

 ASSOCIATION POUR L'ASSURANCE QUALITÉ DES FABRICANTS DE BRACELETS CUIR		DOC nb	LIS001_12
		Replace	LIS001_11
RESTRICTED SUBSTANCES LIST FOR LEATHER			
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Written by	Quality review (signature/date)	Process owner (signature/date)	
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Change log

Version	Date	Modification
10	19Oct20	Revision: - REACH restriction proposal for allergens in leather in contact with skin: <ul style="list-style-type: none"> o Addition of allergenic disperse dyes (for information) including navy blue dye (1000 mg/kg) o Cobalt and Nickel: from total (ISO 17072-2) to extractible (ISO 17072-1) - Addition of DBB in organo-tins
11	01Sep21	Revision: - New entry in SVHC list: Transfer of Glutaraldehyde from metal free option to standard testing pack - New entry of SVHC list: limit for MCCP from "for information" to "1'000 mg/kg" and precision of CAS numbers related to this group of substances - New entry in SVHC list : Addition Bisphenol B with a limit of 1'000 mg/kg. Bisphenols A is also added with a limit of 1'000 mg/kg (SVHC) and Bisphenols AF, F and S added "for information" to prepare the potential REACH restriction for bisphenols. - Addition of 2-Methoxyethanol (SVHC) CAS No.109-86-4 - New REACH annex XVII for C9-C14 PFCAs (entry 68) - Suppression of disperse dyes and navy blue
12	21Mar22	Revision – Decision TWG by mail 16Mar22 - Suppression of reference to old annexes A and B of EU POP regulation (before recast in 2019) - Alkylphenols: precision of isononylphenol within the 4-nonylphenol, branched and linear family - PFOA: integration in EU POP Annex I – deleted from Annex XVII entry 62 - Complete revue of all Per- and polyfluoroalkyl substances (PFAS) - PAHs: update of method version - PAHs: table for anthracene limit calculation replaced by a comment - Metals: addition of Antimony – limit : for information (future Chinese regulation for watch straps) - Suppression of Allergen risk reduction program table at the end of the document

Associated document (level 1)

Document	Title
MAQ016	Chemical Compliance Process

Associated document (level 2)

Document	Title
PRO002	Management of AQC Quality Control for leather
PRO007	Management of AQC Quality Control for insides

Associated document (level 3)*

Document	Title
-	-

* Internal documents – not disclosed.

RESTRICTED SUBSTANCES LIST FOR LEATHER

Scope of the document

This document defines the list of restricted dangerous chemical substances and testing requirements in the context of leather as specified by AQC.

For the definition of the limit present in this Restricted Substances List (RSL), AQC takes into consideration all the current international regulations for dangerous substances available and select the strictest limit. The list of chemicals present in this document has been selected on a risk-based approach completed by AQC experience and knowledge.

International regulations mentioned in this document are:

Abbreviation	Regulation	Country	Comment
16CFR1303	Ban of lead-containing paint and certain consumer products bearing lead-containing paint	USA	-
EU 2016/425	Regulation (EU) 2016/425 of the European Parliament and of the council of 9 March 2016 on Personal Protective Equipment	European Union	pH limits present in NF EN 420 norm Protective gloves - General requirements and test methods - Gants de protection
EU POP	Regulation (EU) 2019/1021 of the European Parliament and of the Council on persistent organic pollutants	European Union	-
GB 20400-2006	Leather and fur—Limit of harmful matter	China	-
JP112	Law on Control of Household Products Containing Harmful Substances	Japan	-
OChim	Ordinance on Protection against Dangerous Substances and Preparations	Switzerland	-
ORRChim	Ordinance on the Reduction of Risks relating to the Use of Certain Particularly Dangerous Substances, Preparations and Articles	Switzerland	-
Proposition 65	Safe Drinking Water and Toxic Enforcement Act	USA (California)	-
REACH XIV	Regulation (EC) no 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)	European Union	Annex XIV Substances subject to authorisation
REACH XVII			Annex XVII Substances subject to restriction
REACH SVHC			Substances of Very High Concern

Specific AQC consideration

In the column for regulation, "AQC" stands for extra-regulatory limit set by AQC in a pro-active way:

- "AQC" alone is applied for substances without known regulation
For some substances, AQC performs testing without limit (for information) or with a limit concentration
- (AQC) after a regulation indicate that the scope has been enlarged to leather by AQC or that the limit applied by AQC is lower than requested by the more stringent regulation.

Examples:

- TEPA (CAS 545-55-1)

AQC limit
REACH Annex XVII Entry 7 (AQC)

Entry 7 of REACH Annex XVII bans the use of this substance in textile only. AQC applies extra-legal limit by also applying TEPA ban to leather.

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- Organotins

AQC limit	Regulation
1 mg/kg of tin	REACH XVII entry 20 (AQC)

Entry 20 of the annex XVII of REACH limits certain organo-tins to 1000 mg/kg.

AQC Bracelet manufacturers apply an extra-legal limit of 1 mg/kg for total tin to engage organo-tins testing.

AQC limit for REACH SVHCs

Article 33(1) of REACH requires that a supplier of articles containing a SVHC included in the Candidate List for authorization in a concentration above 0.1% (w/w) has to provide relevant safety information to the recipients of these articles (Watch Brands). Upon request of a consumer, Watch Brands have to provide relevant safety information about the SVHC to this consumer (Article 33(2) of REACH).

This requirement is also present in Swiss ordinance OChim, article 71.

There is no regulatory requirement to limit SVHC content in articles to 1'000 mg/kg. Nevertheless, AQC Bracelet manufacturers limit all SVHC listed substances to 1'000 mg/kg in leather bracelet and also in leather before manufacturing.

AQC limit for Proposition 65

For substances listed in the Proposition 65 California, AQC limits take into account the limit in articles present in the case law of Proposition 65 and more precisely the limits indicated in the reformulation injunctions of settlements and judgements.

AQC considers in case law: leather articles and related articles to the watch bracelet but also any other article with a related exposure scenario (skin contact).

For substances without any indication of a limit in articles, AQC performs testing of a risk-based selection of substances potentially used for leather production and keeps available for Watch Brands all the data as a support for labelling decision.

AQC limit for EU POP

AQC limits for substances EU POP regulation are in full accordance with the terms detailed for each substance.

AQC requirements for laboratory testing

- Sample picture

Picture of leather samples received by the laboratory have to be taken **without** plastic bag.

- Sample preparation

Leather sample preparation requested by AQC is the one indicated in the chapter "Sampling and sample preparation" of the testing methods indicated in the present RSL.

In case of reference to ISO 4044 only, grinding method should be selected as samples provided by AQC for bovine leather (A4) and alligator leather (8 sides) have a surface above 20x20 cm requested for grinding in ISO 4044.

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Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Strictest Regulation	Test Method
Aldehydes	Formaldehyde	-	50-00-0	75 mg/kg	GB 20400-2006	ISO 17226-1
	Glutaraldehyde	-	111-30-8	1000 mg/kg	REACH SVHC	adapted ISO 17226-1
Aromatic amines	Biphenyl-4-ylamine	-	92-67-1	< 30 mg/kg each	REACH XVII (entry 43)	ISO 17234
	Benzidine	-	92-87-5			
	4-chloro-o-toluidine	-	95-69-2			
	2-naphthylamine	-	91-59-8			
	4-o-tolylazo-o-toluidine	-	97-56-3			
	5-nitro-o-toluidine	-	99-55-8			
	4-chloroaniline	-	106-47-8			
	4-methoxy-m-phenylenediamine	-	615-05-4			
	4,4'-methylenedianiline	MDA	101-77-9			
	3,3'-dichlorobenzidine	-	91-94-1			
	3,3'-dimethoxybenzidine	-	119-90-4			
	4,4'-bi-o-toluidine	-	119-93-7			
	4,4'-methylenedi-o-toluidine	-	838-88-0			
	6-methoxy-m-toluidine	-	120-71-8			
	4,4'-methylenebis[2-chloroaniline]	MOCA	101-14-4			
	4,4'-oxydianiline	-	101-80-4			
	4,4'-thiodianiline	-	139-65-1			
	o-toluidine	-	95-53-4			
	4-methyl-m-phenylenediamine	-	95-80-7			
	2,4,5-trimethylaniline	-	137-17-7			
4-methyl-m-phenylenediamine	-	90-04-0				
4-aminoazobenzene	-	60-09-3				
2,6-xylidine	-	87-62-7				
2,4-xylidine	-	95-68-1				
Formaldehyde, oligomeric reaction products with aniline	Polymeric MDA	25214-70-4	for information	AQC		
p-phenylenediamine	PPD	106-50-3		Prop 65		
Aniline	-	62-53-3				
Biocides	(benzothiazol-2-ylthio) methyl thiocyanate	TCMTB	21564-17-0	for information	AQC	ISO 13365
	4-chloro-3-methylphenol (chlorocresol)	PCMC	59-50-7	for information	AQC	
	Biphenyl-2-ol	OPP	90-43-7	for information	Prop 65	
	2-octyl-2H-isothiazol-3-one	OIT	26530-20-1	for information	AQC	
	Dimethylfumarate	DMFu	624-49-7	0.1 mg/kg	REACH ORRChim	ISO 16186
Bisphenols	4,4'-isopropylidenediphenol (bisphenol A)	BPA	80-05-7	1000 mg/kg	REACH SVHC	Methanol extraction/ ultrasound LC detection
	4,4'-(1-methylpropylidene)bisphenol (bisphenol B)	BPB	77-40-7	1000 mg/kg		
	4,4'-[2,2,2-trifluoro-1 (trifluoromethyl)ethylidene]diphenol (bisphenol AF)	BPAF	1478-61-1	for information	REACH restriction intention	
	2,2'-methylenebisphenol (bisphenol F)	BPF	2467-02-9			
	4,4'-sulphonyldiphenol (bisphenol S)	BPS	80-09-1			
Chlorophenols	Pentachlorophenols	PCP	87-86-5	0.5 mg/kg	ORRChim	ISO 17070
	Tetrachlorophenols	TeCP	25167-83-3	0.5 mg/kg		
	2,3,4,5-		4901-51-3			
	2,3,4,6-		58-90-2			
2,3,5,6-	935-95-5					
2,4,6-Trichlorophenols	TCP	88-06-2	for information	Prop65		

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Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Strictest Regulation	Test Method
Chlorine compounds	Alkanes, C10-13, chloro	SCCP	85535-84-8	1000 mg/kg	REACH SVHC ORRChim EU POP	ISO 18219
	Alkanes, C14-17, chloro	MCCP	85535-85-9 198840-65-2 1372804-76-6	1000 mg/kg	REACH SVHC	
Flame retardants	Polybromobiphenyls	PBB	59536-65-1	not detected	REACH XVII entry 8 (AQC)	ISO 17881-1
	Diphenyl ether, pentabromo derivative	PentaBDE	32534-81-9		EU POP	
	Diphenyl ether, octabromo derivative	OctaBDE	32536-52-0			
	Diphenyl ether, decabromo derivative	DecaBDE	1163-19-5			
	Diphenyl ether, tetrabromo derivative	TetraBDE	40088-47-9			
	Diphenyl ether, heptabromo derivative	HeptaBDE	68928-80-3			
	Diphenyl ether, hexabromo derivative	HexaBDE	36483-60-0			
	Diphenyl ether, nonabromo derivative	NonaBDE	63936-56-1	AQC		
	Hexabromocyclododecane and isomers	HBCDD	Several CAS	25 mg/kg	Proposition 65	ISO 17881-2
	Tris(1,3-dichloro-2-propyl)phosphate	TDCCP	13674-87-8	25 mg/kg	Prop65	
	2,2',6,6'-tetrabromo-4,4'-isopropylidenediphenol (Tetrabromobisphenol A)	TBBPA	79-94-7	information	Prop65	
	Tri(aziridin-1-yl) phosphine oxide	TEPA	545-55-1	not detected	REACH XVII entry 7 (AQC)	
	Tris(2-chloroethyl) phosphate	TCEP	115-96-8	25 mg/kg	Proposition 65	
	Tris(2,3-dibromopropyl) phosphate	TRIS	126-72-7	25 mg/kg	Proposition 65	
Triphenyl phosphate	TPP	115-86-6	information	AQC		
Metals	Chromium (VI)	Cr(VI)	18540-29-9	3 mg/kg of dry matter	REACH XVII entry 47	ISO 17075-2
	Cadmium	Cd	7440-43-9	100 mg/kg	REACH XVII entry 23	ISO 17072-2
	Lead	Pb	7439-92-1	90 mg/kg	16CFR1303	
	Arsenic	As	7440-38-2	1 mg/kg	AQC	
	Mercury	Hg	7439-97-6	1 mg/kg	JP 112	
	Tin ¹	Sn	7440-31-5	1 mg/kg	REACH XVII entry 20 (AQC)	
	Chromium	Cr	7440-47-3	for information	AQC	ISO 17072-1
	Antimony	Sb	7440-36-0			
	Cobalt Extractable	Co	7440-84-4			
	Nickel Extractable	Ni	7440-02-0			

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Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Strictest Regulation	Test Method
PFOS and related substances	Perfluorooctanesulfonic acid	PFOS	1763-23-1	1 µg/m ² (sum)	ORRChim EU POP	CEN 15968
	Perfluorooctanesulfonic acid, potassium salt	PFOS-K	2795-39-3			
	Perfluorooctanesulfonic acid, lithium salt	PFOS-Li	29457-72-5			
	Perfluorooctanesulfonic acid, ammonium salt	PFOS-NH ₄	29081-56-9			
	Perfluorooctane sulfonate diethanolamine salt	PFOS-NH(OH) ₂	70225-14-8			
	Perfluorooctanesulfonic acid, tetraethylammonium salt	PFOS-N(C ₂ H ₅) ₄	56773-42-3			
	N-Ethylperfluoro-1-octanesulfonamide	N-Et-FOSA	4151-50-2			
	N-Methylperfluoro-1-octanesulfonamide	N-Me-FOSA	31506-32-8			
	2-(N-Ethylperfluoro-1-octanesulfonamido)-ethanol	N-Et-FOSE	1691-99-2			
	2-(N-Methylperfluoro-1-octanesulfonamido)-ethanol	N-Me-FOSE	24448-09-7			
	Perfluoro-1-octanesulfonyl fluoride	POSF	307-35-7			
Perfluorooctane sulfonamide	PFOSA	754-91-6				
PFOA and its salts	Perfluorooctanoic acid	PFOA	335-67-1	0.025 mg/kg (sum)	EU POP	
	Sodium perfluorooctanoate	PFOA-Na	335-95-5			
	Potassium perfluorooctanoate	PFOA-K	2395-00-8			
	Silver perfluorooctanoate	PFOA-Ag	335-93-3			
	Perfluorooctanoyl fluoride	PFOA-F	335-66-0			
	Ammonium pentadecafluorooctanoate	APFO	3825-26-1			
PFOA related substances	1H,1H,2H,2H-Perfluorodecanesulfonic acid	8:2 FTS	39108-34-4	1 mg/kg (sum)	EU POP	
	Methyl perfluorooctanoate (Me-PFOA)	Me-PFOA	376-27-2			
	Ethyl perfluorooctanoate (Et-PFOA)	Et-PFOA	3108-24-5			
	2-Perfluorooctylethanol (8:2 FTOH)	8:2 FTOH	678-39-7			
	1H,1H,2H,2H-Perfluorodecyl acrylate	8:2 FTA	27905-45-9			
	1H,1H,2H,2H-Perfluorodecyl methacrylate	8:2 FTMA	1996-88-9			
C9-C14 PFCAs, their salts and related substances	Henicosafuoroundecanoic acid	PFUnA	2058-94-8	0.025 mg/kg (sum)	REACH XVII Entry 68 (AQC)	ISO 23702-1
	Heptacosafuorotetradecanoic acid	PFTDA	376-06-7			
	Pentacosafuorotridecanoic acid	PFTTrDA	72629-94-8			
	Tricosafuorododecanoic acid	PFDoDA	307-55-1			
	Perfluorononanoic acid and its sodium and ammonium salts	PFNA	375-95-1			
	Nonadecafluorodecanoic acid and its sodium and ammonium salts	PFDA	3108-42-7 3830-45-3 335-76-2			
	C9-C14 PFCAs related substances	-	several	0.260 mg/kg (sum)		
C4-C6 PFAS	Perfluorohexane-1-sulphonic acid	PFHxS	355-46-4	1000 mg/kg	REACH SVHC	
	Perfluorobutane sulfonic acid and its salts	PFBS	375-73-5 375-72-4 25628-08-4 34454-97-2	1000 mg/kg		
	Undecafluorohexanoic acid, its salts and related substances	PFHxA	several	for information		



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Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Strictest Regulation	Test Method
Phenols	Octylphenols - 4-(1,1,3,3-tetramethylbutyl)phenol	OP (PTOP)	- 140-66-9	100 mg/kg (sum OP+OPEO)	REACH SVHC OChim (AQC)	ISO 18218
	Octylphenol ethoxylates - 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated	OPEO -	- 9002-93-1 2497-59-8 2315-67-5 2315-61-9			
	Nonylphenols - 4-Nonylphenol, branched and linear	NP 4-NP	25154-52-3 several CAS	100 mg/kg (sum NP+NPEO)	REACH SVHC (AQC)	
	Nonylphenol Ethoxylates - 4-Nonylphenol, branched and linear, ethoxylated Incl. isononylphenol	NPEO (4-NPEO)	- several CAS 11066-49-2			
Phthalates	Diisobutyl phthalate	DIBP	84-69-5	1000 mg/kg (sum)	REACH XVII entry 51	ISO 16181
	Dibutyl phthalate	DBP	84-74-2			
	Benzyl butyl phthalate	BBP	85-68-7			
	Bis(2-ethylhexyl) phthalate	DEHP	117-81-7			
	Bis(2-methoxyethyl) phthalate	DMEP	117-82-8	1000 mg/kg (each)	REACH SVHC	
	1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters	DHNUP (L&R)	68515-42-4			
	1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich	-	71888-89-6			
	Di-isopentyl phthalate	DIPP	605-50-5			
	Di-n-pentyl phthalate	DnPP	131-18-0			
	N-pentyl-isopentylphthalate	nPIPP	776297-69-9			
	1,2-Benzenedicarboxylic acid, dipentyl ester, branched and linear	DNiPP (L&R)	84777-06-0			
	Di-n-hexyl phthalate	DnHP	84-75-3			
	1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear	DIHxP (L&R)	68515-50-4			
	1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters or mixed decyl and hexyl and octyl diesters	-	68648-93-1 68515-51-5			
	Dicyclohexyl phthalate	DHCP	84-61-7			
	Diisohexyl phthalate	DIHP	71850-09-4			
	Di-n-octyl phthalate	DNOP	117-84-0			
	Di-"isononyl" phthalate	DINP	28553-12-0 68515-48-0			
Di-"iso-decyl" phthalate	DIDP	26761-40-0 68515-49-1	REACH XVII entry 52 (AQC)			

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Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Strictest Regulation	Testing Method
Physical	Hydrogen ion	pH	-	3.5 - 9.5	EU 2016/425 (AQC)	ISO 4045
Polycyclic Aromatic Hydrocarbons (PAHs)	Benzo(a)pyrene	BaP	50-32-8	1 mg/kg	REACH XVII (entry 50) ORRChim	AFPS-GS-2019-01-PAK
	Benzo(a)anthracene	BaA	56-55-3	1 mg/kg		
	Benzo(b)fluoranthene	BbF	205-99-2	1 mg/kg		
	Benzo(e)pyrene	BeP	192-97-2	1 mg/kg		
	Benzo(j)fluoranthene	BjF	205-82-3	1 mg/kg		
	Benzo(k)fluoranthene	BkF	207-08-9	1 mg/kg		
	Chrysene	CHR	218-01-9	1 mg/kg		
	Dibenzo(a,h)anthracene	DBA	53-70-3	1 mg/kg	REACH SVHC OChim	
	Phenanthrene	PEH	85-01-8	1000 mg/kg		
	Fluoranthene	FLT	206-44-0	1000 mg/kg		
	Pyrene	PYR	129-00-0	1000 mg/kg		
	Benzo(g,h,i)perylene	BPE	191-24-2	1000 mg/kg	Prop 65	
	Anthracene	-	191-24-2	5 mg/kg*		
	Indeno(1,2,3-cd)pyrene	IPY	193-39-5	for information	AQC	
	Naphtalene	NAP	91-20-3	for information		
	Acenaphthylene	ANY	208-96-8	for information	AQC	
Acenaphtalene	ANA	83-32-9	for information			
Fluorene	FLU	86-73-7	for information			
VOCs	N,N-dimethylformamide	-	68-12-2	1000 mg/kg	REACH SVHC Ochim	ISO 16189
	2-methoxyethanol	EGME	109-86-4	1000 mg/kg		EPA 8260C or internal Headspace GC-MS

* because of Anthracene oil, anthracene paste, distn lights (contain 0.5% to 25% of anthracene) CAS 91995-17-4 (REACH SVHC)

¹ In case of total Tin > 1 mg/kg, the following testing is performed:

Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Regulation	Test Method
Organotins	Tributyltin and related compounds Incl. TBT metacrylate	TBT	several CAS incl. 2155-70-6	1 mg/kg	REACH XVII entry 20 & REACH SVHC (AQC)	ISO 16179
	Triphenyltin and related compounds Incl. TPT hydroxide	TPT	several CAS incl. 76-87-9			
	All other tri-substitued tin compounds	-	Several CAS			
	Dibutyltin and related compounds	DBT	several CAS incl. 683-18-1			
	Diocetyl tin and related compounds	DOT	several CAS			
	Di-μ-oxo-di-n-butylstanniohydroxyboran (Dibutyltin hydrogen borate)	DBB	75113-37-0	1000 mg/kg	REACH XVII entry 21	



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OPTION FOR METAL FREE LEATHER

Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Regulation	AQC required Method
Tanning metals	Chromium	Cr	7440-47-3	1000 mg/kg (Sum)	ISO 15115	ISO 17072-2
	Aluminium	Al	7429-90-5			
	Titanium	Ti	7440-32-6			
	Iron	Fe	7439-89-6			
	Zirconium	Zr	7440-67-7			

OPTION FOR VEGETAL TANNED LEATHER

Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Regulation	AQC required Method
Tanning metals	Chromium	Cr	7440-47-3	3000 mg/kg (Sum)	ISO 15115	ISO 17072-2
	Aluminium	Al	7429-90-5			
	Titanium	Ti	7440-32-6			
	Iron	Fe	7439-89-6			
	Zirconium	Zr	7440-67-7			









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Final Audit Report

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