



AWARENESS AND COMMUNICATION ON SVHCs IN ARTICLES

SURVEYS AMONG CONSUMERS AND ARTICLE SUPPLIERS

Informing the impact monitoring of the project 'LIFE AskREACH'

Julian Schenten
Susana Fonesca
Joana Schönborn



sofia



The Project LIFE AskREACH (No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





Awareness and communication on SVHCs in articles: Surveys of consumers and article suppliers

Informing the impact monitoring of the project 'LIFE AskREACH'

Julian Schenten^a, Susana Fonseca^b and Joana Schönborn^a

supported by AskREACH project partners and Serbia collecting baseline data

a Society for Institutional Analysis – sofia, at Darmstadt University of Applied Sciences

b ZERO – Associação Sistema Terrestre Sustentável

Darmstadt and Lisbon, July 2019



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





Disclaimer: The information and views set out in this report are those of the authors and do not necessarily reflect the official opinion of the European Union and the LIFE AskREACH project.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





Contents

Glossary and abbreviations.....	6
1 Executive Summary.....	7
2 Introduction.....	9
3 AskREACH impact monitoring approach overview.....	11
4 Empirical findings.....	15
4.1 Consumer awareness and behaviour on SVHCs in articles	15
4.1.1 Eurobarometer insights.....	16
4.1.2 Survey framework.....	17
4.1.3 Awareness, concern and information regarding the presence of problematic substances in articles	18
4.1.4 Knowledge and practices regarding the 'right to know'	19
4.1.5 The role of apps as tools to provide information on SVHCs to consumers.....	22
4.2 Article suppliers' awareness and communications on SVHCs in articles	24
4.2.1 Survey framework.....	24
4.2.2 Future challenges, REACH awareness and the knowledge about SVHCs in articles	27
4.2.3 SVHC requests and preparatory actions	29
4.2.4 Time spent and costs incurred	30
4.2.5 Companies' views on the 'right to know'.....	31
4.2.6 IT solutions for data management.....	31
5 Main conclusions.....	33
6 References	35
7 Annex	37



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





Tables

Table 1: LIFE AskREACH impact monitoring indicators	13
Table 2: Number of answers to the consumer survey in each participating country	17
Table 3: Countries and amount of company survey responses per country	25
Table 4: Sector(s) of activity of the surveyed companies.....	26
Table 5: Company awareness of REACH Art. 33 obligations.....	27
Table 6: Companies' ways to collect information on problematic substances present in their articles	30

Figures

Figure 1: Level of concern about the possibility that everyday articles may have problematic substances that can be harmful to human health and the environment	18
Figure 2: Level of information about the possibility that everyday articles may contain SVHCs that can be harmful to human health and the environment	19
Figure 3: Comparison of knowledge of the 'right to know' and the number of respondents having already sent SVHC information requests to companies.	20
Figure 4: Actions in case the article to be purchased contains problematic substances.	21
Figure 5: Main reasons to download and use the app.....	22
Figure 6: Reasons for rare usage of the app	23
Figure 7: Classification of companies according to staff numbers	26
Figure 8: Legal and other challenges for companies in the participating countries.	27
Figure 9: Companies' perceived level of information about the presence of problematic substances in their articles.....	28
Figure 10: Comparison SMEs vs. Large enterprises: Level of information about presence of problematic substances.....	28
Figure 11: Companies having received SVHC requests and their ability to give adequate responses	29
Figure 12: Survey participants' opinion on REACH Art. 33 (2)	32





Glossary and abbreviations

Article: Object which, during production, is given a special shape, surface or design, which determines its function to a greater degree than does its chemical composition.¹ Chemical substances and mixtures thereof, such as cosmetics or household detergents, are not covered by the article definition and neither is food.

DB: Database

EU: European Union

FMD: Full Material Declaration of supplied (parts of) articles down to basic substance level, including declaration of all the substances used, in their respective physical and chemical states on delivery

QHSE: quality, health, safety or/and environment (department of a company)

LE: Large enterprise

MS: Member State (of the EU)

Problematic substance or problematic chemical: a chemical substance with intrinsic properties that may cause damage to human health and/or the environment. SVHCs fall under the term, which is not legally defined, as well as substances classified as 'hazardous' according to the CLP Regulation.²

Producer of an article: means any natural or legal person who makes or assembles an article within the Community.³

Product: Generic term for all marketed goods, i.e. articles, substances and mixtures, including food and cosmetics.

SME: Small and medium-sized enterprises

Supplier of an article: any producer or importer of an article, distributor or other actor along the supply chain placing an article on the market.⁴

SVHC: Substance of very high concern as legally defined by REACH Art. 57 and identified by public authorities in a formalised procedure. SVHCs include substances which are persistent, bioaccumulative and toxic or very persistent and very bioaccumulative (PBT/vPvB), substances that are carcinogenic, mutagenic or toxic to the reproductive system (CMR) and substances with properties of equivalent concern, e.g. endocrine disrupters (ED) or respiratory sensitisers. Due to their problematic properties, SVHCs may cause damage to human health, wildlife and/or the functioning of ecosystems. The group of PBT/vPvB substances are of particular concern for the environment, because they persist and accumulate in certain environmental compartments and in the food chain. The latter is also leading to considerable exposure of humans to SVHCs and potential adverse health effects.

¹ REACH Art. 3(3).

² Regulation (EC) No 1272/2008, 2008 OJ L 353/1

³ REACH Art. 3(4).

⁴ REACH Art. 3(33).





1 Executive Summary

The project LIFE AskREACH addresses the 'right to know' pursuant to Art. 33(2) of the EU chemicals regulation REACH, providing a claim for consumers to ask companies about substances of very high concern (SVHCs) in articles. AskREACH develops IT tools to foster communications about SVHCs in articles, thereby contributing to the implementation of REACH Art. 33. The project aims to reduce the emissions of SVHCs to the environment particularly by increasing consumer demand for articles free of SVHCs and creating incentives for producers to substitute SVHCs in articles. In order to review the current awareness levels of consumers and suppliers with regard to SVHCs in articles and related communications, online surveys and literature research were conducted in the AskREACH project partner countries and Serbia, the results of which are presented in this report.

Results from the literature review show that chemical substances are among Europeans' main concerns regarding environmental issues. At the same time there is a clear recognition of a perceived lack of information about substances in general.

In this regard, it is not surprising that the LIFE AskREACH consumer survey found that awareness of the 'right to know' was low among respondents. The survey results show that only in three of 14 countries were a majority of respondents aware of their 'right to know'. Of the few respondents who were aware of this right (Art. 33(2)), the majority had never sent a request of information to a company. However, the majority of respondents thought that producers or retailers should inform consumers on request whether an article contained problematic substances.

According to Eurobarometer studies, consumers are concerned about substances in products and perceive a lack of information. For most countries active in the AskREACH project, the impact on the environment seems to raise more concerns than the impact on health.

The AskREACH consumer survey shows that the general interest for more information about the presence of problematic substances in articles for children as well as in articles like clothes, shoes and accessories, at the time of purchase, is overwhelmingly high in all participating countries. In case respondents find out about an article containing SVHCs while purchasing, looking for alternatives (and only buying it if no alternatives are available) or not buying at all are the preferred options. There is a high interest in having access to an IT tool that can provide consumers with this information when they intend to buy an article.

On the other hand, survey findings among suppliers confirm concerns that a large proportion of companies are not well-prepared to respond to consumers 'right to know' requests in compliance with REACH Art. 33.

Of 183 participating companies, 42% had already received 'right to know' information requests from consumers. Of the companies that had received requests, nearly half did not have the information required to provide an immediate response in most cases. In addition, only 49% of the participating companies felt well informed or quite well informed about the presence of SVHCs in their articles. This may be linked with the finding that 42% of the surveyed companies had no IT-solution in place to collect and manage information on SVHCs in their articles.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





A major reason for companies' difficulties may be the lack of supply chain communications on SVHCs in articles. These challenges could be tackled with a supply chain approach heading towards full material declaration (FMD). Steps in this direction are supported by the supply chain tool tested by the LIFE AskREACH project together with pilot companies.

Moreover, almost half the participating companies (46%) agreed that it is technically complicated to meet the obligation to inform consumers about substances in articles. The LIFE AskREACH project is developing a Europe-wide smartphone app for consumers to submit information requests in accordance with REACH Art. 33(2). The app will be connected to a database with information on SVHCs in articles, thereby simplifying and speeding up the responses by the article suppliers. A large proportion of the companies participating in the survey believed that such an approach could be helpful.

55% of the enterprises in the survey described themselves as small or medium-sized enterprises (< 250 employees). Most frequently represented sectors in the survey were textiles, clothes, shoes and accessories (other than outdoor), and also electronics (computers, televisions, washing machines, blenders, smartphones, etc.), and domestic articles (other than electronics; kitchen utensils, decorative products, etc.). The participating companies were not representative of the actual distribution of companies in the participating countries, so that it is not possible to draw generalised conclusions. Nevertheless, the survey results do show trends about REACH Art. 33 implementation.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





2 Introduction

The project LIFE AskREACH⁵ (Sept 2017 – Aug 2022) addresses the 'right to know' pursuant to Art. 33(2) of the EU chemicals regulation REACH,⁶ providing a claim for consumers to ask companies about substances of very high concern in their articles. REACH aims at a high level of protection of human health and the environment. Another objective of REACH is that 'EU citizens should have access to information about chemicals to which they may be exposed, in order to allow them to make informed decisions about their use of chemicals'.⁷ Therefore, REACH Art. 33(2) gives consumers a 'right to know' about substances of very high concern (SVHCs) in articles (e.g. furniture, textiles, electronics, toys etc.). More specifically, the provision stipulates that on request by a consumer, any supplier of an article containing an SVHC above a concentration of 0.1 % weight by weight (w/w), shall provide the consumer with sufficient information to allow safe use of the article including, as a minimum, the name of that substance. The relevant information shall be provided, free of charge, within 45 days of receipt of the request. In addition, this provision needs to be put into context with REACH Art. 33(1) requiring suppliers to communicate to the recipient of an article down the supply chain the names of SVHCs present in those articles above 0.1 % with available safe handling information – without a need for any request by the recipient. However, both Art. 33(2) on consumer communication as well as Art. 33(1) on supply chain communications lack implementation by the duty holders.⁸

Against this background, LIFE AskREACH is developing a smartphone application that allows consumers to send 'right to know' requests after scanning an article's barcode. Answers provided by suppliers are stored in a database and will be immediately available for future requests. This IT system (central SVHC database linked with consumer apps) for the business to consumer communications in line with REACH Art. 33(2) is accompanied by comprehensive awareness campaigns. In addition, the project will foster supply chain communications on SVHCs in terms of Art 33(1) by providing a state of the art communication tool and training.

With these activities, the project aims to reduce the emissions of SVHCs to the environment particularly by increasing consumer demand for articles free of SVHCs and thus setting incentives for substitution of SVHCs in articles. Hence, the project increases transparency as regards SVHCs in articles, therefore also paving the way for increased company awareness. In a nutshell, the project intends to have the following impacts:

- Consumers are more aware, have access to information on SVHCs in articles and avoid articles with SVHCs. This should, eventually, lead to a change of market shares with a decrease related to articles which contain SVHCs at concentrations above 0.1 %.

⁵ Funded under the EU LIFE programme. See www.askreach.eu.

⁶ Regulation (EC) No 1907/2006, 2006 OJ L 396/1.

⁷ Recital 117 of REACH.

⁸ Cf. on the regulatory context of the AskREACH project Schenten and Schönborn 2018, 4.





- Companies gain a better understanding of SVHCs in their articles. At the same time, they are more incentivized to communicate the SVHC contents and, in order to maintain or increase their market shares, substitute SVHCs with less problematic alternatives.

The smartphone application will be available from autumn 2019 at first in 14 European countries⁹ cooperating in the project. Eventually, at the end of the project in 2022 it shall be available throughout the EU and beyond. With the app and database approach, the project thus aims to have an immediate socio-economic impact. Besides, a limited number of 'pilot' companies will be involved in the supply chain action, which aims to show feasibility of proactive communication on substances in articles in different sectors.¹⁰ This approach, however, has 'game changing' potential in terms of how companies manage their production processes and supply chains.¹¹

A dedicated part of the project aims to monitor and assess its impacts, measured by a set of indicators (section 3). Some indicators require determination of a baseline reflecting the status quo before the project has produced relevant outputs. To this end, the project surveyed its key target groups, i.e. consumers and article suppliers. This publication presents the main survey findings. Section 4.1 gives insights into consumers' current awareness related to substances in articles. Section 4.2 presents companies' current situation in terms of awareness, implementation and related challenges concerning Art. 33 of REACH. This is followed by a summary of the key findings which are pivotal for the project's impact monitoring.

⁹ AskREACH partner countries: Austria, Croatia, Czech Republic, Denmark, Germany, France, Greece, Latvia, Luxembourg, Poland, Portugal, Spain, and Sweden. Replication country: Serbia

¹⁰ This is due to capacity restrictions, as pilots will receive communication support from the project.

¹¹ Cf. Schenten, Führ and Lennartz 2018.





3 AskREACH impact monitoring approach overview

LIFE AskREACH uses a comprehensive scheme to monitor the impacts induced by the various project actions. The project aims to reduce emissions of SVHCs to the environment. However, relevant data on these emissions is not readily available and they are difficult to calculate.¹² The AskREACH impact monitoring approach therefore focuses on socio-economic factors and relates to stakeholder awareness and behaviour, in particular. It is based on a set of indicators which provide an indication of behavioural change in terms of consumers and suppliers (e.g. via market uptake of tools and raised awareness). Table 1 briefly explains the LIFE AskREACH indicators for impact monitoring.

No.	Indicator	Approach
1	Number of Member States in which the app is available and connected to the database.	Monitors the implementation of the app in the EU and beyond.
2	Number of new tool users	Monitors app downloads over the entire project term. Comparing country-specific downloads, this indicator gives insights into the awareness levels for issues related to substances in articles in the countries where the app is implemented. It also supports evaluation of the project campaigns.
3	Number of individual scans launched via the apps	Expresses the total amount of scans launched during the project term. It is based on the scans of each individual app user.
4	Number of individual articles scanned	Records the number of individual articles, which have already been scanned (i.e. not identical to indicator #3).
5	Number of article suppliers (article producers, importers, retailers) providing input (bulk article registration) to the database	Determines how many article suppliers have uploaded bulk information about their articles to the database, whether articles have been scanned by consumers or not.
6	Number of article suppliers providing individual answers to consumer requests without storing information in the database	Monitors the number of article suppliers that respond to the consumer requests (following step after scanning) without providing data to the database.
7	Number of articles registered in the database for which SVHC information is available	Counts the number of individual articles for which information on SVHC presence or absence is available in the database.

¹² Cf. ECHA 2016.





8	Costs of article suppliers to respond to a consumer request	Monitors the expenditures of article suppliers to respond to consumer requests, whereas the project assumes cost reductions enabled by the tools.
9	Costs of article suppliers to manage chemicals used in supply chains (including compliance with Art. 33(1) REACH)	Monitors the costs of the 'pilot companies' participating at the project's supply chain action to manage substances used in their articles. The project assumes cost reductions enabled by the tool.
10a	Consumers being more aware of the risks from SVHCs	Monitors the development of consumers' level of information about SVHCs in articles.
10b	Consumers being more aware of right to know	Determines the share of consumers in the partner countries, who claim to be aware of their right to know on SVHCs in articles; and related developments.
11	Article suppliers compliant with REACH Art. 33(2)	Indicates the compliance rates with REACH Art. 33(2). The aim is to increase the compliance rates of suppliers using the project tools (app and database).
12	Article suppliers along the supply chain compliant with REACH Art. 33(1)	Assesses the extent to which suppliers of 'pilot companies' participating at the project's supply chain action meet their reporting obligations under REACH Art. 33(1).
13	Number of events organised to raise awareness of article suppliers	The project partners organise info days for companies, contribute to industry newsletters and journals and promote the database in business portals; they are also working with national multipliers such as chambers of commerce and industry associations to encourage industry to fill the database.
14	Number of events organised to raise awareness of the general public	The project partners are organising a series of events. The teams in each country will organise info days and set up exhibition stands, hold seminars and participate in events with fitting thematic focus organised by others.
15	Number of events organised to raise awareness of public authorities	Annual roundtables in each of the 13 partner countries as well as international seminars and conferences will address awareness of public authorities.
16	Number of individuals surveyed	Overall total number of individuals surveyed (online or face-to-face questionnaires, interviews etc.).
17	Number of website visitors and duration of their stay	Number of visitors to the project website and duration of stay.
18	Number of tool users not buying articles containing an SVHC above 0.1%	Estimates the number of tool users who do not buy articles for which the app provides information that an SVHC is contained (and if an alternative is available).





19	Number of article suppliers having substituted or initiating substitution of SVHCs	Collects data on article suppliers that have substituted or initiated a substitution process regarding SVHC in articles.
20	Decline in sales of articles containing SVHCs above the 0.1% threshold	Assesses impacts on sales of articles containing SVHCs in the database.
21	Change of sales trend in articles without SVHCs above 0.1%	Assesses impacts on sales of articles not containing SVHCs in the database.
22	Change of inspection strategies	Determines whether the project has an impact on inspection strategies (e.g. as regards inspection focal points).
23	Number of interest groups involved	Monitors interest groups (i.e. organisations committed particularly to consumer, environment or economic goals, including NGOs and other lobby groups) involved in the project's activities
24	Number of article suppliers (producers, retailers, importers) approached	Monitors article suppliers approached, contributing to awareness raising.
25	Number of competent authorities involved	Monitors the number of involved REACH Competent Authorities.
26	Number of other relevant public entities involved	Monitors the involvement of REACH Helpdesks, environment and health authorities, consumer protection agencies etc.
27	Number of articles, in which SVHCs are substituted	Complementing indicator #19 in terms of article numbers.
28	Number of staff of companies trained	Collects the number of persons along the supply chains of the 'pilot companies' and retail shop assistants trained during the project. ¹³
29	Number of members of interest groups trained	Collects the number of members from the partner interest groups trained during the project campaigns.

Table 1: LIFE AskREACH impact monitoring indicators

¹³ The project foresees training the staff of companies piloting for the supply chain communication tool. Additionally the project considers retailer shops as important places for consumer interaction. Therefore, training on SVHCs in articles is provided to shop assistants.





'Substitution of SVHCs' refers to various scenarios which all have the same outcome: reduced amounts of SVHCs present in a particular article. This could be done by substituting SVHCs with other less problematic or non-problematic substances (e.g. that do not fulfil the criteria of REACH Art. 57 and are not eligible for SVHC status) or by applying alternative technologies and materials.¹⁴

The uptake and use of the IT tools as well as the increase in awareness and, potentially also changes in behaviour, may take effect comparatively quickly. However, the actual substitution of SVHCs is a process that may take years, depending on the complexity of the substitution case. The monitoring approach therefore takes into account delayed substitution effects potentially materialising after the end of the project.

¹⁴ ECHA 2018, 5.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





4 Empirical findings

The project aims to reduce the emissions of SVHCs to the environment by increasing consumer demand for articles free of SVHCs and thus setting incentives for producers to substitute SVHCs in articles. As presented in Chapter 3, the project consortium developed various indicators to monitor the project's impact. Chapter 4 presents the empirical basis for deriving baseline values for consumer and supplier awareness and behaviour regarding REACH Art. 33. Section 4.1 describes the consumers' perspective, and section 4.2 focusses on suppliers' behaviour concerning REACH Art. 33 perception and implementation.

4.1 Consumer awareness and behaviour on SVHCs in articles

The AskREACH project uses two approaches to developing baseline values for the consumer awareness and behaviour: the analysis of specific Eurobarometer¹⁵ studies that address the subject of chemical substances in articles¹⁶ and a survey conducted by the AskREACH project partners and Serbia on the subject of chemical substances in articles in each of the 14 participating countries.

The survey questionnaire was prepared in two versions – one for countries with apps related to SVHCs in articles (i.e. Denmark, Germany) and the other for countries that currently have no such tools. It explored several aspects, namely:

- Knowledge of the presence of SVHCs in everyday articles, level of information and level of concern regarding their presence;
- Knowledge on the right to know, sources of information regarding consumer rights on this matter and specific actions taken (when aware of right to know);
- Interest in having access to information on the presence of SVHCs at the time of purchase (apps and online tools)
- Categories preferred to be free of SVHCs and actions taken (actual or foreseen) if an article envisaged for purchasing contains SVHCs.

¹⁵ Eight reports were considered: Special Eurobarometer 468 – Attitudes of European Citizens Towards the Environment – November 2017; Special Eurobarometer 456 – Chemical Safety – June 2017; Special Eurobarometer 416 – Attitudes of European Citizens Towards the Environment – September 2014; Flash Eurobarometer 361 – Chemical – February 2013; Special Eurobarometer 365 – Attitudes of European Citizens Towards the Environment – August 2011; Special Eurobarometer 360 – Consumer understanding of labels and the safe use of chemicals – May 2011; Special Eurobarometer 295 – Attitudes of European Citizens Towards the Environment – March 2008; Special Eurobarometer 217 – Attitudes of European Citizens Towards the Environment – April 2005.

¹⁶ In the Eurobarometer studies as well as in the AskREACH surveys, the term product is usually used instead of the term 'article' as defined under REACH, although it goes beyond the REACH definition of 'article' (see glossary). This is to facilitate the understanding of the respondent that is normally unfamiliar with regulatory terms. In the particular context of Eurobarometer studies on chemical substances, product is usually defined as paints, detergents, household products, clothes, furniture, electronics and cosmetics. In the AskREACH survey, examples illustrated that when a question referred to products, articles as defined under REACH were addressed (see Annex I). This report uses the term article, except in direct quotations.





4.1.1 Eurobarometer insights

Eurobarometer has been studying European citizens' awareness and practices regarding chemical substances since 2004. The main highlights are:

- The relevance of substances has increased in recent years and they are among the environmental concerns that Europeans are most worried about.
- When the focus is on the lack of information Europeans perceive regarding certain environmental issues, substances in articles always rank in first place. Although the percentage may vary among the different surveys, Europeans generally feel that they do not know enough about the impacts substances in products can have on their health. This tends to be the issue where Europeans feel more acutely that information is lacking.
- The knowledge about a (generic) 'right to know' seems to be there. When claimed 'if you ask whether a product contains particularly hazardous substances, the seller is required by law to provide you with this information', lead most respondents to answer 'true'. Such a response does not mean that people are aware of the specific right to know as it is laid down in REACH Art. 33. They rather share a perception that producers and retail have the general obligation to be transparent regarding the products they sell. This interpretation is corroborated by studies carried out recently in Germany. Among a sample of citizens with above average knowledge about substances, the study found less than 15% knew about right to know as it is foreseen in REACH.¹⁷
- The EU average indicates that many Europeans are worried about the impact substances present in everyday products can have on their health and the environment (84% and 90% respectively). Considering the results for the participating countries, the environmental impact of substances in everyday products raises even more concern than the impact on health.
- When European citizens are asked whether they think the products containing substances on sale in their country are safe for human health and the environment, the most common answer in Portugal, Sweden, Austria, Denmark and Spain is on the positive side. Citizens in the other nine countries are mostly negative. The distrust in the safety of products containing substances is clearer in France, Latvia, Croatia and Luxembourg.
- When it comes to who is responsible for ensuring the safety of chemical substances, the most frequent answer tends to be 'multiple actors'. When considered individually, there is a clear tendency to attribute responsibility more often to 'manufacturers'. 'EU Authorities' are also frequently mentioned.

¹⁷ Hartmann et al. 2018, 4.





4.1.2 Survey framework

The AskREACH survey for consumers was conducted during June and July 2018 (except for Serbia who applied the survey in January and February 2019). The survey reached around 14 465 recipients in 14 countries and was applied online through a link sent to contacts, included in newsletters, and promoted via social media.

Depending on the different nature of the participating organisations and the size of the countries, the number of answers per country varies between more than 5300 in Austria and 19 in Luxembourg.

Participating country	N
Austria	5303
Croatia	418
Czech Republic	1199
Denmark	2655
France	503
Germany	1104
Greece	424
Latvia	140
Luxembourg	19
Poland	780
Portugal	728
Spain	384
Sweden	379
Serbia	429

Table 2: Number of answers to the consumer survey in each participating country

People who answered the survey were not randomly sampled but contacted through the networks of the participating organisations (of members, followers and partner organizations and their networks). It is thus expected that some degree of increased interest in the topic is present.

It is also known that women tend to be more sensitive and interested in the topic of chemicals than men and most participating countries have a higher percentage of women respondents, with one exception (Austria had 58% of men in the sample).

In terms of age, the distribution seems to be quite balanced among the five age groups in the countries that managed to get a higher number of participants. In other countries certain age groups are predominant (particularly between 31 to 45 years of age). Again, Austria is a clear exception, with 51% of respondents being older than 60 years.

Most of respondents in all the participating countries have no children living in their household, either because they have no children (yet), or because the children are no longer living with them or are above 18 years old.

Another variable that is usually unbalanced in online surveys is the number of school years. This is also the case in the LIFE AskREACH survey. The percentage of respondents with a high level of education ranges from 30% in Austria to around 90% in Greece.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



safia





As for the main occupation of respondents, the most common situation is employment by a third entity (always above 50%, except in Austria where retirement is the most frequent choice).

4.1.3 Awareness, concern and information regarding the presence of problematic substances in articles

The results of the survey clearly show that in most participating countries, except for Spain, the degree of awareness regarding the presence of problematic substances (including SVHCs) in common articles like shoes, toys or clothes is very high. More than 75% of those who answered (in seven countries it was more than 90%) state that they are indeed aware of the presence of substances that may be harmful to human health and the environment in articles.

Being aware of the potential presence of problematic substances in articles doesn't seem to relate to the level of concern. The results show that countries like Sweden, Denmark, Austria, and France, where awareness seems to be high, are not the ones showing the higher degree of concern. In fact, it is in Spain, where awareness appears to be lower, that the levels of concern (particularly in the first category 'extremely concerned') are higher. Nevertheless, most participating countries (nine) show a high level of concern with more than 70% of answers in the first and second categories ('extremely concerned', 'highly concerned'). Five countries have more than 90% of the answers in these categories.

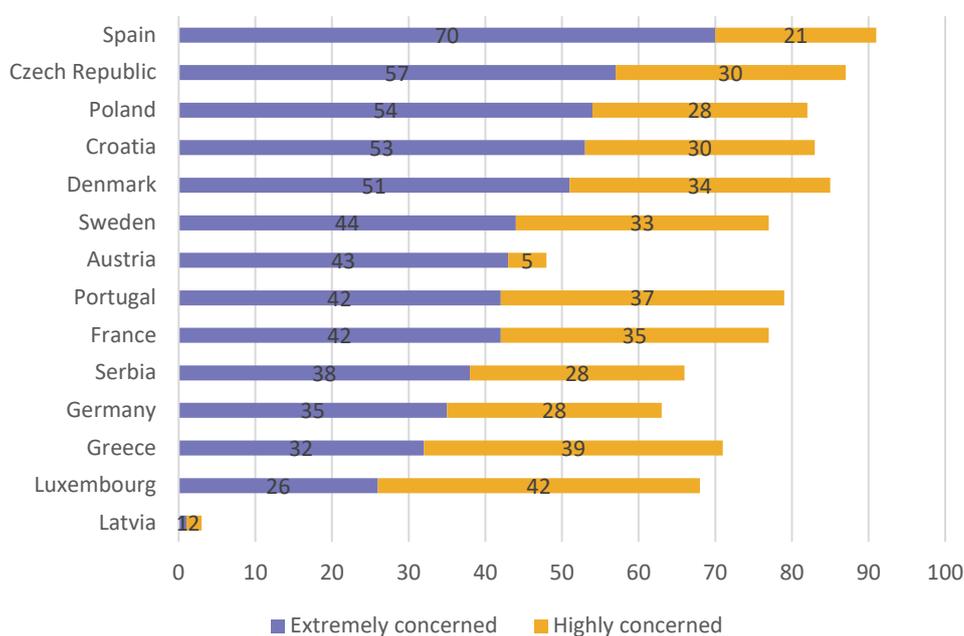


Figure 1: Level of concern about the possibility that everyday articles may have problematic substances that can be harmful to human health and the environment

This general perception that there are SVHCs in articles bought on a day-to-day basis and the high levels of concern this seems to be raising among citizens in most of the participating countries, is also linked to the lack of information people perceive regarding such issues. If one considers that in nine of the fourteen countries more than 60% of respondents state that they are either "not at all informed"



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





or 'not very well informed', it becomes clearer that the awareness people have seems to be based not on actual information, but more on a general idea: in many cases a threat that is felt as real, but that people feel they have no way of controlling due to lack of information (Figure 2).

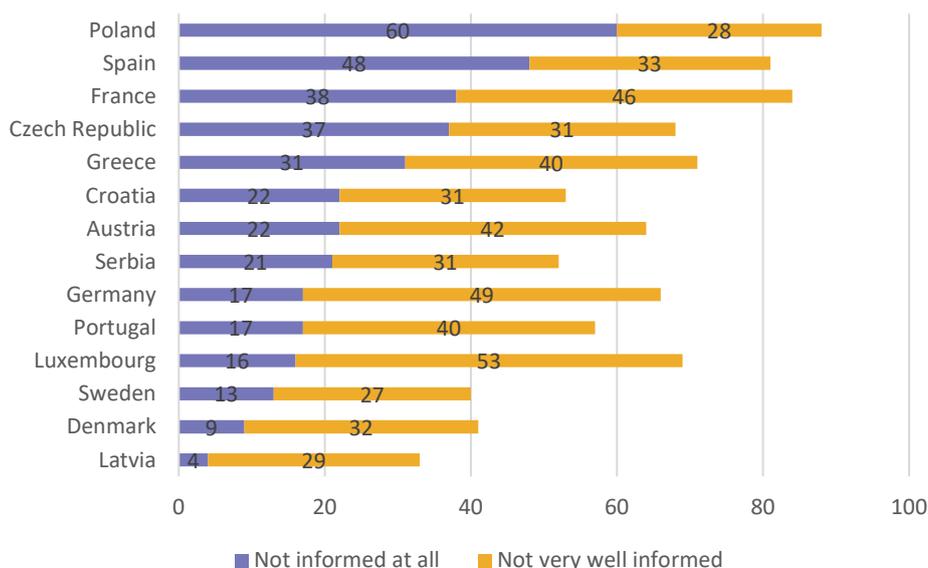


Figure 2: Level of information about the possibility that everyday articles may contain SVHCs that can be harmful to human health and the environment

When asked if they would like to get more information about the presence of problematic substances in articles at the time of purchase, an overwhelming majority agreed in all participating countries where this question was asked¹⁸. The lowest percentage of agreement was 93% in Latvia.

4.1.4 Knowledge and practices regarding the 'right to know'

With the REACH Regulation consumers gained the right to know whether an article they intend to buy or have already purchased contains any chemical substances identified as SVHCs above a concentration of 0.1% (weight/weight). According to REACH Art. 33(2), companies are obliged to answer a consumer enquiry about the presence of an SVHC in an article within 45 days of the request if an SVHC is present.

This right is, nevertheless, not well known and is seldom used by consumers on a regular base. Results from the consumer surveys show that only in three participating countries were most respondents aware of this right and in all participating countries the majority of those who were aware of this right had never sent a request of information to a company (Figure 3).

¹⁸ It was not included in the surveys applied in countries that already have apps to give information on the presence of problematic substances in products, namely Germany and Denmark, and in Luxembourg, that used the same version as Germany, although there is no app in the country



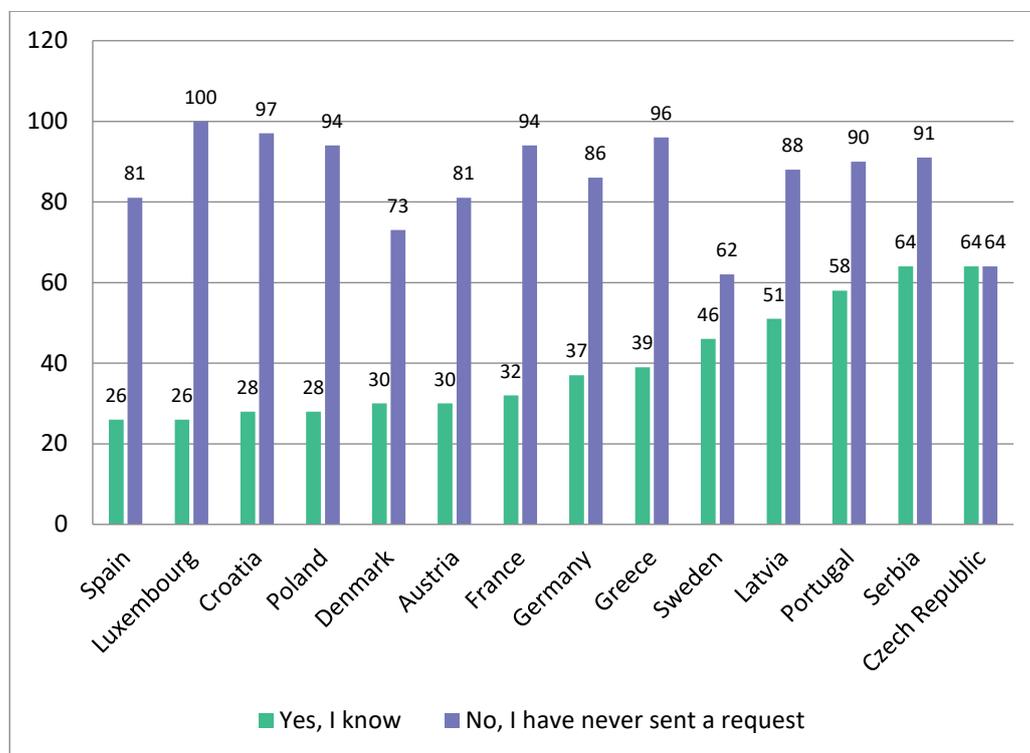


Figure 3: Comparison of knowledge of the 'right to know' and the number of respondents having already sent SVHC information requests to companies.

Results from the LIFE AskREACH survey follow a similar pattern to those of the Eurobarometer studies. Both imply that knowledge on the right to know is higher than expected. These results should be carefully analysed, since in both cases the approach is generic and allows for a broader interpretation by respondents that may read the question as a general right of citizens and not specifically focused on SVHCs in articles and all the details surrounding the request by consumers and the response by companies.

Therefore, although the knowledge on the right to ask and to receive an answer from companies if a problematic substance is present, tends to be low in most participating countries (with some exceptions) one can predict that it will be even lower in reality. For example, a recent study in Germany (with non-representative samples that can be characterised as being more interested and knowledgeable of these issues than the general population and with more specific questions on the right to know) point to only 15% of the respondents knowing what the right to know is.¹⁹ In this context, it can be expected that the general population will show even lower levels of awareness on the issue.

When it comes to the categories of articles that respondents seem to consider more important to buy free of SVHCs, the ones chosen more often were articles intended to be used by children as well as clothes, shoes and accessories. Nevertheless, in thirteen of the fourteen countries most answers are concentrated in the answering category 'all of the above', showing that it is very difficult for

¹⁹ Hartmann et al. 2018.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





respondents to choose from a list, when the general wish seems to be that such substances wouldn't be found in any product.

The AskREACH survey also addressed the action a respondent would take as a customer on finding out that an article contained problematic substances like SVHCs. The five choices offered included: 'I would buy the product as usual' and 'I would buy the product but use it less often'. In several countries, these options were never chosen. The other three possible choices were: 'I would look for an alternative with no such chemicals, but if it is not available I will buy it anyway', 'I would never buy a product that contains such chemicals' and 'It depends on the product'. The distribution of answers varies according to the countries. Austria, Germany Greece, Spain, Czech Republic, Serbia and Denmark are the countries where participants more often chose the option of never buying articles with SVHCs. In Poland, Portugal, Latvia, France and Luxembourg it seems to be more acceptable to buy such articles anyway, if no alternatives are readily available. This difference might have something to do also with the perception of existing alternatives (for example articles with an ecolabel), since in several of these countries it is not so common for these to be regularly available (Figure 4).

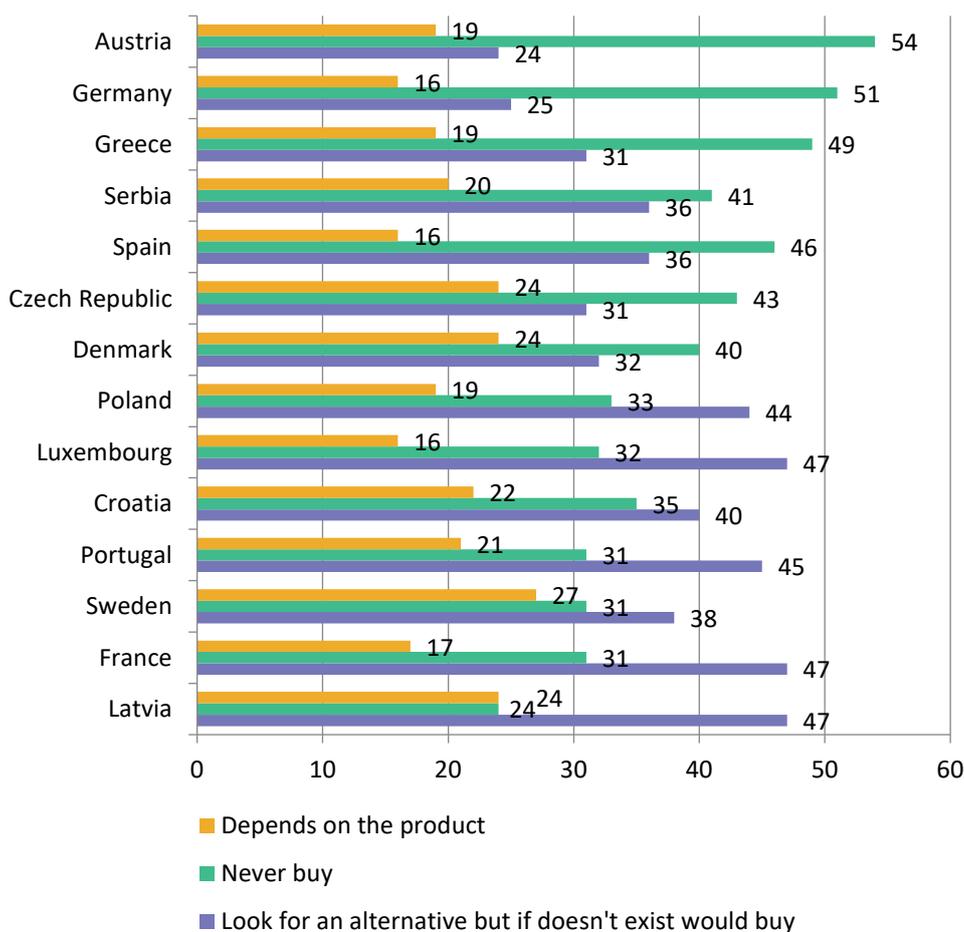


Figure 4: Actions in case the article to be purchased contains problematic substances.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





4.1.5 The role of apps as tools to provide information on SVHCs to consumers

Considering the objectives of AskREACH, the AskREACH surveys included some questions regarding the role apps can play in providing consumers and the general public with information about problematic substances in articles they intend to buy. Since Germany and Denmark already have apps, the survey included some questions regarding the experience with such tools. In all the other participating countries, the questions focused on the interest respondents might have in having access to such an IT tool.

Results show very clearly that in all the participating countries where this question was included in the survey there is a high interest in having access to an IT tool that can provide consumers the information they need about the presence of problematic substances in articles they intend to buy. At the same time, a separate study in Germany shows many consumers prefer even more convenient provision of such information, e.g. by displaying it on the packaging (including with a pictogram).²⁰

Anyway, the results (both from the Eurobarometer and from the AskREACH surveys conducted in the fourteen participating countries) clearly show that consumers feel a great need for more information on the chemical safety of the everyday articles they buy, and if that information reaches them through an app, it will most certainly be appreciated and used, even if it is not the preferred way to access it.

The results show that 24% of the respondents in Denmark and 14% of respondents in Germany have downloaded the existing national apps.

Among the main reasons to download and use the app on a regular basis is the interest in checking the articles to see if they contain problematic substances, but also the concern regarding the impact of substances on health. Also mentioned, although less frequently, is the wish to incentivise companies so that they reduce the use of problematic substances in their articles and the impact problematic substances may have on the environment.

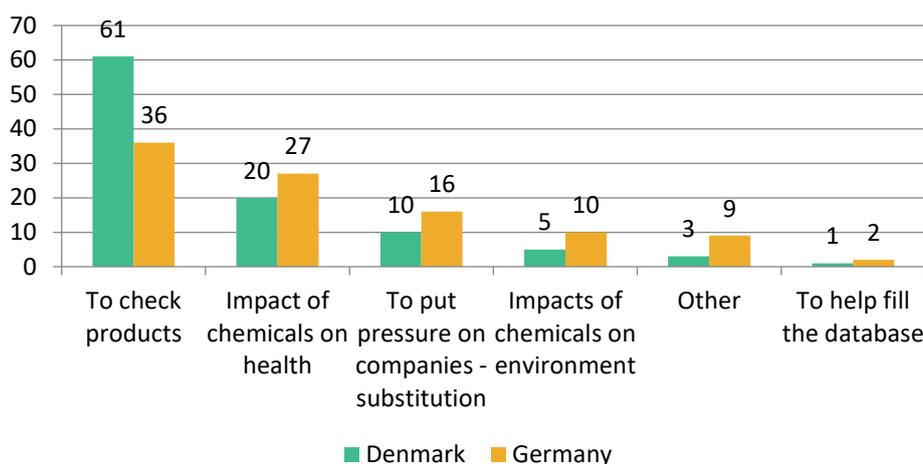


Figure 5: Main reasons to download and use the app

²⁰ Hartmann et al. 2018.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





When analysing the main reasons for not using the app regularly, buying articles with an ecolabel is the most frequent option, followed by the fact that 'I do not buy many things'. The problem of not finding the information they request directly on the app or not having immediate access to the contact details of the producer are also reasons respondents give for less frequent use of the app while shopping (Figure 6).

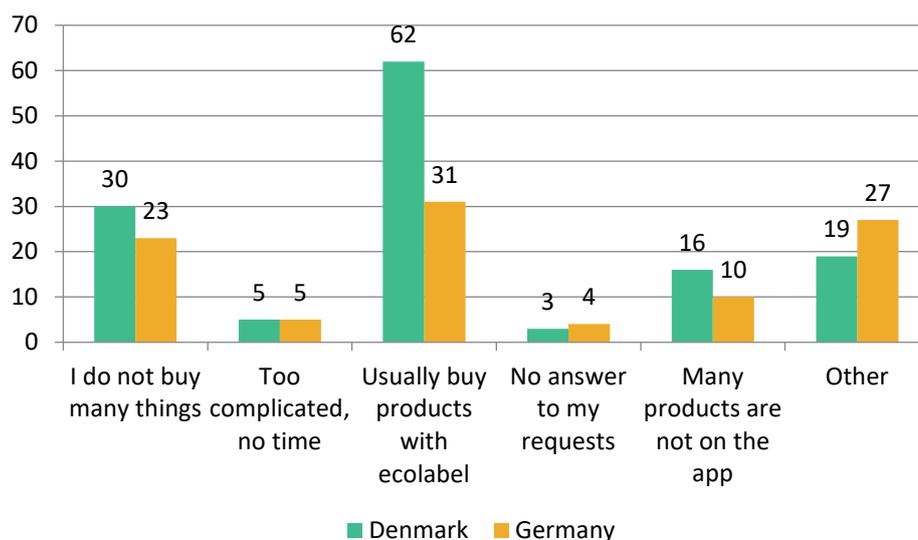


Figure 6: Reasons for rare usage of the app

Considering the increasing importance of online shopping and the challenges of guaranteeing consumer rights in the virtual arena, the survey asked respondents in the fourteen participating countries if they shopped online and whether they would be interested in having access to an online database that could provide them with the information on the presence of problematic substances in articles.

Results show that buying online is very common in some of the participating countries, but not in all. Except for Latvia, all participating countries show a very significant interest in having access to a database online that could provide them with information on the presence of problematic substances in articles they buy online.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





4.2 Article suppliers' awareness and communications on SVHCs in articles

In its second general report on the operation of REACH the European Commission found companies 'struggle'²¹ to respond to (the few) consumer 'right to know' requests. One obvious reason for this is the lack of appropriate supply chain communications on SVHCs pursuant to REACH Art. 33(1).²² ECHA reports on 'clear indications' that SVHC information is not adequately communicated along the article supply chains.²³

However, comparative empirical data on REACH Art. 33 awareness, implementation and related challenges of suppliers in member states is scarce.²⁴ Therefore, the LIFE AskREACH project surveyed companies in order to gain insights into the current situation. Using the same questionnaire, the AskREACH project partners and Serbia implemented the survey.²⁵ The main topics addressed include:

- Future challenges, REACH awareness and the knowledge of SVHCs in supplied articles
- SVHC requests, follow-up actions, and time & cost expenditures
- Companies' opinions on REACH Art. 33
- IT solutions for data management

The following sections explain the survey framework, before introducing the in depth results of the company survey.

4.2.1 Survey framework

Survey period:	July-September 2018 (except for Serbia who conducted the survey in January and February 2019); average survey period of 2.5 months.
Methods used to approach companies:	Contacts of participating organisations (members, newsletter subscribers, social media followers etc.) and contacts from associations, chambers of commerce/other organisations (including ECHA, European Commission), website announcements.
Survey methodology:	The survey was applied online through a link sent to contacts, included in newsletters and promoted via social media.

²¹ European Commission 2018a, 4.

²² Cf. Reihlen and Halliday, 24.

²³ ECHA 2016, 120.

²⁴ Cf. CSES 2015, 155; European Commission 2018b, 59.

²⁵ The Danish project partners could not implement the company survey. Besides, the survey was also accessible in countries that are not yet involved in AskREACH. Submissions from these countries are not considered in the evaluation.





The survey reached out to more than 31,000 recipients, across the EU and beyond.²⁶ 183 of these recipients participated in the survey, all located in an AskREACH partner country or Serbia. On average, some 14 companies were surveyed in each participating country (Table 3). However, the values in France and Germany were much higher than the average, with participation from 67 and 50 companies, respectively.

It should be noted that the survey was not representative, so that generalised conclusions are not possible.

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

Table 3: Countries and amount of company survey responses per country

The majority (56%) of the interrogated parties categorised themselves as small and medium sized companies (SMEs)²⁷. 44% of the companies are large-scale enterprises (> 250 employees). Figure 7 shows the distribution of company classes in the survey. 72% are producers of articles and operate mainly in the sectors *textiles, clothes, shoes and accessories (other than outdoor), electronics (computer, television, washing machine, blender, smartphone etc.), and household articles (other than electronics; kitchen utensils, decorative products, etc.)*.

²⁶ Among others, the link was disseminated in the official ECHA newsletter (weekly), which has very broad outreach. Only responses from participants in an AskREACH partner country or in Serbia were assessed.

²⁷ According to the definitions provided for in Commission Recommendation 2003/361/EC.



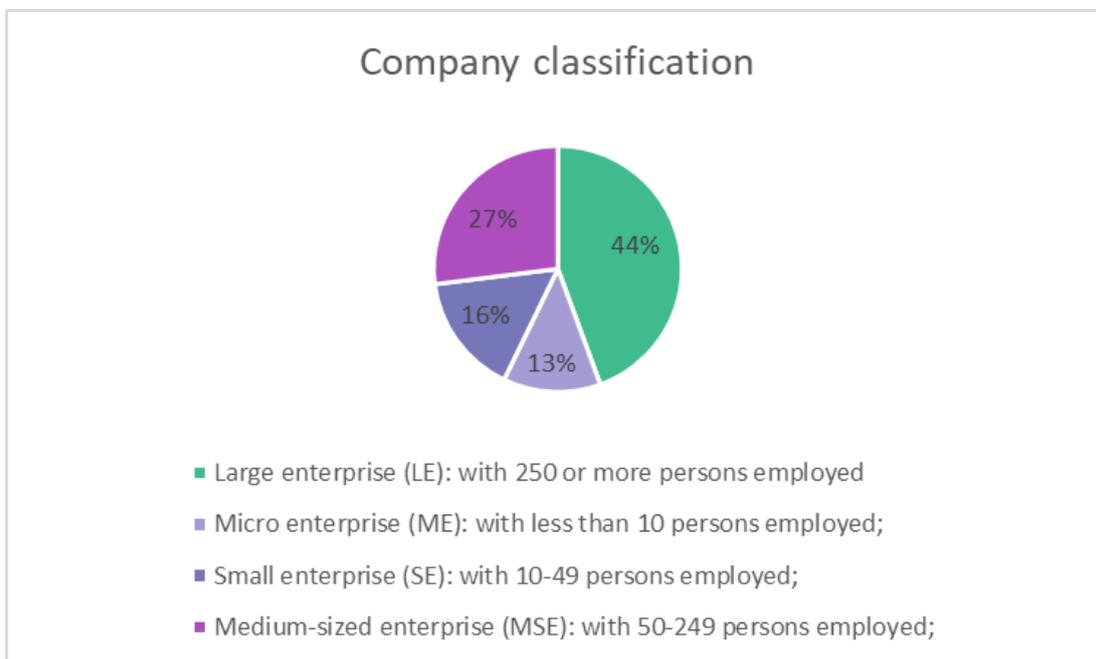


Figure 7: Classification of companies according to staff numbers

Table 4 shows the distribution of companies to the different sectors. The table shows absolute and relative data, whereas the survey allowed multiple answers.

Sectors	Absolute	Relative
Textiles, clothes, shoes and accessories (other than Outdoor)	44	24%
Electronics (computers, televisions, washing machines, blenders, smartphones, etc.)	36	20%
Household articles (other than electronics) (kitchen utensils, decorative products, etc.)	31	17%
Sporting goods and outdoor (including Textiles) (tennis shoes; soccer ball; gymnastic/fitness apparel, windbreakers, etc.)	23	13%
Do it yourself (wood, flooring, wallpaper, tools, etc.)	25	14%
Furniture (tables, chairs, cupboards, beds, sofas, etc.)	20	11%
Toys	16	9%

Table 4: Sector(s) of activity of the surveyed companies

Most of the respondents work for divisions related to quality, health, safety and environment (QHSE). In a few cases, REACH managers responded to the survey. In many cases, production managers or enterprise owners responded themselves.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





The respondents in most cases had received the link to the survey through newsletters or as social media followers. Therefore, the likelihood of increased interest in and awareness of the subject, is rather high.

4.2.2 Future challenges, REACH awareness and the knowledge about SVHCs in articles

As the most challenging area for companies in the future, the respondents name *chemical legislation* (58%), followed by *labour costs* (40%) and *supply of raw materials* (34%) (Figure 8).

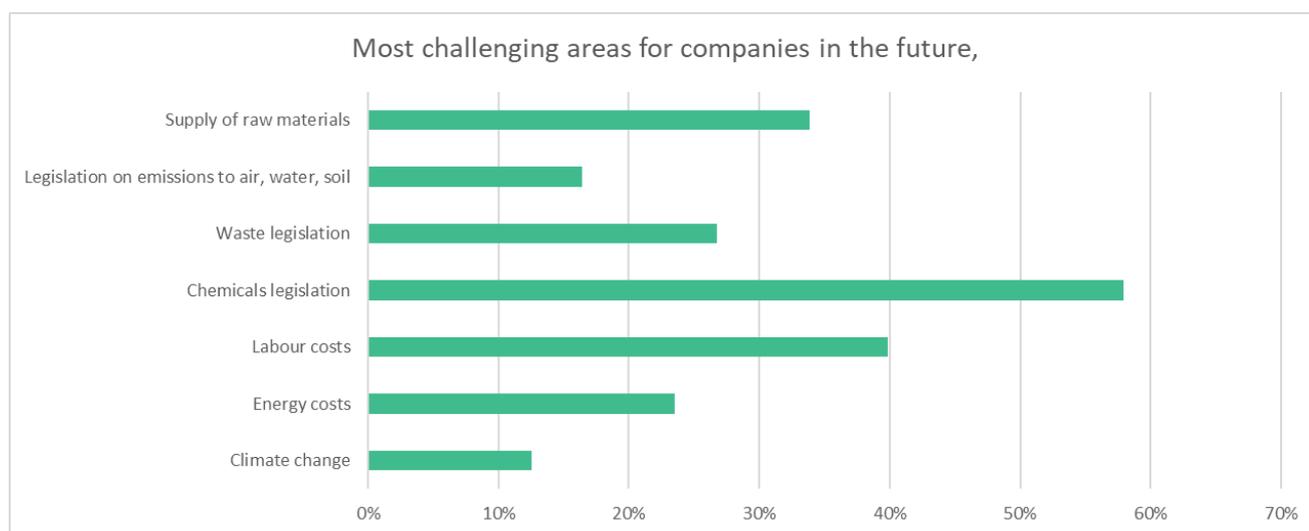


Figure 8: Legal and other challenges for companies in the participating countries.

A considerable majority of companies (89%) are aware of the REACH Art. 33 obligations (Table 5).

Country (No. of respondent companies)	Yes, my company is aware of Art. 33 obligations [in %]	No, my company is not aware of Art. 33 obligations [in %]
Luxembourg (1)	0	100
Greece (4), Spain (4)	50	50
Latvia (3)	67	33
Serbia (9)	78	22
Poland (5)	80	20
France (67)	91	9
Germany (50), Czech Rep. (12)	92	8
Austria (4), Sweden (15), Croatia (8), Portugal (1)	100	0

Table 5: Company awareness of REACH Art. 33 obligations



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





Although there is no significant difference in awareness of REACH Art. 33 between SMEs and large enterprises, there is a noticeable tendency that the smaller a company is then the more likely it is that they were not aware of their obligations. Among micro enterprises, 42% were not aware of their REACH obligations, and 20% of small enterprises. In contrast, only 6% of the medium-sized companies and 7% of the large enterprises said they were not aware.

While 90% of the surveyed companies claim to be aware of REACH Art. 33(2) only 47% feel at least rather well informed about the presence of SVHCs in their own articles (Figure 9). A major proportion of companies feel 'more or less' informed about SVHCs in their articles, and 19% feel even less informed than that.

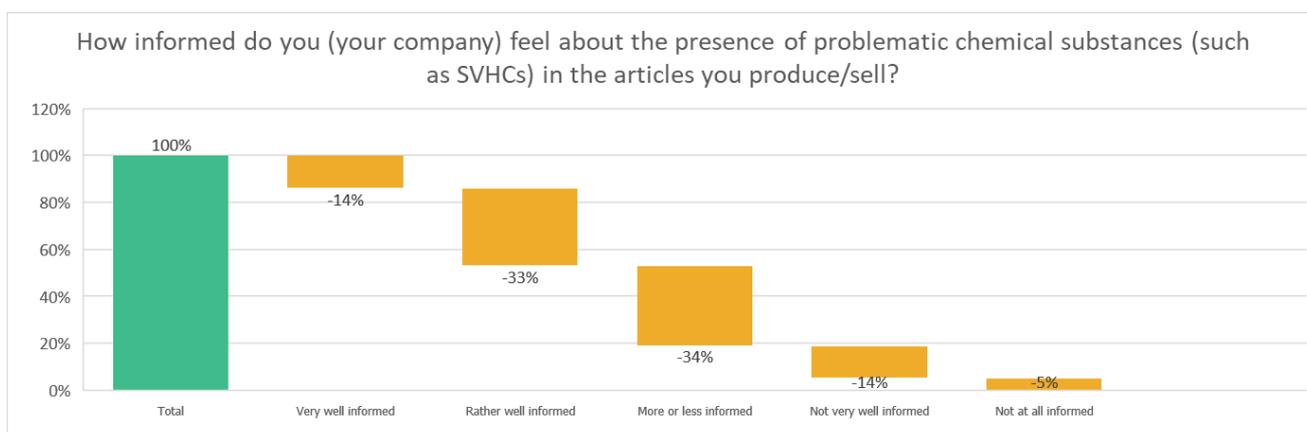


Figure 9: Companies' perceived level of information about the presence of problematic substances in their articles

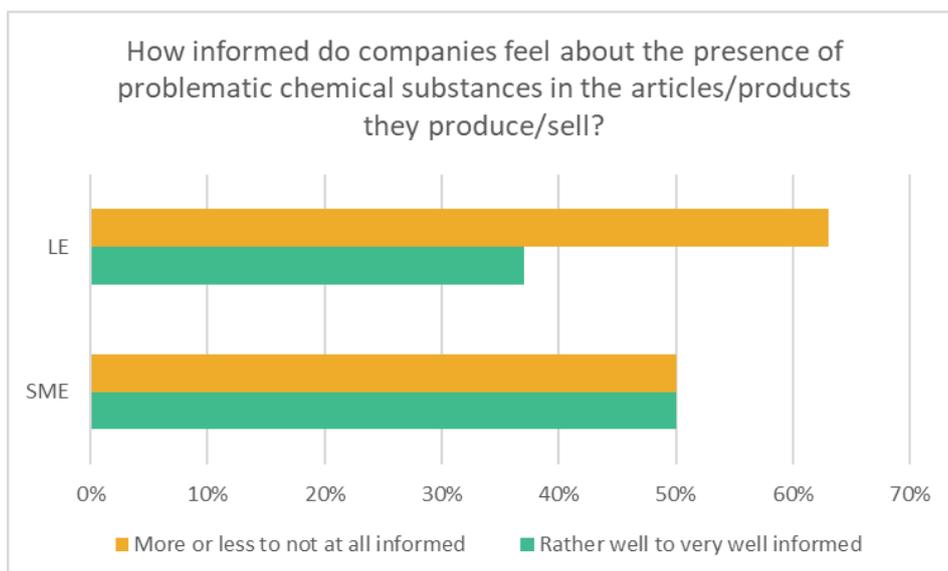


Figure 10: Comparison SMEs vs. Large enterprises: Level of information about presence of problematic substances



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





4.2.3 SVHC requests and preparatory actions

As regards specific consumer requests for information about SVHCs in articles, 42% of all respondent companies affirm that they had already received SVHC requests, while 58% had not. Sweden had the highest proportion of companies that had received requests already (73% of 15 respondents).

The numbers of SVHC requests received varies widely between the countries and companies.

Of the companies that had already received SVHC requests (42%²⁸), 60% of these companies usually had all data available to give a response. In other words, when receiving SVHC requests, nearly 40% of the companies did not have the necessary data available to give a response (Figure 11).

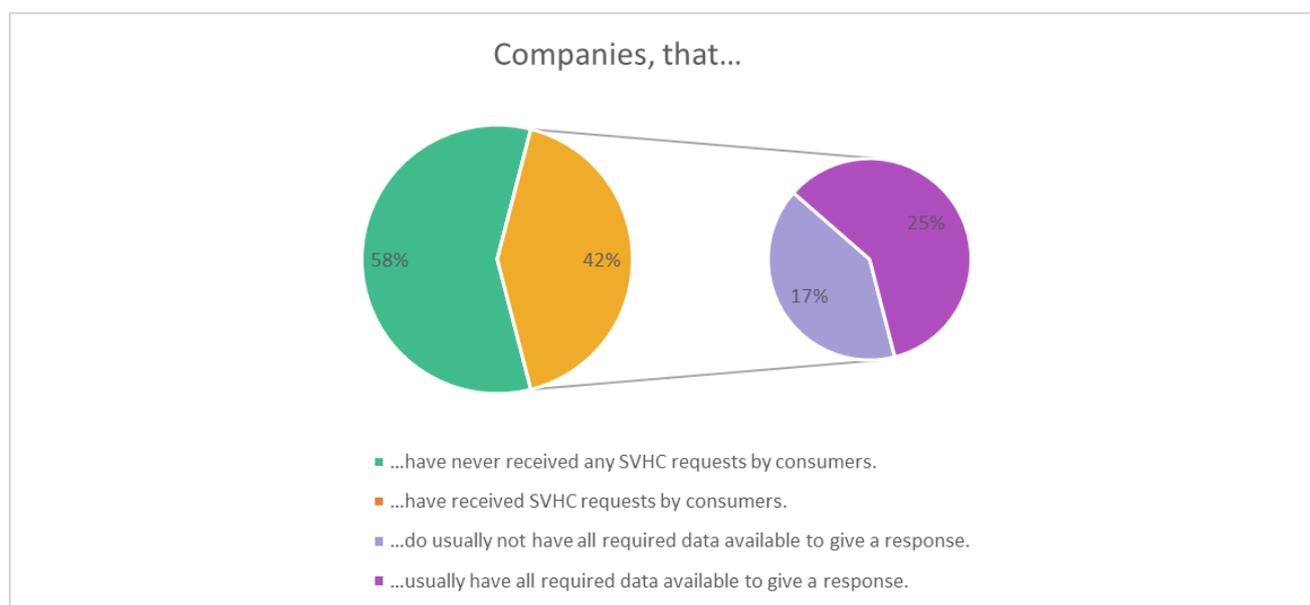


Figure 11: Companies having received SVHC requests and their ability to give adequate responses

Companies use several options to collect information on problematic substances such as SVHCs that may be present in their articles (

Table 6²⁹). Most of the companies, regardless of the company classification, request such information from the suppliers (75%). As alternative or additional option to collect relevant data, especially large enterprises include respective provisions in the suppliers' contract (42%). Among SMEs, a common option is to request evidence from suppliers that the information is correct (for example: ask for test results) (30%). Once possessing the information, most companies say they store it in their own database (84%).

²⁸ Based on the companies that had already received SVHC requests (42% of 183, i.e. 76 companies)

²⁹ Companies were allowed to give more than one answer.





Table 6: Companies' ways to collect information on problematic substances present in their articles

How does your company collect information on problematic substances such as SVHCs that may be present in your articles?	SMEs	Large enterprises
Request such information from suppliers	77%	69%
Request evidence from supplier that this information is correct (for example: ask for test results)	30%	26%
Suppliers provide such information because it is part of the contract	23%	42%
Suppliers provide such information though there is no contractual obligation	10%	17%
We do a plausibility check of what SVHCs or other problematic substances may be present in a certain fabric/material (risk analysis)	24%	31%
Third party certification (Ecolabel, Oeko – Tex, Nordic Swan, Blue Angel, etc.)	20%	24%
Chemical testing commissioned by own company (testing of a sample of products)	14%	36%

4.2.4 Time spent and costs incurred

Generally, when asked about costs caused by REACH Art. 33, most companies (47%) agreed that it involved huge costs. Only 25% of the surveyed companies disagreed.³⁰

A majority of companies estimated the yearly time allocated to requesting, processing and testing information on problematic substances such as SVHCs in the supply chain to less than a half-time employee (38%). In many cases companies did not have a person allocated for such tasks (21%). However, 83% of the companies did not know the costs per year resulting from the named activities, and consequently were not able to provide such information.

A similar situation occurred when asking about the costs for each answer to a consumer 'right to know' request. The majority (83%) claimed not to know the costs for each reply to a consumer request. Correspondingly, very few companies provided information about the costs. At the same time, the reported costs varied tremendously.

When asked about the development of costs over the past three years, a majority of companies (75%³¹) assumed that the costs for requesting, processing and testing of information on problematic substances such as SVHCs in the supply chain had increased.

³⁰ 31% neither agreed nor disagreed.

³¹ Based on 64 companies that answered the question.





When considering the survey findings, it has to be borne in mind that the introductory information accompanying the survey link disseminated to companies highlighted that economic expertise from the companies participating in the surveys would be needed, while most individuals answering the questions were from QHSE.

4.2.5 Companies' views on the 'right to know'

Almost half of the respondent companies (46%) agreed³² that it is technically complicated to fulfil REACH Art. 33 (Figure 12). There was disagreement about whether information on SVHCs in articles was a need felt by consumers. While 40% said this was not the case, 37% supported the statement and 22% were unsure. The majority of companies (54%³³) thought that the right to know reflected only a partial perspective of the problematic substances that an article may contain. A majority (60%³⁴) agreed that it incentivises replacing problematic substances with less problematic ones.

4.2.6 IT solutions for data management

Around half of the companies (48%³⁵) believed that a tool such as the planned smartphone application can support companies when implementing REACH Art. 33(2).

There is disagreement whether the planned app and database can reduce costs of communications, especially if the number of requests increases substantially. 34% of the companies were not expecting cost reductions, while 30% did. Another 30% said 'maybe'.

Most companies (42%) have not yet decided whether they want to make SVHC information available to consumers via the AskREACH European SVHC database (i.e. 'bulk upload' of data in advance). 27% would upload their information, while 30% reported they would not upload SVHC information³⁶. In regard to IT solutions to collect and manage information on SVHCs in articles, 42% of the surveyed companies had no IT-solution for this kind of information. The majority of remaining companies (58%) who employ IT-solutions used MS Excel (41%)³⁷. There were no significant differences between SMEs and large enterprises.

In terms of article identification and management, only 60% of the companies gave an answer. The majority of those companies reported using proprietary barcodes (63%), while 37% used GTIN.³⁸

³² 30% disagree and 19% are indifferent.

³³ 19% disagree and 26% are indifferent.

³⁴ 20% disagree and 19% are indifferent.

³⁵ 20% deny and 23% are indifferent.

³⁶ 42% are unsure.

³⁷ Further answers: XML 7%, CSV (3%), Others (mentioned once): PDF, Excelmacro, SDS database, SEIRICH database, IMDS (International Material Data System), Intranet, Access database, Infodyne (SDS database), External system, Chemsoft (intersolia).

³⁸ Based on the companies that responded to this question (59% of total population). Further answers (mentioned only once): internal codification, EAN13, batch number, digit barcodes for each item.



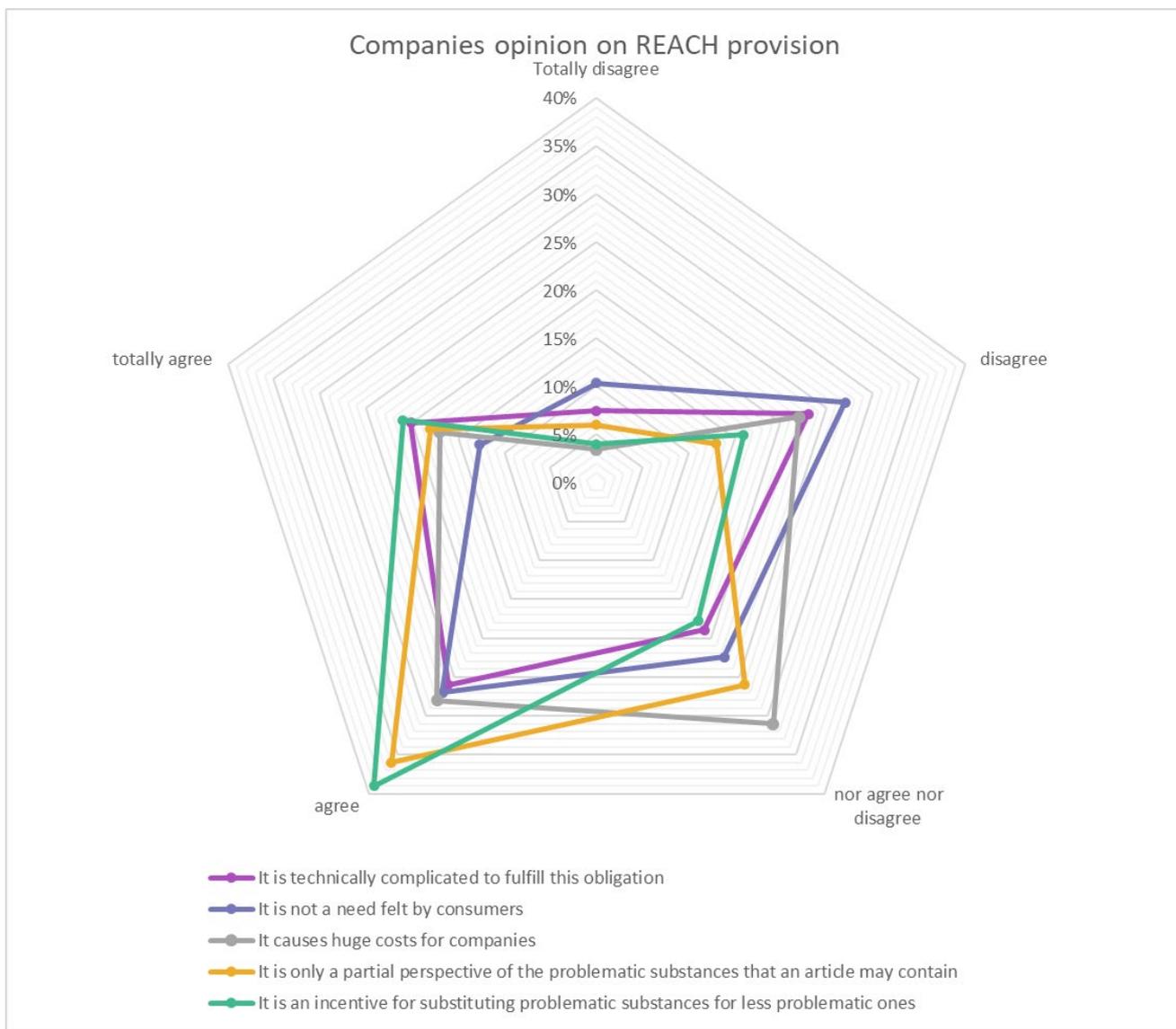


Figure 12: Survey participants' opinion on REACH Art. 33 (2)



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union





5 Main conclusions

As general remark, the LIFE AskREACH survey and the statements reported about REACH awareness and compliance for specific countries or regions are not representative. Likewise, the company numbers and categories participating in the survey per country do not reflect the actual distribution of such companies in these countries, making generalised conclusions impossible. Concerning the consumer survey, it is challenging to make an analysis of the influence of variables like age and education, due to the limitations the unbalanced samples have. Besides, it is not uncommon that cultural differences may dictate some differences in the way social variables influence perceptions, knowledge and practices.

Nevertheless, the survey results do make it possible to identify trends in terms of the REACH Art. 33 implementation of companies in different regions and REACH awareness of consumers in different countries and regions.

Results from the AskREACH consumer surveys show that only in three of 14 participating countries are a majority of respondents aware of their right to know. In all participating countries, the majority of those who are aware of this right have never sent a request for information to a company. Nevertheless, according to Eurobarometer studies, the level of concern and the perceived lack of information regarding substances in products is high among consumers although, for most participating countries, the impact on the environment seems to be of more concern than the impact on health. The general interest for more information at the time of purchase about the presence of problematic substances in articles for children as well as in articles like clothes, shoes and accessories is high in all participating countries. If respondents find out about an article containing SVHCs while purchasing, looking for alternatives (and only buying it if no alternatives are available) or not buying at all are the preferred options. Subsequently, there is a high interest in having access to an IT tool that can provide consumers with this information when they intend to buy an article.

According to the supplier survey, 42% of the 183 participating companies had already received 'right to know' information requests from consumers. 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. Of the companies that have received requests, nearly half do not usually have the necessary information available to provide an immediate response. In addition, only 49% of the participating companies felt well informed or quite well informed about the presence of SVHCs in their articles. The lack of data perceived by respondents may be linked to the finding that 42% of the companies had no IT-solution in place to collect and manage information on SVHCs in their articles.

These trends confirm the assumption that companies are struggling with REACH Art. 33 implementation, although the majority of companies (60%) agree that this provision incentivizes replacing problematic substances with less problematic ones. Furthermore, almost half of the participating companies (46%) agreed that it is technically complicated to comply with Art. 33. A major reason for companies' difficulties may be the lack of supply chain communications on SVHCs in articles. These challenges could be tackled with a supply chain communications approach heading towards full



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





material declaration (FMD). Steps in this direction are supported by a supply chain tool developed by the LIFE AskREACH project together with pilot companies. This IT solution aims primarily at facilitating supply chain communications, thus improving the information transfer along the supply chain. Furthermore, it targets efficiency gains for companies and eventually an improvement of compliance with REACH.

In addition, the LIFE AskREACH project is developing a Europe-wide smartphone app for consumers to launch information requests in accordance with REACH Art. 33. The app will be connected to a database with information on SVHCs in articles, thereby simplifying and speeding up the responses by the article suppliers. Half of the companies participating in the survey believe that such an approach could be helpful.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





6 References

CSES (2015). Monitoring the Impacts of REACH on Innovation, Competitiveness and SMEs. European Commission, Brussels. Retrieved 3 July 2019 from <http://ec.europa.eu/DocsRoom/documents/14581/attachments/1/translations>

ECHA (2016). Report on the Operation of REACH: Operation of REACH and CLP. DOI 10.2823/760148.

ECHA (2018). Strategy to promote substitution to safer chemicals through innovation, https://echa.europa.eu/documents/10162/13630/250118_substitution_strategy_en.pdf/bce91d57-9dfc-2a46-4afd-5998dbb88500.

Eurobarometer (2005). *Special Eurobarometer 217. Attitudes of European Citizens towards the Environment*. Retrieved 29 Nov 2018 from http://ec.europa.eu/commfrontoffice/publicopinion/archives/ebs/ebs_217_en.pdf.

Eurobarometer (2008). *Special Eurobarometer 295. Attitudes of European Citizens towards the Environment*. Retrieved 29 Nov 2018 from http://ec.europa.eu/commfrontoffice/publicopinion/archives/ebs/ebs_295_en.pdf.

Eurobarometer (2011a). *Special Eurobarometer 360. Consumer understanding of labels and the safe use of chemicals*. Retrieved 29 Nov 2018 from http://ec.europa.eu/commfrontoffice/publicopinion/archives/ebs/ebs_360_en.pdf.

Eurobarometer (2011b). *Special Eurobarometer 365. Attitudes of European Citizens towards the Environment*. Retrieved 29 Nov 2018 from http://ec.europa.eu/environment/pdf/ebs_365_en.pdf.

Eurobarometer (2013). *Flash Eurobarometer 361. Chemicals*. Retrieved 29 Nov 2018 from http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_361_sum_en.pdf.

Eurobarometer (2014). *Special Eurobarometer 416. Attitudes of European Citizens towards the Environment*. Retrieved 29 Nov 2018 from https://data.europa.eu/euodp/de/data/dataset/S2008_81_3_416.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





Eurobarometer (2015). *Flash Eurobarometer 361: Chemicals*. Retrieved 11/15/2018 from https://data.europa.eu/euodp/data/dataset/S1040_361.

Eurobarometer (2017a). *Special Eurobarometer 468: Attitudes of European citizens towards the environment Attitudes of European Citizens towards the Environment*. Retrieved 15 Nov 2018 from http://data.europa.eu/euodp/en/data/dataset/S2156_88_1_468_ENG.

Eurobarometer (2017b). *Special Eurobarometer 456: Chemical safety*. Retrieved 15 Nov 2018 from https://data.europa.eu/euodp/data/dataset/S2111_86_3_456_ENG.

European Commission (2018a). Commission General Report on the operation of REACH and review of certain elements. Conclusions and Actions, COM(2018) 116 fin, Brussels.

European Commission (2018b). Commission Staff Working Document, Accompanying the document Commission General Report on the operation of REACH and review of certain elements, SWD(2018) 58 fin., PART 5/7, Brussels.

Hartmann and Klaschka (2018). Do consumers care about substances of very high concern in articles? In *Environmental Sciences Europe* 30:29 <https://doi.org/10.1186/s12302-018-0153-1>.

Reihlen and Halliday (2017). Scientific and technical support for collecting information on and reviewing available tools to track hazardous substances in articles with a view to improve the implementation and enforcement of Article 33 of REACH, Luxembourg. Retrieved 3 July 2019 from <https://publications.europa.eu/en/publication-detail/-/publication/58f951af-809b-11e7-b5c6-01aa75ed71a1/language-en/format-PDF>

Schenten, Führ and Lennartz (2018), EU Traceability of Substances in Articles: Supply Chain Communication Challenges and the Perspective of Full Material Declaration (FMD), *elni* 2018/2, p. 32-38.

Schenten and Schönborn (2018). Consumer smartphone apps for problematic substances in products. Emergence and potential impacts, Darmstadt. Retrieved 11 March 2019 from <https://www.askreach.eu/wp-content/uploads/2018/12/LIFEAskREACC-consumer-Apps-for-problematic-substances-in-products.pdf>.



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia





7 Annex

- I. LIFE AskREACH surveys to consumers in countries with and without smartphone apps to use the 'right to know'



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia



Survey to be applied to consumers – Baseline study (before the launch of the app in countries with apps)

We / organisation are/is a partner of the LIFE AskREACH project, which involves 20 partners in 13 countries in the EU. We are very interested in knowing your opinion about chemicals in products. The survey won't take more than 5 minutes to complete. Thank you for participating 😊

Part 1

1.1. Did you know products you buy everyday (like toys, clothes, electronics, furniture, etc.) may contain problematic chemicals (carcinogenic, mutagenic or toxic for reproduction, etc., usually described as Substances of Very high Concern – SVHC) which can be harmful to human health and the environment?

1. Yes
2. No

1.2. In general, do you feel concerned about the presence of problematic chemicals (carcinogenic, mutagenic or toxic for reproduction, etc., usually described as Substances of Very high Concern – SVHC) in products (like toys, shoes, clothes, electronics, furniture, etc.)?

5. Extremely concerned
4. Highly concerned
3. More or less concerned
2. Not that concerned
1. Not concerned at all

1.3. How informed do you feel about the presence of certain problematic chemicals (carcinogenic, mutagenic or toxic for reproduction, etc., usually described as Substances of Very high Concern – SVHC) in products (like toys, clothes, electronics, furniture, etc.)?

5. Very well informed
4. Rather well informed
3. More or less informed
2. Not very well informed
1. Not at all informed

1.4. Did you know that every European citizen has the right to know if a product (like toys, clothes, electronics, furniture, etc.) contains certain problematic chemicals (Substances of Very high Concern – SVHC) ?

1. Yes
2. No

Part 1A

1.4.1, If yes, where did you learn that you have that right? (please choose one option)

1. In School
2. Media (television, newspapers, etc.)
3. Social media
4. Friends/family
5. NGO/Consumer Organisations
6. Retailers/Companies
7. Professional/Work environment
8. Others: _____

1.4.2 Have you ever made a request of information to companies regarding the presence of SVHC in a product?

1. Yes, several times
2. Yes, once
3. Never

Part 2

2.1. What would you do if you find out a product you are about to buy actually contains problematic chemicals, (please choose one option)?

1. I would buy the product as usual
 2. I would buy the product but use it less often
 3. I would look for an alternative with no such chemicals, but if it is not available I will buy it anyway
 4. I would never buy a product that contains such chemicals
 5. It depends on the product
- Other: _____

2.2. What kind of products do you find most important to buy free from problematic chemicals (choose three)

1. Do it yourself (wood, flooring, tapestry, tools, etc.)
 2. Electronics (computers, televisions, washing machines, blenders, smartphones, etc.)
 3. Household articles (other than electronics) (kitchen utensils, decorative products, etc.)
 4. Furniture (tables, chairs, closets, beds, etc.)
 5. Clothes, shoes and accessories (other than Outdoor) (t-shirts, trousers, slippers, sheets, coats, etc.)
 6. Sporting goods and outdoor (including Textiles) (tennis shoes; soccer ball; gymnastic/fitness apparel, windbreakers, etc.)
 7. Products intended to be used by children (toys, clothes, nappies, strollers, mattresses, etc.)
 8. All of the above
 9. None of the above
- Other. Which? _____

Part 3

3.1. Have you downloaded the BUND app ToxFox OR UBA app Scan4Chem / Danish Consumer App "Tjek Kemien"?

1. Yes
2. No

Part 3A

If yes,

3.1.1. How did you find out about the app (please choose one option)?

1. In School
2. Media: Television/ Newspaper article
3. Social media
4. Friends and family
5. NGOs / consumer organizations
6. Advertisement
7. Other source: _____

3.1.2. What is your main reason to download and use the app (please choose one option)?

- 1. I'm concerned about the impact of chemicals in products on my health...
- 2. I'm concerned about the impact of chemicals in products on the environment
- 3. I want to help fill the database and help other consumers to find the information they need
- 4. I want to put pressure on companies so that they use less problematic chemicals in their products
- 5. I want to check if the products I buy have problematic chemicals
- 6. Other: _____

3.1.3. In the last 3 months, how many times have you used the app while shopping?

1. Never
2. Less than five times
3. Between six and ten times
4. More than 10 times

Part 3B

3.1.3.a. If you rarely or never use the app please tell us why? (choose all relevant options):

1. I do not buy many things
2. It is too complicated/not practical to use/ I do not have the time
3. I mostly buy products with an ecolabel
4. I never got an answer to my requests of information
5. Many products are not on the app/ no contact details of the producer
6. Other. Which?

Part 3 (cont.)

3.2. Do you buy products (like toys, clothes, electronics, furniture, etc.) on the internet?

1. YES
2. NO

Part 3C

if Yes:

3.2.1.If it was available, would you use a webpage connected to a database that could give you information about whether the products you are planning to buy contain problematic chemicals (carcinogenic, mutagenic or toxic for reproduction, etc., usually described as Substances of Very high Concern – SVHC)?

1. YES
2. NO

Part 4

4.1. Do you have children or youngsters (until 18 years old) living with you? (Please choose all the relevant answers)

1. Yes, under 6 years old
2. Yes, between 7 and 18 years old
3. No

4.2. What is your age?

1. Less than 20
2. Between 20 and 30
3. Between 31 and 45
4. Between 46 and 60
5. More than 60

4.3. What is the highest degree or level of school you have completed?

1. Basic education (no high school diploma)
2. High school degree
3. Technical education
4. University education (Bachelor, Master, PhD)

4.4. What is your present situation?

1. Student

2. Self Employed
3. Employed
4. Unemployed
5. Staying at home parent
6. Retired
7. Studying and working
8. Other. Which? _____

4.5. Country of residence

4.6. Gender

1. Female
2. Male
3. Other
4. Rather not say

Optional section

We would like to keep in touch and send you information about chemicals in products on a regular base. If you are interested, please leave your email.

Survey to be applied to consumers – Baseline study (before the launch of the app in countries without app)

We / organisation are/is a partner of the LIFE AskREACH project, which involves 20 partners in 13 countries in the EU. We are very interested in knowing your opinion about chemicals in products. The survey won't take more than 5 minutes to complete. Thank you for participating ☺

Part 1

1.1. Did you know products you buy everyday (like toys, clothes, electronics, furniture, etc.) may contain problematic chemicals (carcinogenic, mutagenic or toxic for reproduction, etc., usually described as Substances of Very high Concern – SVHC) which can be harmful to human health and the environment?

1. Yes
2. No

1.2. In general, do you feel concerned about the presence of problematic chemicals (carcinogenic, mutagenic or toxic for reproduction, etc., usually described as Substances of Very high Concern – SVHC) in products (like toys, shoes, clothes, electronics, furniture, etc.)?

5. Extremely concerned
4. Highly concerned
3. More or less concerned
2. Not that concerned
1. Not concerned at all

1.3. How informed do you feel about the presence of certain problematic chemicals (carcinogenic, mutagenic or toxic for reproduction, etc., usually described as Substances of Very high Concern – SVHC) in products (like toys, clothes, electronics, furniture, etc.)?

5. Very well informed
4. Rather well informed
3. More or less informed
2. Not very well informed
1. Not at all informed

1.4. Did you know that every European citizen has the right to know if a product (like toys, clothes, electronics, furniture, etc.) contains certain problematic chemicals (Substances of Very high Concern – SVHC) ?

1. Yes
2. No

Part 1a

1.4.1 If yes, where did you learn that you have that right? (please choose one option)?

1. In School
2. Media (television, newspapers, etc.)
3. Social media
4. Friends/family
5. NGO/Consumer Organisations
6. Retailers/Companies
7. Professional/Work environment
8. Others: _____

1.4.2 Have you ever made a request of information to companies regarding the presence of SVHC in a product?

1. Yes, several times
2. Yes, once
3. Never

Part 2

2.1. Would you like to be given more information about the presence of problematic chemicals in products (like toys, clothes, electronics, furniture, etc.) at the time of purchase?

- 1. YES,
- 2. NO

2.2. What kind of products do you find most important to buy free from problematic chemicals that can be harmful to human health and the environment (choose maximum 3):

- 1. Do it yourself (wood, flooring, tapestry, tools, etc.)
- 2. Electronics (computers, televisions, washing machines, blenders, smartphones, etc.)
- 3. Household articles (other than electronics) (kitchen utensils, decorative products, etc.)
- 4. Furniture (tables, chairs, closets, beds, etc.)
- 5. Clothes, shoes and accessories (other than Outdoor) (t-shirts, trousers, slippers, sheets, coats, etc.)
- 6. Sporting goods and outdoor (including Textiles) (tennis shoes; soccer ball; gymnastic/fitness apparel, windbreakers, etc.)
- 7. Products intended to be used by children (toys, clothes, nappies, strollers, mattresses, etc.)
- 8. All of the above
- 9. None of the above
- Other. Which? _____

2.3. What would you do if you find out a product you are about to buy actually contains problematic chemicals, (please choose one option)?

1. I would buy the product as usual
 2. I would buy the product but use it less often
 3. I would look for an alternative with no such chemicals, but if it is not available I will buy it anyway
 4. I would never buy a product that contains such chemicals
 5. It depends on the product
- Other: _____

2.4. If, for example via an app for smartphones, you could scan the barcode of a product and find out if it contains problematic chemicals (SVHC), would you use that app?

1. Yes
2. Maybe
3. No

2.5. Do you usually buy products (like toys, clothes, electronics, furniture, etc.) on the internet:

- 1. YES
- 2. NO

Part 2A

2.5.1. if Yes:

- If it was available, would you use a webpage connected to a database that could give you information about whether products you are planning to purchase contains problematic chemicals?
- 1. Yes
- 2. Maybe
- 3. No

Part 3

3.1. Do you have children or youngsters (until 18 years old) living with you? (Please choose all the relevant answers)

1. Yes, under 6 years old
2. Yes, between 7 and 18 years old
3. No

3.2. What is your age?

1. Less than 20
2. Between 20 and 30
3. Between 31 and 45
4. Between 46 and 60
5. More than 60

3.3. What is the highest degree or level of school you have completed?

1. Basic education (no high school diploma)
2. High school degree
3. Technical education
4. University education (Bachelor, Master, PhD)

3.4. What is your present situation?

1. Student
2. Self Employed
3. Employed
4. Unemployed
5. Staying at home parent
6. Retired
7. Studying and working
8. Other. Which? _____

3.5. Country of residence

3.6. Gender

1. Female
2. Male
3. Other
4. Rather not say

Optional section

We would like to keep in touch and send you information about chemicals in products on a regular base. If you are interested, please leave your email.



II. LIFE Ask REACH survey to companies



The Project "Enabling REACH consumer information rights on chemicals in articles by IT-tools" (LIFE AskREACH, No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union



sofia



SURVEY FOR COMPANIES APPROACHED BY PARTNERS

[Partner Name] is a partner of the LIFE AskREACH project, which involves 20 partners in 13 countries in the EU. One of the objectives of the project is to work closely with companies to support them in providing information for consumer on the presence of problematic chemical substances in articles. You can get more information on the project at www.askreach.eu. We are very interested in knowing how your company deals with the presence of chemical substances in articles.

All the data collected will be used only for the project and in an anonymized way.

The survey won't take more than 15 minutes to complete and includes questions on environmental, regulatory and economic issues.

Thank you for participating.

1 Company characterization

1.1 Please select the sector(s) of activity of your company (select all those applicable)

1. Do it yourself (*wood, flooring, tapestry, tools, etc.*)
2. Electronics (*computers, televisions, washing machines, blenders, smartphones, etc.*)
3. Furniture (*tables, chairs, closets, beds, sofas, etc.*)
4. Household articles (other than electronics) (*kitchen utensils, decorative products, etc.*)
5. Sporting goods and outdoor (including Textiles) (*tennis shoes; soccer ball; gymnastic/fitness apparel, windbreakers, etc.*)
6. Textiles, clothes, shoes and accessories (other than Outdoor)
7. Toys
8. Other. Which? _____

1.2. Type of company (select all those applicable)

1. Producer
2. Retailer
3. Importer

1.3. Position of the respondent in the company

II- Supply chain management

2.1. From the following areas that can be relevant for companies, please select the two you consider most challenging for your company

1. *Climate change*
2. *Energy costs*
3. *Labor costs*
4. *Chemicals legislation*
5. *Waste legislation*
6. *Legislation on emissions to air, water, soil*
7. *Supply of raw materials*

2.2. How informed do you (your company) feel about the presence of problematic chemical substances (such as Substance of Very High Concern (SVHC)) in the articles/products you produce/sell?

5. *Very well informed*
4. *Rather well informed*
3. *More or less informed*
2. *Not very well informed*
1. *Not at all informed*

According to REACH Art. 33(1) any supplier of an article containing a Substance of Very High Concern (SVHC) in a concentration above 0,1 % by weight shall provide the recipient of the article within the supply chain with sufficient information including, as a minimum, the name of that substance.

2.3. Are you aware of this obligation?

1. Yes;
2. No

2.4. How does your company collect information on problematic substances such as SVHC that may be present in your products? (you may select more than one option)

1. Request such information from suppliers
2. Request evidence from supplier that this information is correct (for example: ask for test results)
3. Suppliers provide such information because it is part of the contract
4. Suppliers provide such information though there is no contractual obligation
5. We do a plausibility check of what SVHC or other problematic substances may be present in a certain fabric/material (risk analysis)
6. Third party certification (Ecolabel, Oeko – Tex, Nordic Swan, Blue Angel, etc.)
7. Chemical testing commissioned by own company (testing of a sample of products)
8. Other. Which? _____

2.5. What do you do with the collected information? (you can select more than one option)

1. Store in our own database
2. Print/copy and store in a binder
3. Other. Which? _____

2.6. What is the amount of time per year your company allocates to requesting/processing/testing of information on problematic substances such as SVHC in your supply chain?(please select just one option)

1. More than one full time person
2. Around one full time person
3. Around half a full time person
4. Less than half a full time person
5. Our company has no person allocated to such task
6. Other. Which? _____

2.7. Do you know the costs per year for your company resulting from requesting/processing/testing information on problematic substances such as SVHC in your supply chain?

1. Yes
2. No

If Yes, please indicate the amount per year spent on:

- 2.7.1. Human resources in house: _____
- 2.7.2. License fees for software: _____
- 2.7.3. Contracts with external consultancies (certification, testing, etc.): _____
- 2.7.4. Other costs. Which? _____

2.8. What is the trend in terms of the costs of requesting/processing/testing information on SVHC in the last three years?

1. Increasing
2. Decreasing;
3. Stable

III. Consumer "RIGHT TO KNOW"

According to REACH Art. 33(2) on request by a consumer any supplier of an article containing SVHC in a concentration above 0,1 % by weight shall provide the consumer with sufficient information, available to the supplier, including, as a minimum, the name of that substance.

3.1. What is your opinion on this REACH provision

(scale from 1 to 5 where 1 is totally disagree and 5 is totally agree)

3.1.1. *It is technically complicated to fulfill this obligation*

3.1.2. *It is not a need felt by consumers*

3.1.3. *It causes huge costs for companies*

3.1.4. *It is only a partial perspective of the problematic substances that an article may contain*

3.1.5. *It is an incentive for substituting problematic substances for less problematic ones*

3.2. Have you ever received requests of information regarding SVHC in articles by consumers?

1. Yes
2. No

If your company has received requests of information by consumers...

3.2.1. If yes, how many (approx.) did you receive overall?

3.3. Since October 2008 until the present what do you think has been the trend on the number of requests of information made by consumers

1. *Has been increasing*
2. *Has been decreasing*
3. *Has been stable*

3.4. When you receive the request, do you usually have all required data available to give a response?

1. Yes
2. No

3.5. Do you know the cost of each answer to a right to know request (on average)?

1. Yes
2. No

IV. LIFE AskREACH approach: SVHC app + database

The LIFE AskREACH Project will develop a Europe-wide smartphone app for consumers to launch requests according to REACH Art. 33. The app will be connected to a database with information on SVHC in articles, thereby easing and speeding up the responses by the article suppliers.

4.1. What is your opinion on such a tool?

1. *I believe such a tool can be helpful*
2. *I believe such a tool is not helpful*
3. *I do not have an opinion on such a tool*

If you consider this tool to be not helpful

4.1.1. Please indicate why? (Please select one or two options)

1. *SVHC are only a small part of the problem*
2. *Gives the impression that companies are using forbidden substances, when that is not the case*
3. *Production processes and related supply chains are too complicated to allow for companies to have this information for all articles*
4. *SVHC are not a relevant issue*
5. *Consumers are not interested in knowing if an article contains SVHC*
6. *Other. Which?* _____

4.2. Do you believe this app+database could reduce costs of communication, especially when the number of request increases substantially?

1. *Yes*
2. *No*
3. *Maybe*

4.3. Would you like to make your SVHC (substances of very high concern) information available to consumers via the European database (i.e. "bulk upload" of data in advance)?

1. *Yes*
2. *No*
3. *Maybe*

4.4. Does your company employ any IT-solution to collect/manage information on SVHC in articles and if so which data format(s) do(es) the solution support? (you may select more than one answer)

1. *XML*
2. *Excel*
3. *CSV*
4. *My company has no it solution to collect/manage information on SVHC in articles*
5. *Other. Which?* _____

4.5. What product classification standards do you use for your articles? (choose just one option)

1. *GS1 - Global Product Classification,*
2. *Customs code*
3. *Other. Which?* _____

4.6. Do you use GTIN (Global Trade Item Number) or does your company have proprietary barcodes? (choose just one option)

1. *GTIN*
2. *Proprietary barcodes*
3. *Other. Which?* _____

4.7. What way of data exchange would ease and speed up the (bulk) upload of your SVHC information? (more than one answer allowed)

1. *Online Data Exchange*
2. *E-Mail*
3. *HTTP(S)*
4. *FTP*
5. *Disk*
6. *USB Stick*

7. *We are not interested in participating in the project (bulk upload)*

8. *Other: Which?* _____

4.8. Would you like to support the project by participating in the first testing of database prototypes?

1. *Yes*
2. *No*

V. Economic indicators

5.1. Please indicate your company's classification

1. **micro enterprise:** with less than 10 persons employed;
2. **small enterprise:** with 10-49 persons employed;
3. **medium-sized enterprise:** with 50-249 persons employed;
4. **large enterprise:** with 250 or more persons employ

5.2 Please indicate your country (where the answer is being given)

VI. Future Cooperation

6.1. If you would like to add something to complement your answers, please do so here

If you would like to know more about the project or your company is interested in uploading the information on the LIFE Ask REACH database, please send a message to XXXXXXXX.

Thank you so much for participating!

The cooperation of your company with the LIFE AskREACH project is much appreciated.

www.askreach.eu



The Project LIFE AskREACH (No. LIFE16 GIE/DE/000738) is funded by the LIFE Programme of the European Union