Strengthening action on chemicals in the toy sector

Virtual Expert Group
15 July 2020, 1 pm – 3:30 pm CEST
United Nations Environment Programme
Brief Summary

Background

The virtual expert group meeting, organized by the Chemicals and Health Branch of the United Nations Environment Programme (UNEP), gathered key experts of the toy value chain, with the goal of further understanding chemicals of concern and identifying potential action points for shifting to alternatives. It provided an opportunity for the Chemicals and Health Branch to consult with key experts, to review and complement sector-specific information and to explore the next steps within the project while addressing the issue of chemical of concern at the international level. The virtual meeting was attended by 24 persons. The list of participants is provided as an annex.

Different presentations were made during the first part of the workshop. They included a presentation on the preliminary results of research on chemicals of concern in toys and initial mapping of chemicals-related toy safety policies in low- and medium-income countries, a presentation on chemicals-related toy safety policies in China and introduction of newly developed approaches for risk screening and alternatives assessment for chemicals in toys based on the USEtox consensus model. All the presentations and document shared by the participants during the meeting will be shortly made available on the UN OwnCloud.

During the second part of the workshop, participants were invited to share their ideas and experiences. The discussion was centered around two axes: i) discussion and clarification on the initial results of the research presented and ii) reflections on the challenges, needs, and opportunities arising from chemical management in the toy sector.

Summary of the main ideas discussed during the virtual meeting

Challenges/needs

The main challenges and needs related to chemicals of concern and related compliance, in the toys sector, put forward by participants evolved around the following:

- **Lack of awareness results in compliance issues along the supply chain**. The suppliers of raw materials are often not aware of their material's end-use and may, therefore, be unaware and unable to connect with specific compliance and legislation requirements (such as toys requirements). Related needs include a control of chemicals safety at very early stages of the supply chains (e.g., in the form of a screening of raw materials) in order to support conformity at the stage of the final product. Information sharing along the supply chain to raise-awareness on chemicals properties and compliance requirements could be improved thereof;
- **Increased recycling and circularity may pose a challenge with regard to unintended contaminants in plastic toys**. Recycled plastic can be input material for toys, which can lead to unintended contaminants being present in such toys. Recycling is often done by small and medium-sized enterprises (SMEs). If these SMEs do not comply with international standards, associated with lack of transparency in the supply chain, it creates a possibility for non-desirable contaminants in toys. Therefore there is a need for targeted actions related to recyclers and plasticizers. However the difficulty to reach out to these fragmented stakeholder groups, including for governments, was acknowledged. The role of large brands or retailers may be explored, while recognizing that testing bears a cost.
- **Low barriers to enter the toy market.** Compliance issues are often found when new players, usually small traders, are entering the market. They are either not aware of the requirements in place or do not want to comply with them. Awareness raising and stricter enforcement of regulation would be needed, focusing on these smaller stakeholders, which do not follow a self-certification scheme, as large brands are doing.
- **Extending regulatory enforcement to E-commerce operations.** Small factories are increasingly using online platforms, which often includes directly shipping their products to customers through postal mail. Extending the enforcement of existing regulations to these new and less established export channels is challenging, and stakeholders may escape scrutiny by authorities of export countries, such as China, and customs authorities in importing countries regarding compliance assessment. These "free-riders" could also be looked at to ensure enforcement of the regulation. For example, in the EU, during the summer of 2021, E-commerce will be regulated as ordinary commerce. Market surveillance authorities will be able to survey and control all toys product entering the European Union.

Opportunities

The following opportunities for collaborative actions were shared, as initial ideas, in response to the above challenges and needs.

- Development of **training and information sharing** for small stakeholders, especially at the beginning of the supply chain, on regulatory requirements and health and environmental impacts of certain chemicals that are possibly present in toys; This would help shift the focus of chemicals-

related regulatory compliance towards the stage of material inputs and not only end-product -, as well as support information sharing taking place early in the supply chain.

- Development of **guidance and sharing of good practices, in implementation** of toys regulations in countries, including customs training and laboratory trainings.
- Raising awareness/involvement of relevant stakeholders **to ensure regulatory compliance when toys are sold through E-commerce;**
  Development of a scheme similar to the one developed by the textile sector, for chemicals in the toy sector could be beneficial to the toy industry(Initial scoping could explore the ideas undertaken by the Zero Discharge of Hazardous Chemicals (ZDHC) programme) ; and enhance **labelling** related to chemicals in toys.
- **Showcase involvement of high-ambition stakeholders** in the toy sector and progress related to sustainability, during the fifth International Conference on Chemicals Management (ICCM 5).
- Continue the **discussion on material flow analysis** in plastic toys, with interested stakeholders (as per the project request).

Next steps

- UNEP will follow up with participants to explore further interest in engaging on above mentioned opportunities.
- UNEP will prioritize, according to interest and to resources available, the most relevant activities to be conducted, in the context of the project.
- For and beyond ICCM5, linkages with the Chemicals in Product Programme could be explored further.

List of participants

No	**Name**	**Organization**
1	Ms. Sandra Averous-Monnery	UNEP, Chemicals and Health Branch
2	Mr. Nicolo Aurissano	Technical University of Denmark
3	Mr. Chad Beddie	Canada
4	Mr. Ghislain Boucher	Canada
5	Mr. Alexander Breunig	Deutscher Verband der Spielwarenindustrie e.V
6	Mr. Ram Charitra Sah	Center for Public Health and Environmental Development
7	Ms. Jiang Chen	China
8	Ms. Delfina Cuglievan	SAICM Secretariat
9	Ms. Wenjia Fan	UNEP, Chemicals and Health Branch
10	Mr. Peter Fantke	Technical University of Denmark
11	Ms. Wan Fei	BCRC China
12	Ms. Elisa Gavazza	UL
13	Ms. Bettina Heller	UNEP, Resources and Markets Branch
14	Ms. Nanqing Jiang	China
15	Mr. Olivier Jolliet	University of Michigan
16	Mr. Alan P. Kaufman	Toy Industry Association, Inc
17	Ms. Brenda Koekkoek	SAICM Secretariat
18	Ms. Nicoline Lavanchy	UNEP, Chemicals and Health Branch
19	Mr. Llorenc Mila I Canals	UNEP, Resources and Markets Branch
20	Mr. Shaan Rashid	Canada
21	Ms. Amélie Ritscher	UNEP, Chemicals and Health Branch
22	Ms. Judith Torres	Uruguay
23	Mr. Juergen Vogelgesang	European Commission
24	Ms. Caili Zhang	China