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JAPAN PROPOSES TO REGULATE AZO DYES IN HOUSEHOLD PRODUCTS

On 17 December 2014, the Ministry of Health, Labour and Welfare (MHLW) of Japan notified the World Trade Organization (WTO) of its intention to designate azo dyes as harmful substances under the Act on Control of Household Products Containing Harmful Substances. According to the document released by the Committee on Technical Barriers to Trade of the WTO, such regulation is scheduled to enter into force on 1 April 2016¹.

The Act on Control of Household Products Containing Harmful Substance regulates household products that contain hazardous substances. Only household products that conform to the criteria stipulated by the Ordinance for Enforcement of the Act are allowed to be marketed in Japan.

In 2012, the Ministry of Economy, Trade and Industry (METI) urged the Japanese textiles and leather industry to adopt the voluntary Azo standards to eliminate the use of hazardous Azo colorants in textile and leather products². Now, the new proposed regulation on Azo dyes as hazardous substances will be introduced through government ordinances under the Act on Control of Household Products Containing Harmful Substances.

Proposed amendments to the Act on Control of Household Products Containing Harmful Substances:

1. The scope of 'household products containing the azo compounds' that are subject to the regulation:
 - Textile products with azo dyes: diapers, diaper covers, underwear, sleepwear, gloves, socks, intermediate garments, outer garments, caps, hats, bedding, floor coverings, tablecloths, collar ornaments, handkerchiefs, towels, bath mats and related products
 - Leather and/or fur products with azo dyes: underwear, gloves, intermediate garments, outer garments, caps, hats and floor coverings
2. The presence of any of the specified 24 aromatic amines (Table 1) is restricted to less than 30 mg/kg when tested with a gas chromatograph mass spectrometer



¹ [WTO Notification](#)

² [SGS-Safeguards 068/12](#)

In addition, the proposed amendments also covered the following:

3. Revision of the test method by using gas chromatograph mass spectrometer instead of flameless atomic absorption spectrometry and two-dimensional thin layer chromatography for household products containing triphenyltin (TPT) and tributyltin (TBT) compounds
4. Revision of the test method by using acetic acid – ammonium acetate buffer solution instead of purified water in the absorbance measurement process for household products containing formaldehyde.

TABLE 1. MHLV DESIGNATES AZO COMPOUNDS THAT MAY CAUSE THE FORMATION OF ANY OF THE FOLLOWING 24 HARMFUL AROMATIC AMINES IN LEVELS GREATER THAN 30 mg/kg AS HARMFUL.

1.	4-aminoazobenzene	13.	3,3'-dichlorobenzidine
2.	2-amino-4-nitrotoluene	14.	3,3'-dimethyl-4,4'-diaminodiphenylmethane
3.	4-aminobiphenyl	15.	3,3'-dimethylbenzidine
4.	4,4'-oxydianiline	16.	3,3'-dimethoxybenzidine
5.	o-anisidine	17.	4,4'-thiodianiline
6.	o-aminoazotoluene	18.	2,4,5-Trimethylaniline
7.	o-toluidine	19.	2,4-toluylendiamine
8.	2,4-xylylidine	20.	2-naphtylamine
9.	2,6-xylylidine	21.	p-cresidine
10.	4-chloro-o-toluidine	22.	p-chloroaniline
11.	2,4-diaminoaniline	23.	benzidine
12.	4,4'-diaminodiphenylmethane	24.	4,4'-methylene-bis-(2-chloro-aniline)

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