POLICY AND TEMPLATE FOR ISSUING LETTERS OF APPROVAL FOR GOTS ADDITIVES

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1 OBJECTIVE

This policy provides mandatory instructions and guidance for Certification Bodies (CBs) that are approved for the GOTS accreditation scope “Approval of textile auxiliary agents (chemical inputs) on positive lists” (Scope 4 of the ‘Approval Procedure and Requirements for Certification Bodies’).

The purpose of this policy and the corresponding template is to unify the layout, format and text used by all such certifiers to facilitate and standardise the handling and verification of all such Letters of Approval.

The policy shall be followed, and the corresponding template shall be used for any Letters of Approval issued for colourants and textile auxiliaries assessed on basis of Section 2.3 of GOTS Version 6.0 and all subsequent versions of the standard. The policy shall also be followed to issue Letters of Approval for Accessories. The basis of evaluation for accessories shall be criteria given in Sections 2.4.16 and 4.2 of GOTS Version 6.0.

A trader or distributor may only apply for GOTS approval with their own unique trade names if the original formulator holds a valid GOTS Letter of Approval for those products.

Effective Date
The policy shall be followed and the corresponding template shall be used for any Letter of Approval issued by Approved Certifiers. The implementation should be at the earliest possible date, but it shall not later than December 1, 2020.

2 REQUIREMENTS FOR LETTERS OF APPROVAL

2.1 ORIGINAL DOCUMENT

The individual CB’s letterhead shall contain its name and address. Each CB shall declare if their original document is a paper version or a digital version or if both options are used. If the original is a digital version the following sentence should be added at the bottom of the certificate: “This electronically issued document is the valid original version”. The CB should further specify which (unique) security features are used for the original version of the Letter of Approval (e.g. letterhead and paper layout, watermark etc.). Digital versions should be prepared in secure pdf mode. The CB should also provide the contact details (and features, if applicable) for immediately verifying the authenticity of the Letter of Approval. GOTS will share this information with all its approved certifiers.

2.2 TEMPLATE

GOTS provides a template for issuing Letters of Approval for each colourants and textile auxiliaries as well as for accessories. The requirements and guidance regarding the content of the Letters of Approval are provided below.
2.2.1 Format
The wording, font size and structure of the attached template shall be followed. The font is not prescribed. Text highlighted in yellow requires individual adaption.

2.2.2 First Page
2.2.2.1 Header
Each Letter of Approval shall contain the name and address of the CB on each page.

2.2.2.2 Title
The document is called ‘Letter of Approval’ with the subtitle ‘for Colourants / Textile Auxiliaries’ or ‘for Accessories’. Other terms (such as ‘certificate’) are not used.

General remark about the language to be used:
Only textile products that comply with all requirements and entities involved in processing, manufacturing or trading/retailing them can become ‘GOTS certified’. Inputs (dyestuffs, pigments and auxiliaries) cannot become ‘GOTS certified’ but become “GOTS approved” for application in the processing of GOTS certified textile products.

The chemical suppliers / formulators themselves do not become ‘GOTS certified’ or ‘GOTS approved’.

2.2.2.3 Number of the Letter of Approval
Each Letter of Approval shall have a unique number/code generated by the CB. It shall include: the certifiers licensing code (same as used in Transaction Certificates, box 1b, (e.g. GOTS-IMO-01, GOTS-SACL-02, GOTS-CUC IN 16) followed by a reference (or contract) number of the company for which the inputs / accessories have been assessed.

This number shall be repeated on each page.

2.2.2.4 Name and address of the company
The full name and address of the supplier / producer of inputs / accessories who is responsible, and has applied for, the assessed inputs / accessories shall be provided here.

2.2.2.5 Standard Version
When a new version of the Standard is released, CBs are requested not to accept any new applications for input / accessory approval according to the former standard version.

A Letter of Approval can only contain inputs assessed to one version of the Standard version. During the implementation period of a new standard version (usually a time period of 12 months in which the new version is released but the former version is still valid) there may exist two valid Letters of Approval for the same company, based on the two different versions of the Standard.
2.2.2.6 Declaration regarding the auditing\(^1\) of formulators

The Letter of Approval for inputs shall specify if the company concerned has been audited. One of the following statements shall be added in the Letter of Approval for inputs. This does not apply to Letters of Approval for accessories and thus need not be included.

If an audit has taken place\(^2\), the declaration shall read, “It is further confirmed that the formulator has been audited for product stewardship as well as environment, health & safety requirements of the Standard on dd / Month / yyyy.”

In cases where an audit was not required, the declaration shall read, “Since the company is not a formulator, an audit has not been performed.”

2.2.2.7 End of validity of the Letter of Approval

General revisions of the Standard are scheduled every three years. When a new version of the Standard comes in force (which is 12 months after its release, unless otherwise specified) the validity of any Letter of Approval issued under the former version terminates at the latest. Based on the CB’s procedures and risk assessment, a shorter validity period may be provided.

2.2.2.8 Authorisation

The authorisation consists of the date and place of issue, signature and name of the authorised person as well as the stamp of the CB. The GOTS logo shall not be used on the corresponding Letters of Approval.

2.2.2.9 Declarations (to come at the bottom)

The first declaration states either that all previous issues of Letters of Approval are replaced or informs on a second Letter of Approval issued based on the former version and still valid during implementation period of a new standard version (see also related advice in Section B2.2.5 ‘Standard Version’ above).

This shall be followed by two declarations stating a. that the issuing body can withdraw the Letter of Approval before it expires and b. that the company remains responsible for the correctness, completeness and current validity of the data provided. The CB may add an additional declaration that references the Letter of Approval to stipulations of the contract with the company and/or clauses of the certifier’s scope specific procedures.

In addition, the applicable accreditation body and the CB’s accreditation number shall be stated. No further information should be contained.

\(^1\) Refer to Sections 2.3.4 and 2.3.5 of GOTS Version 6.0
\(^2\) For the Letters of Approvals issued up until 1st March 2022 without an-site audit, which is the transition period for the new requirement of on-site audits, the statement shall read, “The formulator shall undergo an on-site audit for product stewardship as well as environment, health & safety requirements of GOTS Standard before 1st July 2022.”
2.2.3 Second Page (and further pages, if needed)

2.2.3.1 Table(s) Appendix listing the approved inputs or accessories

According to Section 2.3.3 of the Standard, all preparations shall be evaluated and their trade names registered on approved lists prior to their usage. This concerns all colourants (dyestuffs and pigments) as well as textile auxiliaries (including spinning additives (e.g. paraffin products), sizing and desizing agents, pre-treatment agents (e.g. washing and wetting agents, bleaches, optical brighteners), dyeing and printing auxiliaries (e.g. for improving migration, equalisation, fastness) as well as finishing agents (e.g. softeners and flame retardants).

Helping agents (e.g. Machine Oil) can be assessed and listed as well, this is however not a precondition for their use. If not listed, it is the responsibility of the CB of the processor / manufacturer to assess their compliance. Basic substances / chemicals (e.g. salt, caustic soda) are not expected to be listed on letters of approval.

When both colourants and auxiliaries have been approved, two separate lists shall be prepared – called 'Colourants (Dyestuffs and Pigments)' and 'Textile Auxiliaries'.

In the case of accessories (e.g. buttons, zippers, sewing threads, embroidery yarns), their trade names shall be released on approved lists.

If one company is supplying both chemical inputs as well as accessories, they shall hold two separate Letters of Approval from the same Certifier – one each for inputs and for accessories.

2.2.3.2 Serial Number (1st Column)

Numerical serial number of the input / accessory.

2.2.3.3 Trade Name of Input (2nd column)

In this column, the complete and unique trade name(s) of the approved inputs (or accessories) as stated on the official Safety Data Sheet (SDS), which have been provided with the application shall be listed.

2.2.3.4 Type / Utilisation (3rd column)

The type of dyestuff or the declared (main) utilisation category of auxiliaries or the intended usage of accessory shall be described. Samples are provided on the template.

2.2.3.5 Date of Approval (4th column)

The initial date of approval based on the assessment according to the declared version of the Standard shall be used (not any previous approval dates based on a former standard version). In case several Letters of Approval are issued during the validity period of one standard version, there may be several approval dates for the listed inputs.

2.2.3.6 Date of SDS (5th column)

Date of the official SDS which was taken as the basis for assessment. The CB needs to assure that
these MSDS are prepared according to a recognised norm or directive as listed in the Manual, Section 2.3.3.
This section is not relevant for accessories.

2.2.3.7 Comments/restrictions (6th column)
With reference to GOTS criteria the following information shall be provided:
  a) the copper content in weight percentage in cases where the copper content exceeds 0.1% in blue, green and turquoise dyestuffs (ref. to Sections 2.4.6/2.4.7 of the Standard which specifies a tolerance level of 5% for these shades)
  b) the permanent AOX in weight percentage in cases where the permanent AOX content exceeds 0.1% (ref. to Section 2.4.7 which specifies a tolerance level of 5% in yellow, green and violet pigments and if applicable to Section 2.3.1 which specifies a tolerance level of 1% for any other input)
  c) for any approved synthetic sizes, the following wording: "may only be used in compliance with criteria given in Section 2.4.3 of GOTS Version 6.0"
  d) for any auxiliaries used in mercerisation and containing alkali: "may only be used for mercerisation if alkali is recycled" (acc. to Section 2.4.5)
  e) for any approved synthetic finishing agents for which the declared application purpose / utilisation also includes one (or several) of the prohibited applications (anti-microbial finishing (including biocides), coating, filling and stiffening, lustring and matting or weighting) the following wording: "shall not be used for [term of application as used in Section 2.4.9, e.g. coating or weighting]"

In case of accessories,
  a) if polyurethane foam is approved for use as padding for undergarments, add wording, "Not permitted to be used for mattresses or textile bedding products."

2.2.3.8 Provide a total of the number of approved inputs / accessories listed
The tables are followed by the figure counting the total number of inputs / accessories approved and listed in the Letter of Approval.

2.2.3.9 Authorisation
The authorisation consists of date and place of issue, stamp of the CB and name of the standard. In addition, the signature and name of the authorised person shall be included.

2.2.4 Third Page (and further pages, if needed)
This page is applicable only to formulators.
2.2.4.1 Sites Appendix
This lists all the sites of the formulator that have been audited for requirements as per GOTS Version 6.0.

2.2.4.2 Authorisation
The authorisation consists of date and place of issue, stamp of the CB and name of the standard. In addition, the signature and name of the authorised person shall be included.

2.2.5 Footer
The footer on each page shall contain the wording “GOTS Letter of Approval for [Company Name] page [no of page] of [total no of pages]"

2.2.6 Reference Documents
The latest versions of GOTS Standard, Manual and other documents shall be referred to. The following are mandatory supplements to this policy and may be updated by GOTS at any time. CBs shall use the most recent published version of each document.
   a) Template of the Letter of Approval for chemical inputs
   b) Template of the Letter of Approval for accessories

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Important:
The following verbal forms are used to indicate requirements, recommendations, permissions, or capabilities in this policy:
   • “shall” indicates a mandatory requirement
   • “should” indicates a recommendation
   • “may” indicates a permission
   • “can” indicates a possibility or capability

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