

Statement of Compliance regarding Azo Dyes



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On behalf of TFL Ledertechnik GmbH we can confirm that leather which is coloured using azo dyes of the:

SELLA[®] FAST, SELLA[®] COOL, SELLA[®] STAR, SELLA[®] FLUID, SELLA[®] CAR, SELLA[®] WOOL, SELLA[®] DERM, SELLASET[®] and SELLAFLOR[®]

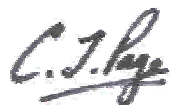
ranges, will comply with the EU Regulation 1907/2006 (REACH), as well as the German Consumer Goods Act (Bedarfsgegenständerverordnung). The dyed leather will pass an analytical test according to the official EN ISO 17234-1 test method for leather.

These azo dyes in the above ranges are sold in the European Union and world-wide for the leather industry.

The products should be handled as recommended in TFL technical literature, i.e. technical leaflets and especially the safety data sheet, which is highly recommended for safety aspects and for environmental management consultation.

Our recommendations are in line with our present state of knowledge. They do not, however, exempt the customer from performing his own tests to determine the suitability of the supplied products for their intended purposes. Application of the products lies outside the scope of our control and therefore comes within the customer's sphere of responsibility.

On behalf of TFL Ledertechnik GmbH



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Regulation on azo-dyes – Situation statement – July 2010

EU Regulation 1907/2006 (which includes the EU Directive 2004/21/EC, 2003/3/EC and 2002/61/EC) and the German Consumer Goods Act

Background

Germany: In 1994 the second amendment to the original 1992 German Consumer Goods Regulations introduced a prohibition on the production, import and sale of garments and fabrics in Germany dyed with certain azo colorants. Forbidden are only those small number of azo dyes, which can break down under reductive conditions to release any one of 22 defined aromatic amines. The consumer goods affected are those that are considered to have regular skin contact.

Europe: In July 2002, the European Parliament accepted the 19th amendment of the Council Directive CD 76/769/EEC and issued the European Directive 2002/61/EC. This EU Directive is similar to the original German Consumer Goods Regulation. The Directive came into effect in the EU countries from September 2003.

Current situation

From September 2003 all EU countries have prohibited the manufacture and sale of those defined consumer goods, which on chemical analysis are found to contain the listed aromatic amines originating from a small number of azo dyes. **Leather articles coloured with all other azo dyes can be manufactured and sold without restriction.**

A limit of 30 mg/kg for each amine has been established as the acceptable level for the 22 prohibited amines when analysed according to the official method for leather.

In 2006 the EU Regulation 1907/2006, commonly known as REACH, was introduced and this regulation is mandatory for all EU countries. The REACH regulation included all the existing EU Directives on chemicals, so this means the EU Directives regulating azo colorants (2004/21/EC, 2003/3/EC and 2002/61/EC) are automatically included in the REACH regulation.

The EU Directive 2004/21/EC established harmonised testing methods within the EU. **For leather the official European analytical method is EN ISO 17234-1 : 2010 (an up-dated version of the CEN ISO/TS 17234 : 2003).**

Special rules apply to the amines 2-naphthylamine and 4-aminodiphenyl due to the possibility of false positives.

A suitable analytical procedure to detect 4-aminoazobenzene is in development. It will be published shortly as EN ISO 17234-2.

Forbidden blue colorant

The EU Regulation 1907/2006 (originally in EU Directive 2003/03/EC) bans the use of a blue colorant, Index No. 611-070-00-2. According to our knowledge this forbidden blue colorant has never been sold to the world-wide leather industry. No samples have been able to be located, so, regardless what some specifications state, it is not possible to analyse for this colorant.

Table: List of aromatic amines according to the EU Regulation 1907/2006 (originally in Directive 2002/61/EC).

No.	Substance	CAS number
1 ***	4-aminodiphenyl	92-67-1
2	benzidine	92-87-5
3	4-chloro-o-toluidine	95-69-2
4 ***	2-naphthylamine	91-59-8
5 *	4-amino-2',3-dimethylazobenzene	97-56-3
6 *	2-amino-4-nitrotoluene	99-55-8
7	4-chloroaniline	106-47-8
8	2,4-diaminoanisole	615-05-4
9	4,4'-diaminodiphenylmethane	101-77-9
10	3,3'-dichlorobenzidine	91-94-1
11	3,3'-dimethoxybenzidine	119-90-4
12	3,3'-dimethylbenzidine	119-93-7
13	3,3'-dimethyl-4,4'-diaminodiphenylmethane	838-88-0
14	4-cresidine	120-71-8
15	4,4'-methylene-bis-(2-chloroaniline)	101-14-4
16	4,4'-oxydianiline	101-80-4
17	4,4'-thiodianiline	139-65-1
18	2-aminotoluene	95-53-4
19	2,4-diaminotoluene	95-80-7
20	2,4,5-trimethylaniline	137-17-7
21	2-methoxyaniline	90-04-0
22 **	4-aminoazobenzene	60-09-3
23 ****	2,4-xylylidine	95-68-1
24 ****	2,6-xylylidine	87-62-7

* amines 5 and 6 are analysed indirectly via reduction to the amines 18 and 19 respectively

** analytical procedure for 4-aminoazobenzene will shortly be published as EN ISO 17234-2

*** not able to be unequivocally confirmed by chemical analysis alone

**** the amines 23 & 24 are not listed in the EU Regulation but are in the Chinese Standard and requested in some specifications.