



THE VERY GROUP



Restricted Substance List

Version	1.0
Issue Date	November 2021
Prepared by	Intertek

The following list gives guidelines on hazardous substances and identifies limits which are legal requirements or requirements to be followed in the production of The Very Group (TVG) products

All Suppliers to THE VERY GROUP (TVG) must take all reasonable steps to ensure these banned and restricted substances are eliminated or reduced to within acceptable limits.

Testing and quality control processes within the extended supply chain are required activities.

Mandatory testing and the need to present compliance certificates a may be required by THE VERY GROUP (TVG) to illustrate compliance.

All due diligence must be recorded and presented when requested by THE VERY GROUP (TVG)

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1. The REACH etc. (Amendment etc.) (EU Exit) Regulations 2020 REACH Regulation 1907/2006/EC and amendments

REACH is the Regulation for **R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemicals. The requirements are valid in the UK and similar requirements apply in all EU Member States. The main purpose of this Regulation is to maintain the highest possible level of protection for human health and for the environment.

Under REACH, the manufacturer and supplier must know the chemical composition of their product and quantities of substances within them in order to:

- Restrict the use of dangerous substances
- Reduce the use of SVHCs
- Communicate SVHC information throughout the supply chain (i.e. obligation to inform)

REACH involves the Registration, Evaluation, Authorisation and restriction of Chemicals. Generally, it applies to all individual chemical substances on their own, in **preparations** or in **articles** (if the substance is intended to be released during normal and reasonably foreseeable conditions of use from an article).

Articles must:

- Not contain substances restricted under REACH other than the specified limit
- If an article contains more than 0.1% of a Substance of Very High Concern (SVHC) (see section detailed “Duty to inform in accordance with Article 33”) then the next person in the supply chain must be informed. Also, if an article does contain over 0.1% of a SVHC then the amount of the substance (in each product) calculated over the entire product range, imported per year must be determined. If more than a tonne of any of these SVHCs is imported in a year, then there is an obligation to inform the European Chemicals Agency (ECHA).

Preparations:

- The individual ingredients and their weights in percentage must be identified for each preparation over an entire product range in order to determine if more than a tonne (over the entire product range) of the ingredient is imported (or is produced) per year. If more than a tonne is imported, then

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registration is required. For example, if your product is considered under REACH as an article + mixture (e.g. pen & ink = article + mixture), the ink of your pens may fall under REACH Registration requirements.

2. Duty to inform

Some substances have hazardous properties of very high concern because the effects they can have on humans and the environment are very serious and often are irreversible. These include substances which are: Carcinogenic, Mutagenic or Toxic to Reproduction (CMR); Persistent, Bioaccumulative and Toxic (PBT); very Persistent and very Bioaccumulative (vPvB) according to the criteria in Annex XIII of the REACH Regulation.

In the UK, the restriction of chemicals is covered by the HSE (Health and Safety Executive) under UK REACH

<https://www.hse.gov.uk/reach/>

The European Chemical Agency ECHA has responsibility for the European Union

ECHA has published a candidate list of Substances of Very High Concern (SVHC). The regulation applies to articles manufactured or imported into the EU in quantities of 1 tonne or more per year. Pursuant to Section 33 of the EC-Regulation, each supplier has the obligation to inform the purchaser of the goods if the product contains a substance of the "candidate list" in a concentration of more than 0.1 (1,000 ppm) mass percentages.

A link to the ECHA list is detailed below

<https://echa.europa.eu/candidate-list-table>

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3. Annex XVII Restrictions

Restrictions in REACH Annex XVII can vary from banning of certain substances and permissible limits for other substances in articles. The below information details some of the key risk substances which may be present in textile products. A more detailed summary of chemicals is provided in the RSL (Restricted Substance List).

3.1. Nonyl Phenyl Ethoxylate (NPEO)

Entry 46, 46a

NPEO is widely used in textile processing. It is harmful to the environment and has been restricted in textile products which are intended to be washed. The restriction in washable items is 100 mg/kg.

3.2 Total Cadmium

Entry 23

Annex XVII restricts cadmium levels in paints, paint on painted articles and metal parts of jewellery, whether accessible or not. The restriction for polymeric and metal parts of jewellery items is 100 mg/kg.

3.3 Phthalates

Entry 51

No articles shall be placed on the market that contain more than 1000 mg/kg of DIBP either on its own or in combination of any of: DEHP, DBP or BBP.

Entry 52

Phthalate restrictions apply to plasticised materials in toys and childcare articles

≤ 1000 mg/kg (sum of DIDP, DINP and DNOP) for plasticised materials in toys and childcare articles which can be placed in the mouth by children

Entry 72

There are further restrictions on phthalates in clothing and similar articles in the CMR restriction of Entry 72

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3.4. Azo Dyes

Entry 43

This restriction applies to textile and leather articles which may come into direct and prolonged contact with the human skin or oral cavity. Materials shall not contain azo dyestuffs or azo pigments which can undergo a breakdown under chemically reducing conditions at a level of greater than of 30 mg/kg of any of the restricted aromatic amines.

3.5. Nickel release

Entry 23

The restriction applies to metal components which are to be in direct and prolonged contact with the skin
 Post assemblies that are intended to be inserted into a pierced part of the human body, must have a nickel release of less than 0.2µg/cm²/week
 Jewellery items which come into direct and prolonged contact with the skin must have a nickel release not exceeding 0.5µg/cm²/week.
 Items which have a non-nickel coating must not exceed 0.5µg/cm²/week for a period of at least two years of normal use of the item.

3.6. Total Lead

Entry 63

Lead is well known toxin which is implicated in the development of brain function. The REACH restriction is 500 mg/kg for items which are small enough to be placed in the mouth of a child and also in jewellery items

3.7 Chromium VI (Hexavalent chromium)

Entry 47

Chromium VI is known to be a carcinogen and is corrosive to the skin sometimes causing skin ulcers. It is associated with the tanning of leather hides. Leather articles or leather parts of articles coming into contact with the skin shall not be placed on the market where they contain chromium VI in concentrations equal to or greater than 3 mg/kg

3.8. Formaldehyde

CMR restriction – Entry 72

Free and hydrolysed formaldehyde is restricted to a limit of 75 mg/kg for items with skin contact

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3.9 Flame retardants (TRIS, TEPA, PBB) in textiles

TRIS, TEPA and PBB additives have been used to reduce the flammability of textile articles, such as garments, undergarments and linen, intended to come into contact with the skin. They are considered to be carcinogens. The use of the flame retardants TRIS, TEPA and PBB in textile articles intended for skin contact is prohibited under REACH.

3.10. Dimethyl fumarate**Entry 61**

Dimethyl fumarate is most likely to be found in high risk materials such as textiles, foam and wood (usually natural products transported in humid environments). A product or part of the product containing DMFu in a concentration of greater than 0.1 mg/kg is prohibited from being placed or made available on the market.

3.11. CMRs In Textiles**Entry 72**

This restriction applies to 10 classes of substances which may be present in textiles and are considered to be harmful as CMR substances (carcinogens, mutagens and toxic to reproduction)

The substance classes are

- Metals
- Aryl amines salts
- Carcinogenic dyestuffs
- Formaldehyde
- Benzene
- Quinoline

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- Chlorinated aromatic hydrocarbons
- Phthalates
- Solvents (DMAC, DMFa, NMP)
- Polyaromatic hydrocarbons (PAHs)

3.12 PFOA in articles and latex printing inks

PFOA has been used to provide water resistant properties to textiles. They are in articles in a concentration equal to or above 25 ppb (0.025 mg/kg) of PFOA including its salts or 1 000 ppb (1 mg/kg) of one or a combination of PFOA-related substances

PFOS is restricted under the **Persistent Organic Pollutants regulations 2019/1021 (EU) and amendments**

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1. Nonylphenol ethoxylates (NPEO)

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Nonylphenol ethoxylates (NPEO)	9016-45-9 + various	100 mg/kg	EN ISO 18254-1:2016 (textile) EN ISO 18218-1:2015 (leather)	Natural fibres and composites with natural fibres.	NPEOs are used as wetting agents and emulsifiers in silk, linen, cotton and leather Restricted in Washable Textile products

2. Azo Dyestuffs (which by reductive cleavage of one or more azo-groups may release one or more amines listed below)

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
4-Aminobiphenyl	92-67-1	20 mg/kg	Textile material: BS EN ISO 14362-1:2017 In every case where 4-aminoazobenzene is detected (BS EN ISO 14362-3:2017) Leather material: BS EN ISO 17234-1:2015 In cases where 4-aminoazobenzene is	Dyed textile and leather materials	
Benzidine*	92-87-5				
4-Chlor-o-toluidine	95-69-2				
2-Naphthylamine	91-59-8				
o-Aminoazotoluene	97-56-3				
2-Amino-4-nitrotoluene	99-55-8				
p-Chloraniline	106-47-8				
2,4-Diaminoanisoole	615-05-4				
4,4'-Diaminodiphenylmethane	101-77-9				



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3,3'-Dichlorbenzidine	91-94-1	detected BS EN ISO 17234-2:2011		
3,3'-Dimethoxybenzidine	119-90-4			
3,3'-Dimethylbenzidine	119-93-7			
3,3'-Dimethyl-4,4'-diaminodiphenylmethane	838-88-0			
p-Cresidine	120-71-8			
4,4'-Methylen-bis(2-chloraniline)	101-14-4			
4,4'-Oxydianiline	101-80-4			
4,4'-Thiodianiline	139-65-1			
o-Toluidine	95-53-4			
2,4-Toluylendiamine	95-80-7			
2,4,5-Trimethylaniline	137-17-7			
2,4-Dimethylaniline (2,4-xylidine)	95-68-1			
2,6-Dimethylaniline (2,6-xylidine)	87-62-7			
2-Methoxyaniline (= o-anisidine)	90-04-0			
4-Aminoazobenzene *	60-09-3			

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3. Chlorinated Organic Carriers/Chlorobenzenes

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
α,α,α -trichlorotoluene; benzotrichloride	98-07-7	<1 mg/kg	DIN 54232:2010	Synthetic fibres and composites with synthetic fibres, blends of wool with Polyester	used in batch dyeing of Polyester and Polyester composite fibres
α -chlorotoluene; benzyl chloride	100-44-7				
$\alpha, \alpha, \alpha, 4$ -tetrachlorotoluene; p- chlorobenzotrichloride	5216-25-1				

4. Chlorinated Paraffins

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Short chain (C10-C13) SCCPs	85535-84-8	1000 mg/kg	ISO 18219:2015	Leather, prints and synthetic leathers	

5. Chlorinated Phenols

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Pentachlorophenol	87-86-5	0.5 mg/kg	KOH extraction Analysis § 64 LFGB B 82.02-08 or BS EN ISO 17070:2015 GC/MS	Leather, silk, Polyester	leather preservative, to be found also in printed silk, printed Polyester from India as well as in dyed Polyester in dark shades



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6. Dimethyl formamide (DMFa)					
RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Dimethylformamide (DMFa)	68-12-2	3000 mg/kg	ISO/TS 16189: 2013	PU	

7. Dimethyl fumarate (DMFu)					
RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Dimethyl fumarate (DMFu)	624-49-7	0.1 mg/kg	ISO/TS 16186: 2012	Leather	An fungicide agent which may be used in sachets in packaging to prevent the buildup of mould, especially during shipping.

8. Disperse Dyes and other dyestuffs					
RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Disperse blue 1	2475-45-8	50 mg/kg	DIN 54231:2005	Synthetic fibres and blends with synthetic fibres, cellulose acetate	Disperse dyes can be found in synthetic fibres, especially Polyester and are more common in dark fabrics
C.I. Basic Red 9	569-61-9				
C.I. Basic Violet 3	548-62-9				

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9. Dyes - Navy Blue

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Component 1: C39H23ClCrN7O12S.2Na	118685-33-9	50 mg/kg	DIN 54231:2005	Textile	Navy blue colorants which are regulated and prohibited from use for dyeing of textiles. Colour Index 611-070-00-2
Component 2: C46H30CrN10O20S2.3Na	Not specified			Textile	

10. Flame Retardants

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Tris-(2,3-dibromopropyl)-phosphate (TRIS)	126-72-7	10 mg/kg each	BS EN ISO 17881-2:2016	Textiles & plastics	Findings are rare Flame-retardant chemicals which are included in this class are rarely used.
Tris(aziridinyl)-phosphine oxide (TEPA)	545-55-1				
Tris(2-chloroethyl)phosphate (TCEP)	115-96-8				
Bis(2,3-dibromopropyl) phosphate (BDBPP)	5412-25-9				
Trixylophosphate	25155-23-1				



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Bis(2,3-dibromopropyl) phosphate (BDBPP)	5412-25-9	BS EN ISO 17881-1:2016		
Trioxylphosphate	25155-23-1			
Polybromobiphenyls (PBB)	59536-65-1			
Octabromodiphenyl Ether	32536-52-0			
Tetrabromodiphenyl ether (Tetra BDE)	40088-47-9			
Pentabromodiphenyl Ether	32534-81-9			
Hexabromodiphenyl ether (Hexa BDE)	36483-60-0			
Heptabromodiphenyl ether (Hepta BDE)	68928-80-3			
Decabromodiphenyl Ether	1163-19-5			
Hexabromocyclododecane	3194-55-6			
Tetrabromobisphenol A (TBBP A)	79-94-7			
2,2-bis(bromomethyl)-1,3-propanediol (BBMP)	3296-90-0			

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11. Formaldehyde

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Formaldehyde	50-00-0	Textiles with direct skin contact 75 mg/kg	BS EN ISO 14184-1	Natural fibres and composites with natural fibres	Formaldehyde resins are commonly used to suppress wrinkling and shrinking or for pleating (plissees)
		Leather: 75 mg/kg	BS EN ISO 17226-1	Leather	used as preservative

12. Metals - Extractable

RESTRICTED SUBSTANCE	CAS NUMBER	LIMIT VALUE Adults	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Arsenic	7440-38-2	1.0 mg/kg	Textiles: BS EN 16711-2:2015 Leather: DIN EN ISO 17072-1:2017	Textiles/ Footwear	
Cadmium	7440-43-9	1.0 mg/kg			
Chromium VI (Chromate)	18540-29-9	1.0 mg/kg			
Lead	7439-92-1	1.0 mg/kg			

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13. Metals - Total

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Lead	7439-92-1	Substrate - 100 mg/kg Surface coatings - 90 mg/kg	EN 16711-1: Total digestion method and analysis with ICP		all articles.
Cadmium	7440-43-9	100 mg/kg			all articles

14. Metals - Others

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Chromium VI (Chromate)	18540-29-9	3 mg/kg	ISO 17075-1: 2017 with ageing (80°C for 24 hours at less than 5% RH)	Leather	Leather (after aging)

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Nickel release	7440-02-0	0,88 µg/cm ² /week (non piercing item); 0.35 µg/cm ² /week (piercing item)	BS EN 1811:2011+A1:2015 BS EN 12472:2020	Metal parts	Metal components and accessories, jewellery with prolonged skin contact
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15. Organotin Compounds

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Tributyl tin (TBT)+compounds	various	1000 mg/kg	ISO/TS 16179:2012	PU items, plastic accessories	Prints, adhesives, PU, silicon (zipper pullers) lacquers
Dibutyl tin (DBT)	various	1000 mg/kg			
Diocetyl tin (DOT) + compounds	various				
Triphenyltin (TPhT) compounds	various				

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16. Perfluorinated Compounds

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Perfluoro octane sulphonate (PFOS) and related substances	Various	1 µg/m ²	CEN/TS 15968:2014	stain and/or water repellent finished textiles and leathers	Test only necessary if the product has DWR finish
Perfluoro octanoic acid (PFOA) and related substances	Various				

17. Phthalates

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Dibutylphthalate (DBP)	84-74-2	500 mg/kg each or sum of all 1000 mg/kg	Textiles with prints and EN ISO 14389 all other articles: solvent extraction with toluene-GC/MS	PU and PVC plastics, prints, accessories	Widely used in prints and coatings and in plasticised polymers
Benzylbutylphthalate (BBP)	85-68-7				
Bis-(2-ethylhexyl)phthalate (DEHP) *	117-81-7				
Di-n-octylphthalate (DNOP)	117-84-0				
Diisononylphthalate (DINP)	28553-12-0				

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Diisodecylphthalate (DIDP)	26761-40-0			
Di-iso-butylphthalate (DIBP)	84-69-5			
1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters (DIHP)	68515-42-4			Not used as frequently as other phthalates
1,2-Benzenedicarboxylicsäure, di-C6-8-branched alkyl esters, C7-rich (DHNUF)	71888-89-6			
Bis(2-methoxyethyl)phthalate	117-82-8			
Diisopentylphthalate	605-50-5			
n-Pentyl-isopentylphthalate	776297-69-9			
1,2-Benzenedicarboxylic acid, dipentylester, branched and linear	84777-06-0			
1.2-benzenedicarboxylic acid, di-C6-C10 alkyl esters	68515-51-5			
1.2-benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters	68648-93-1			

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Dipentylphthalate (DPP)	131-18-0			
Dihexylphthalate (DnHP)	84-75-3			

18. Polycyclic Aromatic Hydrocarbons (PAH)

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Benzo[a]anthracene	56-55-3	each PAH: 1,0 mg/kg	ZEK 01.4-08 (= AfPS GS 2014:01 PAK)	Rubber, black plastics, black lacquered items, black synthetic fibres	May be found in rubber, plastics, lacquers and coatings. PAHs are often found in the outsoles of footwear and in printing pastes for screen prints.
Benzo[a]pyrene	50-32-8				
Benzo[b]fluoranthene	205-99-2				
Benzo[e]pyrene	192-97-2				
Benzo[j]fluoranthene	205-82-3				
Benzo[k]fluoranthene	207-08-9				
Chrysene	218-01-9				
Di benz[a,h]anthracene	53-70-3				

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19. Volatile Organic Compounds (VOCs)

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Benzene	71-43-2	5 mg/kg	CEN ISO/TS 16189:2013	PU and items with glues/adhesives.	
Dimethylacetamide (DMAC)	127-19-5				
Toluene	108-88-3				
Xylenes (meta-, ortho-, para-)	1330-20-7				
	108-38-3				
	95-47-6				
	106-42-3				

20. Other Substances

RESTRICTED SUBSTANCE	CAS NUMBER	REQUIREMENT	TEST METHOD	MATERIALS OF CONCERN	COMMENTS
Quinoline	91-22-5	50 mg/kg	DIN 54231:2005	Used in the manufacture of dyes	

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The REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) Regulation.

The REACH Regulation has other requirements for substances in articles which are identified as **substances of very high concern (SVHC)**. These SVHCs are detailed in Annex XIV of the REACH Regulation 1907/2006. This list is updated periodically and suppliers must be aware of the requirements

The Very Group (TVG) requires that the substances listed in Annex XIV should not be used in the manufacture of any of its products.

However, if any of the substances are used, The Very Group (TVG) may be required to meet notification requirement and/or provide consumers with information to ensure the safe use of the product and may also be required to provide consumers safety information about the SVHC when requested.

If any SVHC is used in the production of any The Very Group (TVG) product, the supplier MUST advise of the presence in the article to ensure that The Very Group (TVG) is in a position to fulfill any obligations.