CERTIFICATION AND OPERATING PARAMETERS FOR GOTS CERTIFIED GINS

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1 INTRODUCTION

Due to the recent rise in demand for organic cotton brought on by the scarcity of organic raw materials and fraud discovered at the farm level, it has become more challenging for producers, traders, and manufacturers to maintain a balance between supply and demand.

GOTS believes that there is a significant risk of fraud due to the demand-supply gap and consequent commercial benefits of the organic cotton trade. Over the past years, GOTS has worked on ensuring that fraud is eliminated/minimised and continues to create new requirements that take this cautious approach forward.

The first processing step for GOTS is ginning. It is essential for GOTS that the material entering the supply chain is authentic and can be traced back to its source (farm). Furthermore, to ensure and overcome the potential fraud that might happen at the most crucial stage of the supply chain, GOTS has decided to create a document detailing some certification and operating parameters for the gins.

2 CERTIFICATION AND OPERATING PARAMETERS FOR GINS

2.1 Gins are the first processing step for cotton in the GOTS Supply chain.

2.2 GOTS requires that all gins are independently certified to the Standard.

2.3 A gin shall not be permitted as a non-certified subcontractor to any other certified entity such as traders of lint cotton.

2.4 A gin however shall be permitted to operate as an independently certified subcontractor to other certified entities.

2.5 The gin shall purchase raw cotton directly from Farm Groups / Farms. Gins shall not purchase raw cotton from traders of raw cotton. This provision shall not apply if the gin acts as an independently certified subcontractor.

2.6 The distance between the certified gins and the Farm Groups / Farms where they receive raw cotton shall not be more than 500 km.

2.7 GOTS Approved Certification Bodies (CBs) shall be expected to be aware of local regulations regarding intra-state / intra-region transport of raw cotton and apply this knowledge to the gins they certify and verify the same as for the Transaction Certificates (TCs) they issue.

2.8 All Farm Groups / Farms whose certified organic raw material is to be accepted into the GOTS system shall need to be mandatorily pre-registered on the GOTS farm-gin registry.

2.9 Farm Groups / Farms may supply raw cotton to multiple GOTS gins.

2.10 On each farm transaction certificate (TC) for raw cotton, a list of farms from where it is sourced and information about the harvest period shall need to be included.

2.11 Farm Transaction Certificates shall be used only for one year from issuance. Material that is being presented to the GOTS system beyond this date shall not be accepted within the GOTS system.

2.12 Mandatory GMO test reports shall mention the lot numbers of tested raw cotton and related farm TC numbers.

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1 In exceptional cases, exemptions may be permitted by GOTS on specific request.
2 An example of such regulations is the issuance of E-way bills in India
3 GOTS allows certified organic or organic in-conversion material that are certified to standards belonging to IFOAM Family of Standards only.
4 GOTS Farm-Gin registry is being developed at this time. This may have additional requirements for registration, such as time-limits, upload of Farm Scope Certificates etc.
2.13 Sampling of raw cotton for such GMO testing shall follow the methods specified in the latest version of the document “Advisory to CBs - sampling protocol for GMO testing”\(^5\).

2.14 CBs shall verify and maintain records of incoming commercial documents and records of official transaction receipts and transport documents. In cases where there is a high risk, financial transactions and taxation documents\(^6\) (where applicable) should also be verified. Financial transactions shall be through legal and authentic banking channels rather than cash.

2.15 CBs shall ensure they assess the throughput capability of the gins that are being certified and verify these at the time of annual audits and issuance of TCs. For example, machine capacity and loss percentage shall be part of the review of TC applications from the gin and verified during annual/unannounced audits.

2.16 Whenever a lint cotton transaction certificate is issued to a trader who has used an independently certified gin the CB shall share this information with the CB who has certified that gin.

2.17 GOTS recommends that unannounced audits of Gins be conducted by CBs where there is a high perception of risk. GOTS shall retain the right to accompany the CB for such unannounced audits as observers.

2.18 CBs shall review and scrutinise all immediate past-issued TCs should a certified gin request voluntary and premature withdrawal from certification.

2.19 In the event of certified gins voluntarily choosing to move to another CB post expiry of their Scope Certificate, both concerned CBs shall cooperate and proactively verify details about closing stock before recertification takes place. Gins shall be permitted to migrate to another CB only after three years of continuous certification.

3 IMPLEMENTATION

3.1 These requirements shall be implemented at the earliest opportunity for the 2022 cotton harvest and certainly before 1 December 2022.

3.2 There will be no extension available for these requirements.

4 CONTACT

For questions or clarifications about this document, please contact Prachi Gupta (prachi@global-standard.org).

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IMPORTANT:
The following verbal forms are used to indicate requirements, recommendations, permissions and capabilities in this and other GOTS documents:

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

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\(^5\) This advisory includes sampling protocols of materials other than raw cotton as well.

\(^6\) In India, for example, verification of records of Goods and Services Tax (GST) can be appropriate.