



TÜV Rheinland LGA Products – Customer Information.

Proposal for restriction of skin sensitizing substances in
textile, leather, hide and fur articles.

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Precisely Right.

The European Chemicals Agency (ECHA) has published a report submitted by France and Sweden to restrict the use of skin sensitizing substances in articles made from textiles, leather, hide and fur. This report follows after announcing the intention for a restriction back in February 2018 and a call of evidence, which was running until September 2018.

The aim of this restriction is to protect the general public from a possible sensitization and subsequently from developing allergies and of course to protect those that have already developed allergies. Skin sensitization is a health effect, which leads to a lifelong sensitivity to a specific allergen.

WHAT IS THE ARTICLE SCOPE OF THE PROPOSED RESTRICTION?

The scope of articles is similar to those proposed in entry 72 of Annex XVII of Reach, with the difference of leather, hides and fur which are exempt there.

- Clothing or related accessories
- Textiles other clothing with human skin contact to an extent similar to clothing
- Footwear
- Leather, hides and fur

ARTICLES OUT OF SCOPE

The articles not covered by the restriction proposal are the following:

- Jewellery
- Glasses and sunglasses
- Curtains
- Textile lampshades and wall decorations
- Filling materials in chairs, armchairs and sofas
- Second-hand articles (see further explanation below)
- Articles within the scope of Regulation (EU) 2016/425 of the European Parliament and of the Council on personal protective equipment
- Articles within the scope of Regulation (EU) 2017/745 of the European Parliament and of the Council on medical devices
- Parts of footwear that do not come into contact with the human skin under normal or
- Reasonably foreseeable conditions of use, such as underside of footwear

NEXT REGULATORY STEPS

ECHA is now doing a conformity check on the report and a public consultation phase is expected to start in June 2019. Any interested party and stakeholder can comment on the proposal of the restriction. Based on previous legislative acts, it can be expected that the regulation will be published in 2023. The regulation will then enter into force after a planned transition period of 36 months.

The progress of the regulatory process can monitored here: <https://echa.europa.eu/de/registry-of-restriction-intentions/-/dislist/details/0b0236e182446136>

PROPOSED RESTRICTION

1. Shall not be placed on the market for the general public in any of the following articles made exclusively or partly of textile, leather, hides and furs:

- Clothing and related accessories
- Articles other than clothing which come into contact with the human skin under normal or reasonably foreseeable conditions of use to an extent similar to clothing
- Footwear

if, the article or any individual part of the article at point of sales, contains the substances in an individual concentration equal to or greater than the concentration specified in paragraphs 2 and 3.

The articles or parts of articles, as listed in paragraph 1, shall, at point of sale, not contain the following substances above concentrations specified below:

Proposal for restricted substances

SUBSTANCE	LIMIT	COMMENT
Disperse Dyes (see list of substances below)	Not detectable	Some sensitizing disperse dyes are regulated in Germany, Egypt and Korea and have been voluntarily regulated on RSLs for some years.
Chromium VI compounds	All materials: 1 mg/kg	Note that this would need a revision of the current limit value of < 3 mg/kg of Annex XVII Reach.
Formaldehyde	All materials: 75 mg/kg	This would extend the scope of the current regulation of Formaldehyde in Textiles from November 2020 onwards under the CMR regulation to include leather, fur and hides.
1,4 paraphenylene diamine	Textiles: 250 mg/kg Leather, hides and furs: 210 mg/kg	This substance is regulated in Switzerland for the production of dyes. It has been on the radar of NGOs due to its sensitizing properties for a while and can also be found on some RSLs. Our testing experience shows, that free 1,4 paraphenylene diamine is hardly found in analytical tests.
Nickel compounds	Textiles: 130 mg/kg Leather, hides and furs: 110 mg/kg	Nickel is not regulated in textiles, footwear, leathers and hides, apart from the release of metal accessories. It remains to be seen, if this limit value intends to cover the total content of Nickel by extraction or the content of Nickel following a migration.
Cobalt compounds	Textiles: 70 mg/kg Leather, hides and furs: 60 mg/kg	This restriction is similar to the above mentioned Nickel content. It is not clearly expressed, if a total content after extraction or migration shall be regulated.
Skin sensitizers Category 1, 1A or 1B listed in Annex VI to Regulation (EC) No 1272/2008 (harmonized)	Textiles: 130 mg/kg Leather, hides and furs: 110 mg/kg	This covers roughly 1000 individual substances right now. Not all of them are relevant to textiles, leathers, furs or hides, however this restriction would include some substances where a substitution is not always feasible, two examples are Glutaraldehyde (vegetable tanning) or diisocyanides (monomers for Polyurethane).

List of Restricted Dyes

SUBSTANCE	CAS NO.	EC NO.
CI Disperse Blue 3	2475-46-9	219-604-2
CI Disperse Blue 7	3179-90-6	221-666-0
CI Disperse Blue 26	100357-99-1 13324-23-7 3860-63-7 2580-56-5	600-078-1 603-725-6 223-373-3 219-943-6
CI Disperse Blue 35	12222-75-2 56524-77-7	602-260-6 260-243-5
CI Disperse Blue 102	12222-97-8	602-282-6
CI Disperse Blue 106	12223-01-7	602-282-2
CI Disperse Blue 124	61951-51-7	612-788-9
CI Disperse Brown 1	23355-64-8	245-604-7
CI Disperse Orange 1	2581-69-3	219-954-6
CI Disperse Orange 3	730-40-5	211-984-8
CI Disperse Orange 37/59/76	13301-61-6 12223-33-5 51811-42-8	236-325-1 602-312-8
CI Disperse Red 1	2872-52-8	220-704-3
CI Disperse Red 11	2872-48-2	220-703-8
CI Disperse Red 17	3179-89-3	221-665-5
CI Disperse Yellow 1	119-15-3	204-300-4
CI Disperse Yellow 9	6373-73-5	228-919-4
CI Disperse Yellow 39	12236-29-2	602-641-7
CI Disperse Yellow 49	12239-15-5 54824-37-2	235-473-4 611-202-9
CI Disperse Orange 149	85136-74-9	400-340-3
CI Disperse Blue 291		
CI Disperse Violet 1	128-95-0	204-922-6
CI Disperse Violet 93	122463-28-9	602-785-0
CI Disperse Yellow 64	10319-14-9	233-701-7
CI Disperse Yellow 23	6250-23-3	228-370-0

CONTACT PERSON

The experts at TÜV Rheinland have experience in the testing of textiles, apparel and shoes. We are your contact persons in test questions. Please do not hesitate to contact us if you have any questions.

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