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AMERICAN APPAREL & FOOTWEAR ASSOCIATION UPDATES RESTRICTED SUBSTANCES LIST RELEASE 15

The American Apparel & Footwear Association (AAFA) has published the 15th edition of the AAFA Restricted Substances List (RSL)¹ which covers apparel, footwear, travel goods, home textiles and other fashion accessories. The list provides apparel and footwear companies with information related to hazardous chemicals / substances that are restricted in consumer products and regulated around the world.

The AAFA RSL offers the US apparel and footwear industry a variety of tools to facilitate compliance that helps to make optimum sourcing decisions and assists the industry in creating a safer and sustainable supply chain. The latest AAFA RSL Release 15 was published with the major changes outlined in Table 1.

TABLE 1.

RESTRICTED SUBSTANCE, TEST METHOD, LIMIT AND COMMENTS MODIFICATION	
SECTIONS	CHANGES
Arylamines	Added to comment – “4-Amino azobenzene is not listed in GB 20400-2006. Only 23 arylamines are subject to this standard.”
Flame Retardants	- Added EU as other countries that also regulate Tris (2-chloroethyl) phosphate (TCEP) - Added to comment for TCEP – “New York ban applies to consumer products, such as baby products, toys, car seats, nursing pillows, crib mattresses, and strollers for intended for use by a child under three years of age” AND “The Canada requirement is only applied for children’s products (< 3 years) made of polyurethane foam”
Fluorinated Greenhouse Gases	Added to comment – “Regulation (EC) 842/2006 will be repealed by Regulation (EU) 517/2014 on January 1, 2015”

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¹ [AAFA RSL Release 15](#)

Metals	- Replace Denmark Regulation with "Statutory Order no. 1082 of September 13, 2007" for Lead (Pb) Restriction for Textiles: - Revised comment for leachable metal content (lead, chromium, mercury and arsenic) under China regulation FZ/T 81014-2008 and FZ/T 73025-2013 – "Applies to woven infant wear and adornment products (≤ 24 months) only" AND "FZ/T 73025-2013 [Knitted garment and adornment for infant] applies to infant knitted wear (≤ 36 months) or body height (≤ 100cm)" Restriction for Leather: - Added to comment for Chromium (VI) – "European Union REACH Regulation (EC) No. 1907/2006 Annex XVII requirement: <3 ppm (applies from May 1, 2015)" Restriction for Plastics and Plastic Film: - Added Chromium (VI) as regulated item for Taiwan CNS 15503 with requirement 10 ppm for children products, test method CNS 15531 Annex A and B Restriction for Surface Coatings and Printing: - Added requirement 75 ppm to Cadmium (Cd) for South Korea
Miscellaneous	Formaldehyde: - Added test method CNS 15580-1 for Formaldehyde 0-36 months old - Added test method CNS 15579 for Formaldehyde > 36 months old (with direct skin contact) - Revised comment – "South Korea define baby products as 0-36 months old" - Added Formaldehyde as regulated item for China QB/T 4331 with requirement ≤ 75 ppm for infant athletic shoes and skin contact components in children's athletic shoes, test method GB/T 2912.1-2009 for textile and GB/T 19941-2005 for leather - Added Formaldehyde as regulated item for China with requirement ≤ 300 ppm for non-skin contact components on children's athletic shoes, test method GB/T 2912.1-2009 - Added Formaldehyde as regulated item for China with requirement ≤ 75 ppm for textiles and artificial leather on upper, lining and insole of vulcanized shoes – infant shoes, test method GB/T 2912.1-2009 - Added Formaldehyde as regulated item for China with requirement ≤ 150 ppm for textiles and artificial leather on upper, lining and insole of vulcanized shoes – other shoes, test method GB/T 2912.1-2009 Perfluorooctane sulfonate (PFOS): - Added Switzerland as other countries that also regulate PFOS Nonyl phenoethoxylates: - Added test method "BS EN ISO 18254 Textile – Methods for the Detection and Determination of

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	Vinyl Chloride Monomer (VCM): - Added Germany as other countries that also regulate VCM by Bedarfsgegenstände Verordnung "German Consumer Goods Ordinance" N-Nitrosamines: - Added to comment – "only applicable for rubber component on vulcanized shoes" Polycyclic aromatic hydrocarbons (PAH): - Added requirement "Benzo(a)pyrene: 1 mg/kg and Total of 16 PAH: 10 mg/kg" for Taiwan Organotin Compounds: - Added test method DIN ISO/TS 16179:2012-08 for Tributyltin (TBT) and Triphenyltin (TPhT) - Added Japan as other countries that also regulate Triphenyltin (TPhT) - Added "recommended test method EN ISO 17353 (modified)/ EN ISO/TS 16179:2012 for footwear" for all tri-substituted organotin compounds including TBT and TPhT - Added test method KS K 0737 and DIN ISO/TS 16179:2012-08 for Dibutyltin (DBT) and Dioctyltin (DOT) - Added to comments for Dioctyltin (DOT)– "EU requirement applicable to some specific products, such as textiles with direct skin contact, childcare articles, etc."
Pesticides	- Added regulation "European Union POPs Regulation (EC) No. 505/2004 Annex I" and "Switzerland: ChemRRV (Chemikalien-Risikoreduktions-Verordnung) Art 3 Appendix 1.1" for pesticides - Added Endosulfan and its isomers (CAS# 115-29-7, 959-98-8, 33213-65-9), Pentabromobenzene (CAS# 608-93-5) and Hexabromobiphenyl (CAS# 36355-01-8) under "European Union POPs Regulation (EC) No. 850/2004 Annex I" with requirement prohibited - Added 4,6-Dichloro-7-(2,4,5-trichloro-phenoxy)-2-trifluoromethylbenzimidazole (DTTB) (CAS# 63405-99-2) under "Japan Law for Control of Household Products" for textile products with requirement ≤ 30 ppm - Removed Lindane (CAS# 58-89-9) - Revised Pentachlorophenol (PCP) requirement to "Not used (textile and leather); ≤ 5 mg/kg (wood based materials)" under "Switzerland: ChemRRV (Chemikalien-Risikoreduktions-Verordnung) Art 3 Appendix 1.1 and Appendice 2.17"
Phthalates	- Revised Denmark regulation to "Denmark Statutory Order 855 of 05/09/2009" - Added test method CNS 15138 for Dimethyl phthalate (DMP) and Diethyl phthalate (DEP) - Added 1,2-Benzenedicarboxylic acid, Dihexyl ester, Branched and linear (CAS# 68515-50-4) under "European Union REACH Regulation (EC) no. 1907/2006 Candidate List" with requirement 0.1% w/w per article

Other changes from Release 14 to Release 15:

- Updated the REACH SVHC Candidate List in Appendix I - Reporting

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