CHANGE LOG

MANUAL FOR THE IMPLEMENTATION OF GOTS V 7.0

REVISION DRAFT 1.0

RELEVANT CHANGES THAT HAVE BEEN MADE IN THE GOTS IMPLEMENTATION MANUAL ARE LISTED IN THIS DOCUMENT FOR PUBLIC CONSULTATION PROCESS AS A PART OF STANDARD REVISION PROCEDURE FROM VERSION 6.0 TO 7.0

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| GOTS IMPLEMENTATION MANUAL (GOTS IM) | 1.2. | • New Guidance concerning the implementation of the Due Diligence Management Systems is added, inter alia, it provides a definition of the due diligence process, refers to the relevant OECD Guidance and Guidelines.  
• It is also provided that the management systems shall allow to identify, prevent, mitigate and account for how it addresses its actual and potential adverse impacts.  
• Further guidance and references are provided to ensure the implementation of the due diligence management systems in line with the internationally recognized best practices and standards.  
• Text is edited for clarity and consistency |
| GOTS IM | 1.3. | • Section title is changed to "Scope Certificate" from "Certificate of Compliance"  
• Interpretation is updated to align with the current policy of scope certificate "Policy for the Issuance of Scope Certificates v 3.0" |
| GOTS IM | 1.4. | • New guidance is included "TCs shall be requested by Certified Entity through concerned Approved Certifier whenever needed.  
• Further guidance is included: An uncertified retailer may request TCs from its GOTS certified suppliers to ensure that the whole volume of shipment purchased is indeed GOTS certified. TC shall be issued by the Approved Certifier of the supplier. TCs can be issued to a (un)certified retailer as long as the products carry GOTS Signs."

| GOTS IM | 1.5. | • New guidance is included:  
"A reference to the Approved Certifier can be the certifier's name, short form and/or its logo  
The license number of the Certified Entity is the number provided by the Approved Certifier and stated on the Scope Certificate"  
"Labelling of final consumer-ready GOTS Goods to be sold in retail, to an end-consumer, is mandatory. Consumer-facing final products which are produced according to GOTS criteria but do not carry GOTS Signs cannot be referred to as GOTS Goods. An (un)certified retailer can receive Transaction Certificates from their certified supplier only for those products which carry GOTS Signs. Sellers of GOTS Goods are expected to ensure that they request TCs only for correctly labelled GOTS Goods via their respective Approved Certifiers. Labelling of GOTS Goods shall follow the latest version of 'Conditions for the Use of GOTS Signs" |
| GOTS IM | 2.2.1 & 2.2.2 | • The term "normal conditions" is altered with the term "standard conditions". |
| GOTS IM 2.3.1 | • Clarification is included as "Recombinant DNA (DNA cloning, sequencing, editing, engineering) are considered as genetic modification, therefore, inputs produced by such methods are prohibited."
  
  • New substance groups and relevant contamination levels are included under "Aromatic and/or Halogenated Solvents": "NMP (872-50-4)"
    "Dimethylformamide (DMF) (68-12-2), 50 mg/kg",
    "Dimethyacetamide (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"
  
  • New substance groups and relevant contamination levels are included under "Flame Retardants":
    "Tri-o-cresyl phosphate (78-30-8), 50mg/kg",
    "Trixylyl phosphate (TXP) (25155-23-1), 50 mg/kg",
    "Trimethyl Phosphate (512-56-1), 50 mg/kg"
  
  • New substance groups and relevant contamination levels are included under "Chlorinated Benzenes and Toluuenes" as "All isomers of tri-, tetra- chlorotoluuenes, 10 mg/kg"
  
  • Contamination level, 5mg/kg is included for each of "Mono, di and tri derivatives of octyltin (Multiple)",
    "Monomethyltin compounds (MMT) (Multiple)",
    "Dipropyltin compounds (DPT) (Multiple)",
    "Dibutyltin dichloride (DBTC) (Multiple)",
    "Tripropyltin compounds (TPT) (Multiple)",
    "Tetraethyltin compounds (TeET) (Multiple)",
    "Tetraphenyltin compounds (TeBT) (Multiple)",
    "Tetraoctyltin compounds (TeOT) (Multiple)",
  
  • The term "Per- and Polyfluorinated Compounds (PFC)" is changed to "Per- and Poly fluoroalkyl Substances (PFAS)" for accuracy
  
  • Under "Chlorinated Paraffins" category, a new substance group "Medium Chain Chlorinated Paraffins (MCCPs) (C14-17)" and relevant contamination level "500 mg/kg" are included. Contamination level of "Short Chain Chlorinated Paraffins (SCCP) (C10 C13)" is revised to "50 mg/kg" from "250 mg/kg"
  
  • The title of the box is changed to "Further Guidance for Inputs (e.g. azo dyes and pigments) releasing carcinogenic arylamine compounds (MAK III, category 1,2,3,4)" from "Specification"
  
  • A new guidance table including various examples of carcinogenic dyes is included in "Further Guidance for Carcinogenic Dyes" |
| GOTS IM | 2.3.3 | • Applicable recognised norms or directives are updated to include "Z129.1:2010" and "EC 1907/2006 (REACH)" is replaced by "EC 2020/878"
• Interpretation text is edited for clarity and consistency
• Further clarification and guidance is included as "The validity of an approved chemical input shall be 3 years or until the next version of GOTS comes into force, whichever is earlier. Based on the risk assessment of the Scope 4 auditor, the validity period may be shorter than 3 years. However, the Additives Registration Fee shall be paid once for the validity period of the current Standard version." |
| GOTS IM | 2.3.4 | • Further interpretation is included:
"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 shall implement the following quality assurance practices:
- Risk assessment of raw materials and intermediates for consistency and presence of hazardous substances.
- Testing plan for raw materials with defined intervals, test methods and approval criteria.
- Risk assessment of preparations for consistency and presence of unavoidable contaminants.
- Testing plan for formulations and preparations with defined intervals, and approval criteria.”
- Application of formulations and preparation on textile substrate under controlled conditions set by formulators, verifying conformance with Section 2.4.16."
• Implementation deadline of section 2.3.4, for subcontractors, is included "The requirements in this section shall be implemented at subcontractors’ premises by 01 March 2025.” |
| GOTS IM | 2.3.5 | • A new reference is included "Certificate of ZDHC Level 3 Product Conformance, issued by Sustainable Textile Solutions (STS), an arm of BluWin Limited" for relevant audits
• Implementation deadline of section 2.3.5, at subcontractors, is included “The requirements of this Section for subcontractors (if any) shall be implemented by 01 March 2025. Subcontractor sites are expected to have been first inspected on-site by GOTS Approved Scope 4 auditors by 01 July 2025.” |
| GOTS IM | 2.4.2 | • New interpretation is included "Paraffin is directly applied onto fibres/yarns during production therefore it shall be considered as chemical input.” |
| GOTS IM | 2.4.3 | • New guidance is included "use of PVA (polyvinyl alcohol) as a backing material for embroidery is prohibited." |
| GOTS IM | 2.4.5 | • A new guidance is included for "boiling, kiering, washing" process "washing detergents shall not contain phosphates" as "analysis of the presence of phosphate cannot be obtained via an analysis of phosphorous using ICP/MS or similar. Analysis of phosphate should be a direct and conclusive test. Knowledge of the formulation of the chemical input or an appropriate test method such as Ion Chromatography adapted from ISO 10304-1 can be considered."

| GOTS IM | 2.4.6 & 2.4.7 | • The Table containing sensitizing disperse dyes is updated:
- C.I. Disperse Red 23 is removed
- A new table is created for "carcinogenic dyes" and following dyes are moved to there: "carcinogenic dyes": "C.I. Disperse Orange 11", "C.I. Disperse Yellow 7", "C.I. Disperse Red 151", "C.I. Disperse Yellow 56"

| GOTS IM | 2.4.9 | • A new interpretation section is included for machine oils "As a common practice, machine oils are utilized for the maintenance of textile machinery and not applied to textiles directly. Therefore, they are not to be perceived as a chemical input for textile processing, however, during textile processing, if used, machine oils may come in contact with textiles. Considering the risk involved, wherever relevant, those machine oils shall be heavy-metal free."

| GOTS IM | 2.4.10.1 | New interpretation and guidance information is included:
- "Conventionally grown cotton fibre, even if it is non-GMO or recycled, is not permitted as an additional fibre."
- "However, mechanically recycled organic cotton fiber which comes from GOTS Certified Entities as pre-consumer waste can be mixed with virgin organic and virgin organic in-conversion cotton in a product. This is allowed since mechanical recycling would not intrinsically cause any difference in fibre’s organic status."
- "Virgin polyester is not permitted as an additional fibre material. polyester fibres ....shall be (thermo-mechanically or chemically) recycled from pre- or post-consumer polyester based waste.
- "Animal based fibres which are certified to a standard that includes animal welfare principles are encouraged to be selected as an additional fibre materials."
- "Current adequate proof for a non-mulesed verification of wool by Approved Certifiers shall include:
  o Wool fibre that is coming from a region where mulesing is prohibited or not practised IFOAM Family of Standards accredited organic certification in this region strictly excludes mulesing
  o If any of the above conditions is not fulfilled, then an additional certification is required to provide adequate proof for the non-mulesed status of the wool. Those schemes may include (but are not limited to) Responsible Wool Standard (RWS) by Textile Exchange, ZQ Merino, New Merino etc.
- A reference to "Rainforest Alliance" is included
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| • Text is edited for consistency and clarity purposes  
• The word “lace” is changed to “lace used as decoration” for further clarification  
• Included “soles in footwear” | New guidance, interpretation and reference are included:  
• Certified Entities shall conduct a regular, preferably annual, environmental risk assessment aiming to identify potential environmental impacts and risks that is applicable to their processing/manufacturing and classify and prioritize identified risks.  
• After identifying environmental risks and impacts, Certified Entities shall set measures to mitigate those risks and impacts  
• Certified Entities shall have a chemical management plan at the site level 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.  
• 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 development and implementation of water efficiency plans and/or reducing process dependence on freshwater by re-using and recycling.  
• OECD, EU and other relevant references are included  
Certified Entities identify sources of GHG emissions within their operations these may include activities owned or controlled by the enterprise that release emissions straight to the atmosphere (i.e. direct emissions), or the enterprise’s consumption of purchased electricity, heat, steam and cooling (i.e. energy indirect emissions).  
• Certified Entities are required to reduce identified GHG emissions to the extent possible over time. They may take a risk-based approach to address their GHG emissions by focusing their resources where GHG emissions are greatest (for example fossil fuel based activities). While GOTS currently does not set time or emission limits within its supply chain, it encourages all Certified Entities to evaluate their operations and work towards such goals. A future perspective of Certified Entities should be to extend this evaluation beyond their own operation and also consider GHG emissions released at different levels such as product related emissions and supply chain emissions. |
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| Interpretation and guidance is enhanced to include following criteria:  
  - Maintenance of ETP is especially crucial to eliminate risks such as leakage to the soil and aquifers etc.  
  - AOX and heavy-metal residue limit criteria of the treated wastewater are now obligatory to follow "Treated wastewater shall include following test parameters and limits" |

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| • A new interpretation is included for "recycled plastic hangers":  
  - "there is currently no widespread and globally applicable certification system for recycled plastic hangers, for the time being, a certification is currently not mandatory to prove the use of recycled plastic for hangers (from pre- or post-consumer waste). As a minimum, a ‘declaration’ issued by the producer/trader of the single-use plastic hanger that it is made from 100% recycled materials from pre- or post-consumer waste shall be adequate. Examples of certified recycled material are GRS/RCS Standard. Further relevant certification programs / verification proofs may be recognized as equivalent in the future."  
  - New percentage wise criterion "100%" is included for recycled paper/cardboard "as a minimum ‘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."  
  - New percentage wise criterion "100%" is included for plastic hangers "as a minimum ‘declaration’ issued by the producer/trader of the single use plastic hanger that it is made from 100% recycled materials from pre- or post-consumer waste shall be adequate."  
  - A new reference "Rainforest Alliance" is included as "Recognized certification programs verifying compliance with sustainable forestry management principles are ... and Rainforest Alliance."  
  - Same criteria for packaging made out of textile materials now also apply for strings of hangtags |

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| Interpretation is enhanced to cover following details:  
  - The maximum period that a single Transaction Certificates 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 is included "for the purposes of traceability and operation of the Centralised Database System (under development), information about 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 Scope Certificate(s) of fibre producer(s) / producer group(s) along with quantity of purchased fibre(s)." |
| GOTS IM | 2.4.15 | • Further guidance and criteria is included for user-phase of GOTS Goods. "Wherever possible, GOTS Goods should support decreasing environmental impacts at the use phase. Therefore, GOTS Goods care labels, wherever applicable, shall carry environmentally friendly washing instructions, such as, wash at room temperature, use of liquid detergent, no use of bleach, line or flat dry, low or no iron, no dry cleaning, etc. It is recommended that sellers of GOTS Goods inform end-users about end-of-life options."
|
| GOTS IM | 2.4.16 | • Section is edited for clarity
• The pesticide "Glyphosate" is removed from animal based fibre testing
|
| GOTS IM | 3.2.1 | • The interpretation of Section "3.2.1. Certified Entities shall respect Human Rights" is added. The interpretation includes reference to the core human rights treaties, including, UN Human Rights Bill, ILO Core Conventions, and OECD documents.
• The following International Conventions and Guidance Documents are referenced to and shall be observed by the certified Entities when implementing GOTS Social Criteria:
  - UN General Assembly, Universal Declaration of Human Rights, 10 December 1948
  - UN General Assembly, International Covenant on Economic, Social and Cultural Rights, 16 December 1966
  - UN General Assembly, International Covenant on Civil and Political Rights, 16 December 1966
  - Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO).
  - C190 - Violence and Harassment Convention, 2019 (No. 190)
  - 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)
| GOTS IM | 3.2.2. | • The interpretation of Section "3.2.2. Certified Entity shall respect the human rights of individuals belonging to specific groups or populations that require particular attention, including, indigenous peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families".  
  
• The interpretation includes references to the following human rights instruments:  
  
  UN Declaration on the Rights of Indigenous People, 2007.  
  UN Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities, 1992.  
| --- | --- | --- |
| GOTS IM | 3.3.1. | • The interpretation and guidance on the implementation of Section "3.3.1. Forced labour shall not be used." is added.  
  
• The reference to the ILO Conventions No. 29 and No. 105 is added. |
| GOTS IM | 3.4.1. | • The interpretation and guidance on implementing Section "3.4.1 Child labour, regardless of gender shall not be used" is added.  
  
• The interpretation of the Minimum Age criteria and guidance concerning age verification is provided.  
  
• The reference to the relevant ILO documents and best practices is provided.  
  
• The guidance also includes the Child Remediation clause, which requires Certified Entities to take all appropriate measures to remove the child from the workplace and to ensure that this child gets appropriate remedy.  
  
• Further guidance on implementing the child remediation clause and reference to the relevant ILO and OECD documents is provided. |
| GOTS IM | 3.5.1. | • The interpretation of Section "3.5.1 Discrimination in recruitment and employment practices is prohibited. Decisions about hiring, salary, benefits, training opportunities, work assignments, advancement, discipline, and termination shall be based solely on the ability to perform the job, rather than based on personal characteristics or beliefs, such as race, national origin, caste, social background, gender, religion, age, disability, marital status, parental status, association membership, sexual orientation or political opinion" is added.  
  
• Reference to the relevant ILO Conventions is added. |
| GOTS IM | 3.5.2. | The guidance to implementing Section "3.5.2 Certified Entity shall provide an environment free of discrimination and harassment, where all individuals are treated with respect and dignity" is added. |
| GOTS IM  | 3.6.1. | • The guidance on implementing Section "3.5.7 Certified Entity shall endeavour to achieve gender equality through equal, fair, and transparent recruitment, promotion, and reward" is added.  
• The reference to the relevant ILO Conventions is added. |
| GOTS IM  | 3.6.3. | • The guidance on implementing Section "3.6.3 Certified Entity shall prevent dismissals and career setbacks due to pregnancy or maternity leave" is added.  
• The Guidance elaborates on the Duration of the maternity leave, maternity leave benefits, employment protection, health protection at the workplace and breastfeeding arrangements at the workplace.  
• The reference to the ILO Convention No.183 is added. |
| GOTS IM  | 3.8.1. | • The guidance to Section "3.8.1 Freedom of association and the right to collective bargaining shall be respected" is added. Certified Entities are required to respect employees' rights to freedom of association and to collective bargaining.  
• The reference to the ILO Conventions No 87 and No 98 is added. |
| GOTS IM  | 3.10.9. | • Additional Guidance to Section "3.10.9 Certified Entity shall calculate 'Living Wages' for their respective operations. Furthermore, Certified Entity shall compare Living Wages data with their remuneration data and calculate the 'Wage Gap' for its workers" is added.  
• Certified Entities, based in the EU Member States are allowed to use the calculations of the living wage as provided for in the study “Cost of Living, Living Wages, and Minimum Wages in EU-27 countries” conducted by the Central European Labour Studies Institute (CELSI) and WageIndicator Foundation. |
| GOTS IM  | 3.11.3. | • Reference to the ILO Conventions No 1, No 14, No 30 and No 106 is added. |
| GOTS IM  | 3.14.1. | • The guidance to Section "3.14.1 Certified Entity shall, as far as possible, ensure equality of treatment between homeworkers and workers working at the facility" is added.  
• Certified Entities are required to ensure equality of treatment between the homeworkers and workers employed in the facilities. |
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<td>3.15.1 &amp; 3.15.2</td>
<td><strong>GOTS IM</strong> • The guidance to the Section &quot;3.15.1. GOTS Social Criteria shall be implemented through the due diligence process. This process shall be commensurate with risk and appropriate to a specific Certified Entity's circumstances and context. The following six steps framework shall be followed when conducting due diligence and implementing GOTS Social Criteria: 1) Certified Entity shall embed Responsible Business Conduct into its policies and management systems to undertake due diligence, 2) Certified Entity shall identify actual or potential adverse impacts on issues of Responsible Business Conduct, 3) Certified Entity shall cease, prevent or mitigate adverse impacts on issues of Responsible Business Conduct, 4) Certified Entity shall track implementation and results, 5) Certified Entity shall communicate how impacts are addressed; and 6) Certified Entity shall enable remediation when appropriate&quot; • Detailed guidance concerning each step of the &quot;six steps framework&quot;.</td>
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<td>3.15.6</td>
<td><strong>GOTS IM</strong> • The interpretation of the Section &quot;3.15.7 Certified Entity shall assign oversight and responsibility for due diligence to relevant senior management and assign board-level responsibilities for implementing Policy on Responsible Business Conduct and GOTS Social Criteria&quot; is added. • Certified Entities are required to assign senior staff member, responsible for the implementation of the Certified Entity’s RBC Policy.</td>
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<td><strong>GOTS IM</strong> • Further interpretation is included for the criteria of inspection of chemical input formulators: &quot;Chemical Formulators: On-site inspection is obligatory at the premises of formulators (see Sections 2.3.4 and 2.3.5 of GOTS). Subcontractors of Chemical Formulators: On-site inspection is obligatory at the premises of subcontracted formulators (see Sections 2.3.4 and 2.3.5 of GOTS)&quot; • Further interpretation is included for cotton ginners as: &quot;Special requirements for cotton gins Cotton ginning units shall be independently certified to GOTS. Independently certified gins may be used as subcontractors by other GOTS certified companies following all other GOTS requirements.&quot; • Further interpretation is included: &quot;registered traders can involve in trade activities with finished and intermediate GOTS Goods but cannot get involved in raw/seed/lint fibre trade.&quot; • Definition for relabelling is included:</td>
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re-labelling GOTS Goods is removing any GOTS Signs from any of the certified intermediate/finished product and/or attaching any GOTS Signs on certified intermediate/finished products for any reason.

- Further guidance is included for quality assurance activities at ginning stage:
  "Approved certification bodies ensures that every inspection carry out for ginning will be informed to GOTS Quality Assurance. They shall ensure that GOTS personnel can accompany any audits carried out during the ginning season and otherwise."

- Further guidance is included as "Guidance: Quality management of the system refers to product quality and not the organic status of the product. Reference: ISO 9001, Six Sigma or Total Quality Management (TQM)"

- Testing of GOTS Goods has been made an obligatory criteria among Certified Entities and Approved Certifiers "Certified Entities and Approved Certifiers shall plan their own regime of textile quality testing based on their risk assessment with the overall responsibility of ensuring approved inputs..."

- New guidance is included:
  "Synthetic fibre components are not permitted for group II products. Synthetic security veils are not allowed for tampons."