

**Protecting Consumers and the Environment:  
A Comparison of Approaches to Developing Restricted  
Substance Lists by Makers of “Stuff We All Use”**

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## Study Objectives

The purpose of this study is to analyze and better understand the processes by which restricted substance lists are developed within progressive companies in different business sectors, and to learn how an externally created list such as the SIN List can aid downstream users in restricting hazardous chemicals in their products and supply chains. More specifically, the objectives of this study are to:

1. Highlight a few examples of what companies are doing to restrict use of questionably hazardous chemicals in their products, as well as describe hindrances of information flow along supply chains;
2. Understand the criteria and reasoning for substance inclusion in three progressive companies' restricted substance lists, and how these criteria compare with those used to create the SIN List;
3. Learn about the sources of information behind these criteria and other decisions that are made to restrict use of questionably hazardous chemicals in products.

## Brief Summary of the Issues

Chemical<sup>1</sup> manufacturers are at the farthest upstream end of supply chains. Manufacturers either produce chemicals or chemical compounds or extract them in their natural state. Downstream users of these substances are businesses located downstream of the chemical manufacturers in the supply chain (excluding distributors and retailers) that use substances in the products or services they provide. It can be challenging for downstream users to obtain the information they need about the substances they use in their products; the desired information usually includes basic substance identity and/or the hazard or risk properties of a substance.

Several possible reasons for this challenge in obtaining desired information were identified during a series of in-depth interviews with senior management from three downstream user companies. Some of these reasons include:

- A chemical manufacturer may simply not have risk or hazard data on the substances it sells,
- A chemical manufacturer or supplier may not understand what kind of information a downstream user is asking for,
- Providing risk or hazard information about the chemicals it sells may not be consistent with a chemical manufacturer's level of transparency,
- Certain substances may be considered trade secrets, and the manufacturer may have intellectual property rights protecting the information it has about its substances,
- The chemical manufacturer may think that the hazard information it has on a chemical is either incomplete or irrelevant to the downstream user's application of the chemical.

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<sup>1</sup> The words "chemical" and "substance" will be used interchangeably throughout this report to mean the same thing.

In such an environment, it can be very difficult for downstream users of chemicals to get the information they feel they need about the chemicals they use, and in the form that they want it. Thus, it is often up to the downstream user to evaluate: (1) the potential hazards associated with a given chemical, and (2) whether or not better alternatives exist. These tasks will be even more challenging for smaller companies with more limited resources.

## **The SIN List 1.0**

As new information continues to emerge on the potential dangers of chemicals, and as consumer awareness of chemical hazards grows, businesses are beginning to realize the implications for their brand image and overall competitiveness. This is causing an increasing number of businesses to take a closer look at the chemical status of their products and production processes.

At the same time, the European Chemicals Agency (ECHA)<sup>2</sup> has released its first candidate list of chemicals for authorization under the new Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) legislation<sup>3</sup>. Many expected this list to be quite long, but instead it contained only a handful of chemicals. ECHA's Candidate List is expected to grow over time, but constant changes in substance restriction lists can be expensive and time-consuming for businesses, as they adapt their products and processes to reflect the changes.

In reaction to ECHA's short Candidate List and to help downstream users of chemicals better understand the hazard properties of some of the chemicals they use, ChemSec created the Substitute It Now (SIN) List 1.0. Using the REACH criteria for establishing Substances of Very High Concern (SVHCs), and based on the best available scientific information, ChemSec worked with numerous scientists and NGO colleagues from around the world in selecting the 267 substances that comprise the SIN List 1.0<sup>4</sup>.

The SIN List provides a powerful resource to help companies take control of the substances that enter their products and processes. Several progressive companies are looking to the SIN List for guidance or inspiration in making long-term decisions about which chemicals to include in their restricted substance lists. The study below describes in more detail the chemicals management strategies developed by three progressive companies, the challenges they have faced in getting information about the substances they use, and how these companies are using the SIN List (or being inspired by it) in an effort to keep hazardous substances out of their products and processes.

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<sup>2</sup> See [http://echa.europa.eu/home\\_en.asp](http://echa.europa.eu/home_en.asp)

<sup>3</sup> See [http://echa.europa.eu/chem\\_data/candidate\\_list\\_en.asp](http://echa.europa.eu/chem_data/candidate_list_en.asp)

<sup>4</sup> A thorough report on the background of the SIN List 1.0, as well as the list itself, can be found on ChemSec's website: <http://www.chemsec.org/list/>

## **Study Design**

This study focuses on downstream users that provide products with which consumers interact directly. The data collected for this study consist of: (1) interview responses of senior sustainability management representatives from three international or multinational companies, and (2) any documentation on their restricted substance lists that these representatives chose to share. Each representative participated in an in-depth, semi-structured interview.

## **Study Results: A Look at Three Proactive Approaches to Restricting Hazardous Chemicals in Products**

### ***Case 1: Sony Ericsson***

#### **Description of restricted substances list**

Sony Ericsson has a banned substance list and a restricted substance list, both of which are posted on its website for interested customers, suppliers, competitors, and anyone else to view. Sony Ericsson's intent with its lists is to prevent certain hazardous substances from entering its production system and products, as well as to phase out or restrict use of other substances that are already in the system or in existing products. The original decision to create the lists was made years ago by Ericsson, the mother company, resulting from discussions between the environmental and research and development departments. Today, the five members of Sony Ericsson's sustainability team are responsible for continual development of the lists.

Sony Ericsson's first criteria for determining substance inclusion on its banned substance list are global legislations. Since the company sells the same products in all of its markets, it uses the most restrictive global requirements in the design of all its products. Thus, a substance that is banned in any country where Sony Ericsson sells its phones will not be allowed in any Sony Ericsson product.

Sony Ericsson does not perform scientific studies itself on the human and environmental health effects of the chemicals it uses in order to consider them for its banned or restricted substances lists. Instead, it gathers information from a variety of sources, as described in the following section. For substances considered for inclusion in the lists, Sony Ericsson must first determine whether substitution with less hazardous alternatives is even feasible, either in the short or long term. For example, if Sony Ericsson finds out that it is using a possibly carcinogenic substance and the substance can be readily substituted or phased out, then Sony Ericsson will put the substance on one of its lists. The restricted substance list can be useful as a holding spot for some substances of concern, as it allows Sony Ericsson to identify any substances it wants to eventually place on its banned list, while giving it time to work with suppliers and its research and development team to find less hazardous alternatives. However, there are a few chemicals used in the electronics industry for which there are no known less

hazardous alternatives. For instance, arsenic is used in very small amounts in all amplification devices, from those found in televisions and stereos, to those included in laptops and mobile phones. In such cases, where an undesirable chemical is required to bring an important function to society, the idea is to use the minimum amount possible in a controlled way.

### **Gathering input from many sources**

Aside from legislative bans, Sony Ericsson also acts on information and concerns it receives from customers (i.e., operators like AT&T, Vodaphone, etc.) and end users. Sony Ericsson maintains excellent contact with its operators and receives many questions and requirements from them. The operators' questions and requirements come from a wide variety of sources, such as NGOs, scientific studies, public concerns, recommendation lists for procurement, as well as legislation. Sony Ericsson also listens directly to the concerns of end users (i.e., consumers). As one example, Sony Ericsson banned nickel from its products after some customers complained of allergic reactions to it; such allergic reactions were also documented in academic studies.

### **What information is missing?**

While Material Safety Data Sheets (MSDSs) can provide some useful information, especially on "work environment" issues, Sony Ericsson has found that more information on material content is often needed; for instance, an MSDS may not indicate whether plastic parts are halogen free or not. As is the case for many downstream users, it can sometimes be difficult for Sony Ericsson to get basic information about material contents, often simply because the supplier does not understand what the company is asking for. To be sure that there are no misunderstandings about product contents, Sony Ericsson sends its mobile phones out for external analysis of chemical content to verify supplier information.

Sony Ericsson explained that there are two possible methods it could use to try to ensure that the items produced by its suppliers do not contain hazardous substances. First, a system such as the one that is currently in place could be used, where suppliers verify that their products do not contain the substances included on Sony Ericsson's banned or restricted substances lists. The second route would be through use of a materials declaration system. Sony Ericsson prefers the latter strategy because it allows for a proactive strategy as new hazards become known, while also monitoring for known hazards.

Because Sony Ericsson wants to know exactly what is in its products and in the past did not feel it was getting sufficient information from all suppliers, it began implementing a materials declaration system in May 2008. The system has been in development over the past few years, and uses a standard industry format (IPC-1752) to collect information from suppliers. This means that Sony Ericsson wants full disclosure concerning all substances in all components of all Sony Ericsson products from all suppliers. Sony Ericsson estimates that it should have full disclosure on all components in their products by the end of 2009.

## **Challenges of being a forerunner in an industry**

Sony Ericsson occasionally puts substances on its restricted substances list, even when there is no clear indication that substitution with a less hazardous alternative is feasible. For instance, this was the case with antimony; the substance was included on the restricted substances list without a clear indication of whether or not a better substitute was available, but Sony Ericsson worked with its suppliers and in-house research and development and materials experts to find one.

Having a restricted substance list as well as a banned substance list is important, because this allows the company to work on phasing out particular chemicals over a longer timeframe. As a forerunner in the industry, it may take years for Sony Ericsson to find new technologies and to overcome resistance to change among suppliers.

Educating suppliers in providing full disclosure also takes time. This education may actually be beneficial for both the suppliers and the industry, however, since Sony Ericsson predicts that the requirement for full disclosure will become more standard in the industry. A few other mobile phone companies are already starting to follow suit.

## **Reactions to and use of SIN List 1.0**

The SIN List is quite new, so it has not changed the way Sony Ericsson thinks about any of the chemicals it is currently using. Several SIN List chemicals are already on Sony Ericsson's banned or restricted substance lists; a few others, such as arsenic, have no substitutes so cannot be included in Sony Ericsson's lists. In the future, the SIN List will be a good complement to Sony Ericsson's materials declaration system, providing a way for the company to quickly scan chemicals included on suppliers' declarations lists for potential hazards.

## **Suggested improvements to SIN List 1.0?**

Sony Ericsson had a recommendation rather than a suggested improvement to the SIN List 1.0. The company believes that the List is quite good, and in the short term it suggests that ChemSec concentrate on publicizing the List and getting companies to use it rather than expanding it with additional chemicals.

## ***Case 2: Sara Lee***

### **Description of banned and restricted substances lists and strategy for substance inclusion**

Sara Lee's "lists" are better described as a targeted iterative evaluation "system," comprising thousands of chemicals contained in thousands different raw materials the company uses. A single list would not serve Sara Lee's needs, ranging from baby care products to high performance insecticides; instead, a system with different category options is needed, known in the company as the "Critical Ingredient Program".

The aim of Sara Lee's system is to accomplish both avoidance of substances entering its production system and/or products and to phase out or control substances that are

currently in use. As further explained below, its Category D is used to keep certain chemicals from entering products or processes, and the other three categories are used to phase out or manage all the chemicals that the company currently uses.

Both management and specialists at Sara Lee are involved in developing and enforcing the program for banned and restricted substances. This team includes management representatives, general managers, consumer managers, legal specialists, and representatives from research and development, safety, environmental, and regulatory affairs, so the decision-making team combines a wide range of expertise.

Sara Lee's system includes all of the chemicals it uses, and is comprised of categories A, B, C, and D. Chemicals are assigned to the different categories based on their properties, as follows:

- Category D includes chemicals that Sara Lee has banned from use in any of its products. Even trace levels of contamination are strictly forbidden. For example, these are chemicals which are known to be CMRs (carcinogenic, mutagenic, or reprotoxic), based on California's Proposition 65 and other such reputable lists or regulations from around the world.
- Category C contains chemicals that are to be phased out of Sara Lee products, though there are neither immediate bans within Sara Lee or legislative bans within countries where Sara Lee sells its products. These are chemicals for which there are no alternatives, but are currently used in small and controlled amounts.
- Category B comprises chemicals that have certain restrictions on their use in certain product categories, but are not usually a danger for the consumer. Basically, the quantities of these chemicals just need to be limited in certain sensitive-application products, such as cosmetics and baby care. This category also includes chemicals for which there may be better alternatives, those that are difficult to formulate, and those that have compatibility issues with other chemicals.
- Category A chemicals can be used in any Sara Lee products without limitations.

The moment that there is scientific evidence demonstrating that a chemical is carcinogenic, mutagenic, toxic/reprotoxic, very poorly degradable, very bad for the environment, or very hormone disturbing, Sara Lee classifies the chemical as Category D. In cases where it is less obvious that a chemical is hazardous, but where there are certain indications that the chemical could be carcinogenic or reprotoxic, Sara Lee takes precautionary measures and classifies it as Category C to be phased out, unless there is sufficient evidence that there is nothing wrong with the chemical. Chemicals can move between categories as new information becomes available, e.g., a new paper is published in peer reviewed literature or the labeling/status of a chemical changes, requiring Sara Lee to reconsider the classification.

### **Constant chemicals vigilance**

Sara Lee does not test the substances in its products for hazard traits. Instead, the company is dependent on the following sources of information on chemicals:

- Scientific data available in the literature,

- Scientific data that it receives from different commissions that are allowed to test its product ingredients,
- Information it receives from its suppliers,
- Other scientific sources, such as the different lists used in other countries (e.g., Proposition 65 in California), and recommendations by various European scientific committees which evaluate chemicals for different categories of use.

There is a huge amount of information of varying quality about chemicals that is available through the sources above. Sara Lee's Safety, Environmental, and Regulatory affairs department filters through this information, decides on which claims may be valid, and gives its opinion on whether or not a given chemical is safe. There is currently a small group within this department that is dedicated to chemicals management. The toxicologists in this group monitor all of the different lists and developments in industry, the literature, the monographs, and the trials that are being published in the technical literature, as well as international regulatory, NGO, and scientific developments. When Sara Lee hears about a possible problem, it tries to find the source, examines the data, and engages its in-house experts to determine if there is a real problem.

### **Reactions to and use of SIN List 1.0**

The SIN List is very much in line with Sara Lee's Critical Ingredient Program and its Category D classification for chemicals. In fact, the SIN List uses the same criteria for chemical inclusion as Sara Lee uses for Category D chemicals, so Sara Lee basically sees the SIN List as an extension of its own system. The only difference that Sara Lee perceives between its system and the SIN List is that the SIN list tends to be more precautionary by including chemicals that Sara Lee feels have too little evidence, in the form of scientific publications or data, to indicate that they should be substituted or banned.

The SIN List affected Sara Lee's business by putting "a bit more accent" on certain chemicals to further investigate their hazard traits or their existence within Sara Lee's supply chain. Also, Sara Lee reclassified as Category D any chemicals it was using that were included in the SIN list but not in its Category D.

### **Suggested improvements to SIN List 1.0?**

Sara Lee's suggested improvements focused on ways to make the SIN List more user-friendly and useful to businesses, both small and large. The first suggestion for improvement dealt with the organization of the List. Since the current list of SIN chemicals are not organized by sector or application, Sara Lee felt that the List would be easier for companies to understand and use if it included some description of the types of sectors and processes in which a certain chemical is typically used. Such a refined organization would allow companies to quickly understand a chemical's relevance to their sector and supply chain, or at least allow them to be able to filter through the information more easily. This information could make the system more manageable for a company by helping it understand where to focus its efforts and what the implications are for the company, its raw materials, its systems, and its processes. The suggested refinement will be highly beneficial to smaller companies that want to

use the SIN List, but do not have specialists who can systematically go through all the SIN List chemicals and their company's whole system to determine which chemicals are relevant to them.

The second suggested improvement is to include information on alternatives, and whether a chemical is substitutable at all in certain applications. Making these two improvements to the SIN List could make it easier for industry to practically work on substituting with less hazardous chemicals.

### **Case 3: Skanska**

#### **Description of strategy for restricting hazardous substances**

The decision to have a restricted substance list at Skanska was made by management. Acrylamide contamination occurring on Skanska's 1997 Hallands Tunnel Project harmed exposed animals and the environment, and served as "a wake-up call" to the Swedish construction industry. Following this event, Skanska resolved that the entire corporation, including all business units, must be ISO 14001 certified by the year 2000. The existing business units met this goal, and any newly acquired businesses have two years from the date of acquisition to get certified.

Several Skanska business units have developed their own chemicals management systems or restricted substance lists, which they use within their individual territories. For instance, Skanska Sweden was involved in the creation of the Swedish construction industry's BASTA<sup>5</sup> system, and later created its own restricted substances system that is very similar to BASTA and the national Swedish legislation. Skanska Sweden's system includes a list of restricted substances as well as priorities for restriction, e.g., if a substance is a CMR. The Skanska business units in Norway, Finland, Poland, and the UK also have their own systems, involving different combinations of collecting MSDSs, developing databases, borrowing information from each other, and so forth. Each business unit operates somewhat differently depending on the local business environment. The Skanska Sweden chemicals management system is the most comprehensive of the business units' systems, which cannot be used world wide as chemicals restrictions that apply in Sweden, are perfectly legal in other business units' territories.

Even though many of the business units have their own approaches to chemicals management, the company also wanted to develop a simple, common system that would apply to all Skanska projects worldwide. So corporate sustainability managers examined the different business units' lists, upcoming chemicals legislation, the impacts of REACH, and other factors, in an attempt to increase the currently available global list of restricted substances, which will continue to grow longer over time. Skanska's global restricted substance list basically represents the overlap in all the Skanska business units' lists, including chemicals that are either already covered by existing legislation or

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<sup>5</sup> <http://www.bastaonline.se/english/bastaonline.4.3d9ff17111f6fef70e9800039672.html>

ones that will likely be regulated soon, and should therefore be restricted on all Skanska projects.

Currently, and since 2000, Skanska has five substances that are globally restricted on all projects. Though the decision is still being finalized, Skanska hopes to expand this global list to include six additional substances. The focus is on certain heavy metals and man-made chemicals of concern. Skanska believes that having a simple though short list of globally restricted chemicals will get employees and sub contractors within Skanska working actively with chemicals issues and where chemicals management improvements can sensibly be made. The company is currently trying to determine how much chemicals management can realistically be achieved at the corporate level, what level of management needs to occur at the business unit level, and what information is transferrable between the two systems.

The basic structure of Skanska's global restrictions list is simple: for each of the substances included in the list, details on "Examples of usage", "Concentration limits in weight percentage", "What harm is it known to cause", and "Dangers to human health or environment" are all spelled out for clear communication. With this format, Skanska has tried to translate the various substances into the relevance for the construction industry, presented in a clear form that anyone can understand.

### **The reality of the construction industry**

Skanska is almost always a downstream user of chemicals - rarely does the company make preparations, with the exceptions of concrete and asphalt. Basically, Skanska does not deal with chemicals, but with materials, which are quite often branded products. And what makes things even more complicated is that a branded product in one country may be branded as something else in another.

Creation of a restricted substance list in the construction industry is a very difficult task, since there is no source or database for building materials where one can actually see what substances comprise a particular building material. Without knowing what substances are in a material, it is difficult to know what to look for. Skanska finds it especially important to know what is in the materials it uses on its construction projects since the structures are built to be around for a long time.

Skanska is continually trying to improve its control over what substances are used on its projects, but admits that it is incredibly difficult to control every substance that comes onto a job site. With about 96,000 suppliers and 250,000 subcontractors working on Skanska projects at any one time, and with a workforce that can change at project level by up to 40% in any given month, Skanska generally feels that it has little control over the materials and substances used on some projects. It is also easy for materials to be brought in from local shops or from other countries as needed, as many Skanska sub-contractors come from outside the country in which they are working. For instance, when a worker realizes that he or she needs a tube of something to use on a project, the worker will not likely go through Skanska's system to look for what is allowed. Instead, the worker will simply use whatever product he or she is used to using.

Skanska representatives emphasized that it can be really difficult to get full disclosure on material contents in the construction industry. Sometimes manufacturers will not disclose information because it is “not their level of transparency”, other times it is an issue of intellectual property. Skanska works actively with its suppliers to get as much information as possible on material contents, anticipate whether any sustainability issues are likely to occur, and educate the suppliers on its restricted substance lists.

### **Challenges of being a forerunner in an industry**

The concept of the SIN list – that of substitution – is one that is starting to develop in Skanska. As mentioned above, a few business units within Skanska are starting to design their own SIN-like lists of chemicals for substitution, but this process must be done market-by-market since the products used in different construction markets are different, as may be the substitutes. In other words, two brands of a product used to accomplish the same outcome may chemically be very different.

As one example, Skanska’s UK business unit has been working for over two years on a project to determine which alternatives are the most ecologically friendly in their market, and the project is still ongoing. Skanska UK is going company-by-company, looking at all of the substances in all of the products in their market, as well as at product life cycles, to find the best alternatives available for use on UK projects. Unfortunately, it is impossible for Skanska to simply apply the results of this effort in all of its business units, because the products being assessed are specific to the UK market.

According to Noel Morrin, SVP Sustainability & Green Construction, such efforts are “the start of the move long term towards some sort of global consensus that is relevant to the construction industry. At the moment, the SIN list is a global consensus of NGOs about what’s really nasty that’s out there. What we need to do is find a way to translate that into what’s really nasty out there that’s relevant to us. And then we have to deal with the real life issue that...in every market, the stuff we use is called something different.”

### **Reactions to and use of SIN List 1.0**

As a downstream user itself, Skanska emphasized that it appreciates the importance of the SIN List. While Skanska learned a lot from the List and thinks it contains valuable information, the company cannot easily make use of the List in the construction industry. Skanska is located at the far downstream end of the supply chain and cannot control the chemicals that are in all of the materials used on its projects. Instead Skanska will use the List as inspiration for construction industry relevant restrictions lists, both at the business unit level and company-wide.

### **Suggested improvements to SIN List 1.0?**

Skanska’s main comment about improving the SIN List is that it would be helpful to have it reflect a more international perspective. The current list refers mainly to REACH, and it could be beneficial to include sources, requirements, and other information relating to international regulations in addition to REACH. For example,

Skanska suggested having links to U.S. and Canadian regulations. This would help Skanska and other businesses take a more international view in developing their overall restricted substance lists. Referring only to REACH is not appropriate for all of the countries in which Skanska does business.

## **Summing Up and Looking to the Future**

Currently, it can be challenging for downstream users of chemicals to get the hazard information they need concerning the substances they use, and to determine if less hazardous alternatives exist. The companies discussed above have developed their own creative strategies for chemicals management, and work with their suppliers, in an effort to minimize hazardous substances in their products and supply chains. Also, representatives from each company see the value of the SIN List 1.0 in helping businesses anticipate the substances they should focus on phasing out of their products or processes.

While representatives from each of the companies interviewed have faced challenges in trying to manage hazards, they seem optimistic about the future. Sony Ericsson representatives predict that the requirement for full disclosure will become more standard in their industry, and note that other mobile phone companies are already starting to follow suit. As suppliers become more accustomed to full disclosure policies, supplier education requirements and resistance to change will decrease, and Sony Ericsson's job will be easier. Similarly, while Skanska representatives think that the construction industry is a long way from having complete control over the substances brought onto project sites, they sense that a long-term trend toward smart substitutions is underway. Some of the Skanska business units are leading the way in this regard.

Zoran Gavric from Sara Lee commented that he is personally and professionally very happy about REACH and the positive changes it will bring, especially for downstream users. While acknowledging that there are still some issues to be worked out, he thinks that "REACH will be a really good solution," saying that it should make life easier for downstream users, and that the information flow will be much improved. He says that businesses are already starting to carry out their required REACH work, and that we will gradually see the benefits of REACH roll out in the coming years. He thinks that the mentality within companies will also gradually change - that they will start to understand that responsibility is being transferred from authorities to industry, and they will understand their "new responsibility for chemicals safety and for the safety of consumers". He thinks this "maturation process" in industry will grow and improve with time, as companies realize what chemicals management actually is and make it part of the way they do business. He sees cooperation among manufacturers, suppliers, downstream users, consumers, consumer organizations, and NGOs as a key to success.