



ICT



23 May 2014

RESPONSE TO ECHA ARTICLE: CHROMIUM-FREE LEATHER

Sir/Madam,

Leather Industry comments on “Chromium-free leather is good for business, consumers and the environment”, p. 4 & 5, ECHA Newsletter, Substitution & Innovation, No. 2, April 2014.

(http://newsletter.echa.europa.eu/documents/6362380/20590848/newsletter_2014_issue_2_april_en.pdf)

The article “Chromium-free leather is good for business, consumers and the environment” has been reviewed by many members of the leather industry. It is our understanding, that several statements are misleading, not scientifically accurate and an organization like ECHA should revise this communication.

In the article it is written that a Danish study found that “almost half of imported leather shoes and sandals contained chromium VI” without clarifying that the total sample size was only 60 pairs of shoes and only 8 of 18 pairs selected for migration analysis exceeded the 3 ppm limit. As such, the study is not statistically robust - a point which the authors acknowledge - and while we cannot deny that it highlights a potential problem, the broad brush depiction of half of all leather shoes as containing Chromium VI is, on the weight of the available evidence, invalid and unnecessarily alarmist. The industry acknowledge a level of 3 ppm despite from a toxicological standpoint, as well as from a hypersensitivity standpoint, a real consumer risk is by far below any reasonable scenario.

(http://www.iultcs.org/pdf/IUR-1_Chromium%20and%20leather%20research_A%20balanced%20view%20of%20facts_Aug-2013_corr.pdf)

Statistics in certified test institutes, which do more than 15.000 Cr (VI) shoe upper leather tests randomly per year, do show that there is still a certain percentage of 5-10 % leather samples, which contains more than 3 ppm Cr (VI).

However the majority of this is still below 10 ppm, and only slightly above this extreme low 3 ppm value. If 95 % of shoe upper leather is reliably produced being in line with the new specification of 3 ppm Cr (VI), it means, it is possible, and the industry needs to make sure, that these state-of-the-art process conditions are put into place globally.

The article also refers to Incusa taking “the opportunity to eliminate the discharge of toxic chromium residues into waste water” which suggests that chrome tanning is synonymous with toxic effluents. Chromium III is not toxic, if it comes into waste water in small amounts, it will be fixed soon or later as Cr₂O₃ and not available anymore for any oxidation to Cr (VI). It is well-known, that chromium in general can be easily separated in a waste water treatment plant. Remaining extremely small traces of Cr (III) ions in the final effluent are in a range of natural occurrences; in many areas around the world the natural given amount of Cr (III), e.g. in soil or wood, is in the same range as these final effluent traces. There is a reason for this: it is known, that Cr (III) is an important trace element in the biological cosmos.

The statement “Industry has 12 months to prepare and decide on which alternative solution to use – or come up with new ones.” is nonsense. It could be understood as meaning that chromium tanning will no longer be permitted in 12 months time. Good tanneries will continue to produce chrome tanned leather that is free of chromium VI – even the limited data in the Danish study suggests that the majority of leather is free of Chromium VI.

The leather industry as represented by the GLCC (i.e. ICT, IULTCS, ICHSLTA) would like to file a correction of the article to be published in one of the future editions. Current state of the art chromium tanning technology from an environmental point of view is sustainable. The resulting chromium tanned leather is safe and has unique performance properties which are not achievable with any other tanning technology. Similar to steel, where only chromium can upgrade iron to resistant stainless steel only a Chrome Tanning Salt can achieve certain leather properties. The world gets not safer, if chromium as a tanning agent will be banned. The focus has to be like in many other industries to stop outdated operations and process technologies, and bring the current tanning technology globally on a sustainable level.

Respectfully submitted,

Global Leather Coordinating Committee

ICT: www.leathercouncil.org

IULTCS: www.iultcs.org

ICHSLTA: www.ichslta.com