

 ASSOCIATION POUR L'ASSURANCE QUALITÉ DES FABRICANTS DE BRACELETS CUIR		DOC nb	LIS001_13
		Replace	LIS001_12
RESTRICTED SUBSTANCES LIST FOR LEATHER			
Application date: 27Mar23			Page 1/9
Written by	Quality review (signature/date)	Process owner (signature/date)	
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Change log

Version	Date	Modification
13	27Mar23	Revision Decisions TWG 29Sep22 (action CQI-22-068) - Add of the following SVHC <ul style="list-style-type: none"> o N-(hydroxymethyl)acrylamide CAS 924-42-5 o Melamine CAS 108-78-1 o 2-ethoxyethanol CAS 110-80-5 - Suppression of flame retardants Decisions TWG 12Jun23 (action CQI-23-077) - Bisphenol S CAS 80-09-1 - limit 1'000 mg/kg (SVHC entry) Decisions TWG 16Mar23 (action CQI-23-079) - EU POP - Add of ECHA Q&As rule for PFOS & related substances limits - Update of sample preparation to be fully compliant with ISO methods and ISO 4044 - Aldehydes - Transfer of glutaraldehyde in options for metal free and vegetable tanned leather - Aromatic amines - Correction of name for substance with CAS 90-04-4 - Aromatic amines - Add of note for similar aromatic amines of entry 72 - Biocides - Method precision: part 1 of ISO 13365 (acetonitrile extraction) - Metals - Add of Chromium (VI) related compounds - Metals - Add of extractable Arsenic, Cadmium & Lead (REACH entry 72) - Phenols - Precision/add of CAS number for isononylphenol and isononylphenol ethoxylated - PAHs - Correction of CAS number for anthracene (action CQI-22-026a) - SVHC - Add of Barium diboron tetraoxide CAS 13701-59-2

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
PRO034	Analytical investigation in case of Out of Specification result

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 compliance as specified by AQC.

To define the limits 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, Authorization and Restriction of Chemicals (REACH)	European Union	Annex XIV Substances subject to authorization
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-legal 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.

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.

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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 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 similar 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 present in EU POP regulation are in full accordance with the terms detailed for each substance within the annexes.

For PFOS & related substances, by default the limit applied in this RSL is 1 µg/m².

Nevertheless, as indicated in ECHA Q&A 1851 version 1.0 of 23/09/2021, the limit to be applied is different from a non-coated leather to a coated leather.

The testing scheme to be performed and decision rules are detailed in AQC procedure PRO034.

AQC requirements for laboratory testing

- Sample picture

Picture of leather samples received by the laboratory must 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.

RESTRICTED SUBSTANCES LIST FOR LEATHER

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
Aromatic amines	Biphenyl-4-ylamine	-	92-67-1	< 30 mg/kg each	REACH XVII entries 43 & 72 ¹ & GB 20400-2006	ISO 17234
	Benzidine	-	92-87-5			
	4-chloro-o-toluidine ¹	-	95-69-2			
	2-naphthylamine ¹	-	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 ¹	-	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 ¹	-	137-17-7			
o-anisidine	-	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	ISO 13365-1	
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 13365-1
	4-chloro-3-methylphenol (chlorocresol)	PCMC	59-50-7		AQC	
	Biphenyl-2-ol	OPP	90-43-7		Prop 65	
	2-octyl-2H-isothiazol-3-one	OIT	26530-20-1		AQC	
	Dimethylfumarate	DMFu	624-49-7	0.1 mg/kg	REACH entry 61 ORRChim	ISO 16186
Bisphenols	4,4'-isopropylidenediphenol (bisphenol A)	BPA	80-05-7	1'000 mg/kg	REACH SVHC	Methanol extraction/ ultrasound LC detection
	4,4'-(1-methylpropylidene)bisphenol (bisphenol B)	BPB	77-40-7	1'000 mg/kg		
	4,4'-sulphonyldiphenol (bisphenol S)	BPS	80-09-1	1'000 mg/kg		
	4,4'-[2,2,2-trifluoro-1-(trifluoromethyl)ethylidene]diphenol (bisphenol AF)	BPAF	1478-61-1	for information	REACH restriction proposal	
	2,2'-methylenediphenol (bisphenol F)	BPF	2467-02-9			
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	1'000 mg/kg	REACH SVHC ORRChim EU POP	ISO 18219-1	
	Alkanes, C14-17, Chloro	MCCP	85535-85-9 198840-65-2 1372804-76-6	1'000 mg/kg	REACH SVHC	ISO 18219-2	
Metals	Chromium (VI) and its related substances ³	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		
	Lead	Pb	7439-92-1	90 mg/kg	16CFR1303		
		Arsenic	As	7440-38-2	1 mg/kg	AQC	ISO 17072-2
		Mercury	Hg	7439-97-6	1 mg/kg	JP 112	
		Tin ³	Sn	7440-31-5	1 mg/kg	REACH XVII entry 20 (AQC)	
		Chromium	Cr	7440-47-3	for information	AQC	
		Antimony	Sb	7440-36-0		REACH XVII proposal (AQC)	ISO 17072-1
		Cobalt extractable	Co	7440-84-4		1 mg/kg	
		Nickel extractable	Ni	7440-02-0	1 mg/kg		
		Arsenic extractable	As	7440-38-2	1 mg/kg		
		Cadmium extractable	Cd	7440-43-9	1 mg/kg	REACH XVII entry 72	
		Lead extractable	Pb	7439-92-1	1 mg/kg		
Phenols	Octylphenols	OP	-	100 mg/kg (sum OP+OPEO)	REACH SVHC OChim (AQC)	ISO 18218	
	- 4-(1,1,3,3-tetramethylbutyl)phenol	(PTOP)	140-66-9				
	Octylphenol ethoxylates	OPEO	-				
	- 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated	-	9002-93-1 2497-59-8 2315-67-5 2315-61-9				
	Nonylphenols	NP	25154-52-3	100 mg/kg (sum NP+NPEO)	REACH SVHC (AQC)		
	- 4-Nonylphenol, branched and linear - Isononylphenol	4-NP -	several CAS 11066-49-2				
	Nonylphenol Ethoxylates	NPEO	-				
	- 4-Nonylphenol, branched and linear, ethoxylated Incl. isononylphenol ethoxylated	(4-NPEO) -	several CAS 37205-87-2				
Phthalates	Diisobutyl phthalate	DIBP	84-69-5	1'000 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	1'000 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				REACH XVII entry 52 (AQC)
	Di-"isononyl" phthalate	DINP	28553-12-0 68515-48-0				
	Di-"iso-decyl" phthalate	DIDP	26761-40-0 68515-49-1				

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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			
	1-Decanaminium, N-decyl-N,N-dimethyl-, salt with heptadecafluorooctane-1-sulfonic acid (1:1)	-	251099-16-8			
PFOA and its salts	Perfluorooctanoic acid	PFOA	335-67-1	0.025 mg/kg (sum)	EU POP	ISO 23702-1
	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			
	Chromium(3+) perfluorooctanoate	-	68141-02-6			
	Ethanaminium, N,N,N-triethyl-, salt with pentadecafluorooctanoic acid (1:1)	-	98241-25-9			
PFOA related substances	1H,1H,2H,2H-Perfluorodecanesulfonic acid	8:2 FTS	39108-34-4	1 mg/kg (sum)	EU POP	ISO 23702-1
	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			
	2H,2H,3H,3H-Perfluoroundecanoic acid	4HPFUnA	34598-33-9			
	Perfluoro-3,7-dimethyloctanoic acid	PF3,7 DMOA	172155-07-6			
	1H,1H,2H,2H-Perfluorododecyl acrylate	10:2 FTA	17741-60-5			
	1H,1H,2H,2H-Perfluorododecan-1-ol	10:2 FTOH	865-86-1			
C9-C14 PFCAs, their salts and related substances	Henicosafuoroundecanoic acid	PFUnA	2058-94-8	0.025 mg/kg (sum)	REACH XVII Entry 68 (AQC)	
	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	1'000 mg/kg	REACH SVHC	
	Perfluorobutane sulfonic acid and its salts	PFBS	375-73-5 375-72-4 25628-08-4 34454-97-2	1'000 mg/kg		
	Perfluoroheptanoic acid and its ammonium, sodium and potassium salts	PFHpA	375-85-9 6130-43-4 20109-59-5 21049-36-5	1'000 mg/kg	REACH SVHC	
	Undecafluorohexanoic acid, its salts and related substances	PFHxA	several	for information	REACH restriction intention	

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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	1'000 mg/kg		
	Fluoranthene	FLT	206-44-0	1'000 mg/kg		
	Pyrene	PYR	129-00-0	1'000 mg/kg		
	Benzo(g,h,i)perylene	BPE	191-24-2	1'000 mg/kg	Prop 65	
	Anthracene	-	120-12-7	5 mg/kg ⁴		
	Indeno(1,2,3-cd)pyrene	IPY	193-39-5	for information		
	Naphtalene	NAP	91-20-3	for information	AQC	
Acenaphtylene	ANY	208-96-8	for information			
Acenaphtene	ANA	83-32-9	for information			
Fluorene	FLU	86-73-7	for information			
SVHCs	N,N-dimethylformamide	-	68-12-2	1'000 mg/kg	REACH SVHC Ochim	ISO 16189
	2-methoxyethanol	EGME	109-86-4	1'000 mg/kg		internal methods
	2-ethoxyethanol	EGEE	110-85-5	1'000 mg/kg		
	N-(hydroxymethyl)acrylamide	-	924-42-5	1'000 mg/kg		
	Melamine	-	108-78-1	1'000 mg/kg		
	Barium diboron tetraoxide		13701-59-2	1'000 mg/kg		

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NOTES

¹ Analytical equivalence between aromatic amines listed in entry 43 and entry 72 of REACH Annex XVII

Entry 43			Entry 72		
Substance name	CAS number	Formula	Substance name	CAS number	Formula
4-chloro-o-toluidine	95-69-2		4-chloro-o-toluidinium chloride	3165-93-3	
2-naphthylamine	91-59-8		2-naphthylammoniumacetate	553-00-4	
4-methoxy-m-phenylenediamine	615-05-4		4-methoxy-m-phenylenediammonium sulphate	39146-41-7	
2,4,5-trimethylaniline	137-17-7		2,4,5-trimethylaniline hydrochloride	21436-97-5	

² Chromium (VI) related substances stands for the following substances:

- Sodium chromate (CAS 7775-11-3)
- Sodium dichromate (CAS 7789-12-0, CAS 10588-01-9)
- Potassium chromate (CAS 7789-00-6)
- Potassium dichromate (CAS 7778-50-9)
- Ammonium dichromate (CAS 7789-09-5)
- Chromium trioxide (CAS 1333-82-0)
- Chromic acid (CAS 7738-94-5)
- Oligomers of chromic acid and dichromic acid and strontium chromate (CAS 7789-06-2)
- Potassium hydroxyoctaoxodizincatedichromate (1-) (CAS 11103-86-9)
- Pentazinc chromate octahydroxide (CAS 49663-84-5)
- Dichromium tris(chromate) (CAS 24613-89-6)

³ In case of total Tin > 1 mg/kg, the following testing below 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	1'000 mg/kg	REACH XVII entry 21	

⁴ Limit based on REACH SVHC CAS 91995-17-4 Anthracene oil, anthracene paste, distn lights containing **0.5%** to 25% of anthracene



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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	1'000 mg/kg (Sum)	ISO 15115	ISO 17072-2 Annex B
	Aluminium	Al	7429-90-5			
	Titanium	Ti	7440-32-6			
	Iron	Fe	7439-89-6			
	Zirconium	Zr	7440-67-7			
Aldehyde	Glutaraldehyde	-	111-30-8	1'000 mg/kg	REACH SVHC	adapted ISO 17226-1

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	3'000 mg/kg (Sum)	ISO 15115	ISO 17072-2 Annex B
	Aluminium	Al	7429-90-5			
	Titanium	Ti	7440-32-6			
	Iron	Fe	7439-89-6			
	Zirconium	Zr	7440-67-7			
Aldehyde	Glutaraldehyde	-	111-30-8	1'000 mg/kg	REACH SVHC	adapted ISO 17226-1









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Final Audit Report

2023-03-17

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