ZDHC MRSL
Industry Standard
Implementation Approach

Version 2.0
November 2022
**Introduction**

The ZDHC Manufacturing Restricted Substances List (MRSL) V2.0 and the ZDHC MRSL Conformance Guidance document V1.1 have been updated to ZDHC MRSL V3.1 and ZDHC MRSL Conformance Guidance V2.0 respectively. The update occurred in November 2022 in line with ZDHC MRSL Update Principles and Procedures Guidelines V3.0. We have created an implementation plan so that each stakeholder group connected to the ZDHC Roadmap to Zero Programme has clarity on the timelines and actions required for the successful adoption and implementation of the guidelines.

Four key stakeholders are essential to the implementation:

1. ZDHC Approved MRSL Certifiers
2. Chemical Formulators
3. Suppliers and manufacturing facilities
4. Brands and retailers

Stakeholders have 12 months to take the actions required by this implementation approach to ensure adoption and complete implementation by the cut-off date for each stakeholder.

The transition timeline for the implementation approach is defined as:

- **Launch**
  - ZDHC MRSL V3.1 and ZDHC MRSL Conformance Guidance V2.0 released in public domain
  - By 01 November 2022

- **Solution Provider Platform is opened for certifier’s acceptance submissions**
  - By 01 November 2022

- **Publication of the first release of the list of ZDHC Approved MRSL Certifiers for ZDHC MRSL V3.1**
  - By 01 February 2023

- **Only ZDHC MRSL V3.1 conformant formulations verified by ZDHC Approved MRSL Certifiers are accepted for upload in the ZDHC Gateway.**
  - By 01 November 2023

- **All ZDHC MRSL V2.0 products will be archived. Only ZDHC MRSL V3.1 Conformance Level certified formulations are visible in the ZDHC Gateway.**
  - From 01 June 2024

**General Impact**

ZDHC MRSL V3.1 and Conformance Guidance V2.0 impact each stakeholder in these ways:

- To become a ZDHC Approved MRSL Certifier, certifiers need to apply for approval by ZDHC to issue certification for the ZDHC MRSL V3.1 and for the appropriate ZDHC MRSL Conformance Levels according to the criteria detailed in ZDHC MRSL Conformance Guidance V2.0
- Chemical Formulators need to recertify their products to ZDHC MRSL V3.1 and upload these products to the ZDHC Gateway at the appropriate ZDHC MRSL Conformance Levels
- Suppliers and manufacturing facilities need to update their chemical inventory and recipes for ZDHC MRSL V3.1 conformant products and use up stocks of ZDHC MRSL V2.0 conformant products before the cut-off date of 01 June 2024
- Brands and retailers need to inform and train their supply chain partners on the new requirements of ZDHC MRSL V3.1 and MRSL Conformance Guidance V2.0 and set new targets to be achieved

All stakeholders should adopt the ZDHC MRSL V3.1 and the decision to use the latest version of ZDHC MRSL should be evident in a company’s internal and external policies, and communications. ZDHC MRSL V3.1 must be referenced in communications either through the company website, text or simply by communicating ZDHC MRSL V3.1 in full.

- Scope can be defined by the organisation based on its scope of business and exemptions can be made for valid reasons, e.g. workwear (for example hospital, functional police and army uniforms), or personal protective equipment (for example fire-fighter, combat or car-racing gear)
- An organisation has the right to add additional substances to be rated as adopting ZDHC MRSL, however, all communication must refer to ZDHC MRSL as the primary document and any additional substances included as an organisation-specific appendix.

Implementation occurs when steps are taken – beyond adoption – to put the decision into action. These steps could be but are not limited to, training, change in purchase actions, and the primary tracking of compliance with the new policy.
ZDHC Approved MRSL Certifiers - Implementation Approach

Certifiers need to start with internal actions in their organisation beginning with a study of the ZDHC MRSL Conformance Guidance V2.0 and the ZDHC MRSL V3.1 documents to evaluate how their certification aligns with the criteria in these guidelines and if any updates to their internal systems and own certification criteria are needed.

After checking their internal systems, a certifier can apply to become a ZDHC Approved MRSL Certifier for the ZDHC MRSL V3.1 conformance through the process outlined in the Solution Provider Platform. If all is in good order, ZDHC will communicate acceptance at the appropriate ZDHC MRSL conformance level through the ZDHC website.

ZDHC Approved MRSL Certifiers are able to certify against ZDHC MRSL V2.0 until 01 February 2023. However, it is recommended that formulators are advised not to certify to ZDHC MRSL V2.0 towards the later part of 2022.

Each ZDHC Approved MRSL Certifier will need to communicate their process for updating their certification from ZDHC MRSL V2.0 to ZDHC MRSL V3.1.
The transition timeline and activities for ZDHC Approved MRSL Certifiers are:

**Transition for ZDHC Approved MRSL Certifiers**
ZDHC MRSL V3.1 & MRSL Conformance Guidance V2.0

- **Begin Transition**
  - ZDHC Approved MRSL Certifiers can continue to certify for ZDHC MRSL V2.0 & ZDHC MRSL Conformance Guidance V1.1 Conformance Levels.
  - Process of review and final approval of ZDHC Approved MRSL Certifiers that submitted their applications before 15 Dec 2022.
  - ZDHC Approved MRSL Certifiers study and understand the ZDHC MRSL V3.1 & ZDHC MRSL Conformance Guidance V2.0 and apply through the **Solution Provider platform**.

- **End Transition**
  - ZDHC Approved MRSL Certifiers issue certificates for ZDHC MRSL V3.1 & ZDHC MRSL Conformance Guidance V2.0 Conformance Levels.
  - To verify products only with ZDHC MRSL V3.1 uploaded in the ZDHC Gateway by formulators.
  - List of ZDHC Approved MRSL Certifiers for ZDHC MRSL V3.1 and ZDHC MRSL Conformance Guidance V2.0 published by ZDHC.

**2022: Transition Year**
- ZDHC Approved MRSL Certifiers study and understand the ZDHC MRSL V3.1 & ZDHC MRSL Conformance Guidance V2.0 and apply through the **Solution Provider platform**.

**2023: Supply Chain Implementation**
- ZDHC Approved MRSL Certifiers can continue to certify for ZDHC MRSL V2.0 & ZDHC MRSL Conformance Guidance V1.1 Conformance Levels.
- ZDHC Approved MRSL Certifiers issue certificates for ZDHC MRSL V3.1 & ZDHC MRSL Conformance Guidance V2.0 Conformance Levels.
- To verify products only with ZDHC MRSL V3.1 uploaded in the ZDHC Gateway by formulators.
Chemical Formulators - Implementation Approach

Formulators need to take key steps to implement the new guidelines:

1. Check for the newly added substances listed in ZDHC MRSL V3.1 in the current product portfolio (and the candidate list – optional)
2. Check the limits for unintentional impurities of the substances listed in the ZDHC MRSL V3.1 in the product portfolio
3. Update or replace formulations which do not meet the above two criteria
4. Select a suitable ZDHC Approved MRSL Certifier and certify the products for ZDHC MRSL V3.1 at the required ZDHC MRSL Conformance Level according to ZDHC MRSL Conformance Guidance V2.0
5. Upload and publish the certified products in the ZDHC Gateway

Formulators can prepare themselves by studying the substances listed in the candidate list of ZDHC MRSL V3.1 and taking action for phasing out these substances in their product portfolio.

For products that haven’t been certified to ZDHC MRSL V2.0, it is advisable to directly certify to ZDHC MRSL V3.1 with ZDHC Approved MRSL Certifiers that are approved for ZDHC MRSL V3.1 certification.
Chemical Formulators - Implementation Approach (continued)

The transition timeline and activities for Chemical Formulators is:

**Transition for Chemical Formulators**

**ZDHC MRSL V3.1 & ZDHC MRSL Conformance Guidance V2.0**

**Begin Transition**

- Chemical Formulators study and understand the ZDHC MRSL V3.1 document
- Prepare for conformance levels given in the ZDHC MRSL Conformance Guidance V2.0
- Check presence of ZDHC MRSL V3.1 substances in their product portfolio
- Remove ZDHC MRSL V2.0 non-conformant formulations from product portfolio
- Develop ‘non-regrettable’ alternatives
- Where possible, check Candidate List substances to prepare for ZDHC MRSL V4.0

**End Transition**

- Certify products against the ZDHC MRSL V3.1 and ZDHC MRSL Conformance Guidance V2.0 with ZDHC Approved MRSL Certifiers
- Upload ZDHC MRSL V3.1 conformant products on ZDHC Gateway
- Provide feedback via the ZDHC MRSL Submission Platform on candidate list substances

**2022: Transition Year**

- Upload products only certified for ZDHC MRSL V3.1 AND ZDHC MRSL Conformance Guidance V2.0 in the ZDHC Gateway
- ZDHC MRSL V2.0 certified products will be archived in the ZDHC Gateway

**2023: Supply Chain Implementation**
Facilities / Suppliers - Implementation Approach

Suppliers should start with two keys steps:

1. Have a clear overview of all the chemicals used in the facility and the current ZDHC MRSL Conformance Levels of these chemicals
2. Start communication with their chemical vendors about ZDHC MRSL V3.1 and ZDHC MRSL Conformance Guidance V2.0

They must make clear the deadline of 01 November 2023 after which Suppliers should purchase only those chemical products that conform to ZDHC MRSL V3.1.

There may be changes to the ZDHC MRSL Conformance Levels of current inventory in line with ZDHC MRSL Conformance Guidance V2.0, so Suppliers should ensure that these levels are maintained for new chemical purchases affected after 01 November 2023.

Suppliers must aim to exhaust stocks of ZDHC MRSL V2.0 products from their inventories by 1 June 2024 at the latest. The Performance InCheck Report will show both ZDHC MRSL V2.0 and ZDHC MRSL V3.1 products until 01 June 202.
Facilities / Suppliers - Implementation Approach

The transition timeline and activities for Suppliers and manufacturing facilities is:

Transitions for Suppliers
ZDHC MRSL V3.1 & ZDHC MRSL Conformance Guidance V2.0

**Begin Transition**
- Purchase of ZDHC MRSL V2.0 conformant products
  - 01 Nov 2022

**2022: Transition Year**
- Check chemical inventory ZDHC MRSL Conformance Levels
- Accept ZDHC MRSL V2.0 formulations for new chemical purchases

**End Transition**
- ZDHC InCheck Report will show both ZDHC MRSL V2.0 and V3.1 products
  - 01 Nov 2023
  - 01 Feb 2023

**2023: Supply Chain Implementation**
- Use chemical formulations in stock with ZDHC MRSL V2.0 Conformance Levels
- Wherever possible, start purchase of ZDHC MRSL V3.1 conformant formulations

- Purchase and accept only products that are ZDHC MRSL V3.1 conformant for fresh chemical purchases
- Exhaust all inventory of ZDHC MRSL V2.0 products

- ZDHC InCheck Report will only show ZDHC MRSL V3.1 and ZDHC MRSL Conformance Guidance V2.0 products
  - 01 June 2024
Brands / Retailers - Implementation Approach

The role of Brands and retailers is to communicate and create awareness about the documents and the implementation plan to their supply chain partners.

Training should be carried out through ZDHC Academy, webinars or regional workshops. Brands should insist on ZDHC MRSL V3.1 conformant inventory in ZDHC InCheck Reports from their Suppliers from 01 June 2024.

The transition timeline and activities for Brands and retailers is:

**Transition for Brands**

ZDHC MRSL V3.1 & ZDHC MRSL Conformance Guidance V2.0

**Begin Transition**

- Communicate to your Supply Chain for adoption of the ZDHC MRSL V3.1 and ZDHC MRSL Conformance Guidance V2.0
- Communicate requirements of the ZDHC MRSL V3.1 conformant inventory with effect from 01 November 2023
- Train Suppliers on ZDHC MRSL V3.1 and ZDHC MRSL Conformance Guidance V2.0 wherever necessary

**End Transition**

- Train Suppliers to move to ZDHC MRSL V3.1 products when new chemical formulations are used in facilities
- Allow Facilities to use ZDHC MRSL V2.0 conformant stock
- ZDHC InCheck report will show ZDHC MRSL V3.1 conformant inventory, except for residual stocks of ZDHC MRSL V2.0 products at the Supplier’s facility

**2022: Transition Year**

- ZDHC InCheck report will show the ZDHC MRSL V3.1 conformant inventory only
- Set targets for new ZDHC MRSL Conformance Levels for chemical inventory

**2023: Supply Chain Implementation**

- Continue to accept ZDHC MRSL V2.0 conformant inventory in ZDHC InCheck Reports
- ZDHC MRSL V2.0 and V3.1 conformant inventory in ZDHC InCheck Reports