

Why GOTS?

GOTS CERTIFICATION HELPS ENSURE COMPLIANCE WITH LEGAL REQUIREMENTS AND NGO DEMANDS (US/Europe/Greenpeace)



Countries around the world have various laws, regulations and guidance regarding how textiles are processed so as to protect workers and the environment, while NGO's have also made demands.

Below we outline five leading policies and describe how certification to the [Global Organic Textile Standard \(GOTS\)](#) helps ensure compliance with the related legal / voluntary requirements.

GOTS prohibits the use of all chemicals that don't meet stringent criteria for toxicity and / or those which are harmful to humans and environment; regulates the treatment of any wastewater and eliminates the use of harmful processing techniques that can cause adverse effects on workers' health & safety, while ensuring compliance through a strict independent inspection and certification system.

Certification to GOTS is the most efficient and cost-effective way to meeting all these requirements and demands.

Below are outlines of key law, regulations, and policies that address toxic inputs in apparel.

➔ **California Safe Drinking Water and Toxic Enforcement Act of 1986 - Proposition 65 (1986)**

Proposition 65ⁱ is intended to protect California citizens and the State's drinking water sources from almost [1000 chemicals](#) known to cause cancer, birth defects, or other reproductive harm, and to inform citizens about exposures to such chemicals. The law requires businesses to notify Californians about significant amounts of chemicals in the products they purchase (including in textiles), in their homes or workplaces, or that are released into the environment. The law also prohibits California businesses from knowingly discharging significant amounts of listed chemicals into sources of drinking water.

How does GOTS help? GOTS prohibits the use of chemicals known to cause cancer, birth defects, or reproductive harm, which include chemicals on the Prop 65 list including Formaldehyde, Lead, Cadmium, PVC, Phthalates etc. GOTS approved chemical inputs necessarily are rigorously screened before their use is permitted in textile processing. **Therefore, textile companies can use GOTS as a risk management tool for compliance to Prop 65.**

➔ **U.S. Consumer Product Safety Improvement Act - CPSIA (2008)**

The Consumer Product Safety Improvement Act (CPSIA)ⁱⁱ addresses, among other things, asbestos, lead and phthalates in consumer products including children's sleepwear. It requires domestic manufacturers or importers of non-children's products to issue a [General Certificate of Conformity \(GCC\)](#) which

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certifies that a product meets all applicable safety laws and regulations enforced by the Consumer Product Safety Commission (CPSC).

How does GOTS help? GOTS prohibits the use of all CPSIA inputs of concern, including phthalates, brominated and chlorinated flame retardants, as well as numerous other classes of toxic chemicals. GOTS also strictly regulates to the lowest values of Lead.

Certified operations must undertake testing in accordance with a risk assessment to ensure compliance with GOTS. All GOTS Goods, the components of these products, and the inputs used are to be included in this risk assessment and therefore potentially subject to testing.

➔ **U.S. Department of Agriculture (USDA) Policy Memorandum on Labelling of Textiles That Contain Organic Ingredients (2011)**

The U.S. Department of Agriculture's National Organic Program (USDA's NOP) on May 20, 2011, issued a Policy Memorandum regarding "Labelling of Textiles That Contain Organic Ingredients"ⁱⁱⁱ that clarifies how organic fibre-containing products may be labelled.

How does GOTS help? Textile Products that are produced in accordance with GOTS may be sold as "organic" in the US.

➔ **Regulation on Registration, Evaluation, Authorization, and Restriction of Chemicals - REACH (2006)**

REACH^{iv} requires all companies manufacturing or importing chemical substances into the European Union in quantities of one [tonne](#) or more per year (including in textiles) to register the substances with the [European Chemicals Agency](#) (ECHA). In addition, REACH addresses the use of chemical [substances of very high concern](#) (SVHC) which are carcinogenic, mutagenic, reprotoxic, persistent, bio accumulative, or endocrine disrupting. ECHA must be notified of the presence of SVHCs in articles if the total quantity used is more than one tonne per year and the SVHC is present at more than 0.1% of the mass of the object. As of 17 December 2015, there are 168 SVHCs on the candidate list for authorization.

How does GOTS help? GOTS specifically prohibits the use of ALL SVHCs as a part of its chemicals approval process. In addition, GOTS prohibits the use of chemicals which are classified under specific risk and hazard phrases, whether they are part of any SVHC list or not. So, the user of GOTS approved chemical inputs can be sure that it is free from substances listed under SVHC by ECHA. In addition, given that each stage of the supply chain must become certified to GOTS by an independent party, the information is verified, readily available, and transparent.

➔ **Regulation amending Annex XVII of REACH as regards nonylphenol ethoxylates (NPEOs) in textile articles**

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The EU COMMISSION REGULATION 2016/26 of 13 January 2016 amended Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards nonylphenol ethoxylates. The regulation stipulates that textile articles in textile which can reasonably be expected to be washed in water during their normal lifecycle, shall not be placed on the market if they contain concentrations of nonylphenol ethoxylates (NPEOs) equal to or greater than 0,01% (100 mg/kg) by weight of that textile article or of each part of the textile article after 3 February 2021.

NPEOs are part of the larger chemical group commonly referred to as Alkylphenol Ethoxylates (APEOs). They are known to have been widely used in the textile industry as complexing agents, surfactants, dispersing agents etc. They are known endocrine disruptors.

How does GOTS help? GOTS specifically prohibits the use of APEOs including NP (nonylphenol), OP (octylphenol), NPEOs and OPEOs (octylphenol ethoxylates) in textile chemicals such as complexing agents or surfactants as a part of its chemicals approval process. In addition, GOTS requires that limit values for residual traces due unavoidable contamination be below 20 mg/kg for APEOs. What that means is that GOTS certified goods are already compliant to the EU Regulation. Furthermore, the GOTS certification process involves certifying bodies confirm that all dyes and chemicals used for GOTS goods processing are free of APEOs End Fragment

➔ **Zero Discharge of Hazardous Chemicals / Roadmap to Zero (2011 - ongoing)**

Greenpeace's Detox campaign^v challenges clothing brands to eliminate the use and discharge of hazardous chemicals by 2020. By the end of 2015, 18 companies had joined the resulting independent Zero Discharge of Hazardous Chemicals (ZDHC) working group, and participants follow the [Joint Roadmap towards Zero Discharge of Hazardous Chemicals](#). The Roadmap includes a Manufacturing Restricted Substance List (MRSL) which calls for the elimination of the use and discharge of 11 groups of chemicals (known to be persistent, hormone-disrupting and having various other ill-effects) into waters during manufacturing of apparel and footwear. These chemicals groups include 1. alkylphenols 2. phthalates 3. brominated and chlorinated flame retardants 4. azo dyes 5. organotin compounds 6. perfluorinated chemicals 7. chlorobenzenes 8. chlorinated solvents 9. chlorophenols 10. short chain chlorinated paraffins, and 11. heavy metals - cadmium, lead, mercury, and chromium (VI).

How does GOTS help? GOTS prohibits use not only of the 11 Greenpeace-targeted chemical families but far more, given its stringent environmental and human toxicity requirements. It also provides for a "Positive List" of the trade names of GOTS approved inputs (dyes, pigments, inks, auxiliaries etc.). All chemical inputs (dyes and auxiliaries) used in the processing chain of GOTS

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certified textiles are subject to approval by a GOTS Approved Certifier *prior* to its usage. GOTS has been following the system of MRL for chemical inputs since inception.

Furthermore, the textile processing facilities are inspected by accredited third party certifying bodies for social and environment compliance and the end products are required to be tested as per Risk Assessment done by the certifying bodies.

An annual on-site inspection of participating textile operations by an independent and accredited Certifier verifies/ensures that inputs used are approved.

ⁱ <https://oehha.ca.gov/proposition-65/about-proposition-65>

ⁱⁱ <https://www.cpsc.gov/en/Regulations-Laws--Standards/Statutes/The-Consumer-Product-Safety-Improvement-Act/> or <https://www.cpsc.gov/PageFiles/129663/cpsia.pdf>

ⁱⁱⁱ USDA document: <https://www.ams.usda.gov/?dDocName=STELPRDC5090967>

^{iv} http://ec.europa.eu/environment/chemicals/index_en.htm

^v <https://www.roadmaptozero.com/about/> and

<https://www.greenpeace.org/archive-international/en/campaigns/detox/fashion/about/progress-and-hurdles-on-the-road-to-Detox/>