The Chemicals in Products project: Textiles sector case study

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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 project**: “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 current and developing legislation and activities related to chemicals in products information exchange for textiles

- **CiP project / case study**: “Assess that information in relation to the needs of all relevant stakeholders and identify gaps;”
- **CiP project**: “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 information exchange, suggests avenues to investigate.

Case study methodology

Builds upon earlier CiP project work
- CiP Needs Survey and report
- Project global report – Kogg / Thidell

Concentrated on consumer textiles (e.g. clothing, footwear, household textiles)

Literature and web research

Targeted interviews (22) and inquiries
- Footwear and clothing brand names, Ecolabel institutes, manufacturers, upstream suppliers, governments, NGOs, waste handlers
- Developed and developing countries
Existing system types

- **Negative list systems - information on chemicals that are not in the products**
  - Restricted Substance Lists (RSLs)
  - Eco-labels

- **Other information systems – some or all information on the chemicals in a product**
  - Environmental Product Declarations (EPDs)
  - Full / partial content disclosure

Existing CiP information exchange

- **Negative list systems**
  - Restricted Substance Lists (RSLs)
    A list of substances which must be absent or below a specified concentration in the final product
    - RSLs are the most widespread chemical content control effort found in the textiles sector
    - many major brands require these
    - similar but usually company specific
    - chemicals addressed: respond (at a minimum) to legal requirements in target markets
    - motivated by numerous factors, including brand name image and protection, corporate approach to CiP / environmental issues
Existing CiP information exchange

- **Ecolabels**
  - Many labels in use already (70+ deal with textiles)
  - Frequently national or regionally oriented
  - Chemical safety is a common theme
  - Many are multi-sectoral and/or cover multiple aspects of production (e.g., environmental impact, working conditions, sustainability, social responsibility)
  - Verification of data/claims varies widely
  - Study concentrates on Type 1 (third-party verification)

- **Positive list efforts (information on what *is* in a product)**
  - Some have grown out of RSL initiatives
  - Similar structure and function to negative list efforts

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Textiles materials flow diagram

> Source: “Chemicals in Products” – project report for the CiP project, Kogg and Thidell
Lessons from existing systems

- **Restricted substance lists**
  - Complexity of materials flows in manufacturing:
    - complexity in managing chemicals information flow
    - requires a substantive and rigorous means to reliably monitor chemicals and to communicate the results (e.g. 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
  - Through the use of RSLs many companies have more knowledge about chemicals used in the sector
  - Marketing benefits from RSL efforts are almost non-existent

- **Eco-labels (i.e. OekoTex Standard 100)**
  - Similar lessons as with RSL, except that the label is viewed as a marketing advantage

Lessons from existing systems (cont.)

- **Positive list efforts (information on what is in a product)**
  - Some have grown out of RSL initiatives
  - Similar structure and communication 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 presentation mechanism (e.g. Environmental Product Declaration, life-cycle analysis and product rating, proprietary label)
**Needs and uses of information**

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

**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 for Type 1 labels (i.e. those with independent verification)
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)
  - 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.