



## **“Hazardous Substances in Textile Products” (RIVM Report 2014-0155)**

The undersigned find that the study shows **a well-balanced approach** to the issue of chemicals and textile and provide a useful general overview of the current situation. The prioritization method is reasonable and based not only on the classification of the substances (as many other studies did in the past) but also on additional aspects like toxicity and estimated consumer exposure. Furthermore, the authors also underline the central role of the risk assessment in drawing conclusions about the effective risk for the consumer.

It is also very sensible, in our opinion, that **complementary data are taken into account as a reality check** for the actual relevance of well-known issues (e.g., presence of allergenic dyes on the market).

The performed assessment of existing evaluation tools clearly shows their limits and potentialities, and provides **a solid basis** for the discussion on their future development.

However, some small clarifications should be made.

1. It has to be considered that the number of specific dyes mentioned in the non-confidential part of the substances evaluation is very limited; therefore only general comments are possible:
  - The assumption that some dyes, e.g. direct and acid dyes, bind very loosely to the fibers and therefore easily migrate to the skin, mixes up different concepts and leads to a misunderstanding. The kind of chemical bond between the dye and the fiber does not automatically relate to an easy migration. **The appropriate parameters indicative for the migration from the dyed textile are the different fastness values.** For the skin in particular, the perspiration fastness reflects the characteristics of the specific dyes and the specific substrate.
  - The description “carcinogenic organic compounds such as azo dyes” is imprecise. **The carcinogenicity is usually linked to the amines** which could result from a potential cleavage of the dyes, not to the dyes themselves.

- As regards the recent Keml report summarized in Section 4.4, our respective associations provided in November 2014 a detailed feedback on the document to the European Commission and Member States. Among others, we strongly criticized **the inappropriate use of the Colour Index Database** as a source of information on dyes currently on the market. This led to a misleading high number in the Keml report.
2. To improve the prioritization method, further work should also **consider the relevance of the identified substances** for the textile and clothing industry. Most of the substances of Table 10: “Substances with highest priority scores” have a very limited significance in the production of textiles and clothing nowadays.
  3. Regarding the availability for a broad consumer exposure to the skin, RIVM should take into account, mentioning only a few examples here, that **most textiles for consumer use have no flame retardant finishing anymore** (this is limited to PPE), **no organic tin substances** (these substances were used in the past as biocides), **no cadmium** (it is only relevant for PVC-coatings, these days only in use for technical textiles) etc.
  4. As far as the discussion in chapter 7.2 is concerned, it **is necessary to perform a correction of the priority score** via a manual screening of the results according to the relevance for the textile and clothing industry.
  5. The prioritization should **take into account the probability that the substance is still in the finished textile after all processing** steps and exclude intermediates from the scope.

As a final remark, with the interest on hazardous substances in textiles remaining constant, **we think it is important for our associations to keep being involved in ongoing national and international projects and help clarify open questions on the safety of textile products.**

As recent examples:

- ETAD has already started to collaborate with the Swiss authorities as regards the findings described in their publication on non-regulated amines, also mentioned in the Netherlands’ RIVM report.
- The Association of the Textile and Clothing Industry of Northwest Germany is working together with its member companies (especially importing clothing companies) to perform a method for risk assessment for some “critical” substances” and their relevance for which kind of textile. The results might be a supplement to the RIVM study.

**EURATEX and ETAD would be quite glad for continuing communication and cooperation with the Dutch authorities in case they decide on further steps for the “Hazardous substances in textiles”.**

## **EURATEX in short**

The European Apparel and Textile Confederation – EURATEX – is the political voice of the Textile and Clothing (T&C) industry in Europe. The mission of EURATEX is to promote the competitiveness and the sustainable growth of the industrial T&C pipelines in Europe by promoting the interests of the industry towards European and international institutions.

EURATEX represents, in the EU, some 186.000 companies of an industry employing 1.8 million workers. The companies which are overwhelmingly small and medium sized enterprises cover a broad industry cross-section in terms of product, market segment and geographical spread. With a household consumption of more than 500 Billion Euro, the EU-28 is the largest world market for textile and clothing products. Furthermore, it is the second world exporter in textiles as well as in clothing.

*ELMASSI Adil*

*Euratex*

*24 rue Montoyer – B – 1000 Brussels*

*Phone : 32.2.285.48.84*

*Fax : 32 .2.230.60.54*

*E-mail: [adil.elmassi@euratex.eu](mailto:adil.elmassi@euratex.eu)*

*[www.euratex.eu](http://www.euratex.eu)*

## **ETAD in short**

The Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD) is an international organization founded in 1974 to represent the interests of these industries on matters relating to health and the environment. ETAD focuses on the safety of colorants and coordinates the efforts of its members to minimize any possible adverse impact of organic colorants. To achieve this goal ETAD collects all relevant information and starts appropriate projects, often in collaboration with authorities and other associations. As regard textiles, the association's latest activities include the participation in the Technical Advisory Committee of the Zero Discharge of Hazardous Chemicals group, in the GOTS revision group, in the PROSAFE project and in the 2012-2013 EU project on sensitizing substances in textiles. ETAD is also a member of the German Committee "Textiles and leather", part of the Federal Institute for Risk Assessment BfR.

*FOIS Pierfrancesco*

*ETAD*

*Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers*

*Stadthausgasse 18 - CH-4051 Basel*

*Tel: +41 61 690 99 63*

*Fax: +41 61 691 42 78*

*E-mail: [pfois@etad.com](mailto:pfois@etad.com)*

*[www.etad.com](http://www.etad.com)*