



Implications of REACH on Textile industry



REACH and What is REACH?

REACH is a new European Community Regulation on chemicals and their safe use. It deals with the following **R**: Registration; **E**: Evaluation; **A**: Authorisation; **CH**: Restriction of Chemical Substances

REACH entered into force on 1st June 2007. The basic aim of this Regulation is to ensure a high level of protection of human health and the environment, through a better and earlier identification of the intrinsic properties of chemical substances. This Regulation is based on the principle that it is for manufacturers, importers and downstream users to ensure that they manufacture, place on the market or use such substances that do not adversely affect human health or the environment.

Manufacturers and importers will be required to gather information on the properties of their chemical substances, which will allow their safe handling, and to register the information in a central database run by the [European Chemicals Agency \(ECHA\)](#) in Helsinki. The Agency will act as the central point in the REACH system: it will manage the databases necessary to operate the system, co-ordinate the in-depth evaluation of suspicious chemicals and run a public database in which consumers and professionals can find hazard information.

(For more information on the REACH regulation, please visit www.reach-onlyrep.eu)

How is REACH applicable to substances in articles?

An article is the term used by REACH to define items whose form defines their function to a greater degree than their composition. The legal definition for an article under REACH can be stated as an ***“an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition”***. (e.g. manufactured goods such as textiles, electronic chips, cars etc.).

REACH places certain obligations on legal entities who place articles (on the EU market or manufacture them in the EU) that contain chemical substances of very high concern as per the REACH regulation **Article 7: Registration and notification of substances in articles** and **Article 33: Duty to communicate information on substances in articles**.

Depending on the circumstances the obligations could include:

- Registering substances with the ECHA according to Article 7 & 33, if they are intended to be released during normal or reasonably foreseeable conditions of use of an article & this substance exceeds the tonnage threshold of 1 ton per annum in the total exports to Europe
- Notifying the ECHA of the presence of a SVHC (>0.1% and > 1 ton per annum) in an article if exposure to this substance cannot be excluded during normal or reasonably foreseeable conditions of use or disposal.
- Informing the recipient of the presence of a Substance of Very High Concern or SVHC (at >0.1% w/w) in any article they receive, and how to use the article safely, if necessary

What is Substances of very high concern (SVHC)?

Under REACH regulation, SVHC are the hazardous substances which may be inadvertently introduced in various consumer products due to the complexities of both supply chain and manufacturing process. To secure their sustainable competitive advantage, EU-based companies have started requesting their suppliers to justify the presence of SVHC in their products. Currently 30 substances have been identified as SVHC substances and more substances will come as SVHC during the course of time.

REACH considers substances to be of very high concern if they are:

- Carcinogenic, mutagenic or toxic for reproduction (CMR), categories 1 and 2 according to Directive 67/548/EEC
- Persistent, liable to bioaccumulate and toxic (PBT), or very persistent and very liable to bioaccumulate (vPvB) according to Annex XIII
- Others such as endocrine disruptors, PBTs and vPvBs not meeting Annex XIII criteria for which there is scientific evidence of probable serious effects to human health or the environment.

What are the implications of REACH on Textile industry

The textile sector is particularly very important to developing countries like India which account for 50% of the world's textile exports and 70% of its clothing exports. The main suppliers to the EU are in Asia (with India and China being the major suppliers). For India textile is one of the main source of export revenue and manufacturing employment.

Thus the textiles and clothing industry, which is an important user of chemical products, have to comply with this new regulation set by the European Commission. The textile industry uses a wide variety of dyestuffs and pigments, lubricating agents and oils, solvents, and other substances. These products can be divided into the following main groups:

1. Organic dyes and pigments;
2. Optical bleaches (fluorescent whitening agents);
3. Textiles auxiliaries i.e. pre-treatment, dyeing, printing, finishing, laminating.

This group is apart from the necessary base chemicals such as salts, organic and inorganic acids, or alkaline solutions and all other processing materials for textiles finishing.

SVHC chemicals used in textile industry

From the current list of substances which are commonly found in the textile industry, the following are the chemicals covered under the list of SVHC substances. In case a company has a substance listed in the SVHC list then the major obligation of the company is to comply with REACH regulation which is provided under the section named obligations under REACH Regulation.

Sr. No.	Name of the substance	CAS Number	EC number
1.	4,4'-Diaminodiphenylmethane	101-77-9	202-974-4
2.	Dibutyl phthalate	84-74-2	201-557-4
3.	Diarsenic trioxide	1327-53-3	215-481-4
4.	Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7	204-211-0
5.	Hexabromocyclododecane (HBCDD)	25637-99-4	247-148-4
6.	Alkanes, C 10-13, chloro (Short Chain Chlorinated Paraffins)	85535-84-8	287-476-5
7.	Bis(tributyltin)oxide	56-35-9	200-268-0
8.	Benzyl butyl phthalate	85-68-7	201-622-7
9.	Sodium dichromate, dihydrate (CMR)	7789-12-0 and 10588-01-9	234-190-3
10.	5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	81-15-2	201-329-4
11.	Anthracene	120-12-7	204-371-1
12.	Cobalt dichloride	7646-79-9	231-589-4
13.	Diarsenic pentaoxide	1303-28-2	215-116-9
14.	Lead hydrogen arsenate	7784-40-9	232-064-2
15.	Triethyl arsenate	15606-95-8	427-700-2
16.	Diisobutyl phthalate	84-69-5	201-553-2
17.	Tris(2-chloroethyl)phosphate	115-96-8	204-118-5

As a general case it has been observed that out of the 30 SVHC substances, majority of the chemicals are used in the process of textile manufacturing.

Deadlines to be met in case of substances in articles

In case of REACH registration for the substance in articles with intentional release, the deadline will depend on the tonnage exported to Europe. If the tonnage is over 1000 tons then the deadline to register is 30th Nov' 2010, if the tonnage is 100-1000 tons the timeline is 31st May' 2013 and for substance below 100 it is 31st May' 2018.

For substances included in the SVHC list **before 1 December 2010**, the notifications have to be submitted not later than **1 June 2011**

For substances included in the SVHC list on or after **1 December 2010**, the notifications have to be submitted **no later than 6 months after the inclusion**

Where to seek assistance on REACH & Substances in Articles

"Sustainability Support Services (SSS) (Europe) AB" is the one of its kind helpdesk ; set up exclusively to provide technical assistance and guidance as required for European manufacturer and importers of chemicals and chemical containing products to the European Union. SSS (Europe) AB represents over 650 companies that have availed its services on various aspects related to REACH compliance assistance and is the most sought after helpdesk for technical assistance on REACH

SSS (Europe) AB's expertise on REACH can be attributed to the fact that the organization has been studying REACH since the draft stage

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