

Quality Assurance along the textile chain - Part 4

Hazardous substances in fabrics – and now?

The use of chemical substances for textile products is regulated by various laws such as the Reach Regulation, Consumer Goods Ordinance or Biocides Regulation, but also indirectly by the provisions of the Textile Labeling Act. In the textile industry, these requirements are currently leading to necessary, far-reaching changes in business processes, most of all where assuring the material compliance of products is concerned.

Textiles can contain a great variety of chemical substances. These are used as colorants, expedients and finishes to produce defined, colour-fast shades, or also to ensure dimensional stability. The use of these substances is consistently regulated for the entire EU by the Reach Regulation as well as various legislations on a national level such as the Consumer Goods Ordinance or Germany's Federal Order Prohibiting Certain Chemicals. For textiles, the latter codify a ban on specific flame retardants or azo dyes, for example. The requirements range from duties to inform via the definition of limits through to a complete prohibition of use, in some cases depending on the textile's potential contact with the skin. The processing of natural fibres moreover frequently relies on biocidal products that are either directly included in the product by way of the fibre or applied later as an antimicrobial treatment. The European Textile Labelling Regulation

strongly in focus now could offer the textile industry an opportunity to formulate a substance regime in the medium term that extends beyond the scope of the Reach Regulation. With a consistent, standardized regulation for textile or leather products still lacking to date, every

company is required to examine its own product portfolio, production processes and applications in the market for itself.

Steps and measures for meeting the requirements

Looking at the requirements overall and their dynamics, one quickly becomes aware that the "material compliance" product attribute entails a high product liability risk. The impact of this risk is moreover drastically multiplied by the great public interest in compliance violations. Negative headlines that could lastingly damage a product's or company's image are found in the media almost every day, spurred on by environmental organizations and consumer associations. These circumstances have served to ensure that companies in the textile industry are making an active effort to integrate the requirements in their processes nowadays. A first step towards materials compli- ►

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► ance meanwhile involves defining the material-specific requirements pertaining to the product. These can be highly diverse for textiles because fabrics are often marketed for a great variety of applications. It is expedient to start off by examining the customer contracts and substance-related requirements formulated therein, as well as the laws and standards that are binding for compliance. All these requirements – compiled in a requirements list – form the basis for implementing the specifications on the product side. To enable their additional inclusion in processes as documents, it is recommended to create a company standard that regulates the material compliance specifications for employees on the inside and suppliers on the outside as a binding document. The company standard can thus serve as one of the most important instruments for conveying and holistically promoting the topic of material compliance with minimal financial and human resources.

Glossary:

Consumer Goods Ordinance: Specifies the materials permitted in consumer goods and their contamination limits for the human body

Biocides Regulation: (EU) No. 528/2012 concerning the making available on the market and use of biocidal products

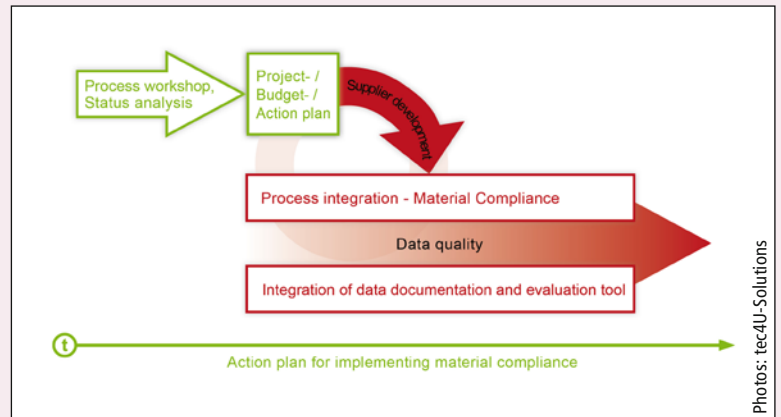
Germany's Federal Order Prohibiting Certain Chemicals: Regulation on bans and restrictions for the marketing of hazardous substances, preparations and products pursuant to the Chemicals Act

REACH: Regulation (EC) No. 1907/2006 concerning the registration, evaluation, authorisation and restriction of chemicals

Textile Labelling Regulation: Regulation (EU) No. 1007/2011 on marking the fibre composition of textile products

VDE standard DIN EN 50581: Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances; German version EN 50581:2012

action plan



The next step requires suppliers to be informed about material-related specifications and sensitized to them. This is ensured by means of relevant purchasing documents such as purchasing conditions, order forms and contracts, or also technical specifications. The legal framework for cases of non-compliance or liability is laid down at the same time. Detailed information about the individual specifications is not included in every single document itself, but merely by reference to the company standard, which acts as a master document. The greatest effort needs to be devoted to monitoring the compliance on the part of the suppliers, however. The implementation of the legislation specifies clear-cut requirements. It will therefore not suffice to merely accept generalized compliance statements. The "state of the art" formulated instead (e.g. in DIN EN 50581) is to query suppliers about the regulatory compliance of individual products and then monitor the veracity of their replies, possibly also with the help of laboratory tests. Besides reviewing their product information, the suppliers themselves also need to be rated in terms of their professional capacity to provide an adequate response to material compliance queries in the first place. As these communication and monitoring requirements are outside the scope of standard office applications, a suitable communica-

tion software is required to communicate the data in a targeted manner and ensure their legally compliant administration. This application should be particularly easy to understand and intuitive so that the suppliers are able to provide the data without difficulties.

Summary/Conclusion

Many years of experience in consultancy projects and in our operative support for supplier communications have shown that the implementation of material compliance requirements is inextricably linked with the extent in which a company has implemented the specifications as product attributes internally and externally, in its processes and documents. Another factor is the provision of adequate financial and human resources for mastering this task. If one of these factors is absent, a company's activities could be regarded as negligent, which will often preclude liability insurance payments if there is a claim. Material compliance is also an important guarantor of success when it comes to ensuring product quality throughout the delivery chain.

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