

Sustainability certification in the textile sector

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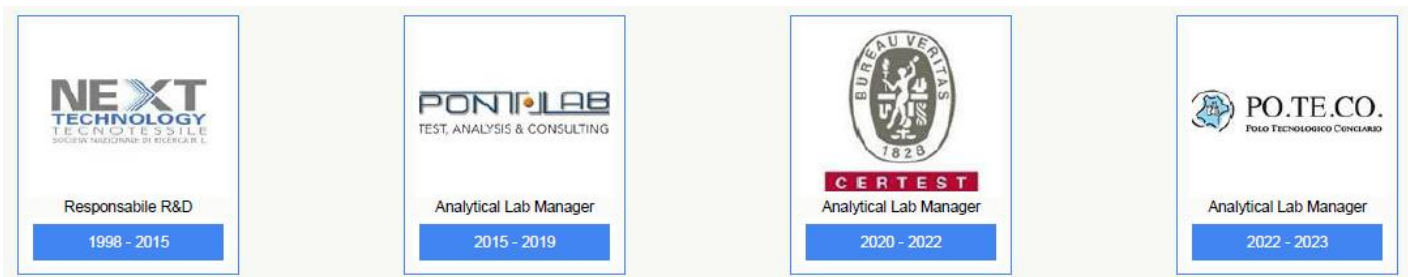
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Introduction

- **What I do**

- Consultancy in R&D, Training, Innovation and Technology transfer for the Textile, Leather and Polymeric Materials sectors
- ICEA Auditor – Lead Auditor for Sustainable Textile Certification (AU-19/0923) according to GOTS 6.0:2020, OCS 3.0:2020, GRS 4.0:2017, RCS 2.0:2017, RD 3.0:2019, RAF 2.2:2023 CCS 3.1:2022
- ACCREDIA Inspector – Testing Laboratories Dep.
- ANGQ Consultant – National Association for Quality Assurance

- **Work experience**



Introduction

Sustainability is not just synonymous with ecology for the textile industry. In fact, the concept can be understood in many different ways beyond environmental respect. For this reason, an increasing number of companies in the textile supply chain are committed to comprehensive corporate sustainability projects.

How? By ensuring the safety of workers and consumers, respecting the rights of animals and people, streamlining creative and production processes, promoting upcycling, and investing in innovation and research. Therefore, to foster sustainability in the fashion industry, companies can use various tools, such as **certifications**.

A **standard** represents a set of specifications, criteria, and guidelines that define how a specific operation should be carried out and how processes should be managed. Additionally, a certification is a requirement of a legal or contractual nature. As a result, a material or process can be certified according to a specific standard or multiple standards, in both the social and environmental dimensions. The certification represents a guarantee when regulations do not impose specific obligations in this regard.

Sustainable production and environmental impact assessment

There are various types of certifications, each essential to ensuring the sustainable production of goods and services, as well as the assessment and communication of environmental impacts throughout the product's lifecycle.

Here are the most widespread environmental certifications, among others, in the Italian textile industry, and what they are used for:

- **Global organic Textile Standard (GOTS)** and **Organic Content Standard (OCS)** ensure that textile products contain bio-based natural fibers;
- **Global Recycled Standard (GRS)** and **Recycled Claim Standard (RCS)** ensure that textile products are made from recycled materials;
- **Responsible Down Standard (RDS)** ensures that feathers used in paddings are sourced according to animal welfare criteria.
- **Responsible Animal Fiber (RAF)** is the most important standard for certifying products that contain animal fibers from responsible farming practices. It includes the RWS (Responsible Wool Standard), RMS (Responsible Mohair Standard) and RAS (Responsible Alpaca Standard) standards
- **Nativa Precious Fiber (NPF)** is the new certification mark for products containing wool fibers
- **Sustainable Fiber Alliance (SFA)** is the first holistic sustainability standard for cashmere production, aimed at promoting responsible practices for the benefit of people, livestock and environment.



The standard is internationally promoted by Textile Exchange, a non-profit organization that operates at the international level for the responsible promotion and development of sustainability in the textile sector.

Based in the USA, Textile Exchange includes approximately 700 organizations, including some of the most important retailers and brands committed to promoting environmentally and socially responsible choices and corporate practices.

A background image showing various colorful fabric rolls in shades of red, blue, green, and orange, with a semi-transparent green box overlaid containing text.

Textile Exchange is a global non-profit that works closely with our members to drive industry transformation in preferred fibers, integrity and standards and responsible supply networks.

TE INDUSTRY STANDARDS



Global Organic Textile Standard (GOTS)





GLOBAL ORGANIC TEXTILE STANDARD ECOLOGY & SOCIAL RESPONSIBILITY



The Global Organic Textile Standard was first developed and adopted in 2003, by organizations dedicated to the promoting and developing organic farming and natural textile:

- International Association of Natural Textiles – INV (Germany)
- Soil Association (United Kingdom)
- Organic Trade Association – OTA (USA)
- Japan Organic Cotton Association – JOCA (Japan)

What is meant by “Organic Textile Product”?

A textile product can be classified as organic if:

- It is primarily composed by natural plant or animal fibers, certified by organic farming;
- It has been produced in compliance with environmental and social criteria defined by the GOTS. The use of GOTS is essential since textile manufacturing processes (starting from ginning, followed by spinning, weaving, and all subsequent finishing processes) are generally not covered by any national or regional legislation on organic farming.

Aim of the standard

The aim of this standard is to define the requirements to guarantee the use of the “organic” designation for textile products, from the collection of raw materials, through ecologically and socially sustainable production, to labeling, and thus provide a reliable assurance to the end user

Field of Application

All products containing at least 70% of organic natural fibers can be certified

These products include, but are not limited to: fibers, yarns, fabrics, clothing, textile accessories (worn or carried); textile toys; household linen; mattresses and bed linen; personal care products.



GOTS applies to all manufacturing processes from the fiber production, to the creation of products intended to the end consumer.

Field of Application

The GOTS standard is based on **mandatory criteria** concerning:

- Criteria for natural fibers and product composition
- Specific requirements for manufacturing processes
- Requirements for chemicals used in processing
- Identification and traceability management
- Management of environmental aspects
- Management of social aspects

Certificate of Conformity

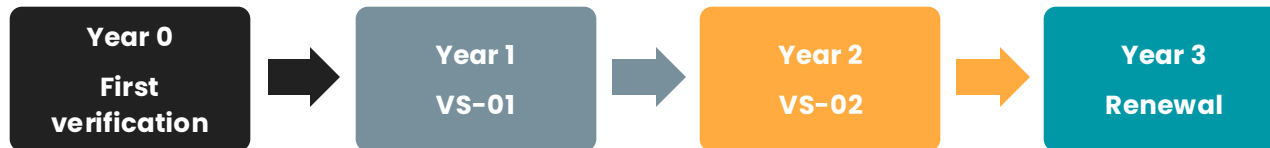
The Certificate of Conformity establishes the compliance of products considered in the assessment with criteria set by GOTS. It is issued by an Approved Certification Body at the end of the verification and certification process:

The Certificate of Conformity indicates:

- A list of the products or the product categories that have been certified
- A list of the production units and the production and commercialization activities that have been approved under the certification
- A list of subcontractors and the activities they perform within the evaluated GOTS processes.

Certificate of Conformity

- a) The validity of the Certificate of Conformity must not exceed 15 months from the issuance date (SC Policy V2.1 §B.2.2.8).
- b) The date one day after the expiration date of the SC is designated as «Anniversary date». The SC typically expires annually one day before the anniversary date (SC Policy V2.1 §B.2.2.8).
- c) The re-issuance of the Certificate of Conformity is based on the positive outcome of the annual surveillance audits.





Composition Criteria:

Requirements for fiber composition of materials

Pre-requisite – The use of fibers derived from production areas where there is persistent and significant violation of, or incontestable evidence of:

- ILO standards (where relevant to agriculture)
- Persistent land grabbing phenomena
- Animal welfare principles (including “Mulesing”)

is not allowed

Products sold and labeled as “organic”

Products with a content of certified natural fibers greater than 95% by weight.
The remaining 5% can be made up of other fibers in accordance with the criteria outlined in Art. 2.4.9.

Products made up of “x% of organic fibers”

Products with a content of certified natural fibers greater than 70% by weight.
The remaining 30% can be made up of other fibers in accordance with the criteria outlined by the Art. 2.4.9.

Requirements for additional fibrous materials (1/3)

Up to a maximum of 30% ($\leq 30\%$):

- Natural fibers from conventional agriculture. All the non-GMO plant or animal-based fibers;
- Lyocell and protein-based fibers derived from: certified organic non-GMO raw materials; pre- or post-consumer recycled material; material certified according to environmental management system standards (e.g., FSC or PEFC);
- Recycled synthetic fibers from pre- or post-consumer material: only polyester, polyamide, polypropylene, elastomultiester (elasterell-p), and polyurethane (elastane);
- Fibers derived from PLA made from non-GMO material.

Requirements for additional fibrous materials (2/3)

Up to a maximum of 10% ($\leq 10\%$):

- Regenerative fibers, such as Lyocell, viscose, and modal from non-GMO raw materials;
- Synthetic fibers from virgin material: only polyamide, polypropylene, elastomultiester (elastarell-p), and polyurethane (elastane);
- Stainless steel and mineral fibers.

Requirements for additional fibrous materials (3/3)

Forbidden:

- Conventional cotton;
- Conventional angora fibers (mohair fibers obtained from Angora goats, however, are allowed);
- Virgin polyester;
- Acrylic;
- Asbestos, carbon, and silver fibers;
- Mulesed wool.

Transaction Certificates (TC)

Transaction Certificate (TC) Requirements



- The **Transaction Certificate** (TC) is a document issued by a Certification Body (CB) that verifies the compliance of product lots with GOTS criteria when sold from one Certified Organization to another.
- TCs can only be issued to an organization that holds a valid Scope Certificate for the sale of certified products. The TC must be issued by the same Certification Body that issued the Scope Certificate.
- TCs are issued every time there is a change of ownership of the products, and the information they contain must exactly match the details provided in sales documents.



Criteria: Chemicals

Chemical evaluation

All chemicals used in the manufacturing processes of GOTS products must have been previously:

Evaluated Approved Registered

by a Certification Body authorized and accredited by Global Standard GmbH for this specific purpose of accreditation

The request for approval must be submitted by the producers/distributors of chemicals

Approved Certification Bodies



**CCPB Certificazione e Controllo
Prodotti Biologici ltd b.v.**

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Soil Association Certification Ltd.

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**USB Ulusal Sistem Belgelendirme
Hizmetleri Ltd. Sti.**

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Turkey
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fax: +90 2324464912

Chemicals

The document that certifies the compliance of chemicals with GOTS criteria

Letter of Approval

Issued by an authorized Certification Body and containing the trade names of chemicals considered compliant with the GOTS standard criteria

CERTIFICATION PROCESS

1 Preliminary evaluation

Initial assessment of products and production processes including the evaluation of both the composition of the product for which certification is required and the compliance of organic raw materials and suppliers, and the suitability of chemicals used in specific manufacturing stages.

2 On-site inspection

On-site inspection aimed at verifying the actual compliance of products with GOTS criteria, the proper organization and management of manufacturing processes and internal procedures that could compromise product compliance with standard's requirements, as well as adherence to relevant environmental and social criteria.

3 Compliance certificate issuance

The certificate is issued based on the information and data collected during the evaluation and verification processes. It includes a list of the certified products and processes.

4 Surveillance

Annual surveillance, i.e. periodical inspections at the production units, storage and distribution centers, aimed at verifying continued adherence to certification standards

Global Recycle Standard (GRS)



GRS general objective

The GRS (Global Recycle Standard) addresses the need to provide an environmental declaration verified by a third party, enabling:

- a) Recycled material traceability
- b) Verification of recycled material content in their products (both intermediate and finished)
- c) Reduction of environmental and social impact

Scope

The GRS applies to all products containing at least 20% recycled material.

The standard applies to any product and production chain.

Only products containing at least 50% recycled materials can be labeled as GRS.

The standard sets social and environmental principles for the production of GRS-certified products.

The standard limits the use of chemicals in the manufacturing of GRS products; it does not include requirements for chemicals in recycled materials, or contaminants that may be present in GRS-certified products

Organizations involved in Material Recycling (as defined in section A of the standard) are subject to GRS certification

Out	In
<ul style="list-style-type: none">• Waste collection, by-products• Sorting, selection, grouping	<ul style="list-style-type: none">• Material recycling• Each manufacturing process through which recycled material is used to create intermediate products (e.g. yarns and fabrics) or finished products intended for the consumer
Purchase, storage, sorting	Fraying, Tattering
Certification not required	Certification required

Origin of “recovered”/ “recycled” materials

Origin of materials in the GRS processing cycle (upstream in the supply chain)

- **Waste**, derived from entities authorized for sorting and treatment aimed at enhancing its recovery
- **By-products**
 - Suppliers of recovered material and by-products, as established in **§A4.1a**, are not required to be certified
 - In this case, in accordance with **§ A4.1b** the «Declaration of Recovered Material» must be collected and retained

Fibers obtained from internal sourcing

Among the materials recovered from their own production cycle are:

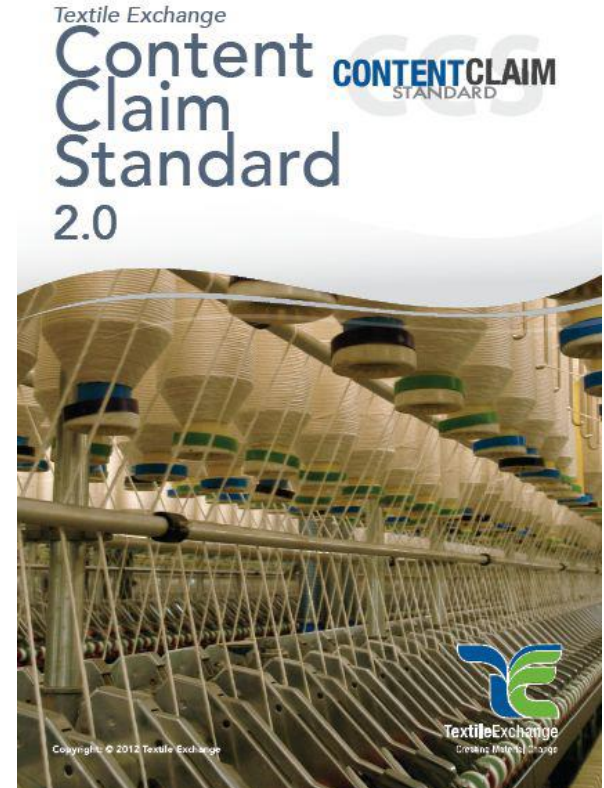
Regenerated/ recycled fibers derived from the treatment of «by-products yet not sorted for fiber composition and color» even if purchased in years prior to the certification request date.

Such fibers are permitted for the manufacture of GRS- and/or RCS-certified textile products provided that the certified operator adopts a registration system in accordance with the provisions of A4.1c

Supply chain requirements

Organizations involved in the production and trade of GRS products are subject to GRS Certification

The Global Recycle Standard requires compliance with the requirements of the Content Claim Standard



Supply chain requirements

In addition to the requirements of the CCS, all the organizations involved in the production or trade of GRS products must satisfy the following requirements:

- All recycled materials entering the supply chain must have a valid TC issued by an authorized Certification Body.
- The percentage of pre- and post-consumer material content must be separately registered for each lot and recorded on the TC.
- Traders with an annual turnover of less than \$10,000 in GRS products, and retailers who only sell to end consumers, are exempt from the certification requirement; unless they (re)package or (re)label GRS products.

CERTIFICATION PROCESS

1 Preliminary evaluation

Initial assessment of products and production processes including the evaluation of both the composition of the product for which certification is required and the compliance of organic raw materials and suppliers, and the suitability of chemicals used in specific manufacturing stages.

2 On-site inspection

On-site inspection aimed at verifying the actual compliance of products with GRS criteria, the proper organization and management of manufacturing processes and internal procedures that could compromise product compliance. The maintenance of the chain of custody is ensured to guarantee that the recycled material is correctly identified in order to avoid issues of confusion and/or substitution with other materials. At the same time, adherence to relevant environmental and social criteria is verified.

3 Compliance certificate issuance

The certificate is issued based on the information and data collected during the evaluation and verification processes.

4 Surveillance

Annual surveillance, i.e. periodical inspections at the production units, storage and distribution centers, aimed at verifying continued adherence to certification standards

Greenwashing Directive



What is it about?

The European legislator has recently intervened in the regulation of misleading commercial practices and certification marks with Directive (EU) 2024/825, approved on February 28, 2024, which must be transposed by Member States by 2027. It aims to steer the market towards more environmentally sustainable choices and protect consumers from the so-called «**greenwashing**» phenomenon. This expression encompasses all the communication and marketing strategies implemented by businesses, institutions, or other entities aimed at concealing the actual environmental impact of specific economic activities, deceptively presenting them as eco-sustainable.

When do the new rules come into force?

The floor now belongs to the Member States:

they are required to transpose the directive into national laws by **March 27, 2026**,
and the rules will have to be applied starting from **September 27, 2026**

New developments in terms of unfair commercial practices

In order to enable truly sustainable purchasing decisions, the new directive amends the previous Directive (2005/29/CE) on misleading commercial practices. In the future, the product's essential features, in relation to which misleading commercial practices are prohibited, will explicitly include the product's «ecological or social features» and its «circular aspects, such as durability, reparability, or recyclability».

Blacklist

The blacklist of behaviours that are to be considered unfair commercial practices under Annex I of the Directive 2005/29/EC makes unnecessary any further evaluation in order to recognize their unlawfulness.

Among the new behaviours introduced in the blacklist the first one is the most significant, since it considers **inherently unlawful**:

«Displaying a sustainability label that is not based on a certification system or not established by any public authority»

A **sustainability label** – as defined in the newly approved Directive – means:

«Any trust mark, quality mark, or equivalent, whether public or private, of a voluntary nature, intended to distinguish and promote a product, a process, or a business with reference to its social or environmental characteristics, or both, excluding mandatory labels required under national or Union law»

Blacklist

The blacklist will soon include, among others:

- The labelling of products with a **sustainability label** that is not based on a certification system or has not been established by public authorities;
- The use of **generic environmental claims** (e.g. «ecological», «green», «sustainable») for which traders are not able to provide evidence;
- The claim that a product has a neutral, positive, or negative impact on the environment, in terms of **greenhouse gas emissions**, when, in reality, such emissions are merely offset.

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