Introduction to the RSL Supplier Toolkit

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The RSL Supplier Toolkit

• WHAT?
  • A new document created by an AFIRM Working Group with cooperation from the American Apparel and Footwear Association (AAFA).
  • Overview of how to begin an implementation of an RSL program.

• WHY?
  • Most suppliers are under pressure regarding RSL requirements.
  • Many different companies, products and rules.
  • Explanation of why an RSL program is important to suppliers, brands, consumers and the environment.
Seven Parts

• Section I – Introduction to Restricted Substances
• Section II – The RSL
• Section III – What are the risks?
• Section IV – Educating the Supply Chain
• Section V – RSL Testing
• Section VI – RSL Implementation
• Section VII – RSL Links to AFIRM companies
Intro to the RSL Supplier Toolkit

Section I - Introduction

• What is a “Restricted Substance”

• Why are they restricted?

• How are they restricted?

• Purpose of the RSL.

• How companies use RSLs.
Section II – The RSL

- A company’s RSL depends on:
  - Their products
  - The markets they sell in
  - Ongoing Legislation

- As a supplier, it is necessary to manage several different RSLs at one time.
Section III – What (where) are the risks?

- Guidelines on where restricted substances can be found
- Example of a RSL testing program.
- Backgrounds on types of most common restricted substances

Example - Cadmium

<table>
<thead>
<tr>
<th>Description:</th>
<th>Cadmium is a naturally occurring and abundant metal that does not easily corrode (rust). It is often used for pigments, metal coatings, plastics (as a heat stabilizer), photographic films and batteries.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where Found:</td>
<td>In textiles and apparel, cadmium may be associated with plastics, pigments (particularly red, orange, yellow, and green), and as a surface layer for metals</td>
</tr>
</tbody>
</table>
RISK ASSESSMENT

Supplier

Is this a new supplier?

Yes

Test all products (see table 4)

No

Is this a good performing supplier?

Yes

Random testing of range (see table 4)

No

Is this a poor performing supplier?

Yes

Test all products until failure rate decreases

OOS Report

Less than 2 DD testing fails in last 12 months

No supplier issue

OOS Report

More than 2 testing fails in past 12 months

Supplier issues

Product issues

External issues
Section IV – Educating the Supply Chain

• How an RSL program travels the supply chain.

• Responsibilities of each member in the supply chain.

• Choosing and managing manufacturing partners.

• How to educate your suppliers.
Section V – RSL Testing

• Testing requirements and programs mandated by brands.

• Trust, but verify.

• How to qualify laboratory testing vendors.
Laboratory Qualification

Does the lab hold certifications or accreditations? From whom?
Does the lab follow GLP (Good Laboratory Practices) or ISO 17025 guidelines?
Does the lab have a Quality Policy Statement or other document stating general quality procedures?
What was the date and result of a recent external audit? Is a report available?
Does the lab belong to any private quality assurance organization?
Does the lab regularly participate in any round-robin or blind sample testing?
Is the lab open to a site visit or audit?
Are in-house protocols written and in manuals? Are they available?
Has the lab ever been denied or lost certification?
Is a list of key scientists, including degrees, certifications, etc., available?
Is a list of major, on-site analytical equipment available?
Is a list of reference methods the lab routinely performs available?
Is a list of sample handling and preparation capabilities available?
Approximately how many analyses are conducted per month or year?
What percentage of the lab’s analyses are subcontracted to a third party?
In what languages are reports available?
Are data processed by hand or computer?
Does the lab have an automated laboratory information management system (LIMS)?
Section VI – RSL Implementation

• “Model” Implementation Example
  • Step 1 – Internal Communication
  • Step 2 – Communication to Suppliers
  • Step 3 – Testing and Reporting Results
  • Step 4 – Continuous Improvement

Example: Footwear

Restricted Substances
  - AZO Dyes
  - Phthalates
  - Cadmium
  - Nickel
  - PCP

- Children's products only
- Fabrics / prints / synthetic parts in direct contact with the skin
- Metal parts in direct contact with the skin
- Natural fibres only

Fabrics / prints / synthetic parts in direct contact with the skin
Section VII – Brand RSL Examples

- Nike
  - [http://www.nikeresponsibility.com/rsl](http://www.nikeresponsibility.com/rsl)
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Appendix – Additional Resources

• Glossary
• Factory Management Plan
• Model RSL Management Plan
• Model Testing Program
• Best Practices to Avoid RSL Issues
• AFIRM FAQ
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Where do I get it?

• Go to: http://www.afirm-group.com/
Thank you.