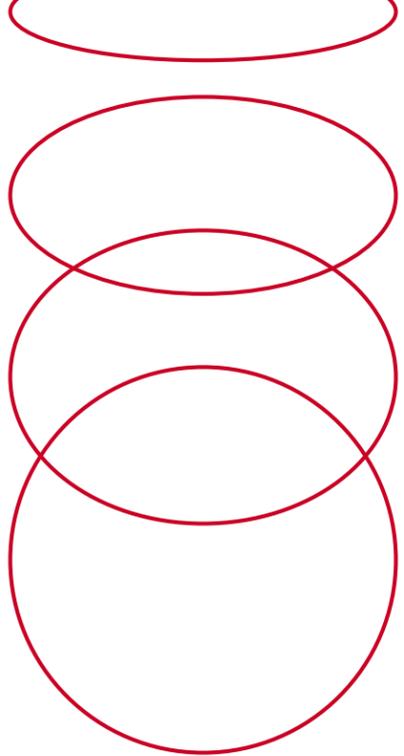


Global fashion industry regulatory updates: what's new for textile and leather





The next regulatory updates for textile and leather

From new harmonized standards to specific regulation updates, UL Solutions is here to help keep you up to date on changes on the horizon for the textile and leather industry.

Here we highlight some major regulatory changes so you can be prepared to continue creating compliant products for adults and children around the world. Our experts stand ready to answer any questions you may have about these upcoming changes.

United States

CPSC revises Standard for Flammability of Clothing Textiles

Enforcement date: April 22, 2024

The U.S. Consumer Product Safety Commission (CPSC) is amending the Standard for the Flammability of Clothing Textiles. The revisions clarify existing provisions, expand permissible equipment and materials for testing, and update equipment requirements that are outdated. The CPSC issues this amendment under the authority of the Flammable Fabrics Act.

The rule also incorporates by reference AATCC LP1–2021 (Home Laundering: Machine Washing). The standard applies to all items of clothing and fabrics intended to be used for clothing (i.e., articles of wearing apparel), whether for adults or children, for daywear or nightwear, with certain listed exclusions.

[Official source](#)



Reese’s Law — 16 CFR Part 1263, Safety Standard for Button Cell or Coin Batteries and Consumer Products Containing Such Batteries

Enforcement date: consumer products (for general use) containing or designed to use button cell or coin battery for products manufactured or imported on or after Oct. 23, 2023 (88 FR 65274): enforcement discretion through March 19, 2024.

Consumer products (for children) containing or designed to use button cell or coin battery for products manufactured or imported on or after Dec. 20, 2023 (88 FR 65274): enforcement discretion through March 19, 2024

The U.S. CPSC, in partnership with the American Academy of Pediatrics, estimates that in the United States there were 70,322 battery-related emergency department visits among children less than 18 year of age from 2010 to 2019, a dramatic increase from an estimated 40,400 visits from 1990 to 2009. The highest percentage of these cases were for children 5 years of age or younger.

Reese’s Law (Public Law No. 117-171 Aug.16, 2022)

To protect children and other consumers against hazards associated with the accidental ingestion of button cell or coin batteries by requiring the CPSC to promulgate a consumer product safety standard to require child-resistant closures on consumer products that use such batteries, and for other purposes.

This covers a wide range of consumer products across many retail markets. Some examples include (but are not limited to) products such as:

- Softlines wearing apparel — e.g., hats with lights, children costumes and footwear, such as light-up shoes
- Hardlines general merchandise — e.g., flashlights, LED candles and remote controls

The term “consumer product containing button cell or coin batteries” means a consumer product containing or designed to use one or more button cell or coin batteries, regardless of whether such batteries are intended to be replaced by the consumer, included with the product or sold separately.

Pursuant to section 2 of Reese’s Law, the CPSC established 16 CFR part 1263, which incorporates by reference ANSI/UL 4200A-2023 (the Standard for Safety Products Incorporating Button Batteries or Coin Cell Batteries) as the mandatory Standard and includes

[Official source 1](#)
[Official source 2](#)

the following requirements for consumer products containing or designed to use button cell or coin batteries:

- Battery compartments containing replaceable button cell or coin batteries must be secured such that they require the use of a tool or at least two independent and simultaneous hand movements to open.
- Button cell or coin battery compartments must not allow such batteries to be accessed or liberated as a result of use and abuse testing.
- The packaging for the overall product must bear a warning.
- The product itself must bear a warning, if practicable.
- Accompanying instructions and manuals must include all of the applicable warnings.

Also pursuant to section 2 of Reese’s Law, the CPSC established warning label requirements for the packaging of button cell or coin batteries. These are found in 16 CFR § 1263.4.

Section 3 of Reese’s Law requires special packaging (child-resistant and senior-friendly packaging) for button cell or coin batteries, whether sold separately or included with a consumer product.

eFiling, Supplemental Notice of Proposed Rulemaking: Certificates of Compliance



Enforcement date: proposed rule published Dec. 8, 2023; expected publication in Q4 2024

The U.S. Consumer Product Safety Commission (CPSC) issued a supplemental notice of proposed rulemaking (SNPR) to revise the agency's rule for Certificates of Compliance (certificates).

The SNPR proposes to align the certificate rule with other CPSC rules on testing and certification, and to implement, for imported CPSC-regulated products and substances, electronic filing of certificates (eFiling) with U.S. Customs and Border Protection (CBP).

The aforementioned certificates consist of the General Conformity Certificate (GCC) for consumer products not intended for children, as well as a Children's Product Certificate (CPC) for products intended for children 12 years of age or younger. The applicable technical data from either of these certificates will need to be electronically filed with the CPSC upon importation into the United States.

This part:

- Specifies the entities that must issue certificates for finished products in accordance with section 14(a) of the Consumer Product Safety Act (CPSA), as amended, 15 U.S.C. 2063(a)
- Specifies certificate content, form, and availability requirements that must be met to satisfy the requirements of section 14 of the CPSA
- Requires importers to file certificates electronically (eFile) with CBP for imported finished products that are required to be certified
- Clarifies which provisions of this part apply to component part certificates

This part does not address the type or frequency of testing necessary to support a certificate.

[Official source](#)

It is important to highlight that, in addition to the information on the content of CPC and GCC, the proposed rule also requests for finished products that are manufactured outside the United States and offered for importation into the United States for consumption or warehousing are required to be eFiled.

In the case of finished products that are manufactured outside of the United States and imported as a mail shipment, the finished product certifier must enter the GCC or CPC data elements required under § 1110.11 into the CPSC's Product Registry prior to the product or substance arriving in the United States.

The proposed rule also specifies certificate availability:

- § 1110.13(b) Furnishing certificates — A finished product certifier must furnish a required GCC or CPC to each distributor or retailer of the finished product.
- § 1110.13(c) Availability — Certifiers must make certificates available for inspection immediately, meaning within 24 hours, upon request by CPSC or CBP.

An electronic certificate meets the requirements of § 1110.13(b) and (c) if it is identified prominently on the finished product, shipping carton, or invoice by a unique identifier and can be accessed via a World Wide Web uniform resource locator (URL) or other electronic means, provided that the certificate, the URL or other electronic means, and the unique identifier are accessible, along with access to the electronic certificate itself, to the Commission, CBP, distributors, and retailers, on or before the date the finished product is distributed in commerce. If the electronic certificate is password protected, the password must be provided at the same time as the certificate when requested by CPSC or CBP.

The CPSC proposes that a final rule for revisions to 16 CFR part 1110 will become effective 120 days after publication in the Federal Register.



Europe

Revision of Textile Labelling Regulation 1007/2011

Enforcement date: Expected in late 2024 or 2025; public consultation is open from Dec. 19, 2023, to April 15, 2024

This initiative revises EU textile labeling rules by introducing comprehensive requirements on the physical and digital labelling of textiles and related products.

It addresses shortcomings of the current rules as well as diverging labeling requirements among Member States. Its principal aims are to:

- Ensure accurate, intelligible and comparable information to consumers, notably on environmentally relevant aspects.
- Reduce compliance costs.
- Ensure regulatory clarity and consistency.

[Official source](#)

Options will be explored to revise the text of the current regulation to clarify and update rules for fiber identification, as well as to consider digital labeling — building on the proposed architecture for the Digital Product Passport, language-independent symbols or codes, and a sustainability and circularity label. Additional labeling domains will also be explored, such as origin (“made in”); EU-wide uniform size; care labeling; presence of allergenic substances; leather and fur authenticity (enlarging the scope of the regulation beyond textile products); flammability, organic/bio-origin; and socially responsible production of textiles and related products.



Regulation (EU) 2023/988 of the European Parliament and of the Council of May 10, 2023, on general product safety (GPSR)



Enforcement date: Dec. 13, 2024

On May 23, 2023, the European Commission published Regulation (EU) 2023/988 on general product safety, also known as the General Product Safety Regulation (GPSR).

The new regulation will replace General Product Safety Directive (GPSD) 2001/95/EC after a transitional period ending on Dec. 13, 2024.

Directive 2001/95/EC has been reviewed and updated to consider the following:

- The developments related to new technologies (e.g., interconnectivity, cybersecurity and artificial intelligence (AI))
- The increasing use of online selling.
- The need to ensure consistency with developments in union harmonization legislation and standardization legislation.
- The better functioning of product safety recalls.

- The need for a clearer framework for food-imitating products hitherto regulated by Council Directive 87/357/EEC.

The new regulation applies to products placed or made available on the European market, whether new, used, repaired or reconditioned. It covers every kind of product, whether or not it is interconnected to other items, supplied or made available, that is intended for consumers or is, under reasonably foreseeable conditions, likely to be used by consumers even if not intended for them.

Among other changes, the new regulation provides:

- Clear identification of economic operators (manufacturer, authorized representative, importer, distributor and fulfillment service provider) and their duties, including obligations that apply in case of distance sales.
- New and detailed rules for providers of online marketplaces that shall identify their single point of contact for the Safety Gate Portal and also for consumer communication.
- Improved and more detailed safety requirements and aspects for assessing the safety of products, which include, among others:
 - The categories of consumers using the product, in particular by assessing the risk for vulnerable consumers such as children, older people, and persons with disabilities, as well as the impact of gender differences on health and safety.
 - Visual attributes of the product that are likely to lead consumers to use the product in a way

that is different from what it was designed for, such as when a non-foodstuff product resembles food, or when a product that is neither designed nor intended for use by children resembles an object commonly recognized as appealing to or intended for use by children.

- The need for the manufacturer to carry out a risk analysis and draw up technical documentation containing at least a general description of the product and its essential characteristics relevant for assessing its safety and, where appropriate, an analysis of the possible risks related to the product and the solutions adopted to eliminate or mitigate such risks, including the outcome of any reports related to tests conducted and the list of any relevant European standards applied to meet the general safety requirement
- Establishment of necessary tools for national authorities, thus stepping up their enforcement powers

[Official source](#)



Textiles: European Norms under revision

Publication date: expected in 2024 or 2025

Working group of CEN TC 248 — Textiles and Textile Products

These are particularly relevant when assessing whether a product is a safe product and to analyze some possible risks related to the product:

- EN 14682, Safety of Children's Clothing — Cords and Drawstrings on Children's Clothing — Specifications
- CEN/TS 16792, Safety of Children's Clothing — Requirements and Guidance for the Design and Manufacture of Children's Clothing — Mechanical Safety — This work item is for the revision of CEN/TR 16792:2014 and to change the deliverable from a technical report (TR) to a technical specification (TS)
- EN 16732, Slide Fasteners (Zips) — Specification
- EN 16781, Textile Childcare Articles — Safety Requirements and Test Methods for Children's Sleep Bags for Use in a Cot

Textile: European Norms under development

These are particularly relevant standardization works in the field of the circular economy of textile materials:

- Textiles — Circular Economy for Textile Products — Categorization of and Requirements on Non-virgin Input Materials
- Textiles — Circular Economy for Textile Products — Design for Circularity
- Textiles — Circular Economy for Textile Products — General Principles and Guidance
- CEN/TS XXX (number to be defined) — Textiles — Circular Economy for Textile Products — Minimum Requirements for Clothing



The following standards are under revision or draft for textile products' chemical considerations:

- FprEN 17134-1, Textiles and Textile Products — Determination of Biocide Additives — Part 1: 2-Phenylphenol and Triclosan, Method Using Liquid Chromatography
- prEN 17131-1 rev, Textiles and Textile Products — Determination of Certain Residual Solvents — Part 1: Determination of Aprotic Solvents, Method Using Gas Chromatography
- prEN 17131-2, Textiles and Textile Products — Determination of Certain Residual Solvents — Part 2: Determination of Benzene, Method Using Headspace Gas Chromatography
- prEN 17134-3 rev, Textiles and Textile Products — Determination of Biocide Additives — Part 3: Permethrin, Method Using Liquid Chromatography
- prEN 17137, Textiles — Determination of the Content of Compounds Based on Chlorobenzenes and Chlorotoluenes
- prEN 17681-1, Textiles and Textile Products — Per- and Polyfluoroalkyl Substances (PFAS) — Part 1: Analysis of an Alkaline Extract Using Liquid Chromatography and Tandem Mass Spectrometry Textiles
- prEN ISO 13144, Determination of Quinoline, Isoquinoline and Certain Derivatives

Leather: European Norms under development

Publication date: expected in 2024 or 2025

Working group of CEN TC 289 — Leather Products

These are particularly relevant when assessing a product's safety and analyzing possible risks related to the product:

- ISO/DIS 17234-1:2023, Leather — Chemical Tests for the Determination of Certain Azo Colorants in Dyed Leathers — Part 1: Determination of Certain Aromatic Amines Derived From Azo Colorants

There are also pertinent standards under draft for chemicals used in leather tanning industry:

- prEN ISO 21135, Chemicals for the Leather Tanning Industry — Determination of the Total Content of Certain Bisphenols
- prEN ISO 2419, Chemicals for the Leather Tanning Industry — Determination of Cyclosiloxanes in Waterproofing Fatliquors



New EU restriction of formaldehyde: Regulation (EU) 2023/1464

Enforcement date: Aug. 6, 2026

On July 14, 2023, the European Commission published a new entry in Annex XVII of Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regarding formaldehyde and formaldehyde releasers.

The restriction specifies that formaldehyde and formaldehyde releasers shall not be placed on the market in articles after Aug. 6, 2026, if, under the test conditions specified in Appendix 14, the concentration of formaldehyde released from those articles exceeds:

- 0.062 mg/m³ for furniture and wood-based articles
- 0.080 mg/m³ for articles other than furniture and wood-based articles

Such substances shall not be placed on the market in road vehicles after Aug. 6, 2027, if, under the test conditions specified in Appendix 14, the concentration of formaldehyde in the interior of those vehicles exceeds 0.062 mg/m³.

Formaldehyde and formaldehyde-releasing substances are manufactured and used in multiple areas in the EU. Formaldehyde is mostly used as a chemical intermediate to manufacture formaldehyde-based resin and other chemicals and has limited applications as a biocide. Formaldehyde releasers are mainly used in producing articles such as textiles, wall coverings, wood-based products, furniture and foams that can release formaldehyde during use.

Articles subject to restrictions on carcinogenic, mutagenic and reprotoxic (CMR) materials in the textiles restriction (within the scope of Entry 72 of Annex XVII of Regulation (EC) No. 1907/2006) and the use of formaldehyde and formaldehyde releasers as a biocide are exempted from the restriction in the new entry in

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REACH Annex XVII.

Other exemptions apply to:

- Articles made from materials that exclusively naturally contain formaldehyde or formaldehyde-releasing substances
- Articles that are exclusively for outdoor use under foreseeable conditions
- Articles in constructions for exclusive use outside the building shell and vapor barrier and that do not emit formaldehyde into indoor air
- Articles exclusively for industrial or professional use unless formaldehyde released from them leads to exposure to the general public under foreseeable conditions of use
- Devices within the scope of Regulation (EU) 2017/745
- Personal protective equipment within the scope of Regulation (EU) 2016/425
- Articles intended to come into contact directly or indirectly with food within the scope of Regulation (EC) No. 1935/2004
- Secondhand articles

To mitigate the impact, decrease costs for the affected areas and provide sufficient time for stakeholders to implement the restrictions, the transition period for applicability of the restrictions is 36 months for all sectors. For road vehicles, a deferral of 48 months is deemed appropriate due to the long development and marketing time for such products; the high material requirements in the automotive industry; the complex supply chains, including original equipment manufacturers; and the time needed to implement the standard analytical method for measuring emissions for trucks and buses.

New EU restriction of synthetic polymer microparticles: Regulation (EU) 2023/2055, Restriction of Microplastics Intentionally Added to Products

Enforcement date: Oct. 17, 2023, but specific products have longer transition periods until Oct. 2031

The European Commission (EC) has published Commission Regulation (EU) 2023/2055, amending Annex XVII to Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation (EC) No. 1907/2006.

This update includes a new restriction in entry 78, which concerns synthetic polymer microparticles (SPMs).

The entry states that SPMs cannot be used when “they are present to confer a sought-after characteristic in mixtures in a concentration equal to or greater than 0.01% by weight.”

This restriction aligns with the European Union’s (EU’s) strategy to eliminate plastic pollution. It prohibits the sale of microplastics as such, products to which microplastics have been intentionally added and that release those microplastics when used.

The regulation will also require manufacturers to report the estimated microplastics pollution caused by their products every year. In this regard, the EC has recently proposed a regulation preventing pellet losses that will be discussed by the European Parliament and the Council. All economic operators, both inside and outside the EU, will need to comply with the requirements set out in this regulation within 18 months of its entry into force.

The EC has released a Questions and Answers (Q&A) document to clarify the exemptions listed in paragraph 5 of the restriction. Specific exemptions are given for:

- SPM that are contained by technical means so that releases to the environment are prevented when

[Official source 1](#)
[Official source 2](#)

[Official source 3](#)
[Official source 4](#)



used in accordance with the instructions for use during the intended end use

- SPM the physical properties of which are permanently modified during intended end use in such a way that the polymer no longer falls within the scope of this entry
- SPM that are permanently incorporated into a solid matrix during intended end use (e.g., filled materials in toys and SPM that forms films)

In particular, the EC has clarified that loose plastic glitter, unless it is biodegradable or soluble, intended for uses without a transition period has been banned as of Oct. 17, 2023.

However, plastic glitter is not affected by the ban if, when used, it is trapped in a solid matrix (e.g., glitter glue), solid films (e.g., paints and inks) or solid objects (e.g., inside jewelry, spray can caps, etc.) or is fully contained in articles or attached to articles.

Still, for some of these products, starting in October 2025, manufacturers will be required to provide instructions for use and disposal, explaining to professional users and the general public how to prevent the release of synthetic polymer microparticles into the environment.

The EC has also clarified that, in the case of glittered articles such as textiles used in garments or footwear, glitter is always regarded as an integral part of the article, and these articles can be considered out of the scope of the restriction.

The EC is still working on a detailed Q&A document to support the implementation of the new rules, expected to be published in 2024. This document will also clarify how and if the microplastics restriction impacts textiles.

Persistent organic pollutants (POP) – draft restriction under revision covered by Regulation (EU) 2019/1021

Enforcement date: expected in late 2024 or 2025

Hexabromocyclododecane

The European Commission has proposed a revision to the EU's regulation on persistent organic pollutants (POPs), with reference to hexabromocyclododecane (HBCDD). The draft delegated regulation aims to reduce the limit for HBCDD from 100 mg/kg (0.01% to 75mg/kg in substances, mixtures or articles, including those used in flame-retarded articles.

HBCDD, known for its persistent, bioaccumulative and toxic (PBT) properties, is listed in Annex I of the EU POPs regulation, which adheres to the Stockholm Convention. It is also on the REACH candidate list and is subject to authorization.

The commenting period was closed in December 2023.

[Official source 1](#)

[Official source 2](#)

Perfluorooctane sulfonic acid

The European Commission has proposed a revision to the EU's regulation on persistent organic pollutants (POPs), with reference to perfluorooctane sulfonic acid (PFOS), its salts and PFOS-related compounds.

The proposal will reduce the maximum PFOS concentration allowed as unintentional trace contaminant in substances, mixtures and articles and will remove the last specific exemption allowed in the EU because it is no longer needed.

The proposed limits are:

- Concentrations of PFOS or any of its salts equal to or less than 0.025 mg/kg (0.0000025% by weight) where it is present in substances, mixtures or in articles
- Sum of concentrations of all PFOS-related compounds equal to or less than 1 mg/kg (0.0001% by weight) where they are present in substances, mixtures or articles



Asia Pacific

China

In China, standard changes are relatively frequent. Here a list of most recent updated standards relevant to the softlines sector.

Standard code	Standard name	Replaced standar code	Implementation date
FZ/T 73017-2023	Knitted Homewear	FZ/T 73017-2014	July 1, 2024
GB/T 32614-2023	Outdoor Sportswear – Water resistant garment	GB/T 32614-2016	April 1, 2024
FZ/T 80007.1-2023	Test Method for Peeling Strength of Garments Using Adhesive Interlining	FZ/T 80007.1-2006	July 1, 2024
FZ/T 80007.2-2023	Test Method for Wet Wash Resistance of Garments Using Adhesive Interlining	FZ/T 80007.2-2006	July 1, 2024
FZ/T 80007.3-2023	Dry Wash Garments Using Adhesive Interlining	FZ/T 80007.3-2006	July 1, 2024





Australia — Consumer Goods (Care Labelling) Information Standard 2023

Enforcement date: The mandatory standard provides transition periods to assist suppliers to adjust to the new requirements. From Sept. 5, 2023, to March 4, 2024, suppliers must continue to provide a care label written in English but can additionally provide care symbols if they wish. Starting March 5, 2024, suppliers can choose to provide a care label that is written in English, uses care symbols or both.

The mandatory standard, the Consumer Goods (Care Labelling) Information Standard 2023, sets out the mandatory requirements for the labelling of a variety of prescribed products.

This mandatory standard is based on certain sections of the voluntary Australian/New Zealand standard AS/NZS 1957:1998, Textiles — Care Labelling, and the international standard ISO 3758:2012, Textiles — Care Labelling Code Using Symbols.

Suppliers may provide extra information, such as care instructions in other languages, provided the requirements of the mandatory standard are met.

Japan — draft revision of the Consumer Product Safety Act, Electrical Appliances and Materials Safety Act, Gas Business Act and Act on the Securing of Safety and the Optimization of Transaction of Liquefied Petroleum Gas

Enforcement date: December 2025 (proposed)

On Dec. 20, 2023, Japan notified the World Trade Organization (WTO) of a proposed revision of four existing Japanese regulations:

- Consumer Product Safety Act.
- Electrical Appliances and Materials Safety Act.
- Gas Business Act.
- Act on the Securing of Safety and the Optimization of Transaction of Liquefied Petroleum Gas.

The products impacted by this revision are consumer products, electrical appliances and materials, gas/liquefied petroleum gas (LPG) equipment and appliances. Additional covered products will be designated in a cabinet order issued under the Consumer Product Safety Act (children's products including toys are currently being considered).

The main purposes of this revision are the following:

- The clarification that overseas operators that sell products directly to general consumers in Japan without going through manufacturers

and importers in Japan are subject to the four regulations cited above. In addition, the revision will contain requirements including that the overseas operators shall appoint a responsible person in Japan and measures allowing the authorities to ask to the digital platform providers to take corrective measures (like the recall of products in case of risk) as well as to disclose the name of the manufacturer/importer/responsible person.

- The introduction of specific rules for children's products including toys, in particular for labeling/marketing requirements. In this regard, implementing Orders will mandate the marking/labeling requirements and the specific children's products subjected.

The proposed date of adoption corresponds to June 2024, and the proposed date of entry into force is from December 2025.

[Official source](#)



Per- and polyfluoroalkyl substances — Global regulatory developments

Perfluorooctanesulfonic acid (PFOS), perfluorooctanoic acid (PFOA) and perfluorohexanesulfonic acid (PFHxS) are listed in the Stockholm Convention for global restriction and elimination. Various countries in the world (not limited to the EU) have followed Stockholm Convention and regulated these substances in articles with different date of application. In EU PFOS are restricted since 2010 while other substances like PFHxS entered into force since 2023. Longchain perfluorocarboxylic acids (PFCAs) are instead listed under REACH Regulation at entry 68 of Annex XVII.



Several per- and polyfluoroalkyl substances (PFAS) — e.g., GenX and perfluorobutanesulfonic acid (PFBS) — are identified as substances of very high concern (SVHCs) under the EU REACH legislation. This means that manufacturers, suppliers and retailers must communicate throughout the supply chain about the presence of these substances in articles if they contain more than 0.1% of any SVHC substance.

In 2023, the European Chemicals Agency (ECHA) published an EU-wide restriction proposal of all nonessential uses of the entire group of PFAS.

When adopted, the restriction will ban the manufacturing, placing on the market and use of PFAS as such, as constituents in other substances, in mixtures and in articles above a set concentration limit. Almost no exemptions or transition periods are proposed for textiles sector, which includes textiles, upholstery, leather, apparel, carpets, etc.

On June 19, 2023, the European Commission (EC) submitted a draft amendment to amend the REACH Annex XVII by adding the new restriction on undecafluorohexanoic acid (PFHxA), its salts and PFHxA-related substances. The restriction also will be applicable to finished products including textiles.

In January 2024, the feedback period related to the proposal of new limits for the maximum PFOS concentration allowed as unintentional trace contaminant in substances, mixtures and articles was closed. The last specific exemption will be removed in the EU because it is no longer needed.

The United States has at the federal level the following obligation, according to Section 8(a) (7) of the Toxic Substances Control Act (TSCA) published in October 2023. The rule established a one-time reporting requirement for any entity that has manufactured or imported a chemical substance, mixture, or article containing PFAS for commercial purposes at any time since 2011. This is a reporting rule, not a ban. The rule does not include a list of specifically identified substances. Instead, it applies to PFAS as a chemical category defined by molecular structure, so not all PFAS are covered. More specifically, the rule defines PFAS as any chemical substance or mixture containing a chemical substance that structurally contains at least one of the following three substructures:

- $R-(CF_2)-CF(R')R''$, where both the CF_2 and CF moieties are saturated carbons.
- $R-CF_2OCF_2-R'$, where R and R' can either be F , O , or saturated carbons.
- $CF_3C(CF_3)R'R''$, where R' and R'' can either be F or saturated carbons.



This rule requires entities that have manufactured PFAS or imported PFAS or articles containing PFAS between Jan. 1, 2011, and Dec. 31, 2022, to report them. All information must be submitted during the applicable submission periods which run from Nov. 12, 2024, to Nov. 10, 2025, for small businesses that are subject to reporting based solely upon the importation of PFAS-containing articles, and from Nov. 12, 2024, to May 8, 2025, for all other entities subject to the reporting requirements.

Unlike other TSCA reporting rules, the PFAS reporting rule includes no de minimis concentrations or production volume thresholds below which reporting is not required.

In addition to the federal requirements, states also are passing legislation and regulations to phase out PFAS in products sold in their states in favor of safer alternatives.

For example, laws in Maine, Minnesota and Washington have given state agencies the authority to ban PFAS in a wide range of products. Maine and Minnesota's laws require manufacturers to disclose the presence of PFAS. Several states have adopted restrictions on PFAS in textiles:

- California has banned PFAS in almost all textiles.
- New York has restricted PFAS in apparel
- Colorado and Minnesota have banned PFAS in upholstered furniture
- Washington has moved forward on regulatory actions concerning the use of PFAS in many categories of textile products.
- Eight states (California, Colorado, Maine, Maryland, Minnesota, New York, Vermont and Washington) have adopted restrictions on PFAS in carpets, rugs and aftermarket treatments.
- Washington is evaluating safer alternatives for PFAS in products such as apparel and has established a timeline to adopt restrictions by 2025.

[Official source 1](#)

[Official source 2](#)

[Official source 3](#)



How UL Solutions can help

Our extensive portfolio of services includes testing, chemical management, production monitoring, sustainability and supply chain management programs.

In addition, we can assist you in building customized quality assurance programs that, by meeting your specific needs, help you mitigate the risk of costly recalls and protect your brand's reputation.

We can evaluate textile, apparel and leather products for regulatory and brand compliance at our highly equipped laboratories around the world.

UL Solutions performs in-depth and rigorous chemical, microbiological, physical, mechanical, flammability and performance analyses to assess compliance risks and evaluate whether your products comply with safety and performance requirements. We use recognized methods to test compliance to international regulations and standards, including:

- International Organization for Standardization (ISO)
- EU Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
- U.S. Consumer Product Safety Improvement Act (CPSIA)
- European Standard (EN)
- Chinese National Standard (China GB)
- British Standard (BS)
- German Institute for Standardization (DIN)

Contact us at RCP@ul.com or visit UL.com/fashion-luxury-solutions to learn more about our broad portfolio of offerings for the textile and leather industry and set up your softlines testing program.



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