

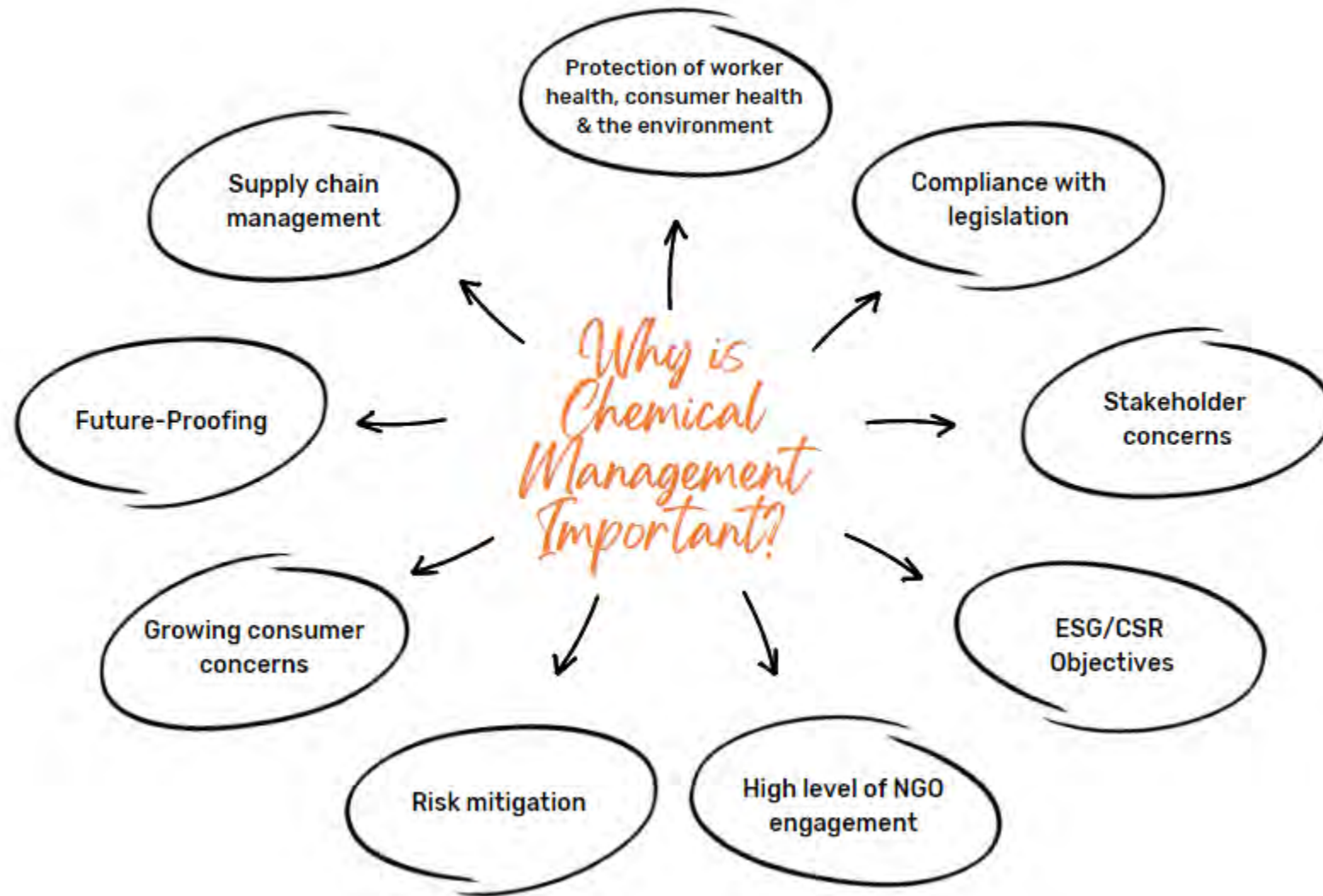


Chrome VI, ESG & Thinking Strategically about Chemical Management

FDRA Footwear Product Safety Conference

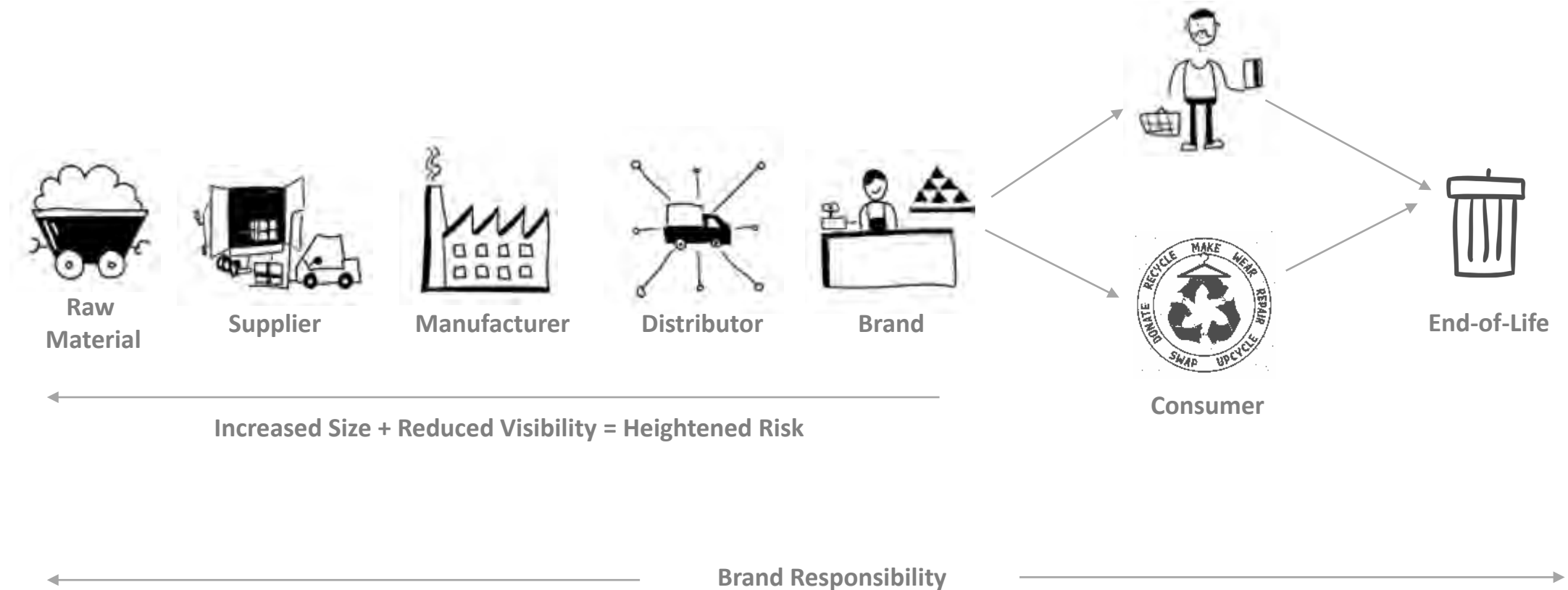
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Georgina Mawer, Eurofins | BLC





Chemical Management in and along the Supply Chain





....ABOUT CHEMICAL MANAGEMENT



Key Considerations for a Robust Chemical Management System

General Observations



- Is chemical management a board agenda item?
- How are decisions communicated?
- Association with industry groups such as ZDHC and LWG
- Access to legal counsel etc

Training



- Is there any internal training on chemical management?
- Is training provided to suppliers?
- Internal chemistry qualifications etc

Auditing



- Are chemical management audits conducted?
- Who carries out the audits (3rd party?)
- Future plans for audits etc

Material Procurement



- Process for procuring materials
- Selection of suitability of materials
- Is there an approved materials list
- Communication between sourcing teams and regulatory teams etc

Future Proofing



- Involvement with NGO's
- Plans for phase out chemicals
- Communication internally and decision making etc

MRSL Validation



- Communication of MRSL
- Chemical inventories
- Has any MRSL testing been conducted? etc

Supplier Management



- Process for supplier onboarding
- Selection of suitability of suppliers
- Direct sourcing Vs subcontractors
- Is there an approved supplier list
- Communication between suppliers and regulatory teams etc

Restricted Substances Policy



- Is there a policy on restricted chemicals? What is covered, how is this determined?
- How is the policy maintained, communicated and updated?
- How is compliance to the policy monitored?

Testing

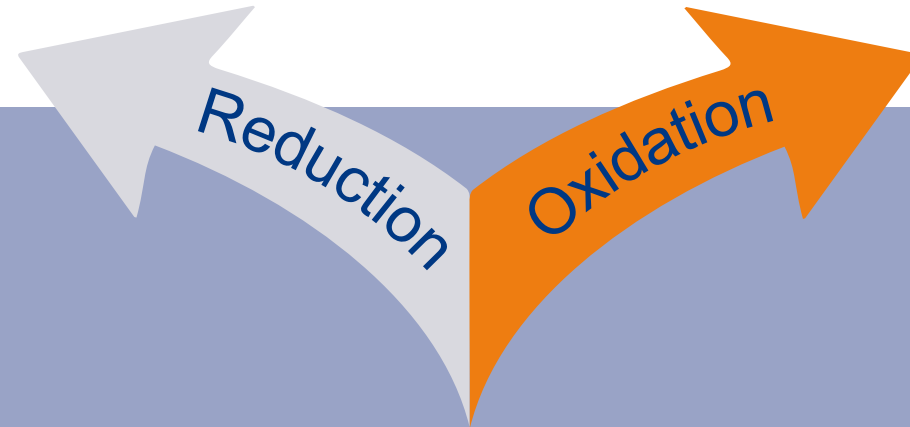


- Is there a testing plan in place? Is it consistent between different material types? What tests are covered?
- Is there a policy around failures and implementation of corrective actions?
- Are testing providers accredited? How are they selected etc



Chemical Focus: Chrome VI

**Chromium
III**



**Chromium
VI**

Minimising the risks

- Chemical Purchasing
 - Use reputable suppliers
 - Consider all Cr containing chemistries
 - Chemical purchasing policies
- Fat Content
 - Degreasing (<3% desirable)
 - Iodine content of fatliquors
- pH Levels
 - Processing water ideally <6.5
 - Avoid use of ammonium-based chemistries



- Free Chromium
 - Not all Cr is fixed
 - “Free” “Extractable” “Unfixed” “Soluble” “Leachable” “Migratable”
 - Can be measured
- Chemical Usage
 - Avoid oxidizing chemistries
 - Addition of propriety chemicals to reduce risk
- Post-Production
 - Transportation & Storage
 - Remediation



Annex XVII – REACH Regulations (3ppm)

Sensitisers Proposal (1ppm)



California Proposition 65 Notices





Thinking Strategically: Chrome VI Risk Profiling





Thinking Strategically: Chrome VI Risk Profiling





Closing Thoughts.....

The primary notion that underpins a CMS is that it should serve as a programme for progressive improvement. Through the understanding of a multitude of relevant 'risk factors,' your business will be able to gain a more comprehensive and reliable picture of its individual chemical risk. Through management and data analysis, these risks will be better understood and consequently more effectively minimised.





**THANK YOU FOR LISTENING
ANY QUESTIONS?**

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