

# AFIRM Factory Chemical Management Plan

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# Factory Management

Put together a RSL Project Team

Assign:

- \* Roles
- \* Responsibilities





# RSL Strategy for Components and Suppliers

- Know your business
- Specifically include RSL compliance in the contract
- List vendors for components and suppliers
- List type of materials, components and source from each vendor listed above

# Problems / Requirements List



# Understand your RSL Requirements

Describe your overall management strategy to minimize RSL risk

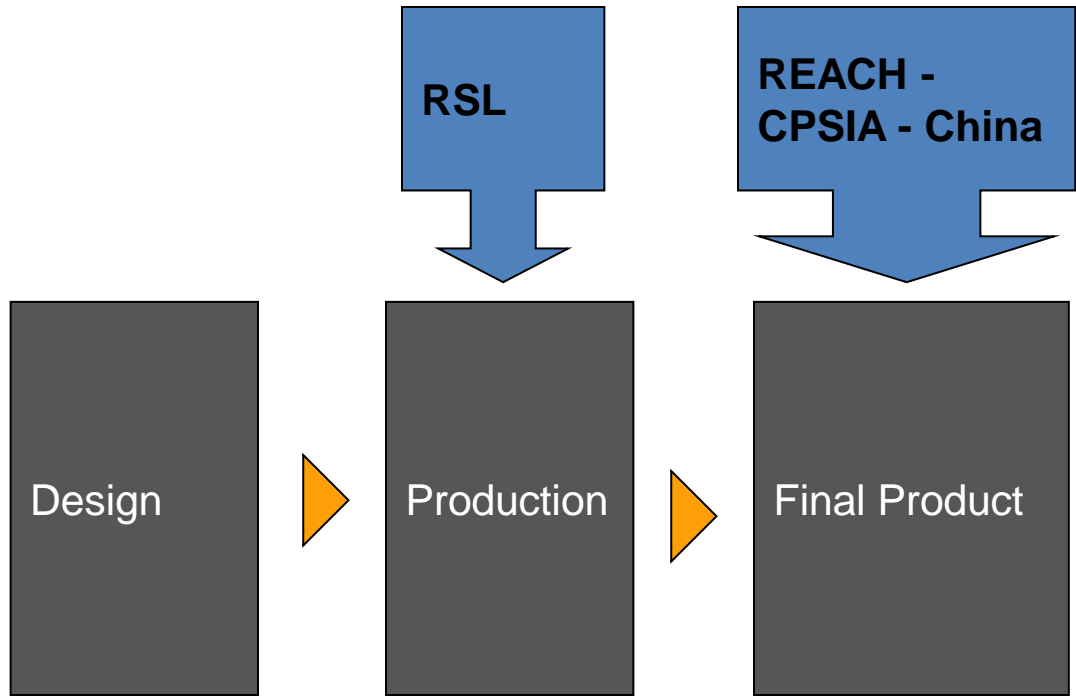
Focus on

- High Risk Materials
- High Risk colors





# Legislation



# Implementation - Sample Testing Approach



- Target high risk materials
- Prioritize Kids Products
- Prioritize Direct Skin Contact
- Randomly check anything
- Sample selection rules based on how a material is used
- Engage factory and vendor

# Road to Success



## Short Term Goals

- Identify RSL risk by material
- Set up the RSL risk control strategy
- Develop tracking report/system.
- All the RSL test results are reported to management on a seasonal basis.

# GOALS



*To get started,  
you must have a destination.*

## Long Term Goals

- Create an evaluation system to track vendor compliance. A score card could be established and implemented
- Use the result of evaluation for the future sourcing decisions
- Share the RSL database with vendors



# Vendor Management

- Describe your management strategy to minimize risk from vendors
  - Classify vendors by RSL risk
  - Define a low risk vendor
  - Define a high-risk vendor
  - Ensure that new vendors understand and meet the RSL



# Chemical Testing

- The best way to manage the RSL is to be knowledgeable about product chemistry

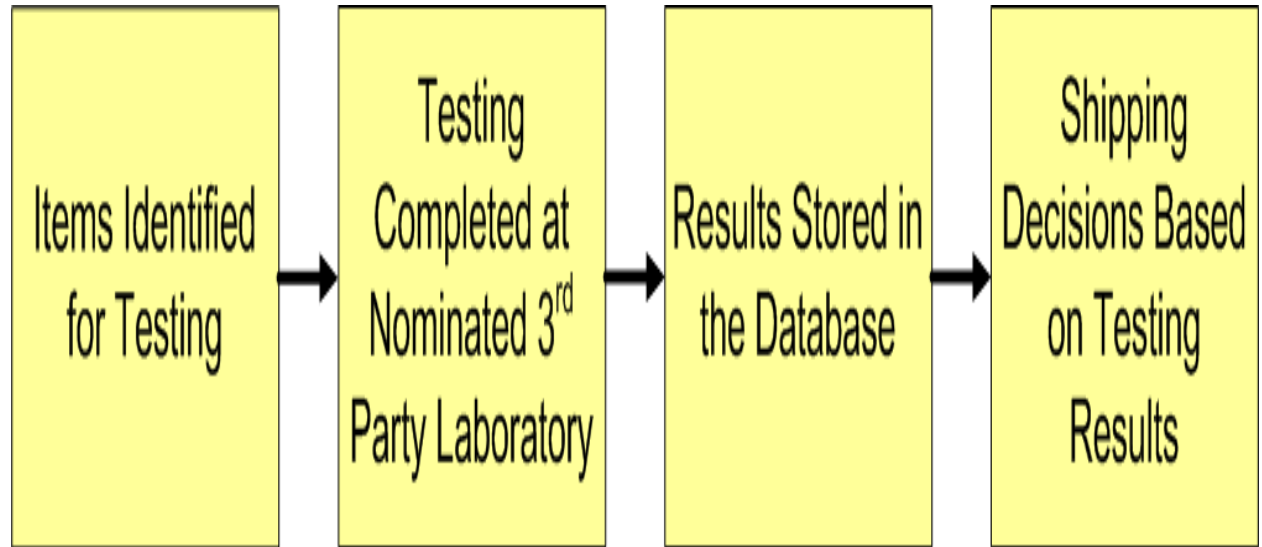
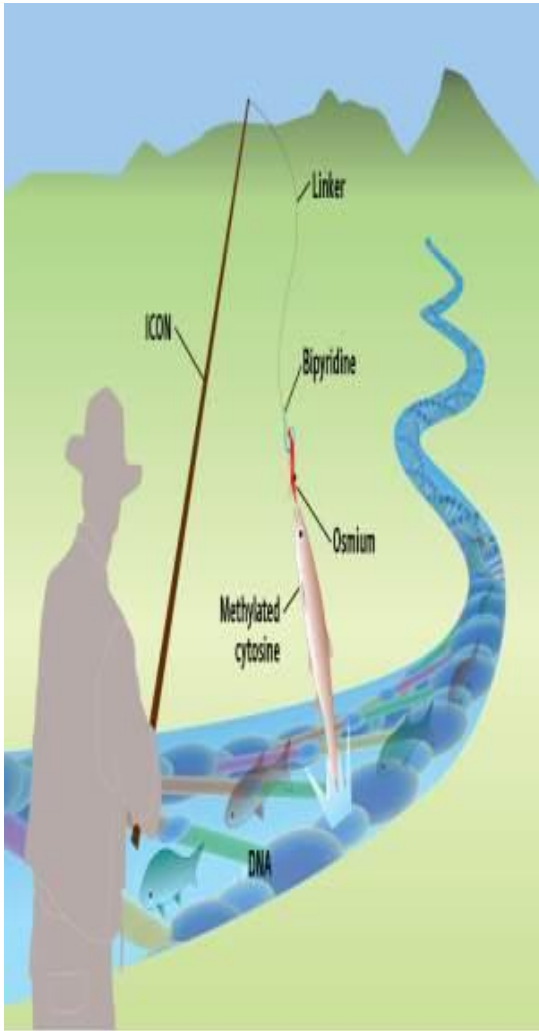


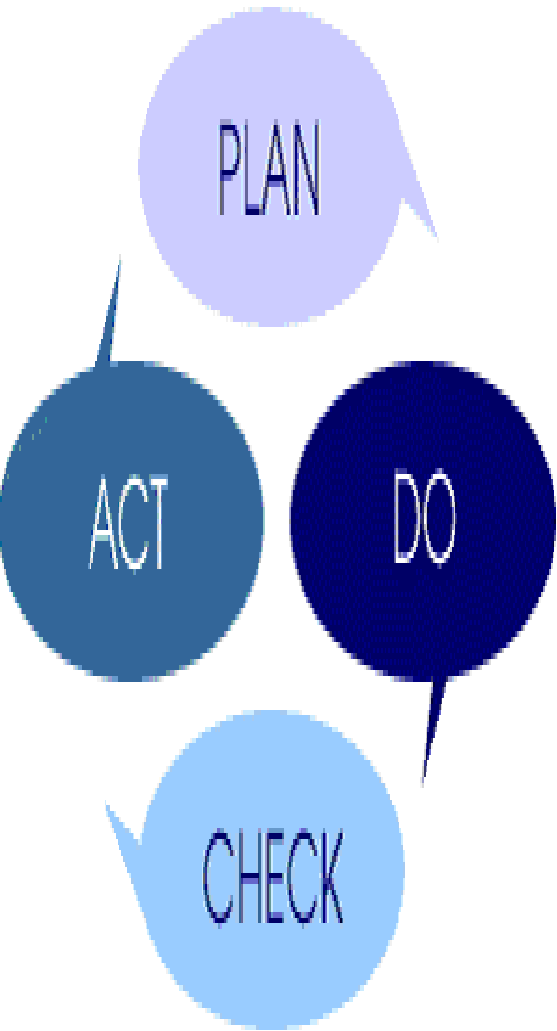


# Build Knowledge

- Understand the process and chemicals involved in the manufacture of the components, for example by checking the MSDS
- Use the RSL risk identification database
- Test components prior to confirmation

# Testing Approach





# Corrective Action

- The cause(s) of individual failures can be varied
- Root cause analysis (PDCA) should determine how to best reduce risk of RSL violation
- A Failure Resolution Form should be used as a tool for tracking

# Non-compliance under production

- Stop production
- Replace with complying materials
- Destroy non-compliant materials
- Vendor to reimburse on all losses



# Data Management



- Access to RSL data throughout the supply chain is a key component in management strategy for the RSL

## Checking list:

- Have a database for all testing data
- Send RSL data for management review on a regular basis
- Identify suppliers with repeated failures and stop the PO

# Tracking Time Table

Progress	Target date	Finish date
Complete RSL Plan and present to factory management	01/20/2013	
Discuss and train RSL Plan with vendors	02/20/2013	
Set up the RSL Action Plan Schedule	04/20/2013	
Prepare material for RSL testing	05/20/2013	
Finish RSL testing	06/20/2013	
Review RSL data trend with vendors	07/20/2013	
Review and revise RSL plan for continuous improvement	08/20/2013	



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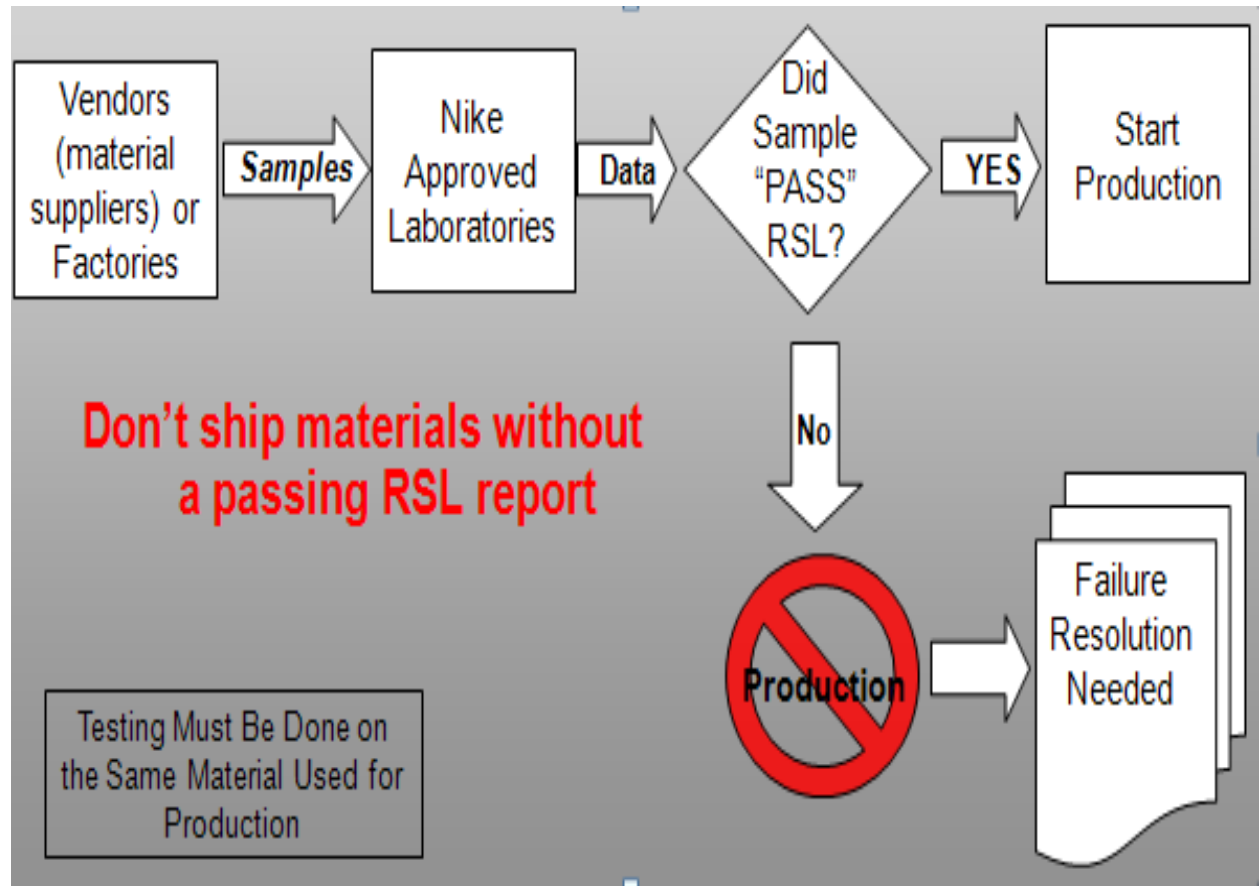
Phylmar Group Environmental Health & Safety Social Responsibility







# Implementation





# Use Safer Phthalate Alternatives

## Safer Phthalate Alternatives

The following substances have been identified as examples of safer alternatives by the U.S. Environmental Protection Agency and/or by the Danish Environmental Protection Agency. They may be suitable for your production needs.

<b>77-90-7</b>	Acetyl tributyl citrate (ATBC)
<b>6422-86-2</b>	Bis(2-ethylhexyl) terephthalate (DEHT/DOTP)
<b>103-23-1</b>	Di(ethylhexyl) adipate (DEHA)
<b>166412-78-8, 47919-59-0</b>	Diisononyl cyclohexane-1,2-dicarboxylate (DINCH)
<b>122-62-3</b>	Dioctyl sebacate (DIDS)
<b>3319-31-1</b>	Trioctyl trimellitate (TOTM)
<b>6846-50-0</b>	Trimethyl pentanyl diisobutyrate (TXIB)

Additional information about these alternatives is available at the following links:

[http://www.epa.gov/opptintr/existingchemicals/pubs/actionplans/phthalates\\_actionplan\\_revised\\_2012-03-14.pdf](http://www.epa.gov/opptintr/existingchemicals/pubs/actionplans/phthalates_actionplan_revised_2012-03-14.pdf)

<http://www2.mst.dk/udgiv/publications/2010/978-87-92708-00-7/pdf/978-87-92708-01-4.pdf>

[http://www.greenchemistryandcommerce.org/documents/PilotProjectFullReportOct2-final\\_000.pdf](http://www.greenchemistryandcommerce.org/documents/PilotProjectFullReportOct2-final_000.pdf)



# 更安全的邻苯二甲酸酯替代品

下列物质已被美国环境保护局和/或丹麦环境保护局确认为安全的替代品。他们可能会满足您的生产需求。

77-90-7	乙酰柠檬酸三丁酯(ATBC)
6422-86-2	对苯二甲酸二(2-乙基己)酯(DEHT/DOTP)
103-23-1	<a href="#">己二酸二(2-乙基己)酯</a> (DEHA)
166412-78-8, 47919-59-0	环己烷1, 2-二甲酸二异壬基酯(DINCH)
122-62-3	癸二酸二辛酯(DIDS)
3319-31-1	偏苯三酸三辛酯(TOTM)
6846-50-0	2,2,4-三甲基-1,3-戊二醇双异丁酸酯 (TXIB)

关于这些替代品的更多的信息可以通过以下链接获得：

[http://www.epa.gov/opptintr/existingchemicals/pubs/actionplans/phthalates\\_actionplan\\_revised\\_2012-03-14.pdf](http://www.epa.gov/opptintr/existingchemicals/pubs/actionplans/phthalates_actionplan_revised_2012-03-14.pdf)

<http://www2.mst.dk/udgiv/publications/2010/978-87-92708-00-7/pdf/978-87-92708-01-4.pdf>



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# Thank You



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