EUROPEAN DATABASE AND COMPANY CAMPAIGN

Digital compliance III workshop

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No. LIFE16 GIE/DE/000738

Context

AskREACH baseline report – companies 1
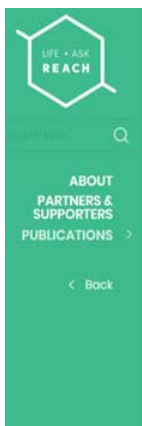
Awareness and communication on SVHCs in articles: Surveys among consumers and article suppliers

To inform its impact monitoring, the LIFE AskREACH project has recently conducted surveys of more than 14,000 citizens and of some 180 article suppliers. Documenting the results of the empirical work, the report gives insights into consumers' current awareness related to substances in articles and into companies' current situation in terms of awareness, implementation and related challenges concerning Art. 33 of REACH.

July 2019

https://www.askreach.eu/publications/

Country	No
France	67
Germany	50
Sweden	15
Czech Republic	12
Serbia	9
Croatia	8
Poland	5
Austria	4
Greece	4
Spain	4
Latvia	3
Luxembourg	1
Portugal	1

Countries and amount of company survey responses per country

Sectors	Absolute
Textiles	44
Electronics	36
Household articles	31
Sporting goods and outdoor	23
Do it yourself	25
Furniture	20
Toys	16

Sector(s) of activity of the surveyed companies

Total: **183** companies participated

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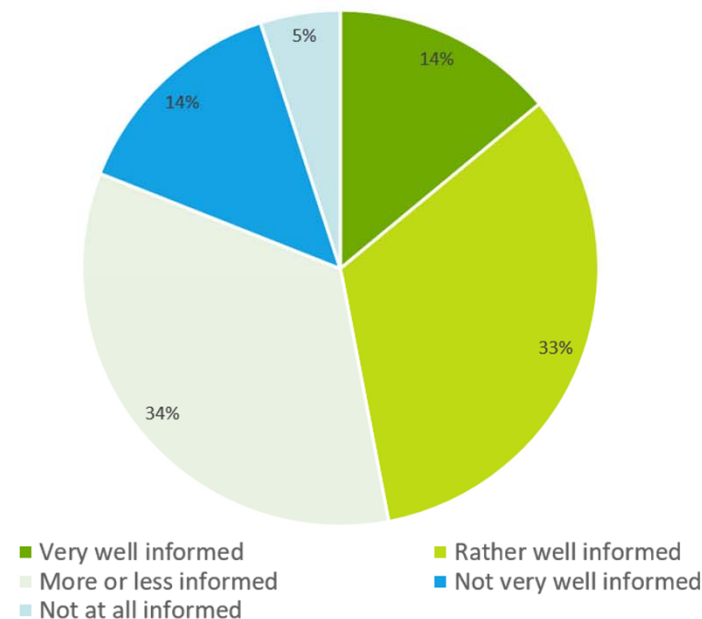
AskREACH baseline report – companies 2

- Of 183 participating companies, 42% had already received 'right to know' information requests from consumers.
- Of the companies that have received requests, nearly half did not usually have the information required to provide an immediate response.
- Only 47% of the participating companies felt well informed or quite well informed about the presence of SVHCs in their articles.
- 43% of the surveyed companies had no IT-solution in place to collect and manage information on SVHCs in their articles. Of the companies that do employ IT tools (57%), a quarter use MS Excel.

How informed do you (your company) feel about the presence of problematic chemical substances (such as SVHCs) in the articles you produce/sell?

- Very well informed — 14%
- Rather well informed — 33%
- More or less informed — 34%
- Not very well informed — 14%
- Not at all informed — 5%

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AskREACH baseline report – companies conclusions

- Supply chain communication – room for improvement

- Ability to answer consumer SVHC requests

- Forum enforcement pilot project (ECHA, 2019): **88%** of suppliers of articles containing SVHC above 0,1% failing to communicate sufficient information according to REACH Article 33(1) and **56%** of duty holders fail to communicate sufficiently according to REACH Article 33(2).*

> **The survey findings confirm concerns that a large proportion of companies are not well-prepared to respond to consumer's 'right to know' requests in compliance with REACH Art. 33(2).**

*https://echa.europa.eu/documents/10162/13577/sia_pilot_project_report_en.pdf/f9fc153b-a322-43be-1ba1-44f4e5cb02c8

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Assessment on retailer response

How well do retailers respond to REACH requests?

Martin Baumann, BUND – martin.baumann@bund.net

what we did:

- **pre-selection** of 15 product categories and ~8 largest retailers per category (in Germany)

- send **REACH requests to 117 retailers via Scan4Chem app** (and again via email if there was no reaction to app request):

- **evaluation** of retailer responses using a simple 10point evaluation scheme

  -> 1p each for confirming the request and answering it within 45d, respectively

  -> 4p for formal criteria: is the answer clear, complete, up-to-date, unambiguous?

  -> 2p for customer service: clear language, same language as request, at least trying to help?

  -> 1p each if company is self-registered in app database, and uploaded that specific article

- **analysis** of results; identification of knowledge gaps and other needs of retailers
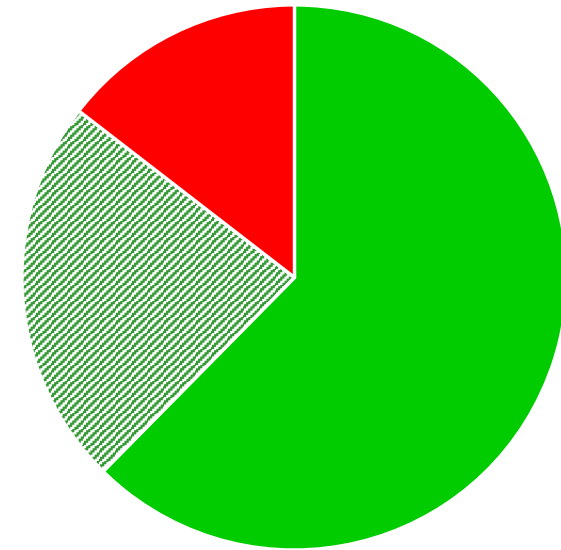
response behaviour

confirmation of requests

- 85% of retailers confirmed (automatically) that they received a REACH request

- 15% did not react at all, even in cases when articles contained >0.1% SVHC

Retailers reacted to...

- app request
- email
- not at all

answers to requests

- only 56 of 100 confirmed requests were actually answered (in some way)

- huge differences in response time: 1-63 days

- large differences between retail sectors in response rate
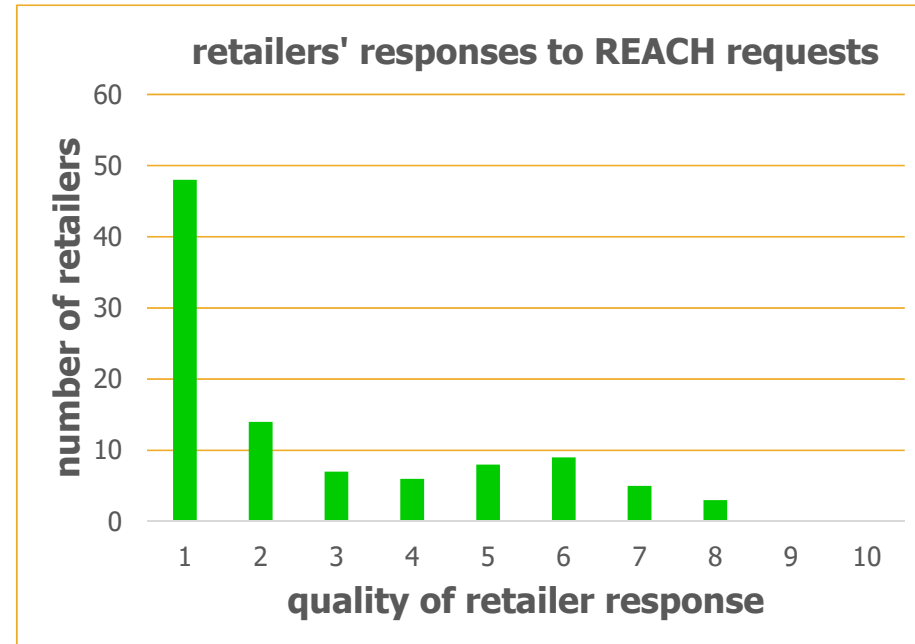
  -> groceries 82% vs. bicycles 17%

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response quality

overall picture

- most retailers give no/bad answers

  ->75% <5p; only 3 retailers with 8p

- no sector that stands out positively

- price (of article) doesn't matter

retailers' responses to REACH requests

sector / peer group comparisons

- large differences in response quality within one group

- specialized retailers do not give better responses

- size (of company) doesn't matter (caveat: we only looked at the largest retailers)

Example of a good answer to a REACH request

"Our [*product X*] with the barcode number [*123456789*] and its packaging do not contain any substances from the current REACH candidate list (as of *dd.mm.yyyy*) in concentrations above 0.1% (by weight). [This applies to all individual components of the product]."

The best way to provide a correct and **quick** answer to a REACH request is **by uploading your articles to the Scan4Chem database**.

Random article SVHC tests

SVHC tests of sports articles

- **13 organisations** from **13 European countries**

- Each organisation purchased **3-8 random sports and leisure articles** on their market area (balls, skipping ropes, bottles, weighs, mats etc.) -> total of **82 samples**

- **SVHC requests were sent** via the Scan4Chem app

Tested substances:

Substance group	Individual substances
Phthalates	DEHP, BBP, DHNUP, DIHP, DMEP, DBP, DIBP, DPENP, DiPP, PiPP, DPP, DnHP, DCHP, DNOP, DIDP, DINP, DHxP, DIHxP [1]
Chlorinated paraffins	SCCPs (short-chain chlorinated paraffins) MCCPs (medium-chain chlorinated paraffins) (not SVHCs)
Alkylphenols	Octylphenol, nonylphenol, tris(nonylphenyl)phosphite
Flame retardants	Deca-BDE, HBCDD, TXP, TCEP[2]
Heavy metals	lead, cadmium
Others	ADCA (azodicarbonamide)

| Country	Number of samples
Czech Republic	8
Latvia	6
Germany	6
Poland	6
Austria	7
France	7
Luxembourg	6
Hungary	3
Greece	8
Serbia	6
Sweden	7
Croatia	7
Portugal	5
	82

Results

- For **56% of the articles**, we received **no answer** at all, even after one or more e-mail reminders.

- **24%** of the tested articles **contained SVHCs**

- **SVHCs > 0,1% (m/m) in 11%** of the samples.

- In 7 samples, the plasticisers DEHP, DIBP or DBP were found

- Should not be placed on the market after July 2020 at a concentration higher than 0.1% (m/m).

- The plasticiser DEHP was detected with a concentration of 24% in a skipping rope, and DIBP was found at concentrations up to 35 and 41% in two types of gymnastic balls.

41 % DIBP in a gymnastic ball

35 % DIBP in another gymnastic ball
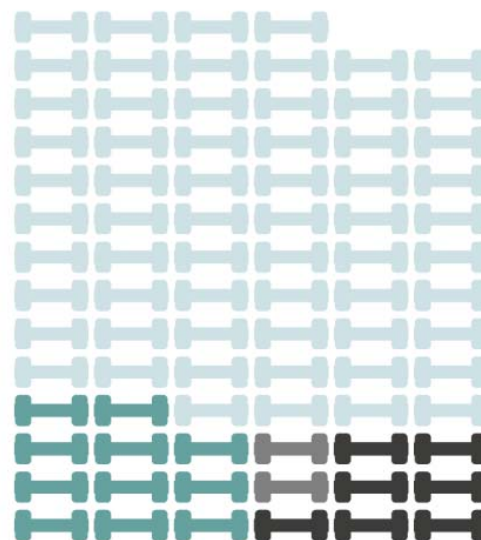
24 % of the samples contain SVHCs
9 articles contain SVHCs over 0,1 %
7 articles are not marketable
© GLOBAL2000

24 % DEHP in a skipping rope
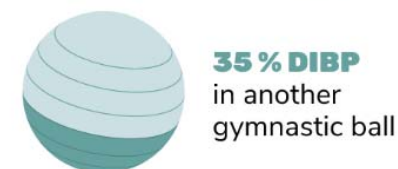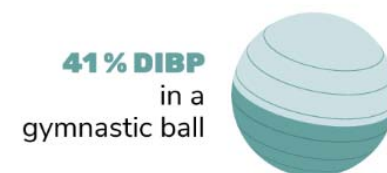
DIBP = Diisobutylphthalat
DEHP = Diethylhexylphthalat

Read more on
www.askreach.eu/publications

Our aim and solution

AskREACH - Aim

Raising **supplier** awareness on (communication) of SVHC in articles

Facilitate communication on SVHC in articles
- between **consumers** and **companies**
- Within the **supply chain**

Ensure **compliance**.
Reduce **human** and **environmental** exposure.
Promote **substitution** of SVHCs.

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Dissemination methods, channels, stakeholders

Material
- Flyers
- Posters
- Guides
- Presentations
- Videos
- Social media posts
- Photos

Multipliers
- Industry associations
- Chambers of commerce/crafts
- National REACH Helpdesks
- Competent authorities
- Consulting companies
- Ministries

Strategies
- Stakeholder mapping
- Coordination of dissemination activities: Social media strategy

Channels
- Websites
- Newsletters
- Press articles
- Industry journals
- Radio
- Webinars
- Television
- Podcasts
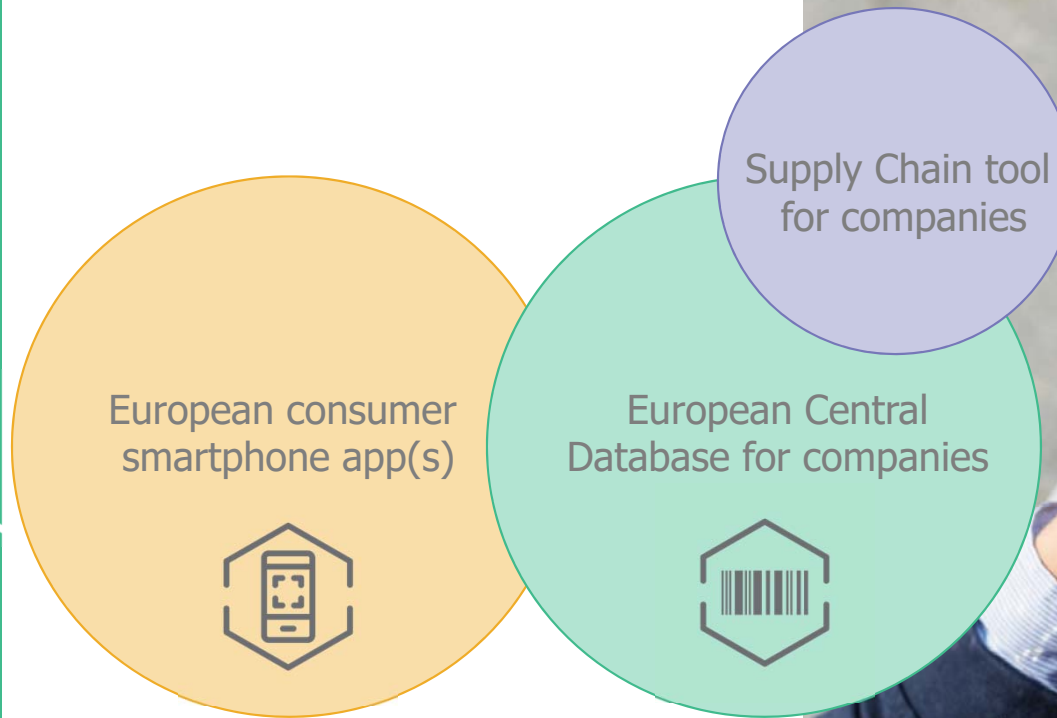- Events/fairs
- Schools
- Social media
- Conferences/trainings

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AskREACH IT solutions

AskREACH - Solutions

European consumer smartphone app(s)

European Central Database for companies

Supply Chain tool for companies

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AskREACH supplier frontend - 1

1
Register at www.askreach.eu /app-database

2
Add your company information

- **Name**
- **Address**
- **Generic e-mail address** for consumer SVHC requests
- Your **barcodes**

3
Upload your articles

- **Single** articles
- **Bulk** with excel file
- **Barcode range** declaration for SVHC-free articles
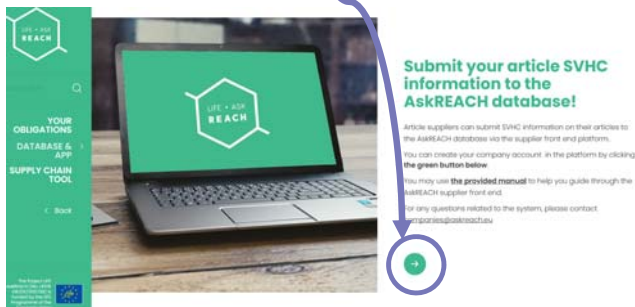
AskREACH supplier frontend - 2

- **Submitting article information**

- Article name (required)

- Barcode (optional)

- Other IDs (optional)

- Brand (optional)

- Description (optional)

- Images (optional)

- SVHC information (required)

- Instructions for safe use (optional)

AskREACH supplier frontend - 3

- Resources available at www.askreach.eu/app-database under "**Resources**"

- Full user manual

- Quick guide

- Bulk upload excel template

- Further resources available on request

- Sample letter to collect SVHC information from your suppliers

- Good practices on answering a consumer request

- Simplified IT concept

- Etc.

  Contact **companies@askreach.eu**

Quick Start

Is this your first time registering with the AskREACH supplier front end?
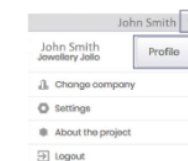
Get started in only three steps!

1. Register

Log In

A. To connect to the AskREACH supplier front end, **go to** https://suppliers.askreach.eu/

B. Choose "**Register**" at the bottom of the screen

C. **Enter** the information, click "**Register**" and follow the instructions.

2. Add company information

D. Add company information at the "**Profile**" page. If you are a barcode owner, claim your barcodes/company prefixes at the bottom of the page.

- John Smith
- John Smith / Jewellery Jollo — Profile
- Change company
- Settings
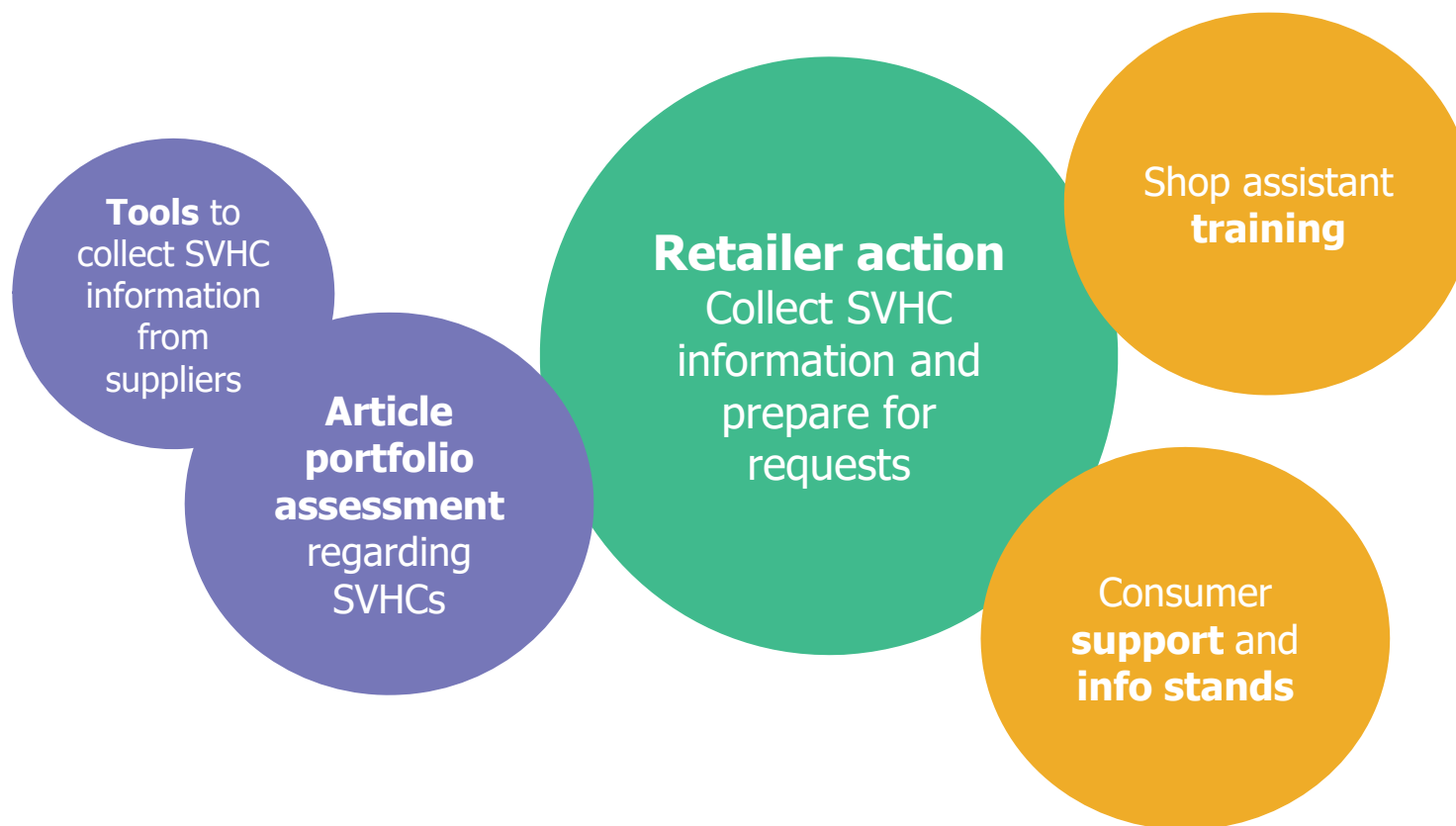- About the project
- Logout

3. Upload articles

E. Go to the "Barcode Range Declaration" tab to add the information for a range of barcodes of articles with SVHC concentrations < 0.1 % (w/w) **OR**

F. Go to "Article declaration" and click "**Add article**" to add single articles **OR**

G. To bulk-upload multiple articles, click "**More**", then "**Import**" and upload your pre-filled AskREACH supplier declaration form (.xlsx) file. Find the Excel file here.

You have successfully added your barcodes and article information about substances of very high concern (SVHCs) in the AskREACH database! After we have contacted your company and verified your registration, your article data will be available to app users. Find more detailed information on the use of the supplier front end in the user manual.

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Retailers – dedicated support

Tools to collect SVHC information from suppliers

Article portfolio assessment regarding SVHCs

Retailer action Collect SVHC information and prepare for requests

Shop assistant **training**

Consumer **support** and **info stands**

Covid-19: Need to take some retailer activities online?

2018/05/13
No. LIFE16 GIE/DE/000738

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How can your company get involved?

- Make sure to "**whitelist**" **the askreach.eu domain** to receive consumer requests

- You can answer consumer requests either via the AskREACH supplier frontend or directly replying to the request e-mail.

- **Request SVHC information from your suppliers** now

- **Register** to the AskREACH supplier frontend (www.askreach.eu/app-database)

- Participate in the specific **retailer activities** of the project (article SVHC assessment, shop assistant training, etc.)

AskREACH welcomes all articles with or without SVHCs!

The Project LIFE AskREACH
...o. LIFE16 GIE/DE/000738) is
...nded by the LIFE Programme
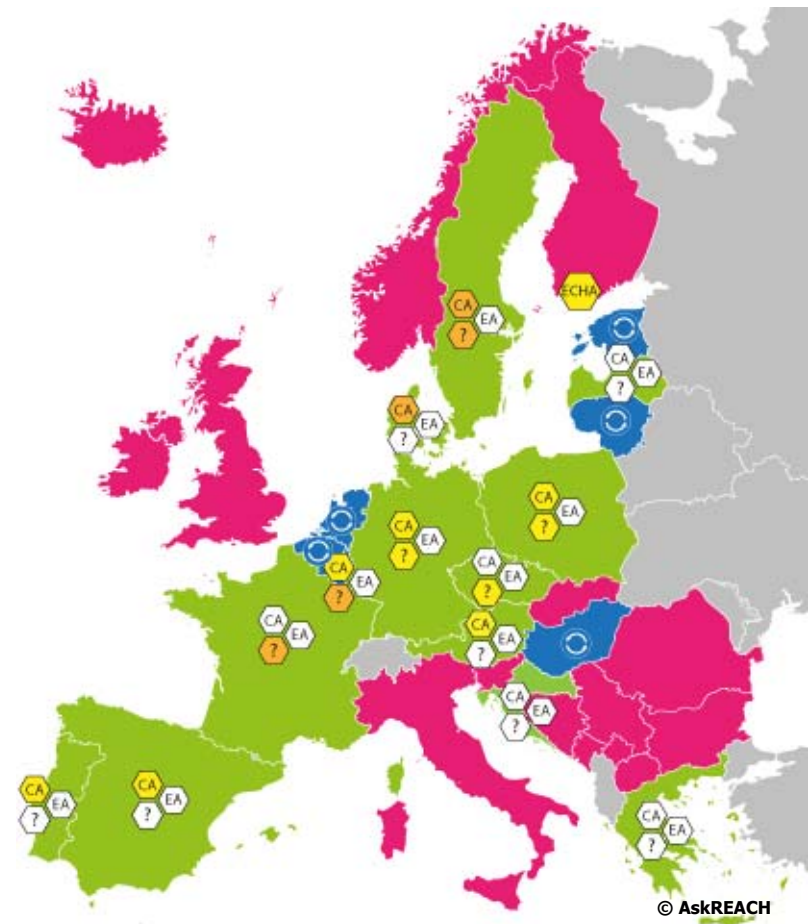... the European Union

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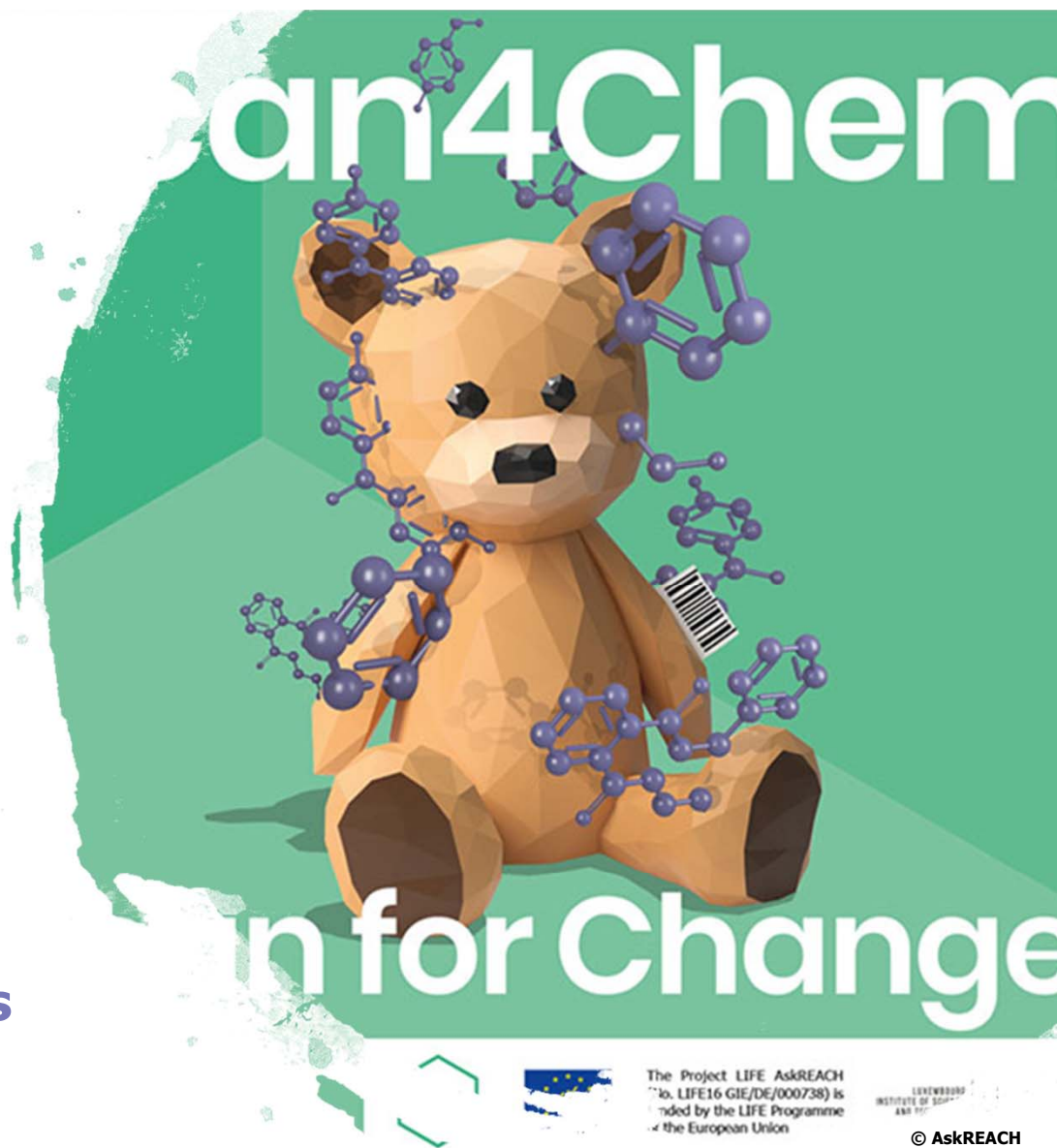
Contact us!

We are here to help you!

Luxembourg Institute of Science and Technology

Environmental Research and Innovation

Department (ERIN) - Environmental Policies

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