

## 6.6. Example

### Consumer information on 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).

This example illustrates a possible approach to consumer information on chemicals in toys. It should not be copied as is. Please, always implement consumer information according to your specific situation and products.

A manufacturer of plastic toys designed a new product line consisting of a set of exotic animal species. The new products are made of a new input material: a polymer based on polylactic acid (PLAA) which was sourced from a formulator in Southeast Asia. This relatively new “bioplastic” is often considered environmentally friendly as it is made from plant materials and is compostable. It had not been used or tested by the company before in other products.

As production commenced, a brand was developed for the new product line, which was specifically targeted at consumers conscious of sustainability. The packaging was designed in green colours with plant ornaments and alongside the product description, additional information on the sustainability and health performance was displayed. This included the claims “100% plant-based”, “Ozone-friendly”, “BPA-free” and “Non-toxic materials”. To highlight the product performance further, the packaging also featured a logo of the “Green consumers group”.

After the release of the new product line, one of the company’s potential customers, a large retailer, ordered a sustainability audit before entering a large-scale supply contract with the manufacturer. This new product group was one of the targets of the audit. During this audit, the auditor found the aforementioned claims to be misleading. The table below provides a summary of the auditor’s findings.

*Table 1: Examples of how sustainability claims are evaluated*

Claim	Analysis
“100% plant-based”	This claim was found to be not completely true. Even though the polymer is made from plants, it contains additives and the product itself is coated with dyes, both of which are made from fossil resources. Based on the auditor’s findings, it was required that the claim be changed. It was suggested to either specify the real percentage of plant-based raw material or to entirely remove the claim from the label.
“Ozone friendly”	This claim is true, but not relevant for the given product, as none of the manufacturing processes involved chemicals that destroy the ozone layer. The auditor recommended removing this claim.
„BPA-free”	Although this claim is true, it is not fully relevant because BPA is not used in PLAA

	<p>polymer production but could be contained in polymers in general. For consumers who seek to avoid BPA, the claim is still useful to guide their decision about safer products. The auditor recommended that the manufacturer substantiates this claim with further information on plastic types and hazardous residues that could be uploaded to their website, to provide information on what the product contains, which is more relevant for its safety than what it does not contain.</p>
“Non-toxic materials”	<p>This claim was found to be false. After checking the SDSs of input materials for the exotic animals product line, the auditor found several additives that had GHS classifications as toxic to reproduction and causing systemic organ toxicity that are included in the polymer at significant concentrations. The manufacturer had failed to thoroughly analyse the input material documentation (SDS) of two additive mixtures before making this claim. The auditor therefore recommended removing the claim and more carefully checking the chemicals information. The auditor recommended that the company could also phase out the two additive mixtures and use non-hazardous ones instead.</p>
Label “Green consumers group”	<p>The auditor was not able to find any information on an independent “Green consumers group”, concluded the label to be irrelevant and requested its removal to avoid a wrong impression about the environmental friendliness of the product line. He suggested using recognized third-party labels instead.</p>

## References:

- 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.