


# EURATEX

Level playing field for consumer safety in  
textile products

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ECHA Forum, 5 November 2019

## EUROPEAN INDUSTRY FACTS & FIGURES

 178 billion €

**TURNOVER**

 171,000

**COMPANIES**

 1,700,000

**EMPLOYEES**

 50 billion €

**EXTRA EU EXPORTS**

### Today:

1. Safety how ?
2. What are the Numbers ?
3. How to do better



Textile products safety  
main relevant **REACH** restriction

**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**)
- **PFOA**, except textiles for workers protection (entry 68 as of **July 2020**)
- Skin sensitizers (now 95 substances, tomorrow 1000???)

**Art 68.2**

- **CMRs** (286 → 33 substances) in textile consumer goods applicable as of **1<sup>st</sup> November 2020**



- **15 months**

- **9 months**

- **12 months**

Alert number: A12/1265/19  
 Category: Clothing, textiles and fashion items  
 Product: Underwear  
 Brand: Tchibo  
 Name: Pantys  
 Type / number of model: 14547 (373956-373962) (Pantys 3 Stück - 3 pairs of shorts) 14548 (373963-373966, 374460- 374462) (Pantys 7 Stück - 7 pairs of shorts) 14549 (373967-373970, 374463-374465) (Slips 3 Stück - 3 pairs of b  
 Batch number / Barcode: Unknown

**Risk type:** Chemical  
 The product contains an excessive amount of nickel (measured value: 130 mg/kg by weight).  
 Nickel is a strong sensitizer and can cause allergic reactions if present in articles that come into direct and prolonged contact with the skin.

The product does not comply with the REACH Regulation.

**Measures taken by economic operators:** Recall of the product from end users, Warning consumers of the risks, Withdrawal of the product from the market (By: Importer)

**Company recall page:** <https://www.tchibo.de>

**Description:** White and grey underwear. No packaging description available. The product was sold online.  
**Country of origin:** Sri Lanka  
**Alert submitted by:** Germany  
**Type of alert:** Serious  
 Products were found and measures were taken also in: Austria

August 2019

- Entry 27 on nickel restriction extended to textiles
- Do we have appropriate test methods ?

Alert number: A12/1265/19  
 Product: Underwear  
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 Batch number / Barcode: Unknown  
 Type of alert: Serious

**Category:** Clothing, textiles and fashion items  
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**Risk type:** Chemical  
 The product releases an excessive amount of nickel (calculated value: 87 µg/cm2/week).  
 Nickel is a strong sensitizer and causes allergic reactions if present in articles that come into direct and prolonged contact with the skin.

The product does not comply with the REACH Regulation.

**Measures taken by economic operators:** Recall of the product from end users, Warning consumers of the risks, Withdrawal of the product from the market (By: Importer)

**Description:** White and grey underwear. No packaging description available. The product was also sold online.  
**Country of origin:** Sri Lanka  
**Alert submitted by:** Germany  
 Products were found and measures were taken also in: Austria, Poland

October 2019

Textile products safety

## Voluntary industry measures

Info about IKEA + H&M testing  
campaign

### The «lists» RSL / MRSL

Responsible Brands / customers request compliance with:

Restricted Substances Lists (RSL)

Manufacturing Restricted Substance Lists (MRSL)

Use of chemicals and thresholds are firmly fixed and tested in products/productions.

*Proliferation of different « lists » = pressure & costs to manufacturers/ especially SMEs*

Textile products safety  
**Voluntary industry measures**

**Beyond «lists», growing adoption of large scale initiatives**



N° of released certificates

Tests results pending..

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



<b>October 2019</b>		<b>Δ 2019/2017</b>
Brands as partners globally	74	12%
Chemical suppliers	185	40%
Manufacturers globally	353	28%

<b>End of 2017</b>	
Brands as partners globally	66
Chemical suppliers	132
Manufacturers globally	325

# Textile products safety

## Voluntary industry measures




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.

Chemical Industry		Signatory Brands – Brands and Retailers		Textile and Footwear Industry	
	Archroma		adidas		Albini Group
	Dyckerhoff		ASOS		Arvind Limited
	Dyckerhoff		Coop		Asia Pacific Rayon
	Dyckerhoff		ESPRIMO		ATLAS EXPORTS
	Dyckerhoff		HUGO BOSS		BIRLA CELLULOSE
	Dyckerhoff		LBRAND		CIEL Textile
	Dyckerhoff		MARKS & SPENCER		Coats
	Dyckerhoff		NEW BALANCE		Covolán
	Dyckerhoff		PUMA		DENIM EXPERT LTD.
	Dyckerhoff		PVH		EASTMAN EXPORTS
	Dyckerhoff		RAYMOND UCO		GHCL LIMITED
	Dyckerhoff		SANTORI		ISKO
	Dyckerhoff		SATERI		KINGDOM
	Dyckerhoff		SCISKY		Lenzing
	Dyckerhoff		SALIRONE		MAS
	Dyckerhoff		SAURONG		NAHAR GROUP OF
	Dyckerhoff		SANTORI		PRIME ASIA
	Dyckerhoff		SANTORI		RATTI SPA
	Dyckerhoff		SANTORI		SATERI

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**Today:**

2. What are the Numbers?





# Moving articles across EUROPE



EU28 PRODUCTION SOLD			
Description	Unit	Quantity	
		2017	
Clothing	items	3,747,639,000	
	pairs	1,270,344,000	
Carpets	m2	881,136,000	
	m2	137,147,000	
Made-up textile articles	items	297,476,000	

**5 Bln. items**  
**(+ 10%)**

1 out of 5 of items traded in EU

# Moving articles across EUROPE



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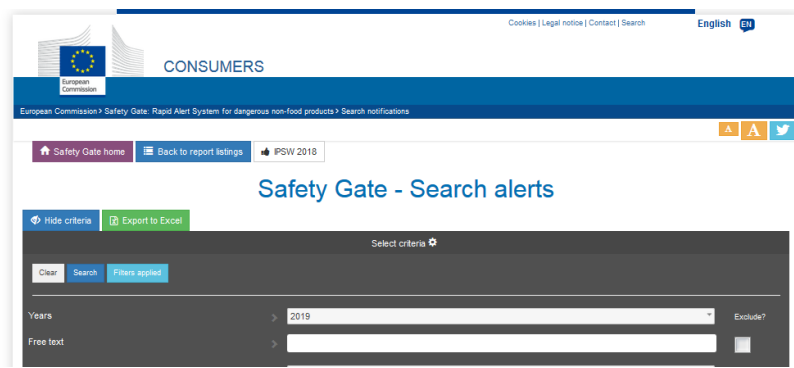
Products imported in the EU					
Description	Unit	% Change		2018	% Change
		2017	2017/2016		
<b>CLOTHING</b>	N° of items	16.368.479.287	1,2%	16.985.063.517	3,77
	N° of pairs	5.652.575.987	6,4%	5.878.350.698	3,99
	Tons	464.352		479.115	3,18
Carpets	Square meter	260.483.199		254.691.530	-2,22
	Square meter	488.967.350		480.660.810	-1,7
Home textiles	N° of items	185.353.915		178.495.257	-3,7
	Tons	742.129		751.059	1,2
	<b>n° of wearable items</b>	<b>22.021.055.274</b>		<b>22.863.414.215</b>	<b>3,8%</b>

**22,8 Bln. Items**  
**(+ 3,8%)**

**27,8 Bln. Items**

Data Source EUROSTAT, Procom nomenclature (production) codes 1392, 1393, 14  
Data Source EUROSTAT, CN nomenclature (trade)

# Identifying "free-riders" is very difficult



Insights:  
(Not statistically relevant)



24 non-complaint products for Chemical risks until October 2019

# Example 1

## Market Surveillance in Belgium

Contrôles proactifs  
 Proactieve controles

### Controleplan - Plan de contrôle

2019

Afdeling  
 Division

Onderwerp  
 Sujet

Afdeling Veiligheid  
 Division Sécurité

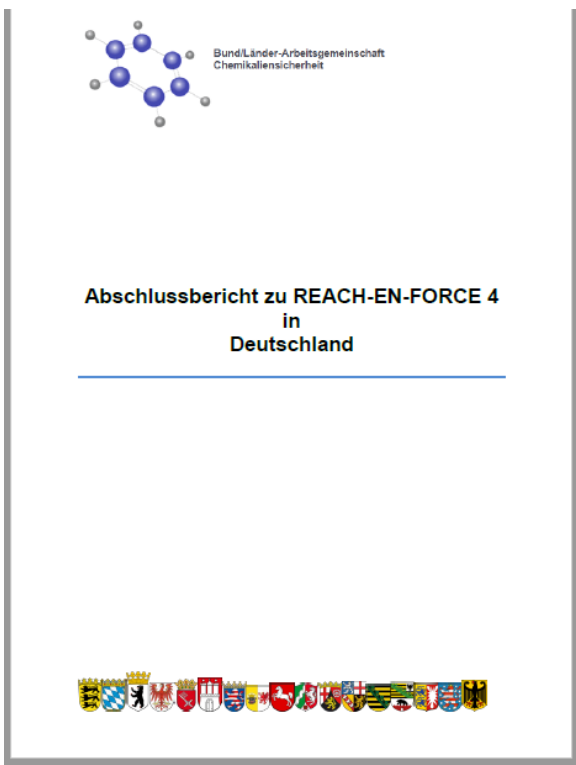


Inputs welcome by September 2019

CASP personal transporters	CASP personal transporters
e-bikes	e-bikes
CASP children's bicycle seats	CASP children's bicycle seats
CASP batteries (mobile devices)	CASP batteries (mobile devices)
CASP soft filled toys	CASP soft filled toys
liften - modernisatie	ascenseurs - modernisation
schietingen in groeven en graverijen (RECURRENT)	tires de mines et carrières (RECURRENT)
actieve ontspanningsevenementen (RECURRENT)	divertissements actifs (RECURRENT)
speelterrinen (RECURRENT)	aires de jeux (RECURRENT)
gastransport (RECURRENT)	transport de gaz (RECURRENT)
gasdistributie - werven (RECURRENT)	distribution de gaz - chantiers (RECURRENT)
gas - werken door derden (RECURRENT)	gaz - travaux par tiers (RECURRENT)
springstofopslagplaatsen (RECURRENT)	dépôts d'explosifs (RECURRENT)
extreme ontspanningsevenementen (RECURRENT)	divertissements extrêmes (RECURRENT)
kermistoestellen (RECURRENT)	attractions forains (RECURRENT)
attractieparken (RECURRENT)	parcs d'attractions (RECURRENT)
SEVESO (RECURRENT)	SEVESO (RECURRENT)
vuurwerk (bemonsteringen)	feux d'artifice (échantillonnages)
verkoop feestvuurwerk via internet (controle met honden)	vente d'artifices de joie par internet (contrôles avec chiens)
grote vuurwerkspektakels	grands spectacles pyrotechniques
CASP 2019 Slime Toys	CASP 2019 Slime Jouets
beschermende handschoenen (chemische gevaren)	gants de protection (risques chimiques)

## Example 2

### REACH EN FORCE 4 – 8 textiles checked



1751 products checked

Uncompliant rates:

11% average

23% internet sales

Anlage: Einzelergebnisse REF-4 in Deutschland

Eintrag	Beschreibung	Anzahl Überprüfungen	Anzahl Beanstandungen
5	Benzol in Klebstoffen für Verbraucher und gewerbliche Anwender	265	2
6	Asbestfasern in Erzeugnissen	178	26
23	Cadmium und seine Verbindungen in Kunststoffen/Verpackungen und sonstigen Erzeugnissen, Hartloten und Schmuckwaren	322	36
23	Hartlote	89	14
23	Kunststoffe/Verpackung	197	19
23	Schmuckerzeugnisse	17	3
23	Sonstiges	19	0
27	Nickel	208	21
27	Schmuckerzeugnisse	164	9
27	Metallteile an Kleidung (Nietknöpfe, Nieten, Reisverschlüsse)	15	2
27	Sonstiges	29	10
32	Chloroform in Klebstoffen für Verbraucher und gewerbliche Anwender	255	19
43	Azolarbstoffe in Textil- und Ledererzeugnissen	5	2
43	Ledererzeugnissen	2	1
43	Textilerzeugnissen	3	1
45	Diphenylether-Octabromderivat C <sub>12</sub> H <sub>2</sub> Br <sub>8</sub> O als Stoff, als Bestandteil anderer Stoffe, in Gemischen und in Erzeugnissen	3	0
47	Chrom (VI)	381	48
47	Zement	82	0
47	Ledererzeugnisse	299	48
48	Toluol	256	9
48	Klebstoffe	179	6
48	Farbsprühdosen	49	3

40%

33%

Source [www.blac.de](http://www.blac.de) May 2018

### Example 3

## Customs action in Croatia - "fakes" priority vs chemicals



Izvor: Pixsell / Autor: Borna Filic/PIXSELL

source <https://www.tportal.hr/>



40.265 "fake" general articles destroyed in 2018; value € 246.500

571 cases against suspicious packages,  
566 cases (99%): goods destroyed,

Toys and sports equipment 50,7 %,  
clothes 22,6% (+ - 124)  
shoes 12,6%

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3. How to do better



## ENSURE

### Level Playing field in REACH works

NEW Restriction on Skin Sensitizers, Annex XV report points out testing issue for industry and enforcement authorities alike

**« Higher burden and cost for testing of compliance could result in that less enforcement activities and controls in fact conducted »**

But are the costs correctly estimated ????

The image shows the cover page of an ECHA Annex XV Restriction Report. The page is white with a thin grey border. At the top left is the ECHA logo (European Chemicals Agency). The title is 'ANNEX XV RESTRICTION REPORT' followed by 'PROPOSAL FOR A RESTRICTION'. The substance name is 'skin sensitising substances'. Below that, it lists IUPAC, EC, and CAS numbers as 'n/a'. At the bottom, it provides contact details for the dossier submitter, including the Swedish Chemicals Agency (KemI) and the French Agency for food, occupational and environmental health and safety (ANSES).

**ECHA**  
EUROPEAN CHEMICALS AGENCY

**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



## Pilot project

### Actions on cross-cutting priorities

- **Control of imports & cooperation with customs**
  - Pilot project on cooperation with customs
    - Scope: Restrictions and CLP Labelling in imported goods in very close cooperation with customs
    - Timeline: 2018-2020. Now: inspections ongoing



Welcome but... can pilots impact at large scale?

## Info shared by the Industry in 2018

- Frequently found substances/  
products:
- Issues on test methods

**Useful?**

**What is needed ?**

### 1.2 Priority chemicals

Based on test results in accredited testing laboratories, there are evidences of the substances below are still found in articles mentioned in REACH restrictions. Substances of new entries, which are still not applicable, are also relevant and have already been found in articles.

#### 1.2.1 Compliance with REACH Annex XVII

- PAH's in rubber & plastics (entry 50)
- Cd in plastics, coated materials (entry 23)
- Ni in articles which come into direct contact with the skin (entry 27)
- AZO-dyes in textiles that make direct and prolonged skin contact (entry 43)
- Phthalates in plasticized materials of toys & childcare articles (entry 51 & 52)
- Dimethylfumarate in articles (entry 61)
  
- DecaBDE in articles (entry 6, applicable as of 02/03/2019)
- CMR substances in clothing, accessories & footwear (entry 72, applicable as of 01/11/2020)
- PFOA (entry 68, applicable as of 4/7/2020)
- NPEO in washable textiles (entry 46, applicable as of 03/02/2021)

#### 1.2.2 Product groups with higher risks

- Coloured textiles that make direct & prolonged skin contact
- Coated materials, for example synthetic leather
- Plastic parts and accessories, especially PVC
- Metal accessories

## Conclusions

More products & more restrictions, industry voluntary action increases, Member States resources?

Rapex & Pilots give insights only, what do we know?

Test methods are still an issue

Fruits of communication, role of products' test finally acknowledged

## Next steps

"Goods package" Regulation,

How can we help ?

**A cooperation platform with ECHA, market surveillance, customs, industry and others?**

# Thank you for your attention

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