

Joint Action 2013 on GPSD Products, GA N° 2013 82 01
Activity Chemicals in Clothing
NEWSLETTER FOR STAKEHOLDERS
Progress during the Period March 2014 - March 2015

Introduction

How time flies - it has been 12 months since we met for the first Project Meeting of the Chemicals in Clothing project, so this is a good time to update you on progress. The project has a further 12 months to run. It is likely that the final workshop for this, and the other projects involved in Joint Action 2013, will be held in February 2016.

To date there have been four Project Meetings (12 & 13 March 2014; 3 June 2014; 16 September 2014 and 3 December 2014). The first sessions of the March and June meetings were 'open' meetings at which both the participating Member States and stakeholders were invited to attend. The other meetings were 'closed' sessions. The fifth and final project meeting will be held in Brussels on 21 April 2015.

The First Two Project Meetings

The main focus of these meetings was to resolve:

- Which categories of consumers are most at risk from hazardous substances in clothing;
- Which types of clothing should be collected by the participating Member States (Latvia, Malta, Portugal, Slovakia, Spain and The Netherlands) during the course of the market surveillance activity;
- The legislation relating to the hazardous substances and which of the substances referenced in the legislation are likely to be found in the clothing collected during the market surveillance exercise;
- When the market surveillance activities should be conducted and how many samples of each type of garment should be collected from the market place;
- How we should proceed regarding the call for tender to laboratories for the testing of the items collected from the marketplace and how we should select the test lab that would undertake the testing on behalf of PROSAFE.

Members noted that during the course of the project new legislation concerning the requirements for Chromium VI would come into force and that this would need to be taken into account when deciding on the testing regime.

At this time the external stakeholders were asked to advise on the types of clothing they thought would be appropriate to include within the market surveillance exercise and which potentially hazardous substances are most frequently found in these types of clothing. This information proved to be very useful when deciding on which hazardous substances in clothing should be subject to testing as it was based on the stakeholders' recent experience of the products that are currently on the market. The Project Group also reviewed the RAPEX notifications relating to chemicals in clothing.

By the close of the second Project Meeting members had agreed:

- That the categories of consumer most likely to be at risk from the presence of hazardous substances in clothing are young children and pregnant women. In the case of young children, it was acknowledged that their skin is more sensitive to chemicals than the one of adults and that, as they usually have a more

restricted range of clothes, they tend to wear them for long periods. A similar situation also applies to pregnant women. It was acquiesced that their skin is likely to change during pregnancy and that, again, they are likely to wear the same types of clothing for a prolonged period of time.

- That the following types of products should be collected from the marketplace together with the hazardous substances to be tested for each product and the timetable for the collection of the products from the marketplace, viz.:

<i>Type of clothing & hazardous substances for which they would be tested</i>	<i>Collected during</i>
Children's nightwear - Azo dyes; Formaldehyde; Organotins; Phthalates	Summer 2014; Winter 2014/15
Children's plastic shoes/flip-flops - Azo dyes; Cadmium; Lead; Phthalates	Summer 2014
Children's swimwear - Azo dyes; Cadmium; Formaldehyde; Lead	Summer 2014
Children's underwear - Azo dyes; Formaldehyde; Organotins; Phthalates	Summer 2014 & Winter 2014/15
Unlined leather gloves for use by adults or children - Chromium VI;	Winter 2014/15
Total metal content	
Sportswear for use by children sold by specialist shops - Azo dyes;	Summer 2014; Winter 2014/15
Cadmium; Lead; Organotins; Phthalates	
Trousers with an elasticated belt for use	Winter 2014/15
by pregnant women - Azo dyes; Formaldehyde; Organotins	

That the test labs that have been approved as notified bodies under the provisions of the toy directive (2009/48/EC) and four specialist test labs in the clothing sector be invited to submit a tender for the testing of the items collected during the course of the market surveillance exercise. Using the costs from testing of potentially hazardous substances for the JA 2010 - Children's Fancy Dress it was agreed that it should be possible to use the testing budget to test about 150 products from the Summer 2014 and a further 150 products from the winter 2014/15 market surveillance exercise.

Finally, a timetable for the conduct of the tendering process and the selection of the preferred test lab was agreed, together with a schedule for the collection of samples during the summer 2014 and the testing of these products.

The Third Project Meeting

Each Member State outlined the progress they had made in relation to the collection of samples during the summer 2014. Members also reviewed the testing programme for the winter 2014/15 market surveillance exercise.

The Project Group also received details of the tendering process, noted the procedures for the review of the tenders and for the final selection of the preferred test lab, viz. The Technological Institute for Children's Products and Leisure (AIJU), Ibi, Alicante, Spain. AIJU were one of the four labs, referred to above, that specialise in the testing of clothing. It was also agreed that Linda Rinkule and Robert Chantry-Price should visit AIJU in late September to meet the staff who would be involved in the testing our products, to see their testing facilities, to discuss the content of the contract with the lab and to discuss the timetable for the delivery of samples to the lab, the testing of the products by the lab and the arrangements for the reporting of the results.

The Fourth Project Meeting

AIJU gave a presentation concerning the test reports relating to the samples collected during the market surveillance exercise conducted during the summer 2014.

A total of 153 samples had been collected by the participating Member States on which a total of 771 tests had been conducted. A more detailed breakdown of the tests conducted on the samples is given below

COUNTRY	Total test reports	Azodyes	Formaldehyde	Total Pb/Cd	Organotin compounds	Phthalates	EN 71-3:2013
<i>NETHERLANDS</i>	27	26	26	14	32	14	6
<i>SLOVAK REPUBLIC</i>	25	21	21	30	6	17	8
<i>MALTA</i>	28	32	30	23	38	29	10
<i>SPAIN</i>	24	32	17	21	41	25	19
<i>LATVIA</i>	25	21	21	26	28	20	8
<i>PORTUGAL</i>	24	24	22	19	17	19	8
TOTAL	153	156	137	133	162	124	59

A total of 19 products were non-conforming. The principal non-conformities were in relation to azo dyes (2 products); phthalates (17 products) and cadmium (1 product - which also had a non conformity in relation to phthalates). No samples had failed the requirement for their formaldehyde content, or for their organotin content. No samples had failed to meet the requirements for the various heavy metals listed in EN 71-3, but a number of samples had shown a higher than expected level of certain elements (e.g. aluminium and zinc) and tins, although the quantities present were considerably below the maximum level for non-conformity specified in EN 71-3 or the toy directive.

The samples had been tested to the following standards:

EN 14362-1 & -3:2012 - Textiles. Method for the determination of certain aromatic amines derived from azo colourants;

EN ISO 14184-1:2011 Textiles. Determination of formaldehyde. Free & hydrolysed formaldehyde (water extraction method);

Organotin compounds: an AIJU internal test procedure;

CPSC-CH-C1001.09.3 Standard operating procedure for determination of phthalates;

CPSC-CH-E1002-08.3: Total lead and total cadmium;

Screening of elements: EN 71-3:2013.

It was agreed that each participating Member State would attempt to obtain a total of 25 samples from their markets during the course of the winter 2014/15. Members would be free to collect as many samples as they wished from each of the five types of clothing listed above, except in the case of Trousers - for use by pregnant women and Unlined leather gloves, when a total of 5 ± 2 products should be collected from each category.

The Final Project Meeting

This will be held on 21 April in Brussels.

During the winter, a total of 149 samples were collected from the premises of economic operators. They are currently being assessed for the presence of the hazardous substances listed above by AIJU. The results of the testing by the lab will be reported to the meeting on 21 April.

The various types of article collected during the course of the market surveillance exercise were: Children's nightwear - 28; Children's shoes - 24; Children's sportswear - 5; Children's underwear - 27; Leather items - 36; Trousers used by pregnant women - 29.