



POLICY ON CHEMICALS

Policy

It is an ASDA policy that all our non-food products comply with the requirements of the ASDA chemicals policy and inclusion of chemicals above the specified limit is not permitted. This policy applies to all parts of the product, including all internal components and packaging.

Background

Although established as one of the UK's largest food retailers, an increasing proportion of ASDA's business is dedicated to providing customers with a significant range of non-food products. ASDA has a responsibility for ensuring that all products are safe for use.

In addition to the many safety standards that ASDA's products must meet (both legally and as part of ASDA's technical policies that go beyond legal requirements), as a business we recognise that our products must meet strict chemical standards that will ensure the safety of our customers and protect the environment in which our products are used.

Implementation

All suppliers must ensure that products supplied to ASDA are free from the chemicals listed in this document. A large portion of the chemicals listed are currently controlled through various pieces of EU legislation, and summaries of these are provided below:

- REACH (1907/2006/EC): This regulation requires importers and manufacturers of chemicals and finished products to provide detailed chemical information to the European Chemicals Agency, but only if certain criteria have been met. In addition, following publication of the 'candidate list', any listed chemicals used in consumer products will require further information and possibly legal approval before use can continue. Ensuring compliance with this regulation will possibly require a supplier having a much more detailed understanding of the chemicals used to manufacture their products. Failure to comply with the regulation can result in products being withdrawn from sale. More information can be found in the ASDA REACH policy (hosted upon the ASDA supplier website) and via <http://echa.europa.eu/>.
- ANNEX XVII of REACH (1907/2006/EC): Formerly known as the Marketing and Use Directive or Limitations Directive (76/769/EEC), the contents of which have been transposed into Annex XVII of REACH. This goes beyond the scope of the Dangerous Substances Directive and the Dangerous Preparations Directive by placing restrictions upon the use of many chemicals deemed to be of high concern. Placing a product on the market which is in breach of these restrictions is illegal.
- Cosmetics Directive (76/768/EEC): This directive was implemented as a mechanism to ensure the safety of all cosmetic products placed on the market within the EU. Since its first publication, the directive has been amended 7 times and adapted to technical progress over 30 times which further provide higher levels of consumer protection. All cosmetic products sold within ASDA much comply with this directive.
- RoHS (2002/95/EC): This directive took effect on 1st July 2006 and in doing so placed restrictions on the use of 6 chemicals (lead, cadmium, mercury, chromium VI, PBB and PBDE's) within electrical and electronic equipment. Since entering into force, the use of decaBDE has also been removed from the exemptions list and products captured by the directive must also be free of this substance. Suppliers must complete a declaration of conformity, and to further ensure compliance ASDA undertakes a program of surveillance testing to monitor conformity.

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- Phthalates Directive (2005/84/EC): Although this formed part of the old Limitations Directive (via its 22nd Amendment), the requirements imposed upon the sale of children's toys and childcare articles deserves special mention. In this case, 6 phthalates are restricted for use in these items and products captured by this legislation must not be sold on the EU market.
- UK Detergent Regulations 2005 (Implementing 648/2004/EC): This legislation places additional requirements on products which classified as detergents. Under the Regulation products that contain soaps or surfactants, in addition to numerous other products that are classed as detergents (such as fabric softeners and 'other cleaning preparations'), must meet more stringent performance and labelling criteria.
- Azo colorants Directive (2002/61/EC): Again, this forms part of the Limitations Directive (via its 19th Amendment), but its requirements do have significant impact upon the product ranges sold by ASDA, namely textile based products that are sold in large volumes.
- Food contact directive (1935/2004/EC): This is the core piece of legislation that controls the use of food contact materials. All products that are sold by ASDA and are designed to come into contact with food must comply to the requirements outlined in this directive.
- Food contact plastics (2002/72/EC): This directive, which has been amended 5 times since entering into force, set guidelines and limits for plastic materials and articles which are designed to come into contact with food. It lists permitted monomers and approved additives, and also sets both overall and specific migration limits of the listed additives.

Enforcement

All products are tested for legal compliance during the product appraisal process. To further ensure that products comply with the ASDA chemicals policy there is an ongoing process of surveillance testing.

Silica Gel (desiccant)

In order to protect products from the effects of excess moisture during transit, there are some instances when sachets of silica gel are added to the packaging.

Silica gel must only be used:

- if it is technically vital for protecting products during transit
- after prior approval by the ASDA development technologist
- with submission of a test report (from an accredited laboratory) to prove that the silica gel is free from DMF (dimethyl fumarate)

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The following table highlights key substances that are currently restricted by ASDA and authorities within the EU. This list is not exhaustive, and all products must comply with chemical requirements outlined in the EU policies already mentioned in this document.

Chemical name / family	Uses	Applicable products ranges and specific requirements	Limit	EU legislation controlling use
Alkyl tins (organostannic compounds), including: Tri-substituted compounds (tributyltin (TBT) and triphenyltin (TPT)) (further restrictions will be placed up di-substituted compounds at a later date)	TBT was historically used as a biocidal active in anti-fouling paint.	Products based on PVC (fabrics with PVC print, guttering and profiles), paints and coatings, vulcanisation sealants, footwear, feminine hygiene products and nappies.	<0.1% (TBT and TPT)	2002/62/EC: 9 th amendment to the limitations directive (76/769/EEC); now captured under 1907/2006/EC Annex XVII
	Other organostannic compounds are used in a wide variety of applications, commonly found in consumer products as stabilisers used in some plastics (found in some products and packaging), or as catalysts.			2009/425/EC: Amendment of 76/769/EEC; now captured under 1907/2006/EC Annex XVII
	A wide variety of alkyl tin compounds are permitted for use in food packaging.	Food packaging	Use in food contact materials must be in accordance with EU food contact regulations.	2002/72/EC Plastic materials and articles intended to come into contact with food stuff.
Alkyl phenols (including ethoxylated phenols): Nonylphenol and nonylphenol ethoxylate Octylphenol and octylphenol ethoxylate	Potentially used in a variety of industries: <ul style="list-style-type: none"> • Formulation of cleaning products • Plant protection products • Cosmetic formulations • Leather and textile processing 	All cleaning products and cosmetics must be free of alkyl phenols.	<0.1%	2003/53/EC: 26 th amendment to the limitations directive (76/769/EEC); now captured under 1907/2006/EC Annex XVII
Azo dyes (see Annex I for listing of banned amines)	Textile colorants	All textile and leather based products, including accessories (such as lanyards and straps).	<30ppm	2002/61/EC Azo colorants directive Controls on certain Azodyes and 'Blue Colourant' 2003/3/EC

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2,2-bis(hydroxyphenyl)propane (Bisphenol A)	Predominantly used in the production of polycarbonate, epoxy resins and the flame retardant TBBPA	Polycarbonate is used in feeding bottles. Policy is to eliminate bisphenol A from items likely to be mouthed by infants.	<0.03µg/ml	BS EN 14350-2: Child use and care articles - Drinking equipment - Part 2: Chemical requirements and tests
		Plastic materials coming into contact with food	<0.6 mg/kg	2004/19/EC: Amendment to 2002/72/EC
Brominated flame retardants:- Pentabrominated diphenyl ether Octabrominated diphenyl ether Decabrominated diphenyl ether	Used as flame retardants in plastics and textiles	Applies to all products and parts therefore that use plastics and textiles	<0.1% w/w	2002/95/EC: RoHS 2003/11/EC: 24 th Amendment to the limitations directive (76/769/EEC); now captured under 1907/2006/EC Annex XVII
Tris (2,3-dibromopropyl) phosphate (TRIS)	Textile flame retardant	Textiles which are flame retarded	0%	79/663/EEC (1 st amendment to the limitations directive 76/769/EEC); now captured under 1907/2006/EC Annex XVII
Bis (2,3-dibromopropyl) phosphate	Textile flame retardant	Textiles which are flame retarded	0%	ASDA Specific restriction
Tris (1-aziridinyl)-phosphine oxide (TEPA)	Textile flame retardant	Textiles which are flame retarded	0%	83/264/EEC (4 th amendment to the limitations directive 76/769/EEC); now captured under 1907/2006/EC Annex XVII
1,4-Dioxane	This compound is a by-product of a process used to produce some cosmetic ingredients.	This applies to those cosmetics that may contain ethoxylated ingredients.	<0.1%	76/768/EEC Cosmetics Directive

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Formaldehyde		Textile nursery items and plush toys up to the age of 2 years.	<20ppm	Free and Hydrolysed formaldehyde BS EN 14184-1:1999
		Baby bedding (up to age of 2 years)	<20ppm	Released formaldehyde BS EN 14184-2:1998. Vapour absorption method
		Direct skin contact* textiles all ages over the age of 2, including bedding, towels, dress up costumes	<75ppm	Free and Hydrolysed formaldehyde BS EN 14184-1:1999
		Non direct skin contact* products all ages over the age of 2, including curtains, storage boxes, pencil cases and kitchen textiles	<300ppm	Free and Hydrolysed formaldehyde BS EN 14184-1:1999
		All decorative textile items, including seasonal products.	<300ppm	Free and Hydrolysed formaldehyde BS EN 14184-1:1999
		Wooden toys, nursery furniture and childcare articles manufactured using resin bonded wood.	<80ppm	BS EN717-3:1996
		Paper products – children under 36 months	<30mg/kg	EN71-9, tested per EN645 and EN1541
		Food contact paper items	< 1mg/dm ²	Council of Europe Policy statement for tissue paper kitchen towel and napkins

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Disperse Dyes	Primarily used in the dyeing of polyester fabrics.	Disperse Yellow 1, 3, 9, 39, 49	0%	ASDA specific restriction in accordance with Oeko-Tex 100 standard
		Disperse Orange 1, 3, 76/37		
		Disperse Brown 1		
		Disperse Red 1, 11, 17		
		Disperse Blue 1, 3, 7, 26, 35, 102, 106, 124		
Carcinogenic Dyes	Primarily used to dye fabrics, both natural and synthetic	Acid Red 26 Basic Red 9 Direct Black 38 Direct Blue 6 Direct Red 28 Direct Blue 1 Disperse Yellow 3 Basic Violet 14 Disperse Orange 11	0%	The dyes listed in this section are classified as carcinogenic under the Dangerous Substances Directive (67/548/EEC)
CCA wood treatments (copper-chrome-arsenic)	Used as a biocide in wood treatment formulations to prolong the life of timber used outdoors.	Applies to all products outdoor ranges that use wood/timber within their construction	0%	Restrictions on public use of formulations containing these substances are in place via 2006/139/EC (amendment to 76/769/EEC); now captured under 1907/2006/EC Annex XVII
Methyl Eugenol	Naturally found in some essential oils used in cosmetics. Its intentional use is prohibited in the EU (0%), but due to its natural occurrence strict limits are enforced to ensure consumer safety.	Cosmetics products	0.01% - fine fragrances 0.004% - eau de toilette 0.002% - fragrance cream 0.001% - rinse of products 0.0002% - leave on products and oral hygiene	76/768/EEC Cosmetics directive (amended by 2002/34/EC)

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<p>Phthalates:</p> <p>DEHP (bis(2-ethyhexyl) phthalate) BBP (benzyl butyl phthalate) DBP (dibutyl phthalate)</p> <p>DNOP (di-n-octyl phthalate) DIDP (di-isodecyl phthalate) DINP (di-isononyl phthalate)</p>	<p>Predominantly used as plasticisers in PVC. Also found in adhesives, printing inks, cosmetics, sealants/grouting, paints and film/paper coatings.</p>	<p>Of most concern are products that utilise PVC, but based on the use of phthalates other areas will include packaging materials and cosmetics.</p>		
		DEHP	<0.1% in all products	<p>DEHP, BBP, and DBP are published upon the Candidate List as proposed SVHCs, in accordance with the criteria specified under article 57 of the REACH regulation (1907/2006/EC)</p> <p>2005/84/EC: 22nd Amendment of the limitations directive (76/769/EEC); now captured under 1907/2006/EC Annex XVII</p>
		BBP	<0.1% in all products	
		DBP	<0.1% in all products	
		DNOP	<0.1% in children's toys	<p>2005/84/EC: 22nd Amendment of the limitations directive (76/769/EEC) ; now captured under 1907/2006/EC Annex XVII</p>
		DIDP	<0.1% in children's toys	
		DINP	<0.1% in children's toys	
<p>Pentachlorophenol (PCP) and tetrachlorophenol (TeCP)</p>	<p>Both substances are used as fungicides to prevent mould growth on natural fibres and leather.</p>	<p>Possible use in products that contain textiles and/or leather</p>	<p><0.5ppm</p>	<p>PCP is restricted through 1999/51/EC (24th amendment to 76/769/EEC); now captured under 1907/2006/EC Annex XVII</p> <p>TeCP is restricted by ASDA</p>
<p>Triclosan</p>	<p>This is a common anti-microbial agent added to a variety of formulations and finished products.</p>	<p>Household cleaning products and some homewares (i.e. chopping boards and storage containers)</p>	<p>0%</p>	<p>ASDA specific restriction</p>

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Dimethyl Fumarate (DMF)	Used an anti-fungal agent to reduce mould growth in leather goods.	Areas of known use include leather furniture and leather apparel (i.e. footwear)	0% (use of silica gel must be accompanied by a testing certificate to prove DMF-free status)	Already banned in the EU under Biocides Directive (98/8/EC) for use in biocidal products. 2009/251/EC: Restriction upon places products on the market that contain DMF.
Nickel	Found in many alloys, including stainless steel.	Areas of concern include jewellery, garment accessories,	<0.2 µg/cm ² per week (migration) for objects inserted into the human body <0.5µg/cm ² per week (migration) for objects which are in prolonged contact with the skin	2004/96/EC (40 th amendment of limitations directive 76/769/EEC); now captured under 1907/2006/EC Annex XVII
Cadmium	Historically used in a variety of applications, including the provision of colour and stability to a range of plastics, including PVC, PU, LDPE, epoxy resins, polypropylene, HIPS and cellulose acetate.	Products which utilise any of the listed plastic types, in addition to some paints.	0%	91/338/EEC (14 th amendment to the limitations directive 76/769/EEC); now captured under 1907/2006/EC Annex XVII
Chromium (VI)	Chromium has been used in a numerous applications, but key areas of concern for the retailer sector are for its use as a mordant within the dyeing industry.	Areas of concern include those based upon textiles.	0%	Restrictions on use are in place via the limitations directive (76/769/EEC); now captured under 1907/2006/EC Annex XVII

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4'-tert-butyl-2',6'-dimethyl-3',5'-dinitroacetophenone (musk ketone)	Nitro musk is used in the fragrance industry	Restricted for use in oral care. Limited for use in other products in accordance with the limits specified in the cosmetics directive	1.4% fine fragrance 0.56% eau de toilette 0.042% in other products	2004/88/EC (41 st amendment to the cosmetics directive 76/768/EEC)
Allergenic fragrances	Possible inclusion in fragrance formulations found in cosmetics. Their use is restricted under the cosmetics directive.	Cosmetic and household products	0%	2002/34/EC (34 th amendment to the cosmetics directive 76/768/EEC); now captured under 1907/2006/EC Annex XVII
Substances of Very High Concern – Under EC regulation 1907/2006, these substances have been added to the REACH candidate list. Their use above 0.1% is prohibited in products supplied to ASDA.				
Anthracene	Found in creosote, some dyes formulations and is a contaminant in plasticiser oil or black pigments (soot)		<0.1% w/w	1907/2006/EC REACH
4,4-diaminodiphenylmethane	Used in the production of polyurethane, and as a curing agent in epoxy resin. May also be found in some azo dyes formulations.		<0.1% w/w	1907/2006/EC REACH
Cobalt chloride	This is possibly used in a variety of applications, including: Moisture indicator in silica gel, dye mordant in painted glass, solid lubricant in cutting tools, invisible inks, drying agent in paints, varnishes and inks		<0.1% w/w	1907/2006/EC REACH
Diarsenic pentaoxide	Used in some wood preservatives, agrochemicals, dyes and glass		<0.1% w/w	1907/2006/EC REACH

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Diarsenic trioxide	Weed killer and wood preservative, and a decolourising agent for glass and enamel		<0.1% w/w	1907/2006/EC REACH
Sodium dichromate	Used as a mordant for acid dyes, leather tanning, preparation of ceramic glazes, manufacture of pigments and as corrosion inhibitors in paint	Possibly found in some items within the home range	<0.1% w/w	1907/2006/EC REACH
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	Used as a fragrance ingredient	Household and beauty products are the most likely area of use	<0.1% w/w	1907/2006/EC REACH
Hexabromocyclododecane (HBCDD)	Used as a flame retardant for expanded polystyrene (EPS), high impact polystyrene (HIPS), and also in textiles (particularly upholstery)	Packaging with EPS is a clear area of concern, along with AV housing that may utilise HIPS.	<0.1% w/w	1907/2006/EC REACH
Short chain chlorinated paraffins (SCCPs)	Used as a flame retardant in rubbers, plastics (particularly PVC), along with use in textiles and adhesives/sealants.	Products that use rubber and PVC.	<0.1% w/w	1907/2006/EC REACH
Bis(tributyltin)oxide (see also alkyl tins)	Used as a algicide in marine paints, backcoating of upholstery textiles	Use in ASDA products is unlikely.	<0.1% w/w	1907/2006/EC REACH
Lead hydrogen arsenate	Used in pesticides and insecticides, glass goods, plastic/PVC products and possibly by the semi-conductor industry.	Possible use in some electronics and electrical equipment (circuit boards)	<0.1% w/w	1907/2006/EC REACH
Triethyl arsenate	Used as an intermediate in semi-conductor manufacturing, glass goods, plastic/PVC products, textiles and cosmetic	Possible use in some electronics and electrical equipment	<0.1% w/w	1907/2006/EC REACH

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DEHP (bis(2-ethyhexyl) phthalate)	Plasticiser for PVC, adhesives, sealants, cosmetics and printing films	Products that utilise PVC, including textiles, and some cosmetics.	<0.1% w/w	1907/2006/EC REACH
BBP (benzyl butyl phthalate)	Plasticiser for PVC, adhesives, sealants, cosmetics and printing films	Products that utilise PVC, including textiles, and some cosmetics.	<0.1% w/w	1907/2006/EC REACH
DBP (dibutyl phthalate)	Plasticiser for PVC, adhesives, printing inks, cosmetics, sealants, groutings and paint.	Products that utilise PVC, including textiles, and some cosmetics.	<0.1% w/w	1907/2006/EC REACH

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Appendix I

List of banned amines, formed through the reductive cleavage of azodyes, in accordance with 2002/61/EC

	Amine	CAS Number
1	biphenyl-4-ylamine 4-aminobiphenyl xenylamine	92-67-1
2	benzidine	92-87-5
3	4-chloro-o-toluidine	95-69-2
4	2-naphthylamine	91-59-8
5	o-aminoazotoluene 4-amino-2',3-dimethylazobenzene 4-o-tolylazo-o-toluidine	97-56-3
6	5-nitro-o-toluidine	99-55-8
7	4-chloroaniline	106-47-8
8	4-methoxy-m-phenylenediamine	615-05-4
9	4,4'-methylenedianiline 4,4'-diaminodiphenylmethane	101-77-9
10	3,3'-dichlorobenzidine 3,3'-dichlorobiphenyl-4,4'-ylenediamine	91-94-1
11	3,3'-dimethoxybenzidine o-dianisidine	119-90-4
12	3,3'-dimethylbenzidine 4,4'-bi-o-toluidine	119-93-7
13	4,4'-methylenedi-o-toluidine	838-88-0
14	6-methoxy-m-toluidine p-cresidine	120-71-8
15	4,4'-methylene-bis-(2-chloro-aniline) 2,2'-dichloro-4,4'-methylene-dianiline	101-14-4
16	4,4'-oxydianiline	101-80-4
17	4,4'-thiodianiline	139-65-1
18	o-toluidine 2-aminotoluene	95-53-4
19	4-methyl-m-phenylenediamine	95-80-7
20	2,4,5-trimethylaniline	137-17-7
21	o-anisidine 2-methoxyaniline	90-04-0
22	4-amino azobenzene	60-09-3

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