

REACH4Textiles

an initiative to support market surveillance
for textiles products

ECHA Enforcement Forum

10th November 2021



EURATEX



EU textile and clothing industry in numbers



EURATEX Members November 2021

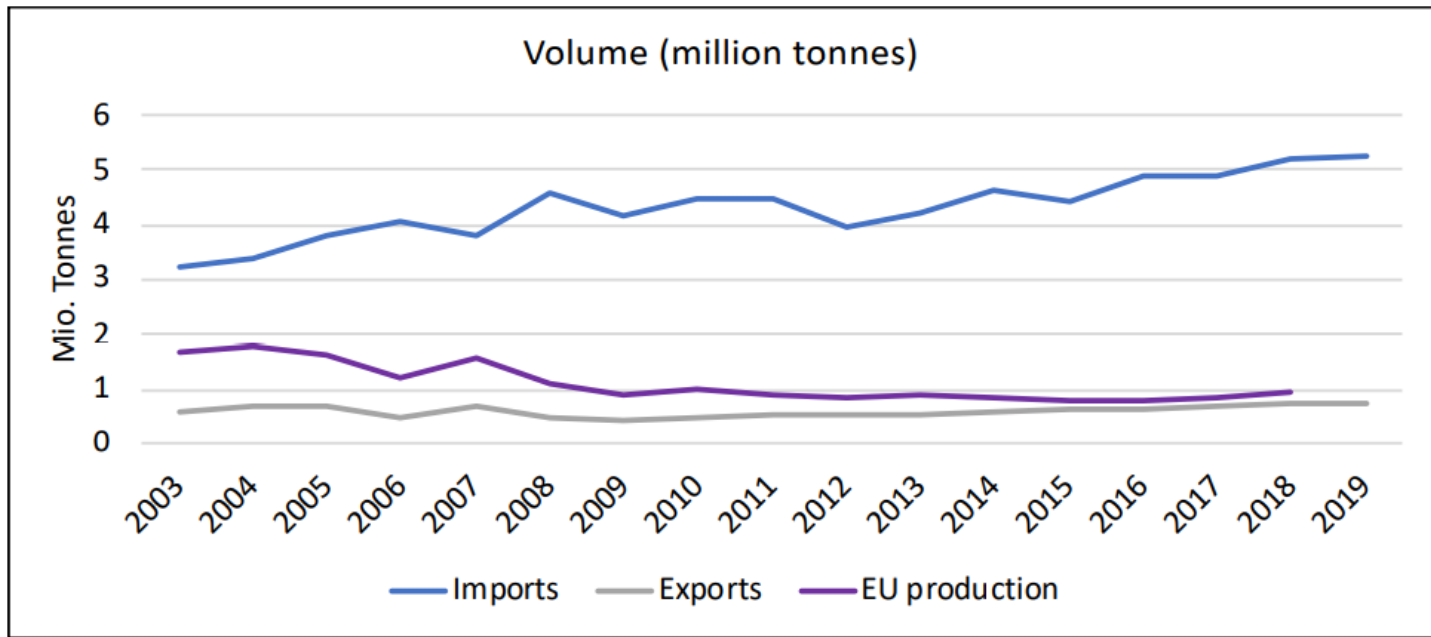
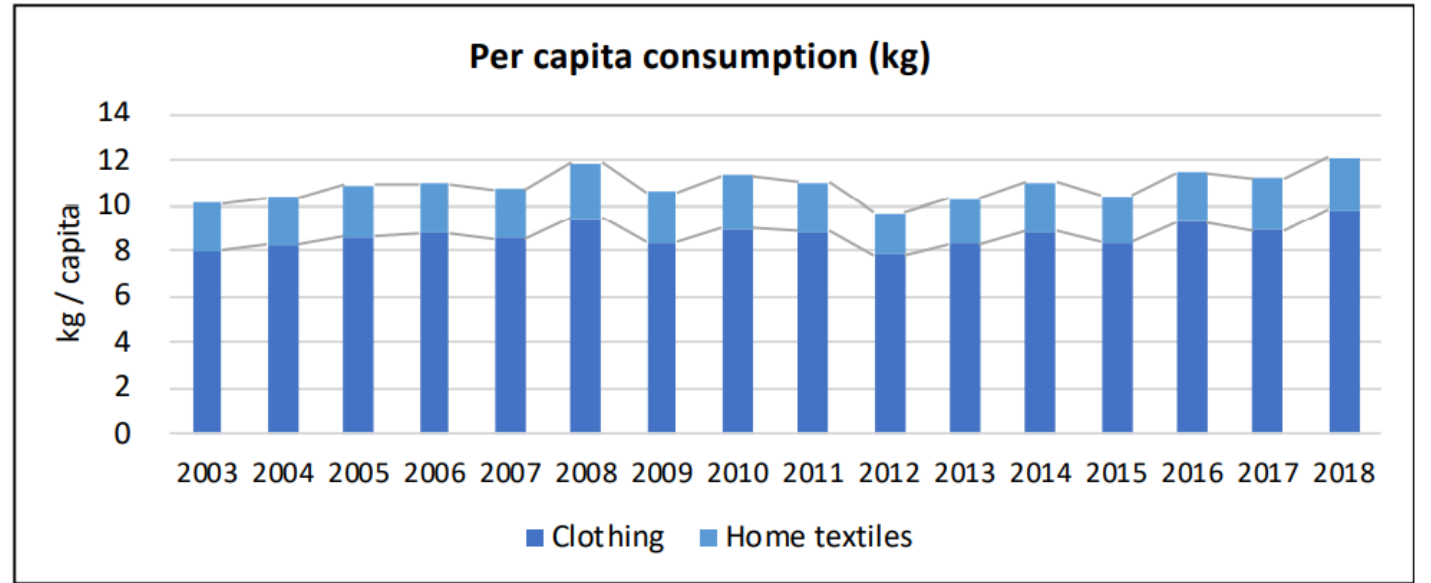


Partnership programme with companies **oerlikon** **SAURER.** **KARL MAYER**

Apparel in Europe

In 15 years:

- More people (+10 Mln. EU citizens)
- A bit more consumption (+1% or +20%)
- Import **almost doubled**
23.000.000.000 clothing imported extra-EU
- EU production **almost halved**
5.000.000.000 clothing made in EU



Source: EURATEX calculation 2018 (left)

Source: JRC report: Circular economy perspectives in the EU Textile sector, June 2021

More industry self-checks

“Hundreds” of RSL & MRSL lists

Certification systems

Initiatives, research

Europe	Total 2017	Total 2018	% change	Total 2019 (Status: 21.10.2019)
Total	5'299	5'840	+10%	4'409
Global	Total 2017	Total 2018	% change	Total 2019 (Status: 21.10.2019)
Total	17'386	19'348	+11%	19'309



Ø ZDHC

The ZDHC Programme is a collaboration of:
30 signatory brands,
102 value chain affiliates
18 associates

all active in the textile, apparel, leather and footwear industry.



		Δ 2019/2017
October 2019		
Brands as partners globally	74	12%
Chemical suppliers	185	40%
Manufacturers globally	353	28%
End of 2017		
Brands as partners globally	66	
Chemical suppliers	132	
Manufacturers globally	325	

Chemical regulation textiles-focused – today



REACH Annex XVII

- Chromium VI in leather (entry 47)
 - PAH's in rubber & plastics (entry 50)
 - Cd in plastics, coated materials (entry 23)
 - Flame retardants in textiles (entry 4, 7 & 8)
 - Azocolourants and azo dyes (entry 43)
 - **NPEO in washable textiles (entry 46, as of February 2021)**
 - **CMRs (33 substances) in textile consumer goods applicable as of 1st November 2020**
-
- **PFOA**, except textiles for workers protection (entry 68 as of **July 2020**) → POP



Chemical regulation textiles-focused – soon



ANNEX XV RESTRICTION REPORT

PROPOSAL FOR A RESTRICTION

SUBSTANCE NAMES:

Undecafluorohexanoic acid (PFHxA), its salts and related substances

CONTACT DETAILS OF THE DOSSIER SUBMITTER:

BAuA
Federal Institute for Occupational Safety and Health
Division 5 - Federal Office for Chemicals
Friedrich-Henkel-Weg 1-25
D-14195 Berlin, Germany

Restriction proposed for skin sensitisers in textiles and leather articles



ANNEX XV RESTRICTION REPORT

PROPOSAL FOR A RESTRICTION

SUBSTANCE NAME(S): skin sensitising substances

IUPAC NAME(S): n/a

EC NUMBER(S): n/a

CAS NUMBER(S): n/a

CONTACT DETAILS OF THE DOSSIER SUBMITTER:

Swedish Chemicals Agency (KemI)
PO Box 2, SE-172 13 Sundbyberg, Sweden

French Agency for food, occupational and environmental health and safety (ANSES)
14 rue Pierre et Marie Curie, 94701 Maisons-Alfort cedex, France

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Can we test?

will result in difficulties for enforcement. The many substances covered by the restriction proposal will make it impossible for authorities to check on all of them. A reduction of the scope or a master list of the most important ones would help to achieve the goal of the proposal. SEAC notes such master list is available in the Background Document (the IN-list in Table 19 in Annex E).

SEAC considers that from an enforcement and practicality perspective it is important that the Dossier Submitter aimed to seek consistency between the proposed restriction and the existing entry 72 on 33 CMR substances in clothing and related accessories, footwear and

More Substances per restriction



REACH Annex XVII

1	Chromium VI in leather (entry 47)	2014
33	CMRs in textile consumer goods	2020
100 or 1000 ?	Skin sensitizers in textiles	2021
5000 (?)	PFAS	2022?
?	group restriction/ Reach revision	2022+

Key points so far..

More garments and textiles in the EU (80% Imported)

More Industry self-regulation

More EU restrictions

More substances per restriction (beyond feasible checks)

A few checks..

Solutions

EU Policy, actions

Market Surveillance Regulation (EU) 2019/1020

(July 2021)

Union Product Compliance Network
Administrative Cooperation Groups (ADCOs)
Information and communication system



Chemical Strategy for Sustainability

mobilise existing instruments and develop new tools to step up enforcement



Industrial Strategy

e.g. Strengthen Single Market surveillance of EU and imported products (Q4 2022)



ECHA Forum and MS work

More REF projects



Enforcement, a priority for EURATEX

- Same rules for all
(level playing field for EU-made and imported products)
- Only enforceable restrictions in REACH

A political priority & now a project:
REACH4textiles



EURATEX @euratex_eu · 19h

Wrapping up the debate of 9 workshops on critical issues. Thanks to all our speakers, moderators and participants for sharing their knowledge, thoughts and questions.

[#conventionantwerp](#)



REACH4textiles



REACH4Textiles: Better market surveillance for textile products

Brussels, 15 September 2021 – The REACH4textiles project just kicked off. Funded by the European Commission, it aims at exploring solutions for fair and effective market surveillance on textile products. Every year, about 28 billions of garments circulate across Europe, 80% of which are imported from outside the EU and its jurisdiction. Inevitably, such huge...

[Read more »](#)

REACH4textiles

Three objectives:

- 1) Keep non-compliant products away from the single market
- 2) Increase Skills and knowledge
- 3) support an ADCO Network for chemicals in textiles and applying the EU “Market Surveillance” regulation 2019/1020

Project supported by the European Commission
DG Grow, D3 Market Surveillance Unit



REACH4textiles in short

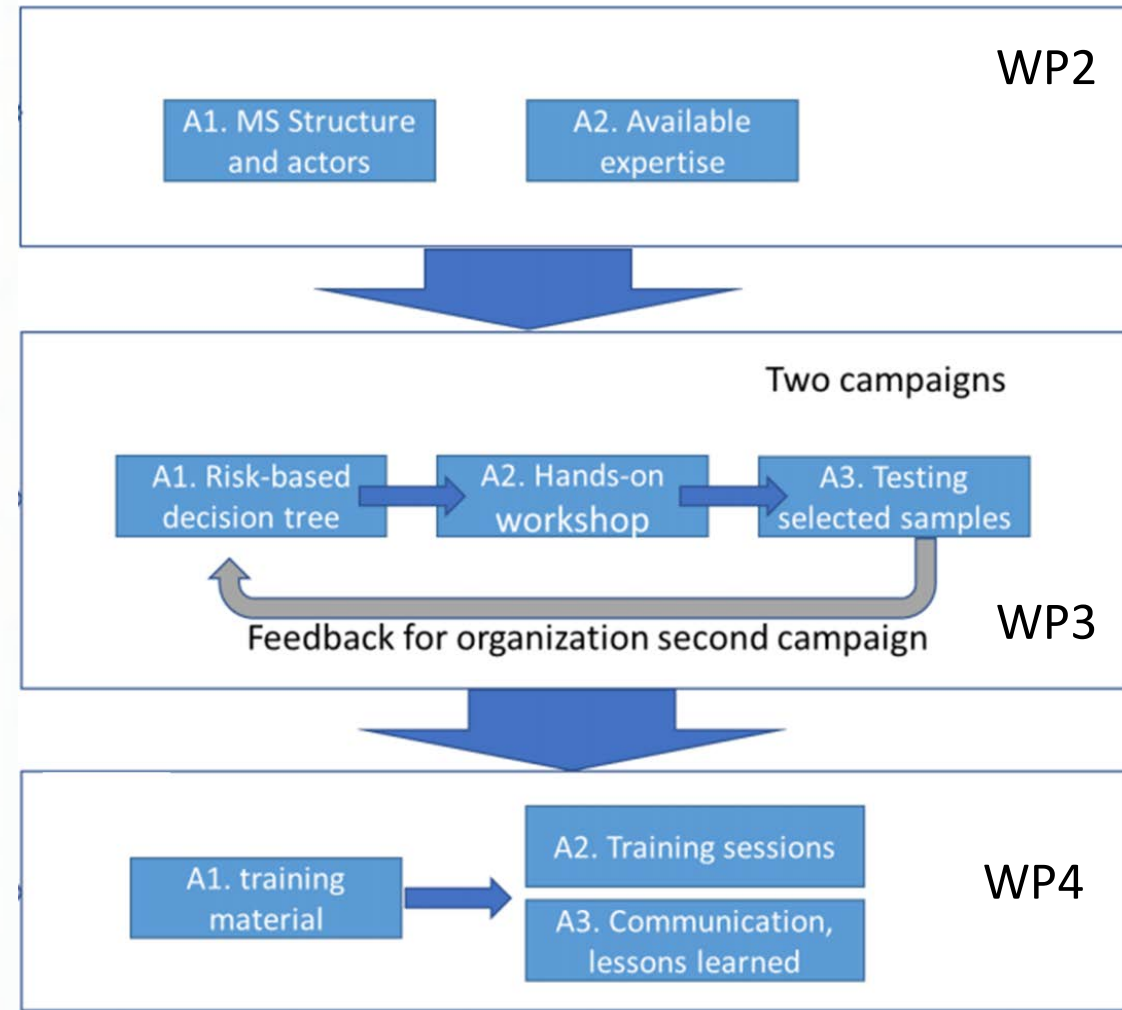


Take a picture

Can it be done better?
Methods for risk-based sampling

An advisory group with market surveillance authorities

Workshops in 2022
(Brussels, Berlin, Milan, more)



Ultimately: an **ADCO Network for chemicals in textile**

Approach to WP2

Task A1. Insight in the structure and actors of mark. surv.

- Task is to **identify all the relevant authorities** across EU
- Identify gaps and overlaps in the authorities' range of actions and identify which those address REACH compliance for textiles
- The resulting list will identify authorities to be invited in the workshops and training activities of the other WPs

WP2 task A.1 - Research Plan

- Result: Document, in which **all the relevant market surveillance authorities** across EU are identified (the EEA + Switzerland ,Turkey)
- Result by March 2022, early result expected by end of November
- **Possible sources:** List of national market surveillance authorities by country (Commission), OECD project on counterfeiting and piracy, DG TAXUD, BEUC (consumers' NGO), Project partners,...
- Method: Listing, Comparative study, completed with interviews

Eager to learn from REF 8, Customs 2, REF-7, and upcoming REF-10

- Comments, suggestions?

Responsible: Sanni Kotiranta, Policy Officer sanni.kotiranta@euratex.eu

Setting the REACH4Textiles Advisory Board (AB)

What is the need of AB?

to **advise & review deliverables on:**

- **Decision-tree** for risk-based approach to prioritize sampling (final by March 2023)
- **Training material** (final by April-August 2022) – (D 4.1 - M22: July 2023)
- **Best practices** - collection and validation (drafts by September 2022, final 2023)

What is the workload?

- Attending ad-hoc progress meetings (estimation 2 days per year)
- Reading documents (estimation 4-8 * 0.5 days per year)
- Total 4 - 6 working days year, based on availability

Who do we need on board?

- 10 market surveillance experts from national authorities
- Others

Conclusion

Humble industry approach to engage & support enforcement

**REACH4textiles offers an opportunity,
You are welcome to join the Advisory Board**

This presentation

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Director Sustainable Businesses

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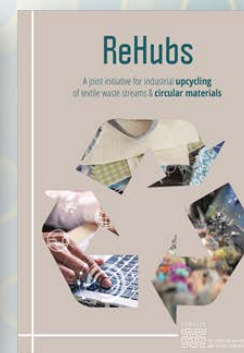
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