Restricted Substances List (RSL)

Soft & Hard Lines

VERSION 02.24

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INTRODUCTION & SCOPE

The White Company Restricted Substances Policy has been created with the aim to reduce the use and impact of hazardous substances in our supply chain. This policy establishes The White Company's restricted substances list (RSL) and ways for controlling and monitoring these substances.

This RSL is applicable to all The White Company and Little White Company products in throughout every stage of their design, manufacture, commercialization and packaging.

The Restricted Substances Policy's main objectives are to:

- Ensure that our products comply with the most stringent global legislation.
- Provide guidelines for testing the materials that make up our products and packaging.
- Allow The White Company to correctly inform our global stakeholders about any restricted chemicals in our products and packaging.

COMPLIANCE

All The White Company and Little White Company products must comply with the requirements in this policy. Including, but not limited to, finished products, fabrics, pieces, finishes, chemical products and other components. This document is intended to provide our suppliers with guidance and requirements for restricted substances testing. With each update we intend to give enough lead time in which to understand the changes and allow our suppliers to take the necessary steps to ensure compliance. However, there may be special circumstances, such as new legislation, that results in a shorter than average time for compliance.

Suppliers are responsible for making sure that materials and finished products meet the defined limits for chemical substances, even when they are not obligated to submit test reports.

- RSL test results are valid for 12 months from the reporting date.
- The White Company reserves the right to request tests of any material at any time.
- After test reports have been received and approved no changes in the process, material composition or chemical substances are permitted. Any approved changes will require retesting to confirm RSL compliance.
- Due to the ever-changing nature of global legislation this document does not supersede existing country, national and state legislations and directives where they apply. See appendix for further information.
- Suppliers must communicate TWC's RSL upstream to subcontractors and suppliers. All stakeholders in the supply chain must also understand, and comply with, the requirements of the RSL.
- In the event any rejected goods need to be recalled or returned to the Supplier these will be managed in line with The White Company Supplier Manual Section 3 Terms and Conditions of Trade.
  Please refer to The White Company Supplier Manual - Section 3 and 4 for compliance procedures.

RESPONSIBILITIES

DIRECT SUPPLIERS & TIER 1 FACTORIES

Our direct suppliers are responsible for ensuring that all The White Company are free of restricted substances and will be held liable in case of loss or damages in case restricted substances are found in any products exceeding the limitations set out within the RSL. The supplier and 1st tier factories must ensure that all products supplied to The White Company conform to all relevant legislation as well as additional limitations on restricted substances imposed by The White Company which may go over and above the legal minimums. Products must be tested and comply with the RSL guidelines, in addition to any supplementary requirements imposed by law, local authorities, or regulations related to environmental and product safety.
They must also:

- Submit a yearly Declaration of Compliance to the compliance team at The White Company, signed by a legal representative.
- Proactively submit the test reports to The White Company technologist, respecting the 12-month validity period and in English. Test reports to be available within 48 hours on request.
- Immediately inform The White Company team of any difficulty in meeting the standards set out in the RSL or the SVHC list (Appendix B).
- Immediately notify The White Company team if test reports indicate the presence of any of the substances referred to in the RSL. Or if the article contains a substance on the SVHC list above a concentration of 0.1% (w/w).
- Proactively submit to The White Company a report of actions taken to correct any deviations from the RSL.
- Maintain records of the Material Safety Data Sheets (MSDS) for resins, adhesives, solvents and paints used in the manufacturing process; to be available upon request.

RESPONSIBILITIES

THE WHITE COMPANY

The White Company compliance team will stay up to date on any changes in legislation regarding restricted substances and their testing methods and must make sure all suppliers are similarly informed. However, this does not relieve suppliers of their responsibility to monitor and comply with all relevant legal requirements for the products they supply.

In addition, The White Company must:

- Maintain a communication channel with the compliance and technical teams, to answer questions and provide technical support.
- Update this Restricted Substances policy at least once per year, and ensure this is shared with suppliers, in line with the requirement for yearly Declaration of Compliance.

RESTRICTED SUBSTANCES LIST & RESPONSIBILITIES SIGNED

DIRECT SUPPLIERS & TIER 1 FACTORIES

In line with the yearly declaration required of The White Company RSL; I have read and understood the Restricted Substances List and the terms and conditions (Responsibilities) outlined above:

	COMPANY NAME	PRINT NAME	SIGNATURE	DATE
DIRECT SUPPLIER / AGENT				
TIER 1 FACTORY				

RESTRICTED SUBSTANCES LIST

The below RSL indicates chemical substances considered restricted across global legislations with specific emphasis on UK, EU, USA and UAE requirements, including General Product Safety, REACH and Prop-65. More clarification on these and links to the most up to date legislation can be found in the appendix.

Due to the nature of SVHC and these legislations this is not an exhaustive list. It is the supplier's responsibility to remain up to date with any changes to the legislation, including changes to the permitted limits and/or the addition of new chemicals, in-between The White Company's annual updates. Please see appendix B for further information on SVHC.

The RSL includes chemicals identified through industry testing and research. These substances have been listed alongside:

- The Country of Sale legislations and restrictions. Including the specific test methods required.
- The White Company Limit – This is the maximum accepted concentration in the material or final product based.
- Risk matrix of the chemical's presence in material types.
- Basic information of the reason for concern and the potential origins of substances.

The White Company - Restricted Substances List

RSL (Restricted Substance List): The White Company RSL applies to all fabrics, components, products and packaging. The RSL details the global requirement for restricted substances and respective limits in finished goods. Increasingly there will be a need to apply chemical tests in production, and more of these may become mandatory in future revisions. Suppliers not already doing so should begin to assess their ability to evidence compliance to The White Company RSL through testing or through other means. If you become aware that any Product(s) may or do contain any restricted substance(s), please notify The White Company Compliance team immediately.

KEY
HIGH RISK - Widely used and frequently detected
MEDIUM RISK - Detected occasionally
LOW RISK

KEY:
C - Carcinogenic
CO - Contamination
B - Bio accumulative
ED - Endocrine Disruptor - Irritant
M - Mutagenic
R - Reprotoxic
S - Sensitisation
T - Toxic
VP - Very Persistent

SUBSTANCE	REGULATIONS				THE WHITE COMPANY REQUIREMENTS	APPLICABLE MATERIALS										POTENTIAL USES SUMMARY	EXPOSURE & HAZARD			
	COUNTRY	LEGISLATION / REGULATION	TEST METHODS	LEGISLATION REQUIREMENTS		LEATHER	NATURAL TEXTILE	SYNTHETIC TEXTILE	PLASTIC (inc PU/PVC)	RUBBER	METAL	PAPER / CARD	WOOD	GLASS / CERAMICS	MIXTURES		CONSUMER HEALTH	WORKER HEALTH	ENVIRONMENT	COMMENTS
Arsenic Compounds	**UK & EU**	UK REACH Annex XVII Entry 19 REACH Annex XVII Entry 19	EN 16711-1:2015	≤ 1 mg/kg (Shall not be used in the preservation of wood)	**Test method:** EN 16711-1:2015 **Requirement:** ≤ 1 mg/kg (Shall not be used in the preservation of wood)							✔	✔			Arsenic is banned in textile production and the preservation of wood. However it can be found in cotton farming as a preservative, pesticide and defoliant.			VP T	
Asbestos	**UK & EU**	UK REACH Annex XVII Entry 6 REACH Annex XVII Entry 6	MDHS 39/4	Use Prohibited	**Test method:** MDHS 39/4 **Requirement:** Use Prohibited			✔	✔							Used to be used for finishing of materials, This is now prohibited.	C ED	C	T	Is known to cause cancer due to exposure.
Alkylphenols & Alkylphenol Ethoxylates(APEO, NPEO, OPEO)	**UK & EU**	REACH Annex XVII Entries 46 & 46a (as amended by Regulation (EU) No 2016/26) UK REACH Annex XVII Entries 46 & 46a	EN ISO 18218-1:2015 (leather) EN ISO 18218-2:2019 (leather) EN ISO 18254-1:2016 (textiles)	Textile materials: 100 mg/kg Leather and polymer materials: 1000mg/kg	**Test method** EN ISO 18218-1:2015 (leather) EN ISO 18218-2:2019 (leather) EN ISO 18254-1:2016 (textiles) **Requirement** Textile materials: 100 mg/kg Leather and polymer materials: 1000mg/kg	✔	✔	✔							✔	APEO/NPEO are auxiliary chemicals used in various industries. They are good emulsifiers and wetting agents and thus have been widely employed in different industrial and domestic detergents. They also co-formulants in pesticides and biocides.	T ED		VP T ED	NPEO is the biggest source of NP present in the environment. NP is a potent endocrine disrupter to the aquatic environment and can cause feminization in some male fish.
Azo Dyes	**UK & EU**	UK REACH Annex XVII Entry 72 REACH Annex XVII Entry 72	**Textile:** ISO 14362-1:2017 **Leather:** ISO 17234-1 **4-aminoazobenzene Confirmation:** **Textile:** ISO 14362-3:2017 **Leather:** ISO 17234-2	< 30 mg/kg (24 banned arylamines)	**Test method:** Textile: ISO 14362-1:2017 Leather: ISO 17234-1:2020 4-aminoazobenzene confirmation: Textile: ISO 14362-3:2017 Leather: ISO 17234-2:2011 **Requirement:** <30 mg/kg (24 banned arylamines - including 2, 4-xylidine &2, 6-xylidine)	✔	✔	✔								Azo dyes and pigments are colourants containing at least one azo bond (-N=N-) within the molecule. They are commonly used as colorant in textile and apparel industry.	C	C		Under basic chemical or enzymatic conditions, some azo dyes may release aromatic amines which are classified as carcinogens. These regulated Azo dyes should no longer be used in colouring textiles.
		UK REACH Annex XVII Entry 43 REACH Annex XVII Entry 43		< 30 mg/kg of each amine for dyed products in direct contact with the skin.																
	TURKEY	Turkish Official Gazette No. 28431 (Applies to all materials)		< 30 mg/kg (24 banned arylamines)																
	AU	Australian Competition and Consumer Commission Safety Guidance		< 30 mg/kg (24 banned arylamines)																
	INDIA	Environmental (Protection) Act		< 30 mg/kg (24 banned arylamines)																
	CHINA	Textile: GB 18401-2010 Leather: GB 20400-2006 Footwear: GB 25038-2010	**Textile:** GB/T 17592:2011 **Leather:** GB/T 19942:2019 **4-Aminoazobenzene confirmation:** **Textile:** GB/T 23344	**Textile:** 20 mg/kg; **Leather:** 30mg/kg;(23 banned arylamines) **Footwear:** 30 mg/kg																
Benzene (including index 601 Benzenes)	**UK & EU**	UK REACH Annex XVII Entry 72 REACH Annex XVII Entry 72	GC-MS Headspace	Benzene ≤ 5 mg/kg Benz[a]anthracene, Benz[e]acephenanthrylene, benzo[a]pyrene; benzo[def]chrysene, Benzo[e]pyrene, Benzo[j]fluoranthene, Benzo[k]fluoranthene, Chrysene, Dibenz[a,h]anthracene ≤ 1 mg/kg	**Test method:** GC-MS Headspace **Requirement:** Benzene ≤ 5 mg/kg Benz[a]anthracene, Benz[e]acephenanthrylene, benzo[a]pyrene; benzo[def]chrysene, Benzo[e]pyrene, Benzo[j]fluoranthene, Benzo[k]fluoranthene, Chrysene, Dibenz[a,h]anthracene ≤ 1 mg/kg		✔	✔	✔						✔	Benzene is found in crude oil and is a major part of gasoline. It's used to make plastics, resins, synthetic fibres, rubber lubricants, dyes, detergents, drugs and pesticides.	C M R	ED C S		Known skin and eye irritant. Suspected mutagenic and carcinogenic. Known to cause damage to organs through prolonged or repeated exposure.
		UK REACH Annex XVII Entry 5 REACH Annex XVII Entry 5		≤ 5 mg/kg in toys < 1000mg/kg in mixtures																
BPA Bisphenol A	**UK & EU**	UK REACH Annex XVII Entry 66 REACH Annex XVII Entry 66	Liquid Chromatography Mass-Spectrometer (LC/MS/MS)	200mg/kg	**Test method:** Liquid Chromatography Mass-Spectrometer (LC/MS/MS) **Requirement:** ≤ 0.6mg/kg (migration)				✔					✔	✔	Bisphenol A is commonly used as a monomer in plastic, epoxy resin and polycarbonate. e.g. plasticware for food.	R S ED			
		Food Contact Materials Regulation (EU) No 10/2011		≤ 0.6 mg/kg (migration)																
		Toy Safety Directive (2009/48/EC) as amended by (EU) 2019/1929 UK Toy Safety Regulations		0.1% per product, up to one tonne total																
	USA	California Prop 65		3 µ/d																
Bis(4-chlorophenyl) sulphone	**UK & EU**	UK REACH Annex XVII Entry 61 REACH Annex XVII Entry 61	EN 17137:2018	<1000mg/kg	**Test method:** EN 17137:2018 **Requirement:** < 1000 mg/kg				✔							Manufacture of chemicals, plastic products and rubber products			VP VB	
Cadmium(Total)	**UK & EU**	UK REACH Annex XVII Entry 23 REACH Annex XVII Entry 23	EN 1122:2001 EN 17072-2:2022 EN 16711-1:2015	**Plastic & Rubber:** < 100 mg/kg **Metal in jewellery:** < 100 mg/kg; **Surface coating on article:** < 1000 mg/kg	**Test method:** Non metal: EN 1122:2001 Metal: Acid digestion **Requirement:** Substrate: Plastic, metal in jewellery: < 100 mg/kg; Surface coating/paint on article: < 300 mg/kg				✔	Synthetic Rubber Medium Risk	✔		✔			Cadmium is a naturally occurring and abundant metal. In apparel, cadmium is used as a colourant and stabiliser in plastics, pigments and coatings. Cadmium can also be found in fertilisers, biocides and paints.	C	C		Heavy metals are suspected carcinogens and are banned from intentional use in textiles.
	USA	**CALIFORNIA**: SB929 - Jewellery for children under 6		< 300mg/kg																
		WASHINGTON: 'Children's safe products' - Washington State Law		< 40mg/kg																
Chlorotoluene's (α, α,α-trichlorotoluene; benzotrichloride, 4-tetrachlorotoluene; p-chlorobenzotrichloride, α-chlorotoluene; benzyl chloride)	**UK & EU**	UK REACH Annex XVII Entry 72 REACH Annex XVII Entry 72	EN 17137:2018	<1 mg/kg of p-chlorobenzotrichloride, benzotrichloride or benzyl chloride	**Test method:** EN 17137:2018 **Requirement:** < 1 mg/kg		✔	✔	✔							Could be present as a contaminant solvent based cleaning agents or as possible breakdown products from PVC	C	C	VP T ED	Substance is toxic if swallowed, comes in contact with skin or inhaled. May cause cancer. It is very toxic to aquatic life with long lasting effects and is suspected of causing genetic defects.

SUBSTANCE	REGULATIONS				THE WHITE COMPANY REQUIREMENTS	APPLICABLE MATERIALS										POTENTIAL USES SUMMARY	EXPOSURE & HAZARD			
	COUNTRY	LEGISLATION / REGULATION	TEST METHODS	LEGISLATION REQUIREMENTS		LEATHER	NATURAL TEXTILE	SYNTHETIC TEXTILE	PLASTIC (inc PU/PVC)	RUBBER	METAL	PAPER / CARD	WOOD	GLASS / CERAMICS	MIXTURES		CONSUMER HEALTH	WORKER HEALTH	ENVIRONMENT	COMMENTS
Chromium VI	**UK & EU**	UK REACH Annex XVII Entry 47 REACH Annex XVII Entry 47	ISO 17075-2: 2017 with ageing (80°C for 24 hours at less than 5% RH) EN ISO 17075-1:2017	None detected (< 3mg/kg)	**Test method:** ISO 17075-2: 2017 with ageing (80°C for 24 hours at less than 5% RH) **Requirement:** < 3 mg/kg	✔	✔									In textiles and apparel, chromium (VI) is usually associated with plastics, dyes and tanned leather - predominantly from the potassium dichromate two-bath tanning process.	C S	C S		Chromium (VI) is known to be carcinogenic and is corrosive to skin. Skin contact with certain chromium (VI) compounds can cause skin ulcers. Potassium dichromate (VI) and other chromium (VI) compounds are banned, and residues in chromium (III) tanning agents are restricted.
	GERMANY	18th Regulation on the amendment of the German ordinance on commodities of 3rd August 2010																		
	UK & EU	EU Toy Safety Directive (2009/48/EC) (For Children's Toys - Requirement for all Materials)	EN 71 - 3:2019+A1:2021	Category I Materials <0.02mg/kg Category II Materials <0.005mg/kg Category III Materials <0.053mg/kg	**TOYS ONLY:** **Test method:** EN 71 - 3:2019+A1:2021 **Requirement:** Category I Materials <0.02mg/kg Category II Materials <0.005mg/kg Category III Materials <0.053mg/kg	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔					
Chromium VI Compounds	**UK & EU**	UK REACH Annex XVII Entry 72 REACH Annex XVII Entry 72	EN ISO 17075-1:2017 Leather -- Chemical determination of chromium(VI) content in leather - Part 1: Colorimetric method EN ISO 17075-2 :2017 Leather -- Chemical determination of chromium(VI) content in leather - Part 2: Chromatographic method (in case of interferences as confirmation method) DIN 38405 Oekotex ST 201 M10ML102017	1 mg/kg (expressed as Cr VI that can be extracted from the material)	**Test method:** EN ISO 17075-1:2017 **Requirement:** 1 mg/kg	✔	✔	✔	✔							In textiles and apparel, chromium (VI) is usually associated with plastics, dyes and tanned leather - predominantly from the potassium dichromate two-bath tanning process.	C S	C S		Chromium (VI) is known to be carcinogenic and is corrosive to skin. Skin contact with certain chromium (VI) compounds can cause skin ulcers. Potassium dichromate (VI) and other chromium (VI) compounds are banned, and residues in chromium (III) tanning agents are restricted.
Creosotes, tar oils and distillates	**UK & EU**	UK REACH Annex XVII Entry 31 REACH Annex XVII Entry 31	In-house laboratory method	Use prohibited	**Test method:** In-house laboratory method **Requirement:** Use prohibited								✔		✔					
Diphenyl(2,4,6-trimethylbenzoyl)phosphine oxide	**UK & EU**	UK REACH Annex XVII Entry 61 REACH Annex XVII Entry 61	EN ISO 16189:2021	REACH candidate List <1000mg/kg	**Test method:** EN ISO 16189:2021 **Requirement:** <1000mg/kg			✔	✔	✔						Inks and toners, coating products, photo-chemicals, polymers, adhesives and sealants and fillers, putties, plasters, modelling clay	R	R		Toxic for reproduction
Dimethylacetamide (including NMP, DMAC & DMF)	**UK & EU**	UK REACH Annex XVII Entry 72 REACH Annex XVII Entry 72	EN ISO 16189:2021 (Modified) SATRA SOP CAT-067	<3000 mg/kg	**Test method:** EN ISO 16189:2021 (Modified) **Requirement:** <3000 mg/kg		✔	✔	✔		✔					Due to its good solvency properties it is used to dissolve a wide range of polymers. It is also used as a solvent for surface treatment of textiles, resins, and metal coated plastics or as a paint stripper.		R		Suspected of being reprotoxic. It could cause adverse effects on sexual function and fertility in adult males and females, as well as developmental toxicity in the offspring.
Dimethylformamide (DMFa)	**UK & EU**	UK REACH Annex XVII Entry 72 REACH Annex XVII Entry 72 & 76	EN ISO 16189:2021 EN 16778:2016 (For Gloves Only) SATRA SOP CAT-067	<3000mg/kg REACH candidate List <1000mg/kg	**Test method:** EN ISO 16189:2021 **Requirement:** < 1000mg/kg		✔	✔	✔						✔	DMFa is mainly used as solvent, and the manufacture of adhesives, synthetic leathers, fibres, and surface coatings.	R	R T S		DMFa is fatal if inhaled, is toxic if swallowed, causes severe skin burns and eye damage, may cause cancer, may damage fertility or the unborn child and may cause allergy or asthma symptoms or breathing difficulties if inhaled.
Dimethyl Fumarate (DMFu)	**UK & EU**	UK REACH Annex XVII Entry 61 REACH Annex XVII Entry 61	EN ISO 16186:2021 (Leather) EN 17130:2019 (Textiles)	<0.1 mg/kg	**Test method:** EN ISO 16186:2021 (leather) EN 17130:2019 (textiles) **Requirement:** <0.1 mg/kg	✔	✔	✔								DMFu is mainly applied in leather products to avoid deterioration during storage and transportation. It has been found in silica gel sachets and will evaporate onto the leather or other materials to protect them from mould.	S	S		Skin itching, irritation, redness and acute respiratory difficulties are symptoms of exposure to DMFu.
Disperse dyes (Allergenic and Carcinogenic)	**UK & EU**	UK REACH Annex XVII Entry 72 REACH Annex XVII Entry 72	DIN 54231: 2022 ISO 16373 Parts 1, 2 and 3:2014 SATRA SOP CAT - 459:2020	<50mg/kg of Disperse Blue 1, Basic Red 9 and Basic Violet 3	**Test method:** DIN 54231: 2022 **Requirement:** <30 mg/kg per restrced dye			✔								Disperse dyes are water-insoluble colorants that are mainly used for colouring polyester, nylon and cellulose acetate textile fibres.	S	S		Some of them possess irritant properties such as skin irritation, itchy, stuffy noses, sneezing and sore eyes. Restricted disperse dyes should no longer be used for the dyeing of textiles.
	UAE	UAE.S Consumer Product Safety		<30 mg/kg for Allergenic & Carcinogenic Dyes (Yellow 3) Carcinogenic Dyes (Acid Red 26, Basic Red 9) (Direct Black 38) (Direct Blue 6) (Direct Blue 28) (Disperse Blue 1)																
	GERMANY	§30 of the German Food and Feed Code (LFGB)		<75 mg/kg Allergenic Disperse Dyes (Blue 3, 7, 26, 35, 102, 106, 124) (Brown 1) (Orange 1, 3, 37/59/76) (Red 1, 11, 17) (Yellow 1, 9, 39, 49) Allergenic & Carcinogenic Dyes (Yellow 3) Carcinogenic Dyes (Acid Red 26, Basic Red 9) (Basic Violet 3, 14) (Direct Black 38) (Direct Blue 6) (Direct Red 28) (Disperse Blue 1) (Disperse Orange 11) Further Forbidden Dyes (Disperse Orange 149) (Disperse Yellow 23)														
Extractable Chromium	**UK**	General Product Safety	BS 6684:1989 Appendix A SATRA TM358:1999	≤ 250mg/kg (Chromium)	**Test method:** BS 6684:1989 Appendix A **Requirement:** <250 mg/kg	✔										Extractable chromium is usually associated tanned leather - predominantly from the potassium dichromate two-bath tanning process.	C S	C S		Chromium is known to be carcinogenic and is corrosive to skin. Potassium dichromate (VI) and other chromium (VI) compounds are banned, and residues in chromium (III) tanning agents are restricted.

SUBSTANCE	REGULATIONS				THE WHITE COMPANY REQUIREMENTS	APPLICABLE MATERIALS									POTENTIAL USES SUMMARY	EXPOSURE & HAZARD			
	COUNTRY	LEGISLATION / REGULATION	TEST METHODS	LEGISLATION REQUIREMENTS		LEATHER	NATURAL TEXTILE	SYNTHETIC TEXTILE	PLASTIC (inc PU/PVC)	RUBBER	METAL	PAPER / CARD	WOOD	GLASS / CERAMICS	MIXTURES		CONSUMER HEALTH	WORKER HEALTH	ENVIRONMENT	COMMENTS
Extractable Heavy Metals	**UK & EU**	UK REACH Annex XVII Entry 72 REACH Annex XVII Entry 72 (Including Annex XVII Entries 28, 29 and 30)	EN 16711-2:2015 (Cd, total Cr, As, Pb) EN ISO 17075-2:2017 (Cr VI)	≤ 1 mg/kg (LEAD) ≤ 1 mg/kg (CADMIUM) ≤ 1 mg/kg (ARSENIC) ≤ 1 mg/kg (CHROMIUM)	**Test method:** EN 16711-2:2015 (Cd, total Cr, As, Pb) EN ISO 17075-2:2017 (Cr VI) **Requirement:** ≤ 0.2mg/kg (LEAD) ≤ 0.1 mg/kg (CADMIUM) ≤ 1 mg/kg (ARSENIC) ≤ 1 mg/kg (CHROMIUM) ≤ 1 mg/kg (NICKEL) ≤ 0.2 mg/kg (LEAD) **UNDER 6 YEAR OLD PRODUCTS ONLY:** **Test method:** EN 71 - 3:2019+A1:2021 **Requirement:** All Extractible Heavy Metals must meet category I, II, III of EN 71-3:2019+A1:2021 Migration of certain elements - migration limits			✔	✔							Arsenic, Cadmium, Mercury, Lead and Chromium (VI) are banned in textile production. Refer to individual descriptions for Cadmium, Lead and Chromium (VI). Arsenic is found in cotton farming as a preservative, pesticide and defoliant. Mercury is found in pesticides and as a contaminant in Caustic Soda (NaOH). Mercury compounds have been used in paints and surface coatings.				Arsenic, Cadmium, Mercury, Lead and Chromium (VI) . See individual metals for more detail.
		EU Toy Safety Directive (2009/48/EC) Accessible materials for children under 6 years UK Toy Safety Regulations	EN 71-3:2019+A1:2021 GB 21550 clause 5.4 CNS 4747-2	All Extractible Heavy Metals must meet category I, II, III of EN 71-3:2019+A1:2021 Migration of certain elements - migration limits		✔	✔			✔	✔	✔	✔		✔				
	CHINA	GB21550-2008						✔	✔										
	TAIWAN	CNS15503-2018 (children's product)																	
	UAE	UAE.S Consumer Product Safety	Method of Extraction DIN EN ISO 105- E04-2013 Method of Detection ICP-MS or ICP- OES	Cadmium: ≤ 0.1mg/kg Copper: ≤ 25 mg/kg Nickel: ≤ 1 mg/kg Lead: ≤ 0.2 mg/kg	All Extractible Heavy Metals must meet category I, II, III of EN 71-3:2019+A1:2021 Migration of certain elements - migration limits														
Flame Retardants (Brominated)	**UK & EU**	UK REACH Annex XVII Entries 67, 45, 8 REACH Annex XVII Entries 45, 8	EN ISO 17881-1:2016	DecaBDE - <1000 mg/kg OctaBDE - <1000 mg/kg PBB, TRIS, TEPA - Not Detected;	**Test method:** EN ISO 17881-1:2016 **Requirement:** **USAGE BAN:** PBB, TRIS, TEPA, TCEP, TDCPP, PentaBDE, OctaBDE, DecaBDE TetraBDE, HexaDBE, HeptaDBE: 10 mg/kg Antimony trioxide, SCCP, TBB, TBBPA, TBPH, TCPP: 1000 mg/kg HBCDD - 100mg/kg	✔	✔	✔	✔	✔	✔	✔	✔			Flame retardants are used in a wide range of products like automobiles, electronics and textiles because of their stability and heat resistance.	C M	C M		These kinds of flame retardants are suspected to be carcinogenic and mutagenic.
		Persistent Organic Pollutants (POPs) (EU) 2019/1021		<500mg/kg sum of TetraBDE, PentaBDE, HexaBDE, HeptaBDE, DecaBDE															
		RoHS 2 Directive - 2011/65/EU (For products containing electrical components)		< 1000mg/kg PBB < 1000mg/kg PBDE															
	CANADA	Canada Consumer Product Safety Act (CCPSA) Schedule 2, Item 16		Products that intended for a child under 3 years of age and that are made in whole or in part of polyurethane foam shall not contain Tris (2-chloroethyl) Phosphate (TCEP).															
	USA	State Legislations: Washington, Maine, Oregon, New York, Vermont		PentaBDE, OctaBDE, DecaBDE, TCEP, TDCPP : Usage ban Antimony trioxide, HBCDD, SCCP, TBB, TBBPA, TBPH, TCPP :<1000 mg/kg															
Formaldehyde	**UK & EU**	REACH Annex XVII Entry 77 (Applies from 6th August 2026)	EN 16516:2017+A1:2020	< 0.062 mg/m3 for furniture and wood-based articles < 0.080 mg/m3 for articles other than furniture and wood-based articles	**Test method:** EN ISO 17226-1:2021 (leather) EN ISO 14184-1:2011 (textiles) - Free & Hydrolysed formaldehyde EN ISO 14184-2:2011 (textiles) Released formaldehyde **Requirement:** Little White Company <20mg/kg Other products <20mg/kg **From 2026:** **Test method:** EN 16516:2017+A1:2020 **Requirement:** <0.062 mg/m3 for furniture and wood-based articles <0.080 mg/m3 for articles other than furniture and wood-based articles	✔			✔	✔	✔	✔	✔			Formaldehyde is a volatile organic compound whose chemical properties make it suitable to be used as an anti-creasing and anti-shrinking agent. It can be co-polymerized with phenol or urea to form polymeric resins. In textiles and apparel, formaldehyde may be found in stiffened and permanent press fabrics.	I	T S		Despite its multi-function properties, formaldehyde is an irritant that sensitizes mucous membranes. When inhaled formaldehyde may cause headaches, a burning sensation in the throat, and difficulty breathing, and can trigger or aggravate asthma symptoms
		UK REACH Annex XVII Entry 72 REACH Annex XVII Entry 72	EN ISO 17226-1:2021 (leather) EN ISO 14184-1:2011 (textiles) - Free & Hydrolysed formaldehyde EN ISO 14184-2:2011 (textiles) Released formaldehyde	<75mg/kg															
		Toy Safety Directive (2009/48/EC) as amended by (EU) 2019/1929 UK Toy Safety Regulations		< 30mg/kg in textile, leather and paper toy materials		✔													
	UAE	UAE.S Consumer Product Safety		<20 mg/kg															
	AU	Australian Competition and Consumer Commission Safety Guidance		<30 mg/kg in clothing specifically marketed as suitable for people with sensitive skin <100 mg/kg in garments which contact the skin <300 mg/kg in other garments or fabrics															
	JAPAN	Japan Law 112		< 20mg/kg in children's wear under 36 months < 75mg/kg in children's wear over 36 months															
	CHINA	Textile: GB 18401-2010 Leather: GB 20400-2006 Footwear: GB 25038-2010		For Textile & Leather: <75mg/kg for products in direct contact with skin Non-Direct skin-contact = 300 mg/kg For footwear: 75 mg/kg		✔													
Lead	**UK & EU**	UK REACH Annex XVII Entry 63 REACH Annex XVII Entry 63	**Metal:** CPSC-CH-E1001-08.2 **Non-metal:** CPSC-CH-E1002-08.2 **Surface coating:** CPSC-CH-E1003-09.1	<0.1% by weight of the PVC article (Applies from 29th November 2024) <0.05% (500mg/kg) in metal parts of Jewellery <0.05% in accessible parts that may be placed in the mouth by children.	**Test method:** Metal: CPSC-CH-E1001-08.2 Non-metal: CPSC-CH-E1002-08.2 Surface coating: CPSC-CH-E1003-09.1 **Requirement:** <90 mg/kg Metal Parts of Jewellery: <500 mg/kg Little White Company Products: <40mg/kg	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	Lead is a metal which can be found naturally in many ores. Catalysts used to synthesize paint, plastic, pigment inks and coatings may contain lead. As a result, traces of lead compounds may remain in the finished product.	C		C O	Lead is a suspected carcinogen and can adversely affect the central nervous system, kidneys and the immune system.
	USA	CALIFORNIA: CPSIA 2008 (Applies to children's products)		< 100mg/kg in substrates < 90mg/kg in surface coatings															
		WASHINGTON: 'Children's safe products' - Washington State Law		< 90mg/kg															
		ILLINOIS: Public Act 097-0612 - Lead Poisoning Act		<40mg/kg in children's products															
	CANADA	Canada Consumer Product Safety Act (CCPSA), Consumer Products Containing Lead Regulations (SOR/2018-83) & Surface Coating Materials Regulations (SOR/2016-193)		Paint/ Similar-surface coating: 90 mg/kg Accessible substrate: 100 mg/kg															
Nickel	**UK & EU**	UK REACH Annex XVII Entry 27 REACH Annex XVII Entry 27	EN 12472:2020 (Accelerated Wear & Corrosion) EN 1811:2023 (Nickel Release)	< 0.5µg/cm2/week for products in prolonged contact with the skin < 0.2µg/cm2/week for ear/body piercing posts	**Test method:** EN 12472:2020 (Accelerated Wear & Corrosion) EN 1811:2023 (Nickel Release) **Requirement:** Direct and prolong contact with skin: <0.05 µg/cm²/week						✔					Nickel is a naturally occurring metal. In textiles and apparel, nickel can be found in paints, inks, plastic and metal accessories. Applicable to metal items in direct contact with the skin.	S			In metal components, nickel can migrate to the surface of the metal causing skin irritation or high levels of skin allergy in some consumers, particularly in prolonged skin contact.

SUBSTANCE	REGULATIONS				THE WHITE COMPANY REQUIREMENTS	APPLICABLE MATERIALS										POTENTIAL USES SUMMARY	EXPOSURE & HAZARD			
	COUNTRY	LEGISLATION / REGULATION	TEST METHODS	LEGISLATION REQUIREMENTS		LEATHER	NATURAL TEXTILE	SYNTHETIC TEXTILE	PLASTIC (inc PU/PVC)	RUBBER	METAL	PAPER / CARD	WOOD	GLASS / CERAMICS	MIXTURES		CONSUMER HEALTH	WORKER HEALTH	ENVIRONMENT	COMMENTS
Nitrosamines	**UK & EU**	EU Directive 93/11/EEC (Teething Rings) also Eco-label requirement EU Toy Safety Directive (2009/48/EC) UK Toy Safety Regulations	EN ISO 19577:2019 EN 12868:2017 EN 71-12:2016	<0.1mg/kg	**Test method:** EN ISO 19577:2019 EN 12868:2017 EN 71-12:2016 **Requirement:** Not detected (detection limit: 0.5 mg/kg)				✓	✓						Nitrosamines, and are associated with rubber and latex products, chemical intermediaries and finished cosmetics.	C	C		They are known to be carcinogenic.
NMP (1-methyl-2-pyrrolidone)	**UK & EU**	REACH Annex XVII Entries 71 & 72 UK REACH Annex XVII Entries 71 & 72	EN ISO 19070:2016	<3000 mg/kg <.3% in mixtures	**Test method:** EN ISO 19070:2016 **Requirements:** <3000 mg/kg <0.3% in mixtures	✓	✓	✓	✓							Due to its good solvency properties NMP is used to dissolve a wide range of polymers. It is also used as a solvent for surface treatment of textiles, resins, and metal coated plastics or as a paint stripper.		R		Suspected of being reprotoxic. It could cause adverse effects on sexual function and fertility in adult males and females, as well as developmental toxicity in the offspring.
Nonyl phenol (NP) and nonyl phenol ethoxylates (NPE)	**UK & EU**	REACH Annex XVII Entries 46 & 46a (as amended by Regulation (EU) No 2016/26) UK REACH Annex XVII Entries 46 & 46a	EN ISO 18218-1:2015 (leather) EN ISO 18218-2:2019 (leather) EN ISO 18254-1:2016 (textiles)	< 1000mg/kg in mixtures <100mg/kg guidance limit for final product < 100mg/kg for NPE only	**Test method:** EN ISO 18218-1:2015 (leather) EN ISO 18218-2:2019 (leather) EN ISO 18254-1:2016 (textiles) **Requirement:** < 1000mg/kg in mixtures <100mg/kg guidance limit for final product < 100mg/kg for NPE only	✓	✓	✓							✓	Used as wetting agents to improve the coverage and penetration of substances, and enhance dyeing and as a binder in non-woven fabrics.	T ED		VP T ED	NP is a potent endocrine disrupter to the aquatic environment and can cause feminization in some male fish.
Octyl phenol (OP) and octyl phenol ethoxylates (OPE)	**UK & EU**	REACH candidate list for OPE.	EN ISO 18218-1:2015 (leather) EN ISO 18218-2:2019 (leather) EN ISO 18254-1:2016 (textiles)	< 1000mg/kg in mixtures < 100mg/kg for final product	**Test method:** EN ISO 18218-1:2015 (leather) EN ISO 18218-2:2019 (leather) EN ISO 18254-1:2016 (textiles) **Requirement:** < 1000mg/kg in mixtures <100mg/kg guidance limit for final product < 100mg/kg for NPE only	✓	✓	✓								Used as wetting agents to improve the coverage and penetration of substances, and enhance dyeing and as a binder in non-woven fabrics.			VP	
Organostannic Compounds (Organotins)	**UK & EU**	REACH Annex XVII Entry 20	SATRA TM277:2022 PD CEN ISO/TS 16179:2012 EN ISO 22744-1:2020 (Textiles) EN ISO 22744-2:2020 (Textiles)	Tri-substituted organostannic compounds such as TBT/TPhT/TCyT/TOT/TPT/DBT/DOT ≤ 0.1% by weight of tin	**Test method:** SATRA TM277:2022 PD CEN ISO/TS 16179:2012 EN ISO 22744-1:2020 (Textiles) EN ISO 22744-2:2020 (Textiles) **Requirement:** Tri-substituted organostannic compounds such as TBT/TPhT/TCyT/TOT/TPT/DBT ≤ 0.1% by weight of tin DOT None Detected LITTLE WHITE ONLY: < 0.9mg/kg (total) for Category I <0.2mg/kg (total) for Category II < 12mg/kg (total) for Category III	✓	✓	✓	✓	✓		✓				The major commercial applications of organotin compounds are as plastic heat stabilisers, catalytic agents, industrial biocides and antifouling for paints. In textiles organotins are associated with plastics/rubber, inks, paint, metallic glitter, PU and heat transfer material.	ED	S ED	T	Organotin compounds are environmental pollutants and particularly harmful and toxic to the aquatic organisms. They can damage liver, kidneys, and cause disruption of the endocrine system.
	JAPAN	Japan Law 112		< 1mg/kg (TBT only in textiles) < 0.5mg/kg (TBT in children's products under 36 months) < 1mg.kg other organotins																
	UK & EU	EU Toy Safety Directive (2009/49/EC) (For Childrens toys - requirement for all materials) UK Toy Safety Regulations	EN 71-3:2019+A1:2021	< 0.9mg/kg (total) for Category I <0.2mg/kg (total) for Category II < 12mg/kg (total) for Category III (MeT, DMT, BuT, DProT, DBT, TBT, MOT, TeBT, DPhT, DOT, TPhT)															
Pentachlorophenol (PCP), its salts and esters	**UK & EU**	UK REACH Annex XVII Entry 22	EN ISO 17070:2015 PD CEN/TR 14823:2003 (Wood) EN 717-3:1996 (Wood)	< 1000mg/kg in substances or mixtures	**Test method:** EN ISO 17070:2015 PD CEN/TR 14823:2003 (Wood) EN 717-3:1996 (Wood) **Requirement:** <5mg/kg < 1000mg/kg in substances or mixtures											Pentachlorophenol is an organochlorine compound used as a pesticide and a disinfectant.	ED	ED C	VP T	Acute contact exposure through contact or inhalation with penta-treated products can result in severe irritation. Chronic risks include damage to organ systems like the liver and kidney, as well as impacts on immune, nervous, and endocrine system functioning.
		Persistent Organic Pollutants Regulation (EU) 2019/1021 as amended by (EU) 2021/277		< 5mg/kg		✓	✓			✓		✓	✓		✓					
	GERMANY	German Gerfahrstoff Verordnung (Hazardous Substances Ordinance) Annex IV, No 12																		
Perfluoroalkyl and polyfluoroalkyl substances (PFAs)	**USA**	California Assembly Bill No 1817	In-house laboratory Methods	< 100mg/kg total organic fluorine (from 1st January 2025) < 50mg/kg total organic fluorine (from 1st January 2027)	**Test method:** In-house Laboratory Methods **Requirement:** < 100mg/kg total organic fluorine (from 1st January 2025) < 50mg/kg total organic fluorine (from 1st January 2027)	✓	✓	✓	✓	✓				✓		Per- and polyfluoroalkyl substances (PFAS) are a large, complex group of synthetic chemicals that have a wide range of uses. For example, PFAS are used to keep food from sticking to packaging or cookware, make clothes and carpets resistant to stains, and create firefighting foam that is more effective.	VP B		VP	PFAs are very persistent and bio accumulative.
Perfluorocarboxylic acids (PFCAs), their salts and precursors	**UK & EU**	REACH Annex XVII Entry 68	PD CEN/TS 15968:2010	< 25µg/kg sum of PFCAs and their salts < 260µg/kg of sum of PFCA related substances	**Test method:** PD CEN/TS 15968:2010 **Requirement:** < 25µg/kg sum of PFCAs and their salts < 260µg/kg of sum of PFCA related substances	✓	✓	✓							✓	May have been used in electronic articles; medical and laboratory devices; photo-imaging; inks; building and construction materials; food packaging; paints and varnishes; personal care products; cleaning and washing agents; ski waxes; and in the automotive industry.	VP B R	VP	VP B R	PFCAs are very persistent and bio accumulative.
Perfluorooctanoic acid (PFOA) its salts and PFOA related compounds	**UK & EU**	Persistent Organic Pollutants Regulation (EU) 2019/1021 as amended by (EU) 2020/784 UK REACH Annex XVII Entry 68	PD CEN/TS 15968:2010 EN ISO 23702-1:2018	<25ug/kg PFOA and its salts in substances, mixtures or articles. <1mg/kg PFOA related compounds	**Test method:** PD CEN/TS 15968:2010 EN ISO 23702-1:2018 **Requirement:** <25ug/kg PFOA and its salts in substances, mixtures or articles. <1mg/kg PFOA related compounds	✓	✓	✓	✓							PFOA has been used to provide soil, oil and water resistance to textiles, apparels, leather and footwear. In textile processing, PFOA is also used in polymers like polytetrafluoroethylene (PTFE).			VP	PFOA is classified as a persistent organic pollutant.
	NORWAY	Norwegian Product Regulations		Textile/carpet/coated consumer product: 1 µg/m² other consumer product: 1000 mg/kg																

SUBSTANCE	REGULATIONS				THE WHITE COMPANY REQUIREMENTS	APPLICABLE MATERIALS										POTENTIAL USES SUMMARY	EXPOSURE & HAZARD			
	COUNTRY	LEGISLATION / REGULATION	TEST METHODS	LEGISLATION REQUIREMENTS		LEATHER	NATURAL TEXTILE	SYNTHETIC TEXTILE	PLASTIC (inc PU/PVC)	RUBBER	METAL	PAPER / CARD	WOOD	GLASS / CERAMICS	MIXTURES		CONSUMER HEALTH	WORKER HEALTH	ENVIRONMENT	COMMENTS
Perflurooctane sulfonates (PFOS)	**UK & EU**	Persistent Organic Pollutants Regulation (EU) 2019/1021 as amended by (EU) 2020/784	PD CEN/TS 15968:2010 EN ISO 23702-1:2018	Testing relevant when water/stain resistant treatment has been applied < 1µg/m2 for textiles and coated materials < 0.1% by mass for other materials < 10mg/kg in substances or mixtures	**Test method:** PD CEN/TS 15968:2010 EN ISO 23702-1:2018 **Requirement:** Testing relevant when water/stain resistant treatment has been applied < 1µg/m2 for textiles and coated materials < 0.1% by mass for other materials < 10mg/kg in substances or mixtures	✔ WHEN STAIN /WATER RESISTATANT TREATMENT HAS BEEN APPLIED	✔ WHEN STAIN /WATER RESISTATANT TREATMENT HAS BEEN APPLIED	✔ WHEN STAIN /WATER RESISTATANT TREATMENT HAS BEEN APPLIED	✔ WHEN STAIN /WATER RESISTATANT TREATMENT HAS BEEN APPLIED							PFOS has been used to provide soil, oil and water resistance to textiles, apparels, leather and footwear. In textile processing, PFOS is also used as wetting agents to improve the coverage and penetration of substances, and enhance dyeing and as a binder in non-woven fabrics.			VP	PFOS is classified as a persistent organic pollutant.
	CANADA	Prohibition of Certain Toxic Substances Regulations, 2012 (SOR/2012-285) and Its Amendment (SOR/2016-252)		Prohibited																
Pesticides	**UK & EU**	Persistent Organic Pollutants Regulation 2019/1021	ISO 22517:2021	NONE DETECTED: Aldrin (309-00-2), Chlordane (57-74-9), Dichloro-diphenyl-trichloroethane (DDT) (50-29-3), Dieldrin (60-57-1), Endrin (72-20-8), Heptachlor (76-44-8), Hexachlorocyclohexane (including lindane) (58-89-9, 319-84-6, 319-85-7and 608-73-1), Chlordecone (143-50-0), pentachlotobenzene (608-93-5), Endosulfan (115-29-7, 959-98-8, 33213-65-9) ≤ 5mg/kg : Pentachlorophenol (87-86-5)	**Test method:** ISO 22517:2019 **Requirement:** See Legislation requirements.	✔	✔									Pesticide residues can be found in animal products and natural textiles.			VP	Persistent organic pollutants (POPs) are organic substances that persist in the environment, accumulate in living organisms and pose a risk to our health and the environment.
pH Value	**UK & EU**	Requirement for PPE Regulation (EU) 2016/425	EN ISO 4045:2018 - Leather EN ISO 3071:2020- Textiles/Other Materials	3.5 < pH < 9.5 (textiles and leather for products other than safety footwear) > 3.2 (leather from safety footwear only)	**Test method:** EN ISO 4045:2018 - Leather EN ISO 3071:2006 - Textiles/Other Materials **Requirement:** Textiles: 4 < pH < 9 Leathers: >3.2	✔	✔	✔	✔							Only applicable to PPE legislation in the UK & EU. Therefore applicable to Oven Gloves.	S			This is only part of PPE legislation in the EU however pH imbalance can cause sensitisation.
	KOREA	Korean REACH		Textiles: 4 < pH < 9																
Phenylmercury compounds: Phenylmercury 2- ethylhexonate, Phenylmercury Acetate, Phenylmercury neodecanoate, Phenylmercury octanoate, Phenylmercury propionate	**UK & EU**	REACH Annex XVII Entry 62 UK REACH Annex XVII Entry 62	EN 16711-1:2015	< 0.01% by weight of Mercury	**Test Method:** EN 16711-1:2015 **Requirement:** < 0.01% by weight of Mercury				✔							Phenylmercury compounds are organomercury compounds which are often used as a preservative, disinfectant, and antitranspirant	C		C O	Mercury and its compounds are highly toxic to humans, ecosystems and wildlife, with mercury toxicity most commonly affecting the neurologic, gastrointestinal and renal organ systems.
Phthalates	**UK & EU**	REACH Annex XVII Entries 51,52 & 72 UK REACH Annex XVII Entries 51, 52 & 72	EN ISO 16181-1:2021 EN ISO 16181-2:2021 EN ISO 14389:2022 CPSC-CH-C1001-09.4 (2018) UAE.S GSO ISO 14389-2014	< 0.1% sum of DEHP, DBP, BBP and DIBP < 0.1% sum of DIDP, DINP, DNOP (products intended to be mouthed) <0.1% sum of DIHP, Bis(2-methoxyethyl)phthalate, DIPP, DnPP, DnHP	**Test method:** CPSC-CH-C1001-09.4 (2018) EN ISO 14389:2022 **Requirement:** < 0.1% (individually or in combination with other phthalates in this entry or in other entries of Annex XVII (DEHP, DIDP, DINP, DnOP, DBP, BBP, DIBP)					✔	✔					Predominantly found as plasticisers in flexible plastic products such as children toys, and coated textiles e.g. PVC, PU. They are also used as fixatives, detergents, lubricating oils and solvents.	ED C	ED C	ED C	Phthalates are endocrine disruptors, impairing fertility, impacting aquatic life and are possible carcinogens.
		RoHS 2 Directive - 2011/65/EU (For products containing electrical components)		< 0.1% of DBP, DEHP, BBP and DIBP																
	USA	WASHINGTON: 'Children's safe products' - Washington State Law		< 0.1% sum of DEHP, DBP, BBP, DIDP, DINP and DNOP																
		CALIFORNIA: CPSIA section 108 (as updated by 82 FR 49938)		< 0.1% of DEHP, DBP, BBP																
	CANADA	Canada Consumer Product Safety Act (CCPSA), Phthalates Regulation (SOR/2016-188)		For child care article (for aged < 4 years) or toys that cannot be placed in the mouth of child under 4 years old: each of DEHP, DBP, BBP: ≤ 0.1 % (1000 mg/kg) For child care article (for aged < 4 years) or toys that can be placed in the mouth of child under 4 years old: each of DEHP, DIDP, DINP, DnOP, DBP, BBP: ≤ 0.1 % (1000 mg/kg)																
	UAE	UAE.S Consumer Product Safety		Shall not exceed 1000 mg/kg in sum																
Phthalic Acid	**UK & EU**	REACH Annex XVII Entries 1a & 1b UK REACH Annex XVII Entries 1a & 1b	EN ISO 14389:2014 Textiles -Determination of the phthalate content - Tetrahydrofuran method	1,2-benzenedicarboxylic acid; di-C 6-8-branched alkylesters, C 7-rich: 1 000 mg/kg (individually or in combination with other phthalates in this entry or in other entries of Annex XVII that are classified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 in any of the hazard classes carcinogenicity, germ cell mutagenicity or reproductive toxicity, category 1A or 1B	**Test method:** EN ISO 14389:2014 **Requirement:** < 0.1% (individually or in combination with other phthalates in this entry or in other entries of Annex XVII					✔	✔				✔	Phthalic acid is used mainly in the form of the anhydride to produce other chemicals such as dyes, perfumes, saccharin, phthalates and many other useful products. Phthalic acid, when found in tissues or biofluids arises from exposure to these phthalate products.	ED C	ED C	ED C	Phthalates are endocrine disruptors, impairing fertility, impacting aquatic life and are possible carcinogens.
Polychlorinated Phenols Including Pentachlorophenol (PCP) its salts and esters. (Including TeCP, TCP, OPP)	**UK & EU**	REACH Annex XVII Entries 22 UK REACH Annex XVII Entries 22	BS EN ISO 17070:2015 PD CEN/TR 14823:2003 (Wood) EN 717-3:1996 (Wood)	PCP: 1000mg/kg TeCP: <5mg/kg guidance limit TCP: <5mg/kg guidance limit	**Test method:** BS EN ISO 17070:2015 **Requirement:** PCP, 2,3,5,6 -TeCP: Not Detected TCP: <5mg/kg OPP: ≤ 500 mg/kg guidance limit	✔	✔	✔	✔	✔			✔		✔	Chlorophenols are polychlorinated compounds used as preservatives and pesticides. PCP, OPP and TeCP have been used as mould prevention for leather / hides, and as preservatives in print pastes, but are now regulated and should not be used.	T R C	T R C	CO	Some Chlorophenols are toxic when inhaled, ingested or absorbed through the skin. Long term reproductive effects, liver and kidney damage, and suspected carcinogens.
		Persistent Organic Pollutants Regulation 2019/1021	BS EN ISO 17070:2015	PCP: <1mg/kg (None Detected)																
	GERMANY	German Gerfahrstoff Verordnung (Hazardous Substances Ordinance) Annex IV, No 12	**Textile / Leather:** LFGB § 64 BVL B82.02.8, GC-ECD analysis; **Polyester / polyester-blend / printed fabric:** Modified § 64 LFGB BVL B82.02.8 with alkaline digestion	PCP: 5 mg/kg																
	CHINA	GB 25038-2010	GB/T 18414.1 orGB/T 18414.2	PCP, 2,3,5,6-TeCP: not detected																
Polycyclic Aromatic Hydrocarbons (PAHs)	**UK & EU**	REACH Annex XVII Entries 50 & 72 UK REACH Annex XVII Entries 50 & 72	EN ISO 16190:2021 EN 17132:2019 (textiles)	< 0.5 mg/kg in toys and <1mg/kg in articles of the below PAH's Benzo[a]pyrene Benzo[e]pyrene Benzo[a]anthracene Chrysene Benzo[b]fluranthene (Benz[e]acephenanthrylene) Benzo[j]fluranthene Benzo[k]flouranthene Dibenzo[a,h]anthracence	**Test method:** with reference to AfPS GS 2014:01 PAK, GC-MS analysis **Requirement:** See legislation requirements column. Total PAH's <10mg/kg in articles					✔	✔					PAHs are produced by the incomplete combustion of organic materials such as wood, oil, and animal fats. PAHs are less water-soluble, evaporable and degradable and attach themselves to organic particulate matter. PAH contaminations have been found in rubber and various plastics, and as contaminants in black carbon pigments.	C M	C M	T	Many of these organic molecules are considered to be carcinogenic, mutagenic and toxic to the aquatic environment.
	GERMANY	German Product Safety Act, ProdSG - Geprüfte Sicherheit (GS Mark)																		

SUBSTANCE	REGULATIONS				THE WHITE COMPANY REQUIREMENTS	APPLICABLE MATERIALS										POTENTIAL USES SUMMARY	EXPOSURE & HAZARD			
	COUNTRY	LEGISLATION / REGULATION	TEST METHODS	LEGISLATION REQUIREMENTS		LEATHER	NATURAL TEXTILE	SYNTHETIC TEXTILE	PLASTIC (inc PU/PVC)	RUBBER	METAL	PAPER / CARD	WOOD	GLASS / CERAMICS	MIXTURES		CONSUMER HEALTH	WORKER HEALTH	ENVIRONMENT	COMMENTS
Quinoline	**UK & EU**	REACH Annex XVII Entry 72 UK REACH Annex XVII Entry 72	DIN 54231:2022	< 50mg/kg	**Test method:** DIN 54231:2022 **Requirement:** ≤ 50 mg/kg		✔	✔								Quinoline is also used as a catalyst, a corrosion inhibitor, in metallurgical processes, in the manufacture of dyes, as a preservative for anatomical specimens, in polymers and agricultural chemicals, and as a solvent for resins and terpenes.	ED T	ED T	T	This can have high acute toxicity effects.
Short Chain Chloroparaffins (SCCP) (C10 - C13 Chloroalkanes)	**UK & EU**	Persistent Organic Pollutants Regulation (EU) 2019/1021	EN ISO 18219-1:2021 EN 12766-1:2000	< 1% in substances or mixtures < 0.15% in articles	**Test method:** EN ISO 18219-1: 2021 **Requirement:** < 1% in substances or mixtures < 0.15% in articles	✔			✔	✔						SCCPs are used as flame retardants or plasticisers in plastics, rubbers, inks, paints, adhesives and coatings. They may also be found as impurities in fat-liquoring agents in leather production.	C	I	VP T	SCCPs are persistent and toxic in the environment, suspected carcinogens and repeated exposure causes skin dryness and cracking.
Total and Soluble heavy metal	**CHINA**	GB 21550-2008	GB 21550 Section 5.4	≤ 90 mg/kg (LEAD) ≤ 75 mg/kg (CADMIUM)	**Test Method:** EN 1122:2001 (modified) EN16711-2:2015 **Requirement:** Chromium (VI), Mercury, Lead, Cadmium (100mg/kg for sum of four heavy metals) ≤ 90 mg/kg (LEAD) ≤ 75 mg/kg (CADMIUM)				✔		✔	✔	✔	✔	✔	Arsenic, Cadmium, Mercury, Lead and Chromium (VI) are banned in textile production. Refer to individual descriptions for Cadmium, Lead and Chromium (VI). Arsenic is found in cotton farming as a preservative, pesticide and defoliant. Mercury is found in pesticides and as a contaminant in Caustic Soda (NaOH). Mercury compounds have been used in paints and surface coatings.				Refer to individual descriptions for Cadmium, Lead and Chromium (VI).
		GB 28480-2012	With reference to GB/T 28021 - Analysis by ICP	≤ 1000ppm (Arsenic) ≤ 1000ppm (Chromium VI) ≤ 1000ppm (Mercury) ≤ 1000ppm (Lead) ≤ 100ppm (Cadmium)																
	UK & EU	Directive 94/62/EC packaging and packaging waste	EN 1122:2001 (modified) EN16711-2:2015	Chromium (VI), Mercury, Lead, Cadmium (100mg/kg for sum of four heavy metals)																
Tris (2,3 dibromopropyl) phosphate	**UK & EU**	REACH Annex XVII Entry 4 UK REACH Annex XVII Entry 4	EN ISO 17881-2:2016	Shall not be used in textile articles intended to come into contact with the skin	**Test method:** EN ISO 17881-2:2016 **Requirement:** None detected		✔	✔	✔	✔						Used as flame retardant (rigid foams, clear cast acrylic sheet, lacquers, styrene-butadiene rubber, latex rubber, cured unsaturated polyesters, and plastics)	T C		T CO	Toxic, carcinogenic and environmental pollutant.
	CANDA	Canada Consumer Product Safety Act (CCPSA) Schedule 2, Item 10		Wearing apparel composed in whole or in part of textile fibres shall not contain tris (2, 3 dibromopropyl) phosphate.																
Tris (aziridinyl) phosphinoxide	**UK & EU**	REACH Annex XVII Entry 7 UK REACH Annex XVII Entry 7	EN ISO 17881-2:2016	Use Prohibited	**Test method:** EN ISO 17881-2:2016 **Requirement:** None detected		✔	✔								Used as a pesticide for mites and ticks, a photographic emulsion hardener, and an agent in permanent-press treatment of cotton, textile dyeing, and polymer stabilizing	T C	S C	T CO	Toxic, carcinogenic and environmental pollutant.
Volatile Organic Compounds (Residual): Anthracene Benzene Naphthalene Toluene Xylene	**UK & EU**	VOC compounds which may be associated with odour or health effects. SATRA recommended guideline limits	GC-MS Headspace	Anthracene < 1mg/kg (OSHA requirements) Benzene < 1mg/kg (from EH40 WEL) Naphthalene < 5mg/kg (OSHA requirements < 10mg/kg) Toluene < 50mg/kg (from EH40 WEL) Xylene < 50mg/kg (from EH40 WEL)	**Test method:** GC-MS Headspace **Requirement:** ≤ 20 g/m² Total Anthracene < 1mg/kg (OSHA requirements) Benzene < 1mg/kg (from EH40 WEL) Naphthalene < 5mg/kg (OSHA requirements < 10mg/kg) Toluene < 50mg/kg (from EH40 WEL) Xylene < 50mg/kg (from EH40 WEL)	✔	✔	✔	✔	✔	✔	✔	✔	✔		Volatile organic compounds are associated with solvent-based processes like PU coatings and adhesives. They should not be used in textile chemical preparations or for industrial/machine cleaning.		T		VOC's can be harmful to workers health.
	CHINA	GB 21550-2008	GB 21550 Section 5.5	≤ 20 g/m²																

APPENDIX A

LEGISLATION LINKS

As stated in the RSL suppliers are responsible for making sure that materials and finished products meet the defined limits for chemical substances. Products must be tested and comply with the RSL guidelines, in addition to any supplementary requirements imposed by law, local authorities, or regulations related to environmental and product safety.
These may include but are not limited to:

UK:

- General Product Safety (Directive 2001/95/EC)
- General Product Safety Regulations 2005 (2005 No. 1803)
    - http://www.legislation.gov.uk/
- UK REACH Regulations 2019 (2019 No. 758)
    - https://www.hse.gov.uk/reach/index.htm
- Toy Safety Regulations 2011 (2011 No. 1881)
    - https://www.legislation.gov.uk/uksi/2011/1881/contents/made
- The Biocidal Products Regulations 2001 (2001 No. 880)
    - https://www.legislation.gov.uk/uksi/2001/880/contents/made
- Classification, Labelling and Packaging of Chemicals Regulation 2015 (2015 No. 21)
    - https://www.legislation.gov.uk/uksi/2015/21/made
- The Cosmetics Products Enforcement Regulations 2013 (2013 No. 1478)
    - https://www.legislation.gov.uk/uksi/2013/1478/made
- The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012 (2012 No. 3032)
    - https://www.legislation.gov.uk/uksi/2012/3032/contents/made
- Personal Protective Equipment (PPE) Regulation (EU) 2016/425

EU:

EU (Applicable to UK when other legislations does not supersede):

- Regulation (EC) No 1907/2006 Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) – Including POPs and SVHC
  - https://echa.europa.eu/legislation
- Food Contact Materials - Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food.
  - https://eur-lex.europa.eu/eli/reg/2004/1935/2021-03-27
- Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys
  - https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32009L0048
- Biocidal Products - BPR, Regulation (EU) 528/2012
  - https://echa.europa.eu/regulations/biocidal-products-regulation/understanding-bpr
- Classification, Labelling and Packaging – CLP Regulation (EC) No 1272/2008
  - https://echa.europa.eu/regulations/clp/understanding-clp
- Cosmetics Products Regulation (EC) No 1223/2009
  - https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009R1223-20221006
- Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS) Directive 2011/65/EU
  - https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02011L0065-20221001

USA:

Information on USA requirements and legislation may be found on the following:

- Consumer Product Safety Commission (CPSC)
  - https://www.cpsc.gov/
- Federal Trade Commission (FTC)
  - https://www.ftc.gov/
- California Prop 65
  - https://oehha.ca.gov/proposition-65
- Environmental Protection Agency (EPA) including the Toxic Substances Control Act (TSCA)
  - https://www.epa.gov/
  - https://www.regulations.gov/

UAE:

Information on UAE requirements and legislation may be found at the United Arab Emirates Ministry of Industry & Advanced Technology website.

https://moiat.gov.ae/en/

This includes the following:

- Cabinet Resolution No. (20) of 2015 UAE Scheme To Control Food contact materials
- Cabinet Resolution No. (34) of 2013 - Conformity Assessment System for Lighting Products
- Gulf Technical Regulations for Electrical Appliances and Equipment Conformity Mark (BD-142004-01) Low Voltage – Gulf Badge for Low Voltage Electrical Devices.
- Cabinet Resolution No. (18) of 2014 UAE System of Control of Cosmetics and Personal Care Products.
- Cabinet Resolution No. (5) of 2014 – UAE Perfumes Control System
- Cabinet Resolution No. (54) of 2019 – UAE System for Control of Textile Products
- Gulf Toys Technical Regulations (GTTR) (BD-131704-01) & GSO Conformity Tracking Symbol (GCTS)

APPENDIX B

SVHC CANDIDATE LIST

As stated in the RSL suppliers are responsible for making sure that materials and finished products meet SVHC Candidate List requirements. Any products that contain SVHC above a level of 0.1% (w/w) must be highlighted to The White Company before manufacture to ensure all necessary labelling and notifications are made before shipment.
The SVHC list is updated regularly and therefore chemicals on this list will not be added to the main RSL until they are banned or restricted under REACH or another global chemical legislation.

Please see below the link to the latest SVHC list:
Candidate List of substances of very high concern for Authorisation - ECHA (europa.eu)