



GLOBAL ORGANIC TEXTILE STANDARD  
ECOLOGY & SOCIAL RESPONSIBILITY

# MANUAL FOR THE IMPLEMENTATION OF GOTS

VERSION 8.0

BASED ON THE GLOBAL ORGANIC TEXTILE STANDARD (GOTS)

1<sup>st</sup> Revision Draft

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This document provides interpretations and clarifications for specific criteria of the Global Organic Textile Standard (GOTS) and related official reference documents (e.g. Conditions for the Use of GOTS Signs) of the Global Standard gGmbH where the current wording of the specific criteria could lead to (or may have 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 Approved Certifiers. This document also contains references for further study or details. Hyperlinks to these have been included, where possible.

This manual is to be seen as a flexible quality assurance tool to give advice and clarification to GOTS *Approved Certifiers* and users of GOTS where felt necessary as it can be updated 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/approved on the basis of other interpretations which were also plausible with regard to the current wording of the GOTS retain their assessed/certified/approved status.

The general implementation deadline to comply with a new version of this Manual is 12 months after its release unless other/specific advice is given.

GOTS welcomes corrections or further inputs to this document from all stakeholders. Comments may be sent to [revision@global-standard.org](mailto:revision@global-standard.org).

**Note:**

In this Manual, the relevant Sections of GOTS are quoted to which the interpretations and further clarifications refer to. Partial wording taken from GOTS is referred to/quoted as "...". In all cases, the wording from the Standard is to be considered final and definitive.

**How to Read this Document**

The following verbs are used to indicate requirements, recommendations, permissions, or capabilities in this document:

- “**shall**” indicates a mandatory requirement
- “**should**” indicates a recommendation
- “**may**” indicates a permission
- “**can**” indicates a possibility or capability

**Availability of documents:**

GOTS and the Manual for the Implementation of GOTS, reference documents and any further relevant public information as released by Global Standard gGmbH are available for public download on the [GOTS website](#)

**ABOUT GOTS**

Global Standard gemeinnützige GmbH is a not-for-profit organisation incorporated in Germany in 2002 for the purpose of administrating the Global Organic Textile Standard.

**Vision**

Our vision is a world where all textiles are produced in accordance with the principles of health, ecology, fairness and care to enhance people’s lives and the environment. Organic textiles are an integral part of this holistic approach.

**Mission**

Our mission is to ensure the highest level of social and environmental impact in textile value chains through voluntary sustainability standards and related activities. This includes the development, implementation, verification, protection and promotion of GOTS. This standard stipulates requirements throughout the supply chain for both ecological and labour conditions in textile and apparel manufacturing using organically produced raw materials. Organic production is based on a system of farming that maintains and replenishes soil fertility without the use of toxic, persistent pesticides or synthetic fertilisers. In addition, it includes welfare standards for animal husbandry and prohibits genetically modified organisms. Further information is available at: [www.global-standard.org](http://www.global-standard.org).

**Document History**

Release of Version 7.0: March 2023  
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Release of Version 7.2: September 2024

Further information is available at: [www.global-standard.org](http://www.global-standard.org).



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# THE OFFICIAL INTERPRETATIONS FOR SPECIFIC CRITERIA OF THE GLOBAL ORGANIC TEXTILE STANDARD (GOTS) VERSION 8.0

## GOTS SECTION 1

### GOTS Section 1.2

#### GOTS SECTION 1.2.1

“The final product categories may include, but are not limited to, fibres, yarns, fabrics, garments, textile accessories (carried or worn), textile toys, home textiles, mattresses, beddings as well as personal care textile products, and food contact textiles.”

#### INTERPRETATION

- a. In principle, any product that can be considered a textile fibre product is covered under the scope of GOTS.
- b. GOTS does not cover:
  - i. Textile fibre products containing electronic components
  - ii. Products made from non-fibre materials such as leather, skin or hide
- c. A textile fibre product, final or intermediate, can only be certified and labelled “organic” or “made with organic material” as a whole. It is not possible to certify and label only a part or a component of a product.
- d. **Combined Products:** Consumer products that are normally not classified as textile fibre products but containing textile fibre components, such as prams with textile fabrics, bassinets, car seats or furniture with textile fabric upholstery, may also be certified as a combined product. Combined products shall be labelled as per **Conditions for the Use of GOTS Signs**, as “Combined Product (name of component) certified to GOTS”, ensuring no ambiguity about which component of the final product is certified. Products that are certifiable to GOTS as a whole (e.g. textile bags, cotton buds, mattresses) cannot be considered for certification as a combined product.
  - i. Products/components that do not carry specific mention or requirements elsewhere within GOTS may be considered as Combined Products. It is the certifier’s responsibility to examine the remaining components regarding their overall compatibility with GOTS philosophy and to approve suitable labelling of such a product.

#### GOTS SECTION 1.2.4

“The Certified Entity shall follow GOTS criteria or the local legal requirements, whichever affords higher protection to people and the environment.”

#### INTERPRETATION

- a. GOTS sets criteria that are stringent yet practical and are relevant in major textile markets. Local or national legal requirements vary across the world.

- b. If the local laws provide higher protection to the environment or people, they shall be followed. Similarly, where local laws provide lower protection as compared to GOTS criteria, GOTS criteria would take precedence for the Certified Entities.
- c. This is applicable to all aspects of GOTS criteria, including environment, social, building safety, the legality of business, and so on.

### **GOTS SECTION 1.2.8**

“Certified Entities shall implement due diligence according to Section 4.1. and the relevant OECD guidance documents specified in the Manual for the Implementation of GOTS.”

### **GUIDANCE**

- Due diligence is the process Certified Entities should carry out to identify, prevent, mitigate and account for how they address actual and potential adverse impacts on human rights, the environment, and ethical business behaviour in their own operations, their supply chain and other business relationships.
- Due diligence management systems shall be implemented based on OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, OECD Due Diligence Guidance for Responsible Business Conduct, and the OECD Guidelines for Multinational Enterprises.
- Certified Entity is not expected to have a stand-alone management system for each GOTS Criteria. For example, a Certified Entity may adopt a comprehensive Policy on Responsible Business Conduct that may incorporate Environmental, Social and Governance Criteria. Alternatively, Certified Entity may implement stand-alone policies separately covering GOTS Human Rights and Social Criteria, Environmental Criteria and Governance Criteria.
- Certified Entity shall implement a management system that allows to identify, prevent, mitigate and account for how it addresses its actual and potential adverse impacts.
- Due diligence is conducted against the OECD Guidelines regarding specific adverse impacts (i.e. harm).
- A Certified Entity shall always consider the unique position of women at all stages of the due diligence process.
- A Certified Entity is expected to conduct due diligence on its own activities and on its suppliers across its supply chain and other business relationships.
- Due diligence is an ongoing exercise, recognising that risks of harm may change over time as the enterprise’s operations and operating context evolve.
- Certified Entities shall implement the Due Diligence Criteria as detailed in Section 4.1, adhering to the guidance specified in the Manual for the Implementation of GOTS, and in accordance with the provisions of the GOTS Due Diligence Handbook for Certified Entities. The guidance and interpretations within the [GOTS Due Diligence Handbook for Certified Entities](#) form an integral component of the due diligence framework. The GOTS Due Diligence Handbook for Certified Entities shall be used in conjunction with the relevant OECD Due Diligence guidance.
- GOTS Approved Certification Bodies shall consider the guidance and interpretations in the GOTS Due Diligence Handbook for Certified Entities as authoritative when verifying compliance with the GOTS due diligence criteria. GOTS Approved Certification Bodies shall also consider auditors’ guidance as provided by GOTS.

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## INTERPRETATION

- Adverse impacts can be considered harmful impacts on matters covered by the GOTS Human Rights and Social Criteria and Environmental Criteria, Governance Criteria (e.g. child labour, discrimination, hazardous chemicals, etc.).
- Risk refers to the risk of harm to individuals, other organisations and communities in relation to human rights, labour rights and the environment.
- For specific guidance on the essential characteristics of Due Diligence, see pages 16-19 of the OECD Due Diligence Guidance for Responsible Business Conduct.

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## REFERENCE

- OECD (2017), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector
- OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct
- OECD (2011), OECD Guidelines for Multinational Enterprises, OECD Publishing

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### GOTS SECTION 1.2.9

“GOTS sets criteria for working and social conditions that are equivalent to those of leading social sustainability standards.”

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## INTERPRETATION

- Considering that the core function of this Standard is verifying and certifying the processing of certified organic fibres, where a particularly high level of assurance of labour conditions is needed, applying a compatible specialised social standard or scheme is recommended.

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# GOTS SECTION 2

## GOTS Section 2.1

### GOTS SECTIONS 2.1.1 AND 2.1.2

“Approved are natural fibres that are certified 'organic' or 'organic in-conversion' according to any standard approved in the IFOAM Family of Standards for the relevant scope of the production (crop or animal production). This includes Regulation (EU) 2018/848, USDA's National Organic Program (NOP), APEDA's National Programme for Organic Production (NPOP), China Organic Standard GB/T19630.”

“A recognised certifier that certifies organic fibre production shall have a valid and recognised accreditation for the standard it certifies against. Recognised accreditations are ISO 17065 accreditation, NOP accreditation and IFOAM accreditation.”

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## REFERENCES

- [USDA NOP \(USA Organic Regulation\)](#)
- [List of NOP accredited certifiers](#)

- [APEDA NPOP](#)
- [EU 2018/848 \(EU Organic Regulation\)](#)
- [EC 889/2008](#)  
(providing implementation rules for EC 834/2007 regarding organic production, labelling and control)
- [EC 1235/2008](#)  
(providing implementation rules for EC 834/2007 regarding imports of organic products from third countries)
- [List of standards approved in the IFOAM Family of Standards](#)
- [List of IFOAM accredited certifiers](#)

### FURTHER CLARIFICATION

- Organic fibre certification according to JAS is not possible.
- Certification of 'in-conversion' (alternatively 'in-transition') status is not possible according to USDA NOP.
- The USDA policy memorandum "Labeling of Textiles That Contain Organic Ingredients" clarifies that textile products that are produced in accordance with GOTS may be sold as organic in the United States. A valid requirement in this context is that all of the fibres identified as organic in these textiles shall be produced and certified to the USDA NOP regulations.
- Legal requirements (e.g. with regard to organic fibre certification) may also apply in other countries and shall be respected.
- Reference: [USDA policy memorandum "Labelling of Textiles That Contain Organic Ingredients"](#)

### GUIDANCE

- ISO 20921:2019 - (Textiles - Determination of stable nitrogen isotope ratio), Annex A (identification procedure of organic raw cotton fibre by using stable nitrogen isotope ratio) may be used as an indicator to determine if cotton fibres have been cultivated using compost fertilisers.

### GOTS SECTION 2.1.4

“...and/or of animal welfare principles (e.g. mulesing)...”

### FURTHER GUIDANCE

- GOTS supports and recommends the implementation and use of animal welfare standards in animal fibre production.

## GOTS Section 2.2

### Certification and Auditing



## GOTS SECTION 2.2.1

“Processors, manufacturers, and traders of GOTS Goods shall become GOTS Certified Entities.”

### INTERPRETATION

- Depending on the kind of organic fibre processed, the following stages are considered as the first processing stages that shall be GOTS certified:
  - a. Ginning for cotton
  - b. Retting<sup>1</sup> for bast fibres
  - c. 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)
- For other types of fibres, the first processing step is what follows the steps covered in the organic production certificate of the raw material/fibre.

### FURTHER GUIDANCE

- If a gin has a valid certificate issued according to an accepted farm standard (GOTS Section 2.1.1), it should be accepted to the maximum possible extent. The Certifier should focus on the parameters not covered in the respective farm standard.
- Special requirements for cotton gins: cotton ginning units shall be independently certified to GOTS. Independently certified gins may be used as subcontractors by other GOTS certified companies following all other GOTS requirements.
- Should a field-level retting process be explicitly included and considered as part of the farm organic certification, the GOTS Certifier may certify the subsequent processing stage as the first certified process under GOTS, on the condition that the retting process does not pose harm to the ecology.

## GOTS SECTION 2.2.2

“Certification shall be based on an on-site annual inspection cycle, including possible additional unannounced inspections based on a risk assessment of the operations.”

### INTERPRETATION

- The inspection and certification obligation for the different stages in the supply chain of GOTS Goods can be summarised as follows:
  - a. Processors and manufacturers of GOTS Goods:  
Certification based on an annual on-site inspection is obligatory.
  - b. Subcontractors (in the field of processing and manufacturing) of GOTS Goods:  
Certification based on on-site inspection is obligatory.
  - c. Chemical Formulators (supplier):  
An on-site inspection is obligatory. For further information, please refer to interpretation of

GOTS Sections 4.2.4 and 4.2.5.

- d. Chemical Subcontractors (toll manufacturing):  
An on-site inspection is obligatory. For further information, please refer to interpretation of GOTS Sections 4.2.4 and 4.2.5.
- e. Traders (B2B) of GOTS Goods:  
Certification based on an annual on-site inspection is obligatory. (see section 2.2.5 in this document for exemptions).

## GENERAL GUIDANCE ON CERTIFICATION

- Approved Certifiers that have contracted more than 10 GOTS Certified Entities shall 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 and the risk for non-compliances related to GOTS Human Rights and Social Criteria in the facilities.
- The on-site inspection protocol with regard to environmental criteria shall, at the very minimum, undertake the following, as applicable to the inspected facility:
  - a. Assessment of the processing system by means of visits to processing and storage units which may also include visits to non-certified, third-party areas such as warehouses, fulfilment centres etc., if there is a reason for doing so, based on the risk assessment of Approved Certifiers
  - b. Review of records and accounts in order to verify the flow of goods (Volume Reconciliation (input/output/stock/production loss) 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 for product integrity
  - e. Inspection of the wastewater (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 that changes to the standards and to related requirements have been effectively implemented and
  - h. Verification that corrective actions have been taken.
- The on-site inspection protocol with regard to GOTS Human Rights and Social Criteria shall, at the very minimum, undertake the following, as applicable to the inspected facility:
  - a. Inspection of processing and storage units, toilet facilities, rest areas and other sites of the company with access for workers
  - b. Interview with management and confidential interviews with workers and workers' representatives
  - c. Review of personnel files, such as a list of workers employed, workers' contracts, payrolls, shift and working time protocols, age verification, social insurance documents
  - d. Verification that corrective actions have been taken
- Where verifiable results (audit reports) from the following internationally recognised social compliance schemes are available for the inspected facility, these should be screened and considered to the widest extent possible for the GOTS verification procedures:
  - a. Fair Wear Foundation (FWF)
  - b. Social Accountability 8000 (SA 8000)

- c. Worldwide Responsible Accredited Production (WRAP)
  - d. amfori BSCI
  - e. SMETA-Sedex report not older than 1 year
- Audit reports available need to be checked on their scope and quality in order to decide to which extent they can be used:
    - a. Is all relevant site data given (name, address, contact person, ownership, workforce, production process, production capacity, subcontractors included)?
    - b. Does it refer to all Human Rights and Social Criteria included in GOTS?
    - c. Is it based on sources of information that correspond to those covered by the above minimum on-site inspection protocol?
  - Where such verifiable audit reports are available based on an on-site inspection in the period of one year before the GOTS inspection takes place and indicate compliance with the applicable GOTS Human Rights and Social Criteria, a significant reduction of the audit time in these areas is considered reasonable. In general, Approved Certifiers need to ensure that sufficient audit time to verify compliance with both environmental and social criteria is planned for the on-site inspection considering size, the number of workers, location, processing steps and related risk potential for non-compliance of the applicable criteria. While it is reasonable that, e.g. in a complex wet processing unit in a developed country, considerably more audit time is spent verifying compliance with the environmental criteria, it is expected in a large garment manufacturing unit located in a developing country and not recently verified by another recognised social compliance scheme that considerably more audit time is spent verifying compliance with GOTS Human Rights and Social Criteria.
  - Where verifiable audit reports are available under ISO 14001 or EMAS based on an on-site inspection in the period of one year before the GOTS inspection, these should be considered to the widest possible extent towards compliance with GOTS environmental criteria. In specific, the Sedex Members Ethical Trade Audit (SMETA) Best Practice Guidance (Section 6.5.3) should be used as a framework to establish audit length and the number of individual interviews performed for inspections in developing countries where no verifiable results from any of the mentioned internationally recognised social compliance schemes are available.
  - Considering seasonal business and related specific challenges and high-risk situations for compliance with the Human Rights and Social Criteria in the ginning sector, GOTS inspections of ginning mills are to be planned and carried out during peak working season and during working hours when the mills are operating. Approved certification bodies ensure that every inspection carried out for ginning will be informed to GOTS Quality Assurance. They shall ensure that GOTS personnel can accompany any audits carried out during the ginning season and otherwise.

## FURTHER GUIDANCE

- For the definition of Developing Countries, reference is the World Economic Outlook reports by the IMF, published twice a year.

## REFERENCES

- [SMETA Best Practice Guidance document](#)
- [World Economic Outlook reports](#)

## GOTS SECTION 2.2.5

“... Exceptions for the certification of Traders and exception for the annual on site inspection of small scale subcontractors with a low-risk potential are defined in the Manual for the Implementation of GOTS...”

### INTERPRETATION

- Possible exemptions from the annual on-site inspection cycle under the provision for ‘small-scale subcontractors with a low-risk potential’ are provided as follows: Based on the details listed below, Approved Certifiers may decide on exceptions from the annual onsite inspection cycle for facilities which employ a total number of up to 10 ( $\leq 10$ ) production workers and performing job work for a certified entity such as home-based working units and mechanical processing and manufacturing facilities in developed countries.
  - a. Operators employing up to 10 ( $\leq 10$ ) production workers should be considered as ‘small-scale’ in this context.
  - b. On-site visits shall, however, take place at least every third year.
  - c. Units performing wet processing cannot be considered as having a ‘low-risk potential’ regarding environmental criteria.
  - d. Processors and manufacturers employing workers in developing countries can generally not be considered as having a ‘low-risk potential’ regarding Human Rights and Social Criteria.
  - e. Approved Certifiers shall document the risk assessment on which the decision to make use of exceptional rule is based on.
- Possible exception from certification for traders: Traders with any B2B activities such as import, export and wholesale entities: Certification based on annual on-site respective remote inspection as specified in GOTS is obligatory if at least one of the following conditions are valid:
  - a. they become proprietors of GOTS Goods (= buy and sell them) with an annual turnover with these products of at least 20.000 €.
  - b. they are engaged with packing or re-packing\* of GOTS Goods.
  - c. they are engaged with labelling or re-labelling\*\* of GOTS Goods.
- Remote inspections shall only be carried out for traders which do not have or subcontract any processing or manufacturing activities if the Approved Certifier is able to cover all applicable aspects of the below minimum inspections protocol without being on-site.
- Virtual inspections<sup>2</sup> may be considered for home-based trader offices provided that it is not involved in processing and the number of home-based office workers does not exceed 3.
- On-site visits need to take place at least every third year of granted certification. Every 3rd year of granted certification is to be interpreted as an on-site visit in the first year and every third year thereafter, that is Year 1- Year 3 - Year 6.
- Traders that are not obliged to become certified because their annual turnover with GOTS Goods is less than 20.000 € shall register with an Approved Certifier. In this context, the certified status of their supplier and the correct labelling of the GOTS Goods (with license number and certifier's reference of the supplier) should be verified. As soon as their annual turnover over GOTS Goods exceeds 20.000 €, they shall inform the Approved Certifier and are under an obligation of certification.

<sup>2</sup> Refer to section 2.2 of this document

- For the registration process please follow the guidance given in document Implementation Guidance for Registration of Traders.
- Registered traders can involve in trade activities with finished and intermediate GOTS Goods but cannot get involved in trades of raw/seed/lint fibres.
- Certification of (B2C) retailers is obligatory only if at least one of the following conditions is valid:
  - a. They have – besides their retail activity – also a B2B trade activity with GOTS Goods with an annual turnover of at least 20.000 €.
  - b. They are engaged with packaging or re-packaging\* of GOTS Goods.
  - c. They are engaged with labelling or re-labelling\*\* of GOTS Goods.

\* *Re-packing products from containers and redistributing them to new containers or removing bulk packaging by a (mail order) retailer and packing goods into boxes for shipping them to the consumer or packing into bags for handing them out to the consumer is not considered re-packaging. Handling of returned goods and repacking them for (re)sale is also not considered to be re-packaging. If, however, individual product packaging and/or product identification is removed and new packaging/labelling is attached, this is considered an activity which requires certification.*

\* *Re-labelling GOTS Goods is removing any GOTS Signs from any of the certified intermediate/finished products and/or attaching any GOTS Signs on certified intermediate/finished products for any reason.*

## GUIDANCE RELATED TO REMOTE AUDITS

Remote audits and inspection activities can be considered as either “partial”, when only some parts are conducted remotely, or “full”, when all parts are completed remotely.

Remote audits or inspection activities may be conducted as per the direction given in one or a combination of the following:

- a. Off-site desktop review: When documentary evidence or data is submitted for review by a competent authority audit/inspection team to confirm required activities have been undertaken or outcomes achieved. These data could include photographic and/or pre-recorded video footage.
- b. Virtual audit: Where a competent authority uses electronic means to obtain audit evidence remotely, including video conferencing, accessing local IT systems, real-time video streaming, and evaluate it objectively in order to determine the extent of conformity to the audit criteria, just as during an on-site audit.
- c. Live video-streaming: When live video footage is streamed from an audit or inspection site guided by an auditor or inspector of the competent authority observing real-time operating conditions.

## GOTS SECTION 2.2.9

“...The basis for authorisation by the Global Standard gGmbH is an accreditation of the Certification Body, in accordance with ‘Approval Procedure and Requirements for Certification Bodies’, by the main co-operation partner of the Global Standard gGmbH for this process, IOAS Inc., or another recognised Accreditation Body.”

## INTERPRETATION

- A general precondition for accepting an application as a GOTS Approved Certifier is an existing ISO 17065 accreditation of the applicant (according to GOTS Section 2.2.9. Principles of the “Approval Procedure and Requirements for Certification Bodies”). Besides, IOAS authorised national or international accreditation bodies (such as IAF members) that have the necessary competence and confirm to the Global Standard gGmbH that they follow the given procedures to accredit to the GOTS scope(s) are considered as ‘recognised accreditation bodies’.

#### FURTHER GUIDANCE

- For risk assessment in textile supply chains, Approved Certifiers and Certified Entities should further refer to OECD Due Diligence Guidance.

#### REFERENCE

- OECD (2018), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, OECD Publishing, Paris.

## GOTS Section 2.3

“Scope Certificate”

#### INTERPRETATION

- Detailed mandatory instructions with regard to policy, layout, format and text/codes for issuing Scope Certificates (SCs) are provided in the ‘Policy for the Issuance of Scope Certificates’ document that is available on the GOTS website. Approved Certifiers are responsible for issuing SCs for Certified Entities, with corresponding information such as product categories that Certified Entities can offer in compliance with GOTS as well as processing steps and activities that are qualified for GOTS certification. The entire list of GOTS certified suppliers is accessible on the GOTS website.

#### REFERENCE

- [www.global-standard.org](http://www.global-standard.org)

## GOTS Section 2.4

“Transaction Certificate”

#### INTERPRETATION

- Detailed mandatory instructions with regard to policy, layout, format and text/codes for issuing Transaction Certificates (TCs) are provided in the ‘Policy for the Issuance of Transaction Certificates’ document that is available on the GOTS website.
- TCs shall be requested by a Certified Entity through their chosen Approved Certifier whenever necessary.
- An uncertified retailer may request TCs from its GOTS certified suppliers to ensure that the whole volume of shipment purchased is indeed GOTS certified. TC shall be issued by the Approved Certifier of the supplier.

- TCs can be issued to a (un)certified retailer as long as the products carry GOTS Signs.

## REFERENCE

- [www.global-standard.org](http://www.global-standard.org)

## GOTS Section 2.5

### GOTS SECTIONS 2.5.3 AND 2.5.4

“Certified Entities purchasing unprocessed organic fibres shall receive and maintain scope certificates and transaction certificates (if applicable) from the originating producer, issued by a recognized certifier and certified in accordance with the criteria of Section 2.1 for the whole quantity purchased.”

“Certified Entities purchasing GOTS Goods (intermediate and finished) shall receive and maintain GOTS Scope and Transaction Certificates, issued by an Approved Certifier for the whole quantity of GOTS Goods purchased, in accordance with [the Policy for the Issuance of Scope Certificates](#) and the [Policy for the Issuance of Transaction Certificates](#).”

## INTERPRETATION

- Transaction Certificates (TCs) for organic or for organic in-conversion fibres should reflect the interpretation and clarifications as provided for GOTS Section 2.1 in this document. TCs for GOTS Goods issued on the basis of an organic production standard or another processing standard cannot be accepted in the GOTS supply chain.
- Detailed mandatory instructions regarding policy requirements, layout, format and information for issuing GOTS Transaction Certificates (TCs) in the GOTS processing/trading chain are provided in the ‘Policy for the Issuance of Transaction Certificates’. The Policy and accompanying documents/templates are available on the GOTS website.
- The maximum period that a single Transaction Certificate may cover is 90 calendar days from the date of the first shipment to the date of the last shipment.
- Multiple shipments are possible under certain conditions as described in the current TC Policy.

## FURTHER GUIDANCE

- For the purposes of traceability and operation of the Global Trace-Base (under development), information about the first certified organic fibre input is required to be collected and maintained by the Certified Entity. Data would need to be maintained in a suitable document, such as a spreadsheet, in a prescribed format.
- The format is being developed in harmonisation with Textile Exchange and will contain details of the Scope Certificate(s) of fibre producer(s) / producer group(s) along with the quantity of purchased fibre(s).

### GOTS SECTION 2.5.10

“Certified Entities shall collect, collate, and share non-commercial information related to impact measurement if and as required by GOTS.”

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## INTERPRETATION

- There will be no mandatory requirement for commercially sensitive data such as financial, business, or technical information to be shared by Certified Entities. Information requested will only be related to measuring public-facing impact. Examples of such information are the number and break-up of employees, energy sources, water sources etc.

## GOTS Section 2.6

### GOTS SECTION 2.6.1

#### GOTS SECTION 2.6.1.4

“Transportation means, and shipping documents shall be documented”

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## GUIDANCE

- Shipping documents may include Forwarders Certificate of Receipt (FCR-1 and/or FCR-2), Bill of Lading, shipping bill.

#### GOTS Section 2.6.1.5

“In cases where pesticides/biocides are mandated for use due to national or regional rules or law, they may be used in storerooms / transport, but they shall comply with the applicable international or national organic production standard...”

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## GUIDANCE

- Should national or regional laws mandate the use of such pesticides/biocides during storage or transport that do not comply with organic production standards, they may be allowed for use with the express requirement that every precaution shall be taken in order to prevent any contamination of these with the certified organic product(s) being stored/transported.

### GOTS SECTION 2.6.2

#### GOTS SECTION 2.6.2.2

“Single use of virgin plastic hangers is prohibited in retail packaging of GOTS Goods. Recycled plastic hangers may be used.”

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## INTERPRETATION

- As there is currently no widespread and globally applicable certification system for recycled plastic hangers, for the time being, a certification is not mandatory to prove the use of recycled plastic for hangers (from pre- or post-consumer waste).
- As a minimum, a ‘declaration’ issued by the producer/trader of the single-use plastic hanger that it is made from 100% recycled materials from pre- or post-consumer waste shall be adequate.



- Examples of certified recycled material are GRS/RCS Standard. Further relevant certification programs/verification proofs may be recognised.

#### **GOTS Section 2.6.2.4**

“Bioplastic packaging produced from non-GMO biomass sources and certified/tested to be non-toxic, biodegradable and home or industrially compostable can be used.”

#### **GUIDANCE**

- Biodegradability test for plastic packaging:
  - a. Soil ASTM D5988
  - b. Freshwater ASTM D5271/EN29408
  - c. Marine ASTM D6691
- Compostability test for plastic packaging:
  - a. Industrial ASTM D6400/EN 13424:2000
  - b. Home ASTM D6400/EN 13432:2000 Lower Temp Conditions

#### **GOTS Section 2.6.2.5**

“Paper or cardboard used in packaging material for the retail trade of GOTS Goods (incl. labelling items such as hangtags) shall be recycled from pre- or post- consumer waste or certified according to a program that verifies compliance with sustainable forestry management principles.”

#### **INTERPRETATION**

- As there is currently no widespread and globally applicable certification system for recycled paper/cardboard, for the time being, a certification is currently not mandatory to prove the use of recycled paper/cardboard (from pre- or post-consumer waste).
- As a minimum, a ‘declaration’ issued by the producer/trader of the paper/cardboard that it is 100% recycled from pre- or post-consumer waste shall be available. Examples of certified recycled material are GRS/RCS Standard.
- Recognised certification programs verifying compliance with sustainable forestry management principles are Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification Schemes (PEFC) and Rainforest Alliance.
- Further relevant certification programs/verification proofs may be recognised as equivalent in future. In such case, the decision will be published by the Global Standard gGmbH (through an updated issue of this manual or first on the corresponding website <http://www.global-standard.org/the-standard/manual-for-implementation.html>).

#### **GOTS Section 2.6.2.6**

“Accepted additional fibres, see Section 3.2 (without limitation on fibre percentages), and shall meet the residue limit values in Section 5.2.8.”

## INTERPRETATION

- Additional fibres in GOTS Section 3.2 can be used for textile packaging materials or strings for the hangtags without restriction on fibre percentage. For example:
  - a. 100% lyocell fibre and 100% recycled polyester can be used.
  - b. Virgin polyester or conventional cotton or acrylic fibres cannot be used.

## GOTS Section 2.7

### GOTS SECTIONS 2.7.4 (C) AND (D)

“A reference to the Approved Certifier who certified the GOTS Goods”

“The licence number of the Certified Entity”

## GUIDANCE

- A reference to the Approved Certifier can be the certifier’s name, short form and/or its logo.
- The licence number of the Certified Entity is the number provided by the Approved Certifier and stated on the Scope Certificate.

### GOTS SECTION 2.7.5 AND 2.7.6

"Organic" or "organic in-conversion" label grades shall be no less than 95% ( $\geq 95\%$ ) of the fibre content of the products (excluding accessories)."

"Made with (x%) organic materials" or "made with (x%) organic in-conversion materials" label grades shall be no less than 70% ( $\geq 70\%$ ) of the fibre content of the products (excluding accessories)."

## INTERPRETATION

- Percentage figures in this section and others always refer to those when tested under standard atmospheric conditions. Standard atmospheric conditions for testing are as specified in ISO 139 Textiles - Standard Atmospheres for Conditioning and Testing: 65%  $\pm$  4% relative humidity and 20°C  $\pm$  2°C.

### GOTS SECTION 2.7.8

“Labelling of GOTS Goods sold in retail is mandatory.”

## GUIDANCE

- In the absence of GOTS on-product signs on retail products, any claims, advertisements, or references to the Standard are strictly prohibited and shall not be used.
- An (un)certified retailer can receive Transaction Certificates from their certified supplier only for those products which carry GOTS Signs.
- Sellers of GOTS Goods are expected to ensure that they request TCs only for correctly labelled GOTS Goods via their respective Approved Certifiers.
- Labelling of GOTS Goods shall follow the latest version of ‘Conditions for the Use of GOTS Signs’. Labelling of final consumer-ready GOTS Goods to be sold in retail to an

end-consumer is mandatory. Consumer-facing final products which are produced according to GOTS criteria but do not carry GOTS Signs cannot be referred to as GOTS Goods.

- An (un)certified retailer can receive Transaction Certificates from their certified supplier only for those products which carry GOTS Signs.
- Sellers of GOTS Goods are expected to ensure that they request TCs only for correctly labelled GOTS Goods via their respective Approved Certifiers.
- Labelling of GOTS Goods shall follow the latest version of 'Conditions for the Use of GOTS Signs'.

## GOTS SECTION 3

### GOTS Section 3.2

“Additional Fibre Materials”

#### INTERPRETATION

- Conventional cotton is not permitted as an additional fibre material at any level, which means that all cotton fibres that can be used in a GOTS Good shall be either organic or organic in-conversion.
- Conventionally grown cotton fibre, even if it is non-GMO and/or recycled, is not permitted as additional fibre.
- Mechanically recycled organic fibres shall originate from pre-consumer waste of GOTS Goods (intermediate or finished) at GOTS-certified entities and shall be recycled under a GOTS-certified entity. Such mechanically recycled organic fibres may be used as additional fibre up to 30%. This is allowed as long as the Certification Body is satisfied with the traceability and mass balance of the offered raw material. “Mechanical recycling” as a process category shall be listed under the Scope Certificate of such a Certified Entity.
- Mohair, a fibre derived from the angora goat, is permitted as an additional fibre, provided it satisfies conditions given in GOTS Sections 3.2 and 5.2.8.
- Table 5.2.7 lists the residue limits for finished GOTS Goods therefore any blended additional fibre should not violate the limit.
- Virgin polyester is not permitted as an additional fibre material. All polyester fibres blended in a GOTS Good, under GOTS Section 3.2.1 and 3.2.2, shall be (thermo-mechanically or chemically) recycled from pre-or post-consumer waste.
- Animal fibres that are certified to a standard that includes animal welfare principles are encouraged to be used as additional fibre materials.
- Wool fibres used in GOTS Goods that come under GOTS Sections 3.1 and 3.2 shall come from mulesing-free sources. Current adequate proof for verification of non-mulesed wool by Approved Certifiers shall include:
  - a. Certification to an IFOAM Standard that explicitly prohibits mulesing.
  - b. Where "a" does not apply and wool fibre is sourced from regions where mulesing is officially prohibited, a declaration by the producer shall be obtained that includes a reference to the source of the official prohibition.
  - c. If the wool fibre is sourced from regions that mulesing has not been practiced traditionally, then a declaration from the producer shall be obtained.

- d. If any of the above conditions is not fulfilled, or wherever available, an additional third-party certification shall be considered as adequate proof for the non-mulesed status of the wool. Those schemes may include (but are not limited to) Responsible Wool Standard (RWS) by Textile Exchange, ZQ Merino, New Merino etc.

### FURTHER GUIDANCE

- Adequate verification proof for the use of regenerated fibres from certified organic raw materials is certification of the fibre supplier/manufacturer and the fibre material to the Organic Content Standard (OCS from Textile Exchange).
- Recognised certification programs verifying compliance with sustainable forestry management principles are Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification Schemes (PEFC) and Rainforest Alliance.
- Adequate verification proof for the use of recycled natural and synthetic fibres is certification of the fibre supplier/manufacturer and the fibre material to the Recycled Claim Standard (RCS from Textile Exchange), the Global Recycle Standard (GRS from Textile Exchange), Recycled Content Standard (from Scientific Certification Systems).
- Example of **possible fibre compositions** according to GOTS 7.0:
  - 70% organic cotton, 30% lyocell from organic sources
  - 70% organic wool, 20% recycled polyamide, 10% virgin polyurethane
- Example of fibre **compositions that are not possible** according to GOTS 7.0:
  - 70% organic cotton, 30% recycled polyester
  - 75% organic wool, 25 % recycled polyester

### REFERENCES

- [Content Claim Standard \(CCS, Textile Exchange\)](#)
- [Organic Content Standard \(OCS, Textile Exchange\)](#)
- [Global Recycle Standard \(GRS, Textile Exchange\)](#)
- [Recycled Claim Standard \(RCS, Textile Exchange\)](#)
- [Recycled Content Standard \(Scientific Certification Systems\)](#)
- [Forest Stewardship Council \(FSC\)](#)
- [Programme for the Endorsement of Forest Certification Schemes \(PEFC\)](#)
- [Responsible Wool Standard \(RWS, Textile Exchange\)](#)
- [Rainforest Alliance](#)

## GOTS Section 3.3

### GOTS SECTION 3.3 – MATERIALS IN GENERAL

“... (valid for appliqué, borders, buckles, buttons and press-studs, cords, edgings, elastic bands and yarns, embroidery yarns, fasteners and closing systems, adhesive tapes used for fusing, hatbands, lace used as decoration, linings, inlays, interface, labels (heat-transfer/ adhesive/ care/ GOTS), interlinings, pocket liners, seam bindings, sewing threads, shoulder pads, padding for undergarments, trims, zippers, soles in footwear and any other not explicitly listed accessories).”

## INTERPRETATION

- The use of decorative accessories on GOTS goods shall not exceed 15% of the product's total weight and 40% of its total surface area coverage. A decorative accessory refers to any material used to enhance the appearance of a product, such as lace, sequins, embroidery, etc.
- Mattress, shoes (with complete upper part fabric such), and combined products are excluded from a weight limitation of decorative accessories. Components used in such products including support, frame, rubber sole etc should be considered functional accessories.
- If tapes or labels used on a certified material come with a pre-applied adhesive should be considered accessories and shall meet the criteria as per GOTS Section 5.2.8.
- Adhesive products (such as glue) used on a certified product (e.g. for mattress, personal care products, pasting embellishments) shall be assessed and approved prior to use. Such adhesive chemicals are not to be seen as accessory.
- **Microplastic Restrictions for Accessories:** The use of decorative glitter on GOTS-certified goods is subject to the following restrictions:
  - i. Prohibited Glitter:
    - Decorative glitter composed of of insoluble\* and non-biodegradable\*\* plastic is strictly prohibited.
  - ii. Permissible Glitter:
    - Glitter that is water-soluble, biodegradable, natural, or inorganic may be used.
    - Plastic glitter may also be used if it meets the following conditions:
      - It is firmly affixed to the certified product for decorative purposes.
      - It is designed in a manner that prevents release during normal use and laundering.
  - iii. Testing Requirements:
    - \* Determination of polymer solubility test – Regulation (EC) No 1907/2006 Annex XVII Appendix 16, OECD Guideline 120
    - \*\* Biodegradability testing – Regulation (EC) No 1907/2006 Annex XVII Appendix 15, OECD Guideline 301B

## GOTS SECTION 3.3 – SUPPORTS AND FRAMES

“Latex foam used in mattresses shall be made from certified organic or organic in-conversion latex or from latex certified according to a program that verifies compliance with sustainable forestry management principles.”

## INTERPRETATION

- Adequate verification proof for organic latex can be the Global Organic Latex Standard (GOLS).
- Recognised certification programs verifying compliance with sustainable forestry management principles are Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification Schemes (PEFC) and Rainforest Alliance.
- For materials from threatened animals, plants and timber please refer to Red List of the IUCN.

## REFERENCE

- [Global Organic Latex Standard \(GOLS\)](#)
- [Red List of the IUCN](#)

## GOTS SECTION 3.3 – FILLINGS, STUFFING

“If textile fibres are used, the material shall be certified to organic or organic in-conversion (fillings with textile fibres are not considered accessories).

If non-textile material is used, only natural materials are permitted. Natural materials shall be from certified organic or organic in-conversion production in case such certification is applicable for the kind of material used (e.g. for plant-based materials such as grain spelt or animal based-materials such as feathers).”

### GUIDANCE

- In case textile fibres are used for the purpose of filling/stuffing of a certified textile cover, the weight of the filling can be included into fibre percentage calculation for the GOTS label grade.
- In case non-textile fibres are used for the purpose of filling/stuffing of a certified textile cover, the weight of the filling cannot be included into fibre percentage calculation for the GOTS label grade.

# GOTS SECTION 4

## GOTS Section 4.1

### GOTS SECTION 4.1.1

#### GOTS Section 4.1.1 (i)

“The Certified Entity shall embed its due diligence process into its policies and management systems.”

### GUIDANCE

- Certified Entity’s Policy on Responsible Business Conduct (RBC) shall:
  - a. Be based on the OECD Guidelines for Multinational Enterprises and relevant international human rights standards, listed under GOTS Section 4.4.1.
  - b. Include commitments regarding Certified Entity’s own activities and articulate Certified Entity’s expectations of its business partners – including suppliers, licensees and intermediaries – across the full length of its supply chain.
  - c. Include a commitment to incorporate due diligence into the decision-making process at an organizational level.
  - d. Cover GOTS Chemical Input Criteria, GOTS Environmental Criteria, GOTS Human Rights and Social Criteria, and GOTS Governance Criteria and issues identified as sector risks in the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.
  - e. Include commitments to conduct due diligence on the Certified Entity’s most significant risks in its own operations and in its supply chain.
  - f. Include a commitment to responsible sourcing practices, meaning that the Certified Entity commits to preventing its contribution to harmful impacts through its sourcing practices.



- g. Stipulate the Certified Entity's expectations regarding the use of subcontractors by direct suppliers, when relevant, including a definition of "subcontract" and distinctions in subcontracted work if they exist.
- h. Put forth the Certified Entity's expectations regarding the outsourcing to homeworkers and the use of handwork, where relevant to the Certified Entity's business models.
- i. Include a commitment to meaningful engagement with affected stakeholders through the course of due diligence.
- j. Include a commitment to hear and address all complaints against the Certified Entity regarding its own operations regardless of how they are raised.
- k. Include a commitment to hear and address measured and substantiated complaints that the Certified Entity has caused or contributed to harm in its supply chain raised through legitimate processes.
- l. Be approved at the most senior level of the Certified Entity.

### NATURE OF THE POLICY

- The Certified Entity's RBC policy may consist of one single policy or several stand-alone policies or be integrated into wider governance documents such as the code of conduct or principles of business ethics.
- The Certified Entity's RBC policy may also build on existing policies and commitments.

### ADOPTING AND UPDATING THE POLICY

- The Certified Entity's RBC policy shall be developed with and informed by relevant internal and external expertise and approved at the most senior level of the company.
- The Certified Entity's RBC policy shall be tailored and adapted to the Certified Entity's most significant risks.
- The Certified Entity's RBC policy shall not be a static document. It shall be updated through an iterative process that builds on increasing knowledge about risks of harm in the enterprise's supply chain and on input from internal and external stakeholders.

### COMMUNICATING THE POLICY

- RBC policy shall be made publicly available and communicated to all employees, suppliers, business partners, and other relevant parties.

### REFERENCES

- a. [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- b. [OECD \(2017\), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#)
- c. [GOTS Due Diligence Handbook for Certified Entities, v.1.1, released on 23 September 2024, See Section 4.2 Embedding Responsible Business Conduct \(Step 1\)](#)

#### **GOTS Section 4.1.1 (ii)**

"The Certified Entity shall identify actual or potential adverse impacts associated with the Certified Entity's operation."

### GUIDANCE

1. The Certified Entity scopes the risk of harm in its own operations and in its supply chain.

- The Certified Entity conducts scoping exercises with a particular view on risks of non-compliance with GOTS Chemical Input Criteria, GOTS Environmental Criteria, GOTS Human Rights and Social Criteria and GOTS Governance Criteria. The scoping exercise shall take into account:
  - a risk that may be specific to the products that the Certified Entity makes or sells,
  - specific factors of the countries of its operation,
  - factors that may be specific to the Certified Entity's sourcing model,
  - components of the Certified Entity's business model that may increase the likelihood or scope of risks in its supply chain.
- The Certified Entity determines which risks of harm are most significant in its own operations and in its supply chain and prioritises those for action.
- The Certified Entity documents the scoping exercise.
- The Certified Entity consults with stakeholders and experts concerning matters which require additional information.
- The Certified Entity reviews the findings of the scoping assessment on a semi-regular basis.
- The Certified Entity continually updates the information, feeding into its understanding of the risks of harm and accounts for changing circumstances.

## **2. The Certified Entity conducts a self-assessment of its own operations.**

- The Certified Entity performs a self-assessment of its own operations to determine the extent of risks and actual impact.
- The Certified Entity follows GOTS Criteria and other existing credible guidance for employers when assessing for risk of harm in its own operations.
- The Certified Entity engages with potentially affected stakeholders (workers, trade unions and representative organisations) to identify potential and actual harm in its own operations.
- The Certified Entity reviews its policies and systems to assess the extent to which risks are being prevented or mitigated.
- The Certified Entity seeks external support to conduct a self-assessment if the impact may cause severe harm if not prevented, and the prevention measures require technical expertise not available in-house.

## **3. The Certified Entity assesses suppliers associated with high risk for harm at the site level.**

- The Certified Entity assesses suppliers associated with a higher risk of those harms prioritised during the scoping exercise at the site level. For these purposes, the Certified Entity shall select suppliers based on the severity and likelihood of the risk of harm, not their position in the supply chain. The following considerations shall be taken into account when identifying the supplier for such an assessment:
  - the country of operation with specific risks,
  - production processes with specific risks (e.g. wet processing is a high risk for hazardous chemicals),
  - harms or risks of harm identified in previous supplier assessment.
- Where severe risks are linked to upstream processes (e.g. cotton growing), the Certified Entity seeks assurances that the prioritised suppliers upstream are being assessed.
- The Certified Entity conducts supplier assessments when there are information gaps or the context has likely changed.
- The Certified Entity shall use multiple sources of information.
- The Certified Entity assesses:
  - the measures that the supplier has implemented to prevent harm,
  - the actual harm on the ground and risks of harm,



- the extent to which the workers are aware of their rights, in particular about their human and labour rights,
- whether the supplier has established an operational-level grievance mechanism and whether it is effective,
- The extent and nature of the assessment correspond to the potential risks and is adapted to the local context. For labour and human rights issues, workers are involved in designing assessments.
- In case of discrepancies between actual findings and expected findings Certified Entity shall adjust the assessment methodology.
- Persons conducting the assessment shall know the local context and national and international standards related to the adverse impact.
- The Certified Entity shall conduct suppliers' assessment in a gender-sensitive manner.

#### **4. The Certified Entity assesses its relationship to impacts.**

- The Certified Entity makes good faith efforts to understand whether it has caused, contributed to, or is linked to its identified impacts.
- The Certified Entity takes immediate actions to top existing impacts.

### **REFERENCES**

- a. [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- b. [OECD \(2017\), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#)
- c. [GOTS Due Diligence Handbook for Certified Entities, v.1.1, released on 23 September 2024, Ref. Section 4.3 Identifying and Assessing Adverse Impacts \(Step 2\)](#)

#### **GOTS Section 4.1.1 (iii)**

“The Certified Entity shall cease, prevent or mitigate adverse impacts.”

### **GUIDANCE**

#### **1. The Certified Entity seeks to prevent or mitigate harm in its own operations.**

- The Certified Entity shall cease actions that are causing or contributing to harm and take immediate steps to stop existing adverse impacts in its own operations.
- The Certified Entity establishes and implements a plan to prevent or mitigate future harm in its own operations.
- The Certified Entity takes immediate actions to prevent any immediate and critical danger in the short term.
- The Certified Entity seeks to develop outcome-oriented solutions that lead to the prevention of harm in the longer term.
- The Certified Entity's plan to prevent and mitigate harm includes clear follow-up timelines. The measures pursued to prevent and mitigate harm are proportionate to the severity of harm. Based on the level of risk, the Certified Entity shall consider seeking expert advice.
- Workers, trade unions and representatives of the workers' own choosing are engaged during the development of the Certified Entity's measures to prevent and mitigate labour-related issues (in the Certified Entity's own supply chain).
- The Certified Entity shall consult international standards and guidance when developing preventive measures.

#### **2. The Certified Entity Seeks to prevent or mitigate harm in its supply chain.**

- The Certified Entity develops and implements its own plan to seek to prevent or mitigate future harm in its supply chain.
- If a risk of contributing to harm in the supply chain is identified, the Certified Entity develops and implements a plan to prevent its contribution to harm. Such a plan should always include clear timelines.
- The Certified Entity develops pricing models that account for the cost of wages, benefits and investments in decent work.
- The Certified Entity shall implement internal measures to manage risks in its supply chain. These include measures that the Certified Entity itself can control.
- The Certified Entity seeks to prevent/mitigate risks through its product development.
- The Certified Entity has a good, local knowledge of its suppliers.
- The Certified Entity shall use its leverage to influence its supplier to prevent or mitigate impacts.
- The Certified Entity implements control measures to prevent contributing to harm through its purchasing practices even if it has not identified specific instances of this. There is a system of procedures to follow in instances where purchasing practices could contribute to harm.
- When appropriate, the Certified Entity disengages from the supplier to prevent adverse impacts on its supply chains.
- If the Certified Entity determines the need to disengage from the supplier, it complies with national laws, international labour standards, and terms of collective bargaining agreements.
- If disengaging from a supplier, the Certified Entity provides information supporting the business decision to management and the union (if one exists) of the supplier.
- If disengaging from a supplier, the Certified Entity gives the supplier sufficient notice of the end of the relationship.
- As long as a Certified Entity has an ongoing relationship with a supplier, it demonstrates its efforts to mitigate the identified adverse impact(s).

### **GOTS ENCOURAGES CERTIFIED ENTITIES**

- to pool leverage with other buyers, especially in cases where they do not hold the leverage,
- to establish incentives for suppliers to comply with the RBC policy,
- to support suppliers in preventing or mitigating impacts,
- to engage with the government to prevent or mitigate adverse impacts.

### **REFERENCES**

- [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- [OECD \(2017\), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#)
- [GOTS Due Diligence Handbook for Certified Entities, v.1.1, released on 23 September 2024, See Section 4.4 Cease, Prevent and Mitigate Adverse Impacts \(Step 3\)](#)

#### **GOTS Section 4.1.1 (iv)**

“The Certified Entity shall track implementation and results”

## GUIDANCE

### 1. Verify, monitor and validate progress on due diligence and its effectiveness in the Certified Entity's own operations.

- The Certified Entity has implemented assurance mechanisms to assess whether its due diligence requirements are being met in its own operations.
- The Certified Entity monitors due diligence and risk management on an ongoing basis using appropriate performance indicators.
- The Certified Entity draws on all known information, including data from ongoing monitoring, periodic internal assessments, issues raised through grievance mechanisms, etc., to validate that the steps taken by the enterprise are preventing and mitigating impacts.
- In instances in which harmful impacts have not been effectively prevented or mitigated, the Certified Entity seeks to understand why this is the case and responds appropriately.
- The Certified Entity engages with external experts to validate the effectiveness of due diligence and risk management measures where impacts may cause severe harm if not adequately prevented or where prevention measures require technical expertise.

### 2. Verify, monitor and validate progress on due diligence and its effectiveness in the supply chain.

- The Certified Entity implements assurance mechanisms to assess whether its due diligence requirements are being met in its supply chain.
- Whenever possible, the Certified Entity shall monitor indicators, either direct or indirect, to validate that impacts have been prevented.
- The Certified Entity draws on all known information, including data from ongoing monitoring, periodic internal assessments, issues raised through grievance mechanisms, etc., to validate that the steps taken by the Certified Entity are preventing and mitigating impacts.
- In instances in which harmful impacts have not been effectively prevented or mitigated, the Certified Entity seeks to understand why this is the case and responds appropriately, including by updating and implementing corrective action plans where appropriate and seeking external guidance.

## GOTS ENCOURAGES CERTIFIED ENTITIES

- To involve external experts in assessing the effectiveness of due diligence and risk management measures undertaken in the supply chain. External experts should, in particular, be involved where impacts in the supply chain may cause severe harm if not adequately prevented or where prevention measures require technical expertise.

## REFERENCES

- [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- [OECD \(2017\), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#)
- [GOTS Due Diligence Handbook for Certified Entities, v.1.1, released on 23 September 2024, See Section 4.5 Tracking Implementation and Results \(Step 4\)](#)

### GOTS Section 4.1.1 (v)

“The Certified Entity shall communicate how impacts are addressed”

## GUIDANCE

### 1. Communicate publicly on the Certified Entity's due diligence process, including how the Certified Entity has addressed potential and actual harm.

- The Certified Entity communicates publicly on:
  - a. its supply chain due diligence,
  - b. its due diligence management system,
  - c. the most significant risks in its own operations and within its supply chain.
  - d. its processes for assessing risks,
  - e. its plan to prevent and mitigate harm in its own operations and progress on those measures. Note: This criterion relates to a Certified Entity's most significant risks,
  - f. its plan to prevent and mitigate harm in its supply chain and progress on those measures,
  - g. its objectives for government policy engagement and the outcomes of engagement efforts (if relevant),
  - h. how it has meaningfully engaged with its stakeholders,
  - i. the processes that provide access to remediation in its own operations,
  - j. processes that provide access to remediation in its supply chain,
  - k. the collaborative processes it engages that facilitate due diligence.
- The Certified Entity communicates publicly, at a minimum, on an annual basis.
- The Certified Entity's communications shall be in a form and frequency reflecting its human rights impacts.
- The Certified Entity's communications shall provide sufficient information to evaluate the adequacy of its response to human rights impacts within the Certified Entity's operations and supply chain.
- Information is communicated in a way that is relevant, accurate, clear, user friendly with plain language and is presented in a way that the intended users can access information.
- The Certified Entity shall ensure its communications do not pose risks to affected stakeholders.

### 2. Communicate with affected stakeholders (for Human Rights).

- The Certified Entity is prepared to communicate how it addresses its human rights impacts.
- If the Certified Entity's operations or operating contexts pose a risk of severe human rights impacts, the enterprise reports formally on how they are addressed.
- Communications are accessible to impacted stakeholders.
- The Certified Entity shall communicate with its workers, trade unions, and representative organisations of the workers' own choosing.

## REFERENCES

- a. [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- b. [OECD \(2017\), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#)
- c. [GOTS Due Diligence Handbook for Certified Entities, v.1.1, released on 23 September 2024, See Section 4.5 Communicating How Impacts Are Addressed \(Step 5\)](#)

## GOTS Section 4.1.1 (vi)

“The Certified Entity shall enable remediation when appropriate”

### GUIDANCE

#### 1. Establish processes to enable remediation in the Certified Entity's own operations (e.g. Operational level grievance mechanisms).

- An operational-level grievance mechanism is a formalised means through which individuals or groups can raise concerns about the impact a Certified Entity has on them – including, but not exclusively, on their human rights – and can seek remedy.
- The Certified Entity has established a process to enable remediation in relation to human rights impacts.
- The Certified Entity shall establish processes to enable remediation for adverse impacts other than human rights impacts (e.g. labour or environmental impacts).
- Where a grievance mechanism is established, it is based on the core criteria:
  - a. Legitimacy;
  - b. Accessibility;
  - c. Predictability;
  - d. Equitability;
  - e. Transparency;
  - f. Being dialogue-based.
- Where a grievance mechanism is established, it does not preclude access to judicial recourse (e.g. through legal waivers) for victims of gross human rights violations, and the enterprise does not interfere with civil or criminal investigations or human rights examinations.
- The Certified Entity's grievance mechanism shall not undermine the role of local grievance mechanisms, including judicial and non-judicial mechanisms and the role of trade unions in addressing labour disputes.
- GOTS encourages Certified Entities:
  - a. to consult existing guidance on establishing operational-level grievance mechanisms.
  - b. to publish complaints.

#### 2. Commit to hearing and addressing complaints raised through legitimate processes (a non-operational level mechanism).

- The Certified Entity engages in legitimate processes that enable it to hear material and substantiated complaints against it that it has caused or contributed to harm in its supply chain.
- Where a grievance mechanism is established, it is based on the core criteria:
  - a. Legitimacy;
  - b. Accessibility;
  - c. Predictability;
  - d. Equitability;
  - e. Transparency;
  - f. Being dialogue-based.
- Where a grievance mechanism is established, it does not preclude access to judicial recourse (e.g. through legal waivers) for victims of gross human rights violations, and the enterprise does not interfere with civil or criminal investigations or human rights examinations.



- GOTS encourages Certified Entities:
  - a. to consult existing guidance on establishing supply chain grievance mechanisms.
  - b. to publish complaints.

**3. The Certified Entity provides for or contributes to remedy in cases where it has caused or contributed to adverse impacts**

- Remedy seeks to restore the affected person(s) to the situation they would be in had the harm not occurred.
- Remedy meets national laws and international guidelines, and where standards are not available, the remedy is consistent with previous cases.
- The Certified Entity engages with affected stakeholders in the determination of the remedy.
- The Certified Entity assesses the level of satisfaction with the process and the outcome of those who raised the complaints.

**REFERENCES**

- a. [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- b. [OECD \(2017\), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#)
- c. [GOTS Due Diligence Handbook for Certified Entities, v.1.1, released on 23 September 2024, Ref. Section 4.7 Provide or Cooperate in Remediation where Appropriate \(Step 6\)](#)

**GOTS SECTION 4.1.5**

“The Certified Entity shall strengthen its management systems to conduct due diligence in Certified Entity’s own operation and in its supply chain.”

**GUIDANCE**

The Certified Entity shall consider the following steps to strengthen its management systems:

- The Certified Entity shall ensure business units (e.g., sourcing, design, responsible business conduct) share feedback from due diligence to promote continuous improvement.
- The Certified Entity shall ensure due diligence information is communicated to relevant decision-makers, ensuring it is timely and sufficient for risk management.
- Decisions that may increase risk shall involve multiple business units to ensure comprehensive risk assessment.
- Buying units shall have access to ongoing and updated due diligence information to inform purchasing decisions and align them with risk management strategies.

**REFERENCES**

- d. [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- e. [OECD \(2017\), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#)
- f. [GOTS Due Diligence Handbook for Certified Entities, v.1.1, released on 23 September 2024, Ref Section 4.2.2 Strengthening Management Systems](#)

**GOTS SECTION 4.1.6**

“The Certified Entity shall assign oversight and responsibility for due diligence to relevant senior management and assign board-level responsibilities for implementing the Policy on Responsible Business Conduct...”

## INTERPRETATION

- The Certified Entity shall establish or strengthen corporate governance to oversee and support Responsible Business Conduct (RBC), including assigning board and senior management level accountability for guiding the company’s approach and implementation of RBC.
- Senior staff members responsible for implementing the Certified Entity’s RBC Policy and GOTS Human Rights and Social Criteria shall give adequate attention and support to due diligence on human rights, labour, environment and integrity risks and allocate resources accordingly.
- The Certified Entity shall secure adequate staff time and ensure that those who work on supply chain due diligence have the competence to perform their duties.

## GOTS Section 4.2

### GOTS SECTION 4.2.1

## GENERAL GUIDANCE AND INTERPRETATION

- “Applicable recognised norms or directives” according to which an SDS of a chemical input (substance or preparation) shall be prepared in this context are:
  - a. ANSI Z400.1/Z129.1:2010
  - b. ISO 11014-1
  - c. EC 1907/2006
  - d. EC 2020/878
  - e. EC 2015/830
  - f. GHS (Globally Harmonised System of Classification and Labelling of Chemicals)
  - g. JIS Z 7253:2012
- In specific, valid reasons for the inclusion of further sources of information in the assessment include:
  - a. SDS does not represent a legally binding basis in the country/region where the input is marketed.
  - b. Input potentially contains restricted or prohibited substances for which a declaration in the SDS is not binding (e.g. AOX, endocrine disruptors, GMO (derived) material or enzyme, nanoparticles)
  - c. SDS does not contain certain ecological or toxicological information required to assess compliance with related GOTS criteria
  - d. Tests/methods used to determine certain ecological or toxicological values are not specified or do not correspond to those listed in the GOTS criteria
  - e. Spot checking on the accuracy of certain ecological or toxicological information provided on the SDS
  - f. Surveillance of impurities

- For the details of the chemical assessment procedure, “Approval of Textile Chemical Inputs on the GOTS Positive List (Scope 4)” is accessible on the GOTS website: <http://www.global-standard.org/certification/how-to-get-chemical-inputs-approved.html>
- Certifiers who are active in Scope 4 shall make their lists of approved chemical inputs available to all Approved Certifiers of GOTS. The lists are to be taken as an applicable tool for input assessment in the GOTS certification scheme by all Approved Certification Bodies.
- Certifiers responsible for the approval of chemical products shall ensure that all approval decisions are made on the basis of valid SDS, based on knowledge of all relevant endpoints for each constituent of formulations. Relevant endpoints are, for example, values used for the formulation of Hazard Statements and/or their GHS equivalents for an individual constituent.
- 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 the last instance, the responsible person for Standards Development & Quality Assurance / Standards Committee of the Global Standard gGmbH decides after screening the provided technical information on the chemicals in question.
- The approval status of a chemical input, in other words, the validity of an LoA, shall last for 3 years or until a new version of GOTS comes into force, whichever is earlier. Based on the risk assessment of the Scope 4 auditor, the validity period may be shorter than 3 years. However, the Additives Registration Fee shall be paid once for the validity period of the current Standard version
- Basic chemicals (such as salt, alkali, acid, etc.) used do not need to be released on Letters of Approval.

## GOTS SECTION 4.2.2

“Prohibited and restricted inputs”

### INTERPRETATION

- Most of the chemical inputs listed in this Section as prohibited are banned under GOTS as they do not meet the hazards and toxicity related requirements in GOTS Section 4.2.3. The reasons for explicitly listing them in this Section are due to their relevance in the textile sector and/or the public attention to these substances.
- Listed chemicals are prohibited regardless of application as a pure substance or as part of preparation. Preparations are prohibited if one or more of the prohibited substances of this Section are intentionally added/present as a functional component at any level. Any unavoidable contaminations and impurities of such substances shall not exceed the limits given in the table following this interpretation. In case any chemical (and/or group) is not explicitly mentioned in these interpretations or lists or tables, the respective Globally Harmonised System of Classification and Labelling of Chemicals (GHS) criterion is to be taken as a decisive requirement.
- Chemical inputs that knowingly release any of the prohibited substances in the list during the normal application or usage conditions are prohibited.
- For functional nanoparticles as well as GMO containing or derived inputs, the applicable norms/ directives do not provide for a duty of declaration in the SDS. Any unavoidable contaminations and impurities of these substances shall not exceed 0.1%.
- Recombinant DNA (self-cloning), DNA sequencing, gene editing, gene engineering, cell fusion are considered genetic modification techniques, therefore, inputs produced by such methods are prohibited.
- Inputs are also prohibited if there is validation that their designated use in textiles leads to any exceeding residue limits of the parameters listed in GOTS Section 5.2.7.



## REFERENCES

- [Regulation EC 552/2009](#)
- [European Chemicals Agency \(ECHA\), candidate list](#)

## GUIDANCE

- While the Standard prohibits and/or restricts the use of a number of chemical inputs, it is also recognised by the Standards Committee of GOTS that certain unintended by-products/ contaminants may be found in chemical inputs arising from the synthesis route/manufacturing complexities of such inputs. GOTS, therefore, recommends the following maximum contamination limits for chemicals. It is expressly understood that this list and limits contained therein are dynamic and will be reviewed periodically at each revision of GOTS or if found necessary due to changes in regulations/research/commercial requirements.
- The limits mentioned in the table below are meant only for unintended by-products or contaminants and should not be considered as a dilution of GOTS requirements for Chemical Inputs, as detailed in GOTS Sections 4.2.2 and 4.2.3.
- For many of these parameters, standard test methods may not be available. In such cases, modified test methods should be used for the detection and quantification of contaminants. As per GOTS requirements, tests should be carried out by suitably qualified laboratories with adequate testing experience in the field of textile chemical inputs for these parameters.
- See also further interpretation guidelines for certain chemical groups

SR.	SUBSTANCE GROUP	CONTAMINATION DETECTION LEVEL
1	<b>Aromatic and/or halogenated solvents</b>	
	1,1-Dichloroethane (75-34-3)	1 mg/kg
	1,2 dichloroethane (107-06-2)	5 mg/kg
	Methylene chloride (75-09-2)	5 mg/kg
	Trichloroethylene (79-01-6)	40 mg/kg
	Tetrachloroethylene (127-18-4)	5 mg/kg
	Tetrachlorotoluene (5216-25-1)	5 mg/kg
	Trichlorotoluene / Benzotrichloride (98-07-7)	5 mg/kg
	Benzylchloride / Chloromethyl benzene (100-44-7)	5 mg/kg Dyes – 100 mg/kg
	Benzene (71-43-2)	50 mg/kg
	Aromatic solvents such as xylene, o-Cresol, p-Cresol, m-Cresol	500 mg/kg
	Dimethylformamide (DMF) (68-12-2)	50 mg/kg
	Dimethylacetamide (DMAC) (127-19-5)	50 mg/kg
	Toluene (Toluol)( 108-88-3)	10 mg/kg
N-methyl-2-pyrrolidone (872-50-4)	50 mg/kg	
2	<b>Flame Retardants</b>	
	Tri-o-cresyl phosphate (78-30-8)	Individually 50 mg/kg
	Trixylyl phosphate (TXP) (25155-23-1)	
	Trimethyl Phosphate (512-56-1)	
	Tris(2 chloroethyl)phosphate (TCEP) (115-96-8)	Individually 250 mg/kg
Decabromodiphenyl ether (DecaBDE) (1163-19-5)		

Tris(2,3, dibromopropyl) phosphate (TRIS) (126-72-7)	
Pentabromodiphenyl ether (PentaBDE) (32534-81-9)	
Octabromodiphenyl ether (OctaBDE) (32536-52-0)	
Bis(2,3 dibromopropyl)phosphate (BIS) (5412-25-9)	
Tris(1 aziridiny)phosphine oxide (TEPA) (545-55-1)	
Polybromobiphenyls (PBB) (67774-32-7, 59536-65-1)	
Tetrabromobisphenol A (TBBPA) (79-94-7)	
Hexabromocyclodecane (HBCD) (25637-99-4)	
2,2 bis(bromomethyl) 1,3 propanediol (BBMP) (3296-90-0)	
Hexabromocyclododecane (HBCDD) (3194-55-6)	
2-Ethylhexyl-2,3,4,5-tetrabromobenzoate (TBB) (183658-27-7)	
Bis(2-ethylhexyl)-3,4,5,6-tetrabromophthalate (TBPH) (26040-51-7)	
Isopropylated triphenyl phosphate (IPTPP) (68937-41-7)	
Tris(1-chloro-2-propyl) phosphate (TCPP) (13674-84-5)	
Tris(1,3-dichloro-2-propyl) phosphate (TDCPP) (13674-87-8)	
Triphenyl phosphate (TPP) (115-86-6)	
Bis(chloromethyl) propane-1,3-diyltetrakis (2-chloroethyl) bisphosphate (V6) (38051-10-4)	
Antimony (7440-36-0)	
Antimony trioxide (1309-64-4)	
Boric Acid (10043-35-3, 11113-50-1)	
Decabromodiphenyl (DecaBB) (13654-09-6)	
Dibromobiphenyls (DiBB) (multiple)	
Dibromopropylether (21850-44-2)	
Heptabromodiphenyl ether (HeptaBDE) (68928-80-3)	
Hexabromodiphenyl ether (HexaBDE) (36483-60-0)	
Monobromobiphenyls (MonoBB) (Multiple)	
Monobromobiphenyl ethers (MonoBDEs) (Multiple)	
Nonabromobiphenyls (NonaBB) (Multiple)	
Nonabromodiphenyl ether (NonaBDE) (63936-56-1)	
Octabromobiphenyls (OctaBB) (Multiple)	
Polybromobiphenyls (Polybrominated biphenyls) / Polybromobiphenyle (Polybromierte Biphenyle) (PBBs) (59536-65-1)	
Tetrabromodiphenyl ether (TetraBDE) (40088-47-9)	
Tribromodiphenyl ethers (TriBDEs) (Multiple)	
Triethylenephosphoramidate (TEPA) (545-55-1)	
Biboron trioxide (1303-86-2)	
Disodium octaborate (12008-41-2)	
Disodium tetraborate, anhydrous (1303-96-4, 1303-43-4)	
Tetraboron disodium heptaoxide, hydrate (12267-73-1)	
<b>3 Chlorinated Benzenes and Toluenes</b>	
1,2-dichlorobenzene (95-50-1)	500 mg/kg
All isomers of tri-, tetra- chlorotoluenes	10 mg/kg

	Other isomers of mono-,di-,tri-,tetra-,penta- and hexa- chlorobenzene and mono-,di-, and penta, chlorotoluene	Sum: 200 mg/kg
<b>4</b>	<b>Chlorophenols (including their salts and esters)</b>	
	Tetrachlorophenols (TeCP)	Sum: 20 mg/kg
	Pentachlorophenol (PCP)	
	Monochlorophenol and isomers Dichlorophenol and isomers Trichlorophenols and isomers	Sum: 50 mg/kg
<b>5</b>	<b>Complexing agents and surfactants</b>	
	Nonylphenol (NP), mixed isomers (104-40-5, 11066-49-2, 25154-52-3, 84852-15-3) Octylphenol (OP), mixed isomers (140-66-9, 1806-26-4, 27193-28-8)	250 mg/kg
	Octylphenol ethoxylates (OPEO) (9002-93-1, 9036-19-5, 68987-9-06) &Nonylphenol ethoxylates (NPEO) (9016-45-9, 26027-38-3, 37205-87-1, 68412-54-4, 127087-87-0)	500 mg/kg
	EDTA, DTPA, NTA	500 mg/kg
	LAS, α-MES	500 mg/kg
<b>6</b>	<b>Endocrine disruptors</b>	<b>X Prohibited</b>
<b>7</b>	<b>Formaldehyde and other short-chain aldehydes (such as Glyoxal)</b>	150 mg/kg
<b>8</b>	<b>Heavy Metals</b>	Refer to the definition of "Heavy Metal Free" in Section 7 of GOTS
<b>9</b>	<b>Inputs (e.g. azo dyes and pigments) releasing arylamines with carcinogenic properties (MAK III, category 1,2,3) and Aniline, free, (category 4)</b>	
	Banned Amines	150 mg/kg
	Aniline (free)	150 mg/Kg
	Navy Blue Colourant	250 mg/kg
	Carcinogenic or Allergenic (Disperse) Dyes	250 mg/kg
<b>10</b>	<b>Inputs with halogen containing compounds (exceptions for GOTS sections 4.2.6.6 and 4.2.6.7)</b>	1% AOX
<b>11</b>	<b>Organotin Compounds</b>	
	Dibutyltin (DBT) (Multiple)	20 mg/kg
	Mono, di and tri derivatives of methyltin (Multiple)	5 mg/kg
	Mono, other di and tri derivatives of butyltin (Multiple)	5 mg/kg
	Mono, di and tri derivatives of phenyltin (Multiple)	5 mg/kg
	Mono, di and tri derivatives of octyltin (Multiple)	5 mg/kg
	Monomethyltin compounds (MMT) (Multiple)	5 mg/kg
	Dipropyltin compounds (DPT) (Multiple)	5 mg/kg
	Dibutyltin dichloride (DBTC) (Multiple)	5 mg/kg
	Tripropyltin compounds (TPT) (Multiple)	5mg/kg
	Tetraethyltin compounds (TeET) (Multiple)	5 mg/kg
	Tetrabutyltin compounds (TeBT) (Multiple)	5 mg/kg
	Tetraoctyltin compounds (TeOT) (Multiple)	5 mg/kg
	Tricyclohexyltin (TCyHT) (Multiple)	5 mg/kg
Tricyclohexyltin hydroxide (1321-70-5)	5 mg/kg	

	Bis(tributyltin)trioxide (TBTO) (56-35-9)	5 mg/kg
<b>12</b>	<b>Phthalates</b>	Sum: 250 mg/kg
	Diethylhexyl phthalate (DEHP) (117-81-7)	
	Bis(2-methoxyethyl) phthalate (DMEP) (117-82-8)	
	Di-n-octyl phthalate (DNOP) (117-84-0)	
	Diisodecyl phthalate (DIDP) (26761-40-0)	
	Diisononyl phthalate (DINP) (28553-12-0)	
	Di-n-hexyl phthalate (DnHP) (84-75-3)	
	Dibutyl phthalate (DBP) (84-74-2)	
	Benzylbutyl phthalate (BBP) (85-68-7)	
	Di-n-nonylphthalate (DNP) (84-76-4)	
	Diethyl phthalate (DEP) (84-66-2)	
	Di-n-propyl phthalate (DPrP) (131-16-8)	
	Di-isobutyl phthalate (DIBP) (84-69-5)	
	Di cyclohexylphthalate (DCHP) (84-61-7)	
	Di-iso-octyl phthalate (DIOP)(27554-26-3)	
	Di-C <sub>7-11</sub> branched and linear alkylphthalates (DHNUP) (68515-42-4)	
	Di-C <sub>6-8</sub> branched alkylphthalates (DIHP) (71888-89-6)	
Di-iso-pentyl phthalate (DIPP) (605-50-5)		
Di-n-pentyl phthalate (DnPP) (131-18-0)		
<b>13</b>	<b>PAH</b>	Sum: 200 mg/kg
	Benzo[a]pyrene (BaP) (50-32-8)	20 mg/kg
	Anthracene (120-12-7)	Sum: 200 mg/kg
	Pyrene (129-00-0)	
	Ben-zo[g,h,i]perylene (191-24-2)	
	Benzo(e)pyrene (192-97-2)	
	Indeno[1,2,3-cd]pyrene (193-39-5)	
	Benzo(j)fluoranthene (205-82-3)	
	Benzo[b]fluoranthene (205-99-2)	
	Fluoranthene (206-44-0)	
	Benzo[k]fluoranthene (207-08-9)	
	Acenaphthylene (208-96-8)	
	Chrysene (218-01-9)	
	Dibenz[a,h]anthracene (53-70-3)	
	Benzo[a]anthracene (56-55-3)	
	<u>Acenaphthene (83-32-9)</u>	
	Phenanthrene 85-01-8)	
Fluorene (86-73-7)		
Naphthalene (91-20-3)		
<b>14</b>	<b>Per- and polyfluoroalkyl substances (PFAS)</b>	
	Perfluorooctane sulfonate (PFOS) and related substances	Sum: 2 mg/kg
	Perfluorooctanoic acid (PFOA) and related substances	2 mg/kg
<b>15</b>	<b>Chlorinated Paraffins</b>	
	Short Chain Chlorinated Paraffins (SCCP) (C10 C13)	50 mg/kg

	Medium-Chain Chlorinated Paraffins (MCCPs) (C14-17)	500 mg/kg
<b>16</b>	<b>Glycol Derivatives</b>	
	Bis(2-methoxyethyl)-ether (111-96-6)	50 mg/kg
	2-ethoxyethanol (110-80-5)	50 mg/kg
	2-ethoxyethyl acetate (111-15-9)	50 mg/kg
	Ethylene glycol dimethyl ether (110-71-4)	50 mg/kg
	2-methoxyethanol (109-86-4)	50 mg/kg
	2-methoxyethylacetate (110-49-6)	50 mg/kg
	2-methoxypropylacetate (70657-70-4)	50 mg/kg
	Triethylene glycol dimethyl ether (112-49-2)	50 mg/kg
	2-Methoxy-1-propanol (1589-47-5)	50 mg/kg

**GOTS Section 4.2.2.3**  
**GOTS Section 4.2.2.3 – Endocrine Disruptors**  
 “Endocrine Disruptors”

**SPECIFICATION**

- As a specific requirement, any substance is prohibited:
  - a. If listed in the candidate list in annex 1 of the EU report towards the establishment of a priority list of substances for further evaluation of their role in endocrine disruption in:
    - Category 1: substances for which evidence of endocrine disrupting activity in at least one species using intact animals is available or
    - Category 2: substances for which at least some in vitro evidence of biological activity related to endocrine disruption is available or
  - b. If other scientific evidence is available that identifies the substance as an endocrine disruptor as per the definition provided in GOTS Section 7.
- The EU Commission is currently working on a new concept for the assessment of substances because of their endocrine-disrupting properties, and the EU Joint Research Centre on a corresponding database of substances. As soon as these documents are published, this specification will be reviewed and may be updated accordingly.

**REFERENCES**

- Annex 1 of the EU report towards the establishment of a priority list of substances for further evaluation of their role in endocrine disruption:  
[http://ec.europa.eu/environment/archives/docum/pdf/bkh\\_annex\\_01.pdf](http://ec.europa.eu/environment/archives/docum/pdf/bkh_annex_01.pdf)

**GOTS Section 4.2.2.3 – Inputs releasing arylamines with carcinogenic properties**  
 “Inputs (e.g. azo dyes and pigments) which release arylamines with carcinogenic properties (MAKIII, category 1,2,3) and Aniline, free (category 4)”

**GUIDANCE**

- **Azo dye compounds MAK III, category 1 (with CAS no):**

4-Aminobiphenyl (92-67-1)	2-Naphthylamine (91-59-8)		
Benzidine (92-87-5)	o-Toluidine (95-53-4)		
4-Chloro-o-toluidine (95-69-2)			
<ul style="list-style-type: none"> <li> <b>Azo dye compounds MAK III, category 2 (with CAS no):</b> </li> </ul>			
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-Diaminoanisole (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)			
<ul style="list-style-type: none"> <li> <b>Azo dye compounds MAK III, category 3 (with CAS no):</b> </li> </ul>			
5-Chloro-2-methylaniline (95-79-4)	p-phenylenediamine (106-50-3)		
N,N-Dimethylaniline (121-69-7)			
<ul style="list-style-type: none"> <li> <b>Azo dye compounds MAK III, category 4 (with CAS no):</b> </li> </ul>			
Aniline (62-53-3)			
<ul style="list-style-type: none"> <li> <b>Prohibited azo pigments that may release carcinogenic amine compounds (*or generate the same in a chemical follow-up reaction) include:</b> </li> </ul>			
C.I. Pigment Red 8	C.I. Pigment Red 22	C.I. Pigment Red 23*	C.I. Pigment Red 38

## REFERENCE

- C.I. Numbers as mentioned in [The Colour Index™](#) published online by the Society of Dyers and Colourists and American Association of Textile Chemists and Colourists.

## FURTHER GUIDANCE FOR CARCINOGENIC DYES

Basic Green 4 (Melachite Green)	Basic Green 4 (Melachite Green Oxalate)	Basic Green 4 (Melachite Green Chloride)	C.I. Basic Violet 14
Disperse Orange 11	Disperse Red 151	Disperse Yellow 7	Disperse Yellow 56
Direct Black 38	Direct Blue 6	Basic Violet 3	Disperse Blue 1
C.I. Acid Red 26	C.I. Direct Red 28	C.I. Basic Red 9	C.I. Acid Violet 49

### GOTS Section 4.2.2.3 – Inputs with halogen containing compounds

“Inputs with halogen containing compounds ... Prohibited are inputs that contain > 1% permanent AOX”

## INTERPRETATION

- Inputs with a total content of organic halogens >1% can only be approved if it is plausible that the permanent AOX content is < 1%.
- Chlorine, bromine, iodine shall be taken into consideration for the assessment for the definition of “permanent AOX” refer to Section 7 in GOTS

### GOTS Section 4.2.2.3 - PFAS

“Per- and polyfluoroalkyl substances (PFAS)”

## INTERPRETATION

- Definition: Any substance that contains at least one fully fluorinated methyl (CF<sub>3</sub>-) or methylene (-CF<sub>2</sub>-) carbon atom (without any H/Cl/Br/I attached to it).

## REFERENCES

- [ECHA PFAS Restriction Proposal, p4.](#)

### GOTS Section 4.2.2.3 - MCCPs

“Medium-chain chlorinated paraffins (MCCPs C<sub>14</sub>-C<sub>17</sub>)”

## INTERPRETATION

- Medium Chain Chlorinated Paraffins (MCCPs): UVCB (Substances of Unknown or Variable composition, Complex reaction products or of Biological materials) substances consisting of more than or equal to 80% linear chloroalkanes with carbon chain lengths within the range from C<sub>14</sub> to C<sub>17</sub>.

### GOTS Section 4.2.2.3 – In-can preservatives in chemical inputs

“In-can preservatives in chemical inputs”

## INTERPRETATION

- Use of in-can preservatives is allowed in preparations when the preparation itself satisfies requirements of toxicity.
- In-can preservatives can be declared by the chemical input formulator/trader to their Certification Body during the chemical input approval process.
- If an in-can preservative fails to meet any other requirement of GOTS prior to the input approval, the Certification Body shall notify GOTS for a common decision.
- Exceptionally allowed biocidal active substances are those:
  - a. Listed in the EU BPR Annex I as "approved" or "initial application for approval in progress" in the list for PT06
  - b. Still on the revision list of the Review Programme of EU BPR Annex II part 1. A constant check is recommended on the approved/disapproved list of the Review Programme, as it is subject to change.

### GOTS Section 4.2.2.3 - Quinoline

“Quinoline – Prohibited”

## INTERPRETATION

- Contamination Detection Limit : < 1000 mg/Kg

### GOTS SECTION 4.2.3

“Inputs which are classified with specific hazard statements (risk phrases) related to health hazards”

## INTERPRETATION

- *Preparations* are prohibited if any of the contained *substances*, which are classified with any hazard statement listed in this Section are intentionally added/present as a functional component at any level.
- Further, a *preparation* is prohibited if any of the contained *substances*, which are classified with any hazard statement listed in this Section, is present above the concentration limit, above which the *substance* needs to be declared in the SDS (prepared according to one of the equivalent norms/directives as listed in the interpretation of GOTS Section 4.2.1). *Preparations* that knowingly release such substances at normal application or usage conditions are prohibited.
- In case of doubt about the classifications and applicable concentration limits, the GHS provisions are decisive.
- In case ECHA includes a specific concentration limit for classification, it shall be followed for declaration limit on SDS. Please refer to the recent version of the Adaptation to Technical Progress (ATP) of the Table of harmonised entries in Annex VI to CLP for specific concentration limits.
- *Preparations* are also prohibited if there is validation that their designated use leads to any exceeding residue limits in textiles of the parameters listed in GOTS Section 5.2.7.
- It is possible for a chemical formulator to incorporate a self-classification before the classification is harmonised and legally binding. In such cases, GOTS Scope 4 certifiers shall assess the appointed self-classification for plausibility and include the self-classification as a footnote on the GOTS Letter-of-Approval (LoA).

## REFERENCES

- a. [Globally Harmonized System of Classification and Labelling of Chemicals \(GHS\)](#) as published by the United Nations, 3rd revision 2009 (tables containing hazard statements with H-codes as well as corresponding hazard classes and categories are provided in annex 3)
- b. [Regulation EC 1272/2008](#)
- c. Further relevant Directives for classification and assessment of preparations:
  - o [Directive 2006/8/EC](#)
  - o [Classification & Labelling Inventory for substances registered or notified in the EU](#)
  - o [Table of harmonised entries in Annex VI to CLP](#), Adaptation to Technical Progress (ATP).

### GOTS Section 4.2.3 - Footnotes 8 & 10

“Performing new animal tests to determine LD<sub>50</sub> values in the course of GOTS assessment procedures for inputs is prohibited.”



“Performing new fish and daphnia tests to determine unknown LC<sub>50</sub> / EC<sub>50</sub> values in the course of the GOTS assessment procedure for inputs is prohibited.”

### INTERPRETATION

- In case new animal/fish tests for input would have been carried out in a legally binding registration procedure (such as REACH), it shall be demonstrated that these tests were mandatory, and no alternative method would have been accepted. In other ways and in all other cases of new animal/fish tests performed, the corresponding input shall not be approved for GOTS.

## GOTS SECTION 4.2.4

### GOTS Section 4.2.4.1 and 4.2.4.2

“Chemical Formulators and Chemical subcontractors (if any) shall implement appropriate and effective Product Stewardship practices.”

“An adequate system for product testing and quality assurance shall be in place and verified during an on-site audit.”

### INTERPRETATION

- Product Stewardship practices may include but are not limited to a documented plan defining minimum key tasks for personnel involved and a general flow of the chemical inputs in terms of product development, raw material, process control of various stages of production, control of intermediates, packaging, storage & distribution, marketing and sales, use & end-of-life cycle.
- As a minimum, Chemical Formulators and Chemical Subcontractors shall implement the following quality assurance practices:
  - a. Risk assessment of raw materials and intermediates for consistency and presence of hazardous substances.
  - b. Testing plan for raw materials with defined intervals, test methods and approval criteria.
  - c. Risk assessment of preparations for consistency and presence of unavoidable contaminants.
  - d. Testing plan for formulations and preparations with defined intervals and approval criteria.
  - e. Process control during formulation for consistent quality and hazardous substances.
  - f. Quality assurance practices in formulation of preparations.
  - g. Staff training for risk assessment.
  - h. Adequate evaluation of preparations for the release of hazardous substances during intended use.
  - i. Application of formulations and preparation on textile substrate under controlled conditions set by formulators, verifying conformance with GOTS Section 5.2.7.
- For those chemical formulators or subcontractors which are currently engaged in the bluesign® implementation process, where verifiable results (audit reports) are available, should be screened and considered to the widest extent possible for this section.
- bluesign® criteria conformant chemical formulators or subcontractors should be regarded as adequate to demonstrate compliance with this section. A bluesign® assessment or



implementation progress report shall be provided to the GOTS Certifier to verify full compliance with this section.

### Specific Implementation Deadline for Chemical Subcontractors

- This section shall be implemented by 01 March 2025, and the first inspection shall be completed by 01 July 2025 by a GOTS Approved Certifier (Scope 4).

## GOTS SECTION 4.2.5

### GOTS Section 4.2.5.1 and 4.2.5.2

“Chemical Formulators and Chemical Subcontractors (if any) shall undergo an on-site audit for environmental management system and safety at their production premises.”

“On-site inspection shall be performed as part of the chemical Input assessment for granting and/or renewing a Letter of Approval, which may be valid for up to 3 years or until a new Standard version comes into effect, whichever is earlier.”

### GUIDANCE

- Where verifiable results (audit reports) from the following internationally recognised compliance schemes are available for the inspected Chemical Formulator and Chemical Subcontractor, these audit results should be screened and considered to the widest extent possible for this Section only.
  - a. Eco Passport by Oeko-Tex®
  - b. Certificate of ZDHC Level 3 Product Conformance
  - c. bluesign® (chemical formulators or subcontractors currently engaged in the bluesign® implementation process)
- bluesign® criteria conformant chemical formulators or subcontractors should be regarded as adequate to demonstrate compliance with this section. A bluesign® assessment or implementation progress report shall be provided to the GOTS Certifier to verify full compliance with this section.

### REFERENCES

- a. [Eco Passport by Oeko-Tex®](#)
- b. bluesign®
- c. BluWin

### Specific Implementation Deadline for Chemical Subcontractors

- This section shall be implemented by 01 March 2025, and the first inspection shall be completed by 01 July 2025 by a GOTS Approved Certifier (Scope 4).

### GOTS Section 4.2.5.3

“GOTS criteria in the following sections shall be included in the audit of *chemical formulators* and chemical *subcontractors* (if any) and shall be applicable to the entire *site* during the validity of the certification.”

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## GUIDANCE

(Referring to the requirements set in GOTS Section 4.3.2)

- Wastewater COD values in the case of a *Chemical Formulator* or a *Chemical Subcontractor* shall be below 250 ppm or shall meet legal requirements, whichever is lower.

### GOTS SECTION 4.2.6

#### GOTS Section 4.2.6.2 (b) and (c)

“Any paraffin product used shall be fully refined with a limited value for residual oil of 0.5%.”

“Synthetic fibres which are to be dissolved at a later processing stage, are not allowed to be used.”

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## INTERPRETATION

- Paraffin is directly applied onto fibres/yarns during production therefore, it shall be considered as chemical input.
- Prohibited are synthetic fibres (like polyvinyl alcohol (PVA)) which are used for spinning or an intermediate processing stage and dissolved using water or chemicals at a following processing step.

### GOTS Section 4.2.6.3 - Sizing and Weaving /Knitting

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## GUIDANCE

- Use of PVA (polyvinyl alcohol) as a backing material for embroidery is prohibited

### GOTS Section 4.2.6.5 – Boiling, Kiering, Washing

“Washing detergents shall not contain phosphates.”

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## GUIDANCE

- Analysis of the presence of phosphate cannot be obtained via an analysis of phosphorous using ICP/MS or similar. Analysis of phosphate should be a direct and conclusive test. Knowledge of the formulation of the chemical input or an appropriate test method such as Ion Chromatography adapted from ISO 10304-1 can be considered.

### GOTS Section 4.2.6.6 and 4.2.6.7

“Prohibited – Dyes (disperse) classified as allergenic”.

“Sensitising (H317) chemicals such as disperse dyes shall not be used, handled or manufactured unless proper and sufficient Occupational Health and Safety practices are adhered to ...”

## GUIDANCE

- Following disperse dyes are prohibited for allergenic reasons:

C.I. Disperse Blue 1	C.I. Disperse Orange 1	C.I. Disperse Yellow 1
C.I. Disperse Blue 3	C.I. Disperse Orange 3	C.I. Disperse Yellow 3
C.I. Disperse Blue 7	C.I. Disperse Orange 37	C.I. Disperse Yellow 9
C.I. Disperse Blue 26	C.I. Disperse Orange 76	C.I. Disperse Yellow 23
C.I. Disperse Blue 35	C.I. Disperse Orange 149	C.I. Disperse Yellow 39
C.I. Disperse Blue 102	C.I. Disperse Orange 59	C.I. Disperse Yellow 49
C.I. Disperse Blue 106	C.I. Disperse Red 1	C.I. Disperse Violet 1
C.I. Disperse Blue 124	C.I. Disperse Red 11	
C.I. Disperse Brown 1	C.I. Disperse Red 17	

- A number of disperse dyes on the market are regarded as skin sensitizers (H317), however, they are not allergenic. The use of these dyes is not prohibited as long as Occupational Health and Safety procedures such as safe handling are strictly followed as outlined in respected Safety Data Sheets. The following are some examples of sensitizing disperse dyes (H317):

C.I. Disperse Blue 291	C.I. Disperse Yellow 54	C.I. Disperse Violet 93
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## REFERENCE

- C.I. Numbers as mentioned in [The Colour Index™](#) published online by the Society of Dyers and Colourists and the American Association of Textile Chemists and Colourists.

“The use of natural dyes and auxiliaries that are derived from a threatened species listed on the Red List of the IUCN.”

## REFERENCE

- [Red List of the IUCN](#)

“Prohibited - Colourants classified or suspected as carcinogenic (H350/H351)”

## REFERENCE

- [IARC monographs](#)
- [ECHA Restriction reports](#)
- [Annex VI \(Harmonized Classification\) of the CLP regulation](#)

### GOTS Section 4.2.6.9 (a)

“Machine oils which may come in contact with GOTS Goods during processing/manufacturing stages, along the GOTS supply chain shall be heavy metal-free.”

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## GUIDANCE

- As a common practice, machine oils are utilized for the maintenance of textile machinery and not applied to textiles directly. Therefore, they are not to be perceived as a chemical input for textile processing, however, during textile processing, if used, machine oils may come in contact with textiles. Considering the risk involved, wherever relevant, those machine oils shall be heavy-metal free.

## GOTS Section 4.3

### GOTS Section 4.3.1

“Certified Entities shall establish a written Environmental and Chemical Management Policy that is appropriate to the nature and scale of their business .”

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## INTERPRETATION

- Non-processing Certified Entities (e.g. B2B offices) should address the environmental topics that is appropriate to the nature of their business e.g. GHG emissions caused by their own activities e.g. office lightning as well as emissions released in their supply chain. Such a written environmental policy of non-processing entities shall include emission calculation approaches and also include emission reduction targets, for instance, through sustainable purchasing of office equipments.

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## REFERENCE

- [European Green Office Handbook](#)

### GOTS SECTION 4.3.2

“Certified Entities shall ensure full compliance with all relevant national, regional, and local environmental regulations relevant to their processing activities, including but not limited to air emissions, wastewater and sludge solid waste management, as the base. Certified entities shall document and demonstrate compliance with all applicable permits, including the required parameters and limits by the regulations”

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## INTERPRETATION

- If local legal requirements are stricter than GOTS criteria, local laws shall be followed and vice-versa.
- Certified Entities shall conduct a regular, preferably annual, environmental risk assessment audit aiming to identify potential environmental impacts and risks that are applicable to their processing stages, then accordingly classify and prioritise the identified risks.
- Certified Entities shall set measures to mitigate identified risks and negative impacts.
- Certified Entities shall have a chemical management plan at the site which would also include safe chemical storage, labelling, use of protective equipment for anyone that handles chemicals.
- Certified Entities should identify and use substitutes for chemicals on the MRSL based on scientific data and internationally accepted methodology for assessing hazards. They may also use existing credible substitution lists for any chemicals they need to use for production.

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## FURTHER REFERENCE

- [OECD Environmental Risk Assessment Toolkit](#)

### GOTS Section 4.3.3 (i)

“Assignment of responsibilities: identification of personnel responsible for environmental and chemical management tasks.”

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## INTERPRETATION

- Person(s) responsible for environmental policy and chemical management duties shall be competent, appropriately trained and shall have adequate resources made available to them so as to discharge duties.

### GOTS Section 4.3.7

“Certified Entities shall monitor resource consumption, collect data, and establish meaningful improvement goals”

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## FURTHER GUIDANCE

- [GOTS Monitor Water/ Energy \(GOTS WE Tool\)](#) is a tool specifically developed to support GOTS certified facilities. It covers both requirements, as it determines actual performance and specific consumption values. Furthermore, the tool provides realistic, factory-specific benchmark values that can be used both as improvement targets and milestones to monitor their progress. It is free to use for GOTS certified facilities during the license validity period. Certified entities can download a copy from the GOTS website. The current Version 2.0 was released in November 2018.
- When collecting data on water resources and consumption, it is important to keep a record of the amount of how much fresh water and recycled water is consumed per year at the facility. Certified facilities located in water-stressed areas are required to have water management plans, including the development and implementation of water efficiency plans and/or reducing process dependence on freshwater by re-using and recycling.

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## REFERENCE

- [The OECD Water Governance Programme, Resource Library](#)

### GOTS Section 4.3.8.4:

“Air pollutants include, but are not limited to, the following categories and substances:”

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## GUIDANCE

- For a list of fluorinated greenhouse gases refer to [Regulation \(EU\) No 517/2014](#).

### GOTS Section 4.3.9:

“Certified Entities shall have a documented Greenhouse Gas (GHG) Emission Management Plan that includes identifying GHG emission sources, monitoring, quantifying, and setting measures to reduce emissions. “

## GUIDANCE

- GOTS supports all initiatives that are aimed at arresting and reversing Climate Change, an integral part of the United Nations' Sustainable Development Goals (SDGs). It is incumbent on GOTS Certified Entities to take steps towards meeting these goals, and as a preliminary first step, it is required that Certified Entities identify sources of GHG emissions within their own operations. These may include activities owned or controlled by the enterprise that releases emissions straight to the atmosphere (i.e. direct emissions), or the enterprise's consumption of purchased electricity, heat, steam and cooling (i.e. indirect energy emissions).
- Certified Entities are required to reduce identified GHG emissions to the extent possible over time. They may take a risk-based approach to address their GHG emissions by focusing their resources where GHG emissions are greatest (for example, fossil fuel-based activities). While GOTS currently does not set time or emission limits within its supply chain, it encourages all Certified Entities to evaluate their operations and work towards such goals. A future perspective of Certified Entities should be to extend this evaluation beyond their own operation and also consider GHG emissions released at further levels, such as product related emissions and supply chain emissions.
- Greenhouse Gas Emission Management may be a component/subsection of the written Environmental and Chemical Management Policy of the Certified Entities.

## REFERENCE

- a. Additional information to reduce GHG emissions: OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, Table 13, p.173.
- b. Additional information on GHGs: <https://www.epa.gov/ghgemissions>
- c. Suggested reading: <https://ourworldindata.org/co2-and-other-greenhouse-gas-emissions>

### GOTS SECTION 4.3.2

#### GOTS Sections 4.3.11.6 and 4.3.11.7:

"The applicable local and national legal requirements for wastewater and sludge treatment shall be fulfilled, including limit values for pH, temperature, Total Organic Carbon (TOC), Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD), colour removal, residues of chemical pollutants, and discharge routes."

"Certified Entity shall follow GOTS criteria or the local legal requirements, whichever is more stringent for wastewater and sludge treatment requirements. **Error! Reference source not found.** shall be strictly followed."

## INTERPRETATION

- If the local/national legal requirements are stricter than GOTS criteria, local laws shall be followed and vice-versa.
- Within the GOTS certification procedures, compliance with the national and local legal requirements shall be checked on the basis of the corresponding official environmental permit and through appropriate verification means. In specific, verification shall assure that:
  - a. The quality of discharged wastewater continuously complies with all requirements and limits defined in the environmental permit.
  - b. If the wastewater is (partly) treated in an external plant, the wet processor has a valid delivery contract with the operator of the external treatment plant while

- the contract indicates the parameters and the related limits which shall be respected before discharging the wastewater to the receiving treatment plant.
- the operator of the external plant is legally authorised for this operation and continuously complies with the national and local legal requirements and limits.
- The quantity of wastewater to be treated does not exceed the capacity of the on-site treatment plant and/or the maximum quantity indicated in the delivery contract.
- The indicated quantity to be treated matches the actual processing water quantity used and discharged.

**GOTS Section 4.3.11.3 and 4.3.11.4:**

“Wastewater from processing activities shall be treated through an appropriate internal (on-site, direct discharge) or external (off-site, indirect discharge) Effluent Treatment Plant (ETP) before being discharged into the environment.”

“ETPs shall be effective, operational, and maintained at all the times.”

**INTERPRETATION**

- The question of whether an ETP 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 two-stage treatment plant is requested. Units using auxiliaries that are approved because of their adequate eliminability (e.g. acc. to OECD 302B) shall in addition, have a functioning treatment of the sludge. Maintenance of ETP is especially crucial to eliminate risks such as leakage to the soil and aquifers etc.

**GOTS Section 4.3.11.8:**

“Wastewater analyses and sludge analyses shall be performed periodically at normal operating capacity and the results shall be documented ”

**GUIDANCE**

- Treated wastewater shall include the following test parameters and limits:
  - a. AOX with a limit of 5 mg/l
  - b. *Heavy Metal* residues as per the following table

HEAVY METAL	CAS NO.	LIMIT (Mg/L)
Lead	7439-92-1	100
Mercury	7439-97-6	10
Cadmium	7440-43-9	100
Chromium VI	18540-29-9	50
Total Chromium	7440-47-3	200
Arsenic	7440-38-2	50
Copper	7440-50-8	1000
Nickel	7440-02-0	200
Antimony	7440-36-0	100
Cobalt	7440-48-4	50



Zinc	7440-66-6	5000
Manganese	7439-96-5	5000

### FURTHER GUIDANCE

- Where internal ETPs are used, the latest version of ZDHC (Zero Discharge of Hazardous Chemicals) Wastewater Guidelines should be followed.
- Where external ETPs are fully or partially used, all applicable national and local legal wastewater requirements shall not be lower than GOTS limits for discharged wastewater.

### REFERENCE

- [ZDHC Wastewater Guidelines](#)

#### GOTS Section 4.3.11.10:

“Wastewater discharges to the environment shall not exceed 20 g COD/kg of processed textile (output)”

### INTERPRETATION

- Criteria in this Section relate to compliance requirements for the entire facility.
- The requirement shall be measured downstream of an internal, on-site, wastewater treatment plant and/or an external, off-site, e.g., municipal, wastewater treatment plant receiving wastewater from these wet processing sites.
- The applicable test method for COD determination is ISO 6060.
- The applicable calculation method in this context is as follows:

$$(C \div 1000) \times (V \times 1000) \div (W \times 1000) = \dots \text{ g COD/kg}$$

Where;

C (mg/l) is the COD concentration in water discharged to the environment after treatment

V (m<sup>3</sup>) is the volume of water discharged in the calculation period

W (ton) is the weight of textile output in tonnage in the calculation period

- COD requirements for GOTS are measured in g/kg of processed output. Typical COD test reports contain COD values in g/l of effluent/discharge. Inspectors will need to calculate the COD in g/kg of processed output based on the calculation given above in these cases.

### REFERENCE

- [ISO 6060 Water quality - Determination of the chemical oxygen demand](#)

## GOTS Section 4.4

### GOTS SECTION 4.4.1

#### GOTS Section 4.4.1.3

“The Certified Entity shall respect human rights. The Certified Entity shall avoid causing, contributing, soliciting, encouraging, or supporting human rights abuse through their activities. Further, the Certified Entity shall address any adverse human rights impacts or risks thereof for which they are responsible or with which they are involved.”

## INTERPRETATION

- In all cases, irrespective of the country, specific context and/or nature of Certified Entities' operations, Certified Entities undertake to respect human rights and must respect human rights. Particularly as set out and applied within the GOTS Human Rights and Social Criteria; but Certified Entities must also be aware of and keep in mind the international instruments listed below in order to avoid abusing human rights.
- This includes the overarching, internationally recognised human rights expressed in the International Bill of Human Rights.
- The International Bill of Human Rights consists of:
  - a. the Universal Declaration of Human Rights,
  - b. the International Covenant on Economic, Social and Cultural Rights, and
  - c. the International Covenant on Civil and Political Rights and its two Optional Protocols.
- The Certified Entity shall uphold the United Nations' Guiding Principles on Business and Human Rights.

### References:

- a. [UN General Assembly, Universal Declaration of Human Rights, 10 December 1948](#)
- b. [UN General Assembly, International Covenant on Economic, Social and Cultural Rights, 16 December 1966](#)
- c. [UN General Assembly, International Covenant on Civil and Political Rights, 16 December 1966](#)
- d. [UN General Assembly, International Convention on the Rights of the Child, 20 November 1989, 1577 UNTS 3 \(1990\), Arts. 28\(1\) et seq., 32](#)
- e. [UN Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework \(2011\)](#), including particularly pp. 13-26, see also et seq.

- The Certified Entity shall follow relevant OECD guidance, including the OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

### References:

- a. [OECD \(2011\), OECD Guidelines for Multinational Enterprises, OECD Publishing](#), see particularly pp. 13 et seq.
- b. [OECD\(2018\), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, OECD Publishing, Paris](#)

- The Certified Entity shall respect and comply with the fundamental labour rights formulated by the International Labour Organisation (ILO) and recognised as international minimum standards, as set out in the ILO Declaration on Fundamental Principles and Rights at Work. To ensure proper implementation of GOTS Human Rights and Social Criteria, the corresponding relevant ILO Conventions and Recommendations shall be observed.

### References:

[Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation \(ILO\)](#)

### Forced Labour:

[C029 - Forced Labour Convention, 1930 \(No. 29\)](#)

[C105 - Abolition of Forced Labour Convention, 1957 \(No. 105\)](#)

**Child labour:**

- [C090 - Night Work of Young Persons \(Industry\) Convention \(Revised\), 1948 \(No. 90\)](#)
- [C138 - Minimum Age Convention, 1973 \(No. 138\)](#)
- [C182 - Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#)
- [R190 - Worst Forms of Child Labour Recommendation, 1999 \(No. 190\)](#)

**Discrimination and Harassment:**

- [C100 - Equal Remuneration Convention, 1951 \(No. 100\)](#)
- [C111 - Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#)
- [C190 - Violence and Harassment Convention, 2019 \(No. 190\)](#)

**Gender Equality:**

- [C111 - Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#)
- [C100 - Equal Remuneration Convention, 1951 \(No. 100\)](#)
- [C156 - Workers with Family Responsibilities Convention, 1981 \(No. 156\)](#)
- [C183 - Maternity Protection Convention, 2000 \(No. 183\)](#)

**Freedom of association and the right to collective bargaining are respected:**

- [C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 \(No. 87\)](#)
- [C098 - Right to Organise and Collective Bargaining Convention, 1949 \(No. 98\)](#)
- [C135 - Workers' Representatives Convention, 1971 \(No. 135\)](#)
- [C154 - Collective Bargaining Convention, 1981 \(No. 154\)](#)

**Occupational Health and Safety (OHS):**

- [R097 – Protection of Workers' Health Recommendation, 1953 \(No. 97\)](#)
- [C121 - Employment Injury Benefits Convention, 1964 \(No. 121\)](#)
- [C120 – Hygiene \(Commerce and Offices\) Convention, 1964 \(No. 120\)](#)
- [C148 – Working Environment \(Air Pollution, Noise and Vibration\) Convention, 1977 \(No. 148\)](#)
- [C155 - Occupational Safety and Health Convention, 1981 \(No. 155\)](#)
- [R164 – Occupational Safety and Health Recommendation, 1981 \(No. 164\)](#)
- [C170 – Chemicals Convention, 1990 \(No. 170\)](#)
- [C174 – Prevention of Major Industrial Accidents Convention, 1993 \(No. 174\)](#)
- [R181 – Prevention of Major Industrial Accidents Recommendation, 1993 \(No. 181\)](#)
- [C187 – Promotional Framework for Occupational Safety and Health Convention, 2006. \(No. 187\)](#)
- [R205 – Employment and Decent Work for Peace and Resilience Recommendation, 2017 \(No. 205\)](#)

**Remuneration and Assessment of Living Wage Gap:**

- [C095 - Protection of Wages Convention, 1949 \(No. 95\)](#)
- [C131 - Minimum Wage Fixing Convention, 1970 \(No. 131\)](#)
- [R085 – Protection of Wages Recommendation, 1949 \(No. 85\)](#)

**Working time:**

- [C001 - Hours of Work \(Industry\) Convention, 1919 \(No. 1\)](#)
- [C014 - Weekly Rest \(Industry\) Convention, 1921 \(No. 14\)](#)
- [C030 - Hours of Work \(Commerce and Offices\) Convention, 1930 \(No. 30\)](#)
- [C106 - Weekly Rest \(Commerce and Offices\) Convention, 1957 \(No. 106\)](#)

**No precarious employment is provided:**

- [C158 - Termination of Employment Convention, 1982 \(No. 158\)](#)
- [C175 - Part-Time Work Convention, 1994 \(No. 175\)](#)

[C177 - Home Work Convention, 1996 \(No. 177\)](#)

[C181 - Private Employment Agencies Convention, 1997 \(No. 181\)](#)

**Migrant Workers:**

[C097 - Migration for Employment Convention \(Revised\), 1949 \(No. 97\)](#)

[C143 - Migrant Workers \(Supplementary Provisions\) Convention, 1975 \(No. 143\)](#)

- The conventions and recommendations mentioned above are published on the official [ILO website](#).
- Addressing adverse human rights impacts or risk thereof requires taking adequate measures for their prevention, mitigation and, where appropriate, remediation.
- Certified Entities must address such adverse human rights impacts or risks thereof, even if they have not contributed to them, to the extent that the impacts or risks are directly linked to their operations, products or services by their business relationships.

#### **GOTS Section 4.4.1.4**

“... the Certified Entity shall respect the human rights of individuals belonging to specific groups or populations at risk of particular vulnerability and in relation to whom there is particularised protection, including indigenous peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families.”

#### **INTERPRETATION**

- In this connection, international instruments have elaborated further on the rights of indigenous peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families.

#### **REFERENCES**

**Indigenous peoples:**

[UN Declaration on the Rights of Indigenous People, 2007](#)

[1989 ILO Convention No. 169 concerning Indigenous and Tribal Peoples in Independent Countries, 1650 UNTS 383 \(1991\)](#)

**Women:**

[UN Convention on the Elimination of All Forms of Discrimination Against Women, 1979](#)

**National or ethnic, religious and linguistic minorities:**

[UN Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities, 1992](#)

**Children:**

[Convention on the Rights of the Child, 1989](#)

**Persons with disabilities:**

[Convention on the Rights of Persons with Disabilities, 2007](#)

**Migrant workers and their families:**

[International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, 1990](#)

#### **GOTS SECTION 4.4.2**

“Forced Labour”

## GUIDANCE

- The Certified Entity shall adopt a zero-tolerance policy for forced labour in their own operations and their supply chain.
- The Certified Entity shall implement a management system that prevents the use of any forms of forced labour in line with ILO Conventions No. 29 and No. 105.
- The Certified Entity shall consider risk factors for forced labour in the garment and footwear sector as provided in the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.
- **The freedom of movement shall be respected:** All workers employed by the GOTS Certified Entity shall have the right to leave their employer's premises freely at the end of their standard working day.

## INTERPRETATION

According to the ILO Forced Labour Convention, 1930 (No. 29), forced labour is: “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.”

- **All work or service:** includes all types of work, service and employment, regardless of the industry, sector or occupation within which it is found, and encompasses legal and formal employment as well as illegal and informal employment.
- **Menace of any penalty:** should be understood in a very broad sense: it covers penal sanctions, as well as various forms of coercion, such as threats, physical violence, psychological coercion, retention of identity documents non-payment of wages, or a loss of rights or privileges.
- **Voluntary offer:** refers to the freely given and informed consent of workers to enter into an employment relationship and to their freedom to leave their employment at any time (e.g. with notice of reasonable length).

## REFERENCES

- [C029 - Forced Labour Convention, 1930 \(No. 29\)](#)
- [C105 - Abolition of Forced Labour Convention, 1957 \(No. 105\)](#)
- [ILO, Combating Forced Labour, A handbook for Employer and Businesses](#)
  - **Forced labour** has been defined to encompass all traditional or new forms of work or service where the persons have not offered themselves voluntarily, whether terminology is used, including servitude, bonded, indentured labour and human trafficking for the purpose of forced labour.
  - **Bonded labour:** Debt bondage arises when persons mortgage their services or those of their family members to someone providing credit to repay the loan or advance.
  - **Trafficking in Persons/Human Trafficking:** It involves the movement of a person, often across international borders, for the purpose of exploitation. A basic definition of human trafficking is found in the Palermo Protocol of 2000. Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons by means of the use of threat or force, deception or other forms of coercion for the purpose of exploitation, including forced labour, slavery and servitude.

## REFERENCES

- a. [Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, 2000 \(“Palermo Protocol”\) art 3](#)
- b. [UN Supplementary Convention on the Abolition of Slavery, 1956, art. 1](#)

### GOTS SECTION 4.4.3

“Child Labour”

## GUIDANCE

- The Certified Entity shall not tolerate child labour in its own operations and that of its suppliers. This commitment applies to the whole supply chain.
- The Certified Entity shall implement a management system that prevents the employment of children under the age of 15, prevents the worst forms of child labour, and prevents the exposure of employees under the age of 18 to hazardous work in line with ILO Conventions No. 138 and No. 182.
- The Certified Entity shall make a public commitment to respect internationally recognised human rights, including the right to be free from child labour. The Certified Entity shall include such a commitment in its RBC Policy or adopt a separate policy for these purposes.
- The Certified Entity shall consider risk factors for child labour in the garment and footwear sector as provided in the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.
- Workplace-based child monitoring committees may be an effective method of monitoring child labour.

## REMEDATION

In taking all appropriate measures to remove a child who appears to be below minimum age from the workplace, and in ensuring this child gets appropriate remedy, the Certified Entity is encouraged to monitor that the former child labourer is adequately protected, has not returned to work, or has been placed in a more precarious situation.

- The Certified Entity is encouraged to monitor and actively support the former child labourer's rehabilitation and social integration, including by engaging with credible state, community, family and other initiatives to find solutions and help children transition from work to school.

## INTERPRETATION

“Child labour” is work that deprives children of their childhood, potential, and dignity, and/or which is harmful to the child's health or the child's physical or mental development.

- "Minimum age" is that for admission to employment or work and is not less than the age of completion of compulsory schooling according to the relevant state's domestic system. Such minimum age may be older than, or equal to, but not younger than 15 years of age, although in certain limited cases it may be 14 years of age. These definitions and use as undertaken by states in ratifying C138 - Minimum Age Convention, 1973 (No. 138).

## REFERENCES

- a. [C138 - Minimum Age Convention, 1973 \(No. 138\), Art. 2;](#)
- b. [Ratifications of C138 - Minimum Age Convention, 1973 \(No. 138\);](#)

- c. [1989 Convention on the Rights of the Child, 1577 UNTS 3 \(1990\), Arts. 28\(1\) et seq., 32.](#)
- d. [OECD \(2017\), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, pp. 105-115.](#)
- e. [ILO, Checkpoints for Companies – Eliminating and Preventing Child Labour \(2016\)](#)

### **GOTS Section 4.4.3.3**

“The Certified Entity shall not employ a Young Worker at night or in conditions that are hazardous to their physical and mental health and development ...”

### **INTERPRETATION & GUIDANCE**

- A "Young Worker" is someone older than minimum age, but younger than 18 years of age.
- For the purposes of Subsection 3.3.3, employment in conditions that are hazardous to physical and mental health and development corresponds with work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children as set out in C182 - Worst Forms of Child Labour Convention, 1999 (No. 182), Articles 3(d), 4; and as elaborated in R190 - Worst Forms of Child Labour Recommendation, 1999 (No. 190), Paragraphs 3-4. This can include but is not limited to:
  - a. work which exposes children to physical, psychological or sexual abuse;
  - b. work underground, under water, at dangerous heights or in confined spaces;
  - c. work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads;
  - d. work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health;
  - e. work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer.
- This also includes work determined as such by any national laws or regulations or by the competent authority, after consultation with the organizations of employers and workers concerned, whichever as between the ILO standards and national laws affords greater protection.
- **Age verification, for purposes of minimum age and young workers:** The Certified Entities shall verify the age of their employees, preferably before employment, and should consider the following age verification techniques:
  - a. Medical examinations and documents;
  - b. Written affidavits and documents, especially those which are corroborating/corroborated;
  - c. Birth certificates, where available;
  - d. End of compulsory schooling certificate for applicants and employees who are above minimum age;
  - e. School enrolment certificate for applicants and employees in light work;
  - f. Culturally sensitive interviews with applicants and employees who appear to be too young.
- In assessing the foregoing, the Certified Entity shall keep in mind the degree of reliability of the source(s), including the possibility of falsified documents.

## INTERPRETATION & GUIDANCE

- In certifying and auditing, regard shall be had not only to formal employment contracts and relationships; but also to any informal employment modalities or circumstances similar to employment which may have the effect of or may be conducive to avoiding or defeating the purpose of the child labour criteria. Particularly where the respective rights and obligations of the parties concerned are not clear, or where there has been an attempt to disguise the employment relationship.

## REFERENCES

- a. [C138 - Minimum Age Convention, 1973 \(No. 138\)](#)
- b. [Ratifications of C138 - Minimum Age Convention, 1973 \(No. 138\)](#)
- c. [C182 - Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#)
- d. [R190 - Worst Forms of Child Labour Recommendation, 1999 \(No. 190\)](#)
- e. [1966 International Covenant on Economic, Social and Cultural Rights, 993 UNTS 3 \(1976\), Arts. 10\(3\), 13\(2\)](#)
- f. [1989 Convention on the Rights of the Child, 1577 UNTS 3 \(1990\), Arts. 28\(1\) et seq., 32](#)

### GOTS SECTION 4.4.4

“Discrimination, Harassment and Violence”

## GUIDANCE

- The Certified Entity shall implement a management system to prevent and address all forms of violence and harassment in the workplace labour in its own operations and that of its suppliers.
- Within its Policy on Responsible Business Conduct and/or in a separate policy, the Certified Entity should adopt a workplace policy on discrimination and violence. Such policy should at least include a commitment to fostering an environment at work free from harassment and violence, specify the rights and responsibilities of workers and employers, and information on the complaint and investigation procedure mentioned in sections 4.4.4.3 and 4.4.13.5.
- The Certified Entity shall establish complaints procedures that allow workers to submit complaints in an anonymous and confidential manner. Direct access to confidential and anonymous complaints procedure is particularly relevant in cases of discrimination, violence and harassment.
- The Certified Entity shall consider risk factors for sexual harassment and sexual and gender-based violence as provided in the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.
- In working situations with a predominantly female workforce, Certified Entity shall use female rather than male overseers and managers.
- Certified Entity is encouraged to take preventive measures such as safe transportation, safe facilities and safe surroundings for female & male employees.

## INTERPRETATION

- Violence and harassment are defined by ILO Convention No.190 - Violence and Harassment Convention, 2019 (No. 190) as a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm, and includes gender-based violence and harassment.





- Gender-based violence and harassment are defined as violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes sexual harassment by ILO C190 - Violence and Harassment Convention, 2019 (No. 190).

## REFERENCES

- a. [C100 - Equal Remuneration Convention, 1951 \(No. 100\)](#)
- b. [C111 - Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#)
- c. [C190 - Violence and Harassment Convention, 2019 \(No. 190\)](#)
- d. [R206 - Violence and Harassment Recommendation, 2019 \(No. 206\)](#)
- e. [ILO \(2023\) Manual on Grievance Mechanisms](#)

## GOTS SECTION 4.4.5

“Gender Equality”

### GUIDANCE

The Certified Entity shall embed gender equality into its Policy on Responsible Business Conduct and into its management systems. The Certified Entity's gender equality policy should be explicit about what Certified Entity expects from its employees and management, key suppliers, clients, and other business associates. It should seek to prevent adverse impacts, monitor operational practices, learn from experience, and improve continuously.

The Certified Entity shall generally conform to the provisions of international law and of the relevant ILO conventions and/or national/local laws, whichever affords greater protection.

To comply with these criteria, Certified Entity shall

- Respect the human rights to work; to free choice of profession and employment; and to the same employment opportunities including the application of the same criteria for selection ([1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 \(1981\)](#), Art. 11(1)(a)-(c)).
- Respect the rights to promotion, to job security and to all benefits and conditions of service for men and women workers including receiving vocational training and retraining ([1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 \(1981\)](#), Art. 11(1)(c)).
- Respect the right to, and abide by the principle of, equal remuneration including benefits for men and women workers for work of equal value. *I.e.* rates of remuneration established without discrimination based on sex; but rather based on objective appraisal of, and equality in treatment in the evaluation of, jobs on the basis of the work to be performed and the quality of work. (Per [1966 International Covenant on Economic, Social and Cultural Rights, 993 UNTS 3 \(1976\)](#), Art. 7(a)(i); [1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 \(1981\)](#), Art. 11(1)(d); [C100 - Equal Remuneration Convention, 1951 \(No. 100\)](#), Arts. 1-3).
- To comply with the gender equality criteria, the Certified Entity shall also conform to the following provisions of international law instruments; and/or to further elaboration in national/local laws, whichever of these sources affords greater protection:
  - **Maternity leave and duration:** a woman shall be entitled to a period of maternity leave of not less than 14 weeks. Which may commence before childbirth as a prenatal portion of maternity leave; and of which generally at least 6 weeks must take place after childbirth as a postnatal portion of maternity leave. On the production of a medical certificate, additional leave shall be provided before or after the maternity leave period in the case of illness, complications or risk of complications arising out of pregnancy or childbirth. The nature and the maximum duration of such leave may be

specified in accordance with national law and practice. ([1966 International Covenant on Economic, Social and Cultural Rights, 993 UNTS 3 \(1976\)](#), Art. 10(2); [1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 \(1981\)](#), Art. 11(2)(b); [C183 - Maternity Protection Convention, 2000 \(No. 183\)](#), Art. 4 paras. 1, 4-5, Art. 5.)

- **Maternity leave benefits:** These periods of maternity leave or maternity-related leave shall be fully-paid leave; or leave with cash benefits; or leave with adequate social security benefits or benefits out of social assistance funds or through compulsory social insurance or public funds. Whichever is available and highest, in accordance with national laws and regulations, or in any other manner consistent with a national practice. In any event if fully-paid leave and leave with social security benefits are not available, then cash benefits must be provided and in any event such cash benefits shall be at a level that ensures that the woman can maintain herself and her child in proper conditions of health and with a suitable standard of living. ([1966 International Covenant on Economic, Social and Cultural Rights, 993 UNTS 3 \(1976\)](#), Art. 10(2); [1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 \(1981\)](#), Art. 11(2)(b); [C183 - Maternity Protection Convention, 2000 \(No. 183\)](#), Art. 6.)
- **Employment protection:** An employer may not terminate the employment of a woman except on grounds unrelated to any pregnancy, maternity leave, birth of a child and its consequences including nursing. The burden of proving that the reasons for dismissal are unrelated shall rest on the employer. A woman is guaranteed the right to return to the same position or an equivalent position paid at the same rate at the end of her maternity leave ([1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 \(1981\)](#), Art. 11(2)(a)-(b); [C183 - Maternity Protection Convention, 2000 \(No. 183\)](#), Art. 8 paras. 1-2).
- **Health protection at the workplace:** An employer must ensure that pregnant or breastfeeding women who are working are not obliged to perform work prejudicial to the health and safety of the mother or the child, or where an assessment has established a significant risk to the mother's health and safety or that of her child ([1966 International Covenant on Economic, Social and Cultural Rights, 993 UNTS 3 \(1976\)](#), Art. 7(b); [1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 \(1981\)](#), Art. 11(1)(f), (2)(d); [C183 - Maternity Protection Convention, 2000 \(No. 183\)](#), Art. 3).
- **Breastfeeding arrangements at work:** Women are entitled to one or more daily breaks or a reduction of daily work hours for breastfeeding. Breaks or reductions of work hours shall be counted as working time and remunerated accordingly. The length and number of breaks are to be determined by national law or practice ([C183 - Maternity Protection Convention, 2000 \(No. 183\)](#), Art. 10.)
- Family responsibilities shall not, as such, constitute a valid reason for termination of employment, and marital status shall not, as such, give rise to discrimination in dismissals ([1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 \(1981\)](#), Art. 11(2)(a), (c); [C156 - Workers with Family Responsibilities Convention, 1981 \(No. 156\)](#), Art. 8).

## REFERENCES

- a. [C111 - Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#)
- b. [C100 - Equal Remuneration Convention, 1951 \(No. 100\)](#)
- c. [C183 - Maternity Protection Convention, 2000 \(No. 183\)](#)
- d. [C156 - Workers with Family Responsibilities Convention, 1981 \(No. 156\)](#)
- e. [1966 International Covenant on Economic, Social and Cultural Rights, 993 UNTS 3 \(1976\)](#), Art. 10(2)
- f. [1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 \(1981\)](#), Art. 11

- g. [UN OHCHR, Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework \(2011\), pp. 1, 14](#)
- h. [OECD, OECD Guidelines for Multinational Enterprises \(2011\), pp. 32, 35, 39](#)

#### **GOTS SECTION 4.4.6**

“Freedom of Association and Collective Bargaining”

#### **GUIDANCE**

- The Certified Entity shall establish a clear policy prohibiting anti-worker practices in its own operations and across its supply chain.
- The Certified Entity shall respect employees’ rights to freedom of association, union membership and collective bargaining, for the promotion and protection of employees’ economic and social interests.
- "Collective bargaining" extends to all negotiations which take place between an employer, a group of employers or one or more employers' organisations, on the one hand, and one or more workers' organisations, on the other, for
  - a. determining working conditions and terms of employment; and/or
  - b. regulating relations between employers and workers; and/or
  - c. regulating relations between employers or their organisations and a workers' organisation or workers' organisations.
- The Certified Entity shall participate in dialogue and collective bargaining processes in good faith and not obstruct alternative means of association where there are domestic legal restrictions.
- The Certified Entities shall respect and rely on, including when developing the policies concerning the right to freedom of association and collective bargaining, ILO Conventions 87, 98, 135 and 154.
- The Certified Entity shall consider a description of anti-union policies and practices as provided in the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

#### **REFERENCES**

- a. [C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 \(No. 87\)](#)
- b. [C098 - Right to Organise and Collective Bargaining Convention, 1949 \(No. 98\)](#)
- c. [C135 - Workers' Representatives Convention, 1971 \(No. 135\)](#)
- d. [C154 - Collective Bargaining Convention, 1981 \(No. 154\)](#)
- e. [1966 International Covenant on Economic, Social and Cultural Rights, 993 UNTS 3 \(1976\), Art. 8](#)
- f. [OECD Guidelines for Multinational Enterprises \(2011\), pp. 35-40](#)
- g. [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector \(2018\), pp. 146-151](#)

#### **GOTS SECTION 4.4.7**

##### **GOTS Section 4.4.7.1**

“The Certified Entity shall ensure safe and hygienic working conditions ...”

## GUIDANCE

- The Certified Entity shall take appropriate account of the international best practices and recommendations, when developing the policies regarding Occupational Health and Safety, including but not limited to those set by ILO.
- The Certified Entity shall to the extent possible follow the [ILO Code of Practice on Safety and Health in Textiles, Clothing, Leather and Footwear Industries](#).
- The Certified Entity, if applicable, shall maintain documentary proof concerning the compliance with the domestic legal requirements for the levels of ventilation, lighting, temperature, noise, exposure to dust and cleanness. The Certified Entity shall also maintain all legally required certificates concerning the building safety and maintenance of electrical installations.
- Besides, the Certified Entity shall take appropriate account of the relevant international conventions and recommendations.
- The Certified Entity shall provide for or co-operate in remediation where appropriate.

## REFERENCES

- a. [C121 - Employment Injury Benefits Convention, 1964 \(No. 121\)](#)
- b. [C155 – Occupational Safety and Health Convention, 1981 \(No. 155\), Articles 16-20](#)
- c. [R164 - Occupational Safety and Health Recommendation, 1981 \(No. 164\), Section 4](#)
- d. [C170 - Chemicals Convention, 1990 \(No. 170\), Articles 10-16](#)
- e. [R097 - Protection of Workers' Health Recommendation, 1953 \(No. 97\)](#)
- f. [ILO Guidelines on Occupational Safety and Health Management Systems \(ILO-OHS-2001\)](#)

### GOTS Section 4.4.7.10

“... Workers shall be able to exit the premises in case of imminent danger without seeking permission”

## GUIDANCE

- Certified Entities shall comply with the principles set out in Article 13 of ILO Convention No. 155 and Article 18(1) of ILO Convention No. 170.
- Workers have an unconditional right to evacuate promptly from the workplace if they reasonably believe that there is an imminent and serious danger to their health or safety.
- Certified Entities are required to ensure that emergency protocols are clearly formulated and disseminated to all workers.

## REFERENCES

- a. [C155 – Occupational Safety and Health Convention, 1981 \(No. 155\)](#)
- b. [C170 - Chemicals Convention, 1990 \(No. 170\)](#)

### GOTS Section 4.4.7.10

“The Certified Entity may additionally use pictograms for the safety signs”

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## REFERENCES

- ISO 780, ISO 7010

### GOTS Section 4.4.7.16

“The Certified Entity shall develop and implement emergency response plans to deal with extreme weather events, including but not limited to extreme heat, floods, and storms. These plans shall include procedures for stopping work, evacuating workers to safe areas, and ensuring immediate access to medical care if necessary.”

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## GUIDANCE

- The Certified Entity shall, where appropriate implement preventive measures to reduce the impact of extreme weather, especially heat stress, on workers. This may include adjusting work schedules to avoid periods of extreme heat, providing adequate hydration stations, and establishing shaded or air-conditioned rest areas. Such measures are particularly critical in regions prone to high temperatures or during peak heat seasons and for workers who may be more vulnerable to heat stress, such as young workers or those with certain health conditions.
- The Certified Entity shall reduce exposure through administrative control measures, such as rotating work roles, implementing medical surveillance programmes, recording pollution levels, reporting cases of occupational diseases that may be caused by ambient air pollution.
- The Certified Entity shall inform and train Workers on all such potential occupational hazards and preventive measures.

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## INTERPRETATION

- According to the [ILO Guidelines on Occupational Safety and Health Management Systems](#) (ILO-OSH 2001), preventive and protective measures should be implemented in the following order of priority:
  - (i) eliminate the hazard;
  - (ii) control the risk at source (through the use of engineering controls or organizational measures);
  - (iii) minimize the risk by designing safe work systems (including administrative measures taken for risk control); and
  - (iv) where residual risks cannot be controlled by collective measures, the employer should provide appropriate personal protective equipment (PPE) at no cost and take measures to ensure its use and maintenance.
- **Heat Stress** is the sum of metabolic heat plus environmental heat, minus the heat lost from the body to the environment.
- Extreme heat and high humidity pose significant risks to workers in industries such as **textiles, clothing, and footwear**. These risks include heat stress, heat-related illnesses, and increased injury likelihood.

## REFERENCES

- [UN General Assembly, International Convention on the Rights of the Child, 20 November 1989, 1577 UNTS 3 \(1990\), Arts. 28\(1\) et seq., 32](#)
- [ILO Global Report: Ensuring safety and health at work in a changing climate \(2024\)](#)
- [ILO Code of Practice on Safety and Health in Textiles, Clothing, Leather and Footwear Industries \(2022\)](#)
- [Ambient factors in the workplace code of practice \(ILO 2001\)](#)
- [C148 –Working Environment \(Air Pollution, Noise and Vibration\) Convention, 1977 \(No. 148\)](#)
- [EU-OSHA – Climate Change: Impact on Occupational Safety and Health \(OSH\) \(2023\)](#)
- [EU Directive 2009/104/EC](#)

### GOTS Section 4.4.7.17

“The Certified Entities shall use appropriate tools to monitor environmental conditions such as temperature and humidity in work areas. The Certified Entity shall adjust work schedules, determine the need for personal protective equipment (PPE) and ensure appropriate breaks during extreme weather conditions. These measures shall be reviewed and updated at least annually or more frequently if conditions change significantly.”

## GUIDANCE

- The Certified Entity shall regularly assess both indoor and outdoor work environments to identify and address risks related to extreme weather conditions, particularly heat stress. The assessment should include an evaluation of temperature trends, humidity levels, and potential heat exposure for workers and should involve consultation with workers or their representatives. These assessments should be documented and updated as part of the Certified Entity's overall health and safety management system.
- Certified Entities are encouraged to provide workers with appropriate PPE designed to reduce body heat retention, such as cooling vests or lightweight, breathable clothing. Hydration facilities should be available throughout the workday, ensuring that workers can maintain adequate fluid intake during shifts in high-temperature environments.
- Certified Entities should train workers and supervisors to recognise the early signs of heat stress, including dehydration, fatigue, and dizziness. Training programmes should cover appropriate responses to these symptoms and the importance of regular hydration. Supervisors should be trained to take immediate action if heat stress symptoms are observed.
- Certified Entities shall maintain records of all weather-related incidents and implement preventive measures. These records should be used to inform ongoing improvements to weather-related risk management strategies.
- Certified Entities shall monitor conditions and have first-aid facilities ready to manage heat-related emergencies.
- Certified Entities are encouraged to adopt and regularly review long-term strategies to mitigate risks associated with extreme weather conditions, particularly heat stress. This may include infrastructural improvements, technological solutions for cooling, or changes in production processes to reduce heat generation.

## INTERPRETATION & GUIDANCE

For example, regarding heat stress, to establish a climate mitigation plan, Certified Entities shall:

Assess hazards and implement control strategies such as heat plans to address climate-related risks as part of their Workplace Risk management. These measures include:

- (i) technical measures (e.g., cooling systems),
- (ii) organisational measures (e.g., adjusted work schedules), and
- (iii) individual measures (e.g., smart PPE for heat stress monitoring).

## REFERENCES

- [ILO Global Report: Ensuring safety and health at work in a changing climate \(2024\)](#)
- [ILO Code of Practice on Safety and Health in Textiles, Clothing, Leather and Footwear Industries \(2022\)](#)
- [ILO Guidelines on Decent Work in Public Emergency Services \(2018\)](#)
- [R205 – Employment and Decent Work for Peace and Resilience Recommendation, 2017 \(No. 205\)](#)
- [Guidelines on Occupational Safety and Health Management Systems \(ILO-OSH 2001\)](#)
- [ILO Ambient Factors in the Workplace Code of Practice \(2001\)](#)
- [C174 – Prevention of Major Industrial Accidents Convention, 1993 \(No. 174\)](#)
- [R181 – Prevention of Major Industrial Accidents Recommendation, 1993 \(No. 181\)](#)
- [R164 – Occupational Health and Safety, Recommendation 1981 \(No.164\)](#)
- [C148 –Working Environment \(Air Pollution, Noise and Vibration\) Convention, 1977 \(No. 148\)](#)
- [C120 – Hygiene \(Commerce and Offices\) Convention, 1964 \(No. 120\),](#)
- [EU-OSHA – Climate Change: Impact on Occupational Safety and Health \(OSH\) \(2023\)](#)
- [\(EU\) Council Directive 89/654/EEC](#)

## GOTS SECTION 4.4.8

### GOTS Section 4.4.8.2

“Wages and benefits paid for regular working hours meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and provide some discretionary income.”

## GUIDANCE

- The Certified Entity shall establish a clear policy ensuring that remuneration is paid in accordance with applicable laws and international standards on wages for all workers in its own operations and across its supply chain.
- No worker may experience a decrease in real wages year over year. Adjust each worker’s wage at least annually. When adjusting workers’ wages the inflation rates shall be taken into account.
- Wage increases shall be transferred to workers through whatever means (e.g., digital electronic payment, cash) is typically used for that worker’s remuneration. Wage

increases will only be paid through in-kind transfers (e.g., food) if negotiated in a collective bargaining agreement.

- If wages are below the relevant living wage benchmark, entities shall regularly increase wages to reduce the gap with the living wage.
- Use country data on inflation (Headline consumer price inflation, annual) published by the World Bank.

## REFERENCES

- [A Global Database of Inflation, World Bank](#)

### GOTS Section 4.4.8.9

“The Certified Entity shall calculate ‘Living Wages’ for their respective operations. Furthermore, the Certified Entity shall compare Living Wages data with their remuneration data and calculate the ‘Wage Gap’ for its workers.”

## GUIDANCE

- Collect detailed data on current compensation. Analyse data to identify distinct wage groups and their earnings. Use the IDH Salary Matrix.
- Identify the local living wage estimate. If available, use the Anker estimate. Otherwise, use the Asia Floor Wage, or other NGO or union estimate. If none of these is available, generate an estimate using the resources provided.
- For each wage group, calculate the wage gap (the difference between actual and living wage).
- Systematically share wage gap calculation with workers, ask them how the living wage estimate compares to their experiences, and record their responses.
- Note that in the future, Living Wage estimates may be required to include the cost of early childcare.
- Systematically share wage gap calculation with buyers, ask them how long it would take to increase prices to cover the wage gap, and record their responses.

## REFERENCES

- [Living Wage Resource Library of Global Living Wage Coalition](#)
- [“Implementing Living Wages – Practical Approach for Business”](#) by the Partnership for Sustainable Textiles, Germany

## FURTHER GUIDANCE

- The Certified Entity shall collect and analyse data about workers’ remuneration and report what the lowest-paid worker is earning and the average earning for each group (e.g., level) of workers.
- Living Wages as estimated by Global Living Wage Coalition shall be used as a definition benchmark. Where such benchmarks are unavailable, or in addition to these benchmarks, Template 5: Fair Remuneration Quick Scan as available from amfori BSCI should be used.
- This template should be read/used with the Section of the amfori BSCI System Manual on Fair Remuneration (especially the auditing interpretation guidelines part III and guidelines for producers part IV) and Annex 9 on How to promote Fair Remuneration.





- Certified Entities based in the European Union may also refer to the study “[Cost of Living, Living Wages, and Minimum Wages in EU-27 countries](#)” conducted by the Central European Labour Studies Institute (CELSI) and WageIndicator Foundation.
- The Certified Entities are encouraged to work toward closing the Wage Gap, which may be required, over time, in the future.

#### REFERENCE

- [Template 5: Fair Remuneration Quick Scan](#)

#### GOTS Section 4.4.8.10

“The Certified Entity shall develop a plan to cover the Wage Gap and pay the Living Wage to its workers.”

#### GUIDANCE

- Systematically share wage gap calculation with buyers, ask them how long it would take to increase prices to cover the wage gap and record their responses.
- Make a plan (signed by the person(s) authorized to implement the plan).
- Plan should include an annual obligation to reduce the gap until its complete elimination.
- Plan should take into account that living wages are subject to change due to inflation, taxation and statutory deductions.
- Ensure that the plan is based on dialogue with a recognized trade union or, in their absence, elected worker representatives.
- Involve buyers that source more than 20% of volume so that you may discuss how they will enable wage improvement.

#### GOTS SECTION 4.4.9

“Working Time”

#### GUIDANCE

- The ILO international framework set up the minimum standards related to working hours for industrial production to be respected by the Certified Entity in any event. Working hours can also be regulated by national laws, collective bargaining agreements or benchmark industry standards.
- The principles on working hours listed in sub-sections 4.4.9.2 and 4.4.9.3 are based on the ILO international framework and are the minimum standard to be respected in all cases by the Certified Entity even if national laws, collective bargaining agreements or benchmark industry standards are less protective for the workers. On the other hand, if national laws, collective bargaining agreements or benchmark industry standards are more protective for the workers than the ILO minimum standards, the Certified entity shall apply the set of rules that is most favourable for the workers in terms of working hours, periods of daily or weekly rest and overtime.
- The Certified Entity shall consider factors that may drive excessive working hours at manufacturing as provided in the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

- The term “Working hours” means the time during which the persons employed are at the disposal of the Certified Entity; it does not include rest periods during which the persons employed are not at the disposal of the Certified Entity. The principle set up in this sub-section relates to normal hours of work understood as the number of hours that may legally be worked during the day or the week excluding overtime.
- The weekly period of rest, shall, wherever possible, (1) be granted simultaneously to all the persons concerned in the certified entity; (2) coincide with the day of the week established as a day of rest by the traditions or customs of the country or district; (3) respect as far as possible the traditions and customs of religious minorities.
- Overtime means hours worked in excess of normal hours of work.
- Voluntary means that overtime may not be forced, should not be subject to employer’s arbitrariness and needs to be in compliance with national laws. Overtime requirements as enumerated within an employment contract should be considered to be voluntary if it is permitted by and in accordance with national legislation or collectively bargained agreements.

- For part-time employees (employed persons whose normal hours of work are fewer than those of comparable full-time workers), the restriction of maximum 12 hours per week of overtime is not to be considered, so long as the total number of hours worked in the week is not more than the total (regular + overtime) allowed for full-time employees.

#### REFERENCE

- a. [C001 - Hours of Work \(Industry\) Convention, 1919 \(No. 1\)](#)
- b. [C014 - Weekly Rest \(Industry\) Convention, 1921 \(No. 14\)](#)
- c. [C030 - Hours of Work \(Commerce and Offices\) Convention, 1930 \(No. 30\)](#)
- d. [C106 - Weekly Rest \(Commerce and Offices\) Convention, 1957 \(No. 106\)](#)
- e. [C175 - Part-Time Work Convention, 1994 \(No. 175\)](#)

#### GOTS SECTION 4.4.10

“No Precarious Employment is Provided”

#### GUIDANCE

- The Certified Entity shall ensure that employment relationships do not cause insecurity and social or economic vulnerability for workers. i.e. ensure protection arising from employment relationships and prevent the avoidance of such protection by way or reason of informal employment.
- The Certified Entity shall, insofar as possible, have written employment agreements expressly setting out the rights and obligations of employees under labour or social security laws and regulations. The work shall be performed based on recognised employment relationships, implicating rights and obligations of employees under labour or social security laws and regulations.

#### REFERENCE

- [R198 - Employment Relationship Recommendation, 2006 \(No. 198\), paras. 1, 9–13; OECD, Guidelines for Multinational Enterprises \(2011\), pp. 37-38 paras. 49-50](#)

## GOTS SECTION 4.4.11

“Migrant Workers”

### GUIDANCE & INTERPRETATION

- According to ILO Migration for Employment Convention (Revised), 1949 (No. 97) and Migrant Workers (Supplementary Provisions) Convention, 1975 (No. 143), migrant worker is defined as: “a person who migrates or who has migrated from one country to another with a view to being employed otherwise than on his own account and includes any person regularly admitted as a migrant worker.”

### REFERENCES

- a. [C097 - Migration for Employment Convention \(Revised\), 1949 \(No. 97\)](#)
- b. [C143 - Migrant Workers \(Supplementary Provisions\) Convention, 1975 \(No. 143\)](#)
- c. [UN, International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families, 18 December 1990](#)

## GOTS SECTION 4.4.12

“Homeworkers”

### GUIDANCE

- The term homework means work carried out by a person, to be referred to as a homeworker
  - a. in his or her home or in other premises of his or her choice, other than the workplace of the employer;
  - b. for remuneration; and
  - c. which results in a product or service as specified by the employer, irrespective of who provides the equipment, materials or other inputs used, unless this person has the degree of autonomy and of economic independence necessary to be considered an independent worker under national laws or regulations.
- Persons with employee status do not become homeworkers simply by occasionally performing their work as employees at home, rather than at their usual workplaces.
- For homeworkers, data on the nature, extent and characteristics of homework shall be compiled by the Certified Entity and made available to Approved Certifiers.
- Appropriate access to private homeworking premises shall be arranged by employers for the purposes of inspection and audit.

### INTERPRETATION

- According to ILO Migration for Employment Convention (Revised), 1949 (No. 97) and Migrant Workers (Supplementary Provisions) Convention, 1975 (No. 143), migrant worker is defined as: “a person who migrates or who has migrated from one country to another with a view to being employed otherwise than on his own account and includes any person regularly admitted as a migrant worker.”

### REFERENCES

- a. [C177 - Home Work Convention, 1996 \(No. 177\), Arts. 1, 4](#)
- b. [OECD, Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector \(2018\), pp. 184-188](#)

## GOTS SECTION 4.4.13

### GOTS SECTION 4.4.13.5

“The Certified Entity shall establish a functional and effective complaint mechanism in relation to GOTS Human Rights and Social Criteria.”

#### GUIDANCE

- The complaints mechanism shall be based on the Guiding Principle 31 of the UNGPs and shall be legitimate, accessible, predictable, equitable, transparent, rights-compatible, and should serve as a source of continuous learning.
- Complainants shall have the right to remain anonymous, with their identity being protected throughout the complaint process.

#### REFERENCES

- [UN, 2011. Guiding principles on business and human rights: implementing the United Nations "Protect, Respect and Remedy" framework](#)
- [ILO \(2023\) Manual on Grievance Mechanisms](#)

#### FURTHER GUIDANCE

- The use of social criteria tools such as SAI's Social Fingerprint programme to help companies measure and improve social performance in their company and their supply chain is encouraged by GOTS.

#### REFERENCES

- SAI's [Social Fingerprint®](#)

## GOTS Section 4.5

### GOTS SECTION 4.5.3

“Assure adherence to relevant OECD guidelines”

#### INTERPRETATION

- OECD "[Good Practice Guidance on Internal Controls, Ethics and Compliance](#)" shall be the reference document.

## GOTS SECTION 5

### GOTS Section 5.1

#### GOTS SECTION 5.1.1

“Certified Entities shall have a “Product Quality Manual” document as part of their Quality Management System (QMS). This document shall outline objectives, performance indicators, testing protocols for materials (e.g. semi or final products, accessories) covered under the GOTS certification.”

## GUIDANCE

- A Quality Management System (QMS) is a structured framework of policies, processes, and procedures designed to ensure that an organisation consistently delivers products or services that meet customer and regulatory requirements. It promotes efficiency, enhances customer satisfaction, and drives continuous improvement.
- Following items can be considered as key components of a QMS:
  - Quality Policy: A formal statement of the organization's commitment to quality.
  - Objectives: Measurable goals for achieving quality outcomes.
  - Processes and Procedures: Defined workflows to ensure consistency and compliance.
  - Roles and Responsibilities: Clear designation of accountability within the organization.
  - Document Control: Management of records to ensure accuracy and accessibility.
  - Performance Monitoring: Regular evaluation of processes through audits, feedback, and key performance indicators (KPIs).
  - Continuous Improvement: Mechanisms for identifying and addressing inefficiencies or areas for enhancement.
- QMS shall have a complaint management system, internal audit mechanism, documenting and monitoring of incidences, risk assessment for contamination, corrective actions, and periodic review of QMS by the management.

## REFERENCES

- ISO 9001: A globally recognised standard for implementing and maintaining an effective QMS.
- Six Sigma: Focuses on reducing defects and improving quality.
- Total Quality Management (TQM)

## GOTS Section 5.2

“Quality Testing Parameters”

## GUIDANCE

- Following factors should be considered, where applicable and relevant, to a risk assessment analysis for quality testing:
  - a. Type of organic fibres used: pesticides and potential Genetically Modified (GM) varieties are commonly used if the same type of fibre would have been sourced conventional.
  - b. Type of additional conventional fibres, accessories and inputs used: pesticides and potential GM varieties commonly used for the corresponding crop; prohibited additives commonly used for regenerated and synthetic fibres as well as accessories
  - c. (Organic) natural fibre claims: non-natural substitutes used (e.g. natural bamboo fibre: rayon made from bamboo; linen and hemp: synthetic imitation fibres)
  - d. 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
  - e. Separation measures in processing: sources of potential contamination from the parallel conventional processing stages performed in the unit
  - f. Transport and storage conditions of GOTS goods: prohibited substances commonly used in transport and storage of comparable conventional products

• **Qualitative GMO screening of cotton in the GOTS supply chain:**

- The protocols outlined in ISO 5354 -1 and ISO 5354-23 shall be followed for qualitative GMO screening of cotton.
- These protocols establishes that GMO screening is possible only on unprocessed (raw/greige) cotton.
- Consequently, GMO testing on chemically processed cotton shall not be considered as valid verification under GOTS.
- Tests shall be performed by qualified testing laboratories which are accredited as per ISO 17025.
- Notwithstanding the above, GOTS recognises that qualitative and quantitative testing techniques evolve and improve over time. Any alternative GMO screening techniques on processed or unprocessed organic cotton, other than what explicitly stated by GOTS, can only be employed following technically supported external verification and subsequent approval by GOTS.
- Testing if an enzyme in a textile auxiliary is derived from GM bacteria to date is still hardly possible for independent labs. Certifiers need to rely on other verification and inspection tools such as the GM declaration of the supplier of the enzyme (such declarations are, e.g. also, the requirement for enzymes used in the organic food supply chain under EC 834/2007) or traceability checks of ingredients / raw materials used to determine if the declared enzyme indeed is used for the applied auxiliary.

• **Suggested Testing Parameters & Matrices**

- a. Certified Entities and Approved Certifiers shall plan their own regime of textile quality testing based on their risk assessment with the overall responsibility of ensuring approved inputs, certified GOTS Goods, and accessories will meet the necessary requirements of the latest GOTS version.
- b. Risk Assessment of chemical inputs can be tricky depending on the chemistry used for different process stages, however, experience and competence in processing should be factors to be considered in deciding on a testing protocol.
- c. Based on chemistry and industry practices, the following are guidance risk parameters for different categories of chemical inputs:

PRE-TREATMENT CHEMICALS	DYES & PIGMENTS	FINISHING CHEMICALS
Chlorophenols	Banned Amines	Formaldehyde
Heavy Metals	Pentachlorophenol	Glyoxal
Organotins	Heavy Metals	Heavy Metals
APEOs	Phthalates (especially printing systems)	Chlorinated Phenols
Fungicides	APEOs	APEOs
GM Starch	Fungicides	Fungicides
	AOX	

- d. It should be abundantly clear that testing of GOTS Goods (for residues) and GOTS approved inputs are squarely within the responsibility and ambit of Certified Entities and Approved Certifiers, based on their specific assessment of risk in each case. However, purely for guidance, test parameter matrices are suggested below
- e. Suggested test parameter matrix for GOTS Chemical Inputs:

3 ISO/DIS 5354-1.2 : Molecular biomarkers — Detection of DNA in cotton used for textile production — Part 1: Extraction of DNA from cotton seed and raw materials derived therefrom. ISO/TS 5354-2 : Molecular biomarkers — Detection of DNA in cotton used for textile production — Part 2: Overview of target sequences for use in polymerase chain reaction (PCR)-based detection methods for cotton genetically modified (GM) event. ISO further states that "ISO/DIS 5354-1.2, along with ISO 5354-2, cancels and replaces IWA 32:2019, which has been technically revised throughout.

PARAMETER	DYES	PIGMENTS	PRINTING INKS	PRINTING AUXILIARIES	DYEING AUXILIARIES	PRE-TREATMENT & FINISHING AUXILIARIES
AOX	*	*	*			
AP/APEO	*	*	*	*	*	*
Heavy Metals	*	*	*	*	*	*
Formaldehyde			*	*	*	
Banned Amines	*	*	*			
Chlorophenols	*	*				
Phthalates				*		
PVC			*			

f. Suggested test parameter matrix for GOTS Goods, residues & quality

PARAMETER	GREY FABRIC	PRINTED FABRIC	DYED FABRIC	PROCESSED / UNDYED FABRIC	METALLIC ACCESSORIES	OTHER ACCESSORIES	SEWING THREAD
Allergenic Disperse Dyes (PES)							*
AOX	*	*	*	*			*
AP/APEO	*	*	*			*	*
Lead / Cadmium	*	*	*	*	*	*	*
Extractable HM	*	*	*	*	*	*	
Nickel Release					*		
Formaldehyde	*	*	*	*			
Banned Amines		*	*			*	*
Chlorophenols	*			*			
Phthalates		*	*			*	
pH value		*	*	*		*	
Colourfastness & Shrinkage		*	*	*		*	*

**GOTS SECTION 5.2.6**

“Any final consumer product, labelled according to GOTS shall comply with the following technical quality parameters.”

## INTERPRETATION

- The following table provides 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:

PARAMETER	MAIN TEST METHOD	ALTERNATE ACCEPTABLE TEST METHODS
Rubbing fastness	ISO 105 X12	AATCC 8, DIN 54021, JIS L0849
Perspiration fastness, alkaline and acidic	ISO 105 E04	AATCC 15, DIN 54020, JIS L0848
Light fastness	ISO 105 B02	AATCC 16 option 3, DIN 54004, JIS L0843
Dimensional change	ISO 6330	AATCC 135 (fabrics) and 150 (garments), DIN 53920, JIS L1018
Saliva Fastness	BVL B 82.92.3	DIN 53160-1
Washing fastness when washed at 40 °C	ISO 105 C06 A1M	AATCC 61 option 3A (at 140 °F), DIN EN 20105-C03, JIS L0844

## FURTHER GUIDANCE

- Wherever possible, GOTS Goods should support decreasing environmental impacts at the use phase. Therefore,
  - GOTS Goods care labels, wherever applicable, shall carry environmentally friendly washing instructions, such as wash at room temperature, use of liquid detergent, no use of bleach, line or flat dry, low or no iron, no dry cleaning, etc.
  - It is recommended that sellers of GOTS Goods inform end-users about end-of-life options.

## GOTS SECTIONS 5.2.7 AND 5.2.8

“Limit Values for residues in GOTS Goods”

“Limit Values for residues in Additional Fibres and Accessories”

## INTERPRETATION

- When conducting residue tests on finished GOTS Goods according to GOTS Section 5.2.7, sampling shall not contain accessory parts (e.g. button placket textiles, lining). Necessary instructions should be provided to testing laboratories. Similarly, additional fibres shall not compromise the pesticide limits in table 5.2.7 after blending with organic fibres.
- In order to demonstrate compliance of (semi/finished) products with the test parameters in GOTS Section 5.2.8 only;
  - Standard 100 by Oeko-Tex®, Class 1 certificates or an equivalent, are considered adequate proof for additional fibres or accessories used in textiles for babies and textile personal care products.
  - Standard 100 by Oeko-Tex®, Class 2 certificates or an equivalent, are considered adequate proof for additional fibres or accessories used for all other GOTS Goods.

## REFERENCE

- [STANDARD 100 by OEKO-TEX®](#)



## GOTS Section 5.2.7.2 and 5.2.8.1

### “Pesticides”

#### INTERPRETATION

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

NAME OF PESTICIDE	CAS NO	APPLICABLE FOR TESTING IN	
		VEGETABLE FIBRES	ANIMAL FIBRES
2,3,5,6-Tetrachlorophenol	935-95-5	✳	
2,4,6-Trichlorophenol	88-06-2	✳	
2,4,5-Trichlorophenoxyacetic acid (2,4,5-T)	93-76-5	✳	
2,4-Dichlorophenoxyacetic acid (2,4-D)	94-75-7	✳	
Acetameprid	135410-20-7	✳	
Aldrin	309-00-2	✳	✳
Atrazine	1912-24-9	✳	
Azinphos	2642-71-9	✳	
Azinphos-methyl	86-50-0	✳	
Alpha- and beta-Endosulfan	959-98-8 33213-65-9	✳	✳
Bifenthrin	82657-04-3	✳	
Bendiocarb	22781-23-3	✳	
Bioresmethrin	28434-01-7		✳
Bromophos-ethyl	4824-78-6	✳	✳
Buprofezin	69327-76-0	✳	
Captafol	2425-06-1	✳	
Carbaryl	63-25-2	✳	✳
Carbosulfan	55285-14-8	✳	
Clethodim	99129-21-2	✳	
Chlordane	57-74-9		✳
Chlordimeform	6164-98-3	✳	
Chlorpyrifos-ethyl	2921-88-2	✳	✳
Chlorpyrifos-methyl	5598-13-0	✳	✳
Chlorfenapyr	122453-73-0	✳	
Chlorfenvinphos	470-90-6	✳	✳
Chlorfluazuron	71422-67-8	✳	
Coumaphos	56-72-4	✳	✳
Cyfluthrin	68359-37-5	✳	✳

<b>Cyhalothrin</b>	91465-08-6	✱	✱
<b>Cyclanilide</b>	113136-77-9	✱	
<b>Cypermethrin</b>	52315-07-8	✱	✱
<b>DDD (op- and pp-)</b>	53-19-0, 72-54-8	✱	✱
<b>DDE (op- and pp-)</b>	3424-82-6, 72-55-9	✱	✱
<b>DDT, o,p-</b>	789-02-6	✱	✱
<b>DDT, p,p-</b>	50-29-3	✱	✱
<b>DEF/ 2,4 Dichlorodiphenyldichloroethane</b>	78-48-8	✱	
<b>Deltamethrin</b>	52918-63-5	✱	✱
<b>Diafenthiuron</b>	80060-09-9	✱	
<b>Diazinon</b>	333-41-5	✱	✱
<b>Dichlofenthion</b>	97-17-6		✱
<b>Dichlorprop</b>	120-36-2	✱	
<b>Dichlorvos</b>	62-73-7	✱	✱
<b>Dicrotophos I</b>	141-66-2	✱	
<b>Dieldrin</b>	60-57-1	✱	✱
<b>Diflubenzuron</b>	35367-38-5		✱
<b>Dimethoate</b>	60-51-5	✱	✱
<b>Dinoseb and salts</b>	88-85-7	✱	
<b>Diuron</b>	330-54-1	✱	
<b>Empenthrin</b>	54406-48-3		✱
<b>Endosulfansulfate</b>	1031-07-8	✱	✱
<b>Endrin</b>	72-20-8	✱	✱
<b>Esfenvalerate</b>	66230-04-4	✱	✱
<b>Ethion</b>	563-12-2	✱	✱
<b>Fenclorphos</b>	299-84-3	✱	✱
<b>Fenitrothion</b>	122-14-5	✱	✱
<b>Fenthion</b>	55-38-9		✱
<b>Fenpropathrin</b>	39515-41-8	✱	
<b>Fenvalerate</b>	51630-58-1	✱	✱
<b>Fipronil</b>	120068-37-3	✱	
<b>Flumethrin</b>	69770-45-2		✱
<b>Glyphosate</b>	1071-83-6	✱	
<b>Heptachlor</b>	76-44-8		✱
<b>Heptachlor epoxide</b>	1024-57-3		✱
<b>Hexachlorobenzen (HCB)</b>	118-74-1		✱
<b>Hexachlorocyclohexane - a-Lindane</b>	319-84-6		✱

<b>Hexachlorocyclohexane - b-Lindane</b>	319-85-7		✘
<b>Hexachlorocyclohexane - d-Lindane</b>	319-86-8		✘
<b>Imidacloprid</b>	138261-41-3	✘	
<b>Lindane</b>	58-89-9	✘	✘
<b>Lufenuron</b>	103055-07-8	✘	
<b>Malathion</b>	121-75-5	✘	✘
<b>MCPA</b>	94-74-6	✘	
<b>MCPB</b>	94-81-5	✘	
<b>Mecoprop</b>	93-65-2	✘	
<b>Metolachlor</b>	51218-45-2	✘	
<b>Methomyl</b>	16752-77-5	✘	
<b>Mevinphos</b>	7786-34-7	✘	
<b>Methamidophos</b>	10265-92-6	✘	
<b>Methoxychlor</b>	72-43-5	✘	✘
<b>Mirex</b>	2385-85-5	✘	
<b>Monocrotophos</b>	6923-22-4	✘	
<b>Parathion-ethyl</b>	56-38-2	✘	✘
<b>Parathion-methyl</b>	298-00-0	✘	✘
<b>Pendimethalin</b>	40487-42-1	✘	
<b>PCP/ Pentachlorophenol</b>	87-86-5	✘	✘
<b>Permethrin</b>	52645-53-1	✘	✘
<b>Perthane</b>	72-56-0	✘	
<b>Phosmet</b>	732-11-6	✘	
<b>Phoxim / Baythion</b>	14816-18-3	✘	
<b>Pirimiphos-ethyl</b>	23505-41-1	✘	✘
<b>Pirimiphos-methyl</b>	29232-93-7		✘
<b>Profenophos</b>	41198-08-7	✘	
<b>Prometryn</b>	7287-19-6	✘	
<b>Pymetrozine</b>	123312-89-0	✘	
<b>Propetamphos</b>	31218-83-4		✘
<b>Pyrethrum</b>	8003-34-7	✘	✘
<b>Quinalphos</b>	13593-03-8		✘
<b>Quintozine</b>	82-68-8	✘	
<b>Teflubenzuron</b>	83121-18-0	✘	
<b>Thiamethoxam</b>	153719-23-4	✘	
<b>Tetrachlorvinphos</b>	22350-76-1		✘
<b>Toxaphene</b>	8001-35-2	✘	
<b>Telodrin</b>	297-78-9	✘	

<b>Strobane</b>	8001-50-1	✱
<b>Transfluthrin</b>	118712-89-3	✱
<b>Trifluralin</b>	1582-09-8	✱
<b>Triflumuron</b>	64628-44-0	✱
<b>Thiodicarb</b>	59669-26-0	✱
<b>Thidiazuron</b>	51707-55-2	✱
<b>Tolclofos-methyl</b>	57018-04-9	✱
<b>Trifloxysulfuron-sodium</b>	199119-58-9	✱

## GOTS Section 5.3

“Circularity Principles of GOTS Goods”

### GUIDANCE

- On 4 December 2023 the European Commission reached a provisional agreement on a compromise text for a Regulation on Ecodesign for Sustainable Products (ESPR)<sup>(1)</sup>. The ESPR delivers on the commitments made in both the European Green Deal<sup>(2)</sup> and the Circular Economy Action Plan<sup>(3)</sup>. The ESPR proposes to extend the Ecodesign Directive to cover other specific product groups including textile products to improve product circularity, energy performance and other environmental sustainability aspects. Ecodesign requirements concerns the environmental performance of the products as well as the information that must accompany the product. A Digital Product Passport (DPP) will be required by the EU to hold and convey the necessary information, and traceability features.
- GOTS lays out a forward-looking set of actions, to set the basis for the future development of the ecodesign requirements for GOTS Goods within the framework of the ESPR and ensures that future revision of the GOTS criteria for textile products evolves in parallel with the framework.
- Decision makers of a final product design, in most cases, the buyers of the final products (e.g. brands, retailers, importers, traders) shall establish an ecodesign plan for the GOTS product that they place order for production.
  - Scoping: identify the textile product categories to be included in the plan
  - Target setting: the volume of the goods
  - Identification of gaps and solutions: potential improvement points for mid- and long-term plan e.g. challenges with the cycling infrastructures and potential recycling partners
  - Monitor the plan, update, and improve annually
  - Consider employing Life Cycle Assessment (LCA) and Life Cycle Costing (LCC) for the design decisions
  - Identify technical and scientific gaps for environmental impact quantification
- Any circularity data that may not be currently existing in GOTS Transaction Certificates can be noted on the “additional information” section of Product specifications (Box 10) and carried in the supply chain.

### FURTHER GUIDANCE:

- Article 5(1) of the ESPR. Article 5(1) of the ESPR lists the following ecodesign aspects:
  - durability
  - reliability
  - reusability
  - upgradability
  - reparability
  - possibility of maintenance and refurbishment
  - presence of substances of concern
  - energy use and energy efficiency
  - water use and water efficiency
  - resource use and resource efficiency
  - recycled content
  - possibility of remanufacturing
  - possibility of recycling
  - possibility of recovery of materials
  - environmental impacts, including carbon and environmental footprint
  - expected generation of waste
- GOTS suggests prioritising the following principles:
  - Increasing product durability properties, includes accessories
  - Possibilities to improve the lifespan through maintenance, and care
  - Right to repair
  - Recyclability potential
- Concerning healthy textile fibre material choice, GOTS as a processing standard for organic textiles, already requires minimum 70% of organically grown fibres, that is known the most sustainable practice for growing natural fibres. In addition, for the remaining 30% GOTS carefully elects the most sustainable fibres that is allowed to be blended with organic fibres.
- Concerning the chemical substance of concern, GOTS mandates the use of approved chemicals only that is in compliant with the GOTS chemical input criteria which ensures the stringiest requirements for chemicals that is non-toxic to environment and human.

## REFERENCES

- 1 ESPR final compromise text for a Regulation of the European Parliament and of the Council establishing a framework for setting ecodesign requirements for sustainable products, amending Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC. [Available at this link.](#)
- 2 The Green Deal. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. The European Green Deal. COM(2019) 640 final. [Available at this link.](#)
- 3 The Circular Economy Action Plan. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. A new Circular Economy Action Plan For a cleaner and more competitive Europe. COM(2020) 98 final. [Available at this link.](#)

# GOTS SECTION 6

## GOTS Section 6.1

“Specific requirements for Textile Personal Care Products”

### GUIDANCE

- Synthetic fibre components are not permitted for group II products.
- Synthetic security veils are not allowed for tampons.

### GOTS SECTION 6.1.2

#### GOTS Section 6.1.2.3 (a)

“Except for wound contact layers, barrier films shall be composed of biodegradable polymers. All raw materials used shall be non-GMO”

### EXEMPTION

- In case of reusable/washable personal care products (e.g. nappies, cloth pads), polyurethane (PU) layer, that is not in direct contact with the skin can be used for the purpose of leak proofing. In this case, GOTS Section 5.2.8 shall be followed for chemical residue compliance.

### GOTS SECTION 6.1.3

#### GOTS Section 6.1.3.4

“ Any fragrances, lotions and lubricants used shall comply – besides the input criteria of GOTS – also with the input criteria of the COSMOS-Standard (Cosmetics Organic and Natural Standard).”

### REFERENCE

- [COSMOS-Standard](#) (Cosmetics Organic and Natural Standard)

## GOTS Section 6.2

### GOTS SECTION 6.2.,b

“Important note: Any entity selling FCTs shall be aware of and meet the specific legal (hygienic and GMP) requirements applicable for its products and in the country/region where they are sold.”

### INTERPRETATION

- Applicable Legislation: All food contact textiles shall fall within the scope of the two European legislations:
  - a. Regulation (EC) 1935/2004 on materials and articles intended to come into contact with food, also known as the Framework or FCM Regulation
  - b. Regulation (EC) 2023/2006 on good manufacturing practices for materials and articles intended to come into contact with food, also known as the GMP Regulation.

- Alternative - Code of US Federal Regulation: 21 CFR § 177.2800: Textiles and Textile Fibres. Indirect food additives subpart C. Substances for use only as components of articles intended for repeated use.
- Additional requirements for individual countries based on local regulations will also be applicable for Food Contact Textiles (FCTs) should they be intended to be sold or used in such countries.

## REFERENCES

- a. [Regulation \(EC\) 1935/2004](#)
- b. [Regulation \(EC\) 2023/2006](#)
- c. [21 CFR § 177.2800](#)

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