

# COMMUNITY OF PRACTICE ON CHEMICALS IN PRODUCTS

Organized by the SAICM Secretariat and the University of Cape Town

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## Discussion digest

### Topic of Discussion: Chemicals in Toys

This SAICM/UCT discussion of the Chemicals in Products Community of Practice (CiP CoP) was focused on “Chemicals in Toys”. Children absorb pollutants through the mouth, skin and by breathing them in. Since children have a larger hand-to-mouth activity and faster breathing, they absorb more pollutants than adults compared to their body weight. An important way for toxic chemicals to enter a child's body is through toys. Many studies have revealed chemicals of concern in toys purchased in different countries and regions such as heavy metals, endocrine disrupting chemicals and persistent organic pollutants that can have a harmful effect on children's health. However, few regulatory systems are set up to inform on what is in such products. Regulations on chemicals in toys in many countries are not advanced or enforced, and many countries lack approaches to ensure transparency for chemicals in toys within and outside the supply chains. The global toy market is growing rapidly and is expected to be worth \$131 billion by 2025. The absence or lack of information about toxic chemicals in toys on product labels raises concerns about the environmental effects of toxic toys, especially when products are discarded, dumped in landfills, or disposed of by open burning or incineration. Toxic chemicals in toys can be released into the environment, causing pollution, and affecting health. Therefore, the aim of this discussion was to understand problems in disclosing chemicals of concern in toys; and suggestions were made for improving regulations and transparency of chemical information in the toy sector to ensure toys are safe for children and the environment.

**This discussion explored aspects on chemicals in toys regulations, monitoring, and information sharing with consumers led by a dynamic team of presenters.**

To view the PowerPoint presentation from this discussion, click [here](#).

## ABOUT THE PRESENTER



**Olga Speranskaya** is a Co-Director of Health and Environment Justice Support (HEJSupport), an international organisation aimed to achieve a healthy environment and

environmental justice for people. HEJSupport works at the global, regional and national policy level and directly with communities affected by toxic chemicals and waste. Dr. Speranskaya is also a Senior Advisor at the International Pollutants Elimination Network (IPEN), a global network of non-profit organisations in more than 120 countries working together for a toxic free environment. She received the 2009 Goldman and 2011 UNEP Earth Champion awards for grassroots environmental activism in Eastern Europe, the Caucasus, and Central Asia. [info@hej-support.org](mailto:info@hej-support.org); <http://hej-support.org>



**Varuzhan Gyurjyan** is a director of Mankan LLC that is the leading toy manufacturer in Armenia. The first toy store was opened in Yerevan in 1998. The company produces toys for Armenia and other countries of the Eurasian Economic Union, and the EU. <http://www.mankan.am>



**Gohar Khojayan** is a Communications Specialist at Armenian Women for Health and Healthy Environment (AWHHE) NGO based in Yerevan, Armenia. Since 1999 AWHHE has successfully

implemented more than 140 projects. AWHHE is national SAICM NGO focal point and a member of the International Pollutants Elimination Network (IPEN). Ms. Gohar Khojayan is responsible for public education, advocacy and stakeholder involvement. She represents AWHHE in the SAICM related processes. [office@awhhe.am](mailto:office@awhhe.am); <http://www.awhhe.am>



**Thony Dizon** has been working for the EcoWaste Coalition for more than 10 years. He handles the Chemical Safety campaign of the organization through the Project Toxic-Free for Human Rights and Sustainable Development in the Philippines (Project Toxic-Free Philippines). [info@ecowastecoalition.org](mailto:info@ecowastecoalition.org); <http://ecowastecoalition.blogspot.com>



**Ram Charitra Sah**, has a B.Sc. in Forestry and M.Sc. Environmental Science. He is an Executive Director and Environment Scientist at the Center for Public Health and

Environmental Development (CEPHED) dedicated for the protection of public health and environment through research, awareness and capacity building, and policy dialogue. CEPHED is IPEN participating organization and has been part of global and national campaigns and advocacy work on toxic chemicals, health, and environment. Mr. Charita Sah has pioneered the issue of Chemical Safety and Toxic Chemicals in Nepal through carrying out groundbreaking research in this area. [info@cephed.org.np](mailto:info@cephed.org.np); [www.cephed.org.np](http://www.cephed.org.np)

## 2021 DISCUSSION 3 ATTENDANCE BREAKDOWN

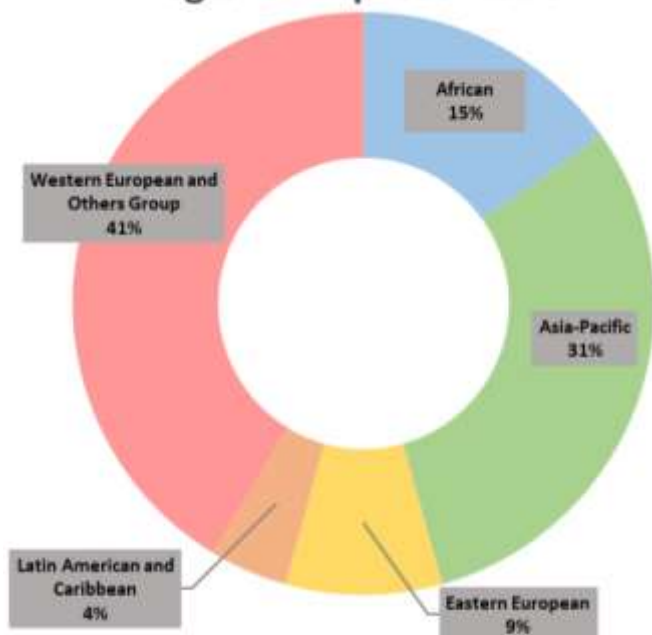
TOTAL DISCUSSION 3 ATTENDEES: 46

Female – 57%

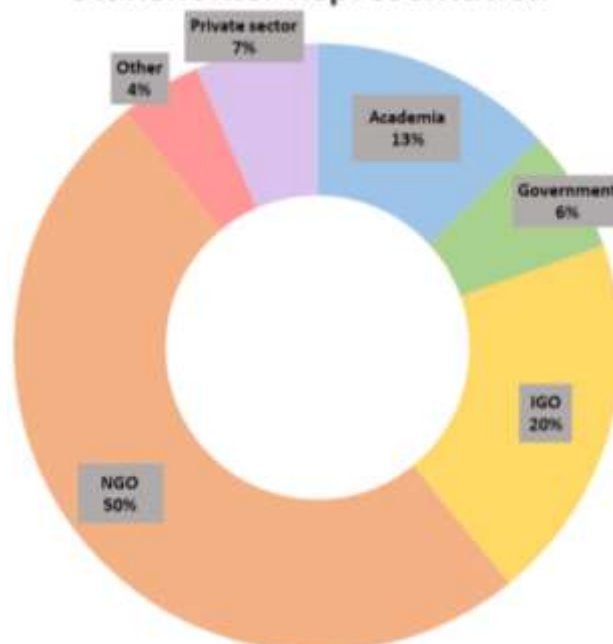
Male – 41%

Unknown – 2 %

### Regional Representation



### Stakeholder Representation



Key:  
IGOs – Intergovernmental organisations  
NGOs – Non-governmental organisations

## Chemicals in Products Community of Practice 2021 Discussion 3 Summary and looking ahead

There are three key areas identified and discussed in relation to chemicals in toys:

### 1. Regulating chemicals in toys

- 80% of participating countries are party to the Convention of the Rights of the Child (CRC) and yet most of participating low- and middle-income countries (LMICs) do not have either chemicals legislation or specific legislation regulating chemicals in toys.
- The Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes, highlights various violations of children's rights and states that “businesses have a responsibility to respect the rights of the child” and “to prevent children from being exposed to toxics from their activities, both directly and indirectly”. The Report further requests specific attention “to the potential for children to be exposed to toxics by their activities, through the products that they manufacture or sell”.
- Different regions and countries have varying regulations, and there is no international legislation for restricting hazardous chemicals in toys. All who participated in the poll (N=22) felt that there is a **need for a global approach to chemicals in toys regulation**.
- **Toy manufacturers are a key stakeholder in reducing and removing hazardous chemicals in toys.** It was emphasized that toy manufactures should abide by national and/or regional jurisdictions in order not to export dangerous toys. (e.g., EU Directive and the Eurasian Economic Union Technical regulation on the safety of toys).

### 2. Monitoring of chemicals in toys

- Many participants mentioned that while currently **there was a lack of monitoring of toys and chemicals of concern in toys** within their countries, there is a recognition of the importance of this kind of monitoring.

- **Governments, scientific institutes, and NGOs** play a vital role in supporting and conducting research on the harmful effects in toys. They are also key for **identifying alternatives** and **supporting further assessment** to avoid regrettable substitutions (i.e., replacing one chemical with another that eventually is also hazardous).
- **Monitoring** of toxic chemicals in toys can trigger important legislative decisions.
- **Reliable data is needed for legal action.** For example, data generated from the periodic market investigation conducted by EcoWaste Coalition in the Philippines were used to build a legal case in 2018. This led to the Toy and Game Safety Labeling Act promulgated in 2019.

### 3. Consumer access to information

- **Accurate and detailed information** on toy product packaging and labels is key for consumers to have access to information.
- **Toy labelling rules and schemes differ from region to region and from country to country.**
- Some labels may mislead consumers with false information or contain no warning information for buyers about the potential danger of the chemicals contained in the toy.
- The European Chemical Agency set up a good example of disclosing toxic substances in products by developing a database that provides greater transparency of information to manufacturers, consumers, recyclers. The requirements demand that all substances of very high concern identified under the EU chemical legislation REACH in concentrations of at least 0.1% by weight of all constituent components of products, must be reported to the EU Chemicals Agency and will be included into the database.
- The absence or lack of information about toxic chemicals in toys on product labels raised concerns about the environmental effects of toxic toys, especially when products are discarded, dumped in landfills, or disposed of by open burning or incineration. **Toxic chemicals in toys can be released into the environment, causing pollution, and affecting health.**

## ANNEX

### DETAILED SUMMARY OF DISCUSSION 3:

### **THE DISCUSSION WAS STRUCTURED AROUND THREE QUESTIONS AND THE KEY DISCUSSION INPUTS FROM PARTICIPANTS ARE PRESENTED UNDER EACH:**

**Question 1. Does your country have regulations on chemicals of concern in toys, are these functioning and enforced and which chemicals in toys are regulated?**

#### Summary of comments from different countries and sectors, although not necessarily representative:

<b>ARMENIA</b> (Private sector)	<ul style="list-style-type: none"> <li>- Mankan, a toy manufacturer in Armenia, is currently making soft toys.</li> <li>- The materials used are organic and therefore have no toxic elements.</li> </ul>
<b>BANGLADESH</b> (NGO)	<ul style="list-style-type: none"> <li>- Unfortunately, there are no regulations over chemicals used in toys.</li> <li>- Environment and Social Development Organization (ESDO) has prepared a Study Report On 'Toxic Toys: Heavy Metal Content &amp; Public Perception in Bangladesh' in 2013.</li> <li>- In the continuation of monitoring the toxic toys, ESDO has extensively researched BPA (Bisphenol A).</li> <li>- BPA is used to make toys, food storage containers, sports equipment, plastic bottles including water bottles, electronic equipment, dental sealants, CDs, and DVDs.</li> <li>- It heavily affects the nervous, cardiovascular, endocrine system as well as causes obesity, diabetes, and cancer in severe cases.</li> <li>- ESDO had examined 12 toy samples along with surveying the consumers and retailers of toys.</li> <li>- A Laboratory at the University of Minnesota Duluth, USA conducted the tests.</li> <li>- Average content of BPA was found to be 0.87 (µg/L) in the samples.</li> <li>- This is 22 times higher than the EU standard permissible limit.</li> <li>- It was also evident that the yellow colour has consistently higher level of BPA in our sample result, while the lowest was in green and white coloured samples.</li> <li>- According to Survey of ESDO, toys are the highest purchased products and a large portion (95%) of the surveyed population is unaware of the health effects of BPA.</li> <li>- ESDO is working on expanding this report to lead containing paints that are used in toys.</li> <li>- <b>Report Link:</b> <a href="https://ipen.org/sites/default/files/documents/ESDO%20Study%20Report%20on%20Toxic%20Toys%20in%20Bangladesh.pdf">https://ipen.org/sites/default/files/documents/ESDO%20Study%20Report%20on%20Toxic%20Toys%20in%20Bangladesh.pdf</a></li> </ul>

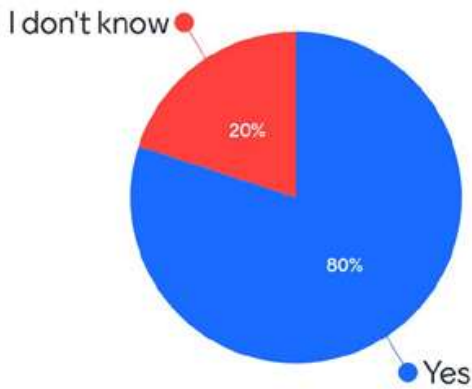
<b>CAMEROON</b> (NGO)	<p><b>French contribution:</b></p> <ul style="list-style-type: none"> <li>- Il n'y a pas de loi spéciale au Cameroun sur les produits chimiques et les jouets pour enfants.</li> <li>- Le Cameroun est membre de la SAICM et reste soumis à ses exigences.</li> <li>- De plus, le pays a signé et ratifié des conventions internationales sur les produits chimiques telles que Stockholm, Bâle, etc...</li> <li>- Des efforts restent à faire au niveau national en ce qui concerne les produits chimiques et les jouets.</li> </ul> <p><b>English translation:</b></p> <ul style="list-style-type: none"> <li>- There is no special law in Cameroon on chemicals and children's toys.</li> <li>- Cameroon is a member of SAICM and remains subject to its requirements.</li> <li>- In addition, the country has signed and ratified international conventions on chemicals such as Stockholm, Basel, etc...</li> <li>- Efforts remain to be made at the national level about chemicals and toys.</li> </ul>
<b>GERMANY</b> (NGO)	<ul style="list-style-type: none"> <li>- Recent EU concerns are going towards online selling of toys.</li> <li>- In the EU, the Safe Toys Directive regulates chemicals, however, there are several loopholes.</li> <li>- CMRs are only banned on the surface of toys but many sanitizers, allergens, neurotoxins, and EDCs are not regulated.</li> <li>- There are local and regional regulation, but in the age of eBay and Amazon and international purchases it does not always work.</li> </ul>
<b>HONG KONG</b> (Private sector)	<ul style="list-style-type: none"> <li>- One approach could be a precautionary approach, like Swiss printing ink ordinance.</li> <li>- Another approach could be to have a positive list.</li> <li>- Should anyone want to use new chemical, they should share toxicological data.</li> </ul>
<b>IRAN</b> (Academia)	<ul style="list-style-type: none"> <li>- There are lots of news and alerts in local newspapers about the danger of chemicals in toys.</li> <li>- Not aware of government regulations about chemicals in toys.</li> </ul>
<b>NEPAL</b> (NGO)	<ul style="list-style-type: none"> <li>- Toys Standard Enacted on 16th Jan 2017, became effective on 18th June 2017, and suspended on 17th Nov 2017 due to Corporate Sector pressure.</li> <li>- Standard had included 12 chemicals: Lead, Mercury, Cadmium, Chromium, Arsenic, Zinc, Selenium, Antimony, Barium, Bromine, BPA, and Phthalates</li> <li>- A new weaker standard was suggested in 2018 and does not have the BPA, Phthalate, Zinc, or Bromine.</li> <li>- This has not yet been Gazetted.</li> <li>- A standard will help consumers to get safer products, help government to regulate the import and export and consumer protection, help industry to boost their export, income, and image.</li> <li>- New chemicals are getting into the toy supply chain, so more evidence needs to be generated globally to keep track of toxicity of these new chemicals.</li> <li>- Safer alternatives are available.</li> <li>- Development of science and technology would be beneficial.</li> <li>- Government of Nepal carried out monitoring of toy during the process of enacting mandatory standards, but the report has never been made available to the public.</li> </ul>
<b>PHILIPPINES</b> (NGO)	<ul style="list-style-type: none"> <li>- In the Philippines there are specific chemicals in toys being regulated but not all.</li> <li>- Implementation and enforcement are still concerning.</li> </ul>
<b>SOUTH AFRICA</b> (Academia)	<ul style="list-style-type: none"> <li>- No chemicals management policy nor a regulation for toys.</li> <li>- This is problematic as manufactures do not need to disclose information on what chemicals are in their products.</li> </ul>
<b>SRI LANKA</b> (NGO)	<ul style="list-style-type: none"> <li>- There is no law on these chemicals.</li> <li>- Unfortunately, there are no facilities to check toys.</li> <li>- Developing a regulation will benefit Sri Lanka, especially when thinking about lower and middle-income families who cannot afford costly toys that are supposed to be safe.</li> <li>- If testing is conducted and demands for regulated limits established or a third-party certification established, this would help create a safe toys market.</li> </ul>
<b>SURINAME</b> (Government)	<ul style="list-style-type: none"> <li>- No regulation on chemicals in toys yet.</li> </ul>
<b>UNITED STATES OF AMERICA</b> (Private sector)	<ul style="list-style-type: none"> <li>- There are effective chemical restrictions.</li> <li>- These are effectively enforced at ports of entry and by retail surveillance/recall.</li> <li>- Heavy elements, phthalates, nitrosamines are specifically limited, and all CMRs, eye and skin irritants, acutely or chronically toxic materials are also prohibited.</li> </ul>
<b>PRESENTER'S COMMENTS</b> (HEJSupport International)	<ul style="list-style-type: none"> <li>- Only a limited number of chemicals are regulated in toys.</li> <li>- The lists of regulated chemicals in toys vary.</li> <li>- There is little overlap between existing policies which results in different levels of protection for children living in different countries and regions.</li> </ul>

- There is no international legislation on which chemicals should be banned or restricted in toys in the first place. Therefore, toy manufacturers must comply with the requirements from different jurisdictions in order to be able to export their products.

**Throughout the discussion, informal polls were conducted to help encourage discussion among the participants. They do not provide any representative data.**

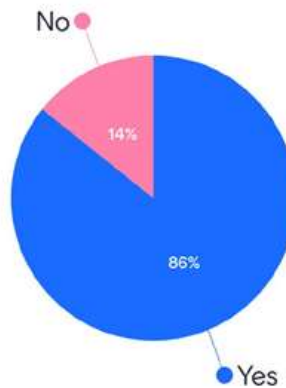
**Poll 1 Results (N=5):**

Is your country a party to the Convention of the Rights of the Child (CRC)?



**Poll 2 Results (N=7)**

Are the rights of the child recognized in the Constitution of your country?



**Poll 3 Results (N=22)**

Would it be good to have a global approach to chemicals in toys regulation?

Yes -100%  
No – 0%

**Poll 4 Results (N=18)**

How would it be beneficial to have chemical regulations in toys in place in your country?

**Health and safety of human health and the environment (n = 12):**

- “The answer is clear: safety for children, workers and the environment.”
- “Safer for kids”
- “It would ensure that the responsibility to keep children safe is not entirely on the shoulders of the parents or caregiver of the child but also on the manufacturers and government.”
- “Children are more susceptible than adults to effects from chemicals; play is a critical developmental activity and should be safe.”
- “Safer for environment (during end-of-life recycling).”
- “Help consumers to get safer products.”
- “Chemical regulation benefitted mostly human health and the environment.”
- “It would build up a healthy environment and future generation.”
- “Save future people from toxic chemicals. Creating safe environment and fair business opportunities.”
- “Safer for environment and human health.”
- “More safety for children, more transparency.”
- “We need to develop a well-advanced legislation to ensure the safety of children and avoid double standards when toys banned in one country for chemical safety reasons are imported to other countries with less stricter regulations.”

**Import and export impacts (n = 2):**

- “Help government to regulate the import and export and consumer protection and will help industry to boost their export, income and image.”
- “Rising cost of toys.”

**Information generation and sharing (n = 4):**

- “So, consumers can make an informed choice and reduce children’s exposures to harmful chemicals.”
- “More clarity in the supply chain.”
- “Because new chemicals are getting into the toy supply chain, more toxic evidence are being generated globally, safer alternatives are available, development of science and technology.”
- “Because new scientific data emerges.”

## Poll 5 Results (N=5)

### Why should chemical regulations in toys be continuously reviewed?

#### New information (n = 2):

- "Based on new information from study."
- "Because everyday new chemicals are identified as hazardous or toxic."

#### Development of new chemicals (n = 3):

- "Because new chemicals are getting into the toy supply chain, more toxic substances are being generated globally, safer alternatives are available, development of science and technology."
- "Industry is developing new substances; protection of children's health should be a continuous effort."
- "To keep pace with innovation in toys and new science."

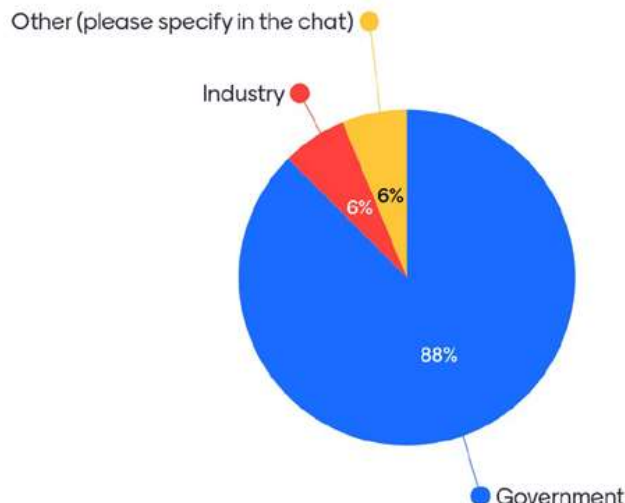
## Question 2. If your country conducts monitoring of chemicals in toys, is this information available to the public? If your country does not conduct monitoring of chemicals in toys, what is needed for this to occur?

<b>ARMENIA</b> (NGO)	<ul style="list-style-type: none"><li>- The consumers should be given more of a voice.</li><li>- Labelling is a demand driven issue - mothers, or caretakers of children must be informed and have to get tools to influence monitoring.</li><li>- In Armenia parents (mothers) groups in kindergartens are quite a force!</li></ul>
<b>CAMEROON</b> (NGO)	<p><b>French contribution:</b></p> <ul style="list-style-type: none"><li>- En 2020, avec le soutien de l'IPEN, des échantillons de jouets pour enfants sur le marché ont été collectés et analysés.</li><li>- Les résultats sont destinés à être rendus publics afin d'intensifier les actions de veille et de plaider pour un cadre juridique et réglementaire au niveau national.</li></ul> <p><b>English contribution:</b></p> <ul style="list-style-type: none"><li>- In 2020, with the support of IPEN, samples of children's toys on the market were collected and analysed.</li><li>- The results are intended to be published to the public to intensify monitoring and advocacy actions for a legal and regulatory framework at the national level.</li></ul>
<b>GERMANY</b> (NGO)	<ul style="list-style-type: none"><li>- Rappex list is used in the EU.</li><li>- The EU offers public access for its directives and papers, but there is no system on products signalling high rates of specific chemicals.</li><li>- On the other side, toys that have SHC are not allowed to get to the market.</li><li>- There is a huge gap, however, in terms of monitoring toys sold online in Germany and the EU.</li></ul>
<b>HONG KONG</b> (Private sector)	<ul style="list-style-type: none"><li>- Eco-friendly Toys are a possible solution.</li><li>- <b>Please complete the survey below regarding Eco-friendly toys:</b> <a href="https://rebrand.ly/ECO-Friendly-Toys-Survey">https://rebrand.ly/ECO-Friendly-Toys-Survey</a></li><li>- It will be useful to see once EU opens up SCIP information for consumers, linked to EU's Product transparency plan.</li></ul>
<b>IRAN</b> (Academia)	<ul style="list-style-type: none"><li>- Media, TV, newspaper, etc... are useful in sharing information.</li><li>- There is information about different bisphenol, formaldehyde, polyphenol, etc... in toys and how to avoid them in Iranian news.</li><li>- Source: <a href="https://irchem.ir">https://irchem.ir</a></li><li>- It is the responsibility for government, NGOs, academic system, etc... to make the people aware.</li><li>- Global regulatory agencies have the responsibility to make sure that all these laws and regulations in developing countries are in place, are in good standing and updated and are ENFORCED!</li></ul>
<b>NEPAL</b> (NGO)	<ul style="list-style-type: none"><li>- As there is no Child Regulation, no monitoring is ongoing.</li><li>- First every country which has adopted SAICM CIP emerging policy, and are party to CRC, should enact toys regulation with the mandatory provision of regular market and industry monitoring and make the results public.</li><li>- Monitoring without making result public does not make sense to public who need to be protected.</li><li>- Having monitoring policy, plan, testing infrastructure (good quality lab, training, and human resources) and enough allocation of national annual budget is essential for conducting monitoring on chemicals in toys.</li><li>- Engagement of a wider stakeholder audience, especially child health, child rights and child welfare-based NGOs and paediatric societies.</li><li>- The major role of monitoring of toys should be carried out by the Government.</li><li>- However, NGOs have been, and continue to, play a vital role in many countries in monitoring the chemicals in children's toys.</li></ul>

	<ul style="list-style-type: none"> <li>- Academia can do the monitoring as well.</li> <li>- There should be mandatory provision in each toy manufacturing company and industry to test each batch of the toys before it leaves the industry premises to the market.</li> <li>- Industries must maintain the standards on their own.</li> <li>- There is also no monitoring of online products including toys sold in Nepal.</li> </ul>
<b>PHILIPPINES</b> (NGO)	<ul style="list-style-type: none"> <li>- The regulation of monitoring of toys being sold online is still a problem.</li> <li>- During the Pandemic, the selling of products including toys through online shopping platforms has boomed, thus a problem of safety monitoring and regulation becomes a major concern.</li> </ul>
<b>QATAR</b> (Government)	<ul style="list-style-type: none"> <li>- There is no monitoring in Qatar.</li> <li>- Currently working on legislation, which will take some time due to different entities involved.</li> </ul>
<b>SOUTH AFRICA</b> (Academia)	<ul style="list-style-type: none"> <li>- South Africa does not conduct any monitoring.</li> <li>- There would need to be legislation for this to happen.</li> <li>- If it were required in legislation, researchers and other institutions could assist the government with data needed for monitoring but ultimately the government needs to have oversight.</li> </ul>
<b>SRI LANKA</b> (NGO)	<ul style="list-style-type: none"> <li>- First need to establish necessary rules and regulations for chemically safe toys.</li> </ul>
<b>UNITED STATES OF AMERICA</b> (Government)	<ul style="list-style-type: none"> <li>- There is limited governmental resourcing in the maintaining and consistent evolution of regulatory programs.</li> <li>- National agencies of competency could collaborate with stakeholders, (academia, included) and assist in the education, information, and behavioural changes, including studying and assessing local, and/or national matters of interest.</li> <li>- Engaging and committing to a project of relevance is often a valuable experience and helps work toward enhanced awareness and commitment, as appropriate.</li> </ul>
<b>UNITED STATES OF AMERICA</b> (Private sector)	<ul style="list-style-type: none"> <li>- US CPSC requires mandatory certification of all toys and checks at ports of entry, online, and at retail level.</li> <li>- Industry must be first line of monitoring chemicals, but government must be active in this area to deter rogue operators.</li> <li>- Fundamental error in all the issues discussed is that they focus on chemical content, not potential exposure, or actual risk.</li> <li>- Nepal standard as proposed by CEPHED was unworkable and government subsequently agreed to align with international toy safety standards.</li> </ul>
<b>ZAMBIA</b> (NGO)	<ul style="list-style-type: none"> <li>- To put in place legally binding control by enacting the law to phase out lead paint and lead in toys would be the best possible solution.</li> </ul>
<b>PRESENTER'S COMMENTS</b> (HEJSupport International):	<ul style="list-style-type: none"> <li>- Monitoring of chemicals in toys could trigger the development of regulations in countries where there are no legislations regulating chemicals in toys.</li> <li>- <b>This is the link to the UNEP Review of chemicals-related Toy Safety Policies and Regulations in selected Low- and Middle-Income Countries:</b> <a href="https://saicmknowledge.org/sites/default/files/publications/UNEP_Review_Toy_Safety_policies_LMIC_final.pdf">https://saicmknowledge.org/sites/default/files/publications/UNEP_Review_Toy_Safety_policies_LMIC_final.pdf</a></li> <li>- Many countries still do not have regulations on toys.</li> <li>- This is not an excuse for not monitoring chemicals in toys.</li> <li>- As was noted in today's presentations, monitoring of chemicals in toys can be a starting point for the stakeholders to initiate the development of the legislation.</li> <li>- Toys sold on-line are of special concern as they are usually much less regulated.</li> <li>- The idea of a global publicly available database of chemicals of concern in toys (using the EU SCIP database as an example) will be helpful for consumers, manufacturers, and recyclers.</li> <li>- Starting July 2021 all toys sold on-line in the Eurasian Economic Union will have to comply with the EEU technical regulation on Toy Safety. This was largely the result of public pressure and consumer demands for toy safety.</li> </ul>

**Poll 6 Results (N=16)**

**Whose responsibility do you think it is to monitor chemicals of concern in toys?**



**Poll 7 Results (N=18)**

**Is there a List of Recalled and Banned Children's Toys in your country? Answer yes, no or I don't know and state the country you are from.**

No – 12 (67%)

Yes – 5 (28%)

I don't know – 1 (5%)

**Countries that said "yes":**

Iran  
The European Union  
United States of America

**Countries that said "no":**

Nepal  
Philippines  
Sri Lanka  
South Africa

**Countries that said "I don't know":**

Germany

**Poll 8 Results (N=14)**

**How are toys sold online monitored in your country?**

No monitoring – 11 (79%)

Monitoring done – 3 (21%)

**Question 3. How will knowing what chemicals of concern are in toys help consumers and regulating authorities in your country make the right choice?**

**ARMENIA**  
(NGO)

- Recycling hazardous waste into new products is a huge concern.
- If developed, the global database should be maintained in at least all UN languages.
- This discussion has identified a number of issues that already now could be picked up for follow-up/global action.

**CAMEROON**  
(NGO)

**French contribution:**

- Connaître les substances chimiques contenues dans les produits et jouets limitera les risques chimiques, protégera la santé des enfants et l'environnement.
- Le respect de l'étiquetage doit être exigé avec description des composants du produit dans la langue nationale du lieu de commercialisation.

**English contribution:**

- Knowing the chemicals contained in products and toys will limit chemical risks, protect children's health and the environment.



	<ul style="list-style-type: none"> <li>- Compliance with the labelling must be required with description on the components of the product in the national language of the place of marketing.</li> </ul>
<b>GERMANY</b> (NGO)	<ul style="list-style-type: none"> <li>- There is a huge gap of information on hazardous substances (HS) in toys from public side in Germany.</li> <li>- It is up to us, CSO, to inform the public.</li> <li>- WECF, for more than ten years, has been running a programme called <a href="http://www.nesting.org">www.nesting.org</a>, informing on HS in products and how to avoid risks, including calling for regulations.</li> <li>- Our brochure on toys is available in 10 languages; you can find it here: <a href="https://nestbau.info/broschueren/">https://nestbau.info/broschueren/</a></li> <li>- A database would help to avoid HS come back in products from recycled materials.</li> </ul>
<b>HONG KONG</b> (Private sector)	<ul style="list-style-type: none"> <li>- I feel everything we speak about can be applied for all kind of consumer products, especially sensitive products like toys, cosmetics, textiles, food packaging etc...</li> <li>- Since they go on our skin, and we consume them.</li> <li>- Yes, database would be good for transparency (while protecting confidential information) and will help with enforcement and surveillance.</li> </ul>
<b>IRAN</b> (Academia)	<ul style="list-style-type: none"> <li>- In Iran there are already plenty of information available about chemicals in toys in TV, newspapers, etc...</li> <li>- As usual academic papers are coming out, but it seems that the government is behind the schedule to catch, follow, and enforce.</li> <li>- This may be due to the recent global problems and sanctions.</li> </ul>
<b>NEPAL</b> (NGO)	<ul style="list-style-type: none"> <li>- Once chemicals of concern in toys is known, consumers can make informed choices and informed purchasing.</li> <li>- Government can easily and effectively regulate the toxic toys.</li> <li>- Toys producing companies can enhance their images and reputation as well as boost their export and income.</li> <li>- Information regarding all chemicals of concern need to be properly labelled as per the international standard practice.</li> <li>- Proper allocation of labelling space, understandable language, clearly visible font size and colour is also needed.</li> <li>- Label should also be accompanied by the warning signs as it is very much essential.</li> <li>- First information on chemicals that are harmful to health should be given to public. Alarming information should be printed with red colour.</li> <li>- There should be intention of making recycled products equally safer as original products.</li> <li>- Labelling of chemicals in toys benefits waste management.</li> <li>- Since practices and approaches of managing chemical containing waste and general waste is completely different.</li> <li>- It will also help to reduce environment burden of toxic chemicals as well as eliminate the sources of occupational exposure of waste handling workforce.</li> <li>- Safer recycled products will reach the consumer's hands.</li> <li>- People should be taught where and how to dispose chemicals and chemical waste or toys appropriately.</li> <li>- Mindsets of political leaders should be changed too.</li> <li>- Labelling information is important as this will give consumer the right-to-know.</li> </ul>
<b>PHILIPPINES</b> (NGO)	<ul style="list-style-type: none"> <li>- Labelling information is important as this will give consumer the right-to-know.</li> </ul>
<b>QATAR</b> (Government)	<ul style="list-style-type: none"> <li>- To help assess health risks and waste treatment management.</li> </ul>
<b>SOUTH AFRICA</b> (Academia)	<ul style="list-style-type: none"> <li>- Having chemicals on the labels is important but that is just one step.</li> <li>- Consumers then need information about the chemicals and risks to their children, as well as access to alternative non-toxic toys.</li> </ul>
<b>UNITED STATES OF AMERICA</b> (Private sector)	<ul style="list-style-type: none"> <li>- Full ingredient disclosure is unnecessary and not wanted by most consumers.</li> <li>- This information would be confusing and needlessly alarming.</li> <li>- Only information necessary for safe handling and use should be disclosed.</li> <li>- Better toy safety will not be achieved by additional requirements or ingredient disclosure, but by much better enforcement of existing norms.</li> </ul>
<b>UNITED STATES OF AMERICA</b> (Government)	<ul style="list-style-type: none"> <li>- Consumer right protection.</li> </ul>

<b>PRESENTER'S COMMENTS (HEJSupport International):</b>	<ul style="list-style-type: none"> <li>- Toxic chemicals do not have a place in toys.</li> <li>- There are up to 350,000 chemicals on the global market. Most of them have not been tested for their hazardous properties.</li> <li>- Only limited number of chemicals is regulated in toys.</li> <li>- There are significant differences between the safety requirements for chemical substances in toys between countries and regions.</li> <li>- Chemical-by-chemical approach is applied in most existing regulations.</li> <li>- Consumers, retailers, and recyclers are largely unaware about chemical content of toys.</li> <li>- Good initiatives are on the way. However, given the international nature of the toy sector, including the supply chain stricter international requirements are needed to ensure that toys are equally safe for every child around the world.</li> <li>- Disclosing toxic content of toys will help consumers and retailers to advocate for a strict regulations and enforcement.</li> </ul>
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### **Poll 9 Results (N=10)**

#### **What information about chemicals should be included on the toy labels? Should it be accompanied by the warning signs?**

##### **Information on chemicals of concern (n = 4):**

- “Signs yes, national language! Chemicals of concern, full disclosure.”
- If regulated chemicals of concern are present in toys this should be clearly stated on the label and warning signs should be included.”
- There should be information on the chemicals of concern used to make these toys and the health risks associated with these chemicals.”
- It should contain information on all chemicals of concern as well as warning signs.”

##### **Information for safety reasons (n = 3):**

- “Nothing beyond that necessary for safe handling and use. Consumers just want to know that the product is safe for use and that safety is being monitored by government.”
- A definite safety sign that comes from a monitoring system would really help, as some parents don’t know if an ingredient is harmful though it is mentioned on the label.”
- “A traffic light system might be helpful.”

##### **General information on chemicals (n = 3):**

- “Chemicals used/content/concentration – should be accompanied with warning signs.”
- “Name of chemicals with the colour coded signs to convey the message to the public that it is hazardous for some activities and applicable to some other purpose. Also, recycling information with the types of plastics is a must.”
- “Amount of toxic chemicals.”

## **Poll 10 Results (N=11)**

### **How would knowing what chemicals are in toys benefit waste management, including the recycling and disposal in your country?**

#### **Knowledge and information (n = 4):**

- “It will help the stakeholders involved in waste management! They will know how to handle different toys and what sort of waste management needs to be done based on the chemicals used in the toys.”
- “The type of chemicals and the information on the plastic types (1-7 plastic codes) will be beneficial for the seller as well as the local vendors to identify the recycling potential of the toys and its recycling values in the market.”
- “By sorting.”
- “Information gives a chance to reuse, recycle or utilise a product in a proper way. Recycling can be optimised to (more or less) the same level of products, if it is sure that there are no hazardous substances in the waste.”

#### **Protection of the environment (n = 2):**

- “It will protect the environment from harmful chemicals.”
- “Toys containing toxic chemicals should not be landfilled or incinerated to avoid pollution.”

#### **Correct disposal, handling or recycling (n = 4):**

- “Well, if recyclers were concerned, they could make sure toxic products were not recycled into consumer products, especially toys.”
- “Information on some chemicals of concern (e.g., flame retardants, phthalates, etc...) would be beneficial to recyclers so that they know what the appropriate uses are for recycle.”
- “Yes, it benefitted especially regulations that included Extended Producers Responsibility (EPR) – waste management and proper disposal policy.”
- “Prevent hazardous chemicals from re-entering the market as recycled material, as this happens with plastics.”
- “Avoid recycling of toxic chemicals into new products, avoiding purchasing of toxic toys.”

## **Poll 11 Results (N=16)**

**Would a global database developed under the SCIP approach be important to achieve greater transparency about chemicals of concern in toys?**

Yes - (100%)

No – (0%)

## **Useful resources:**

- **Global Chemicals Outlook Tool I**  
<https://www.unep.org/resources/report/global-chemicals-outlook-ii-legacies-innovative-solutions>
- **WHO (2016): Preventing disease through healthy environments** [https://www.who.int/quantifying\\_ehimpacts/publications/preventing-disease/en/](https://www.who.int/quantifying_ehimpacts/publications/preventing-disease/en/)
- **UN General Assembly A/HRC/33/41 (2016): Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and waste** <https://undocs.org/A/HRC/33/41>
- **UNEP Review of chemicals-related Toy Safety Policies and Regulations in selected Low- and Middle-Income Countries**  
[https://saicmknowledge.org/sites/default/files/publications/UNEP\\_Review\\_Toy\\_Safety\\_policies\\_LMIC\\_final.pdf](https://saicmknowledge.org/sites/default/files/publications/UNEP_Review_Toy_Safety_policies_LMIC_final.pdf)
- **European Toy Safety Directive - Substances Restricted in Toys**  
[https://echa.europa.eu/substances-restricted-toys?p\\_id=eucleflegislationlist\\_WAR\\_euclefportlet&p\\_p\\_lifecycle=0&p\\_p\\_col\\_id=column-1&p\\_p\\_col\\_count=1](https://echa.europa.eu/substances-restricted-toys?p_id=eucleflegislationlist_WAR_euclefportlet&p_p_lifecycle=0&p_p_col_id=column-1&p_p_col_count=1)
- **Chemicals of concern in plastic toys – ScienceDirect**  
<https://www.sciencedirect.com/science/article/pii/S0160412020321498?via%3Dihub>
- **UNEP study: Harmful Chemicals Found in 25% of Children's Toys**  
<http://sdg.iisd.org/news/harmful-chemicals-found-in-25-of-childrens-toys-unep-study-finds/>
- **IPEN initiatives on Chemicals in Children's Toys**

<https://ipen.org/tags/chemicals-childrens-toys>

- **IPEN: Toxics in products**  
<https://ipen.org/site/toxics-products-overview>
  - **IPEN: Raising Awareness on Health Hazards of Phthalates in Toys in Armenia**  
<https://ipen.org/site/awhhe-report-raising-awareness-health-hazards-phthalates-toys>
  - **IPEN: Harmful chemicals in toys in the Philippines**  
<https://ipen.org/documents/harmful-chemicals-detected-toys-sold-philippines>
  - **IPEN: Phthalates in Plastic Toys and Childcare Articles in Serbia**  
<https://ipen.org/site/cry-game-phthalates-plastic-toys-and-childcare-articles>
  - **IPEN: Toxic Chemicals in Children's Products in Nepal**  
<https://ipen.org/documents/toxic-chemicals-childrens-products-nepal>
  - **EU Database on Substances of Concern in Products**  
<https://echa.europa.eu/scip>
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**CiP CoP:** The Secretariat of the Strategic Approach to International Chemicals Management (SAICM) and the Environmental Health Division at the University of Cape Town (UCT) created this Community of Practice (CoP) to foster online discussions and address key issues on Chemicals in Products (CiP) among stakeholders from governments, international organizations, industry, academia and civil society.

This CoP is contributing to the SAICM/GEF project on Emerging Chemicals Policy Issues Knowledge Management Component. This activity is supported by 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)*.

If you have any question or require clarification on this initiative, please contact the SAICM Secretariat at [saicm.chemicals@un.org](mailto:saicm.chemicals@un.org) or UCT at [uctcops@outlook.com](mailto:uctcops@outlook.com).

Join the CiPs CoP at: <https://saicmknowledge.org/community>

**Disclaimer:** The information in this digest represents the opinions of members participating from different stakeholder groups expressed during the discussion. The views expressed in this document do not necessarily represent the opinion or the stated policy of the United Nations Environment Programme, the SAICM Secretariat, the GEF or UCT, nor does citing of trade names or commercial processes constitute endorsement.

