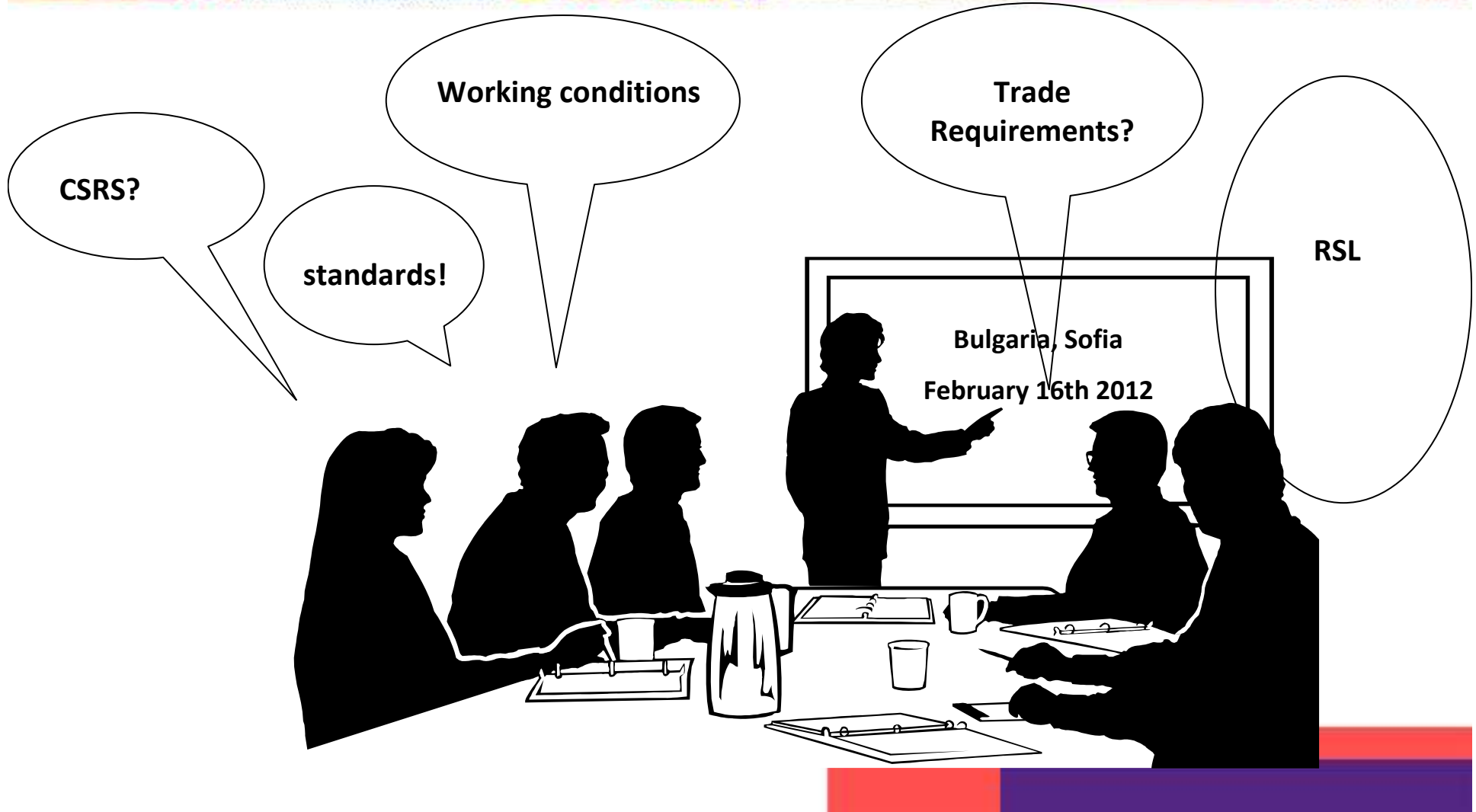




# Bulgaria, Sofia International Forum

Antonio F. Barberi Ettaro  
Senior consultant international trade  
[barberi@modint.nl](mailto:barberi@modint.nl)





# MODINT Association

- Over 700 members
- € 9 billion turnover
- Of which 50% export
- 75 staff (fte: 62)





# MODiNT

Ondernemersorganisatie voor mode, interieur, tapijt en textiel



## MODE



Verenigde Textielindustrie Nederland  
LEDENGROEPING VAN MODINT

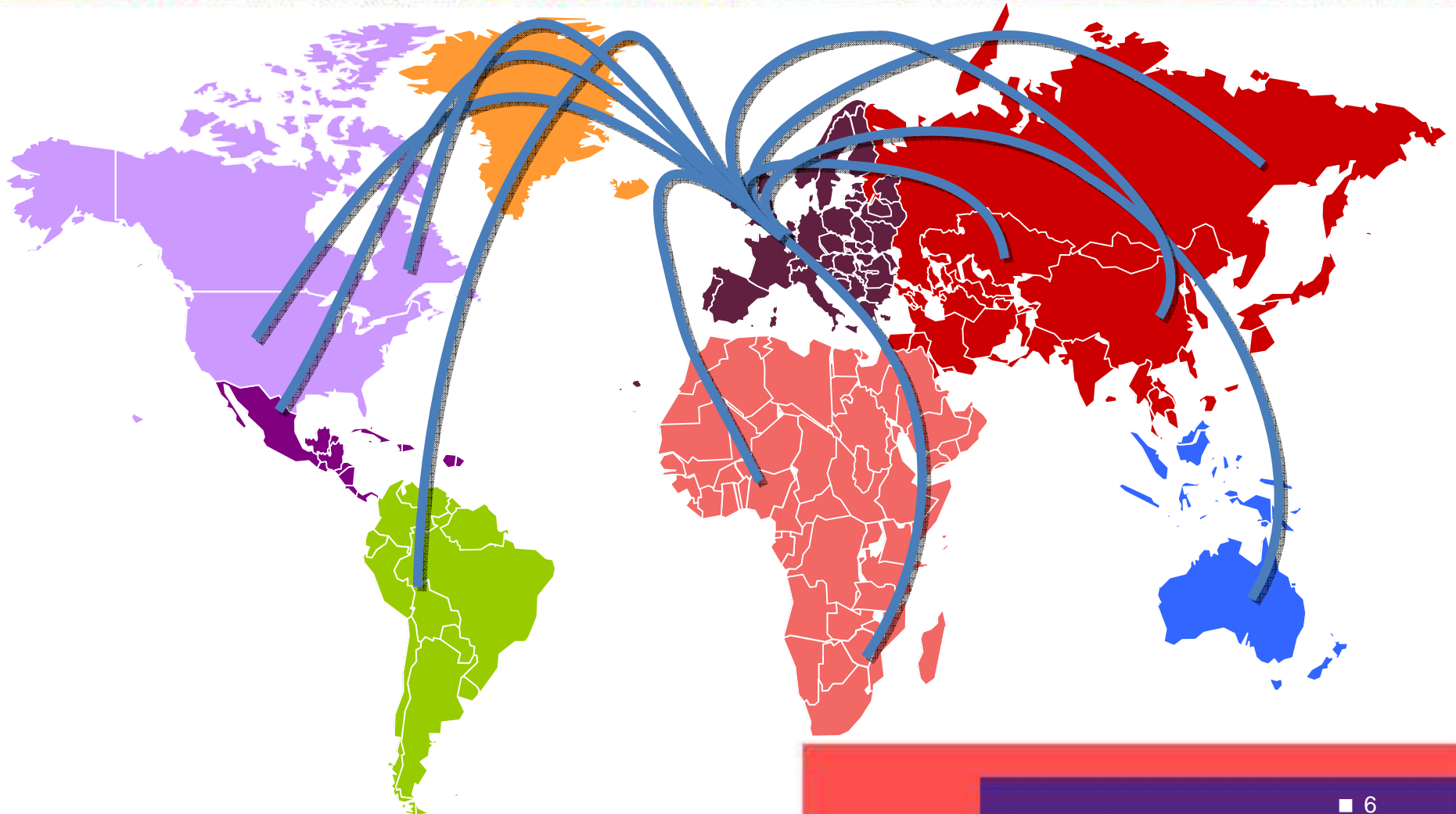


LEDENGROEPING VAN MODINT



MODINT supports business ...







# MODINT - Buying & Production

- Trade policy & Custom affairs
- Outsourcing
- Quality support (Sizing, Quality manuals, buying requirements)
- CSRS = Corporate Social Responsibility and Sustainability



## Content Presentation in two parts

- Corporate Social responsibility and Sustainability, the Modint view
- Product safety requirements & Environmental issues (some legal aspects)





- PART 1:
- The Modint view
- Corporate Social responsibility and sustainability

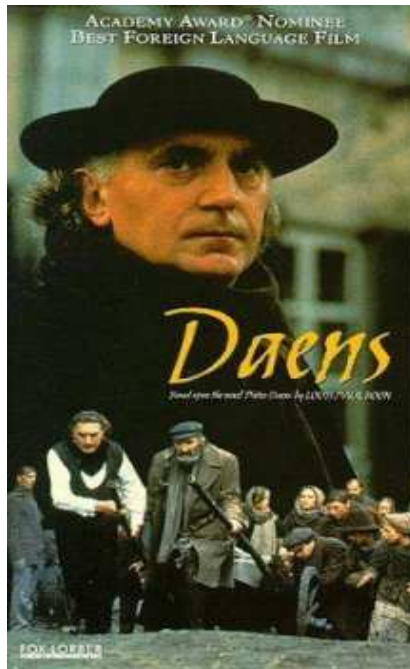


## The beginning...?





# Globalisation



=



- 130 years  
+ 10.000 km

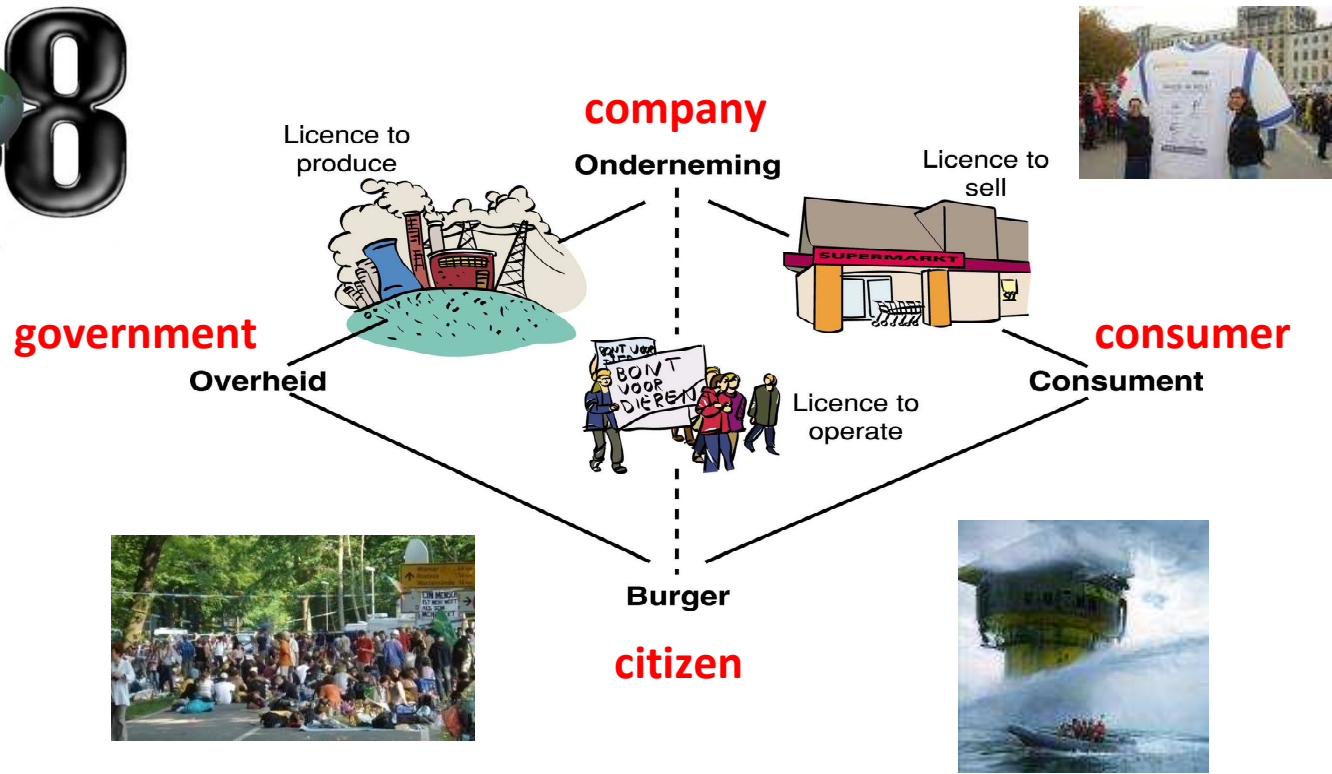


# Technological developments



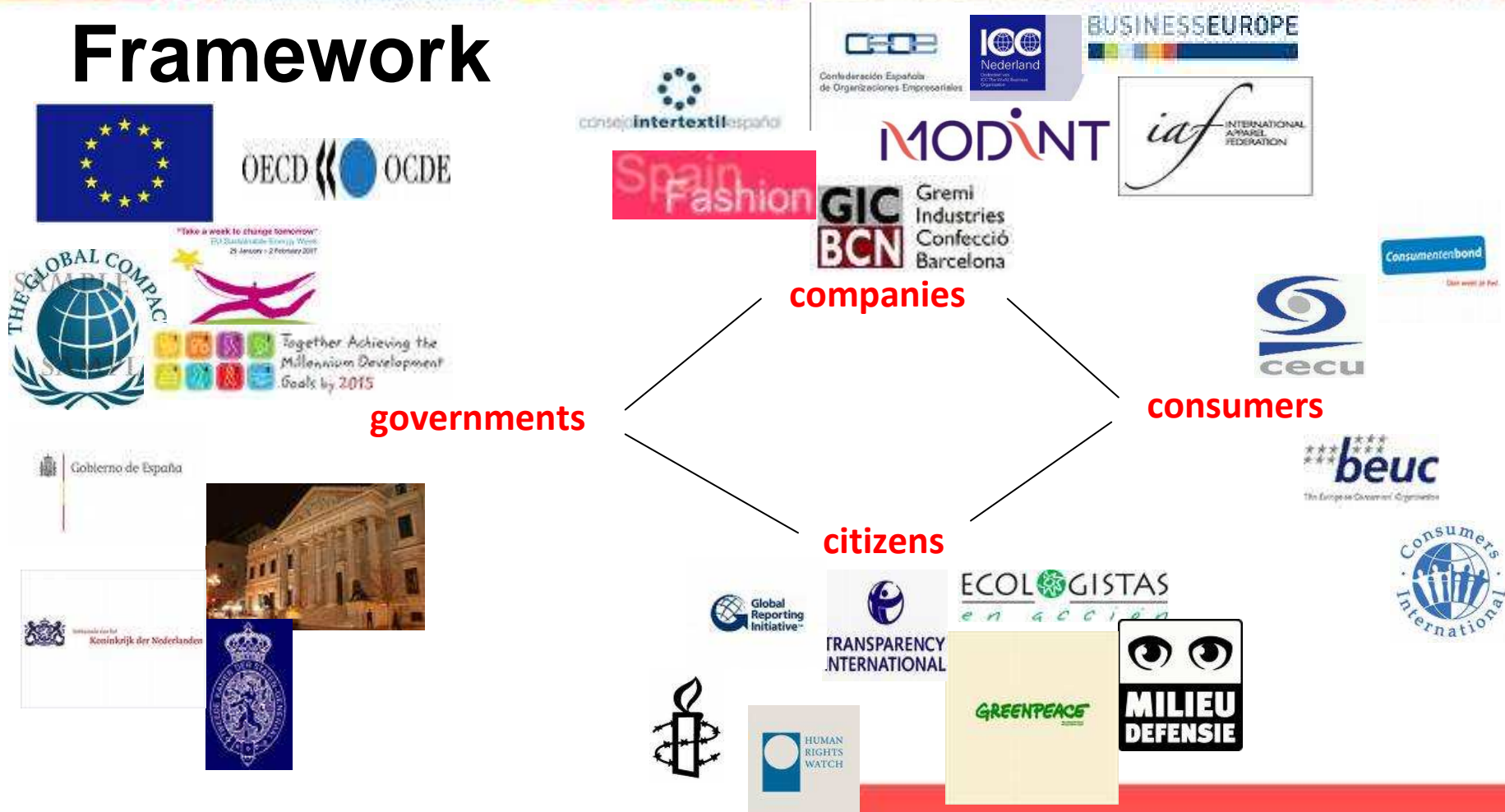


# License to operate



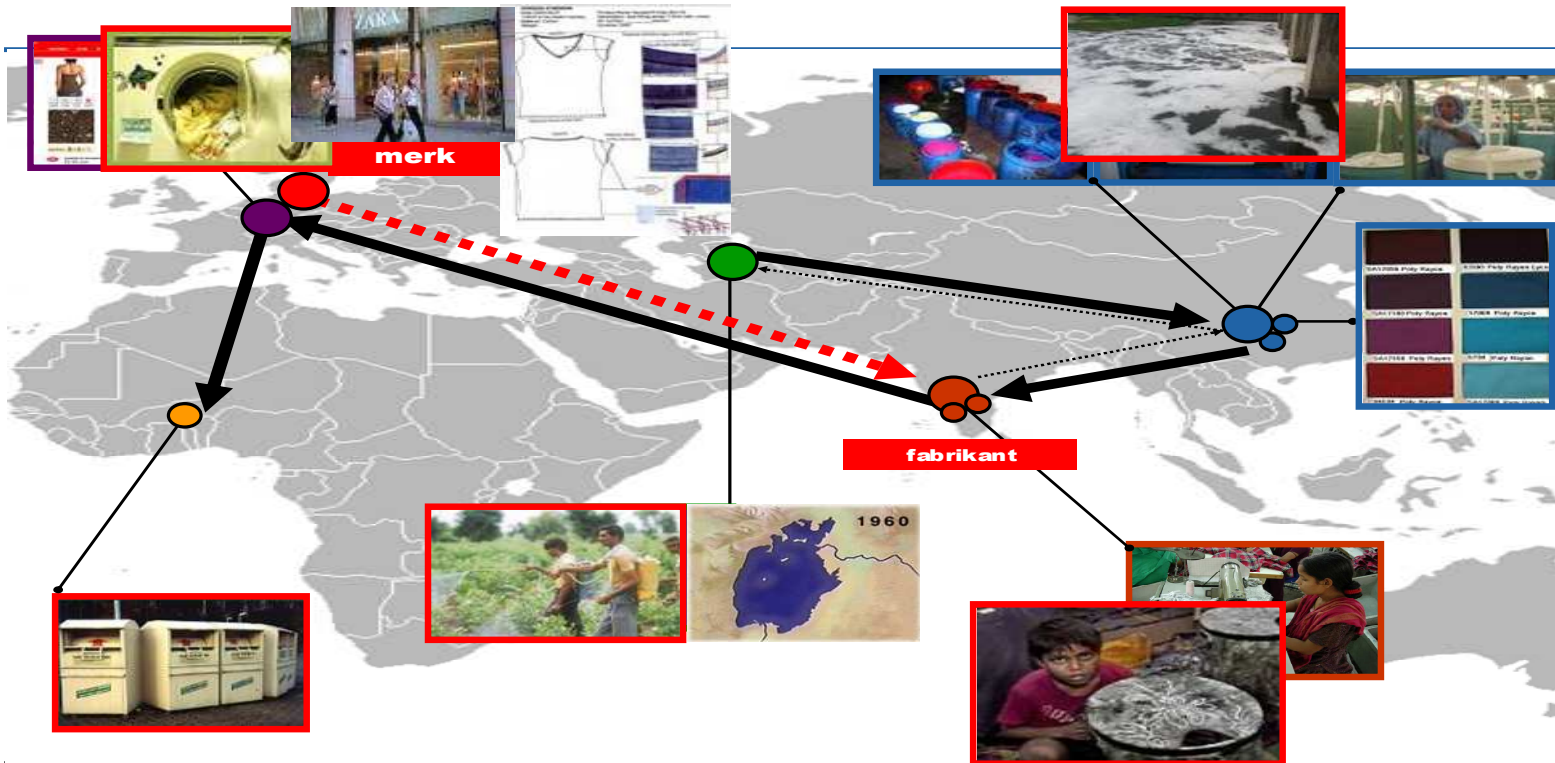


## Framework





# Where to start CSRS?





# How to judge CSRS performance?

**ISO 25000**

**ISO 14001**

**ISO 9001**

**MADE-BY**

**ECO Sustainable textile**

**SOIL ASSOCIATION ORGANIC STANDARD**

**CONFIDENCE IN TEXTILES 100 plus**  
Tested for harmful substances according to Oeko-Tex Standard 100 + Oeko-Tex Standard 1000  
STEX, Zürich

**Use / care & maintenance recycling**

**ISO**

**Cotton**

**Textile chain**

**Clothing chain**

**Use / care & maintenance recycling**

**NATURTEXTIL**

**BCI**

**GUT**

**FAIR LABOR ASSOCIATION**

**FAIR WEAR**

**Naturland**

**FAIRTRADE**

**BSCI**

**SAI SOCIAL ACCOUNTABILITY INTERNATIONAL SA 8000**

**WRAP WORLDWIDE RESPONSIBLE APPAREL PRODUCTION**

**ethical trading initiative**

**MADE-BY**

**KICI**

**Leger des Heils**

**WERTUNG**

**ARBEIT SCHAFFEN UMWELT SCHONEN**

**ORGANIC EXCHANGE**

**International Rayon and Synthetic Fibres Consortium**

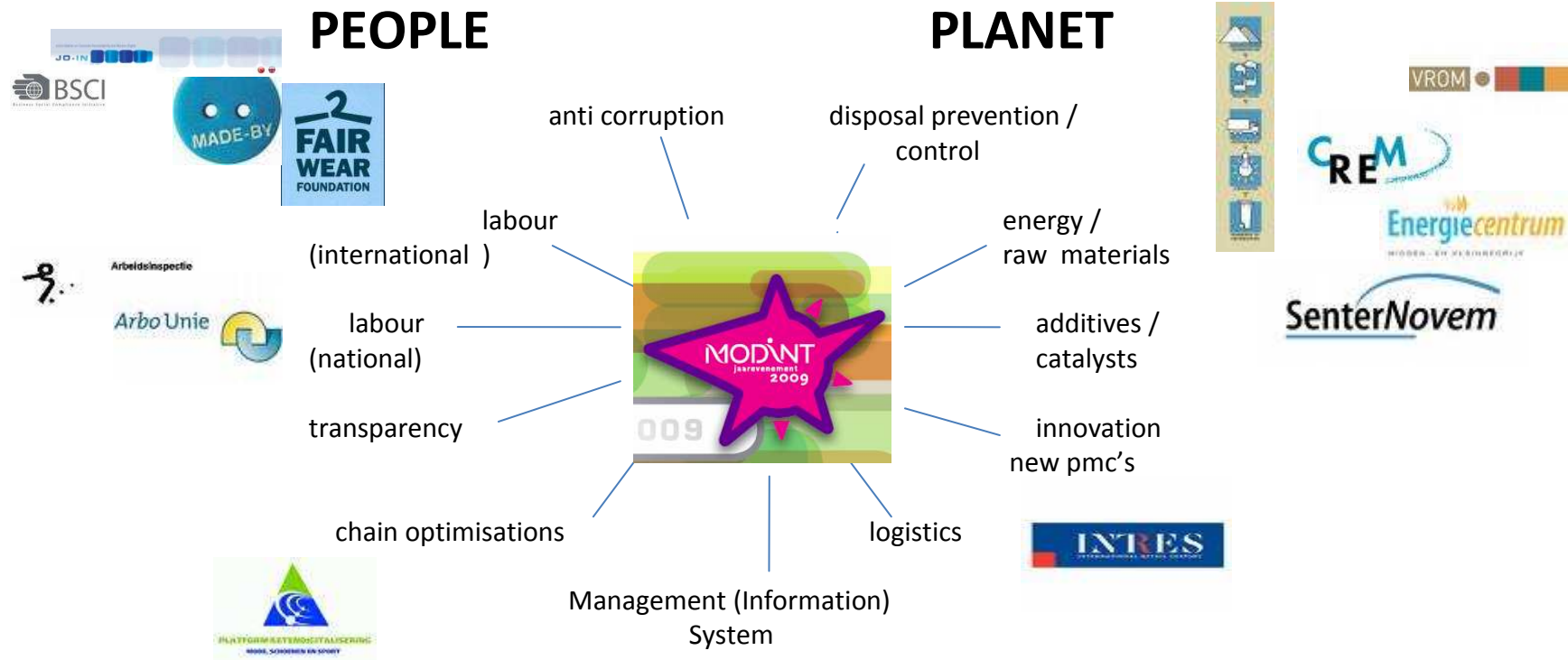
**CIRPS**





## MODINT Policy line

- Continuity of company activities
- No contribution to a “paper world reality”, but real and practical work
- Responsibility in chain: yes – but not accountable for everything in chain
- Increasing sustainability is a process, **so direction more important than level of entry**
- Final judgement is to society, so strong preference for Multi Stakeholder Initiatives



*FWF: “multi-stakeholder” initiative for improving labour circumstances in confection industries*





## Code Classification (source Made By)

- A ETI, SA8000, FWF + low risk countries (highest)
- B FLA, BSCI B
- C WRAP C
- D Unclassified D (lowest)

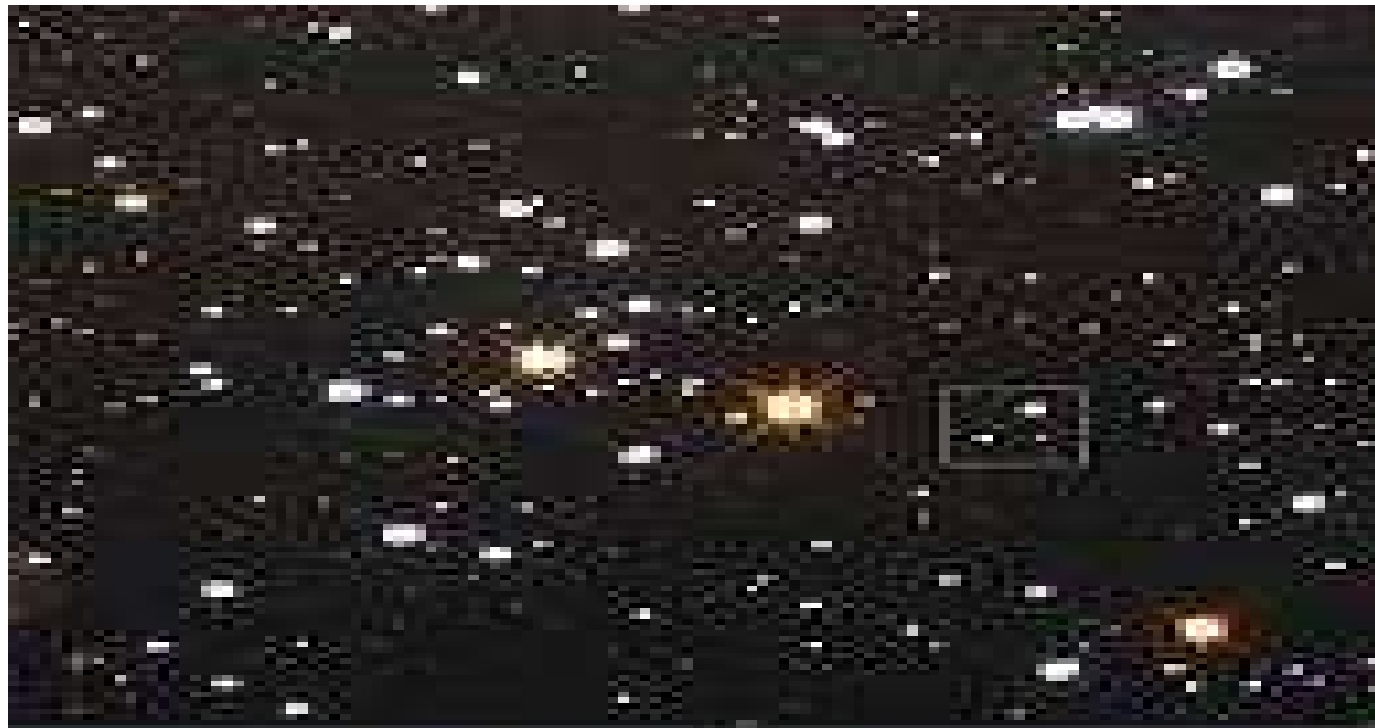


# MSI Environment ?

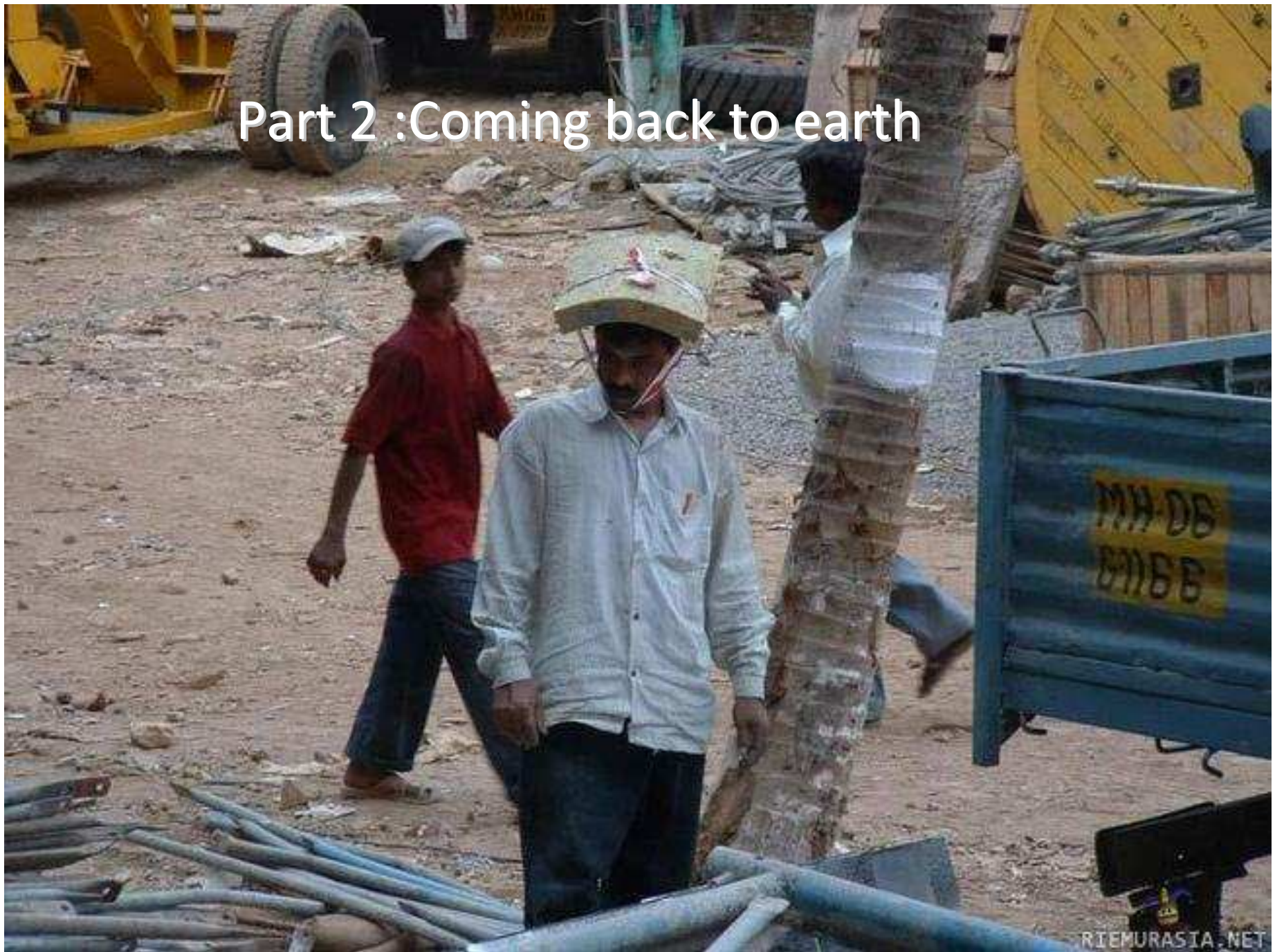




Next steps...?



## Part 2 :Coming back to earth





This is not the way to handle this ...





# EU legislation

## Legislation

- A EUROPEAN LEGISLATION (REACH)
- B NATIONAL LAWS (FIRE SAFETY in NL)
- C VOLUNTARY AGREEMENTS (Detachable Hoods)
- D STANDARDISATION (EN



## EU Legislation: REACH

- Intended release?
- Art 33, “right to know for consumers”
- SVHC = Substances of Very High Concern op de Candidate list
- Authorisatie (Annex XIV)
- Annex XVII: verschillende chemicals op een rij, zie ook MODINT RSL
- Guidance on requirement for substances in articles



# Annex XVII: Forbidden arylamines in

## Azo dyes

1. Biphenyl-4-ylamin, 4-aminobiphenyl, xenylamine
2. Benzidine
3. 4-chloro-o-toluidine
4. 2-naphtylamine
5. o-aminoazotoluene, 4-amino-2',3'-dimethylazobenzene, 4-o-tolylazo-otoluidine
6. 5-nitro-o-toluidine
7. 4-chloroaniline
8. 4-methoxy-m-phenylenediamine
9. 4,4'-methylenedianiline, 4,4'-diaminodiphenylmethane
10. 3,3'-dichlorobenzidine, 3,3'-dichlorobiphenyl, 4'-ylenediamine
11. 3,3-dimethoxybenzidine
12. 3,3-dimethylbenzidine, 4,4'-bi-o-toluidine
13. 4,4'-methylenedi-o-toluidine
14. 6-methoxy-m-toluidine, p-cresidine
15. 4,4'-metylene-bis-(2-chloro-aniline) 2,2'-dichloro-4,4'- methylenedianiline
16. 4,4'-oxydianiline
17. 4,4'-thiodianiline
18. o-toluidine, 2-aminotoluene
19. 4-methyl-m-phenylenediamine
20. 2,4,5-trimethylaniline
21. o-anisidine (2-methoxyanilin)
22. 2,4-xylidine
23. 2,6-xylidine
24. 4-amino azobenzene



## RAPEX information on recall



- The product poses a chemical risk because it contains 30mg/kg of benzidine, which is a known human carcinogen which can easily be absorbed through the skin. This product does not comply with the Chemical Restrictions Directive 76/769/EEC.

## Übersicht der „Vor-Kandidatenstoffe“

1

Stand: 14.08.08



Gem. ECHA-LISTE, mit Hinweisen auf mögl. Verwendungen in Konsumprodukten  
Bei diesem Dokument handelt es sich um eine Orientierungshilfe - Kein Anspruch auf Vollständigkeit!

Stoff mit EC, CAS-NR	Klassifizierung <a href="http://ecb.jrc.it/esis/">http://ecb.jrc.it/esis/</a>	Anwendungsgebiete	Weitere Informationen Hyperlinks
-------------------------	--	-------------------	-------------------------------------

### I. 3 PHTHALATE

<b>Dibutyl Phthalate (DBP)</b>  EC 201-557-4 CAS 84-74-2	Repr. Cat. 2; R61 - Repr. Cat. 3; R62 - N; R50	<ul style="list-style-type: none"> <li>• Weichmacher in PVC-Produkten</li> <li>• DIY: Dichtungsmittel / Fugenmasse, Nitrocellulosefarbe, Glasfaser</li> <li>• Schreibwaren: Druckerfarbe, Kleber</li> <li>• Körperpflege: Parfümlösemittel und -fixiermittel, Hautweichmacher, Nagellackentferner</li> <li>• Weitere: Schmiermittel für Aerosolventile; Aufschwemmungsmittel für Feststoffe in Aerosolen; Antischäumendes Mittel</li> </ul>	<ul style="list-style-type: none"> <li>▪ <a href="#">Dossier</a> S. 20-30</li> <li>▪ Wikipedia</li> <li>▪ Generell zu Phthalaten: UBA-Broschüre</li> <li>▪ Konsumprodukte mit PVC: AGPU</li> </ul>
<b>Benzyl Butyl Phthalate (BBP)</b>  EC 201-822-7 CAS 85-88-7	Repr. Cat. 2; R61 - Repr. Cat. 3; R62 - N; R50-53	<ul style="list-style-type: none"> <li>• Weichmacher in PVC-Produkten</li> <li>• DIY: Bodenbeläge, Dichtungsmittel, Farben, Lacke</li> <li>• Schreibwaren: Kleber</li> <li>• Körperpflege: Kosmetika</li> <li>• Spielwaren: Als Fremdstoff in Kinderspielzeug</li> <li>• Lebensmittel: Lebensmittelverpackungen</li> </ul>	<ul style="list-style-type: none"> <li>▪ <a href="#">Dossier</a> S. 22-36</li> <li>▪ Wikipedia</li> <li>▪ Generell zu Phthalaten: UBA-Broschüre</li> <li>▪ Konsumprodukte mit PVC: AGPU</li> </ul>
<b>Bis(2-ethylhexyl)phthalate (DEHP)</b>  EC 204-211-0 CAS 117-81-7	Repr. Cat. 2; R60-61	<ul style="list-style-type: none"> <li>• Weichmacher in PVC-Produkten</li> <li>• DIY: Tapeten, Bodenbeläge, Dichtungsmittel, Dämmstoff, Duschvorhänge</li> <li>• Elektro: Kabelisolation</li> <li>• Möbel: Einrichtungsgegenstände</li> <li>• Textilien: Kunstleder, Regenbekleidung, Schuhwerk, Textilfarben</li> <li>• Spielwaren: Babyprodukte</li> <li>• Lebensmittel: Lebensmittelbedarfsgegenstände</li> <li>• Weitere: Autoausstattung</li> </ul>	<ul style="list-style-type: none"> <li>▪ <a href="#">Dossier</a> S. 38-40</li> <li>▪ Wikipedia</li> <li>▪ Generell zu Phthalaten: UBA-Broschüre</li> <li>▪ Konsumprodukte mit PVC: AGPU</li> </ul>

### II. 1 PAK (Polyzyklischer aromatischer Kohlenwasserstoff)

<b>Anthracene</b> <b>D: Anthracen</b>  EC 204-371-1 CAS 120-12-7	not classified in the Annex I of Directive 87/548/EEC	<ul style="list-style-type: none"> <li>• Pyrotechnik</li> <li>• Schreibwaren: Farbstoffe</li> <li>• DIY: Schädlingsbekämpfungsmittel, Farbstoffe</li> <li>• Textil: Gerbstoffe (Leder), In Aloe vera-Pflanze enthalten</li> </ul>	<ul style="list-style-type: none"> <li>▪ <a href="#">Dossier</a> S. 19-22</li> <li>▪  <ul style="list-style-type: none"> <li>▪ Wikipedia PAK</li> </ul> </li> </ul>
---	---	---	---

## REACH SIN\* List 1.0 (\*Substitute It Now)

Equivalent level of concern				
	CAS#	EC#	Name	Reason for inclusion
1	95-50-1	202-425-9	1,2-dichlorobenzene	Equivalent level of concern
2	98-54-4	202-679-0	4-tert-butylphenol	Equivalent level of concern
3	9002-93-1; 9036-19-5; 68987-90-6		4-tert-octylphenoethoxylate	Equivalent level of concern
4	62-53-3	200-539-3	Aniline	Equivalent level of concern
5	1309-64-4	215-175-0	Antimony trioxide	Equivalent level of concern
6	119-61-9	204-337-6	Benzophenone	Equivalent level of concern
7	80-05-7	201-245-8	Bisphenol A	Equivalent level of concern
8	1163-19-5	214-604-9	Deca-brominated diphenyl ether (Deca-BDE)	Equivalent level of concern
9	1002-53-5; 77-58-7		Dibutyl tin	Equivalent level of concern
10	28553-12-0; 68515-48-0	249-079-5	Di-"isononyl" phthalate (DINP)	Equivalent level of concern
11	50-00-0	200-001-8	Formaldehyde	Equivalent level of concern
12	1222-05-5	214-946-9	Galaxolide	Equivalent level of concern
13	110-54-3	203-777-6	Hexane	Equivalent level of concern
14	91-20-3	202-049-5	Naphthalene	Equivalent level of concern
15	25154-52-3; 104-40-5; 90481-04-2	246-672-0	Nonylphenol	Equivalent level of concern
16	9016-45-9; 26027-38-3; 68412-54-4;	500-024-6	Nonylphenol etoxilate	Equivalent level of concern



## Tools to implement REACH

- MODINT RSL recommendations editie 2011
- AFIRM Toolkit, version september 2011
- AAFA RSL , version 9 , september 2011
- AAFA versus MODINT RSL, the differences
- MODINT cooperation with GERMAN FASHION



## MODINT RSL recommendations

- Update twice a year
- Including Reach and DMF and other chemical legislation
- Coordinated with AAFA (American Apparel and Footwear Association)
- Cooperation with German Fashion
- Including flow charts with test packages



A horizontal banner with a collage of textile images including colorful fabrics, a knitted sweater, and spools of thread. The text "MODiNT RSL Recommendations" is overlaid in black.



## Apparel & Footwear International RSL Management Working Group

"To reduce the use and impact  
of harmful substances in the apparel  
and footwear supply chain."

- [ 2008 AFIRM RSL Seminar in New Delhi, India ]
- [ Previous RSL Seminars ]
- [ FAQ ]
- [ RSL Seminar Agenda ]
- [ Supplier RSL Implementation Toolkit ]
- [ REACH Information for Suppliers ]
- [ Objectives ]
- [ Companies ]



### Companies

For information on legislated restricted substances, please go to [www.apparelandfootwear.org](http://www.apparelandfootwear.org). For specific information on substances restricted by individual AFIRM companies, limits and test methods, please go to the brand's website:

- [Ann Taylor](#)
- [adidas-Group](#)
- [C&A](#)
- [Gap, Inc.](#)
- [H&M](#)
- [Levi Strauss & Co.](#)
- [Marks & Spencer](#)
- [New Balance](#)
- [Nike](#)
- [Nordstrom](#)
- [PUMA](#)
- [REI](#)
- [s. Oliver](#)
- [TESCO](#)

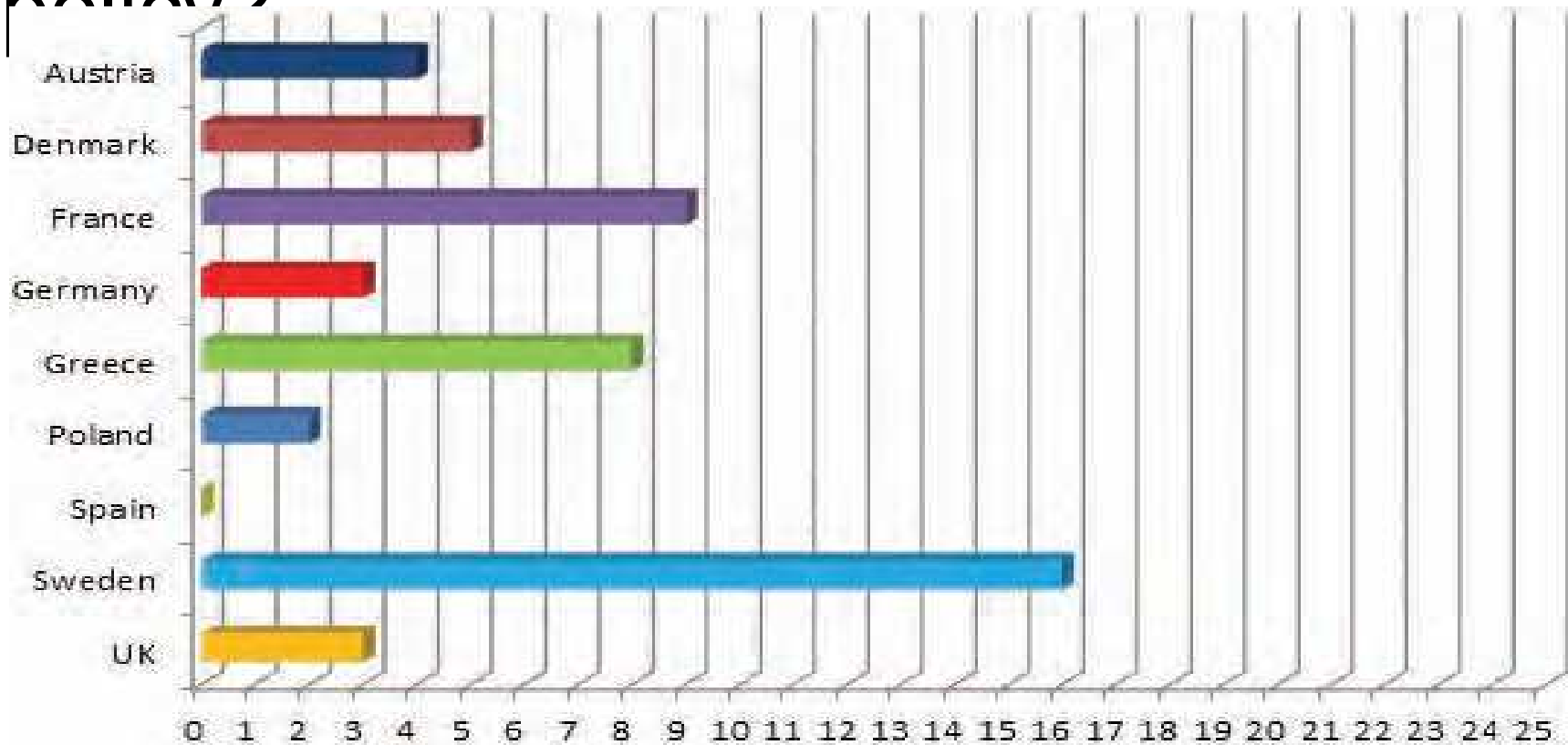


## OVERVIEW INITIATIVES AND PARTICIPATING COMPANIES

<b>GAFTI</b>	Hong Kong	VF, Adidas, Guess, Ann Taylor, TAL, Otto Versand, Alvanon, Lectra, MTS (Not an full list!)	Global Apparel, Footwear and Textile Initiative is an initiative to bring retailers, brands, mills and factories together to improve efficiencies and set standards globally. GAFTI's goal is to reduce complexity and remove costs from common industry practices and prevent increased scrutiny from press and governments, which could lead to increased regulation.
<b>SAC</b>	San Francisco	Adidas, Arvind Mills, ASICS, C&A, Columbia Sportswear, Duke Center for Sustainability and Commerce, DyStar, Environmental Defense Fund, Esprit, Esquel, Gap Inc., H&M, HanesBrands, Huntsman, INDITEX, Intradeco, JC Penney, Kohl's Department Stores, Lenzing, Levi Strauss & Co., LF USA, a division of Li & Fung Limited, L.L.Bean, Inc., Makalot Industrial Company, Marks & Spencer, MAS Active, Mountain Equipment Co-op, New Balance, Nike, Nordstrom, Otto Group, Outdoor Industry Association, Patagonia, Pentland Brands, Pratibha Syntex Limited, PUMA, REI, TAL Apparel, Target, Teijin Fibers Limited, Timberland, Tiong Liong Corporation, USA DuPont, U.S. Environmental Protection Agency, Verité, VF Corp, Walmart, WL Gore & Associates, and WRI.	Through multi-stakeholder engagement, the Coalition seeks to build a common approach for measuring and evaluating apparel and footwear sustainability impacts and performance that will spotlight priorities for action and opportunities for technological innovation
<b>AFIRM</b>	Los Angeles	Adidas, C&A, Gap, H&M, Hugo Boss, Levi Strauss,, New Balance, Nike, Pentland, Puma, S.Oliver, Warnaco, VF	AFIRM is a recognized global center of excellence, providing resources for sustainable, self-governing RSL implementation across the apparel and footwear supply chain.
<b>Joint Roadmap</b>	??	C&A, Nike, Adidas, H&M, li Ning, Puma	Zero discharge 2020



# Companies who mention a Chemical policy?





## GREENPEACE ACTION on Wet processing !

- GREENPEACE report & roadmap 2020: goal of zero discharge of chemicals in the supply chain,
- Adidas, C&A, H&M, Li Ning, Nike en Puma,
- Voorstel Zweden en Frankrijk tot studie door EC op 11/10/11
- Deadline studie over endocrine disruptor chemicals (waaronder NPE) is 31/12/11



## Raw material Classification (source Made By)

- Class 1 (highest) Recycled cotton, recycled Nylon6, recycled Polyester, organic hemp, organic flax (linen)
- Class 2 Tencel® (a lyocell product), organic cotton
- Class 3 conventional hemp, ramie, PLA, conventional flax (linen)
- Class 4 virgin Polyester, Poly-acrylic, rayon viscose
- Class 5 (lowest)conventional cotton, virgin Nylon6, rayon, bamboo viscose, wool, generic rayon
- Unclassified Materials that are not (yet) included in the benchmark



# EU legislation. General product safety directive



## Consumer Affairs

Important legal notice

English

EUROPA > European Commission > DG Health and Consumers > Consumer Affairs > Consumer Safety: Products and Services > Unsafe products

Contact | AZ-Index | Search | What's New? | Subscribe | Site map | Home

Strategy and programmes Safety Rights Enforcement Redress Consumer empowerment

printable version



### RAPEX - Latest notifications

RAPEX is the EU rapid alert system for all dangerous consumer products, with the exception of food, pharmaceutical and medical devices. It allows for the rapid exchange of information between Member States via central contact points (the **National Contact Points** ) and the Commission of measures taken to prevent or restrict the marketing or use of products posing a serious risk to the health and safety of consumers. Both measures ordered by national authorities and measures taken voluntarily by producers and distributors are covered by RAPEX.

Every Friday, the Commission publishes a weekly overview of the dangerous products reported by the national authorities (the RAPEX notifications). This weekly overview gives you all information on the product, the possible danger and the measures that were taken by the reporting country. ([Disclaimer](#))

Have a look at [last week's notifications](#) (published on 26-06-2009)

Besides, you can use the search tool by typing one or more key words (e.g. toy,chemical) and then the system will display all notifications containing these words.

Limit search:



2009

- [Week 24](#) (published on 26-06-2009)
- [Week 23](#) (published on 19-06-2009)
- [Week 22](#) (published on 12-06-2009)
- [Week 21](#) (published on 05-06-2009)
- [Week 20](#) (published on 29-05-2009)
- [Week 19](#) (published on 22-05-2009)
- [Week 18](#) (published on 15-05-2009)
- [Week 17](#) (published on 08-05-2009)
- [Week 16](#) (published on 01-05-2009)
- [Week 15](#) (published on 24-04-2009)
- [Week 14](#) (published on 17-04-2009)

#### Media

- [Speeches](#)
- [Press releases](#)
- [Events](#)
- [Campaigns](#)
- [Publications](#)

#### Key Documents

- [Consultations](#)
- [Reports](#)
- [Eurobarometers](#)

#### Quick Links

- [ECC-Net](#)
- [Latest product warnings \(RAPEX\)](#)
- [National consumer organisations](#)
- [Tenders and grants](#)





## EN 14682

Safety of children's clothing – Cords and drawstrings on children's clothing – Specifications







## CEN/TC248/WG 32 on Eco labelling: Green washing?

- Meetings as of 2008
- Mission : to define ecological, organic, biological and natural textile products
- Last meeting february 2012



## Dutch Experience with Bulgaria

- MODINT collects experiences of practice
- 26 companies in our database (brands and private label): Claudia Strater, Turnover, Ethics, Anky, etc
- Quotes: “reliable, good quality, nearby”
- Shift to smaller series



**gsus**  
sindustries

Exportador:  
gsus Wholesale & Design bv  
Johan van Hasseltweg 27  
1021 KN Amsterdam Holanda  
VAT no: NL805 593 020 B01  
www.g-sus.com  
gsus@gsus.nl

GSUS 2001 S.L.  
Pellonga Errotatxu 6-C  
48990 GETXO España  
VATno: B-95153953

חברת: אנדר טקס בע"מ  
ENDER TEX LTD  
ר"ח תל ניבתיים 5 ת"א  
ט"ו ארזיבב כ"ו

Importador; Importadora  
Work Fashion SA de CV  
RFC: IWF031003J18  
La Posada 4193-B Cof. La Giralda  
Zapopan, Jal. Mx CP45088

USA: RN 107400  
Canada: CA 854452133  
CA. 43055

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by G-Hold Licence B.V.

Bodymaterial/Composicion:  
92% Cotton-Baumwolle-Coton  
Cotone-Algodon-Algodao  
8% Elastan-Elasthanne  
Elasthan-Elastano

Washing instructions  
Instrucciones de lavado

Machine Wash 30° C  
Wash inside out  
Ironing: inside out max 110° C  
No bleaching  
No tumble dry  
Hang to dry  
Dry cleaning: perchloroethylene



Made in: Turkey  
Pais de Origen: Turquia

Supplier nr: 944838  
Style nr: B03006  
Purchase Order nr: POR035228

Cotton	92%	כותנה
Polyester	0%	פוליאסטר
Wool	0%	צמר
Other	8%	הרכב אחר

Sizes/Talla:	L=G
XS=EXCH	XL=EXG
S=CH	XXL=EXEXG
M=M	



## Top 4 “fouten” uit de modint benchmark

- Vezel-samenstelling niet in alle talen van exportlanden
- Care symbols : verkeerde volgorde en bleeksymbool
- Onjuist gebruik beschermde brandnames(bv. lycra)
- Ontbreken BTW-nummer bij export naar Spanje

The logo for MODiNT features the word in a bold, sans-serif font. The letters 'M', 'O', 'D', 'N', and 'T' are dark purple. The letter 'i' is stylized with a red-to-orange gradient swoosh that curves under the 'D' and 'N', and a solid dark purple dot above it.

MODiNT

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