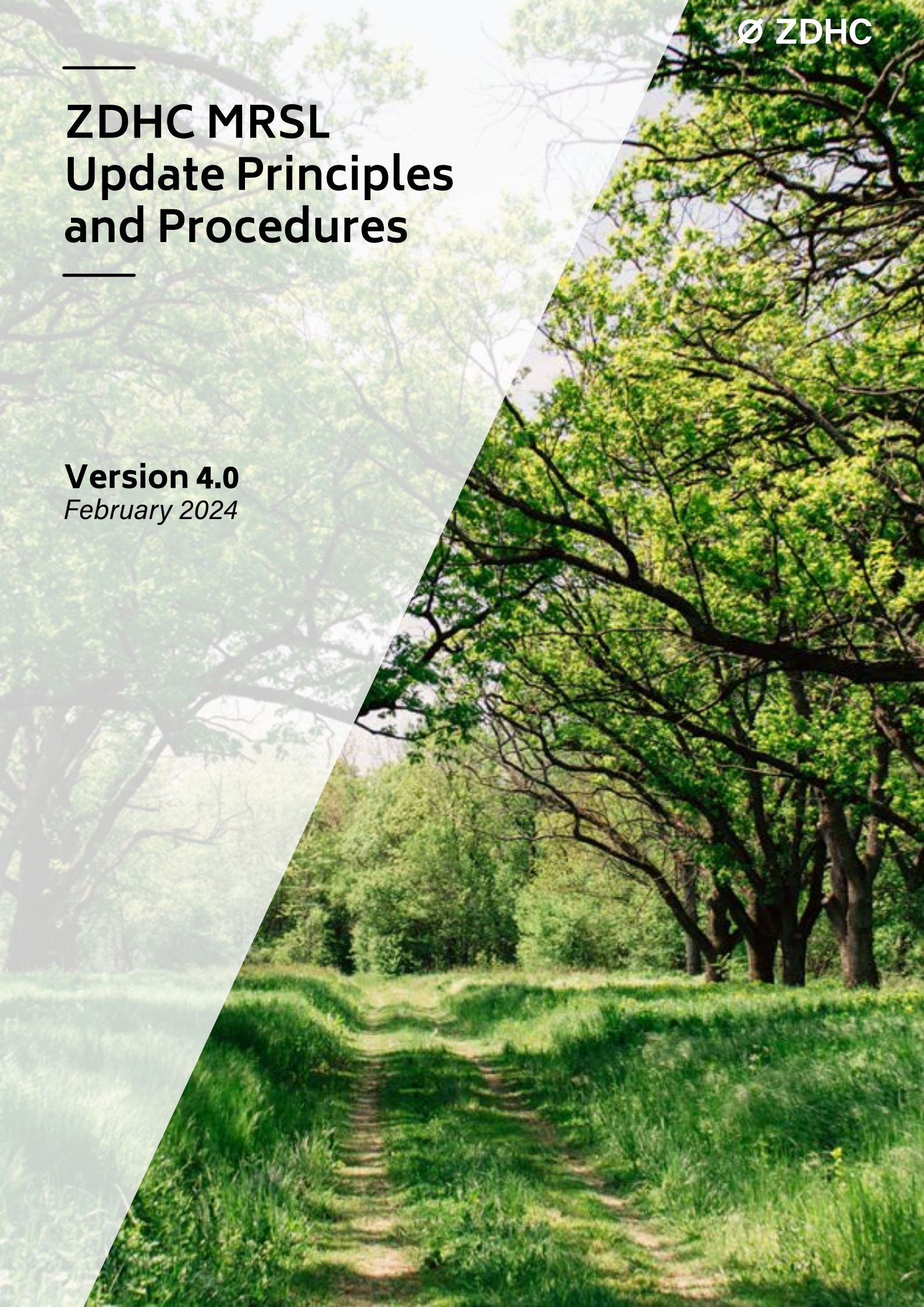


---

# ZDHC MRSL Update Principles and Procedures

---

**Version 4.0**  
*February 2024*



## DISCLAIMERS

The ZDHC Foundation (hereinafter “ZDHC”) MRSL Update Principles and Procedures V4.0 is not intended nor can be used as a statement of legal requirements. The ZDHC MRSL Update PnP is a ZDHC specific document explaining the policy for updating the ZDHC MRSL and should be strictly used only as such. This document is shared with our community in the spirit of transparency and accountability.

Whilst ZDHC takes every reasonable effort to make sure that the content of this ZDHC MRSL Update Principles and Procedures V4.0 is as accurate as possible, ZDHC makes no claims, promises, or guarantees about the accuracy, completeness, or adequacy of the contents of this ZDHC MRSL Update Principles and Procedures V4.0.

In no event will ZDHC (and/or any related ZDHC majority owned legal entities) or the Directors or staff thereof be liable and ZDHC expressly disclaims any liability of any kind to any party for any loss, damage, or disruption caused:

- a) By errors or omissions, whether such errors or omissions result from negligence, accident, or any other cause and/or;
- b) From any use, decision made or action taken or any other kind of reliance on the ZDHC MRSL Update Principles and Procedures V4.0 by a reader or user of it and/or;
- c) For any results obtained or not obtained from the use of the ZDHC MRSL Update Principles and Procedures V4.0.

For the avoidance of doubt this Disclaimer applies to all related documents produced by the ZDHC Group.

## Introduction

The ZDHC Manufacturing Restricted Substances List (ZDHC MRSL) is a list of chemical substances banned from intentional use in suppliers that process textile materials and trim parts in textile, apparel, leather, and footwear. The ZDHC MRSL is a living document, and is updated as needed to expand the materials and processes covered and to add substances that should be phased out of the value chain. This Principles and Procedures (PnP) document contains and explains the process used to update the ZDHC MRSL. These principles and procedures ensure that the update process remains transparent, inclusive, and efficient whilst keeping in mind that the updates should reduce hazards and impacts based on the best available information.

## Revision History

In the spirit of continuous improvement, the ZDHC MRSL Update Principles and Procedures (PnP) will be reviewed regularly and revised to incorporate learnings and opportunities identified during the practical application and implementation of these proceedings. This update does not change the update process. Instead, the changes in this version are limited to clarifications of procedures, roles and responsibilities. A historical record of the updates to these guidelines is noted below.

Version Number	Changes	Time of Publication
Version 4.0	<ul style="list-style-type: none"> <li>▪ The review process has been updated to 7 steps from the previous 5 steps.</li> <li>▪ Submission, Processes and Criteria Chapter reduced detail as further information is available in the ZDHC Submission Platform.</li> </ul>	February 2024
Version 3.0	<ul style="list-style-type: none"> <li>▪ Information on ZDHC Principles Section.</li> <li>▪ Updates in Figure 1,2, and 3.</li> </ul>	November 2022
Version 2.0	<ul style="list-style-type: none"> <li>▪ Clarification of process flow chart, responsibilities, review process.</li> </ul>	May 2021
Version 1.0	<ul style="list-style-type: none"> <li>▪ Release of Version 1.0.</li> </ul>	January 2019

---

**CHAPTER 1:**

# ZDHC MRSL Update Principles

---

ZDHC is committed to the following objectives for updates to the ZDHC MRSL.

- **TRANSPARENCY:** Meaning using a publicly transparent process for receiving and evaluating proposals to add chemicals to the ZDHC MRSL.
- **INCLUSIVITY:** Meaning engaging stakeholders from ZDHC Signatories i.e. Brands, value chain affiliates (including the textile and footwear industry and the chemical industry) as well as associates such as non-governmental organisations and industry association/multi-stakeholder organisations. Further, any organisations and companies, including ZDHC Approved Solution Providers and non-ZDHC Signatories, can be part of the update process through submitting proposals for additions to the ZDHC MRSL.
- **BEST AVAILABLE INFORMATION:** Meaning applying a science-based decision making approach, that considers both the degree of hazard and extent of exposure potential in setting priorities using the best available information as well as allowing for the incorporation of significant new information to ensure prioritisation decisions remain as current as is possible.
- **REDUCE HAZARD:** Meaning a regular update process that ensures hazardous chemicals are added to the ZDHC MRSL when viable alternative chemicals or processes become commercially available. The regular update process ensures a system of continuous improvement to add hazardous chemicals to the ZDHC MRSL ensuring that possible risk to human health and the environment is reduced where viable safer alternative chemicals or processes are commercially available, technically and economically feasible. For proposed ZDHC MRSL additions that meet listing criteria but do not yet have safer alternatives at scale, innovation to find alternatives is encouraged by listing the substance on the ZDHC Candidate List with a sunset date. If a chemical substance is legally restricted in chemical formulations or as chemical substance then ZDHC may add this substance in the ZDHC MRSL in absence of safer alternatives.

- **REDUCE IMPACT:** Meaning keeping in mind that hazardous chemicals are one part of the overall sustainability of the industry and that reducing negative impact on people and the environment is the overarching goal. Therefore, the wider implications on water and energy use should also be taken into account when alternatives are evaluated.
- **EFFICIENCY:** Meaning a timely and dependable cycle of review, based on the efficient use of the ZDHC organisational resources.

# ZDHC MRSL Update Process at a Glance

## 2.1 Seven Step Review Process

Figure 1 provides a brief summary of the entire ZDHC MRSL update process. This is a seven steps review process and takes place on a rolling basis, which may include adding new substances, updating limits, changing test methods, and/or scope of the ZDHC MRSL. The submission of a proposal must take place on the MRSL Section of the ZDHC Submission Platform. All other review steps must also take place on the ZDHC Submission Platform. In addition to the substances from the ZDHC MRSL Submission Platform, the MRSL Council is empowered to unilaterally add substances to the ZDHC MRSL without a formal proposal to make the ZDHC MRSL more robust or align with other certification schemes to enable stakeholders a much wider choice of approved formulations.



## 2.2 Decision Matrix

The ZDHC Sustainable Chemical Management Competence Centre (SCM CC) Technical Manager, should provide the MRSL Council with a recommended scope of the update project based on the feedback and suggestions from ZDHC Signatories via town hall meetings and/or hackathons and from proposals submitted by proposing entities through the MRSL Section in the ZDHC Submission Platform. During steps three and seven, the MRSL Council takes the final decision on the proposals, for inclusion in one of the decision options below.

<p><b>A) ZDHC MRSL</b></p> <ul style="list-style-type: none"> <li>• Add new substance.</li> </ul> <p style="text-align: center;"><b>OR</b></p> <ul style="list-style-type: none"> <li>• Add new engineering control.</li> </ul> <p style="text-align: center;"><b>OR</b></p> <ul style="list-style-type: none"> <li>• New manufacturing limit concentrations for previously listed substances.</li> <li>• Inclusion in ZDHC MRSL will take place in the next revision or update.</li> </ul>	<p><b>B) ZDHC Candidate List</b></p> <ul style="list-style-type: none"> <li>• Chemical substances lacking viable, safer, or widely/readily available alternative chemicals or processes.</li> <li>• Enough information on the proposed substances (missing tox data or amounts currently found in formulations etc.) is not available.</li> <li>• For each chemical substance included in this list, a specific time-scale for inclusion to the ZDHC MRSL may be indicated. e.g. "Substance X will be added in 2025".</li> </ul>
<p><b>C) Substances Under Review – pending further information</b></p> <ul style="list-style-type: none"> <li>• A substance without required data and information cannot be reviewed for addition to the ZDHC MRSL.</li> <li>• ZDHC may ask the wider ZDHC community for data on the missing points.</li> <li>• Once the information is available the proposal may be re-entered in the review process for inclusion in the ZDHC MRSL or ZDHC Candidate List.</li> </ul>	<p><b>B) Archive List</b></p> <ul style="list-style-type: none"> <li>• Substances that are no longer in use within the textile, apparel, leather and footwear industry and are therefore no longer necessary for listing within the ZDHC MRSL.</li> <li>• These substances are recognised to be hazardous; however, they no longer need to be routinely tested because they have been phased out of use in the industry.</li> </ul>

Figure 2: Decision Options for ZDHC MRSL Submissions

## 2.3 The review process in detail

### 2.3.1 Step one: Proposals

The first step of the update process is to collect feedback, suggestions and proposals from ZDHC Signatories as well as the wider ZDHC community engaged in our ZDHC Roadmap to Zero Programme. Proposals are collected in two ways: (1a) via town hall meetings and hackathons with ZDHC Signatories, organised by RtZ Delivery Team along with the ZDHC Competence Centres and (1b) via the MRSL Section in the ZDHC Submission Platform. The RtZ Delivery Team along with the ZDHC Competence Centre will organise the town hall meetings and/or hackathons and these will be communicated through ZDHC newsletters and during Advisory Groups calls. All entities and stakeholders can also input their proposals using the MRSL Section in the ZDHC Submission Platform. For more details on the submission process using the MRSL Section in the ZDHC Submission Platform and eligibility criteria of the proposals please refer to Chapter 3.0.

### 2.3.2 Step two: Review of proposals and defining the scope of the update to the guidelines

The review of proposals will be carried out by the RtZ Delivery Team along with ZDHC SCM Competence Centre, to:

- Highlight to the MRSL Council discardable proposals which are not meeting eligibility criteria, are irrelevant or out of scope.
- Identify and merge duplications or overlaps between proposals.
- Seek clarifications from the proposing entity in case proposals are unclear or incomplete.
- Carry on additional research for relevant information if needed.

The outcome of this activity is to prepare a detailed document to be shared with and finally approved by the MRSL Council, that will define the scope of the revision.

---

### 2.3.3 Step three: Finalisation of the updated scope

The scope of the update proposed by the SCM Competence Centre will be reviewed by the MRSL Council members. Wherever required the MRSL Council may ask for clarifications or more details from the SCM Competence Centre. The MRSL Council is also empowered to include additional substances and topics, after discussion with the SCM Competence Centre. The final scope of the update to the guidelines is then signed off by the MRSL Council.

---

### 2.3.4 Step four: MRSL Council working and decision making

The MRSL Council starts to actively work on making decisions on the proposals and suggestions covered under the scope of the updates. The MRSL Council, in co-ordination with the SCM Competence Centre, can decide to form focus groups drawn from ZDHC Signatories, or on rare occasions from external experts, on specific topics/tasks in the scope of the update for data collection or further research or technical inputs. The MRSL Council can also request ad hoc support from the ZDHC Advisory Groups for specific topics or tasks. The management of these focus groups, external experts and advisory groups in the update discussions will be the responsibility of the ZDHC SCM Competence Centres and RtZ Delivery Team. Based on the above, the MRSL Council will make decisions on the proposals and the SCM Competence Centre, Technical Manager and Technical Writer, will create a first draft of the updates to the guidelines.

---

### 2.3.5 Step five: Consultation and review

The scope of step five is to collect comments, suggestions, feedback on the first draft. It is conducted with two simultaneous activities co-ordinated by ZDHC SCM Competence Centre: one is the ZDHC Signatories review, the second is a public consultation that may involve one or more representatives of the following groups selected by MRSL Council and SCM Competence Centre: like minded organisation, NGOs, government agencies, academic institutions, and other interested parties.

A timeline to provide comments, suggestions, and feedback on the draft document is communicated to these stakeholders. The consultation and review period will be communicated to ZDHC Signatories via newsletters while the entities involved in the public consultation will be contacted via email.

---

### 2.3.6 Step six: Review feedback and final draft

Based on the feedback received from ZDHC Signatories and the public consultation, the SCM Competence Centre will discuss them with the MRSL Council and it will make the relevant changes to the document and prepare a second/final draft. When another round of review by ZDHC Signatories/proposing entities involved in the public consultation is required, e.g. if there are substantial changes advised on the first draft, it will be the responsibility of the SCM Competence Centre to co-ordinate this review step.

---

### 2.3.7 MRSL Council final approval

In case the final draft includes substantial changes compared to the first one, a final approval of the technical changes will be requested to the MRSL Council. The Council is entitled to approve or require technical modification. After receiving MRSL Council approval, or after MRSL Council's required modifications have been updated, the document will go to the publication phase.

## 2.4 Roles and responsibilities

For a better understanding of roles and responsibilities of the involved parties please refer to the following table.

Step	Roles and Responsibilities	ZDHC Competence Centres	MRSL Council	ZDHC Signatories	Entities involved in the public consultation	Any interested party
Submitting proposals (Steps 1a and 1b)	Submit proposal to update the ZDHC MRSL Guidelines according to specified criteria.			X		X
Review and finalise proposals (Step 2a)	Review eligible proposals (received via town hall, hackathon and the MRSL Section in the ZDHC Submission Platform, remove duplications, identify incomplete submission and gather complete information from proposing entity through the MRSL Section in the ZDHC Submission Platform	X				
Prepare the proposed project scope (Step 2b)	Based on the proposals create a document that details the proposed project scope to the MRSL Council	X				
Take the final decision on the proposed project scope (Step 3)			X			
Seek the support of permanent groups such as ZDHC Advisory Groups or ad hoc focus groups			X			
Co-ordinate the work of any focus group as per the scope assigned by the MRSL Council (Step 3)		X				
Prepare the document that will be used to create the first draft (Step 3)			X			
Prepare the first draft (Step 4)		X				
Comment on the first draft (Steps 5a-5b)				X	X	
Prepare the final draft	Based on comments from first draft	X				
Final approval before publication			X			

---

## 3.0 Submission Process and Criteria

---

As mentioned in Section 1 of this document, a proposing entity can make a proposal for a new substance to be included in the ZDHC MRSL or suggest any changes to an existing substance in the ZDHC MRSL through the ZDHC Submission Platform along with the required data as requested in the questionnaire during the proposal process on the platform. The proposal, along with the data submitted will be reviewed for completeness by the SCM Competence Centre and forwarded to the MRSL Council for discussion and decision.

---

## 4.0 Evaluation of Submitted Proposals and Decision-Making Process

---

This is with reference to the seven steps 'Review Process' given in Figure 1. If a proposal is incomplete or questionable, the ZDHC SCM Competence Centre will contact the Proposed Entity to seek clarification and/or additional information. If no clarification or additional information can be obtained, the SCM Competence Centre and the MRSL Council members may use their own expertise and connections to complete or verify the proposal themselves. There is no guarantee that an incomplete proposal will be taken into account.

---

### 4.1 Evaluating Submitted Proposal based on the Submission Criteria

Proposals which are complete and meet the eligibility criteria will be allocated for inclusion in the guidelines update project scope drafted by SCM CC Technical Manager and discussed by the MRSL Council when preparing the final scope of the update to the ZDHC MRSL. The MRSL Council members will deliberate and discuss the proposals and suggestions for the update received through the MRSL Section in the ZDHC Submission Platform and the SCM Competence Centre and decide whether or not to include the proposals in the review based on; relevance, credibility, impact to the industry, existence of test methods and the overall strategy of ZDHC Roadmap to Zero Programme.



---

## 4.2 MRSL Council Final Decision to ZDHC

The MRSL Council uses all combined information to support their final decision. In the case of ambiguous data, the MRSL Council reserves the right to form a decision based on their experience and knowledge. The final decisions of the MRSL Council, as well as the points discussed during the process of creating the first draft, are communicated and documented to the SCM Competence Centre. The MRSL Council should develop and submit a formal written decision for each proposal that is included in the update document drafted by the SCM Competence Centre. The written decision should include a summary of reasons and justification for their decision. If the MRSL Council is not able to agree on a decision, the reasons should be summarised with both the majority and minority's opinions. The majority decision will become the official position of the MRSL Council.

---

## 4.3 Reviewing and Acting on MRSL Council Decision

After the MRSL Council conveys their final conclusions and decisions in writing to the SCM Competence Centre it is the responsibility of the SCM Competence Centre to prepare the first draft of the updated guidelines and co-ordinate and guide the consultation and review process together with the RtZ Delivery Team. The SCM Competence Centre will actively handle the feedback and comments obtained through the public consultation and ZDHC Signatories review. These reviews may be conducted by the SCM Competence Centre through calls or hackathons. Wherever relevant and required, the SCM Competence Centre may consult the MRSL Council for their input on critical feedback received and discuss the replies to be drafted by the SCM Competence Centre and Technical Writer.

---

# APPENDIX A

---

---

## Key Stakeholders in the Update Process

---

### MRSL Council

The MRSL Council is an independent group who uses an objective, science-based approach to review proposed substances.

The MRSL Council is composed of technical experts (Council members) from diverse segments of the textile, apparel, leather, and footwear industry and other significant stakeholders with relevant industry knowledge and experience such as NGOs or academia. The group has a chairperson to manage and organise the group activities. The Chairperson ensures the group reports its final decision on the ZDHC MRSL content updates.

All Council members are onboarded to ensure their understanding of the Roadmap to Zero Programme, the ZDHC MRSL ecosystem and the ZDHC Vision and Mission.

---

### ZDHC Technical Focus Groups

One or more technical focus group/s may be created based on the MRSL Council's request to support the MRSL Council's decision on one or more specific topics. The technical focus group will be co-ordinated by the ZDHC SCM Competence Centre. Any ZDHC Signatory with required experience, expertise can join the focus groups to aid in further research and expert knowledge sharing from the ground. Under specific conditions also experts that are not part of a Signatory group may be requested to join the group. The technical focus groups do not have a formal vote in the decisions made by the MRSL Council.

## ZDHC Competence Centres

The ZDHC SCM Competence Centre are responsible for various activities related to MRSL update as indicated in Figure 1. They are the reference point for the ZDHC community for any ZDHC MRSL and chemical substances related question or discussion and they play a vital role in supporting the ZDHC MRSL Council managing the MRSL update process.

## ZDHC Quality Management Team

The Quality Management Team oversees the overall update process and ensures respect of the rules defined in this ZDHC MRSL Principles and Procedures document and all the other relevant ZDHC internal policies and procedures.

# APPENDIX B

## Decision Making Guidelines for MRSL Council

### Decision making

- The MRSL Council is an independent decision-making body and their decisions, although shared with the ZDHC Committed Community for review through a draft document, shall remain the final word for inclusion in the updates to the guidelines.
- In common with the decision making process in the ZDHC Roadmap to Zero Programme and in the spirit of collaboration, the MRSL Council will strive for unanimity alignment on all decisions they are requested to make. Where a decision is not unanimously agreed and there are differing views, it is preferable to reach a decision by consensus using a 'discuss' then decide process.
- If an agreement by consensus cannot be reached, decisions can be adopted following voting, as the group itself determines appropriate – see Section on 'voting' below. It is recommended for the MRSL Council to consider the recommended meeting quorum (minimum participation) and voting processes described below for guidance on best practices.

### Quorum (Minimum participation)

- Over half of sectors should be represented in person, by teleconference or other communication equipment by which all members participating can hear each other to constitute a quorum (minimum participation).

- Where a quick decision is desirable the affirmative vote of a majority of the MRSL Council members present (assuming quorum) shall be necessary for the adoption of any MRSL Council decision.
- If a vote within a meeting fails to meet the above threshold, the Council will revert to remote voting by email and the decision will be made based on a simple majority of those sectors who vote – with the Chair having a casting vote.
- Remote voting by email, with all Council members/sectors invited to vote is the preferred voting method and will be adopted in all cases except when time pressure requires in-meeting voting.

---

## Voting

In the event that a voting process is needed to make a decision the following applies;

- Each MRSL Council sector\* is entitled to one vote.
- Voting by the MRSL Council can occur in a meeting of the group and communication by which all persons participating in the meeting are able to hear one another, and such participation shall constitute presence in person at the meeting.
- Votes during an official meeting may be registered by voice, or votes can be registered electronically.
- For remote voting by email – each sector will provide their vote by an agreed deadline to either the chair or the Competence Centre Technical Manager who will collate votes – the chair has a casting vote in the case of a draw.

Sector voting details and decisions made at voting during in-person or remote access meetings are intended to be recorded in the MRSL Section in the ZDHC Submission Platform.

---

\* Sector: A group of stakeholders within the ZDHC community; brands, suppliers, NGO, chemical suppliers, solution providers, academia, legislation.