

Specific Business Requirements For Europe, Russia and India Portfolio

Technical & Regulatory Requirements for Europe, Russia and India

Terms and Conditions of Trading:

With reference to the Terms and Conditions of Trading the following will apply:

- a) All products must comply with all relevant European Union and national legislation, regulations, directives, or practices and any other requirements, which may from time to time be in force, relating to the supply, offer for sale, sale, and safety of the products, for all countries in which they are offered for sale.
- b) The Supplier to provide all documentation required by Procurement Europe & Russia (PER) or any European Union or national or local governmental authority or agency necessary to prove and demonstrate compliance with the requirements of paragraph (a) above and any required marks such as CE mark. The Supplier shall supply only products so certified.
- c) The Supplier to ensure that all tests necessary to obtain certification under (a) or (b) above have been carried out in accordance with any and all applicable legislation, requirements, rules or regulations, and that any and all such tests are conducted by a test house approved by the European Union, as may from time to time appear in the Official Journal of the European Union.
- d) Supplier warrants that product claims shall at all times be true and accurate. The Supplier shall, upon the request of Procurement Europe & Russia (PER), and as may otherwise be required by any national or local governmental authority or agency immediately provide any and all documentation necessary to prove or otherwise substantiate any and all product claims.

Product Specifications

Following written notification from Procurement Europe & Russia (PER) that you have been provisionally selected, you will be issued product specification referred to in the Terms and Conditions of Trading. These will be drafted by the Research and Development (R&D) department and submitted to the supplier. The product specifications are part of the Trading Terms and Conditions between both parties.

The Product Specifications used are product specific. The product specification drafts are submitted to the supplier by the R&D department or PER for the document to be completed signed and returned. The product specification is a working document updated when required with information incited by R&D or PER and signed off by the supplier to implement the agreed updates.

Each product will also require 'Certificate of Quality' 'Certificate of Free Sale' and 'Certificate of Compliance', templates of these forms will be sent to the supplier by PER or R&D.








Please refer to the Product Specification for specific product requirements or contact the Research & Development (R&D) department if you have any concerns.

Please see the following information for examples of some of the current legislations that are product specific, this information is subject to change.

Mobius Symbols:

Packaging component materials must be labeled with the triangular international symbol (mobius logo). This mobius symbols must be visible on the outside of the packaging with the number and letter designation for the type of material used.

Mobius symbols for packaging Plastics Coding System consists of a number from 1 to 7 inside a chasing arrows triangle, please see following:

	Polyethylene terephthalate (PET)		Polypropylene (PP)
	High density polyethylene (HDPE)		Polystyrene (PS) or Expandable polystyrene (EPS)
	Unplasticised polyvinyl chloride (UPVC) or Plasticised polyvinyl chloride (PPVC)		Other
	Low density polyethylene LDPE		

Materials other than plastics use the same chasing arrows triangle mobius symbol with the letter and number codes as follows:

Material	Code	EU Identification number
Corrugated Fibreboard	PAP	20
Solid Fibreboard	PAP	21
Paper	PAP	22
Wood	FOR	50
Cork	FOR	51

Please ensure that mobius symbols are shown for all packaging components. By accessing the internet you will be able to obtain any additional mobius symbols that have not been provided above.

Please note that it is the vendor's/factories responsibility to ensure that the correct mobius symbols have been used and are amended if the packaging components should change.

REACH Regulation:

Manufacturers will need to ensure that all chemical ingredients used in the products comply with the REACH regulation (2006/1907/EU). All chemical ingredients used in products must be pre-registered and a later date registered by either the manufacturer, the relevant raw material manufacturer or the importer into the EU.

Access Business Group will require the manufacturer to confirm compliance.

Food products are exempt.

Cosmetic Products:

Cosmetic products must comply with Regulation 1223/2009, As proof of compliance Access Business Group (ABG) requires to obtain a full dossier according to Art. 7a of that directive, including a full safety assessment consisting of an expertise conducted by a competent professional safety assessor, which has to cover the safety assessment of ingredients or combination of ingredients based upon evaluation of their human exposure in the finished product, their chemical structure, their analytical profile, and their general toxicological profile established from all available sources of information.

Home care Detergent Products:

Detergents Directives 648/2004/EU and its amendment 907/2006/EC

CLP Regulation : Regulation (EC) No 1272/2008 of the European Parliament and of the council of 16 December 2008 on classification, labelling and packaging of substances and mixture

For further information on Technical and Regulatory requirements please refer to the Technical Specification

Electrical and Battery Operated Products:

RoHS Directive 2011/65/EU; Hazardous Substances in Electrical and Electronic Equipment:

The RoHS Directive will ban placement into the EU market of new electrical and electronic equipment containing more than designated maximum allowable levels of lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyl (PBB) and polybrominated biphenyl ether (PBDE) flame retardants, effective July 1, 2006.

Manufacturers will need to ensure that their products, parts and components comply with RoHS in order to be distributed and sold in the EU.

WEEE Directive 2012/19/EU (Waste Electrical and Electronic Equipment)

All battery and mains operated products must comply with the WEEE Directive. Products are required to be manufactured so it is easier to dismantle for recycling and crossed out dustbin logo printed on product or packaging and explanation instructions on consumer recycling.

Low Voltage Directive 2014/35/EU CB Test Report is also required

Electromagnetic Compatibility Directive 2014/30/EU

REACH Regulation No 1907/2006 Article 33(1) Obligation

Energy Efficiency Directive 2010/30/EU required for certain domestic electrical products

For further information please refer the website <http://eur-lex.europa.eu>

Food Products & Food Supplements

EU Regulations which need to be followed for all kind of products are EU General Food Law (2002/178/EC), Food Additives (2008/1333/EC), Declaration (2011/1169/EC), Health Claims (2006/1924/EC) and (2012/432/EC), Flavors (2008/1334/EC), Hygiene (2004/852-854/EC), Contaminants (2006/1881/EC), Microbiology (2005/2073) , Novel Food (2015/2283/EC), etc. (listing may be incomplete due to constant regulatory updates). There are special regulations for special food products like olive oil or Meal Replacements (2016/1413/EC), Fortified Food (2006/1925/EC) or Food Supplements (Directive 2002/46/EC). Furthermore there are several non-harmonized national requirements to be taken into account; for instance upper levels on vitamins & minerals and the acceptability of botanicals and herbals. All products need to be GMO-free and must not be irradiated.

Non-EU countries like Switzerland, Norway, Turkey, South Africa, Russia (and India) may have more or less differing Regulations. It is highly recommended to come to an understanding with R&D before starting a project with at least one of these countries involved.

Food Contact Products:

Food contact products require certification, confirming compliance with European Framework Regulation 1935/2004 Material & Articles intended to come in contact with food and 2002/72/EEC European plastic materials in contact with food directive. Health Certificates are required if the product is being supplied into Turkey.

EU Toy Safety Directive 2009/48/EU

For further information on Technical and Regulatory requirements please refer to the Technical Specification.

Costume Jewellery Regulations

REACH ANNEX XVII Nickel release for metal parts that come into prolonged contact with the skin

EN 1810 Body piercing post assemblies

EN 1811:2011+A1:2015 Nickel release for metal parts that come into prolonged contact with the skin

EN 12472 Method of simulation of wear and corrosion for the detection of nickel release from coated items

EU 836/2012 Total lead content in metal

EU494/2011 Total cadmium content in metal

EN1122 for Total cadmium content in plastics and paints and coatings

Textile Products

REACH ANNEX XVII Nickel release for metal parts that come into prolonged contact with the skin

REACH Directive 1907/2006 Restriction of Chemicals Annex XVII

EN ISO 6330 Dimensional stability(+/-5%)

EN ISO 3071 for Textiles,

EN ISO 4045 for leather

REACH Directive 1907/2006/ Free Formaldehyde EN ISO 14184-1

EC & amend.552/2009/EC, azocolourants EN14362 Textile Pentachlorophenol (PCP), ortho Phenylphenol (OPP), Dimethyl Fumarate (DMF)

EN 1811:2011 + A1:2015 Nickel release for metal parts in contact with the skin

Colour fastness to water EN ISO 105 E01

Colour fastness to rubbing EN ISO 105 X12

PH 4.0-8.5 Test

Fibre composition verification

EN ISO 6330:2001 Appearance after wash as care label

Leather and PU Bag Regulations

REACH ANNEX XVII Nickel release for metal parts that come into prolonged contact with the skin
REACH Directive 1907/2006/EC & amend.552/2009/EC, azocolourants
REACH Directive 1907/2006 Restriction of Chemicals Annex XVII

Sunglasses Regulations

Personal Protective Equipment Directive 2016/425 EEC
REACH ANNEX XVII Nickel release for metal parts that come into prolonged contact with the skin

Plastic in Products

All individual plastic components of all products and packaging must comply with REACH Directive no 1907/2006 Annex XVII. Please use the total cadmium test method EN1122. All plastic components are required to have less than 100ppm total cadmium content in all production batches of plastic raw materials.

Packaging Requirements:

All packaging must comply with the European Directive 94/62/EC. It is specified in the requirements of the directive, that the maximum permitted limit for total lead, hexavalent chromium, cadmium and mercury in packaging is 100ppm. CEN Report CR 13695-1:2000 contains suggested test methods to use for packaging materials.

If a polyethylene bag is part of the packaging and has an opening diameter of 190mm or more, and is less than 40 micrometers thick it must carry a suffocation warning in all required languages. Translation of the required suffocation warning is available from European Strategic Procurement in all required languages.

It is acceptable to have polyethylene bags (PE) with a thickness over 40 micrometers with no suffocation warnings or polypropylene (PP) with no suffocation warnings.

Eliminating Mould in Product Shipments:

It is important to control the moisture in our products and to prevent mould growth in any shipments sent to ABG. Please use plastic tape adhesive on boxes instead of paper tape.

Ensure any wet process the product has been subjected to during production is full dry before packing.

The products should be protected from moisture and kept in a controlled humidity area during production and storage after packing.

The fungicide DMF dimethyl fumarate used to control mould growth has been banned in Europe. Please use an alternative where required, that complies with the European regulations to prevent mould growth.

Silica gel sachets absorb moisture but do not inhibit the growth of mould. Here is suggested alternative anti-mould patches that can be used, which are produced by a company called Micro-Pak Ltd (website www.micropakltd.com).

For the regulation on wood packaging please refer to 'Shipping – Pallets' section on Portal.

Implication of Non Conformity:

In the event that the Supplier supplies products which do not conform with the provisions as detailed above, these products may be returned to the Supplier or the country of origin (if different) at the Supplier's expense. The price of such non-conforming products may, with the Supplier's agreement, be deducted from sums otherwise payable to the Supplier in relation to other products or batches of products, save that if the price payable has already been paid, Access Business Group Companies may require immediate reimbursement of same, such reimbursement in no circumstances to take place later than 10 days following such a request.