

## Explanatory material regarding “Voluntary Standards on Nonuse of Harmful Substances for Textiles and Clothing”

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## 1. Introduction

In Japan, textile products are regulated under the “Act on Control of Household Products Containing Harmful Substances” not to allow toxic substances to mix into final products. The act is applied to mothproof finishing agents such as dieldrin and formaldehyde (formalin) and others. However, there are some substances that are regulated in EU and China but not regulated in Japan. Textile products and clothes are touched and worn everyday by customers. Thus, their safety is the challenge that must be addressed with top priority and is also a great mission for those who provide textile products.

At present, the Japanese government has also started discussions to keep pace with regulations of foreign countries. But with the aim of having those who provide textile products continue to sincerely live up to customers’ trust beyond their various positions, rather than waiting for legislation, Japan Textile Federation (hereinafter referred to as “JTF”) has developed the “Voluntary Standards on Nonuse of Harmful Substances for Textiles and Clothing” (hereinafter referred to as “Voluntary Standards on Safety”).

We would like to ask many of those who are concerned to understand the purpose of the Voluntary Standards on Safety and to make use of this material in the scenes of their business operations.

### **(1) Substances to be covered by the Voluntary Standards on Safety are selected with reference to the substances regulated in EU where regulations on chemical substances are ahead of Japan.**

In recent years, we have learned to know that azo colorants and azo pigments extracted from human sweat are reduced by the actions of bacteria on skin surfaces and enzymes in human bodies, and may produce substances (specific aromatic amines) that could do harm to human bodies. The substances subject to restricted use this time are those substances that could produce 22 substances of specific aromatic amines, among dyes (dyes and pigments) used in dyeing processes. We select the same substances as those covered by the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) by EU that is ahead of others to prevent harmful substances from mixing into final products.

### **(2) Aim of our efforts**

This efforts are aimed at making it possible to prove that textile products and clothes do not contain substances that are known to be harmful.

As for textile products and clothes sold in Japan, we have tracked down causes of problems and promoted prevention of recurrence whenever safety problems happened. Though we have prevented occurrence of big problems because of the accumulation of such efforts, there has been no reliable system to prevent in advance the use of those substances that are known to be harmful. To create a system for prevention to meet the request of consumers for security and safety, we will try to

make it obligatory not to use specific substances by attaching certificates.

### **(3) Characteristics of our efforts is reliable management of raw materials.**

This efforts for prevention are to reliably manage raw materials themselves (management of dyes in dyeing processes).

Under the Voluntary Standards on Safety, raw materials are managed by attaching “nonuse declaration” or “assay certificate” (any document issued by testing and inspection institutions, which mentions the results of analyses conducted by the prescribed test method regardless of names such as “test report,” “test certificate,” “inspection certificate,” etc. Hereinafter referred to as “assay certificate”) before problems take place. As for the substances to be regulated this time, any substance that causes problems is not used except for dyeing processes. Therefore, the safety of completed raw materials and clothes is ensured by not using any dye (dyes and pigments) that could produce the applicable substances or analyzing products after dyeing and conducting appropriate operation process management in the subsequent processes.

For this purpose, companies clearly express the terms and conditions (nonuse of the applicable substances) on safety of raw materials when they place orders, and both selling companies and purchasing companies of raw materials (those who receive orders and those who place orders) reliably check the safety of raw materials through each process.

## **2. Outline of Voluntary Standards on Safety**

### **(1) Applicable substances**

These azo colorants, from which 22 substances of specific aromatic amines (① Applicable 22 substances of specific aromatic amines on p. 3) are detected in excess of 30 mg/kg from textile products as a result of reductive decomposition of azo groups by the prescribed test method, must not be used.

The method of proving eligibility is the analysis (analysis is not necessary if there are nonuse declarations and others presented by dye manufacturers and dyeing companies) by the prescribed method (② Checking methods (nonuse declaration and prescribed test method) on p. 4).

#### **① Applicable 22 substances of specific aromatic amines**

As for the 22 substances of specific aromatic amines to be addressed under the Voluntary Standards on Safety, we referred to those substances listed as aromatic amines in Oeko-Tex Standard 100 and Eco Mark and made discussions about whether or not to define them as applicable substances. For validation, we researched various evaluation documents and decided to select the same substances as those regulated by REACH as applicable substances. For

consideration of aromatic amines, we referred mainly to the International Agency for Research on Cancer (IARC) and to EU's evaluation as necessary.

Table 1: Applicable specific aromatic amines

No.	Name	CAS No.	IARC's evaluation	No.	Name	CAS No.	IARC's evaluation
1	Biphenyl-4-ylamine	92-67-1	1	12	3,3'-Dimethylbenzidine	119-93-7	2B
2	Benzidine	92-87-5	1	13	4,4'-Methylenedi-o-toluidine	838-88-0	2B
3	4-Chloro-o-toluidine	95-69-2	2A	14	6-Methoxy-m-toluidine	120-71-8	2B
4	2-Naphthylamine	91-59-8	1	15	4,4'-Methylene-bis-(2-chloro-aniline)	101-14-4	1
5	o-Aminoazotoluene	97-56-3	2B	16	4,4'-Oxydianiline	101-80-4	2B
6	5-Nitro-o-toluidine	99-55-8	3	17	4,4'-Thiodianiline	139-65-1	2B
7	4-Chloroaniline	106-47-8	2B	18	o-Toluidine	95-53-4	1
8	4-Methoxy-m-phenylenediamine	615-05-4	2B	19	4-Methyl-m-phenylenediamine	95-80-7	2B
9	4,4'-Diaminodiphenylmethane	101-77-9	2B	20	2,4,5-Trimethylaniline	137-17-7	3
10	3,3'-Dichlorobenzidine	91-94-1	2B	21	o-Anisidine	90-04-0	2B
11	3,3'-Dimethoxybenzidine	119-90-4	2B	22	4-Aminoazobenzene	60-09-3	2B

Classification by the IARC Monographs

Group 1: Carcinogenic to humans

Group 2A: Probably carcinogenic to humans

Group 2B: Possibly carcinogenic to humans

Group 3: Not classifiable as to its carcinogenicity to humans

## ② Checking methods (nonuse declaration and prescribed test method)

- The Voluntary Standards on Safety are aimed at being applied to those azo colorants (dyes and pigments) that could produce 22 substances of specific aromatic amines when tests are conducted by the prescribed method, rather than limiting the use of "aromatic amines" themselves ("specific aromatic amines" are not used as dyes, but it is known that if certain kinds of dyes and pigments are used, then "specific aromatic amines" are reduced and produced).
- Therefore, unless those dyes and pigments that are known to reduce and produce "specific aromatic amines" are used, such amines are never reduced and produced. Precisely, however, there is a possibility remaining that such amines could be reduced and produced from unknown dyes and pigments. In cooperation with manufacturers of dyes and pigments, we have made it obligatory to strictly check that individual dyes and pigments do not produce "specific aromatic amines." If such information is (determined to be) correct, we have adopted a system under the Voluntary Standards on Safety to issue "nonuse declaration" by using only those dyes and pigments that are known not to reduce and produce specific aromatic amines.
- As EN 14362-1: 2003 and EN 14362-2: 2003, which are the test standards of EU, are adopted in the laws and regulations and standards that already exist in foreign countries as the test method to find whether the applicable substances are detected from dyed products or not, we have decided to adopt them also in the Voluntary Standards on Safety.

In the case where this analysis method is adopted, it is known that a small quantity of aromatic amines could be detected in some cases (false positive results) even though aromatic amines are not contained. Both standards mention in their notes that “attention should be paid to the interpretation of the quantity of aromatic amines detected is 30 mg/kg or less.” Although it is reference information, the annex indicates that “the azo colorant that produces aromatic amines is used for certain in the case where the value of quantity detected is more than 30 mg/kg” but “in the case where the value of quantity detected is 30 mg/kg or less, whether such azo colorant is used or not is uncertain unless other information is obtained.” It is recommended to report: “not detected” in the case where the value of quantity detected is 30 mg/kg or less; and “detected level is more than 30 mg/kg” and “it is suggested that the azo colorant which produces aromatic amines is used” in the case where the value of quantity detected is more than 30 mg/kg.

**③ Reference: List of dyes that are known to produce 22 substances of specific aromatic amines**

The dyes that could produce 22 substances of specific aromatic amines are listed below. However, the list does not necessarily cover all of such dyes.

There are more than 6,000 types of dyes and pigments registered on the database of Colour Index, but the azo colorants (dyes and pigments) that could produce 22 substances of specific aromatic amines account for only about 3% of them.

Table 2

Dye name (Name of Colour Index)	CAS No.	Dye name (Name of Colour Index)	CAS No.	Dye name (Name of Colour Index)	CAS No.
Acid Black 29	12217-14-0	Direct Blue 76	16143-79-6	Direct Red 1	2429-84-7
Acid Black 94	6358-80-1	Direct Blue 80		Direct Red 2	992-59-6
Acid Black 131	12219-01-1	Direct Blue 90		Direct Red 7	
Acid Black 132	12219-02-2	Direct Blue 98		Direct Red 10	2429-70-1
Acid Black 209		Direct Blue 100		Direct Red 13	1937-35-5
Acid Brown 415		Direct Blue 151	110735-25-6	Direct Red 17	
Acid Orange 24	1320-07-6	Direct Blue 156		Direct Red 18	
Acid Orange 45	2429-80-3	Direct Blue 160		Direct Red 21	1645-78-9
Acid Red 4	5858-39-9	Direct Blue 173		Direct Red 22	
Acid Red 5		Direct Blue 177		Direct Red 24	
Acid Red 24		Direct Blue 191(S)		Direct Red 26	
Acid Red 26	3761-53-3	Direct Blue 192	159202-76-3	Direct Red 28	573-58-0
Acid Red 73	5413-75-2	Direct Blue 201	60800-55-7	Direct Red 29	
Acid Red 85	3567-65-5	Direct Blue 215	6771-80-8	Direct Red 33	
Acid Red 114	6459-94-5	Direct Blue 218		Direct Red 37	3530-19-6
Acid Red 115		Direct Blue 224		Direct Red 39	6358-29-8
Acid Red 116		Direct Blue 230		Direct Red 42	
Acid Red 128	6548-30-7	Direct Blue 295	6420-22-0	Direct Red 43	
Acid Red 148		Direct Brown 1	3811-71-0	Direct Red 44	6548-29-4
Acid Red 150		Direct Brown 1:2	2586-58-5	Direct Red 46	2302-97-8
Acid Red 158	8004-55-5	Direct Brown 2	2429-82-5	Direct Red 52	

Dye name (Name of Colour Index)	CAS No.	Dye name (Name of Colour Index)	CAS No.	Dye name (Name of Colour Index)	CAS No.
Acid Red 167		Direct Brown 6	2893-80-3	Direct Red 59	
Acid Red 264		Direct Brown 25	33363-87-0	Direct Red 60	
Acid Red 265	6358-43-6	Direct Brown 27	6360-29-8	Direct Red 62	
Acid Red 323		Direct Brown 31	2429-81-4	Direct Red 67	
Acid Red 420		Direct Brown 33		Direct Red 72	8005-64-9
Acid Violet 12	6625-46-3	Direct Brown 51		Direct Red 74	
Basic Brown 2		Direct Brown 56		Direct Red 88	
Basic Brown 4	5421-66-9	Direct Brown 58		Direct Violet 1	2586-60-9
Basic Orange 1		Direct Brown 59	6247-51-4	Direct Violet 3	
Basic Red 42		Direct Brown 60		Direct Violet 4	
Basic Red 111	113741-92-7	Direct Brown 74	8014-91-3	Direct Violet 9	
Direct Black 4	2429-83-6	Direct Brown 79	6483-77-8	Direct Violet 12	2429-75-6
Direct Black 9		Direct Brown 86		Direct Violet 17	
Direct Black 15		Direct Brown 95	16071-86-6	Direct Violet 21	
Direct Black 29		Direct Brown 101		Direct Violet 22	6426-67-1
Direct Black 38	1937-37-7	Direct Brown 111		Direct Violet 27	
Direct Black 91	6739-62-4	Direct Brown 154	6360-54-9	Direct Violet 36	
Direct Black 114		Direct Brown 165		Direct Violet 38	
Direct Black 154	54804-85-2	Direct Brown 200		Direct Violet 42	
Direct Blue 1	3814-14-3	Direct Brown 222		Direct Violet 43	
Direct Blue 2	2429-73-4	Direct Brown 230		Direct Violet 45	
Direct Blue 3		Direct Green 1	3626-28-6	Direct Violet 85	
Direct Blue 6	2602-46-2	Direct Green 6	4335-09-5	Direct Violet 88	
Direct Blue 8	2429-71-2	Direct Green 8	5422-17-3	Direct Yellow 1	
Direct Blue 9		Direct Green 8:1		Direct Yellow 20	6426-62-6
Direct Blue 10	4198-19-0	Direct Green 21:2		Direct Yellow 24	6486-29-9
Direct Blue 14	72-57-1	Direct Green 60		Direct Yellow 48	
Direct Blue 15	2429-74-5	Direct Green 85	72390-60-4	Direct Yellow 68	
Direct Blue 16		Direct Orange 1	6459-87-6	Direct Yellow 95	
Direct Blue 19		Direct Orange 2		Disperse Orange 149	85136-74-9
Direct Blue 22	2586-57-4	Direct Orange 6	6637-88-3	Disperse Red 151	
Direct Blue 25	25180-27-2	Direct Orange 7	2868-76-0	Disperse Yellow 7	6300-37-4
Direct Blue 26		Direct Orange 8	2429-79-0	Disperse Yellow 23	6250-22-3
Direct Blue 35		Direct Orange 10	6405-94-3	Disperse Yellow 56	54077-16-6
Direct Blue 48		Direct Orange 25		Solvent Orange 7	3118-98-6
Direct Blue 49		Direct Orange 33		Solvent Red 19	6368-72-5
Direct Blue 53	314-13-6	Direct Orange 72		Solvent Red 23	85-86-9
Direct Blue 58		Direct Orange 101			
Direct Blue 64		Direct Orange 108			

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## (2) Applicable products

### ① Primary applicable products to be addressed with higher priority

As the prioritized scope of application for textile products and clothes, the Voluntary Standards on Safety are applied to “Classification Code 78: Clothing (excluding footwear and personal effects),” “Classification Code 79: Personal Effects” and “Classification Code 82: Textile Products for Household Use” among the products listed on the Standard Commodity Classification for Japan.

However, some products for non-clothing applications are excluded (those products listed on Application Codes 793, 795-798, 821, 823-826 and 828 are not applicable).

(Reference: Standard Commodity Classification for Japan, Retrieval System (General Contact for Government Statistics))

<http://www.e-stat.go.jp/SG1/htoukeib/TopDisp.do;jsessionid=53pvKbhQBSJh15VkLyCh50vGHMTlp26yxhSwLTXbvtTV1ZGpvFk2!-680659475!-2122447549?bKind=03>

## ② Secondary applicable products to be addressed in the future

The products that are excluded above are defined as the secondary applicable products. The timing when the voluntary standards are applied to them will be separately discussed.

Table 3-1: Applicable items at this time based on list of Standard Commodity Classification for Japan

8	Housewares and cultural goods	
78	Clothing (excluding footwear and personal effects)	
		Excluding leather clothes
781	Outer garment	Suit, dress, coat, jumper, jacket, sweater, cardigan, shirt, trousers, skirt, etc.
		Dress shirt, blouse, polo shirt, T-shirt, sweat shirt, sportswear, etc.
782	Underwear	
783	Nightwear (excluding Japanese style nightwear)	
784	Japanese clothing	Juban (underwear for traditional Japanese clothing), nagagi (kimono)
		Haori (coat for traditional Japanese clothing), hakama (traditional Japanese skirt-like pants), obi (sash for traditional Japanese clothing), etc.
785	Socks	
786	Tabi (traditional Japanese socks)	
787	Hat	
788	Gloves (excluding gloves made of rubber)	
789	Other clothing (excluding footwear and personal effects)	Clothing not classified into other categories Excluding furs
79	Personal effects	
791	Handkerchief	
792	Collar (excluding fur collar)	Tie, shawl, etc.
		Muffler, scarf, etc.
794	Personal effects for Japanese clothes Obidome (ornament for obi (sash for traditional Japanese clothing)), haneri (a piece of collar sewn on juban (underwear for traditional Japanese clothing)), susoyoke (a kind of underwear for traditional Japanese clothing), furoshiki (traditional Japanese wrapping cloth), etc.	

	799	Other personal effects	Diaper, baby pants, bib, apron, leggings, etc.
82 Textile products for household use			
	822	Bedclothes	Quilt cover, sheet, blanket, pillowcase, etc.
	827	Towel, bath mat and related products	
	829	Other textile products for household use	Kitchen cloth

Table 3-2: Items to be examined in the future based on list of Standard Commodity Classification for Japan

8	Housewares and cultural goods		
78	Clothing (excluding footwear and personal effects)		
79	Personal effects		
	793	Suspenders, garters, arm band, belt for clothes, buckle, collar and cuff	
	795	Bags Handbag, accessory pouch (billfold, gamaguchi (Japanese style pouch), business card folder, etc.), fashionable bag, etc.	
	796	Bag	
	797	Umbrella and stick	
	798	Folding fan and round fan	
82 Textile products for household use			
	821	Floor mat	Excluding tatami mat and tile
	823	Quilt for kotatsu (low table with a heater inside), zabuton (floor cushion) and cushion	
	824	Curtain and veil	
	825	Tablecloth, napkin and related products	
	826	Upholstery and zabuton cover	
	828	Mosquito net	

### 3. Measures for compliance with Voluntary Standards on Safety

The Voluntary Standards on Safety has unique characteristics that makes it possible to use “nonuse declaration” at a dyehouse, even though “assay certificate” of test and analysis is not necessarily attached. Under the Voluntary Standards on Safety, proper conformity of either “assay certificate” or “nonuse declaration” with textile products endorses the effectiveness to guarantee certification.

Efforts are made by each of the companies to create the basis to further increase safety by checking the conformity with the standards with “nonuse declaration” or “assay certificate” of applicable substances in each stage of supply chain.

#### (1) Method to enable guarantee (method of certification)

##### ① Nonuse declaration by each dyehouse

The use of azo colorants that could produce 22 substances of specific aromatic amines can be limited to dyeing processes. Therefore, dyeing companies have to select on their own the method of either (a) nonuse

declaration of each dyehouse or (b) analysis by the prescribed test method, and prove that they comply with the Voluntary Standards on Safety. If fabric companies, apparel companies and retailers cannot obtain (a) “nonuse declaration” of each dyehouse or (b) “assay certificate” of analysis by the prescribed test method from dyehouses, such midstream or downstream companies have to conduct on their own (b) the analyses by the prescribed test method concerning applicable textile products.

Specifically, dyeing companies are required to promote satisfaction of the requirements for dyes held in their dyehouses (elimination of dyes and pigments that have the possibility of producing the applicable substances) by “obtaining information from dye and pigment manufacturers.”

For individual raw materials for dyes, certification in lot unit is required. But there are various problems in individual records and their storage on-site. Since the intended purpose is achieved if it is guaranteed that the substances subject to the nonuse requirement are not used for dyeing, they are required to start with the declaration of “each dyehouse” that conducts dyeing. Moreover, we decided to use “nonuse declaration” of “each dyehouse” in introducing the Voluntary Standards on Safety because it is effective to reduce paperwork by means of comprehensive certification.

## **② Reliable management of raw materials by all companies involved**

The “Voluntary Standards on Safety” of JTF are designed to select appropriate dyes and pigments in dyeing processes and promote nonuse of inappropriate dyes and pigments. However, the Voluntary Standards on Safety are not aimed at having only dyeing companies share the loads of new operations. They are aimed at making it possible to certify the safety of each raw material until it is delivered to the hand of end user by having all companies in the supply chain of textile products tie the “certificate” of safety properly with the raw material. Therefore, all of the companies involved assume their fair share of loads, and the safety of textile products can be pursued by their cooperation.

As they are the Voluntary Standards on Safety, so-called penalties are not specified. Problems and troubles, if any, are required to be solved in individual deals. As the number of companies that sincerely fulfill their responsibility increases, they will be left to the “choice of market.”

Specifically, all of the companies involved are required to select those dyeing companies that have declared nonuse of harmful substances in such processes as dyeing and printing of each raw material, and manage raw materials by tying each raw material with the information about by which dyeing company the raw material was processed. Under the mechanism, those companies that do not directly place an order for dyeing services are also required to receive the information on every raw material for purchase and sale from such dyeing company, store the information in-house, and provide the information when the raw material is sold, and thereby the nonuse declaration can be guaranteed.

In the following cases, dyes, pigments and textile products have to be analyzed by the prescribed test method:

- (i) In the case where the information about conformity (elimination of dyes and pigments that could produce the applicable substances) of dyes and pigments used by dyehouses cannot be obtained from dye and pigment manufacturers, dyeing companies have to analyze the dyes and pigments that they use on their own by using the prescribed test method.
- (ii) If the “nonuse declaration” or “assay certificate” for dyes and pigments that could produce the applicable substances cannot be obtained from dyeing companies when fabric companies, apparel companies and retailers purchase raw materials, such fabric companies, apparel companies and retailers have to analyze their textile products on their own by using the prescribed test method.

## **(2) Measures to guarantee nonuse declaration**

The effectiveness of “nonuse declaration” or “assay certificate” can be guaranteed only by tying them to respective dyed raw materials. To ensure the guarantee, the following ideas and documents are introduced and utilized:

### **① “Trade contract”**

This serves as the evidence that those who place orders and those who receive orders agreed in advance on their roles and arrangements to be made in the case of breach of contract.

The contents of measures to guarantee safety, in which the “nonuse declaration” system or the “assay certificate” system is incorporated, are checked in advance by the trade contract between the parties concerned by making use of the contract assets that already exist or JTF’s “Quality Guidelines for Imported Textile Products.”

It is strongly recommended that such agreement should be made in advance because as long as the both parties adopt the “Voluntary Standards on Safety,” the trade contract is the evidence that the both parties agreed to “fulfill their duties of a good manager” to sincerely observe the Voluntary Standards on Safety.

### **② “Procurement Standard Statement”**

It is strongly recommended that the requirements of those who place orders as agreed in a “trade contract” should be clearly stated and provided for as the stocking and procurement standards for those who place orders. Such requirements may be presented at the time of every trade when orders are placed. But presentation of such requirements may be omitted, if they are explained to the other party as the procurement standards for those who place orders. The

request for nonuse of applicable substances (dyes and pigments) includes the contents of the “Voluntary Standards on Safety.”

The procurement standards make a pair of “nonuse declaration” or “assay certificate,” which is presented by those who receive orders to those who place orders. The standards are composed of (a) the applicable substances prescribed by the “Voluntary Standards on Safety,” and (b) requests to those who receive orders to make the certificate effective. Particularly, (b) has to be clearly presented in advance because it is required for those who receive orders to share the relevant information of “nonuse declaration.”

### ③ “Nonuse declaration” or “assay certificate” on applicable substances

These documents declare nonuse of the applicable substances at each dyehouse of dyeing companies.

The grounds for nonuse at dyeing companies serve as the information about non-production of the applicable substances for dye and pigment manufacturers.

The documents declare nonuse of each raw material and make a pair of clear statement (presentation) of the “Procurement Standard Statement” mentioned in ② above.

Intermediary companies are allowed to issue documents that certify nonuse at dyehouses on the condition of appropriate checking by suppliers (those who receive orders) and checking and acceptance by customers (those who place orders with intermediary companies), even in the case where such intermediary companies do not directly place orders with and check dyehouses on their own.

The documents declare nonuse of each raw material. In the case where they include “nonuse declaration” of multiple raw materials, such inclusive “nonuse declaration” can be used instead of individual “nonuse declaration.”

Of course, it is also possible to present copies of “nonuse declaration” of dyehouses, which are obtained from those who place orders, instead of “nonuse declaration” to be issued by intermediary companies.

### ④ “Sharing of information between both parties of contract”

The acceptance of “nonuse declaration” on raw materials from dyeing companies is the start of chain of certificates. Those companies who purchase raw materials with certificates issued by the dyeing companies are required to provide the information held by them also to their customers and share the information when they sell the raw materials, and thereby the effectiveness of guarantee of certificates can be maintained. At the same time, it should be noted that proper in-house management of ties between raw materials and certificates by the companies concerned can be the grounds to guarantee the certificates themselves.

When the information provided at the time of trade between companies is

checked, a prior agreement between those who place orders (purchase) and those who receive orders (deliver) is required.

**Additional operations and standard statement (procurement standard) from those who place orders and declaration (nonuse declaration) presented by those who receive orders**

