

# Public consultation on a possible restriction of hazardous substances (CMR 1A and 1B) in textile articles and clothing for consumer use under Article 68(2) of Regulation EC No 1907/2006 (REACH)

Fields marked with \* are mandatory.

## 1. Respondent's information

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\* 1.1. Your full name:

\* 1.2. Your e-mail address for correspondence:

\* 1.3. I'm replying:

- a. As an individual citizen
- b. On behalf of an organisation (including any association, authority, company or body)

\* 1.3.b.1 If replying on behalf of an organisation, please provide the name:

\* 1.3.b.2. Is your organisation listed in the EU transparency register?

- a. Yes
- b. No
- c. Do not know

\* 1.3.b.2.a. Please specify identification number:

\* 1.3.b.3. Please specify the organisation you represent:

- i. Public authority
- ii. Private company
- iii. Non-Governmental Organisation
- iv. Trade union
- v. Industrial or trade association
- vi. Academic/Research institution
- vii. Other

\* 1.4. Your country:

\* 1.5 Do you agree to the publication of all information on your contribution:

- a. Yes (I consent to the publication of all the information in my contribution, and I declare that none of it is subject to copyright restrictions that would prevent publication)
- b. No (your contribution will not be published and its content may be used internally within the Commission. In any case, the contribution will be subject to the rules on access to documents, Regulation (EC) No 1049/2001)

1.5.a.1 Under what name do you want your contribution to be published? (  
if anonymously, leave it empty)

## 2. The definition of the articles covered by the possible restriction

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The possible restriction aims to cover the following articles intended for consumer use:

- Articles that consist of at least 80% of textile fibres by weight, or
- Articles that contain a part that consists of at least 80% of textile fibres by weight.

This covers raw, unfinished, semi-finished and finished goods, whether or not coated or laminated, including articles such as clothing, footwear, accessories, interior textiles, fibres, yarn, fabrics and knitted panels.

Examples of articles intended to be covered:

- Underwear, nightwear, swimwear, garments, scarfs, ties, handkerchiefs, hats, gloves, socks, footwear;
- Footwear, clothing or their parts and accessories made of synthetic/artificial leather;
- Footwear, clothing or their parts and accessories made of artificial furs or hides;
- Interior articles such as hangings and curtains, carpets and other floor coverings, table mats, table cloths, towels, bed linen, pillow cases.

Articles excluded from the possible restriction:

- Footwear, clothing or their parts and accessories made of real leather;
- Footwear, clothing or their parts and accessories made of natural furs or hides;
- Toys.

2.1 Is it clear which articles are covered by the possible restriction?

Please justify your reply.

- a. Yes
- b. No

Justification and suggestions:

2.2. Do you think that the range of articles covered by the possible restriction is appropriate?

Please justify your reply.

- a. Yes
- b. No

Justification and suggestions:

### 3. Comments on specific CMR substances

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In this section, you can provide comments on the specific substances that can be present in the articles proposed to be covered in the possible restriction. You can download:

- The preliminary lists of CMR substances Category 1A or 1B that may be present in textile articles and clothing for consumer use

[List of CMR substances - Classified dyes and carcinogenic amines.pdf](#)

[List of CMR substances - Petroleum and coal stream substances.pdf](#)

[List of CMR substances - Other substances .pdf](#)

- An explanatory note on how the list was derived

[List of CMR substances - Background.pdf](#)

Please provide your responses/comments to the questions below by filling in the attached table, adding new rows if needed. If the substances on which you want to comment are present in the preliminary list of substances, please use the same identifiers (CAS/EC number). If you propose to add substances to the list, please specify the identifiers and, if known or available, the function and the concentration limit.

**Please download the table for your responses from here:**

[Table - PC REACH CMRs textiles.docx](#)

**To submit your responses, please upload your table from here:**

Your file

### Substances in the list

3.1 Are there any substances in the list that are not present in the articles covered by the possible restriction?

- If you are aware of such substances, please list the relevant ones and provide a justification why it is not likely they would be present (e.g. description of the production process that is used or known to be used).

3.2 Do you have comments on the function of the substances as presented in the list, or additional information on their function in the articles covered by the possible restriction?

3.3 Are there any substances on the list for which you have evidence that they do not cause dermal or inhalation exposure of consumers during normal or foreseeable use? ("Normal or foreseeable use" includes wearing the clothes or children mouthing parts of the clothing)

- If yes, please provide relevant evidence to support this.

3.4 Do you have any evidence of an increasing or decreasing trend of the market and use inside or outside of the EU for any of the listed substances? Please provide the evidence or a summary of it, including the name of the country.

#### Substances you may propose to be added to the list

3.5 Are there any CMR substances Category 1A or 1B not mentioned in the list, for which you have evidence of the presence in the articles covered by the possible restriction?

- If you are aware of such substances, please provide the name and identifiers of the substance(s) (such as CAS or EC number) and evidence for their presence (e.g. available test results or knowledge/description of the production process used requiring the use of that substance).
- If known or available, please specify the function in the article and possible concentration limits.

3.6 Do you have any evidence of an increasing or decreasing trend of the market and use inside or outside of the EU of the substances you propose to add to the list? Please provide the evidence or a summary of it, including the name of the country.

#### All substances

3.7 Do you have evidence of the presence of any specific CMR substances Category 1A or 1B no longer used in the EU in textile articles or clothing, but potentially present in such articles that are imported from third countries?

- If yes, please provide the name and identifiers of the substance(s), such as CAS or EC number) and any relevant evidence to support this.

3.8 Do you have information on the presence of the listed CMR substances and other CMR substances Category 1A and 1B in non-textile (parts of) articles such as:

a) Non-fibre elements of clothing and accessories that are incorporated to the clothing article, including zips, buttons, decorative elements?

b) Clothing or its parts made of a non-textile material other than leather, furs and hides (e.g. plastic or plasticised materials)?

3.9 Are there any cases where the limit set out in the list of substances could not be met (e.g. due to the production process for a specific article, specific function of the substance in that article, the absence of a suitable alternative etc.)?

- If yes, please provide technical and/or economical justifications. Please be specific by indicating the substance, the type of article and considerations of alternatives.

3.10 Do you have information on the availability of analytical methods and other means to verify and/or prove compliance with the possible restriction (e.g. manufacturer declaration, quality assurance systems,...)?

- If yes, please provide details about those methods or measures. In the case of analytical methods, please be specific by indicating the limits of detection for specific substances and whether they are recognised by international standards.

3.11 Do you have information on the possible impact (cost-effectiveness and benefits) of the possible restriction (quantitative or qualitative)? Please be specific, referring to substance/group of substances.

- If applicable, consider also the need of an exemption for recycling of textile articles already on the market before the enter into force of the possible restriction.

## 4. General comments

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Please submit any general comment you might have on the intended restriction.