

FROM MANDATE TO MARKET ACCESS

Building Compliance Infrastructure
for DPP, Forced Labor, RSL, and EPR

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Technical Services Vice President North America, Eurofins

with **Thomas Crockett**

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July 16, 2026



Softlines &
Hardlines

CPSC eFiling Is Live — Are You Exposed?

Effective July 8, 2026: Certificates of compliance are now structured data records transmitted electronically with CBP at entry. A filing failure can hold a shipment today.

If you were not fully ready — triage in three moves:



1. Confirm with Broker

Are kids' product entries actually transmitting certificate data?
Assume nothing; verify the transmission logs directly.



2. Audit Last Week

Review every children's footwear entry filed since July 8 for data gaps or rejections. Catch the errors before CBP flags them.



3. Prioritize Volume

Fix highest-velocity SKUs first. That is where exposure compounds fastest and where delays cost the most margin.

Key takeaway: Certifications are not new. Electronic transmission of structured data at the port of entry is new.

Now

Voluntary Beta Stage

Risk-free system alignment and API testing.

July 8, 2026

Mandatory Full Implementation

Structured data required at entry for most regulated products.

January 8, 2027

FTZ Implementation

Mandatory for products exiting Foreign Trade Zones.

Revised FDRA RSL: From List to Decision Tool

Tiers weight enforcement probability, not just regulatory existence — testing dollars follow actual risk.

The Three Tiers

- ✓ **Tier 1: US-Regulated / High Enforcement** Lead, Cr(VI), PFAS, Phthalates, Azo dyes, BPA, VAM (new). *Non-negotiable.*
- ✓ **Tier 2: Internationally Regulated** Nickel release, APEOs, PAHs, Chlorinated paraffins, Organotins. *Market-dependent.*
- ✓ **Tier 3: Aspirational / On the Horizon** Cyclosiloxanes, UV 326, DPHP, Acetophenone azine. *Monitor.*

Three New Lenses

- ✓ **Children vs. Adult** WA, VT, OR laws are kids-specific. Now flagged per substance to optimize testing scope.
- ✓ **Prop 65 Relevance** 900+ listed chemicals; this column answers "where is the actual footwear risk?"
- ✓ **AFIRM Side-by-Side** See exactly where the footwear-specific view aligns with or diverges from AFIRM.

RSL: What Moved — and How to Test Smarter

New Substances & Tightened Limits

VAM (New Tier 1): Prop 65 listing effective 2026.

Prevalent in footwear adhesives & coated materials.

PFAS TOF (Tightened to 50 ppm): AFIRM 2025/26 aligned. CA drops to 50 ppm in 2027.

BPA (Lowered to 10 ppm): Textiles & leather. BPS/BPF/BPB cut to 200 ppm textiles / 800 ppm leather.

Built-in Cost Reductions

- Share results across styles (e.g., shared outsoles).
- Test 3+ colorways of like material in one submission.
- Use spot tests (nickel, formaldehyde) as cheap pass/fail screens.



Forced Labor Laws: US vs. EU

Your US Forced Labor program is the foundation — not the finished building.

	Forced Labor Law (US)	Forced Labour Reg (EU)
Scope	Targeted geographic boundary.	Universal. No geographic boundary to organize around.
Burden of Proof	Presumption against importer; must prove negative.	Authority-substantiated, but requires deep visibility to defend.
Consequence	Border detention and seizure.	Market withdrawal reaching physical retail shelves.
The Ask	"Prove this isn't from Target region."	"Prove there is no forced labor anywhere in the chain."

Both laws reward the same capability — deep, documented, multi-tier traceability

Forced Labor Laws: US vs. EU

The ESPR framework is in force. Footwear specifics are arriving via delegated acts. Readiness is a today problem.



Digital Product Passport

Digital record of composition, footprint, durability, and recyclability. Populated by the exact same supply-chain data RSL and traceability already demand.



Destruction Ban

Direct prohibition on destroying unsold apparel & footwear for large companies starting mid-2026. End-of-season destruction as brand protection is over in the EU.

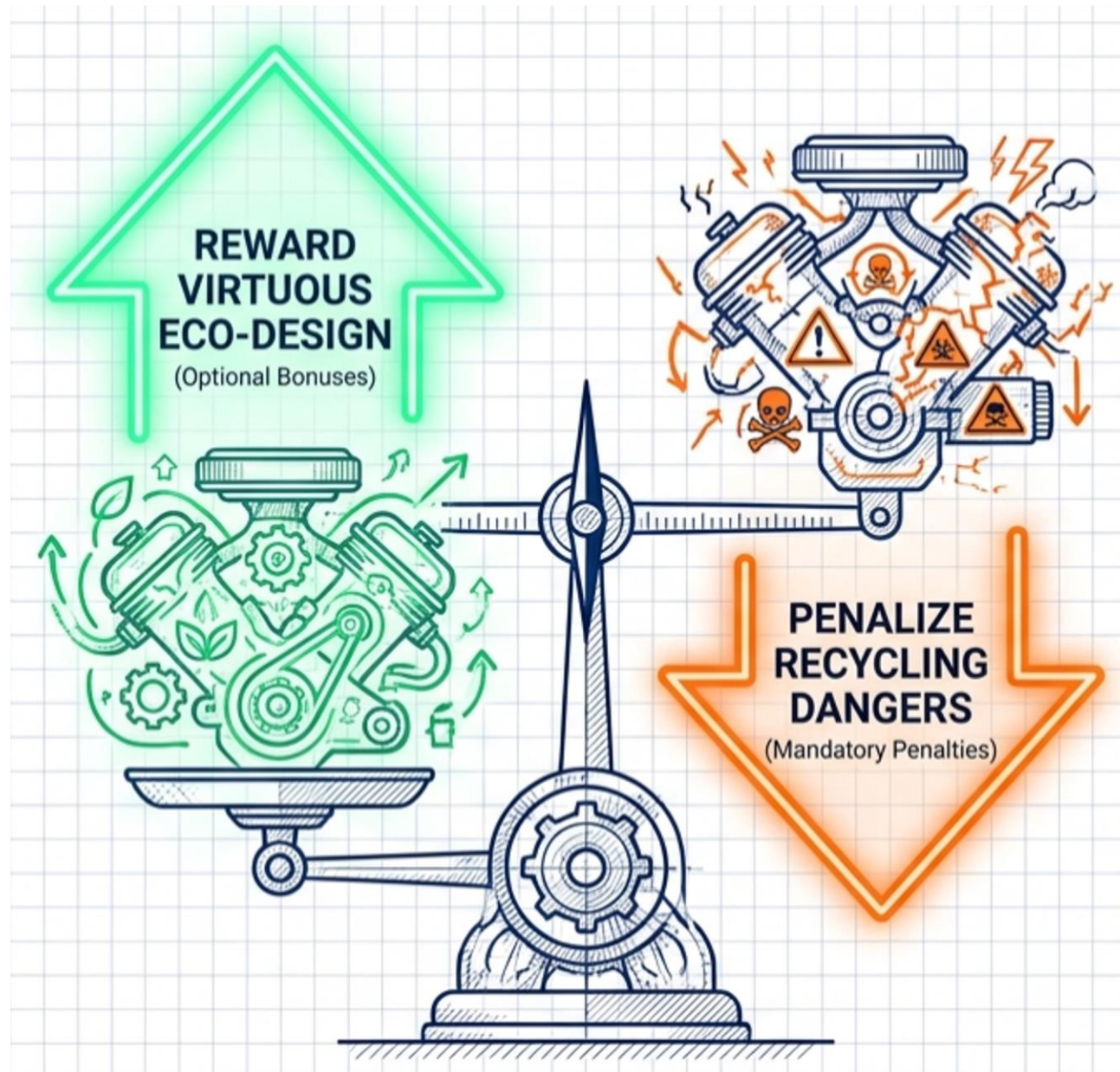


EPR + Eco-Modulation

Producer fees fund collection. The fee flexes with the product's environmental profile. Bonus for durable/recyclable; penalty for the opposite.

California Bridge: SB 707 brings textile EPR to your largest domestic market — the structure rhymes with France. Build once.

The ReFashion Ledger: Carrots vs. Sticks



Durability Bonus Rewards
physical durability
evaluated by lab tests.



Certification Bonus
Rewards recognized
environmental labels (e.g.,
GOTS, Oeko-Tex).



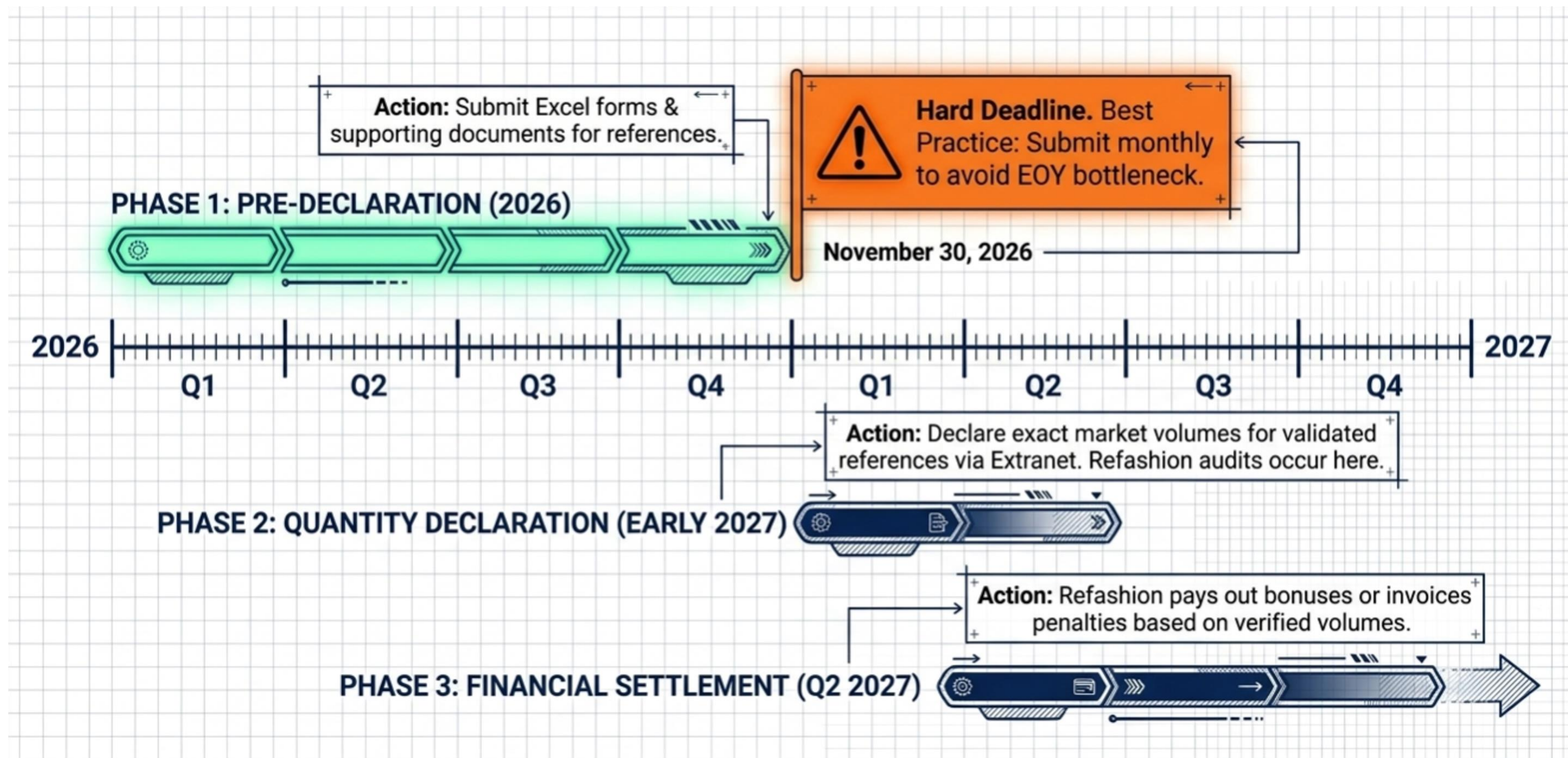
Recycled Materials Bonus
Rewards incorporation of
raw recycled materials
(Subject to proximity).



Recyclability Penalty
New for 2025. Financial
penalties for metalloplastic
fibres and electronic
components.

Zero Sum Equation: A product subject to any penalty is ineligible for any bonus

Administrative Timeline



Focus: Durability

“A **highly durable** item of textile apparel should have, among others, the following characteristics: high resistance to abrasion, tearing, pilling, colour-fastness, soiling, dimensional changes and seam slippage. It should have easily accessible information for repair and maintenance.

Moreover, a durable product should be desirable to the user for a long time. If textile apparel is modular, its priority parts should have easy physical access. Additionally, the process, tools and fasteners required for disassembly should be simple.”

Source: JRC Preparatory Study

Bonus per piece

		Bonus (in €) per item per category	
		Quantities ≤100 000 items	Mises en marché >100 000 items
1	Tops	€0.70	€0.07
2	Bottoms	€0.70	€0.07
3	Intimate products	€1.05	€0.105
4	Socks & hosiery	€0.35	€0.035
5	Outdoor clothing	€1.05	€0.105
6	Bath linen/towels	€1.05	€0.105
7	Bed linen	€0.70	€0.07
8	Table linen	€0.70	€0.07
9	Open footwear	€0.70	€0.07
10	Closed footwear	€0.70	€0.07
11	Indoor and baby footwear	€0.70	€0.07

Focus: Durability

Technical Requirements

Finished Product Testing: Tests must be carried out on finished products (not raw materials)

Accreditation: Tests must be performed by an ISO 17025 accredited laboratory with $\geq 65\%$ methods in scope

Validity: New products (2 years), Existing products (1 year)

Common CHF Tests

	Test description	ISO standard
Apparel	Dimensional change	ISO 5077
	Appearance after washing and drying	ISO 15487
	Abrasion resistance	ISO 12947-2
	Tear properties	ISO 13937-2
Footwear	Outsole abrasion	ISO 12770 / 20871
	Bond strength	ISO 17708
	Upper abrasion	ISO 17704
	Sole flexion	ISO 132

Strategic Consolidation

1

Unified Structure

Four Mandates.

eFiling • Forced Labor • DPP • EPR / Eco-Modulation

Every regulation in this session is a different interface to the same underlying data: materials, origin, chemistry, and custody.

Build the infrastructure once — every new regulation becomes a report you run, not a fire you fight.



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Q&A



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