

Interim Guidance for ZDHC MRSL Conformance

The ZDHC Programme has agreed to a common set of limits for banned chemicals in the chemical formulations used for apparel and footwear production. The goal is to prevent these banned chemicals from entering the supply chain. Chemical limits are found in the ZDHC Manufacturing Restricted Substances List (MRSL) stored at <http://www.roadmaptozero.com/programme-tools/>

This interim guidance will help brands and suppliers judge their confidence in whether a perceived MRSL compliant formulation from a supplier actually meets the requirements of the ZDHC MRSL standard.

Chemicals management starts with a purchase from a supplier who can show that they are producing and delivering chemical formulations of acceptable quality. A quality formulation means that it does not contain banned chemicals and it meets your performance requirements to make a formulation that meets your customer's standard.

It will save time and money if you ask your chemical supplier to demonstrate that their formulations meet the ZDHC MRSL requirements. Brands and suppliers should ask their chemical suppliers for the following information to show that a chemical formulation is MRSL compliant. More detailed guidance will be developed by the ZDHC Programme in the future.

- 1. Safety Data Sheet (SDS)** – Chemical suppliers should ALWAYS supply a current SDS for each chemical formulation whether or not claims about its MRSL compliance are made. Review the SDS for chemicals listed in the MRSL. (Note: Chemical substances listed on the MRSL may still be present at levels below those reported on a SDS, so this does not completely assure MRSL compliance.)
- 2. Third Party Testing or Third Party Certification** – A test report and/or certificate from a third party testing laboratory or recognised certification body can be evidence that the chemical formulation complies with the MRSL. (For example, the Global Organic Textile Standard's approved formulations cannot contain alkylphenol ethoxylates). Third party testing is generally unnecessary if the formulation already has been assessed and certified by a credible third party organisation. Testing or certification should be traceable to the formulation supplied.
- 3. Supplier's Declaration of MRSL Conformity (first party)** – Where the chemical supplier has self-declared MRSL conformity, but does not supply third party testing or third party certification to support the declaration, ask for evidence that they manufacture according to ISO standards for quality management systems or environmental management systems and have committed to the Responsible Care® initiative (e.g., via membership to a trade association committed to the initiative; information at <http://www.icca-chem.org/en/Home/Responsible-care/>). This declaration of conformance should be traceable to the formulation supplied and should include the suppliers contact information, a unique formulation/batch identification, a statement of what the formulation conforms to, and a clear indication of the limitations of this conformance declaration.