Dear Dr. Marcos A. Orellana,

At **Forbrugerrådet Tænk Kemi** (Danish Consumer Council THINK Chemicals), a NGO, we help consumers avoid problematic chemicals in consumer products. We test products to provide consumers with information on how to live a life without problematic chemicals.

All consumers are at risk of being exposed to problematic chemicals. We strive to reach out to all segments of society and in our tests, we examine consumer products such as headphones, carpets, detergents, toys, cosmetics, chewing gum and cleansing tissues and much more. Children and pregnant women are particularly vulnerable to problematic chemicals. Consequently, we put in an extra effort in testing consumer products aimed at these groups.

We are independent of authorities, business communities and political parties. Our funding comes from Folketinget, the Danish Parliament. Our activities are continuously coordinated with the authorities, e.g., the Danish Environmental Protection Agency – mainly to make sure our work does not overlap theirs, but instead is a supplement to their work. We focus on substances that are illegal, but also substances that are in the vacuum between scientific knowledge and regulation.

You can see more about our tests here: [Danish Consumer Council THINK Chemicals (taenk.dk)](https://taenk.dk/kemi/danish-consumer-council-think-chemicals)

We have been testing now for 9 years, continuing, and strengthening a tradition of testing by Forbrugerrådet Tænk, which has existed since 1947 - [About us | Forbrugerrådet Tænk (taenk.dk)](https://taenk.dk/about-us).

**Pollution Information Portals**

We use different portals in our work, but it is extremely difficult. Some of the portals are available as lists at the EU level and we have incorporated them in our own database here at Forbrugerrådet Tænk Kemi.

But I wanted to raise a particular issue, the SCIP Database of the EU.

We have for a long time wanted to use the SCIP database of the EU ([SCIP-Database - ECHA (europa.eu)](https://echa.europa.eu/da/scip-database)), which has an overview of all the articles that contain Substances of Very High Concern (SVHC). The database lists all the articles (more than 12 million) on the EU market in which the SVHCs are contained, but it is impossible to find out which consumer products these chemicals are in. This is of course because many of the usages are in industrial processes, and therefore not relevant in consumer goods, but SVHCs are also used in consumer goods, which many tests and investigations from us and other NGOs have shown.

Together with 20 NGO partners and authorities we have created the app Scan4Chem and the database behind it in the [AskREACH project](http://www.askreach.eu/), supported by the EU Life programme. In the project we help consumers ask companies (“the right to know” of REACH) via the Scan4Chem app whether their products contain SVHCs or not.

The app scans the barcode and sends a request to the companies behind the products. Our hope was that the companies would answer (they have 45 days to do so), and leave the answer in the database behind the app. Unfortunately, the requests are seldomly answered and rarely in the database, but instead directly to the individual consumer. [LIFE-AskREACH-letter-to-COM.pdf](https://www.askreach.eu/wp-content/uploads/2022/04/LIFE-AskREACH-letter-to-COM.pdf) Answering around the database means that an answer to one consumer cannot benefit the next consumer to scan the same product (which is the intention of the app).

During our work in developing the app and the database we have been in contact with ECHA (responsible for the SCIP database) and we have tried to get the SCIP database integrated in the Scan4Chem database. An integration would provide the answers to the consumers right away.

An integration has not been possible yet because of lack of funding in ECHA to do the task.

An integration of the SCIP database into the Scan4Chem would:

* Greatly increase the transparency of the unwanted (SVHCs) chemicals used in consumer goods.
* Create incentive for the companies to NOT use the SVHCs.
* Give a better tool for the authorities to enforce the legislation and check the companies’ compliance.
* Give NGOs a better chance of guiding consumers.
* Entail fewer unwanted chemicals in consumer products (long term).

**Forbrugerrådet Tænk Kemis database**

At Forbrugerrådet Tænk Kemi we have be collecting data on ingredients in cosmetics, personal care products and detergents the last 8 years. This is done through our app, Kemiluppen (The chemical magnifying glass).

The consumers scan the barcode, and if we have the product in our database, they receive our rating (**A** (no problematic chemicals), **B** (a few specific chemicals) or **C** (many different problematic chemicals) rating) right away. If the product is not in the database, they can send it to us via the app, taking pictures of the front and the ingredients. We then check the ingredients, and the send the result to the company behind the product before publishing the product and the rating in the app. You can see how we test here: [The Danish Consumer Council THINK Chemicals’ test methods (taenk.dk)](https://taenk.dk/kemi/english/danish-consumer-council-think-chemicals-test-methods)

It is a popular app here in Denmark: 780,000 downloads since December 2015 and almost 20 million scans. We have rated more than 34,000 products and we could evaluate even more but lack the funding for extra resources.

The database is not only being used by consumers. Scientist and authorities are also using the data contained in the app. Data has been used in 9 reports from the Danish Environmental Protection Agency and at least three times has data from Kemiluppen been used in scientific peer reviewed articles. (See attached). Hopefully the data this way leads to better regulation.

We of course as well also share all our knowledge with our European partners, the green and consumer NGOs.

**The point is that transparency about where the chemicals are being used benefits many individuals as well as organizations and authorities, in the end leading to fewer unwanted chemicals in the environment and in people.**

Our plea is that the producers of consumer products are meet with requirement of obligatory labelling of the chemical ingredients. By getting the unwanted chemicals out in the open and easily accessible, we can help consumers make informed choices at the point of sala, and in addition, authorities and scientists will get an overview of where these chemicals are used and thusly can make better regulation.

I hope you will end up recommending more openness and transparency for the databases and that you also will recommend that the data in the existing databases is made easily available for NGOs like Forbrugerrådet Tænk Kemi.

If you have any questions, please do not hesitate in getting in touch.