



bluesign®

The
independent
industry
textile
standard

REACH

Wording

REACH

Registration, Evaluation, Authorisation and Restriction of
Chemicals

Regulation EC No 1907/2006

ECHA

European Chemicals Agency



REACH-Info
January 2009
Page 2

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REACH

Parties involved

- Manufacturer, importer of a substance (also substance in preparation) [Dystar, Huntsman, CHT.....]
- Downstream user (textile finisher in Europe) and producer of textile auxiliaries which uses chemicals from an other manufacturer
- Producer or importer of articles



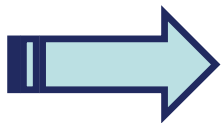
REACH

Article 5

- No data, no market

bluesign® standard

- No data, no business



same philosophy



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Definition article

Article: means an 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

Examples: trousers, outdoor jacket, shirt, car

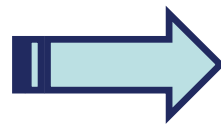


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Producer or importer of articles

- Article 7, (1.)
- Any producer or importer of articles shall submit a registration to the Agency for any substance contained in those articles, if both the following conditions are met:
 - (a) the substance is present in those articles in quantities totalling over 1 tonne per producer or importer per year;
 - (b) the substance is intended to be released under normal or reasonably foreseeable conditions of use.

Textile: perfumed articles, Aloe vera articles



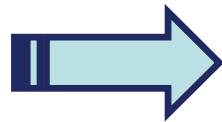
uncommon, action not to be expected



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Producer or importer of articles (SVHC)

- Article 7, (2.)
- Any producer or importer of articles shall notify the agency, in accordance with paragraph 4 of this article, if a substance meets the criteria in article 57 and is identified in accordance with article 59 (1), if both the following conditions are met:
 - a) the substance is present in those articles in quantities totalling over 1 tonne per producer or importer per year
 - b) the substance is present in those articles above a concentration of 0,1 % weight by weight (w/w)
- This paragraph shall not apply to substances that have already been registered for that use (6.).



action not to be expected for "normal" textiles;
see also page 15 ff of presentation



Substances of Very High Concern

- CMR Class I and II (carcinogenic, mutagenic or reprotoxic)
- pbt (persistent, bioaccumulative and toxic)
- vpvb (very pesistent and very bioaccumulative)

(Definitions see article 57)

SVHC list is regularly updated!

see: ECHA homepage

http://echa.europa.eu/chem_data/candidate_list_en.asp



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Identification of SVHC in articles (1)

- Testing?
Which article from which producer for which parameters, how often...?
Costs?
- RSLs; special SVHC requests?
Can you trust?
- Extended SVHC lists (to be expected)
How to manage based on tests or RSLs?



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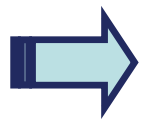
Identification of SVHC in articles (2)

What prescribes EU (ECHA)

ECHA Guidance Document

http://guidance.echa.europa.eu/docs/guidance_document/articles_en.pdf

- Exhaust options for obtaining information via the supply chain for suspected SVHC.
- Only as a last resort, conduct targeted analysis to identify whether or not suspected SVHC are present



bluesign® standard as an intelligent, systematic supply chain management for EHS aspects follows REACH principle to identify SVHC

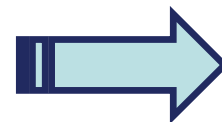


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SVHC, article 33

1. Any supplier of an article containing a substance meeting the criteria in article 57 and identified in accordance with article 59 (1.) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.
2. On request by a consumer any supplier of an article containing a substance meeting the criteria in article 57 and identified in accordance with article 59 (1.) in a concentration above 0,1 % weight by weight (w/w) shall provide the consumer with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.

The relevant information shall be provided, free of charge, within 45 days of receipt of the request.



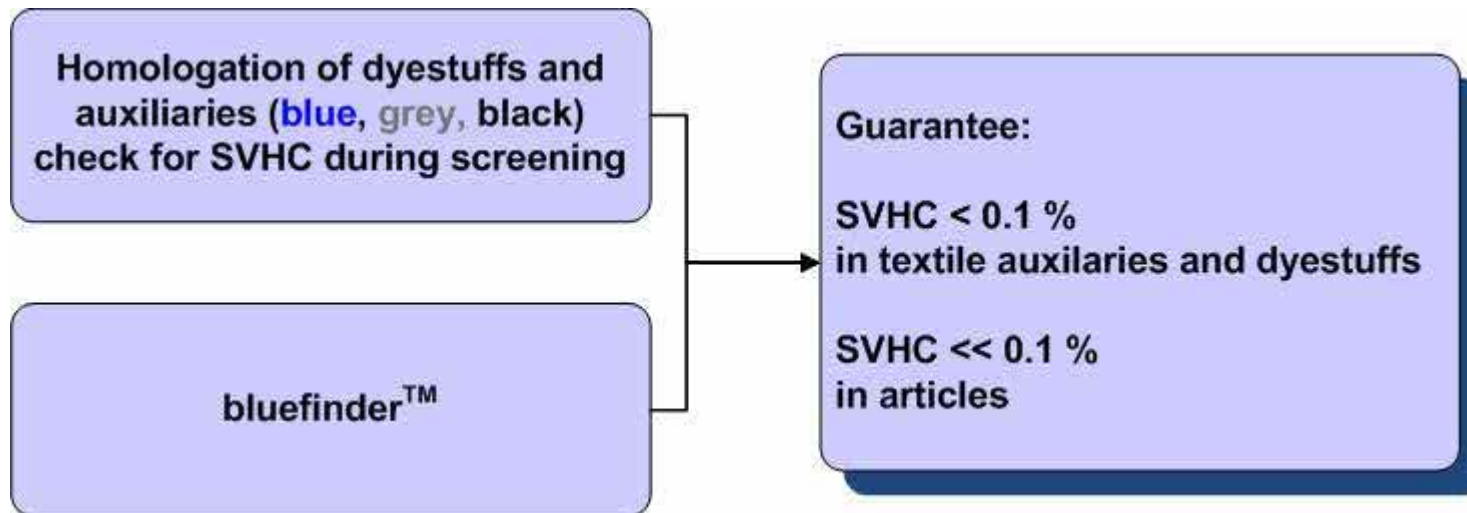
action necessary



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SVHC - bluesign® standard

How bluesign® standard can help?



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Current SVHC-list (1)

Substance name	EU (CAS No)
Triethyl arsenate	427-700-2
Anthracene	204-371-1
4,4'-Diaminodiphenylmethane (MDA)	202-974-4
Dibutyl phthalate (DBP)	201-557-4
Cobalt dichloride	231-589-4
Diarsenic pentaoxide	215-116-9
Diarsenic trioxide	215-481-4
Sodium dichromate	234-190-3 (7789-12-0 and 10588-01-9)
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	201-329-4
Bis (2-ethylhexyl)phthalate (DEHP)	204-211-0



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Current SVHC-list (2)

Substance name	EC (CAS No.)
Hexabromocyclododecane (HBCDD) and major diastereoisomers identified:	247-148-4 and 221-695-9
- Alpha-hexabromocyclododecane	(134237-50-6)
- Beta-hexabromocyclododecane	(134237-51-7)
- Gamma-hexabromocyclododecane	(134237-52-8)
Alkanes, C10-13, chloro (Short chain chlorinated paraffins)	287-476-5
Bis(tributyltin)oxide (TBTO)	200-268-0
Lead hydrogen arsenate	232-064-2
Benyl butyl phthalate (BBP)	201-622-7



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Action if article contains SVHC above 0.1 % (1)

It could be the case, that some special SVHC on current (PVC, phthalates!) or an updated SVHC list can not be avoided.

What would be the consequences?



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Action if article contains SVHC above 0.1 % (2)

SVHC are NOT banned by REACH!

SVHC could yet or in future be banned or restricted by other regulations

(see for examples the phthalates which are restricted to 0.1 % under EU regulation 76/749 (toys and childcare articles))

ACTIONS:

- Identify SVHC and SVHC concentration
- Phase out articles if SVHC is above 0.1 %
- If SVHC can not be avoided or substituted by alternatives, the following actions have to start



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Action if article contains SVHC above 0.1 % (3)

Information:

From the date of inclusion of the substance in the SVHC list

EU or EEA suppliers of articles which contain substances on the Candidate List in a concentration above 0.1% (w/w) have to provide sufficient information, available to them, to their customers or upon requests, to a consumer within 45 days of the receipt of the request. This information must ensure safe use of the article and as minimum contain the name of the substance.

bluesign technologies ag can help to work out such an information document!



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Action if article contains SVHC above 0.1 % (4)

Notification:

From 2011:

EU and EEA producers or importers of articles have to notify ECHA if their article contains a substance on the Candidate List. This obligation applies if the substance is present above 0.1% (w/w) and its quantities in the produced/imported articles are above 1 tonne in total per year per company.

- o For substances included in the Candidate List before 1 December 2010, the notifications have to be submitted not later than 1 June 2011.
- o For substances included in the Candidate List on or after 1 December 2010, the notifications have to be submitted no later than 6 months after the inclusion.



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Action if article contains SVHC above 0.1 % (5)

Note:

A notification is not required when

- The producer or importer of an article can exclude exposure of humans and the environment during the use and disposal of the article. In such cases, the producer or importer shall however supply appropriate instructions to the recipient of the article.
- The substance has already been registered for that use up the same supply chain or any other supply chain.

It can be assumed, that notification in 2011 is not necessary in most of the cases because substances are registered.

Obligation to inform is in most of the cases the only thing to do, if a SVHC-concentration above 0.1 % can not be avoided



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Support by bluesign® standard and bluesign technologies ag (1)

- The bluesign® standard follows REACH philosophy
- The bluesign® standard follows REACH principles to identify SVHC
- Optimal solution for bluesign® approved fabric
 - standard letter for declaration of REACH conformity
- bluesign technologies ag can help to work out SVHC information document (if SVHC > 0.1 % can not be avoided by BAT and EHS-risk is manageable!)



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Support by bluesign® standard and bluesign technologies ag (2)

- bluesign® standard gives deep knowledge on chemical inputstreams; all questions around chemical use in companies which follow the bluesign® standard can be managed
- bluesign® standard is an excellent tool to identify existence or non-existence and concentration ranges of SVHC
- Support for system partners on various REACH questions by bluesign technologies ag

