

IPEN presentation at UNEP CiP side event

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- 1. Please outline briefly the advantages, priorities and needs for your organization or stakeholder group with respect to the proposed recommendations and activities on chemicals in products information exchange.**

Advantages:

Lack of information about chemicals in products has become an issue of global concern. IPEN considers knowledge and information about chemicals in products to be fundamental to risk reduction and the sound management of chemicals throughout the life cycle of products. Information exchange on chemicals in products accommodates the right to know principal and thus should be transparent, available, accessible, user friendly, adequate and appropriate to the needs of all stakeholders. Industry becomes more responsible for what is being produced and manufactured.

Our priorities and needs:

IPEN participated in the development of the proposed draft recommendations and we agree with the need to develop an international framework suggested in the recommendations that would facilitate the provision, availability and access to information on chemicals in products. However, two things should be secured: first that the harmonization should not lead to a downgrading of existing standards for human health and the environment, and secondly the framework should stimulate the development of national legislation in developing countries and countries with economies in transition.

Participation of all stakeholders, including health and environmental NGOs and other civil society groups should be ensured in the development of this guiding document.

I would like to emphasize that information systems on CiP can be effective in improving products and reducing risks from branded products. But, one challenge is the informal markets that have a huge presence in developing countries and countries with economies in transition and may not be adequately addressed through the CiP systems, thus posing a significant challenge.

A large number of products in the market are not adequately labeled or not labeled at all. Most articles are sold with insufficient or even no information on their chemical ingredients. Almost no products include basic information regarding manufacturers or environmental and health impacts throughout the whole life-cycle. Due to this lack of transparency, consumers can not make informed choices. Moreover, populations vulnerable to CiP include children and pregnant women, as well as workers who are exposed to toxic chemicals that cause environmental degradation and therefore bear an unacceptable burden of disease and suffering.

CiP information systems should provide consumers with the information they are looking for, information which is clear, credible, up-to-date, and comparable, that helps people to make

informed decisions about the products that they purchase, use or dispose of. Only such information will make consumers become a driving force for creating markets for cleaner products.

More information about chemicals in products would lead to cleaner processes, both upstream and downstream in the supply chain that can benefit consumers, workers and environment. This is especially true for developing countries and economies in transition which face rapid development of the production, use, recycling and disposal processes. However, the development and enforcement of the national legislation in these countries are far from being sufficient to adequately protect people's health and the environment.

We believe that any CiP system should consider substitutions and alternatives; a pilot project should consider how substitutions and alternatives can be incentivized; any CiP system pilot study should consider chemicals throughout a product's entire life cycle including impacts on workers during manufacturing and end of life.

- 2. What challenges and opportunities do you foresee within your organization or stakeholder group in developing global chemicals in products information exchange, and what might be the first steps in this development? Please recall that the CiP project recommendations propose to define the principles of chemicals in products information exchange, and not create an information exchange system, per se**

The first step in global chemicals in products information exchange is the development of the framework elements which should be broadened to facilitate consumer awareness along with the development of guidelines for recycling and disposal and extended producer responsibility. However, the biggest challenge is that the industry is not willing to share information on chemicals in products due to information disclosure reasons, competition risk, etc. The opportunity to overcome this challenge is to start a dialogue between stakeholders.

The second step is to conduct broad international consumer awareness-raising campaign to increase understanding of the issue of chemicals in products thus raising the demand for cleaner products and create a driving force for safer products. The challenge is that so far the situation in developing countries and economies in transition is that consumers are driven by economic reasons rather than by their knowledge and interest in cleaner products.

Low awareness on chemicals in products information results in the fact that recalled products are sent to developing countries where there is minimum or no control. A story with baby bottles containing bisphenol A is a good example of how products recalled in developed countries appeared on the shelves in developing and transition economies. BPA is blamed for causing developmental problems in children from baby bottles and other beverage containers.

Non-governmental organizations can play an important role in raising consumer awareness on what chemicals are in products, and what impacts they may have on human health and the environment. Again I would return to the story with BPA containing baby bottles. Campaign against BPA in baby bottles was initiated by NGOs which started a broad awareness raising on BPA threat to the health of children. Market responded by taking baby bottles from the shelves of the most popular supermarkets. Later regulators in Canada and the EU banned BPA in baby bottles.

- 3. The current CiP project recommendations propose to promote best practices in chemicals in products information exchange. What measures would you foresee as necessary within your stakeholder group to both define and then to facilitate the widespread uptake of best practices?**

We believe that for better information exchange a clearinghouse could be established to facilitate access to, for example already existing collated lists of recalled products and databases of aggregated information on chemicals in products.

The development of appropriate awareness-raising objectives along with technical requirements for new information exchange methods including best policy practices and best technical practices is needed.

- **Guidance on product labeling could be developed as well as information guidelines for environmentally sound recycling and disposal.**
- **Guidelines for Extended Producer Responsibility (EPR) and other national regulatory policies are needed**
- **Guidelines for reporting the chemical content of products**

All of these measures would benefit from public participation in their design and implementation to insure relevance and effectiveness in broadly reaching consumers.