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|  | Name: Ramesh Naidu Poluparthi  Organisation: Bureau of Indian Standards  Email: rameshnaidu@bis.gov.in | 4.5 | table 2 | te | Clause 4.5, Table 2, S.No v), e)  The current draft refers to IS 582 (Part 8/Sec 1) / ISO 13365-1 for estimating TCMTB, PCMC, OPP, and OIT in leather using Liquid chromatography. However, it lacks method for estimating Phenol content. It is recommended to incorporate ISO 20536, which details the GC-MS method for measuring Phenol in footwear materials | “Add test method ISO 20536 for Phenol estimation” after IS 582 (Part 8/Sec 1) / ISO 13365-1 |  |
|  | Name: Ramesh Naidu Poluparthi  Organisation: Bureau of Indian Standards  Email: rameshnaidu@bis.gov.in | 4.5 | table 2 S.No i | te | Clause 4.5, Table 2, S.No i), which pertains to Critical Chemical Substances regarding Aromatic Amines from Azo dyes. It has been observed that the draft standard does not specify the particular Aromatic Amines. To provide clarity, it is suggested to include a reference to Table B-1 of IS 17011:2018, which lists the 24 aromatic amines released from Azo dyes. This addition would offer uniformity of approach for manufacturers and Labs for compliance to IS. | Replace the existing text with “Aromatic amines of azo dyes (individual or sum of the listed amines at Table B-1 of  IS 17011:2018), mg/kg, Max |  |
|  | Name: Ramesh Naidu Poluparthi  Organisation: Bureau of Indian Standards  Email: rameshnaidu@bis.gov.in | 4.5 | table 2 S.No ii | te | Clause 4.5, Table 2, S.No ii) concerning Critical Chemical Substances related to Chlorophenols. The draft standard does not specify the individual Chlorophenols to be tested. To ensure uniformity of approach, it is recommended to refer Table B-11 of IS 17011:2018, which outlines chemical requirements for footwear and includes a total of 10 Polychlorophenols. Alternatively, Clause 6.1 of IS 14575:2024 refers a list 19 Chlorophenols. This change would ensure uniformity of approach with other footwear standards enforced by BIS. | Replace the existing text with “Chlorophenols (individual or sum of the listed Chlorophenols variants, including isomers listed at table B-11 of IS 17011:2018  or clause 6.1 of IS 14575:2024), mg/kg, Max |  |
|  | Name: Ramesh Naidu Poluparthi  Organisation: Bureau of Indian Standards  Email: rameshnaidu@bis.gov.in | 4.5 | table 2 S.No iii |  | This refers to the maximum limit specified for Formaldehyde in the current draft standard. Table 1 of IS 17011:2018 sets the requirement for Formaldehyde as below:  Adults:  100 mg/kg - Not in direct contact with skin                  75 mg/kg - Direct contact with skin  Children: 20 mg/kg.  In contrast, the draft standard proposes a limit of  Adults: 150.0 mg/kg  Children: 75.0 mg/kg which is significantly higher than that specified in IS 17011:2018, which is implemented for the other footwear standards under QCOs.  To align with IS 17011:2018, it is suggested that the maximum limit for Formaldehyde be reduced to  Adults: 100 mg/kg - Not in direct contact with skin   75 mg/kg - Direct contact with skin  Children: 20 mg/kg.  This change would ensure uniformity of approach with other footwear standards enforced by BIS. | Requirements:  “Replace the existing requirement with  Adults:  100 mg/kg - Not in direct contact with skin  75 mg/kg) - Direct contact with skin  Children:  20 mg/kg” |  |
|  | Name: Ramesh Naidu Poluparthi  Organisation: Bureau of Indian Standards  Email: rameshnaidu@bis.gov.in |  |  | ed | There is a significant focus on quality control orders (QCOs) for footwear in India, with 27 footwear standards implemented and brought under compulsory certification scheme to ensure the safety and quality of footwear products. In this context, it is also observed that 4 ISs (IS 5676, IS 6664, IS 6719 & IS 13893) have already been issued for footwear components/materials out of 27 footwear products.  Implementing this QCO of this draft standard could help standardize quality of upper leather for direct moulding processes used in shoes, ensuring that materials used meet necessary safety and performance criteria. This would not only protect consumers but also enhance the competitiveness of Indian manufacturers by aligning them with global standards.  Hence, it is requested that the draft WC (CHD17 (26208) (IS 5677)) once accepted as an Indian Standard may also be considered for compulsory certification as well. | This standard to be brought under Compulsory Certification |  |