

CHEMICALS MANAGEMENT 101

RESTRICTED SUBSTANCES LIST (RSL)

OVERVIEW

Chemicals management is about protecting people, the environment, product quality and brand reputation by making better choices about how chemicals are used to create materials and products.

An important step in building a chemicals management program is the implementation of a **Restricted Substances List (RSL)** that limits or bans certain chemicals in finished products. However, an effective chemicals management program should go beyond a RSL and should also include the following important elements:

- A means to stay up to date with legal requirements concerning chemical use;
- Awareness about the chemicals used in production and present in finished products and their impacts;
- A system to ensure RSL and/or regulatory compliance expectations are upheld;
- A system for sourcing materials that ensures appropriate chemicals management practices are in place;
- Proactive processes to identify and replace chemicals of concern used throughout the manufacturing process with preferred alternatives, beyond regulatory compliance.

The following checklist provides steps to get started in identifying chemical risk areas and establishing a chemicals management approach for your organization.

FOUNDATIONAL ACTIONS CHECKLIST

- ☐ Ask your suppliers if they have implemented a RSL(s), how the RSL was developed or where it was adopted from, and what chemicals management practices, programs or processes they have in place to ensure compliance.
 - Gathering information on existing supplier practices will help your organization have a baseline to measure progress from as you make improvements.
 - Reviewing resources like *OIA's Getting Started Guide for Brands in Chemicals Management* and supplier results from the *Higg Index Facility Environmental Module (FEM)* can help identify potential gaps or areas for improvement.
- ☐ Identify whether to develop a proprietary RSL or adopt an existing third-party RSL. Your RSL should cover all your materials and include at least the lowest applicable global regulatory limits for the manufacture and sale of your products.
 - Leveraging a widely-adopted RSL that is administered by a credible third-party organization (see examples below) is an effective and efficient approach that can reduce workload for both you and your suppliers.
 - In highly specialized product categories, or categories where applicable third-party RSLs do not exist, partner with your suppliers to understand key chemical risks that are applicable to your product category and develop a RSL that addresses those risks.
- ☐ Establish a means to implement your brand's RSL and identify emerging risks.
 - Update and communicate your RSL to your suppliers periodically.
 - Assess your suppliers' practices and processes to ensure they have successfully implemented the RSL. This could involve input-stream management, testing, or both. e.g. see *Model Brand Program for Testing Clothing* in the AFIRM Supplier Toolkit: http://www.afirm-group.com/wp-content/uploads/2017/03/AFIRM_toolkit_2017_0317a.pdf
 - Consider partnering with a third-party service provider(s), such as a testing lab, factory auditing program or material certification platform – to confirm compliance with your RSL, identify emerging risks, and identify opportunities to elevate your chemicals management program beyond compliance.
 - Keep your RSL up-to-date by reviewing potential substances of concern from global regulators, those substances flagged as potential concerns where more research is sought. Consider phasing these out over time and/or migrating to your RSL (see *OIA's Chemicals of Concern one-pager*).
- ☐ Explore opportunities to continuously elevate your chemicals management practices by reviewing *OIA's Getting Started Guide for Brands in Chemicals Management*, utilizing the OIA Sustainability Bootcamps, or partnering with another credible sustainability consulting firm.
 - For more information about the upcoming OIA Sustainability Bootcamps, please email sustainability@outdoorindustry.org.

KEY RESOURCES

For additional guidance on chemicals management, visit:	OIA Getting Started Guide for Brands in Chemicals Management: https://outdoorindustry.org/sustainable-business/chemicals-management/ OIA Chemicals Management Guide & Training for Manufacturers: https://outdoorindustry.org/sustainable-business/cm-docs The Higg Index Brand & Retailer Module (BRM) and Facilities Environmental Module (FEM): https://apparelcoalition.org/the-higg-index/
For widely-adopted third-party RSLs relevant to the outdoor industry, visit:	American Apparel and Footwear Association (AAFA) RSL Apparel and Footwear International RSL Management (AFIRM) RSL bluesign RSL OEKO-TEX Standard 100 RSL