

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: Mapping session of Chemicals in Products

The aim of this discussion was to learn about how the existing Chemicals in Products (CiP) Programme works, mapping out relevant initiatives related to CiP, considering ways to increase the availability and reliability of information on chemicals in products. It also provided an opportunity to understand the successes and the challenges that stakeholders face, and in turn, to explore the further needs to support chemicals in products contribution to the sound lifecycle management of chemicals.

Detailed Intentions included i) information exchange (and highlighting how to access information), and bring to attention existing legislations, regulations and policies that have been adopted in countries, regions and sectors that can be learned from or used as examples; ii) Sharing resources and initiatives to support work on managing and reducing risks related to chemicals in products; iii) providing suggestions for further needs; and iv) sharing achievements and challenges, and recommendations for improvement on the sound management of chemicals in products.

ABOUT THE PRESENTERS



Sandra Avérous Monnery is Programme Officer, Chemicals and Health Branch, at the United Nations Environment Programme (UNEP). She joined the Chemicals and Health Branch in summer 2019, and leads work on chemicals in products, chemicals and plastics, sustainable and green chemistry and the Global Mercury Partnership. She has worked for the past 10 years on sustainable consumption and production at UNEP. Recently, she oversaw the eco-innovation portfolio, engaging all actors, including the private sector and SMEs, towards sustainable value chains and circular economy, where she focused on circularity in the plastics, electronics and textiles sector. She also served as Special Assistant to the Division Director. Development economist, her area of expertise is Chemicals, Sustainable Consumption and Production and Disaster Preparedness.



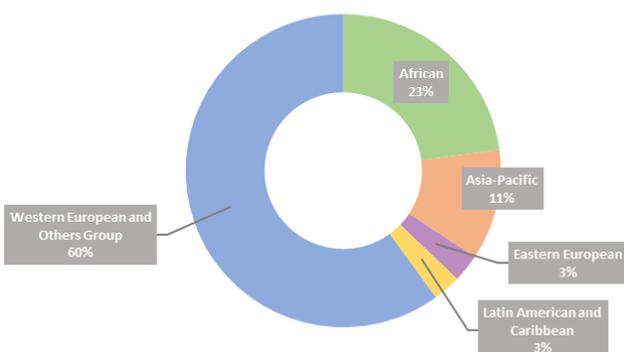
Wenjia Fan joined UNEP as a Junior Professional Officer in June 2018. Before she joined UNEP, she worked for the Ministry of Ecology and Environment of China, for approximately 5 years. She focused on policy research on international environmental governance and facilitated green supply chain management in the Asia-Pacific region.

At UNEP, she works on the Chemicals in Products Programme and facilitates projects related to a series of capacity building activities, aiming to assist developing countries in fulfilling the Multilateral Environmental Agreements (MEAs).

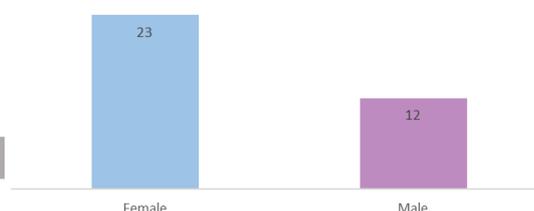
DISCUSSION 1 ATTENDANCE BREAKDOWN

TOTAL ATTENDEES FOR DISCUSSION 1: 35

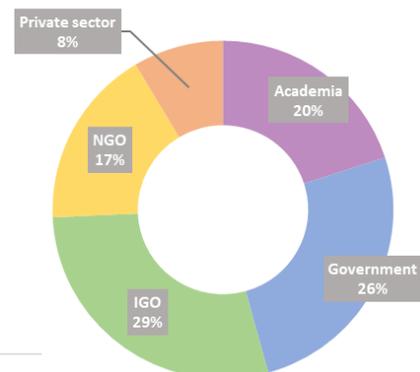
Regional representation



Gender representation



Sector representation



Key:
IGO – Intergovernmental organisation
NGO – Non-governmental organisation

Chemicals in Products Community of Practice Discussion 1

Summary and looking ahead

1. **Setting the scene:** Given that UNEP has been hosting the Chemicals in Products (CiP) Programme, they were invited to introduce the **history of the concept of Chemicals in Products (CiP)** through taking stock of the resolutions adopted by the International Management Conference on Chemicals (ICCM) since 2009, as well as introducing where the CiP Programme derived from. Serving as the Secretariat of the CiP Programme, UNEP also introduced how the CiP Steering Group works, which was proposed during ICCM 3. What UNEP do and what challenges the stakeholders may face were also identified. **The presentation can be downloaded through <https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/chemicals-products>**
2. In terms of actions taken many participants mentioned **regulations introduced throughout the EU based on EU policies and databases of CiP that are publicly available**. Others mentioned **multistakeholder cooperation between UN agencies and other agencies such as Minamata Convention, BRS and voluntary approaches through SAICM**. Mentions of **technical revisions of CiP regulations** in some countries specifically referring to the **toy sector** were also included by participants. In terms of gaps there was a mention of **limited exchange of information** within countries and gaps in **regulation enforcement in the e-commerce sector**. Participants mentioned that CiP is a global supply chain and so the performance of one country may sometimes determine the success of another. Finally, some interesting **initiative from EU** were mentioned related to **databases on substances of concern in articles and products and consumer awareness initiatives**.
3. Participants mentioned several sources currently used for CiP among them were lists from stakeholders such as the **USEPA, UN and NGOs such as OECD**. Furthermore **peer-reviewed literature and grey literature** were mentioned as sources as well as information supplied by IGOs. A wide use of **Global Harmonized System (GHS) and Restricted Substance Lists (RSLs)** as legislation was noted as well as a wide use of **consumption tools such as consumer information**. Participants mentioned **the need for more reliable data** within all of these resources. One challenge that was highlighted had to do with **poor regulation on product labels with regulations not being enforced and information missing from labels**. Finally, participants highlighted a **need of different information depending on the stakeholder being engaged** as well as a need for **information on safe handling of chemicals and for capacity building and reinforcement of equipment for countries**.
4. Among the accomplishment's participants mentioned a **study on sustainable use of plastic done by ISC3, national initiatives done in Armenia** specifically focused on **multistakeholder engagement for raising awareness around CiP**. **Legislation introduced in the US to ban specific chemicals from food packaging and hygiene products** were also mentioned. Challenges mentioned centred around **sharing of information and transparency of legislation, sharing of information on chemicals substitutions, transparency of chemicals of global concern, lack of information on building products and products that contain pesticides, and lack of information on label requirements**. There was also a mention of a need to **improve flow of information and set up of mechanisms of cooperation for countries that are starting out with CiP management**.

ANNEX

DETAILED SUMMARY OF DISCUSSION:

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.

THE DISCUSSION WAS STRUCTURED AROUND THREE QUESTIONS AND THE KEY DISCUSSION POINTS ARE PRESENTED UNDER EACH.

Inputs to the discussion from participants:

Q1. What actions are undertaken in your country, region, or sectors to enable the reliable exchange of chemical content information that is needed to meet current and future regulatory and customer demands?

ARMENIA (NGO)	<ul style="list-style-type: none">- Adopted stringent technical regulation (Regulation of the Government of the Republic of Armenia No. 278-N) of toy safety in accordance with EU approaches (Toy Safety Directive 200948 / EC).- Revised technical regulation regarding toy safety requirements, marking and requirements for conformity certification procedures.- Accession to the EAEC means technical regulations have been brought into line with the requirements of the EEA, which unfortunately are less strict.- The Association Agreement with EU signed in 2017 provides opportunities to harmonize with the EAEU and EU regulations.
CAMEROON (NGO)	<ul style="list-style-type: none">- Significant progress has been made in Cameroon, such as the creation of the SAICM focal point at the Ministry of the Environment; the development of the legal and regulatory framework on hazardous chemicals (Law 2003/003 of April 21, 2003 on phytosanitary protection, order of September 2017 limiting lead content to 90 ppm, etc.); the signing of the partnership contract between Minepedd and the weecam project for the recycling of electronic and electrical waste.- Challenges remain at the level of implementation and the massive involvement of CSOs in the process.
FINLAND (Government)	<ul style="list-style-type: none">- Finnish Safety and Chemicals Agency enables the exchange of info on chemical content in products.- European Chemical Agency (ECHA) has extensive public database and is up to date on the chemicals in use in products.- Regulatory policies are based on EU policies.- Policies in EU are revised as more data on chemicals and exposure comes in.
HEJSupport (NGO)	<ul style="list-style-type: none">- IPEN project showed challenges in exchanging information on chemicals in toys in developing countries.- IPEN study in the Philippines revealed that the country's toy registration and labelling requirements are not effectively enforced as evidenced by 77% of the samples providing zero information about their manufacturers and/or distributors, 75% not indicating License to Operate (LTO) number on the product label, and 75% failing to meet other required labeling information on the packaging.
INDONESIA (Academia)	<ul style="list-style-type: none">- Regular regulation occurs due to poor public knowledge on chemicals in products.
IRAN (Academia)	<ul style="list-style-type: none">- Cooperation between Ministry of Foreign Affairs and UN related agencies (BRS secretariat, SAICM secretariat, Minamata, with Vienna for Ozone, for chemical warfare, etc).- Work started in the MENA/ NENA region but still gaps.- Chemists as scientists in both academia and industry.- Main problem is a lack proper and sufficient enforcement.- Not a lot of communication with ordinary consumers about danger of toxic chemicals.
ISC3 (NGO)	<ul style="list-style-type: none">- REACH-directive is the main regulative framework for chemicals but does not regulate products like electronics or toys.- Information exchange is not transparent, but it is foreseen for the whole chain.- SVHC-substances should be authorized by ECHA.
SOUTH AFRICA (Academia)	<ul style="list-style-type: none">- Southern African region has limited exchange of information on what chemicals are in products imported and exported in the region.- No current overarching basic chemicals framework or legislation.

- SWEDEN (Government)** - Within the EU an initiative to enhance consumer awareness and knowledge has been introduced at <https://www.askreach.eu/>
- UNITED KINGDOM (Academia)** - In Europe, REACH is the overarching regulation.
- There are regulations aimed at specific media, processes or products.
- Development of SCIP database is driven by waste regulation.

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=13)

Are you actively involved in work on managing chemicals in products in supply chains?

Yes:			3		
No:					5
Not sure:					5

Poll 2 Results (N=9)

What does “transparency” linked to chemicals in products mean to you?

Full chemical ingredient disclosure:					5
Full chemical ingredient disclosure in a format where grade 6 education understands and consumer understands:		2			
Only disclosure of toxic substances:		2			

Poll 3 Results (N=12)

In which sector/product value chain, do you think Chemicals in Products information is most needed?

- Electronic and mercury-added products
- Those that expose vulnerable populations.
- Consumer products, particularly products for children and women (toys, cosmetics, household items, textiles, etc)
- Food contact materials.
- R&D and in production itself”

Q2. What sources of information do you use to identify chemicals in products? What further resources do you think are needed to assess the presence and remove and limit chemicals of concern in products?

- CAMEROON (NGO)** - JVE Cameroon is a member of IPEN and benefits from IPEN's shared information in the field of chemical products.
- As resources JVE Cameroon is thinking of capacity building and providing CSOs with adequate equipment for the analysis and sampling of chemicals in products because so far these analyses are done outside the country.
- FINLAND (Government)** - ECHA database, PubChem, USEPA database and the available scientific literature.
- HEJSupport (NGO)** - Number of lists of chemicals of concern, including chemicals recognised as endocrine disrupting chemicals (EDCs) or suggested as potential EDCs prepared by UNEP; the Substitute It Now (SIN) list prepared by ChemSec NGO, among others.
- IRAN (Academia)** - Volumes of Residue Analysis by Springer Verlag.
- Analysis methods for pesticides and plant growth regulators by Gunter Zewig.
- MEAs, IPEN and some sections of the PAN always useful.
- Regulatory toxicologist sources include ECHA- REACH, PMRA, CFIA, OECD, EPA, DPR.
- ISC3 (NGO)** - Convention-lists (Stockholm, Rotterdam), WHO-lists, PAN-research (for pesticides), EU-lists for endocrine disrupters.

SOUTH AFRICA (Academia)	- Rely on information available from the EU, USEPA and NGOs and peer-reviewed literature.
SOUTH AFRICA (NGO)	- Agricultural sources.
SWEDEN (Government)	- First step is to ensure information is available for the contents, i.e., the substances and mixtures used in production. - For this, implementation of the Globally Harmonized System for Classification & Labelling (GHS) is essential.
UNEP (IGO)	- Reliance on the publicly available databases such as the ones provided by ECHA, the USEPA and NIHS, as well as information from the academic domain. - Linking individual chemicals to products, however, remains a challenge.
UNITED KINGDOM (Academia)	- Main source of info is peer-reviewed literature and grey (regulatory) literature.

Poll 4 Results (N=12)

Which of the following sources of CiP information do you use to assess the presence of chemicals in products? (multiple answers)

Regulatory source:	■	■	■	■	■	■	■	■	■	■	9
NGO source:	■	■	■	■	■	■	■	■	■	■	7
International source, such as MEAAs:	■	■	■	■	■	■	■	■	■	■	7
Existing product labels:	■	■	■	■	■	■	■	■	■	■	6
Industry initiative:	■	■	■	■	■	■	■	■	■	■	2
Others:	■	■	■	■	■	■	■	■	■	■	1

Participants mentioned the following sources as useful for CiP information:

- Substitute It Now (SIN) list
- GHS
- CLP
- REACH database
- USEPA lists
- PubChem
- Documents developed in the context of MEAs
- Scientific literature
- PAN lists

Poll 5 Results (N=12)

Do you use any of the following tools in your work to reduce chemicals of concern in products? (multiple answers possible)

Legislation and information system tools (e.g., GHS, restricted substance lists):	■	■	■	■	■	■	■	■	■	■	9
Consumption tools (e.g., sustainable public procurement, consumer information):	■	■	■	■	■	■	■	■	■	■	6
Holistic tools (e.g., life cycle assessment tools, eco-innovation):	■	■	■	■	■	■	■	■	■	■	3
Production tools (e.g., chemical leasing, cleaner production, responsible production):	■	■	■	■	■	■	■	■	■	■	1
None of these:	■	■	■	■	■	■	■	■	■	■	2

Q3. Please share accomplishment and challenges your work on chemicals in products, what have been your accomplishments and challenges?

What recommendations could you provide to those countries and companies where CiP work is still at the initial stage of development, and more generally to further improve the flow of information on Chemicals in Products?

	Accomplishments	Recommendations
ARMENIA (NGO)	<ul style="list-style-type: none"> - Study the reports published by national environmental and investigative journalists. - Conduct product label analysis (e.g. toys, cosmetics, paints), speak with mothers and caregivers who purchase products for 	<ul style="list-style-type: none"> - Broad awareness-raising activities about hazardous substances and alternatives. - Continuation of efforts to ban the hazardous substances.

	<ul style="list-style-type: none"> children to understand popularity and clarify stakeholder awareness. - Hold face-to-face meetings with national agencies, write letters of appeal to the national and the Eurasian Commission authorities and engage different groups of stakeholders. - Results sharing through online platforms and social media platforms. 	<ul style="list-style-type: none"> - Certification procedures to be strictly followed so that the banned/ restricted products do not enter the national market. - Strengthening capacities of the civil society representatives to protect the right of consumers to information and to demand disclosure of information on hazardous chemicals by producers. - Continued experience sharing of the lessons learned by NGOs engaged in similar efforts at the EECCA level.
CAMEROON (NGO)	<ul style="list-style-type: none"> - Organizing an annual press conference during the international week of the fight against lead poisoning. - Raising public awareness of the risks related to the use of empty paint buckets and phytosanitary packaging in households. - Purchasing and sampling of children's items to enforce the regulations in force and draw public attention to the danger of toxic items on children. - Advocacy for compliance with the regulations in force on plastic packaging. - Challenges remain in funding of projects to reduce hazardous chemicals; the involvement of many CSOs in the process; the establishment of a laboratory for the analysis and sampling of chemicals; and the provision of appropriate equipment for analysis; identification and recognition of which pesticides in the list of registered pesticides are HHPs, apart from those listed in the UN convention. 	<ul style="list-style-type: none"> - Establishment of a tax on hazardous chemicals - Develop a national strategy for phasing out HHPs - Organise proactive awareness campaigns on chemicals in product. - Open consultation of stakeholder on the current list of chemicals for refining and adoption.
FINLAND (Government)	<ul style="list-style-type: none"> - CIEL report on sound management of chemicals is relevant for effectively addressing the CiP issues: https://www.ciel.org/reports/chemicalstax/ 	<ul style="list-style-type: none"> - More transparency needed with information on replacement chemicals, publicly or with core scientific community in the field of interest. - Products containing alternatives should be labelled accordingly. - Safe chemicals should be the focal point and sharing information on safer chemicals is critical. - Early stage CiP work should have mechanisms of collaboration with peer-countries/working groups for the sharing of know-how.
HEJSupport (NGO)	<ul style="list-style-type: none"> - Legislation has recently been introduced in Massachusetts, which ban PFAS, BPA, phthalates in food packaging. - Legislation adopted in New York that requires full disclosure of chemicals in hygienic products. 	
IRAN (Academia)	<ul style="list-style-type: none"> - Member of the SCP clearinghouse I involved in helping consumers nationally, regionally, and globally against toxic compounds. - Participated twice in the World Circular Economy conference in Helsinki. 	<ul style="list-style-type: none"> - Government authorities in the MENA/ NENA countries to care about life of people and wildlife.

- Working on issues related to circular economy for chemicals.
- Helped in reduction of toxic pollution in wetlands.
- Cooperated with globally known agencies for pesticides/ chemicals and biocidal products reductions and regulations.

**ISC3
(NGO)**

- Study on sustainable use of plastics is being prepared by Isc3.

- No information about the chemicals in building products used decades ago, recycling is therefore difficult/impossible.
- Documented information about the "ingredients" of building materials should be archived for the next generations.

**SWEDEN
(NGO)**

- Transparency for chemicals of global concern (see e.g. the hazard categories in the CiP Programme scope) that are spread globally in supply chains for materials/products.
- The EU SVHC list contains chemicals that largely mirrors these hazard categories.

Poll 6 Results (N=9)

The GCO II highlights the following potential measures to further address CiP. Please vote for the most needed in your view. Strengthening global CiP approaches:

Harmonised cross-sectoral CiP information sharing protocols:	2		
Include CiP elements in extended producer responsibility policies:		4	
Integrate toxicity considerations into life cycle analysis for products and increase awareness of product designers of chemical selection:	2		
Develop criteria for information disclosure and protecting confidentiality where reasonable:	1		

Poll 7 Results (N=10)

List some of the key challenges you encounter in your work on CiPs?

"Minimum information transparency standard is needed to ensure information on hazardous chemicals in products is available inside and outside the supply chain and throughout product life-cycle"

"difficulties (financial, time, scope, capacities) for the LCA-analysis of specific products. missing awareness/ basics for Circular Economy"

"lack of industry transparency with industry provided information"

"Lots of pesticide residues in consumer products particularly in veggies and fruits and lack of actions by related governments/ authorities."

"Lack of harmonized understanding among all stakeholders within and outside supply chains on what chemicals should be disclosed. This is why a harmonized cross-sectoral minimum disclosure standard would be most helpful."

"Lack of data on chemicals that are currently marketed, their specific use and sometimes also function, lack of data on eco- and human toxicity as well as on exposure pathways."

"Co-ordination between national agencies (ministries, customs agency, regulators); insufficient expertise and hence involvement among CSOs"

"Lack of data and limited research funding to produce the data"

"The sheer lack of data (exposure/occurrence and/or hazard) for the majority of chemicals in use."

"Lack of legislation"

Helpful resources:

- **UNEP Chemicals in Products Programme**
<https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/chemicals-products>
- **SAICM Chemicals in Products Programme**
<http://www.saicm.org/Portals/12/documents/meetings/ICCM4/doc/K1502319%20SAICM-ICCM4-10-e.pdf>
- **Overall orientation and guidance for achieving the 2020 goal of sound management of chemicals**
<http://www.saicm.org/Portals/12/documents/meetings/ICCM4/doc/K1501995%20SAICM-ICCM4-6-e.doc>
- **Guidance for stakeholders on exchanging chemicals in products information**
http://www.saicm.org/Portals/12/Documents/EPI/Guidance%20for%20Stakeholder%20in%20Exchanging%20CiP%20Information_October2015.pdf
- **SAICM Emerging Policy Issues**
<http://www.saicm.org/Implementation/EmergingPolicyIssues/ChemicalsInProducts/tabid/5473/language/en-US/Default.aspx>
- **The Business Case for Knowing Chemicals in Products and Supply Chains**
<https://wedocs.unep.org/handle/20.500.11822/27795#:~:text=The%20Business%20Case%20for%20Knowing%20Chemicals%20in%20Products%20and%20Supply%20Chains,-United%20Nations%20Environment&text=The%20report%20specifies%20the%20costs,products%20and%20using%20safer%20substitutes.>
- **Overview report : a compilation list of chemicals recognised as endocrine disrupting chemicals (EDCs) or suggested as potential EDCs**
<http://wedocs.unep.org/handle/20.500.11822/12218>
- **The Substitute It Now (SIN) list**
<https://chemsec.org/business-tool/sin-list/#:~:text=The%20SIN%20List%20consists%20of,human%20health%20and%20the%20environment.>
- **EWG's (Environmental Working Group) Skin Deep database which lists 64,480 products**
<http://www.ewg.org/skindeep/>
- **SubSport Substitution Support Portal**
<http://www.subsport.eu/>
- **GoodGuide**
www.goodguide.com
- **BASTA**
<http://www.bastaonline.se/searchpage-en/?lang=en>
- **GreenScreen Certified for Textile Chemicals**
<http://www.greenscreenchemicals.org/certified>
- **Centre of Environmental Solutions**
<http://chemicals.ecoidea.by/what-in-my-products>
- **Understanding Chemicals in Products policy brief**
http://www.saicm.org/Portals/12/Documents/Publications/SAICM_Policy_Brief_CIP.pdf
- **Towards a Safe Circular Economy Without Hazardous Chemicals**
https://www.naturskyddsforeningen.se/sites/default/files/dokument-media/towards_a_safe_circular_economy_without_hazardous_chemicals_0.pdf
- **SAICM Overarching Policy Strategy**
<http://www.saicm.org/Portals/12/documents/saicmtxts/SAICM-publication-EN.pdf>
- **Plastic and toxic additives, and the circular economy: the role of the Basel and Stockholm Conventions**
[file:///C:/Disc%20D%20December%202017/Documents/news/UNEP-CHW.14-INF-29-Add.1.English%20\(1\).pdf](file:///C:/Disc%20D%20December%202017/Documents/news/UNEP-CHW.14-INF-29-Add.1.English%20(1).pdf)

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 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 or UCT at uctcops@outlook.com.

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

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