

## 6.1 Guidance

# Importance of supply chain communication and a basic flow of information

This document is part of the *International Chemicals Management Toolkit for the Toy Supply Chain* developed by the United Nations Environment Programme (UNEP) in collaboration with the Baltic Environmental Forum (BEF) within the framework of the Global Environment Facility (GEF) project ID: 9771 on Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM).

### Why communication on chemicals is essential

Obtaining and providing information on chemicals is an essential part of the interaction along the (toy) supply chains. Knowledge about the content of chemicals in products is the essential basis of any any chemicals risks management #Section 1\_11 chemicals and decision-making on the use of input materials (in toys). Without information, toy producers, but also actors downstream of the supply chain, such as retailers, are uncertain if they comply with legislation and sufficiently protect children from harmful impacts of chemicals.

The toolkit section on [supplier communication](#) provides guidance on how to [obtain information on chemicals](#) from suppliers. A [chemicals inventory](#) is introduced as a tool to organise and analyse the information. This section explains the importance of communicating information on chemicals to customers, which may be companies (downstream supply chain) or end consumers of products. The guidance aims at supporting an efficient communication and good understanding of the customers' information needs.

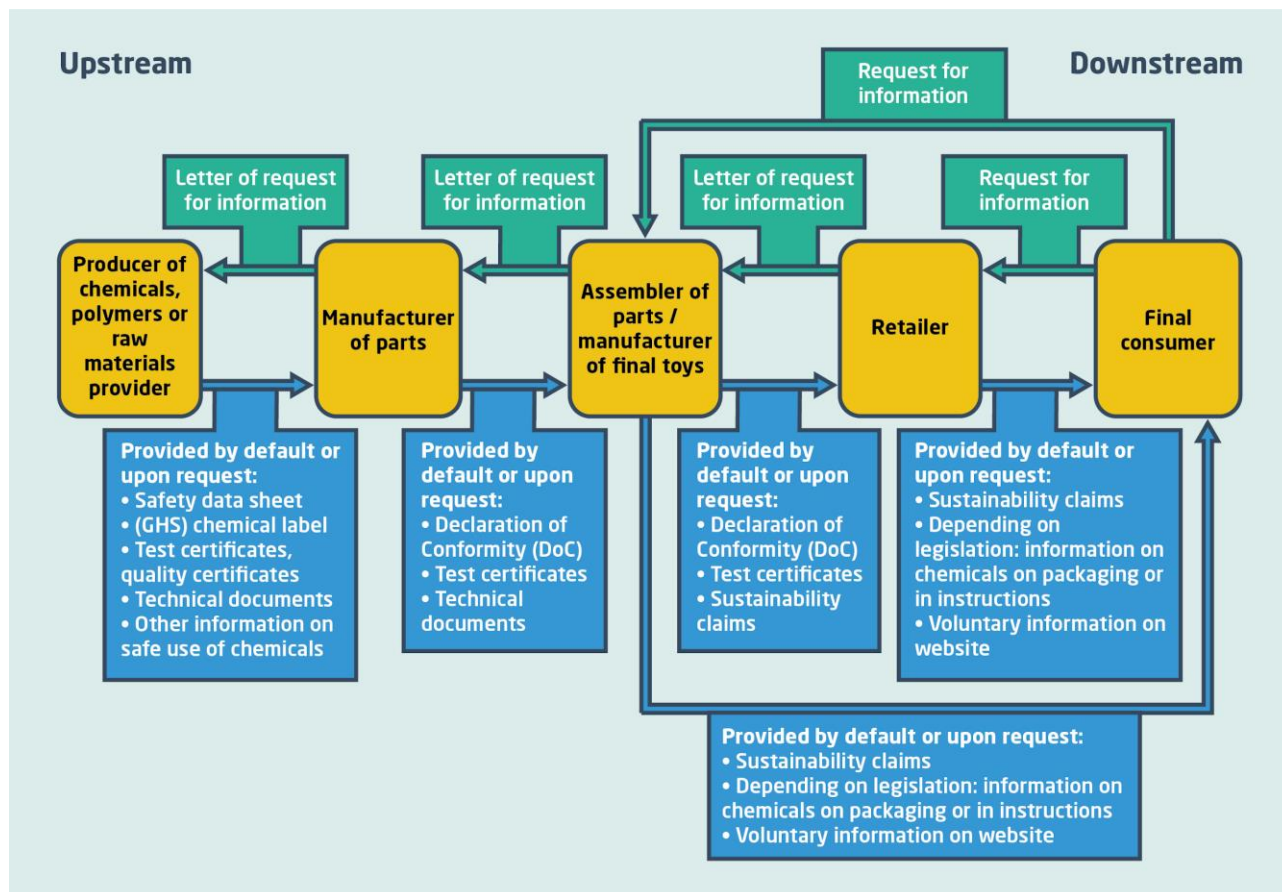
### Communication via documents

Supply chain communication on chemicals is the flow of information between producers and customers at different stages of the supply chain. The information usually flows [#Section 3\\_1guidance](#) getting info in the form of documents with or without a standardised structure and content. Examples are safety data sheets, declarations of conformity, chemical labels, confirmations of compliance with legislation and standards, or confirmations of the absence of certain chemicals. Information can be provided 'automatically' upon supply but may also have to be requested from the supplier. The documents exchanged along the supply chain help all actors to assess and document that they comply with legislation, customer demands or other requirements for their products.

The actors placing final products, such as assembled toys, on the market or providing them to retailers for doing so, may (have to) communicate information on chemicals to consumers as well. Some guidance on how consumers should be informed about chemicals (of concern) is provided here.

The information flows along the supply chain via documents illustrated in Figure 1. The supply chain and information flows are simplified; in reality many more actors are involved.

Figure 1: Overview of information flows in the supply chain



**Documents providing information on the chemical content (and their hazards) is an essential part of the product. Providing it in high quality saves resources for both the suppliers and the customers.**

## Options and requirements to communicate

Producers of chemicals and chemical products, such as (additive) mixtures, polymers or polymer compounds should provide information on which chemicals with hazardous properties are contained in relevant concentrations. In countries where the [GHS is implemented](#), this information is provided in a safety data sheet (SDS). An SDS should specify the names and hazards of all substances in the mixtures that are [classified according to the GHS](#) and that are contained above defined concentration limits. In countries or regions, where the GHS is not implemented, the existing chemicals legislation defines what type of information to provide.

Manufacturers of toy parts that are used for further assembly may also be required to provide information on chemicals to their customers. Such information can take the form of proof of the absence of certain chemicals (e.g. a report of a chemical analysis) or a declaration of compliance/conformity which states that

a toy (part) complies with regulatory and/or specific customer requirements. The provision of such information can sometimes be required by law or it may be requested by the customers who rely on the documentation for demonstrating compliance in their target markets. Customers requesting information on chemicals can also include retailers.

Answering requests about chemicals contained in products is also important to enable the customers to assess the safety of their end-products. If no or unreliable information is provided downstream, the customers may decide to change their suppliers to get more certainty about their input materials and eventually their own product safety.

One frequently-used type of document in supply chain communication is a [declaration of conformity \(DoC\)](#). In the context of toys, a DoC should confirm that all legal requirements fulfilled, and applicable standards have been followed in the product design and testing. It may be legally required to support a DoC by a certificate of a laboratory analysis, but such analysis could also be provided on a voluntary basis to ensure and prove compliance.

## Benefits of transparent communication

Transparency on chemicals in products along the (toy) supply chain helps to build trust and strengthens the business relationships between all actors. Information is crucial for all actors to choose safe and sustainable raw materials to make safe and sustainable products. Good-quality and well-documented information saves resources (e.g. no need to perform laboratory analysis) and allows companies to implement a proactive product design.

Toy manufacturers and their supply chains may have different priorities regarding chemical safety and chemicals management. Some companies have high ambitions and try to avoid as many chemicals of concern as possible in their products. Other companies may adhere to established manufacturing practices and raw materials with certain technical characteristics and prioritise 'just' ensuring legal compliance on chemicals in their products. Efficient supply chain communication enables either approach.

Sustainability and ensuring circular material flows have gained importance at a political and a business level. Both concepts require information on the content of chemicals in products, e.g. to assess different solutions to make a product and whether and how chemicals of concern might contaminate waste and materials streams during recycling [#Section 1\\_10 recycling](#). The waste treatment sector therefore is also a potential user of information on chemicals in products.

### Example of additional communication on chemicals of concern in products

In the European Union, companies placing products on the market must communicate the content of any substance listed on the so-called candidate list ([Substances of Very High Concern \(SVHC\)](#)) which is in a concentration above 0.1% w/w to the commercial customers (companies) as well as to the consumers on request. This enables both companies and consumers to make an informed purchase of a product with such chemicals or to opt for another product, where no SVHC is contained.

In addition, this information that one or several SVHC(s) are contained in a product in concentrations above 0.1% w/w must be notified to the European Chemicals Agency. This information is collected in a [database](#) and (partly) made accessible to the public. This system increases transparency about chemicals in products and should support the transition towards a circular economy. This obligation equally concerns toys, thus if the toys produced and placed on the EU market contain chemicals included in the candidate list, information must be submitted

## References:

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