



IUE 10 – Restricted Chemical Substances in Leather

2018 updated document

Introduction

Regulations to prevent the presence of some restricted chemical substances are valid in various countries. These regulations and the threshold limit values are not necessarily based on risk assessments but are precautionary measures. The presence of these restricted chemical substances in the leather can result from their inclusion in commercial chemical products used at various stages of the leather manufacturing processes. Restricted substances like pesticides can be from treatments during the animal stage.

1. Restricted chemical substances in leather

A regulation that has a major influence on limiting restricted chemical substances is the following:

EU REACH Regulation (REACH = Registration, Evaluation, Authorisation and restriction of CHemicals)

The EU REACH Regulation (EC) 1907/2006, is available in all EU languages. For example the English version is available as follows:

<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:136:0003:0280:en:PDF>

The original REACH Regulation from 2006 is being continuously updated. By the start of 2018 there were already 46 amendments to the original Regulation. To help keep an overview the following informative consolidated version was published in 2018:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1907-20180301&from=EN>

Also a list of the amendments was prepared in September 2018:

https://www.dguv.de/medien/ifa/en/fac/reach/liste_reach_verordnungen_en.pdf

The REACH Regulation is valid for all 27 EU countries; however, the impact of the REACH restrictions on chemical substances is very often global.

The REACH Regulation restrictions apply to the manufacture, use and marketing of restricted chemical substances and include threshold limits for the finished consumer article.

In the last years many countries have developed, or are in the process of developing, their own national regulations for restricting chemical substances. Examples of regulations that are often listed in customer specifications are:

- Proposition 65 (California/USA) <https://oehha.ca.gov/proposition-65/proposition-65-list>

2. Restricted chemical substances in the manufacture of leather

There are many lists of restricted substances prepared as specifications by manufacturers of apparel, shoes, upholstery and automotive vehicles. One widely used list of restricted chemical substances in chemical products used for manufacturing leather is the following:

MRSL of ZDHC

The **M**anufacturing **R**estricted **S**ubstances **L**ist (MRSL) prepared by the Zero Discharge of Hazardous Chemicals (ZDHC) programme provides threshold limits for restricted chemical substances in chemical products used in the manufacture of textiles and synthetic materials (Chapter 1) and manufacture of leather (Chapter 2). The MRSL considers the typical application amounts in processing, so typically the threshold limits for restricted chemical substances in the finished consumer articles, e.g. as in REACH, are much lower than the MRSL values.

Information on restricted substances can be downloaded from the ZDHC website:

<https://www.roadmaptozero.com/>

<https://www.roadmaptozero.com/news/post/zdhc-releases-electronic-version-of-zdhc-mrsl-to-drive-implementation-and-ease-usability/>

The latest version of the MRSL can be downloaded at:

https://www.roadmaptozero.com/mrsl_online/export_pdf.php

Other lists of restricted substances referred to in customer specifications are:

- VF Corporation (23 different brands including Timberland)

<https://s3.amazonaws.com/content.stockpr.com/vfcsustainability/files/pages/resources/policies-standards/VF+2019+RSL.PDF>

- American Apparel & Footwear Association (AAFA)

https://www.aafaglobal.org/AAFA/Solutions_Pages/Restricted_Substance_List

- Nike & Converse

<https://about.nike.com/pages/chemistry-restricted-substances-list>

- Adidas

https://www.adidas-group.com/media/filer_public/d4/9e/d49e5b50-a15a-4132-bf09-58cde10c284d/adidas_a-01_sept_1st_2018.pdf

- IKEA

https://www.ikea.com/ms/en_US/pdf/reports-downloads/product_safety/IKEA_Restricted_Substance_List.pdf