

WORKSHOP

“Impact of REACH on Textiles and Clothing Suppliers in Mediterranean Partner Countries“

**Effective communication with suppliers
and consumers about REACH**

27 October 2008, Istanbul

Dr. Monika Kohla



**Textil und Bekleidung
Nordwest**

Who we are....



**Textil und Bekleidung
Nordwest**

Association of the textile
and clothing industry in
the north-western part of
Germany

- 300 member-companies
from all steps of textiles
supply chain
- 30.000 employees
- 6000 Million Euro
turnover



What we do....



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- u Environmental department: Supporting our companies in every issue of consumer and environmental protection:
 - arranging training courses for new acts (since 4 years for REACh)
 - taking part in national and European pilot projects (3 projects implementing REACh)
 - developing guidelines for the implementation
 - helping with sample-letters for different situations (REACh-letter for communication in the chain later in this presentation)

What are your obligations? I



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- u You need to communicate with your European customers concerning the SVHC candidates
- u It is important to know, which processing step, which additive might bring you in conflict with the SVHC candidates
- u To know more about the substances and their relevance for the textile industry gives you the opportunity to ask your suppliers, to avoid these substances and to communicate

What are your obligations? II



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- u First step: Learn more about the relevance of the SVHC- candidates for your production and your articles
- u Second step: communicate with your suppliers and your customers (and the consumers via your customers, mainly not directly)

What are your obligations? II



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- u **First step: Learn more about the relevance of the SVHC- candidates for your production and your articles**
- u Second step: communicate with your suppliers and your customers (and the consumers via your customers, mainly not directly)

15 SVHC Candidates, October 1



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u Anthracene	PBT
u 4,4'- Diaminodiphenylmethane	CMR
u Dibutyl phthalate (DBP)	CMR
u Cobalt dichloride	CMR
u Diarsenic pentaoxide	CMR
u Diarsenic trioxide	CMR
u Sodium dichromate, dihydrate	CMR
u 5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	vPvB
u Bis (2-ethyl(hexyl)phthalate) (DEHP)	CMR
u Hexabromocyclododecane (HBCDD)	PBT
u Alkanes, C10-13, chloro	PBT
u Bis(tributyltin)oxide	PBT
u Lead hydrogen arsenate	CMR
u Triethyl arsenate	CMR
u Benzyl butyl phthalate (BBP)	CMR

15 SVHC Candidates, October II



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**possibly relevant
for textile use: 7!**

- u **Dibutyl phthalate (DBP)**
- u **Bis (2-ethyl(hexyl)phthalate) (DEHP)**
- u **Benzyl butyl phthalate (BBP)**
- u Plasticizers for textiles made from/with PVC (up to 30 % in the plastic material):
 - Rubber boots and rainwear
 - PVC coated technical textiles
 - Shower curtains
 - Back coating of carpets for the bathroom
 - Prints on T-Shirts (but often PU, not PVC)

- u **Alkanes, C10-13, chloro** : short chain chlorinated paraffins :
 - Flame retardant
 - Additive for the leather treatment (renders smoothness to leather): leather clothing and belts
- u **Hexabromocyclododecane (HBCDD):**
 - Flame retardant for natural and synthetic fibres: used for theatre curtains, furniture, sunscreen, back coating of carpets

- u **Sodium dichromate, dihydrate**

- Additive for a special practice of wool dying to improve the fastness of the coloration; traces of chrome VI as residues in the textiles possible (normally don't exceed 0,1%!)

- u **Bis(tributyltin)oxide:**

- Biocide for textiles against fungal attack (outdoor)
- Biocide against bad smell after sweating (used in sportswear)
- traces in plastics: silicon, polyurethane, PVC (normally don't exceed 0,1%!)

Relevance in and outside EU?



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- u The 7 SVHC-candidates with possible relevance in the textile industry
 - were used in Europe in the past (5-10 years ago) and were mostly substituted step by step
 - some of them are already forbidden for textiles producing within Germany (not for imported textiles)
 - are still in use outside Europe (China), but no valid information from Mediterranean partner countries
- u So there might be a relevance in imported textiles into the EU!

It is a continuous process:



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- u Executive Director of ECHA Geert Dancet stressed that “these 15 candidates are only the first substances of very high concern identified through the formal process”.
- u The EU Member States and ECHA are preparing new proposals and the candidate list will thus be updated.
- u A new list with “current intentions” with 7 SVHC substances is already available - without textile relevance

What to do for you? III



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- u First step: Learn more about the relevance of the SVHC- candidates for your production and your articles
- u **Second step: communicate with your suppliers and your customers (and with the consumers via your customers, mainly not directly)**



- u The industrial and trade associations in Germany developed text modules for the communication; they were also presented to the associations in Brussels this month
- u The “Samples of phrasing and templates to fulfill the communication requirements according to article 33 REACH” are an option for you to use, no obligation – but many of your customers will do so! You may use any other writing, any other “wording”

Sample letter for communication I



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u Content:

- 1.1 Description of obligations
- 1.2 Ways of fulfilling the communication requirements
 - 1.2.1 Communication of information according to article 33(1) (along the supply chain)
 - 1.2.2 Communication of information according to article 33(2) (Consumer information)
- 1.3 Remarks and recommendations
- 1.4 Recommendations regarding product literature

- u According to article 33 information about the substances included on the candidate list has to be provided automatically. The following approaches can be taken:
 - Communication of information online;
 - Explicit and easily accessible information in the product literature;
 - Indication of a website in the product literature with up-to-date information (It is important that the website is established on a permanent basis and accessible at any time) – direct way of communication with the consumer

Sample letter for communication II



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u Important remark in 1.3:

- According to article 33, the obligation to provide information is only applicable, **if** a substance included on the candidate list **is present** in an article in a concentration above 0.1 % weight by weight. However, it can also be useful to indicate that an article **does not contain any substance** included on the candidate list („negative information“). This can help:
 - to pre-empt requests for information by recipients,
 - to avoid many queries,
 - because recipients and consumers of articles cannot be sure, if no statement has been made, that the information requirements according to article 33 have been sufficiently complied with. The samples provided therefore also include negative information.

My estimation: many companies in EU insist on this!

Sample letter for communication III



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u 2. Samples of phrases

- The following wording can be used to communicate information about substances included on the candidate list:

On request of recipients or consumers of articles:

Thank you very much for your request for compliance with Regulation (EC) No 1907/2006 (REACH). It is our intention to meet the requirements set by REACH, and we shall inform you in the framework of our business relations *[only in the case of recipients]* about the changes to our products resulting from REACH and agree on suitable measures on a case-by-case basis. As far as article 33 of REACH is concerned, we would like to communicate the following information:

Sample letter for communication IV



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- u Please use the model wording in the **table** relating to the **respective case and time**
- u **4 Timelines:**
 - **Stage 1:** The candidate list has not yet been published
 - **Stage 2:** The first candidate list was published on dd.mm.yyyy, full knowledge about all substances included on the candidate list is not available yet
 - **Stage 3:** The first candidate list was published on dd.mm.yyyy, full knowledge about the substances included on the list is available
 - **Stage 4:** A revised candidate list was published on dd.mm.yyyy.

Sample letter for communication V



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- u 3 cases to be distinguished:
 - the article is supplied without packaging materials
 - packaging materials are supplied (PVC film!)
 - the article is supplied with packaging
- u In principle 2 options for each case:
 - legally obliging conformation, that there is no SVHC candidate (more than 0.1%) present in the article/the packaging used
 - providing an information about a substance of the candidate list in the article/the packaging (over 0,1%)

Sample letter for communication VI



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u Example 1:

- The article and its packaging materials contain (optional: our articles contain) no substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <http://echa.europa.eu/>) in a concentration above 0.1 % weight by weight.

Remark: this is, what we expect for clothing!

Sample letter for communication VII



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u Example 2:

- The packaging materials contain (or: the article contains) the following substances included on the candidate list (date ...) in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), ...

Remark: for clothing this information would cause an inquiry, probably not for technical textiles!

Last comments I



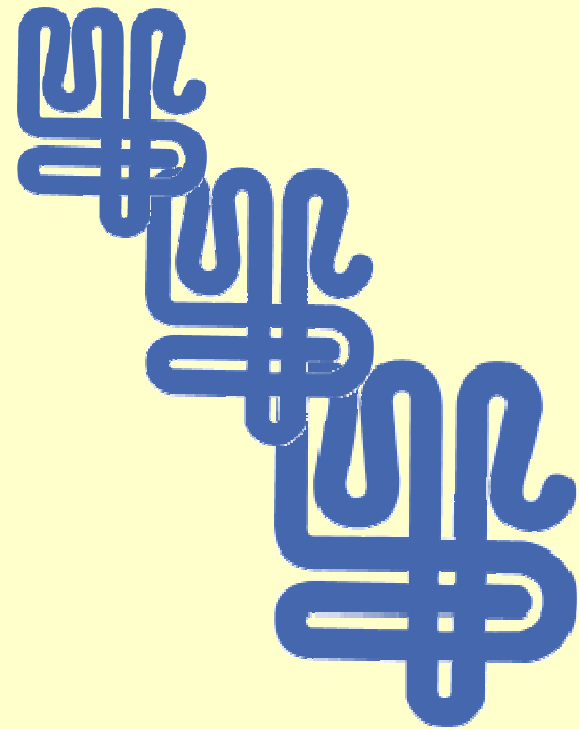
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- u The “Samples of phrasing and templates” are a first approach to fulfil the requirements of article 33 REACH
- u A confirmation is compulsory for delivery of articles into the EU, but you may use them also for your suppliers of articles (fibres, yarn, fabrics)
- u Link: http://reach.bdi.info/REACH-Hilfestellungen/Art_33_REACH_Samnples_and_templates_7_Oct_08.doc (also file on CDRom and memory stick)
- u You need additional confirmations from your suppliers of chemicals; use your new knowledge about critical processes



- u The numbers of analysis and inquiries will increase
 - by local authorities within the EU
 - by companies itself (mainly trading concerns)
- u Some companies extend their asked conformation to all cmr-substances or their own RSL (**R**estricted **S**ubstances **L**ist), especially for clothing
- u Please note that all members of the chain need a legally obliging confirmation!!

Thank you for your attention



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