



Challenges companies face regarding needs of information on chemicals

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ChemSec

*Informal Workshop on Stakeholders' Information Needs on
Chemicals in Articles/Products
9-12 February, 2009 Geneva, Switzerland*



ChemSec

The International Chemical Secretariat

- i) A coalition of environmental organisations**
- ii) serves as a forum for parties working for better chemical control**
- iii) monitors the development of Chemical policies in Europe and elsewhere**
- iv) seeks to strengthen support for progressive legislation, in particular among business actors**





NGO Advisory Committee

	 European Unit	
		 European Policy Office



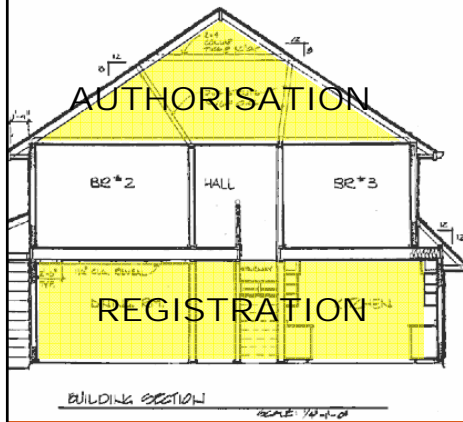
ChemSec's Business group

Established in 2003 with members such as:

- **Dell**
- **Boots the Chemist**
- **B&Q**
- **Sara Lee**
- **Skanska**
- **Sony Ericsson**
- **L'Oreal**
- **Eureau**



Building a new regulation in EU... REACH



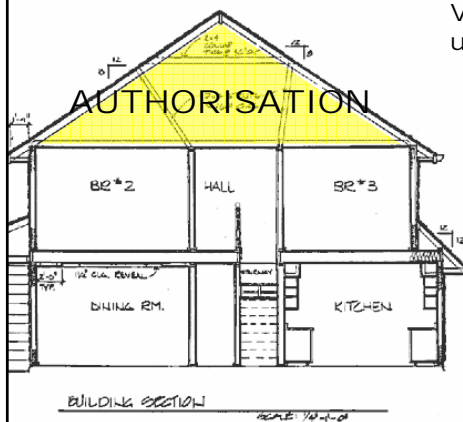
REACH regulates and gathers information on the chemicals on the market.

Substances of "very high concern" only allowed under authorisation

All substances > 1 t/a to be tested, information submitted to the European Chemicals Agency
"No data - No market"



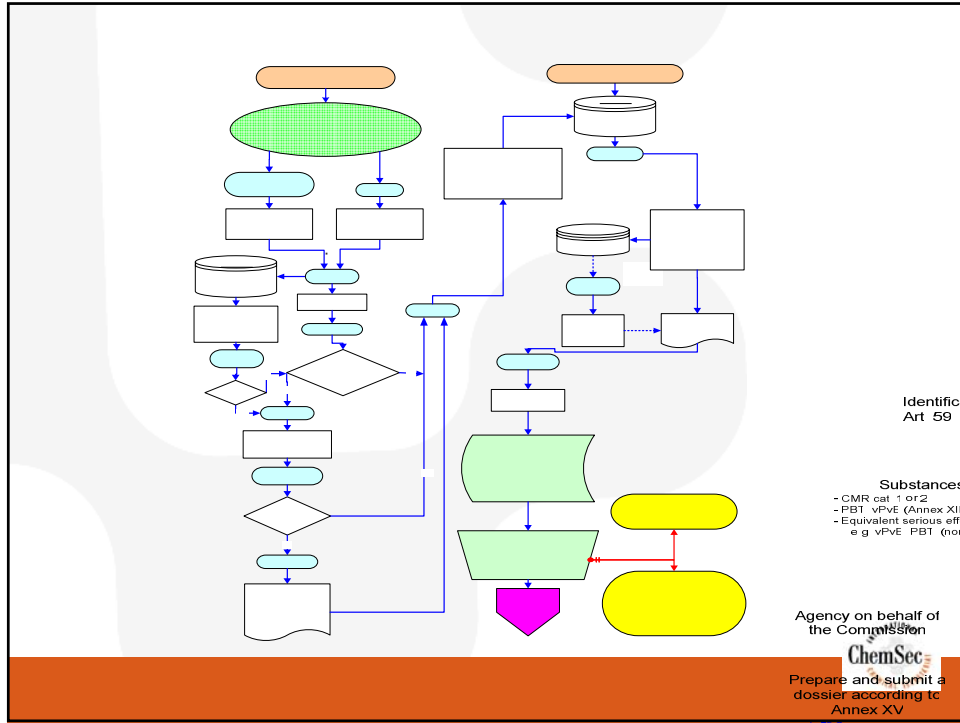
AUTHORISATION



Production/Use of Substances of Very High Concern only allowed under Authorisation

Carcinogenic
Mutagenic
Toxic to reproduction
Persistent, Bioacc. & Toxic (PBT)
Very Persistent & very Bioaccumulative (vPvB)
Endocrine disrupters
"Substances of equivalent concern"





Authorisation
(Substance identification and es)

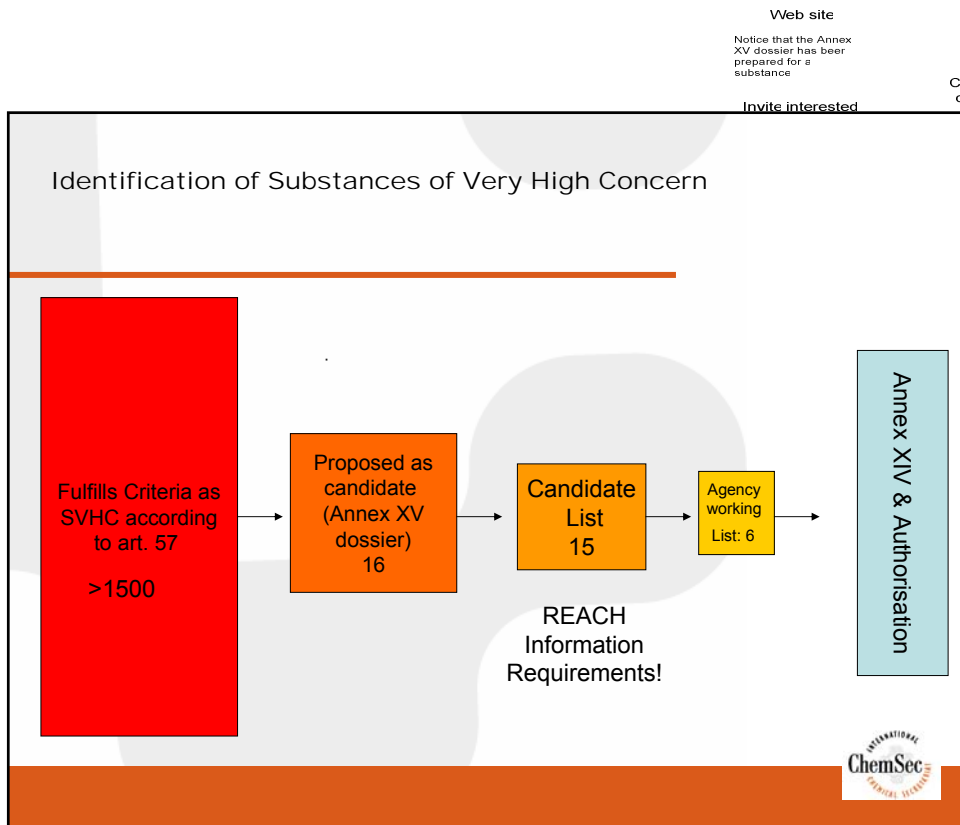
MS CA

Prepare and submit a dossier according to Annex XV

art 59.3

Establish candidate inclusion indicating s the Agency

art 56 + anc



Web site

Notice that the Annex XV dossier has been prepared for a substance

Agency

Circulate for comments

Agency

Invite interested

MS CAs

Comments by any MS or Agency? T <T+ 6td art 59.5

nc

yes

Use

- as
- in
- for
- on
- acc
- at

Use

- as
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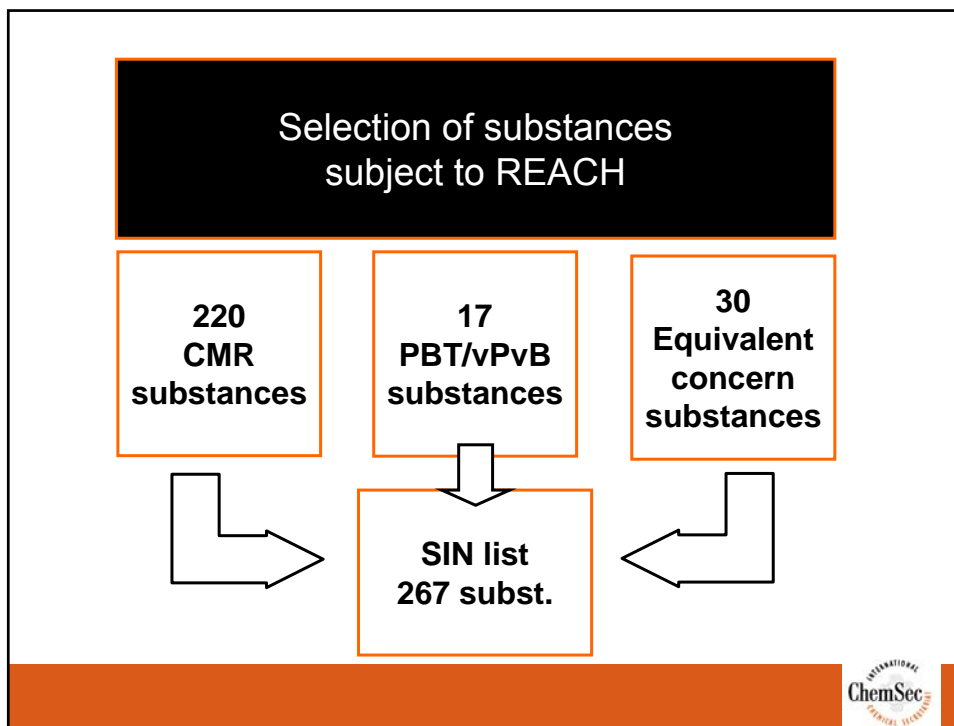


Preparation of the REACH SIN List



— **NGO Advisory
Group**

— **Business
Reference Group**



The Objective

**To identify chemicals that meet the
REACH criteria for SVHC**

- ...to assist Candidate List process
- ...to prioritize chemicals for phaseout
- ...to offer guidance to companies,
consumers, regulators
- ...to promote safer alternatives

INTERNATIONAL
ChemSec
CHEMICAL SECURITY



ChemSec's Business group feedback: Why is this information on chemicals in products required?

- **Regulation/compliance**
- **Brand-name/consumer demands**
- **Waste management**
- **Workers protection**
- **Investor interest**
 - The Investor Environmental Health Network, encouraging TUR policies, eg through shareholder resolutions: www.iehn.org
- **Damage control/avoidance!**



SKANSKA

Why we do it

- Experience is Sweden
 - many widely available building materials not fully "legal"
- We use "materials" not "chemicals"
 - "blends" not "molecules"
- We use "brands" not "chemicals"
 - serious cross-border issue
- Rising energy efficiency requirements leading to more air-tight buildings
 - indoor climate critical => must avoid toxics

Therefore we have to proactively.....

Protect our workforce

- Technically illiterate when it comes to chemicals
=> Short-term exposure may create long-term harm

Protect the public

- Buildings typically last many decades
=> Long-term public exposure risk – encourage clients to “future-proof”

Protect ecosystems

Challenges in retrieving information from suppliers

- **What info to request?**
 - *If you don't know what chemicals are in a material, how do you know what to even look for?*
- **Cooperation/Compliance**
 - *“Sometimes they don't want to tell” what their products contain*
- **Chemicals used in processes**
 - *Do you ask the relevant questions?*
- **What criteria used?**
 - Agreement on relevant criteria?
 - Does supplier understand criteria?

Challenges in retrieving information from suppliers

Cooperation/Compliance

- “Sometimes they don’t want to tell” what their products contain
- Really don’t have the data
- Don’t understand what company is asking for
- It’s not their level of transparency
- It may be a trade secret, an issue of intellectual property
- Don’t think hazard data is complete/relevant

Solutions found/developed to increase the flow of information in the supply-chain.

Introducing a system in a sketchy landscape - Each actor inventing their own wheel?

- Lists, lists, lists!
 - Dependent on external sources for chemicals safety info
 - Constant monitoring by Safety, Environmental, & Regulatory Affairs Department (in-house experts)
- Informing/educating the supply chain about needs and criteria used, eg through workshops, asking the right questions etc.
- Aligning requirements, eg BASTA, AFIRM, REACH, SIN?
- Regulation?
- Require full disclosure as Sony Ericsson



One Way forward: The BASTA System

Skanska Sweden was involved in the creation of the BASTA system, along with others in the Swedish construction industry.

Objective: develop an industry standard for building products and a system to support phase-out of dangerous substances.



One Way forward: The BASTA System

- **Based on intrinsic properties**
- **Register of products, not chemicals**
- **Suppliers registers products satisfying system requirements**

Result

- **The supplier has full knowledge of the chemical content of its products**
- **The supplier has certified that the content of its products have none of the BASTA-specified dangerous properties**



One Way forward: The BASTA System

Problem: Limited to Sweden (Scandinavia) whereas these construction companies have a large range of *international* suppliers.

Efforts now to broaden BASTA.

Serve as a model for other industries, e.g. textiles?

www.bastaonline.se

Needs to achieve increased flow of information in the supply-chain.

- *Gradual understanding of “new responsibility for chemicals safety and the safety of consumers”.*
- *Needed mentality change within companies, industry maturation.*
- *Realization of “what chemicals management actually is and make it part of the way they do business”*
- Early information on alternative, sustainable products
- Harmonisation of requirements, criteria
- Regulation must foresee upstream compliance

What we need from others

Suppliers

- Clear and easy to understand information
- Proactive information on alternative "green" products

Producers

- Acceleration of "green" product development/availability

Politicians

- Harmonise information – address the "brand" issue
- Recognise that "materials" and "chemicals" are different
- Less dependency on scientific measurement to set limits



Thank you!

www.chemsec.org

