The Chemicals in Products project:
Textiles sector case study – findings to date

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Presentation

Objectives
Methodology
Existing systems
Lessons learned
Needs and gaps
Potential opportunities
Textile Case Study objectives

Contribute to the CiP project objectives:

- **CiP**: “Collect and review existing information on information systems pertaining to chemicals in products including but not limited to regulations, standards and industry practices;”
- **Case study**: Review positive list and negative list initiatives

- **CiP / case study**: “Assess that information in relation to the needs of all relevant stakeholders and identify gaps;”
- **CiP**: “Develop specific recommendations for actions to promote implementation of the Strategic Approach with regard to such information, incorporating identified priorities and access and delivery mechanisms;”
- **Case study**: Identifies areas with high potential for effective collaboration on CiP exchange, suggests avenues to investigate.

Case study methodology

Builds upon earlier CiP project work

- CiP Needs Survey and report
- Project global report – Kogg / Thidell

Literature and web research

Targeted interviews (22 to date)

- Footwear and clothing brand names, Ecolabel institutes, manufacturers, upstream suppliers, governments, NGOs
- Developed and developing countries
Existing system types

- **Negative list systems** - “information on chemicals that are not in the products”
  - Current systems provide a significant step in building technical and communication infrastructures

- **CiP information systems** – “some or all information on the chemical composition of a product”
  - Systems can / are providing stakeholders with additional data → a more informed decision is possible
  - Contributes to the SAICM goal of information and knowledge (OPS Paragraph 15(b))

Existing CiP information exchange

- **Negative list systems**
  - Restricted Substance Lists (RSLs)
    - most widespread effort found in the sector
    - many major brands require these
    - similar but company specific
    - respond (at a minimum) to legal requirements in target markets
    - current systems have provided a significant step in building technical and communication infrastructures
  - Ecolabels
    - Study concentrates on Type 1 or 3 ecolabels (third-party verification)

- **CiP information systems**
  - Some are expansions upon above programs
  - Most complete systems are found within the manufacturing chain
Lessons from existing systems

- **Restricted substance lists**
  - Motivated by numerous factors, including legislative requirements, brand name image and protection, corporate attitude
  - Complexity of materials flows in manufacturing
    - complexity in managing chemicals information flow
    - requires a substantive and rigorous methodology (clear responsibilities for suppliers, independent testing of product components)
    - brand name companies heavily involved in capacity building and program tracking / oversight
  - Extensive communications networks have been built around RSLs
  - Companies have much knowledge about what is not in their products
  - Marketing benefits from RSL efforts are almost non-existent

Lessons from existing systems (cont.)

- **Ecolabels**
  - Many labels in use already (70+ deal with textiles)
  - Frequently national or regionally oriented
  - Many are multi-sectoral and / or cover multiple aspects of production (e.g. environmental impact, working conditions, sustainability, social responsibility)
  - Chemical safety is a common theme
  - Verification of data / claims varies widely
Lessons from existing systems (cont.)

- **Positive list efforts**
  - Some have grown out of RSL initiatives
  - Similar structure and function to negative list efforts
  - Confidentiality of data is a key concern
    - Solutions found:
      - restrict data access within receiving company
      - work with suppliers to identify data that could be released with the product
  - Little or no attempts at marketing benefits from chemicals data directly
  - Information sometimes included in a more holistic approach (e.g. Environmental Product Declaration, life-cycle analysis and product rating, proprietary label)

Needs and uses of information

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<thead>
<tr>
<th>Stakeholder</th>
<th>Negative list information</th>
<th>CIP information</th>
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<tbody>
<tr>
<td>Manufacturers/Brand names / distributors</td>
<td>Legal compliance</td>
<td>Informed decisions</td>
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<td></td>
<td>Brand protection</td>
<td>Improved product safety</td>
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<td>Extended producer responsibility</td>
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<td>Assess environmental performance</td>
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<td>Better avoidance of risks</td>
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<td>Respond to inquiries</td>
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<td>Governments</td>
<td>Monitor compliance</td>
<td>Response measures (to incidents and inquiries)</td>
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<td>Policy development</td>
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<td>Proactive measures</td>
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<td>Public interest NGOs/Academia</td>
<td>Promote avoidance of hazardous substances</td>
<td>Facilitate to identify science-based emerging chemicals issues</td>
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<td>Facilitate promotion of best practices</td>
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<tr>
<td>Consumers</td>
<td>Avoid health and environmental risks</td>
<td>Proper use and care</td>
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<td>Recyclers/End of life handlers</td>
<td>Legal compliance (for reuse)</td>
<td>To identify proper precautions, avenues or techniques for handling or disposal</td>
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Bridging gaps

Possibilities to build on existing efforts to expand information exchange?:

- RSL initiatives
  - Promoting the further expansion of RSL efforts would bring a large measure of awareness to the manufacturing chain actors involved
  - Use existing capacity and communication infrastructures to begin communicating positive list types of data
  - Sharing RSL program test results could make available valuable chemicals information to governments, NGOs (issues: cost, CBI, format)
- Ecolabels
  - Similar opportunities as above

Bridging gaps (cont.)

Possibilities to build on existing efforts to expand information exchange?:

- Positive list initiatives
  - Take lessons learned from existing systems (e.g. on CBI)
  - Promotion of a standard (e.g. the Environmental Product Declaration Standard, ISO 14025)
  - As with the RSLs, look to expand recipients of test data generated under the positive list programs
Bridging gaps (cont.)

Starting a new CiP exchange effort

- Definition of the drivers
  - Legal
  - Responding to specific demands
  - Corporate policy
  - Potential market advantage

- Parameters
  - Chemicals reported
  - Recipients and format
  - Exchange platform, access and security, CBI, etc.