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Sadesa Restricted Substances Policy – Chemical Products

SADESA is fully aware of the need to protect our workers and the environment and based on the relevance of this issue, the Company supports limiting the use of substances defined as hazardous in the manufacturing process of its products.

The restriction of use of hazardous substances is also significantly important for our customers and that´s why our suppliers are expected to assist us to achieve the objective of full compliance with the restrictions on hazardous substances listed in this Policy and any other products or substances which may be restricted now or in future in all countries we do business.

SADESA is fully committed to work with the ZDHC MRSL (Zero Discharge of Hazardous Chemicals, Manufacturing Restricted Substances List) program, which relies on a listing of families of restricted substances for formulations used during the leather manufacturing processes. Acceptable concentration limits for each substance of family of substances is established, which can appear both as impurities or by-products in formulations used at the manufacture facilities.

Suppliers are responsible to ensure that content of each substance listed in the present Policy does not exceed the maximum allowed values.

Sampling and Testing System

To verify compliance with statements herein, each supplier shall annually send a report with the tests carried out at a certified laboratory (ISO 17025) for each chemical product delivered at SADESA, the substances to be tested shall be defined on the basis of the characteristics inherent to the synthesis process, formulation and/or eventual input impurities.

SADESA may perform sampling and testing on purchased products.
If any of the required agents is detected/exceeding limits, this would entail a transfer of responsibility upon an eventual claim and the test expenses generated will be debited to the supplier.

Testing Institutes

Testing institutes must be familiar with the corresponding testing methods and the following ones are recommended: Eurofins-BLC, SATRA, TÜV, INTERTEK, IQTC.

Any other institute officially accredited and certified in accordance with DIN/EN 45001 or DIN/ISO/IEC 17025 can also be used for testing.

We kindly ask you to sign the following statement of compliance:

The undersigned, a duly qualified Representative of the company, does hereby certify that all products and their components produced and shipped to SADESA factories comply with the SADESA Policy for Restricted Substances and meet all requirements included in the list and does assume the commitment to periodically validate said list on the link www.sadesa.com/sustainability/restrictedsubstances/

We further agree to be held for all costs incurred by SADESA and its customers, should any of the substances contained in our products breach contents of this Policy.

We confirm that we have received, read and fully understand the SADESA Policy for Restricted Substances.

Signature _____

Name _____

Title/Position _____

Company _____

Date _____

Restrictive Substance	CAS	TLV	Pre-treatment	Test Method
Substances included on IARC's list Group I as per last revision, http://monographs.iarc.fr/ENG/Classification/latest_classif.php		n.d.		
Teratogenic Substances		n.d.		
Mutagenic Substances		n.d.		
Substances with risk of damage to fertility and fetus (Reproductive Toxicity)		n.d.		
Antimony –extractable-	7440-36-0	5 ppm	DIN EN ISO 17072-1 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017) or DIN 38405, D32, (2000)
Arsenic –extractable-	7440-38-2	0.2 ppm	DIN EN ISO 17072-1 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017)
Arsenic –total content-	7440-38-2	10 ppm	DIN EN ISO 17072-1 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017)
Azo-dyestuffs (24 substances)		20 ppm	---	EN ISO 17234-1 (2015) det. of certain aromatic amines EN ISO 17234-2 (2011) det. 4-aminoazobenzene
2,4,5-trimethylaniline	137-17-7			
2,4-diaminoanisole	615-05-4			
2,4-dimethylaniline (=2,4-xylidine)	95-68-1			
2,4-toluylendiamine	95-80-7			
2,6-dimethylaniline (=2,6-xylidine)	87-62-7			
2-amino-4nitrotoluene	99-55-8			
2-methoxyaniline (=o-anisidine)	90-04-0			
2-naphthylamine	91-59-8			
3,3,'-dimethoxybenzidine	119-90-4			
3,3'-dichlorbenzidine	91-94-1			
3,3'-dimethyl-4,4'-diaminodiphenylmethane	838-88-0			
3,3'-dimethylbenzidine	119-93-7			
4,4'-diaminodiphenylmethane	101-77-9			
4,4'-methylen-bis(2-chloraniline)	101-14-4			
4,4'-oxydianiline	101-80-4			
4,4'-thiodianiline	139-65-1			
4-aminoazobenzene	60-09-3			
4-aminobiphenyl	92-67-1			
4-chlor-o-toluidine	95-69-2			
Benzidine	92-87-5			
m-toluidine	108-44-1			
o-aminoazotuluene	97-56-3			
o-toluidine	95-53-4			
p-chloraniline	106-47-8			
p-cresidine	120-71-8			
p-toluidine	106-49-0			

Restrictive Substance	CAS	TLV	Pre-treatment	Test Method
Navy Blue (EU-No.611-070-00-2)	118685-33-9	n.d.	---	GC-MS TEST
Aniline	62-53-3	5 ppm		ISO 17234-1:2015
Benzene	71-43-2	n.d.	---	GC-MS TEST
Benzo(a)pyrene (BaP)	50-32-8	1 ppm	---	ZEK 01.2-08
Butylated Hydroxytoluene (BHT)	128-37-0	n.d.	---	HPLC
C10-C13 Chloroalkanes Short Chained Chlorinated paraffins (SCCP)		100 ppm	DIN EN ISO 18219:2016-02	DIN EN ISO 18219:2016-02
C14-C17 Chloroalkanes Medium Chained Chloroparaffines (MCCP)		1000 ppm	DIN EN ISO 18219 (2016)	DIN EN ISO 18219 (2016)
DMF (dimethyl formamide)	68-12-2	n.d.	---	GC-MS TEST
DMFu (dimethyl fumarate)	624-49-7	0.1 ppm	ISO/TS 16186:2012	
Cadmium –extractable-	7440-43-9	0.1 ppm	DIN EN ISO 17072-1 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017) or DIN EN ISO 5961 (1995)
Cadmium –total content-	7440-43-9	40 ppm	DIN EN ISO 17072-2 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017) or DIN EN ISO 5961 (1995)
Chloroorganic Carriers (all chlorobenzenes and all chlorotoluenes) Chlorotoluenes Dichlorobenzenes Dichlorotoluenes Hexachlorobenzenes Pentachlorobenzenes Pentaclorotoluenes Tetrachlorobenzenes tetrachlorotoluenes Trichlorobenzenes Trichlorotoluenes		1 ppm	DIN 54232 (2010)	GC-MS TEST
Chrome VI –extractable-	7440-47-3 18540-29-9	3 ppm	DIN EN ISO 17075-1 (2017) or DIN EN ISO 17075-2 (2017) or LFGB §64 82.02-11(2008) Aging of the sample is required according to BS ISO 10195 (2018) Method A2 (24h, 80°C, max. 10%rH, usage of a non-ventilated oven)	DIN EN ISO 17075-1 (2017) or DIN EN 17075-2 (2017) or LFGB §64 82.02-11(2008)
Chromium –extractable- **- not applicable to tanning or retanning products based on Chrome III salts-**	7440-47-3	1 ppm	DIN EN ISO 105-E04 (2013) acid solution (1 hour extraction with 37ºC) or DIN EN ISO 16711-2 (2016)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017) or DIN EN 1233 (1996)
Cobalt –extractable-	7440-48-4	1 ppm	DIN EN ISO 17072-1 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017) or DIN 38406, E 24, (1993)
Copper –extractable-	7440-50-8	25 ppm	DIN EN ISO 17072-1 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017) or DIN 38406, E7 (1991)
Cresol	All isomers 1319-77-3	n.d.	---	GC-MS TEST
Cyclohexanone	108-94-1	n.d.	---	GC-MS TEST

Restrictive Substance	CAS	TLV	Pre-treatment	Test Method
Dimethylacetamide (DMAC)	127-19-5	n.d.	---	GC-MS TEST
Dimethylsulfoxide (DMSO)	67-68-5	n.d.	---	GC-MS TEST
Dioxins and furans		n.d.	---	GC-MS TEST
Ethylene glycol monobutyl ether	111-76-2	n.d.	---	GC-MS TEST
Flame Retardants of any type		n.d.	Extraction with THF	GC/MS or LC/MS
Formaldehyde –extractable-	50-00-0	16 ppm	DIN EN ISO 17226-1 (2019) DIN EN ISO 17226-2 (2019)	
Lead –extractable-	7439-92-1	0.2 ppm	DIN EN ISO 17072-1 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017) or DIN 38406, E6 (1998)
Lead –total content-	7439-92-1	40 ppm	DIN EN ISO 17072-2 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017) or DIN 38406, E6 (1998)
Mercury –extractable-	7439-97-6	0.02 ppm	DIN EN ISO 17072-1 (2019)	DIN EN ISO 12846 (2012) or DIN EN ISO 17294-2 (2017)
Mercury –total content-	7439-97-6	0.5 ppm		DIN EN ISO 17072-2:2017
Methyl chloride (MC)	74-87-3	n.d.	---	GC-MS TEST
Methylene chloride (MC)	75-09-2	n.d.	---	GC-MS TEST
n-Hexane	92112-69-1	n.d.	---	GC-MS TEST
Nickel –extractable-	7440-02-0	0.5 ppm	DIN EN ISO 17072-1 (2019)	DIN EN ISO 11885 (2009) or DIN EN ISO 17294-2 (2017) or DIN 38406, E11 (1991)
n-Nitrosamines N-Nitrosopiperidine N-Nitrosodiethylamine N-Nitrosomorpholine N-Nitroso-N-ethylaniline N-Nitroso-N-methylaniline N-Nitrosodiprophylamine N-Nitrosodimethylamine N-Nitrosodibutylamine N-Nitrosopyrrolidine	 100-75-4 55-18-5 59-89-2 612-64-6 614-00-6 621-64-7 62-75-9 924-16-3 930-55-2	n.d.	---	GB/T 24153-2009 (detection limit 0.5ppm)
Ethyl methyl pyrrolidine	765-79-7	n.d.	---	GC-MS TEST
n-methyl pyrrolidone (NMP)	872-50-4	n.d.	---	GC-MS TEST
Ozone Depleting substances		n.d.	---	GC-MS TEST

Restrictive Substance	CAS	TLV	Pre-treatment	Test Method
Disperse dyes and dyestuffs		n.d.	---	DIN 54231 (2005) Detection limit depending on dye
acid red 26	3761-53-3			
basic blue 26	2580-56-5			
basic red 9	569-61-9			
basic violet 3	548-62-9			
basic violet 14	632-99-5			
direct black 3	6227-04-9			
direct black 6	-			
direct black 28	6745-67-1			
direct black 38	1937-37-7			
direct blue 6	2602-46-2			
direct brown 95	16071-86-6			
direct red 28	573-58-0			
disperse blue 1	2475-45-8			
disperse blue 3	2475-46-9			
disperse blue 7	3179-90-6			
disperse blue 26	3860-63-7			
disperse blue 35	12222-75-2			
disperse blue 102	12222-97-8			
disperse blue 106	12223-01-7			
disperse blue 124	61951-51-7			
disperse brown 1	23355-64-8			
disperse orange 1	2581-69-3			
disperse orange 3	730-40-5			
disperse orange 11	82-28-0			
disperse orange 37/59/76	12223-33-5*			
disperse orange 149	85136-74-9			
disperse red 1	2872-52-8			
disperse red 11	2872-48-2			
disperse red 17	3179-89-3			
disperse red 151	61968-47-6			
disperse yellow 1	119-15-3			
disperse yellow 3	2832-40-8			
disperse yellow 7	6300-40-8			
disperse yellow 9	6373-73-5			
disperse yellow 23	6250-22-3			
disperse yellow 39	12239-29-2			
disperse yellow 49	54824-37-2			
disperse yellow 56	54077-16-6			
solvent red 23	85-86-9			
navy blue - consists of: dinatrium-(6-(4-anisidino)-3-sulfonato2-2-(3,5-dinitro-2-oxidophenylazo)-1-(naphtolato)(1-(5-chlor-2-oxidophenylazo)-2-naphtolato)chromat (1-);Trinatrium bis(6-(4-anisidino)-3-sulfonato-2-(3,5-dinitro-2-oxidophenylazo)-1-(naphtolato)chromat(1-)				
* disperse orange 59 and disperse orange 76 are synonymic names for disperse orange 37				

Restrictive Substance	CAS	TLV	Pre-treatment	Test Method
Toluene	108-88-3	n.d.	---	GC-MS TEST
Toluene diisocyanate	91-08-7 584-84-9	n.d.	---	GC-MS TEST
Σ Alkyl phenols (e.g. NP, OP, etc)		n.d.	Extraction with dichloromethane	GC/MS or LC/MS (detection limit 10ppm)
Σ Alkyl phenols ethoxilates (e.g. NPEO, OPEO, etc)		n.d.	DIN EN ISO 18218-1	DIN EN ISO 18218-1 (detection limit 10ppm)
Phthalates All esters of –phtalic acid including but not restricted to: 1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear 1,2-Benzenedicarboxylic acid, diphenyl ester, branched and linear Bis(2-methoxyethyl) phthalate (DMEP) butyl benzyl phthalate (BBP) di(2-ethylhexyl)-phthalate (DEHP) dibutyl phthalate (DBP) di-C6-8-branched alkylphthalates (DIHP) di-C711-branched alkylphthalates (DHNUP) di-cyclo-hexyl phthalate (DCHP) di-ethylphthalate diisobutyl phthalate (DIBP) di-isodecyl phthalate (DIDP) di-isononyl phthalate (DINP) di-iso-octyl phthalate (DIOP) Diisopentylphthalate (DIPP) di-methylphthalate di-n-hexylphthalate (DHP) di-n-octyl phthalate (DNOP) di-nonyl phthalate (DNP) di-n-propyl phthalate (DPrP) di-pentylphthalate (DPP) N-pentyl-isopentyl phthalate (NPIPP)	 68515-50-4 84777-06-0 117-82-8 85-68-7 117-81-7 84-74-2 71888-89-6 68515-42-4 84-61-7 84-66-2 84-69-5 26761-40-0 28553-12-0 27554-26-3 605-50-5 131-11-3 84-75-3 117-84-0 84-76-4 131-16-8 131-18-0 776297-69-9	500 ppm	DIN EN ISO 14389 (2014)	DIN EN ISO 14389 (2014) or CPSC-CH-C1001-09.4 (2018)
o-phenyl-phenole (o-PP)		50 ppm	extraction with KOH (16 h at 90ºC)	GC-MS or DIN EN ISO 13365 (2011)
Triclosan	3380-34-5	50 ppm	extraction with KOH	DIN EN ISO 13365 (2011)
Σ Pentachlorophenol (PCP), Tetrachlorophenol (TeCP) and Trichlorophenol (TriCP)		0.05 ppm	extraction with KOH (16 h at 90ºC) Derivatization acc. To ISO 17070 (2015) *in case of value near TLV (+/-10%) re-test with reference method ISO 17070 (2015)	GC-MS TEST*
Phenol	108-95-2	10 ppm	---	EN 71-9 (2007) (TLV) EN 71-10 (2006) (Method)
Polychlorinated Biphenyls (PCB's)	1336-36-3	n.d.	---	DIN 38407, F2 (1993)
Polychlorinated Terphenyls (PCT's)		n.d.	---	DIN 38407, F2 (1993)
Polyvinylchloride (PVC)	9002-86-2	n.d.	---	Infrared Analysis
Tetrahydrofuran (THF)		n.d.	---	GC-MS TEST

Restrictive Substance	CAS	TLV	Pre-treatment	Test Method
4,4'-methylenebis(2-chloroaniline) (MOCA)		n.d.	---	GC-MS TEST
Total Zirconium + Aluminium + Titanium		20 ppm	---	DIN 105-E04/ICP-OES, AAS
Solvents (VOC)		1000 ppm	---	GC-MS TEST
1,1,1,2-Tetrachloroethane	630-20-6			
1,1,1-Trichloroethane	71-55-6			
1,1,2,2-Tetrachloroethane	79-34-5			
1,1,2-Trichloroethane	79-00-5			
1,1-Dichloroethylene	75-35-4			
Pentachloroethane	76-01-7			
Tetrachlorethylene	127-18-4			
Tetrachloromethane (carbon tetrachloride)	56-23-5			
Trichloroethylene (TCE)	79-01-6			
Dibutyltin (DBT)	1002-53-5	0.2 ppm	ISO/TS 16179 (2012)	
Dioctyltin (DOT)	15231-44-4	1 ppm	ISO/TS 16179 (2012)	
Monobutyltin (MBT)	787863-54-9	1 ppm	ISO/TS 16179 (2012)	
Monooctyltin (MOT)	94410-07-8	1 ppm	ISO/TS 16179 (2012)	
Tributyltin (TBT)	56573-85-4	0.025 ppm	ISO/TS 16179 (2012)	
Tricyclohexyltin	3091-32-5	1 ppm	ISO/TS 16179 (2012)	
Trimethyltin (TMT)	-	1 ppm	ISO/TS 16179 (2012)	
Trioctyltin (TOT)	2587-76-0	1 ppm	ISO/TS 16179 (2012)	
Triphenyltin (TPhT)	668-34-8	0.5 ppm	ISO/TS 16179 (2012)	
Tripropyltin	2279-76-7	1 ppm	ISO/TS 16179 (2012)	
Σ Tri substituted organotin compounds		1000 ppm refer to tin content	ISO/TS 16179/2012	
Organotin compounds – Others		0.050 ppm	With methanolic buffer with carbamate	Acc. To ISO 17353 (2005)
Xylene –all isomers-	1330-20-7	n.d.	---	GC-MS TEST
Σ Pesticides & Insecticides		0.5 ppm	Extraction with acetone/hexane	GC-MS
α-Hexachlorcychlohexane	319-84-6			
γ-Hexachlorcyclohexane	608-73-1			
2-(2,4,5-trichlorophenoxy) propionic acid (2,4,5-TP), its salts, and 2-(2,4,5-trichlorophenoxy) propionyl compounds				
2,4,5-T	95-95-4			
2,4,5-trichlorophenoxyacetic acid (2,4-T), its salts and 2.4,5-trichlorophenoxyacetyl compounds				
2,4-D	94-75-7			
Aldicarb	116-06-3			
Aldrine	309-00-2			
Alpha and Beta Endosulfanes	115-29-7			
Carbaryle	63-25-2			
Captafol	2425-06-1			
Chlordane	57-74-9			
Chlordecone (kepone)	143-50-0			
Chlordimeform	6164-98-3			
Chlorfenvinphos	470-90-6			

Restrictive Substance	CAS	TLV	Pre-treatment	Test Method
Chlorobenzilate	510-15-6			
Chlorthalonil	All isomers			
Cyhalothrin	91465-08-6			
DDD	72-54-8			
DDE	72-55-9			
DDT	50-29-3			
Deltamethrin	52918-63-5			
Diazinon	333-41-5			
Dichlofenthion	97-17-6			
Dichlofluanide	1085-98-9			
Dicofol	115-32-2			
Dieldrine	60-57-1			
Dinoseb, its salts & compounds	88-85-7			
Endosulfanes				
Endrine	72-20-8			
Ethylparathione –Parathion-	56-38-2			
Fenchlorphos	299-84-3			
Fenvalerate	51630-58-1			
Halogenated diarylalkanes				
Halogenated diphenyl methanes				
Halogenated naphtthalenes				
HCH's without Lindane				
Heptachlor	76-44-8			
Heptachloroepoxide	1024-57-3			
Hexachlorobenzene	118-74-1			
Isodrine	465-73-6			
Kelevane	4234-79-1			
Kepone	143-50-0			
Lindane	58-89-9			
Malathione	121-75-5			
Methoxychlor	72-43-5			
Methyl Parathion	298-00-0			
Mirex	2385-85-5			
Monocrotophos	6923-22-4			
Monomethyl-dibromo-diphenyl methane	99688-47-8			
Monomethyl-dichloro-diphenyl methane	81167-70-8			
Monomethyl-tetrachloro-diphenyl methane	76253-60-6			
Pentachloroanisole	1825-21-4			
Permethrine	52645-53-1			
Perthane	72-56-0			
Quintozene	82-68-8			
Strobane	8001-50-1			
Telodrin	297-78-9			
Timiperone (DTTB)	57648-21-2			
Tolylfluanide	731-27-1			
Toxaphene	8001-35-2			
Trifluraline	1582-09-8			

Restrictive Substance	CAS	TLV	Pre-treatment	Test Method
β-He xachlorcyclohexane	58-89-9 319-85-7			
Heavy Metals –infants/toddlers-				EN71-3:2013 + A1:2014
Aluminium (Al)	7429-90-5	10 ppm		
Antimony (Sb)	7440-36-0	10 ppm		
Arsenic (As)	7440-38-2	10 ppm		
Barium (Ba)	12047-27-7	10 ppm		
Boron (B)	7440-42-8	10 ppm		
Cadmium (Cd)	7440-43-9	n.d.		
Chrome VI	18540-29-9	n.d.		
Chromium	7440-47-3	n.d.		
Cobalt (Co)	7440-48-4	n.d.		
Copper (Cu)	7440-50-8	10 ppm		
Lead (Pb)	7439-92-1	n.d.		
Manganese (Mn)	7439-96-5	10 ppm		
Mercury (Hg)	7439-97-6	n.d.		
Nickel (Ni)	7440-02-0	n.d.		
Selenium (Se)	7782-49-2	10 ppm		
Strontium (Sr)	7440-24-6	10 ppm		
Tin (Sn)	7440-31-5	n.d.		
Zinc (Zn)	7440-66-6	10 ppm		
2-Methoxyethanol	109-86-4	100 ppm	---	GC-MS TEST
2-Ethoxyethanol	110-80-5	100 ppm	---	GC-MS TEST
2-Ethoxyethyl acetate	111-15-9	100 ppm	---	GC-MS TEST
Boric acid	10043-35-3 11113-50-1	100 ppm	---	GC-MS TEST
Disodium tetraborate, anhydrous	12179-04-3 1303-96-4 1330-43-4	100 ppm	---	GC-MS TEST
Tetraboron disodium heptaoxide, hydrate	122267-73-1	100 ppm	---	GC-MS TEST
Perfluorinated and Polyfluorinated Chemicals (PFCs) Beginning January 1, 2015: durable water, oil and stain repellent finishes (fluorinated polymers) based on long-chain technology are banned from Intentional use by ZDCH signatory brands. Long-chain compounds according to the OECD definition (http://www.oecd.org./ehs/pfc/) are based on long-chain perfluorocarboxylic acids (C8 and higher) and on long-chain perfluoroalkyl sulfonates (C6 and higher). The main contaminants of this technology include: - Perfluroalkyl sulfonates (PFSAs) with carbon chain lengths C6 and higher (e.g., PFOS, perfluorooctane sulfonate) - Perfluorocarboxylic acids with carbon chain lengths C8 and higher (e.g., PFOA, perfluorooctanoic acid)			prISO/FDIS 23702-1 (2018)	
Perfluorooctane sulfonate (PFOS) and related substances	Multiple	2 ppm (sum)		
Perfluorooctanoic acid (PFOA)	335-67-1	2 ppm		

Restrictive Substance	CAS	TLV	Pre-treatment	Test Method
Products from Ospar list		n.d.		
Products under EU Water Frame Work Directive		n.d.		
ZDHC MRSL https://mrsl.roadmaptozero.com/		n.d.		
Reach list (except for those substances included specifically in this RSL which TLV is more demanding) http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp		n.d.		

tlv = threshold limit value
ppm = mg/kg
n.d.= not detected