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**Sustainable Leather Foundation  
Standard for Restricted Substances (Duty of Care)**

**Reference:** FSG9.1

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## **FSG9 RESTRICTED SUBSTANCES (DUTY OF CARE) STANDARD AND BENCHMARK**

**Summary:** The SLF Restricted Substances (Duty of Care) standard provides the context, definitions, and methodology around RSL in the leather industry. This document gives the facility under audit the principles and general expectations, but it is not exhaustive and recognises that there will be differences within regions for national and local laws.

Where there are matters of interpretation in relation to the standard, applicable laws or organisational norms, the auditor will assess in favour of the employees in that facility.



## 1. Scope

1.1 The *SLF Restricted Substances (Duty of Care) Standard and Benchmark* specifies the definitions and structure of a restricted substances document establishing the policy, plan, and restricted substance goals for a particular facility. The key areas include aspects and impacts register, restricted substance objectives and targets, aspects screening, communication to employees, record keeping, risk analysis, continuous improvement, training, and internal management/audit review processes.

1.2 A Restricted Substances List system is an integral part of promoting a safe and healthy environment for the employees and community while minimising negative impact on the surrounding internal and external environments.

1.3 The *SLF Restricted Substances (Duty of Care) Standard and Benchmark* is intended to ensure that SLF certified facilities are aware of the necessary systems required to build, implement, and manage environmental aspects and are actively working to improve the environmental impact of their operations.

## 2. Normative references

The following referenced documents are useful in the understanding of this document and are provided for further guidance. In the case of dispute these references form the core of the evidence in support of the Standard used here:

ISO 14001:2015 Environmental management systems – Requirements with guidance for use<sup>1</sup>

ZDHC Manufacturing Restricted Substance List<sup>2</sup>

ZDHC and Outdoor Industry Association Chemicals Management Working Group - Using Chemical Hazard Assessment for Alternate Chemical Assessment and Prioritization<sup>3</sup>

## 3. Terms and definitions

3.1 **Restricted Substances:** Materials, chemicals, and substances that are restricted or banned in finished leather products because of regulation or law.

3.2 **Restricted Substances Aspects and Impacts Register:** A documented list of an organisation's activities, products or services that interacts or can interact with a restricted substance and their actual or potential effect on safety, quality, and the environment.

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<sup>1</sup> <https://www.iso.org/standard/60857.html>

<sup>2</sup> <https://mrsl.roadmaptozero.com/>

<sup>3</sup> [https://uploads-ssl.webflow.com/5c4065f2d6b53e08a1b03de7/5db6ee355bd8c43c99320b39\\_Haz\\_Assessment.pdf](https://uploads-ssl.webflow.com/5c4065f2d6b53e08a1b03de7/5db6ee355bd8c43c99320b39_Haz_Assessment.pdf)



**3.3 Aspect Screening:** A process in which an organisation’s activities, products, or services are reviewed and monitored to determine the status and outline actual or potential impacts (with reference to restricted substances for this Standard and Benchmark).

**3.4 Third-Party Auditor:** An independent contractor or service entity conducting a certified audit outside of SLF and the organisation involved.

**3.5 Continuous Improvement:** Recurring action to enhance performance (in this case, avoidance/substitution of restricted substances), typically involving a feedback mechanism that outlines progress and provides solutions.

## 4. Principle

4.1 The principle of the *SLF Restricted Substances (Duty of Care) Standard and Benchmark* is based upon the need for responsible organisations to avoid/minimise/substitute a restricted substance to ensure their product eliminates as many restricted substances as required by law or requested by customer. The establishment of a Restricted Substances procedure is intended to provide a systematic approach by:

- 4.1.1 Protecting the environment, health, and safety of those to interact with the product throughout its life cycle (manufacturing through to end use)
- 4.1.2 Mitigating the potential adverse effects of utilising potentially hazardous products within the organisation
- 4.1.3 Assisting the organisation in the fulfilment of legal, regulatory and compliance obligations
- 4.1.4 Enhancing environmental, health and safety performance
- 4.1.5 Achieving financial and/or operational benefits that strengthen the organisation’s market position through elimination or substitution of chemicals
- 4.1.6 Communication of restricted substances information to relevant interested parties

4.2 The Restricted Substances (Duty of Care) procedure may be based off the Plan-Do-Check-Act (PDCA) model. The PDCA model is an iterative process aimed at achieving continual improvement. Each of the elements of an environmental management system can utilise the PDCA model to establish a consistent, systematic approach.

The PDCA model can be described as the following:

- 4.2.1 Plan: Establish restricted substances objectives and processes necessary to deliver results in accordance with the organisation’s restricted substance policy
- 4.2.2 Do: Implement the process as planned
- 4.2.3 Check: Monitor and measure processes against the restricted substance policy, including its commitments, environmental objectives, and operating criteria, and report the results
- 4.2.4 Act: Take actions to continually improve

4.3 The Restricted Substances procedure will be most effective with alignment directly related to the conformities, obligations, and requirements of the organisation’s legal, regional and customer requirements for its facility, service, product, and operations. The *SLF Restricted Substances (Duty of Care) Standard and Benchmark* provides an outline for the method of creating a system, however it is up to the organisation to



apply a risk-based approach, seeking confirmation of its restricted substance obligations and requirements prior to audit and certification.

## 5. Procedure

5.1 The facility will provide data and documentation that demonstrates an effective management system to meet the requirements of the *SLF Restricted Substances (Duty of Care) Standard and Benchmark* as follows:

- 5.1.1 Restricted substances aspects and impacts register and screening procedure
- 5.1.2 Restricted substances document containing RSL scope, policy, and plan (Reference SLF Explanatory Notes & Templates for further details)
- 5.1.3 Provide evidence of subcontractors and suppliers monitoring and addressing RS issues
- 5.1.4 Restricted Substances communication and training plan
- 5.1.5 Restricted Substances report consisting of goals (objectives and targets) and actions
- 5.1.6 Accessible resource clearly displaying the structure of responsible personnel for Restricted Substances plans
- 5.1.7 Evidence of the execution of the Restricted Substance plan
- 5.1.8 Entry log documenting risk and internal audit frequency
- 5.1.9 Continuous improvement mechanism, feedback system, and evidence of implementation
- 5.1.10 Breakdown of measured total Restricted Substance avoidance/substitution performance
- 5.1.11 Management review process and engagement in Restricted Substances policy and plan

5.2 The measurement of total Restricted Substances performance may differ throughout the leather industry based upon which part of the leather-making process the facility takes part in and where the facility is located globally. Please reference the following SLF Standards and Benchmarks and Sections of the Explanatory Notes & Templates for specifics on environmental performance metrics and measurement methods. These documents are located in the “Technical Library” within the Partner Only Resources area of the website and are designed to support either in preparation for audit or for improvement measures:

<https://sustainableleatherfoundation.com/partner-only-resources/technical-library>

- 5.2.1 FSE8.1 Raw Materials and Chemicals
- 5.2.2 FSG8.1 Chemical Control
- 5.2.3 Explanatory Notes and Templates
  - a. Template 2 – Environmental Aspects and Impacts Register
  - b. Template 5 – Best Available Technique Register
  - c. Template 7 – Restricted Substance Policy
  - d. Appendix 1 – Internal PRSL
  - e. Appendix 2 – External MRSL

**Sustainable Leather Foundation**  
**Standard for Restricted Substances List (RSL)**

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