

Restricting CMRs in textiles

Final draft still lacks clarity on scope and testing methods

amfori calls once more for a clarification of the scope of the restriction on CMR in textiles coming in direct contact with the skin to facilitate compliance for European brands, retailers and importers

Background

As the restriction on CMR substances present in textiles coming in direct contact with the skin moves forward, the scope of the restriction remains unclear. While amfori members are committed to bringing only safe products on the EU market, amfori reiterates its call for clarity and certainty for global supply chain to adapt and comply. This contribution comes as an addition to the joint-position paper of several associations on the proposed restriction.

Overall, the restriction process has shown that many substances are already widely restricted by the industry, with some substances of the original list not being used at all in textile manufacturing. amfori welcomes the approach of the European Commission of consulting industry and restricting those substances which are the most problematic from a consumer safety perspective. It is vital that the Commission also takes other regulations into account, to prevent confusion and overlap in the implementation of the regulation.



Clarity on scope is needed

Textiles are used in a variety of sectors, and this restriction could apply to different types of articles. Bringing clarity

through a positive list of articles covered by the restriction could help economic operators, but also their suppliers overseas. This list should be exhaustive and not leave room for interpretation, this will make communication in supply chains easier and increase compliance.

While we welcome the derogation for second-hand textile products, we regret the fact that some non-textile articles such as shoes are included in the scope of the restriction, notably for some parts which are not in direct contact with the skin. We suggest removing shoes from the scope and limit it to textile products only, this would make the restriction scope clearer.

Provide testing methods

Setting a threshold limit for a substance in textiles can only make sense if provided with a commonly agreed testing method. amfori members urge the European Commission to provide internationally recognized testing and sampling methods for the substances covered by the restriction such as ISO and EN standard test methods.

Furthermore, as most textile products are produced in Asia, it is important to consider threshold limits which are detectable by the laboratories in producing countries. This will allow European brands, retailers and importers to test their products before import and increase compliance with the restriction, and overall provide safe products to European consumers.

Some substances in the current proposal have threshold limits of 1mg/kg, which would be often difficult to detect by many testing facilities in producing countries. This could lead to non-compliance despite strict measures taken by brands or importers.

Future restrictions on consumer goods

This restriction, using article 68(2) of REACH has been presented as a test-case before presenting further restrictions on other types of consumer goods. Many substances are already restricted by industry driven initiatives which are well recognized. It is important to focus only on those products and substances which pose a real risk to consumers.

Any new restriction should consider the reality of supply-chains, and their challenges. Global manufacturers are already successfully restricting substances, and this requires planning, time, and significant work on design ~~and~~ with suppliers.

As brands are striving to make their products more recyclable, we would welcome any further restriction to consider impact on recycling. This issue has been raised in the framework of the restriction of CMRs in textiles and will come again as a major issue in the future.

Finally, and most importantly, amfori members call for an evaluation of the process to be made before restricting substances in other consumer goods.

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