



Organic Content Standard 3.0 Feedback Summary

Published May 11, 2020

This document has been prepared to provide a summary of the comments received during the Public Stakeholder Review of the Organic Content Standard. It includes a summary of all comments received - related to the revision - the general response to the feedback, and how the issues were addressed. A full list of all comments received is available upon request.

Open Feedback Period: April 2 – May 4, 2019

Draft Consultation Period: October 8 – December 8, 2019

1. Participation

In total, 16 stakeholders participated in the Public Stakeholder Consultation. These comments came mostly from Brands and Retailers, Certification Bodies & Standard (Professional Services), and Supply Chain users of the Standard. Additional comments were also collected from the academic community and a commercial tracing provider.

Total number of stakeholders: 17

- Brands/Retailers: 3
- Supply Chain: 8
- Professional Services: 3
- Civil Society: 3

Stakeholders from the following regions participated:

- Asia: 8
- Europe: 5
- North America: 3
- Unknown: 1

The feedback from the Consultation was predominantly from the Supply chain and Professional services sector in Asia. Asia is a key region in manufacturing and certification. There were a few comments from Europe, which is a key region in the sales of Organic Content Standards.

We did not receive any feedback from raw material producers (organic input providers).



2. Analysis of Comments Received During the Public Stakeholder Consultation

The comments received during the Public Stakeholder Consultation were related to GMO testing, additional fiber requirements, labeling and packaging materials requirements, and segregation of goods.

Key challenges exist at the farm level and between farm to the first point of entry. Such as, a few countries do not issue transaction certificates from the farm to the first processor. And many traders are involved between farm to ginning (in case of Organic Cotton). These and other factors may lead to fraud and lack of transparency.

Scope of chemical restriction & social compliance

Currently, the Organic Content Standard does not address the use of chemical & social compliance during processing. We received a comment that the Standards should not only certify fabric or other organic material as “Organically Grown,” but also include chemical restrictions & social compliance.

Labels, hangtags, & packaging materials requirement

We received a comment that Certified Organic finished product content labels, hangtags, and packaging materials should have a specific requirement: “All material must be from sustainable sources and produced using clean energy. For example, product labels & tags must be organic fabric instead of synthetic fabric, and packaging must be made from FSC/PEFC or recycled materials (GRS/RCS).”

OCS 100 & OCS Blends – Other fiber requirements

OCS 100 & OCS Blends allows using 5% to 95% of other fiber, respectively. We received comments suggesting that OCS provides requirements for the additional materials, such as from a more sustainable source (e.g., BCI instead of conventional cotton, recycled polyester instead of virgin polyester).

Determination of Stable nitrogen isotope ratio in cotton fibers (ISO 20921:2019)

ISO 20921:2019 testing method determines the isotope ration in Cotton fiber & Soil. It was suggested that this would help to understand if cotton fiber is organically grown or not. Specifically, what kind of fertilizer was used during cotton fiber cultivation (i.e., organic fertilizer or synthetic fertilizer).

Segregation of OCS goods

Segregation is a very important step in managing OCS products during production and storage. There was a suggestion to have more robust guidelines as an explanation for suppliers or producers.

Ginning Units certification under OCS & GOTS

Currently, gins shall not be certified to both GOTS & OCS. It was suggested that the OCS allow the certification of gins under OCS as well as GOTS. It was also suggested that GOTS accept OCS TC for further processing steps. It should be noted that this last statement is outside the scope of the OCS revision, as it relates to GOTS.

OCS and GOLS (Global Organic Latex Standards)

It was suggested to merge the Global Organic Latex Standards with OCS.



OCS logo

OCS has two logos, OCS 100 and OCS Blended. It was suggested that the two logos create lots of issues. The commenter suggested that OCS have one logo and use the accompanying language below the logo to distinguish different types of claims. This type of claim is also done by GOTS.

GMO Testing Equipment

GMO testing equipment is now available to test organic cotton to ensure the purity of materials. It was suggested that such a guideline be included in OCS.

GMO testing protocol

ISO International Working Agreement 32 (IWA 32) has published the best method for screening of genetically modified organisms (GMOs) in cotton and textiles. We received feedback that this should be included in OCS as ISO testing protocol gives uniformity in testing results across the world.

The first point of entry (without TC)

Over some time, certification bodies have reported that few countries do not have the policy to issue Transaction certification under organic as well as— conversion production. We received a comment that we should adjust the language to address this difficulty for farmers.

Input requirement at the first point of entry

Over some time, certification bodies have reported that first input TC is not naming the farmers as sellers, but instead is always in the name of traders. Between farmers and Ginners, at least two traders are involved, and this creates the issue of volume reconciliation between farmers and ginners. It has been suggested that the first point of entry (example – Cotton Ginning units), should have scope certificates of the farm with or without Transaction certificates as input requirements for verification.

Separate Transaction certification for multi-standards.

It was suggested that customers demand separate transaction certificates for a product made from Organic and recycle content and that OCS should allow such requests.

Marketing & Awareness of OCS

One comment suggested that OCS is not known very well by brands & retails compared to another organic standard.



Reference	Commented text	Proposed Change	Comment (justification for change)
Not specific	Not focused on any specific wording,	The standard should not certify fabric or other organic material as just "organically grown".	This is a low standard that allows for the materials to be treated with toxic chemicals and flame-retardant chemicals, the still be able to display an "organic" certification logo.
Out of the Scope: OCS Terms of reference – OCS is only for Organic content claim and not processing the claim.			
Not specific	Add complete testing to the requirement.	Testing equipment is now available to test organic cotton to ensure that there is not GMO genes included. Proof of pure organic cotton should be part of the requirement.	
Accepted: Policy on the GMO Screening of Organic Cotton is now added as a mandatory requirement in OCS 3.0. IWA 32:2019 is testing methods that need to be used. It is part of the OCS 3.0 User Manual and Certification Procedures.			
		We are a manufacturer of labels, tags and packaging from sustainable sources and clean energy. The garment that is produced may be organic, but there is certification method or sources for raw material of labels used in the garment. If you look at it the neck label often comes in direct contact with the skin, also trims are the easiest way to change to organic as it is independent of the garment fabric supply chain. And the cost difference is not much. It may look like a miniscule portion of the garment, but when looked at we produce millions of labels a month for various brands. What if all the raw material could be achieved from a sustainable source?	
Out of the Scope of OCS: Labels, tags & packaging are considered as trims & accessories. OCS Terms of reference is about a content claim and not mandatory requirement around labels, tags & packaging. Such a product can get separate OCS certification, but all labels, tags, and packaging material used cannot be OCS or GOTS certified. Such mandatory requirements will be heard to achieve the OCS goal.			
Labeling guide for OCS certified goods(1) A. « OCS 100 » # labeling rules	Labeling guide for OCS certified goods(1) A. « OCS 100 » # labeling rules, Requirement: 2. Labeling guide for OCS certified goods(1) A. « OCS 100 » # labeling rules material means the used organic raw material (for sample: cotton) X: indicate the exact composition percentage of organic raw material (between 95 & 99%). The percentage reflects the final blend.,	In the OCS 100% minimum requirement is 95% organic fibres & balance 5% other fibres . In the balance up to 5% if you allow only recycled polyester instead of virgin polyester or other recycled fibers then product would be more sustainable., Comments: In OCS blended already so much of flexibility are given for the composition of fibres so that if you make little stringent in OCS 100 at least we can maintain more sustainability. This could possible to implement in OCS blended as well so that demand for RCS & GRS certification will increase in market.	In OCS blended already so much of flexibility are given for the composition of fibres so that if you make little stringent in OCS 100 at least we can maintain more sustainability. This could possible to implement in OCS blended as well so that demand for RCS & GRS certification will increase in market.
Out of the Scope of OCS: OCS minimum contain 5%: Putting additional fiber & material requirement will be interference for to OCS goal.			
			As a convener of WG 31 Natural material for textiles, which is established and operated



			<p>within the ISO / TC 38 Textile committee (https://www.iso.org/committee/48148.html), I've convened on projects to be published as ISO international standards.</p> <p>In WG 31, we have developed new ISO international standard ISO 20921: 2019 Textiles – Determination of stable nitrogen isotope ratio in cotton fibers (https://www.iso.org/standard/69461.html) which is the analysis method can confirm the organic cotton by instrumental analysis.</p> <p>By applying this analytical method, we can obtain information that can estimate whether fertilizer is applied by identifying nitrogen isotopes for clothing products.</p> <p>Therefore, it is expected that this method will be introduced in Textile Exchange to provide consumers about more reliable information of organic cotton and to protect organic cotton producers.</p>
<p>Accepted: ISO 20921:2019 Textile – Determination of stable nitrogen isotope ratio in cotton fibers can be used to determine whether the cotton was organically grown. It is part of the OCS 3.0 User Manual.</p>			
Implementation Manual,	Section A: add a NEW paragraph on --Segregation requirements in production lines.	Explain the requirements for factories on segregation and different scenarios e.g.: mix packs products- how to handle product and pack.	Suppliers are not given enough guidance for production line scenarios before audits.
<p>Accepted: Section D – Chain of Custody has more clear information about Segregation under OCS and additional reading material in CCS.</p>			
A 2.1b	Gins shall not be certified to both GOTS and OCS. If a gin is certified to OCS and want to be certified to GOTS it shall contact its responsible CB to terminate its OCS Scope Certificate prior to the GOTS scope certificate issuance.	Gins can be certified to both GOTS and OCS if a gin have same CB for OCS and meet social requirement of GOTS.	<p>If a gin is maintaining GOTS and OCS both requirement can obtain both certificate it will help for other to compare certification charges and use more competitive one!</p> <p>Since GOTS required compliance requirement for all supply chain can also consider to accept OCS Tc for issuing GOTS TC at Garment export level.</p> <p>--</p> <p>Since OCS is accepting GOTS certified fiber for textile processing which is include spinning weaving manufacturing if OCS only add social requirement at GIN level i think OCS TC would also acceptable for GOTS too,</p> <p>It has been notice that during textile process some of textile unit have issue ocs TC to garment manufacturer and garment producer have only GOTS certification and later CB is not accepting OCS Tc of raw material i.e Fabric for issuing Garment GOTS TC to end buyer</p>
<p>Accepted: The first processor can have OCS & GOTS Scope certificate. Added in Section B1.1</p>			
			I suggest that the Organic Content Standard and the newly gifted Global Organic Latex Standard be merged. This will help to streamline sustainability messaging and prevent the further proliferation of standards.
<p>Out of the Scope of OCS: At the moment, OCS & GOLS are two separate standards. At the same time, the GOLS goal is different compare to OCS. However, all non-food product is accepted under OCS, meaning latex can be directly certified under OCS, and we do not need GOLS.</p>			
	We produce fabric made from organic and recycle content. So, our customers (brands) demand the transaction certificate for these two contents, separately. It is not possible right now but you should find a way for this burden.		
<p>Out of the Scope of OCS:</p>			



Textile Exchange has Multiple Standards TC policy (existing policy). Kindly use the same. Only 1 TC can have OCS & RCS / GRS certified products.			
	<p>OCS is easier to handle by a facility but the reason GOTS is being preferred is because of the traceability between supply chain but also because it considers a social audit aspect. Meanwhile GOTS has done a better marketing due to which clients knows the GOTS certification and less the OCS. So if client asks GOTS it's harder offer OCS</p>		
<p>Out of the Scope of OCS: As per OCS terms of reference Social, Chemical, and Environment is out of the scope. OCS is a content claim and not a product claim standard.</p>			
B4.2	<p>Supply Chain Certification (As New added Text)</p>	<p>Compliance with International Labor Standards setting out basic principles for rights at work including the issues of Compliance with International Labor Standards setting out basic principles for rights at work including the issues of forced labor, minimum wage, child labor etc.</p> <p>(If setting more detailed criteria) Criteria: 1.CHILD LABOR 1.1 The organisation shall not engage in or support the use of child labor as defined above. 1.2 The organisation shall establish, document, maintain and effectively communicate to personnel and other interested parties, written policies and procedures for remediation of child laborers, and shall provide adequate financial and other support to enable such children to attend and remain in school until no longer a child as defined above. 1.3 The organisation may employ young workers, but where such young workers are subject to compulsory education laws, they shall work only outside of school hours. Under no circumstances shall any young worker's school, work and transportation time exceed a combined total of 10 hours per day, and in no case shall young workers work more than 8 hours a day and may work during night hours. 1.4 The organisation shall not expose children or young workers to any situations – in or outside of the workplace – that are hazardous or unsafe to their physical and mental health and development forced labor, minimum wage, child labor etc.</p>	<p>Refers to ILO International Labor Standards and its 8 fundamental Conventions, and OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector in 2018. It is also related to SDGs Goal 8: Decent Work and Economic Growth.</p> <p>As an organization working to eliminate child labor issue in cotton field and implementing organic cotton project in India with Kowa, we propose the above changes are needed.</p>
<p>Out of the Scope of OCS: As per OCS terms of reference Social, Chemical, and Environment. OCS is a content claim and not a product claim standard. Kindly participate in CCS revision. We will address the social issue in CCS.</p>			