

<b>Product Responsibility Best Practices</b>	<b>SUBJECT</b> Restricted Substances Compliance		<b>LAST UPDATE</b> July 2018
	<b>APPLIES TO</b> • Suppliers • Distributors	<b>FOCUS ON</b> Reducing the use of hazardous chemicals and substances that are harmful to human health and the environment	
	<b>QUICK LINKS</b> • PPAI Corporate Responsibility: <a href="http://www.ppai.org/corporate-responsibility/">www.ppai.org/corporate-responsibility/</a> • UL: <a href="http://industries.ul.com/premiums-promotional-and-licensed-goods">industries.ul.com/premiums-promotional-and-licensed-goods</a> • Consumer Product Safety Commission: <a href="http://www.cpsc.gov">www.cpsc.gov</a>		<b>Intended for intermediate compliance programs</b>

*Italic grey text indicates a hyperlink listed in the Online Resources section of this document.*

## What Are Restricted Substances?

Restricted substances are chemicals and other substances that have been determined to present a human and environmental health hazard. Consequently, they are controlled by government laws and regulations. Restricted substances can be found in a variety of products. Due to the abundance of products in the promotional products industry, awareness of restricted substance regulations is essential to any effective compliance program.

## Management of Restricted Substances

Companies should develop policies and procedures that define protocols and expectations of vendors related to restricted substances.

1. Require factories that make or supply raw materials and finished products to be aware of your restricted substance policies and be up-to-date on the current restricted substances list (RSL). Companies can adopt the restricted substances lists of the American Apparel and Footwear Association (AAFA), Nike, or other RSLs that are appropriate for your product line and available online.
  - The AAFA RSL is widely recognized as the most current list, as it is reviewed and updated every six months with the latest versions made available for free to the apparel and footwear industry.
    - The AAFA RSL is also available in Vietnamese, Tieng Viet, Chinese and Spanish
  - The Nike RSL and Sustainable Chemistry Guidance (SCG) is widely recognized as the most product-calibrated and comprehensive RSL.
    - Nike also provides a specific packaging restricted substances list (PRSL).
2. Ensure that all subcontractors, raw materials suppliers, ink suppliers and chemical suppliers, etc., are aware of your policies and have the latest version of the RSL that your company has adopted available for reference.
  - All production partners, including subcontractors and raw materials suppliers, must monitor their use of chemicals to adequately reduce risk by establishing periodic reviews of inks, paints, additives, plastics and other materials to ensure continued compliance with RSL.
3. Only do business with RSL-compliant vendors and suppliers.
4. Encourage the use of materials, chemicals, and printing supplies from reputable manufacturers only.
  - Reputable chemical or materials suppliers will be able to provide necessary technical data sheets on most, if not all, materials online.
5. Require chemical suppliers to provide safety data sheets or SDS for all chemicals and raw materials supplied.
  - These documents often can reveal whether the materials used are free from the restricted substances listed in the RSL.
6. Establish a bill of materials approval process for products and components to provide safeguards for mitigating risks associated with restricted substances.
7. Conduct third-party testing on components and finished products on a regular basis. Identify the “usual suspects” or high-risk chemicals that can be used in making component materials as a starting point for RSL identification and testing.
8. Understand and communicate that all parties in the supply chain should work to understand the chemistry and where restricted substances can be found.

## Online Resources:

### AAFA Restricted Substances List:

[https://www.aafaglobal.org/AAFA/Solutions\\_Pages/Restricted\\_Substance\\_List](https://www.aafaglobal.org/AAFA/Solutions_Pages/Restricted_Substance_List)

### Nike Restricted Substances List:

<https://about.nike.com/pages/chemistry-restricted-substances-list>

### European REACH Restricted Substances:

<https://echa.europa.eu/substances-restricted-under-reach>

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