



Retailer campaign AskREACH

Ingrida Bremere, BEF Latvia
Web conference: Simplified corporate communications about
SVHCs in articles
21 October 2021

The AskREACH approach to retailer campaign



Invitation &
setting the
scene

Awareness
materials
(leaflet), info-
days
(webinars)

Conversation
with the
retailer
(Interviews)

Targeted
meetings,
trainings of
staff at shops

Communication
with suppliers,
information
materials at
shops for
customers

- Retailers approached in more personalized manner
- Series of activities in implementation
- Interlinkage of company and consumers view-points

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Setting the scene

- Address and find interested retailers
- Various strategies in countries:
 - Personal approach by using contacts
 - Address through the professional associations, chambers of commerce
 - Organizing an event and inviting group of retailers with an aim to continue cooperation with interested ones
- Setting a meeting with retailer

Country specific approach!

Frontrunners provide valuable experience!

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But we face challenges....

- Internal coordination at large companies may be a challenge
- Lack of knowledge on chemicals, do not see the topic of SVHCs important and worth engaging
- Looks if they do not want to share what they are doing because they feel not doing enough
- Companies not willing to invest time and resources; not making customers aware of their right to information
- Retailers many times not interested in further actions – ‘What’s in it for us?’, mostly interested in positive PR
- Minimal pressure from consumers; no need to react



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Source: Feed-back information from AskREACH participating countries, September 2021

Awareness: Your shelves and Your clients

Retailers

Users of information

Managers

Purchase
decisions

Communicate with
producers/ suppliers

Information providers

Shop assistants

Know the shelves

Communicate with
customers

Right to know!

Retailers

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Substances in Articles are of Retailers Concern

2-page leaflet

- Background: chemicals added, and chemicals regulated (REACH)
- Chemicals communicated: REACH Art.33
- Communication approaches: on requests by consumers, pro-active and be prepared to fulfill the duty by making the article information available at-house

LIFE AskREACH, a project funded by the European LIFE programme, aims to simplify the communication of SVHC information in articles (check out www.askreach.eu).

Scan4Chem (Kemikaleappeni, Pytaji o'chemie, Tjek Kemien) is the smartphone app that was developed in **AskREACH**. Consumers can send SVHC requests through this app or – if article information is already stored in the database – receive the desired information directly.

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LIST

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CHEMICALS ADDED

The consumer desire:
To have articles certain properties, e.g., less flammable, non-sticky surface, water repellent textile, etc.

The consumer concern:
Harmful substances can be released from articles during their life-time and thus increase human exposure and leak to the environment.

The consumer protection request:
Consumers should be protected against harmful substances, especially those which are carcinogenic, mutagenic, or toxic for reproduction, are endocrine disrupting or are of high concern to the environment (e.g., very persistent, very bio accumulative).

Informing customers on the chemical content of an article and its safe use is a legal obligation and good communication practice for retailers!

CHEMICALS REGULATED

The European Union has a lot of legal acts regulating product safety and chemicals used in articles.

The central piece of legislation on chemicals is the European chemicals regulation (Regulation, Evaluation, Authorization and Restriction of Chemicals, **REACH**, [Regulation \(EC\) No 1907/2006](http://ec.europa.eu/chemicals/regulation/reach/reach_regulation_en)).

The REACH Regulation is adopted as a legislative umbrella to improve the protection of human health and the environment from the risks that can be posed by chemicals from a large range of industry sectors.

Particular attention is paid to substances of very high concern (SVHCs) that are defined to have one or several specific hazardous properties.

CUSTOMER INITIATED COMMUNICATION: THE RETAILER REACTS ON REQUESTS

Taking a reactive approach and seeking for the right information only when requested by a customer, you may be faced with an extensive and overwhelming task where time is limited. When a customer initiates communication by sending a request to you – the retailer – via letter, e-mail, or a smartphone app, your duty is to respond and care for the information. If the sufficient information on your articles is not in your possession, you need to request for the information from your own suppliers.

No information provided by your supplier	Insufficient information from your supplier	Sufficient information from your supplier
Possible reasons: • Article does not contain any SVHC (above the threshold) • Supplier does not have this information • Supplier is unaware of his duties or does not comply with these duties	Possible reasons: • Supplier takes a formal approach, e.g., "the article is REACH compliant" • Supplier is unaware of his duties or does not comply with these duties	Possible reasons: • Supplier has (i) stated the name of any SVHC substance in the article, (ii) provided sufficient information to allow safe use of the article or (iii) has confirmed that SVHC concentration is below 0.1% w/w
Activity by the retailer: Refused – rectify such information for specific articles, proactively seek for an answer	Activity by the retailer: Ask the follow-up questions and specify the request	Activity by the retailer: Use the information to respond to a request from a consumer

If the article (or individual parts of it) contains SVHCs above a concentration of 0.1% w/w, the name of this SVHC has to be communicated to the consumer. If SVHCs are below 0.1% w/w consumers also want to be informed so that they can make their purchase decision on that basis.

RETAILERS INITIATED COMMUNICATION: PRO-ACTIVE APPROACH

Setting contractual agreements with your suppliers	Make article information available in your suppliers
As a retailer you can explicitly include the communication as part of the contract between you and your suppliers. Specific contractual clauses may refer to: • Obligation to provide information on substances in articles, particularly on SVHC • Request for an evidence of correctness of information on substances in articles • Purchase only articles which contain SVHCs below 0.1% w/w	As a retailer you may encourage your suppliers to submit their information to the AskREACH database: • For making it readily available to all European Scan4Chem smartphone app users. • Rapid upload options are available for extensive article portfolios • Submitters can be made for all articles, whether they contain SVHCs or not (https://www.askreach.eu/app-database/)
Benefits for the retailer: Prepared in-house information to fulfil your legal obligations on communication	Benefits for the retailer: Automatic responses to customers to fulfil your communication obligations

As a supplier of articles, you have the duty to communicate information on substances in the article you sell even if you have purchased the article from someone else and are only re-selling them. Re-directing the consumer to the producer or importer of the article is not sufficient! You are responsible for the articles you sell. Consumers are expecting an answer from the retailer!

The communication obligation

Even if you have purchased the articles from someone else and are only reselling them → you are also responsible for ensuring the communication

Strategies to select:

- Customer initiated communication → the retailer reacts on requests
- Retailers initiated communication → be prepared to fulfill the duty by making the article information available at-house

Your customer expects answer on substances of very high concern (SVHC) in the article!

Selection of a strategy to answer is up to you!

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Retailer sets the contractual agreements

As a retailer you can explicitly include the communication as part of the contract between you and your suppliers

Specific contractual clauses may refer to:

- Obligation to provide information on substances in articles, particularly SVHCs
- Request for an evidence of correctness of information on substances in articles
- Purchase only articles which contain SVHCs below 0.1% (w/w)

Prepared in-house information and an evidence of correctness of information to fulfill your legal obligations on communication

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Ask for article information in the database

As a retailer you may encourage your own suppliers to use an option to submit their article information to the AskREACH database

Specifics may refer to:

- For making it readily available to all European Scan4Chem smartphone app users
- Rapid upload options are available for extensive article portfolios
- Submissions can be made for all articles, whether they contain SVHCs or not



Automatic responses to customers to fulfill your communication obligations

Encourage your suppliers to upload data



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Call to article suppliers to register in the AskREACH database

The EU REACH Regulation¹ requires suppliers of articles to communicate information about Substances of Very High Concern (SVHCs) in the supplied articles.

According to REACH Article 33(2), suppliers of articles have to inform consumers about SVHCs contained at a concentration above 0.1% weight by weight (w/w) in these articles or in component parts and also in the packaging. Suppliers have to provide sufficient information, as available to them, to allow the safe use of the article, including at minimum, the name of the SVHC.

LIFE AskREACH, a project funded by the European LIFE programme, aims to simplify the communication of SVHC information (check out www.askreach.eu). You are invited to submit your article information to the database of the AskREACH project, making it readily available to all European AskREACH smartphone app users. Submissions are possible for all articles, whether they contain SVHCs or not.

On the AskREACH project website (<https://www.askreach.eu/app-database/>), you can find out how to register with the database and create your company profile, as well as how to upload your article data. For extensive article portfolios, rapid upload options are available (bulk upload, barcode range declaration). Information in the database will allow immediate responses to customers and fewer resources will be necessary to fulfil your legal obligations, while guaranteeing that the correct information is delivered. Through the database you also have the opportunity to promote SVHC-free articles.

[Senders name] recommends the [its supplier] companies use the database as a tool to comply with REACH Article 33(2).

Even if you do not wish to provide your company's SVHC article information to the database, it is still a good idea to create a profile with your contact information and the barcode prefixes your company owns (GS1 GPC codes). In this way you can make sure that all the information requests about articles you sell or produce are sent to the correct e-mail address.

You are welcome to contact me for additional information by e-mail (xxx) or by phone (xxx). For assistance with the database, you can also contact any of the AskREACH regional administrators (regional contacts: <https://www.askreach.eu/app-database/>).

Best regards,

(Name of person in charge at AskREACH partner)
(function of that person)
(e-mail address of that person)
(telephone number of that person)

¹ Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC.

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Focus



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Communication obligation

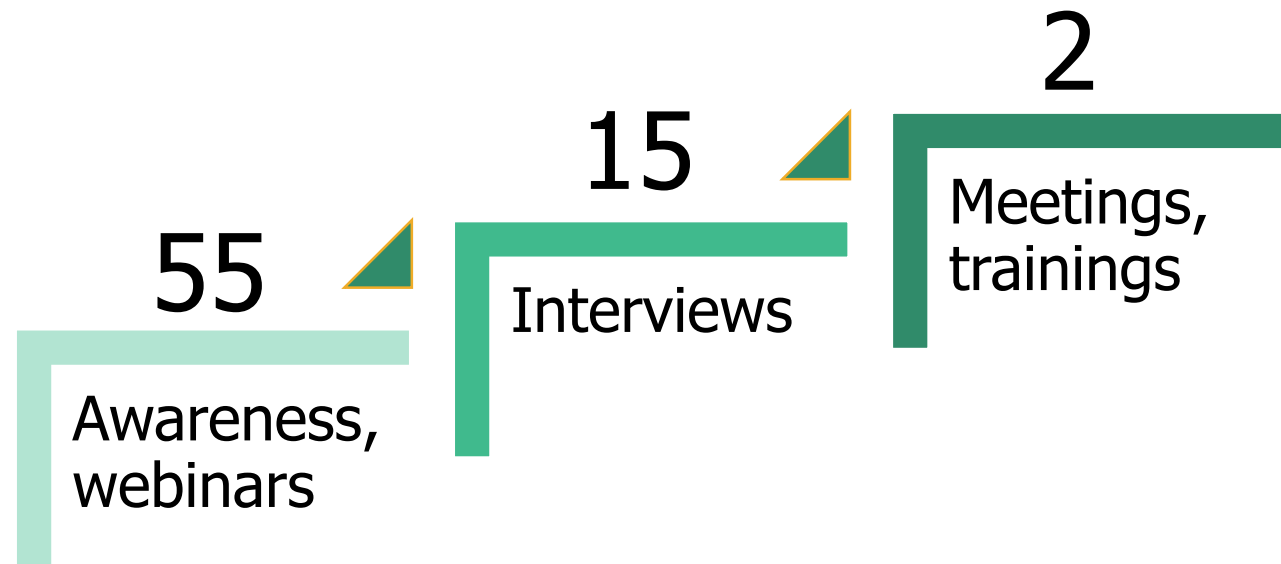
About the AskREACH

How to register

Invite to create a profile, if they do not wish to provide company's SVHC article information to the database

Contact information

Status of retailer activities



Indicative reflection on success of engagement (by Sep., 2021)

Success - activities are well appreciated content wise

We highly need interested retailers to engage – work by end of 2022!

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Good idea to start,
when a retailer
receives a lot of
requests

Retailers had an
interest to be involved
in educational
activities relevant for
their business

Retailers seemed to
give honest and frank
answers to our
questions

Trainings turned out
to be very interesting
& valuable to
participating retailers

Targeted attempts &
focus on certain
sectors of interest of
the retailers

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Source: Feed-back information from AskREACH participating countries, September 2021

Thank you for your attention!

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