

International Working Group on Global Organic Textile Standard
- Technical Committee -

Manual for the implementation of the Global Organic Textile Standard

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Principles

This document provides interpretations and clarifications for specific criteria of the Global Organic Textile Standard (GOTS) and related publications (e.g. the Licensing and Labelling Guide) approved by the Technical Committee (TC) of the International Working Group (IWG) where the current wording of the specific criteria could lead to (or already led to) inconsistent, inappropriate or even incorrect interpretation. It may further contain requirements for the application of the GOTS and the implementation of the related quality assurance system for certifiers.

This manual is to be seen as a flexible quality assurance tool of the TC to give advice and clarification to the GOTS approved certifiers and users of the GOTS where felt necessary as it can be up-dated short-term, however it does not deal with revision questions of the current standard version or even set any revised criteria.

The interpretations, corrections and further clarifications as provided with this document are binding for all GOTS *Approved Certifiers* and users of the GOTS. Any products already assessed and certified on basis of other interpretations which were also plausible with regard to the current wording of the GOTS retain their assessed / certified status. Any new assessments and certifications must be based on the official interpretations, corrections and clarifications as provided for in this document as soon as possible but no later than 12 months after their release unless no other / specific advice is given.

Preliminary remarks:

In the following the (relevant section of a) chapter of the GOTS is quoted where the interpretations, and further clarifications refer to.

In case not the whole wording of one chapter is quoted, the symbol '...' is used.

Official interpretations for specific criteria of the GOTS, Version 3.0

1.2 Scope and structure

... "The final products may include, but are not limited to fibre products, yarns, fabrics, clothes and home textiles." ...

Interpretation:

In principle any product that can be considered as a textile fibre product is covered under the scope of this standard. The standard does not cover products made from non-fibre materials such as leather, skin, hide or rubber.

A product can only be certified and labelled ('organic' or 'made with organic') as a whole. It is not possible to certify and label only a part or component of a product.

2.1 Requirements for organic fibre production

"Approved are natural fibres that are certified organic and fibres from conversion period certified according to a recognised international or national organic farming standard by a certification body that has a valid accreditation for the recognised standard it certifies against and is that IFOAM accredited or internationally recognised (according to ISO 65)." ...

Interpretation:

USDA NOP, EC 834/2007, national regulations from countries recognised on the list of third countries according to regulation EC 345/2008 (only if compliance with all relating specifications as of EC 345/2008 is assured) and standards that are approved to comply with the IFOAM Basic Standards (IBS) are considered as 'recognised international or national standards'. An organic farming standard is approved to comply with IBS if a certification body is accredited to it by the IFOAM accreditation body IOAS (as IOAS assesses whether a standard meets the IBS prior accrediting a certification body to it).

Further clarifications:

Organic fibre certification according to JAS is not possible. (-> per definition of JAS)

Certification of 'in conversion' (resp. 'in transition') status is not possible according to USDA NOP. (-> per definition of NOP)

The organic fibre production and certification for textile products to be sold in the USA and labelled 'organic' or 'made with organic' according to GOTS must be based on USDA NOP. (-> per USDA policy)

2.3 General Requirements for chemical inputs in all processing stages

2.3.1 Prohibited and restricted inputs

Substance group	Criteria
Aromatic solvents	Prohibited
Chlorophenols (including their salts and esters)	Prohibited (such as TeCP, PCP)

Substance group	Criteria
Complexing agents and surfactants	Prohibited are: - all APEOs (i.e. nonylphenol, octylphenol, APEOs terminated with functional groups, APEO-polymers) - EDTA, DTPA, NTA - LAS, α -MES
Fluorocarbons	Prohibited (such as PFOS and PFOA)
Formaldehyde and other short-chain aldehydes	Prohibited
Genetically modified organisms (GMO's) and their derivates (including enzymes derived from genetically modified organisms)	Prohibited
Halogenated solvents	Prohibited
Heavy metals	Prohibited, <i>inputs</i> must be 'heavy metal free'. Impurities must not exceed the limit values as defined in annex A. Exceptions valid for dyes and pigments are set in chapter 2.4.6. and 2.4.7.
Inputs containing functional nano-particles (= particles with a size 1-100 nm)	Prohibited
...	...
Organotin compounds	Prohibited (such as DBT, MBT, TBT, DOT, TPhT)
Plasticizers	Prohibited are: PAH, phthalates, Bisphenol A and all other plasticizers with endocrine disrupting potential
Quaternary ammonium compounds	Prohibited are: DTDMAC, DSDMAC and DHTDMAC
Substances and preparations that are prohibited for application in textiles with a recognised internationally or a nationally valid legal character	Prohibited
Substances and preparations having restrictions in usage for application in textiles with a recognised internationally or nationally legal character	The same restrictions apply, provide the <i>substances</i> and <i>preparations</i> are not already prohibited or have stricter restrictions criteria according to this standard. <i>Substances</i> listed in regulation EC 552/2009 (amending regulation EC 1907/2006 (REACH), annex XVII), and the 'candidate list of substances of very high concern for authorisation' of the European Chemicals Agency (ECHA) are prohibited.

Interpretation:

Most of the inputs listed in this sector as prohibited are banned under GOTS anyway as they do not meet the requirements related to hazards and toxicity of chapter 2.3.2. Reasons for still explicitly listing them in this chapter include public or sector specific attention to these substances.

The substances listed above are prohibited regardless if applied as pure substance or as

part of a preparation.

In particular preparations are prohibited if one or more of the substances of this section are present above the limit, above which the substance(s) need(s) to be declared in the MSDS (prepared according to one of the equivalent norms / directives as listed in chapter 2.3.3.). In a given case of doubt about the applicable limit, the respective GHS (Global Harmonised System) criterion is to be taken as decisive requirement.

Preparations containing substances of this section, for which the applicable norms / directives do not provide for a duty of declaration are prohibited if they contain these substances above a limit of 0,1%. These substances include especially nano particles as well as GMO's, their derivates and enzymes derived from GMO's.

References:

Regulation EC 552/2009:

<http://eur-lex.europa.eu/Notice.do?val=497250:cs&lang=en&list=497250:cs.&pos=1&page=1&nbl=1&pgs=10&hwords=552/2009~>

European Chemicals Agency (ECHA), candidate list:

http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

Substance group	Criteria
...	
Inputs with halogen containing compounds	Prohibited are <i>inputs</i> that contribute > 1% <i>permanent AOX</i> to primary effluent.
...	

...

and

Annex A) Definition: "AOX is permanent, if the molecular structure of the input contributes halogenated organic compounds to wastewater generated during fibre processing." ...

Interpretation:

Inputs with a total content of organically bound halogens > 1% can only be approved if it is plausible that the permanent AOX content is < 1%. To determine the plausibility parameters such as molecular structure, fixation rate and solubility in effluent are to be considered.

The applicable test method for contribution of halogenated organic compounds to wastewater in this context is the norm DIN EN ISO 9562.

2.3.2 Requirements related to hazards and toxicity

Substance group	Criteria
Inputs that are assigned to specific risk phrases (hazard statements) related to health hazards	... Prohibited are preparations that contain at least one substance that is assigned to any of these risk phrases or combinations thereof ...

Interpretation:

A *preparation* is prohibited if any of the risk phrases or combinations thereof as listed in this section is assigned or may be assigned at the time of application to it or to at least one of the contained *substances* in case it is present above the concentration limit, above which the *substance(s)* need(s) to be declared in the MSDS (prepared according to one of the equivalent norms / directives as listed in chapter 2.3.3.). In a given case of doubt about the applicable concentration limit, the 2001/58/EEC criterion is to be taken as decisive requirement - alternatively the equivalent GHS classifications will be considered.

References:

Global Harmonized System (GHS), 3rd revision 2009:

http://www.unece.org/trans/danger/publi/ghs/ghs_rev03/03files_e.html

Directive 67/548/EEC:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31967L0548:en:NOT>

Directive 1999/45/EC:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31999L0045:en:NOT>

Directive 2006/8/EC:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32006L0008:en:NOT>

Regulation EC 1272/2008:

[http://eur-](http://eur-lex.europa.eu/Notice.do?pos=4&hwords=1272%2F2008%7E&page=1&lang=en&pgs=10&nbl=6&list=516252:cs,500326:cs,485811:cs,486098:cs,485673:cs,496044:cs)

[lex.europa.eu/Notice.do?pos=4&hwords=1272%2F2008%7E&page=1&lang=en&pgs=10&nbl=6&list=516252:cs,500326:cs,485811:cs,486098:cs,485673:cs,496044:cs](http://eur-lex.europa.eu/Notice.do?pos=4&hwords=1272%2F2008%7E&page=1&lang=en&pgs=10&nbl=6&list=516252:cs,500326:cs,485811:cs,486098:cs,485673:cs,496044:cs)

2.3.3 Assessment basis for chemical inputs

“Basis for assessment of all chemical inputs (substances and preparations) is the Material Safety Data Sheet (MSDS), prepared according to an applicable recognised norm or directive. The Approved Certifiers should, where appropriate and felt necessary, include further sources of information (such as additional toxicological and environmental data on specific components of the auxiliary agents, test reports and independent lab analysis) in the assessment.

Certifiers with approval for this specific scope are authorised to issue conformity documents to the chemical supply industry listing the trade names of preparations that have been assessed and found to be compliant with the criteria of this standard.

All chemical *inputs* intended to be used to process *GOTS Goods* are subject to approval by a *GOTS Approved Certifier* prior to their usage.”

Interpretation:

“Applicable recognised norms or directives” according to which a MSDS of a chemical input (substance or preparation) has to be prepared in this context are:

- ANSI Z400.1-2004
- ISO 11014-1
- 1907/2006EEC (Reach)
- 2001/58/EEC
- GHS (Global Harmonised System)
- JIS Z 7250:2005, Part 1

“Certifiers with approval for this specific scope” in this context are those Approved Certifiers authorized for the scope: “Approval of textile auxiliary agents (chemical inputs) on positive lists” (= scope 4 of the ‘Approval Procedure and Requirements for Certification Bodies’,

chapter 4.2). The actual approval status of the certifiers can be checked on the website: <http://www.global-standard.org/certification/approved-certification-bodies.html>

Certifiers with approval for this scope are obliged to make their lists of approved chemical inputs available to all Approved Certifiers. The lists are to be taken as applicable tool for input assessment in the GOTS certification scheme by all Approved Certifiers. In case of conflicting decisions (product approved by one that is declined by another certifier), certifiers are requested to achieve consistent assessment by sharing their proofs of assessment. If this fails in last instance the Technical Director / Technical Committee of the IWG decides after screening the provided technical information on the chemicals in question.

2.4.6 Dyeing

Parameter	Criteria
Selection of dyes and auxiliaries	... Prohibited are azo dyes that release carcinogenic arylamine compounds (MAC III, category 1,2,3) Prohibited are (disperse) dyes classified as allergenic. ...

Specification:

Azo dyes MAC III, category 1 (with CAS no):

4-Aminobiphenyl (92-67-1)	2-Naphthylamine (91-59-8)
Benzidine (92-87-5)	o-Toluidine (59-53-4)
4-Chloro-o-toluidine (95-69-2)	

Azo dyes MAC III, category 2 (with CAS no):

o-Aminoazotoluene (97-56-3)	4,4'-Methylene-bis-(2-chloroaniline) (101-14-4)
2-Amino-4-nitrotoluene (99-55-8)	4,4'-Oxydianiline (101-80-4)
p-Chloroaniline (106-47-8)	4,4'-Thiodianiline (139-65-1)
2,4-Diaminoanisoole (615-05-4)	2,4-Toluylendiamine (95-80-7)
4,4'-Diaminobiphenylmethane (101-77-9)	2,4,5-Trimethylaniline (137-17-7)
3,3'-Dichlorobenzidine (91-94-1)	o-Anisidine (90-04-0)
3,3'-Dimethoxybenzidine (119-90-4)	2,4-Xylidine (95-68-1)
3,3'-Dimethylbenzidine (119-93-7)	2,6-Xylidine (87-62-7)
3,3'-Dimethyl-4,4'-diaminobiphenylmethane (838-88-0)	4-Aminoazobenzene (60-09-3)
p-Cresidine (120-71-8)	

Azo dyes MAC III, category 3 (with CAS no):

5-Chloro-2-methylaniline (95-79-4)	p-phenylenediamine (106-50-3)
N,N-Dimethylaniline (121-69-7)	

The following disperse dyes are prohibited (because of their allergenic potential):

Blue 1	Orange 1	Violet 93
Blue 3	Orange 3	Yellow 1
Blue 7	Orange 37	Yellow 3
Blue 26	Orange 76	Yellow 9
Blue 35	Orange 149	Yellow 23
Blue 102	Red 1	Yellow 39
Blue 106	Red 11	Yellow 49
Blue 124	Red 15	Yellow 54
Blue 291	Red 17	Yellow 64
Brown 1	Violet 1	

2.4.6 Dyeing and 2.4.7 Printing

Parameter	Criteria
Selection of dyes and auxiliaries	... The use of natural dyes and auxiliaries that are derived from a threatened species listed on the Red List of the IUCN is prohibited.

Reference:

Red List of the IUCN:
<http://www.iucnredlist.org/>

2.4.7 Printing

Parameter	Criteria
Selection of dyes, pigments and auxiliaries	... Prohibited are azo dyes and pigments that release carcinogenic arylamine compounds (MAC III, category 1,2,3) ...

Interpretation:

Prohibited azo pigments that may release carcinogenic amine compounds (*or generate the same in a chemical follow-up reaction) include:
Azo Pigment Red 8, Red 22, Red 23* and Red 38

2.4.11 Waste Water Treatment

“Wastewater from all wet processing sites must be treated in an internal or external functional wastewater treatment plant before discharged to surface waters.” ...

Interpretation:

The question whether a treatment plant is functional or not mainly depends on the inputs used in wet processing. For a unit only performing dyeing with natural dyes and auxiliaries, a simple biological treatment system may be appropriate whereas for an industrial unit working with chemical dyes and auxiliaries at least a 2-stage treatment plant is requested. Units using auxiliaries that are approved because of its adequate eliminability (e.g. acc. to OECD 302B) must in addition have a functioning treatment of the sludge.

... “Wastewater from wool scouring sites must, when discharged to surface waters after treatment (whether on-site or off site), have a COD content of less than 45 g/kg greasy wool.
... Wastewater from all other wet-processing sites must, when discharged to surface waters after treatment (whether on-site or off site), have a COD content of less than 20 g/kg of textile output expressed as an annual average.” ...

Clarification:

The applicable test method for COD determination is ISO 6060.
The applicable calculation method in this context is as following:
 $(C/1000) \times (V \times 1000) / (W \times 1000) = \dots \dots \dots \text{COD g/kg}$

with:

C (in mg/l) = COD concentration in water discharged to surface waters after treatment

V (in m³) = Volume of water discharged in the calculation period

W (in ton) = Weight of textile output in tonnage in the calculation period

... "The copper content must not exceed 0,5 mg/l." ...

Clarification:

The applicable test method to determine copper in wastewater is ISO 8288.

2.4.13 Record keeping & internal quality assurance

... "Certified Entities purchasing organic fibres must receive and maintain transaction certificates (=certificates of inspection), issued by a recognised certifier and certified in accordance with the criteria of chapter 1.4 for the whole quantity purchased.

Certified Entities purchasing GOTS Goods must receive and maintain a proof on the GOTS certified status (e.g. transaction certificate) issued by an Approved Certifier for the whole quantity of GOTS Goods purchased." ...

Interpretation:

Transaction Certificates (TCs) for 'organic' or 'organic in conversion' fibres and GOTS Goods shall contain the following minimum information:

- a. Name and address of the Certification Body that issued the certification;
- b. Name(s) and address(es) of the producer(s) / processor(s) of the certified products;
- c. Name and address of the consignee of the certified products;
- d. Name and address of the exporter of the certified products, if applicable;
- e. Name and address of the importer of the certified products, if applicable;
- f. The scope of the certification granted, including
 - The products certified, which may be identified by name and type and further be specified by net (and gross) weight, no. of pieces, length and codes or numbers (s.a. lot no., container no., bill of lading), whatever applicable
 - The fibre material composition of the products certified, if applicable
 - The basis for the certification:
 - The organic farming standard(s) (e.g. USDA NOP and/or EEC Organic Regulation 834/2007) that are the basis for certification of fibre production must be mentioned
 - GOTS must be mentioned as basis for processing certification
 - The certified status of the fibres ('organic' or 'organic-in conversion') resp. label grading of the GOTS Goods ('organic' resp. 'organic-in conversion' or 'made with (x%) organic materials' resp. 'made with (x%) organic-in conversion materials'), and
 - The effective date of certification.

Transaction Certificates (TCs) for organic (or organic 'in conversion') fibres should reflect the interpretation and clarifications as provided for chapter 2.1 of GOTS in this document. TCs for GOTS Goods issued on basis of an organic production standard or another processing standard cannot be accepted in the GOTS supply chain.

2.4.14 Technical quality parameters

Interpretation:

The following table provides for alternate acceptable test methods to the methods as provided for in GOTS. The criteria (fastness resp. dimensional change levels) are the same as for the respective main test method:

Parameters	Main test method	Alternate acceptable test methods
Rubbing fastness, dry for fibre blends	ISO 105x12	AATCC 8, DIN 54021, JIS L0849
Rubbing fastness, wet	ISO 105x12	AATCC 8, DIN 54021, JIS L0849
Perspiration fastness, alkaline and acid for fibre blends	ISO 105 E04	AATCC 15, DIN 54020, JIS L0848
Light fastness	ISO 105 B02	AATCC 16 option 3, DIN 54004, JIS L0843
Dimensional changes after washing at 40°C resp. at 30°C for animal fibre material and blends thereof. This criterion is only valid for the garment sector. ...	ISO 6330	AATCC 135 (fabrics) and 150 (garments), DIN 53920, JIS L1018
Washing fastness when washed at 60°C	ISO 105 C06 C1M	AATCC 61 option 3A (at 140°F), DIN EN 20105-C03, JIS L0844

2.4.15 Limit values for residues in GOTS Goods

and

2.4.16 Limit values for residues in additional materials and accessories

Parameter	Criteria	Test method
...
Glyoxal and other short-chain aldehydes	< 20 mg/kg <i>[respective]</i> < 300 mg/kg (no skin contact) < 75 mg/kg (skin contact) < 20 mg/kg (babywear)	Extraction, HMBT, Photometry UV/VIS
...		

Interpretation:

Aldehydes up to carbon no. 6 and both mono- and dialdehydes are considered as 'short chain aldehydes' in this context.

Since the prescribed method (photometry UV/VIS) is not appropriate to experimentally determine a detected aldehyde, a specific method for the short chain aldehydes and glyoxal such as GC/MS and LC/MS should be used.

Parameter	Criteria	Test method
...
Pesticides, sum parameter		
All natural fibres (except shorn wool), cert. organic	< 0.1 mg/kg	§ 64 LFGB L 00.00-34 (GC/MS); § 64 LFGB L 00.00-114 (LC/MS/MS)
Shorn wool, cert. organic	< 0.5 mg/kg	

[respective]

All natural fibres (except shorn wool)	< 0.5 mg/kg	§ 64 LFGB L 00.00-34 (GC/MS); § 64 LFGB L 00.00-114 (LC/MS/MS)
Shorn wool	< 1.0 mg/kg	
...		

Interpretation:

Pesticides relevant for testing in vegetable and animal fibres are listed below:

Name of pesticide	CAS No.	Applicable for testing in	
		Vegetable fib.	Animal fib.
2,3,5,6-Tetrachlorophenol	935-95-5	x	
2,4,6-Trichlorophenol	88-06-2	x	
2,4,5-Trichlorophenoxyacetic acid (2,4,5-T)	93-76-5	x	
2,4-Dichlorophenoxyacetic acid (2,4-D)	94-75-7	x	
Acetameprid	135410-20-7	x	
Aldrin	309-00-2	x	x
Atrazine	1912-24-9	x	
Azinphos	2642-71-9	x	
Azinphos-methyl	86-50-0	x	
Alpha- and beta-Endosulfan	959-98-8 33213-65-9	x	x
Bifenthrin	82657-04-3	x	
Bendiocarb	22781-23-3	x	
Bioresmethrin	28434-01-7		x
Bromophos-ethyl	4824-78-6	x	x
Buprofezin	69327-76-0	x	
Captafol	2425-06-1	x	
Carbaryl	63-25-2	x	x
Carbosulfan	55285-14-8	x	
Clethodim	99129-21-2	x	
Chlordane	57-74-9		x
Chlordimeform	6164-98-3	x	
Chlorpyrifos-ethyl	2921-88-2	x	x
Chlorpyrifos-methyl	5598-13-0	x	x
Chlorfenapyr	122453-73-0	x	
Chlorfenvinphos	470-90-6	x	x
Chlorfluazuron	71422-67-8	x	
Coumaphos	56-72-4	x	x
Cyfluthrin	68359-37-5	x	x
Cyhalothrin	91465-08-6	x	x
Cyflanilide	113136-77-9	x	
Cypermethrin	52315-07-8	x	x
DDD (op- and pp-)	53-19-0, 72-54-8	x	x
DDE (op- and pp-)	3424-82-6, 72-55-9	x	x
DDT, o,p-	789-02-6	x	x
DDT, p,p-	50-29-3	x	x
DEF/ 2,4 Dichlorodiphenyldichloroethane	78-48-8	x	
Deltamethrin	52918-63-5	x	x

Diafenthuron	80060-09-9	x	
Diazinon	333-41-5	x	x
Dichlofenthion	97-17-6		x
Dichlorprop	120-36-2	x	
Dichlorvos	62-73-7	x	x
Dicrotophos I	141-66-2	x	
Dieldrin	60-57-1	x	x
Diffubenzuron	35367-38-5		x
Dimethoate	60-51-5	x	x
Dinoseb and salts	88-85-7	x	
Diuron	330-54-1	x	
Empenthrin	54406-48-3		x
Endosulfansulfate	1031-07-8	x	x
Endrin	72-20-8	x	x
Esfenvalerate	66230-04-4	x	x
Ethion	563-12-2	x	x
Fenchlorphos	299-84-3	x	x
Fenitrothion	122-14-5	x	x
Fenthion	55-38-9		x
Fenpropathrin	39515-41-8	x	
Fenvalerate	51630-58-1	x	x
Fipronil	120068-37-3	x	
Flumethrin	69770-45-2		x
Heptachlor	76-44-8		x
Heptachlor epoxide	1024-57-3		x
Hexachlorobenzen (HCB)	118-74-1		x
Hexachlorocyclohexane - a-Lindane	319-84-6		x
Hexachlorocyclohexane - b-Lindane	319-85-7		x
Hexachlorocyclohexane - d-Lindane	319-86-8		x
Imidacloprid	138261-41-3	x	
Lindane	58-89-9	x	x
Lufenuron	103055-07-8	x	
Malathion	121-75-5	x	x
MCPA	94-74-6	x	
MCPB	94-81-5	x	
Mecoprop	93-65-2	x	
Metolachlor	51218-45-2	x	
Methomyl	16752-77-5	x	
Mevinphos	7786-34-7	x	
Methamidophos	10265-92-6	x	
Methoxychlor	72-43-5	x	x
Mirex	2385-85-5	x	
Monocrotophos	6923-22-4	x	
Parathion-ethyl	56-38-2	x	x
Parathion-methyl	298-00-0	x	x
Pendimethalin	40487-42-1	x	
PCP/ Pentachlorophenol	87-86-5	x	x
Permethrin	52645-53-1	x	x
Perthane	72-56-0	x	
Phosmet	732-11-6	x	
Phoxim / Baythion	14816-18-3	x	
Pirimiphos-ethyl	23505-41-1	x	x
Pirimiphos-methyl	29232-93-7		x
Profenophos	41198-08-7	x	
Prometryn	83653-07-0	x	
Pymetrozine	123312-89-0	x	
Propetamphos	31218-83-4		x
Pyrethrum	8003-34-7	x	x
Quinalphos	13593-03-8		x
Quintozine	82-68-8	x	
Teflubenzuron	83121-18-0	x	
Thiamethoxam	153719-23-4	x	
Tetrachlorvinphos	22350-76-1		x
Toxaphene	8001-35-2	x	

Telodrin	297-78-9	x	
Strobane	8001-50-1	x	
Transfluthrin	118712-89-3		x
Trifluralin	1582-09-8	x	
Triflumuron	64628-44-0		x
Thiodicarb	59669-26-0	x	
Thidiazuron	51707-55-2	x	
Tolclofos-methyl	57018-04-9	x	
Trifloxysulfuron-sodium	199119-58-9	x	

3. Minimum social criteria

3.1 Scope

... "For adequate implementation and assessment of the following specific criteria the corresponding key conventions of the International Labour Organization (ILO) have to be taken as the relevant basis for interpretation."

Interpretation:

The following ILO conventions 'correspond' to the specific GOTS minimum criteria:

- 3.2. Employment is freely chosen:
 - C29 - Forced Labour Convention
 - C105 - Abolition of Forced Labour Convention
- 3.3. Freedom of association and the right to collective bargaining are respected:
 - C87 - Freedom of Association and Protection of the Right to Organise Convention
 - C98 - Right to Organise and Collective Bargaining Convention
 - C135 - Workers' Representatives Convention
 - C154 - Collective Bargaining Convention
- 3.4. Working conditions are safe and hygienic:
 - C155 - Occupational Safety and Health Convention
- 3.5. Child labour must not be used:
 - C138 - Minimum Age Convention
 - C182 - Worst Forms of Child Labour Convention
- 3.6. Living wages:
 - C95 - Protection of Wages Convention
 - C131 - Minimum Wage Fixing Convention
- 3.7. Working hours are not excessive:
 - C1 - Hours of Work (Industry) Convention
 - C14 - Weekly Rest (Industry) Convention
 - C30 - Hours of Work (Commerce and Offices) Convention
 - C106 - Weekly Rest (Commerce and Offices) Convention
- 3.8. No discrimination is practised:
 - C100 - Equal Remuneration Convention
 - C111 - Discrimination (Employment and Occupation) Convention
- 3.9. Regular employment is provided
 - C158: Termination of Employment Convention
 - C175: Part-time Work Convention
 - C177: Homework Convention
 - C181 Private Employment Agencies Convention
- 3.10. Harsh or inhumane treatment is prohibited:
 - C100 - Equal Remuneration Convention
 - C111 - Discrimination (Employment and Occupation) Convention

Reference:

The mentioned conventions are published on the official ILO website:
<http://www.ilo.org/ilolex/english/convdisp1.htm>

4.1 Auditing of processing, manufacturing and trading stages

“Processors, manufacturers and traders of GOTS Goods must undergo an on-site annual inspection cycle (including possible additional unannounced inspections based on a risk assessment of the operations) and must hold a valid conformity certificate. *Traders* having an annual turnover with *GOTS Goods* less than 5000 € and retailers only selling to end consumers are exempt from the certification obligation; provide they do not (re-)pack or (re-)label *GOTS Goods*. *Traders* with less than 5000€ annual turnover with *GOTS Goods* must register with an *Approved Certifier* and must inform the same immediately after their annual turnover exceeds 5000€.” ...

Interpretation:

Depending on the kind of the organic fibre processed the following stages are considered as the first processing stages that must be GOTS certified:

- Ginning for cotton
- Retting for bast fibres
- Boiling and washing cocoons for silk
- Scouring for wools and other animal fibres (respective grading if this step is undertaken before scouring and not already covered by the organic farming certification)

The annual on-site inspection and certification obligation for the different stages in the supply chain of GOTS Goods can be summaries as following:

Processors and manufacturers:

certification is obligatory, provide they are not exempt by the *Approved Certifier* under the provision for ‘small-scale sub-contractors with a low risk potential’ (see interpretation advise below)

Traders (incl. import, export and wholesale entities):

certification is obligatory, if at least one of the following conditions are valid:

- they become proprietor of *GOTS Goods* (= buy and sell them) with an annual turnover with these products of at least 5000€
- they are engaged with packing or re-packing of *GOTS Goods*
- they are engaged with labeling or re-labelling of *GOTS Goods*.

Traders that are not obliged to become certified, because their annual turnover with GOTS Goods is less than 5000€ must register with an *Approved Certifier*. As soon as their turnover exceeds 5000€ they must inform the *Approved Certifier* and are under obligation of certification.

Retailers:

certification is obligatory, only if:

- they have – beside their retail activity – also a trade activity with GOTS Goods with an annual turnover of at least 5000€
- they are engaged with packing or re-packing of *GOTS Goods*
- they are engaged with labeling or re-labelling of *GOTS Goods*.

Approved Certifiers that have contracted more than 10 *GOTS Certified Entities* must conduct a minimum of 2% unannounced on-site inspections (or 1 inspection; whichever is greater) of certified facilities per year, chosen randomly and/or chosen taking into account the risk or threat to the organic integrity of the production or products.

The on-site inspection protocol shall at the very minimum undertake the following, as

applicable to the operator:

- a. Assessment of the processing system by means of visits to facilities and storage units (which may also include visits to non-organic areas if there is reason for doing so);
- b. Review of records and accounts in order to verify flow of goods (input/output reconciliation and the tracing back);
- c. Inspection of the chemical inputs (dyes and auxiliaries) and accessories used and assessment of their compliance with the applicable criteria of the GOTS;
- d. Identification of areas of risk to organic integrity;
- e. Inspection of the waste water (pre-)treatment system of wet processors;
- f. Verification of the operator's risk assessment of contamination and residue testing policy potentially including sample drawing for residue testing either as random sampling or in case of suspicion of contamination or non-compliance;
- g. Verification of adherence to the defined minimum social criteria (including confidential interviews of workers, if applicable);
- h. Verification that changes to the standards and to related requirements have been effectively implemented and
- i. Verification that corrective actions have been taken.

Conformity Certificates shall contain the following minimum information:

- a. The name and address of the operator whose products are the subject of certification;
- b. Name and address of the Certification Body that issued the certification documents;
- c. The scope of the certification granted, including
 - The products certified, which may be identified by type or range of products,
 - The standard that is the basis for the certification (=GOTS), and
 - The effective date and term of certification.

...”The responsible Approved Certifier may further decide on exceptions from the annual onsite inspection cycle for small-scale sub-contractors with a low risk potential regarding environmental and social criteria.” ...

Interpretation:

Operators employing not more than 10 production workers can be considered as ‘small-scale’ in this context. Units performing wet processing can generally not be considered as having a ‘low risk potential’ regarding environmental criteria whereas processors and manufacturers employing workers in developing countries can generally not be considered as having a ‘low risk potential’ regarding social criteria.

Accordingly Approved Certifiers may decide on exceptions from the annual onsite inspection cycle for units with no more than 10 employees performing job work for a certified entity such as home based working units and mechanical processing and manufacturing units in developed countries.

... “Basis for authorisation by the IWG is an accreditation of the certifier on basis of the IWG document ‘Approval Procedure and Requirements for Certification Bodies’ by the main co-operation partner of IWG for this process, IOAS, or another recognised accreditation body”.

Interpretation:

A general precondition for accepting application as GOTS Approved Certifier is an existing ISO 65 accreditation of the applicant (according to chapter ‘2. Principles’ of the ‘Approval Procedure and Requirements for Certification Bodies’). Beside IOAS authorised national or international accreditation bodies (such as IAF member) that have the necessary competence and confirm to the IWG that they follow the given procedures to accredit to the GOTS scope(s) are considered as ‘recognised accreditation bodies’.

4.2 Testing of Technical Quality Parameters and Residues

“Certified Entities are expected to undertake testing in accordance with a risk assessment in order to assure compliance with this standard and in specific with the criteria of chapter 2.4.14 (Technical Quality Parameters) as well as 2.4.15 and 2.4.16 (Limit Values for Residues in GOTS Goods, additional materials and accessories). All GOTS Goods and the components of these products should be included in this risk assessment and therefore potentially subject to testing. The testing frequency and the number of samples should be established according to this risk assessment.” ...

Interpretation:

Factors that should be considered – if applicable – in an appropriate risk assessment analysis:

- Kind of organic fibres used <-> pesticides and potential GM varieties commonly used if the same type of fibre would have been sourced conventional.
- Kind of additional conventional fibres and accessories used <-> pesticides and potential GM varieties commonly used in the case of natural fibres, prohibited additives commonly used for regenerated and synthetic fibres as well as accessories
- (Organic) natural fibre claims <-> non-natural substitutes used (e.g. natural bamboo fibre <-> rayon made from bamboo; linen and hemp <-> synthetic imitation fibres)
- Type and amount of approved chemical inputs used for GOTS Goods <-> any fastness problems known, problematic restricted inputs contained (e.g. AOX, copper) as well as prohibited substances commonly used in the same conventional process
- Separation measures in processing <-> sources of potential contamination from the parallel conventional processing stages performed in the unit
- Transport and storage conditions of GOTS goods <-> prohibited substances commonly used in transport and storage of comparable conventional products