

Global Organic Textile Standard (GOTS)

Labelling “Organic Textiles” –
Legal conditions and GOTS requirements



GOTS Conference – Session 2 “Going for GOTS”

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Labelling 'organic fibres and textiles' • Legal basis in the EU



European Organic Regulation EC 834/2007



- Applicable to production of raw fibre materials
- Processed textile products are outside the scope of this regulation
- ⇒ **Unprocessed textile fibres can be certified to the European Organic Regulation**
- ⇒ **Textile products can NOT be certified and labelled to this Regulation; it does NOT define and protect the use of term 'organic'**

- “Truth In labelling” must be respected

Labelling 'organic fibres and textiles' • Legal basis in the US



USDA National Organic Program (NOP)



- **Applicable to production of organic raw fibre materials**
- **In principle also applicable to textile products, but requirements are made and applicable for food products**
- ⇒ **Unprocessed textile fibres can be certified and labelled to NOP**
- ⇒ **For textile products / garments in practice hardly achievable / not relevant**

Legal basis in the US • USDA recognises GOTS certification and labelling



USDA Policy memorandum (released 20th May 2011):

Clarifies that textile products labelled as 'organic' in the US must:

1. use NOP certified raw fibres

⇒ To track this, all GOTS Transaction Certificates carry related info:

15. Additional declarations

Certification of the organic fibres used for the products listed complies with USDA NOP rules yes no
(relevant information for products marketed and sold in the US; obligatory information for any GOTS TC)

2. have third party certification of the supply chain (NOP or GOTS)

“Textile products that are produced in accordance with the Global Organic Textile Standard (GOTS) may be sold as organic in the U.S.”

Labelling 'organic fibres and textiles' • Legal basis in the India



National Program for Organic Production (NPOP)



- Applicable to production of organic fibre materials
 - Indian Standards for Organic Textiles (ISOT) was developed in 2012 for processed textiles. Implementation was considered as integral part of NPOP and mandatory certification for any export of “organic textiles”
 - On 05.05.2015, the Director General of Foreign Trade (DGFT), Ministry of Commerce, informed that the procedure for export of all "organic products" with mandatory NPOP certification will be implemented from 01.06.2015 except for textiles. ([Public Notice No. 10 /2015-2020](#))
- ⇒ **The procedure will not effect organic textiles certified to GOTS. No additional burden will be created for the Indian organic textile export industry and the international buyers of GOTS certified and labelled products.**

Applicable certifications to enable “organic product” claims for textiles



Farm level

- **NPOP certification is required for any ‘organic fibres’ grown in / exported from India**
 - **NOP certification is required that textiles can be sold with ‘organic’ claims on the US market**
 - **No specific organic farming standard is prescribed before textiles can be sold with ‘organic’ claims in EU, Japan and other relevant sales markets**
- => A combination of (at least) NPOP/NOP certification makes sense for organic fibres grown in India**

Processing / manufacturing / trading level

- **Legal organic standards are not (directly) applicable/relevant**
- => GOTS certification and corresponding labelling of “organic textiles” is possible / recognised in the relevant sales markets worldwide**

GOTS labelling • Visible commitment to the consumer



- A GOTS labelled product in the retail market is the final result of the certification procedures of the entire supply chain and the visible commitment to the consumer that the product complies with all requirements of the standard
=> Thus correct and complete labelling is of utmost importance for the credibility of the standard, its certification system and its users.

GOTS Licensing and Labelling Guide



- ✓ **New issue released on 1st March 2015**
- ✓ **Sets requirements for the correct on-product and off-product logo application and GOTS referencing**
- ✓ **Provides explicit clarification under which conditions GOTS labelling and referencing is not permitted (to reduce misinterpretation and misuse)**
- ✓ **Informs on applicable License Fees for Certified Entities (120€ per facility inspected) and Annual Fees (30€ per facility); there is no additional fee for the use of the logo/labelling**

Application of GOTS labelling • Principle



In all cases the GOTS labelling can only be applied to the product / packaging by a *Certified Entity* and must have been approved by the *Certified Entity's Approved Certifier* in advance of its application (GOTS chapter 1.4)

=> If this requirement is followed consequently it is ensured that only authorised and correct on-product labelling will be applied. Accordingly all parties must be well aware about this principle.

Reasons for unauthorised / incorrect labelling



Even if the labelled products are produced by Certified Entities still unauthorised, incorrect and incomplete labelling can be found (in the retail trade).

Recurrent reasons for such transgressions and mistakes:

- Brands and retailers design labelling (e.g. for hang tags) and send it to their certified suppliers. They apply it without further checking and without asking for label release to their certifier. “It’s the buyer’s order to use it.”
- Certified Entities don’t inform their certifier about labelling for other reasons

=> Unauthorised labelling: these products may be certifiable or not – this needs to be investigated then ...

... and may lead to measures and sanctions up to recall of labelled products (from retail trade), trademark infringement steps and suspension of certification in order to safeguard credibility of GOTS labelling.

Requirements for companies labelling and/or selling *GOTS Goods* in the supply chain



All companies (processors, manufacturers and B2B traders) labelling and / or selling labelled *GOTS Goods* to other businesses must:

- ✓ **be certified (hold a *GOTS Scope Certificate*; exemption for traders < 5000€ turnover)**
- ✓ **ensure that labelling is in accordance with the provisions of the *Licensing and Labelling Guide***
- ✓ **ask for release to their *Approved Certifier* in all cases of *GOTS* labelling in advance of application (for each different artwork, product group, client)**
- ✓ **keep full records for each client that receives *GOTS Goods* including lists of all products, their specifications and quantities for review by the *Approved Certifier***

Requirements / checklist for retailers before selling labelled *GOTS Goods*



- ✓ **Ensure that the direct supplier (manufacturer or wholesaler) is certified**
=> ask the supplier for its scope certificate before ordering, consult the GOTS public data base and
- ✓ **Ensure that the GOTS on-product labelling is correct and complete and has been released by the applicable certifier**
=> ask the supplier to provide a written label release confirmation issued by the supplier's certifier – especially if the retailer designs the labelling
- ✓ **Ask for Transaction Certificates for the whole quantity of GOTS goods purchased (recommended)**
=> the retailer itself must be listed as buyer on the TC to have a valid proof
- ✓ **If the retailer (re-)labels, (re-)packs the labelled textiles, the retailer must be certified itself**

Correct and complete labelling contains



- ✓ **the GOTS logo**
(or the wording 'Global Organic Textile Standard' or GOTS)
- ✓ **the GOTS label grade**
(‘organic’ (95-100% organic fibre) or ‘made with (x%) organic materials’ (70-94% organic fibre))
- ✓ **the reference to the certifier**
- this can be the full name, short form or certifier’s logo
- ✓ **the license number of the certified entity**



Samples for correct and complete labelling



A



'Organic' T-Shirt
Certified by Certifier XY
12345



Product name can be added to label grade 'organic'

B



'Organic'
XY 12345



Shortest labelling option possible; ref. to certifier can be part of the license number

C



'Made with 90% organic cotton'
XY 12345



Black/white version; Label grade 'made with organic' correct (70-94% organic fibre)

Samples for incorrect and incomplete labelling



„100% organic“ not possible as label grade;
Reference to certifier missing



Garment must be white;
License number missing



Old GOTS logo!;
Label grade is “made with (70%) organic...”

Off product logo use by companies for advertising purpose (chapter 8)



- ✓ **Principle: Use allowed in appropriate and unambiguous context only**
- ✓ **Certified entities may advertise their certified products and the fact that their company is certified**
- ✓ **Retailers may advertise their *GOTS Goods* that are marked with the GOTS logo**
- **If the products are finally not labelled in the retail trade, they must not be advertised with GOTS logo / as GOTS certified**

Unauthorised referencing to GOTS



- **Samples of unauthorised self-claims for non-certified products:**

“This t-shirt is made from (x%) GOTS certified fabric (or yarn or cotton)”

“The textile fibres used in this mattress are GOTS certified”

=> No reference to GOTS is permitted for (final) textile products, if certification is valid for previous stages or for specific components of the product only

Public Data Base – Verification tool for Certified Entities



**Organic
certified by [certifier's ref]
License no. 12345**

A screenshot of the GOTS website's search interface. The page has a green header with the GOTS logo and the text "GLOBAL ORGANIC TEXTILE STANDARD" and "ECOLOGY & SOCIAL RESPONSIBILITY". A sidebar on the left contains navigation links: "THE STANDARD", "CERTIFICATION", "LICENSING & LABELLING", "PUBLIC DATABASE", "How to use it", "Search for products and products", "INFORMATION CENTRE", and "ABOUT US". The main content area is titled "SEARCH" and contains a search form with a "Find tool" button, a search input field containing "12345", and several dropdown menus for "Product categories", "Select Field of Operation", and "Select Country". A red arrow points from the search input field to the right, and another red arrow points from the right towards the top right.

Sources of information on the topic



- **GOTS, Manual and Licensing & Labelling Guide are available for download**
<http://www.global-standard.org/information-centre/downloads.html>
- **Website, section 'licensing & labelling', page 'How to get products labelled' summarises requirements and procedure**
<http://www.global-standard.org/licensing-and-labelling/how-to-get-products-labelled.html>
- **Our FAQ page answers the most popular questions of brand and retailers**
<http://www.global-standard.org/information-centre/faqs.html>

Thank You!

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