

6.5 Guidance

Informing consumers about chemicals in toys

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).

Awareness among consumers and retailers about the issue of chemicals of concern in products is growing. The demand for products that are environmentally and health friendly increases as well as the request for using safe and sustainable materials. In response, manufacturers are progressively highlighting the environmental and health performance of their products on the packaging or in marketing materials by means of sustainability claims, for example in the form of statements, symbols, or labels. Sustainability claims can help consumers to make informed purchasing decisions and can increase trust in a product or brand.

This guidance aims to support companies in developing useful and relevant product sustainability claims regarding chemicals. This includes guidance on how to make a sustainability claim reliable, clear, unambiguous and useful, how to substantiate such claims and an overview of good practice in communicating product safety as well as on how to avoid misleading claims.

Options to communicate about the chemical and environmental performance of products

Three main options to highlight the environmental benefits of a product can be distinguished, which may be specified regarding chemical safety.



Figure 1: Options to highlight product sustainability / chemical performance

Ecolabels – a third party certified labelling (Type I environmental label)

Ecolabels aim to guide consumers' purchasing decisions by differentiating products with an increased environmental performance from those with an average or low performance with an easily recognisable logo.

In principle, the organisation awarding an ecolabel develops criteria that products must fulfil to get the label. Under the ISO standard Environmental labels and declarations — Type I environmental labelling — Principles and procedures (ISO 14024:2018), a certified ecolabel licence is awarded by an official third-party programme based on a set of multiple criteria. Among these criteria, which are usually publicly available, some may relate to the absence of chemicals of concern and/or a maximum allowed concentration in the product. Companies who want to label their products must demonstrate that the specific product fulfils the labelling criteria. The licence holder can then use the ecolabel to mark the certified product.

A certified ecolabel is the most reliable way to inform consumers about the environmental and chemical safety aspects of a product. However, there are [over 450 ecolabels](#) used globally today and only a handful are relevant for toys, certified and include criteria on chemicals. Examples of such ecolabels are the [Blue Angel](#) and the [Nordic Swan](#) used in Europe and the Chinese Environmental Label ([China Environmental Labelling | Ecolabel Index](#)). The certification schemes for the Blue Angel and the Nordic Swan have specific criteria (including chemicals) for toys, and the Chinese Environmental Label provides environmental standards for toys but is not specific regarding chemicals. Other ecolabels can also be relevant for toys, such as [OEKO-TEX®](#) if the toy is made from textile materials.

When you consider applying for an ecolabel for your toy(s), assess which label is relevant and well recognised in your target market. Check if your product fulfils the criteria, e.g. [using the chemicals inventory](#) to check the chemicals content. Evaluate if the application and certification costs pay off with a view to increasing your markets.



Figure 2: Examples of ecolabels relevant for toys (From left to right: German Blue Angel, Nordic Swan, Oeko-Tex, China Environmental Label)

Self-declared/ self-assessed environmental claims (Type II environmental labelling)

One way to inform customers, including consumers about the environmental and health impacts of a product is a product self-declaration. Such self-declaration can, for example, take the form of statements, pictures or symbols on the product or its packaging that highlight the performance of the product. Claims based on self-declaration or self-assessment must be verifiable, accurate and not misleading, and companies **should have** credible evidence to support their claims (Ekodizaina Kompetences Centrs 2019).

The international ISO standard on self-declared environmental claims (ISO 14021:2016) provides guidance on developing self-declared/ self-assessed sustainability claims.

Claims that are based on self-declaration or self-assessment, are usually not peer-reviewed and not verified by a third party. Thus, such claims without having reliable, transparent, clear and accessible information to back up the claim, should simply not be made.

Environmental product declarations (Type III environmental declarations)

An environmental product declaration demonstrates a product's environmental performance. It must be based on a life cycle assessment. A life cycle assessment is a standardised method to assess the impact of a product or process on the environment considering all relevant stages in its life cycle. The environmental impacts are quantified for different impact categories, such as the contribution to the greenhouse gas potential, ozone depletion, land use, or human and environmental toxicity. Environmental product declarations are based on such assessments, which are to be verified by an independent third-party. The international ISO standard 14025:2006 specifies the principles for developing Type III environmental declarations.

Characteristics of a claim

Any claim on product sustainability including information on chemicals should follow the fundamental principles outlined in the [UN Guidelines for Providing Product Sustainability Information](#).

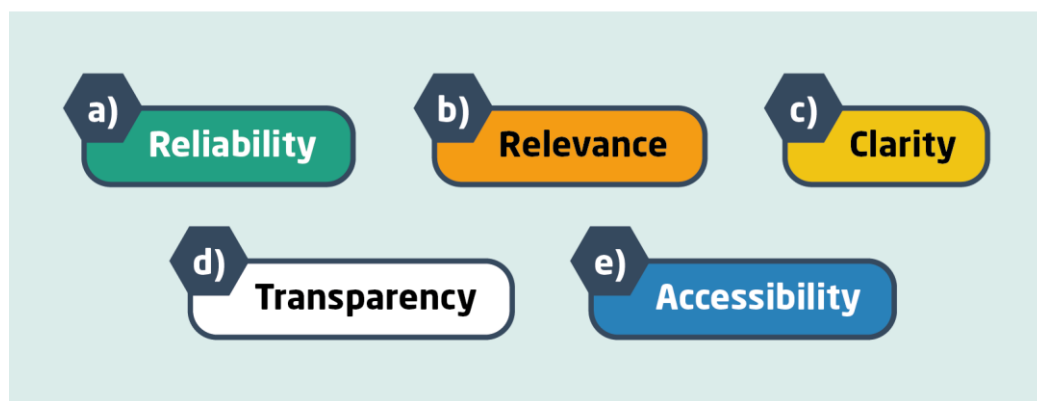


Figure 3 Five principles of communicating product sustainability information (UNEP 2017).

a) Reliability

Claims should be accurate and truthful. Robust evidence for the claim should be available, such as data or test certificates. Compliance with legal requirements should be proven according to defined standards or test methods. Information should ideally be available in an understandable way, as consumers may not easily understand laboratory analysis protocols or similar documents.

b) Relevance

Claims should cover the most significant aspects of the product. The attention should not be focused on smaller details (e.g., sustainable packaging) that make only little difference to the overall sustainability performance of the product. Sustainability trade-offs should not be masked, as this is misleading for consumers. Furthermore, claims should be relevant for the product and materials used. For example, stating that a wooden toy is free from phthalates is truthful but misleading, as wood never contains phthalates.

c) Clarity

The claims should be precise and easy to understand. They should link directly to an exact property of a product (e.g. natural rubber product, phthalate-free) or highlight some benefit that a manufacturer has

implemented (e.g. change from solvent-based to water-based paint). Unclear or vague claims such as ‘ecological’ or ‘all natural’ have no clear meaning and should be avoided.

d) Transparency

Even when manufacturer claims related to the chemical composition or properties are based on data or other evidence, often the latter may not be easily accessible. For some products, companies in the upstream supply chain may withhold information on the chemical constituents of the product due to confidentiality concerns and especially if that is not required by law. However, according to the Article 22 of the Dubai Declaration, ‘information on chemicals relating to the health and safety of humans and the environment should not be regarded as confidential’ (UNEP 2006).

If proprietary information is not disclosed, the claim should be backed by clear and complete data, for example based on testing (including a description of test methods), information on which laboratory was hired, or other methodologies used for evaluation.

e) Accessibility

Evidence highlighting product sustainability should be easily accessible. The product sustainability information often may not fit easily on the packaging, meaning a link or a QR code may be provided for consumers to find out more. Moreover, product sustainability data should be made understandable for average consumers who are not used to reading technical reports.

How policy facilitates transparency. Example from Europe

In the EU, Article 33 of the [REACH chemicals regulation](#) entitles consumers to request information on specific chemicals in non-chemical products from the actors in the supply chain. Producers and assemblers of such products as well as retailers must respond if substances [listed as “Substances of Very High Concern”](#) under REACH are present in their non-chemical products free of charge and no later than 45 days after the request was received. The information must include names of all REACH SVHC present above 0.1% w/w in the product, as well as information on the safe use of the product.

Companies exporting or intending to export to the EU should therefore have this information at hand and be prepared to provide it to the importing company so that it can fulfil its requirements.

Companies wanting to go beyond the legal requirements regarding consumer communication may create benefits regarding transparent communication, increased trust in business relationships, and more efficient communication. Such companies should refer to the [UN Guidelines for Providing Product Sustainability Information](#).

References

Ecolabel index. *The largest global directory of ecolabels*. <https://www.ecolabelindex.com/>. Accessed 20 December 2021.

Ekodizaina Kompetences Centrs (2019). *Use of environmental claims: best practice guide*. <https://www.fitreach.eu/sites/default/files/editor/publications%20ENG/Use%20of%20environmental%20claims.pdf>. Accessed 20 December 2021.

ISO 14024:2018 (2018). *Environmental labels and declarations — Type I environmental labelling — Principles and procedures*. <https://www.iso.org/standard/72458.html>. Accessed 20 December 2021.

ISO 14021:2016 (2016). *Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling)*. <https://www.iso.org/standard/66652.html>. Accessed 20 December 2021.

ISO 14025:2006 (2006). *Environmental labels and declarations—type III environmental declarations—principles and procedures*. <https://www.iso.org/standard/38131.html>. Accessed 20 December 2021.

United Nations Environment Programme (2017). *Guidelines for Providing Product Sustainability Information: Global Guidance on Making Effective Environmental, Social and Economic Claims, to Empower and Enable Consumer Choice*. <https://www.oneplanetnetwork.org/knowledge-centre/resources/guidelines-providing-product-sustainability-information>. Accessed 20 December 2021.

EUR-lex. *Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)*. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02006R1907-20211001>. Accessed 20 December 2021.

ECHA. Candidate list of Substances of Very High Concern (SVHC). <https://echa.europa.eu/web/guest/candidate-list-table> . Accessed 20 December 2021.

United Nations, Environment Programme. Strategic Approach to International Chemicals Management. <https://www.saicm.org/Portals/12/documents/saicmtxts/SAICM-publication-EN.pdf>. Accessed 20 December 2021.