

# Substances in articles enforcement pilot project

AP. OS 5.2 – Forum's projects to be  
finalised during 2019

SiA Pilot project

Forum-34

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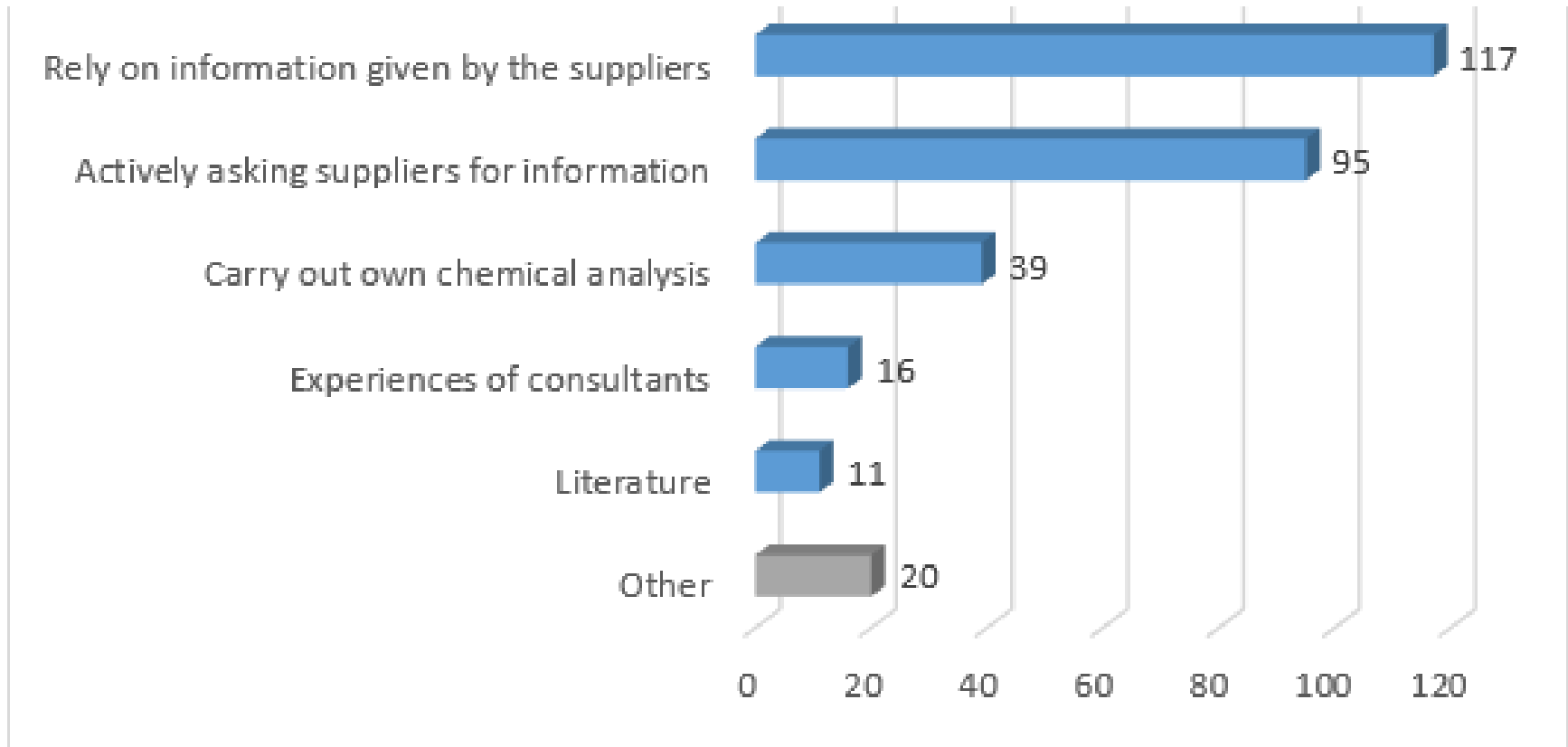
# Target articles

1. **Consumer articles:** Consumer clothing and footwear, and home textiles (e.g. draperies, cloths, carpets, mattresses, pillows);
2. **Electrical products:** External insulated wires and cables as accessories or connected to electric/electronic equipment (e.g. power, SCART, HDMI and network cables), and electric/electronic accessories (e.g. headphones, protective cases, chargers and power adapters, plugs, sockets) containing plastics or rubber materials;
3. **Building, interior articles:** Plastic (e.g. PVC) or textile flooring articles, wall coverings, and upholstered and plastic furniture (indoor and outdoor);
4. **Other:** Other plastic especially soft plastic and rubber articles or articles incorporating these materials not covered by the previous groups and intended for consumer use (e.g. DIY tools, plastic bags, plastic packaging, inflatable articles, sport and outdoor equipment).

# Results

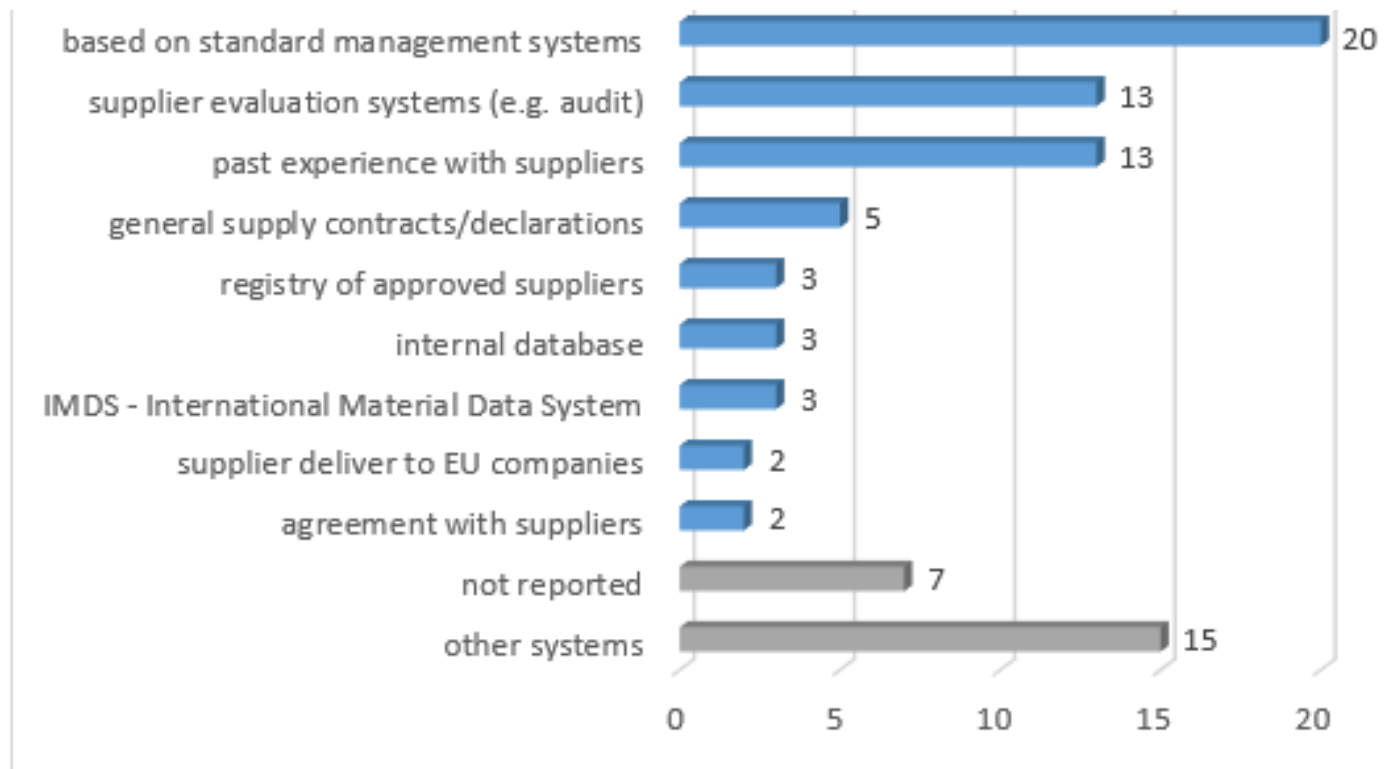
Parameter	Number	%
<b>Countries participating</b>	15 countries	100 %
<b>Companies checked</b>	405 companies	-
<b>Companies on site - questionnaire</b>	202 companies	
<b>Articles checked</b>	682 articles	-
<b>Articles containing CL substances &gt; 0.1 % w/w</b>	84 articles	12 % total articles

## Source of information



**Figure 6 – Source of information on CL substances in articles**

# Assessment schemes



**Figure 7 – Main assessment schemes for suppliers**

# CL substances in articles

	No. of checked articles (%)	No. of articles with CL substance(s) above 0.1 % w/w (%)
<b>1. Consumer articles:</b> consumer clothing and footwear, and home textiles	133 (20%)	17 (13%)
<b>2. Electric/electronic products:</b> wires and cables and electric/electronic accessories	72 (11%)	17 (24%)
<b>3. Building, interior articles:</b> plastic or textile floorings, wall coverings and plastic furniture	71 (10%)	2 (3%)
<b>4. Other:</b> other plastic and rubber articles.	406 (60%)	48 (12 %)
<b>TOTAL:</b>	<b>682</b>	<b>84 (12 %)</b>

# What substances were found?

CL substances	No. of articles
Phthalates	51 (36 DEHP)
Short-chain chloroparaffins (SCCP)	12
Diazene-1,2-dicarboxamide (C,C'-azodi(formamide)) (ADCA)	12
Lead	11
Cadmium	1
Bisphenol A	1
Brominated flame retardants (DecaBDE, HBCDD)	1
Aprotic polar solvents (DMF/DMAC)	0
Perfluorinated substances	0
Phenolic benzotriazoles	0
Phosphorous flame retardants (TCEP, TXP)	0

## Source of information CL substances

Source of information	No. of articles (%)	Notes
Chemical analysis	529 (78%)	mostly by the inspecting authority
- By the inspected company	19 (3%)	
- By a supplier of the inspected company	23 (3%)	
- By the inspecting authority	473 (69%)	
Information given by the inspected company	63 (9%)	
Information given by the supplier of the inspected company	82 (12%)	
Other sources	8 (1%)	



# Conclusions



## Notification obligations Art.7(2)

- There was **no** non-compliance found.
- The notification obligation did not apply in most inspected cases, and where it did, the company complied with the obligation.

## non-compliance rates

- Article 33.1 - 89 % Non-compliance for articles
- Article 33.1 - 88 % Non-compliance for companies
- Article 33.2 - 56% No information to comply for articles
- Article 33.2 - 51 % No information to comply for companies

**So when CL substances are found in concentrations above 0,1 % w/w, it is likely also that the companies do not fulfil the communication obligations and therefore non-compliance occurs.**

- Note: CL substances found in 84 articles of 682 checked (12 % or articles containing CL substances in the sample)

## non-compliance rates

- In 86% of the cases the inspected company had not received the information from their supplier of articles
- In 73 % of the cases, the inspected company did not give the information to their customers

**This shows that there is a big gap in the communication through the supply chain**

# Recommendations and next steps



## Recommendations - industry

**The results show that the information through the supply chain can improve significantly and it is recommended to:**

- Require dutyholders to observe their communication duties on CL substances in articles.
- Undertake awareness raising campaign
- Set clear demands on their suppliers about CL substances
- Do random chemical analysis
- Choose suppliers wisely
- Improve the information on safe handling. Only the name of the CL substance was communicated in the supply chain.

Thank you!

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