

AZODYES

***CONSULTATION DOCUMENT ON
THE IMPLEMENTATION OF
EUROPEAN DIRECTIVES***

**2002/61/EC (AZOCOLOURANTS)
and
2003/3/EC ('BLUE COLOURANT')**

CCP/011/03

September 2003

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1. INTRODUCTION

[This Consultation Document is issued by the *Department of Trade and Industry (DTI)* and was compiled in collaboration with the *Department for Environment Food and Rural Affairs (DEFRA)*.]

1.1 PURPOSE OF CONSULTATION

1.1.1 This document seeks your views on how the United Kingdom proposes to implement:-

- Directive 2002/61/EC which amends for the 19th time Council Directive 76/769/EEC. Member States were required to adopt and publish regulations necessary to comply with this Directive by 11 September 2003. Such regulations will apply as soon as possible after 11 September 2003.
- Directive 2003/3/EC which adapts to technical progress for the 12th time Council Directive 76/769/EEC. Member States are required to adopt and publish regulations necessary to comply with this Directive by 31 December 2003. Such regulations will apply from 30 June 2004.

1.1.2 It also seeks your views on the likely impact the proposed regulations will have on UK industry, consumers and the environment.

1.2 RESPONSES

How to respond to this consultation.

1.2.1 Responses concerning the restrictions in the proposed regulations on the use of certain azodyes in textile and leather articles which may come into direct and prolonged contact with the skin or oral cavity and on the placing on the market of these articles, should be sent to the Department of Trade and Industry.

by e-mail: david.jenkinson@dti.gsi.gov.uk

by post: David Jenkinson
Consumer and Competition Policy Directorate
Bay 432
Department of Trade and Industry
1 Victoria Street
London, SW1H 0ET

1.2.2 Responses concerning the restrictions on the use of the azodye 'blue colourant' for colouring textile and leather articles and on the placing on the market of such articles, should be sent to the Department for Environment Food and Rural Affairs (DEFRA).

by e-mail: andrew.scarsbrook@defra.gsi.gov.uk

by post: Andrew Scarsbrook
Department for Environment Food and Rural Affairs
3/E3 Ashdown House
123 Victoria Street
London, SW1E 6DE

1.3 CLOSING DATE

Responses must be received no later than 9 October 2003.

1.4 OUTCOME

We aim to publish the outcome of this consultation by 6 November 2003.

1.5. CONFIDENTIALITY

Your response to this consultation document may be made publicly available in whole or in part at the Departments' discretion. If you do not wish all or part of your response (including your identity) to be made public, you must state in the response which parts you wish us to keep confidential. Where confidentiality is not requested, responses may be made available to any enquirer, including enquirers outside the UK, or published by any means, including on the Internet.

1.6 CONSULTEES

We are sending this document to the consultees listed in Annex D. Please tell us if you know of others who would be interested in receiving this consultation document.

The document is on the Department of Trade and Industry's website

<http://dti.gov.uk/ccp/consultations.htm>

and also on the Department for Environment Food and Rural Affairs website

<http://www.defra.gov.uk/corporate/consult/>

It is also available by request from DTI, obtainable from the source listed in paragraph 1.2.1

1.7 HELP WITH QUERIES

If you would like help with queries or require further information about this consultation please contact :

David Jenkinson: 020 7215 0366

Andrew Scarsbrook: 020 7944 5265

2. SUMMARY

2.1 Directive 76/769/EEC seeks to protect human health and the environment in the Member States by restricting the use of dangerous substances and preparations listed in Annex 1 of the Directive. Member States are required to take all necessary measures to ensure that the dangerous substances and preparations listed in Annex 1 may only be used or placed on the market subject to the conditions specified therein.

2.2 Directive 2002/61/EC was adopted 19 July 2002. This Directive amended for the nineteenth time Directive 76/769/EEC by adding Point 43 to Annex 1 of the Directive. It concerns the prohibition on the marketing and use of certain azodyes used in textile and leather articles, which, under certain conditions, may breakdown to form carcinogenic aromatic amines. The marketing and use of textile and leather items coloured by these azodyes are similarly prohibited.

2.3 Directive 2003/3/EC was adopted 6 January 2003. This Directive adapted to technical progress for the twelfth time Directive 76/769/EEC by adding another substance to Point 34. It concerns 'blue colourant', a mixture of two azodyes, which gives a high aquatic toxicity, is not easily degradable and can reach the environment via waste water. Directive 2003/3/EC prohibits the marketing and use of 'blue colourant' and also prohibits the marketing and use of textile and leather items coloured by this substance.

2.4 It is proposed that *The Controls on Azodyes Regulations 2003* will implement both of these Directives. A draft of these Regulations can be found at Annex C.

3. CONSULTATION DOCUMENTS

3.1 IMPLEMENTATION OF DIRECTIVE 2002/61/EC (azocolourants)

3.1.1 Directive 76/769/EEC seeks to protect human health and the environment in the Member States by restricting the use of dangerous substances and preparations listed in Annex 1 of the Directive. Member States are required to take all necessary measures to ensure that the dangerous substances and preparations listed in Annex 1 may only be used or placed on the market subject to the conditions specified therein.

3.1.2 Azocolourants, encompass both azopigments and azodyes. Azodyes are used to colour, amongst other things, textiles and leather and in some circumstances they have the potential to breakdown into aromatic amines, some of which may pose cancer risks. Such carcinogenic amines may be released from azodyed materials when in contact with the skin due to the presence of sweat and also from ingestion due to the sucking, by children in particular, of azodyed materials used in clothes and toys etc.

3.1.3 The European Commission consulted the EU Scientific Committee on Toxicity, Ecotoxicity and the Environment (CSTEE) who confirmed that the cancer risks posed by textile and leather goods coloured by certain azodyes, did give cause for concern.

3.1.4 Some EU Member States have in place, or are in the process of developing, domestic legislation that prohibits the marketing and use of such azodyes. The European dyestuff industry has for a number of years operated a voluntary ban on the manufacture of such azodyes.

3.1.5 In the light of this, Directive 2002/61/EC was adopted on 19 July 2002 in order to harmonise the laws of the Member States and to protect human health by prohibiting the use of these azodyes and the placing on the market of articles coloured with such azodyes.

3.1.6 Directive 2002/61/EC, amending for the 19th time Directive 76/769/EC, inserted a new Point 43. The provisions of the Directive concern the prohibition on the placing on the market for consumer use of articles coloured with these azodyes and the prohibition on the use of these azodyes in the manufacture of such articles.

3.1.7 Use of certain azodyes in textile and leather articles and the marketing of such articles.

3.1.7.1 Point 43.1 prohibits the use in textile and leather articles, which may come into direct and prolonged contact with the skin or oral cavity, certain azodyes which, by reductive cleavage of one or more azo groups, may release one or more carcinogenic aromatic amines in detectable concentrations. Furthermore, it prohibits such textile and leather articles being placed on the market

“Detectable concentrations” is defined in Point 43.1 as being above 30 ppm in the finished article or in the dyed parts of such articles.

A list of the twenty-two such aromatic amines is given in the Appendix to Point 43.

Examples of textile and leather articles, which “may come into direct and prolonged contact with the skin”, are listed in Point 43.1 and include: -

- clothing, bedding, towels, hairpieces, wigs, hats, nappies and other sanitary items, sleeping bags,
- footwear, gloves, wristwatch straps, handbags, purses/wallets, briefcases, chair covers, purses worn round the neck,
- yarn and fabrics intended for use by the final consumer.

3.1.7.2 In order to allow for the recycling of textiles, which has overall benefits for the environment, these provisions do not apply to textile articles made of recycled fibres. This provision applies only if the listed amines are released by residues from previous dyeing of the same fibres, and if the listed amines are released in concentrations below 70 ppm. This exception applies until 1 January 2005.

3.2 IMPLEMENTATION OF DIRECTIVE 2003/3/EC (blue colourant)

3.2.1 Directive 76/769/EEC seeks to protect human health and the environment in the Member States by restricting the use of dangerous substances and preparations listed in Annex 1 of the Directive. Member States are required to take all necessary measures to ensure that the dangerous substances and preparations listed in Annex 1 may only be used or placed on the market subject to the conditions specified therein.

3.2.2 Azocolourants, encompass both azopigments and azodyes. Azodyes are used to colour, amongst other things, textiles and leather and in some circumstances they have the potential to breakdown into aromatic amines, some of which may pose a risk to the environment.

3.2.3 The risks to the environment were assessed under Commission Directive 93/67/EC of 20 July 1993 and identified a need for reducing the risks of blue colourant to the environment as this blue colourant has a high aquatic toxicity, is not easily degradable and reaches the environment via waste water.

3.2.4 Some EU Member States have in place, or are in the process of developing, domestic legislation that prohibits the marketing and use of such azodyes. The European dyestuff industry has for a number of years operated a voluntary ban on the manufacture of such azodyes.

3.2.5 In the light of this, Directive 2003/3/EC was adopted on 6 January 2003 in order to harmonise the laws of the Member States and to protect the environment and human health by prohibiting the use of blue colourant and the placing on the market of articles coloured with blue colourant.

3.2.6 Directive 2003/3/EC, adapting for the 12th time Directive 76/769/EC, inserts a new point 43 and adds the substance blue colourant to those listed into Appendix to point 43. The provisions of the Directive concern the prohibition on the placing on the market for consumer use of articles coloured with these azodyes and the prohibition on the use of these azodyes in the manufacture of such articles.

3.2.7 Marketing of articles coloured with certain azodyes.

3.2.7.1 Point 43.3 prohibits the placing on the market or use for colouring textiles and leather articles as a substance or a constituent of preparations in concentrations higher than 0,1% by mass the Azo dyes which are contained in the listed of azodyes added to the appendix.

A list of the twenty two such aromatic amines and one azodye is given in the Appendix to Point 43.

Examples of textile and leather articles which “may come into direct and prolonged contact with the skin” are listed in Point 43.1 and include:-

- clothing, bedding, towels, hairpieces, wigs, hats, nappies and other sanitary items, sleeping bags,
- footwear, gloves, wristwatch straps, handbags, purses/wallets, briefcases, chair covers, purses worn round the neck,

- yarn and fabrics intended for use by the final consumer.

3.2.7.2 In order to allow for the recycling of textiles, which has overall benefits for the environment, these provisions do not apply to textile articles made of recycled fibres. This provision applies only if the listed amines are released by residues from previous dyeing of the same fibres, and if the listed amines are released in concentrations below 70 ppm. This exception applies until 1 January 2005.

4. REGULATORY IMPACT ASSESSMENT

REGULATORY IMPACT ASSESSMENT FOR THE EUROPEAN COMMISSION DIRECTIVES 2002/61/EC AND 2003/3/EC PROHIBITING THE MARKETING AND USE OF SOME AZOCOLOURANTS IN CERTAIN TEXTILE AND LEATHER GOODS

PURPOSE AND INTENDED EFFECT

Issue and Objectives

1. Azocolourants (which include both pigments and dyes) are used to colour, amongst other things, textiles and leather. They have the potential to break down into constituents called amines. Some of these amines are known to be carcinogenic. Directives 2002/61/EC and 2003/3/EC prohibit the marketing and use, in the manufacture of certain textile and leather goods, of those azodyes that can cleave (split) into one or more of the carcinogenic amines listed in the Annex to Directive 2002/61/EC and of the azodye (blue colourant) listed in Annex to Directive 2003/3/EC. The textile and leather goods affected are those that have the potential to come into direct and prolonged contact with human skin or the mouth: they include clothing, footwear and toys.

Risk assessment

2. The greatest risk of release of carcinogenic amines from azodyes occurs during the dyeing process and during the manufacture of dyed textiles and leather into consumer goods. However, the potential for worker exposure to the amines and thus any risk to human health is already regulated by the general duties in the Control of Substances Hazardous to Health Regulations (COSHH). Employers are under a duty not to use such hazardous substances at all or to control exposure such that workers are not put at risk. Carcinogenic amines can also be released from azodyed materials through skin contact (sweat can cause azodyes in clothes to break down) and ingestion (e.g. children sucking azodyed materials used in clothes or toys). Blue colourant has a high aquatic toxicity, is not easily degradable and reaches the environment via waste water. Although the actual risk of these azodyes is considered to be minimal, in principle it has raised concerns about the potential for consumer exposure and the environment.

OPTIONS

3. For a number of years the European dyestuff industry has operated a voluntary ban on the manufacture of azodyes that can cleave into the amines identified. As far as we can tell, this voluntary ban has operated very effectively and we are not aware of any manufacture of these azodyes within the European Union (EU). Additionally, we believe blue colourant is not used anywhere in the UK.

4. However, it is possible that affected azodyes manufactured outside the EU, or dyed leather and textiles and finished leather and textile goods produced there using these azodyes, may be being imported for marketing and use within the EU. This would present the risks of occupational and consumer exposure outlined in paragraph 2 above. We are aware that legislative action has been taken in India to ban the marketing and use of a number of azodyes, but it is unclear how rigorously this is being enforced.

5. Some other EU Member States already have domestic bans on the marketing and use of these azodyes. There was broad support among Member States for a harmonized EU-wide approach to the problem and the European Commission (EC) was anxious to achieve this in order to preserve the internal market. The EC Directives are consistent with current UK policy and practice on this issue therefore the UK supported the legislative ban rather than rely on the existing voluntary arrangements. Directive 2002/61/EC was adopted on 19 July 2002 and published in the Official Journal of the European Communities (OJ) on 11 September 2002 (OJ Ref L243/15). Directive 2003/3/EC was adopted on 6 January 2003 and published in the OJ on 9 January 2003 (OJ Ref L4/12).

INFORMATION SOURCES AND BACKGROUND ASSUMPTIONS

6. Information to derive the likely benefit and impact to society from implementing the EC Directives comes from the Statistics Directorate of the Department of Trade and Industry (DTI) and the Health and Safety Executive's (HSE) Policy Group¹. To estimate costs, 25 businesses and industry associations

¹ HSE prepared the initial RIA during negotiations on the European Commission's proposal (COM(1999) 620 final) and it has been updated in the light of the adopted Directives.

including 4 small businesses were contacted. There were 9 responses. The base year for appraisal is year 2002/2003.

BENEFITS

Health and safety benefits

7. As noted in paragraph 3. the voluntary ban on the manufacture of those azodyes that can cleave into the amines covered by Directive 2002/61/EC has operated very effectively and there is no known manufacture of the azodyes concerned within Europe. However, there are concerns that azodyes manufactured outside Europe, particularly in Asia and Africa, or textiles and leather dyed there using these azodyes, may be imported and used in the EU.

8. There is no evidence of these azodyes, or textiles and leather dyed using them, being imported into Great Britain (GB). However, it is possible that a small percentage of GB imports of textiles and leather from these countries may have been dyed using the azodyes concerned. In the event that between 1% and 5% of these imports have been dyed using azodyes, between 600 and 3000 metric tonnes of the textiles and leather (£2.4 - £11.9 million in 2002/2003 prices) that are imported into Great Britain each year may contain one or more of the azodyes affected by the prohibition¹.

9. British companies also import finished products from countries outside the EU. The products that may have been produced using the azodyes affected by the prohibition that are most likely to have a health impact are clothing, footwear and bed linen. If we again assume that between 1% and 5% of the imports contain the affected azodyes, between 2,000 and 11,000 metric tonnes of the clothing and footwear (£19.9 - £99.5 million in 2002/2003 prices) that are imported into Great Britain each year could contain one or more of the azodyes concerned.

10. When the Directive is transposed into UK law the possible negative health effects to UK workers and consumers resulting from contact with such imports

¹Information on UK imports of textiles and leather goods was supplied by the Statistics Directorate of the Department of Trade and Industry. Northern Ireland imports were assumed to be about 2.3% of total UK imports.

be eliminated. However, we do not have information on the current negative health impact of azodyes in Great Britain. Therefore, such benefits are unquantifiable.

COSTS

Business sectors affected

11. The companies in Great Britain that would be affected by the prohibition are those involved in the import, production or sale of certain textiles, leather and associated goods and manufacture of azodyes. The textiles and leather products concerned include:

clothing, bedding, towels, hairpieces, wigs, hats, nappies and other sanitary items;

footwear, gloves, wristwatch straps, handbags, purses/wallets, briefcases, chair covers, purses worn around the neck;

textile or leather toys and toys which include textile or leather garments; and

yarn and fabrics intended for use by the final consumer.

Compliance costs to business

12. The purpose of Directive 2002/61/EC was to substitute an existing voluntary ban with enforceable law. HSE estimates that in Great Britain there is almost complete compliance with the voluntary ban. Information from the companies and industry associations contacted suggests that most companies are not importing goods that may have been dyed with the listed azodyes. All but one company claimed the prohibition would not affect their importation of leather and textile goods.

13. For any companies still using these azodyes, substitutes for them are readily available and switching to these is not expected to have any impact on sales. Indeed, one large retail company reported that they could pass on the extra cost to consumers without any reduction in sales.

14. However, there may be some cost implications of industry compliance with the prohibition. British firms importing either dyed textiles and leather for manufacture into goods covered by the prohibition, or finished textile and leather goods, would - if challenged by the regulatory authorities - need to be able to

demonstrate that their products are free from the azodyes covered. British importers can, in the first instance, seek confirmation of this from their overseas suppliers.

15. If this evidence cannot be obtained from the overseas supplier then it will be necessary for the British company to test the material concerned, using the test method developed by the European Commission, to show that banned azodyes have not been used. The testing procedure results in the destruction of a sample of the leather or textile and costs between £105 and £126 per test.

16. It is difficult to estimate the cost to British industry of performing such tests. If British importers can secure reliable evidence from their overseas suppliers that their products do not contain azodyes affected by the prohibition then they will not need to conduct tests themselves. The extent of the need for testing will also be partly determined by the composition of imports into Great Britain. A company importing a large consignment of identical items would only need to conduct one test; a consignment containing a variety of items made from different fabrics or dyed in different colours might necessitate several tests. One company has estimated a need for approximately 144,000 tests per annum. We attempted to estimate these costs for all businesses concerned but were unable to obtain sufficient data. The cost of testing is therefore unquantifiable.

17. Failure to pass a test for one of the azodyes covered by the prohibition would mean that a British company could not sell the product in the EU. If the illegal items could not be returned to the supplier then the British company could be faced with substantial costs. It may also face the additional cost of having to source a new supplier. We have been unable to obtain information on either of these potential costs and so they are also unquantifiable.

18. There may also be some potential costs arising from the inclusion of 4-aminoazobenzene to the list of substances. Information from the British leather industry suggests that there is no test that can unequivocally identify whether or not this substance has been used in dyeing leather. As a consequence, a large number of false positives may result from testing. It has not been possible to estimate the likely cost to industry. One industry source has indicated it could be substantial and disproportionate to the risk. However, the European Commission has stated that this substance is not widely used in dyeing materials.

19. The purpose of Directive 2003/3/EC is to address environmental concerns. Blue colourant has a high aquatic toxicity, is not easily degradable and reaches the environment via waste water. However, as previously stated blue colourant is not manufactured or used in the UK and so there are no compliance costs for industry.

Costs to Government Department

20. There are not expected to be any additional costs.

Total costs to society

21. Owing to the existing voluntary ban on the manufacture of these azodyes in the EU, any usage of them in Great Britain in the manufacture of textile and leather goods is thought to be minimal. Substitutes for these azodyes are already available at little additional cost; any company still using azodyes that will be prohibited would experience little difficulty or expense in switching to a substitute product. One of the companies contacted reported that they did not expect the small extra cost to have any impact on their sales. Consumers may face an additional cost if companies raise their prices in order to pay for substitute dyes, but we believe that any such increase would be negligible in relation to the total cost of the finished product.

22. Some British firms may need to pay for their imported supplies to be tested if they cannot secure confirmation from their suppliers that the goods do not contain azodyes affected by the prohibition. Some firms may also need to find alternatives if their current supplies of ready-dyed goods are found to contain the affected azodyes. These may also result in costs that may be passed on to the consumer, which we have been unable to quantify.

IMPACT ON SMALL BUSINESSES, CHARITIES AND VOLUNTARY ORGANISATIONS

23. In order to establish the effects of the prohibition on small businesses, during negotiations, four companies were contacted. One company explained that it began using substitutes for these azodyes two years ago and as a result it could see no additional costs of making the voluntary ban legally binding. A second company stated that the prohibition may have an impact on its sales in non-EC countries and that a legal ban may well force them to drop many lines. This is despite the fact that

the company tries to avoid using dyes covered by the voluntary ban whenever possible. If small companies were currently using azodyes covered by the voluntary ban then a legally binding prohibition would have a disproportionate effect on them. However, substitutes for the azodyes affected are available at little extra cost and a legal ban is unlikely to cause small firms to remove products from the market since costs can be passed on to consumers with only a minimal impact on sales.

24. One charity organisation contacted was unable to estimate the proportion of its products that may be affected by the prohibition. They indicated that some of their suppliers will be able to use substitutes and some will not. The organisation would be forced to stop using any supplier who could not meet the legal requirements. They wished to emphasise that this would be counter to their objective of 'sustainable livelihood'.

ENVIRONMENTAL IMPACTS

25. The adopted Directives are not expected to have any impact on the environment. In the UK, bluecolourant is not manufactured or used so the environmental benefits have been realised.

BALANCE OF COSTS AND BENEFITS

26. For the vast majority of companies working with leather and textiles, the prohibition will not impose any extra cost. If some of the current imports of textiles and leather goods have been dyed using these azodyes, the prohibition will reduce the negative health impact due to exposure to these products. During negotiations on the EC's proposal, the initial RIA was revised, however given the paucity of information available, we concluded that further effort to estimate more detailed cost and benefits was unlikely to be justified.

Uncertainties

27. The greatest uncertainty concerns the quantity of textiles and leather containing azodyes that are currently imported into Great Britain. Although we have no evidence of any such imports, it is possible that a small number are entering Great Britain. The quantity of such imports would have implications on the size of the health benefits to be gained from adopting the EC Directives. There is also

uncertainty surrounding the total cost to British industry of testing imports of textiles and leather goods that may have been dyed using these azodyes.

ENFORCEMENT, SANCTIONS, MONITORING AND REVIEW

28. The enforcement arrangements and sanctions are set out in the draft SI at Annex C. The implementing regulations will be monitored and reviewed in accordance with normal procedures - a review is likely once the implementing regulations have been in force for 2-3 years.

30 July 2003

5. ANNEXES

Annex A: Directive 2002/61/EC (azocolourants)

Annex B: Directive 2002/61/EC ('blue colourant')

Annex C: Draft of proposed '*Controls on Azodyes Regulations 2003*'

Annex D: List of Consultees

DIRECTIVE 2002/61/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 19 July 2002

amending for the nineteenth time Council Directive 76/769/EEC relating to restrictions on the marketing and use of certain dangerous substances and preparations (azocolourants)

COMMISSION DIRECTIVE 2003/3/EC

of 6 January 2003

relating to restrictions on the marketing and use of 'blue colourant' (twelfth adaptation to technical progress of Council Directive 76/769/EEC)

DRAFT

PROPOSED REGULATIONS

THE CONTROLS ON AZODYES REGULATIONS 2003

LIST OF CONSULTEES

LIST OF CONSULTEES

This Consultation Document has been sent to the following interested parties:

Alders plc.
Arcadia Group plc.
Association of British Chambers of Commerce
Association of County Public Health Officers
Association of Independent Businesses
Association of Local Authorities of Northern Ireland
Association of Public Analysts of Scotland
B&Q plc.
Bond Street Association
Boots-Product Quality and Development Centre
British Apparel and Textiles Confederation
British Association for Chemical Specialities
British Chemical Distributors & Traders Association
British Colour Manufacturers' Association
British Colourmakers Association
British Footwear Association
British Glove Association
British Hat Guild
British Heart Foundation
British Home Stores
British Importers Federation
British Interior Textiles Association
British Leather Confederation
British Medical Association
British Red Cross
British Retail Consortium (2)
British Safety Council
British Shops & Stores Association
British Textile Fibres Association
British Toy and Hobby Association
Brunel University (Professor Geoffrey Woodroffe)
BSI Group Headquarters
BSI Product Services
CEH (Centre for Ecology & Hydrology)
CIA (Chemicals Industries Association) (2)
CMS Cameron McKenna (Mr Christopher JS Hodges)
Confederation of British Industry
Consumers Association
Consumers in the European Community Group
Convention of Scottish Local Authorities
De Monfort University (Professor David Oughton)
De Montfort University (Mr Chris Willet)
Debenhams Retail plc
Department of Health
Direct Selling Association
DOENI (Dept. for the Environment in Northern Ireland)
Environment Agency (Chemicals Assessment Unit)
ETAD
Friends of the Earth
General Consumer Council for Northern Ireland
Greenpeace
House of Commons Library (Economic Affairs Section)
Health and Safety Executive
Health and Safety Commission
Home Office (CBRN)
House of Commons Library (Deposited Papers)
House of Lords Library
House of Fraser
Imperial Cancer Research
Intertek Testing Services (Leicester) Ltd.
Institute of Consumer Advisers
Institute of Home Safety
Jennifer Brave (Retail & Consumer Law Consultant)
John Lewis Partnership
Kensington High Street Association
KFAT
LACORS
Law Commission (Professor Hugh Beale)
Leather Goods Association
LGC Ltd. (Mr Ian Axford)
Local Government Association
LSE (Mr Colin Scott)
LSE (Professor Hugh Collins)
Mail Order Traders Association
Manchester University (Mr Richard Bragg)
Marie Curie Cancer Care
Medical Research Council
Morton International Ltd
Mr Tony Sagar
National Association of Local Councils
National Association of Shopkeepers
National Chamber of Trade
National Federation of Consumer Groups
National Consumer Council
NAWAD (National Assembly for Wales Agriculture Dept.)
Northern Ireland Association of Citizens Advice Bureaux
Northern Ireland Chamber of Commerce & Industry
Northern Ireland Office
Northern Ireland Safety Council
Nottingham Trent University (Mr Christian Twig-Flesner)
OXFAM
Royal Society for the Promotion of Health
Satre Quality Assurance, Kettering
Scottish Consumer Council
Scottish Office
SEERAD
Selfridges
Shelter
Society of Directors of Trading Standards
Society of Dyers & Colourists
Society of Local Authority Chief Executives
Somerville College, Oxford (Professor Stephen Weatherill)
St John's College, Oxford (Mr Simon Whittaker)
Sue Ryder Care
Textile Finishers Association
TGWU Textile Group
Trading Standards Institute
Trades Union Congress (TUC)
UCATT (2)
University of Dundee (Mr Cowan Ervine)
University of Hull (Ms Deborah Parry)
University of Nottingham (Mr Peter Cartwright)
University of Sheffield (Mr Robert Bradgate)
University of Sheffield (Professor Geraint Howells)
Welsh Consumer Council
Welsh Office
World Wildlife Fund (WWF)

THE CONSULTATION CRITERIA

- 1. Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left for it at each stage.*
- 2. It should be clear who is being consulted, about what questions, in what timescale and for what purpose.*
- 3. A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain.*
- 4. Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others) and effectively drawn to the attention of all interested groups and individuals.*
- 5. Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for a consultation*
- 6. Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and the reasons for decisions finally taken.*
- 7. Departments should monitor and evaluate consultations, designating a consultation co-ordinator who will ensure the lessons are disseminated.*

The complete code is available on the Cabinet Office's web site, address www.cabinet-office.gov.uk/servicefirst/index/consultation.htm.

COMMENTS OR COMPLAINTS

If you wish to comment on the conduct of this consultation or make a complaint about the way this consultation has been conducted, please write to Mr P Martin, DTI Consultation Co-ordinator, Room 725, 1 Victoria Street, London SW1H 0ET or telephone him on 020 7215 6206 or email philip.martin@dti.gsi.gov.uk.

URN 03/1059