



Survey of SAICM Focal Points on the Need for Information on Chemicals in Products

Monica Becker
Monica Becker & Associates Sustainability Consultants

Scoping Meeting for the Study of Stakeholder Needs for Information on Chemicals in Products



United Nations Environment Program
Geneva, Switzerland
December 17-18, 2009



Project Background



- In May, 2009 ICCM2 adopted a resolution agreeing to implement a project on Chemicals in Products (CIP) with the objective of promoting the implementation of paragraph 15 (b) of the Overarching Policy Strategy of SAICM
- UNEP invited to lead the project, along with a Steering Group
- Project to undertake the following tasks:
 1. Collect and review existing information on information systems pertaining to CIP, including regulations, standards and industry practices;
 2. Assess that information in relation to the needs of all relevant stakeholders and identify gaps; and
 3. Develop specific recommendations for actions to promote implementation of SAICM with regard to such information, incorporating identified priorities and access and delivery mechanisms.
- UNEP will report to the SAICM Open-Ended Working Group (mid 2011) and to ICCM3 (mid 2012).





Objectives of the Survey Project

- To collect views from SAICM stakeholders on:
 1. Priorities for information on specific product groups or sectors; and
 2. The need for information by various stakeholders at different points in the lifecycle of a product
- To document existing/developing information systems
- To provide this information to this Scoping Meeting
- To inform the next phase of the CiP Project



Survey

- Survey questionnaire was developed by the UNEP, CiP Project Steering Group
- E-mailed on 9 October to SAICM Focal Points
- Deadline for submitting the survey was 16 November
- Some recipients of the survey passed it along to other relevant organizations.

Email Distribution of Survey

Category	Number
Regional Focal Points	5
National Focal Points	168
NGO Focal Points	61
Industry Groups	7
Others	54
IGO Focal Points	13
Steering Group Members	10
Other Organizations	1





Survey Structure – 3 Main Sections

Section 1: Product/sector priorities for an information system on chemicals in products

Section 2: Types of information needed

Section 3. Existing & developing CIP information systems

Product or sector (Select a maximum of 4)	Priority			
	1 (low)	2	3	4 (high)
Children products including toys				
Clothing & apparel (including shoes, leather & textiles)				
Computers, cellular phones and other electronic goods				
Electrical goods and household appliances				



Survey Response

- 43 surveys were included in this study
- 73 individuals; 60 distinct government agencies, NGOs and IGOs

	Africa	Asia-Pacific	Central & Eastern Europe	Latin America & Caribbean	Western Europe and Other	Int'l	Total
Gov	3	2	7	2	6		20
NGO	5	7	2	2	4	2	22
IGO						1	1
Total	8	9	9	4	10	3	43

- 14 additional completed surveys were returned to UNEP, available at: <http://www.chem.unep.ch/unep/psaicm/cip/infooncip/default.htm>





Section 1: Product/sector priorities for an information system on chemicals in products

Respondents were asked to:

- Choose up to four product groups that are a priority for their country/stakeholder group vis-à-vis CiP information needs
- Rank these according to priority:
1= lowest priority and 4= highest priority
- Explain why selected products groups are a priority
- A list of 11 product/sector groups provided, plus option to write in and rank "other" product categories



Section 1: Product/sector priorities for an information system on chemicals in products

22 Product/Sector Categories Tracked in the Survey

11 Categories Included in the Survey

Children's products including toys
 Clothing & apparel (including shoes, leather & textiles)
 Computers, cellular phones and other electronic goods
 Electrical goods and household appliances
 Batteries
 Construction materials
 Furniture and bedding
 Food containers and food packaging
 Motorized vehicles (personal automobiles, buses and trains, airplanes, boats, etc.)
 Paper and printed materials
 Non-food packaging

11 Categories Written in as "Other"

Chemicals in health care products (e.g., mercury)
 Carpets
 Cosmetics/Personal care products (for adults & children)
 Recycled plastics
 Foodstuffs
 Industrial Chemicals
 Agriculture Materials/Chemicals
 PVC houses
 PCB-containing transformers, capacitors
 Plastic molded products
 Paints (lead/ mercury/ tin containing)





Table 3. Tabulation of Responses to Section 1 Question on Product or Sector Priorities, Ranked by All Respondents (Partial Results - Top 8 Categories)

Product or Sector	Percent of Respondents Selecting Product/Sector as Top 4 Priority							
	All Respondents	Regions					Sectors	
		Africa	Asia-Pacific	Central & Eastern Europe	Latin America & Caribbean	Western Europe and Other	Gov	NGOs
N =	43	8	9	9	4	10	20	22
Children's products including toys	77%	63%	89%	89%	100%	60%	90%	55%
Food containers and food packaging	53%	38%	89%	67%	50%	40%	65%	45%
Computers, cellular phones and other electronic goods	47%	88%	44%	56%	25%	20%	55%	36%
Construction materials	37%	13%	44%	56%	25%	40%	40%	32%
Clothing & apparel (including shoes, leather & textiles)	33%	50%	22%	11%	50%	50%	55%	23%
Electrical goods and household appliances	30%	13%	33%	22%	50%	40%	25%	27%
Batteries	28%	63%	22%	33%	25%	0%	20%	32%
Cosmetics/ personal care products (for adults & children)*	16%	13%	11%	0%	25%	40%	15%	18%

* Product/sector categories filled in by respondents under "other"



Table 4. Product/Sector Priorities, All Respondents (Partial Results – Top 8 Categories)

Product or Sector	Percent that Selected Prod/Sector				Percent Selected Prod/Sector as Top 4
	1 (low)	2	3	4 (high)	
Children's products including toys	9%	16%	12%	40%	77%
Food containers and food packaging	21%	12%	9%	12%	53%
Computers, cellular phones and other electronic goods	7%	16%	16%	7%	47%
Construction materials	7%	7%	21%	2%	37%
Clothing & apparel (including shoes, leather & textiles)	14%	9%	9%	0%	33%
Electrical goods and household appliances	12%	12%	2%	5%	30%
Batteries	5%	9%	9%	5%	28%
Cosmetics/personal care products (for adults & children)*	2%	0%	5%	9%	16%

* Product/sector categories filled in by respondents under "other"



Reasons Given for Selection of Product/Sector Priorities

Children's Products, Including Toys:

- Vulnerability of children to chemical exposures and health impacts
- Increased consumption of toys
- Prevalence of imported toys with unknown material composition
- Use of toxic metals in toys
- Lack of information on hazards of toys
- Ineffective regulation on toy safety
- Possibility of recalled toys being sent to developing countries where there is little control
- Likelihood of recycled plastics in toys with often unknown content of hazardous substances (such as brominated flame-retardants)



Reasons Given for Selection of Product/Sector Priorities



Food Containers and Food Packaging:

- Impact on human health
- Lack of awareness and understanding on the part of consumers about the presence of hazardous chemicals
- Poor disposal practices, including open burning





Reasons Given for Selection of Product/Sector Priorities



Computers, Cellular Phones and Other Electronic Goods:

Africa and Asia:

- e-waste is growing, managed in an unsound way, causing contamination of heavy metals and other toxic pollutants, harming human health (consumers, workers in repair, recycling/waste handling) and the environment
- Consumers are unaware of the presence of hazardous chemicals in these products

Africa:

- Importation of used products because they are cheap. Many small scale companies repair cellular phones and computers without knowing the danger.
- Many products/articles are imported into the country at their end of use which later pose a threat in disposal and recycling
- Rise in domestic use of electronic products, fast turn-over

Other Regions:

- Chemical information too scarce to allow proper health and environmental protection
- Lack of information flow down the supply chain to recyclers/waste handlers
- Specific CoCs mentioned include: heavy metals, penta-BDE (foamed polyurethane), octa-BDE (computer monitor) and deca-BDE (cases of TV sets), PFOS



Reasons Given for Selection of Product/Sector Priorities



Cosmetics and Personal Care Products (for Adults & Children):

- Direct contact with skin
- Particularly important concern for vulnerable populations: pregnant women, fetuses, children
- Little is known about the chemicals in these products and the risks to human health. Need more evidence about effects and risk of exposure
- Cosmetics are widely used by women and they contain chemicals that have serious health hazards
- In Africa, Mercuric cosmetics are still on the market and are used as skin lighteners.
- Average woman in the U.S. uses 12 personal care products/day, resulting in more than 150 unique chemical exposures.
- Research indicates that CoCs – including carcinogens, reproductive toxicants, neurotoxicants, immune system toxicants and endocrine disruptors – are commonly found, resulting in repeated exposures



Section 2: Type of Information Needed

Respondents were asked to write in:

- *What type of information is needed?*
- *Who would need this information?*
- *Explain the need/use of the information.*

Responses on *type of information* were coded to enable analysis of the data

Information Categories	Specify what type of information is needed (several are possible per category)	Who would need this information? (several are possible per information type)	Explain the stakeholder's need / use of the information (e.g. for hazard information or to enable informed decision making)
Manufacturing related information (e.g. manufacturers name; date, location)			



Type of Information Needed

Table 6. Summary of Coded Responses to the Question in Section 2: Type of Information Needed (Partial Data)

Code	Description	N=	Percent of Respondents that Listed Information Type		
			All Respond.	Gov	NGO
	Manufacturing Related Information				
1	Manufacturer name and contact information		81%	100%	64%
2	Manufacturing date, batch number		60%	65%	59%
3	Place of manufacture, country of origin		51%	70%	32%
	Chemicals Related Information				
10	Potential hazards of chemicals in products (health and environment)		70%	80%	59%
9	Identification of chemicals in products		67%	75%	59%
11	Quantities of chemicals in products		40%	45%	32%
8	Identification of hazardous chemicals in products		26%	30%	23%
	Supply Chain Information				
13	Contact information for suppliers		58%	70%	45%
14	Contact information for importers, distributors, retailers, storage facilities		23%	35%	9%
	Use & Handling of Products				
15	Precautions, information on safe use and storage of products, what to do in case of accident/exposure/injury.		81%	95%	68%
16	Effects of product ingredients/product on health and the environment, labeling of products - similar to GHS		35%	45%	23%
	End-of-product-life related information				
20	Information on <u>how</u> to safely dispose of products/type of waste		74%	85%	64%
18	Safe waste handling information		63%	85%	41%
19	Recycling, remanufacturing, reuse information		58%	65%	50%

UNEP Scoping Meeting for the Study of Stakeholder Needs for Information on Chemicals in Products

Who Needs Information?

<u>Supply Chain & End-Users</u>	<u>Government</u>
Manufacturers	Regulators
Manufacturing workers	Congress
Suppliers	Commerce ministries
Designers	Health ministries
Product quality inspectors	Environmental ministries
Importers	Consumer protection agencies
Exporters	Trade inspectors & customs services
Distributors	Emergency personnel
Retailers/Shopkeepers	Community Councils
Consumers & consumer organizations	Testing authorities
Industrial & professional users of products	Inspectors
<u>End-of-Life</u>	<u>General</u>
Dismantlers	General public
Recycling industry	NGOs of human rights, health, environment
Waste managers	Researchers
Waste collectors	Analysts
Take-back agencies	Students
Waste disposal workers	Environmental experts
Waste treatment facilities	Certification bodies



UNEP Monica Becker & Associates Sustainability Consultants

UNEP Scoping Meeting for the Study of Stakeholder Needs for Information on Chemicals in Products

Why is CiP Information Needed?: Summary of Survey Responses

Needed for Health and Environmental Protection, to:

- ✓ Ensure safe handling of products during manufacturing, transport, storage, sale, use, repairs and disposal at end of product life
- ✓ Protect stakeholders: manufacturing workers, retailers, consumers (especially children), waste handlers, recyclers, etc.
- ✓ Respond to emergencies
- ✓ Assist affected patients
- ✓ Work with affected communities

Needed for Assessment of Hazard and Risk

- ✓ For environmental and health risk assessment
- ✓ To provide information for analysis of potential exposure pathways/scenarios

UNEP Monica Becker & Associates Sustainability Consultants



Why is CiP Information Needed?: Summary of Survey Responses (cont.)

Needed for Public Awareness & Advocacy, to:

- ✓ Support advocacy work
- ✓ Raise awareness about chemicals in products, education
- ✓ Force manufactures to stop production of hazardous products and stop using hazardous chemicals in production processes
- ✓ Encourage manufacturers to switch to safer alternatives
- ✓ Make product claims and complaints
- ✓ Be able to provide information to stakeholders in local languages

Needed by Product Designers, Manufacturers, Retailers, Importers to:

- ✓ Design and manufacture materials, components and products that are safer
- ✓ Communicate efficiently about chemical safety issues
- ✓ Improve production methods/omit hazardous substances
- ✓ Pass CiP information on in the supply chain
- ✓ Enable retailers to know what they are selling/to inform buying decisions
- ✓ Enable importers to know what they are importing/to inform decisions



Why is CiP Information Needed?: Summary of Survey Responses (cont.)

Needed by Governments to:

- ✓ Strengthen legislation, regulation, e.g., restriction of chemical use
- ✓ Ensure environmentally sound management and disposal of waste
- ✓ Ensure and implement Extended Producer Responsibility (EPR)
- ✓ Prepare permits
- ✓ Assign responsibility for negative impacts to product manufacturers
- ✓ Comply with international rules for chemicals in products, e.g., Stockholm Convention
- ✓ Ensure that POPs from recycled materials are not continued to be used in new products
- ✓ Address the import of products from countries that do not regulate the use of POPs, phthalates, lead in products such as clothing, furnishings, toys, etc.
- ✓ Provide commerce & customs services with point of contact for product information and for monitoring of illegal import/export (contact info. for manufacturer's, distributors, importers)
- ✓ Conduct market surveillance/product monitoring and tracking; ensuring product is genuine and not adulterated; product recalls (specific to contact info. for manufacturer's, distributors, importers by government and others)
- ✓ Provide data for analytical reports (gov and others), including for analysis of product reuse and recovery, and CoCs entering country through supply chain (gov and others)





Section 3: Current CiP Information System Involvement and Activities

Respondents were asked to provide data on *existing* or *developing* information systems on CiP

Results: Over 55 information systems were reported by survey respondents

(Additional systems described in: *Toxic Substances in Articles: The Need for Information*: <http://www.norden.org/pub/sk/showpub.asp?pubnr=2008:596>)

An assessment of existing systems is ongoing within the CiP project, including this meeting, to include an analysis of existing systems against stakeholder needs for CiP information



Government Systems: Examples from the Survey

CiP Systems:

- Malta Standards Authority Database – contains information on pesticides and cosmetic products: Name of product, person responsible, contents
- Croatian Institute for Public Health's Safety Data Sheet Register - compiles data for substances or products that are included in Safety Data Sheets
- EU's RAPEX System – quick warning and information system that provides information about dangerous consumer products of a non-food nature, containing: Name of the product, company mark, producer, origin country, characteristic of hazards related to the products, approved measures, country that entered the product into the system.
- Belarus CIP System – collects information on products that are required to receive certification and have been investigated. Tracks data from laboratory analysis of chemicals in products, name of manufacturer and importer, type of product, date of analysis and reasons for prohibition (if prohibited).

Chemical Information Systems:

- Russia's Register of Potentially Hazardous Chemical & Biological Substances
- Kyrgyzstan's National Register of Potentially Toxic Chemicals
- Tanzania's Database of Industrial & Consumer Chemicals (under development)





Industry Systems

Type 1. Systems that facilitate information exchange between manufactures and suppliers, and in some cases customers and recyclers

- Proprietary systems that track data on substances present in materials, components and/or products
- Indicate whether those substances are subject to any legal requirements in the countries where products are manufactured, sold, discarded or recycled.
- Ensure compliance with regulations addressing chemicals in products, which can vary from country to country.
- In some cases used to provide information to consumers and recyclers.
- Could serve as models for CiP info. systems and/or important "feeder" systems to a publicly-accessible system. CiP system might be made compatible with industry systems.

Examples:

- [Joint Industry Guide: Material Composition Declaration for Electrotechnical Products](#)
- [International Material Data System \(IMDS\)](#) - formed to comply with the European Directive for Automobiles

Type 2. Restricted substances lists, include:

Example: [Apparel & Footwear Restricted Substances List \(RSL\)](#)

Type 3. Product certification systems

Example: [EPEAT](#) (*Environmental Products Environmental Assessment Tool*)



NGO Systems

Systems to make CiP information, publicly available and accessible to all stakeholders. Examples from survey:

Database of Consumer Products Containing Dangerous Chemicals -

Arnika Association, Czech Republik

- Created to inform Czech consumers about products on the market that contain dangerous chemicals -- toys, cosmetics, shoes, textiles, household products, school supplies
- Currently includes: Product name, picture, type of product, manufacturer, importer, chemical hazards, and date of first notification. Arnika conducts product testing and updates the database with the results.

Skin Deep, - Environmental Working Group, U. S.

- Publicly accessible, searchable database of chemicals in personal care products
- To enable public to assess toxicity of products and identify safer products
- Ingredient information from product labels is analyzed against government and academic databases of chemical hazards.





Attributes of CiP Systems: Things to Consider Going Forward

1. What is the purpose of the system? Examples:
 - To inform decision making by the general public (consumers, retailers, manufacturers, government, recyclers, waste handlers, etc.)
 - For a government agency to track CoC in products
 - For Business-to-Business information exchange (e.g., proprietary chemical disclosure along a supply chain)
2. What type of information does the system provide? For example:
 - CiP information, e.g., types of information identified in the survey (e.g., manufacturer name & location; chemical ingredients, quantities, hazards, exposure potential, etc.)
 - Chemical information, e.g., hazardous properties of chemicals; chemical uses
3. Who developed or “owns” the system? Government, NGO, industry, 3rd party
4. Is it mandatory or voluntary?
5. Is data publicly accessible or proprietary? A hybrid system?
6. What products/sectors are included?
7. How is information delivered, e.g., on-line database, product label, SDS?
8. Other attributes?



Making use of the survey data in the Scoping Meeting

1. Priorities for information on specific product groups or sectors;
2. Types of information needed by various stakeholders and why this information is needed
3. Existing information systems or systems under development that can begin to:
 - a) Provide insight on the important characteristics of systems;
 - b) May serve as models for a harmonized system;
 - c) May be “feeder” systems to provide data to a harmonized system





Scoping Meeting for the Study of Stakeholder Needs for Information on Chemicals in Products

Thank you.



www.monicaecker.com



Monica Becker & Associates Sustainability Consultants