

GRS/ RCS 4.0 Open Feedback Period

A Summary of Feedback Received

September 2021

Introduction

Textile Exchange is committed to building credible, internationally recognized standards that include assurance and monitoring and evaluations systems. As a member of ISEAL, Textile Exchange follows three [Codes of Good Practice in](#) addition to its own procedures for Standard Setting, Accreditation and Certification.

The Global Recycled Standard (GRS) and Recycled Claim Standard (RCS) are international, voluntary standards that set requirements for third-party certification of recycled input and chain of custody. The shared goal of the standards is to increase the use of recycled materials. The GRS includes additional criteria for social and environmental process requirements and chemical restrictions.

In April and May 2021, Textile Exchange collected feedback on the current version of the Global Recycled Standard 4.0 and Recycled Claim Standard 2.0. This document provides a summary of feedback received during the open feedback period. We will research the issues submitted during the Open Feedback Period. Revision of these standards will be rolled into Textile Exchange's transition to a unified standards system, including verification of recycled materials. You can learn more about the Standards Transition [here](#).

Stakeholder Participation

In total, 55 stakeholders participated in the Open Feedback Period.

Total number of Stakeholders:

- Brands/ Retailers: 12
- Supply Chain: 17
- Raw Material Products: 5
- Professional Services: 20
- Civil Society: 1

The open feedback period spanned over 61 days from April 1st - May 31st, 2021.

Stakeholders from the following regions participated: Austria, Bangladesh, Canada, China, Denmark, Estonia, France, Germany, India, Italy, Japan, Netherlands, Spain, Sweden, Switzerland, Turkey, UK, and United States.

Summary of Comments Received by Theme

The GRS and RCS are amongst the leading standards to track recycled material through the supply chain. They were written with the textile industry in mind, but we see an increase in application across product categories, inside and outside the textile industry. With this revision we want to ensure that our recycled standards remain relevant in tracking recycled material through supply chains.

An overview of the comments received during the Open Feedback Period is provided below, grouped by theme and whether it is in or out of scope for this revision.

In-scope Feedback Received

Combined GRS/RCS Feedback

1. General

- a. Replace the word “Recycled” with “Circular Economy” in the standard names.

2. Scope

- a. Add requirement to start the chain of custody at the original source of the reclaimed material.
- b. Certification of non-textile products (e.g. packaging).
- c. Add details on allowed material compositions.
- d. Add clarity on the differences between “RCS 100” and “RCS Blended”.
- e. Reduce GRS labeling recycled content requirements from 50% to 20% recycled content.
- f. Add clarity to what types of products (e.g. non-textile) can have component certification to GRS to A3.1a and A3.1b.
- g. Clarify the difference between certified main materials and accessories and trims (e.g. mattress topper).

3. Definitions

- a. Add a definition for “Ocean Bound Plastic”.
- b. Add clarity to the definition of “Material Recycling”.
- c. Add a definition for “Upcycled”.
- d. Add a definition for “Second Quality”.
- e. Add a definition for “Aged Product”.
- f. Add clarity to the definition of “Reclaimed Material”.
- g. Add a definition for “Pre-Consumer Waste”.

4. Country Specific Legal Requirements

- a. Add support by reducing barriers in use or scaling up use of pre and post recycled materials for countries that have little access to post-consumer garments where imports are the only option (e.g. Bangladesh).
- b. Acknowledge that Sweden's Extended Producer Responsibility (EPR) requires all households and businesses to separate textile waste from other waste which could affect the GRS.
- c. Acknowledge China's Comprehensive Working Hour System for GRS Social Requirements, which takes an average of working hours over a series of weeks.

5. Recycled Material Requirements

- a. General
 - i. Add a claim related to the reduction of the use of virgin material, rather than allowing the use of pre-consumer waste.
- b. Pre-consumer Waste
 - i. Include textile by-products (e.g. scraps) as an input.
 - ii. Recognize the environmental benefits of using textile by-products.
 - iii. Include materials that are normally identified as "claimed", "aged", or "unsold" to be used as a GRS input.
- c. Post-consumer Waste
 - i. Expand post-consumer waste to include Ocean Bound Plastics.

6. Tracking Reclaimed Material

- a. Propose to use a digital tracking system that verifies the source of waste generated and its movement along the supply chain.
- b. Add verification document and digital authentication of the data to provide comprehensive traceability of the chain of custody and details of the reclaimed materials.
- c. Remove the requirement to submit the exact content of the post-consumer material type coming in or going out of for a TC.
- d. Add guidance on how to exactly determine the material content percentages.
- e. Change A5.2b requirements to record material content percentages as an average.
- f. Change A5.2b requirements to record material content for each batch and/or certified product component.
- g. Add that accessories are not included in material content percentage requirements found in A5.2b.

7. Verifying Input Reclaimed Material

- a. Add a requirement to prove the source/feedstock of waste on the TC (e.g. yarn waste, plastic bottlers, or fabric scraps).
- b. Add guidance for CBs to determine/ test the origin of raw materials.

8. Reclaimed Material Declaration Forms

- a. Add additional information to the Reclaimed Material Declaration form including material composition, surface treatment, handling methods, and colors.
- b. Require declaration forms to be collected for every purchase.
- c. Remove shipment information from declaration forms.
- d. Require declaration forms for in-house recycling and pre-consumer material.

9. Accepted Equivalent Standards

- a. Propose for GRS to accept equivalent standards such as the International Sustainability and Carbon Certification (ISCC) plus, REDcert, EcoLoop, ISO 22095, ISO 308, and UL.
- b. Propose for GRS to accept equivalent standards for subcategories (e.g. social and environmental).
- c. Propose to add additional/complementary recycled standards and claims to the GRS that would allow specific certified inputs to be tracked and kept segregated throughout the supply chain.

GRS Only Feedback

10. Social Requirements

- a. Propose for GRS to accept equivalent social standards such as the SA-8000, Business Social Compliance Initiative (BSCI), Worldwide Responsible Accredited Production (WRAP), Sedex Members Ethical Trade Audit (SMETA), ISO 9000, and ISO 14000.
- b. Add anonymous reporting (e.g. chemical) options to protect employees.

11. Environmental Requirements

- a. General
 - i. Propose for GRS to accept equivalent environmental standards such as the Higg Index (e.g. FEM and FSLM), ISO 14001, bluesign, and ZDHC certification.
 - ii. Add a climate lens to the standard.
- b. Wastewater
 - i. Remove wastewater test report requirements for facilities who has a tertiary level Zero Liquid Discharge (ZLD) plant.
 - ii. Add clarity on which organizations need to meet wastewater requirements (e.g. ZDHC Wastewater Guidelines does not apply to fiber production).
 - iii. Add ZDHC Man-Made Cellulosic Fibers Guidelines to MMCF wastewater guidelines.
 - iv. Remove requirement that organizations must monitor and meet all relevant requirements related to wastewater for those who do not use water for the production process.
 - v. Add ZDHC's wastewater & sludge test report.

- vi. Add clarity to limit values for parameters listed in the Wastewater Parameter Limit Values in Appendix D.
- vii. Add clarity to wastewater measurement times (e.g. all operation time vs normal operation time).
- viii. Add guidance on wastewater measurement values (e.g. average, individual samples).
- ix. Increase the limit value for the temperature difference between wastewater and receiving water body.
- x. Allow limit values to be recorded in kg per ton.
- xi. Propose for national and/or local regulatory bodies to set the minimum requirements for testing methods.

12. Chemical Requirements

- a. General
 - i. Propose for GRS to accept equivalent chemical standards such as Bluesign.
- b. Chemical Management/ Record Keeping
 - i. Add testing (e.g. chemical) of incoming materials.
 - ii. Propose to make Safety Data Sheets (SDS) available in other languages commonly used by workers in facilities.
 - iii. Increase the Safety Data Sheet (SDS) updates to at least five years- certain policies do not allow updates more than every five years unless there are changes in composition.
 - iv. Add clarity to which organizations the ZDHC MRSL Conformance Guidance is applicable for (e.g. fiber producers).
 - v. Add clarity and guidance on fulfilling the needs for verification with the ZDHC MRSL Conformance Guidance.
 - vi. Add guidance on reporting MSDS for organizations with supplies that won't release their exact compositions (e.g. spinning oils) to prevent violating their IP rights.
 - vii. Add clarity to which chemicals need to be verified by the ZDHC MRSL Conformance Guidance (e.g. chemicals used for maintenance).
 - viii. Propose to add a risk-based approach integrated into chemical management alongside the MRSL of the ZDHC.

13. Restricted Chemical Substances

- a. Add restricted chemical exclusions for chemicals that have no substitution product available (e.g. DMAc (CAS 127-19-5) for elastance production).
- b. Add the requirement to exclude the substances classified as dangerous to human health and/ or the environment at the levels defined by reach.
- c. Add clarity to the main requirements of the use of chemicals that may be used in the production of GRS products (D2) to limit different interpretations from CBs.
- d. Add clarity to the exclusion of substances and mixtures classified with particular hazard codes or risk phrases to limit different interpretations from CBs.
- e. Add a definition to "chemical formulation".
- f. Add a clear definition to which types of chemicals D2.2 and D2.3 apply to.

- g. Remove hazard codes for chemicals used in low amounts (e.g. bale ink (H304 and H411)).
- h. Propose that chemical formulations higher than level 1 ZDHC MRSL conformance do not need to be analyzed every two years unless the chemicals are changed.
- i. Add clarity that D2.1 and D2.2 in the GRS must be met only if ZDHC conformance certification is not available
- j. Add an approved chemicals list.
- k. Add clarity on approved input equivalents for ZDHC such as MTS CoC or Oeko-Tex Eco Passport along with what conditions these can be accepted.

14. Chemical Recycling

- a. Propose to explore piloting other approaches for chemical recycling, including mass balance.
- b. Add clearer guidance for chemical processing (e.g. viscose from recycling).
- c. Propose for another method to prove reclaimed content if the chemical structure is changed by chemical recycling.

Out-of-scope Feedback Received

15. Scope

- a. Add a section to A3 on labeling with more details, including who can label, approval processes, and labeling releases.

Textile Exchange response: This feedback is outside of the scope of the standards revision and could be addressed in updates to the Claims Policy.

- b. Add procedures to prevent the commingling or substitution of the claimed material with other materials and/or products.
- c. Add a group certification process option for the GRS standard.
- d. Add mass balance as an approved chain of custody model.
- e. Address mass balance in more detail.
- f. Add clarity on the requirements for each type of organization (e.g. trader).
- g. Remove certification requirements for all manufacturers of the same company with multiple sale offices where no product modification is done.
- h. Add information on what extent certain sites (e.g. storage sites) must be inspected for certification.
- i. Add requirements on “cross selling”.
- j. Remove requirements for traders and distributors to be certified.
- k. Remove TC requirements for sales from small traders to their clients.
- l. Add clarity to the transaction process, requirements, and documents for traders.

Textile Exchange response: This feedback is addressed in our Content Claim Standard (CCS), which is the foundation of all of Textile Exchange standards.

16. Recycled Material Requirements

- a. Remove reclaimed products from being considered recycled inputs.

Textile Exchange response: We already do not allow this in our current version of the standard. Reclaimed materials must be recycled to qualify.

17. Certification Process

- a. Add more specific information about the certification process (e.g. how long certifications are valid for).
- b. Add guidance/clarification/new requirements for auditors to make the certification process more consistent across all audits performed.
- c. Add more specific auditing control points (e.g. what needs to be presented and reviewed) for each criterion.
- d. Add requirement for material concentrators to apply for GRS certification.
- e. Add explanation and/or examples to GRS buyers setting further requirements for certified input materials to the GRS standard in A5.2e.

Textile Exchange response: The certification process and auditor guidance will be addressed as part of the certification procedures.

18. Transaction Certificates

- a. Reduce the complexity of the Transaction Certificate process by only requiring the submission of an incoming TC, mass balance documents, and outgoing documents.

Textile Exchange response: This feedback will be considered as part of digital innovations Textile Exchange is working on.

- b. Increase the unification and monitoring of TCs issued by Certification Bodies.

Textile Exchange response: This feedback will be addressed as part of digital innovations Textile Exchange is working on.

- c. Remove additives, such as Isophthalic acid (IPA) that is used for material formation as glue, from the composition of TC's.

Textile Exchange response: This information is currently not required on TCs.

19. Scope Certificates

- a. Reduce the number of production steps listed on SCs by making the differences between two similar production steps clearer (e.g. storing versus warehousing).

- b. Add information about whether the product can be labeled or not on the SC under label grade.

Textile Exchange response: This feedback will be included in the next revision of the SC Policy.

20. Labelling and Claims

- a. Add additional guidance on putting a logo on packaging that is not certified for products that are certified.
- b. Provide clarity on whether trims and accessories weight is calculated. The TC and SC policy states it is always exclusive. The GRS/RCS labeling guidelines states it may be calculated.

Textile Exchange response: This feedback will be included in the next revision of the TC Policy.

- c. Propose for logo to be through Textile Exchange only and remove CB requirement.

Textile Exchange response: This feedback will be considered as part of digital innovations Textile Exchange is working on.

- d. Propose for composition to be specified next to the article instead of in the logo.
- e. Add the option to use one logo for all GRS articles with the minimum % of recycled material listed as composition
- f. Propose a new system of certification and labeling where multiple standards being used in a product are shown on one logo (e.g. GRS certified jacket filled with RDS certified down).
- g. Add more guidance on partial component identification and labeling.
- h. Add requirements to ensure non-certified retailers receive all information needed for correct labeling (e.g. label release form).
- i. Add clarity on why Textile Exchange certified from 20% recycled content but labels from 50%.

Textile Exchange response: Labelling and Claims to any of our standards is addressed in our Claims Policy. Upon completion of the standards revision, the Claims Policy will be updated accordingly.