REACH 2018 and beyond

European Textile Industry Challenges
How textiles are made?
Textile value chain

Source: Roos (2016) “Advancing life cycle assessment of textile products to include textile chemicals”
What happens today?

• Brands’ MRSL/RSL ensure safety of products
• Recent “textile” EU regulation, to apply in 2 years
New regulatory action targeting T&C sector

- KEMI and ANSES action to restrict substances causing allergic contact dermatitis from clothes and textiles

Which substances?
Skin sensitisers (1/1A/1B); Skin irritants 2; Skin Corrosives 1/1A/1B/1C found on finished articles
→ approx. 350 substances

Which products?
Finished textile and leather articles, hides and furs with direct and prolonged skin contact
How EURATEX deals with the new restriction proposal?

- First task: provide an official response to ECHA Call for Evidence (Sept 2018)

- Who to talk to in the textile value chain?
  - Textile suppliers
  - Testing labs
  - Member associations
  To obtain an EU wide picture of the sector

- Talks with other sectors
  - Downstream and upstream sectors, for further knowledge
Key considerations

1) Target substances that remain on finished article
2) Exclude skin irritants and corrosives
3) Consider harmonised classification
4) Focus on risk assessment
5) Avoid double regulation

Aim: to achieve a meaningful and enforceable restriction
Preparing for next steps:

• Focusing on substances that **matter**:

  ➢ In which textile and clothing articles is the substance present?
  ➢ What is its function in the final article?
  ➢ Can the substance migrate and be absorbed by the skin?
  ➢ Can the substance be replaced? ... etc.

Long process...
First draft of the restriction might be available in 2020
Substitution – case of PFOA restriction

- Baby’s jacket, Outdoor jacket, pajama, etc...
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- Uniform of an oil rig worker, firefighters’ uniform, etc

COMMISSION REGULATION (EU) 2017/1000
of 13 June 2017


(b) 4 July 2023 to:

(i) textiles for the protection of workers from risks to their health and safety;
Substitution – case of PFOA restriction

- EURATEX, MIDWOR team, AEI Tèxtils coorganized a workshop in Barcelona March 2017 gathering different actors in the textile supply chain

- Testing alternatives in all applications, considering reaction with other chemicals... → more of this type of research in the future
Other key challenges

• Addressing chemicals of concern in the circular economy
• Planned restrictions on short-chain PFASs
• Planned restriction on formaldehyde & its releasers in consumer articles
Conclusions

• Complex restriction needs consideration of the entire value chain
• Hard case on substitution – “one size does not fit all”
• Challenges in the circular economy
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