REACH Batch-Release & Documentation Checklist

One printable page: the 11-step batch-release SOP, the documentation pack EU customs expects, the RSL failure rates to watch, and the supplier questions to ask. Drawn from the LantaoBags pre-shipment SOP and 500+ recent component lab tests.

1 The 11-step batch-release SOP

- ☐ Freeze the bill of materials — leather, lining, adhesive, hardware, edge paint
- ☐ Map high-risk zones (leather-specific vs component-specific tests)
- ☐ Collect pre-lab documents — tannery recipes, SDS files, corrective logs
- ☐ Flag high-risk chemistries against the brand RSL
- ☐ Sample the active lot — never showroom swatches
- ☐ Issue lab submissions — name the article, supplier and lot code
- ☐ Review results against the RSL — passing raw leather does not clear assembly
- ☐ Quarantine failures and trace the root cause to a vat or station
- ☐ Execute corrective action — retest only after a real recipe change
- ☐ Approve shipment — QC, compliance and sourcing all sign the release pack
- ☐ Archive the file for importer audits
- ☐ Re-screen the RSL every six months

2 Documentation pack for EU customs

- ☐ Supplier declaration tied to style and batch
- ☐ Accredited lab report with sample ID, method, date and results
- ☐ Component traceability sheet
- ☐ Corrective action history for past failures
- ☐ Final release approval record
- ☐ Importer-facing summary sheet

Customs checkpoint: the lab report article name must match your invoice exactly. If the report says "Black Leather" and the invoice says "Style 402", customs can reject it.

3 RSL hit-list & failure rates (our 500-test sample)

CHEMICAL CATEGORY	AFFECTED COMPONENT	OUR FAIL RATE	ROOT CAUSE
Chromium VI	Tanned leather	3.2%	Poor pH control
Heavy metals	Hardware	7.5%	Cheap metal alloys
Azo dyes	Textile linings	2.1%	Outdated formulas
Phthalates	Synthetic trims	10.9%	Low-cost plasticizers
SCCPs	Coatings	11.1%	Legacy waterproofing

Formaldehyde	Edge paint	6.6%	Cheap cross-linkers

2026 update — PFHxA: Annex XVII entry 79 (Commission Regulation (EU) 2024/2462) has been in force since 10 October 2026. Limits in homogeneous materials: **25 ppb** (PFHxA and its salts) or **1,000 ppb** (related substances). Request a PFHxA test for any water- or stain-repellent hide or coated fabric.

4 Supplier vetting questions

- ☐ Date of the last full-assembly chemical test?
- ☐ Specific batch traceability method?
- ☐ Formal formula-change notice process?
- ☐ Failure-response SLA for customs flags?
- ☐ Guaranteed documentation turnaround time?
- ☐ Do they test raw hide only, or the finished bag?

5 Final release decision

- ☐ Batch-linked lab evidence for this specific production run?
- ☐ Full assembly checked — glues, hardware, edge paint, not just raw leather?
- ☐ Compliance pack complete for importer review?
- ☐ Contingency plan for formula drift or a retest failure?

Guidance only — confirm all limits and test standards with your own QA team and an accredited lab.