GLOBAL ORGANIC TEXTILE STANDARD
ECOLOGY & SOCIAL RESPONSIBILITY

MANUAL FOR THE IMPLEMENTATION OF GRTS

Draft 2.0

BASED ON THE GLOBAL RESPONSIBLE TEXTILE STANDARD (GRTS)

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This document provides interpretations and clarifications for specific criteria of the Global Responsible Textile Standard (GRTS) and related official reference documents (e.g. Conditions for the Use of Signs - GRTS) 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 GRTS and the implementation of the related quality assurance system for Approved Certification Bodies. 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 *Approved Certification Bodies* and users of GRTS where felt necessary, as it can be updated short-term.

The interpretations, corrections, and further clarifications as provided with this document are binding for all *Approved Certification Bodies* and users of the GRTS. 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 GRTS retain their assessed/certified/approved status.

This Manual draws heavily from the interpretations of the Global Organic Textile Standard (GOTS) since GRTS is a Standard fundamentally based on GOTS.

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.

GRTS welcomes corrections or further inputs to this document from all stakeholders. Comments may be sent to revision@global-standard.org.

Note:

In this Manual, the relevant Sections of GRTS are quoted to which the interpretations and further clarifications refer to. Partial wording taken from GRTS 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:

GRTS and the Manual for the Implementation of GRTS, reference documents and any further relevant public information as released by Global Standard gGmbH are available for public download on the Global Standard website

ABOUT GRTS

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

Document History

No earlier version of this document has been released.

Further information is available at: www.global-standard.org.

TABLE OF CONTENTS

THE OFFICIAL INTERPRETATIONS FOR SPECIFIC CRITERIA OF THE GLOBAL RESPONSIBLE TEXTILE STANDARD (GRTS) VERSION 1.0

GRTS SECTION 1

GRTS Section 1.2

GRTS 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 GRTS.
b. GRTS 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 "GRTS" as a whole. It is not possible to certify and label only a part or a component of a product.

GRTS SECTION 1.2.6

"…The Certified Entity shall follow GRTS criteria or the local legal requirements, whichever affords higher protection to people and the environment."

INTERPRETATION

a. GRTS 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 GRTS criteria, GRTS criteria would take precedence for the Certified Entities.
c. This is applicable to all aspects of GRTS criteria, including environment, social, building safety, the legality of business, and so on.

GOTS SECTION 1.2.10[1]

"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 GRTS."

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

1 This interpretation is identical to that of GOTS Section 1.2.10

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 GRTS 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 GRTS 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 GRTS, 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.
- GRTS 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. Global Standard Approved Certification Bodies shall also consider auditors' guidance as provided by GRTS.

INTERPRETATION

- Adverse impacts can be considered harmful impacts on matters covered by the GRTS 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.

REFERENCE

- OECD (2018), 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 (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

GOTS SECTION 1.2.11

"GRTS sets criteria for working and social conditions that are equivalent to those of leading social sustainability standards."

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.

GRTS SECTION 2

GRTS Section 2.1

GRTS SECTIONS 2.1.1 AND 2.1.2

"2.1.1 The key requirement of responsible fibres allowed in GRTS shall be that they are certified to standards that adhere to the following principles and criteria:

2.1.1.1 Chain of custody with identity preservation

2.1.1.2 Third-party certification scheme

2.1.1.3 No Genetically Modified Organisms (non-GMO)

2.1.1.4 No Highly Hazardous Pesticides used in production (HHPs)

2.1.1.5 Respect for animal welfare, including no live lamb cutting (mulesing)

2.1.1.6 Non-toxic, closed-loop manufacturing for manmade fibres

2.1.1.7 Cellulose feedstock to be non-GMO & from responsible forestry

2.1.1.8 Biopolymers shall be biodegradable and responsibly sourced

2.1.1.9 Inclusion of social norms in manufactured fibre production"

INTERPRETATION

Key requirements of fibre standards accepted within GRTS are enumerated below.

A) Chain Of Custody With Identity Preservation

GRTS traceability is modelled on chain of custody through physical segregation and identity preservation, not mass balance. Therefore, fibre production standards are required to provide physical chain of custody.

Although there are also private-label standards/brands that offer traceable and responsible fibres through their own internal verification systems, the level of transparency required for GRTS means that only third-party certification schemes shall be considered. Schemes that prescribe or follow the ISO 17065 "product certification bodies accreditation standard" criteria shall be accepted.

B) Third-Party Certification Scheme

Third-party certification requires that the standard setter and Certification Body are separate entities.

However, non-natural fibres, such MMCF (e.g. lyocell), generally do not have independent third-party certification standards and therefore require a different approach. GRTS shall accept MMCF manufactured in closed-loop systems, using feedstock from responsible forestry (FSC, PEFC).

Traceability shall be established by approved certification bodies (CBs) reviewing documentation from the fibre manufacturer to ensure compliance with GRTS requirements, such as declaration/certificate of authenticity.

Proof of compliance from third parties will include ISO standard certifications, thereby fulfilling this requirement without the framework of a fibre production standard.

C) No Genetically Modified Organisms (Non-GMO)

Global Standard considers GMOs contrary to the principles of responsible textiles. Fibres that can be used in GRTS shall be grown without the use of genetic modification technologies. GMO tests will be used as proof of compliance with this requirement when a fibre production standard does not explicitly prohibit the use of GMOs. This criterion is most relevant to cotton fibres, though it also applies to the source of feedstock used in manufacturing cellulosic fibres. As required by GOTS for organic cotton, a non-GMO test (ISO 5354-1 and ISO 5354-2, earlier designated ISO IWA 32*)* shall also be required for responsible cotton.

Regardless of a fibre standard's stance on GMO (against or neutral), fibres certified to standards that do not prohibit GMO may still qualify as "responsible" if they can prove their non-GMO status through recognised negative GMO tests.

d) No Highly Hazardous Pesticides Used In Production

In line with the ecological and social protection requirements in Global Standard's mission and vision, only fibre production standards that prohibit the use of Highly Hazardous Pesticides during production can be considered for GRTS.

The Food and Agriculture Organization (FAO) and the World Health Organization (WHO) (UNEP, 2021) state that:

"Pesticides are inherently hazardous, and among them, a relatively small number of Highly Hazardous Pesticides (HHPs) cause disproportionate harm to environment and human health

including severe environmental hazards, high acute and chronic toxicity." "Highly Hazardous Pesticides means pesticides that are acknowledged to present particularly high levels of acute or chronic hazards to health or environment according to internationally accepted classification systems such as WHO or Global Harmonized System (GHS) or their listing in relevant binding international agreements or conventions. In addition, pesticides that appear to cause severe or irreversible harm to health or the environment under conditions of use in a country may be considered to be and treated as highly hazardous."

Global Standard accepts the following lists as they pertain to Highly Hazardous Pesticides in the natural fibre and forestry sectors:

- Pesticide Action Network (PAN) 2024. *PAN International List of Highly Hazardous Pesticides.*358 pesticides listed. https://pan-international.org/wp-content/uploads/PAN_HHP_List.pdf
- Forest Stewardship Council (FSC). 2024.*Lists of Highly Hazardous Pesticide.*50 pesticides listed. https://connect.fsc.org/document-centre/documents/resource/315

E) Respect For Animal Welfare

Responsible animal husbandry is required to deliver required to ensure the well-being and humane treatment of animals

Animals shall be granted the five freedoms from: hunger; thirst; discomfort; injury; and illness/anxiety.

No Live Lamb Cutting (Mulesing)

Live lamb cutting, also known as "mulesing," is the practice of removing wool-bearing skin around the anus of sheep to prevent flystrike in susceptible sheep breeds. Given it causes acute pain to lambs and that it is deemed unnecessary in responsibly managed grazing systems, no mulesed wool is accepted. If mulesing is prohibited by local regulations or laws, their reference shall be considered adequate proof of compliance (e.g. in New Zealand).

If a standard does not explicitly prohibit mulesing (e.g. Australia's National Standard for Organic and Bio-Dynamic Produce), a third-party certificate of conformity can be used, such as ZQ. The Responsible Wool Standard (RWS) is also reliable proof of non-mulesing for independently certified producers.

F) Non-Toxic, Closed Loop Manufacturing For MMCF And Synthetic Fibres

The manufacturing of MMCF such as lyocell, modal, and viscose, shall be done with feedstock that is responsibly sourced, meaning its cultivation and/or harvesting does not contribute to deforestation, and does not utilize Highly Hazardous Pesticides or GMOs.

Facilities that manufacture regenerated cellulosic fibres and biopolymers shall utilize closed-loop manufacturing processes and non-toxic inputs. This can be demonstrated through certification to ISO 14001: Environmental Management Systems, or alternative equivalent standards.

G) Cellulose Feedstock From Non-GMO And Responsible Forestry

Cellulosic feedstock used in regenerated fibres shall have FSC or PEFC certification to demonstrate that it came from responsible forestry. The feedstock shall additionally be non-GMO.

H) Biopolymers Shall Be Biodegradable And Responsibly Sourced

Biopolymers (e.g. protein or cellulose based) shall be biodegradable, as defined by internationally applicable standards and carry a certificate of conformity, and they additionally shall be made with responsibly sourced feedstock, i.e., non-GMO crops and responsible forestry. Micro-organisms used for biosynthesis shall be non-GMO.

Biodegradability standards are listed below:

Standard	Applicability	Test Environment	Key Criteria
ISO 14855	International	Composting (Aerobic)	CO_2 evolution ≥ 90% in 180 days
ISO 17556	International	Soil (Aerobic)	CO_2 evolution in soil
ISO 11734	International	Anaerobic (Sludge)	Biogas (CH_4 + CO_2) production
ISO 16929	International	Composting (Disintegration)	Physical breakdown <2mm in 12 weeks
EN 13432	Europe	Composting (Industrial)	Biodegradation, disintegration, ecotoxicity, heavy metals
EN 14995	Europe	Composting (Industrial)	Same as EN 13432, for non-packaging

ASTM D6400	USA	Composting (Industrial)	Biodegradation & disintegration in 180 days
ASTM D5988	USA	Soil (Aerobic)	CO_2 evolution in soil over 6 months
ASTM D5511	USA	Anaerobic (Landfill)	Biogas evolution under anaerobic conditions

l) Inclusion Of Social Norms During Fibre Manufacturing

Manufactured fibres (e.g. biopolymers, MMCF, recycled synthetics) shall show compliance to social welfare norms in their manufacturing facilities, as specified by the International Labor Organization (ILO). Compliance shall be demonstrated through third-party certification to standards such as ISO 45001 (Occupational Health and Safety Management Systems).

Note:

Social criteria for natural fibre production are not currently included in the requirements for responsible fibre standards, because existing natural fibre standards focus on environmental protection, delegating social protection norms to national legislation. It is likely that social criteria at the farm level be introduced in future revisions of GRTS with guidelines for how auditors are to assess compliance.

GRTS SECTION 2.1.2

2.1.2 Responsible fibres shall also be produced with due consideration for:

2.1.2.1 Reduction of GHG emissions

2.1.2.2 Reduced water use and contamination

2.1.2.3 Protection of soil health and biodiversity

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DUE CONSIDERATION CRITERIA FOR GRTS FIBRE SELECTION

The following are preferred but not necessarily required for consideration of standards as responsible due to incongruencies regarding methods for measurement and verification. It is nevertheless expected that responsible fibre standards address these criteria in some manner. It is also intended that more specific criteria shall be explored – and included - over time to ensure consistency and efficacy.

a) Reduction of GHG emissions

Responsible fibre production requires consideration of greenhouse gas (GHG) emissions and integration of requirements that contribute to climate change mitigation and/or adaptation. While GHG accounting is ultimately necessary to quantify and monitor impact to ensure that emissions are being reduced, fibre production standards that integrate requirements that indirectly contribute to GHG emission reduction also qualify. This can be demonstrated through requirements such as reducing the use of pesticides and synthetic fertilizers, both of which use considerable amounts of energy in their production and use, increased energy efficiency, use of renewable energy on farms, increased soil carbon, etc.

b) Reduced water-use and contamination

Responsible standards shall require that fibre production does not cause water pollution and does not overdraw limited water resources, ensuring that local communities are not deprived and ecosystem functions are not undermined. Use of buffer zones, rainfed agriculture, and drip-irrigation in contrast to inefficient flood irrigation, are examples of preferred practices.

c) Soil health and biodiversity

Responsible standards require fibre production methods that prevent soil degradation and protect biodiversity habitat. Examples are practices such as crop rotations, rotational grazing, use of cover crops, minimum tillage, care for farm biodiversity, and limited use of synthetic pesticides and fertilizers.

GRTS SECTION 2.1.6

"2.1.6 The Implementation Manual of GRTS includes detailed information about fibre selection criteria, a list of allowed fibre standards and how this list shall be reviewed and updated."

STANDARDS THAT COMPLY WITH GRTS'S RESPONSIBLE FIBRE CRITERIA, WITH ADDITIONAL SUPPORTING EVIDENCE AS APPLICABLE

a) MULTI-FIBRE STANDARDS (with proof of non-GMO and no-mulesing)

1. Organic – IFOAM Family of Standards (*also organic in-conversion)*
    a. *Organic Australia (requires non-mulesing verification)*
2. Organic – non-IFOAM (*also organic in-conversion)*
3. Regenagri ***(post HHP phaseout)***
4. Regenevate

b) COTTON FIBRE STANDARDS (with non-GMO proof)

5. Better Cotton
6. Cotton Connect REEL
7. Cotton Made in Africa
8. myBMP Australia
9. Regenerative Cotton Standard
10. Responsible Brazilian Cotton

c) BAST FIBRE STANDARDS

11. Masters of Flax Fibre
12. Responsible Hemp Standard

d) ANIMAL FIBRE STANDARDS

13. Responsible Wool Standard
14. Good Cashmere Standard
15. SFA Animal Fibre Standard
16. Responsible Alpaca Standard
17. Responsible Mohair Standard
18. ZQ Natural Fibre Standard

e) MANMADE FIBRES / RECYCLED FIBRE / FEEDSTOCK STANDARDS

19. Forest Stewardship Council (FSC)
20. Programme for the Enforcement of Forest Certification (PEFC)
21. International Sustainable and Carbon Certification
22. Global Recycled Standard
23. Recycled Claim Standard
24. Recycled Content Standard

FIBRE STANDARD SELECTION AND REVIEW PROCEDURE

- Global Standard maintains a dynamic policy for recognition and listing of fibre / feedstock standards that shall be acceptable for GRTS using the criteria detailed above.
- The list of acceptable fibre / feedstock standards can be enhanced following a formal application by standard bodies followed by an evaluation by Global Standard gGmbH.
- This application procedure is made available on the Global Standard GRTS website.
- Global Standard encourages applications from voluntary 3rd party certification standards who believe that they satisfy the key requirements of fibre selection criteria.
- Evaluation processes and results shall be made available transparently, while decisions of Global Standard gGmbH shall remain final in this regard.

GRTS Section 2.2

Certification and Auditing

GRTS SECTION 2.2.1

2.1.2 GRTS Certification is required from the acceptance of raw fibres and throughout the entire manufacturing, processing, and trading of GRTS Goods.

INTERPRETATION

- The first processing stages for responsible fibres shall be:
  a. Ginning for cotton
  b. Retting for bast fibres; Scutching if retting is done as part of agriculture.
  c. Boiling and washing cocoons for silk
  d. Spinning for synthetic fibres
  e. Spinning for manmade cellulosic fibres
  f. Scouring for wools and other animal fibres

GRTS SECTION 2.2.3[2]

"Certification shall be conducted by an Approved Certification Body based on an annual on-site 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 GRTS Goods can be summarised as follows:
  a. Processors and manufacturers of GRTS Goods:
  Certification based on an annual on-site inspection is obligatory.
  b. Subcontractors (in the field of processing and manufacturing) of GRTS Goods:
  Certification based on on-site inspection is obligatory.
  c. Traders (B2B) of GRTS 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 Certification Bodies that have contracted more than 10 GRTS 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 GRTS 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 Certification Bodies
  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 GRTS
  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

2The interpretation of this section is identical to that of GOTS Section 2.2.2

implemented and

h. Verification that corrective actions have been taken.

- The on-site inspection protocol with regard to GRTS 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

- Considering seasonal business and related specific challenges and high-risk situations for compliance with the Human Rights and Social Criteria in the ginning sector, GRTS 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 Global Standard Quality Assurance. They shall ensure that GRTS 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

- World Economic Outlook reports

GRTS SECTION 2.2.6.2

"Exemptions related to the certification of Traders, the annual on-site inspection cycle, and small-scale Subcontractors with low-risk potential are defined in the Manual for the Implementation of GRTS"

GUIDANCE

Small scale subcontractors with a low-risk:

- Possible exemptions from the annual onsite inspection cycle under the provision for 'small-scale subcontractors with a low-risk potential' are provided in the following sections
- On-site visits shall, however, take place at least every third year. Every 3rd year 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.
- Based on the details listed below, Approved Certification Bodies may decide on an exemption from the annual onsite inspection cycle for facilities:
  a. Which employ a total number of up to 10 (≤10) production workers and/or performing job work for a certified entity such as home-based working units and mechanical processing and manufacturing facilities in developed countries.
  b. Operators employing up to 10 (≤10) production workers should be considered as 'small-scale' in this context.
  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 Certification Bodies shall document the risk assessment on which the decision to make use of exceptional rule is based on.

Traders

- Certification based on annual onsite audit is obligatory if at least one of the following conditions are valid for the Trader:
  a. they become proprietors of GRTS 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 GRTS Goods.
  c. they are engaged with labelling or re-labelling** of GRTS Goods.
- Possible exemptions from the annual onsite inspection cycle to a respective remote audit and inspection. This exemption may only be carried out for traders which do not have or subcontract any processing or manufacturing activities. Approved Certification body shall ensure to cover all applicable aspects of the below minimum inspections protocol without being on-site.
- Remote audits and inspection may be considered for home-based trader offices provided that the entity deals only with final products and complies with the definition of "trader" in GRTS Section 7.0 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.

Remote Audits Modalities:

- Remote audit is an audit in which all or part of the audit activities (i.e., "partial remote audit" and "full remote audit") are performed without the auditor being physically present at the auditee's site, using communication technologies to obtain and verify objective evidence necessary to determine conformity with the applicable certification requirements.
- Remote audit approach shall be sufficient for the collection of sufficient and appropriate evidence, maintains impartiality, and remains consistent with the audit programme and the requirements of the relevant certification scheme.
- Remote audit methods may be used alone or in combination with on-site activities.
- Where there is an auditor onsite along with a remote supervisory auditor to conduct remote audits is referred to as a hybrid method, as there is an auditor on the side providing audit information to the main auditor.
- Remote audits or inspection technologies may be classified as in the following, these methods may be combined or used alone for a remote audit:
  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.

Registration of Traders

- This derogation applies to the category of traders described below and grants them an exemption from full GRTS certification. Instead, they are required to undergo a registration process with an Approved Certification Body.
- A derogation from certification applies to traders whose annual turnover from GRTS Goods is below €20,000. Traders meeting this threshold are not obliged to obtain GRTS certification.
- Eligible traders shall register with an Approved Certification Body in accordance with the procedures established in the guidance document "Implementation Guidance for Registration of Traders", accessible on the Global Standard website.
- Registered Traders shall provide their Certification Body with documentation verifying the certified status of their suppliers and the correct labelling of the GRTS Goods including the supplier's Certification number and the reference to the supplier's Certification Body.
- When a trader's annual turnover from GRTS Goods surpasses €20,000, the trader shall promptly notify the Approved Certification Body and transition to full GRTS certification, as the registration status no longer applies.
- Registered Traders may engage in the trade of finished and intermediate GRTS Goods; however, they shall not trade raw, seed, or 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 GRTS Goods with an annual turnover of at least 20.000 €.
  b) They are engaged with packaging or re-packaging* of GRTS Goods.
  c) They are engaged with labelling or re-labelling** of GRTS 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 GRTS Goods is the removing of any GRTS Signs from any certified intermediate / finished products and/or attaching any GRTS Signs onto certified intermediate/finished products for any reason.*

GRTS SECTION 2.2.8

"Certification authorisation granted to Certification Bodies by Global Standard gGmbH shall be based on the accreditation of the Certification Body in accordance with the Approval Procedure and Requirements for Certification Bodies. Such accreditation shall be granted by a recognised Accreditation Body.

Note: IOAS Inc. serves as the main cooperation partner of Global Standard gGmbH in support of this accreditation process. Accreditation by other recognised Accreditation Bodies remains acceptable, provided the applicable approval procedures and requirements are fulfilled."

INTERPRETATION

- A general precondition for accepting an application as a GRTS Approved Certification Body 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 GRTS scope are considered as 'recognised accreditation bodies'.

FURTHER GUIDANCE

- For risk assessment in textile supply chains, Approved Certification Bodies 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

GRTS 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 Global Standard website. Approved Certification Bodies are responsible for issuing SCs for Certified Entities, with corresponding information such as product categories that Certified Entities can offer in compliance with GRTS as well as processing steps and activities that are qualified for GOTS certification. The entire list of GRTS Certified Entities is accessible on the Global Standard website.

REFERENCE

- www.global-standard.org

GRTS 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 Global Standard website.
- TCs shall be requested by a Certified Entity through their chosen Approved Certification Body whenever necessary.
- An uncertified retailer may request TCs from its GRTS certified suppliers to ensure that the whole volume of shipment purchased is indeed GRTS certified. TC shall be issued by the Approved Certification Body of the supplier.
- TCs can be issued to a (un)certified retailer as long as the products carry GRTS Signs.

REFERENCE

- www.global-standard.org

GRTS Section 2.5

GRTS SECTIONS 2.5.3 AND 2.5.4

"2.5.3 Certified Entities purchasing responsible fibres shall receive and maintain scope certificates and transaction certificates (if applicable) from the originating producer, issued by a recognised Certification Body and certified in accordance with the criteria of Section ***Error! Reference source not found.*** *for the whole quantity purchased."*

"2.5.4 Certified Entities purchasing GRTS Goods (intermediate and finished) shall receive and maintain GRTS Scope and Transaction Certificates, issued by an Approved Certification Body for the whole quantity of GRTS Goods purchased, in accordance with the Policy for the Issuance of GRTS Scope Certificates and the Policy for the Issuance of GRTS Transaction Certificates."

INTERPRETATION

- Transaction Certificates (TCs) for responsible fibres should reflect the interpretation and clarifications as provided for GOTS Section 2.1 in this document. TCs for GRTS Goods issued on the basis of a production standard or another processing standard cannot be accepted in the GRTS supply chain.
- Detailed mandatory instructions regarding policy requirements, layout, format and information for issuing GRTS 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 Global Standard 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 Global Standard."

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.

GRTS Section 2.6[3]

GRTS SECTION 2.6.1.4

"Transportation means, and shipping documents shall be documented"

GUIDANCE

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

GRTS Section 2.7

GRTS SECTIONS 2.7.5

"A reference to the Approved Certification Body"

"The Certification Number of the Certified Entity"

GUIDANCE

- A reference to the Approved Certification Body can be the Certification Body's name, short form and/or its logo.
- The Certification Number of the Certified Entity is the number provided by the Approved Certification Body and stated on the Scope Certificate.
- This number is generated by the Global Trace-Base system of Global Standard.

GRTS SECTION 2.7.6

3 This interpretation is identical to that of GOTS

“For retail goods, any claim, advertisement, or reference to GRTS can only be made if the final product is certified in accordance with GRTS and bears the complete and correct labelling of GRTS.”

GUIDANCE

- In the absence of GRTS 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 GRTS Signs.
- Sellers of GRTS Goods are expected to ensure that they request TCs only for correctly labelled GRTS Goods via their respective Approved Certification Bodies.
- Labelling of GRTS Goods shall follow the latest version of ‘Conditions for the Use of Signs - GRTS’. Labelling of final consumer-ready GRTS Goods to be sold in retail to an end-consumer is mandatory. Consumer-facing final products which are produced according to GRTS criteria but do not carry GRTS Signs cannot be referred to as GRTS Goods.

GRTS SECTION 3

GRTS Section 3.2

“Additional Fibre Materials”

INTERPRETATION

- Conventional cotton which is not certified to any of the fibre standards, regardless of if it is GMO-free allowed by GRTS is not permitted as an additional fibre material at any level.
- Conventionally grown cotton fibre, even if it is non-GMO and/or recycled, is not permitted as additional fibre.
- Table 5.2.3 lists the residue limits for finished GRTS 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 GRTS Good, under GRTS Section 3.2.1 and 3.2.2, shall be (thermo-mechanically or chemically) recycled from pre-or post-consumer waste.
- Fibre purity for recycled content: it is recognised that mechanically recycled natural and synthetic materials may contain unintended fibre traces as contamination. Such contamination may result from inherent limitations in the recycling process. Some trace fibres may not be detectable through standard testing methods, making precise fibre identification and quantification challenging. Unintended contamination shall only be considered for mechanically recycled materials, categorised as "others" in document issuance e.g. Transaction Certificates. However, no intentionally added virgin polyester shall be allowed.

GRTS Section 3.3 Accessories

GRTS SECTION 3.3.2 (A) GENERAL MATERIALS

*“**Examples of materials considered as general accessories include:** 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, decorative lace, inlays, interface, labels (GRTS labels, care labels, heat-transfer labels, and adhesives used for labels), pocket liners, interlinings, seam bindings, sewing threads, shoulder pads, padding for undergarments, trims, zippers, soles in footwear and any other accessories not explicitly listed elsewhere in this section.”*

INTERPRETATION

- The use of decorative accessories on GRTS 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 GRTS 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.
- Decorative Glitter: The use of decorative glitter on GRTS-certified goods is subject to the following restrictions:
  - i. Prohibited Glitter: insoluble and non-biodegradable glitters shall not be used.
  - ii. Permissible Glitter: soluble*, biodegradable**, natural, or inorganic glitters may be used.
  - 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*

GRTS SECTION 3.3.2 (D) – SUPPORTS AND FRAMES

"1. Latex foam used in mattresses shall be made from latex certified according to a program that verifies compliance with sustainable forestry management principles."

INTERPRETATION

- 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.

GRTS SECTION 3.3.2 (C) – FILLINGS, STUFFING

"1. For textile fibre use"

GUIDANCE

- Only Responsible fibres listed in Section 2.1 shall be used, since GRTS does not consider textile fibres as accessories when they are used as filling, stuffing material.

GRTS SECTION 4

GRTS Section 4.1

(Note: The interpretation given in this section is identical to that for GOTS)

GRTS SECTION 4.1.1

GRTS Section 4.1.1.1

"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 GRTS 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 GRTS Chemical Input Criteria, GRTS Environmental Criteria, GRTS Human Rights and Social Criteria, and GRTS 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' 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 (2018), OECD Due Diligence Guidance for Responsible Business Conduct
b. OECD (2018), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector
c. GOTS Due Diligence Handbook for Certified Entities (the current version is available on the Global Standard website), Ref. Section 4.2 Embedding Responsible Business Conduct (Step 1)

GRTS Section 4.1.1.2

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

GUIDANCE

a. The Certified Entity shall scope the risk of harm in its own operations and in its supply chain.

- The Certified Entity shall conduct 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. a risk that may be specific to the products that the Certified Entity makes or sells,
  b. specific factors of the countries of its operation,
  c. factors that may be specific to the Certified Entity's sourcing model,
  d. components of the Certified Entity's business model that may increase the likelihood or scope of risks in its supply chain.
- The Certified Entity shall determine which risks of harm are most significant in its own operations and in its supply chain and prioritises those for action.
- The Certified Entity shall document the scoping exercise.
- The Certified Entity shall consult with stakeholders and experts concerning matters which require additional information.
- The Certified Entity shall review the findings of the scoping assessment on a semi-regular basis.
- The Certified Entity shall continually update the information, feeding into its understanding of the risks of harm and accounts for changing circumstances.

b. The Certified Entity conducts a self-assessment of its own operations.

- The Certified Entity shall perform a self-assessment of its own operations to determine the extent of risks and actual impact.
- The Certified Entity shall follow GOTS Criteria and other existing credible guidance for employers when assessing for risk of harm in its own operations.
- The Certified Entity shall engage with potentially affected stakeholders (workers, trade unions and representative organisations) to identify potential and actual harm in its own operations.
- The Certified Entity shall review its policies and systems to assess the extent to which risks are being prevented or mitigated.
- The Certified Entity shall seek 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.

c. The Certified Entity shall assess suppliers associated with high risk for harm at the site level.

- The Certified Entity shall assess 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:
  a. the country of operation with specific risks,

b. production processes with specific risks (e.g. wet processing is a high risk for hazardous chemicals),
c. 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 shall seek assurances that the prioritised suppliers upstream are being assessed.
- The Certified Entity shall conduct 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 shall assess:
  a. the measures that the supplier has implemented to prevent harm,
  b. the actual harm on the ground and risks of harm,
  c. the extent to which the workers are aware of their rights, in particular about their human and labour rights,
  d. 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.

d. 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 stop existing impacts.

REFERENCES

a. OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct

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

c. GOTS Due Diligence Handbook for Certified Entities (the current version is available on the Global Standard website), Ref. Section 4.3 Identifying and Assessing Adverse Impacts (Step 2)

GRTS Section 4.1.1.3

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

GUIDANCE

e. The Certified Entity shall seek 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 shall establish and implements a plan to prevent or mitigate future harm in its own operations.
- The Certified Entity shall take immediate actions to prevent any immediate and critical danger in the short term.
- The Certified Entity shall seek 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 shall include 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.

f. The Certified Entity shall seek to prevent or mitigate harm in its supply chain.

- The Certified Entity shall develop and implement 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 shall develop and implement a plan to prevent its contribution to harm. Such a plan should include clear timelines.
- The Certified Entity shall develop 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 shall seeks to prevent/mitigate risks through its product development.
- The Certified Entity shall have 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 shall implement 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

a. OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct

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

c. GOTS Due Diligence Handbook for Certified Entities (the current version is available on the Global Standard website), Ref. Section 4.4 Cease, Prevent and Mitigate Adverse Impacts (Step 3)

GRTS Section 4.1.1.4

"The Certified Entity shall track implementation and results"

GUIDANCE

a. 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.

b. 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

a. OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct

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

c. GOTS Due Diligence Handbook for Certified Entities (the current version is available on the Global Standard website), Ref. Section 4.5 Tracking Implementation and Results (Step 4)

GRTS Section 4.1.1.5

"The Certified Entity shall communicate how impacts are addressed"

GUIDANCE

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

- The Certified Entity shall communicate 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 shall communicate 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.

b. Communicate with affected stakeholders (for Human Rights).

- The Certified Entity shall be 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 Certified Entity shall report formally on how these impacts are addressed.
- Communications shall be 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 (2018), OECD Due Diligence Guidance for Responsible Business Conduct

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

c. GOTS Due Diligence Handbook for Certified Entities, (the current version is available on the Global Standard website), Ref Section 4.5 Communicating How Impacts Are Addressed (Step 5)

GRTS Section 4.1.1.6

"The Certified Entity shall enable remediation when appropriate"

GUIDANCE

a. 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 shall establish 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 shall be 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.
- Global Standard encourages Certified Entities:
  a. to consult existing guidance on establishing operational-level grievance mechanisms.
  b. to publish complaints.

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

- The Certified Entity shall engage 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 shall be 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.
- Global Standard encourages Certified Entities:
  a. to consult existing guidance on establishing supply chain grievance mechanisms.
  b. to publish complaints.

c. The Certified Entity shall provide 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 shall engage with affected stakeholders in the determination of the remedy.
- The Certified Entity shall assess the level of satisfaction with the process and the outcome of those who raised the complaints.

REFERENCES

a. OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct
b. OECD (2018), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector

c. GOTS Due Diligence Handbook for Certified Entities, (the current version is available on the Global Standard website), Ref Section 4.7 Provide or Cooperate in Remediation where Appropriate (Step 6)

GRTS 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

a. OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct
b. OECD (2018), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector
c. GOTS Due Diligence Handbook for Certified Entities, (the current version is available on the Global Standard website), Ref Section 4.2.2 Strengthening Management Systems

GOTS SECTION 4.1.7

"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.

GRTS SECTION 4.1.11

"Internal Audit"

GUIDANCE AND INTERPRETATIONS

- The internal audit system shall be appropriate to the size, structure, and complexity of the Certified Entity. It shall cover the full scope of GRTS requirements and the entity's own due diligence policies and procedures.

- The Certified Entity shall develop and maintain documented procedures for their internal audit system. These procedures shall include:
  1. Responsibilities for planning and conducting audits,
  2. Criteria for auditor competence and independence,
  3. Requirements for audit reporting and documentation,
  4. Timelines and responsibilities for implementing and verifying corrective actions.
- The internal audit system shall support preparation for external GOTS certification audits and function as a proactive mechanism to identify and address non-conformities.
- The Certified Entity shall take corrective actions without undue delay following identification of non-conformities. The effectiveness of corrective actions shall be verified through documented follow-up audits or reviews.
- The internal audit process shall include:
  a. Planning and risk assessment: identifying audit priorities based on the nature of operations and potential impacts.
  b. Execution: systematic evaluation of relevant processes, including document review, staff interviews, and site-level verification.
  c. Reporting: documentation of audit findings and identification of non-conformities.
  d. Corrective action and follow-up: establishment of timelines and responsibilities for addressing issues, with verification of effectiveness.
- At a minimum, the internal audit shall assess:
  a. Compliance with all applicable GRTS criteria, including environmental, human rights and social, chemical, governance, and traceability requirements;
  b. Compliance with the Certified Entity's internal procedures and due diligence commitments;
  c. The effectiveness of the due diligence management process as outlined in GRTS Section 4.1 and the Due Diligence Handbook for Certified Entities;
  d. The adequacy of the quality management system in safeguarding the integrity of GRTS Goods;
  e. Where applicable, internal controls and processes relevant to public reporting or sustainability disclosures under Step 5 of the due diligence process
- The audit programme shall define the scope, frequency (at least annually), methodology, and responsibilities. The audit shall be conducted by personnel who:
  a. Have demonstrable knowledge of GRTS requirements and relevant compliance frameworks;
  b. Are functionally independent from the areas they audit;
  c. Have unrestricted access to necessary records, processes, and personnel.
- Certified Entities shall maintain complete audit records for a minimum of five years, including audit reports, non-conformity logs, corrective action records, and management review outcomes. Senior management shall review audit results and take appropriate action.
- A structured corrective action process shall be established. This includes assigning responsibility, defining timelines, verifying implementation, and performing follow-up audits as needed.
- Where available, Certified Entities should refer to guidance published by Global Standard or recognised international standards for audit methodology, risk-based planning, and documentation practices.
- Certified Entities with fewer than 100 employees may implement a simplified internal audit model. Smaller Certified Entities may meet the intent of the internal audit requirement through flexible structures and implementation methods appropriate to their size and operational complexity. This may involve:
  a. Assigning audit responsibilities to existing qualified staff, ensuring functional independence;
  b. Conducting focused audits on higher-risk areas;
- Using external support (e.g. consultants) on a part-time basis if internal capacity is limited.

REFERENCES

- Global Standard gGmbH (2023), GOTS Due Diligence Handbook for Certified Entities. Ref. Sections 4.2.1.15, 4.2.2.8, and 4.5

- Shift (2017), Assurance Guidance on Human Rights Performance and Reporting: an aide-memoire for Internal Auditors
- Shift (2017), UN Guiding Principles Reporting Framework Assurance of Human Rights Performance and Reporting

GRTS SECTION 4.2.2 TEXTILE PROCESSING CRITERIA

GRTS Section 4.2.2.1 Spinning

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

INTERPRETATION

- Paraffin, being directly applied to fibres or yarns during production, shall be treated as a chemical input.

GRTS Section 4.2.2.2 - Sizing and Weaving /Knitting

GUIDANCE

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

GRTS Section 4.2.2.3 - Non-woven Manufacture

"Allowed non-woven manufacturing processing includes only mechanical compaction, webbing and entangling such as hydroentanglement.

GUIDANCE

• Preservatives	✕ PROHIBITED
• Biocidal active Substance(s) that comply with European biocidal products regulation (BPR 528/2012) and are listed on the Union list of BPR for product type PT11 (preservatives for process system), which are exceptionally allowed may be used for hydroentanglement process.	! EXCEPTION

NOTE: Final products must adhere to GrTS chemical residue criteria.

GRTS Section 4.2.2.4 - Bleaching

"Inputs that are oxygen-based only (peroxides, ozone, etc.)"

GUIDANCE

- Only oxygen-based bleaching chemicals can be used. Chlorine-Based Bleaching (e.g., Sodium Hypochlorite, Chlorine Dioxide) is prohibited.

GRTS Section 4.2.2.4 - Boiling, Kiering, Washing

"Washing detergents shall not contain phosphates."

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.

GRTS Section 4.2.2.5 and 4.2.2.6 – Dyeing and Printing

"Dyes with allergenic potential (e.g., some disperse dyes)".

GUIDANCE

- Following disperse dyes are prohibited due to their allerge**nic potential and classification as skin sensitising** (H317) 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 sensitisers (H317). 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 skin sensitising (H317) disperse dyes:

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

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

a. IARC monographs
b. ECHA Restriction reports
c. Annex VI (Harmonized Classification) of the CLP regulation

ADDITIONAL GUIDANCE ON TRANSFER PRINT

- Carriers (transfer papers) shall be classified as accessories. These are typically supplied by independent producers. The producer of the carriers shall provide the necessary verification documents demonstrating compliance with the GRTS accessory requirements.

- Transfer pastes/inks shall be classified as chemical inputs. Producers of transfer pastes/inks shall comply with all requirements applicable to chemical inputs and chemical formulators, and shall apply for and obtain a Letter of Approval (LoA) for the transfer paste they mix or formulate.
- Certified processors (e.g., printers) may purchase ready-made transfer papers and shall request:
  a. a LoA for the transfer paste/printing paste used as the chemical input, and
  b. a compliance document or LoA for the carrier (transfer paper) used as an accessory.
- Note: Since blank carriers (transfer papers) are considered accessories, their producers may voluntarily apply for GOTS approval (i.e., an LoA for accessories) or may provide proof of compliance with Section 3.3 (Accessories).

GRTS Section 4.2.2.8 (a)

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

GUIDANCE

- Machine oils, typically used for machinery maintenance (not directly applied to textiles), shall not be considered chemical inputs for textile processing. However, due to the potential for incidental contact with textiles during processing, only heavy-metal free machine oils shall be used.

GRTS Section 4.3

Note: The interpretations given here follow those for GOTS Section 4.3.

GOTS Section 4.3.1

"Certified Entities shall establish and maintain a written Environmental and Chemical Management Policy that is appropriate to the nature and scale of their operations. This Policy shall include plans for Resource Efficiency (Section 4.3.8), Air Emissions (Section 4.3.9), GHG Emissions (Section 4.3.10), Waste Management (Section 4.3.11). Detailed requirements are set out in Section 4.3.4 and each individual section."

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 as written environmental policy of non-processing entities shall include emission calculation approaches and also include emission reduction targets or plans, for instance, through sustainable purchasing of office equipment.

REFERENCE

- European Green Office Handbook

GRTS 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.

GRTS SECTION 4.3.3

Certified Entities shall document and demonstrate compliance with all applicable environmental permits and approvals, including the required parameters, limits and monitoring frequencies by the regulations"

INTERPRETATION

- If local legal requirements are stricter than GRTS 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.

FURTHER REFERENCE

- OECD Environmental Risk Assessment Toolkit

GRTS Section 4.3.4.1

"Assignment of responsibilities: Identification of personnel responsible for environmental and chemical management tasks."

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.

GRTS Section 4.3.8.1

"4.3.8.1 As part of Environmental and Chemical Management Policy (Section 4.3.1), Certified Entities shall establish and implement documented procedures and measures for resource efficiency, including monitoring, data collection, and continuous improvement for water, energy, and chemical use as outlined in the following."

FURTHER GUIDANCE

- GOTS Monitor Water/ Energy (GOTS WE Tool) is a tool specifically developed to support GRTS 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 GRTS certified facilities during the license validity period. Certified entities can download a copy from the Global Standard website. The current Version 2.0 was released in November 2018. A revised version is not under development.
- 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.

REFERENCE

- The OECD Water Governance Programme, Resource Library

GRTS Section 4.3.9.1:

"4.3.9.1 As part of Environmental and Chemical Management Policy (Section 4.3.1), Certified Entities shall establish and implement documented procedures and measures for air emission management, including identification of air pollutant sources, monitoring, quantification methods, and measures to prevent and reduce emissions. "

GUIDANCE

- Global Standard 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 GRTS 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. Recognized frameworks such as the GHG Protocol and ISO 14064 may serve as guidance for accounting and managing GHG 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.

a. Additional information on GHGs: https://www.epa.gov/ghgemissions

b. Suggested reading: https://ourworldindata.org/co2-and-other-greenhouse-gas-emissions

GRTS Section 4.3.9.4:

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

GUIDANCE

- For a list of fluorinated greenhouse gases refer to Regulation (EU) No 517/2014.
- Alignment with established health standards WHO's Global Air Quality Guidelines (2021)

REFERENCE

- Kyoto Protocol: https://unfccc.int/process-and-meetings/the-kyoto-protocol/what-is-the-kyoto-protocol/kyoto-protocol-targets-for-the-first-commitment-period
- Doha Amendment to the Kyoto Protocol: https://www.europarl.europa.eu/EPRS/EPRS-AaG-559475-Doha-Agreement-Kyoto-Protocol-FINAL.pdf

GOTS SECTION 4.3.12.2

"Certified Entities shall ensure the effective treatment and management of wastewater and sludge before being discharged into the environment."

"Effluent Treatment Plants (ETPs) can have direct discharge (internal, on-site) and/or indirect discharge (external, off-site) options. Discharges may occur through various types and systems."

i. *Direct discharge*
ii. *Indirect discharge with pretreatment (with sludge)*
iii. *Indirect discharge with pretreatment (without sludge)*
iv. *Indirect discharge without pretreatment*
v. *Zero Liquid Discharge (ZLD)*

"For other discharge types other than 'direct discharges', Certified Entities shall follow ZDHC Wastewater Guidelines."

INTERPRETATION

- Sampling locations may vary based on the types of discharge. The ZDHC wastewater guidelines shall be followed for sampling locations and procedures.
    a. Untreated Wastewater ('Raw wastewater') - Wastewater that is collected prior to any treatment.
    b. Discharged wastewater (Effluent) - Treated wastewater that is discharged to the environment, or partially treated or untreated wastewater that is discharged to a Central Effluent Treatment Plant (CETP) for further treatment. (This is not applicable to indirect discharge without pretreatment as well as to Zero Liquid Discharge facilities)
    c. Sludge - The residual solid, semisolid, or slurry material generated as a by-product of wastewater treatment processes, including primary, secondary and tertiary (ZLD) treatments.
- 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.

GRTS Sections 4.3.12.5 and 4.3.12.6:

"The applicable local and national legal requirements for wastewater and sludge shall be fulfilled at a minimum."

"Certified Entity shall follow GRTS 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

a. the contract indicates the parameters and the related limits which shall be respected before discharging the wastewater to the receiving treatment plant.

b. 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.

GRTS Section 4.3.12.9:

"Wastewater analyses and sludge analyses shall be performed periodically at normal operating capacity and the results shall be documented."

GUIDANCE

- In the cases of direct discharge (**4.3.11.7)**, following wastewater parameters and limits shall apply to the treated water.

  a. AOX with a limit of 5 mg/l

  b. *Heavy Metal* residues as per the following table

HEAVY METAL	CAS NO.	LIMIT (µg/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 external ETPs are fully or partially used, all applicable national and local legal wastewater requirements shall not be lower than GRTS limits for discharged wastewater.
- In order to prevent wastewater contamination with Adsorbable Organic Halogens (AOX), GRTS takes a precautionary approach and requires chemical input-level assessment. Compliance with these input limits ensures that the wastewater AOX concentration remains below the 1% threshold specified in Section 4.3.2.4 of the Implementation Manual.

REFERENCE

- ZDHC Wastewater Guidelines

GOTS Section 4.3.12.10:

"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:

$$(\boldsymbol{C} \div \mathbf{1000}) \times (\boldsymbol{V} \times \mathbf{1000}) \div (\boldsymbol{W} \times \mathbf{1000}) = \cdots \; \boldsymbol{g\ COD/kg}$$

Where;

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

V (m^3) 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

a. ISO 6060 Water quality - Determination of the chemical oxygen demand

GRTS Section 4.3.13 TEXTILE WASTE MANAGEMENT

GrTS Section 4.3.13.2:

"The Waste Management Policy shall follow the Waste Hierarchy which prioritises waste management actions in a favourable order."

INTERPRETATION

- The waste hierarchy applies as a priority order in waste prevention and management. It is laid down in the EU waste framework directive (Directive 2008/98/EC).
- The hierarchy is generally depicted in the form of an inverted pyramid with the most preferred options at the upper end and disposal at the bottom as the last-resort solution to managing waste (refer to the references).
- Prevention. Measures, taken before a substance, material or product has become waste, that reduce:
    a. the quantity of waste, including through the reuse of products or the extension of the life span of products.
    b. the adverse impacts of the generated waste on the environment and human health; or
    c. the content of harmful substances in materials and products.
- Preparing for reuse. Checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be reused without any other preprocessing.
- Recycling. Any recovery operation by which waste materials are reprocessed into products, materials or substances, whether for the original or other purposes. It includes the reprocessing of organic material (e.g. composting) but does not include energy recovery and reprocessing into materials that are to be used as fuels or for backfilling operations.
- Other recovery (e.g. energy recovery). Any other operation the principal result of which is waste serving a useful purpose by replacing other materials that would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
- Disposal. Any operation that is not recovery, even where the operation has as a secondary consequence the reclamation of substances or energy (e.g. landfilling, incineration).

REFERENCE

- https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=LEGISSUM:waste_hierarchy
- https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en

GRTS SECTION 4.3.14 Packaging Criteria

GUIDANCE

- Packaging has been identified of having a significant environmental impact and regulatory bodies have introduced measures to assess the use of and promote the reduction of packaging materials.
- To prepare for upcoming regulations, Certified Entities shall keep record of all packaging material information used for products.
- The information shall be recorded by material type (e.g. paper, carton, plastic type) and by mass quantity per product delivery to enable individual reporting.

GRTS SECTION 4.3.14.1 AND 4.3.14.2

GUIDANCE

- Where plastic packaging is used, post-consumer recycled content should be used to the highest technically feasible percentage.
- To comply with Packaging and Packaging Waste Regulation 2025/40 (PPWR) (REF) for the European market a minimum of 35% post-consumer recycled content should be targeted. Note: 35% recycled content becomes mandatory according to PPWR by 2030 and will increase to 65% by 2040.

REFERENCE

Regulation (EU) 2025/40

GRTS Section 4.3.14.2.9

"Paper or cardboard used in primary packaging, such as hangtags, shall be made from recycled fibre (from pre- or post- consumer waste) or certified 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.

GRTS Section 4.3.14.2.11

"Bioplastic packaging made from non-GMO biomass sources may be used if certified or tested be non-toxic, biodegradable and compostable (home or industrial).

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

GRTS SECTION 4.3.14.2.12

"Following applies exclusively to hangers used in the packaging of final GRTS Goods:"

INTERPRETATION

- As there is currently no widespread, globally applicable certification system specifically for recycled plastic hangers, certification is not mandatory at this time to verify the use of recycled plastic (from pre- or post-consumer waste).
- At minimum, a written declaration from the hanger supplier confirming that the hanger is made from 100% recycled materials (pre- or post-consumer waste) shall be accepted as adequate verification.
- GRS or RCS certification shall be accepted as sufficient evidence of recycled content, where available.
- Additional relevant certification schemes or verification documents may be recognised by Global Standard upon submission and review.
- When a hanger is integrated into the final product unit and is intended by design to accompany the product to the consumer, the requirements set out in this section shall apply:
- The requirements for hanger apply to:
  - Manufacturers of final GRTS Goods
  - Repackaging facilities handling final GRTS Goods
  - Any operation where the hanger is included in the transportation or consumer-ready packaging that accompanies the product to the consumer
- The requirements for hanger do not apply to:
  - Intermediate product suppliers (e.g., yarn, fabric)
  - Retailers using hangers solely for in-store display
  - Retailers whose hangers remain in-store and do not accompany the garment home
  - Any hanger that is not part of the packaging prepared by the certified entity for final GRTS Goods

GRTS Section 4.4

Note: The interpretations in this Section are identical to those for GOTS.

GRTS SECTION 4.4.1
GRTS 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 GRTS 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 (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
b. OECD (2018), OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector

- The Certified Entity shall respect and comply with the fundamental labour rights formulated by the International Labour Organization (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 GRTS 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)
P029 - Protocol of 2014 to the Forced Labour Convention, 1930

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.

GRTS 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

GRTS 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)
- **P029** - Protocol of 2014 to the Forced Labour Convention, 1930
- C105 - Abolition of Forced Labour Convention, 1957 (No. 105)
- ILO, Combating Forced Labour, A handbook for Employer and Businesses

a. **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.

b. **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.

c. **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

GRTS 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.

REMEDIATION

- 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)

GRTS 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 Section 4.4.3.3, 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 organisations 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

GRTS 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. 1979 Convention on the Elimination of All Forms of Discrimination against Women, 1249 UNTS 13 (1981)

b. C100 - Equal Remuneration Convention, 1951 (No. 100)

c. C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

d. C190 - Violence and Harassment Convention, 2019 (No. 190)

e. R206 - Violence and Harassment Recommendation, 2019 (No. 206)

GRTS 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)
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

GRTS 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 (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct**
g. OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector (2018), pp. 146-151

GRTS SECTION 4.4.7

GRTS 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 should 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. C187 – Promotional Framework for Occupational Safety and Health Convention, 2006, (No. 187)
g. ILO Guidelines on Occupational Safety and Health Management Systems (ILO-OHS-2001)

GRTS Section 4.4.7.7

"… 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)

GRTS Section 4.4.7.10

"The Certified Entity may additionally use pictograms for the safety signs"

REFERENCES

- ISO 780, ISO 7010

GRTS Section 4.4.7.15

"Where a risk from extreme weather events has been identified, considering the severity and likelihood of such events, the Certified Entity shall develop and implement emergency response plans. These plans shall address events such as extreme heat, floods, and storms, and shall include procedures for stopping work, evacuating workers to safe areas, and ensuring access to immediate medical care where necessary."

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.

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:
  - **a)** eliminate the hazard;
  - **b)** control the risk at source (through the use of engineering controls or organizational measures);
  - **c)** minimize the risk by designing safe work systems (including administrative measures taken for risk control); and
  - **d)** 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 4.4.7.16

"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 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)
- Guidelines on Occupational Safety and Health Management Systems (ILO-OSH 2001)
- ILO Ambient Factors in the Workplace Code of Practice (2001)
- EU-OSHA – Climate Change: Impact on Occupational Safety and Health (OSH) (2023)

GRTS SECTION 4.4.8

GRTS Section 4.4.8.2

"Wages, benefits and special allowances paid for regular working hours of the standard working week without overtime, 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

GRTS Section 4.4.8.9

"The Certified Entity shall use a credible 'Living Wages' estimate for their respective operations, on an annual basis. Furthermore, the Certified Entity shall compare Living Wages data with their remuneration data and calculate the 'Living Wage Gap' for its workers.

GUIDANCE

- Credible estimates are those following methodology provided by International Labour Organization (ILO) or recognised by the Roadmap on Living Wages. Furthermore, the Certified Entity shall compare Living Wages data with their remuneration data and calculate the 'Wage Gap' for its Workers. To ensure current wages are comparable with living wage estimates, Certified Entities will follow leading methodologies for adjusting current wages to be comparable with living wage estimates (at minimum, adjusting for a full-time work week, excluding overtime, including eligible bonuses and in-kind benefits.)
- Collect detailed data on current compensation and analyse this data to identify distinct wage groups and their earnings. Utilise the Salary Matrix from the Roadmap on Living Wages. Living Wage estimates can also be selected through the Salary Matrix.
- Identify the local living wage estimate. If available, use an estimate based on the comprehensive Anker methodology. If not, use one that follows ILO criteria or is recognised by the Roadmap on Living Wages. For example, the Certified Entity may refer to living wage estimates provided by the WageIndicator Foundation.
- For each wage group, calculate the wage gap (the difference between actual wages and the living wage) using the Salary Matrix, and produce a report using the appropriate tool.
- Systematically share the wage gap calculation with workers, ask them how the living wage estimate compares to their experiences, and document their responses.
- Note that in the future, Living Wage estimates may need to factor in the cost of early childcare.
- Systematically share the wage gap calculation with buyers and inquire how long it would take to adjust prices to cover the wage gap. 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
- OECD (2024) Handbook on Due Diligence for Enabling Living Incomes and Living Wages in Agriculture, Garment and Footwear Supply Chains
- WageIndicator, Living Wages for Workers, Employers and Trade Unions
- MIT Living Wage Calculator

GRTS Section 4.4.8.10

"The Certified Entity shall develop a plan to bridge the 'Living Wage Gap' and to 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) authorised to implement the plan).
- A plan should include an annual obligation to reduce the gap until its complete elimination.
- A plan should take into account that living wages are subject to change due to inflation, taxation and statutory deductions.
- A plan shall include measurable and time-bound milestones.
- Ensure that the plan is based on dialogue with a recognised 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.

REFERENCES

- ISEAL's Guiding Framework to Support Companies and Sustainability Systems to Make Credible Living Wage Claims

GRTS 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 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.

a. 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.
b. 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.
c. Overtime means hours worked in excess of normal hours of work.
d. 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)

GRTS 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

GRTS 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."
- The requirements set out in Section 4.4.11 are based on the Dhaka Principles for Migration with Dignity. These principles provide a human rights-based framework for the ethical treatment of migrant workers throughout the migration cycle. The Certified Entity is encouraged to use the Dhaka Principles, particularly Principles 1 and 2 on equal treatment and ethical recruitment respectively, as a reference point when developing policies, assessing recruitment practices and addressing the risk of exploitation and discrimination among migrant workers.

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
d. Institute for Human Rights and Business (IHRB) (2012), Dhaka Principles for Migration with Dignity
e. Institute for Human Rights and Business (IHRB), Leadership Group for Responsible Recruitment, Six Steps to Responsible Recruitment: Implementing the Employer Pays Principle

GRTS 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 Certification Bodies.
- Appropriate access to private homeworking premises shall be arranged by employers for the purposes of inspection and audit.

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
c. **ILO (2021), ILO Report: Working from home from invisibility to decent work (2021)**

GRTS SECTION 4.4.13

GRTS SECTION 4.4.13.5

"The Certified Entity shall establish a functional and effective complaint mechanism in relation to GRTS 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

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 GRTS.

REFERENCES

- SAI's Social Fingerprint®

GRTS Section 4.5

GRTS SECTION 4.5.3

"The Certified Entity shall adhere to the relevant OECD guidelines"

INTERPRETATION

- The Certified Entity shall adhere to the OECD 2021 Anti-Bribery Recommendation; in particular, Anex II The Good Practice Guidance on Internal Controls, Ethics and Compliance.

GRTS SECTION 5

Note: The interpretations in this Section are identical to those for GOTS.

GRTS Section 5.1

GRTS 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:

i. Quality Policy: A formal statement of the organization's commitment to quality.
ii. Objectives: Measurable goals for achieving quality outcomes.
iii. Processes and Procedures: Defined workflows to ensure consistency and compliance.
iv. Roles and Responsibilities: Clear designation of accountability within the organization.
v. Document Control: Management of records to ensure accuracy and accessibility.
vi. Performance Monitoring: Regular evaluation of processes through audits, feedback, and key performance indicators (KPIs).
vii. 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)

GRTS Section 5.2

"Quality Testing Parameters"

GUIDANCE

- Following factors should be considered, where applicable and relevant, to a risk assessment analysis for quality testing:
  i. Type of organic fibres used: pesticides and potential Genetic Modification (GM) varieties are commonly used if the same type of fibre would have been sourced conventional.
  ii. 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
  iii. (Organic) natural fibre claims: non-natural substitutes used (e.g. natural bamboo fibre: rayon made from bamboo; linen and hemp: synthetic imitation fibres)
  iv. Type and amount of approved chemical inputs used for GRTS 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
  v. Separation measures in processing: sources of potential contamination from the parallel conventional processing stages performed in the unit
  vi. Transport and storage conditions of GRTS goods: prohibited substances commonly used in transport and storage of comparable conventional products

Qualitative GMO screening of cotton in the GRTS supply chain:

- ISO 5354 -1 and ISO 5354-2[4] shall be applied for qualitative GMO screening of cotton.
- GMO screening shall only be conducted on unprocessed (raw/greige) cotton, as established by ISO 5354-1/2.
- GMO testing of chemically processed cotton shall not be accepted as valid verification.
- Testing shall be carried out by qualified laboratories accredited in accordance with ISO/IEC 17025.
- Timeline for Applicable Test Methods: will remain the same as GOTS, v 8.0, copied below
  i. Transitional Period:
  Until the entry into force of GOTS Version 8.0 in March 2027, ISO/IWA 32, and ISO 5354-1/2 shall be accepted as valid test methods.
  ii. Mandatory Application:
  As of the entry into force of GOTS Version 8.0 in March 2027, ISO 5354-1 and ISO 5354-2 shall be the mandatory test methods.
  iii. Review of Implementation Timeline:
  Where justified, including considerations related to sector readiness, the implementation timeline may be reviewed and revised.
- Global Standard 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 GRTS, can only be employed following technically supported external verification and subsequent approval by Global Standard.

Suggested Testing Parameters & Matrices

a. Certified Entities and Approved Certification Bodies 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.

4 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.

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 Heavy Metals Organotins APEOs Fungicides GM Starch	Banned Amines Pentachlorophenol Heavy Metals Phthalates (especially printing systems) APEOs Fungicides AOX	Formaldehyde Glyoxal Heavy Metals Chlorinated Phenols APEOs Fungicides

d. It should be abundantly clear that testing of GRTS Goods (for residues) and GRTS approved inputs are squarely within the responsibility and ambit of Certified Entities and Approved Certification Bodies, 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 Chemical Inputs:

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 GRTS Goods, residues & quality

Parameter	Grey Fabric	Printed Fabric	Dyed Fabric	Processed / Undyed Fabric	Metallic Accessories	Other Accessories	Sewing Thread
Allergenic/skin sensitising Disperse Dyes (PES)							✪
AOX	✪	✪	✪	✪			✪
AP/APEO	✪	✪	✪			✪	✪
Lead / Cadmium	✪	✪	✪	✪	✪	✪	✪
Extractable HM	✪	✪	✪	✪	✪	✪	
Nickel Release					✪		
Formaldehyde	✪	✪	✪	✪			
Banned Amines		✪	✪			✪	✪
Chlorophenols	✪			✪			

	Phthalates		✪	✪			✪	
	pH value		✪	✪	✪		✪	
	Colourfastness & Shrinkage		✪	✪	✪		✪	✪

GRTS SECTION 5.2.6

"Any final consumer product, labelled according to GRTS shall comply with the following technical quality parameters."

INTERPRETATION

- The following table provides alternate acceptable test methods to the methods as provided for in GRTS. 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

GUIDANCE

- Wherever possible, GRTS Goods should support decreasing environmental impacts at the use phase. Therefore,
  a. GRTS 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.
  b. It is recommended that sellers of GRTS Goods inform end-users about end-of-life options.

GRTS SECTION 5.2.6

"Fibre Shedding"

GUIDANCE

Monitoring of Fibre Shedding from GRTS Goods:

- Loss of fibre fragments (microfibres) from textiles during the use-phase, particularly during laundering, is widely recognised as a significant environmental concern.
- Although several test methods have been developed for analysing fibre shedding, no universal limit has yet been established.
- GRTS aims to establish a monitoring initiative to generate baseline data and inform potential future limits for the certified goods.
- All GRTS supply chain actors are encouraged to provide data obtained from accredited test methods and laboratories on fibre shedding of GRTS Goods.
- Following test methods can be used:
  a. ISO 4484-1-3
  b. AATCC TM 212
  c. The Microfibre Consortium (TMC) Test Method

- Participating operators shall submit test results and relevant details to GRTS via their Approved Certification Body. Reports should include sample information, fibre composition, fabric structure, test method, measured fibre fragment release.

GRTS SECTIONS 5.2.7 AND 5.2.8

"Limit Values for residues in GRTS Goods"

"Limit Values for residues in Accessories"

INTERPRETATION	
• When conducting residue tests on finished GRTS 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 GRTS Section 5.2.8 only; a. Oeko-Tex® Standard 100, 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. b. Oeko-Tex® Standard 100, Class 2 certificates or an equivalent, are considered adequate proof for additional fibres or accessories used for all other GRTS Goods.	
REFERENCE	
Oeko-Tex® Standard100	

GOTS Section 5.2.7 and 5.2.8

"Pesticides"

INTERPRETATION

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

		APPLICABLE FOR TESTING IN	
NAME OF PESTICIDE	CAS NO	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	✪	✪
Cyhalothrin	91465-08-6	✪	✪
Cyclanilide	113136-77-9	✪	
Cypermethrin	52315-07-8	✪	✪
DDD (op- and pp-)	53-19-0, 72-54-8	✪	✪
DDE (op- and pp-)	3424-82-6, 72-55-9	✪	✪
DDT, o,p-	789-02-6	✪	✪
DDT, p,p-	50-29-3	✪	✪
DEF/ 2,4 Dichlorodiphenyldichloroethane	78-48-8	✪	
Deltamethrin	52918-63-5	✪	✪
Diafenthiuron	80060-09-9	✪	
Diazinon	333-41-5	✪	✪
Dichlofenthion	97-17-6		✪
Dichlorprop	120-36-2	✪	
Dichlorvos	62-73-7	✪	✪
Dicrotophos I	141-66-2	✪	
Dieldrin	60-57-1	✪	✪
Diflubenzuron	35367-38-5		✪
Dimethoate	60-51-5	✪	✪
Dinoseb and salts	88-85-7	✪	
Diuron	330-54-1	✪	
Empenthrin	54406-48-3		✪
Endosulfansulfate	1031-07-8	✪	✪
Endrin	72-20-8	✪	✪
Esfenvalerate	66230-04-4	✪	✪
Ethion	563-12-2	✪	✪
Fenchlorphos	299-84-3	✪	✪
Fenitrothion	122-14-5	✪	✪
Fenthion	55-38-9		✪
Fenpropathrin	39515-41-8	✪	

Fenvalerate	51630-58-1	✪	✪
Fipronil	120068-37-3	✪	
Flumethrin	69770-45-2		✪
Glyphosate	1071-83-6	✪	
Heptachlor	76-44-8		✪
Heptachlor epoxide	1024-57-3		✪
Hexachlorobenzen (HCB)	118-74-1		✪
Hexachlorocyclohexane - a-Lindane	319-84-6		✪
Hexachlorocyclohexane - b-Lindane	319-85-7		✪
Hexachlorocyclohexane - d-Lindane	319-86-8		✪
Imidacloprid	138261-41-3	✪	
Lindane	58-89-9	✪	✪
Lufenuron	103055-07-8	✪	
Malathion	121-75-5	✪	✪
MCPA	94-74-6	✪	
MCPB	94-81-5	✪	
Mecoprop	93-65-2	✪	
Metolachlor	51218-45-2	✪	
Methomyl	16752-77-5	✪	
Mevinphos	7786-34-7	✪	
Methamidophos	10265-92-6	✪	
Methoxychlor	72-43-5	✪	✪
Mirex	2385-85-5	✪	
Monocrotophos	6923-22-4	✪	
Parathion-ethyl	56-38-2	✪	✪
Parathion-methyl	298-00-0	✪	✪
Pendimethalin	40487-42-1	✪	
PCP/ Pentachlorophenol	87-86-5	✪	✪
Permethrin	52645-53-1	✪	✪
Perthane	72-56-0	✪	
Phosmet	732-11-6	✪	
Phoxim / Baythion	14816-18-3	✪	
Pirimiphos-ethyl	23505-41-1	✪	✪
Pirimiphos-methyl	29232-93-7		✪
Profenophos	41198-08-7	✪	
Prometryn	7287-19-6	✪	
Pymetrozine	123312-89-0	✪	
Propetamphos	31218-83-4		✪
Pyrethrum	8003-34-7	✪	✪
Quinalphos	13593-03-8		✪
Quintozine	82-68-8	✪	
Teflubenzuron	83121-18-0	✪	

Thiamethoxam	153719-23-4	✪	
Tetrachlorvinphos	22350-76-1		✪
Toxaphene	8001-35-2	✪	
Telodrin	297-78-9	✪	
Strobane	8001-50-1	✪	
Transfluthrin	118712-89-3		✪
Trifluralin	1582-09-8	✪	
Triflumuron	64628-44-0		✪
Thiodicarb	59669-26-0	✪	
Thidiazuron	51707-55-2	✪	
Tolclofos-methyl	57018-04-9	✪	
Trifloxysulfuron-sodium	199119-58-9	✪	

GRTS SECTIONS 5.2.7 and 5.2.8

"PFAS (Per- and Polyfluoroalkyl Substances)"

GUIDANCE:

Guidance on the Analysis of PFAS:
For the analysis of PFAS, the following stepwise approach can be pursued:

1. Total Fluorine Screening:
   Test methods
   - EN 14582:2016
   - ASTM D7359:2023
   - EN 17813:2023
     Limit criteria: 50 mg/kg (50 ppm).
2. Decision Rule:
   If Total Fluorine ≤ 50 mg/kg → product may be considered compliant.
   If Total Fluorine > 50 mg/kg → targeted PFAS analysis shall be performed.
3. PFAS Analysis:
   Method: EN 17681-1:2025 (LC–MS/MS with alkaline hydrolysis).
   Confirm that all regulated PFAS comply with the specific limit values.

Further Guidance:

- Screening for Total Fluorine can play a supporting role for the identification of potential PFAS use; however, background levels of Fluorine may also occur in materials that have not been intentionally treated with PFAS. Industry data indicate that products manufactured without intentional PFAS application can still exhibit Total Fluorine values in the low-hundreds ppm range, whereas intentional treatments generally result in significantly higher concentrations.
- Current analytical techniques commonly applied by laboratories cannot reliably differentiate between organic and inorganic Fluorine in combusted samples. As a result, reported Total Fluorine values represent the sum of both fractions. Therefore, Total Fluorine results cannot be interpreted as a direct measure of PFAS content, nor should detected fluorine be assumed to originate exclusively from PFAS.
- In line with current regulatory developments and technical expert input, a provisional threshold of 50 ppm Total Fluorine is adopted as an indicator for the absence of intentional PFAS use. The threshold may be reassessed as additional data, validated methodologies, or new regulatory expectations become available.
- This interim approach will remain in effect until a widely accepted and validated method for distinguishing organic Fluorine (including PFAS) from inorganic Fluorine becomes commercially available.
- For the identification and quantification of targeted PFAS, EN 17681-1:2025 shall be followed.

GRTS Section 5.3

"Circularity of GRTS Goods"

GUIDANCE

Guidance to 5.3.1 and 5.3.2

- This section shall apply to entities placing final GRTS Goods into circularity practices such as repair, repurposing, refurbishment, or resale of pre-owned products. Such activities are considered part of the responsibility of the entity placing the certified and labelled product on the market after certain interventions and therefore fall under GRTS certification requirements.

Guidance to 5.3.3

- Only those entities compliance with this section may make reference to GRTS or related claims in the context of circularity practices. This includes communication related to repair, resale, refurbishment, or other circular business models involving GRTS Goods.

Guidance to 5.3.4 and 5.3.5 (General Documentation)

- Documentation should enable certification bodies to assess compliance with Section 5.3. Documentation may include internal procedures, records of circular activities, material and chemical input information, traceability records, and other relevant evidence demonstrating conformity with GRTS requirements.

Guidance to 5.3.5.1 – Circular Design

- Circular design refers to design considerations implemented to support repairability, durability, reuse, or other circular pathways of the product. Documentation may describe relevant design decisions or features without requiring specific performance thresholds.

Guidance to 5.3.5.2 – Material Selection

- Any textile material alterations carried out as part of circular practices (e.g. repair or replacement materials) shall comply with the relevant GRTS sections. Replacement materials do not need to be identical to the original materials but must meet applicable GRTS requirements.
- Use of recycled material content should be considered where it does not compromise durability and where there is assurance that no increase in microplastic or microfibre shedding occurs (in accordance with Section 3.2).

Guidance to 5.3.5.3 – Accessory Selection

- Alterations or replacements of accessory components (e.g. linings, buttons, zippers) carried out during circular processes are subject to the relevant GRTS provisions for accessories.

Guidance to 5.3.5.4 – Chemical Safety

- Chemical inputs used during repair, refurbishment, or other circular processes (e.g. detergents, finishing agents, adhesives) are subject to the chemical requirements of GRTS Section 7, regardless of the stage at which they are applied.

Guidance to 5.3.5.5 – Circular Systems and Infrastructure

- Circular systems may include internal or external infrastructures such as repair services, take-back schemes, reuse, or refurbishment models. The documentation should describe the circular business model applied and identify the systems enabling the circularity of the GRTS Good.

Guidance to 5.3.5.6 – Packaging

- Packaging used in the context of circular practices shall comply with the minimum requirements set out in Section 4.3.14.

Guidance to 5.3.5.7 – Traceability

- Traceability of GRTS Goods placed into circular practices should be maintained using GRTS Transaction Certificates or other established traceability methods that allow linkage to the original certified product.

Guidance to 5.3.5.8 – Product Information

- Product-related information recorded for circular GRTS Goods may include product category, quantities, supply chain geography, and relevant technical information (e.g. LCA or microfibre shedding data), where available.

FURTHER GUIDANCE:

- **Article 5(1) of the ESPR. Article 5(1) of the ESPR lists 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

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.

GRTS SECTION 7

Note: The interpretations in this Section are identical to those for GOTS.

GRTS Section 7.1

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. non-hydrolysable halogens, endocrine disruptors, GMO (derived) material or enzyme, nanoparticles)
  c. SDS does not contain certain ecological or toxicological information required to assess compliance with related GRTS criteria
  d. Tests/methods used to determine certain ecological or toxicological values are not specified or do not correspond to those listed in the GRTS criteria
  e. Spot checking on the accuracy of certain ecological or toxicological information provided on the SDS
  f. Surveillance of impurities
- Certification Bodies who are active in Scope 4 shall make their lists of approved chemical inputs available to all Approved Certification Bodies. The lists are to be taken as an applicable tool for input assessment in the GRTS certification scheme by all Approved Certification Bodies.

- Certification Bodies 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 Certification Body), Certification Bodies 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.
- Basic chemicals (such as salt, alkali, acid, etc.) used do not need to be released on Letters of Approval.

REFERENCES

- How to Get Additives Approved

GRTS SECTION 7.2.1

"Prohibited and restricted substances"

INTERPRETATION

- Most of the chemical inputs listed in this Section as prohibited are banned under GORas they do not meet the hazards and toxicity related requirements in GRTS 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 GRTS 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 Global Standard that certain unintended by-products/ contaminants may be found in chemical inputs arising from the synthesis route/manufacturing complexities of such inputs. GRTS, 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 GRTS 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 GRTS requirements for Chemical Inputs, as detailed in 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 GRTS 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	**Aromatic and/or halogenated solvents**	
	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)	10 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	**Flame Retardants**	
	Tri-o-cresyl phosphate (78-30-8)	Individually 50 mg/kg Sum 100 mg/kg
	Trixylyl phosphate (TXP) (25155-23-1)	
	Trimethyl Phosphate (512-56-1)	
	Tris(2 chloroethyl)phosphate (TCEP) (115-96-8)	
	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 aziridinyl)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-tetrabromophthala te (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) / Polybrobiphenyle (Polybromierte Biphenyle) (PBBs) (59536-65-1)	
	Tetrabromodiphenyl ether (TetraBDE) (40088-47-9)	
	Tribromodiphenyl ethers (TriBDEs) (Multiple)	
	Triethylenephosphoramide (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)	
	Tris(methylphenyl) phosphate 1330-78-5	
	2,3-Dibromopropan-1-ol - (2,3- DBPA) 96-13-9	
	1-Propanol, 2,2-dimethyl-, tribromo deriv. 36483-57-5 1522-92-5	
	Paraffin wax, chlorinated 63449-39-8	
	Paraffin, C10-C13, chlorinated - (SCCP) 85535-84-8	
	Paraffin, C18-C28, chlorinated - (LCCP) 85535-86-0	
	Paraffin, C14-C17, chlorinated - (MCCP) 85535-85-9	
	Alkanes, C14-16, chloro 1372804-76-6	
	Tetradecane, chloro derivs. 198840-65-2	
	α-Hexabromocyclododecane 134237-50-6	
	β-Hexabromocyclododecane 134237-51-7	
	μ-Hexabromocyclododecane 134237-52-8	
	Decabromodiphenylethane (DBDPE) 84852-53-9	
	2-Bromodiphenyl ether 7025-06-1	
	4-Bromodiphenyl ether 101-55-3	
	Tribromodiphenyl ether - (TriBDE) 49690-94-0	
	Heptabromodiphenyl ether - (HeptaBDE) 68928-80-3	
3	**Chlorinated Benzenes and Toluenes**	
	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
4	**Chlorophenols (including their salts and esters)**	
	Tetrachlorophenols (TeCP)	Sum: 20 mg/kg
	Pentachlorophenol (PCP)	
	Monochlorophenol and isomers Dichlorophenol and isomers Trichlorophenols and isomers	Sum: 50 mg/kg
5	**Complexing agents, surfactants and wetting agents**	
	Nonylphenol (NP), mixed isomers, Multiple 104-40-5, 11066-49-2, 25154-52-3, 84852-15-3	50 mg/kg
	Octylphenol (OP), mixed isomers, Multiple 140-66-9, 1806-26-4, 27193-28-8	50 mg/kg
	Octylphenol ethoxylates (OPEO), Multiple 9002-93-1, 9036-19-5, 68987-9-06	250 mg/kg
	&Nonylphenol ethoxylates (NPEO), Multiple 9016-45-9, 26027-38-3, 37205-87-1, 68412-54-4, 127087-87-0	250 mg/kg
	Sum of all	250 mg/kg
	EDTA (Ethylenediaminetetraacetic acid), Multiple DTPA (Diethylenetriaminepentaacetic acid), Multiple NTA (Nitrilotriacetic acid)	500 mg/kg
	LAS (Linear Alkylbenzene Sulfonates) α-MES (Alpha- Methyl Ester Sulfonate)	500 mg/kg
6	**Endocrine disruptors**	**X PROHIBITED**
7	**Formaldehyde and other short-chain aldehydes (such as Glyoxal)**	150 mg/kg
8	**Glycol derivatives**	
	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
9	**Genetically Modified Organisms (GMOs)**	
10	**Heavy Metals**	Refer to the definition of “Heavy Metal Free” in Section 7 of GOTS

11	**Aromatic Amines and Aniline (free)** **Inputs (e.g. azo dyes and pigments) releasing arylamines with carcinogenic properties (MAK III, category 1,2,3) and Aniline, free, (category 4)**	
	Banned Amines / Cleavable carcinogenic arylamines	Sum 150 mg/kg
	Aniline (free), ISO 14362, without reductive step	150 mg/kg
	Aniline (free), for indigo colourants only	2000 mg/kg
	Note: For indigo colourants, an exceptional specification for free aniline applies: • Testing method: Determination of free aniline shall be performed with a reductive step to ensure complete solubilisation of indigo (including the leuco-form) and full release of extractable aniline. • ISO 14362, with reductive step, shall be followed. • Result normalisation: Test results shall be normalised to 100% indigo content in the sample to account for dilution effects.	
	Navy Blue Colourant, (Index-Nr. 611-070-00-2; EG-Nr. 405-665-4)	250 mg/kg
	Carcinogenic or Allergenic (Disperse) Dyes	250 mg/kg
12	**Inputs containing functional nanoparticles (= particles with a size < 100 nm)**	
13	**Non-hydrolysable Halogens**	
	a. Inputs that contain > 1% non-hydrolysable, permanent, halogens	**PROHIBITED**
	b. Specific exceptions for certain pigments apply see section (4.2.6.6 and 4.2.6.7)	**RESTRICTED**
	c. AOX (Adsorbable Organic Halogens) Note: The most effective upstream measure to reduce AOX in wastewater is the elimination of non-hydrolysable halogens at the formulation level. AOX testing of wastewater is required as a downstream control parameter to verify compliance and to ensure that substitution measures result in measurable environmental benefits.	For AOX limits, see Implementation Manual, Section 4.3.11 for Wastewater and Sludge Discharge Requirements
14	**Organotin Compounds**	
	Dibutyltin (DBT) (Multiple)	20 mg/kg
	Mono, di and tri derivatives of methyltin (Multiple)	5 mg/kg
	Mono, other di and tri derivatives of butylin (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
15	**Plasticizers / Phthalates**	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_{7-11} branched and linear alkylphthalates (DHNUP) (68515-42-4)	
	Di-C_{6-8} branched alkylphthalates (DIHP) (71888-89-6)	
	Di-iso-pentyl phthalate (DIPP) (605-50-5)	
	Di-n-pentyl phthalate (DnPP) (131-18-0)	
16	**Plasticizers / PAH**	Sum: 200 mg/kg
	Benzo[a]pyrene (BaP) (50-32-8)	20 mg/kg
	Anthracene (120-12-7)	

	Pyrene (129-00-0)	Sum: 200 mg/kg
	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)	
	Acenaphthene (83-32-9)	
	Phenanthrene 85-01-8)	
	Fluorene (86-73-7)	
	Naphthalene (91-20-3)	
17	**Per- and polyfluoroalkyl substances (PFAS)**	
	Perfluorooctanoic acid (PFOA) and related substances	2 mg/kg
	PFAS (Poly- and perfluoroalkyl substances)	50 mg/kg
	Perfluoroisobutylene	0.1 mg/kg
	Reaction mass of 2,2,3,3,5,5,6,6-octafluoro-4-(1,1,1,2,3,3,3-heptafluoropropan-2-yl)morpholine and 2,2,3,3,5,5,6,6-octafluoro-4-(heptafluoropropyl)morpholine	100 µg/kg
	Perfluorobutane sulfonic acid and its derivatives	1mg/kg
	Perfluorobutane sulfonic acid and its salts	
	Perfluorobutane sulfonic acid	
	Perfluorobutane sulfonates	
	Perfluorobutane sulfon amides	50 mg/kg
	Perfluorobutane sulfon amido ethanols	15 mg/kg
	Perfluorobutane sulfon amidoethyl (meth)acrylates	15 mg/kg
	Perfluorobutane sulfon halides	15 mg/kg
	Perfluorobutane sulfon polymers	15 mg/kg
	Perfluorohexane sulfonic acid and its derivatives	
	Perfluorohexane sulfonic acid and its salts	20 µg/kg
	Perfluorohexane sulfon amides	20 µg/kg
	Perfluorohexane sulfon amidoethanols	20 µg/kg
	Perfluorohexane sulfon amidoethyl (meth)acrylates	20 µg/kg
	Perfluorohexane sulfon halides	20 µg/kg
	Perfluorohexane sulfon polymers	20 µg/kg
	Perfluorooctane sulfonic acid and its derivatives (PFOS)	1 µg/kg
	Perfluorooctane sulfonic acid and its salts	
	Perfluorooctane sulfon amides	
	Perfluorooctane sulfon amidoethanols	
	Perfluorooctane sulfon amidoethyl (meth)acrylates	
	Perfluorooctane sulfon halides	
	Perfluorooctane sulfon polymers	
	Perfluoroalkyl sulfonic acid and its derivatives - F(CF2)n [n>8]	
	Perfluoroalkyl sulfonic acid and its salts - F(CF2)n [n>8]	20 µg/kg
	Perfluoroalkyl sulfon amides - F(CF2)n [n>8]	20 µg/kg
	Perfluoroalkyl sulfon amidoethanols - F(CF2)n [n>8]	20 µg/kg
	Perfluoroalkyl sulfon amidoethyl (meth)acrylates - F(CF2)n [n>8]	20 µg/kg
	Perfluoroalkyl sulfon halides - F(CF2)n [n>8]	20 µg/kg
	Perfluoroalkyl sulfon polymers - F(CF2)n [n>8]	20 µg/kg
	Perfluorobutanoic acid and its salts	50 µg/kg
	Perfluorohexanoic acid and its salts	25 µg/kg
	Perfluoroheptanoic acid and its salts	50 µg/kg
	Perfluorooctanoic acid and its salts	25 µg/kg
	Perfluorocarboxylic acids (C9-C14) and its salts	25 µg/kg
	Perfluorobutanoic acid related substances	1000 µg/kg
	Perfluorohexanoic acid related substances	1000 µg/kg
	Perfluorooctanoic acid related substances	1000 µg/kg
	Perfluorooctylethyl olefins	
	Perfluorooctylethene	
	Heptadecafluoro-1-iodooctane	
	1H,1H,2H,2H-Perfluorodecyliodide	
	Pentadecafluorooctyl fluoride	

	Perfluorocarboxylic acid (C9-C14) related substances	260 µg/kg
	Perfluoroalkyl compounds, branched	
	2,3,3,3-tetrafluoro-2- (heptafluoropropoxy)propionic acid, its salts and its acyl halides	0.05 mg/kg
18	**Quaternary ammonium compounds**	
19	**Chlorinated Paraffins**	
	Short Chain Chlorinated Paraffins (SCCP) (C10 C13)	250 mg/kg
	Medium-Chain Chlorinated Paraffins (MCCPs) (C14-17)	250 mg/kg

Table 1: Prohibited and Restricted Chemicals

GRTS Section 7.2.1.3 (6)

"Endocrine Disruptors"

GUIDANCE

Assessment of Endocrine Disruptors (EDs):

- Chemical inputs shall be evaluated for endocrine-disrupting (ED) properties in accordance with the harmonised classifications listed in CLP Annex VI of the EU Classification, Labelling and Packaging (CLP) Regulation (EC) No 1272/2008. These harmonised ED classifications will be incorporated into Annex VI and become legally binding as of 11 June 2026, ensuring that all assessments are consistent, legally compliant, and based on scientifically recognised criteria.
- This list shall be used universally for the evaluation of all GOTS-approved chemicals.

REFERENCES

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008R1272

GRTS Section 7.2.1.3 (9)

"Genetically modified organisms (GMOs)"

GUIDANCE

- For substances certified under bio-based programs or similar, it shall be verified that the certification program provides verifiable evidence of non-GMO status.
- Where such certification programs do not include GMO verification, additional documentation or testing shall be provided to demonstrate compliance with non-GMO requirements.

GRTS Section 7.2.1.3 (12)

"Aromatic Amines and Aniline (free)"

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)	

- **Azo dye compounds MAK III, category 2 (with CAS no):**

o-Aminoazotoluene (97-56-3)	4,4'-Methylene-bis-(2-chloroaniline) (101-14-4)
2-Amino-4-nitrotoluene (99-55-8)	4,4'-Oxydianiline (101-80-4)
p-Chloroaniline (106-47-8)	4,4'-Thiodianiline (139-65-1)
2,4-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)		

- **Azo dye compounds MAK III, category 3 (with CAS no):**

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

- **Azo dye compounds MAK III, category 4 (with CAS no):**
  Aniline (62-53-3)
- **Prohibited azo pigments that may release carcinogenic amine compounds** (*or generate the same in a chemical follow-up reaction) **include:**

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

GRTS Section 7.2.1.3 (14)

"Non-Hydrolysable Halogens"

INTERPRETATION

- Inputs with a total content of organic halogens >1% can only be approved if it is plausible that the **non-hydrolysable (**permanent) **halogens** is < 1%.
- Chlorine, bromine, iodine shall be taken into consideration for the assessment for the "non-hydrolysable halogens". For the definition of "non-hydrolysable halogens" please refer to Section 7 of GOTS.

GRTS Section 7.2.1.3 (17)

"Per- and polyfluoroalkyl substances (PFAS)"

INTERPRETATION

- Definition: Any substance that contains at least one fully fluorinated methyl (CF3-) or methylene (-CF2-) carbon atom (without any H/Cl/Br/I attached to it).

REFERENCES

- **ECHA PFAS Restriction Proposal,** p4.

GRTS Section 4.2.1.3 (19)

"Medium-chain chlorinated paraffins (MCCPs C_{14}-C_{17})"

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_{14} to C_{17}.

GRTS Section 7.2.1.3 (23)

"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 GRTS prior to the input approval, the Certification Body shall notify Global Standard 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 7.2.1.3 (24)

"Quinoline"

INTERPRETATION

- Contamination Detection Limit : < 1000 mg/Kg

GOTS SECTION 7.2.2.1 (A)

"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 GRTS 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 GRTS 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 Certification Bodies 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:
   - Directive 2006/8/EC
   - Classification & Labelling Inventory for substances registered or notified in the EU
   - Table of harmonised entries in Annex VI to CLP, Adaptation to Technical Progress (ATP).

GRTS Section 7.2.2.2

Footnotes

"Performing new animal tests to determine LD_{50} values in the course of the assessment procedures for inputs is prohibited."

"Performing new fish and daphnia tests to determine unknown LC_{50} / EC_{50} values in the course of the chemical input 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 GRTS.

GRTS Section 7.2.3.2

"Compliance with sections 7.2.3.7, 7.2.3.12 and 7.2.3.14 shall be verified during these onsite audits. "

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 Approved Certification Body to verify full compliance with this section.

REFERENCES

a. Eco Passport by Oeko-Tex®
b. bluesign®
c. BluWin

GRTS SECTION 7.2.3.7

"Product Stewardship"

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:
  d. Risk assessment of raw materials and intermediates for consistency and presence of hazardous substances.
  e. Testing plan for raw materials with defined intervals, test methods and approval criteria.
  f. Risk assessment of preparations for consistency and presence of unavoidable contaminants.
  g. Testing plan for formulations and preparations with defined intervals and approval criteria.
  h. Process control during formulation for consistent quality and hazardous substances.
  i. Quality assurance practices in formulation of preparations.
  j. Staff training for risk assessment.
  k. Adequate evaluation of preparations for the release of hazardous substances during intended use.
  l. Application of formulations and preparation on textile substrate under controlled conditions set by formulators, verifying conformance with GRTS 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 Approved Certification Body to verify full compliance with this section.

GRTS Section 7.2.3.12

"Chemical Formulators and Chemical Subcontractors, where applicable, shall follow the requirements set in sections 4.3.1 - 4.3.7."

GUIDANCE

- 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 more stringent.