

# PRODUCT RESTRICTED SUBSTANCES LIST (PRSL)

C & J Clark International Limited, 40 High Street, Street, Somerset, England, BA16 0EQ



Clarks operates a robust chemicals management programme for our products and has a well-established Product Restricted Substances Policy (Containing the PRSL) which both restricts and sets limits for the types of chemical substances that may be contained within our finished products.

Our PRSL is based on stringent requirements from across our global markets, including REACH, CPSIA and California Proposition 65. The policy is applicable to all products that are branded Clarks\*. Our PRSL is reviewed annually in line with global regulatory updates as well as to ensure that it represents the most relevant substances for our products.

We implement our PRSL via a test programme with extensive testing of our products, materials and components, through an approved global network of recognised third-party laboratories. Clarks is committed to responsible chemicals management and will continue to research, monitor and educate our supply chain in all aspects related to our PRSL.

The PRSL below provides an overview of the following:

- Substance names: Which are prohibited or restricted and how they are commonly referred to.
- CAS numbers: A globally recognised (number reference) registry of unique chemicals substances.
- Material classifications (e.g., leather): The material categories in which substances are most likely to occur.
- Test methods: The most currently recognised test method that is used to analyse for substances.
- Limits: The current Clarks policy limits for the relevant substances.

Definitions:

- CPSIA – Consumer Product and Safety Improvement Act (US): Signed into US law in August 2008 it imposes requirements for consumer products imported into the US, particularly those intended for children.
- The California Safe Drinking Water and Toxic Reinforcement Act 1986: Commonly referred to as “Proposition 65,” is a product safety law which applies to all consumer products distributed within the state of California
- None-Detectable: The substance is not able to be detected above the recognised detection limit of the test method.
- Parts per million (ppm): This is a common unit used to state low concentration levels of substances, for example 1000ppm is equal to 0.1%.
- REACH (Registration, Evaluation, and Authorisation of Chemicals) regulation (EU) no.1907/2006: Came into force in June 2007, it aims to improve the protection of human health and the environment from the risks of chemicals and to maintain the competitiveness of EU industry.

\* Products distributed in Australia are done so through a licensed partner who manage and control a separate Restricted Substances policy.

For queries regarding the PRSL please contact [csr@clarks.com](mailto:csr@clarks.com)

Restricted Substance												Method (or equivalent)	Clarks Limit
	1. Leather	2. Textiles (Natural)	3. Textiles (Synthetic)	4. Cellulose	5. Rubber	6. Plastic	7. Adhesive	8. Metal	9. Paint	10. Electrical	11. Packaging		
Azo Dyes	◆	◆	◆									BS EN ISO 17234-1/2:2020/11 (Leather) BS EN ISO 14362-1/3: 2017 (Textiles) GB/T 17592 / GB/T 23344 / GB/T 19942 / GB/T 33392 (China standard)	Textiles; 20ppm All other materials; 30ppm
Chloroalkanes (C10-C13) and (C14-C17)	◆				◆	◆						BS EN ISO 18219-1:2021 (Leather) BS EN ISO 18219-2:2021 (Leather) BS EN ISO 22818:2021 (Textiles)	1000ppm (0.10%) sum of C10-C13 1000ppm (0.10%) sum of C14-C17
Chrome VI	◆	◆	◆									BS EN ISO 17075-1:2017 (Leather) BS EN ISO 17075-2:2017 (Preferred) (Leather) BS EN ISO 10195:2021 A2 (Pre-aging, not required unless otherwise stated) (Leather) BS EN 16711-2:2015 (Textiles)	Textiles: 1ppm Leather: 3ppm
DMFu	◆	◆	◆	◆	◆	◆			◆		◆	BS EN 17130:2019 (Textiles) ISO 16186:2021	None-detectable (detection limit: 0.1ppm)
Disperse Dyes, as specified in Restricted Substances Register, Chemical 5			◆									DIN 54231:2022 (Preferred) BS EN ISO 16373-2:2014 (Textiles)	None-detectable (detection limit: 15ppm)
Formaldehyde	◆	◆	◆	◆			◆					BS EN ISO 17226-1:2021 (HPLC) (Leather) BS EN ISO 14184-1:2011 (Textile) ISO 27587:2009 (Formulations)	Leather: Infants/Children, 20ppm Textile: Infants/Children, 16ppm All other: 75ppm
Heavy Metals (Extractable Content)		◆	◆									BS EN 16711-2:2015	As, Cd, CrVI & Pb: 1ppm individually
Heavy Metals (Total Content)	◆	◆	◆	◆	◆	◆		◆	◆	◆	◆	BS EN ISO 17072-2:2022 or as specified by U.S.CPSIA BS EN 16711-1:2015 (Textiles)	Hg: 0.5ppm, Cd: 40ppm, As: 90ppm, Pb: 90ppm
Nickel								◆				BS EN 12472:2020 (Pre-treatment) BS EN 1811:2023 (Migratable)	0.5µg /cm <sup>2</sup> /wk
Nitrosamines					◆							BS EN ISO 19577:2019	None-detectable (detection limit: 0.1ppm)
Nonylphenols, Octylphenols and their Ethoxylates (NP, NPEO, OP, OPEO): Alkylphenol & Alkylphenol Ethoxylates	◆	◆	◆									BS EN ISO 18218-2:2019 (Leather) BS EN ISO 21084:2019 (Textile) BS EN ISO 18218-1:2023 (Leather) NPEO/OPEO only BS EN ISO 18254-1:2016 (Textile) NPEO/OPEO only	100ppm If NPEO/OPEO is 'none detected' in BS EN ISO 18218-1:2023 or BS EN ISO 18254- 1:2016 then NP/OP not present either
Organotins: TBT, TPhT, TCyT, TOT, TPT, TMT, DBT, DOT, TBTO, MBT and DBTC	◆	◆	◆	◆	◆	◆			◆	◆		BS EN ISO 22744-1:2020 (Textiles) CEN ISO/TS 16179:2012	0.5 ppm per Organotin type (TBT & TPhT only) 1ppm per other Organotins types
Pesticides, as specified in Restricted Substance Register, chemical 13	◆	◆										Extraction by organic solvent, EPA 8081	1ppm Total

Restricted Substance												Method (or equivalent)	Clarks Limit
	1. Leather	2. Textiles (Natural)	3. Textiles (Synthetic)	4. Cellulose	5. Rubber	6. Plastic	7. Adhesive	8. Metal	9. Paint	10. Electrical	11. Packaging		
Perfluorinated and Polyfluorinated Alkyl Substances	◆	◆	◆						◆		◆	PD CEN/TS 15968:2010 (Textiles) BS EN ISO 23702-1:2023 (Leather) EN 17681-1/2:2022 (Textile) Combustion Ion Chromatography	PFOA and its salts: <0.025ppm (each) PFOA and related substances: <1.0ppm (sum) PFOS and related substances: <1ug/m <sup>2</sup> of the coated material or 0.025ppm PFHxS and its salts: <0.025ppm (each) PFHxS-related compounds <1ppm C9-C14 PFCAs, their salts: <0.025ppm (sum) C9-C14 PFCA- related substances <0.26ppm (sum) Total Organic Fluorine <100ppm
Phenols (Chlorinated) PCP, TeCP	◆	◆	◆									BS EN ISO 17070:2015 (leather) DIN EN 17134-2:2023 (textiles)	All materials: 0.5ppm
Phthalates (DEHP, DBP, BBP, DINP, DIDP, DNOP, DIBP, DnHP, DHNUP, DIHP, DHP, DMEP, DIPP, NPiPP, DPP, DCHP, DMP, DEP, 1,2-Benzenedicarboxylic acid, dipentylester, branched and linear, 1,2-Benzenedicarboxylic acid, di-C6-10-alkyl esters and Diisohexyl phthalate)	◆ *1		◆		◆	◆	◆		◆	◆ *3	◆	BS EN ISO 14389:2022 (Textiles) CPSC-CH-C1001-09.4 (American standard)	1000ppm total (combined phthalates)
PAH			◆		◆ *4	◆ *4						EN 17132:2019 (Textiles) EN ISO 16190:2021 (Footwear) AfPS GS 2019:01 / GC-MS (Other)	1ppm by weight of component for REACH listed PAH (textile (synthetic), rubber & plastic - skin contact materials only)
Carcinogenic, mutagenic, or toxic for reproduction substances (CMR's)		◆	◆			◆ *2						GCMS Headspace or equivalent. BS EN ISO 16189:2021 (modified) / BS EN ISO 19070:2016 (modified) or equivalent. BS EN ISO 14362:2017 / DIN 54231:2022 (modified) or equivalent. BS EN 17137:2018 (modified) – or equivalent.	Benzene: 5ppm Solvents in polymer coatings: 1000ppm Intermediary dyestuffs: 20ppm (Quinoline 50ppm) Chlorinated toluenes: 1ppm

**Notes:**

A. If testing whole shoes, a compromise on test costs is accepted by testing visible componentry only (including linings).

B. If failures are found from composite testing, further testing should be conducted as necessary to identify if there is a failure from a single material or component.

\*1 Patent/Coated leather only.

\*2 Applicable to polymer coatings used in textile production only.

\*3 Reference Phthalates as per ROHS directive: EU 2011/65 (currently DBP/DIBP/BBP/DEHP).

\*4 Applicable to materials in skin contact only.

## Appendix 1 - Azo Dyes

Chemical	CAS no
4 - Aminobiphenyl	92-67-1
Benzidine	92-87-5
4 - Chlorotoluidine	95-69-2
2 - Naphthylamine	91-59-8
o - Aminoazotoluene	97-56-3
2 - Amino-4-nitrotoluene	99-55-8
4 - Chloroaniline	106-47-8
2,4 - Diaminoanisole	615-05-4
4,4'- Diaminodiphenylmethane	101-77-9
3,3'- Dichlorobenzidine	91-94-1
3,3'- Dimethoxybenzidine	119-90-4
3,3'- Dimethylbenzidine	119-93-7
3,3'-Dimethyl-4,4'-diaminodiphenylmethane	838-88-0
4 - Cresidine	120-71-8
4,4'-methylenebis-(2-chloroaniline)	101-14-4
4,4'-Oxydianiline	101-80-4
4,4'-Thiodianiline	139-65-1
2 - Toluidine	95-53-4
2,4 - Diaminotoluene	95-80-7
2,4,5 - Trimethylaniline	137-17-7
2 - Aminoanisole	90-04-0
4 - Amino azobenzene	60-09-3
2,4 - Xylidine	95-68-1
2,6 - Xylidine	87-62-7

## Appendix 2 - Disperse Dyes

Chemical	CAS no
Disperse Blue 1 *	2475-45-8
Disperse Blue 3	2475-46-9
Disperse Blue 7	3179-90-6
Disperse Blue 26	3860-63-7
Disperse Blue 35	12222-75-2
Disperse Blue 102	69766-76-6
Disperse Blue 106	12223-01-7
Disperse Blue 124	61951-51-7
Disperse Brown 1	23355-64-8
Disperse Orange 1	2581-69-3
Disperse Orange 3	730-40-5
Disperse Orange 11	82-28-0
Disperse Orange 37	12223-33-5
Disperse Orange 76	13301-61-6
Disperse Orange 59	51811-42-8
Disperse Orange 149	85136-74-9
Disperse Red 1	2872-52-8
Disperse Red 11	2872-48-2
Disperse Red 17	3179-89-3
Disperse Yellow 1	119-15-3
Disperse Yellow 3	2832-40-8
Disperse Yellow 9	6373-73-5
Disperse Yellow 23	6250-23-3
Disperse Yellow 39	12236-29-2
Disperse Yellow 49	54824-37-2
	6858-49-7
Acid Red 26	3761-53-3
Basic Red 9 *	569-61-9
	569-64-2
Basic Green 4	2437-29-8
	10309-95-2
Basic Violet 3 *	548-62-9
Basic Violet 14	632-99-5
Basic Blue 26	2580-56-5
Direct Black 38	1937-37-7
Direct Blue 6	2602-46-2
Direct Red 28	573-58-0
Direct Brown 95	16071-86-6

Chemical	CAS no.
4-Dimethylaminoazobenzene (Solvent Yellow 2)	60-11-7
Acid Red 114	6459-94-5
Direct Blue 15	2429-74-5
Navy Blue	118685-33-9
Direct Yellow 1	6472-91-9
Pigment Black 25 **	68186-89-0
Pigment Yellow 34 **	1344-37-2
Pigment Red 104 **	12656-85-8

### Appendix 3 – Heavy Metals (Extractable)

Chemical	CAS no
Arsenic (As)	7440-38-2
Cadmium (Cd)	7440-43-9
Chrome VI (CrVI)	18540-29-9
Lead (Pb)	7439-92-1

### Appendix 4 - Nitrosamines

Chemical	CAS no
N-nitrosodimethylamine (NDMA)	62-75-9
N-nitrosodiethylamine (NDEA)	55-18-5
N-nitrosodipropylamine (NDPA)	621-64-7
N-nitrosodibutylamine (NDBA)	924-16-3
N-nitrosopiperidine (NPIP)	100-75-4
N-nitrosopyrrolidine (NPYR)	930-55-2
N-nitrosomorpholine (NMOR)	59-89-2
N-nitroso N-methyl N-phenylamine (NMPHA)	614-00-6
N-nitroso N-ethyl N-phenylamine (NEPHA)	612-64-6

### Appendix 5

#### Nonylphenols, Octylphenols and their Ethoxylates

Chemical	CAS no
Nonylphenol (NP), mixed isomers	104-40-5, 11066-49-2, 25154-52-3, 84852-15-3
Octylphenol (OP), mixed isomers	140-66-9, 1806-26-4, 27193-28-8
Octylphenol Ethoxylates (OPEOs)	9002-93-1, 9036-19-5, 68987-90-6
Nonylphenol Ethoxylates (NPEOs)	9016-45-9, 26027-38-3, 37205-87-1, 68412-54-4, 127087-87-0

### Appendix 6 - Organotins

Chemical	CAS no.
Dibutyltin (DBT)	Various
Diocetyl tin (DOT)	Various
Tributyltin (TBT)	Various
Triphenyltin (TPhT)	Various
Tricyclohexyltin (TCyT)	Various
Triocetyl tin (TOT)	Various
Tripopyl tin (TPT)	Various
Trimethyltin (TMT)	Various
Bis(tributyl)tin (TBTO)	56-35-9
Monobutyltin (MBT)	78763-54-9
Dibutyltin Dichloride (DBTC)	683-18-1

Appendix 7 - Pesticides

Pesticide	CAS no.
2-(2,4,5-trichlorophenoxy) propionic acid, its salts and compounds	93-72-1
2,4,5-T	93-76-5
Aldrine	309-00-2
Azinophosmethyl	86-50-0
Azinophosethyl	2642-71-9
Bromophos-ethyl	4824-78-6
Captafol	2425-06-1
Carbaryl	63-25-2
Chlordane	57-74-9
Chlordimeform	6164-98-3
Chlorfenvinphos	470-90-6
Cyfluthrin	68359-37-5
Cyhalothrin	91465-08-6
Cypermethrin	52315-07-8
Deltamethrin	52918-63-5
DDD	53-19-0
	72-54-8
DDE	3424-82-6
	72-55-9
DDT	50-29-3
	789-02-6
Diazinone	333-41-5
Dicofol	115-32-2
Dicrotophos	141-66-2
Dieldrine	60-57-1
Dimethoate	60-51-5
Dinoseb, its salts and acetate	88-85-7
Endosulfan	115-29-7
Endosulfan I (alpha)	959-98-8
Endosulfan II (beta)	33213-65-9
Endrine	72-20-8
Ethylparathione	56-38-2
Fenvalerate	51630-58-1
Halogenated biphenyls, including Polychlorinatedbiphenyl (PCB)	1336-36-3
	53469-21-9
Halogenated terphenols, including polychlorinated terphenyl (PCT)	Various
Halogenated naphthalenes, including polychlorinated naphthalenes (PCNs)	Various

Pesticide	CAS no.
Halogenated diarylalkanes	Various
Halogenated diphenyl methanes, including Monomethyl-dibromo-diphenyl methane, Monomethyl-dichloro-diphenyl methane, and Monomethyl-tetrachloro-diphenyl methane	99688-47-8
	81161-70-8
Heptachlor	76-44-8
	1024-57-3
Heptachloroepoxide	1024-57-3
Hexabromobiphenyl	36355-01-8
a-Hexachlorocyclohexane with and without Lindane	319-84-6
b-Hexachlorocyclohexane with and without Lindane	319-85-7
g-Hexachlorocyclohexane with and without Lindane	319-96-8
Hexachlorobenzene	118-74-1
Isodrine	465-73-6
Kelevane	4234-79-1
Kepone	143-50-0
Lindane	58-89-9
Malathione	121-75-5
MCPA	94-74-6
MCPB	94-81-5
Mecoprop	93-65-2
Methoxychlor	72-43-5
Mirex	2385-85-5
Monocrotophos	6923-22-4
Parathion-methyl	298-00-0
Pentabromobenzene	608-90-2
Phosdrin/Mevinphos	7786-34-7
Perthane	72-56-0
Propethamphos	31218-83-4
Quinalphos	13593-03-8
Quintozene	82-68-8
Strobane	8001-50-1
Telodrine	297-78-9
Toxaphene	8001-35-2
Trifluraline	1582-09-8

## Appendix 8 - Phthalates

Phthalates	CAS no.
Di (2-ethyl hexyl) phthalate (DEHP)	117-81-7
Dibutyl phthalate (DBP)	84-74-2
Benzyl butyl phthalate (BBP)	85-68-7
Di-isononyl phthalate (DINP)	28553-12-0 68515-48-0
Di-isodecyl phthalate (DIDP)	26761-40-0 68515-49-1
Di-n-octyl phthalate (DNOP)	117-84-0
Di-isobutyl phthalate (DIBP)	84-69-5
Di-n-hexyl phthalate (DnHP)	84-75-3
1,2-Benzenedicarboxylic acid, di-C7-11 branched and linear alkyl esters (DHNUP)	68515-42-4
1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich (DIHP)	71888-89-6
Bis(2-methoxyethyl) phthalate (DMEP)	117-82-8
Diisopentylphthalate (DIPP)	605-50-5
N-pentyl-isopentylphthalate (NPiPP)	776297-69-9
Dipentyl phthalate (DPP)	131-18-0
1,2-Benzenedicarboxylic acid, dipentylester, branched and linear	84777-06-0
1,2-Benzenedicarboxylic acid, dihexylester, branched and linear (DHP)	68515-50-4
1,2-Benzenedicarboxylic acid, di-C6-10-alkyl esters	68515-51-5
Dicyclohexyl phthalate (DCHP)	84-61-7
Diisohexyl Phthalate	71850-09-4
Diethyl phthalate (DEP)	84-66-2
Dimethyl phthalate (DMP)	131-11-3

## Appendix 9 - Polycyclic Aromatic Hydrocarbons

Polycyclic Aromatic Hydrocarbons	CAS no.
Benzo[a]pyrene (BaP)	50-32-8
Benzo[e]pyrene (BeP)	192-97-2
Benzo[a]anthracene (BaA)	56-55-3
Chrysene (CHR)	218-01-9
Benzo[b]fluoranthene (BbFA)	205-99-2
Benzo[j]fluoranthene (BjFA)	205-82-3
Benzo[k]fluoranthene (BkFA)	207-08-9
Dibenzo[a,h]anthracene (DBAhA)	53-70-3
Benzo(g,h,i)perylene	191-24-2
Indeno(1,2,3-c,d)pyrene	193-39-5
Phenanthrene	85-01-8
Pyrene	129-00-0
Anthracene	120-12-7
Fluoranthene	206-44-0
Naphthalene	91-20-3

## Appendix 10 - CMR's (not covered in other areas)

Chemical	CAS no.
Benzene	71-43-2
Solvents in polymer coatings: N-methyl-2-pyrrolidone; 1-methyl-2-pyrrolidone (NMP) N,N-dimethylacetamide (DMAC) N,N-dimethylformamide; dimethylformamide (DMF)	872-50-4 127-19-5 68-12-2
Intermediary dyestuffs: 4-chloro-o-toluidinium chloride 2-Naphthylammoniumacetate 4-methoxy-m-phenylene diammonium sulphate; 2,4-diaminoanisole sulphate 2,4,5-trimethylaniline hydrochloride Quinoline	3165-93-3 553-00-4 39156-41-7 21436-97-5 91-22-5
Chlorinated toluenes: a, a,a,4-tetrachlorotoluene; p-chloro benzotrithloride a, a,a-trichlorotoluene; benzotrithloride a-chlorotoluene; benzyl chloride	5216-25-1 98-07-7 100-44-7