

6. RSL Implementation

A well-governed RSL management program enables suppliers to meet various brand requirements and manage chemical risks. AFIRM recommends the following steps to implement an effective RSL program.

1 Ensure internal governance and communication.

- Develop and publish a company policy, including steps for implementation. (See Appendix A.)
- Ensure commitment from internal stakeholders and the senior management team.
- Assign responsibility to a department or a staff member, and ensure strong governance.
- Perform a risk assessment of your operations to identify areas of exposure to risk.
- Set an implementation schedule and train internal staff. (See Appendix A.)

Best practice: Track emerging legislation and industry standards, and align internal policies and standards with the most stringent regulations and best practices.

2 Communicate your requirements to production facilities and material suppliers.

- Send brand RSLs and testing requirements to upstream suppliers and collect confirmation that they have read, understood, and can meet these requirements.

- Advise vendors of material-specific risks and basic chemical legislation. (See the AFIRM RSL and Chemical Information Sheets.)
- Establish a strong due-diligence procedure to track, gather, and follow up with all vendors on a regular basis.
- Stop conducting business with suppliers that do not comply with your standards.

3 Set up a testing system for monitoring compliance with RSL requirements.

- Follow customer chemical test program at specified laboratories closely, or communicate testing needs to laboratories based on needs of customers or risk. (See the Risk Matrix in the AFIRM RSL.)
- Set up a system for how often finished products or materials are tested for restricted substances. Self-testing of materials will enable stronger performance in customers testing programs.

Best practice: Set up strong internal management systems controlling incoming materials are meeting the RSL, and incoming chemicals are meeting MRSL standards, including self-testing of incoming materials and chemicals as additional due-diligence.

4 Adopt best practices and work on continuous improvement.

- Track emerging legislation and industry standards, and perform ongoing risk assessments of your supply chain and operations.
- Identify the most relevant requirements from customers or industry standards, and adopt them as your own.
- Develop strong internal capacity, governance, and processes for controlling chemical risks in your supply chain and production, incorporating a chemical policy, due-diligence testing, and strong management of incoming materials and chemicals to ensure compliance to the RSL.
- Adopt industry-aligned MRSL standards in manufacturing to support compliance of products to the RSL.