

## Annex 1: Proposed CiP Programme information-sharing format



### SAICM Chemicals in Products Programme

#### Summary of Activities and Actions Towards Accessing, Exchanging and Using Information on Chemicals in Products

##### 1. Organization and Contact Information

Company/Organization Name and Address:	IPEN		
Telephone:	+46 31 799 9474	Email:	ipen@ipen.org
Website:	<a href="http://www.ipen.org">www.ipen.org</a>		
Product Sector(s):	Variety		

Contact person (#1):	Olga Speranskaya
Position/job title:	Co-Chair/CiP Programme manager
E-mail:	<a href="mailto:olga@ipen.org">olga@ipen.org</a>
Telephone:	+46 31 799 9474

Contact person (#2):	Bjorn Beeler
Position/job title:	International Coordinator
E-mail:	<a href="mailto:bjornbeeler@ipen.org">bjornbeeler@ipen.org</a>
Telephone:	+46 31 799 9474

## 2. Description of System(s) used to Access or Exchange Information on Chemicals in Products (CiP information)

### 1 Activities summary

Describe briefly the activities of the company/organization: In what product sectors does it operate? Through which product life cycle stages (for example, raw materials and feedstocks, formulations, manufacturing, transport, brands and retail, consumer/product use, waste handling, recycling)?

IPEN's product sectors include various lifecycle stages in a variety of consumer products such as:

- children's products
- personal care products
- textiles
- building materials
- electronics

### 2 Needs for CiP information

What drivers (e.g. regulatory, customer requirements, internal mandate, consumer demands, etc.) stimulated your organization's need to access and/or provide chemicals in product information?

There are three principle drivers: 1) The fundamental chemical safety principle of public right to know; 2) Public concern over the use of hazardous substances in products, including the recycling of toxic chemicals into new products; and 3) Need for stronger national regulations and market requirements in developing countries and countries with economy in transition.

IPEN needs to access chemicals in products information to:

- identify toxic substances in consumer products and assess against safer alternatives including non-chemical alternatives
- advocate for stronger national regulations and actions to provide safer products and reduce toxic chemical impacts throughout the lifecycle
- educate stakeholders on chemicals of concern, their presence in products and associated health and environmental effects
- urge industry to reduce and eliminate hazard in chemical design and manufacturing
- meet consumer demands for information to enable decision-making
- ensure that the CiP Programme objectives are well met and that "Information on chemicals relating to the health and safety of humans and the environment should not be regarded as confidential".

### 3 What CiP information system(s) do you use

If you utilize a system made available through others (i.e. through an association or a third party, such as a certification service provider) please identify the system and provide the web address.

If you use a CiP information system designed for your particular needs, please describe the main system characteristics and provide a web address or forward available literature.

IPEN uses a variety of systems for information and substitution including the following:

BizNGO Guide to Safer Chemicals [www.bizngo.org](http://www.bizngo.org)  
GoodGuide [www.goodguide.com](http://www.goodguide.com)  
SubSport Substitution Support Portal <http://www.subsport.eu/>  
Substitute It Now List <http://chemsec.org/business-tool/sin-list/>  
Danish Consumer Council <http://kemi.taenk.dk/> <http://kemi.taenk.dk/english>  
Rapid Alert System for dangerous non-food products (RAPEX)  
[ec.europa.eu/consumers/safety/rapex/index\\_en.htm](http://ec.europa.eu/consumers/safety/rapex/index_en.htm)  
Design for Environment [www2.epa.gov/saferchoice](http://www2.epa.gov/saferchoice)  
BASTA <http://www.bastaonline.se/searchpage-en/?lang=en>

In addition, as access to information is limited, IPEN also conducts product testing via internationally certified labs and techniques to assess, for example:

- banned or highly regulated flame retardants present in products, or recycled into new products (for example children's products and construction material such as carpet backing)
- toxic metals in children's products and personal care products

#### 4 Progress to date and uses of CiP information

Please summarize your progress to date in fulfilling your organization's CiP information needs (relating progress to the CiP Programme objectives<sup>2</sup> is encouraged).

What are the main uses of CiP information in your organization?

Since access to information is limited, progress has been slow in fulfilling CiP Programme Objectives. This is an area that requires greater industry responsibility and forward progress. IPEN has conducted some testing and monitoring of products after they have been produced and sold to the public. Summary results from some pilot projects are presented below.

Starting in the Philippines in August 2011, IPEN measured toxic metals in 435 children's products in Cebu, Davao and the metro Manila area in the Philippines. Approximately 29% of the products contained at least one toxic metal above levels of concern. The data revealed 67 products (15%) that contained lead at or above the US regulatory limit. Fifty-seven samples (13%) contained more than one toxic metal. The study also found children's toy cosmetics with mercury levels ranging from 4 – 77 times higher than the regulatory limit in the Philippines. The findings raise safety concerns for exposure in children and highlight the need for protective national regulatory policies. To our knowledge, this is the first publicly available investigation of toxic metals in children's products in the Philippines.

In December 2011, we expanded our examination to China. Due to the extensive production of toys and other consumer products, exposure to chemicals and metals from consumer products can take place throughout the lifecycle. These substances can cause concern for consumer exposure, particularly in children. This study, conducted by Greenpeace East Asia and IPEN, measured toxic metals in 500 children's products purchased in five Chinese cities: Beijing, Guangzhou, Hong Kong, Shanghai, and

---

<sup>2</sup>CiP Programme Objectives:

1. **Within supply chains, to know and exchange information** on chemicals in products, associated hazards and sound management practices
2. **To disclose** information of relevance to stakeholders outside the supply chain to enable informed decision-making and actions about chemicals in products
3. **To ensure** that, through due diligence, information is accurate, current and accessible

Wuhan. Overall, the data indicated that approximately one-third of the products contained at least one toxic metal above levels of concern. The data revealed 48 products (10%) that contained lead at or above the regulatory limit in China. Eighty-two products (16%) exceeded the 90 ppm regulatory limit for lead content in paint used in the US and Canada. Forty-six samples (9%) contained more than one toxic metal. Five children's products contained mercury at levels ranging from 39 – 78 times higher than the regulatory limit for mercury in cosmetics in China. The findings raise safety concerns for exposure in children due to extensive hand to mouth behavior and highlight the need for protective national regulatory policies. The high percentage of products with zero or low levels of metals (67%) indicates that elimination of metals in children's products is technically and economically feasible. To our knowledge, this is the first publicly available investigation of toxic metals in children's products in China.

In December 2012, IPEN conducted a study of children's products in six countries of Eastern Europe, Caucasus, and Central Asia (EECCA): Armenia, Belarus, Kazakhstan, Kyrgyzstan, Russia, and Ukraine. The study measured toxic metals in 569 children's products purchased at random from markets in Yerevan (Armenia); Minsk (Belarus); Almaty (Kazakhstan); Bishkek (Kyrgyzstan); Aprelevka, Kolomna, Moscow, Sochi, and Volgograd, (Russia); and Kiev (Ukraine). Measurements were performed using a hand-held X-ray fluorescence analyzer (XRF) and focused on lead, mercury, arsenic, antimony, cadmium, and chromium. Approximately 27% of the products contained at least one toxic metal of the six metals that were measured in the study and 13% contained more than two or more toxic metals, increasing the potential for harm. Ironically, children are often more protected from these metals in soil than they are in toys – even products often placed in the mouth. For example, when compared with the regulatory limits for these metals in soil in many EECCA countries, 104 products (18%) were greater than the limit for lead, 18 products (3%) exceeded the limit for mercury, 45 products (8%) were higher than the regulatory limit for arsenic, and 75 products (13%) were higher than the limit for antimony.

To continue elevating IPEN's capacity and engagement in the implementation of the CiP Programme, IPEN is conducting some small strategic pilot projects in 2017 – 2018 to address chemicals of concern in consumer products as defined in the CiP Programme along with national right to know policies and practices. Some progress has already been achieved. For example Mandatory Toxic Chemical Standard for Toys was enacted in Nepal in January 2017. Countries of the Eurasian Economic Commission, that includes Armenia, Belarus, Russia, Kazakhstan, and Kyrgyzstan, adopted a Technical Regulation on the Safety of Toys.

## **5 Challenges and lessons learned**

Please describe the challenges faced in the implementation and operation of the CiP information system and how they were met.

Also identify lessons learned, key factors for success and insights.

A key chemical safety principle agreed by governments is that health and safety information about chemicals should not be regarded as confidential business information. Overall, IPEN's goal is for health and safety information and the identity of chemicals in individual products to be publicly available throughout the entire product life-cycle, including during product manufacture, use, recycling and/or disposal. However the biggest challenge we face is that the private sector does not publicly disclose comprehensive information on chemicals in products – including chemicals of concern which have adverse effects such as mutagenicity and carcinogenicity and adverse effects on the reproductive, developmental, endocrine, immune and nervous systems. The lack of information applies to a variety of products including children's products and personal care products. Information on consumer product labels does not contain complete information about chemicals present in the product or proper

information about hazardous chemicals that are present. The industry does not typically provide comprehensive information on health effects and measures to reduce exposure.

There are other challenges faced in the implementation of the CiP Programme, including:

- Lack of a comprehensive, unified, open access, regularly updated on-line database to provide consumers with information about chemicals in products. To meet this challenge a model for this database could be used, for example EWG's Skin Deep database which lists 64,480 products (<http://www.ewg.org/skindeep/>).
- The credibility of the CiP Programme is under threat as the private sector participants in the CiP Steering Group have not yet publicly endorse the CiP Programme and have not yet become members. To meet this challenge and to maintain the credibility of the Programme, this should happen sooner than 2020, preferably in 2017.
- The work with product manufacturers has not been that active noting that often consumer products do not contain proper labels with information about product manufacturers, and manufacturers are not willing to disclose information about the chemicals they use. To meet this challenge it is important that more stakeholders inside and outside the supply chain join the CiP Programme and ensure its implementation.
- Countries lack the necessary legal, technical and administrative infrastructures to ensure that chemicals in products, throughout their life-cycles, are no longer a source of exposure and harm to human health and the environment. To meet this challenge strengthening/developing of the regulations and policies governing consumer product safety and information about chemicals in products is needed in developing countries and countries with economies in transition. This could include bans of specific substances, product labelling, and bans of products among others. This information should be made available on the UNEP website with a brief description of the regulation and/or policy.

To further meet these and other challenges IPEN continues raising public awareness on the hazards of chemicals, products and wastes and to promote precautionary action and informed choice. IPEN continues monitoring chemicals of concern<sup>3</sup> in consumer products in developing countries and countries with economies in transition and make the results publicly available. We will campaign for the full implementation of the Chemicals in Products Programme with actions on timely toxic alerts covering hazards in certain chemicals and products to meet consumer demands for information, to enable decision-making, as well as induce governments and industry to take action.

### **3. Share your practices on chemicals management using CiP information**

---

Please describe specific actions you take to manage chemicals based on the CiP information you obtain.

---

<sup>3</sup> Groups of chemicals that might be prioritized include persistent, bioaccumulative and toxic substances (PTS); very persistent and very bioaccumulative substances; chemicals that are carcinogens or mutagens or that adversely affect, inter alia, the reproductive, endocrine, immune or nervous systems; persistent organic pollutants (POPs), mercury and other chemicals of global concern; chemicals produced or used in high volumes; chemicals subject to wide dispersive uses; and other chemicals of concern at the national level. SAICM Overarching Policy Strategy para 9.

IPEN Participating Organizations (IPEN POs) have mainly worked on collecting new data on chemicals in consumer products, increasing awareness and advocating for policy development and changes for reducing health and environmental risks from chemicals in products.<sup>4</sup>

IPEN has developed a workplan for chemicals in products that proposes to do a series of small strategic pilot projects to contribute to the implementation of the CiP Programme in a number of product sectors that may include:

- children's products
- textiles
- building materials
- electronics
- others

Projects will include analysis of the available information on chemicals in products (labels, product datasheet, instructions for product use and disposal, etc.); collecting new data; and conducting outreach to public interest NGOs, community groups, local and national authorities, producers and retailers. This initiative has the potential to set up a model for CiP implementation by contributing to the development of national legislation; catalysing extended producer responsibility and other life-cycle policies; helping to fulfil consumer right to know; and further expanding IPEN's contribution to the implementation of SAICM Chemicals in Products Programme.

---

<sup>4</sup> <http://www.ipen.org/site/toxics-products-overview>