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RESTRICTED SUBSTANCES LIST FOR METALLIC PARTS

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Written by	Quality review (signature/date)	Process owner	r (signature/date)
	26/08/2025	26/08/2025	
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Change log

Version	Date	Modification
05	27Mar23	Decision Technical WG 16Mar23 – action CQI-23-078 Annual revision without modification of requirements for chemicals and limits in the list Suppression of allergen list at the end of the document Add of pin buckle in the scope of the list
06	08Apr24	Annual revision Suppression of Cobalt in allergenic metal release test Update of RoHS regulatory reference (table page 2/3)
07	26Aug25	Revision – Validation TWG 22Aug25 • Addition of PRO051 as Level 2 document • Reduction of cadmium limit to 75 mg/kg and of lead to 90 mg/kg as per Minnesota 325E.3892

Associated document (level 1)

Document	Title
MAQ016	Chemical Compliance Process

Associated document (level 2)

Document	Title
PRO051	Veille réglementaire et normative

Associated document (level 3)*

Document	Title
-	-

^{*} Internal documents – not disclosed.



Scope of the document

This document defines the list of restricted dangerous chemical substances and testing requirements for metallic inserts, spring bars, pin buckle, and emblems in the context of leather bracelet compliance as specified by AQC.

For the definition of the limits present in this Restricted Substances list (RSL), AQC takes into consideration all the current international regulations for dangerous substances available and select the strictest limit. The list of chemicals present in this document has been selected on the basis of a risk-based approach completed by AQC experience and knowledge.

International regulations mentioned in this document are:

Abbreviation	Regulation	Country	Comment
GB 28480	Adornment Provision for limit of baneful elements	China	-
Proposition 65	Safe Drinking Water and Toxic Enforcement Act	USA (California)	-
REACH XVII	Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)	EU	Annex XVII Substances subject to restriction
RoHS	Directive (EU) 2017/2102 amending directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment	EU	equivalent to the requirement of annexe 2.18 of ORRChim ordinance (Switzerland)

AQC limit for Proposition 65

For substances listed in the Proposition 65 California, AQC limits take into account the limit in articles present in the case law of Proposition 65 and more precisely the limits indicated in the reformulation injunctions of settlements and judgements.

AQC considers in case law: leather articles and related articles to the watch bracelet but also any other article with a related exposure scenario (skin contact).

For substances without indication of a limit in articles, AQC performs testing of a risk-based selection of substances potentially used for leather production and keeps available for Watch Brands all the data as a support for labelling decision.

General requirements for laboratory testing

Sample picture

Picture of metallic parts received by the laboratory have to be taken without plastic bag.

• Sample preparation

Samples are prepared as indicated in the methods requested by AQC.

AQC does not have further specific requirements.

TITANIUM

Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Regulation	AQC required Method	
ID	Elements composition	-	several	for information Indication of Titanium grade(s)	-	EDX	
	Cadmium	Cd	7440-43-9	75 mg/kg	Minnes - to 2055 2000	EN 62321-5	
	Lead	Pb	7439-92-1	90 mg/kg	Minnesota 325E.3892	EPA 3050B	
Heavy Metals	Mercury	Hg	7439-97-6	1000 mg/kg	RoHS	EN 62321-4	
	Arsenic	As	7440-38-2	1000 mg/kg	GB 28480	EN 62321-5 adapted	
Oxidized metal	Chromium (VI)	Cr(VI)	18540-29-9	1000 mg/kg	RoHS	EN 62321-7	
Only if Nickel detected by EDX							
Allergenic Metal release	Nickel	Ni	7440-02-0	0.88 μg/cm²/week	REACH XVII entry 27	EN ISO 1811+A1	

STAINLESS STEEL

Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Regulation	AQC required Method
ID ¹	Elements composition	-	-	for information Indication of stainless-steel type(s)/family ²	EN 10027 AISI (US)	EDX
	Cadmium	Cd	7440-43-9	75 mg/kg	Minnesota 325E.3892	EN 62321-5
I I a a va Matala	Lead	Pb	7439-92-1	90 mg/kg		EPA 3050B
Heavy Metals	Mercury	Hg	7439-97-6	1000 mg/kg	RoHS	EN 62321-4
	Arsenic	As	7440-38-2	1000 mg/kg	GB 28480	EN 62321-5 adapted
Oxidized metal	Chromium (VI)	Cr(VI)	18540-29-9	1000 mg/kg	RoHS	EN 62321-7
Allergenic Metal release	Nickel	Ni	7440-02-0	0.88 μg/cm²/week	REACH XVII entry 27	EN ISO 1811+A1

¹ For spring bars, EDX is performed on the 4 parts (tube, mobile tip, lug, spring); For pin buckle, EDX is performed on the pin ("ardillon") and the buckle. ² Upon specific request, the precise type of stainless steel could be determined by the performance of Sulfur and Carbon titration by ISO 15350.

MASSIVE BRASS, PLATED-BRASS

Substance family	Substance Name	Abbr.	CAS Number	AQC limit	Regulation	AQC required Method
ID	Elements composition	-	-	for information Check of Copper/zinc alloy	-	EDX
	Cadmium	Cd	7440-43-9	75 mg/kg	Minnesota 325E.3892	EN 62321-5
	Lead	Pb	7439-92-1	90 mg/kg		EPA 3050B
Heavy Metals	Mercury	Hg	7439-97-6	1000 mg/kg	RoHS	EN 62321-4
	Arsenic	As	7440-38-2	1000 mg/kg	GB 28480	EN 62321-5 adapted
Oxidized metal	Chromium (VI)	Cr(VI)	18540-29-9	1000 mg/kg	RoHS	EN 62321-7
Allergenic Metal release	Nickel	Ni	7440-02-0	0.88 μg/cm²/week	REACH XVII entry 27	EN ISO 1811+A1

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