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**MINISTRY OF HEALTH**

**GENERAL DIRECTION OF SANITARY PREVENTION**

Office IV

Viale Giorgio Ribotta 5-00144 Rome

Register-classif. 1.2.b.d

**SUBJECT: Toxic Fur 2 investigation, official analysis dispatch with NIH risk evaluation. Provision of the sales ban and withdrawal from the market.**

By reference and according to the results received from the Health and Textile Association about the analysis concerned (annex 1), we attach the risk evaluation conducted by the National Institute of Health, carried out after the samplings made by the Carabinieri NAS, after the complaint lodged by LAV - Anti-Vivisection League - regarding the presence of hazardous chemical substances in the reported items.

***Provisions***

**On the basis of the results and the risk evaluation carried out by the National Institute of Health, the Directorate according to the Article 107 of Legislative Decree number 206/2005, known as “Consumption Code” for health preservation, provides that the items listed below - already subjected to temporary precautionary measures within the meaning of Note DGPRE 8411 of February the 24th, 2015 -**

1. ***Hooded down jacket with fur border***, Blumarine Baby brand, Parma NAS sampling, report n. 5/6 of January 29th 2015
2. ***Lamb fur***, Christ brand, Padova NAS sampling, report 4/13 of March 19th 2015

**are withdrawn from the market;** **it is also provided that suitable information will be addressed to consumers who have already bought those items, (by means of appropriate billboards or other effective methods), regarding the possible risk of developing allergic contact dermatitis linked with the use of these items, for the presence of Chromium.**

The NAS authorities are asked to notify this provision to the involved companies, stating that if they disagree with the decision it is possible to appeal to the Regional Administrative Court with territorial jurisdiction within 60 days from the date of notification of this measure.

Subject to the specific provisions from the Judicial Authority, **the items withdrawn from the market must be disposed of as waste,** according to the current Environmental Legislation, at the expense of the importer/distributer, as provided for by the Legislative Decree 206/2005 itself.

***Closing remarks***

**The investigations carried out in these years (Toxic Fur 1 and Toxic Fur 2) have pointed out that the manufacturing processes characterising the furs are hard to standardise; it is however requested that, for the customer protection, the manufacturers would guarantee, concerning to hazardous substances, the respect of the needed quality and security standards.**

DIRECTOR GENERAL

(dr. Raniero Guerra)

Director of Office IV

(dr. Liliana La Sala)

*Contact person/investigation responsible*

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| Command of the Carabinieri for Health SafeguardParma NASStrada dei Mercati, 9/b43126 ParmaCommander A. BallettaOffice of the Public Prosecutor at the Court of TorinoC.so Vittorio Emenuele II, 13010100 TorinoDr. R. Guarniello - Public ProsecutorHealth and Textile AssociationC.so G. Pella, n.2 - 13900 Biella*For information*Ministry of HealthOffice IVViale Giorgio Ribotta 500100 Roma**k.a. A. Fonda**NAS Carabinieri of TurinC.so Bolzano, 30 - 10100 Turin |

NATIONAL INSTITUTE OF HEALTH

**SUBJECT: “Toxic Fur 2” LAV investigation - Request of risk evaluation**

 Following the request from the Health and Textile Association about the test reports sent to this Centre, as regards an investigation on pieces of clothing for children with animal fur components, it is provided the opinion concerning the risk evaluation linked with the exposition to certain chemical substances in fur and leather inserts.

CENTROCOT Laboratory analysed leather and fur samples from two items of clothing. For the first item “Blumarine Baby” (Hooded down jacket with fur border), the analysis was done on a sample of leather and a sample of hair of the border fur. For the item Christ (Natural lamb fur), the analysis was done on a sample of leather of the fur.

For the item of clothing “Blumarine Baby” the two samples A and B, show extractable hexavalent Chrome levels respectively equal to 37,3 mg/kg and 27,1 mg/kg in the leather of the fur border.

The Regulation (UE) n. 301/2014 (amendment to annex XVII of the REACH regulation) has determined that items with leather inserts coming into contact with the skin cannot be placed on the market if one of these pieces contains hexavalent Chromium in concentrations equal or higher than 3 mg/kg (0,0003%) on the total dry weight of that leather part. This restriction cannot be applied to the placement on the market of items used already in the end-use phase in the EU before May 1st 2015. Furthermore, a study carried out by the German Federal Institute for the *Risk Assessment* (BFR 2007) has underlined that the presence of Chromium VI in leather clothes and shoes can trigger allergic reactions (e.g. contact eczema) in hypersensitive individuals. The study points out that these effects can occur also at lowest concentrations and at levels of 5 ppm (mg/kg), or higher of Chromium VI.

The item of clothing “Christ” shows insignificant hexavalent Chromium levels. But extractable hexavalent Chromium levels are about 35 mg/kg, attributed to the presence in its trivalent structure. Chromium’s trivalent compounds are much less toxic than hexavalent ones. Trivalent Chromium does not cause cancer and is an essential nutrient for the human being and its deficiency may cause several adverse effects for health, for example cardiovascular diseases, impaired fertility and glucose tolerance. Trivalent Chromium is not considered irritating for the skin, even if literature reminds that a long exposure may cause less pronounced skin lesions than the ones caused by hexavalent Chromium. **The results of some studies available in literature suggest also that trivalent Chromium may be linked to skin sensitisation. Its use with oxidant agents ( e.g. permanganates), may also lead to the formation of hexavalent Chromium (EHC, 1988). It is however important to underline that trivalent Chromium has less ability in penetrating the skin than hexavalent Chromium.**

A study by Hansen et al. (2003) has showed results related to a balancing test of MET (*minimum elicitation threshold*) values for hexavalent and trivalent Chromium. During the elicitation phase the immune response is immediate. This evaluation reveals that the MET 10%, which is the concentration corresponding to a 10% of allergic reactions among the tested patients, is for trivalent Chromium 6 times bigger than the one of hexavalent Chromium, so that the first one has a more moderate allergenic effect compared to the second one.

**Considering that for hexavalent Chromium the concentration related to the possible release caused by perspiration should be kept under 3 mg/kg because of the possible triggering of contact allergic dermatitis, it is recommended that, without any information about Chromium compounds contained in the items of clothing, Chromium concentrations, related to the possible release caused by perspiration, should be kept under 18 mg/kg.**

**Based on the above mentioned information and the predictable contact of this fabric with the skin, due to its use by a vulnerable category of customers (children), it cannot be excluded that there is a threat of sensitisation effects linked to these items of clothing as established by the Legislative Decree 206 of September 6th 2005 (Consumer code, updated version 7/3/2012) as regards the fundamental right of customer’s health protection**.

In the light of the above considerations, it is considered irrelevant the evaluation about the presence of other substances detected above the instrumental limits.

At your disposal for any additional clarifications.

Director of the National Center of

Chemical Substances

Dr. Rosa Draisci

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| **k.a.****Dr. Rosa Draisci****Director of the National Centre of Chemical Substances****National Institute of Health****Viale Regina Elena, 229****00161 ROME** |

Biella, September 7th, 2015

**SUBJECT: LAV “Toxic Fur 2” investigation- risk evaluation request**

Enclosed to this document, we send the results related to the investigation concerned, and in particular to the following samples:

* ***Down jacket with fur collar***, Blumarine Baby brand, Parma NAS sampling report n. 5/6 of January 29th 2015
* ***Lamb fur***, Christ brand, Padova NAS sampling, report 4/13 of March 19th 2015

The results of tests (attached summary scheme) have revealed the presence of:

* **Hexavalent Chromium (Chromium VI) in the items of clothing “Blumarine Baby” in concentrations clearly exceeding the limit established by EU regulation n. 301/2014** of the Commission dated 25/03/2014 amending the Annex XVII of the REACH Regulation;
* Other chemical substances, whose presence is not a mandatory requirement.

**On the above basis, it is required to the National Institute of Health a risk evaluation** concerning the tested samples, as already been done in the previous LAV investigation named Toxic Fur 1.

With best regards,

The Director

Mauro Rossetti

Health and Textile Association

**TEST RESULTS - LAV “TOXIC FUR 2” INVESTIGATION**

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| **COMPANY** | **ITEM IDENTIFICATION** | **TEST RESULTS** |
| **Leather extractable metal** | **Leather metal total content** | **Leather carcinogenic aromatic ammines** | **Fibre-leather ethoxilates****Alkylphenol** | **Chromium VI content** | **Formaldehyde content** |
| BLUMARINE BABYHooded down jacket with fur border | Sample A15LA12771/01 LEATHER of the fur border | Cadmium<0,03mg/kgChromium 168Mercury<0,01 mg/kgLead<0,1 mg/kg | Mercury< 0,3 mg/kgAluminium 437 mg/kgCadmium <3 mg/kgChromium > 1000 mg/kgLead<3 mg/kg | N.D. | NPEO12,2mg/kgOPEO3,4 mg/kg | 37,3 mg/kg | Total 78 mg/kg(hair and leather tested together) |
| Sample A15LA12771/02 HAIR of the fur border |  |  |  |  |  |
| Sample B15LA13154/01 LEATHER of the fur border |  |  |  | NPEO<0,7 mg/kgOPEO<0,7 mg/kg | 27,1 mg/kg | Total 57 mg/kg (hair and leather tested together) |
| Sample B15LA12770 HAIR of the fur border |  |  |  |  |  |
| CHRISTNatural lamb fur | 15LA12770 LEATHER of the fur | Cadmium<0,03 mg/kgChromium 35Mercury<0,01 mg/kgLead<0,1 mg/kg | Mercury<0,3 mg/kgAluminium 118 mg/kgCadmium < 3 mg/kgChromium >1000 mg/kgLead < 3 mg/kg |  | NPEO<0,7 mg/kgOPEO<0,7 mg/kg | <0,3 mg/kg | <0,10mg/kg |

Except for the content of hexavalent Chromium (Chromium VI) which is required by Law, for the other results a National Institute of Health evaluation is required as some parameters are:

* not mandatory requirements;
* their presence on the item doesn’t mean an immediate risk for the customer;
* the limits on their content are deductible from the standards but need to be “scientifically” assessed.