



Greenpeace Global Textile Procurement Trial Standard

Precautionary chemical management in textile procurement

Version **December** 2019

Introduction

Since 2011, Greenpeace's Detox campaign has been challenging the clothing industry to urgently take responsibility for its significant contribution to pollution from the use and discharge of hazardous chemicals. It secured commitments from 80 companies, representing about 15% of the market, to eliminate their discharges of hazardous chemicals by 2020. As a result, the campaign has set the standard for chemical management and transparency in the textiles supply chain on the use and release of hazardous chemicals.

However, in 2012, the companies targeted by the campaign tested Greenpeace merchandise and found hazardous chemicals. Therefore, to walk the talk, the organisation agreed to suspend the sale or gifting of textile products, stating that "as an organisation we want to supply our supporters with t-shirts that change the world, but we will only be able to sell textiles again when the industry can produce toxic-free fashion".¹ As the campaign's goal of zero discharges of hazardous chemicals by 2020 approaches, there has been significant progress by Detox committed brands. As a result, their influence on the supply chain is transforming the sector including developments in third party auditing.

A Greenpeace Procurement Pilot Project, which ran from September 2017 to September 2018, was set up to perform a review of Greenpeace's Global Textile Procurement Policy of 28 November 2012, and assess if we can lift the suspension on selling textile products without undermining the sector's ongoing implementation of the changes achieved by Greenpeace's Detox campaign. The outcomes of the pilot project showed that this is achievable and that there is a third party audit with a sufficiently credible standard using the best practice available on the market as a result of our campaign. A decision was made by the IED to take a phased approach and begin trialling this new standard with other suppliers, and to allow the selling and gifting of textile products from any supplier that meets the standard.

The objective of the trial standard is to ensure that natural fibre textile products made for merchandising and gifting by Greenpeace have minimal environmental impact and are

¹ As indicated in Greenpeace's previous version of this policy called the "Global Textile Procurement Policy" of 28 November 2012, which is publicly available at:
<http://www.greenpeace.org/international/en/campaigns/detox/fashion/about/our-textile-policy/#a0>

procured in line with the organisation's core values.² It aims to achieve an ambitious level of Detox transparency and management (progressive elimination) of hazardous chemicals.

Trial standard

This standard requires best practice in eliminating the use of Hazardous Chemicals at any stage of the manufacturing of Textile Products.

Capitalised words and expressions used in this policy have the meanings as set out in **Annex 1**, unless the context clearly requires otherwise.

During the period of this trial it is foreseen that either the Greenpeace offices and/or the Greenpeace International Textile Procurement Working Group may contact prospective suppliers with the intention of developing a list of suppliers that meet the standard. Greenpeace offices should ensure close coordination with the Textile Procurement Working Group during this phase.

1. Applicability or Scope

This trial standard applies to the procurement by Greenpeace of any Textile Products made for sale to the public as merchandise, or for gifting. **Textile products for use by Greenpeace internally, by volunteers, activists, crew or staff within the organization or onboard Greenpeace ships, continue to follow the policy adopted in 2012 for the time being.**

Only Natural Fibre based Textile Products are allowed. Textile Products made of synthetic fibres are not allowed for gifting or for sale due to their environmental impacts. The inclusion of synthetic accessories (such as labels) within a Textile Product should only be permitted when it is technically unavoidable and should be kept to the minimum possible. The procurement of synthetic textiles for our internal use when necessary for technical performance is permitted and out of the scope of this standard.

2. Key Minimum Requirements and Procedures

Assessment of need

Any purchase of Textile Products for sale or gifting should only proceed if considered necessary or of sufficient added value, based on a clear justification taking into account the relevant organisation or campaign objective, the [environmental impacts of such purchase and our demands on the clothing industry to tackle over-consumption](#) of Textile Products. Before purchasing any Textile Products, the relevant Budget Holder must consider why a purchase of Textile Products is deemed necessary or of sufficient added value.

² The core values of Greenpeace are publicly available at:
<http://www.greenpeace.org/international/en/about/our-core-values/>

Environmental criteria

The intentional use of Hazardous Chemicals is strictly forbidden in all steps of the manufacturing process of Textile Products, including printing and chemical finishing (e.g. for dirt or water repellency). To this end the relevant Budget Holder or the Textile Procurement Working Group shall specify the following requirements to any (potential) Contracted Supplier, before entering into a contract:

- 1) transparency of the manufacturing supply chain;
- 2) verification of raw/untreated wastewater discharges and Facilities;
- 3) verification of the raw materials and the final product;
- 4) procedural requirements for final delivery;
- 5) other requirements; and
- 6) public transparency

(all as set out in more detail in 2.1 - 2.6 below)

2.1. Transparency of the manufacturing supply chain

Before entering into a contract, the potential Contracted Supplier will:

2.1.1 provide a Supply Chain Description in respect of the Textile Products in question, including names and locations of all Subcontractors and identifying Wet Process supplier Facilities, by completing a supply chain transparency form, an example of which is attached to this policy as **Annex 2** or disclose in another way (e.g. interactive map of supply chain) so long as the information required in Annex 2 are included; and

2.1.2 ensure that all Subcontractors involved in the manufacturing of the Textile Products agree to the above, and provide details of all individual Wet Process supplier Facilities to the auditor OEKO-TEX®, or Equivalent, to facilitate verification (please see below paragraph 2.2).

2.2. Verification of Wet Process supplier Facilities

2.2.1 All Wet Process supplier Facilities identified in paragraph 2.1.1 must pass the Greenpeace Requirements with respect to Facilities as specified in **Annex 3** (customised Facility analysis using DETOX TO ZERO by OEKO-TEX®).

2.2.2 The findings of OEKO-TEX® of the assessment as referred to in paragraph 2.2.1 shall be reported by OEKO-TEX® as specified in **Annex 3** to the Contracted Supplier.

2.2.3 Procedural requirements: before confirmation of the relevant product order (i.e. before entering into a contract), the potential Contracted Supplier will provide the

assessments for all individual Wet Process supplier Facilities to the Budget Holder and either publicly disclose them and/or agree to their publication.

2.3. Verification of the raw materials and the final Textile Product

The following requirements need to be specified in the contract for the product order:

2.3.1 Raw materials certification

All Textile Products purchased under this policy must be made from:

- 100% organic cotton or other Natural Fibre,³ to be certified on the basis of recognized international or national organic standards.⁴ This is fulfilled by using Global Organic Textile Standard (GOTS) (label grade Organic) or bioRe® Sustainable Cotton, or Equivalent standards.
- fairly traded raw materials, i.e. respecting social, economic and environmental standards for both companies and the farmers and workers growing crops, to be certified at the raw material supplier level, using preferably the Fairtrade standard (labelled 'Fairtrade cotton'), or bioRe® Sustainable Cotton, or Equivalent programmes⁵.

2.3.2 Textile Product certification: all Textile Products purchased by Greenpeace must pass the Greenpeace Requirements with respect to Textile Products, as specified in **Annex 3** (customised product testing within Standard 100 by OEKO-TEX® Annex 6 - 'baby').

2.3.3 The findings of the OEKO TEX® assessment as referred to in paragraph 2.3.2 shall be reported by OEKO TEX® as specified in **Annex 3** to the Contracted Supplier.

2.3.4 Procedural requirements: the Contracted Supplier shall share the laboratory testing report from the Textile Product test with the relevant Budget Holder.

2.4 Procedural requirements for final delivery

Before delivery of the order and payment in respect of the Textile Products, the Contracted Supplier will provide to the relevant Budget Holder the certifications regarding:

³ See section 3 below (Exceptions) for more details on non cotton fibres.

⁴ Recognised international or national standards are the IFOAM family of standards, EEC 834/2007, USDA NOP.

⁵ See section 3 below (Exceptions) for more details.

i. Organic raw materials (both supplier and product lot certificates, eg. a GOTS Transaction Certificate) and fair trade certifications; and

ii. a Letter of Overall Compliance delivered by OEKO-TEX® as specified in **Annex 3**, confirming an overall conclusion of pass, i.e. that all the Greenpeace Requirements (in respect of both the Wet Process supplier Facilities and the Textile Products) as referred to in paragraph 2.2.1 and 2.3.2 are met.

2.5. Other requirements and considerations

Contracted Suppliers shall be required:

- to explain how contamination of the Textile Products with Hazardous Chemicals as a result of transport or storage will be prevented; and
- not to use PVC materials or biocides during transport or storage.⁶

The Budget Holder should also consider specifying other relevant aspects, such as:

- transparency on social issues and human and labour rights;⁷ and
- those issues resulting from Greenpeace campaign objectives, such as the use of a Reusable Packaging System (including the packaging of the individual Textile Products), renewable energy and minimisation of transport, energy, water use and waste, etc.

2.6. Public transparency

The Contracted Supplier shall ensure that the full documentation, i.e.:

- the Supply Chain Description, (as referred to in section 2.1.1.above);
- the assessments for all individual Wet Process supplier Facilities (as referred to in section 2.2.3 above), i.e. full DETOX TO ZERO by OEKO-TEX® “Status Report” / letter of compliance (for each audit and intermediate audits/spot checks) and the corresponding independent laboratory testing report for Facility wastewater discharges;
- the laboratory testing report from the final Textile Product (as referred to in section 2.3.4 above), i.e. full laboratory testing reports for discharges and product with detection levels and methodologies and location and timing of samples;
- the Letter of Overall Compliance; and

⁶ GOTS is an example of accepted standard for these two points, GOTS certification of the contracted supplier should be acceptable as a valid proof for compliance (see section 2.4.12 of GOTS Version 5.0)

⁷ Some of the most recognised Social standards in the supply chain are for example [GOTS \(Version 5 Section 3\)](#), [FairWear Foundation](#), [Ethical Trade Initiative](#) and [Social Accountability International / SAI - SA 8000](#). In 2016 Fairtrade also set up the “[Fairtrade Textile Production programme / Standard](#)”.

- all other certifications as detailed above in sections 2.4 and 2.5; will be publicly available at a single location on the Contracted Supplier's website or via a third party transparency system.

Certification and auditing providers

This standard specifies the use of tools and certifications provided by OEKO-TEX®, GOTS and Fairtrade, which (to our best knowledge) represent the best practice tools available as of the date of this policy. However, this standard does not exclude the use of other certification schemes that are Equivalent,⁸ should these be available now or become available in the future.

Contracting

The Budget Holder should strive to negotiate master (framework) contracts with the Contracted Supplier. Master contracts deal with general issues, and may include required service levels and specifications. Having these in place will help handle urgent requests for Textile Products while ensuring adherence to this policy.

Supplier management

As certification and auditing is done annually, the relevant Budget Holder must re-check annually that the Contracted Supplier continues to have valid certification and verification and to meet the requirements of this policy. If the certification and verification is out of date, these must be obtained and confirmed by the Budget Holder before any new orders can be placed.

3. Exceptions

Certification alternatives to GOTS organic Natural Fibres should be assessed on a case by case basis in conjunction with the Greenpeace International Global Textile Procurement Working Group.

Regarding Fairtrade certification, if the Contracted Supplier cannot source Fairtrade Mark cotton or other Natural Fibres within the region, or if it uses an Equivalent pre-existing fair trade certification system, the Contracted Supplier shall provide a description of how the fibre sourcing is improving the farmers life, how they are building long term relationships and how it is working towards sourcing Fairtrade or Equivalent in the future. These certifications or programmes used in the supply chain should be transparent as per section 2.1.1.

Otherwise, there are no exceptions to this policy.

⁸ A decision on equivalence should be taken together with and authorised by the Greenpeace International Global Textile Procurement Working Group

4. Responsibilities and Monitoring

It is the responsibility of the relevant Budget Holder to observe the purchase requirements and to carry out an annual check that the Contracted Supplier meets (or continues to meet) the requirements of the standard.

The Budget Holder shall provide a copy of all relevant documents of compliance to the Greenpeace International Global Textile Procurement Contact.

It is the responsibility of Greenpeace International Global Textile Procurement Working Group/Helpdesk to:

- a) oversee the monitoring of standards, including on a regular basis review the equivalence of any other certifications that are relevant;
- b) collect and organise all relevant documents of compliance necessary for an eventual 2020 review (until December 2020 at least); and
- c) provide assistance and information to the Budget Holder responsible for implementing this standard.

The responsibilities above will be reviewed (and if necessary revised) by April 2020.

8. Validity and Revision status

This is a trial standard and will be reviewed by GPI with inputs from the global NRO Community of Practice at the end of 2019 / first trimester 2020.

For more information, please contact the Greenpeace International Global Textile Procurement Contact: textiles-procurement.int@greenpeace.org

**Greenpeace International
Ottho Heldringstraat 5
1066 AZ Amsterdam
The Netherlands
Tel: +31 20 7182000**

www.greenpeace.org

Annex 1: Definitions

| | |
|---------------|---|
| Budget Holder | The person responsible for managing the Textile Products procurement budget and for internal authorisation of any expenditure from that budget. |
|---------------|---|

| | |
|--|--|
| Contracted Supplier | The supplier, or its delegated party or trading partner, which delivers the final product to Greenpeace. |
| Detox | Refers to Greenpeace's Detox campaign, see Introduction. |
| DETOX TO ZERO by OEKO-TEX® "Status Report" | DETOX TO ZERO by OEKO-TEX® is a tool for manufacturers in the textile chain to assess, and document, the status of their chemicals management systems and the quality of their wastewater and sludge. The findings of the DETOX TO ZERO by OEKO-TEX® assessment are reported in a Status Report. |
| Equivalent | Any audit or certification tool, or customized agreements set up with third parties, are assessed by GPI to be "at least equivalent" by meeting the same ambition and requirements as those laid down in this policy. |
| Facility/Facilities | Any individual mill/factory in the manufacturing supply chain of the Textile Products. |
| GPI | Greenpeace International (or Stichting Greenpeace Council); a foundation incorporated under the laws of the Netherlands, being the co-ordinating body of Greenpeace. |
| Greenpeace Requirements | The requirements of Greenpeace regarding the supply chain Facilities and the Textile Products, to be assessed and reported by OEKO-TEX®. These requirements are set out in an Agreement between GREENPEACE and OEKO-TEX® on customised CHEMICAL AUDITING AND PRODUCT TESTING REQUIREMENTS FOR PROCUREMENT OF Greenpeace TEXTILE PRODUCTS – AUDITING BY OEKO-TEX®, attached to this policy in Annex 3 . |
| Hazardous Chemicals | For the implementation of this policy, all chemicals as referred to in the Manufacturing Restricted Substances List (MRSL) as covered by the DETOX TO ZERO by OEKO-TEX® GUIDELINE MRSL, an example of Detox best practice. ⁹ |
| Letter of Overall Compliance | A letter of overall compliance issued by OEKO-TEX® which will summarise the combined PASS/FAIL status or compliance for all the relevant Wet Process supplier Facility/ies (in the case that processes are undertaken at several separate locations) and the final Textile Products, indicating a PASS on both the testing of raw/untreated Waste Water of the supplier Facilities and of the final Textile Products. A FAIL on any of the Greenpeace Requirements single criteria is an overall FAIL. |

⁹ The DETOX TO ZERO by OEKO-TEX® Guideline MRSL is publicly available at: https://www.oeko-tex.com/en/business/certifications_and_services/detox_to_zero/detox_to_zero_start.xhtml

| | |
|------------------------------|--|
| Natural Fibres | <p>Includes:</p> <ul style="list-style-type: none"> • vegetable, or cellulose-based fibres such as cotton, flax/linen, hemp, and jute; • animal, or protein-based, fibres such as wool, mohair, and silk. <p>It excludes fibres from a natural source which are subjected to polymerisation eg. viscose from bamboo or wood.</p> |
| NROs | National/regional offices of Greenpeace. |
| Reusable Packaging System | Packaging that is constructed of durable materials and is designed to achieve multiple uses in its existing form without any physical or chemical modification and is refilled or used for the same purpose for which it was conceived. To qualify as reusable, there needs to be a reuse system in place that ensures it is reused in practice where the item is placed on the market. Such a system for reuse should be able to prove a significant actual reuse rate. |
| Subcontractor | Companies/suppliers of the Contracted Supplier, further down the Supply Chain (see Supply Chain Description). |
| Supply Chain Description | The details of the overall chain of operations used for the manufacturing of each Textile Product to be ordered by Greenpeace. This includes all steps from the supply of the raw materials to the assembly of the final product, for each company and Facility supplying the Textile Product. It includes details of location, contacts, operations (including Wet Processes),(see Annex 2). |
| Textile Products | Textile Products refers to all textile products that can be sold as merchandise, for gifting, or that are being used by volunteers, activists, crew or staff within the organisation or on board Greenpeace ships. |
| Wet Processing/Wet Processes | The textile fabric manufacturing processes that are carried out using water, which usually covers pre-treatment, washing, dyeing, printing and finishing. Wet processes use the most chemicals and generate wastewater. |

Annex 2: Supply Chain Description Form

See below. This will be provided as an Excel sheet attachment to the contracted supplier.

| Name of company completing form: | | Address: | | Contact person: | | E mail | |
|----------------------------------|---|--|---------|---------------------|---------------------------------|--|---|
| | | | | | | | |
| A | B | C | D | E | F | G | H |
| Number | Company name (or affiliate) - each facility | All operations performed in this facility (see list below) | Country | Full postal address | Contact person (name and email) | Does it involve a wet process* generating wastewater? yes/no | Existing valid certification**/audit (fill in which and date of delivery) |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

| INSTRUCTIONS | |
|--|--|
| Fill in all steps of the supply chain in chronological order of manufacturing facility, starting from the raw material supplier down to your company | |
| Column A: add a number once table has been filled in to facilitate the use of this table | |
| Column B: provide the precise affiliate company name of the facility | |
| Column C: describe all the types of operation performed in this facility | types of operation (not exhaustive) |
| | <i>raw material supplier - eg the farmer, or the trader, or the ginner</i> |
| | <i>spinning</i> |

| | |
|---|--|
| | <i>knitting-weaving</i> |
| | <i>Making-up, cut & sew, assembling</i> |
| | <i>singeing</i> |
| | <i>desizing</i> |
| | <i>scouring</i> |
| | <i>bleaching</i> |
| | <i>mercerizing,</i> |
| | <i>dyeing,</i> |
| | <i>washing</i> |
| | <i>printing</i> |
| | <i>finishing</i> |
| Column D: specify the country of operation for this facility | |
| Column E: provide full postal address of the facility | |
| Column F: provide email and name of the person in charge | |
| Column G: answer YES or NO according to the following list | * Types of wet processes for example : singeing, desizing, scouring, bleaching, mercerizing, dyeing, washing, printing |

| | | |
|---|---|--|
| <p>Column H: provide any relevant certification or verification - including those required by Greenpeace Trial Standard and any other 3rd party (or State) certification/verification the company would like to communicate (eg. ISO 14001). Provide details of the date of certification and its validity</p> | <p>** social and environmental certifications, for example</p> | |
| | <p>Social/ fairtrade certifications/ systems</p> | <p>Environmental /chemical management certifications/ systems</p> |
| | <p>GOTS v.5 Section 3</p> | <p>GOTS</p> |
| | <p>BSCI</p> | <p>OEKO-TEX</p> |
| | <p>FairWear</p> | <p>Bluesign</p> |
| | <p>BioRe (India and Tanzania) in "bioRe® Sustainable Cotton</p> | <p>BioRe organic cotton" in "bioRe® Sustainable Textiles</p> |
| | <p>Fairtrade textile programme (raw materials)</p> | <p>ISO 14001</p> |
| | <p>Chetna Organic (India)</p> | |
| | <p><u>OBEPAB Project (Benin)</u></p> | |
| | <p><u>La Siesta (Colombia)</u></p> | |
| | <p><u>Sekem Cooperative, Egypt</u></p> | |
| | <p>SA8000 Social Accountability Certification</p> | |

Annex 3: Agreement between Greenpeace and OEKO-TEX®

Agreement between GREENPEACE and OEKO-TEX® on customized CHEMICAL AUDITING AND PRODUCT TESTING REQUIREMENTS FOR PROCUREMENT OF Greenpeace TEXTILE PRODUCTS – AUDITING BY OEKO-TEX®.

The following is the agreement between Greenpeace and OEKO-TEX® concerning the customized procedures and requirements for auditing suppliers and products for procurement of Greenpeace textile products, when using OEKO-TEX® Standards and Reports (Standard 100 by OEKO-TEX® and DETOX TO ZERO by OEKO-TEX®).

These requirements are designed to meet the Greenpeace Global Textile Procurement Trial Standard version December 2019 (see above). They are time limited and are intended to be reviewed at a future date, before April 2020.

Requirements:

The requirements specified below include a facility analysis according to DETOX TO ZERO by OEKO-TEX® in order to assess the quality of the wastewater (and sludge where applicable) and the status of the chemical management system. Additional requirements for wastewater (and sludge where applicable) and MRSL compliance need to be met.

The product should be certified according to STANDARD 100 by OEKO-TEX® and meet additional analytical requirements.

The results will be summarized in a letter of overall compliance issued by OEKO-TEX® with an overall PASS/FAIL statement (see 3).

1. Facility analysis using DETOX TO ZERO by OEKO-TEX®

For the facility analysis a DETOX TO ZERO by OEKO-TEX® status report will be generated as per normal procedure.¹⁰ Additionally the requirements for wastewater (and sludge where applicable) and MRSL compliance need to be met. Independent of whether the facility has a wastewater treatment plant or not, the relevant sample for assessing exceedances of Reporting Limits is always to be taken before treatment (ie. the `raw`, or untreated wastewater).

1.1. Exceedances of Reporting Limits for wastewater, within DETOX TO ZERO (DTZ) by OEKO-TEX®

¹⁰ Guideline DETOX TO ZERO by OEKO-TEX®
https://www.oeko-tex.com/media/oeko_tex/...1/DETOX_TO_ZERO_Guideline_EN.pdf

The transitional exceedances of DTZ Reporting Limits for factory raw/untreated wastewater of the “original 11 priority hazardous chemical groups”¹¹ and the so called “beyond 11 groups” (see hazardous chemical groups highlighted) are detailed in the following table.

| TABLE 1: Greenpeace Requirements for factory raw/untreated wastewater discharge based on DETOX TO ZERO by OEKO-TEX® | | | | | | |
|---|--|--|--------------------|-----------------------------|---|--------------------|
| Chemical group category | Chemical group or chemical | PASS = Non-Detect (ND) / OR factor above DTZ Reporting Limits (RLs)* | Chemical specifics | DTZ Reporting Limits (µg/L) | Green-peace requirement (exceedance limit) (µg/L) | Other requirements |
| <p>* No exceedance of the DTZ Reporting Limits (RLs) unless otherwise specified. Where specified, a factor refers to factor above DTZ RLs</p> <p>** Where reporting limits for specific chemicals differ, refer to the OEKO-TEX® DTZ MRSL (see footnote 1)</p> <p>*** 6 VOCs have a DTZ RL of 50µg/L (see DTZ MRSL): for these 6 chemicals the Greenpeace requirement is 100µg/L, as listed in column 6.</p> <p>**** See best practice conditional exemptions below, for facilities using polyester</p> | | | | | | |
| Heavy metals - priority | Cadmium (Cd), lead (Pb) | = less than a factor of 10 | Cd | 0.1 | 1 | |
| | | | Pb | 1 | 10 | |
| | Mercury (Hg), chromium VI (CrVI) | = ND | Hg | 0.05 | 0.05 | |
| | | | CrVI | 1 | 1 | |
| Heavy metals - other | Total chromium (Cr), arsenic (As), copper (Cu), nickel (Ni), antimony (Sb), cobalt (Co), zinc (Zn), manganese (Mn) | = align with the ZDHC “aspirational” levels, with the addition of Mn limit of 250 µg/l ¹² | Total Cr | 1 | 50 | |
| | | | As | 1 | 5 | |
| | | | Cu | 1 | 250 | |
| | | | Ni | 1 | 50 | |
| | | | Sb | 1 | 10**** | |
| | | | Co | 1 | 10 | |

¹¹ Greenpeace (2018), [Destination Zero](#), see Box 1 page 12.

¹² ZDHC guidelines do not include manganese, this is the level recommended by Greenpeace following a review of wastewater data published by several Detox brands.

| | | | | | | |
|---|--|--|-----------------------------|------------|------------|--|
| | | | Zn | 1 | 500 | |
| | | | Mn | 1 | 250 | |
| <p>Requirements on Organics ((10 priority groups below), apply up to 31st December 2020. After that date, requirements on these Organics will be Non Detect (ND) according to the RLs in latest OEKO-TEX DTZ MRSL, unless otherwise notified</p> | | | | | | |
| Organics 10 priority groups | Perfluorinated compounds (PFCs), Brominated/ Chlorinated Flame Retardants (B/CFRs), Organotins (OTs), Chlorophenols (CPs), Short/Medium chain chlorinated paraffins (S/MCCPs) Arylamines released from azo dyes (azo dyes) | = ND | PFCs (each) | 0.01 | 0.01 | |
| | | | PFCs volatile (each) | 0.1 | 0.1 | |
| | | | B/CFRs (each) | 0.05/0.5** | 0.05/0.5** | |
| | | | OTs (each) ¹³ | 0.1 | 0.1 | |
| | | | CPs (each) | 0.5 | 0.5 | |
| | | | S/MCCPs | 0.4 | 0.4 | |
| | | | Azo dyes | 0.1 | 0.1 | |
| | Alkylphenols (APs) and alkylphenol ethoxylates (APEs), Chlorinated solvents (C solvents) | = less than a factor of 5 per individual chemical | <u>APs</u> NPs OPs | 1 1 | 5 5 | Any detect of more than 3 groups is a FAIL (APs/APEs counts as a single group) OR Any detect of more than 5 individual chemicals in any group is |
| | | | <u>APEs</u> NPEs OPEs | 1 1 | 5 5 | |
| | | | Sum of all APs +APEs | - | 10 | |
| | | | C solvents (each) | 1 | 5 | |
| | Phthalates, Chlorobenzenes (including chlorotoluenes) (CB/Ts) | = less than a factor of 10 per individual chemical | Phthalates | 1 | 10 | |
| | | | CB/Ts | 0.02 | 0.2 | |

¹³ Greenpeace is discussing with OEKO-TEX® the possibility that this reporting limit could be revised downward in the future.

| | | | | | | |
|---|---|--|-----------------------|--------|--------|---|
| | | | | | | a FAIL |
| Organics Beyond 10 organic priority groups | Benzene & certain alkyl derivatives (toluene, xylene, styrene, ethylbenzene) | = less than factor of 5 per individual chemical | Benzene & derivatives | 1 | 5 | Any detect of more than 5 individual chemicals in any group is a FAIL |
| | Dimethylformamide (NN-DMF) | = less than factor of 5 | NN-DMF | 1 | 5 | |
| | Polycyclic aromatic hydrocarbons (PAHs) | ND - per individual chemical | PAHs | 1 | 1 | |
| | all other "beyond 10" organic priority groups on DTZ list ie. -Other Volatile Organic Compounds (VOCs)/solvents, - Carcinogenic dyes (CMR dyes), - Allergenic disperse dyes (AD dyes), - Other flame retardants (other FRs) (except boron oxides and antimony trioxide, for which no waste water testing is required) | = less than a Factor of 100** per individual chemical. | Other VOCs | 1/50** | 100*** | |
| | | | CMR dyes | 50 | 0.1 | |
| AD dyes | | | 0.1 | 10 | | |
| Other FRs | | | 0.5 | 50 | | |

Any exceedance of Greenpeace requirements in the table above would mean a FAIL, apart from conditional exemptions detailed below.

Best practice conditional exemptions for specific cases

Conditional exemptions for exceedances of the Greenpeace requirements are only permitted for facilities where the DETOX TO ZERO Status Report score for wastewater is 95% or above, and for chemicals that are not from one of the 10 priority Organic groups or priority Heavy Metals.

Conditional exemptions are only permitted if there is a plan to investigate the source of the exceedances of the Greenpeace requirements and take corrective steps ("corrective action plan" with timeline), to report and review at the next wastewater testing. The facility's corrective action is to be attached to the Letter of Compliance (see 3).

Conditional exemptions are only allowed for the following specific cases:

- For antimony, where found in wastewater from a facility that is also processing polyester, the permitted exceedance is up to 50 ug/l. The facility's "corrective action plan" must include at least:
 - a) verifying the levels of extractable antimony in polyester supplies, based on Standard 100 Appendix 6 (either self testing, as per requirements in section 2, or requiring equivalent information from the raw material supplier), and
 - b) a commitment and a schedule to transition to antimony-free polyester in the next 1-3 years

Any subsequent best practice conditional exemption from exceedance levels for any other chemical or chemical group, would be set based on Greenpeace's internal assessment.

Organics & Heavy Metals in sludge

- a. When the facility has its own wastewater treatment plant, the DTZ audit includes the testing and sampling of all DTZ groups in sludge - priority and non priority
- b. No PASS/FAIL factors or levels set
- c. Timebound approach - collect data on sludge levels, to be assessed in future. A solution for setting any levels and corresponding scope will need to be explored/resolved based on ongoing observations and experience eg from OEKO-TEX® and from data gathered as a result of future DTZ auditing or comparable facilities data

It should be noted that specifically for sludge some of these "beyond 11 priority groups" substances may not be possible to test at the reporting limits in the DTZ list due to technical limitations. For these substances, the supplier will test at technically feasible limits and OEKO-TEX® will check the justification for any deviation from the DTZ by OEKO-TEX® MRSL and the reasons given.

1.2. Chemical Inventory

If the chemical inventory is not in compliance with the DETOX TO ZERO by OEKO-TEX® MRSL (100% in the Status Report), regarding the USE of the "original 11 priority hazardous chemical groups", it is a FAIL.

1.3. Implementation progress over time

In cases of exceedances (of Reporting Limits or factors set out above) OEKO-TEX® will make recommendations on the corrective steps to be taken and assess what implementation progress has been made on recommendations from previous audits which were highlighted in previous DTZ Status Report (triggered by any exceedances).

The recommendations MUST require identification of the source of the hazardous chemicals which exceeded their Reporting Limits (as far as possible) – this should include the examination of raw materials, transport, storage, other sources of cross contamination - and how they must be followed up. If recommendations from previous audits exist and no implementation progress has been made (for example no serious documented efforts to identify the source as far as technically possible), this would mean a FAIL.

2. Product testing within Standard 100 by OEKO-TEX® Annex 6 - `baby`

For product testing, OEKO-TEX® tests and audits products for Standard 100 Annex 6 (I Baby)¹⁴ as per normal procedure, plus **(as a customized service for Greenpeace procurement)** additional testing to Standard 100 Annex 6 (I Baby) according to the agreed tighter limits on the 3 substances as indicated below (see table). Any exceedance would mean a FAIL. A statement to verify compliance with the Greenpeace requirements will be included in the letter of overall compliance (see 3).

¹⁴ STANDARD 100 by OEKO-TEX®, see Limit Values and Individual Substances According to Annexes 6 & 7 https://www.oeko-tex.com/en/business/certifications_and_services/ots_100/ots_100_start.xhtml

TABLE 2: ADDITIONAL PRODUCT TESTING REQUIREMENTS

| Key chemical | OEKO-TEX® Standard 100 (V_2019) Annex 6 (I Baby) Limits | Limits for Greenpeace Procurement |
|-----------------------------|--|--|
| APs/APEs | 5/50 mg/kg | 2/2 mg/kg |
| PFOS/PFOA | Report limits in µg/m ² | Also to be reported in «mg/kg» |
| PFCs (apart from PFOA/PFOS) | 0.025 mg/kg | 0.01 mg/kg |
| PFCs – FTOHs/FTA | 0.25 mg/kg | 0.2 mg/kg |
| Phthalates | Each Phthalate: 100 ppm Sum of all: 250 ppm (only tested in coated articles, plastisol prints, flexible foams, and accessories made from plastics) | 30 mg/kg for individual phthalates (tested in all materials of the product, not limited to testing of coatings, foams, plastics) 250 mg/kg sum |

3. Letter of compliance, transparency, timing of testing and frequency of audits

- A single **letter of overall compliance** by OEKO-TEX® to the client (Greenpeace contracted supplier) would combine the wastewater/sludge findings, the MRSL compliance for all the relevant facilities (in the case that processes are undertaken at several separate locations) and the product compliance, according to the requirements above in points 1 and 2, and give an overall conclusion of PASS/FAIL.
- OEKO-TEX® will verify wastewater/sludge testing data according to the requirements of its DTZ by OEKO-TEX® Guideline (annual check including wastewater data). In the case where there is

more than one wet process supply chain facility, the names and addresses will be communicated to OEKO-TEX by the contracted supplier (see Annex 2, Supply Chain Description). The PASS/FAIL conclusion of the DTZ analysis in relation to Greenpeace's requirements needs to be summarised in the OEKO-TEX® DTZ Status Report/or in a letter of compliance, for each client.

- To support Greenpeace policy on transparency OEKO-TEX® would work towards future full disclosure via OEKO-TEX® website (e.g. via OEKO-TEX® Buying Guide) of:
 - 1 - full DTZ Status Report (for each audit and intermediate audits/spot checks)
 - 2 - full laboratory testing reports for discharges and product with detection levels and methodologies and location and timing of samples
 - 3 - any letters of compliance
- DTZ analysis, Standard 100 product test and assessment of Greenpeace requirements are carried out annually. The letter of compliance will be valid for 12 months for all Greenpeace procurement from the date of the letter.