
ZDHC MRSL

Conformance

Frequently

Asked

Questions

(FAQ)

Ø ZDHC

The Zero Discharge of
Hazardous Chemicals Programme

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Who

1. Who gets the certificate that can be used to demonstrate MRSL conformance - the mill or the chemical supplier?

The chemical supplier applies for and obtains the certificate for their products.

What

2. What is the MRSL?

The Manufactured Restricted Substances List - short MRSL - is a list of chemical substances banned from intentional use in facilities that process textile materials and trim parts in apparel, leather and footwear. The intent of the MRSL is to manage the input of chemicals to the suppliers and remove those hazardous substances from the manufacturing process.

3. What does MRSL Conformance mean?

MRSL conformance means that the chemical formulation does not contain any of the MRSL chemical substances above the limits in the ZDHC MRSL.

4. What conformance level is full formulation review?

A full formulation review means that the chemical supplier has confidentially shared their full chemical formulation recipe with a third-party. In the absence of any review of the chemical suppliers product stewardship practices this is a Level 1 conformance indicator.

5. What are the levels of conformance?

The levels of conformance are related to the confidence that any specific batch of the chemical formulation will meet the MRSL requirements. Higher levels of conformance mean that there is increasingly more known about the chemical formulation and the environmental health and safety practices of the chemical supplier.

6. What is the difference between getting a laboratory test certification for the ZDHC MRSL and having a hazard chemical screening review for ZDHC MRSL compliance?

Laboratory testing from an independent third-party provides a test report that shows whether chemical substances on the ZDHC MRSL were detected in the chemical formulation. A hazardous chemical screening review means that a third-party review of the chemical formulation information supplied to them by the chemical manufacturer indicated the formulation met the requirements of the ZDHC MRSL. Both are considered to be Level 1 conforming.

7. What does the chemical supplier have to upload to the ZDHC Gateway - Chemical Module to show ZDHC MRSL conformance?

Depending on the conformance level it may be a self-declaration (Level 0), a test report or third-party documentation review (Level 1), a Level 2 which includes a review of the formulation and documentation review of the chemical supplier's product stewardship or a Level 3 review which requires a supplier site visit as a part of the product stewardship review.

When

8. When will the ZDHC Gateway - Chemical Module be publicly available?

The ZDHC Gateway - Chemical Module is available to ZDHC contributors from May 2017 and will be available outside ZDHC contributors on a pay-to-play basis at the end of 2017.

Where

9. Where can I find laboratories to analyse chemical formulations to show they meet the ZDHC MRSL requirements?

ZDHC cannot endorse or recommend specific laboratories by name. Please contact your brand or the laboratory that performs RSL tests for you for laboratory references.

Why

10. Why can't a chemical company re-register a chemical formulation using a self-declaration?

The ZDHC Programme believes that any self-declaration should ultimately require verification and certification by a third-party. Understanding that there is a period of transition, we allow a self-declaration to be valid for the first 24 months, thus providing time for third-party verification to be put into place.

11. Why do I still need to do RSL testing if all my chemicals meet the MRSL limits?

RSL product checking is required both because some RSL chemicals are restricted but their use is not (e.g. formaldehyde) and in some cases a report is legally required.

How

12. How can I demonstrate conformance to the ZDHC MRSL?

See the ZDHC MRSL conformance guidance for a description of the requirements.

13. How do I find Certification Bodies?

The accepted certification bodies are listed on the ZDHC Gateway - Chemical Module.

14. I have a certification but the third-party is not on the ZDHC approved list - how do they get on the list?

All certification bodies that perform reviews of chemical formulations for ZDHC MRSL conformance are eligible to apply for acceptance, please contact roadmap@zdhc.org

15. How much does it cost to register on the ZDHC Gateway - Chemical Module?

There are three options for Chemical Manufacturers and Formulators. The Basic Subscription, the Pro Subscription and the Enterprise Subscription, for more information please contact gateway@zdhc.org.

16. How much does it cost to get a chemical certified?

Please contact the third-party certifier for this information.

17. How do I know what analysis to perform on a chemical formulation to demonstrate MRSL conformance?

The ZDHC MRSL conformance guidance Annex A Table 1 lists the recommended analytical tests to be performed for each functional type of chemical formulations.

18. How does using a toxicologist to screen chemical formulations for hazards support ZDHC MRSL Conformance?

Third-party hazard screening programmes typically involve review of the chemical recipe against restricted chemicals lists such as the ZDHC MRSL or require the chemical supplier to disclose the presence of any chemical substances on restricted lists. If the hazard screening approach includes a check for chemical substances on the ZDHC MRSL then the process could be used to show MRSL conformance if the certifier is accepted by ZDHC.

19. How can chemical suppliers upload a document that will change the conformance Level in the system? For example, if a chemical manufacturer uploads an acceptable test report or an acceptable third-party certificate will the system change the rating of the formulation automatically from self-certification?

Yes, the system will automatically update the conformance rating when a new qualifying document is uploaded after it goes through a verification process.

20. Does a chemical formulation need to receive a certificate at each level before getting one at the next level?

No, a chemical formulation certification only needs to be obtained at the desired level.

21. Does Registration mean my products conform to ZDHC MRSL requirements?

No. Chemical supplier and/or formulation registration do not mean that the products meet the ZDHC MRSL requirements. It only means that they have provided information about the company and their products.

22. Does ZDHC certify chemical formulations?

No. ZDHC does not certify chemical formulations. The Foundation only reviews information on certification bodies to grant acceptance of those certifications for ZDHC MRSL conformance checks.

23. Do all conforming chemicals on the ZDHC Gateway - Chemical Module meet product performance standards?

MRSL conformance is only a check for the presence of MRSL chemicals. There is no implied performance of the chemical formulation for its intended function.

24. Does ZDHC issue a certificate of compliance for chemical formulations meeting ZDHC's MRSL?

No. ZDHC does not certify chemical formulations. The Foundation only reviews information on certification bodies to grant acceptance of those certifications for ZDHC MRSL conformance checks.