

Guidelines for certification of organic textile products (GOTS)



1. General Description

The Global Organic Textile Standard (GOTS) is the worldwide leading textile processing standard for organic fibres, including ecological and social criteria, backed up by independent certification of the entire textile supply chain.

The aim of the standard is to define world-wide recognised requirements that ensure organic status of textiles, from harvesting of the raw materials, through environmentally and socially responsible manufacturing up to labelling in order to provide a credible assurance to the end consumer. Textile processors and manufacturers are enabled to export their organic fabrics and garments with one certification accepted in all major markets.

The International Working Group on Global Organic Textile Standard released the currently valid GOTS Version 3.0 on the 1st of March 2011 - GOTS Version 3.0 (PDF, 230 KB)

The new version is a result of a stakeholder input process in which various organizations with expertise in organic production, textile processing and social criteria participated. It follows the overall approach of GOTS to define high level verifiable environmental criteria throughout the entire processing chain of apparel and home textiles (including spinning, knitting, weaving, wet processing, manufacturing, and trading) made from a minimum of 70% certified organic fibers and requiring social minimum criteria while still providing for a practical set of requirements that is technically achievable even in large scale industrial textile production and for mass market brands and retailers in order to achieve a considerable environmental and social impact in the textile industry.

2. Applicability of the GOTS Certification System

The applicability of the GOTS certification system starts with the first processing step in the textile supply chain. In the cotton supply chain the ginning is considered to be the first processing step, whereas in the wool supply chain processing normally starts with the scouring.

Organic fibre production is not directly covered by the GOTS certification system as GOTS does not set standards for organic fibre cultivation itself. Instead cultivation of organic fibres is under the scope of the governmental organic farming standards (e.g. the EEC Organic Regulation or the USDA NOP). Organic fibres certified according to these recognised international or national legal standards are the accepted raw material inputs for the GOTS processing and manufacturing chains.

3. Scope of the Standard

The standard define requirements to ensure organic status of textiles, from harvesting of the raw materials, through environmentally and socially responsible manufacturing up to labelling in order to provide a credible assurance to the end consumer.

The standard covers the processing, manufacturing, packaging, labelling, trading and distribution of all textiles made from at least 70% certified organic natural fibres. The final products may include, but are not limited to fibre products, yarns, fabrics, clothes and home textiles.

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

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



4. Criteria of the Standard

The standard focuses on compulsory criteria only.

Some of the criteria are compliance requirements for the entire facility where GOTS products are processed whereas the others are criteria relevant for the specific products subject to certification.

Generally, a company participating in the GOTS certification scheme must work in compliance with all criteria of the standard.

CRITERIA RELEVANT FOR THE SPECIFIC PRODUCTS SUBJECT TO CERTIFICATION

Gots Criteria
2.1. Requirements for organic fibre production
2.2. Requirements for material composition
2.2.1. Products sold, labelled or represented as "organic" or "organic - in conversion"
2.2.2. Products sold, labelled or represented as "made with x % organic materials" or "made with x %
organic - in conversion materials"
2.3. General requirements for chemical inputs in all processing stages
Chemical inputs
As it is to date technically nearly impossible to produce any textiles in an industrial way without the use of
chemical inputs, the Standard define criteria for low impact and low residual natural and synthetic
chemical inputs (such as dyestuffs, auxiliaries and
finishes) accepted for textiles produced and labelled according to GOTS standard.
2.3.1. Prohibited and restricted inputs chemical <i>inputs</i>
2.3.2. Requirements related to hazards and toxicity
2.3.3. Assessment basis for chemical inputs
2.4. Specific requirements for processing and test parameters
2.4.1. Separation and Identification
2.4.2. Spinning
2.4.3. Sizing and weaving / knitting
2.4.4. Non-woven manufacture
2.4.5. Pre-treatment stages, wet processing
2.4.6. Dyeing
2.4.7. Printing
2.4.8. Finishing
2.4.9. Requirements for additional materials and accessories
2.4.12. Storage, packaging and transport
2.4.13. Record keeping & internal quality assurance
2.4.14. Technical quality parameters
2.4.15. Limit values for residues in GOTS Goods
2.4.16. Limit values for residues in additional materials and accessories

4.2. Testing of Technical Quality Parameters and Residues



COMPLIANCE REQUIREMENTS FOR THE ENTIRE FACILITY WHERE GOTS PRODUCTS ARE PROCESSED

Gots Criteria	
2.4.10. Environmental management	
2.4.11. Waste water treatment	
3. Minimum social criteria	
3.1. Scope	
3.2. Employment is freely chosen	
3.3. Freedom of association and the right to collective bargaining are respected	
3.4. Working conditions are safe and hygienic	
3.5. Child labour must not be used	
3.6. Living wages	
3.7. Working hours are not excessive	
3.8. No discrimination is practised	
3.9. Regular employment is provided	
3.10. Harsh or inhumane treatment is prohibited	
3.11. Social Compliance Management	
4. Quality assurance system	
4.1. Auditing of processing, manufacturing and trading stages	

5. Manual for Implementation of Global Organic Textile Standard Issue of 01 March 2011

The Manual for the Implementation of the Global Organic Textile Standard provides interpretations and clarifications for specific criteria of the Global Organic Textile Standard (GOTS) and related publications (e.g. the Licensing and Labelling Guide) approved by the Technical Committee of the International Working Group. The Manual is intended to prevent any inconsistent, inappropriate or incorrect interpretation of the standard and also contains requirements and detailed specifications for the application of the GOTS and the implementation of the related quality assurance system for certifiers. The interpretations, corrections and further clarifications as provided in this document are binding for all approved GOTS certifiers and users of the GOTS.

The currently valid issue of the Manual for the Implementation of GOTS was released alongside with GOTS Version 3.0 on 1st March 2011 and is available for download in PDF format: Manual for the Implementation (PDF, 175 KB).

6. Key criteria for processing and manufacturing

Environmental Criteria

- At all stages through the processing organic fibre products must be separated from conventional fibre products and must to be clearly identified
- All chemical inputs (e.g. dyes, auxiliaries and process chemicals) must be evaluated and meeting basic requirements on toxicity and biodegradability/eliminability
- Prohibition of critical inputs such as toxic heavy metals, formaldehyde, aromatic solvents, functional nano particles, genetically modified organisms (GMO) and their enzymes
- The use of synthetic sizing agents is restricted; knitting and weaving oils must not contain heavy metals
- Bleaches must be based on oxygen (no chlorine bleaching)
- Azo dyes that release carcinogenic amine compounds are prohibited
- Discharge printing methods using aromatic solvents and plastisol printing methods using phthalates and PVC are prohibited
- Restrictions for accessories (e.g. no PVC, nickel or chrome permitted, any polyester must be post-consumer recycled from 2014 onwards)



- All operators must have an environmental policy including target goals and procedures to minimise waste and discharges
- Wet processing units must keep full records of the use of chemicals, energy, water consumption and
 waste water treatment, including the disposal of sludge. The waste water from all wet processing units
 must be treated in a functional waste water treatment plant.
- Packaging material must not contain PVC. From 1st January 2014 onwards any paper or cardboard used in packaging material, hang tags, swing tags etc. must be post-consumer recycled or certified according to FSC or PEFC.

7. Technical Quality and Human Toxicity Criteria

- Technical quality parameters must be met (s.a. rubbing, perspiration, light and washing fastness and shrinkage values)
- Raw materials, intermediates, final textile products as well as accessories must meet stringent limits regarding unwanted residues

8. Minimum Social Criteria

Minimum social criteria based on the key norms of the International Labour Organisation (ILO) must be met by all processors and manufacturers. They must have a social compliance management with defined elements in place to ensure that the social criteria can be met. For adequate implementation and assessment of the following social criteria topics the listed applicable <u>key conventions of the International Labour Organization (ILO)</u> have to be taken as the relevant basis for interpretation.

9. Certification of the entire textile supply chain

A company participating in the GOTS certification scheme must work in compliance with all criteria of the standard.

The GOTS quality assurance system is based on on-site inspection and certification of the textile processing and trade chain.

Key criteria for fibre production

- Fibre producers (farmers) must be certified according to a recognised international or national organic farming standard (e.g. EEC 834/2007, USDA NOP) that is accepted in the country where the final product will be sold; organic fibre certification according to JAS (Japanese standard - is not possible. (-> per definition of JAS)
- Certification of fibres from conversion period is possible if the applicable farming standard permits such
 certification: certification of 'in conversion' ('in transition') status is not possible according to USDA
 NOP. (-> per definition of NOP)
- Certifiers of fibre producers must be internationally recognised according to ISO 65 and/or IFOAM
 accreditation. They also must be accredited to certify according to the applicable fibre standard

Key criteria for Processors and manufacturers)

Operators (Processors and manufacturers) from post-harvest handling up to garment making as well as
traders up to the import stage have to undergo an on-site annual inspection cycle and must hold a valid
GOTS operational certificate applicable for the production / trade of the textiles to be certified and
labelled as GOTS certified.



Certifiers of processors, manufacturers and traders must be internationally accredited according to ISO
 65 and must hold a 'GOTS accreditation' in accordance with the rules as defined in the 'Approval Procedure and Requirements for Certification Bodies'

10. Residue Testing

Stringent orientation values for unwanted residues are defined in the standard

- Licensed operators must undergo residue testing according to a risk assessment of contamination
- Additional samples may be taken by auditors and sent for analysis to ISO 17025 accredited labs

All details regarding **Residue Testing** are defined in the <u>Manual for the Implementation (PDF, 175 KB)</u> and in the <u>GOTS Version 3.0 (PDF, 230 KB)</u>.

11. Requirements for material composition

11.1 Products sold, labelled or represented as "organic" or "organic - in conversion" (Gots 2.2.1.)

No less than 95% of the fibre content of the products - excluding accessories - must be of certified organic origin or from 'in conversion' period (identified and labelled as specified in chapters 1.4 and 2.1 of the standard).

Up to 5% of the fibre content of the products may be made of non-organic fibres that are listed in chapter 2.4.9. The products must not contain any genetically modified fibres. Blending organic and conventional fibres of the same type in the same product is not permitted.

The percentage figures refer to the weight of the fibre content of the products in conditioned status.

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

11.2 Products sold, labelled or represented as "made with \times % organic materials" or "made with \times % organic – in conversion materials" (Gots 2.2.2.)

No less than 70% of the fibre content of the products - excluding *accessories* - must be of certified organic origin or from *'in conversion'* period (identified and labelled as specified in the chapters 1.4 and 2.1 of the standard).

Up to 30% of the fibre content of the products may be made of non-organic fibres that are listed in chapter 2.4.9. The products must not contain any genetically modified fibres. The products may contain a maximum of 10% of regenerated or synthetic fibres as listed in chapter 2.4.9, except that socks, leggings and *sportswear* may contain a maximum of 25% of those regenerated or synthetic fibres. Blending organic and conventional fibres of the same type in the same product is not permitted.

The percentage figures refer to the weight of the fibre content of the products in conditioned status.



12. Label grading and Labelling

Textile goods *Goods* (finished or intermediate) produced in compliance with this standard by a *Certified Operator* and certified by Bioagricert srl may be sold, labelled or represented as:

Label-grade 1: "organic" and the immediate reference	≥ 95% certified organic fibres,
"Global Organic Textile Standard" (or the short form	_ z z w coc w game plane,
"GOTS").	≤ 5 % non-organic natural or synthetic fibres
Label-grade 2: "made with (x %) organic materials"	≥ 70% certified organic fibres,
and the immediate reference "Global Organic Textile	
Standard" (or the short form "GOTS").	≤ 30 % non organic fibres, but a maximum of 10%
	synthetic fibres (up to 25% for socks, leggings and
	sportswear)

The only differentiation for subdivision is the minimum percentage of 'organic' / 'organic - *in conversion*' material in the certified product.

The remaining balance (up to 5% or 30% respectively) may be composed of non-organic fibres, including defined regenerated and synthetic fibres (25% at most for socks, leggings and sportswear and 10% for all other textile products).

Blending conventional and organic fibres of the same type in the same product is not permitted.

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

If raw fibres with the certified status 'organic - in conversion' are used instead of certified 'organic' fibres, the corresponding label grades are named 'organic - in conversion' respective 'made with x% organic - in conversion materials'.

Labelling of products as 'in conversion' is only possible, if the standard, on which the certification of the fibre production is based, permits such labelling for the fibre in question.

13. GOTS logo

Only textiles produced and certified according to the provisions of the standard can carry the GOTS label.

The Operator, before putting the product on the market, must have the GOTS certificate of conformity and the labels approved by BioAgriCert.

The GOTS logo may be used as on-product label to market GOTS certified textiles and intermediates. Its use on certified products is optional. No additional fee applies for the use of the GOTS logo

The GOTS logo always must be accompanied by a reference to the applicable label grade, by a reference to Bioagricert srl and/or Logo Bioagricert and a reference to the Company's name and/or licence

Where the GOTS logo is used, its application must be in compliance with the 'Licensing and Labelling Guide'.

All details regarding licensing and labelling including the amount of the respective licence fee are defined in the Licensing and Labelling Guide. Read more about 'Licensing and Labelling Guide'



14. GOTS CERTIFICATION PROCESS

GENERALITIES ON THE BIOAGRICERT CERTIFICATION SYSTEM

The certification system managed by Bioagricert is based on the following principles:

- 1. The quality of the product is linked to the quality of the process which includes production procedures and control of the activities done and the results obtained.
- 2. Only the evaluation of the whole process guarantees the product conformity.
- 3. Bioagricert does not replace the operator who is responsible for products conformity and for respecting production and control procedures ($\underline{\text{company auto control}}$: 1^{st} level of auto $\underline{\text{control}}$).
- 4. Bioagricert should verify that the operator always respect what indicated in the previous point and all the duties indicated in the contract and in the present regulation (third party control: 2nd level of auto control).
- 5. The operator should demonstrate to respect the requirements of conformity.
- The requirements of conformity are measurable and verifiable.

The surveillance activity (3rd level of auto control) on the certification system and on the activity done by Bioagricert is carried out by the Competent Authorities and by the Accreditation Bodies.

14. 1 Certification requirements

The requirements that the operators must respect are:

- the GOTS Standard, elated documents and related regulations (national, regional, international)
- the BAC guidelines and BAC documents for GOTS certification
- BAC regulation for GOTS certification
- Price list for the Certification Doc. TB GOTS, BioAgriCert price list.

The above mentioned documents are provided to applicants via ordinary mail or e-mail and can also be found on the internet site www.bioagricert.org.

14. 2 GOTS certification regulation

The certification regulation describes:

- the conditions and the procedures for concession, vigilance, extension, suspension, resignation, renewal and revocation of the certification;
- the description of requirements and procedures of evaluation and certification;
- the description of the rights and duties of he who applies for certification;
- the rules for usage of conformity trademarks, the precautions to adopt for advertisement and the modalities to correctly refer to the certification;
- the procedures for treating complaint, the appeal and the contentious;
- the engagements subscribed to by the licensee.

Regulation is approved by CSI.



14.3 Registrations maintained by the operators

Operators who carry out production activities must maintain financial book-keeping and a warehouse where the following information must be registered:

- the nature, the quantity, the supplier and the exporter of incoming products (input)
- the destination for these products (process)
- the nature, the quantity and the destination of outgoing products (output)

There must be a correspondence within the book-keeping between incoming quantities and outgoing quantities and the information must be justified by the necessary documents (turnover, certifications, work modules, etc).

Operators who carry out importation activities must maintain a financial book-keeping and a warehouse where the following information must be registered:

- the nature, the quantity and the exporter of incoming products (input)
- the nature, the quantity and destination of outgoing products (output)

There must be a correspondence within the book-keeping between incoming quantities and outgoing quantities and the information must be justified by the necessary documents (turnover, importation certificates, etc.).

The Operators must maintain the registrations relative to the process, the product, the complaints and the conformity. The registrations are utilized by BAC for evaluation.

14. 4 Registration and complaint management

Operators must register all known complaints and the documentation of corrective actions undertaken, in order to avoid repetition. The Licensee must also consider anticipated complaints to eventual sublicensees for whom they assume the responsibility of product conformity. Registrations can be recorded in the licensee's own registers.

15. ACCESS TO THE GOTS CERTIFICATION SCHEME

BAC quarantees:

- free access to the certification scheme to all whose activity pertains to the field of application of certification and possess applicable requirements.
- no discrimination of whatever kind and in particular: conditions of financial or debts of any nature;
 evaluation and certification access is not conditioned by the dimensions of the operator or membership to particular associations or groups;
- equality regarding treatment of applicants and in particular the evaluation of access to applications follows the protocol numbering in entrance and the rejected requests are submitted to the validation of the CSI

BAC accepts the applicants, regardless whether their applications concern the entire processing chain, parts thereof or single operators.

In case Operators are submitted to other Certification Bodes for the same certification scope, BAC will inform the other Certification Body and will seek information in order to prevent misuse of certificates. In this case, BAC will evaluate, during the inspections all registrations, for the activity controlled.



16. PRELIMINARY VISIT

Before acceding to the control system, the operator may require a preliminary inspection during which BAC inspector visits the whole company and expresses an opinion on the practicability of the organic methods; he also values the available documents, points out eventual lacks and registers the inspection results on the inspection Report that must be countersigned by the operator.

The preliminary inspection should be paid by the applicant according to BAC fees.

17. CERTIFICATION PROCESS PHASES

17.1 Information for operators and Application procedures

BAC provides to the Applicant the following documents for GOTS certification:

GOTS official documents:

- The current version of GOTS and corresponding relevant documents released by the IWG Program changes, including regular updates of procedures and standards;
- Labelling and Licensing Guide,
- Manual for the Implementation of the GOTS and other provisions of the GOTS certification program as provided by the IWG;

BAC documents:

Master Application form	221
Master Technical Report	222
Master Product composition - formulation	223
Master Chemical input list	224
Master Suppliers list for organic fibres and conversion	225
Master Additional materials and accessories list	226
Master Social Criteria Management	227
Master Sub contractor list	228
Master Environmental management	229
Master Working conditions.	230
Regulation for GOTS certification	
Guidelines for GOTS certification	
Pricelist - fees for certification	

The documentation is sent also sent to applicants by mail or e-mail and can also be found on the internet website www.bioagricert.org.

The fees for certification are elaborated and approved by the CdA and submitted to the validation of the CSI.

The evaluators and the BAC sector managers are able to settle eventual doubts and interpretative divergences of the documentation sent to applicants.



17.2 Application for GOTS certification

The applicant for GOTS certification has to complete the Application Form - M 221 and send it to BAC via ordinary mail or e-mail. Document submitted must be signed by a duly authorized representative of the operator.

The applicant has to provide all information specified in the application form.

17.3 Review of application

When the application is received, the BAC Sector Manager charges an evaluator (RDP) for the evaluation of the application; the assignment is made on the basis of specific skills for GOTS evaluation and absence of conflicts of interest.

RDP evaluates the completeness of Application, prepares the Offer for certification and send it to the applicant.

If CC believes that BAC itself is not able to develop its activity of certification due to the field of application, the operative seats of the applicant and any other particular requirement as the applicant's language, it communicates to the operator the rejection of the application.

The Applicant for certification sends to BAC the signed Offer, provides for the payment of the fee (as specified in the offer) and sends via ordinary mail or e-mail the following documents:

Master Technical Report	222
Master Product composition - formulation	223
Master Chemical input list	224
Master Suppliers list for organic fibres and conversion	225
Master Additional materials and accessories list	226
Master Social Criteria Management	227
Master Sub contractor list	228
Master Environmental management	229
Master Working conditions	230

The applicant has to provide all information specified in the documents listed above.

Documents submitted must be signed by a duly authorized representative of the operator.

BAC, on receipt of the signed Offer, the payment of the fee and the documents listed above puts the Company data in the database, gives the Applicant a unique identification code and **prepares the Protocol of agreement** (contract).



17.4 EVALUATION PROCESS

The evaluation process consists of several phases.

The BAC sector manager instructs an evaluator (RDP) for the evaluation of the documentation; the assignment is made on the basis of specific skills for GOTS evaluation and absence of conflicts of interest.

The evaluation activity is carried out by RDP - Function proposing the certification.

Preliminary assessment of the documentation

At this stage RDP makes a technical assessment of the documentation submitted by the applicant in order to determine that it is complete and properly filled in, and to ensure that products and processes comply with the requirements for certification. RDP evaluates the documentation with the Applicant's request, for the decision about the operator's acceptance into the BAC control system.

In particular RDP evaluates:

- The operator's ability to comply with all GOTS certification requirements (and applicable related procedures) and BAC certification requirement;
- The conformity of the raw materials, auxiliary materials and inputs used in manufacturing processes as determined by GOTS and related doc
- The conformity of the sources of supply (for agricultural raw materials, auxiliary materials, inputs)
- The conformity of the activities, products and processes subcontracted (sub contractor)
- The conformity of products and processes as determined by GOTS (and related doc) and the requirements for certification
- The Environmental management Policy;
- The Social Compliance Management Policy
- labels and advertising projects (eventual)

Evaluation activities are undertaken in compliance with the rules provided by the Global Organic Textile Standard (GOTS), the Manual for the Implementation of the Global Organic Textile Standard, the BAC Quality Manual and the specific BAC procedures for GOTS evaluation.

17.5 Result of preliminary assessment

- a) In case of inconsistency or fail for lack of documentation, RDP informs the Operator of the deficiencies and non-conformities and communicate the limits within which the supplementary documentation must be submitted. b) If within the time allowed the applicant does not provide for adjustment of the documentation, the application expires. In this case, RDP submits the dossier to the Sector Manager who asks the operator to apply corrective actions and the integration of the documentation, deciding the time for the adjustment. If within the deadline the operator demonstrates he has carried out the corrective actions, eliminating the lacks found, BAC will repeat only the necessary parts of the initial inspection and of the tests and the CC deliberates for the certification. In the contrary case, the CC rejects the application specifying the reasons for denial, with clear reference to the GOTS criteria or other certification requirement violated.
- c) If COMPANY has sent in a timely manner the documentation integrative in response to Non Conformity and integrative documentation is satisfactory for the closure of the NC, RDP send to the Applicant the acceptance of Corrective Action and proceeds to the scheduling of INITIAL INSPECTION.



17.6 Preparation of initial inspection

BAC, after completing the evaluation of the documentation, proceeds in Preparation of inspection and in particular:

- Select an inspector with specific skills to perform the inspection (qualifications, no conflicts of interest, knowledge of the language); the selection of the inspector is also based on geographic location of the company.
- agrees with the company the date of inspection
- Prepares the specific visit program (Master 237) for the applicant; the program also includes the Inspector/s in charge of verification
- Sends the visit program to the applicant and to the inspector (at least 7 days before the date of verification)

The program gives a detailed activities: the objectives of the audit, organizational units and processes to be audited, the place and date of the audit will be carried out; the name of the inspector/s.

The composition of the audit team will be deemed as accepted if not received within 5 working days, written and justified reasons for a possible objection.

RDP inform the inspector about any non-conformities and the associated requests for corrective action issued previously, in order to enable the inspector to verify whether the non-conformities have been resolved.

18. INITIAL INSPECTION

The inspection protocol includes the following key elements:

- Initial Meeting (to confirm the scope of verification and proceed with the planning of specific activities, identifying staff member)
- Evaluation of company documents (technical reports submitted by the operators and related doc)
- Evaluation of GOTS requirements, relevant to the products / processes
- Verification of the effectiveness of the concrete measures taken and the application of the good working practises;
- Review of bookkeeping (records and accounts) in order to verify flow of GOTS goods (input/output reconciliation, mass balance calculation and trace back lots and shipments). This is a key aspect of the inspection of any operation that sells/trades GOTS goods.
- Assessment of the processing and storage system through of visits to the applicable facilities and storage units (which may also include visits to non-organic areas if there is reason for doing so);
- Assessment of the separation and identification system and identification of areas of risk to organic integrity
- Verification of High-risk situations (Parallel processing of GOTS and non-GOTS products handling and documentation regarding (wet-)processing, storage and sales)
- Inspection of the chemical inputs (dyes and auxiliaries) and accessories used and assessment of their compliance with the applicable criteria of the GOTS
- Inspection of the waste water (pre-) treatment system of wet processors and assessment of its performance.
- Verification of adherence to the defined minimum social criteria (interview with management, confidential interviews with workers, personnel documents, physical on-site inspection, unions/stakeholders)
- 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
- Verification that non-conformities issued previously have been resolved and associated corrective action have been implemented
- Verification that changes to the standards and to related requirements have been effectively implemented;



- signalling the deviation from the norm and the contestation of eventual non-conformities.
- Final meeting to present the results of the inspection and NC (eventual)

The inspector can also collect samples of product or raw materials for the execution of laboratory tests or analysis (if required by the sampling plan).

The results of inspection are formalized in the M231 - INSPECTION REPORT, M 32 - sampling (if required by the sampling plan) and in M34 - non-conformity (eventual), countersigned by the operator (or delegate) who receives a copy.

During the closing meeting the inspector presents the results of inspection, discusses the non-conformities identified and provides explanations on the iter and timing for management of non-conformity.

The result of the inspections is considered confirmed if the operator does not receive a different communication from BAC within 60 days from the inspection.

19. FINAL EVALUATION AND CERTIFICATION DECISIONS

At this step RDP reviews the completeness of documents, and in particular:

- Inspection Report
- non-conformity reports (eventual)
- test reports (eventual)
- eventual additional inspection visit for verification closure of NC
- Labels conformity

Evaluation activities are recorded in the forms (M 238 and M 239).

19.1 Proposal of certification (RDP)

If the evaluation result is positive, RDP proposes the product certification to the Sector Manager for the operator's enrolment in the LdL and the granting of the *Certificate of Conformity*. In case of non-conformities which compromise the proposal of certification, RDP sets out the reasons and submitte the dossier to the attention of the Sector Manager who puts on the agenda the following Certification Committee meeting.

20. ENROLMENT INTO THE LICENSEES LIST AND CERTIFICATION GRANTING

Deliberation of certification (certification decision): the proposal of certification made by RDP is submitted to the Sector Manager who, if approves it, deliberates the operator's enrolment in the LdL and the granting of the *Certificate of Conformity*.

In case of non-conformities (e.g. major non-conformities) which compromise the granting of the certification, the Sector Manager submits the dossier to the CC, who asks the operator to apply corrective actions and the integration of the documentation, deciding the time for the adjustment.

The applicant must submit to BAC, on time, a comprehensive documentation which shows that preventive and corrective actions have been implemented.

If within the deadline the operator demonstrates he has carried out the corrective actions, eliminating the lacks found, BAC will repeat only the necessary parts of the initial inspection and of the tests and the CC deliberates for the certification.

In the contrary case, the CC rejects the application specifying the reasons for denial, with clear reference to the GOTS criteria or other certification requirement violated.

With the deliberation of the Sector Manager or the Certification Committee, there is the:



- granting of the GOTS Certificate of Conformity;
- operator's enrolment in the LdL for the certified products;
- approval of the labels and granting the Logo application (Bioagricert Logo and GOTS logo) (eventual)
- granting of the GOTS transaction certificate (if requested);

20.1 Certification ratification

Certification ratification (CSI): the ratification of the *Certificate of Conformity* and the validation of the rejected demand are managed by the CSI.

The activity of ratification includes the evaluation of a licensees' sample, selected on the basis of the norms UNI ISO 2859. The evaluation regards the whole procedure of certification and consists of an analysis of the grade of satisfaction of the applicable requirements, defined by this OM and by the reference norm.

21. CERTIFICATION DOCUMENTS

21.1. GOTS conformity certificate (= operational certificate, scope certificate) includes the following information:

- The name and address of the operator whose products are the subject of certification (processors, manufacturers and traders);
- Name and address of Bioagricert srl
- The scope of the certification granted, including:
- lists of the certified products (and the production stages), which may be identified by type or range of products,
- The standard that is the basis for the certification (=GOTS), and
- The effective date and term of certification (date of first issue and expiring date 3 years)
- identification and revision number and the conditions for the validity
- distribution list;
- page number and the sign of the sector manager who issued it.

21.2. Transaction certificate

The Transaction certificate is a certificate of the product linked to one or more consignments of GOTS Goods or to one or more transactions, which can be added or alternative to the Certificate of Conformity.

The Transaction certificate contains the same information required for declarations of conformity issued by the licensee with the difference that is emitted by the CB.

The Transaction certificate will be issued when requested by the GOTS certified Operator.

BAC ensures that the Transaction certificate will be in line with the following interpretation provided by tha Gots Manual: .

21.3 Conformity declarations granted by the licensee

They are documents issued by the licensee; they are all identified with "declarations of conformity granted by the supplier" in agreement with the norm UNI EN ISO 17050. They should always been covered by a *Certificate of Conformity*. They are documents under controlled emission and should be managed by the operator in order to guarantee the chance to retire the products from the market.

The addressees of the certified products must be informed directly by the Operator in cases of non-conform products or withdrawal of the certification by BAC.



22. GOTS LICENSING AND LABELLING

Labels are declarations of conformity issued by the operator for the <u>products destined</u> to the <u>consumer</u> (directly or indirectly through logistic platforms).

The Operator, before putting the product on the market, must have the *certificate of conformity* and the *labels* approved by BioAgriCert.

GOTS logo may be used as on-product label to market GOTS certified textiles and intermediates. Its use on certified products is optional. No additional fee applies for the use of the GOTS logo.

The GOTS logo always must be accompanied by a reference to the applicable label grade, by a reference to Bioagricert srl and/or Logo Bioagricert and a reference to the Company's name and/or licence.

All details regarding licensing and labelling including the amount of the respective licence fee are defined in the Licensing and Labelling Guide. Read more about 'Licensing and Labelling Guide'

Sample of label application:

Using 95 - 100 % organic fibres:



Organic

certified by [certifier's ref.] Licence no [1234]

Certify by Bioagricert srl



Licence Operator n° (n° of certificate GOTS)

Or Company's name



Using 70 - 94 % organic fibres:



Made with [x] % organic materials

certified by [certifier's ref.] Licence no [4321]

Certify by Bioagricert srl



Licence Operator n° (n° of certificate GOTS)

Or Company's name

23. MAINTENANCE OF THE CERTIFICATION

Once the certificate is issued, the operator should always maintain the requirements of conformity according to the law and to The Global Organic Textile Standard (GOTS).

In order to maintain the conformity, the operator should:

- 1. always comply with Bioagricert Regulation on Global Organic Textile Standard and all provisions of the GOTS certification program as provided by the IWG;
- 2. always comply with the BAC Protocol of agreement for GOTS certification
- 3. issues declarations on the certification only for the scopes for which the certification has been issued;
- 4. issues declarations of conformity only when he is sure of the product conformity according to the requirements of the certification scheme; if the operator suspects that a product is not conforming, he should immediately cancel any reference to the organic method from the product or identify and separate it from conforming products. The operator can process and sell the product only after eliminating any doubt on its conformity or he can sell the product without any reference to BAC certification and the organic method;
- 5. communicate to Bioagricert (within 30 days) any changes in the product, process or management system which may modify the conformity;
- 6. inform BAC on any accidental events that may modify the conformity and if he is involved in legal proceedings concerning the product conformity;
- 7. records complaints and keep all documents concerning corrective actions taken. The operator should consider also complaints coming from sub licensees for whom he is responsible.



The operator, making the certification public, should respect the following conditions:

- should clearly and exclusively refer to the products for which he has obtained the certification and should not confuse consumers on certified and not certified products;
- should send advertising projects concerning certified products to Bioagricert for approval before publishing them, especially the projects which are destined to consumers;
 Deceptive advertisements are considered a non conformity and lead to a sanction. The incorrect use of trademarks and certificates, for example due to printing mistakes, may lead to the suspension and withdrawal of the certification and also to damage claim if no corrective actions are immediately taken (e.g. prove it was only a mistake). False assertions and the counterfeiting of trademarks and certificates are legally prosecuted;
- should respect the use of trademarks of conformity in accordance with the provisions of the GOTS Labeling and Licensing Guidethe reference norm.

24. SURVEILLANCE ACTIVITY

Until the operator is enrolled in the certification and control system, BAC carries out the surveillance according to the evaluation activities.

The surveillance activity has the aim to guarantee always the conformity with the requirements required, and in particular to:

- Ensure that products marketed with references to the certificate comply with the characteristics referred to GOTS;
- ensure the maintenance of the adequacy of structures, organization and process;
- ensure the full implementation of all the provisions of the GOTS;
- ensure that changes to the product, the manufacturing process or quality system not compromise the conformity of the product and they comply with the provisions of the GOTS.
- verify that the trademarks on the product and advertising are used in accordance with the provisions of the Regulations and GOTS GOTS Licensing and Labelling
- take samples of products and / or raw materials for the execution of tests or laboratory tests, in accordance with the sampling plan

All operator's seats must be submitted to the annual on site inspection according to GOTS rules and interpretation specified in the GOTS Manual-Issue of 01 March 2011.

All operator's seats must be opened to the BAC inspector who carries out the inspection activity, even if without notice, at any time during the working hours and there must always be someone who should cooperate with the inspector.

The following kind of inspections is provided:

- announced inspections of the whole productive process (both GOTS and non GOTS), with notice of the operator;
- **non-announced** inspections, without notice; they usually control the productive process and can also control the **distribution** in order to verify the labels, trademarks, information for the consumer and take samples of products for the execution of tests or laboratory tests in accordance with the sampling plan
- Further inspections for the following cases: licence extension; licensees that are always able to comply
 with the certification requirements; new products or changing of the product, process, management
 system that can influence the conformity of the certified products.



25. LICENCE EXTENSION

The following possibilities for the licence extension are provided:

- extension of the *certificate of conformity* to new products;
- extension to new kind of activities and/or new operative units: processing lines, productive seats.

The licensee, to request the extension, must send the documentation provided for the request. The Sector Manager, when he/she receives it, values the necessity of new inspections and evaluation procedures. On the basis of the inspections result, the Sector Manager or the CC, decides on the licence extension and grants the new certificate

26. Renewal of certification

In general, re-evaluation follows the procedures for initial evaluation.

Operator shall send to BAC the application for Renewal of certification 1 month before the expiration date of the certificate in order to maintain the validity of certificate.

Bioagricert, before the expiry of the Protocol for the GOTS certification, will proceed to the renewal of the Protocol and the certificate of conformity (document review, inspections at the applicant and the units involved).

27 RENUNCIATION OF CERTIFICATION

The operator may renounce to certification at any time by sending a written communication to BAC and to the Competent Authorities. The operator may renounce to certification for the following reasons:

- he does not want to conform to new certification conditions;
- he closes the business which is object of control and certification;
- he wants to change CB.