

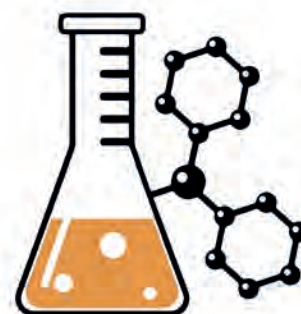
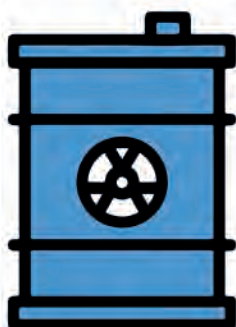
KNOW YOUR MRSL FROM YOUR RSL

By Georgina Mawer, lead chemical and regulatory advisor and Chem-MAP technical manager, Eurofins BLC Leather Technology Centre Limited



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Does your chemical management focus on both MRSL and RSL? Georgina Mawer from Eurofins BLC Leather Technology Centre explains the importance of the use of restricted substance lists in garment and textile manufacturing and when and how you should use an MRSL and an RSL.



Both an MRSL and an RSL are lists of restricted substances. Brands, retailers, and manufacturers need to use these lists in order to demonstrate effective chemical management in their supply chain. However, there can be some confusion about when and how the lists are used.

MANUFACTURING RESTRICTED SUBSTANCES LIST

MRSL stands for Manufacturing Restricted Substances List and provides brands, retailers, suppliers, and manufacturers with acceptable limits of restricted substances in chemical formulations that are used in the manufacture of materials compliance.

An MRSL is a tool to regulate the chemical formulations used to process the raw materials that go into finished products. The regulation of chemical formulations upstream through an MRSL protects workers, consumers, and the environment. Adhering to an MRSL can also protect brands and retailers from any potential negative publicity on product safety.

RESTRICTED SUBSTANCES LIST

RSL stands for Restricted Substances List and is often used as a chemical checklist when testing finished products for the presence of restricted substances. An RSL does not have any involvement with the manufacturing process and only applies to finished articles and materials. As such, it may be referred to as a PRSL (Product Restricted Substance List).

An RSL is used as a tool to aid regulatory compliance to product safety standards such as REACH, CPSIA, California Proposition 65, China Guobiao Standards, and so on. Finished products should undergo chemical testing as part of a structured due diligence testing programme to ensure compliance with regulations and the brand or retailer's RSL.



Softlines & Leather

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KEY DIFFERENCES BETWEEN AN MRSL AND AN RSL

There are several differences between both the content of an MRSL and RSL and when they should be used for chemical compliance.

For example, a Manufacturing Restricted Substances List:

- applies to the testing of chemical formulations;
- helps to prevent harmful levels of chemicals from entering the supply chain;
- and is used to regulate the safety of chemical formulations.

Restricted substance limits are set much higher in MRSLs than in RSLs as these limits are applied to chemical formulations. Chemicals formulations used in manufacturing and processing contain much more concentrated levels of chemicals, which become diluted during their use in wet processing.

The ZDHC MRSL is often used as an industry benchmark by ZDHC-accepted certification standards such as Chem-MAP, however, companies can develop and use their own MRSLs.

A Restricted Substance List, on the other hand:

- applies to the testing of materials and finished products;
- protects consumers and end users of materials and products from harmful levels of chemicals;
- and is used for product safety and chemical compliance.

Restricted substance limits are lower in RSLs than in MRSLs as they only apply to the chemical content of finished products. RSL limits can also vary and are driven by legislation, eco labels, and brand/retailer decisions (which may go beyond compliance).

Brands and retailers often develop their own RSLs or use RSLs set by testing laboratories such as Eurofins | BLC.

ZDHC MRSL

ZDHC (Zero Discharge of Hazardous Chemicals) is an organisation dedicated to eliminating hazardous chemicals and implementing sustainable chemicals in



the leather, textile, and synthetics sectors. ZDHC has created a multi-stakeholder programme that is supported by brands, retailers, and manufacturers around the world with the aim of implementing responsible chemical management.

The ZDHC MRSL is a list of restricted substances that has been developed by ZDHC and is commonly used as a standardised checklist of substances to test against.

DOES THE MRSL REPLACE THE NEED FOR AN RSL?

No. RSLs remain extremely important tools for brands and retailers to ensure that they are providing product that is fit for the intended user and they make an important commitment to stakeholders about their responsibility to consumer safety. Such commitments on restricted chemicals remain fundamental to product safety management and are extremely important to guard against potential consumer safety issues and brand integrity.

While there is some overlap between the MRSL and many brands' RSLs, not all RSL-listed substances feature in the MRSL. The MRSL is focused on eliminating the intentional use of certain substances during manufacturing processes. There are many substances restricted at RSL level that do not need to be banned from intentional use, but the limits of the substances in finished materials/product must be controlled in order to satisfy regulatory requirements.

WHY SHOULD MANUFACTURERS TEST TO AN MRSL?

MRSL testing provides an indication of compliance of chemical formulations to a specified MRSL, which normally occurs upstream in the supply chain at the raw material input stage. Chemical companies and manufacturers of raw materials would normally carry out MRSL testing to the

ZDHC MRSL or to customer-specified MRSLs. As MRSL testing takes place further upstream in the supply chain, it helps to prevent harmful chemicals from entering raw materials and consumer products. By carrying out MRSL testing, your business is taking a vital step towards responsible chemical management.

Chemical companies and manufacturers can test to the ZDHC MRSL through ZDHC-accepted certification standards such as Chem-MAP, which is a set of chemical verification systems for the entire supply chain. Each system is tailored to the individual chemical management needs of chemical formulators, manufacturers, brands, and retailers and works together as part of a holistic supply chain system to protect consumers, workers, and the environment from harmful chemicals.

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