REACH Regulation: understand the basic principles. p. 6
For over 100 years, CTC has been providing clients with leather goods, footwear and clothing expertise. Be it for an SME with refined expertise or a multinational manufacturing company (industrial, brand or distributor), the globalisation of business relations and rapidly increasing pace of international trade mean companies must have complete control over their sourcing and logistics flow.

Assuming even further corporate social, societal and environmental responsibility within the context of these business relations is more important than ever.

Another key point in our clients’ development is information access and control, especially in terms of regulations. To achieve this, CTC relies on its experts. This network is constantly monitoring the international situation and maintains a dual presence in the countries where the product is consumed and where it is produced. Such surveillance not only gives in-depth insight into market expectations and restraints, but also sheds light on production difficulties.

To help you meet these market expectations, this edition contains:
- CTC's latest developments to help you improve your performance;
- information on regulatory and technological developments (REACh and certification of personal protective equipment);
- access routes to this information (CTC seminar and training).

We are always here to help. Please don’t hesitate to share your comments or suggestions regarding this publication.

Enjoy reading, and thank you for your support.
 Awareness of the importance of sustainability has increased substantially over the last few years. As a result, companies are embracing sustainable practices and using them to differentiate themselves. For CTC, this represents a key element in our development and will allow us to strengthen our specialization in the Fashion Industry and in Sustainability.

Market

**EU and Vietnam:** a Free Trade Agreement!

After two and a half years of negotiations, the European Union and the Socialist Republic of Vietnam have reached an agreement in principle for a free trade agreement (FTA). This agreement will remove nearly all tariffs on goods traded between the two economies and “will boost trade with one of Asia’s most dynamic economies” EU Trade Commissioner Cecilia Malmström said.

**Appointment**

**André Leroy,** a new Sales Director & CSR Officer

André LEROY has been appointed Sales Director for CTC Greater China and Corporate Social Responsibility for CTC Groupe. Previously Global Compliance Program Manager for Avery Dennison and former Manager of international laboratories, André has a strong experience and knowledge in the Apparel Industry, Sustainability and Testing Services. For Yves MORIN, CEO of CTC, “André’s arrival represents a key element in CTC’s development and will allow to strengthen its specialization in Fashion Industry and Sustainable Development”. André LEROY is based in Hong Kong.

**Accreditation**

**Sustainability:**

CTC’s experts accredited by SAC

The SAC, Sustainable Apparel Coalition has accredited CTC’s experts in Europe, China and India, as official “SAC Verifiers”. They can now help companies to determine the sustainability of their suppliers and factories. SAC is the largest trade organization of brands, retailers, manufacturers, government, non-governmental organizations and academic experts.

This team is driven by André Leroy, CSR Officer of CTC Groupe and Sales Director for Greater China. He said: “SAC standard is a great move for the apparel and footwear industry: it gives the opportunity to go to a unique standard. With this standard, the industry will give in the future the consumers the tools to make their final choice. This first move will meet companies growing needs to assess the sustainability of their supply chains and CTC’s SAC Verifiers are in well positioned to bring them their expertise to assess supply chain sustainability”.

**Development**

**CTC India:** strengthening its position in PPE

CTC India reinforced its position in the Personal Protective Equipment industry with the development of the testing services for protective gloves and safety footwear. As CTC extended the certifications for Russia, South Africa and Malaysia markets, CTC India is ready to carry out physical testing to obtain official certification for each country.

Note that a new inspection area is available at Calcutta.

**Congress**

**UITIC’s Call for Papers is launched!**

The Council for Leather Exports (CLE) India will organize the 19th Congress of the UITIC (International Union of Shoe Industry Technicians) during February 3rd to 5th 2016 in Chennai, India. Brands, footwear manufacturers and experts will join together to discuss the Future of the Footwear Factory as well as innovations in the footwear Industry. Two categories of presentation will be proposed: 20 min spoken presentation and visual presentation with a poster. Authors have until September 30, 2015 to submit their paper with the Abstract Submission Yves MORIN, CEO of CTC, is the President of UITIC since 2010.

Form available at http://uitic-congress.cleindia.org

**Obituary**

**Roland Steyns** has passed away

It is with great sadness that we announce the passing of Roland STEYNS. Roland was a quiet, efficient, courteous and pleasant man, always available for clients and colleagues.

As a skilled professional, Roland has developed a strong understanding of the footwear global supply markets, within both Fashion and Sport Industries.

He strongly contributed to the set-up of CTC Dongguan in 2007 (China) and Roland left CTC with fond memories of him. We all regret him and our condolences go out to his family and friends.

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**www.ctcgroupe.com**
The REACh regulation came into force in June 2007. Year after year, “REACh” constraints have been taken into account in the RSLs (Restricted Substances Lists) of major brands for footwear, leather goods or clothing. However, interpretations of the regulation are sometimes surprising. For this reason, the CTC Department of Sustainable Development and Corporate Social Responsibility wishes to clarify a few points regarding the main principles of this founding legislation.

Under the European REACh regulation, a pair of shoes, a leather item or a pair of gloves are articles. Materials required for the manufacturing of these finished articles are also articles (leather, textiles, polymers or metal fittings). Any article placed on the European market must comply with the general product safety requirement laid down in Directive 2001/95/EC. The REACh regulation supplements this general requirement by regulating the use of chemical substances.

Substances Subject to Restriction
Some chemical substances associated with a material (e.g. a textile), a type of article (e.g. a childcare article) or with the guidelines for use (e.g. articles that come into contact with the skin) must not exceed the regulatory threshold limits. For example, carcinogenic aromatic amines must have a concentration of less than 30 mg/kg in any leather and textile parts that may come into direct and prolonged contact with the skin. For hexavalent chromium, the limit is set at 3 mg/kg for leather articles that may come into contact with the skin, either directly or indirectly, and regardless of the duration of this contact. These thresholds are published in Annex XVII of the REACh regulation which specifies the restrictions imposed on the manufacture, placing on the market and use of certain dangerous substances. Annex XVII is not specific to the leather, footwear, leather goods and glove industries and includes requirements targeting other sectors or types of articles. Overall, there are about twenty restrictions which must be taken into account for apparel and footwear. If the concentration of the substance in the article to which the restriction applies exceeds the threshold limit in Annex XVII, the article can not be placed on the European market, whether it was manufactured in or outside the European Union.

Other European legislation imposes restrictions on the presence of chemical substances in articles. For example, Regulation no. 850/2004 on persistent organic pollutants (the so-called “POP Regulation”). Some Member States also have specific national restrictions (e.g. the restriction of lead in articles in Denmark).

Substances of Very High Concern
The REACh regulation imposes specific requirements on substances identified as being of very high concern (such substances are referred to as SVHC which stands for “Substances of Very High Concern”). These are substances that meet at least one of the following criteria:
- carcinogenic, mutagenic or toxic for reproduction category 1A or 1B (CMR);
- persistent, bio-accumulative and toxic;
- very persistent and very bio-accumulative;
- substances for which there is scientific evidence of probable serious effects to human health or the environment, for example, endocrine disruptors.

The objective of the European Union is to ban these SVHCs by listing them in Annex XIV of the REACh regulation. REACh has two very distinct requirements relating to these SVHCs which are detailed in what follows:
- a duty to communicate;
- a ban on use in Europe.

Duty to communicate
On the basis of a proposal from a Member State, a substance can be officially identified as a SVHC. It is then added to the candidate list of substances of very high concern (the so-called “Candidate List”) for eventual inclusion in Annex XIV of the REACh Regulation. To date, 163 substances have been identified as being of very high concern. This candidate list is updated every six months, with the aim being to have a definitive list by 2020. These SVHC candidates are not banned. However, if the SVHC is present in the article at a concentration of more than 0.1% (=1,000 mg/kg), the supplier is obliged to inform his customers of the presence of this substance.
This duty to communicate applies to all the actors in the supply chain. However, the rule is different when selling to an end consumer: communication is obligatory only if requested by the consumer and the supplier must respond within 45 days.

**Ban on use in Europe**
The European Chemicals Agency (ECHA) periodically reviews the SVHC substances on the candidate list to determine those that should be banned as a priority via their inclusion Annex XIV of the REACh Regulation. To date, of the 163 substances identified as SVHCs, 31 are included in Annex XIV, entitled “list of substances subject to authorisation”.

The principle of this annex is: chemical substances listed in Annex XIV are not allowed to be manufactured, imported or used on European territory unless an authorisation (temporary exemption) has been granted. The date of the ban does not correspond to the date the substance was added to Annex XIV; instead, it is determined for each substance in order to give the industries affected time to organise themselves. As a result of the ban on the use of substances in Annex XIV in Europe, it follows that articles produced on European territory would not contain these substances. However, articles manufactured outside of the European Union and placed on the European market may contain these same substances; they will therefore be subject to the duty to communicate described above, insofar as these substances are SVHCs. To overcome this, the REACh regulation provides for the possibility of including a restriction in Annex XVII on substances listed in Annex XIV if the risk posed by the imported articles containing one of these substances is not properly controlled.

**CONCLUSION**
The basic principles of the REACh regulation have been presented in a simplified way by sorting the chemical substances into three types of requirements for those placing articles on the market: restriction, communication, ban. In practice, the same substance can be restricted under Annex XVII, appear on the list of SVHCs and be included in Annex XIV. This is the case, for example, with phthalate DEHP, making it difficult for manufacturers to understand.

The CTC Department of Sustainable Development and Corporate Social Responsibility carries out a watch specifically for manufacturers in the leather, footwear, leather goods and glove industries to help them make sense of the requirements and overcome their practical consequences in business.
CTC’s PPE worldwide services

CTC’s PPE Worldwide services in footwear and glove certification have now been extended to Russia (former GOST standards), South Africa and Malaysia. Companies targeting these countries are now able to carry out physical testing at CTC France, India or China prior to obtaining official certification for each country.

CTC’S OFFER FOR MOTORCYCLE RIDERS
CTC provides physical and chemical testing for protective clothing including jackets, gloves, boots and trousers intended for motorcycle riders. These tests are provided in accordance with various standards: for protective gloves, tests respond to EN 13594. For footwear, tests are performed according to EN 13634. Eventually, EN 13595-1 is the standard that applies to protective clothing.

CHANGES TO PROTECTIVE GLOVE STANDARDS
Evolution of standard EN 13594 for motorcyclists’ protective gloves
In the new standard prEN 13594 project, some compulsory requirements don’t change: pH value (leather and fabrics), Chromium VI content (leather), inclusion of hard elements, cuff length, cutting resistance (≥1.2).
The changes to standard EN 13594 that applies to protective gloves for motorcycle riders affect two aspects: test methods are improved and the level of requirement become lower. The main changes concerning the compulsory requirements are:
- Suppression of the colour fastness to perspiration test
- Ergonomic requirements (new questionnaire of the prEN13594)
- Size
- Maintain (new cones): dynamometer, test tube for finished products, muff inserted in glove.
- Tear strength (on cuff materials): dynamometer, materials sample, tests according to EN ISO 3377-1 for leather and EN ISO 4674-1 for the other materials, recording of the strength linked to tear strength resistance.
- Seams resistance (requirements seams range ≥ 4N/mm)
- Resistance to impact abrasion (mean abrasion time ≥4.0s, single abrasion time ≥3.0s) + (according to the method of the prEN13594): standard EN13595-2, specific equipment, materials sample. The sample is carried up on an articulated arm. This arm pivots and makes the sample touch an abrasive strip. We measure the time needed to obtain a hole.
Regarding the additional requirements, changes concern additional protection, mitigation of the impact energy (average ≤7kN, single value ≤9kN) + (according to the method of the prEN13594).

The evolution of standard EN 13594 also includes a new marking and new instructions.

Regarding general requirements about innocuousness, protective gloves for motorcycle riders must comply with the PPE directives requirements and the European regulation (REACH). Personal Protective Equipment must not be dangerous for users. Moreover, requirements depend on materials (leather or fabrics) and their colour. These requirements concern azoic dyes (all materials), PFOS/PFOA (any non-elastomeric material treated for water), Organotins (on a principal material), cadmium, nickel (metallic elements in contact with the skin).

Evolution of standard EN 388 for protective gloves
Regarding the standard for protective gloves against mechanical risks, the significant changes are:
- The application to cuff materials
- The improvement of the abrasion resistance test
- The improvement of the cutting resistance test
- Test and optional requirements for protection against shocks

The standard EN 374-1 related to protective gloves against chemicals and micro-organisms also evolves:
- 3 types of gloves A-B-C
- New permeation resistance test
- New list of substances
- New marking (pictogram)
- Test on cuff material
- Inclusion of resistance to chemical degradation test

Among the other changes, the test method of the EN 374-2 is improved and the EN374-3 is replaced by prEN16523-1. A new permeation resistance test (cell clarification, temperature, detection...) is established.

SUSTAINABILITY
www.aclechina.com

How to demonstrate sustainability of your factories while minimizing costs
A sustainability standard adopted by Brands that represent 1/3 of the apparel and footwear market worldwide that minimize duplication of assessments
Date: Monday, 31 August 2015
Time: 13:30 - 14:30
Venue: Room E2 - M20, Shanghai New International Expo Centre (SNIEC)
Speaker: André LEROY, Sales Director - Sustainability Officer, CTC Greater China
Language: presented in both English and Chinese
Contact: Liya Ji - Marketing Executive - CTC China
lji@ctcgroupe.com (+86) 136 1194 9193

PERSONAL PROTECTIVE EQUIPMENT

Safety Footwear and Gloves latest regulation and technical guideline
These seminars will focus on standardization and testing for Safety Footwear and Gloves.

Safety Footwear
Date: Wednesday, 26 August 2015
Location: Wenzhou

Safety Gloves
Date: Thursday, 24 September 2015
Location: Gaomi

Safety Footwear
Date: Thursday, 24 September 2015
Location: Gaomi

Safety Footwear
Date: Friday, 25 September 2015
Location: Yinan

Safety Footwear
Date: Friday, 20 November 2015
Location: Dongguan

Speaker: Kevin LEE - PPE Supervisor - CTC Dongguan
Language: presented in both English and Chinese
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FUTURE FOOTWEAR FACTORY
19th INTERNATIONAL TECHNICAL FOOTWEAR CONGRESS
February 03-05, 2016
Chennai, INDIA
Website: http://uitic-congress.cleindia.org

Venue:
Hotel ITC Grand Chola
Chennai

Organizer:
Council for Leather Exports India
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Event Official:
UITIC
International Union of Shoe Industry Technicians