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To whom it may concern

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## Regulatory Status of Glutaraldehyde

On 8 July 2021, glutaraldehyde was added to the "Candidate List of substances of very high concern for Authorization" due to its already known classification as a respiratory sensitizer. Inclusion in the Candidate List implies immediate obligations for the suppliers of the substance, in particular to provide a safety data sheet and communicate its safe use. Both requirements are already met by Stahl. Inclusion on the candidate list cannot be understood as a blanket ban on this substance which can still be legally used in the EU.

The additional requirement for the manufacturer of articles containing glutaraldehyde in concentrations above 0.1% (w / w), that ECHA has to be notified with some information via the SCIP database, should not be applicable because glutaraldehyde should react completely when used as a tanning agent.

According to the information provided by ECHA, a second step could be the submission of a restriction proposal. Stahl is closely monitoring any further information in this regard and will keep its customers informed accordingly.

## Application of Glutaraldehyde

Glutaraldehyde is a highly reactive tanning agent, which is and has been used with great success in the leather industry for five decades. It is used in the wet white tanning system and for other leather-making purposes. Due to its dual aldehyde functionalities, it will crosslink collagen in the pelts very effectively to make leather and in an irreversible and stable manner. If dosing is ran according to technical information standards, the glutaraldehyde is completely reacted during the tanning process and therefore it cannot be released from the final leather article.

With glutaraldehyde, safe handling in transport and storage, as well as a closed dosing system is essential for ensuring a safe working environment within a tannery and for addressing the requirements of working with a substance of very high concern (SVHC), in a responsible manner



## An alternative

EasyWhite Tanned leather (EWT) is recognised as being a very technically viable alternative to both glutaraldehyde and chrome tanning for many types of leather articles.

We have seen the increased use of our EasyWhite Tan system in the field of offering more sustainable alternatives to both Chrome and Glutaraldehyde based leathers.

This innovative organic tanning method requires no pickling and contributes to more sustainability in the tannery through major salt, water, and energy reductions during tanning. A significant lower acute toxicity and the ability to make white leathers makes it a valuable alternative to the wet white process.

As with all tanning systems, it does crosslink collagen effectively, it is after all also a reactive tanning compound, and therefore the usual and sensible industrial hygiene measures will have to be observed.

Important is also here a safe handling and wearing personal protective equipment when applying the EWT process. To place it into sensible context, all tanning agents are reactive otherwise they would be unable to tan the leather.

On behalf of Stahl Holdings bv 5140 AC Waalwijk, Netherlands Dr. Harald Bauer

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