



Statement of compliance regarding Azo Dyes

On behalf of TFL Ledertechnik GmbH we can confirm that leather coloured using Azo dyestuffs from the following TFL dye ranges:

SELLA® Cool,
SELLA® Derm,
SELLA® Fast,
SELLA® Star,
SELLA® Wool,
SELLAFLO®R,
and SELLASET®

will comply with the EU Regulation 1907/2006 (REACH), as well as the German Consumer Goods Act (Bedarfsgegenständerverordnung) and the Chinese Standard GB 20400-2006. The dyed leather will pass an analytical test according to the official EN ISO 17234-1 test method for leather.

These Azo dyestuffs in the above dye 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 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
Corporate Product Quality, Ecology & Testing,
TFL Ledertechnik AG,
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Annex:

EU Regulation 1907/2006, the German Consumer Goods Act and the Chinese Standard 20400-2006.

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. Subsequently 2 further EU Directives for Azo colorants, 2003/3/EC and 2004/21/EC, were issued.

Current situation

From September 2003 all EU countries have prohibited the manufacture and sale of those consumer goods, which on chemical analysis are found to contain any of the restricted aromatic amines originating from Azo dyes. All other Azo dyes for colouring leather can be manufactured and sold without restriction. The EU Regulation has a limit of 30 mg/kg for each of the 22 prohibited amines, when the leather consumer good is analysed according to the official test method for leather. The restricted aromatic amines are listed in the Table, see next page.

In 2006 the EU Regulation 1907/2006, commonly known as REACH, was introduced. This Regulation is mandatory for all EU countries. The REACH Regulation included all the existing EU Directives on chemicals, so this means all the EU Directives regulating Azo colorants are automatically included in the REACH regulation. The EU Regulation also defines the testing methods to be used for leather and other substrates. For leather, the official European analytical method is EN ISO 17234-1.

Please note: special rules apply to 2-naphthylamine and 4-aminodiphenyl due to the possibility of false positives in the analytical procedure. A suitable analytical method to detect 4-aminoAzobenzene has been developed; it is published as EN ISO 17234-2. Sometimes lower analytical limits, for example, 20 ppm per amine are requested. For the analysis of extracts from leather this limit is too low for reliable analytical results. Extensive laboratory ring trials indicated that even the EU limit of 30 ppm was difficult to achieve reliably for some of the restricted amines.

Chinese Standard, GB 20400-2006

The Chinese Standard GB 20440 was introduced in 2006. It restricts the same 22 aromatic amines as in the EU Regulation and in addition also 2 further aromatic amines, 2,4-xylidine and 2,6-xylidine.

Forbidden “blue colorant”

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

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Table:

List of aromatic amines according to the EU Regulation 1907/2006 and Chinese Standard GB 20400-2006

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-xylidine	95-68-1
24 ****	2,6-xylidine	87-62-7

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

** there is a separate analytical procedure for 4-aminoAzobenzene, 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 they are in the Chinese

Standard 20400-2006 and are requested in some specifications.

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