

What requirements should footwear comply with to be allowed on the European market?

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The most important legal requirement for footwear exporters targeting Europe is to make sure your product complies with Europe's extensive legislation on chemicals. Labelling rules are also gaining importance. If you use materials from endangered plants or animals, make sure you comply with the rules of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Animal welfare is one of a growing number of sustainability issues gaining importance in the leather and textiles industries. Fair wages, better working conditions and safer buildings are also hot topics.

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1. Which requirements must my product comply with?

If you export footwear to Europe you have to comply with the following legally binding requirements:

Product safety

The General Product Safety Directive basically states that all products marketed in Europe must be safe to use. It forms a framework for all specific legislation established for specific products and issues. If no specific legal requirements have been established for your product and its uses, the General Product Safety Directive still applies.

If specific requirements apply to you, the General Product Safety Directive applies in addition, covering all safety aspects which may not have been described specifically.

Tips:

- Read up on the [General Product Safety Directive in the EU Export Helpdesk](#). Study the specific legal requirements listed here.
- Use your common sense to ensure your product is not easily breakable, does not have sharp edges or cause any other danger in its normal use. These aspects may not be outlined in specific legislation, but are covered in the General Product Safety Directive.
- In practice, European buyers often provide supplier manuals in which all buyer requirements (legal and non-legal) are described.
- Check the [RAPEX database](#) used by European Union Member States to exchange information on unsafe products, to get an idea of possible incompliances.
- Check for specific requirements provided by your buyer. Some will just ask for compliance with European legislation (and let you find out for yourself what these requirements exactly are) while

others, for example, provide information which specific substances are not allowed.

Chemicals - restricted substances

There are restrictions on a great number of chemicals marketed in Europe, because they can pose a hazard to people or the environment. These restrictions are seen as the most difficult legislative requirements you will face as a producer. Footwear often consists of small parts of different materials, and volumes are often not that big, compared to the garments industry, which faces the same requirements. This makes it difficult for producers to assure that all parts comply with the set restrictions.

Most restrictions are listed in the so-called [Registration, Evaluation, Authorisation and Restriction of Chemicals \(REACH\) regulation](#) (Regulation (EC) 1907/2006). Which chemicals are of relevance for you will depend on your specific product and the material you use.

Tips:

- Familiarise yourself with the full list of restricted substances in products marketed in Europe by checking out [restricted chemicals in textile and leather products in the EU Export Helpdesk](#).
- Many European buyers provide their suppliers with a 'Restricted Substances List' (RSL). To obtain an idea of what these RSLs look like, check the Internet. Search for 'RSL' along with the name of a major brand and you will probably find a link to the RSL of that brand.
- Note that buyers sometimes impose requirements that are stricter than the legal ones. For example, you might be required to comply with the [RSL of the German shoe institute \(CADS\)](#).
- Check [CBI's document on REACH](#) to determine in which way you are affected by REACH.
- Make sure your suppliers are aware of the requirements on chemicals as well, certainly if you source parts of your products from other producers.
- Before you start testing, conduct some research on the testing laboratory you will assign. Costs may vary across testing laboratories, and you should verify that the lab is accepted by your buyer. Examples of testing laboratories include [SGS](#), [Intertek](#) and [TUV](#). Also make sure you know exactly which costs are involved. For example, some buyers have their products tested on their own and pay for the tests themselves. If they are found to be in non-compliance, however, the suppliers will be required to pay for all subsequent tests.
- Note that non-governmental organisations and consumers are showing more interest in the issue of chemicals in footwear. This may lead to buyer requirements that are even stricter than the legislative requirements. Check the section below on additional requirements, particularly the information about the Greenpeace campaign.

Examples of restricted substances relevant for footwear:

- *Azo dyes* (Leather and textile): if you use dyed leather, make sure your product does not contain any azo dyes that release any of the 22 aromatic amines which are prohibited. Check this [list of prohibited azo dyes](#) to learn more. European laws list the aromatic amines, not the azo dyes that release them. Most azo dyes are therefore legally acceptable. Moreover, most reputable dye manufacturers only produce legally accepted dyes. However, border rejections and market withdrawals do show that azo dyes can still cause problems on the European market.
- *Chromium VI* (leather): the use of Chromium VI is restricted in Europe since May 1, 2015. Several countries and buyers banned the use of Chromium VI earlier. The list of shoes withdrawn from the market in the [RAPEX database](#) reveals that Chromium VI has been the most common reason for withdrawal for a while. European law limits the use of chromium in leather products to max. 3 ppm. This [TUV article on the restriction of Chromium VI](#) outlines the main points of the legislation.
- *Organostannic compounds* (especially parts made of polyvinyl chloride, or PVC): if you use PVC in your

products, know that organotin compounds are also restricted. Organotin compounds, Dioctyltin (DOT) compounds and Dibutyltin (DBT) compounds can be used in textiles, for example in prints. Their use is restricted as they can pose a risk to human health, suppressing the immune system or damaging reproduction.

- PVC also contains other chemicals for stabilising or plasticising purposes, such as *lead* or *phthalates*. These substances are often subject to restrictions. Although PVC itself is not prohibited, some companies have voluntarily decided to phase out PVC in their products.
 - Metal parts and accessories (such as zippers or buttons) coming into direct and prolonged contact with the skin should not release more 0.5 µg/cm² *nickel* per week.
 - *Perfluorooctane sulphonate* (PFOS) is a substance used to make leather (and textiles) resistant to water and dirt. It is a persistent organic pollutant (POP) and its use is restricted in Europe according to [Regulation \(EC\) No. 850/2004](#) (Stockholm Convention). The maximum limit for PFOS is 1 µg/sqm.
- Restrictions on the use of short-chain chlorinated paraffins (SCCPs) are another common reason for recalls. These substances are also persistent organic pollutants that are often used in the leather industry.

Tips:

- Set up your own lab to test all materials you buy locally. Set up tests for physical properties, such as adhesion and abrasion, as well as chemical tests.
- Make sure your products do not contain any of the azo dyes that release the forbidden aromatic amines. This includes checking your suppliers. To test your products, use the official tests. You can find such tests on the [website](#) of the European Committee for Standardization (CEN).
- CEN Leather: [CEN ISO/TS 17234:2003](#) is a document that specifies a method for detecting the use of certain azo colourants in leather that may release aromatic amines.
- CEN Textiles: EN 14362:2003 or [EN 14362-1:2012](#) outlines methods for the determination of certain aromatic amines derived from azo-colourants in textiles.
- Follow new developments in the field of flame retardants, for example by checking the [European Flame Retardants Association \(EFRA\)](#) website.
- Check the [EU Export Helpdesk information on the restrictions of PVC](#).
- Check your buyers' requirements regarding PVC and consider phasing out PVC, since it may become unwanted by buyers anyway.
- Verify your compliance with the Chromium VI restriction using this test [EN ISO 17075](#).
- Watch [this 4-minute video on the use of persistent organic pollutants](#) in textiles (such as PFOS and SCCPs in textiles).
- Read this [information on European policy regarding restrictions on the use of POPs](#).
- Note that, some European countries have additional or stricter national restrictions on chemical substances. For example, some countries are tough on formaldehyde in textiles (Austria, Germany, Finland and the Netherlands), others on phencyclidine, or PCP, in textiles (Austria, Denmark, Germany, the Netherlands) and others on disperse dyes in textiles (Germany). To find out more, contact the [European Chemicals Agency Helpdesk](#) (ECHA) or national agencies in Europe.

Labelling of footwear

All footwear must have labels giving information on the main materials used in the shoe. The labelling must describe the materials of the three main parts of the footwear (the upper, the lining and sock, and the outer sole). For each of these, your label must indicate whether the material is "leather", "coated leather", "textile" or "other". You can provide this information in words or by using symbols.

Made-in labelling

The European Commission is working on mandatory origin labelling (the 'made-in label') in Europe for all non-food products, including footwear. Until now, made-in labelling is voluntary.

Textile products must be labelled with the fibre composition and using the fibre names in accordance with European rules. The aim of this common set of labelling rules is to ensure that the consumer knows what he is buying.

Tips:

- For more details, check [the European Commission's information on footwear labelling](#) or the [EU Export Helpdesk](#) footwear labelling pages.
- If you choose to provide product information by using symbols, make sure you use the [pictograms prescribed in this EU Directive](#).
- Get ahead of your competitors and start working on made-in labelling. Some buyers are starting to use it or want to experiment with it in the upcoming years, before it becomes mandatory.

Products from wild plants and animals

If you use materials (partially) made from wild plants or animals – for example, boots made of crocodile leather – you need to make sure that you comply with the requirements of the [Convention on International Trade in Endangered Species \(CITES\)](#). Europe has implemented these requirements in its [Regulation 338/97](#).

The Regulation includes a list of restricted species (including products thereof) and special procedures where applicable. [Europe has separate laws on trading in seal products](#), such as seal fur.

Tips:

- Find out whether your products are covered by CITES or not. Learn more about [CITES requirements in the EU Export Helpdesk](#). The EU Export Helpdesk also provides information on the different procedures applicable to the different categories within CITES.
- Read [EU Export Helpdesk's](#) information on trading in seal products.
- Read up on emerging, trend-setting animal welfare and traceability standards in the section on additional buyer requirements below.

Safety shoes and CE Marking

If you produce safety shoes, you have to make sure that they meet the strict standards set for personal protective equipment (PPE). Safety shoes must be tested against these standards and bear the CE-mark. CE marking is a mandatory conformity scheme for certain products sold in Europe. The letters 'CE' are the abbreviation of the French phrase 'Conformité Européene', which means 'European Conformity'.

Tips:

- Read up on [CE marking in Europe](#).
- Find out more about [specific standards for personal protective equipment in Europe](#). For example, safety shoes face requirements regarding slip-resistant soles, protection against chemical substances, fire-resistance et cetera. Find out which standards are applicable to your product.
- Read the [EU Export Helpdesk](#) information on CE-marking for safety shoes.

Intellectual property rights

If you sell your own collection to European buyers, you must verify that you are not violating any intellectual

property (IP) rights. These rights may apply to the design of the product, as well as to any trademarks or pictures used.

Tips:

- Find out more about [IP rights in Europe](#).
- Check the [EU Export Helpdesk](#)'s full overview of legal footwear requirements. Under 'my exports', enter product code 64 to get a list of applicable requirements.

2. What additional requirements do buyers often have?

In addition to the legal requirements, there are a lot of non-legislative requirements you have to comply with in order to find buyers. These requirements are laid down by buyers themselves.

Sustainability, including traceability of animal and plant materials

Animal welfare and environmental care are hot topics in Europe, and buyers and branch organisations are raising their standards in these areas, going beyond what the law demands. This means that with regard to materials made from wild plants or animals, the CITES requirements are not the only ones you need to know about nowadays. In the Netherlands, the fashion and textile industries have signed a new covenant requiring full traceability – back to the supplier and to the animal – of all animal products used in garments or footwear. The [Dutch Agreement on a Sustainable Garment and Textile Sector](#) was signed by the Dutch government and a broad coalition of branch organisations, trade unions, non-governmental organisations such as [Solidaridad](#), and 57 textile brands and retailers. In addition to animal welfare, it deals with many more sustainability issues. It is expected that this covenant will soon set the trend for the rest of Europe.

Tips:

- Read the [full text of the Dutch Agreement on a Sustainable Garment and Textile Sector](#) to get an idea of where the market is going.
- Talk to your buyers about challenges and ambitions you share in following this trend. Discuss areas in which you can adapt to new market requirements in order to get ahead of the competition.

Corporate responsibility

Before animal welfare began to gain in importance, social aspects, such as basic labour rights, were already becoming a major sustainability issue in the footwear industry. One common requirement involves signing a suppliers' code of conduct, in which you declare that you conduct your operations in a responsible manner (for example that you and your suppliers respect local environmental and labour laws and that you avoid corruption).

Several initiatives have gained ground recently, especially in West European countries, for example the [Ethical Trading Initiative \(ETI\)](#) and the [Business Social Compliance Initiative \(BSCI\)](#).

Tips:

- Read up on the Ethical Trading Initiative in the ITC Standards Map. You can also read up on the [Business Social Compliance Initiative in the ITC Standards Map \(BSCI\)](#). This will give you a good understanding of the sustainability trend.
- Find out how you can adapt to these changes in your own company.

- If you are targeting the British market, familiarise yourself with the [Ethical Trading Initiative \(ETI\) base code](#) to find out what [ETI members](#) require from their suppliers.
- If you are targeting other European markets, assess your company's current performance by doing a self-assessment. You can find [an example of a self-assessment on the Business Social Compliance Initiative \(BSCI\) website](#).
- Consider implementing a management system aimed at more sustainability, such as [ISO14000](#) (environmental aspects), [OHSAS 18001](#) (occupational health and safety) or [SA 8000](#) (social conditions). Doing this can give you a strong competitive advantage.
- Discuss with your buyer which steps you can take to get ahead of the competition.
- Look into other possibilities of improving your sustainability performance. These may not always include immediate certification or application of a label (read the information in 'Niche'), but it is important to familiarise yourself with issues.
- Be aware that many of the environmental and social sustainability issues begin upstream in your supply chain: at the factory, with the collector or on the farm. Think about how you can assure responsible business on the premises of your suppliers.
- Most major brands/retailers publish their sustainability policies, including their expectations of suppliers, on their websites. Look around online for examples, such as the [Timberland Responsibility pages](#), to get a clear idea of the issues that matter.
- There are also independent websites that rank brands according to their sustainability performance. To see an example, check the [Rankabrand publication on Sustainability in Fashion, Clothing & Shoes](#).
- Check the [Sustainable Apparel Coalition](#) website and its 'Higg-index', a self-assessment standard used in the apparel and footwear industry to assess environmental and social sustainability throughout the supply chain.
- For more information about SA8000 and other standards please turn to the [ITC's Standards Map](#) and search for "textiles".

Fair wages

Wages are a growing concern in footwear as well as in other related industries, such as fashion. Several initiatives that concentrate on fair wages for footwear employees have been launched. They do not aim at minimum wages, but at 'fair wages'. Fair wages are often determined on the basis of what a labourer has to spend in order to enjoy a decent standard of living. A growing number of organisations are joining this effort. They want to be able to guarantee that the people involved in the production process earn a salary that meets their basic spending needs.

Tips:

- Make sure you stick to the relevant laws regarding wages, working hours and other labour conditions.
- On top of that, make sure you know what your European buyers expect. According to European regulations, workers in Europe are not allowed to work more than ten hours a day. While this may not apply in non-European countries, European businesses may require you to stick to it anyway.
- Check this [report on wages by the International Labour Organisation \(ILO\)](#).

Improved working conditions

Workers and the conditions they work in are also gaining attention in the footwear industry. Cleanliness and safety are the key words.

Tips:

- Make sure your factory is clean and safe. You can often make huge progress with a minimum

investment of time or money.

- To find out what kind of labour condition requirements are emerging, check [Oxfam's publication on labour rights and ethical manufacturing in the footwear and garment sectors](#).

Child labour

For most European buyers, child labour is unacceptable and non-negotiable. If you employ children, you are very unlikely to get orders from Europe. According to the [International Labour Organization](#) (ILO), 168 million children around the world are engaged in child labour. Thankfully, their numbers have declined by one third since 2000, from 246 million. More than half of these kids, 85 million, are in hazardous work (down from 171 million in 2000). The footwear industry plays a part in this and consumers and non-governmental organisations are complaining.

For example, see this 2016 [press release on rising demand for more transparency and fairer production in the footwear and leather markets](#).

Tips:

- Check the [ILO pages on child labour](#) for more facts, figures and information.
- If your company employs children but you wish to change this, talk to potential buyers about how you wish to phase out child labour. Good intentions followed by decisive measures may engage their support and business.
- If you have 'cleaned up' your business and eradicated child labour, or even replaced it with good social initiatives, communicate this with your prospective buyers. It will certainly attract their attention.

Building safety

Factory and building safety is another issue gaining more and more attention. This is because, in the garment industry, lives have been lost in factory fires and collapses that could have been avoided with the right precautions. The [Accord on Fire and Building Safety in Bangladesh](#), signed in 2013, is a good example of how safety awareness in the garment industry has come to include fire and building safety. These standards are quickly spilling over into the footwear industry and other sectors, too.

Tips:

- Find out whether your products are covered by CITES or not. Learn more about [CITES requirements in the EU Export Helpdesk](#). The EU Export Helpdesk also provides information on the different procedures applicable to the different categories within CITES.
- Read [EU Export Helpdesk's](#) information on trading in seal products.
- Read up on emerging, trend-setting animal welfare and traceability standards in the section on additional buyer requirements below.

Circular economy

In Europe, legislation is expected that will require buyers and producers of garments to account for all of the waste involved in its production processes. More and more players are recognising that waste is not a burden, but an opportunity. For example, [Adidas now offers a shoe made from ocean waste](#). Eco-friendly dyeing technologies are also emerging. See, for example, [DyeCoo's](#) solution.

Tips:

- Realise that waste is not a burden but an opportunity: minimise your waste, but also be aware that the remaining waste flow may have value.
- Look for creative examples of waste reuse, such as having leather shavings pressed into shoe soles, grinding leather shavings or other waste into floor tiles etc.
- To get some ideas, read how [regenerated leather composites \(RLCs\) are becoming a promising new material for footwear](#).
- Think holistically about your resources. Waste is not just about leftover materials or unsold products; you can also waste time, machines, people, capacity.
- Unsold products are another opportunity. Find a market for them!
- If your production waste is relatively costly, fix it; if not, repurpose it.
- Aim for waste-friendly packaging.

Transparency in the supply chain

More sustainability also means more transparency. Increasingly, each link the supply chain will need to be certified in the future. In the fashion sector, this trend is more advanced. For example, check the [Fashion Transparency Index report](#) published in 2016 by [Fashion Revolution](#). This Index ranks 40 high-visibility fashion brands based on their supply chain transparency and governance practices.

High transparency, according to the Index, means making your supply chain policies available to the public and having auditing and reporting policies in place. Merely having a code of conduct on your website counts as low transparency.

Tips:

- Transparency begins with being as open as you can about your production processes, labour conditions, sourcing and so on. If you know you cannot comply with CSR standards in some areas, communicate this with your buyer and suggest co-developing an improvement plan. Show your willingness to improve. It may keep you in business.
- Pursue transparency both within your own organisation and in the supply chain you are a part of. Trust that transparency will win the day. For example, invite your buyer to audit your company, or investigate certification options.
- Use your website and promotional materials to openly share the story behind your business.

New: the Greenpeace chemicals standard

REACH is the mandatory standard set by the government: failing to comply with REACH means you cannot do business in Europe. However, there is another standard that is also important to know about. It was launched during a recent campaign by Greenpeace: the [Detox campaign toxic-free future](#). The standards Greenpeace proposes in this initiative are stricter than those of REACH. The purpose of the initiative is to eventually create a fashion and footwear industry that is free of harmful chemicals. Many large footwear companies, such as Nike and Puma, are already affiliated with this campaign.

Tips:

- Read up on the new Greenpeace standard and other developments with regard to chemicals-free production. Check what your buyers expect of you in this area.
- With regard to chemicals, note that buyers may require laboratory test reports, as a proof of

compliance with the standards they apply. Bigger retailers often require such a report every time they want to buy a new kind of shoe. Smaller buyers often just want you to comply and will take action against non-compliance.

3. What are the requirements for niche markets?

While sustainability is gaining ground, the market segment for footwear sold as 'fair' or 'sustainable' actually is still a very small niche.

In the niche market for 'sustainable' footwear, the story of your product is more important than certification and the use of a consumer label. The term sustainability in this matter may refer to a range of issues from recycling to choice of sustainable materials, sustainable design, improved social (working) conditions and animal welfare.

Eco-labels

There are several different eco-labels addressing environmental issues. Most of them focus on specific materials (textiles, leather, cotton), not on the shoe as a whole. There is an [European Union Ecolabel for footwear](#), but again the market is very small.

The [Global Organic Textile Standard \(GOTS\)](#) and Germany's [Naturland](#) scheme are examples of textile processing standards for organic fibres. The international [OEKO-TEX](#) and the Switzerland-based [Bluesign](#) labels stand for textiles and leathers that are free of hazardous chemicals.

The [Leather Working Group](#) and [Naturleder](#) are initiatives supporting more sustainable leather.

Tips:

- Use the story of your exceptional social and environmental performances as a marketing tool. Consumers are showing more and more interest in the origin of the products they are buying and the story behind products. A well-known example is [TOMS](#), a shoe brand that donates a pair of shoes to a child in need for every pair of shoes purchased.
- If you intend to focus on the ethical niche market, you will need to find business partners. These partners could include large companies with sustainable product lines, as well as specialised buyers. The first step in determining whether your company would be a good match with prospective partners involves becoming familiar with the initiatives of these parties and how they work. To get some ideas, check these [nine brands that make ethical casual shoes and sneakers](#).
- Check the [European Ecolabel for footwear](#) to get an idea of this niche scheme's requirements.
- For more sustainability initiatives for footwear, see [ITC's Standards Map](#).

Please review our [market information disclaimer](#).