

Hazard approach

In the discussion in the technical workshop was mentioned that art. 68 (2) only allows a hazard approach for the intended regulation. In our view the hazard approach is referring to the choice of the substances to be regulated. Those substances are on the list that have relevance in the textile supply chain and that are classified as hazardous CMRs 1a and 1b. For identifying the limits a feasible approach is necessary to allow authorities to enforce the regulation and to allow industry to proof compliance of their articles.

Different limits for formaldehyde for different kinds of textiles.

The commission is intending that all clothing articles are in the scope of the regulation. Contact with the skin is assumed to be always possible for these articles. Other textile articles where the contact with the skin is comparable to clothing are in the scope as well.

Even if for all mentioned articles it can be assumed that there is a contact with the skin the amount of the contact is different:

- Textiles like underwear, shirts, blouses etc. have a large part of their surface in direct contact with the skin.
- Textiles like jackets, coats, furnishing materials have no or only a little part of their surface in direct contact with the skin,

For most of the substances mentioned in the list a common limit is feasible for both kinds of textile articles. But this is not the case for the substance formaldehyde.

Formaldehyde as substance is not used in textile processing but the use of some formaldehyde releasing resins can cause a certain amount of formaldehyde on the fabric. For different kind of articles a different amount of these resins are necessary and could cause different formaldehyde residues on the fabric.

Therefore we propose different limits for

- textiles like underwear, shirts, blouses etc. that have a large part of their surface in direct contact with the skin: 75 ppm
- textiles like jackets, coats, furnishing materials that have only a little part of their surface in direct contact with the skin: 300 ppm

The different kind of textiles may be defined by examples in the Q&A documents.

These limits are well established in the textile supply chain, e.g. in the OekoTex standard 100 and in many Restricted Substances lists.

Most carcinogenic substances have no safe limit, but formaldehyde is an exception. Therefore a safe limit on textiles can be calculated on the basis of the exposure and the Derived No Effect Level.

For 75ppm formaldehyde in textiles with direct contact to the skin margins of safety for adults (shirt) and babies (romper suit) are quite comfortable. The margins of safety for 300ppm in textiles that have only a little part of their surface in direct contact to the skin are comparable because the affected surface of the body is much less. Therefore both limits are safe for the consumer.

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