

KEEPING TEXTILES WITH TOXIC SUBSTANCES AWAY FROM THE EU-MARKET

RESULTS & CONCLUSIONS OF REACH4TEXTILES

REACH4Textiles, an exploratory two-year study commissioned by the European Commission shows that although the vast majority of our clothes do not contain substances of concern, gaps in REACH compliance can be found.

INTRO

All companies that manufacture, import and/or sell textile products in the European Union must comply with very strict chemical regulations to protect our health and environment.

Complying with these regulations is a time-consuming and continuous effort, requiring investments in research and innovation, specialised staff and equipment. **ENSURING THAT ALL COMPANIES FOLLOW THE SAME RULES AND REGULATIONS IS KEY TO CREATING A LEVEL PLAYING FIELD!**

However, the market is severely distorted by the huge influx of imported textile products from outside the EU, where rules tend to be less stringent. Moreover, e-commerce and fast fashion lower the barriers for producers and buyers, while customs authorities are understaffed, underfunded, under-trained and under-equipped to monitor all imported goods.

Textiles that are sold on the European market do not always comply with REACH and may contain harmful chemicals. RAPEX reports show that in 2017 clothing was the third most important class of non-compliant materials after toys and motor vehicles. In 22% of cases, the notified risks were related to chemicals.

In 2012, as part of its Dirty Laundry campaign, Greenpeace tested 78 textile materials sold by major international brands and found several banned or heavily restricted substances, including NPE (nonylphenol ethoxylates).

While major brands (± 80 companies) have made significant progress in phasing out hazardous chemicals, they represent only 15% of the global garment production.



ec.europa.eu/eurostat

THE SAME LEVEL OF SAFETY AND PROTECTION REQUIREMENTS SHOULD APPLY THROUGHOUT THE EUROPEAN SINGLE MARKET, REGARDLESS OF WHERE A PRODUCT IS MANUFACTURED. A UNIFORM AND COORDINATED IMPLEMENTATION OF THESE RULES ACROSS THE EU, INCLUDING THE CONTROL AND SANCTIONING POWERS OF THE RELEVANT NATIONAL AUTHORITIES, SHOULD ENSURE THAT UNFAIR COMPETITORS DO NOT FIND A LOOPHOLE TO ENTER THE EU THROUGH COUNTRIES WHERE THEY ENCOUNTER LESS RESISTANCE OR LAXER REGULATIONS.

Market surveillance authorities have to prevent unsafe products from entering the European market and unfair competition from companies that disregard the rules. This is a challenging task, especially when it comes to REACH. Indeed, special tests are needed to prove that a textile material is REACH compliant. Market surveillance also has a limited budget and testing can be expensive. But with the right understanding of the textiles, the textile processes and the claimed properties, a more targeted approach is possible, leading to a better use of the available resources.

THEREFORE REACH4TEXTILES BROUGHT TOGETHER LEGISLATORS, MARKET SURVEILLANCE AUTHORITIES, CONTROL LABS, THE TEXTILE AND CLOTHING INDUSTRY, AND THEIR REPRESENTATIVES TO SHARE KNOWLEDGE ON TEXTILES AND CHEMICALS METHODOLOGIES TO MAKE MARKET SURVEILLANCE MORE EFFECTIVE AND CONTRIBUTE TO A LEVEL PLAYING FIELD IN THE TEXTILE MARKET.

LEGISLATION

The European Union has the world's most comprehensive chemical legislation to protect consumers, the environment and, theoretically, the competitiveness of responsible companies. The EU chemical legislation is constantly evolving, widening its scope and ambition. New restrictions imply new legal obligations and additional costs for authorities and sectors such as the European textile value chain.

However, this advanced regulatory framework is not supported by an equally advanced or effective EU-wide control system capable of ensuring compliance especially in the case of imported products.

Those small residues of chemicals are not yet an immediate threat to public health, but they are a risk to the environment in the long run. The fact that such items get past customs may encourage non-EU suppliers to be more lax about the strict rules. It also undermines European textile companies.

REGULATION (EU) 2019/1020 lays down a harmonised framework for market surveillance, complementing existing product legislations on the compliance of non-food products in the EU market. Market surveillance is the responsibility of the Member States.

The textile sector also faces the challenge of an extremely complex interaction of other regulations (e.g. REACH, CLP, BPR, MDR). Together, these regulations have a cumulative effect that must be coordinated by the national market surveillance authorities of the Member States.

REACH sets limit values for substances in textiles such as cadmium, chromium, arsenic, lead, polyaromatic hydrocarbons (PAHs) and certain phthalates. The Regulation bans these substances in clothing, footwear, accessories and textiles in furniture. The prohibition of these substances is necessary to ensure the safety of textiles for the protection of the environment and human health. These substances are used at different stages of the textile production life cycle, such as during dyeing, but also during manufacturing and integration, to give products specific properties.

POPS REGULATION bans or severely restricts the production and use of persistent organic pollutants. Persistent organic pollutants (POPs) are toxic chemicals that adversely affect human health and the environment around the world.

EVERY YEAR, ABOUT 28 BILLION GARMENTS CIRCULATE ACROSS EUROPE, 80% OF WHICH ARE IMPORTED FROM OUTSIDE THE EU AND ITS JURISDICTION. INEVITABLY, SUCH HUGE VOLUMES ARE A CHALLENGE FOR MARKET SURVEILLANCE AUTHORITIES WHO HAVE TO ENSURE THAT NON-COMPLIANT DANGEROUS PRODUCTS ARE KEPT AWAY FROM EU CITIZENS.

SAMPLING & TESTING

Together with our European partners (Euratex, Textil+Mode, Tessile e Salute, Centrocot), Centexbel purchased 160 pieces of textiles for chemical analysis in different member states between May 2022 and February 2023.

The items were sampled both online and in fast-fashion clothing shops, outlets and at local markets.

26 ITEMS - OR MORE THAN 16 % OF THE TESTED ARTICLES - DID NOT COMPLY WITH REACH, INCLUDING BABY CLOTHES, UNDERWEAR, SWIMWEAR, PYJAMAS AND REGULAR CLOTHING.

THE RESULTS AND FINDINGS OF REACH4TEXTILES

REACH4Textiles has outlined the relevant market surveillance authorities for textiles in Europe, potential overlaps and cooperation levels between the authorities with a particular focus on the enforcement of textile labelling and textile REACH compliance in EU Member States and the EEA, Switzerland and Turkey.

REACH4Textiles has also conducted two testing campaigns (160 articles were tested by means of 2374 tests)

THE PROJECT IN FIGURES

- Total number of tests performed: 2374
- total number of failed tests: 43
- failure rate: 1.81%
- Total number of tested articles: 160
- total number of non-compliant articles: 26
- failure rate: 16.25%

COUNTRIES OF ORIGIN VERSUS TOTALITY OF NON-COMPLIANT ARTICLES

- 42.31% China*
- 23.08% unknown
- 1.54% Bangladesh
- 3.85% (Portugal, Pakistan, North Macedonia, Burma, The Netherlands and India)

OTHER OBSERVATIONS

- Highest non-compliance rate on chromium VI, followed by nickel release, phthalates, NPEO, SCCP/MCCP, PAH's, metals, quinoline and carcinogenic amines.
- Non-compliant articles were found in all textile categories (except for bedlinen): babywear, underwear/ swimwear, nightwear, apparel, outerwear & other
- Non-compliant articles were encountered in every type of market: brand shop, fast fashion or retailer, local market, online high/low level, online China and outlet center.

RISK-BASED TESTING MATRIX	TESTING PARAMETERS																
	CARCINOGENIC AMINES	PHthalATES	NPEO	CADMIUM	PAH'S	PFCS	CHROMIUM VI	ORGANOTIN COMPOUNDS	DMF	LEAD	SCCP/MCCP	FORMALDEHYDE	QUINOLINE (SYNTHETIC MATERIAL)	SILOXANES	NICKEL	BISPHENOLS	PCP
COLOURED FABRICS (MIDDLE EAST)	RELEVANT TO TEST		RELEVANT TO TEST										ONLY DIRECT SKIN CONTACT				ONLY SOFT PLASTIC PARTS
PRINTS	ONLY TEST ON RECYCLED MATERIALS AND/OR ARTICLES PRODUCED IN COUNTRIES FROM THE MIDDLE EAST		RELEVANT TO TEST		RELEVANT TO TEST					RELEVANT TO TEST			ONLY DIRECT SKIN CONTACT				
PLASTIC, RUBBER PARTS (TEETH ZIPPER, BUCKLE, BUTTON)					ONLY SOFT PLASTIC PARTS					RELEVANT TO TEST							
WATER RESISTANT, REPELLENT FABRICS						RELEVANT TO TEST						ONLY DIRECT SKIN CONTACT					
TEXTILES WITH IRON FREE FINISH												ONLY DIRECT SKIN CONTACT					
PU-COATED MATERIALS/PU PRINTS		ONLY COATED LEATHER	RELEVANT TO TEST		RELEVANT TO TEST			RELEVANT TO TEST		RELEVANT TO TEST							
PVC-COATED MATERIALS					RELEVANT TO TEST					RELEVANT TO TEST							
LEATHER		ONLY COATED LEATHER		RELEVANT TO TEST			RELEVANT TO TEST			RELEVANT TO TEST		ONLY DIRECT SKIN CONTACT					RELEVANT TO TEST
PA/ELASTANE OR MIXTURES			RELEVANT TO TEST														RELEVANT TO TEST
WOOL, RECYCLED WOOL			RELEVANT TO TEST				IF DARK										RELEVANT TO TEST
METAL PARTS				RELEVANT TO TEST						RELEVANT TO TEST					ONLY DIRECT SKIN CONTACT		
ELASTIC PARTS			RELEVANT TO TEST		RELEVANT TO TEST												
FOAM								RELEVANT TO TEST									
SILICONE FROM CHINA								RELEVANT TO TEST						RELEVANT TO TEST			
PRINTED SILK																	RELEVANT TO TEST

	RELEVANT TO TEST
	ONLY TEST ON RECYCLED MATERIALS AND/OR ARTICLES PRODUCED IN COUNTRIES FROM THE MIDDLE EAST
	ONLY SOFT PLASTIC PARTS
	ONLY COATED LEATHER
	ONLY DIRECT SKIN CONTACT
	PES AND RECYCLED MATERIALS



FINAL CONCLUSIONS

1ST TEST CAMPAIGN every non-compliant article failed on only one parameter

2ND TEST CAMPAIGN more targeted selections based on the input from the 1st test campaign resulted in multiple failures per non-compliant article.

- Risk-based approach is working
- Buy enough material for testing
- The project has defined all higher risk chemicals and product groups
- The tested textiles articles that are OEKO-TEX® certified fulfill all legal requirements

HOW CAN YOU BE SURE THAT THE TEXTILES YOU BUY ARE SAFE?



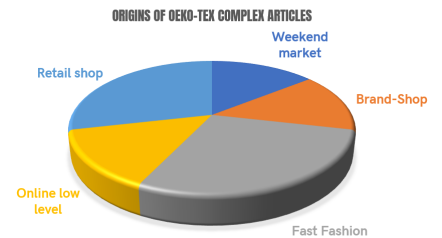
LOOK FOR THE OEKO-TEX® LABEL

During the REACH4Textiles project, Centexbel and partners conducted two test campaigns, from which all tested OEKO-TEX® certified products emerged as fully REACH compliant.

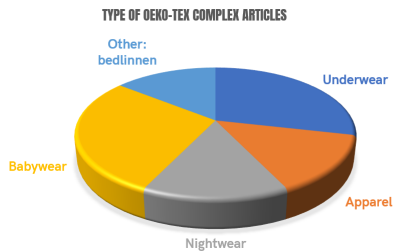
THE OEKO-TEX® STANDARD 100 & OEKO-TEX® LEATHER STANDARD TEST SPECIFICATIONS ARE ANNUALLY UPDATED TO REFLECT AND EVEN ANTICIPATE STRICTER ENVIRONMENTAL AND CHEMICAL REGULATIONS, BECAUSE THE OEKO-TEX®'S STRATEGY HAS NEVER BEEN TO WAIT FOR LEGISLATION BUT TO ACT PROACTIVELY IN THE FIELD OF CONSUMER PROTECTION.



Street market	1
Brand-Shop	1
Fast Fashion	2
Online low level	1
Retail shop	2



Underwear	2
Apparel	1
Nightwear	1
Babywear	2
Other: bedlinnen	1



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