

Leather Goods Notified to the Rapex System in the Years 2004-2017 – Notification Analysis for Countries of Manufacture and Notifying Countries

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Summary

This paper analyses information pertaining to notifications of unsafe leather goods submitted to the EU Rapid Exchange of Information System (RAPEX) in the years 2004-2017. The number of leather goods reported in the system has been compared to total number of notifications on dangerous products classified in the category 'Clothing, textiles and fashion items' that includes leather goods. The notifications were analysed for the country of origin of leather goods as well as for the notifying country. This allows identification of countries from which the largest number of dangerous leather goods come, *i.e.*, China, India and Pakistan, as well as countries most active in detecting them in their own domestic markets, *i.e.*, Germany, Spain and Estonia.

The article presents also results of surveys related to opinions of Polish consumers towards the safety of leather goods they purchase as well as their awareness about the presence and functioning of the RAPEX system. The research showed that most of Polish consumers cannot clearly indicate whether the leather goods they buy are safe for health or not. Moreover, most of Polish customers have no knowledge of the presence and functioning of the RAPEX system.

INTRODUCTION

The EU rapid alert system (RAPEX) is a tool primarily aimed at preventing customers from using a dangerous product by efficient notification that such product was found on the market. Dangerous leather goods notified in the RAPEX system fall into the category 'Clothing, textiles and fashion items' that besides textiles includes also plastic and other products. From the beginning, *i.e.*, 2004 (week 6) to the end of 2017 (week 51) a total of 4,534 notifications in this category were recorded, including 324 notifications on leather goods, that is only approximately 7% of all notified products.

As follows from previous analyses¹ the dangerous leather products notified through the RAPEX system include primarily footwear (both for children and adults) as well as gloves, gallantry, clothing and jewellery. The main reason that these products are recorded in the RAPEX system is the presence of excessive amounts of dangerous substances in the products or their parts (*e.g.*, leather insoles). The list of substances includes chromium(VI), dimethyl fumarate, formaldehyde, pentachlorophenol or aromatic amines that pose a risk referred to as 'chemical'. In a few cases hazards to consumers may result from improper leather footwear design, *i.e.* 'health risk/other'.

Aside from information of risk types, RAPEX contains also information about the level of risks according to the RAPEX dangerous product risk assessment guidelines.² Starting from 2005, the notified products are classified into two groups indicating risk severity – 'serious' and 'other'. Among 324 notified leather goods, the level of risk for 322 of them was denoted as 'serious', while for the remaining two notifications (sent in 2004) no detailed information was provided.

In the years 2004-2017, a successive transformation of the RAPEX system could have been observed. The activities were focused mainly on improving the quality of information on dangerous products. According to the data contained in the RAPEX Annual Report³ the changes introduced referred mainly to:

- standardization of notification form used for submitting notifications on dangerous products,
- collection of more detailed information on dangerous products,
- improvements in product origin identification.

According to RAPEX reports,^{3,4} those activities lead to rapid and unambiguous exchange of information on hazardous products. A steady progress of the system functionality is manifested by the increased activity of European countries in notification on products that pose consumer health risks.

This article is a continuation of previous studies.¹ The main goal of this paper is to analyse notifications of leather goods in the RAPEX system with respect to countries that introduced dangerous products onto the European markets, and countries that showed the highest activity in notifying and removing dangerous products from their markets. In addition, the paper presents the results of surveys related to opinions of Polish consumers towards the safety of leather goods they purchase as well as their awareness about the presence and functioning of the RAPEX system.

Countries of origin of dangerous leather goods notified in the RAPEX system

Dangerous leather goods notified in the years 2004-2017 came from 32 countries, among 102 countries

listed on the RAPEX website. These countries along with the number of notifications are presented in Figure 1. Leather goods that posed a hazard to the health and life of consumers came primarily from China and they shared as much as 173 notifications, that is approx. 53% of all notified leather products. The countries accounting for at least 10 dangerous products include also: India, Pakistan and Italy (38, 18 and 10 notifications, respectively). 2 notified products came from Poland (approx. 0.6% of all notifications). There were 22 notifications with unknown country of origin (Fig. 1). There was only one notification (man's shoes notified in 2005) for which two countries of origin were specified, India and Pakistan. For the remaining notifications one place of origin was indicated.

The numbers of notifications in individual years (2004-2017) related to the three countries reported as the main sources of hazardous products – China, India and Pakistan – are shown in Figure 2. The highest number of products of Chinese origin notified via RAPEX was recorded in 2013 (41 notifications), while from 2015 till now a decreasing trend in respective notifications can be observed. As follows from the RAPEX report⁵ the high number of notified products coming from China, does not result from a deterioration of quality of these products, that still remains at a constant level, but rather from the significant penetration of Chinese products on European markets. The export scale of Chinese products into European markets stimulates a better control.

The decreasing number of Chinese products notified in the RAPEX system from 2015, can be explained by gradual changes in the structure of the Chinese market. The Chinese leather industry was oriented on domestic demand, while impairing exports. According to the Chinese Leather Industry Association (CLIA) in 2016 the retail sales increased by 11% in comparison to 2015. The growing demand for natural leather results

from a booming automotive industry in China. In 2016 China's leather goods exports dropped 11.3% year to year, while footwear exports fell by 17.8%.⁶

The number of dangerous leather goods manufactured in India was considerably smaller than that of China, but still significant. The first notifications on dangerous leather goods coming from this country were reported in 2009, and the highest number (10 notifications) was recorded in 2016. Pakistani leather goods appeared in the RAPEX system in 2012. From 2014 in three consecutive years the number of notifications increased and reached the maximum value in 2016 (6 notifications) (Fig. 2). A slight decrease was noted in 2017. In total, approx. 71% of notified dangerous leather goods in the RAPEX system came from China, India and Pakistan.

Countries notifying dangerous leather goods in the RAPEX system

Notifications of dangerous leather goods in the years 2004-2017 came from 15 countries, among 32 countries listed on the RAPEX website. These countries along with the number of submitted notifications are presented in Fig. 3. The most active country making notifications on leather goods to the RAPEX system is Germany (180 notifications, accounting for approx. 56% of all notifications). More than 10 notifications on dangerous leather goods were sent also by Spain, Estonia, France, Hungary and Bulgaria (55, 20, 16, 14 and 13 notifications, respectively). Poland made no notifications in the years 2004-2017.

The numbers of notifications made by the three most active countries - Germany, Spain and Estonia - which can be assigned the highest activity in notifying dangerous leather goods are presented in Figure 4. The number of notifications sent by Germany prevails significantly. The number of products notified by this

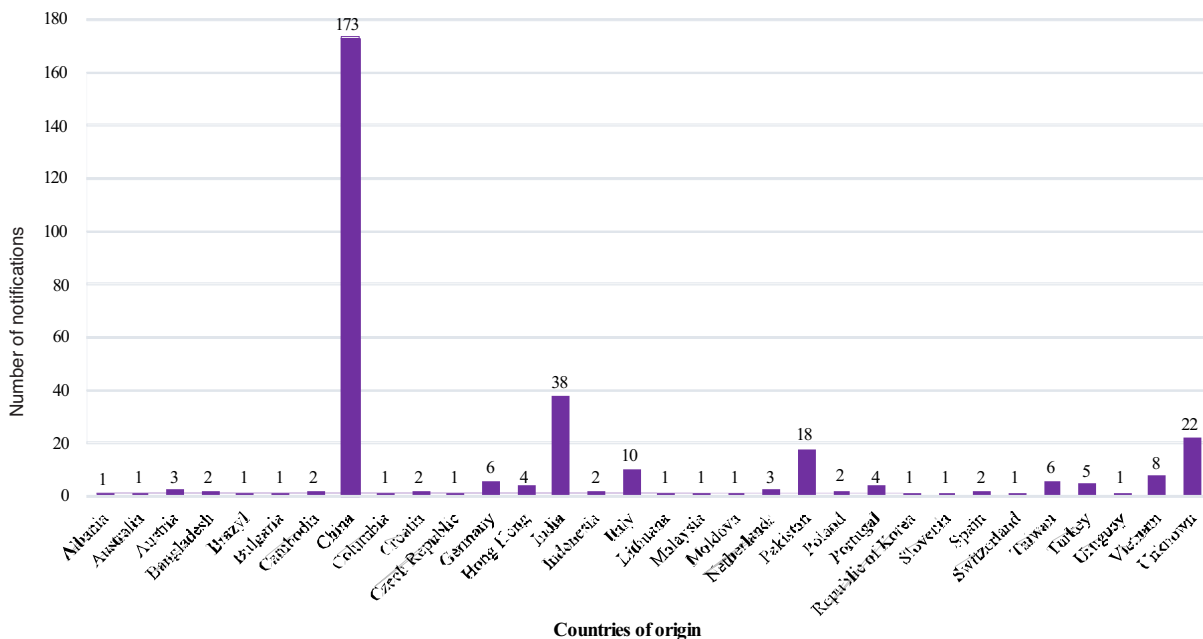


Figure 1. Countries of origin of leather goods notified in the RAPEX system.

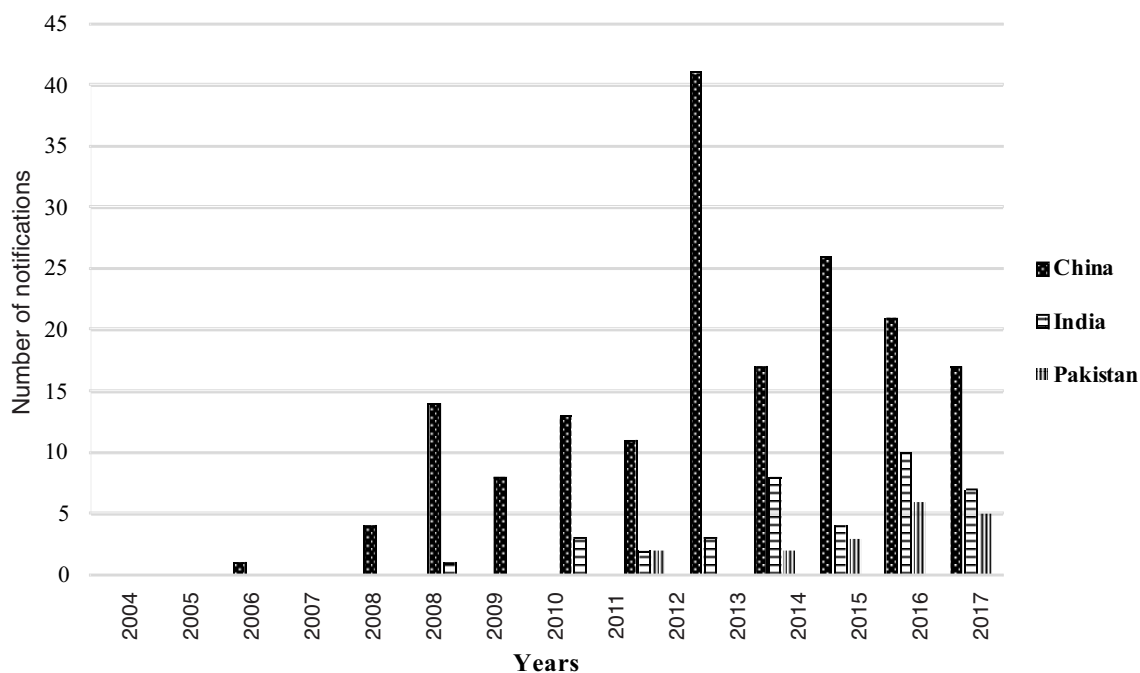


Figure 2. Countries manufacturing leather goods most often notified in the RAPEX system in the years 2004-2017.

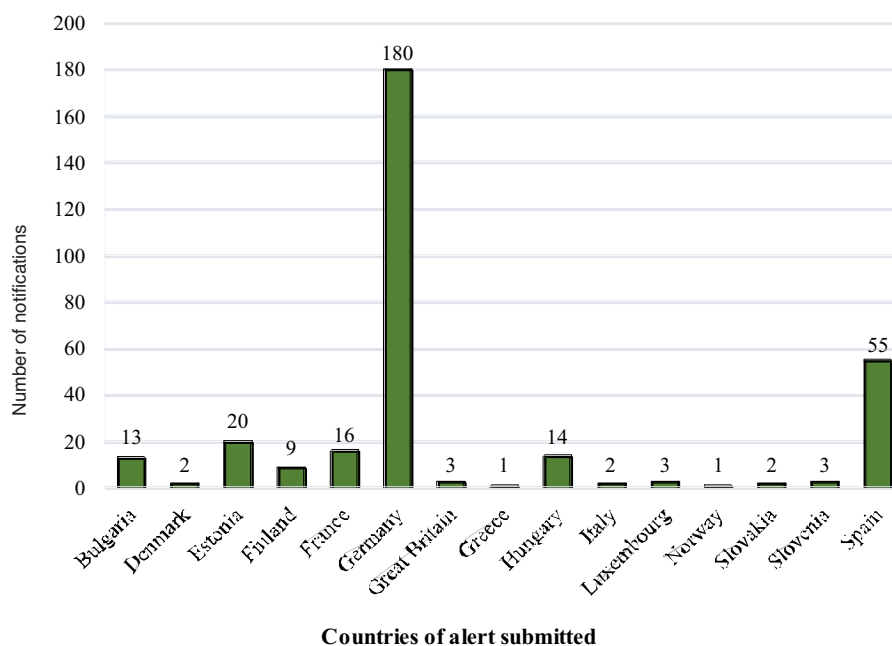


Figure 3. Countries notifying leather goods to the RAPEX system.

country grew steadily from 2009 to reach the maximum in 2013 (46 notifications). Since then, this number has decreased (with exception of 2016, when a slight increase in the number of notifications was recorded).

The first notifications of leather goods submitted by Spain were recorded in 2009, while the highest activity in notifying was in 2014 (16 notifications). After that, the number of notifications made by this country decreases. The number of notifications submitted by Estonia increases slightly from 2011, with an exception of 2014, when no notification was made, and 2016, when a decrease in the number of notifications was observed. The largest number of notifications made by

this country was recorded in 2017 (8 notifications) (Fig. 4). In total, Germany, Spain and Estonia accounted for approx. 79% all notifications on dangerous leather goods to the RAPEX system in the years 2004-2017.

The large differences observed in activity of countries notifying unsafe products result from several factors. In the early years of the RAPEX system, the participation of individual countries was neither complete nor consistent, mainly because of the lack of standardisation of dangerous product notification procedures.⁷ In the later years, the requirements for product identification in the rapid alert system for dangerous products have been made clearer and

harmonised, thus facilitating both information flow and collecting data for products for which the safety in use has been questioned.⁸

A gradual increase in the activity of European countries in notifying products is undoubtedly connected to enforcement of legal provisions governing product safety issues. As an example, consider the observed increase in the number of products notified in the category 'Clothing, textiles and fashion items' by various Member States of the EU after restrictions on placing or making available on the market products containing the biocide dimethyl fumarate according to the EU Commission Decision 2009/251 of 17 March 2009.⁹ In 2008 the number of such notifications accounted for 9% of all notifications, and in 2009 the ratio increased to 23% of all notifications in this category.^{10,11}

The active participation of countries in notifying dangerous products (Figs. 3 and 4) can result also from increasing awareness of their duties among entrepreneurs. Differences in numbers of notifications between countries under investigation could also be explained by their size, market and production structures, export and import scales, and changing economic situation.¹¹ An example is the German market. Since 2015 a significant increase in foreign trade turnover in leather products has been observed. The most important leather goods importers are: Austria, France, the United Kingdom, Switzerland, Italy, the Netherlands and Czech Republic. In 2016, compared to past years, export of German leather goods has increased considerably (by 30%), also to China, South Korea and Hong Kong. At the same time, import of leather products from China has decreased,¹² and this probably caused a decrease in the number of dangerous product notified in recent years (Fig. 4).

A relatively low activity of Italy in notifying dangerous products (Fig. 3) may be a result, to some extent, of

stagnation in Italian footwear industry in years 2008-2014.¹³ Poland, like many other countries, made no notification in the years 2004-2017. Such a situation may result from many factors, including market structure, and the consumer awareness regarding potential hazards from goods released for free circulation and available in the market.

The surveys on Polish consumer awareness about the safety of leather goods and the presence and operation of the RAPEX system

To acquire information on Polish consumer awareness about the safety of leather goods and the presence and operation of the UE rapid alert system (RAPEX) a survey was conducted among 123 respondents. The anonymous direct survey was conducted by using paper questionnaires; respondents were selected randomly.

The survey questionnaire was filled in by 59 females (48%) and 64 males (52%). 41% of the respondents were in the age of 19-35 years, 33% of the respondents were under 18 years, 24% were in the age of 36-65 years, and 2% of the respondents were over 65 years old. The respondents came primarily from villages (42%) and cities with more than 500,000 inhabitants (40%); the remaining 18% came from towns with a population of less than 500,000. The respondents declared the status of pupil/student (54%), employee (43%), and pensioner/retired (3%). When analysing respondents' answers on income statement a diversification was noted. More than half of them (62%) stated that their average monthly income was 1,000 - 3,000 PLN per person. About 28% of the respondents declared their average monthly income above 3,000 PLN per person, while 10% of them declared less than 1,000 PLN per person (the gross national average in Poland, according to Statistic Poland, was 4,973 PLN in 2017).¹⁴

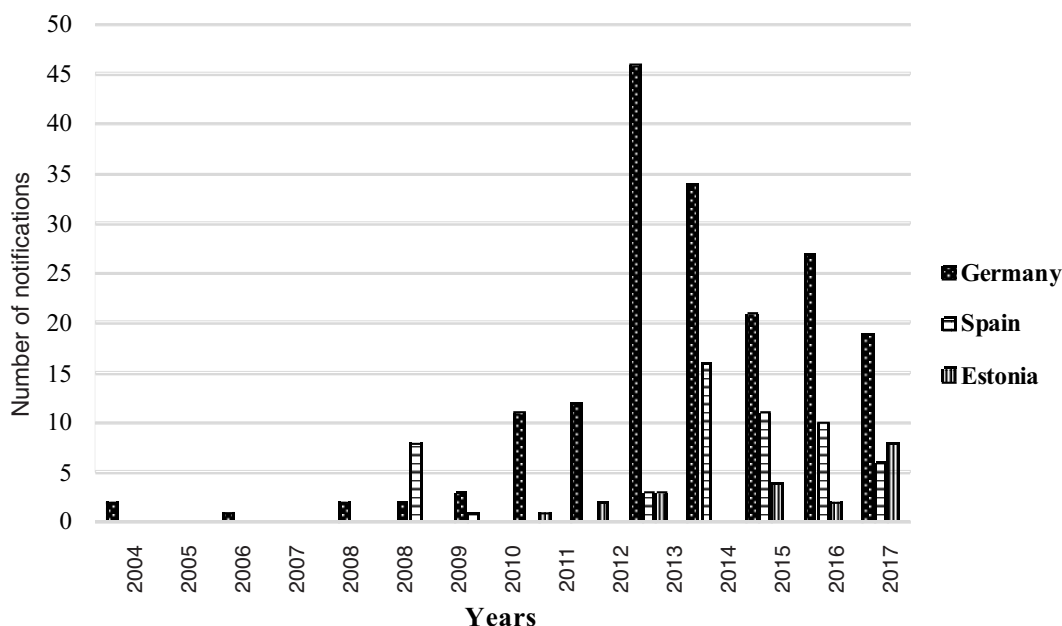


Figure 4. Countries most frequently notifying leather goods in the RAPEX system in the years 2004-2017.

73% of respondents answered positively to the question 'do they buy leather goods available in the market'. These persons were asked in the following multiple-choice question to indicate the leather goods they buy most frequently. Among the respondents 49% persons checked 1 answer, while 51% selected more than one answer. Footwear is the leather product that is most frequently bought by Polish consumers (91% of the respondents) (Fig. 5). Gallantry (*i.e.* handbags, briefcases, suitcases, kitbags, wallets, belts) was bought by 37% of the respondents, gloves by 36%, while much fewer people decided to buy leather clothing (16%), or jewellery (only 3% of the respondents). Among answers the respondents could also check the 'other' option and give an example of leather product different than the listed ones, that they buy most often. This answer was checked by 2% of the respondents, while specifying no example.

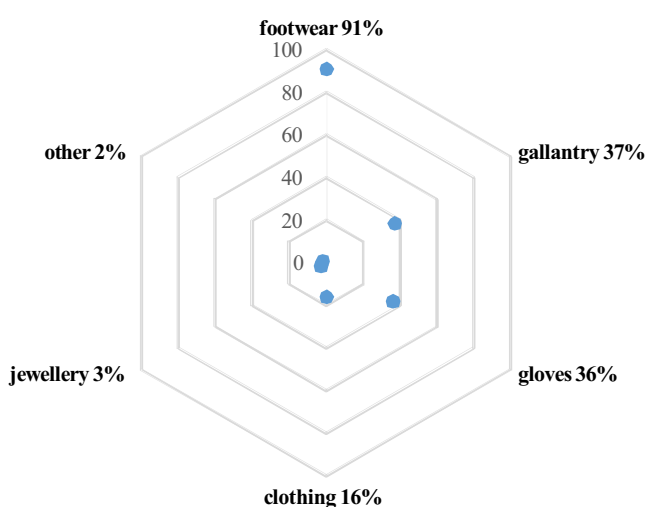


Figure 5. Leather goods bought most frequently by Polish consumers.

For non-food products an important question is the safety in use. This problem has been examined thoroughly for many years. As examples consider papers by Turek (2004)¹⁵ and (2005)¹⁶ pertaining to the safety of toys usage. Safety questions are also of utmost importance for leather goods used not only by adults but also children, like for toys. The studies carried out confirmed that the safety of leather goods, including footwear amongst other, also children shoes, was questioned repeatedly.¹

The survey respondents who buy leather goods were asked if the products available in the market do not pose any hazard to the health of users. 35% of the respondents said that not all products released for free circulation are safe, while 22% of the respondents answered that in their opinion all such products are safe. Most of the 90 respondents (43%) had no opinion on the matter.

All of the 123 respondents were also asked if they knew the EU Rapid Alert System (RAPEX). The vast majority of the respondents (97%) answered negatively, while only 3% of the respondents (employed, highly educated people) gave positive

feedback. These persons were also able to explain the system.

These data indicate that leather goods attract much attention from Polish consumers, despite their relatively high prices. In particular, this applies to footwear, gallantry and gloves. However, most Polish consumers cannot express their opinion on the safety of products they buy.

The results of survey confirm that Polish consumers have no awareness about the presence of the RAPEX system. Maybe such knowledge could help them to take a stance on the safety and quality of leather goods available in the market. It is also important to make consumers aware of these issues and to increase their alertness to products, not only those made of leather, that they buy.

CONCLUSIONS

Based on the data available on the RAPEX websites, in the literature and information gained from the survey conducted it is possible to conclude that:

Leather goods account only for about 7% of notifications on products which safety has been questioned in the category 'Clothing, textiles and fashion items', in years 2004-2017.

Dangerous leather goods notified in the RAPEX system in the years 2004-2017 were manufactured mainly in China (53%), India (12%) and Pakistan (6%).

In the years 2004-2017 the highest activity in notifying leather goods was shown by Germany (56%), Spain (17%) and Estonia (6%).

The factors that influence the number of notifications of leather goods in the RAPEX systems include:

- the scale of export from Asian countries to the target markets,
- intensification of inspection of products coming into European markets,
- implementation of restrictions and provisions governing the safety of products.

A growing activity of countries notifying dangerous products through the RAPEX system is related to:

- increasing effectiveness of authorities responsible for market surveillance,
- increasing entrepreneur awareness of their duties.

Most Polish consumers cannot clearly indicate whether the leather goods they buy are safe for health or not.

Vast majority of Polish customers have no knowledge of the presence and operation of the RAPEX system.

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