Chemicals in Products (CiP)
Community of Practice (CoP)
2021
DIGEST COMPILATION

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ABOUT THE SAICM/UCT CHEMICALS IN PRODUCT COMMUNITY OF PRACTICE

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 (CiP). 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 CoP intention is to provide a platform for multiple stakeholders to engage with each other on CiP, as well as contribute to the Beyond 2020 discussions and deliberations**.

INTRODUCTION

Currently, the SAICM/UCT CiP CoP has an overall membership of **275 members** of which majority (n=93) represent the African region. With respect to the stakeholder representation, most members (n=87) are from the non-governmental (NGO). The gender representation is nearly like one another as females account for 161 of the overall membership and males 114. For a further breakdown of the membership statistic, see table 1 below.

Table 1.
SAICM/UCT Chemicals in Products CoP Membership Statistics 2021 (**N=**275)
Updated: 20 December 2021

		n	(%)
REGION	African	93	(34%)
	Western European and Others Group	88	(32%)
	Asia-Pacific	43	(16%)
	Latin America and Caribbean	41	(15%)
	Eastern European	10	(3%)
	N	275	(100%)
		n	(%)
STAKEHOLDER GROUP	NGO	87	(32%)
	Government	68	(25%)
	Private sector	50	(18%)
	Academia	32	(12%)
	Intergovernmental organisation	38	(13%)
	N	275	(100%)

		n	(%)
GENDER	Female	161	(59%)
	Male	114	(41%)
	N	275	(100%)

The Chemicals in Products (CiP) CoP successfully hosted four online discussions on topics specific to Chemicals in products this year and on topics such as: *Industry initiatives and information sharing on, chemicals in products in the supply chain, Chemicals of concern in building materials, Chemicals in Toys and Traceability in the textiles value chain*. Collectively, these discussions saw participation from 275 members from the following regions: Africa, Western European and Others Group, Asia-Pacific, Eastern Europe, Latin American and the Caribbean. The attending participants represented various stakeholder groups such as, academia, intergovernmental organisations, non-governmental organisations, governments, and private sectors within the CiP CoP.

The discussion that received the highest attendance (n=51) this year was on Chemicals of concern in building materials. Throughout the four discussions that took place this year, the key recommendations that were repeated and that can inform the SAICM beyond 2020 discussions include:

- Ensuring the quality and reliability of the data and information on chemical substances in products is essential to achieve the sound chemicals management across a products life cycle. Specific attention should be given to improve the quality of data in information systems provided by manufactures, specific to sectors such as the automotive and textiles sectors.
- Traceability should be applied in the sense of system thinking. As a result, the value chain can be sustained by developing systems that allow for full material declaration, legislation, and compliance for all producers in the supply chain including those in Low- and middle- income countries. Only thereafter a holistic sustainable chemicals management can be achieved.
- Voluntary standards can help provide information on material composition and chemical content to help increase awareness on this issue and give solution to the lack of regulatory requirements or standards in that sector.
- When considering the building sectors, it is important to distinguish between the formal and informal sector because they use different building materials in their processes that have an impact later the handling and disposal of the materials at end-of-life.
- There is a need for a global approach to chemicals in toys regulation, 80% of participating countries to the Convention of the Rights of the Child (CRC) and most participating Low- and middle-income countries (LMICs) do not have either chemicals legislation or specific legislation regulating chemicals in toys.
- Governments, scientific institutes, and NGOs play a vital role in supporting and conducting research on the harmful effects of the unsound management of chemical in toys manufacturing. They are also key for identifying alternatives and supporting further assessment to avoid regrettable substitutions. Accurate and detailed information on toy product packaging and labels is key for consumers to have access to information.

After the discussions, four summary digests were produced for information-sharing, for using as a resource to inform members work, and for professionals to share in their networks. This document is

a compilation of these discussion digests in English and French. The PowerPoint presentations for the discussions can be accessed here and more information on all the CoPs can be viewed here.

HOW TO JOIN THE CIP COP

In 2022 the CoP discussions will continue to 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.
The flyer for the SAICM/HHP CoP can be accessed here, https://www.saicmknowledge.org/sites/default/files/flyerCoP_CWC_CiP_rev.pdf. This flyer can be disseminated in your networks.

SAICM/UCT CIP COP 2021 DISCUSSION FORUM SCHEDULE

No	Date	Topic	Presenter	Facilitator
1	18th February	Industry initiatives and information sharing on chemicals in products in the supply chain	Timo Unger, Hyundai Kia Motor Group	Andrea Rother
2	15th April	Chemicals of concern in building materials	Amelie Ritscher, UNEP consultant. Oleg Ditkovskiy, ISC3 Stewart Muir, Bioregional	Andrea Rother
3	17th June	Chemicals in Toys	Olga Speranskaya, HEJSupport International Varuzhan Gyurjyan , Mankan LLC Gohar Khojayan, AWHHE Thony Dizon, EcoWaste Coalition Ram Charitra Sah, CEPHED	Andrea Rother
4	11th November	Traceability in the textiles value chain	Ahmad Ansari, ZDHC	Andrea Rother

COMMUNITY OF PRACTICE ON

CHEMICALS IN PRODUCTS

Organized by the SAICM Secretariat and the University of Cape Town

Issue: 1 of 2021
Discussion date: 18th February 2021

Discussion 1 digest

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

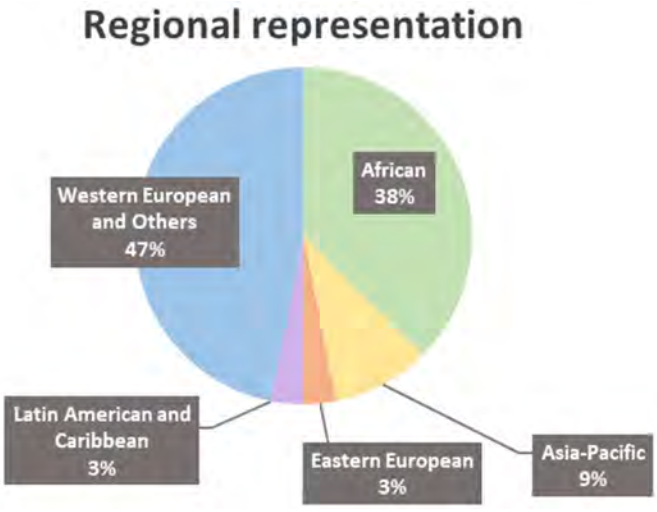
Knowing the chemical composition of products is a major challenge for the manufacturing industry, as well as their downstream supply chain. Case studies can assist various stakeholders in engaging with issues of information, transparency, and risk management. The Automotive Industry has faced this challenge 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 industries 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%



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

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 is 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?**
	  - 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?**
	  - 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?**
	  - 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)	- 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)	- 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)	- 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:	- **Question: how are cross-sector data exchange and harmonization interlinked?**
	  - 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

Issue: 2 of 2021
Discussion date: 15th April 2021

Discussion 2 digest

Topic of Discussion: Chemicals of concern in building materials

Building and construction is one of the largest end-markets for the chemical industry. Products used in this sector are diverse and include building materials, such as concrete, plastic, or wood, but also many other products, such as paints, adhesives, sealants, or construction elements made of composite materials. Many of these products are chemical-intensive and some contain chemicals that can have a harmful impact on human health and the environment along the products life cycle. Considering the importance of the sound management of chemicals and wastes for the 2030 Agenda and the expected growth of the building and construction sector following rapidly increasing urbanization, managing chemicals in building materials is key. Focusing on chemicals of concern in the building and construction sector provides significant opportunities to increase the sector's sustainability and circularity approach. This discussion engaged with questions from three dynamic presenters from UNEP, ISC3 and a social innovation organization.

ABOUT THE PRESENTER

Amélie Ritscher
An environmental chemist by training, Amélie is currently working as analyst on chemicals of concern in products for UNEP's Chemicals and Health Branch. She is supporting the work on a GEF funded project which aims at increasing the ambition of different stakeholders to track and control chemicals in the supply chains of the building, electronics, and toy sectors. Amélie has multiple years of experience in environmental policymaking and consulting.

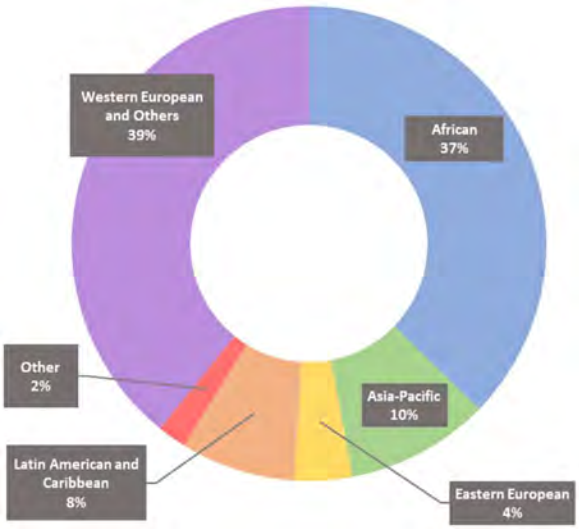
Oleg Ditkovskiy
Oleg Ditkovskiy is a project manager at the International Sustainable Chemistry Collaborative Centre (ISC3). He has a background in political sciences with the focus on chemical policy. He has years of working experience on projects at BASF, ECCC and GIZ on chemicals management, building materials, pesticides, and international conventions. His ongoing project at ISC3 is devoted to sustainable chemistry and renewable energies and PtX-technologies.

Stewart Muir
is a Project Manager for Bioregional, leading work related to improving the sustainability of consumer products, appliances and building materials. Recent projects include work with UNEP on their Eco-innovation supplement for building materials, and the home improvement retail chain Kingfisher. Prior to joining Bioregional, Stewart worked for 10 years at the Energy Saving Trust, including as part of the 'Efficiency for Access' Coalition, to support the market for super-efficient appliances to be used in off-grid settings in Africa and Asia, aiming to improve energy access under SDG7.

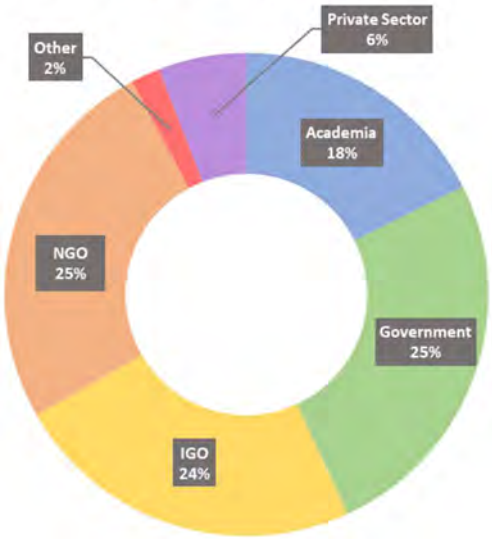
2021 DISCUSSION 2 ATTENDANCE BREAKDOWN

TOTAL ATTENDEES FOR 2021 DISCUSSION 2: 51
Female – 63%
Male – 35%
Unknown – 2%

Regional Representation



Stakeholder Representation



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

Chemicals in Products Community of Practice 2021 Discussion 2

4. While some information sources on chemicals of concern in building materials have been mentioned and the interest in sustainable design is growing in some countries, **the issue of chemicals of concern in building products often seem not to be considered** by actors in the building and construction sector. **Hindering factors** mentioned during the discussion include a **lack of awareness** on the issue by relevant actors from the sector and **lack of regulatory requirements or standards.** Where voluntary industry standards exist, they can help in providing information on material composition and chemical content but, certification schemes may not be widespread in use.

5. **Ensuring the transmission of information between installation and the end-of-life stages of a building product is very challenging.** Some companies are providing information in the form of labels on individual products, but these efforts appear to be rare and relatively early stages.

6. It is important to **distinguish between the formal and the informal building sector.** The informal building sector may use building materials that are often considered "non-traditional", including re-used or re-purposed products, such as plastic bottles or clay and plastic composite bricks. This can pose different and largely unaddressed challenges, including challenges related to handling and disposal of these non-traditional materials at end-of-life.

7. The **UNEP Eco Innovation Manual** offers guidance on developing and applying business strategies and models that incorporate sustainability throughout all business operations. A supplement specifically tailored to the building sector is currently being developed. In the area of building materials and construction products there are many opportunities for innovation to increase sustainability based on life cycle thinking and consideration of the entire value chain.

8. There is a lot of interest in **biobased materials** and some current innovations were shared during the discussion

ANNEX

DETAILED SUMMARY OF DISCUSSION:

Q1. In your country or region, are aspects on chemicals of concern or material composition considered during the design phase of buildings, e.g. by architects during planning and/or the design phase of building products? In your country or region, how can actors from the building and construction sector (designers, architects, construction companies, construction & demolition waste handlers) find information on chemicals of concern in building products? If chemicals of concern are not considered in the planning phase, what is hindering this process?

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

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

CAMEROON (NGO)	**French contribution:** - La question des produits chimiques dans la construction reste une préoccupation majeure et très peu connu par les concepteurs et réalisateurs de gros oeuvres. - Ceci dû à l'inexistence d'une loi fixant les mesures de sanction. - Aussi du manque de collaboration entre le ministère de l'environnement, le ministère des travaux publics et le ministère de l'urbanisme et aménagement du territoire. **English translation :** - The issue of chemicals in construction remains a major concern and very little is known by designers and builders of structural works. - This could be due to the non-existence of a law setting the sanction measures. - The lack of collaboration between the Ministry of the Environment, the Ministry of Public Works and the Ministry of Town Planning and Territorial Development is also a hinderance.
FINLAND (Government)	- Chemicals of concern in construction sector are regulated by EU REACH regulations and controlled by several authorities including municipal building control authority. - Recycling of construction materials seems challenging for the EU. - Buildings constructed before the ban on hazardous substances like PBDEs, HBCDD etc, could contain these chemicals and recycling of such materials to close the loop is still questionable. - Green Building Council Finland refines the know-how of sustainable development of the building and construction industry (https://figbc.fi/en/).
GAMBIA (Government)	- Chemicals of concern in construction materials are not really considered during design phases and a lack of awareness is greatly hindering the process. - Chemicals of concern are not regulated in the country.
GERMANY (NGO)	- A problem that currently exists is how to assess chemicals of concern in building materials that have necessary properties (like plasticisers, flame retardants) and are not acutely toxic. - What is more important? - In the EU, despite REACH, conventions and other regulations, the long-term consequences are often not really considered - like separation and recycling of materials. - Some issues connected to building materials are new and not well-studied (for example, the exact impacts of microplastic in food-chain, the cocktail-effects) - Green building credit systems like LEED, BREEAM, DGNB etc. are known in Europe, but not widespread. - In Germany there are hardly initiatives for private buildings, but there are regulations (direction sustainability of materials) for new public buildings.
MADAGASCAR (Government)	- There is no framework for the regulation concerning chemicals in construction. - There will be a draft put in place for a regulation on lead in paint using in the construction.
MOROCCO (Government)	- The absence of a framework law for the management of chemicals, in particular hazardous products, hinders the process of monitoring their uses, particularly in the planning phase. - It is effective to go through the process of developing standards that regulate the use of each product. - At the start, the application of each standard remains voluntary, but the Ministry of Health tries to convince the other departments to jointly draw up decrees to make their applications compulsory by producers and/or users – as was done to limit the use of lead-based paints. - As a source of information, Morocco has a standardization institute that provides users with all the information useful (standards) for the safe use of chemicals.

NEPAL (NGO)	- Chemicals of concern in building materials are not regulated. - Hindering factors are negligence as well as lack of awareness. - Government of Nepal has banned all forms of Asbestos and asbestos containing products since December 2014. - There are green building guidelines, but it does not include chemicals issues.
SOUTH AFRICA (Government)	- Chemicals of concern are not considered as most building materials are imported. - There is a move towards green economy and building with safer products, but this is not necessarily covered by legislation in SA yet. - An example is plastics and the unsafe disposal of used building materials as this is not considered hazardous waste. - Many poor communities collect old building materials to re-use which also poses health risks to their communities. - Hindering factors are a lack of awareness around proper disposal methods. - When old buildings are renovated in SA, there may be asbestos being removed without the proper safety protocols or removal and proper disposal as hazardous materials putting the environment and human heath at risk. - Asbestos was banned in SA but the monitoring of old buildings and their renovation is not considered.
SWEDEN (Government)	- There is a strong interest to design in a sustainable way, both climate and chemical aspects. - Apart from Basta system, there is another similar system, Sundahus in Sweden. - The EU Reach regulation includes obligations to inform on chemical content. - Information on material to recycle can be difficult due to very long lifetime. - Some flooring companies put a label on installed flooring in Sweden to facilitate recycling. - The costs to handle already installed asbestos and PCB in sealants should serve as strong motivators to a preventive approach! - Especially by those who will own the building and who will have that cost.
SWITZERLAND (IGO)	- Information on chemicals today, will have evolved in 30-40 years. - A challenge is how to find relevant information on chemicals in materials in buildings 30-40 years later.
UNITED KINGDOM (NGO)	- Through experience from working with architects it seems that a base understanding of chemicals is not part of architect training and education. - There can often be a lack of ownership of the issue of chemicals between the builder and the architect when designing the project. - The culture in the construction sector is also hindering the process, as there is not enough connectivity and holistic approach to projects. - Public sector building projects can have more control over what is specified.
ZAMBIA (NGO)	- Although regulations are there in some instances, especially from the Zambia Environmental Management Agency, it is quite a challenge to monitor and enforce standards that is coupled with low knowledge by the contractors and local builders and the communities on the chemicals in products. - Building certification is done and given by the Local Authority and while the chemical administration and major enforcement is done by ZEMA. - We have no voluntary standards.
PRESENTER'S COMMENTS:	**Question: What is the best way for a consumer to find out what chemicals are in construction materials if they are involved in building for domestic use?** - Labels or certifications can be used to find information on chemical contents. - For some products, (e.g. some paint strippers), some countries require manufacturers to provide information in the form of safety data sheets.

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):
In your country, how are chemicals of concern addressed by the building and construction sector currently?

- "Here in Colombia we have some regulations related to chemicals concentrations that include some CoC (not all), for example, asbestos is forbidden."
- "Asbestos"
- "Voluntary systems within industry and pressure from those commissioning the building."
- "In Europe there are REACH, ROHs that cover some of them."
- "In Sierra Leone the building and construction sector does not pay any attention to this most specially being a new phenomenon."
- "REACH ensures the finished product does not contain restricted substances, but best practice lacks drivers in the UK. It will be interesting to see how this changes post-Brext as well."
- "Not made clear to the ordinary consumer."
- "Majority of large companies are using Basta to work with phase out of chemicals of concern."
- "In Finland, chemicals of concern in construction sector are regulated by EU REACH regulations, controlled by several authorities including municipal building control authority."
- "They are mostly not aware of the chemicals of concern as this training is not given to architects and engineers."
- "In general, chemicals of concern are not really considered in The Gambia as there is no regulatory infrastructure regulating chemicals in construction materials apart from the banning of Asbestos as roofing materials. Awareness if also lacking."
- "Through firstly identifying the type of chemicals, then through some regulatory decisions."
- "Armenia: regulations of Eurasian Economic Commission on the safety of buildings and structures, building materials and products."

Poll 2 Results (N=11)
Are there currently any voluntary initiatives coming from the construction sector in your country (e.g. building certifications).

- "Not aware."; "No."; "Not sure."
- "LEED, SELLO CASA COLOMBIA, EDGE."
- "Building rating tools like BREAAM are fairly widespread in the UK, and Bioregional's One Planet Living framework has been embedded by progressive builders. For example, Greenscore/Sassy property's Springfield meadows development."
- "There is a move toward Green building initiatives to link to the green economy."
- "It is a long time that there is a building certificate in Iran and without it is impossible to start a building."
- In the EU: initiatives like passive houses promoting e.g. insulation materials and saving energy and emissions."
- "In Sierra Leone building permits are issued to allow the construction. This does not cover anything on chemicals of concern."
- "Yes, eco label Svanen in Sweden for houses and products."
- "Yes, here in Colombia we have national and international certifications "Lead", "Edge" and "Casa Colombia"."

Q2. What are effective ways to ensure there are no CoC in building plastics material? What kind of building materials are commonly used in your country and how are they controlled? Does plastic waste play any role in your country or region?	
COLOMBIA (Academia)	- In Colombia there is a wide variety of materials, from aluminium, wood, concrete, bricks, even recycled materials.
FINLAND (Government)	- Concrete, wood, brick, insulation material are used for building construction. - EPS from insulation material contains additives like HBCDD. - After the ban on HBCDD other substitutes are now being used in insulation materials.
IRAN (Academia)	- Buildings are made by cement or iron or wood. - In recent years there has been good progress for fortification of cement with different materials to make it stronger.
NEPAL (NGO)	- In rural areas mostly local, renewable materials were used. - In urban areas many modern materials including plastics, prefabricated materials, etc are used. - Not much attention paid to CoC in both rural and urban setting. - Before banning of Asbestos, some corrugated asbestos sheets were used. - Similar sheets have been getting imported and has been called asbestos free but there is no checking and monitoring being done by concerned authorities.
SIERRA LEONE (Government)	- Various materials like bamboo, sticks, aluminium, metals, grass, tapollen, etc… are being used.
SOUTH AFRICA (Academia)	- There is an initiative to make "eco-bricks" out of plastic 2 litre bottles stuffed tightly with plastic bags!
SOUTH AFRICA (Government)	- There is a formal building sector as well as the informal building sector. - The informal building sector uses anything they can build with, timber, old building materials, invasive alien trees, old glass bottles, plastic, animal waste (cow patties), old plastic bottles filled with anything and then cemented together. - Clay and plastic composite bricks are made are also made by taking shredded invasive plants, mixed with recycled plastic to make composite bricks.
SWEDEN (Government)	- In Sweden plastic is recycled more and more, both in packaging, and also EPS from building. - Wood is used extensively, both traditionally and in new laminated products for large buildings. - The cost (financial and environmental) of transporting waste to recycling plant can be an issue.
UNITED KINGDOM (NGO)	- The UK has a large amount of concrete block and brick construction. - The concrete industry has made a low carbon roadmap, but there is not a large amount of drivers to move towards a lower carbon CEM grade, or something more innovative like limecrete or hempcrete.
ZAMBIA (NGO)	- Local materials like timber and plastics are used but may contain chemicals of concern. - There is a drive to ban single use plastics, as a result.
ZIMBABWE (Government)	- Plastics have a lot of roles in Zimbabwe's market and industry. - This includes packaging of most products (agricultural like fertilizers,) retail paper bags, plastic pipes, etc… - However, these plastics have a negative role that they play including polluting the environment after their initial use, pollution of water bodies like dams, lakes, and rivers, and polluting the air with increased carbon gases through burning of plastics.
PRESENTER'S COMMENTS:	- In the EU, plastics are used more and more together with minerals because it is cheap and has great functionalities, but there has been hardly any plan for the end-of-lifecycle. - There are many projects using plastic waste for composites with minerals or wood, but since the most of waste is contaminated with CoC or even worse people do not know what is inside - it is big problem for indoor air issues and also it is not possible to recycle the new products made of this waste.

Poll 3 Results (N=8)
What are Chemicals of Concern in plastics that need to be substituted in your country?

- "EU: the most flame retardants (due to the smoke toxicity in case of fire)."
- "BPA (Plastics and Endocrine Disrupting Chemicals), phthalate, brominated flame retardants."
- "Lead, formaldehyde, BFRs, HBCD, phthalates, per-fluorinated compounds, phenol."
- "Pthalates, PVC containing phthalates is widespread. Alternatives like linoleum or cork are not as common."
- "In Sierra Leone chemicals of concern in plastics that need to be substituted are dioxins and furans."
- "Unfortunately, PVCs are still present in plastic products in Latin America."
- "In South Africa we have no way of knowing what chemicals are in our plastics which may be CMRs."

Poll 4 Results (N=8)
Is plastic waste regulated in any way in your country?

Yes: 63% (5)
No: 12% (1)
I don't know: 25% (2)

Poll 5 Results (N=4)
Are you aware of safe alternatives to chemicals of concern in plastics for construction?

Yes: 50% (2)
No: 50% (2)

Q3. Please share innovations in buildings material or in business models in the buildings sector, that is helping phasing out CoC (and supports circularity), from your countries and institutions. Have there been any related challenge in their implementation?

CANADA (NGO)	-	A non-combustible asbestos-free material capable of withstanding heat up to +1100°C has recently been invented in Russia.
COLOMBIA (Academia)	-	One example is the implementation of recycled materials in constructions processes.
GERMANY (NGO)	-	Innovations like insulation materials made from residual biomass or secondary raw materials like jute or hemp mats (as alternative to synthetic materials). - The challenge here is renewable sources are competing with food security and agriculture. - Polymeric-flame retardants have been used after the ban of HBCD in the EU.
NEPAL (NGO)	-	A new kind of building material, like prefabricated one, which is much lighter but stronger is increasingly available. - No one is concerned about their CoC. - This is the very much the challenge now.
UNITED STATES (Government)	-	While sustainability and circularity terms are more and more spoken about, used, and abused, it matters to know that there is/are community of experts trying to focus, present projects, and, provide guidance and systemic reference systems for actors in the field, toward greater support and commitments.
ZIMBABWE (Government)	-	Adopting of measure that will minimise chemicals effects in work structures.
PRESENTER'S COMMENTS:	-	**Question: is there a process of costing the innovations, particularly for resource poor countries and communities?** - Biobased materials is one area that is seeing more attention (paints/plastics) but it seems to still be early days. - Innovation in ceramic tiles has been seen from connecting up with waste glass, requiring less virgin clay extraction.

Poll 6 Results (N=8)

Please provide any examples you know of where chemicals of concern have been successfully addressed through substitution or innovation.

- "Insulation materials made from residual biomass or secondary raw materials (jute, hemp mats) or self-healing materials (polymer-based)."
- "The main example in Colombia is asbestos. Regarding this material is forbidden the construction sector needed to innovate in its substitution. Also old construction that have this material needs to be managed with care, such as norms establish."
- "It is hard to get access to this information."
- "Move to Chromium II from Chromium VI. Example of Savroc Triplehard as a new plating technique."

Helpful resources:

- **Global Chemicals Outlook Tool II**
  https://www.unep.org/resources/report/global-chemicals-outlook-ii-legacies-innovative-solutions

- **Basta Online (provides tools to help choose non-hazardous materials)**
  https://www.bastaonline.se/?lang=en

- **ChemSec SIN (Substitute It Now!) List**
  https://sinlist.chemsec.org/what-is-the-sin-list/

- **Report on Sustainable Building and Living, Focus on Plastics – ISC3 report**
  https://www.isc3.org/en/activities/collaboration/foresight-workstreams.html

- **Draft updated technical guidelines on the identification and environmentally sound management of plastic wastes and for their disposal**
  http://www.basel.int/TheConvention/OpenendedWorkingGroup(OEWG)/Meetings/OEWG12/Overview/tabid/8264/ctl/Download/mid/23551/Default.aspx?id=20&ObjID=23541

- **Bioregional Eco-Innovation manual**
  http://unep.ecoinnovation.org/

- **Bioregional Eco-Innovation manual: Supplement on building materials draft**
  https://saicmknowledge.org/sites/default/files/meterial/Eco-i%20Building%20Materials%20V2%20APR%202021.pdf
    - This is the current draft of the manual. If you would like to provide comments on this draft, please send an email to the following address: stewart.muir@bioregional.com

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CiP CoP: The Secretariat of the Strategic Approach to International Chemicals Management (SAICM) and the Environmental Health Division at the University of Cape Town (UCT) created this Community of Practice (CoP) to foster online discussions and address key issues on Chemicals in Products (CiP) among stakeholders from governments, international organizations, industry, academia and civil society.

This CoP is contributing to the SAICM/GEF project on Emerging Chemicals Policy Issues Knowledge Management Component. This activity is supported by the Global Environment Facility (GEF) project ID: 9771 on *Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM).*

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

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

COMMUNITY OF PRACTICE ON
CHEMICALS IN PRODUCTS
Organized by the SAICM Secretariat and the University of Cape Town

Issue: 3 of 2021
Discussion date: 17th June 2021

Discussion 3 digest

Topic of Discussion: Chemicals in Toys

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

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

To view the PowerPoint presentation from this discussion, click here.

ABOUT THE PRESENTER

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

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

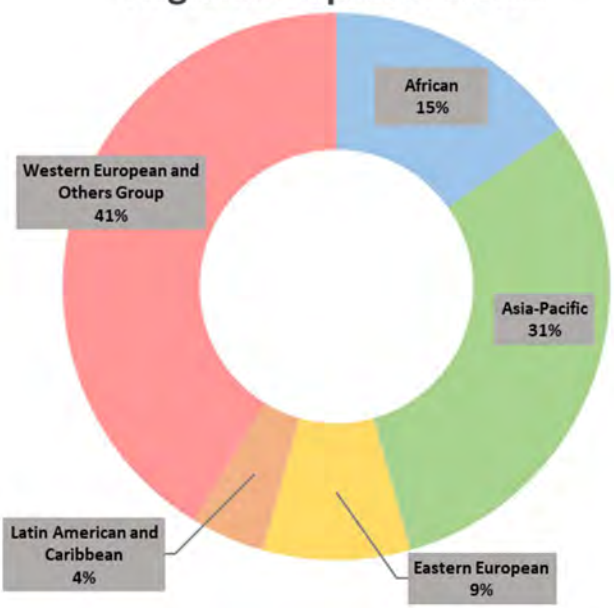
Gohar Khojayan is a Communications Specialist at Armenian Women for Health and Healthy Environment (AWHHE) NGO based in Yerevan, Armenia. Since 1999 AWHHE has successfully implemented more than 140 projects. AWHHE is national SAICM NGO focal point and a member of the International Pollutants Elimination Network (IPEN). Ms. Gohar Khojayan is responsible for public education, advocacy and stakeholder involvement. She represents AWHHE in the SAICM related processes. office@awhhe.am; http://www.awhhe.am

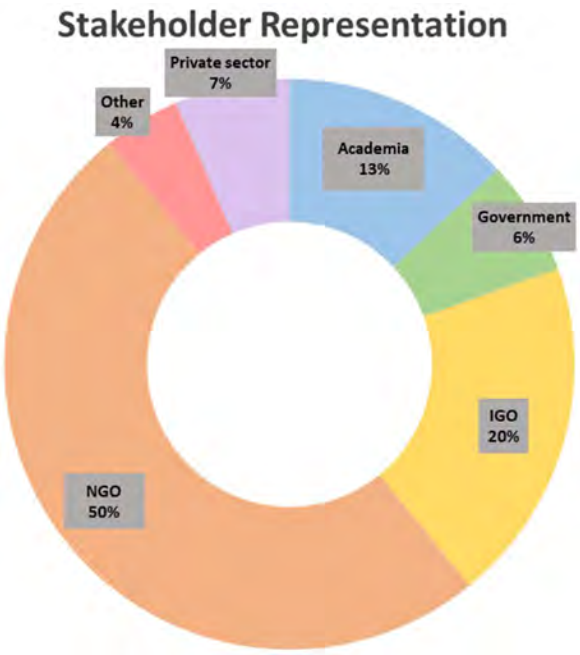
Thony Dizon has been working for the EcoWaste Coalition for more than 10 years. He handles the Chemical Safety campaign of the organization through the Project Toxic-Free for Human Rights and Sustainable Development in the Philippines (Project Toxic-Free Philippines). info@ecowastecoalition.org; http://ecowastecoalition.blogspot.com

Ram Charitra Sah, has a B.Sc. in Forestry and M.Sc. Environmental Science. He is Executive Director at the Center for Public Health and Environmental Development (CEPHED) dedicated to the protection of public health and environment through research, awareness and capacity building, and policy dialogue. CEPHED is IPEN participating organization and is in the advocacy work on toxic chemicals, health, and environment. Mr. Charita Sah has pioneered the issue of Chemical Safety and Toxic Chemicals in Nepal through carrying out research in this area. info@cephed.org.np; www.cephed.org.np

2021 DISCUSSION 3 ATTENDANCE BREAKDOWN

TOTAL DISCUSSION 3 ATTENDEES: 46
Female – 57%
Male – 41%
Unknown –2 %





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

Chemicals in Products Community of Practice 2021 Discussion 3

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

1. Regulating chemicals in toys

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

2. Monitoring of chemicals in toys

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

3. Consumer access to information

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

ANNEX

DETAILED SUMMARY OF DISCUSSION 3:

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

Question1. Does your country have regulations on chemicals of concern in toys, are these functioning and enforced and which chemicals in toys are regulated?

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

ARMENIA (Private sector)	-	**Mankan, a toy manufacturer in Armenia, is currently making soft toys.**
	-	**The materials used are organic and therefore have no toxic elements.**
BANGLADESH (NGO)	-	Unfortunately, there are no regulations over chemicals used in toys.
	-	Environment and Social Development Organization (ESDO) has prepared a Study Report On 'Toxic Toys: Heavy Metal Content & Public Perception in Bangladesh' in 2013.
	-	In the continuation of monitoring the toxic toys, ESDO has extensively researched BPA (Bisphenol A).
	-	BPA is used to make toys, food storage containers, sports equipment, plastic bottles including water bottles, electronic equipment, dental sealants, CDs, and DVDs.
	-	It heavily affects the nervous, cardiovascular, endocrine system as well as causes obesity, diabetes, and cancer in severe cases.
	-	ESDO had examined 12 toy samples along with surveying the consumers and retailers of toys.
	-	A Laboratory at the University of Minnesota Duluth, USA conducted the tests.
	-	Average content of BPA was found to be 0.87 (µg/L) in the samples.
	-	This is 22 times higher than the EU standard permissible limit.
	-	It was also evident that the yellow colour has consistently higher level of BPA in our sample result, while the lowest was in green and white coloured samples.
	-	According to Survey of ESDO, toys are the highest purchased products and a large portion (95%) of the surveyed population is unaware of the health effects of BPA.
	-	ESDO is working on expanding this report to lead containing paints that are used in toys.

	- **Report Link:** https://ipen.org/sites/default/files/documents/ESDO%20Study%20Report%20on%20Toxic%20Toys%20in%20Bangladesh.pdf
CAMEROON (NGO)	**French contribution:** - Il n'y a pas de loi spéciale au Cameroun sur les produits chimiques et les jouets pour enfants. - Le Cameroun est membre de la SAICM et reste soumis à ses exigences. - De plus, le pays a signé et ratifié des conventions internationales sur les produits chimiques telles que Stockholm, Bâle, etc… - Des efforts restent à faire au niveau national en ce qui concerne les produits chimiques et les jouets. **English translation:** - There is no special law in Cameroon on chemicals and children's toys. - Cameroon is a member of SAICM and remains subject to its requirements. - In addition, the country has signed and ratified international conventions on chemicals such as Stockholm, Basel, etc… - Efforts remain to be made at the national level about chemicals and toys.
GERMANY (NGO)	- Recent EU concerns are going towards online selling of toys. - In the EU, the Safe Toys Directive regulates chemicals, however, there are several loopholes. - CMRs are only banned on the surface of toys but many sanitizers, allergens, neurotoxins, and EDCs are not regulated. - There are local and regional regulation, but in the age of eBay and Amazon and international purchases it does not always work.
HONG KONG (Private sector)	- One approach could be a precautionary approach, like Swiss printing ink ordinance. - Another approach could be to have a positive list. - Should anyone want to use new chemical, they should share toxicological data.
IRAN (Academia)	- There are lots of news and alerts in local newspapers about the danger of chemicals in toys. - Not aware of government regulations about chemicals in toys.
NEPAL (NGO)	- Toys Standard Enacted on 16th Jan 2017, became effective on 18th June 2017, and suspended on 17th Nov 2017 due to Corporate Sector pressure. - Standard had included 12 chemicals: Lead, Mercury, Cadmium, Chromium, Arsenic, Zinc, Selenium, Antimony, Barium, Bromine, BPA, and Phthalates - A new weaker standard was suggested in 2018 and does not have the BPA, Phthalate, Zinc, or Bromine. - This has not yet been Gazetted. - A standard will help consumers to get safer products, help government to regulate the import and export and consumer protection, help industry to boost their export, income, and image. - New chemicals are getting into the toy supply chain, so more evidence needs to be generated globally to keep track of toxicity of these new chemicals. - Safer alternatives are available. - Development of science and technology would be beneficial. - Government of Nepal carried out monitoring of toy during the process of enacting mandatory standards, but the report has never been made available to the public.
PHILIPPINES (NGO)	- In the Philippines there are specific chemicals in toys being regulated but not all. - Implementation and enforcement are still concerning.
SOUTH AFRICA (Academia)	- No chemicals management policy nor a regulation for toys. - This is problematic as manufactures do not need to disclose information on what chemicals are in their products.
SRI LANKA (NGO)	- There is no law on these chemicals. - Unfortunately, there are no facilities to check toys. - Developing a regulation will benefit Sri Lanka, especially when thinking about lower and middle-income families who cannot afford costly toys that are supposed to be safe. - If testing is conducted and demands for regulated limits established or a third-party certification established, this would help create a safe toys market.
SURINAME (Government)	- No regulation on chemicals in toys yet.
UNITED STATES OF AMERICA (Private sector)	- There are effective chemical restrictions. - These are effectively enforced at ports of entry and by retail surveillance/recall. - Heavy elements, phthalates, nitrosamines are specifically limited, and all CMRs, eye and skin irritants, acutely or chronically toxic materials are also prohibited.

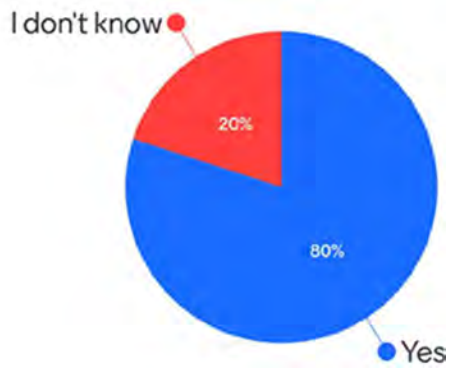
PRESENTER'S COMMENTS (HEJSupport International)

- Only a limited number of chemicals are regulated in toys.
- The lists of regulated chemicals in toys vary.
- There is little overlap between existing policies which results in different levels of protection for children living in different countries and regions.
- There is no international legislation on which chemicals should be banned or restricted in toys in the first place. Therefore, toy manufacturers must comply with the requirements from different jurisdictions in order to be able to export their products.

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

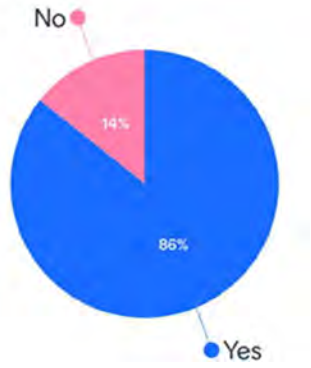
Poll 1 Results (N=5):

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



Poll 2 Results (N=7)

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



Poll 3 Results (N=22)

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

Yes -100%
No – 0%

Poll 4 Results (N=18)

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

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

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

Import and export impacts (n = 2):

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

Information generation and sharing (n = 4):

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

Poll 5 Results (N=5)

Why should chemical regulations in toys be continuously reviewed?

New information (n = 2):

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

Development of new chemicals (n = 3):

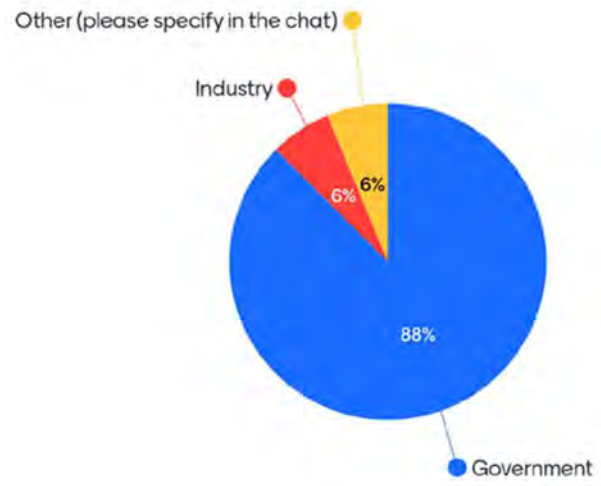
- "Because new chemicals are getting into the toy supply chain, more toxic substances are being generated globally, safer alternatives are available, development of science and technology."
- "Industry is developing new substances; protection of children's health should be a continuous effort."
- "To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

Question 2. If your country conducts monitoring of chemicals in toys, is this information available to the public? If your country does not conduct monitoring of chemicals in toys, what is needed for this to occur?	
ARMENIA (NGO)	- **The consumers should be given more of a voice.** - **Labelling is a demand driven issue - mothers, or caretakers of children must be informed and have to get tools to influence monitoring.** - **In Armenia parents (mothers) groups in kindergartens are quite a force!**
CAMEROON (NGO)	**French contribution:** - En 2020, avec le soutien de l'IPEN, des échantillons de jouets pour enfants sur le marché ont été collectés et analysés. - Les résultats sont destinés à être rendus publics afin d'intensifier les actions de veille et de plaidoyer pour un cadre juridique et réglementaire au niveau national. **English contribution:** - In 2020, with the support of IPEN, samples of children's toys on the market were collected and analysed. - The results are intended to be published to the public to intensify monitoring and advocacy actions for a legal and regulatory framework at the national level.
GERMANY (NGO)	- Rappex list is used in the EU. - The EU offers public access for its directives and papers, but there is no system on products signalling high rates of specific chemicals. - On the other side, toys that have SHC are not allowed to get to the market. - There is a huge gap, however, in terms of monitoring toys sold online in Germany and the EU.
HONG KONG (Private sector)	- Eco-friendly Toys are a possible solution. - **Please complete the survey below regarding Eco-friendly toys:** **https://rebrand.ly/ECO-Friendly-Toys-Survey** - It will be useful to see once EU opens up SCIP information for consumers, linked to EU's Product transparency plan.
IRAN (Academia)	- Media, TV, newspaper, etc… are useful in sharing information. - There is information about different bisphenol, formaldehyde, polyphenol, etc… in toys and how to avoid them in Iranian news. - Source: https://irchem.ir - It is the responsibility for government, NGOs, academic system, etc… to make the people aware. - Global regulatory agencies have the responsibility to make sure that all these laws and regulations in developing countries are in place, are in good standing and updated and are ENFORCED!
NEPAL (NGO)	- As there is no Child Regulation, no monitoring is ongoing. - First every country which has adopted SAICM CIP emerging policy, and are party to CRC, should enact toys regulation with the mandatory provision of regular market and industry monitoring and make the results public. - Monitoring without making result public does not make sense to public who need to be protected. - Having monitoring policy, plan, testing infrastructure (good quality lab, training, and human resources) and enough allocation of national annual budget is essential for conducting monitoring on chemicals in toys. - Engagement of a wider stakeholder audience, especially child health, child rights and child welfare-based NGOs and paediatric societies. - The major role of monitoring of toys should be carried out by the Government. - However, NGOs have been, and continue to, play a vital role in many countries in monitoring the chemicals in children's toys. - Academia can do the monitoring as well. - There should be mandatory provision in each toy manufacturing company and industry to test each batch of the toys before it leaves the industry premises to the market. - Industries must maintain the standards on their own. - There is also no monitoring of online products including toys sold in Nepal.
PHILIPPINES (NGO)	- The regulation of monitoring of toys being sold online is still a problem. - During the Pandemic, the selling of products including toys through online shopping platforms has boomed, thus a problem of safety monitoring and regulation becomes a major concern.
QATAR (Government)	- There is no monitoring in Qatar. - Currently working on legislation, which will take some time due to different entities involved.
SOUTH AFRICA	- South Africa does not conduct any monitoring.

(Academia)	-	There would need to be legislation for this to happen. - If it were required in legislation, researchers and other institutions could assist the government with data needed for monitoring but ultimately the government needs to have oversight.
SRI LANKA (NGO)	-	First need to establish necessary rules and regulations for chemically safe toys.
UNITED STATES OF AMERICA (Government)	-	There is limited governmental resourcing in the maintaining and consistent evolution of regulatory programs. - National agencies of competency could collaborate with stakeholders, (academia, included) and assist in the education, information, and behavioural changes, including studying and assessing local, and/or national matters of interest. - Engaging and committing to a project of relevance is often a valuable experience and helps work toward enhanced awareness and commitment, as appropriate.
UNITED STATES OF AMERICA (Private sector)	-	US CPSC requires mandatory certification of all toys and checks at ports of entry, online, and at retail level. - Industry must be first line of monitoring chemicals, but government must be active in this area to deter rogue operators. - Fundamental error in all the issues discussed is that they focus on chemical content, not potential exposure, or actual risk. - Nepal standard as proposed by CEPHED was unworkable and government subsequently agreed to align with international toy safety standards.
ZAMBIA (NGO)	-	To put in place legally binding control by enacting the law to phase out lead paint and lead in toys would be the best possible solution.
PRESENTER'S COMMENTS (HEJSupport International):	-	Monitoring of chemicals in toys could trigger the development of regulations in countries where there are no legislations regulating chemicals in toys. - **This is the link to the UNEP Review of chemicals-related Toy Safety Policies and Regulations in selected Low- and Middle-Income Countries: https://saicmknowledge.org/sites/default/files/publications/UNEP_Review_Toy_Safety_policies_LMIC_final.pdf** - Many countries still do not have regulations on toys. - This is not an excuse for not monitoring chemicals in toys. - As was noted in today's presentations, monitoring of chemicals in toys can be a starting point for the stakeholders to initiate the development of the legislation. - Toys sold on-line are of special concern as they are usually much less regulated. - The idea of a global publicly available database of chemicals of concern in toys (using the EU SCIP database as an example) will be helpful for consumers, manufacturers, and recyclers. - Starting July 2021 all toys sold on-line in the Eurasian Economic Union will have to comply with the EEU technical regulation on Toy Safety. This was largely the result of public pressure and consumer demands for toy safety.

Poll 6 Results (N=16)

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



Poll 7 Results (N=18)

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

No – 12 (67%)
Yes – 5 (28%)
I don't know – 1 (5)

Countries that said "yes":	Countries that said "no":	Countries that said "I don't know":
Iran	Nepal	Germany
The European Union	Philippines	
United States of America	Sri Lanka	
	South Africa	

Poll 8 Results (N=14)

How are toys sold online monitored in your country?

No monitoring – 11 (79%)
Monitoring done – 3 (21%)

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

ARMENIA (NGO)	- **Recycling hazardous waste into new products is a huge concern.** - **If developed, the global database should be maintained in at least all UN languages.** - **This discussion has identified a number of issues that already now could be picked up for follow-up/ global action.**
CAMEROON (NGO)	**French contribution:** - Connaître les substances chimiques contenues dans les produits et jouets limitera les risques chimiques, protégera la santé des enfants et l'environnement. - Le respect de l'étiquetage doit être exigé avec description des composants du produit dans la langue nationale du lieu de commercialisation. **English contribution:** - Knowing the chemicals contained in products and toys will limit chemical risks, protect children's health and the environment. - Compliance with the labelling must be required with description on the components of the product in the national language of the place of marketing.
GERMANY (NGO)	- There is a huge gap of information on hazardous substances (HS) in toys from public side in Germany. - It is up to us, CSO, to inform the public. - WECF, for more than ten years, has been running a programme called www.nesting.org, informing on HS in products and how to avoid risks, including calling for regulations. - Our brochure on toys is available in 10 languages; you can find it here: https://nestbau.info/broschueren/ - A database would help to avoid HS come back in products from recycled materials.
HONG KONG (Private sector)	- I feel everything we speak about can be applied for all kind of consumer products, especially sensitive products like toys, cosmetics, textiles, food packaging etc… - Since they go on our skin, and we consume them. - Yes, database would be good for transparency (while protecting confidential information) and will help with enforcement and surveillance.
IRAN (Academia)	- In Iran there are already plenty of information available about chemicals in toys in TV, newspapers, etc… - As usual academic papers are coming out, but it seems that the government is behind the schedule to catch, follow, and enforce. - This may be due to the recent global problems and sanctions.
NEPAL (NGO)	- Once chemicals of concern in toys is known, consumers can make informed choices and informed purchasing. - Government can easily and effectively regulate the toxic toys. - Toys producing companies can enhance their images and reputation as well as boost their export and income. - Information regarding all chemicals of concern need to be properly labelled as per the international standard practice. - Proper allocation of labelling space, understandable language, clearly visible font size and colour is also needed. - Label should also be accompanied by the warning signs as it is very much essential. - First information on chemicals that are harmful to health should be given to public. Alarming information should be printed with red colour. - There should be intention of making recycled products equally safer as original products. - Labelling of chemicals in toys benefits waste management. - Since practices and approaches of managing chemical containing waste and general waste is completely different. - It will also help to reduce environment burden of toxic chemicals as well as eliminate the sources of occupational exposure of waste handing workforce. - Safer recycled products will reach the consumer's hands. - People should be taught where and how to dispose chemicals and chemical waste or toys appropriately. - Mindsets of political leaders should be changed too.
PHILIPPINES	- Labelling information is important as this will give consumer the right-to-know.

(NGO)		
QATAR (Government)	-	To help assess health risks and waste treatment management.
SOUTH AFRICA (Academia)	-	Having chemicals on the labels is important but that is just one step.
	-	Consumers then need information about the chemicals and risks to their children, as well as access to alternative non-toxic toys.
UNITED STATES OF AMERICA (Private sector)	-	Full ingredient disclosure is unnecessary and not wanted by most consumers.
	-	This information would be confusing and needlessly alarming.
	-	Only information necessary for safe handling and use should be disclosed.
	-	Better toy safety will not be achieved by additional requirements or ingredient disclosure, but by much better enforcement of existing norms.
UNITED STATES OF AMERICA (Government)	-	Consumer right protection.
PRESENTER'S COMMENTS (HEJSupport International):	-	Toxic chemicals do not have a place in toys.
	-	There are up to 350,000 chemicals on the global market. Most of them have not been tested for their hazardous properties.
	-	Only limited number of chemicals is regulated in toys.
	-	There are significant differences between the safety requirements for chemical substances in toys between countries and regions.
	-	Chemical-by-chemical approach is applied in most existing regulations.
	-	Consumers, retailers, and recyclers are largely unaware about chemical content of toys.
	-	Good initiatives are on the way. However, given the international nature of the toy sector, including the supply chain stricter international requirements are needed to ensure that toys are equally safe for every child around the world.
	-	Disclosing toxic content of toys will help consumers and retailers to advocate for a strict regulations and enforcement.

Poll 9 Results (N=10)

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

Information on chemicals of concern (n = 4):

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

Information for safety reasons (n = 3):

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

General information on chemicals (n = 3):

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

Poll 10 Results (N=11)

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

Knowledge and information (n = 4):

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

Protection of the environment (n = 2):

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

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

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

Poll 11 Results (N=16)

Would a global database developed under the SCIP approach be important to achieve greater transparency about chemicals of concern in toys?
Yes - (100%)
No – (0%)

Useful resources:

- **Global Chemicals Outlook Tool I**
  https://www.unep.org/resources/report/global-chemicals-outlook-ii-legacies-innovative-solutions
- **WHO (2016): Preventing disease through healthy environments** https://www.who.int/quantifying_ehimpacts/publications/preventing-disease/en/
- **UN General Assembly A/HRC/33/41 (2016): Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and waste** https://undocs.org/A/HRC/33/41
- **UNEP Review of chemicals-related Toy Safety Policies and Regulations in selected Low- and Middle-Income Countries**
  https://saicmknowledge.org/sites/default/files/publications/UNEP_Review_Toy_Safety_policies_LMIC_final.pdf
- **European Toy Safety Directive - Substances Restricted in Toys**
  https://echa.europa.eu/substances-restricted-toys?p_p_id=eucleflegislationlist_WAR_euclefportlet&p_p_lifecycle=0&p_p_col_id=column-1&p_p_col_count=1
- **Chemicals of concern in plastic toys – ScienceDirect**
  https://www.sciencedirect.com/science/article/pii/S0160412020321498?via%3Dihub
- **UNEP study: Harmful Chemicals Found in 25% of Children's Toys**
  http://sdg.iisd.org/news/harmful-chemicals-found-in-25-of-childrens-toys-unep-study-finds/
- **IPEN initiatives on Chemicals in Children's Toys**
  https://ipen.org/tags/chemicals-childrens-toys
- **IPEN: Toxics in products**
  https://ipen.org/site/toxics-products-overview
- **IPEN: Raising Awareness on Health Hazards of Phthalates in Toys in Armenia**
  https://ipen.org/site/awhhe-report-raising-awareness-health-hazards-phthalates-toys
- **IPEN: Harmful chemicals in toys in the Philippines**
  https://ipen.org/documents/harmful-chemicals-detected-toys-sold-philippines
- **IPEN: Phthalates in Plastic Toys and Childcare Articles in Serbia**
  https://ipen.org/site/cry-game-phthalates-plastic-toys-and-childcare-articles
- **IPEN: Toxic Chemicals in Children's Products in Nepal**
  https://ipen.org/documents/toxic-chemicals-childrens-products-nepal
- **EU Database on Substances of Concern in Products**
  https://echa.europa.eu/scip

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

COMMUNITY OF PRACTICE ON
CHEMICALS IN PRODUCTS
Organized by the SAICM Secretariat and the University of Cape Town

Publié : 3 de 2021
Date de discussion : 17 juin 2021

Résumé de la discussion

Sujet de discussion : Produits chimiques dans les jouets

Cette discussion SAICM/UCT sur la Communauté de pratique des produits chimiques dans les produits (CiP CoP) était axée sur les produits chimiques dans les jouets. Les enfants absorbent les polluants par la bouche, la peau et en les respirant. Comme les enfants ont une activité main-bouche plus importante et une respiration plus rapide, ils absorbent plus de polluants que les adultes par rapport à leur poids corporel. Les jouets constituent un moyen important pour les produits chimiques toxiques de pénétrer dans le corps d'un enfant. De nombreuses études ont révélé des produits chimiques préoccupants dans les jouets achetés dans différents pays et régions, tels que les métaux lourds, les perturbateurs endocriniens et les polluants organiques persistants qui peuvent avoir un effet nocif sur la santé des enfants. Cependant, peu de systèmes réglementaires sont mis en place pour informer sur le contenu de ces produits. Les réglementations sur les produits chimiques dans les jouets dans de nombreux pays ne sont pas avancées ou appliquées, et de nombreux pays manquent d'approches pour garantir la transparence des produits chimiques dans les jouets à l'intérieur et à l'extérieur des chaînes d'approvisionnement. Le marché mondial des jouets connaît une croissance rapide et devrait atteindre 131 milliards de dollars d'ici 2025. L'absence ou le manque d'informations sur les produits chimiques toxiques dans les jouets sur les étiquettes des produits soulève des inquiétudes quant aux effets environnementaux des jouets toxiques, en particulier lorsque les produits sont jetés, jetés dans décharges, ou éliminés par brûlage à l'air libre ou incinération. Les produits chimiques toxiques contenus dans les jouets peuvent être rejetés dans l'environnement, causant de la pollution et affectant la santé. Par conséquent, le but de cette discussion était de comprendre les problèmes de divulgation des produits chimiques préoccupants dans les jouets ; et des suggestions ont été faites pour améliorer les réglementations et la transparence des informations chimiques dans le secteur des jouets afin de garantir que les jouets sont sans danger pour les enfants et l'environnement.

Cette discussion a exploré les aspects sur les produits chimiques dans la réglementation des jouets, la surveillance et le partage d'informations avec les consommateurs dirigés par une équipe dynamique de présentateurs.

Pour afficher la présentation PowerPoint de cette discussion, cliquez sur ici.

À PROPOS DU PRÉSENTATEUR

Olga Speranskaya est co-directeur de Health and Environment Justice Support (HEJSupport), une organisation internationale visant à atteindre un environnement sain et une justice environnementale pour les personnes. HEJSupport travaille au niveau politique mondial, régional et national et directement avec les communautés affectées par les produits chimiques toxiques et les déchets. Le Dr Speranskaya est également conseiller principal au Réseau international d'élimination des polluants (IPEN), un réseau mondial d'organisations à but non lucratif dans plus de 120 pays qui travaillent ensemble pour un environnement sans produits toxiques. Elle a reçu les prix les prix Goldman 2009 et 2011 du PNUE Earth Champion pour l'activisme environnemental de base en Europe de l'Est, dans le Caucase et en Asie centrale.info@hej-support.org ; http://hej-support.org

Varuzhan Gyurjyanest administrateur de Mankan LLC, le principal fabricant de jouets en Arménie. Le premier magasin de jouets a été ouvert à Erevan en 1998. L'entreprise produit des jouets pour Arménie et autres pays de l'Union économique eurasienne et UE. http://www.mankan.am

Gohar Khodjayan est un Spécialiste en communication à ONG des Femmes Arméniennes pour la santé et un environnement sain (AWHHE) basée à Erevan, en Arménie. Depuis 1999, AWHHE a mis en œuvre avec succès plus de 140 projets. AWHHE est le point focal national de l'ONG SAICM et membre du Réseau international pour l'élimination des polluants (IPEN). Mme Gohar Khojayan est responsable de l'éducation du public, du plaidoyer et de la participation des parties prenantes. Elle représente AWHHE dans les processus liés à la SAICM. office@awhhe.am; http://www.awhhe.am

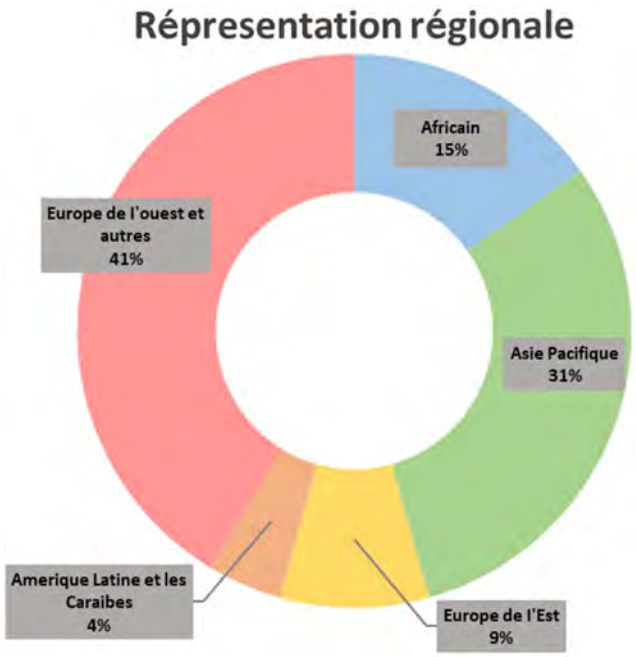
Thony Dizon travaille pour EcoWaste Coalition depuis plus de 10 ans. Il gère la campagne de sécurité chimique de l'organisation à travers le projet Toxic-Free point focal national de l'ONG SAICM et membre du Réseau international pour les droits de l'homme et le développement durable aux Philippines (Project Toxic-Free Philippines).info@ecowastecoalition.org; http://ecowaastecoalition.blogspot.com

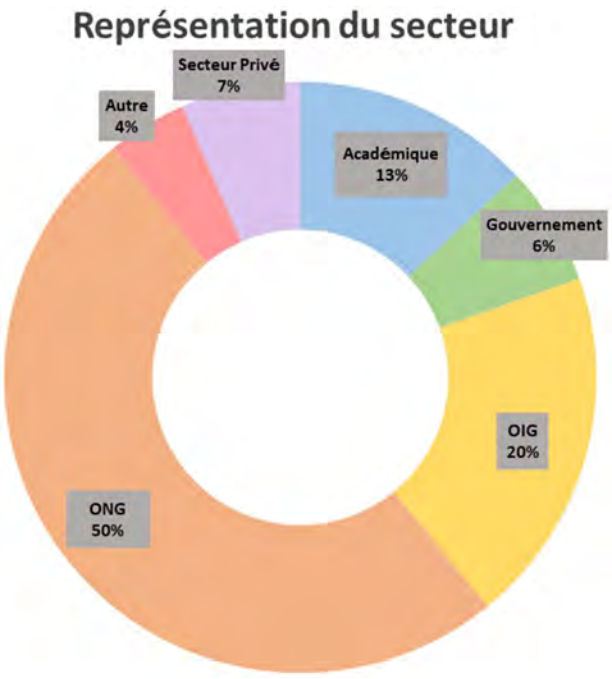
Ram Charitra Sah, détient un B.Sc. en foresterie et M.Sc. Sciences de l'environnement. Il est directeur exécutif et scientifique de l'environnement au Centre pour la santé publique et le développement environnemental (CEPHED) dédié à la protection de la santé publique et de l'environnement par la recherche, la sensibilisation et le renforcement des capacités, et le dialogue politique. Le CEPHED est une organisation participant à l'IPEN et a fait partie de campagnes mondiales et nationales et de travaux de plaidoyer sur les produits chimiques

toxiques, la santé et l'environnement. M. Charita Sah a été le pionnier de la question de la sécurité chimique et des produits chimiques toxiques au Népal en menant des recherches révolutionnaires dans ce domaine.info@cephed.org.np; www.cephed.org.np

2021 DISCUSSION 3 RÉPARTITION DE LA PRÉSENCE

TOTAL DISCUSSION 3 PARTICIPANTS: 46
Femmes – 57%
Hommes – 41 %
Inconnu –2 %





Clé:
OIG – Organisations intergouvernementales
ONG – Organisations non gouvernementales

Communauté de pratique sur les produits chimiques dans les produits 2021 Discussion 3

Il y a trois domaines clés identifiés et discutés en relation avec les produits chimiques dans les jouets :

1. Réglementer les produits chimiques dans les jouets

- 80 % des pays participants sont parties à la Convention relative aux droits de l'enfant (CDE) et pourtant, la plupart des pays à revenu faible et intermédiaire (PRFI) participants n'ont ni législation sur les produits chimiques ni législation spécifique réglementant les produits chimiques dans les jouets.
- Le rapport du Rapporteur spécial sur les implications pour les droits de l'homme de la gestion et de l'élimination écologiquement rationnelles des substances et déchets dangereux, met en lumière diverses violations des droits de l'enfant et déclare que « les entreprises ont la responsabilité de respecter les droits de l'enfant » et « d'empêcher les enfants d'être exposés à des substances toxiques provenant de leurs activités, à la fois directement et indirectement ». Le rapport demande en outre une attention particulière « au potentiel pour les

enfants d'être exposés à des substances toxiques par leurs activités, à travers les produits qu'ils fabriquent ou vendent ».

- Différentes régions et pays ont des réglementations différentes, et il n'y a pas de législation internationale pour restreindre les produits chimiques dangereux dans les jouets. Tous ceux qui ont participé au sondage (N=22) ont estimé qu'il est nécessaire d'adopter une approche globale des produits chimiques dans la réglementation des jouets.
- **Les fabricants de jouets sont un acteur clé dans la réduction et l'élimination des produits chimiques dangereux dans les jouets**. Il a été souligné que les fabricants de jouets devraient se conformer aux juridictions nationales et/ou régionales afin de ne pas exporter de jouets dangereux. (Par exemple, la directive de l'UE et le règlement technique de l'Union économique eurasienne sur la sécurité des jouets).

2. Surveillance des produits chimiques dans les jouets

- De nombreux participants ont mentionné que bien qu'il y ait actuellement un manque de surveillance des jouets et des produits chimiques préoccupants dans les jouets dans leurs pays, l'importance de ce type de surveillance est reconnue.
- **Gouvernements, instituts scientifiques et ONG** jouent un rôle essentiel en soutenant et en menant des recherches sur les effets nocifs des jouets. Ils sont également essentiels pour identifier des alternatives et soutenir une évaluation plus approfondie afin d'éviter des substitutions regrettables (c'est-à-dire le remplacement d'un produit chimique par un autre qui est finalement également dangereux).
- **Surveillance** de produits chimiques toxiques dans les jouets peut déclencher des décisions législatives importantes.
- **De bonnes données sont nécessaires pour une action en justice.** Par exemple, les données générées par l'enquête de marché périodique menée par EcoWaste Coalition aux Philippines ont été utilisées pour constituer un dossier juridique en 2018. Cela a conduit à la Loi sur l'étiquetage de la sécurité des jouets et des jeux promulgués en 2019.

3. Accès des consommateurs à l'information

- **Des informations précises et détaillées** sur les emballages et les étiquettes des jouets sont essentiels pour que les consommateurs aient accès à l'information.
- **Les règles et systèmes d'étiquetage des jouets diffèrent d'une région à l'autre et d'un pays à l'autre.**
- Certaines étiquettes peuvent induire les consommateurs en erreur avec de fausses informations ou ne contenir aucune information d'avertissement pour les acheteurs sur le danger des produits chimiques contenus dans le jouet.
- L'Agence européenne des produits chimiques a donné un bon exemple de divulgation de substances toxiques dans les produits en développant une base de données qui offre une plus grande transparence des informations aux fabricants, consommateurs, recycleurs. Les exigences exigent que toutes les substances extrêmement préoccupantes identifiées dans le cadre de la législation chimique de l'UE REACH dans des concentrations d'au moins 0,1% en poids de tous les composants constitutifs des produits, soient signalées à l'Agence européenne des produits chimiques et soient incluses dans la base de données.
- L'absence ou le manque d'informations sur les produits chimiques toxiques dans les jouets sur les étiquettes des produits a soulevé des inquiétudes quant aux effets environnementaux des jouets toxiques, en particulier lorsque les produits sont jetés, jetés dans des décharges ou éliminés par combustion à ciel ouvert ou incinération. Les produits chimiques toxiques contenus dans les jouets peuvent être rejetés dans l'environnement, causant de la pollution et affectant la santé.

ANNEXE

RÉSUMÉ DÉTAILLÉ DE LA DISCUSSION 3:

LA DISCUSSION A ÉTÉ STRUCTURÉE AUTOUR DE TROIS QUESTIONS ET LES PRINCIPALES APPORTS DE DISCUSSION DES PARTICIPANTS SONT PRÉSENTÉS SOUS CHACUNE:

Question 1. Votre pays a-t-il des réglementations sur les produits chimiques préoccupants dans les jouets, sont-elles fonctionnelles et appliquées et quels produits chimiques dans les jouets sont réglementés?

Résumé des commentaires de différents pays et secteurs, bien que pas nécessairement représentatifs:

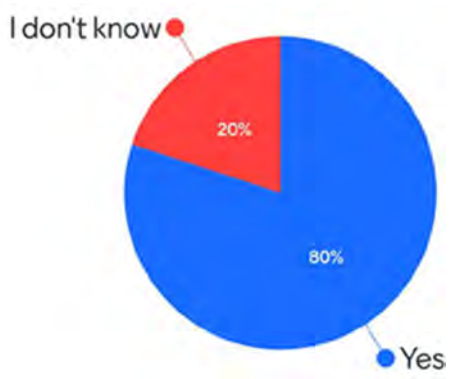
ARMÉNIE (Secteur privé)	- Mankan, un fabricant de jouets en Arménie, fabrique actuellement des peluches. - Les matériaux utilisés sont organiques et ne contiennent donc aucun élément toxique.
BANGLADESH (ONG)	- Malheureusement, il n'y a pas de réglementation sur les produits chimiques utilisés dans les jouets. - L'Organisation pour l'environnement et le développement social (ESDO) a préparé un rapport d'étude sur les « Jouets toxiques : contenu en métaux lourds et perception du public au Bangladesh » en 2013. - Dans la continuité de la surveillance des jouets toxiques, ESDO a effectué des recherches approfondies sur le BPA (bisphénol A). - Le BPA est utilisé pour fabriquer des jouets, des contenants de stockage de nourriture, des équipements de sport, des bouteilles en plastique, y compris des bouteilles d'eau, des équipements électroniques, des scellants dentaires, des CD et des DVD. - Il affecte fortement le système nerveux, cardiovasculaire, endocrinien et provoque l'obésité, le diabète et le cancer dans les cas graves. - L'ESDO avait examiné 12 échantillons de jouets et sondé les consommateurs et les détaillants de jouets. - Un laboratoire de l'Université du Minnesota Duluth, aux États-Unis, a effectué les tests. - La teneur moyenne en BPA était de 0,87 (µg/L) dans les échantillons. - C'est 22 fois plus élevé que la limite autorisée standard de l'UE. - Il était également évident que la couleur jaune a un niveau de BPA systématiquement plus élevé dans notre résultat d'échantillon, tandis que le plus bas était dans les échantillons de couleur verte et blanche. - Selon l'enquête de l'ESDO, les jouets sont les produits les plus achetés et une grande partie (95 %) de la population interrogée n'est pas au courant des effets du BPA sur la santé. - ESDO travaille à étendre ce rapport aux peintures contenant du plomb qui sont utilisées dans les jouets. - **Lien du rapport:** https://ipen.org/sites/default/files/documents/ESDO%20Study%20Report%20on%20Toxic%20Toys%20in%20Bangladesh.pdf
CAMEROUN (ONG)	**Apport français:** - Il n'y a pas de loi spéciale au Cameroun sur les produits chimiques et les jouets pour enfants. - Le Cameroun est membre de la SAICM et reste soumis à ses exigences. - De plus, le pays a signé et des conventions internationales sur les produits chimiques tels que Stockholm, Bâle, etc… - Des efforts restent à faire au niveau national en ce qui concerne les produits chimiques et les jouets.
ALLEMAGNE (ONG)	- Les inquiétudes récentes de l'UE vont vers la vente en ligne de jouets. - Dans l'UE, la directive Safe Toys réglemente les produits chimiques, cependant, il existe plusieurs lacunes. - Les CMR ne sont interdits qu'à la surface des jouets, mais de nombreux désinfectants, allergènes, neurotoxines et EDC ne sont pas réglementés. - Il existe des réglementations locales et régionales, mais à l'ère d'eBay et d'Amazon et des achats internationaux, cela ne fonctionne pas toujours.
HONG KONG (Secteur privé)	- Une approche pourrait être une approche de précaution, comme l'ordonnance suisse sur les encres d'imprimerie. - Une autre approche pourrait être d'avoir une liste positive. - Si quelqu'un souhaite utiliser un nouveau produit chimique, il doit partager les données toxicologiques.
L'IRAN (Académique)	- Il y a beaucoup de nouvelles et d'alertes dans les journaux locaux sur le danger des produits chimiques dans les jouets.

	-	Pas au courant des réglementations gouvernementales sur les produits chimiques dans les jouets.
NÉPAL (ONG)	-	Toys Standard Adopté le 16 janvier 2017, est entré en vigueur le 18 juin 2017 et suspendu le 17 novembre 2017 en raison de la pression du secteur des entreprises.
	-	La norme comprenait 12 produits chimiques : plomb, mercure, cadmium, chrome, arsenic, zinc, sélénium, antimoine, baryum, brome, BPA et phtalates
	-	Une nouvelle norme plus faible a été suggérée en 2018 et ne contient pas de BPA, de phtalate, de zinc ou de brome.
	-	Cela n'a pas encore été publié dans la Gazette.
	-	Une norme aidera les consommateurs à obtenir des produits plus sûrs, aidera le gouvernement à réglementer l'importation et l'exportation et la protection des consommateurs, aidera l'industrie à stimuler ses exportations, ses revenus et son image.
	-	De nouveaux produits chimiques entrent dans la chaîne d'approvisionnement des jouets, il faut donc générer davantage de preuves à l'échelle mondiale pour suivre la toxicité de ces nouveaux produits chimiques.
	-	Des alternatives plus sûres sont disponibles.
	-	Le développement de la science et de la technologie serait bénéfique.
	-	Le gouvernement du Népal a effectué une surveillance des jouets pendant le processus d'adoption de normes obligatoires, mais le rapport n'a jamais été rendu public.
PHILIPPINES (ONG)	-	Aux Philippines, certains produits chimiques contenus dans les jouets sont réglementés, mais pas tous.
	-	La mise en œuvre et l'application sont toujours préoccupantes.
AFRIQUE DU SUD (Académique)	-	Pas de politique de gestion des produits chimiques ni de réglementation pour les jouets.
	-	Ceci est problématique car les fabricants n'ont pas besoin de divulguer des informations sur les produits chimiques contenus dans leurs produits.
SRI LANKA (ONG)	-	Il n'y a pas de loi sur ces produits chimiques.
	-	Malheureusement, il n'y a pas d'installations pour vérifier les jouets.
	-	L'élaboration d'une réglementation profitera au Sri Lanka, en particulier si l'on pense aux familles à revenu faible et moyen qui ne peuvent pas se permettre des jouets coûteux censés être sûrs.
	-	Si des tests sont effectués et des demandes de limites réglementées établies ou une certification par un tiers établie, cela contribuerait à créer un marché des jouets sûrs.
SURINAM (Gouvernement)	-	Pas encore de réglementation sur les produits chimiques dans les jouets.
LES ÉTATS-UNIS D'AMÉRIQUE (Secteur privé)	-	Il existe des restrictions chimiques efficaces.
	-	Celles-ci sont effectivement appliquées aux ports d'entrée et par la surveillance/le rappel des détaillants.
	-	Les éléments lourds, les phtalates, les nitrosamines sont spécifiquement limités, et tout les CMR, irritants oculaires et cutanés, matières toxiques aiguës ou chroniques sont également interdits.
COMMENTAIRES DU PRÉSENTATEUR (HEJSupport International)	-	Seul un nombre limité de produits chimiques sont réglementés dans les jouets.
	-	Les listes de produits chimiques réglementés dans les jouets varient.
	-	Il y a peu de chevauchements entre les politiques existantes, ce qui entraîne des niveaux de protection différents pour les enfants vivant dans différents pays et régions.
	-	Il n'y a pas de législation internationale sur laquelle les produits chimiques devraient être interdits ou limités dans les jouets en premier lieu. Par conséquent, les fabricants de jouets doivent se conformer aux exigences des différentes juridictions afin de pouvoir exporter leurs produits.

Tout au long de la discussion, des sondages informels ont été menés pour aider à encourager la discussion entre les participants. Ils ne fournissent aucune donnée représentative.

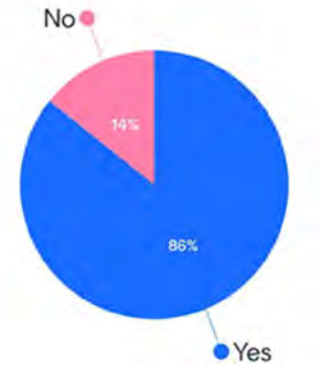
Résultats du sondage 1 (N=5):

Votre pays est-il partie à la Convention des droits de l'enfant (CDE)?



Résultats du sondage 2 (N=7):

Les droits de l'enfant sont-ils reconnus dans la Constitution de votre pays?



Résultats du sondage 3 (N=22):

Serait-il bon d'avoir une approche globale des produits chimiques dans la réglementation des jouets ?

Oui -100%
Non - 0%

Résultats du sondage 4 (N=18):

En quoi serait-il avantageux d'avoir des réglementations sur les produits chimiques dans les jouets en place dans votre pays?

Santé et sécurité de la santé humaine et de l'environnement (n = 12):

- « La réponse est claire : la sécurité des enfants, des travailleurs et de l'environnement.
- « Plus sûr pour les enfants »
- "Cela garantirait que la responsabilité de protéger les enfants ne repose pas entièrement sur les épaules des parents ou du tuteur de l'enfant, mais aussi sur les fabricants et le gouvernement."
- « Les enfants sont plus sensibles que les adultes aux effets des produits chimiques ; le jeu est une activité de développement critique et devrait être sûr ».
- « Plus sûr pour l'environnement (lors du recyclage en fin de vie). »
- « Aidez les consommateurs à obtenir des produits plus sûrs. »
- « La réglementation chimique a surtout profité à la santé humaine et à l'environnement.
- « Cela créerait un environnement sain et la génération future. »
- « Sauvez les futures personnes des produits chimiques toxiques. Créer un environnement sûr et des opportunités commerciales équitables ».
- "Plus sûr pour l'environnement et la santé humaine."
- « Plus de sécurité pour les enfants, plus de transparence ».
- "Nous devons développer une législation bien avancée pour assurer la sécurité des enfants et éviter les doubles standards lorsque des jouets interdits dans un pays pour des raisons de sécurité chimique sont importés dans d'autres pays avec des réglementations moins strictes."

Impacts des importations et des exportations (n = 2):

- "Aidez le gouvernement à réglementer l'importation et l'exportation et la protection des consommateurs et aidera l'industrie à stimuler ses exportations, ses revenus et son image."
- « Coût croissant des jouets ».

Génération et partage d'informations (n = 4):

- « Ainsi, les consommateurs peuvent faire un choix éclairé et réduire l'exposition des enfants aux produits chimiques nocifs. »
- "Plus de clarté dans la chaîne d'approvisionnement."
- « Parce que de nouveaux produits chimiques entrent dans la chaîne d'approvisionnement des jouets, davantage de preuves toxiques sont générées à l'échelle mondiale, des alternatives plus sûres sont disponibles, le développement de la science et de la technologie. »
- « Parce que de nouvelles données scientifiques émergent. »

Sondage 5 Résultats (N=5):

Pourquoi les réglementations sur les produits chimiques dans les jouets devraient-elles être continuellement révisées?

Nouvelles informations (n = 2):

- « Basé sur de nouvelles informations issues de l'étude. »
- « Parce que les nouveaux produits chimiques quotidiens sont identifiés comme dangereux ou toxiques. »

Développement de nouveaux produits chimiques (n = 3):

- « Parce que de nouveaux produits chimiques entrent dans la chaîne d'approvisionnement des jouets, davantage de substances toxiques sont générées dans le monde, des alternatives plus sûres sont disponibles, le développement de la science et de la technologie. »
- « L'industrie développe de nouvelles substances ; la protection de la santé des enfants doit être un effort continu.
- « Pour suivre le rythme de l'innovation dans les jouets et les nouvelles sciences. »

Question 2. Si votre pays contrôle les produits chimiques dans les jouets, ces informations sont-elles accessibles au public ? Si votre pays n'effectue pas de surveillance des produits chimiques dans les jouets, que faut-il pour que cela se produise?

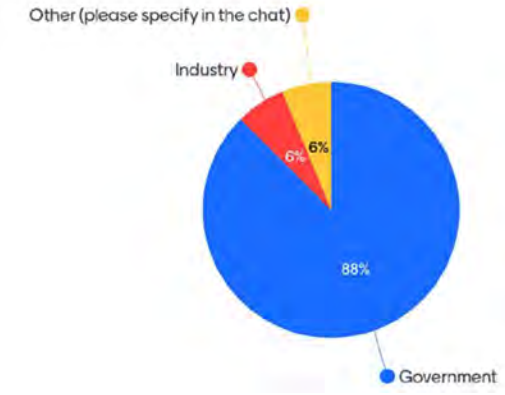
ARMÉNIE (ONG)	- Les consommateurs devraient avoir plus de voix. - L'étiquetage est un problème déterminé par la demande - les mères ou les gardiens d'enfants doivent être informés et doivent disposer d'outils pour influencer le suivi. - En Arménie, les groupes de parents (mères) dans les jardins d'enfants sont une force !
CAMEROUN (ONG)	**Apport français:** - En 2020, avec le soutien de l'IPEN, des échantillons de jouets pour enfants sur le marché ont été collectés et analysés. - Les résultats sont destinés à être rendus publics afin d'intensifier les actions de veille et de plaidoyer pour un cadre juridique et réglementaire au niveau national.
ALLEMAGNE (ONG)	- La liste Rappex est utilisée dans l'UE. - L'UE offre un accès public à ses directives et documents, mais il n'existe aucun système sur les produits signalant des taux élevés de produits chimiques spécifiques. - D'un autre côté, les jouets qui ont SHC ne sont pas autorisés à arriver sur le marché. - Cependant, il existe un énorme écart en termes de surveillance des jouets vendus en ligne en Allemagne et dans l'UE.
HONG KONG (Secteur privé)	- Les jouets écologiques sont une solution possible. - **Veuillez remplir le sondage ci-dessous concernant les jouets écologiques: https://rebrand.ly/ECO-Friendly-Toys-Survey** - Il sera utile de voir une fois que l'UE ouvrira les informations SCIP pour les consommateurs, liées au plan de transparence des produits de l'UE.
L'IRAN (Académique)	- Les médias, la télévision, les journaux, etc… sont utiles pour partager l'information. - Il y a des informations sur différents bisphénols, formaldéhydes, polyphénols, etc… dans les jouets et comment les éviter dans les actualités iraniennes. - La source: https://irchem.ir - Il est de la responsabilité du gouvernement, des ONG, du système académique, etc… de sensibiliser la population. - Les agences de réglementation mondiales ont la responsabilité de s'assurer que toutes ces lois et réglementations dans les pays en développement sont en place, sont en règle et mises à jour et sont APPLIQUÉES !
NÉPAL (ONG)	- Comme il n'y a pas de règlement sur les enfants, aucun contrôle n'est en cours. - Tout d'abord, chaque pays qui a adopté la politique émergente de la SAICM CIP et qui est partie au CRC, devrait promulguer une réglementation sur les jouets avec la fourniture obligatoire d'une surveillance régulière du marché et de l'industrie et rendre les résultats publics.

	- Surveiller sans rendre le résultat public n'a pas de sens pour le public qui a besoin d'être protégé. - Disposer d'une politique de surveillance, d'un plan, d'une infrastructure de test (laboratoire de bonne qualité, formation et ressources humaines) et d'une allocation suffisante du budget annuel national est essentiel pour effectuer la surveillance des produits chimiques dans les jouets. - L'engagement d'un public plus large de parties prenantes, en particulier les ONG de santé infantile, les droits de l'enfant et la protection de l'enfance et les sociétés pédiatriques - Le rôle principal de surveillance des jouets devrait être assuré par le gouvernement. - Cependant, les ONG ont joué et continuent de jouer un rôle vital dans de nombreux pays dans la surveillance des produits chimiques dans les jouets pour enfants. - Le milieu universitaire peut également faire le suivi. - Il devrait y avoir une disposition obligatoire dans chaque entreprise et industrie de fabrication de jouets pour tester chaque lot de jouets avant qu'il ne quitte les locaux de l'industrie pour le marché. - Les industries doivent maintenir les normes par elles-mêmes. - Il n'y a pas non plus de contrôle des produits en ligne, y compris les jouets vendus au Népal.
PHILIPPINES (ONG)	- La réglementation du contrôle des jouets vendus en ligne pose toujours problème. - Pendant la pandémie, la vente de produits, y compris de jouets, sur les plateformes d'achat en ligne a explosé, de sorte qu'un problème de surveillance et de réglementation de la sécurité devient une préoccupation majeure.
QATAR (Gouvernement)	- Il n'y a pas de surveillance au Qatar. - Travaille actuellement sur la législation, ce qui prendra un certain temps en raison des différentes entités impliquées.
AFRIQUE DU SUD (Académique)	- L'Afrique du Sud n'effectue aucune surveillance. - Il faudrait pour cela qu'il y ait une loi. - Si la législation l'exigeait, les chercheurs et autres institutions pourraient aider le gouvernement avec les données nécessaires à la surveillance, mais en fin de compte, le gouvernement doit exercer une surveillance.
SRI LANKA (ONG)	- Il faut d'abord établir les règles et réglementations nécessaires pour les jouets chimiquement sûrs.
LES ÉTATS-UNIS D'AMÉRIQUE (Gouvernement)	- Les ressources gouvernementales sont limitées pour le maintien et l'évolution cohérente des programmes de réglementation. - Les agences nationales de compétence pourraient collaborer avec les parties prenantes (universitaires, y compris) et aider à l'éducation, à l'information et aux changements de comportement, y compris l'étude et l'évaluation des questions d'intérêt local et/ou national. - S'engager et s'engager dans un projet pertinent est souvent une expérience précieuse et aide à améliorer la sensibilisation et l'engagement, le cas échéant.
LES ÉTATS-UNIS D'AMÉRIQUE (Secteur privé)	- La CPSC des États-Unis exige une certification obligatoire de tous les jouets et des contrôles aux points d'entrée, en ligne et au niveau de la vente au détail. - L'industrie doit être la première ligne de surveillance des produits chimiques, mais le gouvernement doit être actif dans ce domaine pour dissuader les opérateurs malhonnêtes. - L'erreur fondamentale dans toutes les questions discutées est qu'elles se concentrent sur le contenu chimique, et non sur l'exposition potentielle ou le risque réel. - La norme népalaise proposée par le CEPHED était impraticable et le gouvernement a par la suite accepté de s'aligner sur les normes internationales de sécurité des jouets.
ZAMBIE (ONG)	- Mettre en place un contrôle juridiquement contraignant en promulguant la loi pour éliminer progressivement la peinture au plomb et le plomb dans les jouets serait la meilleure solution possible.
COMMENTAIRES DU PRÉSENTATEUR (HEJSupport International) :	- La surveillance des produits chimiques dans les jouets pourrait déclencher l'élaboration de réglementations dans les pays où il n'existe pas de législation réglementant les produits chimiques dans les jouets. - **Ceci est le lien vers l'examen du PNUE des politiques et réglementations relatives à la sécurité des jouets liés aux produits chimiques dans certains pays à revenu faible et intermédiaire: https://saicmknowledge.org/sites/default/files/publications/UNEP_Review_Toy_Safety_policies_LMIC_final.pdf** - De nombreux pays n'ont toujours pas de réglementation sur les jouets. - Ce n'est pas une excuse pour ne pas surveiller les produits chimiques dans les jouets. - Comme cela a été noté dans les présentations d'aujourd'hui, la surveillance des produits chimiques dans les jouets peut être un point de départ pour les parties prenantes afin d'initier le développement de la législation. - Les jouets vendus en ligne sont particulièrement préoccupants car ils sont généralement beaucoup moins réglementés.

- L'idée d'une base de données mondiale accessible au public sur les substances chimiques préoccupantes dans les jouets (en utilisant la base de données SCIP de l'UE à titre d'exemple) sera utile pour les consommateurs, les fabricants et les recycleurs.
- À partir de juillet 2021, tous les jouets vendus en ligne dans l'Union économique eurasienne devront se conformer au règlement technique de l'UEE sur la sécurité des jouets. C'était en grande partie le résultat de la pression publique et des demandes des consommateurs pour la sécurité des jouets.

Sondage 6 Résultats (N=16):

À qui pensez-vous qu'il incombe de surveiller les substances chimiques préoccupantes dans les jouets?



Sondage 7 Résultats (N=18):

Existe-t-il une liste des jouets pour enfants rappelés et interdits dans votre pays ? Répondez oui, non ou je ne sais pas et indiquez le pays d'où vous venez.

Non – 12 (67%)
Oui – 5 (28%)
Je ne sais pas – 1 (5)

Pays qui ont dit « oui » :	Pays qui ont dit « non » :	Pays qui ont dit « Je ne sais pas » :
L'Iran	Népal	Allemagne
L'Union européenne	Philippines	
les états-unis d'Amérique	Sri Lanka	
	Afrique du Sud	

Résultats du sondage 8 (N=14):

Comment les jouets vendus en ligne sont-ils contrôlés dans votre pays?

Pas de suivi – 11 (79 %)
Suivi effectué – 3 (21 %)

Question 3. Comment le fait de connaître les produits chimiques préoccupants contenus dans les jouets aidera-t-il les consommateurs et les autorités de réglementation de votre pays à faire le bon choix?

ARMÉNIE (ONG)	- Le recyclage des déchets dangereux en de nouveaux produits est une préoccupation majeure. - Si elle est développée, la base de données mondiale devrait être maintenue dans au moins toutes les langues des Nations Unies. - Cette discussion a identifié un certain nombre de problèmes qui pourraient déjà être repris pour un suivi/une action mondiale.
CAMEROUN (ONG)	**Apport français:** - Connaître les substances chimiques contenues dans les produits et jouets, limiter les risques chimiques, protéger la santé des enfants et l'environnement. - Le respect de l'étiquetage doit être exigé avec la description des composants du produit dans la langue nationale du lieu de commercialisation.
ALLEMAGNE (ONG)	- Il y a un énorme manque d'informations sur les substances dangereuses (HS) dans les jouets du côté public en Allemagne. - C'est à nous, OSC, d'informer le public. - WECF, depuis plus de dix ans, mène un programme appelé www.nesting.org, informer sur le SH dans les produits et comment éviter les risques, y compris en demandant des réglementations. - Notre brochure sur les jouets est disponible en 10 langues ; Vous pouvez le trouver ici:https://nestbau.info/broschueren/ - Une base de données permettrait d'éviter le retour du SH dans les produits à partir de matériaux recyclés.
HONG KONG (Secteur privé)	- Je pense que tout ce dont nous parlons peut-être appliqué à toutes sortes de produits de consommation, en particulier les produits sensibles comme les jouets, les cosmétiques, les textiles, les emballages alimentaires etc… - Puisqu'ils vont sur notre peau, et nous les consommons. - Oui, la base de données serait bonne pour la transparence (tout en protégeant les informations confidentielles) et aidera à l'application et à la surveillance.
L'IRAN (Académique)	- En Iran, il y a déjà beaucoup d'informations disponibles sur les produits chimiques dans les jouets à la télévision, dans les journaux, etc. - Comme d'habitude, des articles universitaires sortent, mais il semble que le gouvernement soit en retard sur le calendrier pour attraper, suivre et appliquer. - Cela peut être dû aux récents problèmes et sanctions mondiaux.
NÉPAL (ONG)	- Une fois que les substances chimiques préoccupantes dans les jouets sont connues, les consommateurs peuvent faire des choix et des achats éclairés. - Le gouvernement peut facilement et efficacement réglementer les jouets toxiques. - Les entreprises productrices de jouets peuvent améliorer leur image et leur réputation, ainsi que stimuler leurs exportations et leurs revenus. - Les informations concernant tous les produits chimiques préoccupants doivent être correctement étiquetées conformément à la pratique standard internationale. - Une allocation appropriée de l'espace d'étiquetage, un langage compréhensible, une taille de police et une couleur clairement visible sont également nécessaires. - L'étiquette doit également être accompagnée des panneaux d'avertissement car elle est très essentielle. - Les premières informations sur les produits chimiques nocifs pour la santé devraient être communiquées au public. Les informations alarmantes doivent être imprimées en rouge. - Il devrait y avoir l'intention de rendre les produits recyclés aussi sûrs que les produits originaux. - L'étiquetage des produits chimiques dans les jouets profite à la gestion des déchets. - Étant donné que les pratiques et les approches de gestion des déchets contenant des produits chimiques et des déchets généraux sont complètement différentes. - Cela contribuera également à réduire la charge environnementale des produits chimiques toxiques ainsi qu'à éliminer les sources d'exposition professionnelle de la main-d'œuvre de traitement des déchets. - Des produits recyclés plus sûrs atteindront les mains du consommateur. - Les gens devraient apprendre où et comment éliminer les produits chimiques et les déchets chimiques ou les jouets de manière appropriée. - Les mentalités des dirigeants politiques devraient également être modifiées.

PHILIPPINES (ONG)	-	Les informations d'étiquetage sont importantes car elles donneront au consommateur le droit de savoir.
QATAR (Gouvernement)	-	Pour aider à évaluer les risques pour la santé et la gestion du traitement des déchets.
AFRIQUE DU SUD (Académique)	-	Il est important d'avoir des produits chimiques sur les étiquettes, mais ce n'est qu'une étape.
	-	Les consommateurs ont alors besoin d'informations sur les produits chimiques et les risques pour leurs enfants, ainsi que d'un accès à des jouets alternatifs non toxiques.
LES ÉTATS-UNIS D'AMÉRIQUE (Secteur privé)	-	La divulgation complète des ingrédients est inutile et non souhaitée par la plupart des consommateurs.
	-	Cette information serait déroutante et inutilement alarmante.
	-	Seules les informations nécessaires à une manipulation et à une utilisation en toute sécurité doivent être divulguées.
	-	Une meilleure sécurité des jouets ne sera pas obtenue par des exigences supplémentaires ou la divulgation des ingrédients, mais par une bien meilleure application des normes existantes.
LES ÉTATS-UNIS D'AMÉRIQUE (Gouvernement)	-	Protection des droits des consommateurs.
COMMENTAIRES DU PRÉSENTATEUR (HEJSupport International) :	-	Les produits chimiques toxiques n'ont pas leur place dans les jouets.
	-	Il existe jusqu'à 350 000 produits chimiques sur le marché mondial. La plupart d'entre eux n'ont pas été testés pour leurs propriétés dangereuses.
	-	Seul un nombre limité de produits chimiques est réglementé dans les jouets.
	-	Il existe des différences significatives entre les exigences de sécurité pour les substances chimiques dans les jouets entre les pays et les régions.
	-	L'approche chimique par produit chimique est appliquée dans la plupart des réglementations existantes.
	-	Les consommateurs, les détaillants et les recycleurs ignorent en grande partie le contenu chimique des jouets.
	-	De bonnes initiatives sont en route. Cependant, étant donné la nature internationale du secteur du jouet, y compris la chaîne d'approvisionnement, des exigences internationales plus strictes sont nécessaires pour garantir que les jouets sont également sûrs pour tous les enfants du monde entier.
	-	La divulgation du contenu toxique des jouets aidera les consommateurs et les détaillants à plaider en faveur d'une réglementation et d'une application strictes.

Résultats du sondage 9 (N=10):

Quelles informations sur les produits chimiques devraient figurer sur les étiquettes des jouets ? Doit-il être accompagné des signes avant-coureurs?

Informations sur les produits chimiques préoccupants (n = 4):

- « Des signes oui, langue nationale ! Produits chimiques préoccupants, divulgation complète.
- Si des produits chimiques réglementés préoccupants sont présents dans les jouets, cela doit être clairement indiqué sur l'étiquette et des panneaux d'avertissement doivent être inclus.
- Il devrait y avoir des informations sur les produits chimiques préoccupants utilisés pour fabriquer ces jouets et les risques pour la santé associés à ces produits chimiques.
- Il doit contenir des informations sur tous les produits chimiques préoccupants ainsi que des panneaux d'avertissement. »

Information pour des raisons de sécurité (n = 3):

- « Rien au-delà de ce qui est nécessaire pour une manipulation et une utilisation en toute sécurité. Les consommateurs veulent juste savoir que le produit est sûr à utiliser et que la sécurité est surveillée par le gouvernement. »
- Un signe de sécurité défini provenant d'un système de surveillance serait vraiment utile, car certains parents ne savent pas si un ingrédient est nocif bien qu'il soit mentionné sur l'étiquette.
- "Un système de feux de circulation pourrait être utile."

Informations générales sur les produits chimiques (n = 3):

- « Produits chimiques utilisés/contenu/concentration – doivent être accompagnés de signes avant-coureurs. »
- « Nom des produits chimiques avec les signes codés par couleur pour transmettre le message au public qu'il est dangereux pour certaines activités et applicable à d'autres fins. De plus, il est indispensable de recycler les informations avec les types de plastiques.
- « Quantité de produits chimiques toxiques ».

Sondage 10 Résultats (N=11):

En quoi la connaissance des produits chimiques contenus dans les jouets serait-elle bénéfique pour la gestion des déchets, y compris le recyclage et l'élimination dans votre pays ?

Connaissances et information (n = 4):

- « Cela va aider les acteurs impliqués dans la gestion des déchets ! Ils sauront comment manipuler différents jouets et quel type de gestion des déchets doit être fait en fonction des produits chimiques utilisés dans les jouets.
- « Le type de produits chimiques et les informations sur les types de plastique (1 à 7 codes de plastique) seront bénéfiques pour le vendeur ainsi que pour les vendeurs locaux pour identifier le potentiel de recyclage des jouets et ses valeurs de recyclage sur le marché. »
- « En triant. »
- « L'information donne une chance de réutiliser, de recycler ou d'utiliser un produit de manière appropriée. Le recyclage peut être optimisé pour (plus ou moins) le même niveau de produits, s'il est sûr qu'il n'y a pas de substances dangereuses dans les déchets.

Protection de l'environement (n = 2):

- "Cela protégera l'environnement des produits chimiques nocifs."
- « Les jouets contenant des produits chimiques toxiques ne doivent pas être mis en décharge ou incinérés pour éviter la pollution. »

Élimination, manipulation ou recyclage corrects (n = 4):

- "Eh bien, si les recycleurs étaient concernés, ils pourraient s'assurer que les produits toxiques ne sont pas recyclés en produits de consommation, en particulier en jouets."
- « Des informations sur certains produits chimiques préoccupants (par exemple, les retardateurs de flamme, les phtalates, etc.) seraient bénéfiques pour les recycleurs afin qu'ils sachent quelles sont les utilisations appropriées pour le recyclage. »
- « Oui, cela a particulièrement profité aux réglementations qui comprenaient la responsabilité élargie des producteurs (REP) - la gestion des déchets et une politique d'élimination appropriée. »
- « Empêcher les produits chimiques dangereux de revenir sur le marché en tant que matériaux recyclés, comme cela se produit avec les plastiques. »
- « Évitez le recyclage de produits chimiques toxiques dans de nouveaux produits, en évitant d'acheter des jouets toxiques. »

Résultats du sondage 11 (N=16):

Une base de données mondiale développée dans le cadre de l'approche SCIP serait-elle importante pour parvenir à une plus grande transparence sur les produits chimiques préoccupants dans les jouets?
Oui - (100%)
Non – (0%)

Ressources utiles:

- **Outil Global Chemicals Outlook I**
  https://www.unep.org/resources/report/global-chemicals-outlook-ii-legacies-innovative-solutions

- **OMS (2016) : Prévenir les maladies grâce à des environnements sains**
  https://www.who.int/quantifying_ehimpacts/publications/preventing-disease/en/

- **Assemblée générale des Nations Unies A/HRC/33/41 (2016) : Rapport du Rapporteur spécial sur les implications pour les droits de l'homme de la gestion et de l'élimination écologiquement rationnelles des substances et déchets dangereux**
  https://undocs.org/A/HRC/33/41

- **Examen par le PNUE des politiques et réglementations relatives à la sécurité des jouets liées aux produits chimiques dans certains pays à revenu faible et intermédiaire**
  https://saicmknowledge.org/sites/default/files/publications/UNEP_Review_Toy_Safety_policies_LMIC_final.pdf

- **Directive européenne sur la sécurité des jouets - Substances restreintes dans les jouets**
  https://echa.europa.eu/substances-restricted-toys?p_p_id=eucleflegislationlist_WAR_euclefportlet&p_p_lifecycle=0&p_p_col_id=column-1&p_p_col_count=1

- **Produits chimiques préoccupants dans les jouets en plastique – ScienceDirect**
  https://www.sciencedirect.com/science/article/pii/S0160412020321498?via%3Dihub

- **Étude du PNUE : Des produits chimiques nocifs trouvés dans 25 % des jouets pour enfants**
  http://sdg.iisd.org/news/harmful-chemicals-found-in-25-of-childrens-toys-unep-study-finds/

- **Initiatives IPEN sur les produits chimiques dans les jouets pour enfants**
  https://ipen.org/tags/chemicals-childrens-toys

- **IPEN : Toxiques dans les produits**
  https://ipen.org/site/toxics-products-overview

- **IPEN : Sensibilisation aux dangers pour la santé des phtalates dans les jouets en Arménie**
  https://ipen.org/site/awhhe-report-raising-awareness-health-hazards-phthalates-toys

- **IPEN : Produits chimiques nocifs dans les jouets aux Philippines**
  https://ipen.org/documents/harmful-chemicals-detected-toys-sold-philippines

- **IPEN : Phtalates dans les jouets en plastique et articles de puériculture en Serbie**
  https://ipen.org/site/cry-game-phthalates-plastic-toys-and-childcare-articles

- **IPEN : Produits chimiques toxiques dans les produits pour enfants au Népal**
  https://ipen.org/documents/toxic-chemicals-childrens-products-nepal

- **Base de données de l'UE sur les substances préoccupantes dans les produits**
  https://echa.europa.eu/scip

CoP CIP : Le Secrétariat de l'Approche stratégique de la gestion internationale des produits chimiques (SAICM) et la Division de la santé environnementale de l'Université du Cap (UCT) ont créé cette communauté de pratique (CoP) pour favoriser les discussions en ligne et aborder les questions clés sur les produits chimiques dans les produits (CiP) parmi les parties prenantes des gouvernements, des organisations internationales, de l'industrie, des universités et de la société civile.

Cette CoP contribue au projet SAICM/GEF sur la composante de gestion des connaissances sur les questions de politique relative aux produits chimiques émergents. *Cette activité est soutenue par le projet ID: 9771 du Fonds pour l'environnement mondial (FEM) sur les meilleures pratiques mondiales sur les problèmes émergents de politique chimique dans le cadre de l'Approche stratégique de la gestion internationale des produits chimiques (SAICM).*

Si vous avez des questions ou avez besoin d'éclaircissements sur cette initiative, veuillez contacter le Secrétariat de la SAICM à**saicm.chemicals@un.org** ou UCT à **uctcops@outlook.com**.

Rejoignez la CoP CiPs à: https://saicmknowledge.org/community

Avertissement : Les informations contenues dans ce condensé représentent les opinions des membres participant de différents groupes de parties prenantes exprimées au cours de la discussion. Les opinions exprimées dans ce document ne représentent pas nécessairement l'opinion ou la politique déclarée du Programme des Nations Unies pour l'environnement, du Secrétariat de la SAICM, du FEM ou de UCT, et la citation de noms commerciaux ou de processus commerciaux ne constitue pas une approbation.

COMMUNITY OF PRACTICE ON
CHEMICALS IN **PRODUCTS**
Organized by the SAICM Secretariat and the University of Cape Town

Issue: 4 of 2021
Discussion date: 11th November 2021

Discussion 4 digest

Topic of Discussion: Traceability in the textiles value chain

Traceability in the textile values chain refers to the **ability to trace a product's lifecycle from beginning to end** (e.g., from raw material to the consumer level). Traceability is an important concept when considering the source of chemicals and the potential impact these chemicals may have on the environment and people along their journey through the value chain. Achieving full traceability is another step toward ensuring sound chemicals management which is often not an easy task given the complexity of the value chain and the number of stakeholders involved at each step.

To view the PowerPoint presentation from this discussion, click here.

ABOUT THE PRESENTER

Ahmad Ansari is currently working as one of the ZDHC's Partnerships Director. His role as such is to advance ZDHC's global stakeholder engagement and business development strategies via new partnerships, driving the common goals of sustainable chemistry in the textile, garment, and footwear industries.

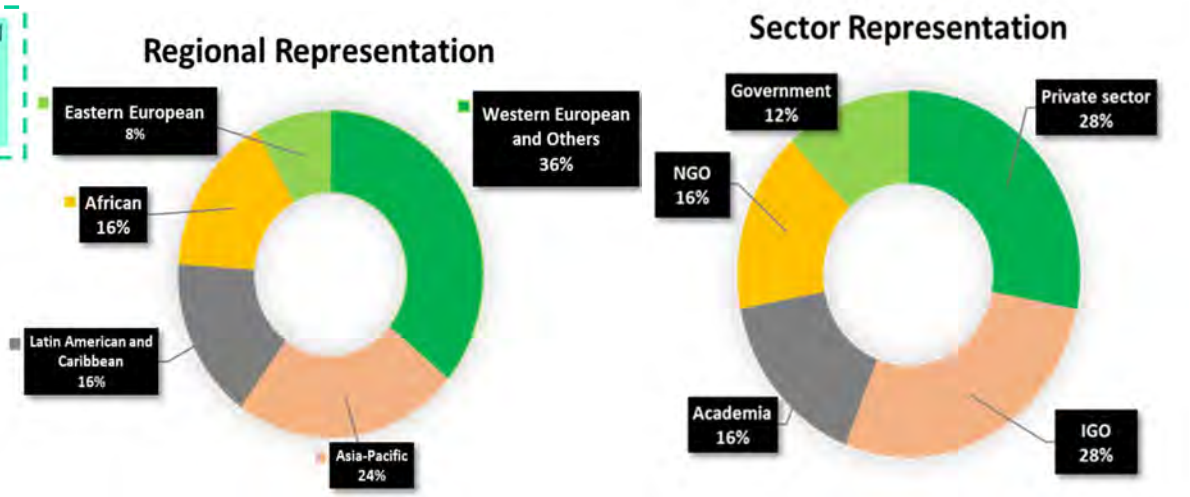
In his previous career, Ahmad has worked for globally known professional service organizations (European Business Manager (BDM) at SGS; Senior Business Manager at KPMG for sustainability & supply chain solutions). Educationally, Ahmad has achieved a Doctorate in Environmental Geochemistry from Erlangen-Nuremberg University in Germany.

Ahmad has 19 years of experience within corporate responsibility (environment, social and supply chain) covering 75 countries within Europe, Asia, and America. Through his professional career, he has been supporting global MNCs to understand their impact on the environment and society, to assess and mitigate risk and to implement business-orientated strategies, actions of engagement and business performance. His professional expertise is focusing on sustainability and related business operation such as corporate responsibility strategies, environmental & social compliance performance measurement & impact, product environmental assessment, supply chain risk assessment & monitoring, business development, and stakeholder engagement.

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).*

2021 DISCUSSION 4 ATTENDANCE BREAKDOWN

TOTAL DISCUSSION 4 ATTENDEES: 25
Female – 13
Male – 12



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

Chemicals in Products Community of Practice 2021 Discussion 4

For the last 10 to 15 years, the textile industry has been working on reducing the harmful chemicals at the end of the product and not from the whole supply chain. The ZDHC as a global community together with the chemical industry worked on a mission to **implement a sustainable chemical management system in the textile, garment, and footwear sector** to support and implement this system in the sector by bringing innovation to three target groups: consumer, workers, and environment. A change of mindset was needed from RSL (**Restricted Substance List**) to MSRL (**Manufacturing Restricted Substances List)** to improve traceability from the prime source and to provide a solution to eliminate the harmful chemicals.

Participants had various experiences with the textile industry in their countries; those from Iran, Hong Kong, and Germany stated that there have been attempts at implementing eco-labels and green labels promising less hazardous substances, as well as the establishment of an MRSL. Hong Kong uses a smart software for textile production known as **Radio Frequency Identification** (RFID) which has the capability to link to accounting software and ensure traceability. However, it is difficult to state the overall overview of the country with regards to traceability in textile industry.

Participants from Armenia, Germany, Hong Kong, and Nepal stated that a system such as the one established and used by the ZDHC has not been established in their countries. Germany stated that there was a lot of business-to-business (B2B) information passed through the supply chain about regulations on traceability and that attempts have been made to ensure traceability but not at a country level. **This system needs to consider the state of the current textile industry including the importing of textiles, fast fashion, lack of knowledge from the consumers and regulation implementation.** Participants from Germany and Iran agreed that traceability helps the invisible hand of the market and will **give consumers the choice to buy clean products.** Traceability should be applied in the sense of **system thinking,** then the value chain can be sustained, and **holistic sustainable chemicals management can be achieved.**

Looking ahead, the ZDHC would like to **build a global harmonized standard and guideline** that can be adopted within the textile community and collaborate with other stakeholders to accelerate the implementation as well as bring a positive impact. The ZHIC can support the industry at a country level and make a significant impact.

ANNEX

DETAILED SUMMARY OF DISCUSSION 4:

THE DISCUSSION WAS STRUCTURED AROUND THREE QUESTIONS.THE KEY DISCUSSION INPUTS FROM PARTICIPANTS ARE PRESENTED UNDER EACH QUESTION:

Question1. What experience do you have with traceability in the textiles industry in your country, if any? If there is currently no traceability in the textile industry, what do you think your country needs to implement it?

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

Country	Participant's responses
GERMANY (NGO)	- In Germany, it is difficult to have an overview of the overall textile industry, but there are lots of national /EU-wide textile labels (eco-labels, green labels) promising no/less hazardous substances or good/better working conditions.
HONG KONG (Private sector)	- In Hong Kong, we've created a mapping of ALL chemical substances and relevant limits in ECO-Labels, proprietary standards, and at different stages: **Manufacturing Restricted Substances List** (MRSL) for Input, **Wastewater** (WW) for waste-output. - It's being reviewed by **GIZ/textile partnership** to be open-sourced and currently being vetted and reviewed for the best mechanism to achieve open source - Link to document preview: https://drive.google.com/file/d/1OWQv7VtKMFmqEnAf7pvx1t8T-thaITm1/view?usp=sharing
IRAN (Academia)	- Smart software for textile production such as **Radio Frequency Identification** (RFID). - These tags carry electronically stored information and are attached to objects/textiles to identify and track them automatically. A link to an accounting software to ensure **traceability.** The RFID is usually **OEKO-TEX 100 certified** (independent testing and certification system for textile raw materials, intermediate and end products at all stages of production guaranteeing to consumers the absence of harmful substances at potentially dangerous levels to the human body) which helps **to trace links** in production Fashion.

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

Poll 1 Results (N=13)

What does chemical traceability mean to you? Please state your country/organisation in your response?

Residues in food and environment (n=2)

- **IRAN**: "Means a lot, pesticide/ chemicals residues in food, environment, etc., as a toxicologist I have always been following the pesticides and chemicals "METABOLITES" usually millions and that is very difficult to follow all of them, impossible."
- **IRAN**: "Fate of chemicals/ pesticides in the environment, etc. "

Follow chemical from origin to end use (n=5)

- **South Africa**: "Traceability means being able to follow a chemical in a substance from its point of origin to its end use and at each step being able to access the necessary health and safety and usage information."
- "To know the supply chain from raw to finished products"
- **Germany**: "It is the most important factor in the whole value chain. ISC3"
- **Nigeria**: "Chemical traceability in a simple term means the ability to monitor the chemicals in products by following a cradle to grave principle of product regulation/management. "
- **TUV Rheinland**: "Information about chemicals composition, geographical origin, and how processed during production."

Protection of consumers (n=2)

- **Armenia**: "Chemical traceability means better protection of consumers, informed choices, healthier industry practices - AWHHE"
- "That product information (chemical information) is accessible to consumers."

Identification of hazardous chemicals in products (n=4)

- "Chemical traceability means to identify the materials used for the textiles, at least hazardous compounds (by RFID tags, washing-resistant QR codes. The EU introduces a compulsory collection of used textiles, this means pressure on the identification."
- **South Africa**: "Being able to identify the hazardous (and other chemicals) in products; that is, having access to this information; particularly for consumers. "
- **Germany, BUND**: "Each textile needs a document giving its fingerprint (Chemical content). Otherwise, recycling of fibres and textiles is not possible (Germany, BUND)."
- "What is the nexus between standards and traceability of the chemicals?"

Poll 3 Results (N=12)

Would a global framework for traceability in the textile industry be useful for your country?

Yes – 75%
No – 8%
I don't know -17%

Question 2. What kind of supply chain mapping and traceability system do you have in your country? If your country does not have any supply chain management, what kind of system do you think would work for traceability?

Country	Participant's responses
ARMENIA (NGO)	- In Armenia, no such system exists. - The textiles were developed in Soviet times, followed by a decline in production and now a rapid rise once again. - As it is growing, it is a good time for introducing new **patterns from the beginning**: actors at all levels of the textile supply chain need to work together to find solutions to technological challenges. - **Education is a key enabling factor** in this connection: are there any education opportunities globally through online tools and workshops?
GERMANY (NGO)	- Well, the **Zero Discharge of Hazardous Chemicals** (ZDHC) is quite known for what it stands for, but I suppose most consumers do not know about the whole process. - Besides several eco-labels which were already mentioned today, there is a lot of Business-to-business (B2B) information in the supply chain. This is partially due to regulations (e.g., The Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH)) and partially comes with ISO 14.000 declarations, etc. - **Information gaps** are mostly with very cheap textiles. i.e., imported "fast fashion". - Is there any collaboration of ZDHC with Partners from Tunisia?
HONG KONG (Private sector)	- **No system exists at the country level**. - A stretch of the imagination as a consumer would be the ability to scan a barcode on garment/footwear and be able to see a code/rating 1-5 (1=no potentially harmful chemicals used; 5=no-no), and an indicator showcasing labor/welfare that the environment was not harmed and then a have supply chain management system to fulfil this. - Is there a possibility that Manufacturing Restricted Substance List (MRSL) guidelines go through some sort of process to convert it into a standard?
NEPAL (NGO)	- The global system did not work in developing and low-income countries. - It should be compatible with the local circumstances and infrastructure development level. - How does chemical traceability work with an online system? - How does chemical traceability work with the Online Marketing business of products? which country is responsible? - When talking about the individual facility level, it must be decided if it is mandatory or voluntary. - Individual facilities intend to avoid any kind of traceability testing. - Infrastructure such as laboratories at the individual level matters for the success of this model which is normally lacking. - Chemicals used in the labelling of packaging materials printing must also be accounted for.

Poll 4 Results (N=12)

Are you familiar with the ZDHC supply chain management and traceability system?

Yes – 25%
No – 58%

Poll 5 Results (N=11)

Are you aware of any other supply chain management initiatives and traceability systems in textiles, or any other sector? Please state your country

Yes - 36%
No – 64%

Countries that said "yes":	**Countries that said "no":**
Germany.	South Africa
Armenia	Myanmar
	Colombia
	Iran
	Nepal

Question 3. How do you think traceability will help to achieve holistic sustainable chemicals management in your country?

Country	Participant's responses
GERMANY (NGO)	- Traceability helps the invisible hand of the market. - Consumers could prefer "cleaner" products and push their further development (if the price-differences are not too big, of course). - It works probably only in the sense of "system thinking" (only in that case the whole value chain can be called sustainable). - So, sustainable chemicals management is necessary.
IRAN (Academia)	- Although new information for me, it seems a very important issue for chemicals management.

Poll 6 Results (N=5)

What kind of tools do you think are needed to implement and improve traceability in your country?

More information, registration, and monitoring systems (n=2)

- **South Africa**: "More information from importers; databases that are accessible to the public; training customs officials on aspects of traceability."
- **South Africa**: "Better registration and monitoring systems."

Adapt global tools (n=3)

- **Armenia**: "Good approach would be to try and adapt the existing global tools including online tools, software for tracking, mapping; would be also good to have a kind of platform where stakeholders across the supply chain could interact – Armenia."
- "Suggestion- an international, official app, made by UNEP for example that shows the ingredients of the product and the substances used in the process. companies get a label for cooperating with the app."
- "Traceability is a challenging topic in Colombia because the market is very atomized and the end of the chain are looking mainly for prices and in this approach, no environmental issues drive the market."

Poll 7 Results (N=2)

What is your opinion on sustainable chemicals management leading to overall environmental sustainability performance in the supply chain?

- "A difficult question is given that no country has yet achieved true sustainable chemicals management and so we are unable to assess the wider impact."
- "It works only in the sense of "system thinking" (only in that case the whole value chain can be called sustainable). So sustainable chemicals management is necessary. Sustainability should be understood broadly (incl labour)."

Useful resources:

- **Global Chemicals Outlook Tool I**
  https://www.unep.org/resources/report/global-chemicals-outlook-ii-legacies-innovative-solutions
- **WHO (2016): Preventing disease through healthy environments**
  https://www.who.int/quantifying_ehimpacts/publications/preventing-disease/en/
- **UN General Assembly A/HRC/33/41 (2016): Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and waste** https://undocs.org/A/HRC/33/41
- **EU Database on Substances of Concern in Products**
  https://echa.europa.eu/scip

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 questions 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