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AAFA publishes Restricted Substance List (RSL) Release 9



On 30 September 2011, the American Apparel and Footwear Association (AAFA) published the ninth version of its Restricted Substance List (RSL 9)¹. This RSL was consolidated by a special working group of AAFA Environmental Task Force and is intended to provide up-to-date regulatory information for textiles and footwear industries.

The latest version has been revised to include restrictions from more countries and regions such as China, Taiwan and Norway, as well as updated the changes in REACH and CPSIA. A detailed list of changes from RSL 8 to RSL 9 can be found on pages 34 and 35 of the RSL. The major changes in RSL Release 9 are summarised in Table A. ■

¹Visit the AAFA's webpage on the 9th version of the RSL at <https://www.wewear.org/assets/1/7/AAFARSLFinalRelease9.pdf>

Softlines, Hardlines and Toys & Children Products

New EU cadmium restrictions to enter into force in December 2011

We would like to remind our readers that the new cadmium restrictions under REACH will enter into force on 10 December 2011.

The new restrictions, which were published in Regulation (EU) No 494/2011, are an amendment to the current cadmium restrictions under Annex XVII of REACH. The changes affect plastic materials and plastic

Table A: Major Changes in RSL Release 9

Subject	Major changes
The REACH Regulation	The SVHC candidate list has been updated from 46 to 53 substances in Appendix I
CPSIA	The requirement of total lead in substrate for leather, metal, plastic, and plastic films is now changed from 300 ppm to 100 ppm after August 14, 2011. The test method of total lead in surface coatings and printings is changed from CPSC-CH-E 1003-09 to CPSC-CH-E 1003-09.1
Washington state (USA) – Children's Safe Product Act	This act is newly added to Appendix I – for reporting obligation by manufacturers in 2012
Taiwan's chemical requirements for textile and footwear	The restricted chemicals, organotin, arylamines for textile according to CNS 15290, soluble lead for textiles products, soluble cadmium for metal parts according to CNS 15920, formaldehyde for textiles, leather, and indoor decorative textiles are newly included
Norway's chemical requirements for textile and footwear	Dimethylfumarate (DMFu), PFOS, blue colorant, arylamines and asbestos are added as restricted chemicals
GAFTI comments	Restrictions recommended by the new Global Apparel, Footwear and Textile Initiative (GAFTI) are added. GAFTI is an independent, self governing association that produces recommended testing standards for certain chemicals.

products, wet paint and painted articles, brazing fillers, jewellery, as well as construction articles made from recovered PVC.

For the details regarding these restrictions, please see our news article in Retail E-ssentials Vol. 28 at https://www.tuv-sud.in/APMKT/pdf/retail_E-ssentials_v28_06-2011.pdf. ■

www.tuev-sued.com/softlines
www.tuev-sued.com/toys

Softlines

Chromium (VI) in leather products becomes a product safety concern in EU

Chromium (VI) is a well-known allergen that causes dermatitis. This chemical is commonly found in leather goods as residues from the leather tanning process and is becoming a concern in consumer product safety in Europe as shown by the number of cases of leather goods reported in RAPEX (The EU Rapid Alert System for Non-Food Products)¹. Recently, the Danish Ministry of the Environment published a study² on the health assessment of chromium in leather shoes, while earlier this year, the Swedish Chemicals Agency (KEMI) carried out a survey³ on chromium (VI) in protective and fashion leather gloves sold on the Swedish market.

Background information

Leather tanning is the process of converting raw hides or skins into leather, with chromium salts such as chromium (III) sulphate commonly used to stabilize the proteins in the leather against degradation. Although chromium (VI) is not used as a tanning agent, chromium (VI) can also be found in leather products as the chromium (III) present can be converted into chromium (VI) at specific conditions such as low pH value and high moisture conditions.

Both chromium (III) and (VI) are allergenic, with chromium (VI) being a stronger allergen. Contact allergy occurs when chromium compounds penetrate the skin and activate the immune system. Hence, residues of chromium compounds in leather products are always a concern especially for those products that come into direct contact with the skin.

Survey of chromium (VI) in leather shoes by the Danish Ministry of the Environment

The study aimed at investigating the levels of chromium (III) and (VI) compounds released from leather shoes sold in Denmark and whether these constitute a risk of allergy. Sixty-three pairs of shoes of different categories (ladies, men, and children), types (sandals, boots, and ordinary shoes) and price ranges were purchased from various shoe stores and supermarkets. The shoes were subjected to XRF screening for chromium content and/or migration analysis for chromium (VI) content using ISO 17075. The upper and insole of the shoes were selected since these parts are in direct contact with the skin.

Fifty of the sixty pairs of shoes which underwent XRF screening were found to contain 1-3 % of chromium in the upper leather. Out of the eighteen pairs of shoes that were selected for chromium (VI) migration testing, eight of them were found to contain chromium (VI) at concentrations between 3 and 62 ppm. The results showed no correlation between the level of chromium compounds and shoe categories, types or price ranges. However, the study emphasized the concern on sandals since they are likely to be worn with bare feet

¹ Visit the RAPEX webpage at http://ec.europa.eu/consumers/dyna/rapex/rapex_archives_en.cfm

² Download the study by the Danish Ministry of the Environment (in English) from <http://www2.mst.dk/udgiv/publications/2011/08/978-87-92779-22-9.pdf>

³ Read a summary of the survey by the Sweden Chemical Agency (KEMI) (in Swedish) at <http://www.kemi.se/en/Content/Enforcement/Inspection-projects/Analysis-of-hexavalent-chromium/>



and the upper leather is in direct contact with the skin. The study also highlighted shoes releasing low levels of chromium (VI) may also pose a risk of chromium allergy since migration of chromium is influenced by usage conditions.

Study on chromium (VI) in gloves by the Swedish Chemicals Agency (KEMI)

A study was carried out by KEMI earlier this year on the concentration of chromium (VI) in thirty-one pairs of protective and fashion gloves purchased from hardware stores and clothing stores. A concentration of 3-52 ppm of chromium (VI) was found in twelve pairs of these gloves, indicating leather gloves available on the Swedish market contain chromium (VI) levels that can cause allergenic symptoms. While the chemicals agency only urged those companies which sold the gloves with chromium (VI) to report their corrective actions, some of the companies voluntarily withdrew their products from the market.

Restriction of chromium (VI) in Europe

Currently, there is no specific restriction on chromium (VI) for consumer products at the EU level and the restriction of chromium (VI) compounds under REACH Annex XVII is applicable only to cement and cement-containing mixtures. In September 2011, Denmark proposed to restrict chromium (VI) compounds in leather articles under the REACH regulation. The proposal dossier will be submitted in January 2012.

In other European countries, Germany has already enforced the restriction of chromium (VI) in leather goods under the German Consumer Goods Ordinance (Bedarfsgegenständeverordnung). Sweden, Germany, and Bulgaria have reported cases of leather goods such as clothing, gloves and footwear with unsafe levels of chromium (VI) under the safeguard of the EU General Product Safety Directive (GPSD) in RAPEX. ■

REACH draft appendices 1-6 and 11 now available

In its meeting on 27-28 September 2011, the European Commission's REACH Committee agreed on the proposed amendment¹ to the lists of Carcinogenic, Mutagenic and Toxic to Reproduction (CMR) substances in REACH Appendices 1-6. These are the lists of substances banned from being used or placed on the market as substances, constituents of other substances, or in mixtures, for the supply to the general public under REACH Annex XVII entries 28-30.

The proposed amendment includes new substances, deletions and replacements. A large number of the new substances are nickel compounds and coal or coal tar distillates and extracts.

The proposal is to align the entries in the Appendices with those in Regulation (EC) No 790/2009, which is the first adaptation to technical and scientific progress (ATP) to the Classification, Labelling and Packaging (CLP) Regulation 1272/2008. The first ATP to the CLP regulation came into force on 1 December 2010.

The delayed alignment was due to disagreement among member states on the derogation regarding boron compounds in detergents and that the notification of the proposal was not submitted to the World Trade Organisation (WTO) in time.

A new Appendix 11 has also been proposed to be added to the REACH text for the derogations for specific substances referred to in Annex XVII entries 28-30. Currently, one entry has been proposed for a fifteen month derogation from the restriction on some boron compounds and their

¹ See the regulation draft text in full (version 4, with further changes expected) at <http://ec.europa.eu/transparency/regcomitology/index.cfm?do=search.documentdetail&DefS8CGwILXbjnxWsxABdIYzhzcWh5INL7Y0tZp1A.JtsqRhlJX/HPJ4gwluGyS1X>



acids and salts in the use of detergents as regulated by the Detergents Regulation 648/2004.

The proposed amendment is expected to be adopted in the first half of 2012, and to enter into force three months and twenty days after the publication in the Official Journal of the European Union. ■

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