

March 2019

Impose chemical requirements on your suppliers – tips to purveyors of articles

Chemicals legislation apply to all sorts of products, both chemical products and articles. This information is about what purveyors of articles should keep in mind.

As a purveyor of articles, you are responsible for ensuring that the chemical regulations are followed, even if you have purchased the articles from someone else and are only re-selling them. There are chemical regulations on

- the content of articles, such as chemicals that are banned
- what information you are required to give your customer.

Examples of articles and chemical products

Articles	Chemical products
Electronics, e.g., mobile phones, wrist watches, USB cables, lamps	Detergents, cleaning agents
Jewelry	Glue, paint
Bags	Insecticides
Textiles, e.g., clothing, bedding, towels	Animal shampoo, animal salves
Toys, e.g., stuffed animals, dolls, electric cars	Scented candles



Photo: Piya Saruittuawat



Photo: Elena Elisseeva



Photo: lofoto

In the chemicals legislation, mobile phone accessories, electrical products and textiles are some of the classes of merchandise that are referred to as *articles*. Chemical regulations also exist for these products. This fact sheet provides tips on what you can do to ensure that you follow the rules when selling articles.

Some advice

Depending on your role in the supply chain and on your supplier's knowledge of chemical regulations, you may use any of the following advice. *How* you should ensure that the requirements of the legislation are followed is not regulated in law. The important thing is that you make sure that they *are* followed.

- **Find out which chemical requirements apply to your articles.** You can start by going to the website of the Swedish Chemicals Agency, where you can review the guidance for manufacturers, importers and distributors of articles: www.kemi.se/en/companies. You probably will not be affected by everything, but your article may be covered by several different regulatory frameworks at the same time.
- **Impose specific chemical requirements on your suppliers.** Examples of requirements you can impose: 'Article X must be free of substances A, B and C, which are regulated in regulation Y' or 'The article must not contain substances on the candidate list in Reach'.
- **Chemical requirements = quality requirements.** Integrate chemical requirements with other quality requirements.
- **Do not impose overly general requirements.** Examples of requirements that are too non-specific: 'The article must fulfil Reach' or 'The article must comply with all relevant legislation in the country where the article is sold'.
- **Document everything in writing.** Document the requirements you impose in writing, along with the answers you receive from your suppliers.
- **Find out if the supplier has necessary knowledge.** To find out if your suppliers have necessary knowledge of the regulations, you can ask them some general questions. For example, you can ask how they are working to ensure compliance with the chemical requirements with respect to the article that they sell to you.
- **Develop routines.** Make sure that you have routines in place for imposing requirements on your suppliers, so that everything you intend to sell complies with the requirements of the legislation.
- **Ask for an analysis protocol.** If you deem it necessary, you can ask the supplier to demonstrate that the requirements are followed by, e.g., asking the supplier to provide an analysis protocol for the materials in the article.
- **Conduct sampling checks.** It is a good idea to conduct one's own sampling analyses every now and then, to verify that the articles comply with the requirements you imposed. One tip is to have a routine outlining which substances to look for in different types of materials.
- **Avoid substances on the candidate list.** If you avoid substances on the candidate list, you can easily reply to your customers if you have a question about those substances.
- **Remember what the CE mark means.** Remember that the CE mark is not a guarantee that all chemical requirements are met. CE marking only covers certain legislations.
- **Be vigilant when buying articles from outside the EU.** If you purchase articles from a non-European supplier, you may need to be extra vigilant, because the EU chemicals regulations do not apply outside the EU.
- **Enlist the help of others.** Enlist the help of trade associations or consultants if you yourself are unable to ensure the legal compliance of your articles.

- If you have questions about the content of your articles, you should contact your supplier.
- Stay up-to-date on new requirements by subscribing to our newsletter (in Swedish) www.kemi.se/en/news
- If you have questions about legislation, you are welcome to contact us www.kemi.se/en/helpdesk

Kemikalieinspektionen
Box 2, 172 13 Sundbyberg
+46-8-519 41 100

Visitor address:
Esplanaden 3A, 172 67 Sundbyberg

kemi@kemi.se
www.kemikalieinspektionen.se

The Swedish Chemicals Agency is supervisory authority under the Government. We work in Sweden, the EU and internationally to develop legislation and other incentives to promote good health and improved environment. We monitor compliance of applicable rules on chemical products, pesticides and substances in articles and carry out inspections. We review and authorise pesticides before they can be used. Our environmental quality objective is A Non-toxic Environment.

Article number: 511 317