
The Chemicals in Products project: Textiles sector case study

**Workshop of the Chemicals in Products Project
March 16, 2011
Geneva, Switzerland**

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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
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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
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Existing CiP information exchange



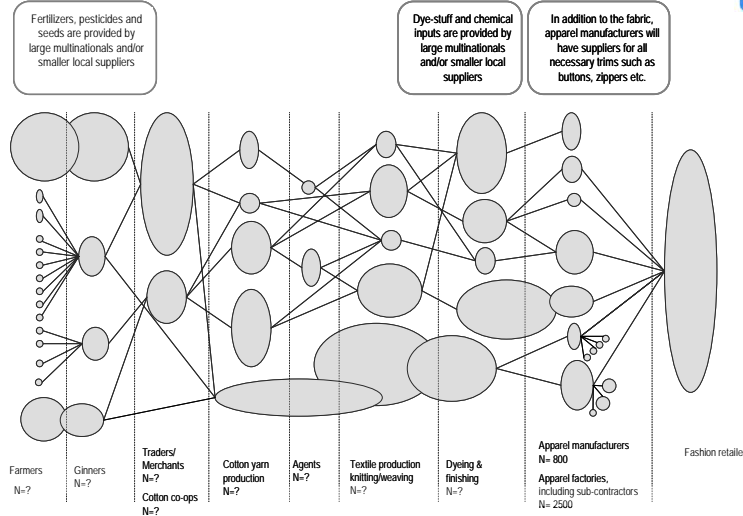
■ Ecolabels

- 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

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 (exchange selected CiP information, retain confidentiality)
 - 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



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

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
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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.
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