Introduce yourself (name, job title, organization and country) in the chat section.

Only the presenter and facilitator will speak. Any comments or questions from attendees should be typed in the chat section.

Please kindly keep you microphone muted and cameras off during the discussion.

NOTE:
If you are having technical issues, please join the Chemicals in Products WhatsApp group, using this link, and we will assist you:
https://chat.whatsapp.com/DVwGix7x04d1Q9b5usaJcr

Discussion 4:

Topic: Chemicals Management toolkit: Is chemical risk management too complex for a “do-it-yourself” guidance?”

Date: 29TH September 2022

- Time: 14:00 – 15:30 (GMT+2)
- Presenter: Antonia Reihlen, freelance consultant, chemicals expert.
  Valérie Frison, Junior Policy Analyst, OECD.
- Facilitator: Maxine Brassell, University of Cape Town
Chemicals in Products
Community of Practice

Discussion 4 in 2022

Chemicals Management Toolkit: Is chemical risk management too complex for a “do-it-yourself” guidance?

PRESENTERS

Antonia Reihlen
Freelance consultant,
Chemicals expert

Valérie Frison
Junior Policy Analyst, Environment Health and Safety division,
OECD
Stop playing with chemicals!
How to avoid hazardous chemicals in toys
(Part 1 – Overall approach)

Antonia Reihlen, Germany
Overview

- Background and challenges
- Approach of the toolkit
- Topics addressed by the toolkit
Background

• Toys are one focal area in the Chemicals in Products Programme

• Support to “the” toys supply chain to better manage chemicals and thereby avoid
  • Incompliance with chemicals (in product) legislation
  • Health threats to children
  • Environmental pollution

• Focus on plastics
Challenges

- Global scope → different (legal and cultural) context(s)
- Supply chain → many types of actors / roles
- Differing capacities
  - Knowledge and skills
  - Financial and human resources
  - "Power to act" in the supply chain

Source: pixabay.com
Approach

• Chemicals (risk) management system
  • Backbone of the toolkit
  • Continuous not a one-off task

• Modular approach
  • 1 Module per chemicals (risk) management task
  • Interlinked but self-standing
  • Each module is an entry point to the system

• Tiered, e.g. “simple” → “advanced”; legal compliance defines the basis

• Different elements, e.g. guidance/explanation, examples, tools, links etc.
Chemicals risk management system (internal)

- Core: Identification of chemicals of concern and where they are used
- Prioritisation
- Identification of (best) option(s) to act
- Implementation
Chemicals risk management system (external)

- Obtaining information from suppliers
- Identification of customer needs / demands
- Getting help from others
Guiding principles for the toolkit

- Be as specific as possible and as generic as needed (e.g. legislation)
- Be role-specific where needed
- Keep it short and simple
- Focus on the basics
- Give examples
- Integrate existing tools and guidance, where possible
Chemicals in the focus of the toolkit – Chemicals of concern

• General understanding: Chemicals that could cause harm to humans and the environment

• Implemented in the toolkit – 3 levels of ambition:
  • Basic / minimum level
    Regulated in international conventions (lists) and / or
    Regulated in regional/national legislation (regional/national lists or certain classification(s))
  • Medium level
    (Proven) properties of concern, such as CMR (“official” classification)
  • Highest ambition
    Emerging properties of concern, such as vPvB or EDC
Question 1:

What do you consider the core challenges of making a guidance / a chemicals management toolkit useful for company practitioners and what do you suggest to overcome them?

This question will be discussed for 20 minutes.

Please use chat only, mute your microphone, and turn your video off.

Thank you!

NOTE:
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What are the aims and principles of the toolkit you consider most important (three can be ticked)?

10: To raise awareness on chemicals of concern in toys
9: To raise awareness on chemicals' risk management using a systematic and continuous approach
6: To ensure that the toolbox is sufficient to solve most of the specific problems a user might encounter
3: To create an understanding of the needs and value of the supply chain

4: To be a unique entry point to tools and guidance from other sources
2: To explain basics rather than try to be complete and cover too many cases
7: To offer a modular approach so that users can access it from different angles and perspectives
0: Other (Please specify in the chat)
What are the most urgent support needs of actors in the supply chain (Word – cloud)

- education - how to use it
- raising awareness
- to attract attention
- consumer satisfaction
- tax free
- free
- multiple language
- ghs
- instructions
- financial muscle
- research
- easy to use
- legal assistance
- collaboration
- human resources training
- making it easy to adopt
- incentives policy or fina
- country specific language
- simple to understand
- hazard and risk awareness
- user friendly
- expects training
Stop playing with chemicals!
How to avoid hazardous chemicals in toys
(Part 2 – Content of the Toolkit)

Antonia Reihlen, Germany
Content

- Overview of the toolkit sections (Modules)
- Overview of elements of each module
- Example of the section on legislation
Toolkit Sections

1. **Background**
   - Why chemicals are important
   - The GHS and chemical hazards
   - Plastics (in) toys

2. **Legislation**
   - Identify requirements on chemicals in your products
   - Check if you want to go beyond legislation

3. **Supplier communication**
   - Get information on chemicals in your raw materials

4. **Chemicals Inventory**
   - How to build, maintain and use a chemicals inventory

5. **Take action**
   - Prioritise chemicals for action
   - Discuss options with suppliers and customers
   - Assess alternatives
   - Substitute if possible

6. **Inform customers**
   - Provide information on chemical compliance
   - Answer customer questions
   - Promote healthier and more environmentally friendly products

**Explanation of terms**
Look up terms that you do not understand
Elements of the toolkit sections

- Guidance document = backbone
  - Often with flow-chart
  - Links within the module

- Tools as part of the module and external links

- Examples illustrate practices in guidance

- “Going beyond” for more ambitious approaches

<table>
<thead>
<tr>
<th>Element</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guidance documents</td>
<td>Brief and basic explanation of an issue giving an overview and orientation on what to consider</td>
</tr>
<tr>
<td>Training materials (slides)</td>
<td>Slides you can use to train your staff, your customers, or your suppliers. The slides usually summarise and illustrate the content of the guidance</td>
</tr>
<tr>
<td>Checklists and flow-charts</td>
<td>Checklists and flow-charts help you to step-by-step assess an issue and find out what you can do (next). They may be linked to other elements of the toolkit to help you using them</td>
</tr>
<tr>
<td>Implementation tools</td>
<td>Tools that you can implement in your work routines, e.g. a chemicals inventory template</td>
</tr>
<tr>
<td>Link lists</td>
<td>Here you find links to resources that either provide further information or could be used as (additional) tools.</td>
</tr>
<tr>
<td>Examples</td>
<td>Specific cases illustrate how the toolkit can be applied in practice.</td>
</tr>
<tr>
<td>Flyers ‘Going beyond’</td>
<td>Information on what can be done beyond legal compliance and/or to ensure staying up to date on chemicals</td>
</tr>
</tbody>
</table>
2 Legislation

This section helps you to identify regulatory requirements for chemicals in your toy product, depending on where the toy is placed on the market.

2.1 Guidance: How to find legislation on toys

2.2 Example: Identifying chemicals-related requirements for placing a toy on the US market

2.3 Link list: Legislation around the globe

2.4 Guidance: Staying up to date with legislation

2.5 Going beyond: Benefits and arguments for being more ambitious than regulatory compliance
Example: Section 2 - Legislation

Identification of the role → what legislation is relevant?

Are you a manufacturer / formulator / compounder of plastic raw materials / pellets for use in toys manufacturing?
- Yes: Check chemicals legislation in addition to toys legislation (2.1.1)
- No

Do you produce a product for use in toys or a finished toy?
- Yes
- No

Are you an assembler of toys from individual parts?
- Yes
- No

You may not be the target audience for this chart

Importers and retailers will be added (not focus of the toolkit but relevant regarding communication)
Example: Section 2 - Legislation

Identification of the relevant legislation
Finding relevant legislation

- Make a list of countries to which you export your product
- Going beyond (optional): Consider benefits and arguments for being more ambitious than regulatory compliance (2.5)
- Do your products have different composition if you export to different countries?
  - Yes
  - No
- Identify potentially relevant legislation (2.1.2)
- Check legislation of all relevant countries individually
Example: Section 2 - Legislation

Identification of the relevant legislation
Finding relevant legislation

This list will give you further information on chemicals-related legislation in some of the most relevant toy-importing countries. It will guide you to websites, where you can find easy explanations on the legislation in the target country and provide original legal texts.

International Conventions

The **Stockholm Convention** bans the production and use of chemicals that are considered as persistent organic pollutants. Its Annexes are continuously updated and new chemicals included.

The **Montreal Protocol on Substances that Deplete the Ozone Layer** bans and regulates the disposal of substances that deplete the ozone layer. Substances covered by the Convention should normally NOT be contained in toys.

The **Minamata Convention** bans the use of mercury. Mercury is unlikely to be contained in toys, unless these contain electronic components and/or any types of sensors.

The Rotterdam Convention lists in its Annex III Chemicals that should not be used in toys (note that only the chemicals indicated as ‘industrial’ may be contained in toys)

Legislation on chemicals

**Various legal requirements on chemicals in the European Union:**
The European Chemicals Agency (ECHA) provides a database containing information (in English) on the regulatory status of a chemical in the EU. Simply enter the CAS number or name of the substance here: [EUCLEF](https://echa.europa.eu). Please note that the information in EUCLEF does not cover all EU legislation, yet.

**Various legal requirements on chemicals in the United States**
The US Environmental Protection Agency (US EPA) provides a database containing information (in English) on the regulatory status of a chemical in the US. Simply enter the CAS number or name of the substance here: [System of Registries](https://www.epa.gov).
Example: Section 2 - Legislation

Definition of toys
Understanding what is required

Read the definition of what is a toy and check if your product falls under the definition and/or is used in a toy (2.1.3)

Product is (meant for use in) a toy as defined in legislation?

Yes

No requirements under which other legal requirement?

No

Identify the chemicals-related requirements (2.1.1)

2.1.3 Check the definition

Usually, the definition of a toy should be at the beginning of the legislation (often under a "definition" section) or at the start of explanatory websites. If the definition applies to your product, you must fulfil the requirements.

If you provide an input material to toy-manufacturing companies (e.g., a plastic compound), your material must comply with these requirements as well. Check with your sales department if any of your customers manufacture toys. Some customers may have specific requirements for your materials that stem from the need to comply with toy legislation.
Example: Section 2 - Legislation

Definition of toys
Understanding what is required

- Read the definition of what is a toy and check if your product falls under the definition and/or is used in a toy (2.1.3)
- Product is (meant for use in) a toy as defined in legislation? No → No requirements under toys legislation, check which other legal requirements are applicable
  Yes → Identify the chemicals-related requirements (2.1.4)

List of TYPES of requirements and explanation
- Bans
- Concentration limits
- Migration limits
- Labelling requirements
- Testing requirements
- ...

BEF GROUP
Example: Section 2 - Legislation

Definition of toys
Understanding what is required

Table 1: Overview

<table>
<thead>
<tr>
<th>Country of export</th>
<th>Example: Europe</th>
<th>Country of export 1</th>
<th>Country of export 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicable legislation (name the legislation document)</td>
<td>Toy safety Directive Standards EN 71</td>
<td>Toy safety Directive Standards on CEN website (CEN/TC 52)</td>
<td></td>
</tr>
<tr>
<td>Link to legislation</td>
<td>Toy safety Directive Standards on CEN website (CEN/TC 52)</td>
<td>Directorate General Grow</td>
<td></td>
</tr>
<tr>
<td>Date last checked</td>
<td>01.12.2021</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Responsible institution</td>
<td>Directorate General Grow</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Next check</td>
<td>01.12.2022</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Example: Section 2 - Legislation

Definition of toys
Understanding what is required

2.1.6 How to get help if you have questions

Legal requirements and requirements in standards may be worded in a complicated manner or have a lot of exceptions. Therefore, it is not always easy to understand what requirements apply to a product. If you are unsure that you correctly understand the requirements, there are several options for getting further support:

Resources

- Contact trade associations in your country; many of them have staff that are responsible for helping companies export to other countries in questions of legislation or customs.
- Consult an organization which is experienced in the toys market and legislation of your target country, e.g. for the EU the Chamber of commerce (https://www.eurochambres.eu/)
- Ask your industry association if they can support you in interpreting legal requirements or direct you to a relevant person, e.g. the International Council of Toys Industries (https://toy-icti.org/ICTI/about/members/ICTI/about/national-members.aspx)
- Legal advisors, commercial lawyers in the area of trade law could also be good contact points for getting help. However, their advice is usually expensive.
- If you are a polymer (pellet) producer or compounder, you may also contact your customer to ask if there are any (new) requirements to fulfil.
Question 2:

What type of guidance in terms of content and form is useful for (all) members of the toys supply chain?

This question will be discussed for 20 minutes. Please use chat only, mute your microphone, and turn your video off.

Thank you!

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What sections of the toolkit do you consider most important? Please rank (1 highest, 6 lowest importance)

<table>
<thead>
<tr>
<th>Rank</th>
<th>Section</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st</td>
<td>Legislation</td>
</tr>
<tr>
<td>2nd</td>
<td>Background and classification</td>
</tr>
<tr>
<td>3rd</td>
<td>Communication with suppliers</td>
</tr>
<tr>
<td>4th</td>
<td>Taking inventory of chemicals</td>
</tr>
<tr>
<td>5th</td>
<td>Substitution</td>
</tr>
<tr>
<td>6th</td>
<td>Customer communication</td>
</tr>
</tbody>
</table>
How do you think the use of the toolkit can be best promoted/incentivised? (Word cloud)
IOMC TOOLBOX

FOR DECISION MAKING IN CHEMICALS MANAGEMENT
The Challenge

- IOMC Participating Organizations have developed hundreds of tools and guidance documents that are relevant for countries in their efforts to implement SAICM

- However, finding the most appropriate tool or guidance document to address specific national issues can be a challenge
The Solution

- The internet-based IOMC Toolbox enables countries to **identify the most relevant and efficient national chemicals management actions**

- The Toolbox **takes into account the resources available** and guides users towards **cost-effective solutions** adapted to the country

- At each implementation step, the Toolbox **presents the relevant IOMC resources, guidance documents, and training material**, all available online and free of charge
IOMC Toolbox
For decision making in chemicals management
IOMC Toolbox for Decision Making in Chemicals Management

About IOMC Toolbox

The IOMC Internet-based Toolbox for Decision Making in Chemicals Management (IOMC Toolbox) is aimed at countries who wish to address specific national issues regarding chemicals management.

The toolbox identifies the available IOMC resources that will help the country address the identified national problems or objectives. Special focus is given to identifying simple cost effective
IOMC Toolbox scope

**Chemical Accident Prevention, Preparedness and Response**
This management scheme helps to protect the health of workers and the public, as well as the environment and property, by reducing the likelihood that accidents will occur and limiting the consequences if one does happen.

**Classification and Labelling System Scheme**
The GHS addresses the classification of chemicals by types of hazard and proposes harmonized hazard communication elements, including labels and safety data sheets.

**Industrial Chemicals Management Scheme**
This scheme strengthens the capabilities of countries in assessing risks associated with industrial chemicals throughout their lifecycle and managing them safely.

**National management scheme for PRTRs**
A PRTR is a publicly accessible database or inventory of chemicals or pollutants released to air, water, and soil and transferred off-site for treatment. It brings together information about which chemicals are being released, where, how much, and by whom.

**National Management Scheme for Pesticides**
Controlled use of pesticides can be used helps to avoid adverse effects on human health and the environment. This scheme covers the pesticide lifecycle, from production to registration, distribution, use, and disposal.

**Occupational Health and Safety Management Scheme for Chemicals**
Improving occupational health and safety prevents or reduces the incidence of chemically induced illnesses and injuries at work and consequently enhances the protection of the general public and environment.

**Public Health Management of Chemicals and WHO Chemicals Road Map**
Tools and information organized by topics of major relevance are provided for public health, environmental health, and medical aspects of assessing and managing chemical risks and impacts of chemicals. Tools are also organized by action areas of the Chemicals Road Map.

**Best Available Techniques**
The Best Available Techniques (BAT) and similar concepts constitute essential elements for setting emission limit values and other permit conditions for industrial emissions in many countries around the world.
IOMC Toolbox: 6 Toolkits

- FAO Pesticide Registration Toolkit
- OECD Environmental Risk Assessment Toolkit - Cloned
- UNIDO Chemical Leasing Toolkit
- UNIDO Innovative Approaches for the Sound Management of Chemicals and Chemical Waste Toolkit
- UNIDO Green Chemistry Toolkit
- WHO Human Health Risk Assessment Toolkit: Chemical Hazards

The toolkit provides materials to deepen the understanding of Green Chemistry, including origins, technologies and how it drives environmental and economic goals for societal benefits. The toolkit aims to transform the trainees into Green Chemistry facilitators who will be able to disseminate Green Chemistry to their networks by using practical and tangible examples that encourage the change. It was developed under the Global Green Chemistry Initiative—a project led by UNIDO in partnership with the Center for Green Chemistry and Green Engineering at Yale University.

The project is implemented by IOMC and The European Union.
IOMC Toolbox: capacity building activities

Save the date

Wed 23 of October

National training workshop - Colombia - Industrial Chemicals

11:00 AM

The project is implemented by IOMC

The project is funded by The European Union
IOMC Toolbox: capacity building activities

- Promotion of and training on the Toolbox
- Tailored Capacity Building events using the Toolbox:
  - National and regional workshops on pesticides, industrial chemicals, health aspects...
  - Webinars on management systems, technical topics, flagship tools or toolkits.
- Request webinars or workshop to valerie.frison@oecd.org
www.iomctoolbox.org
THANK YOU
Question 3:

How can the IOMC Toolbox help set-up or improve your chemicals’ management system in a cost-effective way?

This question will be discussed for 20 minutes. Please use chat only, mute your microphone, and turn your video off. Thank you!

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What are the biggest hurdles you face in your country/organisation in setting up or improving your chemicals’ management?

- Finding information on chemical hazards: 8
- Finding information on legislation: 4
- Cooperation between the stakeholders: 9
- Compliance and enforcement: 10
- Financing the management system: 9
- Public awareness: 7
- Other (Please specify in the chat): 0
What other topics would you like to see in the IOMC Toolbox?

- Exposure evaluation
- National management
- National management
- Stakeholder engagement
- Occupational Safety Standards on use of chemicals in workplaces
- Sustainable Chemistry, Circularity/Circular Economy, Recycling, design for Recycling, LCA
- If possible about pesticide regulations in developing countries.
- Implementing green chemistry, applying circular economy principles to chemicals chain supply
- Alternatives to dangerous pesticides especially banned ones
What other topics would you like to see in the IOMC Toolbox?

They are very important topics to address chemical issues.
THANK YOU
for attending the
Chemicals in Products
CoP
Discussion 4

SAVE THE DATE:
CiP CoP Discussion 5
Date: 10th November 2022
Topic: “Chemical’s regulation enforcement”

All resources and summaries of previous CiP CoP discussions are available at the following link:
https://saicmknowledge.org/topic/community-practice

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).
How will you use the information shared at today's discussion?

- share in the team
- Through our network
- It will be shared with colleagues at work who are interested in this area
- I will use this important information to better my activities
- inform those interested