
eurofins
Softlines
& Leather
Changes in REACH:
Ensuring Footwear compliance in EU

Introduction

Ben DeVito Bennydevito@Eurofinsus.com
International Business Development Director USA
Based in Pennsylvania

Javier Trocoli Llorens JavierTrocoliLlorens@eurofins.com
Global Tech. Leader Softlines, Toys & Childcare
Based in Alicante, Spain

Our company | Business gross figures

Success factors

High standard of quality service

Flexibility & customized approach

Fast responsiveness

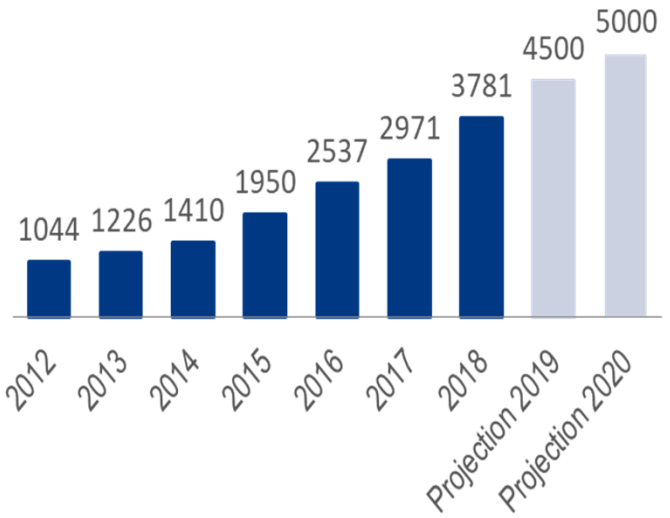
Group factors

45.000 employees

+800 laboratories

+47 countries

- Revenues in millions of EUR



eurofins | Softlines & Leather

Our company | S&L IBL

eurofins | Softlines & Leather

International Business Line

A global service provider of QA/QC services for the Textile & Leather industry with a worldwide network of High Volume Labs and strong US/European TCCs (Technical Competence Centers): Eurofins | BLC (UK), Alicante (Spain).

www.eurofins.com/tex

eurofins | Softlines & Leather

Footwear & REACH, What to know?

With a focus to articles

Annex XVII	SVHC	Annex XIV
Restrictions on manufacturing, placing on the market or use of certain substances and mixtures	**Substances of Very High Concern**	**Authorisation list of substances**
Substances and mixtures subject to restrictions and specific use	Substances together with Annex XIV that reach the criteria of being classified as CMR, Persistent, Bio-accumulative and Toxic o vPvB	Substances that, after a sunset date, should not be used
73 entries	205 substances	54 substances
Apply on substances, mixtures and articles	Applicable on substances, mixtures and articles	Not applicable on articles unless they contain a substance that will be liberated

Footwear & REACH, What to know?

Definitions

Substance

chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity

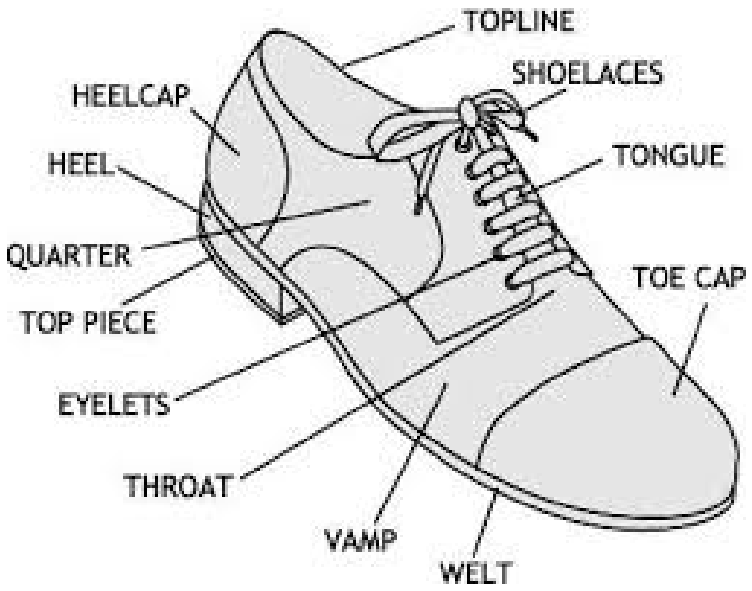
Mixture

mixture or solution composed of two or more substances

Article

object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition

Article in footwear



Options for REACH compliance

Supply Chain Management

Objective: identify the use of potentially hazardous/restricted substances

Pros:

- Allows to optimize the possible testing
- Supports for full material disclosure

Cons:

- Visibility of FULL supply chain is not always easy to get

Testing approach

Objective: identify the use of potentially hazardous/restricted substances

Pros:

- Complete detection and quantification of chemical hazardous substances in articles
- Detailed compliance verification

Cons:

- No visibility on supply chain

Options for REACH compliance

Full testing approach

To test all applicable substances to one article following the regulation´s text

Risk-based testing approach

To test only certain of the restricted substances assumed as being the risky ones based on:

- Materials and its risks
- Recalls
- Historic/trust with supplier

Example of risk-based testing matrix

Parameter	Test applycable by	Natural fibres	Blends	Synthetic fibres	Prints (dyes & pigments) (additionally to base	Rubber prints & synthetic leather (additionally	Leather (apparel, accessories , footwear,	Trimmings: Metal and metal coated items	Trimmings: Plastics	Trimmings: Coloured natural materials	Trimmings: Glass	Trimmings: Surface coatings (additionally to base
NPE	Material	1	1	1	1	1	1		1			1
Arylamines/Azodyes	Color	1	1	1	1	1	1		1	1		1
Azo Salts	Color	1	1	1	1	1	1					
Carcinogenic Dyes	Color	2	2	2	2	2	2					
Chlorobenzenes and Chlorotoluene	Color (mainly in PES or Wool)		2	2	2	2			2			
Chlorinated Parafins	Material					3	1		3			3
Dimethyl fumarate	Material	3	3	3	3	3	3					
Formaldehyde	Material and Color	1	1	2	1	2	1		2			
Hexavalent Chromium	Material	3	3				1					
Nickel Release	Material							1				
Total Cadmium	Material and Color				2	3		2	3		3	2
Total Lead	Material and Color				2	3		2	3		3	2
Extractable Cadmium	Material and Color	2	2	2	2	2						
Extractable Chromium VI	Material and Color	2	2	2	2	2						
Extractable Arsenic	Material and Color	2	2				2					
Extractable Lead	Material and Color	2	2	2	2	2						
Organotin Compounds	Material and Color	3	3	3	3	3	3					
pH	Material	1	1	1	1	1	1					
Phenols: PCP, TeCP, TriCP + OPP	Material	3	3	3	3	3	3			3		
Phthalates	Material					1	1		1			1
PAH	Material and Color (Carbon black)				1	1			1			1
Solvents (DMAC, DMF, NMP)	Material and color				1	1			1			
Benzene	Material and color											
Flame Retardants	Material	3	3	3	3	3						
PFOA/PFOS	Material (only if water/oil repellent finish	2	2	2								2
Quinoline	Material and color(impurity in PES and s	3	3	3								

Example considering only Annex XVII of REACH

REACH
ANNEX XVII
ENTRY 72

Annex XVII

Entry 72

33 CMR Substances

Textiles

In force from Nov 1st 2020

Annex XVII Entry 72

Scope:

a) Wearing apparel and related accessories

b) Textiles other than clothing which, under normal or reasonably foreseeable conditions of use come into contact with the human skin to an extent similar to clothing

c) Footwear

Annex XVII

Entry 72

33 CMR Substances

Textiles

In force from Nov 1st 2020

Annex XVII Entry 72

Not intended to be covered:

- Clothing, related accessories or footwear, or parts thereof, made exclusively of leather, fur or hide
- Accessories not related to clothing (jewellery, sunglassess)
- Curtains
- Wall-to Wall carpets and textile floor coverings
- Textile lampshades and Wall decorations
- Filling materials in upholstered furniture
- Non-textile fasteners

Annex XVII Entry 72

Summary of 33 CMR by group

- Heavy metals: Cd, Cr VI, As, Pb
- PAH´s: 8 substances
- COC´s: 3 substances
- Formaldehyde
- Phthalates: 5 substances
- Solvent residual: 4 substances
- Azo salts: 4 substances
- Carcinogenic dyes: 3 substances
- Quinoline


eurofins
Softlines
& Leather
Your industry, our focus