



Methodology for the Screening of Substances used in the Production of Esprit Apparel, Footwear and Accessories for Potentially Hazardous Substances

30/01/2017

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1. INTRODUCTION

Making fashionable clothing requires many different manufacturing processes, including fabric manufacturing, dyeing, printing and a variety of different finishing washes, not to mention the actual cutting and sewing of the garments. Many of these processes can have negative impacts on the environment, and thus need to be managed in the most responsible and sustainable way possible. In times of climate change, heavy pollution, and water scarcity, we all have to rethink our operations and find solutions to preserve our planet. Esprit has analyzed and monitored our supply chain to identify areas where we need to improve manufacturing processes.

Ensuring a sustainable business also means ensuring a safe product range. Therefore, the monitoring of chemicals used in the manufacturing of our products is a high priority and constant focus at Esprit. We are continuously working on the identification of chemicals of concern and apply the precautionary principle in our evaluation.

2. DESCRIPTION OF THE METHODOLOGY

Esprit has established a “Minimum Requirements Steering Committee” (EMRSC) to oversee comprehensive screening of applicable legislation in markets where Esprit apparel, footwear and accessories are sold, including the latest findings of test institutes, NGO demands, industry trends, and demands of Esprit’s wholesale customers and end-consumers, in order to ensure the implementation of appropriate control measures throughout its supply chain.

The EMRSC has defined the approach below in order to assure thorough and on-going evaluation of the chemicals that are used for the fabrication of Esprit products (= all items labelled “Esprit” or “edc”).

3. SCREENING OF RELEVANT SOURCES OF INFORMATION

In accordance with the Precautionary Principle, Esprit closely monitors a variety of important and reliable sources of information regarding chemical properties or safety of Esprit products. These are mainly the following:

3.1 Legal Requirements for Esprit products according to chemical substances and/or substance groups in the sales countries for Esprit products

Europe	Bundesinstitut für Risikobewertung (BfR)	www.bfr.bund.de
	Bundesamt für Verbraucherschutz und Lebensmittelsicherheit (BVL) (Federal Office of Consumer Protection and Food Safety) (BVL)	www.bvl.bund.de
	Bundesministerium der Justiz und für Verbraucherschutz (Federal Ministry of Justice and Consumer Protection)	www.bmjuv.de
	Bundesanstalt für Arbeitsschutz und Arbeitsmedizin (BAuA) Federal Institute for Occupational Safety and Health (BAuA)	www.baua.de
	European Chemicals Agency (ECHA)	echa.europa.eu
	European Commission: Textiles and Clothing Legislation Rapid Alert System for dangerous non-food products	<ul style="list-style-type: none"> • http://ec.europa.eu/growth/sectors/fashion/textiles-clothing/legislation/index_en.htm • http://ec.europa.eu/consumers/consumers_safety/safety_products/rapex/alerts/repository/content/pages/rapex/index_en.htm
	European Committee for Standardization	www.cen.eu/Pages/default.aspx
	Stockholm Convention	http://chm.pops.int/Home/tabid/2121/Default.aspx
	Denmark: Ministry of Environment and Food of Denmark – Environmental Protection Agency	http://eng.mst.dk
	Ireland: electronic Irish Statute Book (eISB)	www.irishstatutebook.ie
	Netherlands: Government of the Netherlands - Ministry of Health, Welfare and Sport	www.government.nl/ministries/ministry-of-health-welfare-and-sport
	Norway:	
	<ul style="list-style-type: none"> • Norwegian Environment Agency • Ministry of Justice and Public Security 	<ul style="list-style-type: none"> • www.miljodirektoratet.no/en • www.regjeringen.no/en/dep/jd/id463
	Sweden:	
	<ul style="list-style-type: none"> • Swedish Chemicals Agency • Swedish Consumer Agency 	<ul style="list-style-type: none"> • www.kemi.se/en • http://www.konsumentverket.se/languages/english-engelska/
	Switzerland: The Federal Department of Home Affairs (FDHA)	https://www.admin.ch/gov/en/start/departments/departement-home-affairs-fdha.html
	United Kingdom: The Official Home of UK Legislation	www.legislation.gov.uk/

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APAC	Australia: Australian Competition & Consumer Commission (ACCC) Australia Standard	www.accc.gov.au/ www.standards.org.au/Pages/default.aspx
	China: Quality Dep. Of P.R.China (AQSIQ) Custom Inspection (CIQ) China Consumer Association Standardization Administration of P.R.China (SAC)	http://english.aqsiq.gov.cn/ www.shciq.gov.cn www.cca.org.cn/ www.sac.gov.cn
	Indonesia: Ministry of Industry	http://regulasi.kemenperin.go.id/site/baca_peraturan/12662
	Korean Agency for Technology and Standards (KATS)	www.kats.go.kr/en/
	Japanese Law Translation Database	www.japaneselawtranslation.go.jp/
	NCS: Certificate Authority Russia and CIS	http://gostr-certificat.com/
	Saudi Arabia: of Commerce and Investment	https://mci.gov.sa/en/Pages/default.aspx
	Taiwan: Bureau of Standards, Metrology & Inspection (BSMI), M.O.E.A, R.O.C.	www.bsmi.gov.tw/wSite/mp?mp=1
North America	Vietnam: Ministry of Industry and Trade	www.moit.gov.vn/vn/Pages/ChiTietVanBan.aspx/
	ASTM International	https://www.astm.org/
	California Office on Environmental Health Hazard Assessment (OEHHA)	http://oehha.ca.gov/
	US Consumer Product Safety Commission (CPSC)	www.cpsc.gov/
	United States Environmental Protection Agency (EPA)	https://www.epa.gov/
	US State of Washington: Department of Ecology	www.ecy.wa.gov/
	Maine Department of Environmental Protection	www.maine.gov/dep/safechem
	Innovation, Science and Economic Development Canada	https://www.ic.gc.ca/eic/site/textiles-textiles.nsf/eng/h_tx03203.html
South America	Health Canada	http://www.hc-sc.gc.ca/ahc-asc/index-eng.php
	Associacao Brasileira da Industria de Higiene Pessoal, Perfumaria e Cosmeticos (Brazilian Association of the Personal Hygiene, Perfumery and Cosmetics Industry) (ABIHPEC)	www.abihpec.org.br
Africa	Agência Nacional de Vigilância Sanitária (National Health Surveillance Agency) (ANVISA)	http://portal.anvisa.gov.br/wps/portal/anvisa-ingles
	Egyptian Ministry of Industry and Trade	www.mti.gov.eg/english/Pages/default.aspx
Africa	Egypt: General Organization for Export & Import Control (G.O.E.I.C. Egypt)	www.goeic.gov.eg/en/index_R.asp

3.2 Chemical Risk Assessment Dossiers

- www.greenscreenchemicals.org
- www.chemsafetypro.com

3.3 Third Party Test Institutes

Esprit works closely with several international third part laboratories to assure that production complies with Esprit's Minimum Requirements.

The following companies provide regular updates of textile legislation in various regions, NGO activities and any other relevant information related to the textile industry. They also provide technical knowledge of the practical implications of new legislation for the textile supply chain.

SGS	www.sgs.com
International Down and Feather Testing Laboratory (IDFL)	www.idfl.com
Intertek	www.intertek.com
Underwriters Laboratories (UL)	www.ul.com
TÜV Rheinland	http://www.tuv.com/de/deutschland/home.jsp
TÜV SÜD	http://www.tuev-sued.de/home_de
Chinese National Quality Supervision and Inspection Center of Textile Garment and Accessories (GZ) - Guangzhou Fibre Product Testing and Research Institute China (GTT)	http://www.gtt.net.cn/cms/Category.do?method=toEnglishIndex&contentId=105633343457321o24mn9pl14m2n4lp8
Leibniz-Institut für Interaktive Materialien (DWI)	www.dwi.rwth-aachen.de/index.php?id=2
German Textile Research Center North West (DTNW)	www.dtnw.de
PFI Group	http://www.pfi-group.org/top-menu/start.html

3.4 Textile/Brand associations

Esprit is member of several Industry Associations that are an important source of information about legal aspects, technical information, market trends, etc.

Whereas not of the associations and working groups in which Esprit participates have direct relevance for specific hazard screening processes, all of them provide useful information for understanding the changing environment, evaluating potential hazards involved in the production of Esprit goods, or for the end-consumer of Esprit apparel, footwear and accessories.

ACT (on Living Wage)	www.ethicaltrade.org/act-initiative-living-wages
AFIRM	http://afirm-group.com

Bangladesh Accord on Fire and Building Safety	http://bangladeshaccord.org
Better Cotton Initiative (BCI)	http://bettercotton.org
Better Work	http://betterwork.org
BSCI	www.bsci-intl.org
GermanFashion Modeverband Deutschland	www.germanfashion.net
Partnership for Sustainable Textiles	https://www.textilbuendnis.com/en
Sustainable Apparel Coalition	http://apparelcoalition.org
Sustainable Fashion Business Consortium (SFBC)	www.sfbc.org.hk/template
Textile Exchange	http://textileexchange.org
(Zero Discharge of Hazardous Chemicals (ZDHC)	www.roadmaptozero.com

In addition, Esprit also monitors the websites of the following industry associations, of which Esprit currently is not a member:

American Apparel & Footwear Association (AAFA)	https://www.wewear.org
Association of Textile, Apparel & Materials Professionals (AATCC)	www.aatcc.org/
Global Apparel, Footwear and Textile Initiative (GAFTI)	http://www.gafti.org/
Foreign Trade Association of German Retailers (AVE- Außenhandelsvereinigung des Deutschen Einzelhandels e.V.)	http://www.ave-international.de/en.html
Dialog Textil-Bekleidung (Dialog Textile-Apparel)	http://www.dialog-dtb.de
CADS – Cooperation at DSI (Deutsches Deutsches Schuh Institut [German Shoe Institute])	http://www.cads-shoes.com/en/index.html

3.5 NGOs and Media

NGOs and the Media have strong views on the chemical substances or groups of substances that are used in textile production. Their interests are of high importance to meet the demands of the community that is mirrored in the work of NGOs and media.

NGO	Greenpeace	www.greenpeace.org/international/en http://www.greenpeace.de
	Clean Clothes Campaign (CCC)	https://cleanclothes.org www.saubere-kleidung.de
	Canopy	http://canopyplanet.org
	Rainforest Alliance	http://www.rainforest-alliance.org
Media	Öko-Test Magazine	http://www.oekotest.de
	Okoer(Öko Test Chinese Partner)	http://www.okoer.com
	Stiftung Warentest Magazine	http://www.test.de
	Chemical Watch	https://chemicalwatch.com
	Öko-Tex	https://www.oeko-tex.com
	Rückruf-Portal für Deutschland (online platform informing about product recalls of consumer goods)	www.produktrueckrufe.de
	China Labor Bulletin	www.clb.org.hk

3.6 Requirements of Wholesale Customers and End-consumers

The enquiries that Esprit receives from its wholesale customers and from end-consumers provide a useful indication of the concerns of informed customers, end-consumers and society in general. Esprit treats all such enquiries with due urgency.

3.7 Other Sources of Information

- Team Members' personal networks
- technical visits
- conferences, seminars.

4. ANALYSIS AND COMPILATION OF THE RELEVANT INFORMATION ON HAZARDOUS SUBSTANCES

The information derived from these sources is compiled in an internal database under the control and administration of the EMRSC. The relevance of the data is reviewed at least once per month, taking into consideration the following aspects:

- Sales countries for Esprit products
- sales channels
- types of product (apparel, footwear, accessories, kidswear).

This internal database serves as the fundamental basis for decisions on related internal and external actions, which are made by the EMRSC in the regular meetings. These meetings take place at least once per month.

The tools for these internal and external actions are Esprit's Restricted Substances List (RSL) for Apparel, Footwear and Accessories and Esprit's Manufacturing Restricted Substances List (MRSL) for Apparel, Footwear and Accessories. They cover all Esprit products and they are publically available. [include link to website].

The requirements according to the strictest legislation and safety regulation applicable to Esprit products in all sales countries constitutes a fundamental part of the Esprit Restricted Substances List (RSL) for Apparel, Footwear and Accessories, and defines the applicable limits for chemical substances and/or substance groups in the Esprit products. Furthermore, Esprit conscientiously considers information obtained via the above mentioned chemical risk assessment dossiers, because Esprit intends to proactively limit or eliminate hazardous chemicals in order to protect individuals and the environment from any potential hazard.

For a number of chemical substances or substance groups, Esprit has decided on a more advanced, if not aspirational, approach. The basis for such advanced or aspirational approaches is laid by interaction with

- Third party test institutes
- Textile/Brand associations
- NGOs and Media

- Requirements of Wholesale Customers and End-consumers
- People on site in the production countries

The purpose of this advanced or aspirational approach is to follow the most recent trends and interests of a variety of stakeholders with different backgrounds. This means that Esprit continuously strives to ensure not only compliance with applicable legislation, but also to satisfy the requirements of the community when it comes to chemical substances or substance groups, which may not be banned by law, but which the community wants to eliminate from the finished product and from the environment.

In practice, whenever a discussion about chemical substances or substance groups has been initiated, all available sources of information are monitored by the respective specialists in the teams “Quality Management”, “Risk Management” and “Social and Environmental Sustainability” in order to get a full picture of the discussed chemical substance or substance group. A summary of the findings is then presented to the EMRSC. In case the EMRSC intends to restrict the respective chemical substance or substance group, a profound risk assessment is conducted by the Testing Team. The test report is then presented and explained to the EMRSC for final decision.

In case the EMRSC decides on a restriction of the chemical substance or substance group, the respective limits are worked out together with the testing team. After that, these limits are incorporated in the Esprit Manufacturing Restricted Substances List (MRSL), which is updated at least once per year, and which serves as the tool for ensuring that certain chemical substances or substance groups are not used in the production of Esprit products. If necessary, the respective limits are also incorporated in the Esprit RSL.

The Esprit RSL and MRSL are not only publically available on the Esprit website (link), they are also actively shared with Esprit’s suppliers. RSL and MRSL are supplemented by the Esprit Supplier Guidelines, which provide suppliers with detailed information on the nature of Esprit’s RSL and MRSL, as well as recommendations on implementation. These Esprit Supplier Guidelines help Esprit’s suppliers to ensure compliance with the RSL and MRSL.

In addition to this, internal workshops and trainings as well as trainings organized by third parties are offered to Esprit suppliers. These trainings serve as the main basis for direct discussions with and feedback by Esprit suppliers, and they help Esprit to continuously improve the support that is offered to the suppliers by the various means as explained above. Suppliers are encouraged to contact Esprit directly with any questions that they might have with regard to RSL MRSL and related topics.

5. CONTACT

Please direct questions related to this hazard screening methodology to:

sustainability@esprit.com

6. GLOSSARY

EMRSC	Esprit Minimum Requirements Steering Committee
Esprit products	All items sold under the labels "Esprit" and "edc"
MRSL	Manufacturing Restricted Substances List: A list of chemical substances and/or substance groups that are restricted to be used during the production of Esprit products
NGO	Non-governmental organisation
Precautionary Principle	A principle that needs to be followed in order to prevent (potential) harm from people and/or the environment.
RSL	Restricted Substances List: A list of chemical substances and/or substance groups that are restricted to be contained in the final Esprit products