



COMMUNITY OF PRACTICE ON CHEMICALS IN **PRODUCTS**

Organized by the SAICM Secretariat and the University of Cape Town

Chemicals in Products (CiP) Community of Practice (CoP) 2020 DIGEST COMPILATION



Division of Environmental Health
School of Public Health and Family Medicine
Isikolo Sempilo Yoluntu kunye Namayeza Osapho
Departement Openbare Gesondheid en Huisartskunde

UNIVERSITY OF CAPE TOWN
UNIBESITHI TAKSAPA - UNIVERSITEIT VAN KAAPSTAD



TABLE OF CONTENTS

INTRODUCTION	3
ABOUT THE CIP COP	3
SAICM/UCT CIP COP 2020 DISCUSSION FORUM SCHEDULE.....	4
Discussion 1 Digest: Mapping the CiP Landscape.....	5
Discussion 2 Digest: Enforcement of products	13
Discussion 3 digest: Management on classes of chemicals and flame retardants in the textiles sector ...	19

INTRODUCTION

In 2020, the CiP CoP successfully hosted four online discussions on topics specific to Chemicals in Products. Collectively, these discussions saw participation from 96 members from various regions such as, Africa, Western European and Other Group, Asia-Pacific, Eastern European and Latin American and Caribbean. The members represented various sectors such as, academia, intergovernmental organisations, non-governmental organisations, governments and private sectors within CiP. From these discussions four summary digests were produced for information, using as a resource and sharing with your networks. This document is a compilation of the 2020 CiP CoP discussion digests.

ABOUT THE CIP COP

The Strategic Approach to International Chemicals Management (SAICM) secretariat and the Environmental Health Division at the University of Cape Town (UCT) established a Community of Practice (CoP) in 2020 to address issues and foster discussions with relevant stakeholders related to chemicals in products (CiPs). This CoP builds on the work and experience UCT has had since 1997 in leading a CoP on pesticides in general.

The objective of the CiP CoP is to foster discussions that will identify key issues related to chemicals in products as well as to enable knowledge sharing, best practice, case studies and tacit knowledge amongst participants of this CoP. This CoP is established under the framework of the SAICM project, GEF 9771: Global Best Practices on Emerging Chemical Policy Issues under SAICM, funded by the Global Environment Facility (GEF). The CoPs intention is to provide a platform for multiple stakeholders to engage with each other on CiPs, as well as contribute to the Beyond 2020 discussions and deliberations.

HOW TO JOIN THE CIP COP

In 2020 the discussions were held in Microsoft Teams, however, in 2021 the CoP discussions will take place on Cisco WebEx.

If you have not signed up already and would like to become a member of the CoP to:

- Participate in online discussions with representatives from all relevant sectors, and if you wish, have the possibility to lead on a relevant discussion.
- Have first-hand access to up-to-date information produced by SAICM and other stakeholders on the SAICM emerging policy issues and other issues of concern.
- Actively contribute to peer-to-peer learning exchanges on best practices, case studies and experiences on chemicals management.
- Contribute to the development of new initiatives towards SAICM objectives and the SDGs.
- Receive summaries of discussions held.

Sign-up on the SAICM Knowledge website here, <https://saicmknowledge.org/community>.

SAICM/UCT CIP COP 2020 DISCUSSION FORUM SCHEDULE

No	Date	Topic	Presenter	Facilitator
1	17 September	Mapping the CiP Landscape	Wenjia Fan, UNEP Sandra Averous-Monnery, UNEP	Andrea Rother
2	19 November	Enforcement of products	Anna Fransson, Keml	Andrea Rother
3	10 December	Management on classes of chemicals and flame retardants in the textiles sector	Yiliqi, NRDC	Andrea Rother

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.

COMMUNITY OF PRACTICE ON CHEMICALS IN PRODUCTS

Organized by the SAICM Secretariat and the University of Cape Town

Issue: 1 of 2020

Discussion date: 17th September 2020

Discussion 1 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. **To view the PowerPoint presentation of the discussion, click [here](#).**

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.



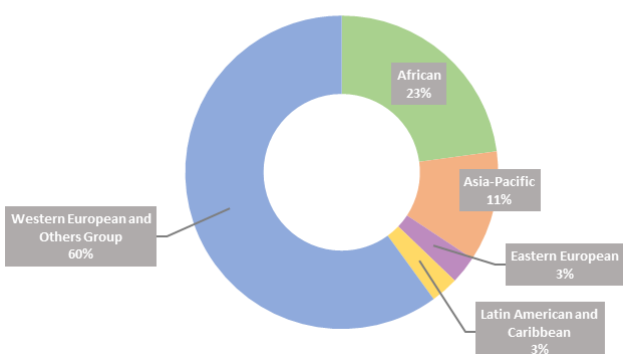
Wenjia Fan joined UNEP as a Junior Professional Officer in June 2018. Before she joined UNEP, she worked for the Ministry of Ecology and Environment of China, for approximately 5 years. She focused on policy research on international environmental governance and facilitated green supply chain management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

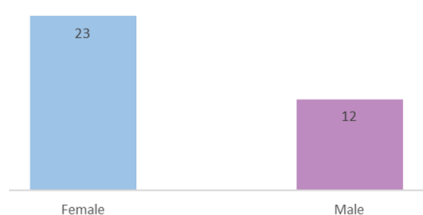
DISCUSSION 1 ATTENDANCE BREAKDOWN

TOTAL ATTENDEES FOR DISCUSSION 1: 35

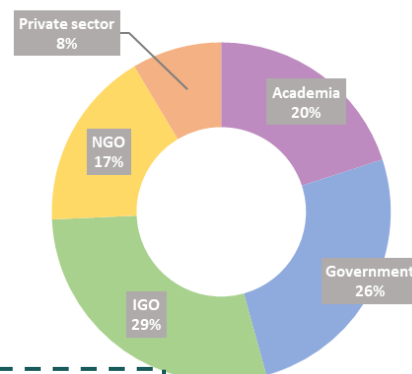
Regional representation



Gender representation



Sector representation



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

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

- 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>**
- 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 Minimata 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**.
- 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**.
- 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 Minepded 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)	- Southern African region has limited exchange of information on what chemicals are in products imported and exported in the region.
SWEDEN (Government)	- No current overarching basic chemicals framework or legislation.
	- 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.

	<ul style="list-style-type: none"> - MEAs, IPEN and some sections of the PAN always useful. - Regulatory toxicologist sources include ECHA- REACH, PMRA, CFIA, OECD, EPA, DPR.
ISC3 (NGO)	<ul style="list-style-type: none"> - Convention-lists (Stockholm, Rotterdam), WHO-lists, PAN-research (for pesticides), EU-lists for endocrine disrupters.
SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - Rely on information available from the EU, USEPA and NGOs and peer-reviewed literature. - Funding for research on chemicals in products is limited.
SOUTH AFRICA (NGO)	<ul style="list-style-type: none"> - Agricultural sources.
SWEDEN (Government)	<ul style="list-style-type: none"> - 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)	<ul style="list-style-type: none"> - 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)	<ul style="list-style-type: none"> - 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 MEAs:	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

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 	<ul style="list-style-type: none"> - Broad awareness-raising activities about hazardous substances and alternatives.

	<ul style="list-style-type: none"> journalists. - Conduct product label analysis (e.g. toys, cosmetics, paints), speak with mothers and caregivers who purchase products for 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"> - Continuation of efforts to ban the hazardous substances. - 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. 	<ul style="list-style-type: none"> - Government authorities in the MENA/ NENA countries to care about life of people and wildlife.

- Participated twice in the World Circular Economy conference in Helsinki.
- 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://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.

COMMUNITY OF PRACTICE ON CHEMICALS IN PRODUCTS

Organized by the SAICM Secretariat and the University of Cape Town

Issue: 2 of 2020

Discussion date: 26th November 2020

Discussion 2 Digest Enforcement in Products

Enforcement is essential, and without enforcement any law will be ineffective. This also calls for enforcement of legislation regarding chemicals – as substances, mixtures and in articles. Many chemicals are incorporated in finished products, or articles, during the production process. Examples could be painted and lacquered furniture, polymers and metals in electric and electronic products, dyes in textiles, flame retardants and plasticizers in plastic products, etc. Articles may pose a risk due to their chemical contents. In some countries specific substances have been regulated in specific groups of articles, but in general they are to a large extent unregulated with regards to their chemical contents. This discussion reviewed these issues and looked for solutions. **To view the PowerPoint presentation of the discussion, click [here](#).**

ABOUT THE PRESENTERS



Anna Fransson is a Senior Adviser at the international unit at the Swedish Chemicals Agency (KemI). She has more than 25 years of experience from working with preventive chemicals control, 10 of them working as an inspector at the Agency.

Her current role as an adviser includes support to the Ministry of Environment in Sweden in relation to the Minamata convention and SAICM. She has also worked with capacity building in several countries and regions. Ms Fransson is chair of the steering group to the SAICM Chemicals in Products (CiP) programme.



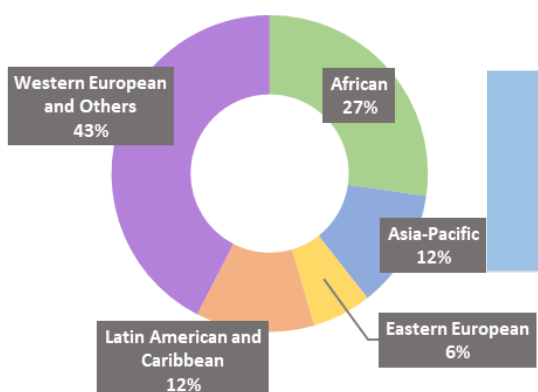
Stéphane Content is graduated in Chemistry and got his PhD in the field of photochemistry in 1998 from the Université Libre de Bruxelles. He also did a post-doctoral stay at University of California San Diego (UCSD) the field of sensors. He worked for the

past 11 years at Procter & Gamble in analytical, product design and process development department for liquid detergent development. Then he joined the European Chemical Industry Council (Cefic), he is also representing International Chemical Council Association (ICCA), and supported for two years Silicones Europe before joining the Plasticisers sector. For 5 years he is manager of Product Stewardship working on communication in the value chain and the interface between chemical product and waste legislation. Stéphane is also a member of the UNEP CiP Steering committee.

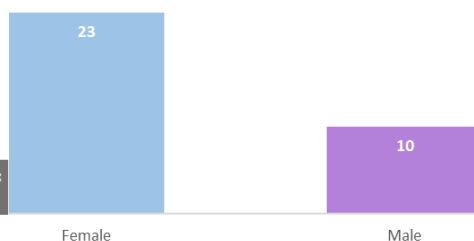
DISCUSSION 2 ATTENDANCE BREAKDOWN

TOTAL ATTENDEES FOR DISCUSSION

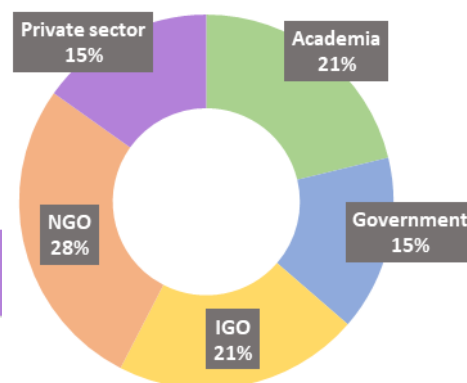
Regional representation



Gender representation



Sector representation



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

Chemicals in Products Community of Practice Discussion 2

Summary and looking ahead

5. Many participants stated that **concrete and comprehensive chemicals legislation had not been implemented** in their respective countries. It was expressed that most low- and middle-income countries (LMICs) have struggled to implement such legislation. In countries where legislation has been implemented, it was noted that this legislation may not be comprehensive enough and has gaps that result in a lack of sound chemicals and waste management. Many participants stated that while their country may ratify international agreements, implementation and enforcement of these agreements is where the process falls short.
6. A key point mentioned by participants was the **need for enforcement tools that translate to the context of all countries**. Current tools for enforcing and implementing chemicals legislation that LMICs have access to are mostly EU focused and do not translate well to other countries and contexts. It was suggested that these tools could be adapted to fit different contexts and that perhaps the new EU Chemicals Strategy may be a good starting point for this. Suggestions of implementing such strategies in conjunction with the Globally Harmonized System of the Classification and Labelling of Chemicals (GHS) were highlighted as a means to improve implementation and enforcement.
7. A key point raised was on the **avoidance of double standards** through industry initiatives and government regulations. If there was a **global and harmonized approach on criteria to communicate in the value chain**, across sectors, industry initiatives would then be beneficial for all countries and all sectors. This will, however, will take some time and training for the correct implementation in all countries. Ultimately, this would help with enforcement (globally) if successful.

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. What actions are undertaken in your country, region, or sectors to ensure compliance with relevant legislation?

Are there gaps in existing legislation, regulations, or policies to address enforcement of chemicals in products in your country /region / sector?

BANGLADESH (NGO)	- No specific legislation for toys in Bangladesh
HEJSupport (NGO)	- Lead in paint is regulated in many countries now but lead is a mixture and not an article. - Cosmetics are not considered as articles either though many companies now disclose ingredients in cosmetics.
INDIA (NGO)	- RoHS guidelines are there for e-waste management purposes. - Standards are notified for some chemicals like phthalates in baby feeding bottles. - No comprehensive CiP guideline/legislation. - Some dyes are banned in textiles. - Recent ban of certain BFRs (commercial octa and commercial penta BDE) will also positively impact their use. - Major issue related to CiP comes in recycling of plastics. - No guidelines for plastic recycling yet and mixing of hazardous plastics with other plastics during recycling is an issue of great concern.
IRAN (Academia)	- Ministry of health is responsible for regulations and enforcement of chemicals in products - However, not yet properly developed. - Numerous related academic/ scientific papers/ discussions are happening in this area of research. - Delay to get regulations and enforcement in action again due to the revolution. - Many activities occurring about chemicals regulations and enforcement in government organizations and academies but not synchronize with each other.
ISC3 (NGO)	- Many directives in Europe, from which REACH is the biggest. - No united single policy and there are still gaps (e.g. in building sector the issue of fire/smoke toxicity coming from chemicals in building materials is not regulated at all; flame retardants and additives). - REACH is regulating substances of high concern. - The implementation was planned to be monitored by sample testing of about 5% of all substances on the market.
JAMAICA (NGO)	- No legislation on chemicals in products. - Guidelines on standards for chemicals specific to narcotics are in place (https://moj.gov.jm/laws/precursor-chemicals-act). - There is a regulatory authority for Hazardous Substances. - Political barriers to implementing GHS are the informal industries are on the rise with checks not being done. - The notion of economic benefits over health implications is one that is ignored in most political spheres with limited informed consultancy to create the link to the existing gap of forging science with policy in the decision-making process.
PERU (IGO)	- In 2004 a law was passed that prohibits and sanctions the manufacture, import, distribution, and commercialization of toxic or dangerous toys.
SOUTH	- A challenge is that legislation linked to chemicals in products does not currently exist.

Q2. How can those initiatives contribute to a better enforcement of regulation in the world regarding the presence of substances in articles?

HEJSupport (NGO)	<ul style="list-style-type: none"> - More communication is needed to disclose information outside the supply chain, including to consumers. - Enforcement of the regulations should serve people and ensure they are safe from toxic chemicals. - Industry should think how to improve transparency both inside and outside the supply chain. - NGOs prepared their vision on how to disclose information on SVHC in products and was presented by the Proactive Alliance.
INDIA (NGO)	<ul style="list-style-type: none"> - Lack of political will and weak management. - Insufficient manpower. - Inter ministries cooperation.
IRAN (Academia)	<ul style="list-style-type: none"> - Some initiatives mostly from the ECHA but ECHA and other EU chemicals regulations agencies are mostly for EU and not for the whole world. - Even though there are good REACH sections now in many Asian countries but no help for the Middle East North Africa yet. - It would be good if all these EU initiatives were prepared to give help globally. - As an example, there are good discussions going between China and EU (Chemical Regulatory Annual Conference – Asian Helsinki Chemical Forum) to cover many chemicals regulations issues. - In many LMICs, there are good regulations, but problem is enforcement.
ISC3 (NGO)	<ul style="list-style-type: none"> - Developed countries should have a legislation forbidding the exports of problematic products or waste (hazardous stuff should not be sold to countries where it will be used).
JAMAICA (NGO)	<ul style="list-style-type: none"> - The framework that EU has developed is one that can be adopted and contextualize in each country. - It is comprehensive and shows links between industry and monitoring systems. - This is needed in the Caribbean complimented with GHS. - Information will be provided to industry, government, and civil society and this can be a driving force in regulation discussions for the future.
SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - New EU Chemicals Strategy will be a step in the direction of removing double standards. - What is needed is that the Chemical Strategy parts that are relevant for LMICs is communicated to these countries.
SWITZERLAND (IGO)	<ul style="list-style-type: none"> - All these tools are addressing important gaps and definitively have the potential to contribute to closing these gaps. - It is important to ensure that such tools can be applied in different regulatory and regional contexts.
SWEDEN (Government)	<ul style="list-style-type: none"> - Complexity with many products with different materials and many actors changing rapidly over time. - Tools will help companies to comply if functioning well. - For example, importers of not very complex products, such as clothes, still need a lot of information to ensure compliance with the EU legislation. - Reducing the cost of compliance will increase compliance.
TOGO (Academia)	<ul style="list-style-type: none"> - In developing context, communication on these tools should be promoted and include in activities. - It will improve enforcement if policy makers take time to be informed and based on fruitful experiences coming from European countries. - International project coordinator having a valuable part of researcher from local universities would help to promote close collaboration between ministries officials and academics.

Poll 4 Results (N=6)

What is needed in your country/region to improve communication in the value chain to facilitate enforcement of product groups such as toys, electronics, textiles, food packaging, etc?

“A structured and harmonized approach.”

“Stakeholders involvement, mass media communication, record keeping, and accountability.”

“Monitoring facilities such as XRF instruments for customs and other officers that control products.”

“A better, wider and stronger communications between government organisations particularly Ministry of Foreign Affairs and academia.”

“More public (media) pressure.”

“A register of what chemicals are in the products imported into the country.”

Poll 5 Results (N=8)

What communication approaches would work best for SMEs?

“Capacity building and information sharing platform.”

“Dialogue initiatives between agencies and specific product sectors, including larger as well as smaller companies can be helpful, since the larger ones can serve as forerunners.”

“Strict control measures and financial incentives for sustainable technologies.”

“Freely available, easy to use.”

“Providing information/training when licensing SMEs.”

“Informational campaigns through industry organisations or local governmental authorities.”

“Fines, incentives, strict enforcement particularly in developing countries.”

“Round table discussions with their associations and individual meetings with their companies.”

Poll 6 Results (N=10)

In case the blockchain technology can demonstrate technical feasibility, what should happen to facilitate enforcement in your region? (participants could tick multiple options)

Develop guidance on how to use:



Provide the tool free of charge to local authorities:



Helpful Resources:

- Enforcement of chemicals in products in Sweden, general information from Kemi: <https://www.kemi.se/en/enforcement>
- ECHA (European Chemicals Agency), Forum Enforcement Projects (EU wide cooperation projects): <https://echa.europa.eu/fr/about-us/who-we-are/enforcement-forum/forum-enforcement-projects>
- Kemi Guidance document “Enforcement of legislation on chemicals placed on the market”: <https://www.kemi.se/en/publications/guidance-on-national-chemicals-control-for-other-countries/enforcement-of-legislation-on-chemicals-placed-on-the-market>
- UNEP Guidance’s on chemicals control contributing to national progress and safety, one guidance is addressing “Enforcement of chemicals control legislation”: <https://www.unenvironment.org/resources/report/guidance-chemicals-control-contributing-national-progress-and-safety>
- Example 1: Proactive Alliance: <https://www.proactive-alliance.info/mission-goals>
- Example 2: the project Chemchain: <https://www.chemcha.in/>
- Example 3: Chemreg: <https://chemreg.net/>

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>

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.

COMMUNITY OF PRACTICE ON CHEMICALS IN PRODUCTS

Organized by the SAICM Secretariat and the University of Cape Town

Issue: 3 of 2020
 Discussion date: 10th December 2020

Discussion 3 digest

Topic of Discussion: Managing PFAS as a Chemical Class in the Textiles Sector

The textile industry, as one of SAICM’s priority sectors, uses a large amount of chemicals across the production stages to achieve various appearances, quality, and functions in products. PFAS--a large chemical class characterized by toxicity, persistence, mobility, and the ability to bioaccumulate-- are widely used in this sector. With growing global attention and efforts on eliminating PFAS, a class-based approach is considered efficient and effective. The intention of this discussion is to identify the best approach to reducing PFAS exposure and pollution associated with the textile sector, with the focus on why and how PFAS should be managed as a chemical class in the textile sector. **To view the PowerPoint presentation of the discussion, click [here](#).**

ABOUT THE PRESENTER

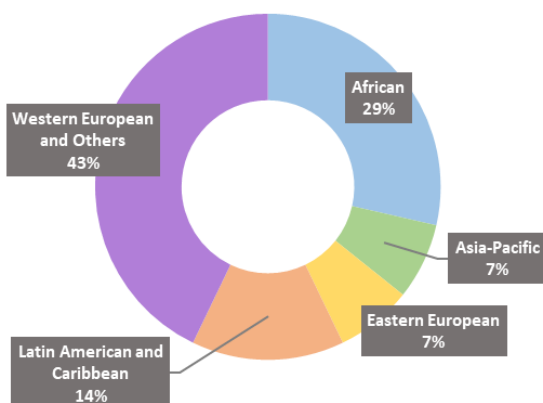


Yiliqi leads a green supply chain initiative at NRDC, which calls on corporations to take responsibility for environmental impact of their supply chain, especially their manufacturers located abroad. Her current work focuses on addressing the environmental impacts of the textile industry. She holds dual bachelor’s degrees in Environmental Science and Public Relations from East China Normal University and a master’s degree in Environmental Policy Design from Lehigh University. She is based in Washington, D.C.

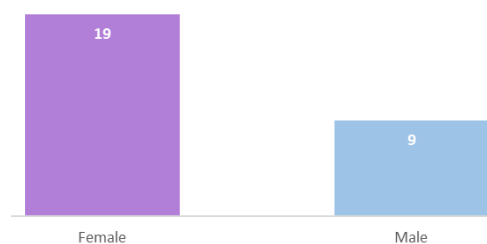
DISCUSSION 3 ATTENDANCE BREAKDOWN

TOTAL ATTENDEES FOR DISCUSSION

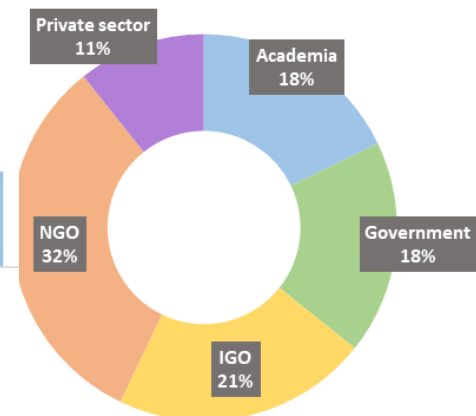
Regional representation



Gender representation



Sector representation



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

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

8. The discussion highlighted that **many countries are importing products containing PFAS** but not necessarily manufacturing these products. What was highlighted is that there are many steps in the manufacturing process and often PFAS is used in the beginning steps but may not necessarily be mentioned as a chemical in the end product. Therefore, there could be a number of products being imported that contain PFAS but governments and regulators may be unaware of. For many participants, the **class-based approach to manage PFAS** was new and it was noted that research and development, awareness raising, and capacity building were the main needs for many countries when considering this topic.
9. A key point raised by participants was **the role of multinational brands and their responsibilities in eliminating or replacing PFAS with safer alternatives**. The success in PFAS elimination needs to be achieved with global efforts that includes all stakeholders. There is a need to communicate to a wide range of stakeholders in a country that there are many steps in the manufacturing process that could result in importing products that contain PFAS.
10. When it comes to **essential functions of PFAS** many participants stated that fire-resistant materials and health care equipment would be included as essential uses in countries. It was highlighted that while alternatives to PFAS do exist, some of these alternatives have not been well studied in terms of health and environmental impacts. Thus, there is still a **need for safe alternatives to PFAS**. It was emphasized that managing and restricting PFAS as a chemical class could prevent the substitution of a few of the regulated PFAS with another type of PFAS that have similar negative impacts on public health and the environment. Many participants expressed that current PFAS uses in countries should not be considered essential as either safer alternatives exist for those uses, or the health and environmental impact of PFAS is too great to be considered essential.

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. How are PFAS actively monitored and managed in your country, regions, or sector? What have been the accomplishments and challenges in your related work?

ARMENIA (NGO)	<ul style="list-style-type: none">- PFAS are not actively monitored in Armenia.- Management is in frame of general chemicals management.- General awareness about this class of chemicals and public demand for info (labelling) is the starting point.
BANGLADESH (NGO)	<ul style="list-style-type: none">- PFAS is the new issue in Bangladesh.- It has been found in textile wastewater and industries waste water.
FINLAND (Government)	<ul style="list-style-type: none">- PFAS are regulated in Finland as per the EU REACH regulation.- Restrictions on PFOS and PFOA and its related chemicals, and C6 siloxanes are already in place under REACH.- PFOS and its salts are listed in Annex B to the Stockholm Convention and PFOA, its salts and related compounds are listed under Annex A.- Monitoring assessments are conducted – e.g. PFAS levels in commercially relevant fresh and seawater fish species were investigated during 2009–2010 and 2016-2017.- This programme is relevant for studying bioaccumulation of PFAS in biota.- Main challenge is the unknown PFASs.- Analytical methods are available only for partial PFAS homologues, so the determination of all PFASs has been a challenge.- Research is being carried out to address these knowledge gaps in Finland and internationally.
GERMANY (NGO)	<ul style="list-style-type: none">- REACH includes some substances but not all of them.- There are EU-lists for substances of concern (which are not binding).- A proposal for ban of PFAS and PFOA within EU came only this year (from five countries), but there are still discussion on Chromtrioxid (https://echa.europa.eu/de/-/five-european-states-call-for-evidence-on-broad-pfas-restriction).
IRAN (Academia)	<ul style="list-style-type: none">- PFAS can be found in products for outdoor gear to anti-stick cookware, ski wax, grease-proof food wrapping, ball bearings, and lubricants.- PFASs – shorthand for per- and polyfluoroalkyl substances – mostly end up getting into the environment.- Lots of academic papers started to publish but have not heard yet about any regulations and enforcement here.
SOUTH AFRICA (Academia)	<ul style="list-style-type: none">- South Africa is banning the use and importation of PFAS because they do not use or manufacture with PFAS!- Problem is that many products containing PFAS are imported with no system in place for managing chemicals in products.- Challenge in South Africa is that government feels removing products with PFAS would severely impact on the economy and poor populations.- A lot of "awareness raising" is needed for the decision makers.
SWEDEN (Government)	<ul style="list-style-type: none">- Fire-fighting foams is an important emission source, at least historically.- EU has restrictions on the use of some PFAS and restrictions on more are under preparation EU PFAS ban.- Class-based approach can be for the whole PFAS group or only part – e.g. lon-chain.
SWITZERLAND (IGO)	<ul style="list-style-type: none">- PFOs are listed under Annex B of the Stockholm Convention, and PFOA are listed under Annex A of the Stockholm Convention.

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)

How are PFAS used in your country?

We import products with PFAS in them but do not manufacture products with PFAS:	■	■	■	■	■	■	6
We manufacture and import products with PFAS:	■	■	■	■	■	■	4
We manufacture products with PFAS:	■	■	■	■	■	■	2
None of the above:	■	■	■	■	■	■	1

Poll 2 Results (N=8)

Are you implementing the class-based approach in managing PFAS?

We have never heard of the class-based approach:	■	■	■	■	■	■	6
We are aware of the class-based approach and are considering implementing it in managing PFAS:	■	■	■	■	■	■	1
We are aware of the class-based approach but are not considering implementing it in managing PFAS:	■	■	■	■	■	■	1

Q2. Who are the stakeholders involved in managing PFAS emissions and exposure either from applying PFAS in the manufacturing process or from using a product containing PFAS? What actions have these stakeholders undertaken to deal with this issue?

- BANGLADESH (NGO)**
 - PFAS are unregulated, however, currently existing laws could be used to regulate them.
 - PFAS monitoring, especially near industry locations, would help establish an initial inventory of hotspots.
 - The textile industry is potentially an important sector for PFAS use and releases.
 - The presence of high PFAS levels downstream of the Dhaka EPZ and the Adamjee EPZ indicates that PFAS substances are being used and released by Bangladesh suppliers making clothing for major US and EU brands.
 - This links major global consumer clothing brands to PFAS pollution in Bangladesh.
- FINLAND (NGO)**
 - Stakeholders involved in managing PFAS emissions must be National Chemical Safety Agencies, PFAS producers (exporter and importers); occupational health workers (e.g., firefighting officers), and product consumers.
 - Finnish Safety and Chemicals Agency, Finnish Environmental Institute and The Ministry of Social Affairs and Health with several other expert institutions look into the monitoring and exposure assessment part of this area.
 - Multinational brands must start a transition to substitutes of PFAS.
 - This will require innovation.
- GERMANY (NGO)**
 - The European Commission launched an online consultation on PFAS-ban with the proposal for coming from five member states.
 - After the open consultation, the positions of the industry and the environmental groups will be gathered.
 - There are discussions about exceptions for some substances like Chromtrioxid.
 - The goal is to ban PFOS.
- HONG KONG (Private sector)**
 - Academia and research organizations should also be involved.
 - Coastal research should be considered to try to see correlation between industry cluster and type of PFAS being detected in the waterways.
- IRAN (Academia)**
 - Two years ago, the problem of PFAS was put forward.
 - There have been many stakeholders involved globally, however, most being in the US.
 - In the US with the Congress back in DC, it would be time to demand action on PFAS pollution!
- JAMAICA (NGO)**
 - There is need for the regulation of chemicals in Jamaica.
 - Existing regulations speak to Pesticides and Pharmaceuticals, however, the issue of PFAS should be seen as one of importance at this time.
 - Stakeholders that should be a part of the discussion for the monitoring of PFAS are agencies

	under Health, Environment, Commerce, Academia and NGOs with relevant background knowledge and expertise.
SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - Opinions currently are that there is so much research on PFAS, and the conclusions and effects are clear enough that people should not be doing any more research! - Regulators need to focus on removing PFAS from products. - A complexity in South Africa and other low- and middle-income countries is researching children's PFAS exposures (dust in homes) in poor communities where the exposures may well be high. - The key trigger to get multinational brands to change are the consumers. - Risk communication efforts for consumers are therefore vital.
SOUTH AFRICA (Government)	<ul style="list-style-type: none"> - Government see PFAS separately from HHP's so awareness raising is needed around PFAS. - PFAS emissions are monitored by the Department of Environment, Forestry & Fisheries through the National environmental management: Waste act.
SWITZERLAND (IGO)	<ul style="list-style-type: none"> - UNEP report on textile value chain: - https://www.oneplanetnetwork.org/new-report-launched-sustainability-and-circularity-textile-value-chain - Further information on textile value chains: https://www.oneplanetnetwork.org/unep-textile-value-chain

Poll 3 Results (N=9)
Which stages of the textile product life cycle are relevant in your country, region, or sector? (participants could choose multiple options)

Product use:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8
Product disposal:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7
Chemical production:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
Product manufacturing:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3

Poll 4 Results (N=6)
In the textile product manufacturing stage, what manufacturing processes are relevant in your country, region, or sector? (participants could tick multiple options)

Assembly:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3
Dyeing, printing & finishing:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3
Fabric preparation:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
I don't know:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
Fiber production:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
Yarn preparation:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1

Q3. Which product functions that PFAS provide are essential in your country? List which safer alternatives are available in your country. What are the barriers to eliminating the use of PFAS in textile products?

CANADA (NGO)	<ul style="list-style-type: none"> - It is important to disclose information on PFAS in textile on product labels. - Consumers are not able to have a right to choice if no information is provided. - There is a new report by Health and Environment Justice Support that could be of interest: New Report: Sustainable Fashion? How companies provide sustainability information to consumers https://hej-support.org/new-report-sustainable-fashion-how-companies-provide-sustainability-information-to-consumers/ - Legislation is the key to disclose hazardous chemicals in products.
FINLAND (NGO)	<ul style="list-style-type: none"> - The essential use categories are still being discussed in Europe. - Understanding is that at least cosmetics, textiles, and the food packaging industry could and should eliminate PFAS use as there are available alternatives on the market. - Essential use would include medical use. - PFAS use in skis was in the news in Finland some months back and would also see a ban coming in. - For fire foams there are PFAS free foam alternatives available, but how quickly they will replace

	<ul style="list-style-type: none"> - PFAS foams, is still in question. - PFAS use in drugs and medical equipment is known, but there is little information on exposure via these routes.
GERMANY (NGO)	<ul style="list-style-type: none"> - Essential uses are for fire-foams and fire protective clothes. - There is an issue of alternative materials substituting PFAS (and PFOA) with toxicological properties that are not known yet. - There is a need for safe alternatives.
Hong Kong (NGO)	<ul style="list-style-type: none"> - Consider essential function to be linked to life and death - The question should be expanded – “ABC function is essential which is achieved by PFAS, while poisoning our water/fish/soil and ultimately harming humans. Is this acceptable?” - By adding the essential information (in this case, harm from PFAS), the perspectives will change.
IRAN (Academia)	<ul style="list-style-type: none"> - Thirteen companies explicitly stated that functionally equivalent alternatives to PFAS exist, and these companies already have such alternatives in use. - http://www3.cec.org/islandora/en/item/11777-furthering-understanding-migration-chemicals-from-consumer-products-en.pdf
JAMAICA (NGO)	<ul style="list-style-type: none"> - The cloth manufacturing industry is of interest to the economy. - https://www.joc.com/maritime-news/jamaica-promotes-caribbean-textiles_19880317.html - Health impact and the environment is not considered in the discussion about foam for firefighters. - import and export in terms of trade plays an important role as to what come in and leave countries.
NRDC (NGO)	<ul style="list-style-type: none"> - Function that is surprising is PFAS on swimwear to achieve increased speed. - Another use that has not been discussed much is the stain-resistant function for kids' uniform. - These functions do not seem essential. - The easiest item to be listed as critical exemption is medical gears. - China required people to dispose medical gears used in both hospitals and households as hazardous wastes. - Not all households may be following that.
SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - South Africa imports many products from all over the world, and it is difficult to know which products have PFAS in them. - Assumption that in South Africa many fabrics used on furniture are coated or treated to be stain resistant.
SOUTH AFRICA (Government)	<ul style="list-style-type: none"> - South Africa is banning the manufacture and use of PFAS but still import MANY products containing PFAS. - There are no regulations on this, such as listing which imported products contain PFAS and excluding them from import. - Better awareness around the possible dangers would go a long way.
SWEDEN (Government)	<ul style="list-style-type: none"> - The Swedish Chemicals Agency did a study in 2015 https://www.kemi.se/en/publications/reports/2015/report-7-15-occurrence-and-use-of-highly-fluorinated-substances-and-alternatives - The question of 'essential use' is not trivial, the EU commission discusses it in the action plan on PFAS with links to further information https://www.google.se/url?sa=t&source=web&rct=j&url=https://ec.europa.eu/environment/pdf/chemicals/2020/10/SWD_PFAS.pdf&ved=2ahUKEwiowuif2cPtAhVwxIsKHYk4AKAQFjAAegQIBBAC&usg=AOvVaw1eTwewEp944iTEk2klsaOv&cshid=1607613060229 - If large volume uses (e.g., in normal clothing) are banned the unit cost of PFAS will go up and the market availability in the longer term will go down which will be a driver for substitution in non- essential uses.

Poll 5 Results (N=6)

What function is PFAS providing in various textile products?

Some suggestions from participants included:

“Firefighting risk reduction”

“Water and heat-resistance”

“Grease resistant”

“Protection from water/liquids, oil, and fire in professional and sport gear”

“Potentially in color enhancing”

Poll 6 Results (N=6)

What products should be considered as critical exemptions?

Some suggestions from participants included:

“None – the risk outweighs the benefits”

“Lab equipment for emergency uses – while continuing to look for alternatives to phase out”

“Medical equipment”

“Firefighting and medical gear used for protection”

Helpful resources:

- **Perfluoroalkyl chemicals (PFAS):** <https://echa.europa.eu/hot-topics/perfluoroalkyl-chemicals-pfas>
- **Green Deal: Commission adopts new Chemicals Strategy towards a toxic-free environment:** https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1839
- **The Scientific Basis for Managing PFAS as a Class:** <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00255>
- **California Safer Consumer Product Program: Product – Chemical Profile for Carpets and Rugs Containing Perfluoroalkyl or Polyfluoroalkyl Substances:** https://dtsc.ca.gov/wp-content/uploads/sites/31/2020/02/Final_Product-Chemical_Profile_Carpets_Rugs_PFASs_a.pdf
- **Are fluoropolymers really of low concern for human and environmental health and separate from other PFAS?:** <https://pubs.acs.org/doi/10.1021/acs.est.0c03244>
- **The concept of essential use for determining when uses of PFASs can be phased out:** <https://pubs.rsc.org/en/content/articlelanding/2019/em/c9em00163h#!divAbstract>

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>

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.