

# Sweden's experiences from enforcement of REACH and other regulations for articles

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# More focus on articles

- Consumption of articles and chemicals is increasing
- 1995 to 2008, import to Sweden
  - double electrical and electronic equipment
  - textiles from 25 to 35 kg/person
- Global trade in articles
- Humans and the environment are exposed to hazardous substances from articles
  - Children particularly sensitive
- Government: Action plan for a toxic-free everyday environment 2011–2014, one of the objectives:
- ***Increase in enforcement of rules for dangerous substances in articles***



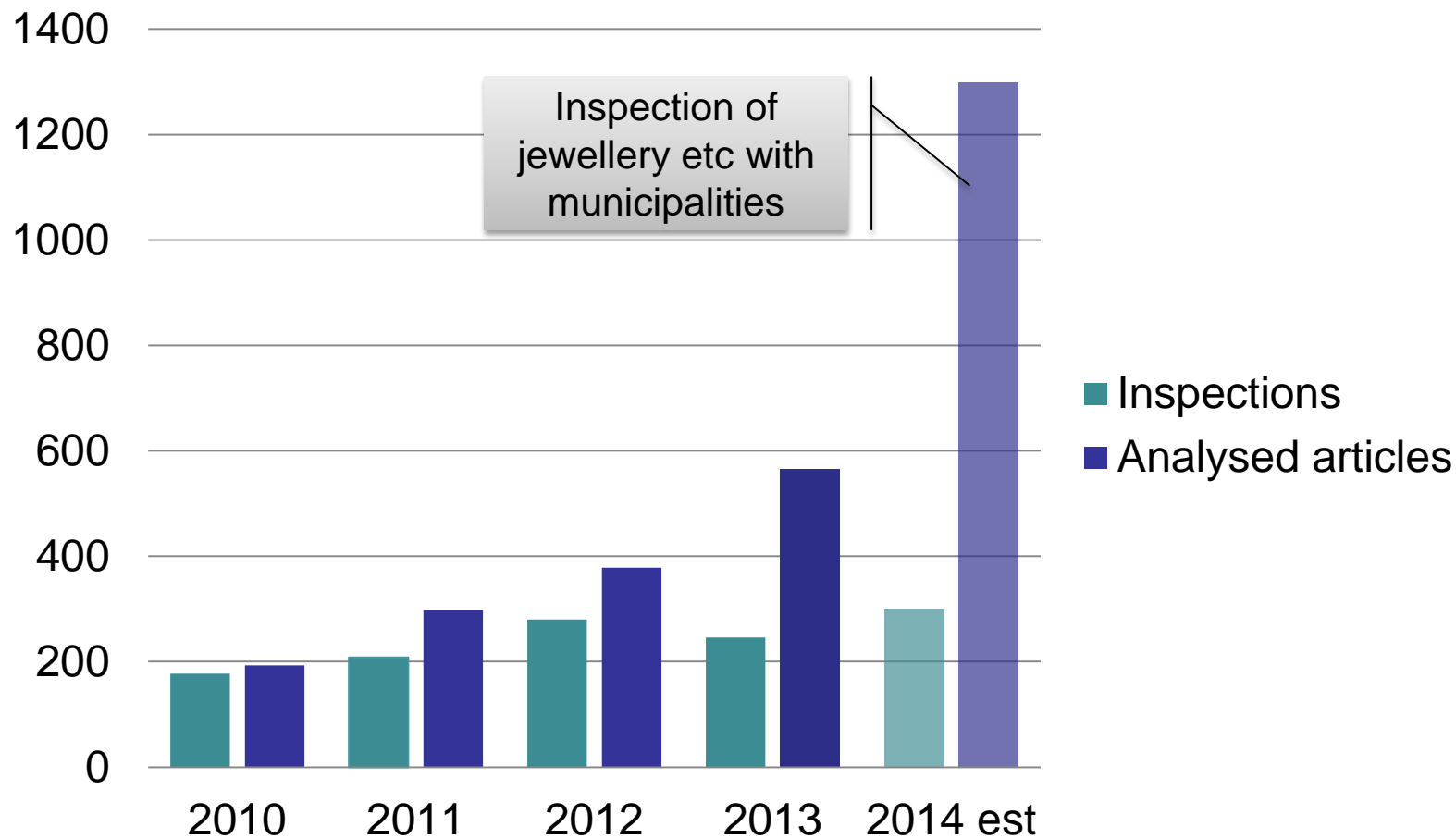
# Rules on articles – enforcement in the Swedish Chemicals Agency

- 8 inspectors dealing with articles
- Own XRF-equipment for screening
- Use external labs
- Budget analyses approx 160 kEUR/yr
- Guide municipalities on enforcement
- Reach
  - Information requirements
  - Restrictions
- POPs-regulation
- Toy safety directive
  - Flammability and chemical
- RoHS-directive
- Packaging & packaging waste directive
  - Metal content
- Biocide Product Regulation
  - Treated articles
- GPSD

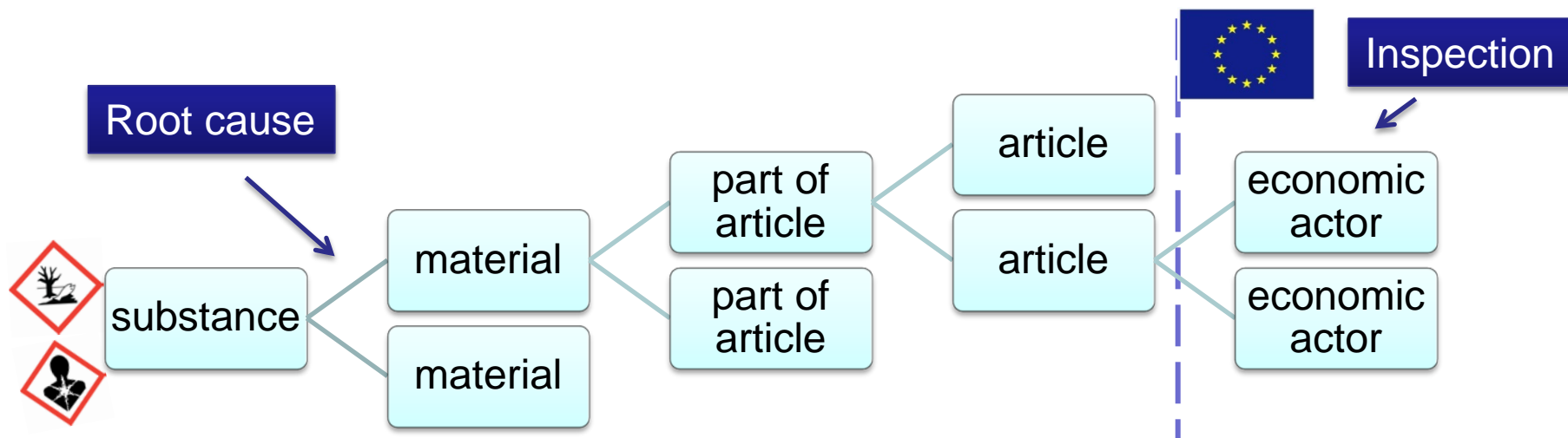


# Number of inspections and analysed articles

## Enforcement of articles



# Complex world – supply-chains...



- Many economic actors
- Large number of articles on the market – often short product life-cycles, e.g. fashion clothing

# Strategy for effective enforcement

- Criteria for prioritising groups of articles
  - risk to human health or the environment
  - probability of finding a dangerous substance in the article
  - possible to enforce
- Prioritised groups of articles
  - clothing, shoes and accessories
  - toys and other articles intended for children,
  - electrical and electronic equipment,
  - building products and furnishing
  - some more specific groups of articles
- Targeting economic actors
  - Cooperation with Customs, import statistics, structural business statistics, general internet searches, RAPEX, ICSMS, other market surveillance authorities, other authorities in the EU...





But...

“ *However beautiful the strategy,  
you should occasionally look at  
the results.*

**Winston Churchill**

# Kemi:s enforcement of articles in 2008-2013

Group of articles	Number of articles analysed	Percentage non-compliant*	Common causes for non-compliance
Toys	640	16 %	Phthalates, SCCP, Pb in electric
Childcare	52	4 %	Phthalates
Clothing, shoes, accessories	300	5 %	Azo-dyes, Pb, Cd
Flooring	44	0 %	-
Furniture	74	0 %	-
Oil lamps	11	100 %	design
Home electronics	330	13 %	Pb, brominated flame retardants
Other	130	7 %	SCCP, Cd

\* does not include when duty to inform was not fulfilled



# Experiences

- Inspections and chemical analyses necessary - but demanding in resources
  - Having results of an analysis of an article from the actor makes an on-site inspection more effective! – Certificates and assurances from supplier not always reliable
  - Face-to-face inspections bring us more understanding of the business segment/business environment
- Focussing on a few business segments at a time gives us
  - A better understanding of the business segment/article group
  - Better impact in the business segment
- Generally low awareness of chemical legislation/risks among economic actors – With many exceptions!

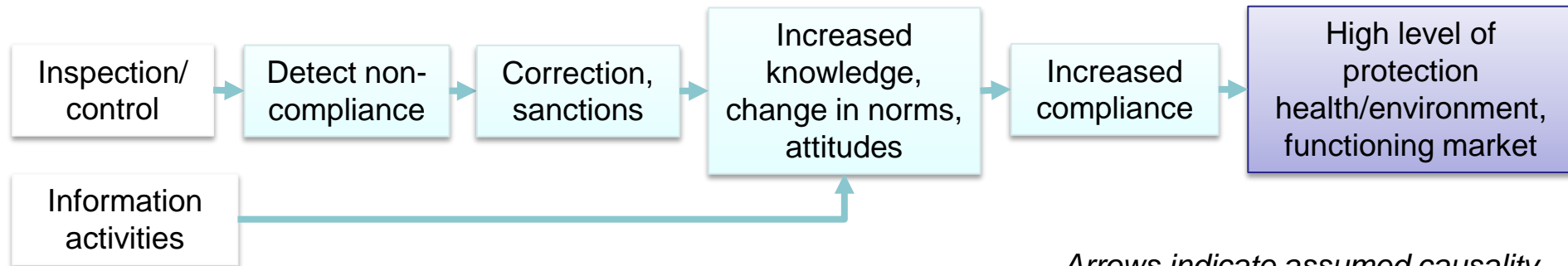


# How achieve our objectives?

*outputs*

*outcomes*

*objective*



*Arrows indicate assumed causality.*

- Inspections and chemical analysis
  - Necessary – but demanding in resources
- Maximize utility of each inspection/analysis

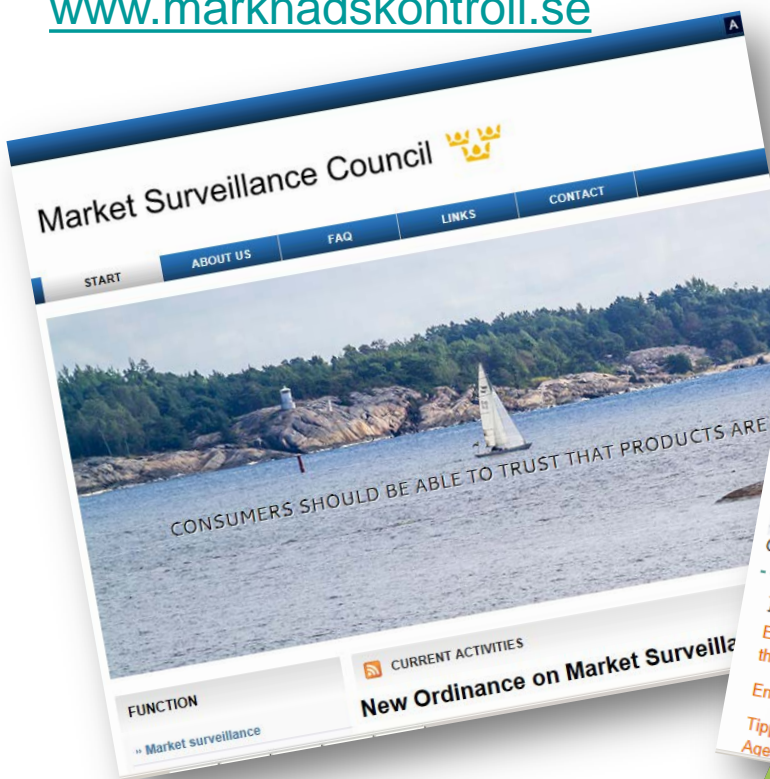
# Way forward

- Focus on objective – high level of protection health/environment and functioning market – not just controls/corrections/sanctions...
- Develop cooperation in EU-enforcement further
  - Cooperate when and where effective and efficient!
  - Reduce complexity?
    - Many product safety legislations
    - Forum, AdCOs, ProSafe...
    - Reporting, reporting...
    - Tools: RAPEX, ICSMS room for improvement
- Aim for the root cause, that the restricted substance is added in the first place
- Increase utility of inspections - improve our communication and coordinate with other activities to efficiently reach objectives
  - For example – addressed information well ahead of surveillance activity will have effect on actors not inspected

# Further information

[www.marknadskontroll.se](http://www.marknadskontroll.se)

[www.kemi.se](http://www.kemi.se)



Report in English on analyses in enforcement 2008-2013  
<http://www.kemi.se/Documents/Publikationer/Trycksaker/Tillsyn/Tillsyn6-14-Analyses-EN.pdf>

[www.kemi.se](http://www.kemi.se)

