

## Appendix B. Model RSL Testing Program for Brands

This appendix provides an example of what a brand’s testing program might look like. It is included to help suppliers understand the kind of testing requirements they can expect from customers and how to design their own internal testing protocols to meet them. Please note that no two brands have the same protocols and you should always check with your customer to make sure you fully understand their requirements.

**1 Aim**  
To ensure chemical compliance and the safety of finished goods.

**2 Objective**  
All finished goods must be reviewed according to an agreed-upon testing program to ensure that they are safe and legal.

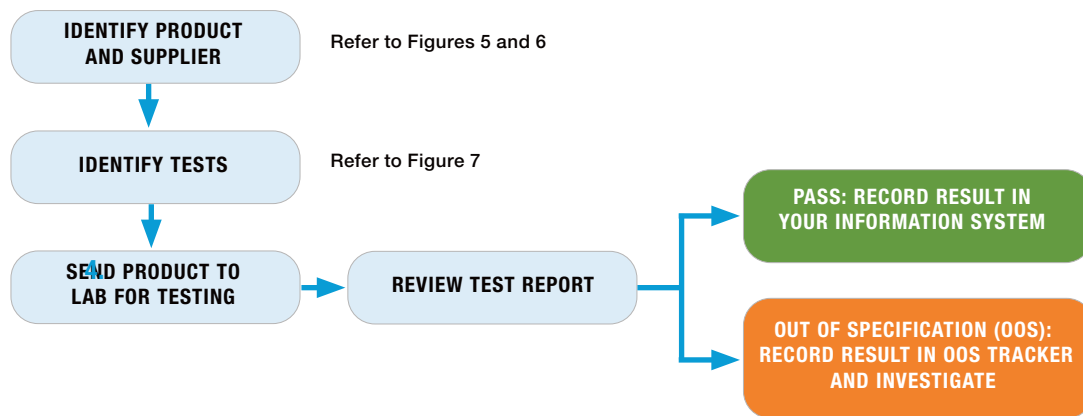
**3 Scope**  
This testing program applies to all brand finished goods, including clothing, accessories, jewelry, footwear, sport equipment, packaging, etc.  
  
The protocol also covers products not branded but for which the brands have legal responsibility.

**4 Introduction**  
As part of their responsibilities, it is important that brands perform a degree of analytical testing to monitor and prove product and supplier performance. Auditing suppliers and setting specifications alone is insufficient to ensure products are legal and safe.

Analytical testing is not designed as a tool to manage quality, although the information gathered from this testing may be used to monitor this indirectly.

- This product data will be used to ensure its chemical compliance and safety
- This product data could be used as part of their defense to prove compliance when challenged by trading standards / courts / media / consumer groups / NGOs.
- Test results will be used internally to demonstrate that management processes are in place and operating correctly.

Figure 4. Procedure for Product Surveillance



**5 Procedure**  
Figure 4 outlines an example of a general, high-level procedure for product surveillance. Details on the first two steps are found in following sections.

## 6 Risk Assessment

Understanding the chemical risks in your supply chain, processes, and product is critical in making good and appropriate decisions. (See Understanding Chemical Risks on page 7).

It is important to know the composition of your products in order to adapt your testing protocol. For example:

- Leather components could contain Chromium VI, Short-chain Chlorinated Paraffins, Azo Dyes, or Formaldehyde
- Some leathers have a PVC coating; they could also contain Lead, Cadmium and Phthalates
- Some leathers have a PU coating; they could also contain Organotins and DMFa (as well as DMFu for PU-coated natural leathers)

To create your own testing protocol, you need to:

- Decide what kind of testing is required for each supplier (see Figure 5).
- Decide what testing is required for each product (see Figure 6 on the next page).
- Identify any chemical and physical testing required (see Figure 7 on the next page).

## 7 Tips for Deciding What to Test

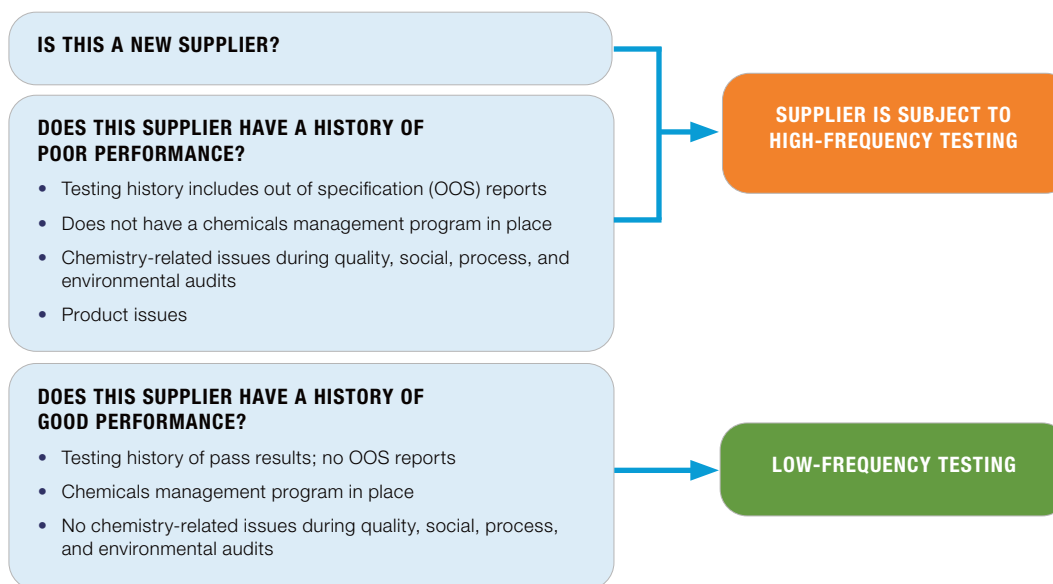
All new suppliers should be deemed high risk and subject to a high-frequency testing until a level of confidence is established.

Low-frequency testing can be implemented for all suppliers who have, at a minimum, met the following requirements:

- Supplier has a chemical management system in place (e.g. policy, internal control plan, collection of certificates, training, etc.) and has been certified by bluesign® or ZDHC on that topic.

- Supplier has historically performed well in testing (e.g. no fail results in the past 12 months).
- Supplier has historically performed well in the chemical aspects of quality, process, environment, and social audits.

Figure 5. Supplier Risk Assessment



- All products classified as toys (items designed for use in play for children 14 years old or younger) should be tested as such according to existing international standards (e.g., dressing up out-fits/disguise costumes, soft toys). It also applies to products that are not specifically sold as toys but have an obvious play value.

Note: This is not exclusively a chemical requirement, but can encompass several product safety requirements.

- All infant, baby, and children’s products are considered high risk and frequency of testing should reflect this as well as children’s specific chemical limits, restrictions, or bans.
- All continuity products (permanent offer) should be tested once per year or whenever changes to materials or processes are made.
- In addition to chemical testing, all products with a promotional claim on its function should be tested to prove the claim. This is not a chemical requirement, but is worth noting to prove compliance. For example:
  - Nightwear flammability
  - Stain resistant
  - Waterproof / water resistant
  - Non-iron

Figure 6. Product Risk Assessment

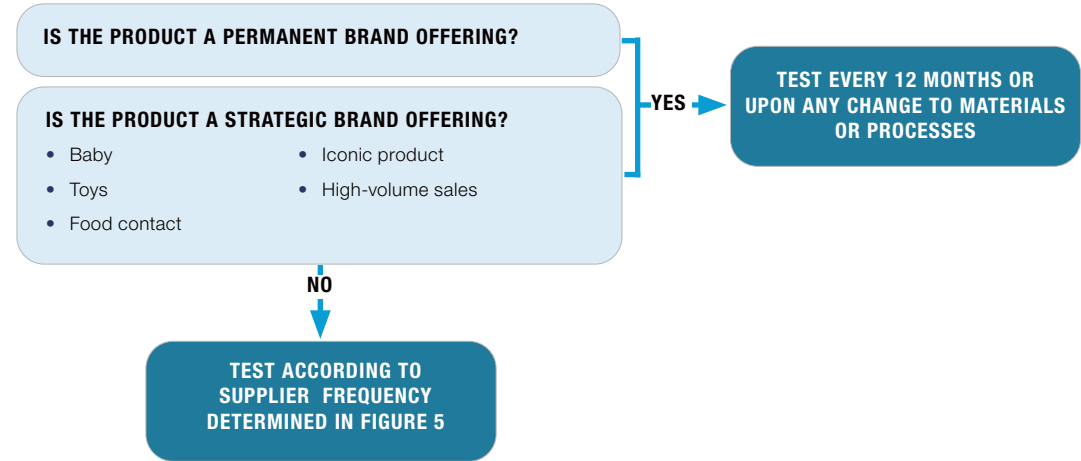


Figure 7. Testing Risk Assessment

