

RCS/GRS Revision Call

November 16, 2016

Topic: Chemical

Call Agenda

- Introductions
- Reminder of Chatham House Rules & Anti-Trust Guidelines
- Review of Existing Chemical Section
- Potential Changes
- Questions to be addressed

Questions: Post-consumer textiles and their residues have been extensively tested. Brands are very concerned with this feedstock. Brands are concerned with the final product on the shelves and that they contain the chemicals in the RSL. Getting clean feedstock is very low volume. Washing the garments with enzyme based detergent gets rid of these chemicals. Archroma and other companies are working together to have a solution within the next few weeks. Yarn is tested with labs and are now moving to industrial trials. What will Greenpeace and consumer bodies say? The testing method could be relevant for the GRS.

Many brands are concerned about the residues in the input material, will this be covered by the standard? It was not in the materials sent out prior to the call.

It is not in the current version of the standard. Currently there are no reliable test methods to determine the amount of residues in post-consumer textiles. If the decision was taken to include this into the scope, testing at the yarn stage (or equivalent second stage in other industries) could be a good way to overcome the challenges presented by source material. This decision will need to be made in one the calls dealing with the scope of the standard. We do not feel that it is reasonable at this stage to introduce a requirement for this type of testing. Our sense is that it is too early in development.

Chemical Requirements - Current Version

- Chemical Management System
- Prohibited Substances
 - REACH
 - Prohibited Substance List
 - Hazard Codes
- Verification of Compliance
 - Policies and Procedures (review of CMS)
 - Training records, etc.

- Chemicals on site and corresponding SDS
- Self-declaration of compliance
- Additional testing of substances (at the discretion of the CB)

Proposed Change: Replace the current GRS Prohibited Substance List with the ZDHC MRSL

ZDHC is managed by experts – not with TE who are not chemical experts – continually, whereas the GRS Prohibited Substance List or a Positive List would not be updated as often and require a chemical assessment protocol. Our current Prohibited Substance List is only listed in categories, and not in a format that is helpful to companies aiming to comply.

Prohibited substances – you should not just ban substances. Banned means non-detectable according to a certain testing method. Impurities vs. intentionally used substances. “Usual industry methods” of testing needs to be said. Levels of chemicals present guarantee the safety of the product. They have no way to prove that the levels are what they say. This is why we need to adopt the ZDHC MRSL. Residual substances need a defined method if you are going to test.

ZDHC is only for textiles. Non-textiles would still need to meet REACH or the Hazard Code requirements. This could mean that the requirements for textiles are stricter than for other products.

There may be similar tools for other industries that could be adopted. More research is needed here.

The limit values on many substances on the ZDHC MRSL are lower than the limits for an SDS. This means that a substance could be present above the ZDHC MRSL required level, and not mentioned on the SDS. A manufacturer would not have a way to verify that the substance complies without testing.

In most cases, the chemical company should be responsible for verifying that a substance meets the criteria.

Would companies rely on this form of chemical substance verification?

We need to ask brands if they are willing to pay for added certification costs or even rely on GRS certification when they may still require their own testing. Comment: I do not think brands would rely on it.

Big brands are already apart of the ZDHC and are requesting companies comply.

We need to keep separate REACH and prohibited lists. There are suppliers selling chemicals that are required to make the REACH registration in EU. It would mean a significant increase in the cost of the standard to move from document checking to testing.

If we rely on just paperwork, it is not far enough above legal requirements to justify the cost of chemical analysis. The feedback TE has gotten is that the prohibited substance list is impossible to use. If we are going to include the restriction of chemicals, it needs to be a meaningful step above legal requirements.

Proposed Change: Require chemical substance testing based on risk.

If a CB determined that a chemical was higher risk, they could require testing of substances to verify compliance.

It is not necessary for CBs to test the substances directly, they could verify compliance to the MRSLS through other existing tests: the chemical suppliers own tests, third-party testing such as Greenscreen, Oeko-Tex's Ecopassport, bluesign, GOTS, etc.

Many chemical companies might buy from the main supplier and then sell further on. It could be difficult to require testing of the substance several stages back in the chemical substance's supply chain.

Proposed Change: Rely on other organization positive lists – make it formal in the standard that we accept the GOTS positive lists, and look into other acceptable lists as well. This would enable us to formally accept others like Greenscreen, Eco Passport, bluesign, etc.

Document review of the MSDS of the chemical with GOTS is working. 8,000 chemicals are approved already. Most chemicals are for natural fibers, fewer are for synthetics. The list would need to expand into synthetic fibers to be applicable for the GRS.

GOTS is a document check, but the documents are testing results as well. This is a step above just reading the MSDS. It is reliable. A different mechanism would be too costly. Every retailer is adopting their own standard and increasing the cost for manufacturers.

Proposed Change: Fill out chemical supplier information for all chemical suppliers.

- Name
- Address
- License to operate
- Relevant certifications
- List of supplied substances
- Any chemical test results
- What else to establish risk?

Should we try to collect more information about the chemical suppliers? Is it reasonable?

How far back would such a questionnaire go? Tier 1, 2? It could only be the first tier chemical supplier, i.e. the seller of substances to the manufacturer undergoing certification.

Substances sold by chemical suppliers can go through several steps. A dye supplier sells to someone to do the mixing, then a distributor who sells to end user. The list of supplied substances from the manufacturer final user and who they bought them from is all we are suggesting. Even whatever is on the invoice.

The point of such a questionnaire is to use it in a risk assessment of the chemical supplier. It should be clear where the substance comes from.

Food industry example – “Passport” Documentation rides along with the material for food safety.

Is this is a requirement of GOTS to supply information about chemical suppliers? No.

Proposed Change: Broaden chemical management requirements to facility level, instead of only for chemicals used in GRS products.

Social and environmental apply to entire facility. Chemicals only apply to those certified products. But are there requirements for the chemical management system that should apply to the entire facility? Should we try to move some to the environmental portion to make sure the facility manages all their chemicals in an environmentally safe way?

Yes!

Chemical storage, corresponding SDS for all chemicals in the inventory, proper disposal of containers, etc.