



**Kahtoola Chemical Management Guide & Restricted Substances List (RSL)**

**Released: September 2024**



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## INTRODUCTION

Kahtoola is committed to operating its business in a sustainable manner to protect the environment, factory workers, customers, and the brand. This commitment requires that we partner with supply chain partners who can support us in ensuring these obligations.

We recognize the essential role that chemistry plays in the creation of durable, high-performance products. Therefore, Kahtoola strives to use the most benign and well-understood chemical inputs that are managed responsibly throughout the product creation process.

As part of our continuous improvement program, we created the *Kahtoola Chemical Management Guide & RSL* (called the *Guide* hereafter) which includes our most up to date Restricted Substances List (RSL).

Kahtoola's revised RSL is in alignment with the Apparel and Footwear International RSL Management (AFIRM) RSL. The complete AFIRM RSL document can be found online in 8 different languages here:

<https://afirm-group.com/afirm-rsl/>.

The AFIRM RSL assures that all suppliers/vendors doing business with Kahtoola comply with international restricted substances (RS) standards. All vendors, licensees, and suppliers of finished goods and materials to Kahtoola must meet the expectations detailed in this Guide and RSL as a prerequisite of doing business with Kahtoola.

We encourage suppliers to share these documents throughout the value chain with vendors who supply materials or components that are used in finished goods for Kahtoola.

In the spirit of partnership beyond our business, the content of this Guide is heavily aligned with industry tools and existing resources to promote convergence towards a common set of global objectives for chemical management. We will continue to update this Guide, and our chemical management program as new data and tools are available.

We sincerely appreciate your continuing partnership and your cooperation in ensuring that Kahtoola products meet the highest expectations of our customers and stakeholders. We recognize that achieving our chemical management goals is a journey of incremental progress, exploration, and collaboration.

Sincerely,

Danny Giovale

Founder & Owner of Kahtoola, Inc.

[Kahtoola.com](http://Kahtoola.com)

## CONTACT INFORMATION

If you have any questions, comments, or would like support in meeting the expectations of this guide or understanding how to use the information outlined in this Guide and RSL, please contact Betsy Harter at [betsy@kahtoola.com](mailto:betsy@kahtoola.com)

For Non-Compliance or Failure Remediation matters please reach out to [betsy@kahtoola.com](mailto:betsy@kahtoola.com) and [brad@kahtoola.com](mailto:brad@kahtoola.com).

## HIGHLIGHTS OF REVISED RSL CONTENT & SUPPLIER EXPECTATIONS

1. Kahtoola has aligned with the AFIRM RSL. This RSL contains a class of chemicals known as per- and polyfluoroalkyl substances (PFAS). To ensure compliance with divergent PFAS regulations in the USA and across international markets, Kahtoola requires that all suppliers of Kahtoola products and goods adhere to PFAS guidance of this document. In the United States, PFAS are prohibited from intentional use in manufacturing of articles, including all materials and components supplied for finished goods. A subset list of PFAS can be found on page 34 of the 2025 edition of AFIRM RSL. Note that this list is not exhaustive and all PFAS are prohibited from intentional use in Kahtoola products.
  - a. **AFIRM PFAS Phaseout Guidance** can be found here: [www.afirm-group.com/pfas-phaseout-guidance](http://www.afirm-group.com/pfas-phaseout-guidance)
    - i. Available in English, Simplified Chinese, Traditional Chinese, Vietnamese, Japanese, Indonesian, Spanish, and Turkish.
2. Kahtoola has new RSL testing requirements for compliance with the AFIRM RSL. Details are outlined below.
3. Kahtoola will routinely conduct independent 3<sup>rd</sup> party testing on finished goods to ensure compliance and/or may require certification of compliance for chemical testing from our suppliers. Regarding PFAS, all material and components supplied for use will be subject to third party testing for Total Fluorine content, with a detection limit of 20ppm.
4. Suppliers will be expected to keep an updated Chemical Inventory List (CIL) and provide Kahtoola with known chemical information upon request. Due Diligence in obtaining this information is expected to report information not readily available. Guidance on how to create a CIL can be found below.
5. Kahtoola is ramping up efforts in supply chain transparency.
6. Kahtoola will be conducting Material Supplier Surveys and will be working with suppliers to understand sustainability and social metrics.

## SUPPLIER RESPONSIBILITIES

Kahtoola is committed to the use of safer and better-understood chemical options. We are also committed to providing the necessary support and tools to our supply chain partners to ensure that chemicals are managed responsibly throughout their entire life cycle and that workers and the surrounding environment are protected from any unnecessary risk. Please see the Tools and Resources page at the end of this Guide for supporting documents and links.

- ❖ **Review the Kahtoola Chemical Management Guide and AFIRM RSL annually.**
- ❖ **Inform material suppliers and sub-contractors of relevant requirements and expectations.**
  - In Kahtoola's commitment to operate our business in a sustainable manner to protect the environment, factory workers, customers, and the brand, Kahtoola strongly encourages suppliers to share this Guide throughout the value chain. For suppliers who are responsible for chemical formulations in cleaners, adhesives, paints, inks, detergents, dyes, colorants, auxiliaries, coatings and finishing agents used in raw material production, wet processing, process machinery maintenance, wastewater treatment, sanitation, and pest control, please refer to the Zero Discharge of Hazardous Chemicals (ZDHC) MRSL. A link to the ZDHC MRSL can be found here: <https://mrsl.roadmaptozero.com/>. The ZDHC MRSL goes beyond the traditional approaches to chemical restrictions, which apply to finished products (Restricted Substances List - RSL). The MRSL approach also helps protect workers, local communities, and the environment

from the possible impacts of harmful chemicals. The ZDHC MRSR does not replace AFIRM RSL for restrictions on chemicals in materials or finished products.

- ❖ **Develop a Chemical Management System (CMS) which includes an independent process for ensuring compliance with this Guide & RSL and all legal requirements.**
- ❖ **Maintain and regularly update an on-site chemical inventory list (CIL) and a valid chemical Safety Data Sheet (SDS) for each processing chemical stored and used on-site.**
  - A chemicals safety data sheet (SDS) must be dated from the past three (3) years and contain sections of information such as chemical name, chemical properties, chemical composition, potential health and environmental hazards, identification, recommended first aid measures, and proper handling, storage, and transportation of chemicals.
- ❖ **Upon request, suppliers will disclose the identity and use of chemicals used in products manufactured for Kahtoola.**
  - Suppliers must maintain a **Chemical Inventory List (CIL)** that includes all processing chemicals present on-site for the manufacture of Kahtoola products. A factory's CIL should be maintained by a designated person and be updated at least once every six (6) months. At a minimum, the CIL should include the following information for each chemical kept on site:
    1. Chemical product name (common or trade name)
    2. Chemical supplier (name, location, contact person)
    3. Primary use (e.g., dye, flame retardant)
    4. Chemical ingredients (names, CAS numbers, percentage contents)
    5. Chemical identity
    6. Quantity on site
    7. Relevant certification numbers, where applicable (i.e., OEKO-TEX, bluesign, etc.).
- ❖ **Clearly post information about hazards associated with each chemical and chemical formulation in storage and use areas.**
- ❖ **Provide staff with appropriate training and protective equipment to prevent chemical exposure.**
- ❖ **RSL Compliance**
  - Suppliers of materials and products are responsible to comply with the AFIRM RSL and all its requirements, restrictions, limits, and bans. Kahtoola suppliers are responsible for choosing chemicals and application processes for materials and products and so are obligated to ensure that materials and products comply with this Guide and AFIRM RSL. Testing is a tool that can be used to ensure compliance throughout the supply chain but is not a requirement for every component/material.

Kahtoola expects suppliers to test materials and products to the AFIRM RSL upon request. Kahtoola's goal is to eliminate the introduction of banned chemicals from the earliest stages of manufacturing and processing, and to adhere to the limits set forth in the AFIRM RSL for all restricted substances.

Material, component, and product testing may be requested by Kahtoola at any stage of manufacturing to demonstrate compliance with this document's requirements. The limits and restrictions in the AFIRM RSL must be applied for each individual component of an intermediate or finished article. A component is each part of an article that can be distinguished according to the material composition and/or functionality and/or color and is easily separated mechanically from other components.

Upon request, Kahtoola expects suppliers to provide proof of compliance through voluntary testing reports, material certifications, composition reports, or other similar means of

verification to ensure compliance with the AFIRM RSL. Kahtoola reserves the right to accept or deny any submitted proof of compliance. Should any proof of compliance be deemed unacceptable, Kahtoola will communicate this to the supplier and request follow up with a list of acceptable options. Additionally, Kahtoola intends for testing or proof of/certification of compliance to be done on components prior to the assembly of articles. Only in cases where this is not feasible will articles be deconstructed to test the components.

Suppliers are encouraged to use AFIRM RSL, and other Tools and Resources provided in this Guide as a reference during development and run voluntary tests on materials as applicable.

**Kahtoola pays for required testing**

Testing of finished products for RSL compliance may be random or part of Kahtoola’s seasonal RSL testing program, and would be conducted at Kahtoola’s expense, unless the testing is in direct response to an identified RSL or regulatory compliance violation, in which case, the testing will be at the supplier’s expense and must be done at a laboratory approved by Kahtoola. In this case, approved testing labs and pricing information will be provided to suppliers.

**Testing is not required on all materials.** Kahtoola will request RSL testing for select materials based on risk analysis. The risk analysis considers product type, material type, manufacturing processes, color, production volume, market exposure, and other factors. Information on risk analysis used by Kahtoola can be found on pages 12-14 of the 2025 AFIRM RSL.

**Existing Test Reports:** If a material requested for RSL testing has been tested in the past year, you may provide the applicable test report to Kahtoola for review. Kahtoola will determine and advise whether the report can be accepted in lieu of additional testing.

Suppliers should also notify Kahtoola if any components or products no longer meet the requirements of the RSL and provide a plan for remediating the included chemical. See Non-Compliance Resolution information below on page 8.

❖ **Upon request, provide Kahtoola with existing compliance documentation or laboratory test results within 5 business days of receiving the request.**

If additional time is needed, Kahtoola expects timely communication to create a reasonable timeline to accommodate the request.

❖ **Adhere to all applicable legal requirements, regardless of whether those requirements are captured in this document.**

Kahtoola requires all vendors and suppliers of materials and components to adhere to local and international laws and regulations around chemical management. Please refer to the “Key Legislative Priorities” section below for legal requirements most applicable to Kahtoola. Note that this is not an exhaustive list, and Kahtoola expects suppliers to adhere to all laws and regulations around chemical management regardless of their inclusion in this document. Guidance on global laws and chemical regulations can be found in 5 different languages here: [https://www.aafaglobal.org/AAFA/Solutions\\_Pages/Restricted\\_Substance\\_List](https://www.aafaglobal.org/AAFA/Solutions_Pages/Restricted_Substance_List)

❖ **Supplier Declarations of Conformity**

All suppliers must carefully review the Key Legislative Priorities section beginning on pg. 5 to determine what declarations they will be responsible for providing to Kahtoola. It is important to note that raw material, component, and finished goods suppliers will all be responsible for providing signed declaration(s) depending on the end use of the materials, components and finished goods being supplied.

❖ **Upon request, disclose the contact information for upstream suppliers and sub-contractors used to make Kahtoola materials and products.**

Kahtoola is ramping up efforts to increase transparency in our supply chain- from raw materials to finished goods. The goal of supply chain visibility is to better understand our environmental and social impacts. Among other things, Kahtoola sees this as an opportunity to build lasting relationships with our suppliers, minimize supply chain disruptions, and build in climate resiliency across the value chain. Kahtoola recognizes that this is a journey of incremental progress, exploration, and collaboration with our suppliers.

**Upon request, complete and return a Material Supplier Survey**

**Complete and return the Chemical Compliance Declaration Forms provided at the end of this Guide.**

**Complete and return provided RSL Acknowledgement of Receipt and Understanding as confirmation of accepting these terms and conditions.**

## **KEY LEGISLATIVE PRIORITIES**

### **UNITED STATES**

#### **California Proposition 65**

The California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65), requires manufacturers and businesses to label products that contain one or more substance(s) known to the state of California to cause cancer, birth defects, or other reproductive harm. Consumers may initiate legal action against a manufacturer or business that fails to provide such a warning.

The Proposition 65 list of chemicals requiring product labeling, as well as additional information, can be found on the [California Office of Environmental Health Hazard Assessment Website](#).

Suppliers must inform Kahtoola if any of the chemicals on this list are intentionally added to or may be present as contaminants in Kahtoola products or product components. This rule applies to raw materials, components, and finished goods. If any chemicals in this list are indeed present in any raw materials, components, or finished goods provided to Kahtoola, it is the suppliers responsibility to fill out the California Proposition 65 Declaration form provided at the end of this Guide and submit to Kahtoola.

#### **State Chemical Reporting Regulations**

Some US states, like Maine, New York, and California, require manufacturers or importers of goods to notify relevant authorities of the presence of certain chemicals in products. Kahtoola may need to work with Suppliers to understand if any of the chemicals noted in these state and federal regulations are intentionally added to or may be present as contaminants in Kahtoola products or product components. Kahtoola expects that suppliers to cooperate in obtaining this information when requested. Please note that the states listed above are not inclusive of all applicable state reporting requirements.

#### **Toxic Substance Control Act (TSCA)**

Due to new US federal regulatory enforcement around per-and polyfluoroalkyl substances in the USA in 2025, Kahtoola will be forced to report PFAS found in our products dating back to Jan 1, 2011. This new rule set forth by the Environmental Protection Agency (EPA) is called the Toxic Substances Control Act (TSCA) and will require that we work closely with our suppliers to gather relevant information. Cooperation with and by our suppliers will be integral to achieving reporting obligations. Kahtoola will contact suppliers to ascertain this information and provide relevant guidance. A TSCA PFAS chemical list can be found here: <https://comptox.epa.gov/dashboard/chemical-lists/epapfasinv>.

A link to the EPA's PFAS home page can be found here: <https://www.epa.gov/pfas>. The information provided here is intended to explain some of the important background information needed to understand the details of specific actions EPA takes to address PFAS, and other emerging events related to PFAS.

### **EUEOPEAN UNION**

#### **REACH Substances of Very High Concern (SVHC)**

Based on scientific evidence indicating potential hazards to human health or the environment, the European Commission (EC) and European Union (EU) member states propose Substances of Very High Concern (SVHCs) for placement on the European Chemicals Agency (ECHA) "Candidate List of Substances of Very High Concern for Authorization."

Placing a substance on the Candidate List triggers specific obligations for importers, producers, and suppliers of any article that contains one or more of these substances above 0.1 percent by weight per component. The obligations include providing sufficient information to allow safe use of the article to brand and retail customers or, upon request, to a consumer within 45 days of receipt of the request.

The identification of a substance as a SVHC and its inclusion in the Candidate List can trigger certain legal obligations for importers, producers and suppliers of an article that contains such a substance.

Note: REACH defines an article as "an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition."

ECHA periodically updates the Candidate List; find the most current version at: <https://www.hse.gov.uk/reach/candidate-list.htm>

For a complete list of chemicals authorized under REACH as substances of very high concern please follow this link: <https://www.echa.europa.eu/candidate-list-table>.

Note: The European Chemicals Agency (ECHA) has updated their initial restriction proposal. The most recent proposal for Per- and Polyfluoroalkyl substances (PFAS) restrictions was published on 20 August 2025 (linked below). ECHA has proposed PFAS to be restricted under REACH and as of the date of this Guide are still being reviewed by the EU's chemical regulations agencies. Kahtoola will be watching closely for the next steps to understand how these restrictions will apply to our products and business. A link to ECHA's information on PFAS can be found here: <http://echa.europa.eu/hot-topics/perfluoroalkyl-chmiclas-pfas>.

## NONCOMPLIANCE RESOLUTION

Suppliers must strive to ensure that all products and material produced for Kahtoola meet the limit values in the AFIRM RSL. Testing and certifications are done to confirm or prove compliance. In the case that any RSL testing results fail to comply with the AFIRM RSL limits, the supplier should immediately quarantine the sample and notify Kahtoola of the failed test result and complete the RSL Noncompliance Resolution Form provided in this Guide. Kahtoola reserves the right to decide on the steps to be taken towards resolution and the deadlines by which they must be completed.

Kahtoola reserves the right to refuse to purchase any components or products that are deemed at risk of noncompliance with AFIRM RSL, based on Kahtoola's discretion. Any costs of noncompliance resolution will be the responsibility of the supplier. This includes but is not limited to:

- Additional testing
- Product or material replacement
- Shipping fees for return and replacement of products or materials

Suppliers must provide a root-cause analysis for any restricted substances detected above the limit values in the AFIRM RSL, along with an explanation of actions to correct any non-compliance with the RSL.

The Noncompliance Resolution Form provided in this Guide can be emailed to [betsy@kahtoola.com](mailto:betsy@kahtoola.com) and [brad@kahtoola.com](mailto:brad@kahtoola.com).

## SPECIAL CASES AND HIGH-RISK MATERIALS

Some materials, due to the nature of their chemistries, have a significantly higher risk of containing chemicals of concern. Supplier must notify Kahtoola of each case, and receive explicit approval from Kahtoola prior to the development of a new material for these cases:

- Water repellents (DWR) and stain repellents
- Wrinkle-free finishes and durable-press finishes
- Polyvinyl chloride (PVC) and polyvinylidene chloride (PVDC)
- Acrylic fiber
- Nano-scale materials and structures
- Regenerated cellulosic fibers and regenerated protein fibers

- Biocides and antimicrobials
- Bug repellents and insecticides
- Flame retardants and fire-retardants
- Leather and synthetic leather

## PRIORITY CHEMICALS OF CONCERN

Kahtoola continuously examines the chemicals used in our supply chain and prioritizes potentially hazardous substances for elimination or replacement where safer, effective alternatives exist. The following is an overview of the chemicals and chemical classes that Kahtoola has identified as top priority for elimination or replacement:

- **Antimicrobials & biocides:** Odor management in textiles and foams is commonly achieved by application of antimicrobial and biocidal finishes. The health and environmental impacts of many of these finishes are not thoroughly understood. Should we use odor management in any of our product lines, we will be selective in our application of odor control finishes and use only bluesign® certified options to ensure treatments have undergone evaluation for toxicity and efficacy.
- **Flame retardant (FR) chemicals:** FR chemicals are used to comply with flammability requirements. Certain FR chemicals introduce hazards to people and the environment. We are committed to eliminating FR chemicals where they are unnecessary and partnering with standard setting organizations and regulators to reform outdated flammability requirements. Where FR chemicals are demonstrated to be required to achieve regulatory compliance, we work with our suppliers to select the best alternatives.
- **Per- and Polyfluoroalkyl Substances (PFAS):** For many years, PFAS-based chemistry has been used in DWR finishes for performance textiles and other applications, due to its durability and performance benefits. Due to the changing regulatory landscape, shifts in consumer preferences, and increased availability of alternative technologies, Kahtoola has made a full transition away from the use of PFAS. Kahtoola has also developed a test plan that directly addresses PFAS and has applied in our seasonal testing regime starting with the Fall 2023 product season. Suppliers may contact Kahtoola for a copy of the test plan if they plan to conduct their own compliance checks during product development or redevelopment stages under their CMS (chemical management system). Additionally, Kahtoola will continue to avoid the application of water repellent chemicals where they are not needed to provide a performance benefit, and we continue to explore PFAS-free alternatives for apparel and gear.
- **Polyvinyl chloride (PVC):** PVC is prohibited from use in Kahtoola products due to high potential for hazardous impacts during product manufacturing and use.
- **Solvents of high concern:** Solvents are a diverse group of chemicals with many uses throughout manufacturing, from equipment cleaning to textile lamination. Certain solvents are classified as carcinogenic, mutagenic and reprotoxic (CMR). Kahtoola is requesting that our suppliers review, limit, and phase out CMR solvents. To support our goal to eliminate CMR solvents, Kahtoola is pursuing water-based coatings, alternative cleaning agents for equipment and material preparation, and training of factory workers around proper chemical selection, handling, and disposal. Suppliers can find preferred, RSL compliant chemicals through the bluesign® FINDER chemical database. This resource is open-sourced and available at <https://bluesignfinder.com/>.

The following chemicals are of particular concern in the materials used to make **hard good products**. As a result, Kahtoola has elevated expectations for how these chemicals are managed in the manufacturing process of our hard goods. Products containing these chemicals are regulated in some or all U.S. states. Notify Kahtoola immediately if a component is known or suspected to contain any of the following substances:

- **Lead-** Lead is a powerful toxin to the brain and nervous system. Cast metals and brass have a higher risk of containing lead. Kahtoola will only accept “low lead”, or NO lead metal options.
- **Other heavy metals (cadmium, nickel, chromium, mercury, etc.)-** Metal parts and coatings may contain heavy metals that pose health risks to workers, product users and the environment.

- **Phthalates (plasticizers)**- Certain phthalates, also referred to as plasticizers because of their use to make plastics more flexible, have negative effects on the reproductive system. Plastic components should be tested for phthalates. PVC should be avoided whenever possible.
- **BPA (Bisphenol A)**- Plastic components should be tested for BPA, which should not be intentionally used in manufacturing of products.

## TOOLS & RESOURCES

The information found in this Guide will aid suppliers in the advancement of chemical management best practices. The documents contained herein serve as tools to aid individuals responsible for environmental compliance throughout the supply chain to become more aware of restricted substances around the globe.

Kahtoola provides the following tools and resources to guide our suppliers towards global compliance regarding restricted chemicals. It is our intention to ensure best practices along the value chain when manufacturing Kahtoola products. Kahtoola intends to support our suppliers in achieving compliance and recognizes that this takes time and a collaborative working relationship. We encourage our suppliers to reach out with any questions or concerns. In addition, Kahtoola expects that this information be shared with all vendors, licensees, and suppliers of finished goods and materials to Kahtoola.

1. The complete and up to date **AFIRM RSL** document can be found online in 8 different languages here: <https://afirm-group.com/afirm-rsl/>.
2. AFIRM PFAS Phase Out Guidance can be found here: [https://afirm-group.com/wp-content/uploads/2023/09/AFIRM\\_Phaseout\\_PFAS\\_2023\\_0831.pdf](https://afirm-group.com/wp-content/uploads/2023/09/AFIRM_Phaseout_PFAS_2023_0831.pdf)
3. American Apparel and Footwear Association guidance on global laws and chemical regulations can be found in 5 different languages here: [https://www.aafaglobal.org/AAFA/Solutions\\_Pages/Restricted\\_Substance\\_List.aspx](https://www.aafaglobal.org/AAFA/Solutions_Pages/Restricted_Substance_List.aspx)
4. California Prop65 chemical list: <https://oehha.ca.gov/proposition-65/proposition-65-list>
5. California Prop65 list of chemicals requiring labeling: <https://oehha.ca.gov/proposition-65>

A resource to find RSL compliant chemicals is bluesign® FINDER: <https://bluesignfinder.com/>

6. United States Environmental Protection Agency (EPA) information on PFAS: <https://www.epa.gov/pfas>.
7. Zero Discharge of Hazardous Chemicals (ZDHC) MRSL: <https://mrsl.roadmaptozero.com/>
8. European Chemicals Agency (ECHA) Candidate List of Substances of Very High Concern: <https://echa.europa.eu/candidate-list-table>
9. European Chemicals Agency (ECHA) information on PFAS: <http://echa.europa.eu/hot-topics/perfluoroalkyl-chemicals-pfas>.

## Appendix

### Chemical Compliance Declarations Forms

- i. REACH Declaration & ANNEX XVII Declaration
  - ii. California Proposition 65 Declaration
  - iii. United States EPA Toxic Substance Control Act - Per- and Polyfluoroalkyl Substances (PFAS) Declaration
- B. Noncompliance Remediation Form
  - C. AFIRM RSL Testing Matrix
  - D. Kahtoola Supplier Compliance Acknowledgement Form



## REACH Declaration & ANNEX XVII Declaration

**Product Name:**

**Product Description:**

**Color(s):**

This product does not contain any chemicals on the REACH SVHC List.

This product contains chemical(s) that appear on the REACH SVHC List. This is a chemical that was intentionally added to the product during the manufacturing process and creates the possibility of exposure to a consumer. Please refer to: <https://echa.europa.eu/candidate-list-table>.

Please provide below the chemical in your product:

Chemical Name	CAS Number/ ES Number	Concentration	Do you have an exposure report?

### Declaration of Conformity for Substances or Preparations Provided – REACH Annex XVII

This product does not contain any chemicals on the REACH Annex XVII List.

This product contains chemical(s) that appear on the REACH Annex XVII List. This is a chemical that was intentionally added to the product during the manufacturing process and creates the possibility of exposure to a consumer. Please refer to: <http://echa.europa.eu/substances-restricted-under-reach>

Chemical Name	CAS Number/ ES Number	Concentration	Entry Number

I certify that the above information is to the best of my knowledge true, correct, and complete.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Job Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Company

\_\_\_\_\_  
Date

Please email to [betsy@kahtoola.com](mailto:betsy@kahtoola.com) and cc [brad@kahtoola.com](mailto:brad@kahtoola.com)



## California Proposition 65 Declaration

**Product Name:**

**Product Description:**

**Color(s):**

This product does not contain any chemicals on the California Proposition 65 List.

This product contains chemical(s) that appear on the California Proposition 65 List. This is a chemical that was intentionally added to the product during the manufacturing process and creates the possibility of exposure to a consumer. Please refer to: <https://oehha.ca.gov/proposition-65/proposition-65-list>.

Please provide below the chemical in your product:

Chemical Name	CAS Number/ ES Number	Concentration	Do you have an exposure report?

\*If your product contains a chemical on the list but is added at a di Minimis value below the amount deemed acceptable by the State of California, please provide your explanation below.


\*\*If you have an exposure report please provide.

I certify that the above information is to the best of my knowledge true, correct, and complete.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Job Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Company

\_\_\_\_\_  
Date

Please email to [betsy@kahtoola.com](mailto:betsy@kahtoola.com) and cc [brad@kahtoola.com](mailto:brad@kahtoola.com)



**United States EPA Toxic Substance Control Act  
Per- and Polyfluoroalkyl Substances (PFAS) Declaration**

**Product Name:**

**Product Description:**

**Color(s):**

This product does not contain any chemicals on the USA TSCA/EPA PFAS Chemical Inventory List.

This product contains chemical(s) that appear on the USA TSCA/EPA PFAS Chemical Inventory List. This is a chemical that was intentionally added to the product during the manufacturing process and creates the possibility of exposure to a consumer. Please refer to: <https://comptox.epa.gov/dashboard/chemical-lists/epapfasinv>.

Please provide below the chemical in your product:

Chemical Name	CAS Number/ ES Number	Concentration	Do you have an exposure report?

\*If your product contains a chemical on the list but is added at a di Minimis value below the amount deemed acceptable by the EPA (Environmental Protection Agency), please provide your explanation below.


\*\*If you have an exposure report please provide.

I certify that the above information is to the best of my knowledge true, correct, and complete.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Job Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Company

\_\_\_\_\_  
Date

Please email to [betsy@kahtoola.com](mailto:betsy@kahtoola.com) and cc [brad@kahtoola.com](mailto:brad@kahtoola.com)



## RSL (Restricted Substance List) Noncompliance Remediation Form

This form initiates a Corrective Action Plan (CAP) for a restricted substance failure in a raw material *or* finished product. Kahtoola staff, the material supplier, and/or product manufacturer will provide the below information, as appropriate.

**All corrective actions must be approved by Kahtoola prior to action. Submit completed form to [betsy@kahtoola.com](mailto:betsy@kahtoola.com).**

**Part 1: RSL Failure Details** *(to be completed by Kahtoola staff); see attached test report(s)*

Restricted substance(s) (name & CAS):	
Detection level (ppm):	
Kahtoola limit (ppm):	
Test method:	
Test lab:	
Technical report #:	
Test Report Form (TRF) #:	

**Part 2: Material Details** *(to be completed by Kahtoola staff)*

Kahtoola Article #/s:	
Supplier Article #/s:	
Material description	
Material content:	
Material supplier:	
Colors affected:	

**Part 3: Product Information for styles impacted by this failure** *(to be completed by the supplier)*

Style/s:	
Season/s:	
Number of units with failure:	

**Part 4: Manufacturing Information impacted by this failure** *(to be completed by the product vendor)*

How many yards/units ordered?	
How many yards received?	
Semi-finished products on-site or yards of fabric in use?	
How many finished products on-site:	
How many products shipped:	

**Part 5: Root Cause Analysis** *(to be completed by the supplier)*

What is the source of the RS failure? <i>(please list the chemical product)</i>	
Has source been confirmed by review of SDS, chemical test or other?	
Why was the chemical being used?	
What other Kahtoola materials may be contaminated?	
Other explanation:	

**Part 6: Proposed Corrective Actions by Supplier** *(to be completed by the Supplier)*

May include raw chemical testing, material re-testing, stopping production, sourcing alternatives, etc.

Describe proposed corrective actions	Person in Charge	Due Date	Comments


**Part 7: Disposition** (to be completed by Kahtoola staff after reviewing relevant information)


**Part 8: Corrective Actions by Kahtoola** (to be completed by Kahtoola staff)

	Steps of Corrective Action	Person in Charge	Due date	Comments
1.				
2..				
3.				
4.				

Attach additional pages as needed.

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**Part 9: Corrective Actions Agreement** (to be completed once corrective actions are finalized)

<b>Kahtoola staff:</b>		<b>Supplier:</b>	
<b>Signature:</b>		<b>Signature:</b>	
<b>Date signed:</b>		<b>Date signed:</b>	

Please email to [betsy@kahtoola.com](mailto:betsy@kahtoola.com) and cc [brad@kahtoola.com](mailto:brad@kahtoola.com)

## AFIRM RSL Testing Matrix

In 2020, AFIRM redefined the recommended testing approach included in the RSL.

In previous years, AFIRM published a Risk Matrix, which gave guidance on risks for each listed substance or class of substances in different materials.

The Testing Matrix is a more prescriptive approach to help brands and suppliers effectively manage chemical risks by adopting a common testing approach for use and acceptance across different brands. Chemicals assigned a Level 1 in materials should be viewed as the minimum amount of testing required to satisfy AFIRM member requirements, and chemicals assigned a Level 2 are recommended for additional testing and may be required at brand discretion. Regular and self-governed testing of all relevant substances by suppliers will help to ensure the widest acceptance of third-party test reports by international brands.

The Testing Matrix was developed by AFIRM brands utilizing multiple sources of information, including industry RSL testing information, a broad understanding of global supply chain operations, and from nearly two decades of managing restricted substances across a wide range of materials.

The Testing Matrix uses the following color codes:

- 1 **Red = Higher risk.** Testing required.
- 2 **Orange = Lower risk.** Testing recommended and may be required at brand discretion.
- Blank = Lowest risk.** Not anticipated in material.

Refer to footnotes for material-specific testing recommendations and exceptions.

Suppliers must check with their brand customers to understand if they will accept test reports according to this AFIRM Testing Matrix. Individual brand testing programs, to the extent they are different, supersede the AFIRM RSL Testing Matrix unless a brand indicates otherwise.

It is a goal of the AFIRM Group to reduce the testing burden on suppliers and streamline the RSL testing approach, while further reducing risk of restricted substances in materials and products. As brands adopt the AFIRM Testing Matrix into their RSL process, suppliers and AFIRM brands will be able to share test reports and data more easily, reducing the need for multiple RSL test submissions to satisfy different RSL requirements.

## Determining Test Methods Using the AFIRM RSL Testing Matrix

The test methods listed in the RSL for specific materials correspond to the AFIRM RSL Testing Matrix.

A blank color code for any material will not have a corresponding test method.

For example, Metal has a blank color code for APEOs and therefore no test method is listed for APEOs for Metal in the RSL.

If the RSL states "All Materials" or "All Materials Except," this means the test method is applicable to all materials listed with a color of 1 or 2 that do not have a specific test method listed.

AFIRM recommends consulting your testing laboratory to determine the best test method for any material not currently listed in this document.



Table 4. AFIRM RSL Testing Matrix

NOTE: For recycled materials, additional testing may be required at Level 1; check with each brand on requirements.

Substance	Natural Fibers	Synthetic Fibers	Natural & Synthetic Blends	Synthetic Coated Fabrics	Natural Leather & Fur Skin	Natural Materials	Metals	Other: Porcelain, Ceramic, Glass, Crystal, Etc.	Feathers & Down	Polymers							Coatings & Prints	Glue		
										EVA	PU Foams	All other PU & TPU	Rubber Excludes Latex and Silicon Rubbers	Polycarbonate	ABS	PVC			All Other Foams, Plastics & Polymers	
Acetophenone and 2-Phenyl-2-Propanol										2										
Acidic and Alkaline Substances (pH)	1	1	1	1	1															
Alkylphenol (AP) and Alkylphenol Ethoxylates (APEOs), including all isomers	1	1	1	1	1	1			1	1	1	1	1	1	1	1	1	1	1	
Azo-amines and Aryl Amine salts	1A	1A	1A	1A	1A	1A			1A										1	
Bisphenols		1	1	1	1					2	2	2	2	1	2	2	2			
Chlorinated Paraffins				2J	1					2	2	1	1	2	2	1	2			
Chlorophenols	2	2	2		2															
Chlorinated Benzenes and Toluenes		2	2	2																
Dimethylfumarate (DMFu)						2														
Dyes, Forbidden and Disperse		1A	1A	1A															2	
Dyes, Navy Blue		2	2																	
Flame Retardants	2B																			
Fluorinated Greenhouse Gases																				
Formaldehyde	1	1	1	2	1	1C							2						1	1

A Level 1 for dyed/colored materials (non-white) only.  
 B Level 2 only if Flame Retardant use or contamination is suspected.  
 C Level 1 for Wood, Paper, and Straw materials only.

D Level 2 for Wool materials only.  
 E Level 2 if extractable Chrome above 1 ppm only.  
 F Copper is exempt from restriction limits in Metal parts.  
 G Level 2 for plant-based fibers only; N/A for animal-based fibers.

H Level 1 for Cadmium and Lead only; Crystal is exempt for Lead.  
 I Level 1 for PVC materials only. Otherwise, Level 2.  
 K Level 2 for Styrene/Butadiene Rubbers (SBRs) only.

L Level 1 if PFAS use or contamination is suspected.  
 M Level 1 if Rubber or black Polymeric materials, otherwise Level 2.  
 N Level 1 for PU and PVC-based materials only.