



The New EU Restrictions on Organotin Compounds starts on 1 July 2010

欧盟对有机锡化合物的新限制要求自2010年7月1日始实行

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From 1 July 2010, the footwear industry will need to comply with the new restrictions on organotin compounds in the REACH regulation.

The new restrictions were published on 31 March 2010 in the Commission Regulation (EU) No 276/2010 and they will be implemented in three phases. The first phase, which starts from 1 July 2010, is the restriction on all tri-substituted organotin compounds in articles. The second phase will cover only two di-substituted organotin compounds, dioctyltin (DOT) and dibutyltin (DBT), and the restrictions start from 1 January 2012. The third phase covers some specific products containing DBT and it starts on 1 January 2015. Table 1 below is a summary of the details of these restrictions.

自 2010 年 7 月 1 日始，制鞋行业需满足 REACH 法规中对有机锡化合物的新限制要求。

新限制要求登载在 2010 年 3 月 31 日欧盟委员会法规第 276/2010 号上，将分三个阶段实施。第一阶段从 2010 年 7 月 1 日开始，将限制各种产品中的所有三取代有机锡化合物。第二阶段仅针对两种二取代有机锡化合物，即二辛基锡 (DOT) 和二丁基锡 (DBT)，该限制将从 2012 年 1 月 1 日起实施。第三阶段将针对某些含 DBT 的特定产品，并将从 2015 年 1 月 1 日起实施。下文表 1 是这些具体限制要求的综述。

What do These Restrictions Means for the Footwear Industry?

Since tri-substituted organotin compounds are mainly used as biocidal agents, footwear manufacturers should pay attention to this new restriction, particularly if their products have been treated with chemicals to provide anti-fungal or anti-bacterial property. In the EU insoles for shoes have been found to contain tri-substituted organotin compounds, alongside other products such as non-allergenic pillows, padding of cycling shorts and athlete's foot spray.

Some well-known tri-substituted organotin compounds are tributyltin (TBT) and triphenyltin (TPT), however, the restriction covers all tri-substituted organotin compounds.

What do These Restrictions Means for Those Products Already on the Market?

Articles that contain the restricted organotin compounds above the limit cannot be placed on the market after the applicable effective date; this means unsold stocks in the distribution chain must be withdrawn from the market.

Act now to ensure your new exports comply with the new requirements so that you can continue to enjoy the EU market share after the restrictions have become effective.

这些限制要求对制鞋行业有何意义?

由于三取代有机锡化合物主要用作杀菌剂，鞋类生产商应当重视这一新规定，如果其产品是采用化学杀菌处理，则尤其需要重视。欧盟在鞋垫中已经发现了某些三取代有机锡化合物，同时其他产品如抗过敏枕头、自行车短裤和运动员的足部喷雾等中也发现有该物质。

为人熟知的三取代有机锡化合物有三丁基锡 (TBT) 和三苯基锡 (TPT)，不过，该限制要求涵盖了所有三取代有机锡化合物。



这些限制要求对已经上市的产品有何意义?

在生效日之后，限制性有机锡化合物含量超标的物品不得上市销售，这就意味着分销链中未售出的库存必须撤出市场。

因此您现在就要行动起来，以确保新的出口产品符合新规定要求，这样您就可以在限制规定生效之后，继续享有欧盟市场的份额。

Table 1: A summary of the new organotin restrictions in REACH Annex XVII, as published in the Commission Regulation (EU) No 276/2010.

表 1: REACH 附件 17 中有机锡新限制要求综述, 登载于欧盟委员会法规出版物第 276/2010 号。

| Effective Date 生效日 | Organotin Compound 有机锡化合物 | Scope 范围 | Limit 上限 |
|----------------------------------|--|--|--|
| 1 July 2010 2010 年 7 月 1 日 | All tri-substituted organotin eg. tributyltin (TBT) triphenyltin (TPT) 所有三取代有机锡 如 三丁基锡 (TBT) 三苯基锡 (TPT) | All Articles (for the general public or professional use) 所有物品 (普通公众或专业用途) | $\leq 0.1\%$ by weight of tin, in the article or part thereof 物品或组份中的锡重量 比 $\leq 0.1\%$ |
| 1 January 2012 2012 年 1 月 1 日 | Diocetyl tin (DOT) 二辛基锡 (DOT) | The following articles for supply to, or use by, the general public: <ul style="list-style-type: none"> • textile articles intended to come into contact with skin • gloves • footwear or part of footwear intended to come into contact with skin • wall and floor coverings • childcare articles • female hygiene products • nappies • two-component room temperature vulcanisation moulding kits (RTV-2 moulding kits) 供公众使用的下列物品: <ul style="list-style-type: none"> • 拟与皮肤接触的纺织品 • 手套 • 拟与皮肤接触的鞋或其部件 • 墙面或地面覆盖物 • 儿童护理物品 • 女性卫生用品 • 尿布 • 双组份室温硫化模具 (RTV-2 模具) | $\leq 0.1\%$ by weight of tin in the article (or mixture), or part thereof 物品 (或混合物) 或其 组份中的重量比 $\leq 0.1\%$ |
| | Dibutyltin (DBT) 二丁基锡 (DBT) | All mixtures & articles supplied to the general public, except those listed below.* 所有供公众使用的混合物及物品, 下列项目除外。* | |

| Effective Date 生效日 | Organotin Compound 有机锡化合物 | Scope 范围 | Limit 上限 |
|---|--------------------------------|--|---|
| 1 January 2015 2015年1月1日 | Dibutyltin (DBT) 二丁基锡 (DBT) | <p>The following mixtures and articles for supply to the general public:</p> <ul style="list-style-type: none"> one-component and two-component room temperature vulcanisation sealants (RTV-1 and RTV-2 sealants) and adhesives paints and coatings containing DBT compounds as catalysts when applied on articles soft polyvinyl chloride (PVC) profiles whether by themselves or coextruded with hard PVC fabrics coated with PVC containing DBT compounds as stabilisers when intended for outdoor applications outdoor rainwater pipes, gutters and fittings, as well as covering material for roofing and façades <p>供公众使用的下列混合物及物品:</p> <ul style="list-style-type: none"> 单组份及双组份室温硫化密封剂 (RTV-1 及 RTV-2 密封剂) 及粘合剂 使用时含 DBT 化合物作催化剂的油漆和涂料 软性聚氯乙烯 (PVC) 型材, 无论是单独或与硬性 PVC 共同成型 拟作户外用途、含 DBT 化合物作稳定剂的 PVC 面料 户外落水管、水槽和管件, 以及屋顶和装饰面的覆层材料 | <p>≤0.1% by weight of tin in the article or the mixture, or part thereof</p> <p>物品 (或混合物) 或其组份中的重量比 ≤0.1%</p> |
| <p>* Restrictions on dibutyltin (DBT) compounds do not apply to materials and articles intended to come into contact with food, as regulated under Regulation (EC) No 1935/2004.</p> <p>* 按欧盟法规第 1935/2004 号规定, 对 DBT 化合物的限制不适用于拟与食物接触的材料和物品。</p> | | | |

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