

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: Industry initiatives and information sharing on chemicals in products in the supply chain.

Knowing the chemical composition of products is a major challenge for the manufacturing industry, as well as their downstream supply chain. Case studies can assist various stakeholders in engaging with issues of information, transparency, and risk management. The Automotive Industry has faced this challenge for more than 20 years and are implementing unique systems and processes at a global level. The intention of this discussion was to elaborate on the lessons learned over many years and whether these could be examples used by other sectors or stakeholders. The discussion focused on the automotive sector, its success at information sharing on chemicals in products in the supply chain and why it is difficult for other industries to follow this example.

ABOUT THE PRESENTER



Timo Unger

As engineer for Recycling Technology by training, Timo has worked over 20 years in the automotive industry and today for the European R&D Center of Hyundai & Kia Motor Company as Manager, Environmental Affairs. He is representing Hyundai in numerous industry working groups concerned with environmental issues, including the Steering Committee of IMDS, the International Material Data System. He also Chairs the Automotive Industry Task Force on REACH and the Working Group on Materials & Substances of ACEA, the EU vehicle manufacturers'.

2021 DISCUSSION 1 ATTENDANCE BREAKDOWN

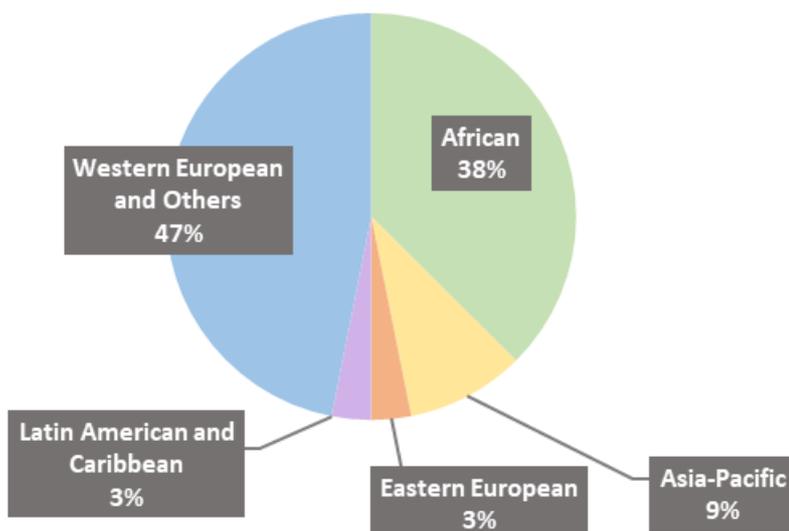
TOTAL ATTENDEES FOR 2021

DISCUSSION 1: 32

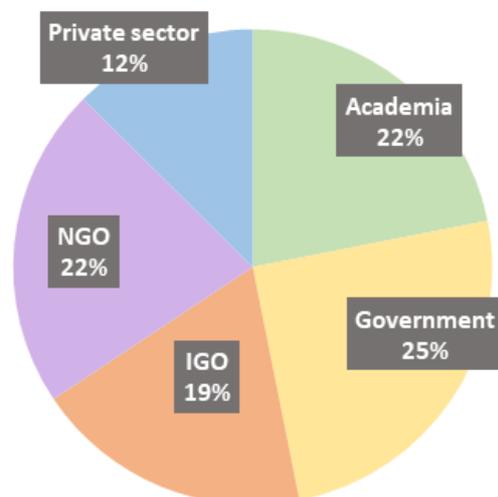
Female – 59%

Male – 41%

Regional representation



Stakeholder representation



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

Chemicals in Products Community of Practice 2021 Discussion 1 Summary and looking ahead

1. Participants identified **quality and reliability of the data and information** received as extremely important for chemicals management. Defining quality was raised as an issue. The quality aspects of currently utilised systems are a major focus and major investments are being made to improve the quality of the data being received by the system from manufacturers. An additional measure to motivate manufacturers to enter data into the system is with-holding of payments to suppliers who do not enter data into the IMDS system. This is a way to make sure as much information is being given to manufacturers in the vehicle industry as possible.
2. **Full material declaration, legislation and compliance** continue to be highlighted as challenges for low- and middle-income countries. With resources and capacity being low in these countries it is important to find ways that full material declaration can become possible. The global automotive declarable substance list (GADSL) is an example of how such a process can be done.
3. When it comes to the **information that waste operators need**, it is very difficult to determine. Waste operators often deal with multiple products from different industries (i.e., vehicles, e-waste and plastic waste). These products all require different information and so it becomes a challenge to indicate the exact information needed for each waste operator. The automobile industry are making efforts to start conversations with waste operators, and to determine how to move forward in providing the necessary information.

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 INPUTS FROM PARTICIPANTS ARE PRESENTED UNDER EACH:

Q1. In your sector or organization, what do you think are the key issues to ensure the reliability of the information being provided for decision-making?

- | | |
|-------------------------------------|--|
| FINLAND
(Government) | - Selection of important/correct indicators is critical because of the large amount of data/information (information quality?) that would come in for decision-making and the updates with regards to relevance of indicators. |
| GAMBIA
(Government) | - Reliability is very important because sometimes incorrect data can be received from manufacturers and some information can be hidden.
- Quality Control of materials is really a big issue particularly in the developing world. |
| GERMANY
(NGO) | - ISC3 looks at sustainability in a holistic way.
- It is important to consider different aspects such as impacts on environment and health, economic (prices), scarcity of resources, possibility of recycling or reuse of a product, also social aspects as influence on specific groups (workers, local population etc.).
- In that case, the reliability of information for is based on different angles to balance the whole picture. |
| SOUTH AFRICA
(Government) | - Reliable information provided on one platform would be helpful.
- It is often difficult to try and merge different databases or reporting structures.
- A facility to ground truth the data before it is submitted into a central database would help so that the incorrect data is filtered out ensuring that the data is not skewed would be great. |
| SWEDEN
(Government) | - There must be clear ownership and accountability for each data entry, which also means traceability is required.
- In the car industry supply chain trust and thereby reliability is probably helped by the strong purchasing power of the car industry.
- It would be harder for an industry with less purchasing power to set the same requirements on their suppliers and being able to rely on the data supplied (the supplier can risk losing the customer).
- Reliability needs to be verifiable. |
| UNITED KINGDOM
(Academia) | - The topic here is the reliability of data, but this may be tied up to quality control of processes to manufacture materials.
- For example, the non-intentionally added substances content in plastic polymers is linked to the manufacturing process, as well as to how well it is controlled.
- 100% knowledge is unachievable in any situation.
- A common source of controversy and disagreements is how this uncertainty is handled or accounted for, as the level of conservatism or otherwise will be linked to the perspective of the individual or group considering it (e.g. manufacturer/industry vs public health). |
| PRESENTER'S NOTES: | - Question: Do you have any kind of "trigger point" or warning for information that is potentially false in your system? <ul style="list-style-type: none">- Yes.- For example, if there is a lead acid starter battery reported in the system, and there is no lead reported in that battery, our systems will alarm us. |
| | - Question: What role does legislation play in the reliability of data in your industry? <ul style="list-style-type: none">- Usually companies are mostly looking into their own legal environment which is good if you source products from Europe and are located in Europe.- However, if you are in Europe and your Chinese supplier doesn't know about EU legislation, you may have an issue. |
| | - We apply the data ownership principle - you are responsible for what you are reporting. |
| | - Question: would you say then that international conventions also have a key role to play? <ul style="list-style-type: none">- Yes, the conventions are important and global players prefer globally harmonised requirements. |

- BUT for the Stockholm Convention for example, we must realize that the national transpositions are not transparent.
- There is no reliable overview about the status per country.
- **Question: Do you think being required to provide information about chemicals in articles, parts etc. could act as a driver to reduce this complexity? Is this complexity strictly essential? Is there something similar to the concept of essential use of chemicals when designing materials?**
 - The essential use is defined by the market (the consumers).
 - Not everybody likes yellow and leather.
 - Some markets prefer cheap cars with less airbags and others full prefer full equipment.
 - If we would limit the varieties of our products, we would limit our market success.
- **Question: Does this global system of information sharing help identify and reward these potential win-wins between QC and data reliability?**
 - Yes, it does.
 - If we have early and reliable information, we can start early identification of possible quality issues, substitution strategies, advocacies etc.
 - The earlier we start with these processes, the less costly it becomes and the better the quality of data from our suppliers, the more reliable and tailored is our advocacy or substitution.

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)

What defines "reliability" of information for you?

1. "Generation needs to be traceable and the information needs to be verifiable."
2. "That during generation of information, no shortcuts are taken, and the procedure has followed quality standards and has been audited."
3. "Reliable data are first and foremost transparent, i.e., sufficient information is supplied that would allow another evaluator to reproduce the assessment independently."
4. "Research and test in practice"
5. "Reliability means: Is the data we have received correct, up to date and not hiding any information we are requesting because we need it to achieve our goals."

Poll 2 Results (N=4)

What are some challenges that your sector/organization faces when dealing with reliability of information?

(multiple answers allowed)

Lack of legal requirements:	3
Numerous end product manufacturers:	3
Lack of cooperation:	3
Different quality standards:	3
Heterogenous industry:	1
Dynamic supply chain:	1
Other:	1

Q2. What are the strengths, weaknesses, and opportunities of industry cross-sector data exchange for sustainable chemicals and waste management? Your comments could include what information is needed by waste operations (including recycling).

FINLAND
(Government)

- Transparency and adhering to quality can be a strength or a weakness if not included into practice for the industry/stakeholders.
- Data exchange can only be efficient if exchange is done following similar standard requirements.
- Industry has the most critical role here because only via industry does the information flows to regulators and stakeholders.

GERMANY (NGO)	<ul style="list-style-type: none"> - Having complete information on substance content of a part or article is essential for circular economy. - There can be no material recycling without this information.
IRAN (Academia)	<ul style="list-style-type: none"> - For some Middle East (ME) countries there are no clear regulations for these issues and no enforcement. - Some new enterprises compete for E-waste recycling, as an example, and we cannot talk about availability of any data for them. - In most ME countries only a small portion of E-waste, etc. are now recycled. - These countries are mostly at the starting point, unfortunately.
SWEDEN (Government)	<ul style="list-style-type: none"> - Data exchange is good. - For companies with limited resources, information that the material/part/component fulfils legislative and possibly other standards for "sound chemicals management" is easier to use than a full material disclosure that they must check against requirements.
PRESENTER'S NOTES:	<ul style="list-style-type: none"> - Question: how are cross-sector data exchange and harmonization interlinked? <ul style="list-style-type: none"> - Again, larger industries often are indirectly linked with each other, e.g. by sharing the same or a similar supply chain. Latest at the beginning of the chain, at the chemical industry, all the different sectors are sharing the same suppliers...the material / chemical manufacturers. - Having many different systems, standards, processes and tools will automatically generate a high workload down the chain because these companies will have to satisfy many different requirements instead of only one (or at least only a couple). - So, to avoid that a harmonisation of different standards etc would generate a win-win situation. BUT - This is a very complex task which sounds so simple but the deeper you dive inside the more difficult it becomes. - Some challenges with only using legislative compliance is that your product is, for example, REACH compliant, but the validity of this letter is only for one day and you don't know whether the product is still compliant tomorrow. - It is less resource consuming to have more information rather than less. - It is increasing the quality and at the same time decreasing the workload in the supply chain to continuously update their information.

Poll 3 Results (N=1)

What do you see as the key role industry plays in CiP information exchange?

1. "Industry is a key enabler, as they generate and hold CiP information."

Helpful resources:

- **Understanding Chemicals in Products – UNEP Policy Brief:**
http://www.saicm.org/Portals/12/Documents/EPI/CiP_policy_brief_Nov2019.pdf
- **The Chemicals in Products Programme: Guidance for stakeholders on exchanging chemicals in products information:**
http://saicm.org/Portals/12/Documents/EPI/Guidance%20for%20Stakeholder%20in%20Exchanging%20CiP%20Information_October2015.pdf
- **Timo Unger's presentation:** <https://saicmknowledge.org/sites/default/files/meterial/CIPCOP~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 (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 or UCT at uctcops@outlook.com.

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

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