

## [Manufacturing Restricted Substances List]

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### Object and field of application

[MRSL, Manufacturing Restricted Substance List details the restriction limits applicable to the chemical formulations used in the manufacturing processes of all Burberry textile and leather product and includes the guideline for implementation]

### Linked document

F-MAN-SUST-01-EN

### Definition and abbreviation

### Revision

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**BURBERRY**  
**ESTABLISHED 1856**

**MANUFACTURING  
RESTRICTED  
SUBSTANCES LIST**

**AND**

**IMPLEMENTATION  
GUIDELINES**

**VERSION JANUARY 2016**

## 1.0 INTRODUCTION

*Burberry's Manufacturing Restricted Substance List (MRSL)<sup>1</sup> details the restriction limits applicable to the chemical formulations used in the manufacturing processes of all Burberry textile and leather product.*

*Burberry's MRSL is fully complicit with the ZDHC MRSL, with the exception of Per- and Poly-Fluorinated Chemicals, where Burberry's restrictions include all Long and Short Chained PFCs. This document also includes guidance for implementation of the MRSL.*

*Burberry Group PLC, London, January 2016*

<sup>1</sup> Burberry retains the right to update the MRSL periodically and will ensure any new materials of concern that may be highlighted by Regulatory bodies and Industry experts are included accordingly

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### 3.0 MRSL

Burberry has adopted the ZDHC MRSL that can be found at this link: [ZDHC MRSL version 1.1 \(2015\)](#) with the additional restrictions of all PFCs as listed in the MRSL addendum below (3.1).



### 3.1 MRSLS ADDENDUM

Manufacturing Restricted Substances	CAS Number	Limit	
		Textile Formulations	Leather Formulations
<b>Perfluorinated and Polyfluorinated Chemicals- Long Chain (PFCs) are banned from use</b>			
Perfluorooctane sulfonate (PFOS) and related substances	Multiple	SUM < 2PPM	SUM < 2PPM
Perfluorooctanoic acid (PFOA)	335-67-1	2 PPM	2 PPM
2-(N-ethylperfluoro-1-octanesulfonamido)-ethanol (EtFOSE)	1691-99-2	2 PPM	2 PPM
Perfluoro-3,7-dimethylotanoic Acid (PF-3,7-DMOA)	172155-07-6	2 PPM	2 PPM
1H,1H,2H,2H- Perfluorooctylacrylate (6:2 FTA)	17527-29-6	2 PPM	2 PPM
1H,1H,2H,2H- Perfluorododecylacrylate (10:2 FTA)	17741-60-5	2 PPM	2 PPM
Perfluoroundecanoic acid (PFUdA)	2058-94-8	2 PPM	2 PPM
1H,1H,2H,2H- Perfluorooctanesulphonic acid (1H,1H,2H,2H-PFOS)	27619-97-2	2 PPM	2 PPM
1H,1H,2H,2H- Perfluorodecylacrylate (8:2 FTA)	27905-45-9	2 PPM	2 PPM
Perfluorododecanoic acid (PFDoA)	307-55-1	2 PPM	2 PPM
N-methylperfluoro-1-octanesulfonamide (MeFOSA)	31506-32-8	2 PPM	2 PPM
perfluorodecanoic acid (PFDA)	335-76-2	2 PPM	2 PPM
2H,2H,3H,3H- Perfluoroundecanoic Acid (H4PFUnA)	34598-33-9	2 PPM	2 PPM
perfluorononanoic acid (PFNA)	375-95-1	2 PPM	2 PPM
Perfluorotetradecanoic acid (PFTeA)	376-06-7	2 PPM	2 PPM
N-ethylperfluoro-1-octanesulfonamide (EtFOSA)	4151-50-2	2 PPM	2 PPM
perfluoroundecanoic acid (PFUnA)	4234-23-5	2 PPM	2 PPM
1H,1H,2H,2H-Perfluoro-1-Decanol (8:2 FTOH)	678-39-7	2 PPM	2 PPM
perfluorotridecanoic acid (PFTrA)	72629-94-8	2 PPM	2 PPM
perfluorooctane sulfonamide (PFOSA)	754-91-6	2 PPM	2 PPM
1H,1H,2H,2H-Perfluoro-1-Dodecanol (10:2 FTOH)	865-86-1	2 PPM	2 PPM
7H-Dodecafluoroheptanoic Acid	No CAS available	2 PPM	2 PPM
2H,2H-Perfluorodecane Acid	No CAS available	2 PPM	2 PPM
1H,1H,2H,2H-Perfluorooctanesulphonic acid	No CAS available	2 PPM	2 PPM
<b>Short Chain PFCs are banned from use</b>			
Perfluorocyclobutane- c-C4F8	115-25-3	2 PPM	2 PPM
7H-dodecafluoroheptanoate (HPFHpA)	1546-95-8	2 PPM	2 PPM
1H,1H,2H,2H-Perfluoro-1-Hexanol (4:2 FTOH)	2043-47-2	2 PPM	2 PPM
Perfluoropentanoic acid (PFPA)	2706-90-3	2 PPM	2 PPM
Perfluoro-n-hexanoic acid (PFHxA)	307-24-4	2 PPM	2 PPM
Perfluoropentane – C5F14	355-42-0	2 PPM	2 PPM
Perfluorohexane sulphonates (PFHxS)	355-46-4	2 PPM	2 PPM
Perfluorobutanoic acid (PFBA)	375-22-4	2 PPM	2 PPM
Perfluorobutane (PFBS)	375-73-5	2 PPM	2 PPM
Perfluoroheptanoic acid (PFHpA)	375-85-9	2 PPM	2 PPM
Perfluoro-1-heptanesulfonic acid (PFHpS)	375-92-8	2 PPM	2 PPM
1H,1H,2H,2H-Perfluoro-1-Octanol (6:2 FTOH)	647-42-7	2 PPM	2 PPM

## 4.0 MRS L IMPLEMENTATION GUIDELINES

The purpose of this document is to:

- Provide guidance for the implementation of the MRS L
- Define minimum requirements for the implementation of the MRS L
- Establish requirements for monitoring and review of chemical conformance
- Define traceability requirements for raw material and chemical supply

## 5.0 SCOPE

Requirements for the implementation of the MRS L outlined in this document apply to all manufacturing processes associated with Burberry product.

This document shall be implemented as follows:

- **Burberry Finished Goods Vendors** shall implement this document for all in-house manufacturing processes, outsourced processes and to all upstream suppliers
- **Burberry Raw Material and Trims Suppliers** shall implement this document for all in-house manufacturing processes, outsourced processes and to all upstream suppliers

## 6.0 PROCESS

The MRS L process must be implemented by all direct and indirect suppliers of Burberry product.

This process requires the following steps:

- Commitment Assessment
- Management
- Monitor and Review

The Partner shall assign responsibility of the implementation process and on-going compliance with the MRS L to an employee, preferably with chemical management experience.

For the purposes of this document this person is referred to as the **Chemical Manager**.

## **6.1 Commitment Assessment**

Partners must review and document manufacturing processes and upstream suppliers to identify those relevant to Burberry product.

Partners must apply MRSL requirements to these processes and suppliers.

Partners must maintain a list of chemical formulations (chemical inventory) used in recipes for the manufacturing processes associated with Burberry product.

Partners shall evaluate chemical suppliers to ensure they understand and meet the requirements of the MRSL for all incoming formulation and chemical substances.

Partners shall request chemical suppliers to confirm compliance by providing a Positive List of non-hazardous chemical formulations.

Alternatively, chemical suppliers may provide a statement of compliance (Appendix 1).

## **6.2 Management**

The responsible Chemical Manager, with support from the Partner organisation must initiate a Chemical Management System (CMS) to support the implementation of the MRSL.

The CMS must consider all other Burberry Impact objectives. The application of the MRSL should not be in conflict with any of these objectives and activities. An example of this is where a chemical substitution has the potential to result in a significant increase of water usage.

The CMS must describe at a minimum:

- A chemical management policy (Appendix 2)
- A process to procure raw materials from suppliers who are MRSL compliant
- A process to procure chemical formulations that are MRSL compliant
- The operation and maintenance of a chemical inventory
- The requirement for upstream suppliers to comply with the MRSL

Minimum requirements for a chemical inventory are provided in Appendix 3.

Partners are fully accountable for their extended supply chain including Burberry nominated suppliers.

Partners are expected to implement ongoing training and education to employees and upstream suppliers to communicate these requirements and support implementation.

## **6.3 Monitor and Review**

On a regular basis the Chemical Manager shall monitor and review MRSL conformance.

This review must include at a minimum:

- A chemical management policy (Appendix 2)
- The requirement for upstream suppliers to comply with the MRSL
- A process to procure raw materials from suppliers who are MRSL compliant
- A process to procure chemical formulations that are MRSL compliant
- The operation and maintenance of a chemical inventory

Minimum requirements for a chemical inventory are provided in Appendix 3. Partners are fully accountable for their extended supply chain including Burberry nominated Suppliers. Partners are expected to implement on-going training and education to employees and upstream suppliers to communicate these requirements and support implementation.



## **7.0 RECORDS**

The following records shall be maintained to demonstrate compliance with the MRSL:

- Evidence of commitment to eliminate hazardous chemicals in the MRSL (Appendix 2)
- Documentation of all upstream supplier communications and actions
- Documentation of all sources of raw material associated with Burberry product including company of purchase and batch traceability
- Documentation of all sources of chemical formulations associated with Burberry product including company of purchase and batch traceability
- Record of operation and maintenance of chemical inventory (Appendix 3)

## **8.0 COMMUNICATION**

Burberry shall support all Partners in the implementation of this document.

Partners shall communicate to [project2020@burberry.com](mailto:project2020@burberry.com) any issues related to:

- Potential contamination
- Leftover or carry forward products
- Supplier collaboration
- Chemical formulation transition

Burberry encourages Partners to communicate where any potential conflict may arise between Burberry Impact Objectives or other sustainability objectives and the MRSL implementation process.

## **9.0 REFERENCES**

[Zero Discharge of Hazardous Chemicals \(ZDHC\) MRSL](#)

[Zero Discharge of Hazardous Chemicals \(ZDHC\) Roadmap to zero](#)

[Burberry Corporate Responsibility Programme](#)

## 10.0 DEFINITIONS

<b>CHEMICAL FORMULATION</b>	A proprietary mixture of chemical substances that is available for purchase from chemical suppliers under their own trade name
<b>PPM</b>	Parts Per Million, equivalent of mg/kg
<b>LIMIT</b>	Maximum contamination limit
<b>CAS NUMBER</b>	Unique numerical identifiers assigned by Chemical Abstracts Service to every chemical substance
<b>ZDHC</b>	Zero Discharge of Hazardous Chemicals, a group of major apparel and footwear brands and retailers who made a shared commitment to help lead the industry towards zero discharge of hazardous chemicals by 2020
<b>RAW MATERIAL, TRIMS SUPPLIER, PARTNER</b>	Any company who supplies goods or a service to Burberry PLC directly or indirectly, this includes but is not limited to printing, weaving, knitting, dyeing, processing etc
<b>UPSTREAM SUPPLIER</b>	Any sub-supplier of Burberry product
<b>FINISHED GOODS VENDORS</b>	Any company who supplies Burberry with finished goods
<b>NA</b>	Not Applicable
<b>PRSL</b>	Product Restricted Substances List
<b>MRS�</b>	Manufacturing Restricted Substances List

## 11.0 APPENDIX 1

### Chemical Supplier Statement of Compliance

Supplier: [CHEMICAL SUPPLIER COMPANY NAME]

Location: [COUNTRY]

Date: [XX.XX.XXXX]

To the attention of:

[PARTNER COMPANY NAME]

[Product A]

[Product B]

[Product ...]

The above products do not intentionally contain any substances listed in the MRSL.

The substances listed in the MRSL are not used during the manufacture of formulation or its ingredient to provide the properties of the finished product.

They may be present as trace impurities below limits of the MRSL.

Yours sincerely,

[Name]

[Job Title]

[Company]

## **12.0 APPENDIX 2**

**[Partner] Chemical Management Policy**

Supplier: [PARTNER COMPANY NAME]

Location: [COUNTRY]

Date: [XX.XX.XXXX]

[PARTNER ORGANISATION] are committed to the elimination of hazardous chemicals in all chemical formulations used in manufacturing processes associated with Burberry product.

We commit to the implementation of the MRSL and requirements outlined in the MRSL Guidance Document for all raw materials and chemical formulations associated with Burberry product.

This commitment extends to ensuring all chemical suppliers and upstream suppliers are meeting the minimum requirements of the MRSL implementation guideline.

We believe in the importance of eliminating these chemicals for the health of our employees, the environment and the public.

This document shall be reviewed annually as part of a Chemical Management Review.

Signed:

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Date:

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### **13.0 APPENDIX 3**

<b>Chemical Inventory Minimum Requirements</b>	
Formulator Name	
Formulator Address (incl. production location)	
Formulation Name	
CAS Number (if applicable)	
Invoice Reference	
Delivery Date	
Net Unit (+unit measure)	
MSDS	
MRSL Compliant (incl. Version)	
Certification Type (if applicable)	
Shelf Life	
Intended Use Category	

# 14.0 APPENDIX 4

## Self-assessment Questionnaire

Name \_\_\_\_\_ Date \_\_\_\_\_

		Answer (state yes/no)	Can you provide supporting evidence?
<b>1 Commitment</b>			
1.1	Have you been introduced to Burberry's commitment towards the elimination of hazardous chemicals?		
1.2	Have you read and understood the MRSL and its implementation guidelines?		
1.3	Has your organisation formed any commitment to eliminate hazardous chemicals from your Supply Chain?		
<b>2 Implementation – Internal</b>			
2.1	Do you have an "Environmental Management System" in place in your facility such as EMS 14001 or others?		
2.2	Do you have a "Chemical Management System" in place in your facility?		
2.3	Have you appointed a "Chemical Manager" or a point of contact for MRSL implementation?		
2.4	Have you communicated the MRSL and implementation guidelines within your organisation?		
2.5	Have you documented all sources of raw materials and processes relevant to Burberry products?		
2.6	Are you able to trace Burberry product back to the process recipes?		
2.7	Have you communicated the MRSL requirements to your raw material suppliers?		
2.8	Have you implemented a raw material testing program against Burberry's PRSL to ensure your upstream suppliers are compliant to MRSL?		
2.9	Have you communicated the MRSL requirements and specifically the BAN on APEOs, PFCs, Phthalates, SCCPs and CPs to your subcontractors?		
2.10	Have you communicated the MRSL requirements and specifically the BAN on APEOs, PFCs, Phthalates, SCCPs and CPs to your chemical suppliers?		
2.11	Have you documented all communications with your upstream suppliers?		
2.12	Have you requested the "Positive List of Chemicals" from your chemical suppliers?		
2.13	Have you received Positive Lists from all your chemical suppliers?		
2.14	Do you have a record of your own chemical inventory?		
2.15	Have you screened your chemical inventory against the Positive Lists received?		
2.16	Have you identified any non-compliant chemical formulation?		
2.17	Do you have a plan to replace the "non-compliant chemicals" with "compliant chemicals"?		
2.18	Do you have a review process to assess, correct and phase out non-compliant upstream suppliers?		
2.19	Have you established an internal testing program to ensure that your finished products are compliant to Burberry's PRSL restrictions specifically to APEOs, Phthalates, PFCs, SCCPs and CPs?		
2.20	Have you informed Burberry of any non-compliant product, raw material or chemical formulation?		

		<b>Answer (state yes/no)</b>	<b>Can you provide supporting evidence?</b>
<b>3 Implementation – Upstream</b>			
3.1	Have your upstream suppliers appointed a “Chemical Manager” to manage the MRSL implementation?		
3.2	Have your upstream suppliers communicated the MRSL and implementation guidelines internally?		
3.3	Have your upstream suppliers communicated the MRSL requirements to their chemical suppliers?		
3.4	Have your upstream suppliers requested the “Positive List of Chemicals” from their chemical suppliers?		
3.5	Have your upstream suppliers received all chemical supplier’s Positive List?		
3.6	Do your upstream suppliers have a record of their own chemical inventory?		
3.7	Have your upstream suppliers screened their chemical inventory against the Positive Lists received?		
3.8	Have your upstream suppliers identified any non-compliant chemical formulation?		
3.9	Have your upstream suppliers a plan to replace the “non-compliant chemicals” with “compliant chemicals”?		
<b>4 Achievements</b>			
4.1	Can you confidently state that you have eliminated the use of Phthalates in your product and processes specific to Burberry production?		
4.2	Can you confidently state that you have eliminated the use of Alkylphenols in your product and processes specific to Burberry production?		
4.3	Can you confidently state that you have eliminated the use of all PFCs (Long Chain and Short Chain) in your product and processes specific to Burberry production?		
4.4	Can you confidently state that you have eliminated the use of Chlorophenols in your product and processes specific to Burberry production?		
4.5	Can you confidently state that you have eliminated the use of Short Chain Chlorinated Paraffins in your product and processes specific to Burberry production?		