BEST PRACTICES FOR COMPLIANCE

WHAT A PROCESSOR MUST DO TO COMPLY WITH RSL?

by

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The Processor has to Ensure that

- He has the current, latest edition of the RSL.
- He has Read the full contents of the RSL & understood them as applicable to his product mix.
- Has clarified doubts, if any, with the Brand Technologist.
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- Has Reviewed the whole production process sequence
- Listed out All Dyes & Chemicals in use at different stages of Processing:
  - Pre-Treatment (De-sizing, Scouring, Bleaching & Mercerising), Dyeing & Printing
- Finishing including all Speciality finished like Easy-care, Flame Retardant etc.
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- Has studied the Risk assessment of all Dyes & Chemicals used in his Production process with respect to the RSL Limits for Banned Substances.
- Has taken steps to Eliminate \ Substitute any Restricted Chemical, If in use.
- Has selected Dyes & Chemicals from “Compliant Dyes & Chemicals List.”
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- Purchasing Dyes & Chemicals from Responsible suppliers, for e.g., ETAD Registered Suppliers.
- Has communicated the correct RSL Requirement to the Dye & Chemical Supplier.
- Has taken Confirmation from the Supplier about the product supplied by them will comply with the Specifications of the RSL.
Once the Correct Supplier has been selected, ask him to provide

- Written Declaration for the products supplied by him, for meeting Compliance to RSL Limits.
- MSDS (Material Safety Data Sheet)
- To Deliver Product in Proper & Safe Packing with Correct Labelling displaying correct Product Name & Other Safety signs details for Storage, Handling & Transportation.
If the Supplier

- Declines to give Signed Declaration about Compliance to the RSL.
- Refuse to provide MSDS or provides Incomplete MSDS.
- Do Not Purchase Dyes or Chemicals from him.

Similarly, Return any Drum or Container which

- IS NOT PACKED PROPERLY &
- IS NOT LABELLED CORRECTLY.
The Processor must also take care of the other Sources of Restricted chemicals:

- Must check the Raw Textile Materials for banned Substances, for e.g, Cotton for Pesticides.
- Must check the Ancillary Chemicals used for Cleaning or Lubricating the machines or for Packing of the finished products.
Proper Process Control

Any un-controlled Textile Wet process Dyeing \ Printing or Finishing is risky & may lead to non compliance of the RSL, Hence

- The Processor must ensure that proper Standard Operating Procedures are their for all the Production Processes and

- All Process Control measures are strictly monitored at all stages of Processing by properly trained technicians.

- All Safety measures are followed with Proper use of PPE, where required.
The Processor Must Acquire ECO-LABELS, most suitable for their product mix, e.g., OKO-TEX STD 100.

- Oko-Tex Standard 100 matches with the Requirements of Most of the Brand RSL, up to 85-90%.

- For Test Parameters not covered under the Acquired label, for e.g., APEO with Oko-Tex Std.100, article must be checked periodically from Specified Eco-Labs for confirmation of compliance to the RSL.
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Precautions

The Processor must keep himself update with the latest information about:

- Changes in the Legal requirement
- Changes in the RSL Limits
- Feed back from Major Dyes & Chemical Suppliers about their recent findings about some of their products. e.g,

1) The Combination of Pigment Black 7 & Pigment Orange 13 or 34, may release the banned amine – 3,3’ – Dichlorobenzidine (Carcinogen) at levels above the specified level.
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1. A very heavy depth shade of Black > 130 g/l may fail for the banned amine: p – Chloroanilne.

2. Dibutyl tin compounds are also used as Catalyst in some polymeric agents (Adhesives, PVC & silicone based auxiliaries) and as a result of the production process for DBT, these products frequently contain small residual amount of banned substance TBT (Tributyl Tin).

3. Even Partial (10-30%) use of MTO in Pigment Printing results in traces of banned substance – CHLOROBENZENE.
ADVANTAGES OF COMPLIANCE

- REDUCES OCCURANCE OF FAILURES
- MINIMIZES THE RISK OF RECALLS
- MEET REGULATORY REQUIREMENT
- PROTECT THE CONSUMER
- PROTECT THE ENVIRONEMNT
- IMPROVED PRODUCT QUALITY.
- PROTECT BUSINESS
- ENHANCES THE IMAGE.
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THANK YOU