

Raising Awareness on Health Hazards of Phthalates in Toys

Elements of SAICM Covered: project on chemicals in products (CiP), in line with the SAICM objective 2 (strengthening knowledge and information)



IPEN Chemicals in Products Initiative (ICiPI)

Armenian Women for Health and Healthy Environment



Author: Armenian Women for Health and Healthy Environment

Country: Armenia

IPEN Region: EECCA

Contact: Elena Manvelian, office@awhhe.am

Title of project: Raising Awareness on Health Hazards of Phthalates in Toys

Elements of SAICM Covered: project on chemicals in products (CiP), in line with the SAICM objective 2 (strengthening knowledge and information)

Specific products and chemicals related to the activity (including the number of toys purchased, chemicals analysed, standards used for toxic metals and phthalates):

In December 2018, AWHHE studied labels of 56 toys in 9 sales points in Arabkir, Nor Nork and Kentron communities in Yerevan.

The project was implemented in the frame of IPEN's Chemicals in Products (CiP) programme (<https://ipen.org/site/toxics-products-overview>) with the objective to understand whether consumers are informed about the composition of toys, with a particular focus on phthalates.

Similar IPEN-supported projects are taking place in Belarus, Serbia, Nepal and the Philippines. The picture is disappointing - consumers are deprived of the right to choose, because even the most basic information about what the toy is made of, what chemicals it contains is missing.

Toxic effects of the chemicals contained in the products:

Heavy metals: cadmium, lead, arsenic, chromium (VI), mercury

Chemical	Use	how consumers are exposed	Toxic effects
Cadmium (Cd)	Used in paints to cover plastics	respiratory or digestive system (e.g. when burning plastics objects, it is released into the air)	<ul style="list-style-type: none">• kidney inflammation,• nervous system disorders;• lung emphysema,• bone pains, skeletal deformation, osteoporosis• Hypertension, cardiopathy,• Anemia,• Sexual function disorders (prostatopathy);• Lung and kidney cancer,• Deficiency of zinc, selenium, copper, iron, calcium.
Lead (Pb)	Paints, plastic jewelry	respiratory system (breathing dust) and the digestive tract (when dusty hands or toys are placed on the mouth)	<ul style="list-style-type: none">• irritability, weakness, fatigue, memory loss, migraine, mental retardation, depression, concentration loss,• muscle pain in limbs;• appearance of lead on the gums - dark blue or black,• dental caries, bone disease,• increase of arterial pressure, atherosclerosis, bradycardia (decreased heart rate),• sharp belly pain, constipation,

			<ul style="list-style-type: none"> • weight loss, • renal insufficiency, neuropathy, • anemia • decreased resistance to infections; • reduction of calcium and zinc content in the body
Arsenic (As)	In solutions used to prevent decay of wooden articles		<ul style="list-style-type: none"> • irritability, headaches, • liver function disorder; • skin allergic inflammations (eczema, dermatitis, ulcers, peripheral dermatitis, etc.), eye inflammation (conjunctivitis), • kidney infections (neuropathy); • increased risk of developing skin, liver, lung cancers • disorders of the respiratory tract (nasal septum perforation); • damage to blood vessels.
Chrome (Cr)	Chromium Salt ($\text{Na}_2\text{Cr}_2\text{O}_7$) sodium bicromate is used in the chemical, textile and leather industry as a tanning substance. Chromium compounds are also used in the production of glass, rubber, ceramics.		<ul style="list-style-type: none"> • skin allergic inflammations (allergic dermatitis, eczema), • bronchial asthma, • irritability (astheno-neurotic disorders), • increased risk of neoplasms; • intestinal lining inflammation.
Mercury (Hg)	contained in electric toys batteries and cosmetics, jewelry (especially gold)	digestive system (when putting hands or toys in mouth) or applying to the skin	<ul style="list-style-type: none"> • mental disorders, headaches, irritability, anxiety, tiredness, • visual and hearing impairment; • tremors of hands, eyelids, lips and body; • skin inflammation (mercury toxic dermatitis, sometimes hemorrhagic rash), hair loss, damaged nails, • "mercury" stomatitis, inflammation of the oral cavity (swelling, erosions, ulcers), gum inflammation, red rash on gums, • ulcers in the stomach and intestines, thickened neck (necrosis), diarrhea, abdominal pain, • inflammation of the kidneys (nephroszonephritis), urinary dysfunction, sometimes anuri); • anemia, • tachycardia (fast heart beating); • fever

Phthalates

By penetrating the organism, phthalates lead to:

- decreased resistance of the body's immunity, weakened protective properties
- disorders of various organs: liver, kidneys, pancreas, genital organs, heart, vessels, brain (neurotoxic)
- fatty acne and metabolic disorders,
- obesity, diabetes,
- in women: breast, uterus and ovarian cancer (endocrine disrupting effects);
- in men: decrease of sperm development, infertility, cancer of the colon.
- In children: can lead to obesity, growth and development disorders, irreversible changes in immune and nervous systems

How consumers are exposed to phthalates:

Phthalates can be released from the finished items and penetrate the baby's body, especially when chewing or sucking those items. Thus, phthalates from plastic toys can be absorbed into the human body by means of gastrointestinal tract. These items include teething rings, bottle nipples, soothers, etc. Phthalates can be released from the phthalate-containing soaps, shampoos, hair gels, bath toys, inflatable toys, rescue rings and inflatable rescue life jackets and absorbed into the human body through the wet skin. Children, especially very small ones, often put flexible plastic toys into their mouths.

Phthalates can be released from a product by heat, agitation, and prolonged storage. The release can occur during all the stages of the product lifecycle - from production, through use, to disposal. The number of these products is incommensurable. People most often are exposed to phthalates through food plastic containers. Under certain conditions of use phthalates are released from products and absorbed into the body through food.

Although several types of phthalates were banned from use in children's toys in the US, Canada, the EU and the EEU, these toxic endocrine disrupting chemicals (EDCs) can be found in many children's items, including lunch boxes, waterproof mattress covers, inflatable toys, baby pools, and bath toys.

Description of legislation that regulates labeling of products, and the regulation of phthalates in products.

a. International

The International Council of Toy Industries (ICTI) lists International Standards for Toys and Children's Products as identified and maintained by the U.S. Toy Industry Association in its role as ICTI Secretariat (ref. <https://www.toy-icti.org/info/toysafetystandards.html>)

As of December 2017

Country	Title	Contact to Inquire or Obtain Standard
International Standards	<p>ISO/TC 181 Safety of Toys</p> <p>ISO 8124-1:2014 Safety of Toys—Part 1: Safety Aspects Related to Mechanical and Physical Properties</p> <p>ISO 8124-2:2014 Safety of Toys—Part 2: Flammability</p> <p>ISO 8124-3:2010 Migration of Certain Elements</p> <p>ISO 8124-4:2014 Swings, slides and similar activity toys for indoor and outdoor family domestic use</p> <p>ISO 8124-5:2015 Determination of total concentration of certain elements in toys</p> <p>ISO 8124-6:2014 Certain phthalate testers in toys and children's products</p> <p>ISO 8124-7:2015 Requirements and test methods for finger paints</p> <p>ISO/TR 8124-8:2014 Age determination guidelines</p> <p>IEC 62115:2017 Electric Toys—Safety</p>	<p>International Organization for Standardization ISO Central Secretariat BIBC II Chemin de Blandonnet 8 CP 401 1214 Vernier, Geneva Switzerland E-mail: central@iso.org Tel. : +41 22 749 01 11</p> <p>ISO Regional Engagement - Asia, Singapore office 2 Science Park Drive #02-05/06 Singapore 118222 E-mail: singapore@iso.org Tel. : +65 6265 1023</p> <p>Website: www.iso.ch Available in English</p> <p>International Electrotechnical Commission for IEC 62115 3, rue de Varembé, P.O. Box 131 1211 Geneva 20 Switzerland E-mail: info@iec.ch Tel : + 41 22 919 02 11</p>

b. EU

The European Commission has announced plans to restrict the placing on the market of articles containing four phthalates – DEHP, DBP, BBP and DIBP – following their identification as substances of high concern due to endocrine disrupting effects on humans and the environment. These chemicals, Bis(2-ethylhexyl) phthalate (DEHP), Benzyl butyl phthalate (BBP), Dibutyl phthalate (DBP), and Diisobutyl phthalate (DIBP), are commonly present in plasticised materials and found in a wide variety of everyday products, from toys to sport equipment.

Consumers can be exposed to one of these phthalates or to their combination through different sources, such as ingesting food and dust, placing articles in the mouth, breathing in air and dust indoors, and by dust coming into contact with mucous membranes and skin.

The chemicals are known for their [toxic effects on reproductive health](#).

Under the new restriction, the four phthalates may not be present in articles used by consumers or available in indoor areas in a concentration equal to or above 0.1% by weight individually or in any combination in any plasticised material.

The restriction proposal takes into account the cumulative effects and combined exposure to the four phthalates from different products.

The EU's REACH Committee, composed of experts from all member states, supported the proposed measure by unanimity.

The Commission's restriction plan comes almost seven years after the Danish government submitted a proposal to the European Chemicals Agency (ECHA) to restrict the four phthalates. However, the proposal was rejected by the ECHA in 2012, which claimed at the time that the use of the chemicals did not pose a risk.

In 2015, Denmark resubmitted this proposal, which was [finally approved by the ECHA and green lighted by the EU REACH Committee in 2016](#).

Commenting on the Commission's decision to restrict the four phthalates, Natacha Cingotti, senior policy officer at campaign group Health and Environmental Alliance, told ENDS: "We are pleased to see that the European Commission has rubber stamped this proposal. However, we do regret that it has taken such a long time for this to happen.

"Nevertheless, this is a positive step forward for health protection. Looking forward, we do hope that the Council and the European Parliament give a green light to this proposal."

The EU Council and Parliament will now have three months to scrutinise the measure before its adoption by the Commission.

The restriction will then be published in the Official Journal of the EU and will apply 18 months after the entry into force to products produced both in and outside of the EU.

c. Eurasian Union

The Eurasian Economic Commission has the following technical regulations related to children's products:

- "On safety of products intended for children and adolescents (TR CU 007/2011) http://www.eurasiancommission.org/ru/act/tehnreg/deptexreg/tr/Documents/P_797_1.pdf ;

- "On the safety of toys" (TR CU 008/2011) <http://www.ccis-expertise.com/pdf/cu-tr-008-2011.pdf>
Both, TR CU 007/2011 and TR CU 008/2011 contain the requirements on labeling.

The regulations regarding safety of products for children (TR CU 007/2011, Article 9) contain the following requirements on labeling (among others):

1. Product labeling must be reliable, verifiable, readable and accessible for inspection and identification. Product labeling is applied to the product, a label attached to the product or product label, product packaging, product group packaging or package insert.

2. Product labeling should contain the following information:

- name of the country where the products are made;
- name and location of the manufacturer (authorized by the manufacturer), importer, distributor;
- name and type (purpose) of the product;
- date of manufacture;
- single sign of circulation in the market;
- product service life (if necessary);
- warranty period (if necessary);
- trademark (if available).

3. Information must be provided in Russian or the state language of the Member State of the Customs Union in which this product is produced and sold to the consumer.

For imported products, the name of the country where the products are manufactured is allowed. The name of the manufacturer and its legal address shall be indicated using the Latin alphabet.

4. It is not allowed to use the instructions "ecologically clean", "orthopedic" and other similar instructions without a corresponding confirmation.

However, there is no requirement regarding information about chemical composition.

The regulations regarding safety of products for children (TR CU 008/2011, points 5 and 6 of Article 4 Safety Requirements) contain the following requirements on labeling:

5.1. Labeling of toys must be reliable, verifiable, clear, easy to read, accessible and for inspection and identification.

5.2. The labeling is applied by the manufacturer (the person authorized by the manufacturer) and the importer.

The place and method of labeling is determined by the manufacturer (the person authorized by the manufacturer) and the importer.

5.3. Labeling should contain the following information:

- name of the toy;
- name of the country where the toy is made;
- name and location of the manufacturer (authorized by the manufacturer), the importer, information to communicate with them;
- manufacturer's trademark (if any);
- the minimum age of the child for which the toy or pictogram is intended, indicating the age of the child;
- the main construction material (for children up to 3 years) (if necessary).
- ways to care for a toy (if necessary);
- date of manufacture (month, year);
- service life or shelf life (when established);
- storage conditions (if necessary).

5.4. Depending on the type of toy, the contents of the label include: completeness (for sets), rules for using the toy, hygienic care, safety measures when handling the toy, warning labels, assembly instructions.

The warning information should contain an indication of special precautions when used in accordance with Annex 3 of these technical regulations of the Customs Union.

6. Labeling and technical documentation supplied with the toy are performed in Russian and in the state language (s) of the Customs Union member state, if there are relevant requirements in the legislation (s) of the state (s) of the member (s) Customs Union.

Annex 3 contains detailed labeling requirements, including those related to chemicals (point 4):

4. A chemical toy must have operational documents containing hazardous substances and reagents, instructions regarding the dangers of their use and the need for users to take precautions. The operational documents should contain information on first aid, as well as an indication of age-related addressing.

In February 2018, Eurasian Economic Commission (EAC) adopted a plan of action for implementation of the Memorandum of Understanding between the EAC, EU Committee on Standardization and EU Committee on Standardization in Electronics for the period 2018-2022. One of the issues included in the plan of action (under point 7) is cooperation on the issues of synchronization of approaches between EAC and EU Directives on control of contents of phthalates and other hazardous substances in the consumer products, building materials, packaging, etc. (ref. https://docs.eaeunion.org/docs/ru-ru/01016914/clco_12022018_24)

d. National, Republic of Armenia

Provisions are made on labels in the Decision of the Government of the Republic of Armenia on Approving the Technical Regulation of the Security Guidelines and Recognizing the Resolution of the Government of the Republic of Armenia N 1551-N in November 2004 (<https://www.arlis.am/DocumentView.aspx?DocID=89353>)

Point 5 of the above decision provides for label information (below is unofficial translation):
5. The information provided to a consumer on a specific product shall contain the following information:

- a) the name of the product;
 - b) country of origin;
 - c) the name of the producer organization (firm);
 - d) the main (or operational) meaning of the product or its application;
 - (e) the procedures and conditions for safe storage, transportation, safe and efficient use, repair, rehabilitation, clearance and destruction if necessary;
 - f) main consumer properties and characteristics;
 - g) information on conformity assessment;
 - h) the manufacturer's location;
 - i) the price and purchase conditions of the product;
 - j) the warranty period (if such is stipulated by the law);
 - k) the marks of the normative documents, which must meet the requirements of the goods;
 - l) information on possible consequences of consumers' actions after the expiration of the specified terms and the failure to perform such actions, if the goods expire after the expiration of the specified term, for use in the life, health and property of the consumer or for their use are useless.
 - m) information on the rules of commodity purchase and sale;
- By the type of product concerned the manufacturer (or seller) may provide the consumer with other information.

Provisions are made also in the Decision of the Government of the Republic of Armenia No. 1923-N of 7 November 2002 on the Establishment of the Procedure for The Consumer on Information Content and Mandatory Requirements of Separate Types of Products (Works, Services) (<https://www.arlis.am/DocumentView.aspx?docid=10346>)

Armenia as member of the Customs Union, follows the regulations contained in TR CU 007/2011 and TR CU 008/2011 (including the requirements described in Annex 3 of TR CU 008/2011 on chemical composition).

Phthalates regulated in EAC

According to regulation of the Customs Union on “On the safety of toys”, the following sanitary-chemical indicators for toys are used (ref. Table 1 of point 4 in Annex 2 to TR CU 008/2011):

4.1. The level of migration into the model environment (water, air) of harmful chemicals from toys should not exceed the standards specified in Table 1.

Name	Name	Level of migration	Level of migration
Materials, products	identifiable harmful substance	Aquatic environment (mg/Nm ³), no more than	air (mg/m ³), no more than
Polyvinyl chlorides	dibutyl phthalate **	Not allowed	Not allowed
	dimethyl phthalate	0,3	1,007
	dioctyl phthalate	2,0	0,02
	diethyl phthalate	3,0	0,1
Polyethylene terephthalate	dimethyl terephthalate	1,5	0,01
Rubber-latex compositions	dimethyl phthalate	0,3	0,007
	dibutyl phthalate **	Not allowed	Not allowed
	dioctyl phthalate	2,0	0,02
	diethyl phthalate	3,0	0,01

** It is not allowed in quantities exceeding the values corresponding to the lower limit of detection of these harmful substances according to the measurement procedures approved for the control of sanitary and chemical indicators.

National regulation of phthalates in products

In Armenia (as member of EAU), only one phthalate – DIBUTIL PHTHALATE – is prohibited. The table below shows that there is danger that some phthalates, which are not banned/restricted in the country of origin, may enter the national market.

Summary of phthalate regulations in USA, Canada, EU and EAU

No	Phthalate name	Abbreviation	USA	Canada	EU	EAU
1	di iso nonyl phthalate	DINP				
2	di-n-pentyl phthalate	DnPENP				
3	di-n-hexyl phthalate	DnHEXP				
4	di cyclo hexyl phthalate	DCHP				
5	di iso butyl phthalate	DIBP				
6	di-(2-ethyl hexyl) phthalate	DEHP				
7	di butyl phthalate	DBP				
8	benzyl butyl phthalate	BBP				
9	di-n-octyl phthalate	DnOP				
10	di-iso-decyl phthalate	DIDP				
11	di-n-butyl phthalate	DnBP				
12	di-n-hexyl phthalate	DnHP				
13	diethyl phthalate	DEP				
14	dimethyl phthalate	DMP				
15	dimethyl terephthalate	DMT				

	Restriction on the concentration of phthalates that are used in toys which the child puts to mouth (teeters, etc.)
	Restriction on the concentration of phthalates for toys other than those designed to be put to mouth
	Ban on use of the phthalate in toys
	Discussion on restrictions/ ban underway

How product waste containing the hazardous chemicals is handled and the legislation that regulates this type of waste:

All issues related to waste are regulated by The Law of the Republic of Armenia on Waste, 2004: <https://www.arlis.am/documentview.aspx?docid=1722> (unofficial translation into English: http://procurement-notice.undp.org/view_file.cfm?doc_id=160529)

Revision of 22.06.2015: <https://www.arlis.am/DocumentView.aspx?DocID=99187>

Revision of 21.03.2018: <https://www.arlis.am/DocumentView.aspx?DocID=120749>

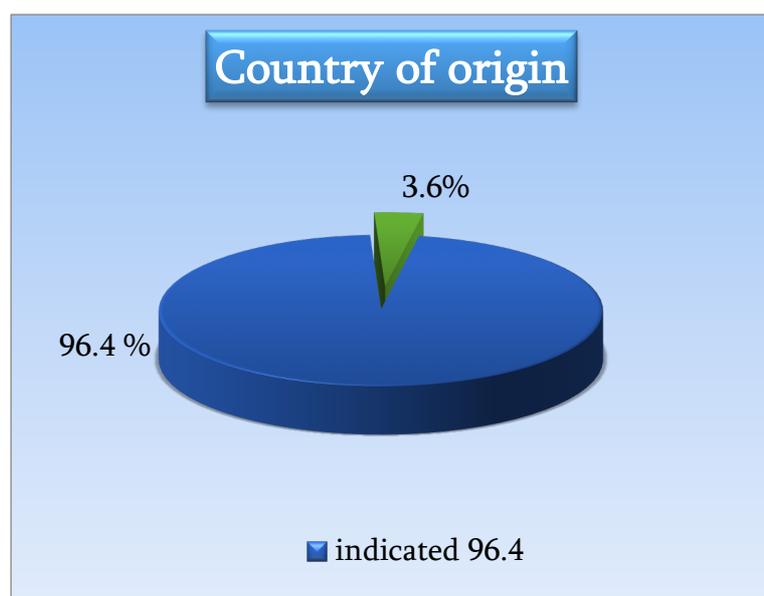
The legislation does not provide specifically for waste containing phthalates (all household waste, toys and other consumer products are disposed of and transported to landfills).

Information available to consumers about the toxic chemicals in the product:

The AWHHE study of labels in stores showed that toys with the unknown composition are sold in the Armenian market, which can endanger children's health. We studied labels of 56 toys in 9 sales points in Arabkir, Nor Nork and Kentron communities and found out that 91% of the toys have been imported from China. In the case of 78.6% of toys, the names of the substances used in toys are not mentioned in the labels; 43 of the toys (76.8%) out of 56 do not specify the name of the producer / manufacturer; brand name information was missing on 40 toy labels; barcode was not indicated on 13 labels.

Country of origin

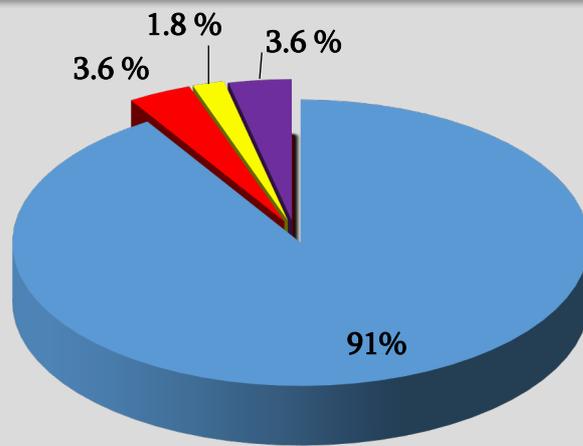
Country of origin	quantity of toys	%
indicated	54	96.4
not indicated	2	3.6



The names of countries of origin

The names of countries of origin	quantity of toys	%
China	51	91.0
Russia	2	3.6
Belarus	1	1.8
Of unknown origin	2	3.6

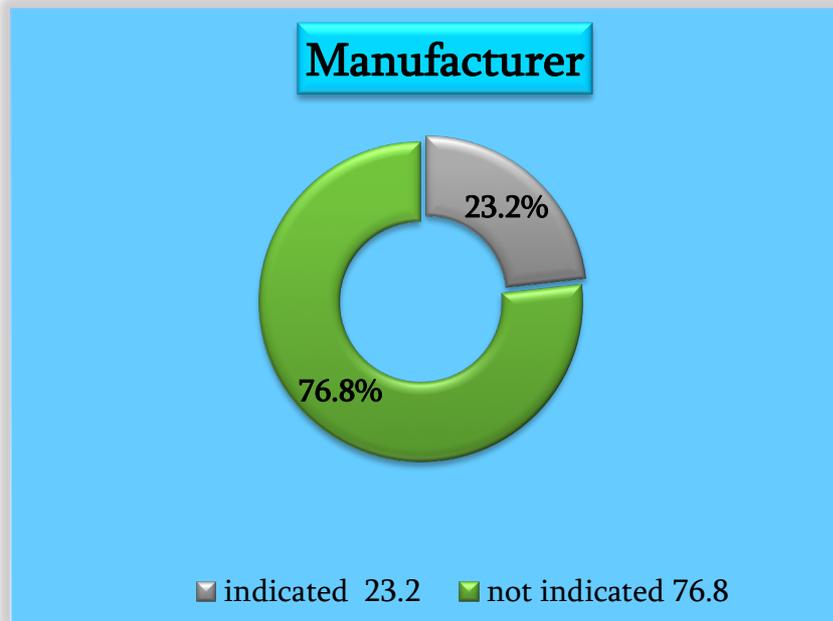
The names of countries of origin



■ China 91.0 ■ Russia 3.6 ■ Belarus 1.8 ■ Of unknown origin 3.6

Manufacturer

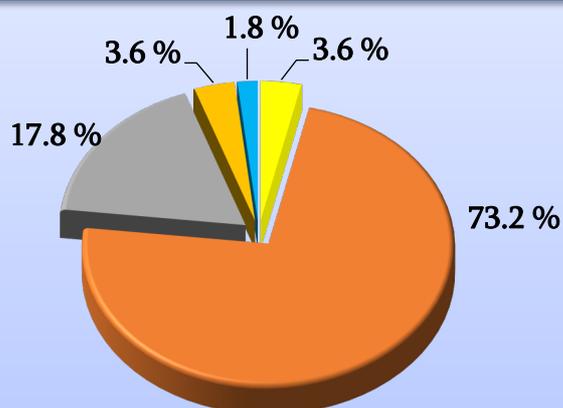
Manufacturer	quantity of toys	%
indicated	13	23.2
not indicated	43	76.8



The manufacturers by countries

The manufacturers by countries	quantity of toys	%		%
Both the country of origin and the manufacturer are unknown	2	3,6	the manufacturer are unknown	76.8
China; manufacturer is unknown	41	73,2		
China; manufacturer is known	10	17,8	the manufacturer are known	23.2
Russia; manufacturer is known	2	3,6		
Belarus; manufacturer is known	1	1,8		

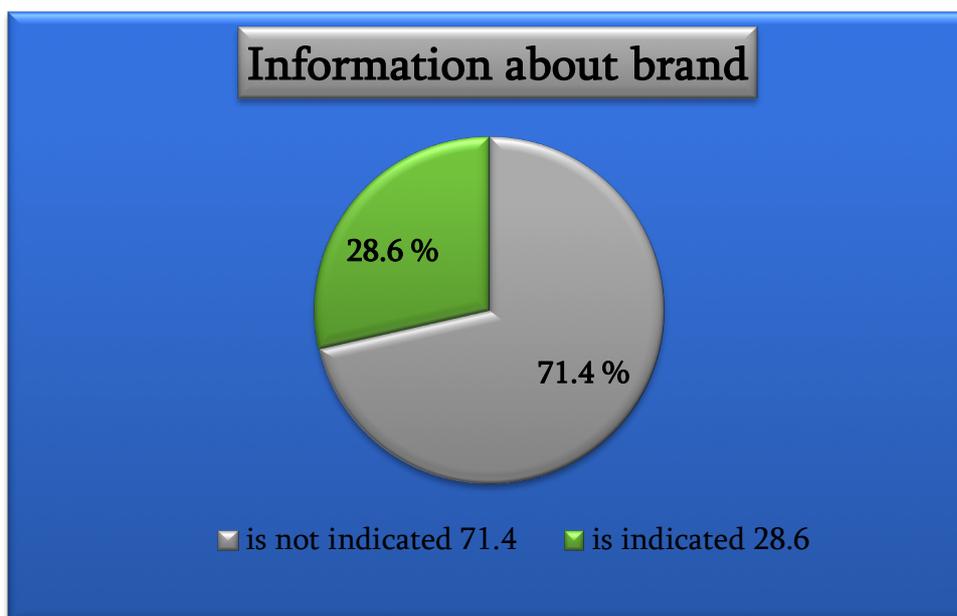
The manufacturers by countries



- Both the country of origin and the manufacturer are unknown 3.6
- China; manufacturer is unknown 73.2
- China; manufacturer is known 17.8
- Russia; manufacturer is known 3.6
- Belarus; manufacturer is known 1.8

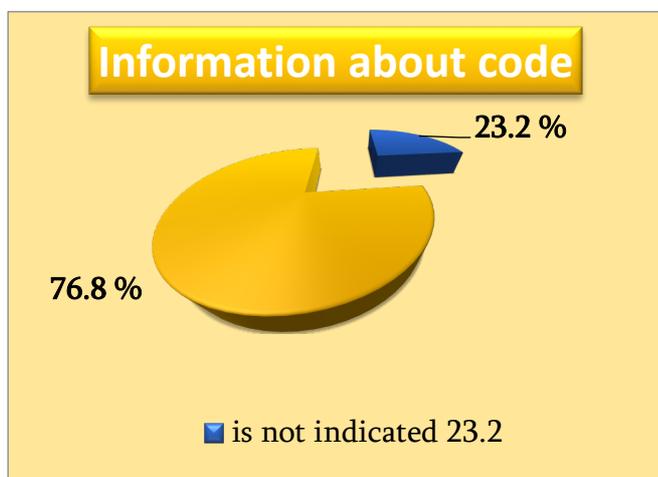
Information about brand

Brand	quantity of toys	%
is not indicated	40	71.4
is indicated	16	28.6



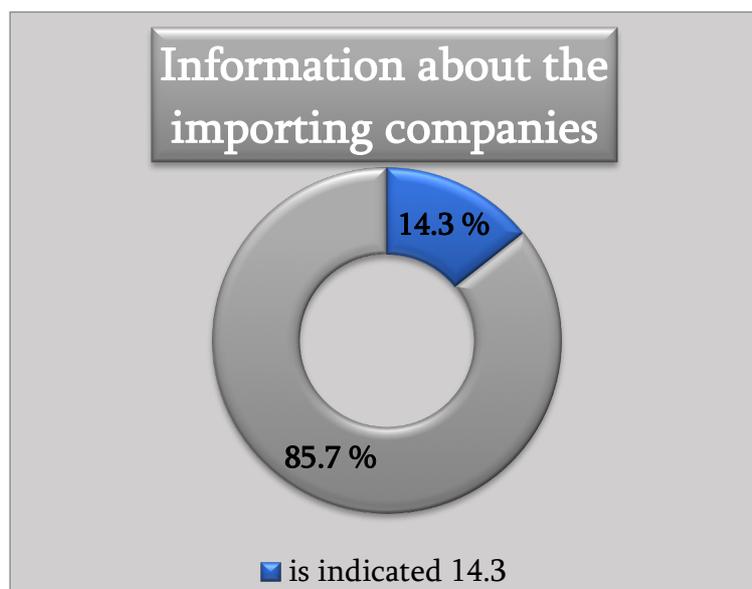
Information about code

Code	quantity of toys	%
is not indicated	13	23.2
is indicated	43	76.8



Information about the importing companies

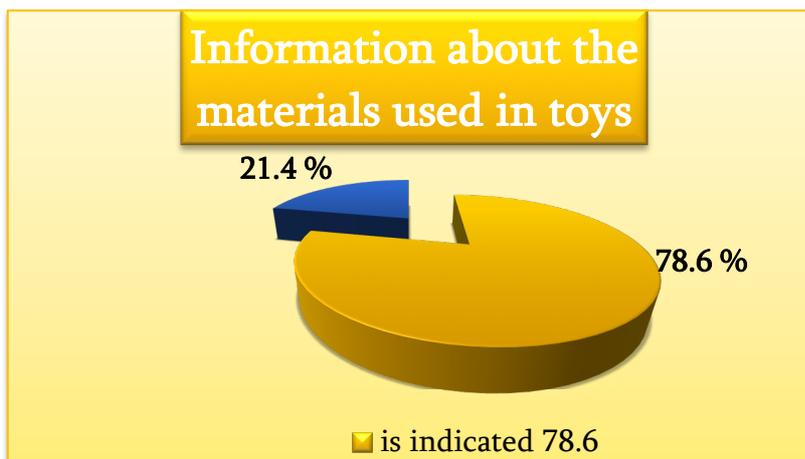
Information about the importing companies	quantity of toys	%
is indicated	8	14.3
is not indicated	48	85.7



Information about the materials used in toys

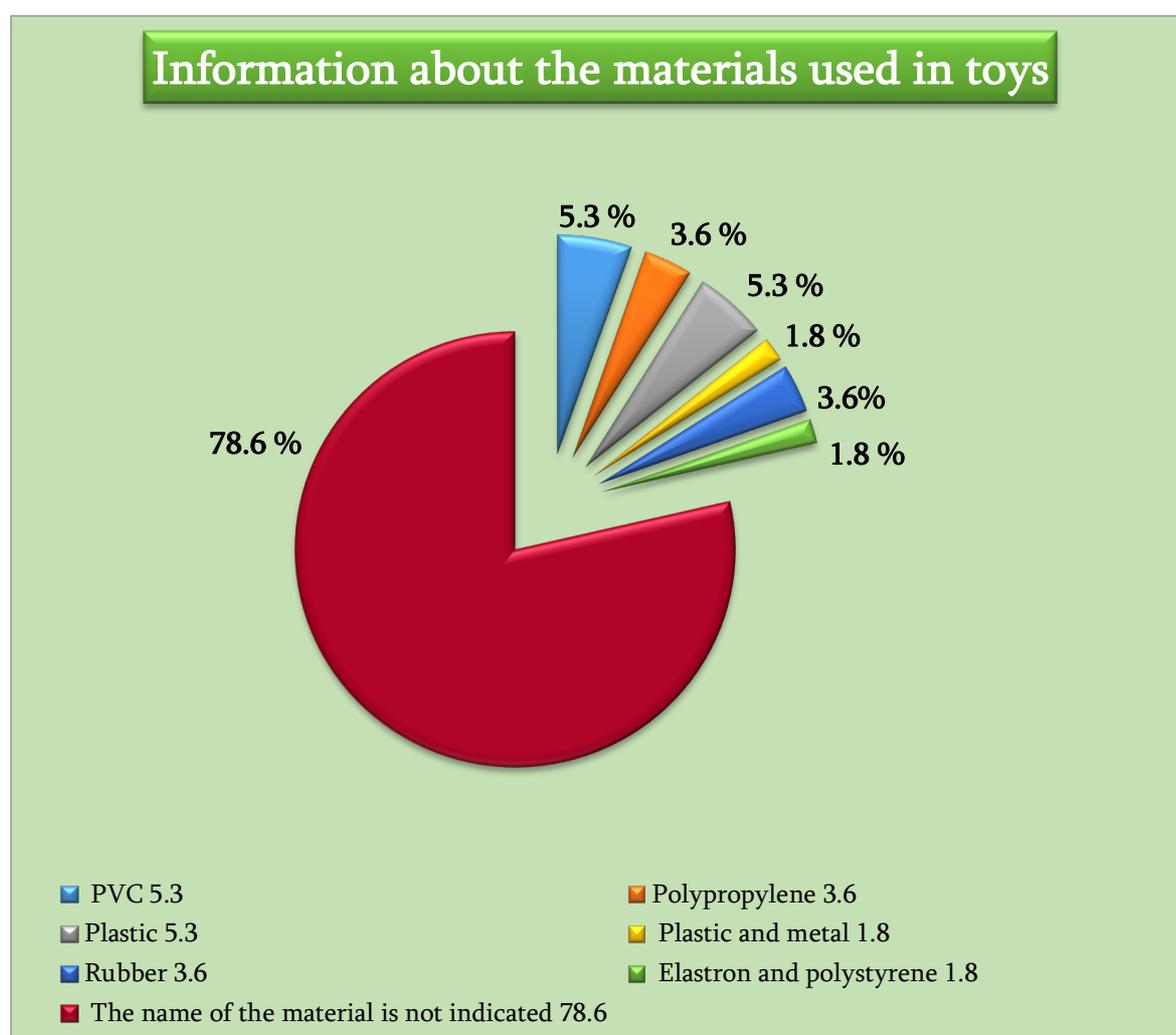
None of the product sample contained information about chemicals used in products, including plastic additives like phthalates and others.

Information about the materials used in toys	quantity of toys	%
is indicated	44	78.6
is not indicated	12	21.4



Information about the materials used in toys

The name of material	quantity of toys	%
PVC	3	5.3
Polypropylene	2	3.6
Plastic	3	5.3
Plastic and metal	1	1.8
Rubber	2	3.6
Elastron and polystyrene	1	1.8
The name of the material is not indicated	44	78.6



Types of similar products available on the market, including safer alternatives:

Since the product information is generally not complete, it is difficult to judge about availability of safe alternatives.

Project Outcomes: Activities conducted, including methods (number of toys purchased, methods of analysis on heavy metals and phthalates used):

Summary of conducted activities and project outcomes:

1. Using the data available from the **Greenpeace Fair Toys project** and other relevant data, AWHHE conducted analysis on the situation related to the awareness of national agencies and mass media in the CiP programme. Below is brief outline of AWHHE participation in the Fair Toys Project by Greenpeace-Russia.

According to a recently published report by Greenpeace-Russia on the results of analysis of toys for presence of ten most common types of phthalates (ref. Нечестная игра: почему игрушки могут быть опасны для здоровья детей? (<http://fairtoys.org/assets/doklad.pdf>), phthalates were found in all 16 toy samples purchased in countries of Eastern Europe, Caucasus and Central Asia (EECCA). The following NGOs from the Eastern Europe, Caucasus and Central Asia (EECCA) region participated in the study: Eco-Accord (Russia), Center for Environmental Solutions (Belarus), Independent Ecological expertise (Kyrgyzstan), the Human Health Institute from Kazakhstan. Armenian Women for Health and Healthy Environment (AWHHE) NGO represented Armenia.

The toys were selected by a vote of more than 3,000 parents. Half of the toys contained dibutyl phthalate, banned in the Customs Union as well. In the set of toys cars from Armenia (produced in China), the European safety standard for diisobutyl phthalate was exceeded by 190 fold. Greenpeace and the participating NGOs including AWHHE launched Fair Toys campaign. On the International Day of Child Protection, the environmentalists sent a letter to the head of the Eurasian Economic Commission appealing to ban phthalates in toys (<http://awhhe.am/%D1%81%D0%BE%D0%B2%D0%BC%D0%B5%D1%81%D1%82%D0%BD%D0%B0%D1%8F-%D0%BF%D0%BE%D0%B7%D0%B8%D1%86%D0%B8%D0%B8-%D0%BE%D0%B1%D1%89%D0%B5%D1%81%D1%82%D0%B2%D0%B5%D0%BD%D0%BD%D1%8B%D1%85-%D0%BE%D1%80%D0%B3/>; http://www.greenpeace.org/russia/Global/russia/report/toxics/phtalates_position_end.pdf). In

Armenia, the appeal was also submitted to the Ministry of Economic Development.

In this appeal, NGOs requested the Commission to strengthen the requirements of the Technical Regulations TC 008/2011 "On the safety of toys", in particular:

- the introduction of a complete ban on the use of the following phthalates in children's toys: diethylhexyl phthalate, benzylbutyl phthalate, diisononyl phthalate, diisodecyl phthalate, dioctyl phthalate, dimethyl phthalate, diethyl phthalate, dioctyl phthalate, diisobutyl phthalate;
- introducing a mandatory labeling requirement for toys to provide complete information on chemicals in a toy, including those used as impurities;
- the introduction of mandatory labeling requirements for toys to provide information on substances that are part of toys and potentially dangerous for child health and environmental well-being;
- the introduction of mandatory labeling requirements for toys to provide precautionary information about protective measures against hazardous substances, contained in a toy;
- the introduction of mandatory labeling requirements for toys to provide information about the rules for handling a toy when it becomes a waste;
- a ban on the production of children's toys from polyvinyl chloride (PVC).

In addition, NGOs noted as necessary to:

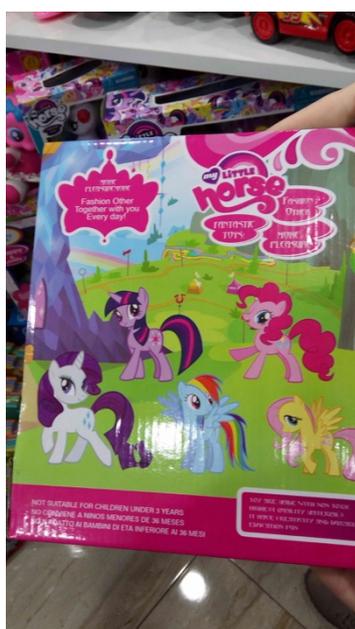
- ensure control over compliance with the requirements of this technical regulation, including preventing counterfeit products in the EAEU market;
- develop a programme to inform consumers in the countries of the Eurasian Economic Union on the use of hazardous chemicals in consumer products and their effects on human health, including by creating an information resource on the Internet;

- move towards limiting the use of hazardous substances in consumer goods based on the mass fraction of the substance in the product, and not on the migration level, which will reduce the impact of products on human health and the environment at the stages of production, use and recycling.

An important result of this initiative was the approval by the Commission (<https://acgi.ru/news/industry/eek-sozdaet-sistemu-informirovaniya-ob-opasnykh-detskikh-tovarakh/>) of Decision No. 74 dated 10 May 2018 “On the implementation of a pilot project to establish a system for informing about products that do not meet the requirements of the technical regulations of the Eurasian Economic Union”. The implementation of the pilot project will be carried out based on the above-mentioned technical regulations of the Union (“On safety of products intended for children and adolescents /TR CU 007/2011 and (“On the safety of toys” /TR CU 008/2011).

2. A brief analysis of the national voluntary or legally binding system of product labeling is included in the present report (section on legislation above).

Labels of 56 toys were examined (the types of toys purchased in Armenia for Greenpeace lab analysis) including manufacturing details and chemicals content; information on hazardous chemicals. Analysis was conducted in stores, photos of analyzed labels were taken. The results are presented in Annex A to the present report. The list of studied labels is presented in Annex B to the present report (excel file). Below are samples of analyzed labels for illustration:



3. The Guidance on evaluation of the implementation of SAICM recommendations on information on toxic chemicals in products within SAICM CiP Programme was translated into Armenian language and used as background material for the round table discussion.

4. Two face-to-face meetings with national agencies were organized: in the Ministry of Economic Development and Investments and Ministry of Health.

5. Two appeals were prepared and sent, official replies were received.

a) Appeal to the Ministry of Economic Development and Investments of the Republic of Armenia

b) AWHHE was among organizations that signed the Appeal to the Eurasia Union Economic Commission in frame of Greenpeace Russia's Fair Toys project. Official reply was received on 12.09.2018 (in Russian language)

6. National round table on Disclosure of Chemicals in Children's Toy was organized on 22 February 2018 in the premises of the Ecolur Information NGO. The event brought relevant stakeholders together to discuss the current situation with disclosure and recommend action on how to ensure better access to information on chemicals in products and the need to strengthen the existing regulations. Experiences (from the EECCA region and globally) of similar initiatives were shared. The representatives of mass media had an opportunity to take interviews that of AWHHE experts followed the presentation of project results. Among participants there were representatives of the Ministries of Nature Protection and Economic Development and Investments. Unfortunately, representatives of the Ministry of Health were not present. Other participants included representatives of NGOs, and media.



The participants to the round table discussion came up with the following recommendations:

- Introduce changes in "Toy Safety" in the Customs Union Technical Regulation, by, inter alia, setting up a working group to suggest a list of toxic chemicals to be regulated in toys
- Tighten the inspection control of national toy manufacturing companies and imported products
- Mandatory label the chemical composition of the products for children
- Periodically carry out monitoring control (including lab analysis) of locally manufactured and imported products
- Inform the consumers about hazardous chemicals in products based on the monitoring results

7. The collected information was shared through IPEN and national NGO networks (details in the deliverables section of the present report). AWHHE created a webpage on its website: <http://awhhe.am/2018-19-raising-awareness-on-health-hazards-of-phthalates-in-toys/> .

Impact on target policies:

Below is unofficial translation of the official reply letter (scan of original letter in Armenian is attached to this report) from the Ministry of Economic Development and Investments of the Republic of Armenia (dated 20.02.2019):

The Ministry of Economic Development and Investments of the Republic of Armenia, having studied the issues raised in your letter, informs that the issue of presence of phthalates in toys has also been raised by the Greenpeace International Organization and it has been repeatedly discussed in the Department for Sanitary, Phytosanitary and Veterinary Measures of the Eurasian Economic Commission.

As a result of the Conference of October 24, 2017, held in the framework of the Eurasian Economic Union, the adoption of proposals of the Greenpeace International Organization and other NGOs on

banning the presence of phthalates in toys was found inexpedient by the experts of the EAEC Working Group on sanitary, phytosanitary and veterinary measures, as the limits of phthalates set by the EAEU Technical regulations on the Safety of Toys (CU TR 008/2011) are scientifically justified.

In this context, EAEC has subsequently submitted a letter to the Republic of Armenia requesting inclusion of some types of phthalates regulated by the EU 2005/84 EC in the list of phthalates of EAEC Technical Regulations on the Safety of Toys.

Please note that following discussions held at the Subcommittee on Sanitary Measures held on September 12, 2018 within the framework of EAEU, a decision was made to amend the EAEU Technical Regulations on the Safety of Toys in the case of scientific justification of the relevant proposals.

Outreach to Stakeholders and Outcomes:

Different groups of stakeholders were engaged at different stages of project implementation. We conducted a desk analysis to clarify the level of stakeholder awareness on chemicals in products with the focus on national agencies, including the Ministries of Nature Protection and Health; we studied the reports published by environmental media (the materials by Ecolur Information NGO and Hetq investigative journalists). Before conducting product label analysis, we spoke with mothers and care-givers (through our active mothers' groups in a number of Yerevan kindergartens) who purchase toys for children to understand which toys are the most popular; we also consulted colleagues in the Greenpeace-Russia project to make sure that similar toys were studied. We held face-to-face meetings with national agencies in the Ministries of Economic Development and Investments and Health, which helped prepare letters of appeal to the national and the Eurasian Commission authorities. We invited representatives of decision-making bodies to the national round table discussion to present the project results and agree on follow-up action. We shared project results through the local media and Internet resources, various Facebook groups and Eco-Accord (IPEN Hub for the EECCA region) listserv.

Deliverables, outputs and/or products:

- A. A brief analysis of the labeling of toys in stores in Armenia (attached as Annex A)
- B. List of labels studied (attached as Annex B)
- C. The Guidance on evaluation of the implementation of SAICM recommendations on information on toxic chemicals in products within SAICM CiP Programme, translated into Armenian language
- D. AWHHE letter was sent to the Ministry of Economic Development and official reply received (scanned copy of original reply in Armenian language is attached).
- E. AWHHE press release in Armenian language.
- F. AWHHE presentation of project results (PPP, in Armenian language)

Communication Efforts:

The round table discussion was held on 22 February followed by interviews with AWHHE expert. The following coverage was received:

- Television companies
AR TV (national coverage), in Armenian
https://www.youtube.com/results?search_query=%D4%BD%D5%A1%D5%B2+%D5%B4%D5%AB+%D5%A1%D6%80%D5%A1+22.02.2019

- Internet media resources:

Ecolur Information NGO, in English, Russian and Armenian

Toys with Unknown Composition Sold in Armenian Market

<https://www.ecolur.org/en/news/quotecolurquot-press-club/-/10886/>

<https://www.ecolur.org/hy/news/quotecolurquot-press-club/-/10886/>

<https://www.ecolur.org/ru/news/quotecolurquot-press-club/-/10886/>

Hetq Investigative Journalists (in Armenian and Russian), Toy market in Armenia is poorly controlled

https://hetq.am/hy/article/101145?utm_medium=social&utm_source=facebook.page&utm_campaign=postfity&utm_content=postfityb5c3c

https://hetq.am/ru/article/101145?utm_medium=social&utm_source=facebook.page&utm_campaign=postfity&utm_content=postfity0b411

Banks Business News (in Armenian)

<https://banks.am/am/news/interviews/10344>

- Feedback by popular bloggers

Fenya Arsenyan's Blog (in Armenian)

Mkhitar Sebastatsi Educational Complex, Yerevan

<https://fenyaarsenyانبlog418601046.wordpress.com/2018/12/11/%D5%A1%D5%B4%D5%A1%D5%B6%D5%B8%D6%80%D5%B5%D5%A1-%D5%A7%D5%AF%D5%B8-%D5%AD%D5%A1%D5%B2%D5%A1%D5%AC%D5%AB%D6%84%D5%B6%D5%A5%D6%80/>

- Feedback on Facebook by local producers

NURI KIDS Eco Toys (in Armenian)

https://www.facebook.com/pg/Designnuri/photos/?tab=album&album_id=754216364701271

- Civil Responsibility and Environmental Safety Facebook Group

<https://www.facebook.com/groups/153701848550047/>

- Via IPEN EECCA Listserve (moderated by Eco-Accord Russia):

Eco-Accord News on Chemical Safety

“Consumers Denied Rights to Information Relating to Children’s Health” article

Publications shared via facebook page set up by vEco-Accord and entitled: Civil Responsibility and Environmental safety

<https://www.facebook.com/groups/153701848550047/?ref=bookmarks>

- AWHHE- shared video of coverage by AR TV to the local farmers in Armenian language; as a result- over 100 views.

Communication with National or Local Authorities

We consulted the local authorities (by phone and face-to-face meetings), and we wrote appeals. Among our counterparts were the representative of the Ministry of Nature Protection (National SAICM Focal Point). In the civil society sector, our organization, AWHHE, is the national NGO SAICM Focal Point, we also worked closely with another NGO SAICM Focal Point, NGO For Human Sustainable Development Association. All these key partners participated in the national round table discussion on the project results.

The link between the project and the implementation of particular SDGs

The table below briefly describes the link between the present CiP project and the implementation of particular Sustainable Development Goals (SDGs):

SDG	The project link
<p>3: Ensure healthy lives and promote well-being for all at all ages (in particular 3.4 about prevention of mortality from non-communicable diseases and 3.9 about reducing the number of deaths and illnesses from hazardous chemicals)</p>	<p>Label analysis was conducted to understand the availability of information on hazardous chemicals in children’s products (in particular, phthalates) in Armenia. Recommendations developed by project national team highlight the importance of disclosing information on hazardous chemicals in children’s products to protect children’s health, reduce exposure and avoid illnesses associated with phthalates and other toxic chemicals present in consumer products. .</p>
<p>16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels (in particular 16.7 about participatory decision-making and 16.10 about public access to information)</p>	<p>The project collected information about level of accessibility and transparency of information on the chemicals that are hazardous for children’s health by studying labels; and promoted policy discussions on the issue (both at national level and the level of the Eurasian Economic Commission) at the national round table and by appeals.</p>

NGO Recommendations for next steps:

The project helped raise the issue of phthalates for the first time at national level. Important discussions took place. However, a lot needs to be done to implement the SAICM objectives in this area. Our recommendations for next steps include:

- A national awareness-raising campaign about phthalates and alternatives, including among the importers of toys
- Continuation of efforts to ban the hazardous phthalates (to add to the existing list), certification procedures have to be strictly followed so that the banned/ restricted phthalates, which are not banned/restricted in the country of origin do not enter the national market.
- Strengthening capacities of the civil society representatives (active citizen groups, NGOs, Internet communities, mass media) to protect the right of consumers to information and to demand disclosure of information on hazardous chemicals by producers (special attention to be paid to the need to have information in national language).
- Continued experience sharing of the lessons learned by NGOs engaged in similar efforts at the EECCA level.

Acknowledgements

AWHHE would like to acknowledge the financial support provided by IPEN and the government of Sweden and to appreciate the technical support of IPEN and its CiP Coordinator, Dr. Olga Speranskaya, IPEN CiP project manager and head of IPEN EECCA Hub, as well as project partners of IPEN's Chemicals in Products Initiative in Nepal, the Philippines and Serbia.

AWHHE would like to acknowledge the advice and guidance from Ms. Nina Lesikhina of Greenpeace-Russia who coordinated the Fair Toys project on phthalates in toys.

We highly acknowledge Ms. Knarik Grigoryan, who visited the stores, took photos of labels and prepared label analysis.

Finally, AWHHE would like to thank all government officials who joined the discussion on hazardous chemicals in toys, and environmental journalists who expressed interest in the issue, helped us disseminate project results, and highlighted the importance of disclosing information on hazardous chemicals in consumer products with a particular focus on toys and other products for children.