businesscompanion
trading standards law explained

Leather goods

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Key legislation

Although the United Kingdom left the European Union (EU) in 2021, certain pieces of legislation (known as 'assimilated law') continue to apply until such time as they are replaced by new UK legislation, revoked or permitted to expire. This means that our guidance still contains references to legislation that originated from the EU.

This guidance is for England, Scotland and Wales

Any consumer product made of leather - for example, clothing, shoes, bags, belts, furniture, soft furnishings, and even equine equipment, such as saddles and bridles - is subject to controls on the chemicals that may be present as a result of the tanning process. Chemicals such as azo dyes, chromium VI and dimethyl fumarate (DMF) have previously been found to be present in leather goods and are now restricted under regulations due to the health hazards they pose to consumers.

If you are a manufacturer or importer (referred to in law as the 'producer'), you would normally be expected to have tested your products to ensure that they comply. If you are not the manufacturer or importer, you should check with your supplier that the products comply with the Regulations; this could involve asking to see test certificates, or auditing your suppliers if you are a large retailer.

The legislation

Assimilated Regulation (EC) No 1907/2006 *concerning the Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH)* regulates the use of azo dyes, chromium VI and dimethyl fumarate (DMF). This Regulation was adopted into UK law on 1 January 2021 and is now known as UK REACH.

Anyone who supplies consumer leather products intended to come into direct and prolonged contact with the skin, and that may contain any of these chemicals, will be affected by the Regulation. Examples are as follows:

- clothing
- hats
- footwear
- gloves
- wristwatch straps
- handbags
- purses
- toys containing leather
- furniture
- soft furnishings
- equine equipment, such as saddles and bridles

Azo dyes, chromium VI and dimethyl fumarate

Azo dyes are organic compounds. Azo dyes are used to treat textiles, leather articles and some foods. Some - such as dinitroanline orange, ortho nitroaniline orange, or pigment orange 1, 2, and 5 - are mutagenic and carcinogenic. Azo dyes derived from benzidine are carcinogens.

Tanning is the process of making raw hides or skins into leather. The majority of leathers used in furniture, gloves and footwear are tanned using chromium salts. Contact with the skin can cause burns and contact-dermatitis allergic reactions, which appear as reddening of the skin, itching and rashes.

Chromium VI is a skin sensitiser; future reactions can be caused when only a very small amount is in contact with the skin. There are also dangers from ingestion. This is a particularly important hazard to assess for young children's toys or clothing where there is a risk of mouthing. Studies have shown the ingestion of chromium VI may affect the liver, kidneys and the immune system.

DMF is used as a biocide in leather products, such as furniture or shoes, to prevent growths of mould during storage or transport in a humid climate. DMF has been found to be an allergic sensitiser at very low concentrations, producing an eczema reaction that is difficult to treat. Concentrations as low as 1ppm may produce allergic reactions.

Azo dyes in products

Azo dyes, which may release one or more listed aromatic amines above 30 mg/kg (0.003% by weight), must not be used in articles that may come into direct and prolonged contact with the human skin or oral cavity - for example:

- clothing
- hats
- footwear

- gloves
- wristwatch straps
- handbags
- purses / wallets (including those worn around the neck)
- briefcases
- purses
- leather toys and toys that include leather garments

Leather articles must not be placed on the market unless they conform to these requirements.

Chromium VI in products

Leather articles or articles containing leather parts coming into contact with the skin must not be placed on the market where they contain chromium VI in concentrations equal to or greater than 3 mg/kg (0.0003% by weight) of the total dry weight of the leather.

Dimethyl fumarate in products

Leather products containing the biocide DMF in concentrations greater than 0.1 mg/kg must not be placed on the market.

Second-hand leather goods

For products sold second-hand, the General Product Safety Regulations 2005 (GPSR) apply. These require goods supplied to be safe so the restrictions will still apply.

Manufacturers and importers ('producers')

You are classed as a 'producer' if you are one of the following:

- the manufacturer of a product established in the UK
- any other person presenting themselves as the manufacturer by affixing to the product their name, trademark or other distinctive mark
- the importer of a product into the UK

What should I do to make sure I comply?

If you are come under the definition of a producer, you would normally be expected to have tested your products to ensure that they comply. It is recommended that a reputable test house should carry out any testing, such as one accredited by the United Kingdom Accreditation Service (UKAS).

If you are not a producer, you should check with your supplier that the products comply with the Regulations. This could involve asking to see test certificates, or auditing your suppliers if you are a large retailer. How much you need to do depends on a number of circumstances - for example, the size of your business - but doing nothing will not be sufficient.

Trading Standards

For more information on the work of Trading Standards services - and the possible consequences of not abiding by the law - please see 'Trading Standards: powers, enforcement and penalties'.

In this update

No major changes.

Last reviewed / updated: April 2024

Key legislation

- General Product Safety Regulations 2005
- assimilated Regulation (EC) No 1907/2006 *concerning the Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH)*
- REACH Enforcement Regulations 2008
- REACH etc (Amendment etc) (EU Exit) Regulations 2019

Please note

This information is intended for guidance; only the courts can give an authoritative interpretation of the law.

The guide's 'Key legislation' links go to the legislation.gov.uk website. The site usually updates the legislation to include any amendments made to it. However, this is not always the case. Information on all changes made to legislation can be found by following the above links and clicking on the 'More Resources' tab.

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