

REACH restrictions concerning textiles and leather articles

In this document we list textile specific restrictions of substances that are listed in Annex XVII of the [REACH](#) regulation. We want to inform you that this list may not be complete and that the official REACH regulation is the only legally binding document. The entire Annex XVII with further substance specific information can also be found on [ECHA CHEM](#).

Many entries in the Restriction List (Annex XVII) cover articles. These may address types of textiles and leather articles, even if these are not explicitly mentioned.

The following entries in the Restriction List are specific to textiles. These entries state that these substances “Shall not be used in textile articles, such as garments, undergarments and linen, intended to come into contact with the skin.”

Entry	Substance name
4	(2,3 dibromopropyl) phosphate
7	Tris(aziridinyl)phosphin oxide
8	Polybromobiphenyls, Polybrominated biphenyls (PBB)

The following entries in the Restriction List (Annex XVII) restrict substances in relation to textiles and/or leather articles:

Entry	Substance name
18	Mercury compounds
20 (paragraph 6)	Organostannic compounds , dioctyltin (DOT) compounds
23 (paragraph 6)	Cadmium and its compounds
43	Azocolourants and Azodyes
46a	Nonylphenol ethoxylates
47 (paragraphs 5-7)	Chromium VI compounds
72 (paragraph 1)	33 substances which are classified as carcinogenic, mutagenic or toxic for reproduction
76 (paragraph 3)	N,N-dimethylformamide
79 (paragraphs 1-2)	undecafluorohexanoic acid (PFHxA), its salts and related substances

Guideline documents on specific entries

The available guideline documents with their respective restriction entries are listed as follows:

Entry 72 (Substances classified as CMR 1A or 1B): [Explanatory Guide on the Restriction on CMRs 1A and 1B in Textiles and Clothing](#)

Entry 76 (DMF): [How to comply with REACH Restriction 71, 76, 80 and 81; guideline for users of the aprotic solvents NMP, DMF, DMAC, and NEP](#)

Entry 79 (PFHxA, its salts and related substances) [Explanatory guide on the restriction of PFHxA, its salts and related](#)

ECHA Q&As on textile specific REACH restrictions

ECHA lists a database with questions and answers about all their processes and regulations. Here we show some Q&A's related to textile specific REACH restrictions. The Q&As can also be found on [ECHA's website](#) with their specific ID number.

ID1312

Question: Is the list of restricted items in entry 43 (Azocolourants and azodyes) of Annex XVII to REACH concerning azocolourants and azodyes exhaustive?

Answer: No. The use of the words “such as” makes clear that the list of items mentioned in paragraph 1 of entry 43 of Annex XVII to REACH is a non-exhaustive list of examples of items covered by this restriction (clothing, footwear, textile toys etc.).

ID1313

Question: Do sofas and chairs (e.g. garden chairs/sun loungers' type) fall under the scope of the restriction entry 43 (Azocolourants and azodyes) of Annex XVII to REACH?

Answer: Yes. Garden furniture made of textile or leather is covered by entry 43 as people who use them can be in light clothing (even in bathing suits or bare) and “direct and prolonged contact with human skin” is very likely. There is even a direct reference to chair covers in the list of examples of articles covered by the restriction.

ID1183

Question: The restriction indicated in entry 43(3) (Azocolourants and azodyes) applies only to the placing on the EU market of substances or mixtures containing the azodyes listed in Appendix 9 at a concentration exceeding 0.1% by weight, and to the use of such substances/mixtures within the EU. Does the restriction therefore not apply to imported articles which have been dyed with the azodyes listed in Appendix 9?

Answer: Entry 43(3) of Annex XVII restricts the placing on the market of substances and mixtures containing over 0.1% of the azodyes listed in Appendix 9, when they are intended for colouring textile and leather articles, and also the actual use of the substance or mixture for that purpose. Therefore, the presence of these substances in imported articles is not restricted.

However, pursuant to paragraphs 1 and 2 of the restriction, if an azodye in Appendix 9 releases one or more of the aromatic amines listed in Appendix 8 in a concentration above 30 mg/kg (0,003 % by weight, it cannot be used in textile and leather articles which may come into direct and prolonged contact with human skin or the oral cavity (such as those listed in paragraph 1). Those textile and leather articles cannot be placed on the market unless they comply with that concentration limit.

ID1802

Question: What is the meaning of the expressions ‘textile articles which can reasonably be expected to be washed in water’ (paragraph 1) and ‘new textile articles produced exclusively from recycled materials’ (paragraph 2) in the context of the entry 46a on nonylphenol ethoxylates?

Answer: The expression ‘textile articles which can reasonably be expected to be washed in water’ relates to the use of care indications on the label attached to the textile article. Textile articles with care instructions that exclude washing in water and require dry cleaning are, in principle, not covered by the restriction in paragraph 1 of entry 46a.

However, care instructions should not be used to circumvent the restriction; this would for example be the case of a label for dry cleaning where there is no need for dry cleaning. ‘New textile articles produced exclusively from recycled textiles’ means that only recycled textiles materials must have been used to produce new textile articles, otherwise the exemption does not apply. If, for example, virgin textiles materials have been used together with recycled ones, the exemption does not apply.

ID1805

Question: Does the restriction in entry 72 (Substances classified as CMR 1A or 1B) on specific substances which are carcinogenic, mutagenic and toxic to reproduction apply to clothing or related accessories such as rainwear, accessories or footwear mainly made of plastic material or synthetic leather?

Answer: Yes. The European Commission has published an [explanatory guide](#) concerning the restriction under Entry 72 of Annex XVII to REACH aiming to clarify the scope of the articles intended to be covered by the restriction. It provides a non-exhaustive list of articles which are considered to be within the scope of the restriction and those that are not. The raw material of articles is not a determining factor for the application of the restriction, but rather the nature of the article in question, i.e. is it clothing, a related accessory, a textile other than clothing which under normal or reasonably foreseeable conditions of use comes into contact with human skin to an extent similar to clothing or footwear. Raincoats are explicitly mentioned as an example of articles covered by the restriction in the explanatory guide. According to paragraph 3 of the entry, the restriction does not apply to clothing, related accessories, footwear, or parts of clothing, related accessories or footwear, made exclusively of natural leather, fur or hide. It does not apply either to non-textile fasteners and non-textile decorative attachments.

ID1806

Question: To which phthalates does entry 72 (Substances classified as CMR 1A or 1B) apply and what concentration limits of phthalates are applicable to clothing and related accessories, other textiles and footwear placed on the market?

Answer: Appendix 12 of Annex XVII which is referred to in entry 72 includes five phthalates, i.e. 1,2-benzenedicarboxylic acid; di-C 6-8-branched alkylesters, C 7-rich, bis(2-methoxyethyl) phthalate, diisopentylphthalate, di-n-pentyl phthalate (DPP) and di-n-hexyl phthalate (DnHP).

Clothing and related accessories, textiles other than clothing which under normal or reasonably foreseeable conditions of use come into contact with human skin to an extent similar to clothing and footwear cannot contain a total concentration equal or greater than 1000 mg/kg of the phthalates specified in the Appendix 12, considered individually or in combination with other phthalates listed either in i) Appendix 12, or ii) elsewhere in Annex XVII, if classified as carcinogenic, mutagenic or toxic to reproduction (CMR), category 1A or 1B in Part 3 of Annex VI to Regulation (EC) No 1272/2008.

Examples of other phthalates in Annex XVII include those listed in entry 51 (bis (2-ethylhexyl) phthalate (DEHP), benzyl butyl phthalate (BBP), dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP)). These substances are classified as toxic to reproduction

category 1B, and therefore fulfil the criteria of the restriction. Thus they cannot be present in the clothing and related accessories, other textiles and footwear placed on the market if, in combination with the phthalates listed in Appendix 12, the total phthalate concentration, measured in homogeneous material, is equal to or greater than 1000 mg/kg. Note also that Appendices to entries 28 to 30 provide lists of substances classified as CMRs, category 1A or 1B to which the restrictions apply. The above considerations are relevant also to the phthalates included in those Appendices.

ID1920

Question: Which are the analytical test methods recommended to check compliance of REACH restrictions?

Answer: ECHA has developed a '[Compendium of Analytical Methods](#)' to provide a ready reference of some available analytical methods that authorities or industry may use in order to assess the compliance of chemicals manufactured, used or placed on the Union market with the restrictions set forth in Annex XVII to REACH. If a test method is specified in the legal text, it has to be adhered to. [...]

Concerning the Restriction on CMRs 1A and 1B in Textiles and Clothing, a list of available analytical is available in the document [Explanatory Guide on the Restriction on CMRs 1A and 1B in Textiles and Clothing](#).

Lastly, information on test methods is available in each of the background documents accessible in the [Registry of restriction intentions](#).

Q&As on the microplastics restriction (entry 78 of Annex XVII) regarding textiles

[Entry 78 of Annex XVII](#) restricts the placing on the market of synthetic polymer microparticles (commonly known as “the microplastics restriction”). The Commission has prepared [Explanatory Guides](#) to help stakeholders and EU countries implement the new rules, including questions and answers (Part II) explaining whether textiles are within the scope of the restriction and how the restriction impacts textile and fabric manufacturers. The following Q&As can be found in Chapter 19 of Part II of the Explanatory Guide.

ID 19.1

Question: What does the restriction mean for fabric manufacturers and wedding dress designers who are currently producing dresses and fabrics with SPM-containing glitter, such as wedding dresses, costumes, festive clothes and footwear?

Answer: Glitter affixed to fabric is considered as an integral part of the fabric, which is an article (based on [ECHA guidance on requirements for substances in articles](#)). Glittered fabric is therefore outside the scope of the restriction and can continue being placed on the market for any use, including professional use by wedding dress designers.

The placing on the market of SPM-containing glitter for use at industrial sites to produce glittered fabric is allowed (permanent derogation under Paragraph 4(a)), but comes with related IFUD (Paragraphs 7 and 10) and reporting obligations (Paragraph 11).

The placing on the market of SPM-containing glitter for use to produce glittered fabric outside of industrial sites (e.g. artisanal production of glittered fabric) is not derogated under Paragraph 4(a) and is only possible in the case that the SPM in the glitter are derogated under Paragraph 5 because, for example, they are permanently incorporated into a solid matrix (such as a resin layer or film) during intended end use, i.e. when placed on the fabric.

To note that sequins are considered as articles and are therefore out of the scope of the restriction. See also Q&A 18.3.

ID 19.2

Question: Does the unintentional breakdown of synthetic fibres (e.g. polyester, nylon etc.) from garments/textiles during mechanical processes like washing, fall within the scope of the restriction?

Answer: The restriction bans the placing on the market of SPM on its own, or intentionally present in mixtures in concentration $\geq 0.01\%$ w/w to confer a wanted property ('sought-after characteristic') to the mixture. Synthetic fibres released from garments during washing are not in the scope of the restriction because the released fibres are not placed on the market, nor are they conferring a sought-after characteristic to a mixture.

The restriction does not ban the placing on the market or the use of articles containing SPM. Therefore, the fact that SPM may be released from articles during the normal use of the article does not prevent that article from being placed on the market.

ID 19.3

Question: Does the restriction apply to SPM in coatings affixed to textiles?

Answer: SPM affixed to textiles, such as in coatings, are considered as an integral part of those articles and therefore outside the scope of the restriction.

ID 19.4

Question: Will bridal fashion shops still be allowed to sell their stocks of garments with SPM-containing glitter after the restriction comes into force?

Answer: Retailers can continue to sell their stocks of garments with SPM-containing glitter (regardless of whether they have been bought before the entry into force of the restriction on 17 October 2023) because garments with SPM-containing glitter are articles and therefore outside the scope of the restriction. Bridal fashion shops placing on the market glittered fabrics will not be affected because glittered garments or footwear are outside the scope of the restriction. See also Q&A 19.1.

ID 19.5

Question: What are the measurements used to estimate the release of SPM from non-woven textiles into the environment?

Answer: Any SPM that may be released from non-woven textiles are outside of the scope of the restriction and their releases do not have to be reported.