



April 2017

## Important pieces missing to safeguard toxic free material cycles!

**Information about chemicals in material flows must improve as we realize a circular economy. Substitute harmful chemicals and join the CiP!**

Dear representatives of producers, manufacturers and retailers,

Chemicals are indispensable to a healthy economy and welfare, but need to be managed properly throughout the life cycles of products. The EU is underway to realize ambitious plans for a circular economy<sup>1</sup>, making it even more important to address information gaps.

Hazardous chemicals must be prevented from entering the material flows. Otherwise it will not be possible to realize a safe circular economy, with non-toxic material cycles, in line with the 7<sup>th</sup> Environmental Action Plan<sup>2</sup> objective for a non-toxic environment. This requires access to information and additional listing of chemicals for legal restriction or bans, as well as proactive work by the industry, with innovations and substitutions, if possible with non-chemical alternatives. For manufacturers of goods, importers and retailers access to information on the chemical content in components bought from suppliers should be a high priority. Access to information of the chemical content in materials should be an absolute necessity for recyclers. As there are yet no legal requirements for information sharing in supply chains in the EU, individual companies need to take their responsibility. Some industries have already started building information sharing systems; others are lagging behind.

A few weeks ago, the Swedish Society for Nature Conservation released a report from a survey of consumer and company opinions on the chemical safety of products, chemical safety work and information sharing in companies, and chemicals legislation in 10 countries worldwide, carried out together with international partner organizations. The report<sup>3, 4</sup> clearly shows how concerned consumers are about the chemical safety of products. The European Environmental Bureau recently released a report, highlighting gaps in the EU chemicals, waste and products legislation that must be addressed to ensure that the necessary information on the chemical contents of all constituent components of products reaches the waste handling, recovery and recycling industries<sup>5</sup>.

<sup>1</sup> Closing the loop - An EU action plan for the Circular Economy ([http://ec.europa.eu/environment/circular-economy/index\\_en.htm](http://ec.europa.eu/environment/circular-economy/index_en.htm))

<sup>2</sup> EU 7<sup>th</sup> Environment Action Plan (<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D1386&from=EN>)

<sup>3</sup> Missing pieces – an international poll on consumer and company views on and concerns about chemical safety work ([http://www.naturskyddsforeningen.se/sites/default/files/dokument-media/missing\\_pieces\\_long.pdf](http://www.naturskyddsforeningen.se/sites/default/files/dokument-media/missing_pieces_long.pdf))

<sup>4</sup> Missing pieces, summary and condensed version ([http://www.naturskyddsforeningen.se/sites/default/files/dokument-media/missing\\_pieces\\_short\\_version.pdf?](http://www.naturskyddsforeningen.se/sites/default/files/dokument-media/missing_pieces_short_version.pdf?))

<sup>5</sup> Keeping it clean: How to protect the circular economy from hazardous substances (<http://www.eeb.org/index.cfm/library/keeping-it-clean-how-to-protect-the-circular-economy-from-hazardous-substances/>)



Therefore, we urge the trade federations to disseminate the following messages to their respective members:

- In the absence of a legally binding global framework on information sharing of the chemical contents in products, participate in the voluntary CiP Programme<sup>6</sup> on improved information about chemicals in products, which is to be implemented by industry. Besides being very important for closing the information gaps, better transparency can improve your public goodwill among buyers and consumers and give you market advantages.
- Create your own voluntary extended producer responsibility schemes, for collecting and recycling or reusing of your products. The advantage of this is that you should know exactly what chemicals you have in your products, thereby facilitating recycling and reusing in a safer way, and you could decrease your dependency on buying new raw materials.
- Whenever possible, substitute harmful chemicals in your products. Substitution work, although potentially initially costly, usually turns out to be beneficial in the longer run. To be proactive gives preparedness, so that you are not taken by surprise by legislative changes. The SIN list<sup>7</sup> is an excellent tool for selecting chemicals for substitution. As it is a shadow list to the official REACH Candidate list, based on the same selection criteria used for identifying substances of very high concern for the Candidate list, it can be used in anticipation of future legislative changes. If you need assistance with substitution work, ecolabel your products, if possible, using trustworthy third party certifications.
- Provide your customers with material and product safety data sheets, and if you are a producer of chemicals, with safety training. This is a corner stone in contributing to closing information gaps, and in good chemicals governance and product stewardship. Our poll, however, showed that not all companies have these practices in place.
- Share your experiences in working with information exchange systems on chemicals and doing substitution with other companies, not the least with low and middle income country companies that may not be accustomed to such work.
- Share your positive experiences from stronger chemicals legislation in the EU with companies inside and outside the EU, for example when it comes to your rate of innovation.

<sup>6</sup> Chemicals in Products Programme for information sharing on chemicals within and outside supply chains ([http://www.naturskyddsforeningen.se/sites/default/files/dokument-media/missing\\_pieces\\_2016.pdf](http://www.naturskyddsforeningen.se/sites/default/files/dokument-media/missing_pieces_2016.pdf))

<sup>7</sup> SIN list (<http://sinlist.chemsec.org/>)



Information about chemicals in material flows must improve as we realize a circular economy. In summary – close the information gaps, do not maintain them! In fact, it is your moral responsibility to contribute to a more sustainable development. Substitute harmful chemicals and join the CiP!

Yours sincerely,

Karin Lexén  
Secretary General of the Swedish Society for Nature Conservation

Co-signatories:

European Environmental Bureau (EEB)  
International POPs Elimination Network (IPEN)  
Center for International Environmental Law (CIEL)  
Client Earth  
HEJSupport – Health and Environment Justice Support  
Det Økologiske Råd, Denmark  
Framtiden i våre hender, Norway  
Arnika, Czech Republic  
Eden Environmental Center, Albania  
MAMA-86, Ukraine  
ECO-Accord – Center for Environment and Sustainable Development, Russia  
KANCED, Canada  
Sciencecorps, USA  
Association de Protection de l'Environnement et du Développement Durable de Bizerte (APEPDUB), Tunisia  
Association de l'Education Environnementale pour les Futures Generations (AEEFG), Tunisia  
groundWork, South Africa  
Centre Optionnel pour la Promotion et la Régénération Economique et Sociale Secteur Afrique (COPRESSA), Cameroon  
GAPROFFA, Benin  
Sustainable Research and Action for Environmental Development (SRADev), Nigeria  
Ban Toxics !, the Philippines  
Eco Waste Coalition (with all 40 member organizations signing on to the letter), the Philippines  
TOXISPHERA Environmental Health Association, Brazil  
APROMAC Environment Protection Association, Brazil  
AMAR Environment Defense Association, Brazil