

## Calibration Log

The following is a list of calibration items issued by Textile Exchange. This list is provided publicly on the <u>Textile Exchange website</u>.

Calibration items shown apply to current normative documents, or to documents which are currently being phased out (Status: "Retirement Pending"). These represent supplemental guidance which Textile Exchange will integrate into guidance documents such as User Manuals were possible. Calibration only applies to the applicable version of a document, where it is specified.

Each calibration item has been assigned a unique number for easy reference. This can be found at the top left corner, before the calibration title (e.g. "Calibration 150"). Please note that not all numbers will be listed nor listed sequentially due to some calibration items having been rejected, retired, or are still pending review/approval.

All calibration items will be retired with the release of the next major revision of the applicable Textile Exchange standard and/or policy. Any calibration items that still apply will then be reissued as applicable.

An automatic 14-day consultation period applies for each calibration item after the first time it is published for certification bodies, during which Textile Exchange will accept feedback to <a href="mailto:assurance@textileexchange.org">assurance@textileexchange.org</a>. Certification bodies shall apply the calibration as applicable during this time.

## Calibration 276 New Updated Reclaimed Material Declaration Form

References: GRS-101-V4.0 (A4.1.b.iii, Appendix C), RCS-101-V2.0 (A4.1.b.iii, Appendix C)

**Situation:** Tracking textile waste from its origin to recycling remains manual and relatively underdeveloped. The availability of reliable information and the accessibility to it are essential for ensuring effective and efficient tracking of textile waste. While information about textile waste is currently collected, the data collected is not classified and standardized in a way that allows for efficient data consolidation, processing, and exchange – a foundational step needed for digitization and scaling.

Collectors and concentrators may optionally become GRS or RCS certified. There is also a lack of clarity about documentation for GRS and RCS certified collectors and concentrators.

#### Interpretation:

- 1. This calibration is optional to be implemented and may be used as of July 1, 2025, with no mandatory implementation date.
- 2. The reclaimed material declaration form (RMDF) should be completed by the first certified organization in the supply chain (collector, concentrator, or recycler) and submitted to their certification body.



## Calibration 276 New Updated Reclaimed Material Declaration Form

- 3. If a collector or concentrator is GRS or RCS certified, the collector or concentrator should obtain outgoing transaction certificates for reclaimed materials which are sold.
- 4. In place of the RMDF in GRS-101-V4.0/RCS-101-V2.0 Appendix C, the updated template TE-MM-TEM-105 Reclaimed Material Declaration Form should be used.

NOTE: TE-MM-TEM-105 will be required for all reclaimed inputs under the Materials Matter Standard.

5. If TE-MM-TEM-105 is used for the RMDF, all criteria identified in that document shall be met, including the uploading of the RMDF to Trackit by the certification body.

Conformity and Issue Date: 2025.07.01 Status: Issued

#### Calibration 283 TE-ID for Farms

References: ASR-103-V3.1 C4.2

**Situation:** The initial implementation of the Textile Exchange-ID (TE-ID) excluded farms who are not also the main site/certified organization. This was due to some unique considerations for farms. This calibration provides details and timelines for implementation of the TE-ID for farms as referenced in ASR-103-V3.1 C4.2 and applies to both RDS and RAF certified farms.

#### Interpretation:

- 1. This calibration is effective July 1, 2025, with mandatory implementation identified per criterion below.
- 2. For the purpose of this calibration, 'farms' refers to all facilities listed on a scope certificate with any of the following process codes: PRO037 farming (area), PRO038 farming (communal), PRO011 farming (group), or PRO036 farming (individual). Farms who are also the certified organization have already received TE-IDs and are therefore excluded from the scope of this calibration.
- 3. Textile Exchange will prepare a snapshot of data for all farms with data uploaded to dTrackit before July 1, 2025 and will provide a list of TE-IDs per certified farm to the certification body no later than August 15, 2025. The certification body will receive an email notification with instructions to access this data or a copy of the data.
- 4. The certification body shall either provide TE-IDs to each farm or instruct the certified organization to do so within 30 calendar days of receiving the TE-IDs. In the case that the



#### Calibration 283 TE-ID for Farms

certified organization is providing the notice, the certification body shall confirm this during or prior to the next regularly scheduled audit.

- 5. TE-ID registration for farms which are not included in the initial registration process (see item 2 above) shall be conducted either via the organization using the registration portal at https://textileexchange.org/te-id/ or via a bulk upload process. To initiate the bulk upload process, the certification body shall email teid@textileexchange.org.
- 6. TE-IDs shall be listed for all farms on scope certificates issued or updated and in data submissions to Textile Exchange made on or after October 1, 2025, except as allowed for by Calibration 280.
- 7. TE-IDs shall be included on farm surveys submitted once the TE-ID field is added to the form, which will be on or after October 1, 2025.
- 8. If a farm with an existing TE-ID joins a new farm group (e.g. moves from one farm group to another), no additional registration process is required.
- 9. For farms, an indication that the TE-ID is for a farm, along with the farm's state/province (where applicable), and the farm's country/area is considered to be public information. The name and address are redacted for privacy reasons unless the farm is a certified organization (i.e. the farm is the main site on a scope certificate).

Conformity and Issue Date: 2025.07.01 Status: Issued

Calibration 277	Discrepancy Between Material Composition Testing and Percentage of
	Certified Content Listed on the Claim

#### References: TE-301-V1.3 (B3.1.1, B3.13.4)

**Situation:** If composition testing reveals a discrepancy within the allowable margin of error and the percentage of certified content that is listed on the claim, what options are available to claims makers, keeping in mind the following:

- Textile Exchange Standards claims currently require the percentage listed in the claim to match the TC.
- Brand care labels must comply with legal labeling requirements, and thus will list the percentage results from composition testing.
- The product/care label composition may differ from the required percentage for the Standard claim.



Calibration 277 Discrepancy Between Material Composition Testing and Percentage of Certified Content Listed on the Claim

#### Interpretation:

- 1. This calibration is effective as of June 1, 2025 and should be implemented immediately, with mandatory implementation by September 1, 2025.
- 2. When composition testing reveals a discrepancy within the allowable margin of error and meets the minimum content percentage requirements for product-related claims in TE-301-V1.3 B3.1.1, the product-related claim may:
  - a. Use the material composition percentage(s) appearing on the product's composition/care label, provided that this matches the composition test results;
  - b. Use the material composition percentage(s) as listed on the transaction certificate; or
  - c. Use a minimum percentage as described in TE-301-V1.3 B3.13.4.
- 3. The percentage used for the relevant standard claim must meet the content percentage requirements for product-related claims in TE-301-V1.3 B3.1.1.

NOTE: Refer to Calibration 269 for the allowable margin of errors and the requirements for addressing discrepancies both within and outside of the margin of error when issuing transaction certificates.

Conformity and Issue Date: 2025.06.02 Status: Issued

Calibration 282 VR2 Credit Expiry Timeline

References: CCS-105-V3.1 (A2.11)

**Situation:** CCS-105-V3.1 only allows for organizations implementing VR2 processes to accumulate credits for a maximum of 12 months. This timeline is too short to be viable for organizations implementing VR2 processes.

#### Interpretation:

- 1. This calibration is effective and mandatory as of May 1, 2025.
- 2. The timeline in CCS-105-V3.1 A2.11 is extended to 24 months.
- **3.** This calibration may be applied retroactively to credits which expired during the 12 months prior to the publication of this calibration.

Conformity and Issue Date: 2025.05.01 Status: Issued



Calibration 281 Input Transaction Certificate Certified Weight Used

**References:** ASR-104-V3.1 (D2.1.5)

**Situation:** Information about the certified weight used from an input transaction certificate (field inputTcCertifiedWeightUsed) is inconsistent between ASR-104-V3.1 and ASR-507-V2.1. It has been noted that the format prescribed by ASR-507-V2.1 is required for the function of the upcoming Material Ledger.

#### Interpretation:

- 1. This calibration is effective as of May 1, 2025 and should be implemented immediately, with mandatory implementation by August 1, 2025.
- 2. ASR-104-V3.1 D2.1.5 shall be read as "Certified weight used (inputTcCertifiedRawMaterialWeightUsed) and certified weight raw material (inputTcCertifiedRawMaterialCode) The weight of claimed material used for products on the transaction certificate from each input transaction certificate. (inputTcCertifiedRawMaterialWeightUsed), specified per raw material (inputTcCertifiedRawMaterial)."
- 3. The field inputTcCertifiedWeightUsed is no longer applicable and has been replaced with inputTcCertifiedRawMaterialWeightUsed.

Conformity and Issue Date: 2025.05.01 Status: Issued

Calibration 280 RDS Farm Group Members on Scope Certificate PDFs

**References:** ASR-103-V3.1 (B3.2.3)

**Situation:** There are technical challenges to including RDS certified farm group members on scope certificate PDFs.

**Interpretation:** RDS certified farm group members may be excluded from site listings on scope certificate PDFs, provided that they are included in dTrackit data submissions for the scope certificate. This does not apply to individual farm or farm area certification.

Conformity and Issue Date: 2025.05.01 Status: Issued



Calibration 275 Document to Accompany the Brand's Invoice

References: CCS-101-V3.1 (E4.3)

**Situation:** CCS-101-V3.1 E4.3 requires brands to provide specific information on an invoice or a supplementary sales document which accompanies the invoice when selling certified products to another business (i.e. not a consumer). There is a lack of clarity on what will meet this requirement. Some invoices are sent through Electronic Data Interchange (EDI) formats which do not allow for additional detail to be included, and where a supplementary sales document is often needed.

#### Interpretation:

- 1. This calibration is effective as of April 1, 2025 and should be implemented immediately, with mandatory implementation by July 1, 2025.
- 2. The brand's TE-ID may be included on invoices or supplementary sales documents in place of or in addition to the brand's license code to meet CCS-101-V3.1E4.3.
- 3. When a supplementary sales document is used to meet CCS-101-V3.1 E4.3, it is not necessary to provide a supplementary sales document per invoice. Supplementary sales documents may be provided periodically, such as once per season or per collection, or may also be a URL to access from the invoice. The supplementary sales document may be provided separately and not directly connected to the invoice.
- 4. Supplementary sales documents shall be provided no later than 30 days after the invoice date and may be provided before the invoice date.

EXAMPLE: A seasonal product listing/sales workbook shows the brand's TE-ID and identifies specific styles as OCS certified. This listing is provided in April for products which are invoiced between July and September of the same year. This listing is sufficient to meet CCS-101-V3.1 E4.3.

Conformity and Issue Date: 2025.04.01 Status: Issued



Calibration 220 Mixed Fibers and Proportion of Fibers

References: CCS-101-V3.1 (D4), ASR-213-V1.3

**Situation:** Pre- and post-consumer waste such as yarn or non-woven textiles are recycled into various textile materials. CCS D4.2 calls for a material composition test report of the output claimed material, but this requirement has proven to be unpractical due to:

- The high cost and duration of testing,
- The impossibility of finding the exact proportion of each fiber in the output material, and
- The error factor introduced by the big amount of different input materials, along with their size and weight.

For example, 1000 garments will have 1000 varieties of blends or materials, and each garment's weight will be slightly different.

**UPDATE 2025.03.01**: RM0258 and RM0259, which belong to 'no attribute' and 'GOTS' mixed fiber categories, respectively, were incorrectly included in the calibration and need to be removed

Originally Published: 2023.02.28

**Interpretation:** When mixed fibers are used in raw materials, there is no need to do a material composition test to know the percentage of each fiber present. The raw material codes for recycled mixed fibers (RM0260, RM0261) shall only be used by the material recycler. No other operator in the supply chain, after the recycler, is allowed to change the mixed fiber codes in the output transaction certificate or when they are used in the material composition on the input transaction certificate.

A blend of virgin material shall not be defined as "mixed fibers" in any case. The mixed-fiber codes are only allowed to be used by recyclers for pre-consumer and post-consumer waste.

When an input transaction certificate specifies that a product contains mixed fibers, this same designation shall be used in the output transaction certificate. Even when the detailed results of a material composition test are available, the transaction certificate shall list "mixed fibers" with the corresponding raw material code rather than separating out individual fibers.

**UPDATE**: RM0258 ('No attribute' mixed fiber) is reserved for use when the exact material composition is unknown but the material does not qualify as pre- or post-consumer, such as spinning process waste which can be returned to a spinning process.

RM0259 has been removed from this calibration since it does not apply to Textile Exchange standards.

Conformity and Issue Date: 2025.03.01 Status: Issued



Calibration 226 Clarification of Additives in Material Composition

References: CCS-101-V3.1 (D4.2), ASR-104-V3.1 (B2.10.11)

**Situation:** Additives are not reflected in the material composition on product labels due to labeling regulations. Consequently, there is a lack of clarity in the Standard regarding how additives should be considered in composition calculations and declared on transaction certificates.

Prior to the fabric stage, there are specific processes which may involve the use of considerable amounts of additives. This may potentially lead to the output weight exceeding the input weight, especially in processes with minimal process loss. The most typical use of such additives is in the production of synthetic fibers, particularly polyester (PES). Examples of such additives include pigments, titanium dioxide (TiO<sub>2</sub>), ceramic, charcoal, silver, and purified isophthalic acid (PIA) for low melt, among others. These additives are added directly or together with a carrier polymer.

**UPDATE 2025.03.01**: 8b. has been amended (refer to interpretation). Data submission syntax varies depending on the method that is used, so the use of semicolon is not necessarily required on every submission.

Originally Published: 2025.02.01

#### Interpretation:

- 1. This calibration is effective as of March 1, 2025 and should be implemented immediately following that date where possible, with mandatory implementation by July 1, 2025.
- 2. This calibration clarifies the exclusion of additives from the material composition and outlines the methodology for accounting for their presence by weight in the transaction certificates. For the purpose of this calibration, the following definitions apply:
  - a. Additives: Non-fiber and non-polymer substances added to textile products to change or improve the properties and that exist in the output product.
  - b. Masterbatch: Concentrated mixtures of pigments and/or additives in a polymer-based carrier matrix used to color, enhance, or provide functional properties to the fiber, used in synthetic fiber production.
- 3. Additives used during dying/printing/finishing of yarn/fabric/garments do not need to be calculated or declared on a transaction certificate since they are used in negligible amounts which are typically less than the process loss and since the quantities are challenging to detect. This does not include heavy prints such as flock (see items 4 and 5).
- 4. Additives used in the production of some special fabrics, through coating, lamination, impregnation, and heavy prints, are treated as components. "Calibration 262 Material



## Calibration 226 Clarification of Additives in Material Composition

Composition of Some Special Fabrics" explains how to make a component claim for these fabrics.

- 5. Heavy prints and adhesives added at the final manufacturing stage shall be considered to be trims. See 'Calibration 268 Clarification of Trims in Material Composition.'
- 6. When additives are incorporated using a polymer carrier, the polymer itself shall not be considered an additive.
  - a. In the case of masterbatch use, the pigments may be considered additives, but the polymer in the masterbatch shall not be considered to be an additive. The same approach applies for flakes used as a carrier for additives.
  - b. For simplicity, if the total weight of the masterbatch or flake carrying the additives does not exceed 1% of the net weight, it may be treated as an additive in its entirety.
- 7. Temporary additives such as sizing shall be treated the same as other additives and item 8 shall apply.
- 8. Since additives are not fiber raw materials, they shall be excluded from the material composition. When additives exceed 1% of the net weight, the following shall apply:
  - a. "tcProductInfoAdditional" shall include the text "Additives = X kg", where X is the total weight of additives in kilograms. This should be followed by the name of the additive(s).
  - b. In data submissions, "tcProductAdditives" should contain the name of the additive(s).
  - c. In data submissions, "tcProductAdditivesWeight" shall contain the total quantity of the additive(s) in kilograms.

NOTE: "tcProductAdditives" and "tcProductAdditivesWeight" are two new data fields created for this calibration. These fields do not appear on PDF transaction certificates at this time but will be included in the next major revision to the Transaction Certificate Policy.

- 9. When an input product includes additives on the input transaction certificate, the additives weight shall be ignored in calculating the material composition for the subsequent output transaction certificate.
- 10. This calibration does not exclude any additive in a GRS product from needing to meet GRS chemical criteria.



#### Calibration 226 Clarification of Additives in Material Composition

Example: A product has inputs of 950 kg post-consumer polyester and 50 kg polyester masterbatch (40% polyester, 60% pigments), with a 0% loss factor for simplicity.

Material composition: 98% post-consumer polyester (RM0189) + 2% polyester (RM0186)

- Net weight: 1000 kg

Certified weight: 950 kg

tcProductInfoAdditional: "Additives = 30 kg pigments"

- tcProductAdditivesWeight: 30 kg

- tcProductAdditives: pigments

The subsequent transaction certificate is based on an input of 1000 kg composed of 98% post-consumer polyester (RM0189) + 2% polyester (RM0186).

Conformity and Issue Date: 2025.03.01 Status: Issued

#### Calibration 262 Material Composition of Some Special Fabrics and Yarns

References: ASR-103-V3.1 (B2.2.5), ASR-104-V3.1 (B2.11)

**Situation:** There is uncertainty and confusion regarding the material composition of coated, laminated, impregnated, flock printed, and sequined fabrics and the final products produced from these fabrics. In addition, compliance with the labeling guidelines of the country of sale is expected to be considered.

#### Interpretation:

- 1. This calibration is effective as of March 1, 2025 and should be implemented immediately following that date where possible, with mandatory implementation by July 1, 2025.
- 2. ASR-104-V3.1 B2.10.6 and details of ASR-104-V3.1 B2.11 only permit components to be included on transaction certificates for final products. Calibration 262 is introduced as an exception to these criteria to permit components for specified non-final products and to permit non-certified components in Box 10a. When making a component claim for non-final products, the heading in Box 10a should be changed from 'Certified Components' to 'Components' for clarity.
- 3. The composition of coated, laminated, impregnated, or bonded fabrics with a film-forming polymeric composition incorporated or textile products made up from such fabrics shall be



## Calibration 262 Material Composition of Some Special Fabrics and Yarns

demonstrated based on components unless there is a valid justification. Valid justifications include compliance with regulations in the relevant country of sale for the final product. Component claims shall be made by indicating the material composition of all components of the product including those without claimed/certified material in Box 10a.

- 4. Component claims shall also be used for fabrics that are partially or fully covered with non-textile materials (e.g. flock, sequins, beads), and yarns embellished with non-textile materials (e.g. sequins or beads). A full-product claim is not an option for such products and their derivatives.
- NOTE: A full-product claim for the final product may be made only if the total trims, including non-textile components on semi-finished inputs, do not exceed 10% of the final product (see CCS-101-V3.1 D4.4).
- 5. If the fabric or yarn is to be sold to consumers (i.e. are final products), existing criteria for final products apply.
- 6. A final product made from the fabrics or yarns with components under this calibration shall be claimed component-based unless:
  - A full product claim is required to comply with the labeling regulations of the country of sale; or
  - b. Non-certified components are treated as trims for the final product.
- 7. Until the mandatory date of this calibration, any instances where the certification body permits a full product claim based on a justification it considers valid should be communicated via email to assurance@textileexchange.org, with "Calibration 262" in the subject line. The email should include the case details and the reason for the justification. This is intended solely for feedback collection to identify potential cases necessitating a full product claim and should not be construed as an endorsement.

EXAMPLE: A 100% recycled post-consumer polyester knitted fabric is coated with PU (polyurethane) film. The coating constitutes 20% by weight of the output product. The product has a net weight of 100 kg.

- Product category: Fabrics (PC0028)
- Product Details: Special Fabrics (PD0063)

Component 1 in Box 10.a:



## Calibration 262 Material Composition of Some Special Fabrics and Yarns

- Detail: Base knitted fabric

- Material Composition: 100% Recycled post-consumer polyester (RM0189)

- Net Shipping Weight: 80 kg

Certified Weight: 80 kg

- Standard (Label Grade): RCS (RCS 100)

Component 2 in Box 10.a:

- Detail: Coating material

- Material Composition: 100% Polyurethane (RM0210)

Net Shipping Weight: 20 kg

- Certified Weight: 0 kg

- Standard (Label Grade): na

- EXAMPLE: The shell fabric of a winter jacket is made from a coated fabric.

Product category: Women's apparel (PC0002)

- Product Details: Jackets (PD0001)

Component Detail: Woven base of jacket's outer fabric

- Material Composition: [base fabric of outer shell] 100% Recycled post-consumer polyester (RM0189)

EXAMPLE: A final product (curtains) is made from fabric with sequins, where the base fabric is RCS certified. The incoming fabric transaction certificate shows the sequins as a component. The sequins along with other trims represent less than 10% of the total product weight. The final product is claimed as a whole by entering the total trim amount, including sequins, as supplementary weight.

Product category: Home Textiles (PC0010)

- Product Details: Curtains (PD0020)

- Material Composition: 100% Recycled post-consumer polyester (RM0189)



## Calibration 262 Material Composition of Some Special Fabrics and Yarns

- Net Shipping Weight: 215 kg

- Certified Weight: 200 kg

- Supplementary Weight: 15 kg

Conformity and Issue Date: 2025.02.01 Status: Issued

Calibration 269 Margin of Error Between the Composition Calculations and Any Material

Composition Testing

References: ASR-104-V3.1 (B2.10.11 d)

**Situation:** ASR-104-V3.1 Policy for Transaction Certificates B2.10.11.d allows a margin of error of  $\pm 3\%$  for blended materials and -2% for non-blended materials.

There is a need for clarity on the material composition to be included on a transaction certificate if the fibre composition of a product tested for any reason is within the allowed margin of error.

In addition, in mechanically recycled products obtained from reclaimed textile feedstocks, technically unavoidable impurities sometimes cause to exceed the allowed margin of error, even if a sufficient sorting process is carried out.

This calibration is not meant to introduce any new testing requirements for fiber composition. Instead, it clarifies how to address discrepancies when they are attributed to a composition test conducted for any reason.

**Interpretation:** This calibration is effective as of March 1, 2025 and should be implemented immediately following that date where possible, with mandatory implementation by July 1, 2025.

A margin of error for mechanically recycled plant fibers (e.g. cotton) and recycled animal fibers (e.g. wool) of -3% for non-blended materials and  $\pm 5\%$  for blended materials containing at least 30% of these fibers is allowed.

NOTES: Mechanically recycled synthetic materials will be addressed in the next revision of the Transaction Certificate Policy due to technical limitations on verifications. See TE-101 for the definition of blending.

EXAMPLE: A fabric contains 50% mechanically recycled cotton, based on composition calculations. A margin of error of ±5% applies for the entire fabric.



# Calibration 269 Margin of Error Between the Composition Calculations and Any Material Composition Testing

If composition testing reveals a discrepancy within the allowable margin of error, the material composition stated on the transaction certificate shall align with the composition calculations. The additional information for the product on the transaction certificate (tcProductInfoAdditional) shall include the following statement: "Composition testing showed variance in material composition within allowable tolerances."

If composition testing reveals a discrepancy greater than the allowable margin of error, the material is not eligible to be included on a transaction certificate. Textile Exchange will consider exemption requests for specific cases with a detailed analysis of why the material composition of the product is credible.

The following cases are not considered to exceed the margin of error:

- The presence of "mixed fibers" in the product composition, where the exact content is unknown;
   or
- The use of trims or visible, isolable fibers used for decorative, ornamental, or functional purposes that are included in the composition calculations but not considered in the composition tests.

Invoices may show a different fiber composition from the transaction certificate within the allowable margin of error for the material, due to legislative compliance requirements in the market of sale.

Conformity and Issue Date: 2025.02.01 Status: Issued

Calibration 268 Clarification of Trims in Material Composition

References: CCS-101-V3.1 (D4.4), ASR-104-V3.1 (B2.5)

**Situation:** There is a need for clearer guidance and calibration regarding what qualifies as 'trim' and how to handle items that fall within or outside the 10% threshold, as outlined in CCS-101-V3.1 D4.4.

#### Interpretation:

- 1. This calibration is effective as of March 1, 2025 and should be implemented immediately following that date where possible, with mandatory implementation by July 1, 2025.
- 2. Definition of Trims: Trims refer to supplemental items added to a product for decorative or functional reasons (CCS-101-V3.1, Appendix A). These may include, but are not limited to, elements like collars, cuffs, linings, interlinings, tapes, buttons, zippers, labels, embroideries,



## Calibration 268 Clarification of Trims in Material Composition

prints, adhesives, fillings, and stuffings. Unlike additives, trims are directly visible (or visible when disassembled) and do not require testing or analysis to prove their existence.

- 3. Distinction from Packaging Materials: Trims differ from packaging materials. Trims are present on the product when the end consumer uses it, whereas packaging materials (such as cardboard, polybags, hangers, hooks, hang tags, alarm tags, and sacks) are excluded from net weight. While some customs regulations or industry practices may include certain packaging materials in net weight on commercial documents, certification bodies should not include packaging materials on a transaction certificate solely to match commercial documents.
- 4. Inclusion of Trims in Net Shipping Weight: As per ASR-104-V3.1 B2.5, trims are included in the net shipping weight. However, there are specific conditions and options for how trims are accounted for.
  - a. When Total Trim Weight is ≤ 10% of Product Weight: Non-claimed trims for textile products and footwear may be excluded from material composition and the weight of trims specified as supplementary weight. It is allowable to include some textile-based trims in the material composition and exclude others (e.g. cuffs are included in the material composition while collars are excluded). Non-textile trims (e.g. metal buttons, plastic zippers) should be excluded from the composition unless they are claimed material in which case they should be claimed as components.
  - b. When Total Trim Weight is > 10% of Product Weight: Component claims should be used for the claimed portions of a product. Alternatively, textile-based trims may be included in the material composition of textile products such that the remaining trim weight is ≤ 10% of product weight.

NOTE: Textile Exchange intends to require that claims be made based on components for certain situations in the next major revision to the Scope and Transaction Certificate policies. See also details about when components are required in Calibration 262.

EXAMPLE: A shirt packaged for shipment consists of the following components: woven fabric for main body (the only certified component); pocket, collar and cuffs with a different fabric; polyester buttons; care label; embroidery thread; interlining; hangtag; and polybag.

- The hangtag and polybag are packaging materials and excluded from the net weight;
- The pocket, collar, cuffs, buttons, care label, embroidery thread, and interlining are considered trim
- If the total weight of the trims is  $\leq$  10% of the net weight, those may be specified as supplementary weight.



## Calibration 268 Clarification of Trims in Material Composition

• If the total weight of the trims is 10% or more, some or all of the textile trims may be included in the composition. Since the buttons are non-textile, they are not included in the material composition unless they are claimed material in which case they should be claimed as components.

Conformity and Issue Date: 2025.02.01 Status: Issued

Calibration 248 Remote Audit of an ICS

References: RAF-102-V2.2 (D3.2), RDS-102-V3.3 (D3.2)

**Situation:** Auditing of farm groups for group management functions is usually focused on document control and review, but current criteria (RAF-102-V2.2 RAF Certification Procedures and RDS-102-V3.3 RDS Certification Procedures) do not allow for these functions to be audited remotely.

**Interpretation:** Group management functions of the ICS for RAF and RDS farm groups may be audited remotely by the certification body, i.e. in a remote audit. This does not include audits of farms or of any processing or storage facilities.

Conformity and Issue Date: 2025.01.01 Status: Issued

Calibration 267 Naming the Farm Group on Animal Fiber TCs

References: ASR-104-V3.1 (B2.13)

**Situation:** There is a need to make information about an animal fiber farm group available to the brand, though the current transaction certificate does not allow for this information to be shared.

**Interpretation:** The applicable RAF farm group(s) may be identified on a transaction certificate in Box 12 using one of the following declarations:

"Responsible [wool/mohair/alpaca] [on this transaction certificate/in product(s) [product number(s)]] sourced from farm group [farm group TE-ID] [Optional: Farm group name]."

"Responsible [wool/mohair/alpaca] [on this transaction certificate/in product(s) [product number(s)]] sourced from farm groups [farm group 1 TE-ID] [Optional: Farm group 1 name], [farm group 2 TE-ID] [Optional: Farm group 2 name], [additional farm groups as needed]."



## Calibration 267 Naming the Farm Group on Animal Fiber TCs

This declaration shall only be included if all of the following conditions are met:

- a. Each input transaction certificate for the named fiber (i.e. certified fiber mentioned in the declaration, e.g. responsible wool) either i) names the farm group as seller on the input transaction certificate, or ii) includes the declaration specified above;
- b. All applicable farm groups for the named fiber present in the product are listed; and
- c. The product numbers on the output transaction certificate are named unless all of the named fiber on the transaction certificate is sourced from one farm group.

Multiple declarations may be included for different products on the transaction certificate. Declarations should be separated per product if the list of farm groups is different for each product.

Transaction certificates issued before the publication of this calibration may be amended to add this declaration using tcAmendmentReason of "E".

#### Examples:

- "Responsible wool on this transaction certificate sourced from farm group TE-12345678 ABC Farming."
- "Responsible mohair in products 1, 2, and 4 sourced from farm groups TE-87654321 and TE-98765432."

Conformity and Issue Date: 2025.01.01 Status: Issued

## Calibration 238 Adding RCS for GRS certified organizations

References: ASR-103-V3.1 (A5.6.3)

**Situation:** Sometimes an organization is GRS certified but not RCS certified and needs to sell products as RCS certified. This includes cases where the organization is selling to an RCS certified brand and wants the organization to apply labels, as well as cases where products are identified as ineligible for GRS but eligible for RCS. Since the criteria of the RCS are all evaluated during a GRS audit, this is low risk.

**Interpretation:** RCS certification is separate from GRS certification. The certification body shall only issue RCS transaction certificates to organizations (sellers) who are RCS certified. Products which carry RCS on-product claims shall not be included on a GRS transaction certificate.

When an organization is GRS certified and wishes to become RCS certified, the certification body may issue an RCS scope certificate for the same scope (facilities, process categories, etc) without



## Calibration 238 Adding RCS for GRS certified organizations

conducting any additional auditing. In this case, the RCS scope certificate shall be issued with the same expiry date (scValidUntil) as the corresponding GRS scope certificate. RCS may be added as a standard to a multi-standard scope certificate which includes GRS (see ASR-103-V3.1A5.6.3).

The certification body may issue RCS transaction certificates for shipments prior to the issue date of the RCS scope certificate, provided that:

- a. The RCS scope certificate is issued before the RCS transaction certificate is issued; and
- b. The organization was GRS certified at the time of the shipment.

**UPDATE 2025.01.01**: This calibration shall be applied only one time for a specific certified organization while it is certified to the GRS scope. After using this calibration once and if the certified organization wants to renew the RCS scope in the following certification cycle, an RCS audit shall be completed.

Originally Published: 2023.10.31

Conformity and Issue Date: 2025.01.01 Status: Issued

Calibration 261 Non-claimed Fibers Present in Amounts of Less Than 5%

References: ASR-104-V3.1 (B2.10.11), ASR-103-V3.1 (B2.2.4), ASR-213-V1.2

**Situation:** In many regulations for consumer-facing products, fibers constituting less than 5% by weight may or shall be legally required to be disclosed as "other fiber." For such fibers, whose content is already known or only determined at the final stage due to difficulties in stating it at the time of manufacture, they may be designated as "other fibers" on product labels.

A similar approach has been evaluated for various benefits to the Standard in terms of the allowance to group non-claimed fibers with less than 5% intentionally added with known content as "Other Fibers" in the final product stage. This will both provide flexibility to use similar terminology in the regulations and also simplify the calculations that do not add value at the final product stage.

However, unavoidable impurities or fibers of unknown content are still addressed under other calibrations subject to margin of error and mixed fibers. Accordingly, there is an ongoing effort to explore ways to better align with regulations.

**Interpretation:** This calibration is optional to be implemented and may be used as of December 1st 2024, with no mandatory implementation date.



#### Calibration 261 Non-claimed Fibers Present in Amounts of Less Than 5%

The intention of this calibration is to streamline the composition calculation by enabling non-claimed contents to be grouped, as they are not critical to be individually calculated at the final product stage. Additionally, it aims to provide flexibility in the use of terminology consistent with regulatory standards, thereby enhancing overall consistency. This calibration is not intended to address unavoidable impurities or fibers of unknown content, which are covered in other calibrations on margin of error and mixed fibers.

Raw material code RM0262 with a user-specific term of "Fibers" or "Fibres" may be used on a scope certificate and/or transaction certificate for one or more non-claimed fibers in a product as long as all of the following conditions are met:

- c. Each fiber is present in an amount of less than 5% by weight;
- d. Each fiber is only present in the product as non-claimed material (e.g. if there is organic cotton in the product, this option shall not be applied for cotton); and
- e. The product is a final product (see TE-101 for the definition of final product).

NOTE: There is no cumulative maximum percentage of the product which may use RM0262 under this calibration, provided that each fiber meets the criteria above. The certification body should advise the seller to work with the buyer to ensure the buyers needs are met in terms of fiber composition.

This calibration does not assume responsibility for ensuring proper labeling and the issuance of transaction certificates in compliance with applicable regulations. It merely provides the flexible options to meet regulatory compliance.

#### Example:

A final product containing "87% Organic Cotton + 4% Polyester + 4% Cotton + 3% Polyamide + 2% Elastane" may be represented on the transaction certificate as one of the followings:

- a. 87% Organic Cotton + 4% Polyester + 4% Cotton + 3% Polyamide + 2% Elastane; OR
- b. 87% Organic Cotton + 4% Cotton + 9% Other [Fibers]; OR
- c. 87% Organic Cotton + 4% Cotton + 7% Other [Fibers] + 2% Elastane (in case needed for label compliance)

Note: 4% Cotton shall not be grouped under "Other Fibres" as it is the same type as organic cotton.

Conformity and Issue Date: 2024.12.01 Status: Issued



Calibration 271 Clarification on the use of Fapiao

References: CCS-102-V3.1 (E2.1.1.f)

**Situation:** There is confusion among ABs and CBs about the use of Fapiao as a supporting document while issuing TCs. Some ABs/CBs consider Fapiao a financial record and some not. The Chinese government tax bureau considers the nature of Fapiao as a tax receipt in mainland China.

**Interpretation:** In CCS-102 E2.1.1 f, Fapiao may be considered a financial record and/or invoice for transaction certificate review. The certification body shall verify the validity of each Fapiao through the Chinese government's online system. The goods or services shall be detailed in the Fapiao and they shall match transportation documents.

In addition, certification bodies should consider if they need to take additional measures to confirm the authenticity of Fapiao. For example, if the certification body reviews the Fapiao within 30 days of issuance, the certification body should subsequently re-verify a sample of those Fapiao at the subsequent audit.

Conformity and Issue Date: 2024.12.01 Status: Issued

Calibration 272 Brand Distribution Facilities on Scope Certificates

References: ASR-103-V3.1 (B3.1.7), ASR-104-V3.1 (B2.9.6)

**Situation:** In ASR-103-V3.1 B3.1.7, brand distribution facilities are required to be listed on scope certificates issued on or after January 1, 2025. This deadline comes at the beginning of a revision of the CCS where details of what is needed for brands may change. There is a note about this in ASR-104-V3.1 B2.9.6.

**Interpretation:** ASR-103-V3.1 B3.1.7 shall be read as: "For brands, distribution facilities are not required to be listed as sites or subcontractors on the scope certificate provided that they are only taking physical possession of final products."

The note following ASR-104-V3.1 B2.9.6 may continue to be applied to storage facilities which are exclusively taking physical possession of final products as of January 1, 2025.

Conformity and Issue Date: 2024.12.01 Status: Issued



Calibration 270 Equivalency of ZDHC and GOTS Chemical

References: GRS-201-V4.2 (D2.3)

**Situation:** GOTS approved chemicals previously had an equivalency with the ZDHC MRSL, so certification bodies were able to accept GOTS chemicals for GRS chemical criteria. The equivalency is discontinued from December 2023. Under Section D2.3 of the ZDHC MRSL conformance requirements, there have been challenges for clients due to the discontinuation of GOTS chemical approval equivalency.

**Interpretation:** In reference to GRS-201-V4.2 Implementation Manual Section D2.3, GOTS-approved chemicals may be accepted as an alternative pathway for meeting ZDHC MRSL compliance.

Conformity and Issue Date: 2024.11.01 Status: Issued

Calibration 273 Wastewater Limits and Testing

References: GRS-101-V4.0 (C2.3e, Appendix D)

**Situation:** In some regions globally, it is extremely hard to find laboratories that are approved by ZDHC and have the full range of tests for ZDHC foundational limits. In some other cases it was observed that the Wastewater Test Report did not match with the testing method criteria outlined in GRS Appendix D for several reported tests.

**Interpretation:** The GRS does not require that wastewater testing be carried out by ZDHC Approved labs. GRS V4.0 C2.3e requires that testing (ii) Shall be conducted by trained personnel using equipment as directed by the test guidelines.

A wastewater test report issued by an independent wastewater testing lab may be accepted under following conditions:

- the lab is accredited under ISO/IEC 17025;
- the report has all the wastewater parameters as prescribed in Appendix D of GRS V4.0 under the scope of accreditation; and
- Different test methods shall be considered equivalent to Appendix D, if the methods and parameters are under the scope of accreditation.

Please note that ZDHC approved lab reports may continue to be accepted. This calibration offers an alternative for cases where ZDHC approved labs are unavailable due to any reason. This calibration does not change GRS4.0 C2.3e: "... Where national and local requirements are more stringent, these limit values supersede the requirements listed in Appendix D..."

Conformity and Issue Date: 2024.11.01 Status: Issued



Calibration 258 RAF Plans and Declarations

References: RAF-102-V2.2 (D2.4.4.c)

**Situation:** The RAF standards contain mandatory criteria related to animal and land management plans as well as declarations from external workers hired by the farm.

These criteria are designated as Major criteria, which results in some farm groups to be assigned a medium risk level and consequently a bigger sample size to be audited which increases the inspection cost based on risk assessment criterion RAF-102-v2.2 D2.4.4.c.

While these criteria are important and shall be kept as Major criteria, they do not justify the higher risk designation.

**Interpretation:** Criterion RAF-102-V2.2 D2.4.4.c may be read as follows: "*No major non-conformities* were issued for the scope certificate in the past year including during the previous audit except for criteria AW3.2, AW5.11.1, and LM2.1 in all RAF standards, i.e. RAF-101a-v2.2, RAF-101b-V1.2, and RAF-101c-V1.0."

Non-conformities for the listed criteria do not prevent a low risk score.

Conformity and Issue Date: 2024.07.01 Status: Issued

Calibration 263

No Revision of Financial Records for RAF Primary Scopes Transaction

Certificates

References: CCS-101-V3.1 (D5.4.1), CCS-102-V3.1 (D2.1.2.a, E2.1.1.f)

**Situation:** The primary scope of the animal fiber industry includes commercial practices where formal financial documents are not always available, putting the organization at risk of not conforming to criteria contained in the CCS-101-V3.1 and CCS-102-V3.1 that calls for these types of documents to be reviewed during/after the audit. These criteria needs to be updated to prevent a disadvantageous situation for RAF primary scopes organizations.

Interpretation: Financial records criteria in CCS-101-V3.1 D5.4.1 and CCS-102-V3.1 D2.1.2.a, E2.1.1.f are not required for product categories: PC0032 (tops), PC0034 (undyed fibers) and PC0045 (Unprocessed non-reclaimed fibers/materials) when claimed raw materials are limited to the following: RM0003 (organic alpaca), RM0007 (responsible alpaca), RM0060 (organic mohair), RM0064 (responsible mohair), RM0079 (organic wool), and RM0083 (responsible wool).

Conformity and Issue Date: 2024.07.01 Status: Issued



Calibration 264 Product Category 0045 for Transaction Certificates Within 365 Days

References: ASR-104-V3.1 (A8.3.3.d)

**Situation:** Greasy wool, which falls under product category PC0045 Unprocessed non-reclaimed fibers/materials, is commonly traded on EXW terms and stored for periods of time at the seller's facility. This product category has recently been included in ASR-213-V1.3 and needs to be considered in ASR-104-V3.1 for the issuance of transaction certificates within 365 days of the earliest shipment date.

Interpretation: ASR-104-V3.1 A8.3.3.d may be read as follows: "Within 365 days of the earliest shipment date, if the products on the transaction certificate are limited to the product categories PC0032 (tops), PC0034 (undyed fibers), and PC0045 (Unprocessed non-reclaimed fibers/materials), and to the following claimed raw materials: RM0003 (organic alpaca), RM0007 (responsible alpaca), RM0060 (organic mohair), RM0064 (responsible mohair), RM0079 (organic wool), and RM0083 (responsible wool); ..."

Conformity and Issue Date: 2024.07.01 Status: Issued

Calibration 256 TE-ID on Transaction Certificates

References: ASR-104-V3.1 (B2.2, B2.3)

**Situation:** According to ASR-104 (Policy for transaction certificates), B2.2.3, if the seller is not the certified organization (i.e. the main site specified on the scope certificate), the name of the certified organization (sellerCertifiedOrganizationName) shall be specified from the cover page of the scope certificate beside "Selling on behalf of". Similar criteria apply for the buyer (B2.3.3).

There has been ambiguity around what sellerTeld and buyerTeld refer to – whether it denotes the facility conducting the sale/purchase or the certified organization (main site specified on the scope certificate of the seller/buyer).

**Interpretation:** The fields sellerTeld and buyerTeld should include the TE-IDs of the facilities listed as the seller/buyer on the transaction certificate. It is also acceptable to include the TE-IDs of the certified organizations (COs) which the seller/buyer is conducting the sale/purchase on behalf of.

As indicated in ASR-104-V3.1 Policy for Transaction Certificates, the field seller Teld shall always include a valid TE-ID and the field buyer Teld shall always include a valid TE-ID if the buyer is certified.

While this is not required at present to reflect the ambiguity in ASR-104-V3.1, Textile Exchange expects to make this mandatory in the future.

Conformity and Issue Date: 2024.06.01 Status: Issued



Calibration 251 Consignee Details According to Incoterm

References: ASR-104-V3.1 (B2.9.6.b)

**Situation:** ASR-104-V3.1 Policy for Transaction Certificates B2.9.6.b specifies that when the buyer is certified, the consignee is required to be a facility on the buyer's scope certificate. Situations have been identified where this is not workable outside of the identified exceptions.

**UPDATE**: Textile Exchange recognizes that the current definition of consignee does not align with the industry use of this term. This has been flagged for review in the next revision to ASR-104 Transaction Certificate Policy. Due to several dependencies with transaction certificates, a change to official terminology is not possible on a faster timeline.

**Interpretation:** This calibration may be implemented immediately upon publication and shall be implemented no later than July 1, 2024.

Incoterms®2020 are critical to understanding this calibration. More information about Incoterms including definitions for each individual Incoterm may be found at https://www.trade.gov/know-your-incoterms.

A facility which is not named on the buyer's scope certificate may be listed as a consignee provided that:

- a. The shipping is done based on an Incoterm of FCA, CPT, CIP, FAS, FOB, CFR, and CIF.
- b. The Incoterm is specified in Box 12 of the transaction certificate. A reference to the shipment number is included if this is not the same for all shipments on the transaction certificate.

In this case, the buyer's certification body shall ensure that transport documentation from the consignee to the buyer's facility is reviewed either as part of issuing the subsequent transaction certificate or on a sampling basis as part of the next audit of the buyer (e.g. when the buyer is a brand and does not obtain outgoing transaction certificates).

If the buyer on a transaction certificate is a certified trader (i.e. does not take physical possession of the product), the consignee shall match the consignee which will be listed on the trader's outgoing transaction certificate.

If the exact port facility which will receive the shipment is not clear when the transaction certificate is issued, the port itself may be named as consignee. The name of the port may be entered in the consignee Address1 field if a street address is unavailable.

Conformity and Issue Date: 2024.06.01 Status: Issued



Calibration 259 Brand Input TCs Not in dTrackit

References: ASR-104-V3.1 (A4.2), CCS-101-V3.1 (E1.4)

**Situation:** The latest transaction certificate policy requires that certification bodies only use the Textile Exchange Authenticate a Transaction webpage or another method provided by Textile Exchange to authenticate transaction certificates as of January 2024 (see ASR-104-V3.1A4.5).

It is unclear if brands are expected to authenticate their incoming transaction certificates via the same means when they are making claims and are also not obtaining outgoing transaction certificates (as is typical for brands).

**Interpretation:** The brand is not required to consider an incoming transaction certificate missing from the Textile Exchange Authenticate a Transaction webpage to be a doubt about the validity of the claims, provided that the transaction certificate can be authenticated with the issuing certification body (e.g. via QR code).

If the input transaction certificate is not on the Textile Exchange Authenticate a Transaction webpage, no output transaction certificate (e.g. from brand to retailer) is possible.

Textile Exchange expects to require certified organizations to authenticate transaction certificates via the Textile Exchange Authenticate a Transaction webpage following the next revision of the CCS.

Conformity and Issue Date: 2024.06.01 Status: Issued

Calibration 245 Amendment of Transaction Certificate Typographical Errors

References: CCS-102-V3.1 (E2.2.1.b), ASR-104-V3.1 (A9.4)

**Situation:** Many cases of typographical amendments to transaction certificates are requested or identified after fourteen days of issuance, but there is documented evidence received by the certification body by the date of issuance proving it was a typographical error during the creation process.

**UPDATE**: ASR-103-V3.1 introduced the implementation of the TE-ID, which is a massive project that will likely take a considerable amount of time to have all its components working harmoniously.

Flexibility can be introduced for typographical corrections when they are supported by documents.

**Interpretation:** CCS-102-V3.1 E2.2.1.b may be read as follows: "To correct typographical errors either within fourteen calendar days of issuance (including increasing the quantity of claimed materials) or beyond fourteen calendar days of issuance if the correction is supported by documentation that the



## Calibration 245 Amendment of Transaction Certificate Typographical Errors

certification body had on file on the date the transaction certificate was issued (excluding increasing the quantity of claimed materials)."

CCS-102-V3.1 E2.2.1.g, which is as follows: To add or correct a TE-ID or a client number (formerly known as a license number).

ASR-104-V3.1 A9.4.6, which is as follows: "N" for adding or correcting a TE-ID number or a client number (tcAmendmentReason).

Conformity and Issue Date: 2024.03.01 Status: Issued

Calibration 253 Technical System Limitations During Transaction Certificate Amendment.

References: ASR-104-V3.1 (A9.2)

**Situation:** The transaction certificate policy prevents certification bodies from using invalidation as a way to amend transaction certificates outside the allowable amendment options. A9.2 intends for the Textile Exchange Data Team to support users in cases where amendments are either not allowed or technical reasons prevent their execution.

Additional clarity on this criterion will help certification bodies understand when to contact the Data team for support on amending transaction certificates.

Interpretation: A9.2 may be read as follows: "The certification body shall not invalidate a transaction certificate in order to reissue it with corrected data, but shall instead amend the transaction certificate. If technical limitations related to dTrackit are preventing the amendment process, the certification body shall contact Data@TextileExchange.org for support. For all other issues related to amendments that are not covered by the applicable criteria in the Assurance policies, the certification body shall contact Assurance@TextileExchange.org."

Conformity and Issue Date: 2024.03.01 Status: Issued



Calibration 254 Use of Text Claims for RCS and GRS Logos with "Chasing Arrows" Symbol

References: TE-301-V1.3 (B3.11)

**Situation:** In some jurisdictions, the chasing arrows or Mobius loop symbol may not be permitted on products that are not recyclable. The current GRS and RCS logos include this symbol, so may not be allowed in some product-related claims.

**Interpretation:** In jurisdictions where the "chasing arrows" or Mobius loop symbol may not be permitted per consumer protection laws (e.g. not being allowed on products that are not recyclable), GRS and RCS product-related claims may omit the relevant Standard logo and use a text claim only.

Conformity and Issue Date: 2024.02.29 Status: Issued

Calibration 252 Independently Certified Subcontractor Under Common Ownership

References: CCS-101-V3.1 (C5.1)

**Situation:** Organizations are allowed to outsource processing and handling of claimed materials to subcontractors. In this case the organization acts as a contracting organization. Following CCS-101-V3.1-C5.1, a subcontractor shall not have common ownership with the contracting organization, thus the contracting organization is not permitted to list a facility under common ownership as an associated subcontractor.

It has been requested that a contracting organization should be allowed to list an independently certified subcontractor as a subcontractor in their scope certificate, although they are under common ownership.

This request arises from various factors, including geographic considerations, as the contracting organization and the independently certified subcontractor could be situated in different countries. Additionally, differences in certification bodies may contribute to this request, as each entity may be certified by a separate certification body.

**Interpretation:** An independently certified subcontractor under common ownership with the contracting organization may be listed as an independently certified subcontractor under the contracting organization's scope certificate. Following CCS-102-D3.4.1, the independently certified subcontractor shall not be audited as part of the contracting organization's audit.

Textile Exchange encourages sites under common ownership to be included under the same scope certificate (preferred) or separate scope certificates with the same certification body where workable.

Conformity and Issue Date: 2024.02.28 Status: Issued



Calibration 249 Use of TE-ID for Assured Claims

References: TE-301-V1.3 (B3.10)

**Situation:** The implementation of the Textile Exchange ID (TE-ID) will be used to identify a facility in Textile Exchange's database, thus replacing the license number and responsible certification body name requirement for all assured claims made by organizations who have received confirmation of their TE-ID and submitted a formal claim approval application.

Interpretation: TE-301-V1.3 Standards Claims Policy B3.10, and all other criteria under Section B:

 Assured Claims that refer to a certified organization's license number and responsible certification body name, may be replaced or accompanied by a certified organization's TE-ID.

Conformity and Issue Date: 2024.01.30 Status: Issued

Calibration 247 Implementation of Certified Organization Registration and TE-ID

References: ASR-103-V3.1 (C4)

**Situation:** The implementation of the Textile Exchange-ID (TE-ID) in early 2024 requires some clarification.

Textile Exchange is providing certification bodies with lists of pre-assigned TE-IDs in three batches, as follows:

- 1. Facilities listed in dTrackit on an SC by September 13, 2023 (provided to certification bodies December 1, 2023);
- 2. Facilities listed in dTrackit on an SC by November 15, 2023 (provided in late December 2023); and
- 3. Facilities listed in dTrackit on an SC by December 31, 2023 (to be provided in January 2023).

When an organization registers to create or claim their TE-ID with Textile Exchange, there may be a delay of up to 14 calendar days before the TE-ID is provided. Textile Exchange may ask for certification body assistance in the deduplication of data, which may occasionally result in longer delays.

UPDATE: "...up to seven 14 calendar days..."

**Interpretation:** The following items apply for the implementation of the TE-ID in the first quarter of 2024:



## Calibration 247 Implementation of Certified Organization Registration and TE-ID

- 1. If a certified organization or facility does not have a TE-ID which was pre-assigned by Textile Exchange (i.e. is newly becoming certified in 2024 or data was not provided to dTrackit in 2023), the registration process with Textile Exchange is mandatory before that certified organization or facility may be listed on a scope certificate issued in 2024.
- 2. If a certified organization or facility does have a pre-assigned TE-ID, the certification body may issue a scope certificate during the months of January and February 2024 for that organization or facility without the registration process being completed. In this case, the registration process shall be completed before April 1, 2024.
- 3. The TE-ID is required for the certified organization and all facilities on all scope certificates issued in 2024. All data submissions to dTrackit shall include TE-IDs for the following, effective January 1, 2024:
  - The certified organization and all facilities listed on each scope certificate (certifiedOrganizationTeld and facilityTeld); and
  - b. The seller on each transaction certificate (sellerTeld).
- 4. dTrackit will accept data submissions which do not meet item 3. above until March 31, 2024, and will identify them as not meeting the applicable policy but will not reject the data. Effective April 1, 2024, any data submissions which do not meet item 3. above will be rejected by dTrackit restriction logic.
- 5. For new certifications, the certification body should assign a CB client code and provide it to the organization prior to asking the organization to register for a TE-ID but should encourage or require the organization to register for the TE-ID well in advance of the certification decision being made.
- 6. The certification body may specify contact email addresses for the following by emailing assurance@textileexchange.org. If no separate email address is provided, the certification body's primary contact with Textile Exchange will be used.
  - Receiving a periodic report by email of completed registrations associated with the certification body. The certification body may opt-out of receiving this upon request.
     And
  - b. Requests for support with deduplication of data relating to the certification body's data submissions and specific registration applications.
- 7. Scope certificates do not need to be updated to include the TE-ID until the earliest of these events occurs:



## Calibration 247 Implementation of Certified Organization Registration and TE-ID

- a. Recertification on or after January 1, 2024;
- b. The scope certificate is updated for other reasons (e.g. to add products) on or after April 1, 2024; or
- c. The end of 2024, by which point the scope certificate shall be updated to include the TE-ID (for RAF farm scope certificates which do not expire in 2024 only).
- 8. Transaction certificates may be issued without the seller's TE-ID for the months of January and February 2024 only, if the seller was certified during 2023 and the certification body has not received a pre-assigned TE-ID for the seller.
- 9. An outgoing transaction certificate may be issued if the incoming transaction certificate is missing TE-ID data, under CCS-102-V3.1 E2.1.11.
- 10. In the case of a scope certificate transfer between certification bodies before the TE-ID has been added to the preceding certification body's scope certificate, the organization may obtain the TE-IDs for all of their facilities (including associated subcontractors) by completing the registration process.

Conformity and Issue Date: 2024.01.26 Status: Issued

Calibration 242 License and Facility Number Data Submissions

References: ASR-103-V3.1 (B3.1.1, B3.4), ASR-104-V3.1 (B2.2.6, B2.3.6)

**Situation:** There are some data fields which should be specified in dTrackit submissions for the calendar year 2024 but which are not reflected in the updated SC Policy 3.1 and TC Policy 3.1.

**Interpretation:** The following fields should be specified in dTrackit submissions for scope and transaction certificates in 2024 to support the reconciliation of identifiers as the TE-ID is being implemented:

- a. On scope certificates: facilityNo, subcontractorLicenseNo
- b. On transaction certificates: sellerLicenseNo, buyerLicenseNo (if the buyer is certified)

Conformity and Issue Date: 2023.12.18 Status: Issued



Calibration 244 Risk designation for brand headquarters and distribution facilities

References: CCS-102-V3.1 (Appendix B1.h)

**Situation:** The current version of CCS-102 assigns a high-risk designation to a brand when it gets major non-conformities during an audit. This creates the need to audit many distribution facilities which causes unnecessary auditing and a higher cost for the certified organization because low-risk distribution facilities do not require regular auditing.

The consideration given to headquarters and distribution facilities after establishing the risk designation needs to be different.

**Interpretation:** Appendix B1.h may be read as follows: "Has the site had one or more major non-conformities issued for the scope certificate in the past 12 months, including during the previous audit?"

A major non-conformity at any of the sites which do not take physical possession of product shall not automatically assign a high-risk level to distribution facilities where only major non-conformities related to material handling need to be considered.

Conformity and Issue Date: 2023.12.14 Status: Issued

Calibration 235 Guideline regarding the second-party and third-party testing

References: CCS-102-V3.1 (E2.1.3)

**Situation:** There is confusion regarding product quality testing criteria, including who may conduct testing and which test reports are required for transaction certificates.

**UPDATE**: Upon further review of the original Calibration 235, Textile Exchange has identified a need for more consultation and more detail in any future testing criteria.

**Interpretation:** CCS-102-V3.1 E2.1.3.b may be read as follows: "*Third- or second-party product quality test reports for inputs and outputs (recommended for non-recycled fibers, all yarns, and all fabrics)."* 

Quality tests refer to the following tests:

- For fibers (PC0033, PC0034), the fiber length in mm and fiber fineness in applicable unit;
- For yarns (PC0029, PC0030, PC0031), the yarn count;
- For fabrics (PC0025, PC0026, PC0027, PC0028, PC0039), the fabric gsm (weight in g/m2) and fabric construction (e.g. ends/picks per inch, yarn count).



## Calibration 235 Guideline regarding the second-party and third-party testing

Textile Exchange will consider reintroducing mandatory quality testing criteria via future standard revision processes. This updated calibration also replaces Calibration 241.

Conformity and Issue Date: 2023.12.01 Status: Issued

Calibration 239 Omitting Material Types for 100% Certified Recycled or Organic Claims

References: TE-301-V1.3 (B3.13.5)

**Situation:** When a product contains 100% certified recycled or organic content, could a more generic claim about the materials be made and not list each material name out?

**Interpretation:** For RCS, GRS, and OCS, where multiple material types are certified but the product also contains non-certified material, each material shall be separately listed with the percentage content (e.g. "Made with 48% OCS certified organically grown cotton and 32% OCS certified organically grown wool").

For a product or component made of 100% RCS, GRS, or OCS certified materials, the material type(s) may be omitted (e.g. "Made with 100% GRS certified recycled materials").

Conformity and Issue Date: 2023.11.30 Status: Issued

Calibration 240 "PR0034 Other" no approval needed

References: CCS-102-V3.1 (Appendix B1 Note 1)

**Situation:** The CCS certification procedure require approval from Textile Exchange for the 'other' process category (PR0034) to be used. Textile Exchange has initiated a new internal process for managing 'Other' codes.

**Interpretation:** Certification bodies may use all 'other' codes from ASR-213-V1.2 (RM0262-7, PR0034, PC0038, PD0100) without separate approval from Textile Exchange.

A user specific term is required for use of RM0262-7 (see ASR-213-V1.2 3.1.9). A user specific term should be included with all uses of PR0034, PC0038, and PD0100.

Conformity and Issue Date: 2023.11.30 Status: Issued



Calibration 184 Inputs from Tanneries, Slaughterhouses, and Abbatoirs

References: GRS-101-V4.0/RCS-101-V2.0 (A1)

**Situation:** May animal hides/fibers and leather sourced from a tannery, slaughterhouse, or abattoir be accepted as reclaimed inputs?

**UPDATE**: Upon review of additional information, this calibration has been updated to provide additional flexibility.

**Interpretation:** Animal fibers (including wool), and animal hides, sourced following slaughter shall not be accepted as reclaimed inputs for RCS or GRS. Shavings/trimmings from leather tanning, splitting, post-tanning and finishing operations may be accepted as reclaimed inputs for GRS/RCS.

NOTE: Calibration 148 addresses steps for certification bodies when there is ambiguity about whether or not a material may be accepted as reclaimed.

Conformity and Issue Date: 2023.11.14 Status: Pending Retirement (2025.10.01)

Calibration 208 Certification Body Moving their Accredited Office

References: ASR-101-V2.1 (D1.1.8)

**Situation:** A certification body wishes to transfer their accreditation to a different office, which may or may not be in a different country or party of a different legal entity (e.g. subsidiary or sister company) to the office which held the original accreditation. What is the procedure for this? Is this considered a new accreditation?

**Interpretation:** If a certification body wishes to move their accreditation to a different office, the accreditation body shall determine if this may be accepted as a simple update of contact information or if a new accreditation is required, and shall communicate this decision to Textile Exchange.

If the accreditation body determines that this may be accepted as a simple update of contact information, the certification body shall provide an updated application form to assurance@textileexchange.org. Textile Exchange shall update applicable systems accordingly.

If a new accreditation is needed, the certification body shall submit a new application form to Textile Exchange with applicable supporting documentation. Textile Exchange will fully evaluate the application but may rely on past experience and/or evidence from the accreditation body to fast-track the application. Provided that this is a transfer of accreditation (i.e. the original office is not maintaining accreditation), Textile Exchange will not charge an additional application fee and will review an application even if certification body applications are otherwise closed.

Conformity and Issue Date: 2023.08.31 Status: Issued



Calibration 130 Certification of Non-Textile Reclaimed Materials

References: GRS-301-V4.0/RCS-301-V2.2 (A3.1b)

**Situation:** What action should certification bodies take before accepting non-textile reclaimed or recycled inputs for RCS or GRS?

**UPDATE**: Textile Exchange has received significant feedback regarding the wording of the original Calibration 130, including lack of clarity and the additional burden of approvals.

**Interpretation:** Due to the wide range of potential reclaimed or recycled materials available, and due to differing definitions of these terms in different countries or sectors, the certification body shall contact Textile Exchange for approval prior to accepting an application from an organization who wishes to certify non-textile pre-consumer reclaimed or recycled materials which are not already RCS or GRS certified.

**UPDATE**: The above text has been adapted to only include pre-consumer materials. Advance approval is no longer required for post-consumer materials. Advance approval is required prior to recertification of an organization who accepts non-certified, non-textile pre-consumer reclaimed or recycled materials as input unless the certification body has documentation of past approval from Textile Exchange for that organization.

The calibration applies to all certification bodies that hold RCS and GRS accreditation. Each certification body is required to reach out to Assurance@TextileExchange.org in order to evaluate the application. The application consists of a set of questions that need to be answered with the appropriate details. If any ineligible material is identified during the renewal application, the certification body is obligated to withdraw the certification.

Textile Exchange will be building additional guidance to reduce the scenarios in which advance approval is needed, which may include exempting individual submitters or certification bodies from the approval process based on demonstrated performance.

In all cases where advance approval is not needed, Textile Exchange may reach out to the certification body to request an application as described above for a certified organization who is acting as a recycler. In this case, the certification body shall provide the application to Textile Exchange for evaluation.

Conformity and Issue Date: 2023.08.25 | Status: Issued



Calibration 233 Packaging, hangtag, or label manufacturers considered brands for making

claims about their products

References: CCS-201-V3.1 (Section E)

**Situation:** When packaging, hangtags, or labels are certified to a Textile Exchange Standard, who is considered to be the brand?

**Interpretation:** Manufacturers of packaging, hangtags, and labels are typically considered to be brands. The following example should be considered alongside the examples in the list of examples in the guidance note, the below should be added:

This company would be considered a brand: A company designs and develops products which are packaging, hangtags, or labels used for holding or attaching to another product (e.g. garment) and sells them through multiple distribution channels. The labeling and branding of the product are generally done by the company, as is the printing and physical attaching, in the case of hangtags and labels. In the case of packaging, which is not physically attached, the final packaging product may be physically handled by a non-certified organization before being sold to the final consumer.

Conformity and Issue Date: 2023.07.31 Status: Issued

Calibration 236 Activities Performed by Certification Body Subcontractors

References: ASR-101-V2.1 (Appendix A)

**Situation:** Which activities may only be performed by a certification body directly, or by a subcontractor?

Relevant definitions from ASR-101-V2.1: Subcontractor: [...]An independent legal entity hired by a certification body to provide services related to certification activities, excluding freelancers.

Freelancer: An individual who is hired by an accreditation body or a certification body to act as an assessor or an auditor on a contract/non-employee basis, but subject to the accreditation/certification body's procedures. A freelancer may not also conduct client recruitment or management activities (see: subcontractor). An individual may be considered to be a freelancer if payment is made to a company (e.g. an incorporated consulting business), provided that the work is stipulated to be done by a named individual and that the business does not engage in client recruitment or management activities.

**Interpretation:** The following activities are considered to be core functions of certification body operations and shall only be conducted by certification bodies or their subcontractors, not freelancers or other parties:



## Calibration 236 Activities Performed by Certification Body Subcontractors

- Management of auditors, including hiring and selecting auditors for specific audits;
- Planning of audit activities;
- Review of audit reports (separate from final certification decisions);
- Review and granting of claims approvals;
- Processing of transaction certificate applications;
- Maintaining legally required registrations on behalf of the certification body (including CNCA registration for operations in China);
- Client management activities including client communications;
- Direct client recruitment;
- Client invoicing; and
- Contracting with clients including certification agreements.

NOTE: Certification decisions and the issuance of scope and transaction certificates are required to be conducted by the certification body directly and not by a subcontractor or freelancer (see ASR-101-V2.1 D3.2.6.a).

Conformity and Issue Date: 2023.07.12 Status: Issued

## Calibration 228 Use of Poison Baiting for Predator Control

References: RWS-101a-V2.2 (LM2.6.3)

**Situation:** Farmers in different parts of Australia are currently having a major threat from feral pests such as foxes, wild dogs, and feral pigs. Their attacks cause production and financial loss and the local economy is affected. The impact is such that national and state authorities have implemented plans to support the farmers.

These predators maim or kill livestock such as lambs, adult sheep, poultry, goats, and native wildlife. They also pose a threat to humans and pets through the transmission of diseases such as Distemper, Parvo, Mange, Hydatids (Zoonotic disease that can affect humans), Sheep Measles, Neospora Caninum, and Ehrlichiosis. Some animals can even desiccate feed supplies of grazing animals, destroy pasture and habitat, and contaminate water.

The government has implemented programs such as Local Land Services to provide guidance, training, and risk assessments on the use of different pest management techniques such as shooting, trapping, and baiting. Usually, poison baits are restricted materials that cannot be purchased or used without licensing, training, and signage installation on the property.



### Calibration 228 Use of Poison Baiting for Predator Control

The use of poison as a lethal control method is not currently allowed by the RWS.

This calibration aligns with the proposed language for Textile Exchange's upcoming unified standard.

### Interpretation:

A certified farm or farm group in Australia may use poison baiting as a predator control method provided all of the following conditions are met:

- 1. There shall be a verifiable predator threat to goats/sheep.
- 2. Predators shall be classified as invasive species by the relevant authority. Endemic predator species shall not be eligible for the application of this calibration.
- 3. The decision to use poison shall be taken on a landscape or regional level and involve expert input from an external body such as Landcare Australia.
- 4. Anti-coagulant poisons or cholecalciferol shall not be used.
- 5. Poison baiting shall take place over set, targeted periods only -it shall not occur continuously.
- 6. The farm shall have a written predator management plan with the following components at a minimum:
  - a. Detailed explanation of the predator issue,
  - b. Predator control proposal establishing the responsible person for every action, when it shall be executed, and where it will be implemented.
  - Alternative methods of control that conform to the RWS, e.g. shooting individual predators, or use of CO2 traps, including reasons why they are inadequate for the farm's situation.
  - d. Integrated approach analysis considering other predator species that could increase in number if the target predator population is reduced.
- 7. The farm shall have attempted at least two non-lethal control methods (e.g. predator-proof fencing, light or sound deterrents, livestock guardian dogs) before considering the poison bait option.



### Calibration 228 Use of Poison Baiting for Predator Control

- 8. Monitoring shall take place before and after poison bait is used to first determine where invasive predators are active and secondly to determine the success of the baiting program. Records shall be kept.
- 9. The position of baits shall be marked and any undated baits removed at the end of the baiting period.
- 10. Poison bait shall be distributed so as to avoid non-target wildlife being harmed by primary or secondary poisoning.
- 11. Signs shall be placed all around the property, especially on their boundary to ensure all neighbors and visitors are aware poisoning is conducted on the property.
- 12. All bait (including that which is unused or uneaten) shall be used and disposed of according to product label requirements.
- 13. Fumigating dens with carbon monoxide is not an acceptable activity under this exemption.

Conformity and Issue Date: 2023.05.31 Status: Issued

Calibration 227	Darkness Period for Ducks
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References: RDS-101-V3.0 (AW2.7)

**Situation:** Ducks are primarily raised for meat with down a secondary consideration. Companies worldwide are working with different criteria when providing a mandatory darkness period to ducks, depending on the country of operation and the standard(s) prevailing within the farmed duck industry of each country. The RDS criteria differ from some of these standards. Textile Exchange identified the benefit of updating the RDS with the most common practice.

This calibration aligns with the proposed language for Textile Exchange's upcoming unified standard.

**Interpretation:** RDS criterion AW2.7 may be implemented as follows where the criterion as written in the standard is not feasible:

Except for brooding under a heat lamp up to four weeks of age, ducks shall be provided a minimum period of six hours of continuous darkness - or near darkness - at night and this shall be preceded by thirty minutes of dusk and followed by thirty minutes of dawn. In addition, a minimum of eight hours of light during the day shall be provided.

Conformity and Issue Date: 2023.05.31 Status: Issued



Calibration 223 Requirements for Wastewater/Effluent/Sludge Treatment Systems

References: GRS-101-V4.0 (C2.3e, C2.3f)

**Situation:** The GRS allows treating wastewater either on-site or off-site. Many operators treat wastewater off-site in a common effluent treatment plant (CETP) which may be private or government owned.

The Waste/Effluent section in the GRS establishes that CETPs need to conform with GRS v4.0 Appendix D which is based on ZDHC's Wastewater Guidelines. However, CETPs abide by local or national governmental standards which usually are more lenient than ZDHC's standards. Additionally, the certification bodies cannot audit the quality of the water leaving the CETP. These facts create a gap in conformity with the GRS.

Moreover, the GRS is vague on proper treatment and disposal of sludge because it doesn't refer to any guideline parameters to assess its attributes, which is needed for on-site treatment systems that certification bodies will audit.

**Interpretation:** Each GRS site shall have a system to ensure that wastewater receives proper treatment, whether the site has an on-site process or uses an off-site service provider. Depending on the wastewater treatment location, the following applies:

- 1. On-site treatment systems shall conform to the criteria of GRS-101-V4.0 C2.3.
  - a. For sludge management, the site should provide the certification body with a copy of the valid contract between the site and the sludge disposal contractor.
- 2. If using an off-site treatment plant, known as a common effluent treatment plant (CETP), the site shall provide the certification body with evidence that the treated wastewater/effluent leaving the CETP facility meets local or national legal parameters.
  - a. The certification body should confirm that the CETP is legally operating by reviewing the existence of a permit, agreement, or contract with the certified site or with any other system participants such as the local pollution control board.
- 3. The site should provide evidence that sludge generated at the CETP facility meets local or national legal parameters.

Conformity and Issue Date: 2023.05.31 Status: Issued



Calibration 232 Transfer Audits in the case of CB Suspension

References: ASR-112-V2.0 (C3.4)

**Situation:** Transfer audits are abbreviated audits intended to simplify the transition between certification bodies when there may be an urgent need outside of the recertification cycle. ASR-112-V2.0 permits transfer audits in the case of CB withdrawal, but does not permit them for voluntary transfers between CBs. In the case of a CB being suspended, their clients may feel that a transfer of certification is necessary to control risk and ensure continuity of service.

**Interpretation:** A transfer audit may be conducted when the certification body has been suspended for the organization's scope and is still suspended 7 calendar days before the date the transfer audit is conducted. See ASR-112-V2.0 C3.5 for more information about transfer audits.

In this case, the succeeding certification body shall specify the preceding certification body's scope certificate number in the scLegacyNo data field on the dTrackit data submission for the succeeding certification body's scope certificate, and shall follow instructions from Textile Exchange for reporting on transfer audits to allow for fees to be calculated correctly.

Conformity and Issue Date: 2023.04.19 Status: Issued

Calibration 167 Mulesed Restocking

References: RWS-101a-V2.2 (AW4.15), RAF-105a-V2.0

**Situation:** In Australia, the majority of wool still comes from mulesed sheep, which is prohibited under RWS.

A plan that includes the RWS in the recovery phase of the farmer industry in Australia needs to be developed to have animal welfare regulations such non-mulesing principles embedded in the operational procedures of the farms, facilitating the progressive shift of the flock while ramping up operations.

**Interpretation:** The majority of the sheep flock in Australia is mulesed. This creates challenges to producing non-mulesed wool in Australia when related to flock restocking for reasons of maintaining flock genetics or recovering from extreme climate events like droughts and fires. Other reasons for restocking may be: significant expansion of the flock, changing the breed or strain of sheep, and recovering from a disease problem causing high mortality or culling.

Textile Exchange is addressing this situation using a calibration where the criteria below will facilitate a certification body's assessment that determines if an individual exemption is eligible. This process will be carried out by the certification body, based on ASR-101-V2.1 Accreditation and Certification



# Calibration 167 Mulesed Restocking

Procedures for Textile Exchange Standards, section D4.15.3. Exemptions for mulesed stock other than for ram replacements and extreme climate events like droughts and fires must be dealt with on a case-by-case basis - as well as reviewed annually for renewal - per the usual exemption request and approval process with Textile Exchange.

- 1. The certification body may process a single exemption request from a certified group on behalf of several farms for the purchase of mulesed rams.
  - a. The farms need to be members of that group and
  - b. The request needs to include a list of the farms, each showing the number of rams needed for the period of one year.
- 2. Wool from mulesed sheep included in an exemption request shall never be sold as RWS certified.
  - a. The farmer will implement handling and transportation systems to guarantee this wool is kept separate from non-mulesed wool.
- 3. The certification body shall keep a record of the quantity of mulesed stock approved to be purchased in each granted exemption, and
  - a. The certification body will report these numbers to Textile Exchange using ASR-502 Quarterly NC Report Template, in the Exemption tab, using column H "Notes" to report the number of animals being purchased under that exemption.
- 4. In case of expanding the flock, the farmer must provide their plan in terms of numbers and timelines and why this cannot be met by retention of their own home-bred ewe lambs.
- 5. In case of changing the breed or strain of sheep, the farmer shall provide a plan detailing genetics change and reasoning. For example, the farm is moving to sheep that are better suited to non-mulesing and the farmer is therefore not retaining sheep that have a high wrinkle score, leading to a lack of breeding females.
- 6. In case of disease, the exemption request will be processed similarly as an extreme climate event if it has arisen from circumstances outside the farmer's control (no evidence of mismanagement or neglect).
- 7. The certification body may grant an exemption to a farmer for restocking mulesed sheep if ALL of the following criteria are met:
  - a. The farmer demonstrates they have attempted to source non-mulesed stock before requesting the exemption.



## Calibration 167 Mulesed Restocking

- b. The stock requested is specifically rams for breeding.
- c. An extreme climate event occurs (and is demonstrated to have affected the farm) or the farmer has a specific breeding goal (the exemption request mentions genetic traits/breed type that is being selected).
- d. The number of mulesed breeding males brought in each year is less than 0.5% of the total flock size.
- e. The farmer has implemented handling and transportation systems to guarantee that wool from these mulesed animals will be kept separate from non-mulesed wool and will not be sold or marketed as RWS certified. And
- f. The farmer shall demonstrate that they are not artificially creating a need for additional stock i.e., by selling their own non-mulesed ewes and/or ewe lambs and then requesting an allowance to purchase mulesed animals.

Conformity and Issue Date: 2023.03.03 Status: Issued

Calibration 154 Maps vs GIS Data

References: RAF-101a-V2.1/RAF-101b-V1.1/RAF-101c-V1.0 (F2.6.2)

**Situation:** RAF farm group criteria require the ICS to maintain maps or sketches of each farm showing where animals are located. Textile Exchange is moving to require that GIS data be submitted by each farm. How does this affect the criterion relating to maps?

**Interpretation:** An RAF farm group or communal farmer group ICS is not required to maintain maps or sketches of each farm showing where animals are located provided that the ICS maintains the following, which can be clearly linked per farm:

- 1. A list of farms which can be linked back to the scope certificate;
- 2. A copy of the Farm Questions for each farm, as required by Textile Exchange's system; and
- 3. Polygon data (i.e. GIS shapefiles) for each farm showing the location and amount of farmland.

NOTE: Textile Exchange's system will not automatically give the ICS access to the GIS data for each member farm collected by Textile Exchange, but will provide a mechanism for the ICS to access the information in the future. Additional fees may apply for this access.

Conformity and Issue Date: 2023.02.28 Status: Issued



Calibration 148 Ineligible Reclaimed Inputs

References: GRS-101-V4.0/RCS-101-V2.0 (A1)

**Situation:** Textile Exchange has become aware of several situations where certification bodies have issued scope certificates to material recyclers for material which has been accepted by the certification body as pre-consumer, but which does not match Textile Exchange's definition of pre-consumer material. Textile Exchange acknowledges that this may have related to a lack of clarity in past guidance.

**Interpretation:** Any scope certificates with ineligible inputs (i.e. which do not qualify as reclaimed) shall have the scope reduced to exclude ineligible inputs or shall be withdrawn immediately. No recertification (with the same certification body or a new certification body) is possible in these cases.

If the certification body is not sure if a reclaimed input is eligible or has not certified that reclaimed input before, they should reach out to Textile Exchange for clarification prior to including it in the scope of GRS or RCS certification. If Textile Exchange or the AB finds errors in this area where the certification body did not request guidance from Textile Exchange, the scope certificate shall have the scope reduced to exclude ineligible inputs or shall be withdrawn immediately.

NOTE: A previous exception was included in this calibration for scope certificates issued on or before April 15, 2021. All such scope certificates have now expired so that exception has been removed.

Conformity and Issue Date: 2023.01.31 Status: Issued

Criteria for the product category PC0029 Dyed Yarn for reclaimed dyed

inputs

References: ASR-213-V1.1 (Table 3.3)

**Situation:** Under GRS/RCS, certain products are made from dyed reclaimed inputs (pre-consumer or post-consumer), and additional dyeing is not done on such products. Can we call such yarn 'undyed' or 'greige' yarn instead of 'dyed yarn'?

**Interpretation:** When product inputs used by a certified site have been previously dyed but only identified as dyed products as a result of a previous recycling process, they shall be identified with the 'Dyed yarn' (PC0029) category to avoid confusion with 'Undyed Yarn' (PC0031), which shall not be used on any dyed material.

A supplier may request the certification body to include a statement such as "Product's color was maintained from its life cycle previous to entering the certified supply chain." or "Product is made from inputs which were previously dyed and the resulting product color is not a result of an additional dyeing



Calibration 178 Criteria for the product category PC0029 Dyed Yarn for reclaimed dyed inputs

process.". This information can be included in box 12 of the Transaction Certificate template (ASR-205-V3.0).

NOTE: Post-consumer or pre-consumer reclaimed products could have already been dyed in a previous life cycle and recycled (a process based on color sorting). In such a process, dyeing might not be performed by a certified site, but washing or finishing could be done on reclaimed product, yarn, or fabric. In such a case, the output will also be 'Dyed yarn' (PC0029) since the input is dyed reclaimed product (pre-consumer / post-consumer). When reclaimed products that have been previously dyed are certified, the 'Dyed yarn' (PC0029) category shall be used to avoid confusion with 'Undyed Yarn' (PC0031), which shall not be used on any dyed material.

Conformity and Issue Date: 2023.01.31 Status: Issued

Calibration 216 GRS Modules for Sites without Physical Possession

References: GRS-101-V4.0 (A3.2c)

**Situation:** Do the GRS social, environmental, and chemical criteria apply to sites without physical possession of GRS materials?

**Interpretation:** The GRS social, environmental, and chemical criteria do not apply to sites without physical possession of GRS materials such as traders and buying houses. These criteria still apply to facilities with physical possession of claimed materials, including subcontractors.

Chain of custody criteria from the CCS do apply to these sites when they are certified.

Conformity and Issue Date: 2023.01.31 | Status: Issued

Calibration 222 Water deprivation for ewes in late pregnancy or lactating period.

References: RWS-101a-V2.2 (AW1.7.3)

**Situation:** The requirement in the RWS, for ewes in late pregnancy or lactating period, to not be deprived of water for more than 8 hours, doesn't conform to industry best practice recommendations for preparation time for shearing. These guidelines propose a longer withdrawal from water to allow animals to empty out to protect their health and comfort when they are sheared. These industry guidelines are also taking account of worker health and safety, as empty sheep are lighter and so cause less strain on



### Calibration 222 Water deprivation for ewes in late pregnancy or lactating period.

the shearer. Australian and New Zealand guidelines suggest a minimum of 8 hours and maximum of 20 hours off water for ewes that are in late pregnancy or lactating.

**Interpretation:** Ewes in late pregnancy or lactating period shall not be deprived of water for more than 20 hours.

This requirement supersedes the criterion AW1.7.3 in the standard since this directly contradicts it and is based on further information which is now available to Textile Exchange.

Conformity and Issue Date: 2023.01.31 Status: Issued

Calibration 224 Change of Accreditation Bodies

References: ASR-101-V2.1 (D1.1.8.a)

Situation: What needs to be considered for a certification body to change accreditation bodies?

**Interpretation:** An accredited certification body may change accreditation body for either voluntary or involuntary reasons. An involuntary change in accreditation body occurs when the accreditation body is no longer able and willing to offer accreditation for the certification body's scope (e.g. is no longer a Textile Exchange accreditation body, or is no longer accepting certification bodies in a specific country). A change for any other reason is a voluntary change in accreditation body.

The following steps shall apply for a change in accreditation body:

- 1. The certification body shall notify Textile Exchange of their intention to change accreditation body and submit an updated copy of ASR-206 Certification Body Application Form naming the new accreditation body.
- If the succeeding accreditation body is not an authorized Textile Exchange accreditation body, the certification body shall pay the new accreditation body fee (see ASR-107 Certification Fee Structure) and the accreditation body shall complete the authorization process before the change is approved.
- 3. In the case of a voluntary change in accreditation body, the certification body shall meet the following criteria:
  - a. Any assessment which has been started by the preceding accreditation body has been completed and the accreditation decision has been made.



## Calibration 224 Change of Accreditation Bodies

- b. The certification body shall have a positive accreditation decision from the last assessment with the preceding accreditation body (i.e. there is no suspension or withdrawal of part or all of the scope of accreditation).
- c. The certification body shall be up to date with all required submissions to Textile Exchange, including site fees and data submissions, and shall not be under sanction from Textile Exchange.
- 4. Once the above criteria have been satisfied, Textile Exchange will approve the change in accreditation body.
- 5. The succeeding accreditation body shall consider all assessment reports from the preceding accreditation body for at least the previous two years in conducting their initial assessment.

Conformity and Issue Date: 2023.01.31 Status: Issued

Calibration 15 Pre-Consumer Glass (Moil)

References: GRS-101-V4.0/RCS-101-V2.0 (A1)

Situation: May glass moil be considered to be reclaimed material?

**Interpretation:** Moil (unwanted top that occurs with every glass-blown object) shall not be considered recycled under GRS. Waste from breakage and rejection may be considered pre-consumer recycled if it undergoes an additional reprocessing stage and is within industry norms for the percentage of breakage and rejection.

For cases where the reclaimed status of a material is in question, refer to Calibration 148.

Conformity and Issue Date: 2023.01.19 Status: Pending Retirement (2025.10.01)



Calibration 215 Approval for VR2 Certifications

References: CCS-105-V3.0 (B1.2.3)

Situation: It is unclear when approval from Textile Exchange is required to use VR2 material.

**Interpretation:** Approval from Textile Exchange is required before the certification body schedules an audit for any site which is implementing alternative volume reconciliation directly to produce VR2 materials. No special approval is needed for sites that purchase and sell VR2 materials based on the criteria of the CCS.

Conformity and Issue Date: 2022.12.31 Status: Issued

Calibration 129 Reclaimed Inputs for Buttons

References: GRS-301-V4.0/RCS-301-V2.0 (A1)

**Situation:** A button maker punches buttons out of a sheet of resin. The remaining material from the sheet is reground to be used as an input for buttons. May this material be considered reclaimed/recycled? Is the answer different if the regrinding process occurs at a different site?

**Interpretation:** The remaining material after buttons are punched out of a sheet of resin (or similar material) shall not be considered to be reclaimed or recycled if it is used as a raw material input for button making. This includes situations where the regrinding is outsourced or is done at a different site.

The previous version of this guidance allowed any affected scope certificates active at that time to remain valid until expiry.

Conformity and Issue Date: 2022.12.12 Status: Issued

Calibration 80 Accepting Organic Inputs for OCS

References: OCS-101-V3.0 (C1.1)

**Situation:** Are all national organic standards accepted for OCS inputs? May organic inputs which have been processed after the farm be accepted for OCS?

**Interpretation:** The OCS allows first processors to accept organically grown material inputs from farms which are certified under one of the three categories listed (USDA NOP, Regulation (EC) 834/2007 & EU



## Calibration 80 Accepting Organic Inputs for OCS

2018/848, or IFOAM Family of Standards). A national organic standard which is not included in this list shall not be used to provide organically grown material inputs for OCS.

Sites further along the supply chain (i.e. not the first processor) may only accept inputs which are OCS certified or certified to a standard listed as equivalent for OCS in ASR-106 Accepted Equivalent Standards.

Conformity and Issue Date: 2022.12.12 Status: Issued

Calibration 192 Classification of a rented facility in the scope certificate?

References: CCS-101-V3.1 (C5.2)

**Situation:** A certified organization rents a facility for the washing process and pays all costs involved such as labor, utilities and materials. Is this facility a site or a subcontractor?

**Interpretation:** When the certificate holder rents a facility to conduct a process and pays for labor, overhead, and materials used, the facility will be considered a part of the organization and shall be listed in the Site Appendix on the scope certificate as a site, not a subcontractor.

Conformity and Issue Date: 2022.12.12 Status: Issued

Calibration 197 Certified Sites as Associated Subcontractors

References: CCS-101-V3.1 (C5.2)

**Situation:** May the scope certificate holder use a subcontractor who is independently certified to the same standard as an associated subcontractor?

**Interpretation:** A subcontractor facility that is independently certified to the same Textile Exchange standard shall not be listed as an associated subcontractor since they hold an independent scope certificate.

Conformity and Issue Date: 2022.12.01 Status: Issued



Calibration 190 Blending RDS/RAF material with recycled material of the same type

References: RDS-101-V3.0/RAF-101a-V2.2/RAF-101b-V1.2/RAF-101c-V1.0 (B2.1.1.b)

**Situation:** RDS and RAF fibers may be blended with recycled RDS or recycled RAF fibers for a labeled claimed product.

**Interpretation:** An RWS product that contains recycled wool may only qualify for labeling to the RWS if the product contains at least 5% RWS wool and 100% of the wool in the product is certified to either RWS or mixed with RCS or GRS certified wool. The same guidance may be applied for other RAF standards (e.g., blend of RMS and recycled mohair) and for RDS (blend of RDS and recycled down).

Conformity and Issue Date: 2022.09.23 Status: Issued

Calibration 168 Ineligible Reclaimed inputs - Silk Spinning Waste

References: GRS-201-V4.2/RCS-201-V2.2

Situation: Are "silk wastes" eligible for GRS/RCS certification as "pre-consumer material"?

**Interpretation:** Waste produced from a silk filament spinning process is regularly reused in the silk spun spinning process. Therefore, such waste does not qualify as reclaimed nor pre-consumer material, and the process does not qualify as recycling.

Therefore, only yarn hard waste as silk filament or silk spun yarns shall be considered as pre-consumer and only if the next processing step is recycling (e.g. mechanical shredding). Follow the calibration log 148.

If a certification body has previously issued a scope certificate for ineligible silk waste:

- a) the scope certificate may be maintained by the certification body until its expiry, and
- b) the certification body shall notify the client that their scope certificate cannot be renewed for this product.

No recertification is possible with material inputs which do not qualify as reclaimed, and any scope certificates with ineligible inputs issued after April 15, 2021 shall have the scope reduced to exclude ineligible inputs or shall be withdrawn immediately.

If the certification body is not sure if a reclaimed input is eligible or has not certified that reclaimed input before, they shall reach out to Textile Exchange for clarification prior to including it in the scope of GRS or RCS certification. If Textile Exchange or the AB finds errors in this area where the certification body did not request guidance from Textile Exchange, the scope certificate shall have the scope reduced to exclude ineligible inputs or shall be withdrawn immediately.

Conformity and Issue Date: 2022.06.09 Status: Issued



Calibration 180 Assessment of Textile Exchange logo use by CBs

References: ASR-101-V2.1 (C4.6)

**Situation:** It is not clear in the ACP what ABs shall check in their assessment of CBs regarding CB use of the Textile Exchange logo and CB adherence to the Claims Policy.

Interpretation: A certification body becomes authorized to use of the Textile Exchange standard logo(s) when the certification body licensing contract for the applicable standard has been signed with Textile Exchange (see TE-301-V1.2 Standards Claims Policy, section C2.5). The certification body may use a placeholder for the Textile Exchange standard logo (e.g. "logo goes here") to demonstrate conformity of logo use for assessment by their accreditation body prior to the certification body licensing contract being signed.

The accreditation body shall evaluate certification body conformance with C2.3, C2.4, and C2.5 of TE-301-V1.2 Standards Claims Policy during their assessments of the certification body.

Conformity and Issue Date: 2022.06.08 Status: Issued

Calibration 182 Certified organization becomes ineligible

References: CCS-101-V3.1 (B4)

**Situation:** A company becomes either banned by Textile Exchange or the United States government sanctions a company, product, or input which results in the company becoming ineligible for certification.

**Interpretation:** In the event that a previously certified component, product, shipment, or site is identified as restricted, and therefore ineligible for certification, the certification body:

- a) Shall immediately notify Textile Exchange and withdraw the related scope certificate(s) of such ineligible entity(ies);
- b) Shall cease all related certification activities within the prescribed timeline provided by Textile Exchange;
- Shall notify the certification body of any buyer of the identified ineligibility and any resulting withdrawal if any related transaction certificate(s) has been issued during the validity period of the scope certificate;
- d) Shall not issue transaction certificates for products at the first processor that have become ineligible for certification immediately upon becoming ineligible. For products already certified



### Calibration 182 Certified organization becomes ineligible

prior to becoming ineligible, the certification body may consider them to be certified unless specifically identified by Textile Exchange to be considered ineligible immediately; And

e) Shall not issue transaction certificates for ineligible products after six months of becoming ineligible.

NOTE: This applies only to outputs of any process that is not the first processor (see item D).

Conformity and Issue Date: 2022.06.08 | Status: Issued

Calibration 187 Mulesing using the ring method

References: RWS-101a-V2.2 (AW3.11)

**Situation:** Wool producers in Victoria, Australia, are using rubber rings (the kind used for castration) to remove excess skin from the breech area of sheep and give the same effect as standard mulesing. The skin will be pulled tight and the ring applied to stop the flow of blood and the skin dies and drops off. It will give chronic rather than acute pain to the sheep.

This technique falls into the definition of mulesing in the RWS, so it is prohibited.

**Interpretation:** AW3.11.1 Freeze mulesing (steining) and any other form of breech modification is prohibited.

Conformity and Issue Date: 2022.06.08 Status: Issued

Calibration 177 Minimum months of records for Initial audit

References: CCS-201-V3.0 (C4)

**Situation:** How many months of records (such as production, attendance, payroll, etc.) should the facility have before a GRS audit can be conducted if a facility was just established?

**Interpretation:** If a brand new facility is being certified, at least three months of operation records are needed to ensure a proper CCS and/or GRS audit.

Conformity and Issue Date: 2022.04.28 Status: Issued



Calibration 23 Transition Between Standard Versions

References: ASR-101-V2.1 (D4.4.2)

Situation: Transition from old standard version to new version.

**Interpretation:** Certified organizations shall be in conformity with updated standards or requirements as of the mandatory implementation date (typically one year after publication in the case of a standard). The certification body shall check conformity to the updated standard or requirements as of the next regularly scheduled audit.

**UPDATE**: Certification bodies shall inform their clients of the mandatory implementation date for applicable new standards or requirements.

**UPDATE**: Organizations audited on or after the mandatory implementation date shall operate in conformance with and be subject to the criteria of both documents which will include any unannounced audits.

Conformity and Issue Date: 2022.03.14 Status: Issued

Calibration 149 Restricted Chemicals in Fiber Production

References: GRS-101-V4.0 (D2.2)

**Situation:** Textile Exchange has identified that a number of chip, fiber, and filament producers have been certified to the GRS while using restricted chemicals. Textile Exchange has further identified that in many cases there might be no alternative chemical available, and that the requirements of GRS Section D might be so strict as to effectively exclude particular fibers from the GRS system unintentionally.

**Interpretation:** If the site uses any of the listed restricted chemicals in a chip, fiber, or filament production process, the scope certificate shall be withdrawn or downgraded to RCS immediately. This includes but is not limited to the following chemicals and fibers:

- 1. DMAC (Dimethylacetamide/ Dimethylacetamide) in elastane/spandex; and
- 2. Antimony trioxide and Cobalt (II) Acetate Tetrahydrate in polyester.

The details of how these chemicals may be used in certified products in the future will be considered in the unified standard development process.

NOTE: A previous exception was included in this calibration for scope certificates issued on or before April 15, 2021. All such scope certificates have now expired so that exception has been removed.

Conformity and Issue Date: 2022.01.31 Status: Issued



Calibration 161 Collectors and Concentrators Outside of CB's Geographic Scope

References: GRS-201-V4.2/RCS-201-V2.2 (A4)

**Situation:** If a certification body has a limited geographic scope of operations, may the certification body's material recycler clients source from collectors or concentrators which are located outside of the geographic scope?

**Interpretation:** All collectors and concentrators shall be located within the geographic scope of the material recycler's certification body unless one of the following options applies:

- 1. The collector or concentrator is independently certified to the RCS or GRS; or
- 2. The certification body outsources all required evaluation of the collector or concentrator to a certification body who is accredited for the RCS and/or GRS with a geographic scope which includes the collector or concentrator's location.

Conformity and Issue Date: 2022.01.31 Status: Issued

Calibration 173 RAF GIS Farm Questions: Elimination of Excel submission option.

References: RAF-102-V2.1 (D1.2.1.b)

**Situation:** RAF-102-v2.01, D1.2.1b requires data submission of Farm Questions using an online survey form or an Excel file. This requirement is mandatory as of January 1st, 2022. Textile Exchange made both options available as it was unknown whether the ArcGIS system would be ready by then.

As the system was made ready by January 1st, 2022, the Excel file option will no longer be an alternative because it cannot be linked to the automated features of dTrackit, thus requiring manual processing and delays. The system will no longer accommodate manual submission of this information via Excel after March 31st, 2022, so the focus will be on implementing only automated data collection methods.

**Interpretation:** The certification body shall report a set of Farm Questions for each certified farm (including each member in the case of Farm Group Certification and Communal Farmer Group Certification). The certification body shall ensure all questions are complete and accurate prior to submission.

The options available for submission and with mandatory implementation date no later than April 1st, 2022 are:



#### Calibration 173 RAF GIS Farm Questions: Elimination of Excel submission option.

- 1. The online survey form, using the custom link provided to the certification body.
- 2. A mobile app with a convenient offline feature which allows entering data and submitting it later if there are internet connectivity issues.

Conformity and Issue Date: 2022.01.26 Status: Issued

Calibration 170 Removal of sheep from natural pasture

References: RWS-101a-V2.2 (AW5.7, AW2.14, AW2.11, AW3.2, LM1.1)

**Situation:** Australian dry weather conditions affect the pasture ground cover in farms, forcing the farmer to practice continuous confinement feeding as a regular farming practice.

Each year, sheep are held off pasture in a confinement yard for a period of time, usually summer or autumn seasons. The animals cannot demonstrate natural behaviors and have welfare conditions (5 freedoms), and the farmer feeds them with supplementary hay, anipro, and barley.

Challenges can arise when the farm uses confinement yards as a management tool rather than as a contingency plan, as the RWS standard specifies.

The auditors are signaling confinement feeding as a major non-conformity, but the farmers find it very difficult to stop this practice under the current weather conditions in Australia.

Interpretation: The RWS-101a -v2.2 Responsible Wool Standard recognizes in Section C Animal Welfare the need to provide the flock with access to natural graze as an integral part of their living environment (AW2.11) and establishes the requirement to have a pasture-based system for sheep. The only exception is when an emergency or severe weather conditions such as droughts, floods, fires, heavy snowfall, etc., would otherwise negatively impact sheep welfare and affect the amount of pasture available for sheep or keeping a healthy soil base for it.

The CB shall use the following criteria to assess if the farmer complies with the RWS principles when removing sheep from natural pasture. The farmer needs to meet ALL clauses to be considered compliant with AW2.11:

The farmer has a written document that explains the type of emergency or severe weather
affecting the farm and forcing the removal of sheep from natural pasture, including a detailed
management plan that guarantees sheep welfare, as per AW5.7. This clause also covers
situations like weather conditions resulting from the change of seasons, which can affect soil and



## Calibration 170 Removal of sheep from natural pasture

animal health. Thus, it requires the written plan to have actions on land management (LM1.1) and animal health (AW3.2).

- 2. The farm establishes a correct and effective stocking rate and follows it, as per AW2.14. The proper management of this rate can provide, for the most part, enough in-farm produced hay/forage to feed the flock during periods when removed from natural pasture.
- 3. The farm keeps records of the duration and justification of each emergency or severe weather occurrence that led to removing sheep from natural pasture. Justification may involve information such as weather data, soil moisture deficits, pasture vegetation cover measurement, predator monitoring etc.

Conformity and Issue Date: 2022.01.11 Status: Issued

Calibration 164 Collectors and Concentrators - Additional verification & physical

inspection

References: GRS-201-V4.2/RCS-201-V2.2 (A4)

**Situation:** The GRS Implementation Manual V4.2 A4 states that "Certification bodies shall keep a list of all collectors and concentrators that supply to recycling clients. 10% of this total shall be chosen for additional verification, with 2% chosen for physical inspection."

It is not clear that if the percentages selected for additional verification should be determined per certification body, per certified organization, or on another basis.

**Interpretation:** The sampling of collectors and concentrators (10% additional verification and 2% physical inspection) shall be determined per certification body and is always rounded up. The 2% sample for physical inspection may be counted towards the 10% sample for additional verification.

Example: A certification body has certified 50 GRS material recyclers (mechanical, chemical, and/or biological) in total. Each recycler has one collector and one concentrator. As a result, the certification body will have 50x1 + 50x1 = 100 collectors/concentrators. The certification body therefore needs to select 10% of 100 = 10 collectors/concentrators for additional verification and 2% of 100 = 2 collectors/concentrators for physical inspection.

Conformity and Issue Date: 2021.09.22 Status: Issued



Calibration 159 Physical Possession

References: CCS-101-V3.0 (B1)

**Situation:** In the CCS we say that traders without physical possession of product do not have to be certified. We occasionally get questions about what 'physical possession' means. Can you draft a calibration for that and let us know what it is so we can add that as a future update to the User Manual as well?

**Interpretation:** Physical possession of goods is the physical custody or control of goods in material form. It is different from ownership of goods, where an entity acquires the proprietary rights over the goods.

For example, when a processor sends materials to a subcontractor, they merely transfer the physical possession and not the ownership of materials. Here, the processor is the owner of the materials but does not have physical possession of materials, and the subcontractor has physical possession of materials but is not the owner.

Different actors in the supply chain such as processors, wholesalers, distributors, and retailers usually take physical possession of materials and products. Others, such as traders, do not take physical possession due to their intermediary function. Brands sometimes take physical possession depending on the setup of their commercial operations. Textile Exchange standards intend to cover the different arrangements among supply chain participants while guaranteeing the integrity of the verified materials and products.

Conformity and Issue Date: 2021.09.03 | Status: Issued

Calibration 155 CNCA Registration and Freelancers

References: ASR-101-V2.1 (D1.1.3, D3.2.6.f)

**Situation:** May a certification body contract with auditors who work for an entity registered with CNCA but which is not accredited to ISO 17065 as a way to meet the Chinese legal requirement for CNCA registration?

**Interpretation:** Any independently owned entity which holds registration with CNCA for the purpose of a certification body operating legally in China is considered to be a subcontractor of the certification body and is therefore required to hold ISO 17065 accreditation. Freelancers in China may be hired by a certification body or certification body subcontractor which holds CNCA registration.

Conformity and Issue Date: 2021.07.26 Status: Issued



Calibration 151 Organizations Between Farm and First Processor for RAF

References: RAF-101a-V2.1/RAF-101b-V1.1/RAF-101c-V1.0 (B1.3)

**Situation:** In some countries, "brokers" take possession of animal fiber in between the farm and the first processor, often to facilitate a sale at auction. It is unclear if these brokers require certification.

**Interpretation:** Organizations which take legal ownership of animal fiber in between the farm and the first processor are required to be certified to the standard, except where the applicable version of the CCS allows for an exception to certification. If an organization takes physical possession of the animal fiber (i.e. for storage) but not legal ownership, the organization shall be treated as a subcontractor by whoever owns the animal fiber while it is being stored (typically the farm or ICS).

If the organization arranges for the sale of wool (e.g. at auction) and charges a service fee to the farm, they are not considered to take legal ownership even if they receive payment for the animal fiber and remit it to the farm. In this case, the organization would be considered to be a broker. If the organization purchases the animal fiber from the farm for a set price, they are considered to take legal ownership.

Conformity and Issue Date: 2021.06.04 Status: Issued

Calibration 145 CB Translations of Documents

References: ASR-101-V2.1 (D1.8.1)

**Situation:** May certification bodies prepare translations of Textile Exchange standards or other Textile Exchange documents to share with their non-English speaking clients?

**Interpretation:** Certification bodies may publish their own translations of Textile Exchange Standards and other documents, provided the following conditions are met:

- Textile Exchange has not published an official translation of the document in the target language. Any certification body translations shall be discontinued if Textile Exchange publishes an official translation.
- 2. A copy of the translated document shall be provided to Textile Exchange by email to Assurance@TextileExchange.org.
- 3. For documents in Chinese or Spanish, the certification body shall wait for approval from Textile Exchange before publishing the document.
- 4. Documents shall not copy any photos used in the original Textile Exchange document. Explanatory graphics may be copied.



#### Calibration 145 CB Translations of Documents

- 5. Documents shall include the text "Unofficial translation prepared by <CB NAME(S)>". This text shall appear in English on the first page and in the target language on every page.
- 6. Certification bodies working in the same region or language are encouraged to collaborate on translations to improve consistency.
- 7. Where Textile Exchange provides a glossary of translated terms in the target language, the provided terms shall be used.

Conformity and Issue Date: 2021.03.22 Status: Issued

Calibration 134 USDA NOP Eligibility

References: OCS-205-V2.1 (Box 15)

**Situation:** How should the certification body of a supply chain organization (not a first processor) determine the answer to the question "Certification of the organic material used for the products listed complies with USDA NOP rules"?

**Interpretation:** For supply chain companies after the first processor, OCS Material is considered to comply with USDA NOP rules if all of the incoming OCS Material complies with USDA NOP rules, as indicated on the incoming transaction certificate. If any of the incoming OCS Material cannot be confirmed to comply with USDA NOP rules (i.e. 'No' is checked for this box on the incoming TC), 'No' shall be selected.

Checking 'Yes' on this box indicates that all listed products comply with USDA NOP rules. Products from the same shipment may be divided into separate TCs if necessary to allow for this.

Conformity and Issue Date: 2021.01.18 Status: Issued



Calibration 131 Non-NPOP Seed Cotton in India

References: OCS-101-V3.0 (C1.1)

**Situation:** Can non-NPOP seed cotton from India be accepted in the OCS supply chain at the ginning stage, if it is certified to another standard that is approved under IFOAM Family of Standards?

**Interpretation:** Since organic fibers are covered under NPOP and to meet national regulations, any organic fibers originating from India must be certified to NPOP as a basic requirement, to be accepted as OCS Material. Other certifications such as NOP may also be in place for the fibers.

Conformity and Issue Date: 2021.01.18 Status: Issued

Calibration 136 Definition of "Lot"

References: RAF-101a-V2.1/RAF-101b-V1.1 (G1.7.3)

**Situation:** What is referred to by the word "lot" for the purposes of G1.7.3 in the RAF standards? Is it acceptable for a farm group to outsource the storage of bales of wool which may be combined into lots for sale?

**Interpretation:** The word "lot" in G1.7.3 of the RAF standards refers to any discrete, identifiable unit of fiber which cannot be accidentally mixed with other lots.

Conformity and Issue Date: 2021.01.15 Status: Issued

Calibration 112 Sufficient Personnel

References: ASR-101-V2.1 (D3.1.1)

Situation: What is a sufficient number of personnel based on the number of scope certificates?

**Interpretation:** The number of personnel needed for a certification body with a set number of scope certificates will vary depending on the circumstances. In determining the number of personnel needed, the certification body should consider:

- 1. The time required to conduct each audit (including audit time, travel, planning, and reporting), as well as the review/certification decision;
- 2. The time required for administrative functions (e.g. issuing SCs, TCs, and claims approvals; closing NCs) per scope certificate;
- 3. The percentage of each person's time which is dedicated to Textile Exchange standards;



#### Calibration 112 Sufficient Personnel

- 4. Time spent on training and general administrative tasks; and
- 5. Full-time working hours after regular time off.

The number of personnel should not be less than 1 full-time equivalent person per 100 scope certificates, and this will typically not be sufficient.

Conformity and Issue Date: 2021.01.14 Status: Issued

Calibration 74 Scope of Processes for GRS Chemical Requirements

References: GRS-101-V4.0 (D2)

**Situation:** Are processes that do not "add" to the product (e.g. spin finishes for yarn) included in the scope of evaluation for chemicals according to the GRS?

Interpretation: Spin finishers (and processing aids) are still considered to be part of the scope of the GRS. The GRS does not make a distinction between products that are "added to the product," but uses the phrase: "GRS criteria for the use of chemicals that may be used in the production of GRS products are based on the following main requirements..." GRS chemical rules are applicable to all certified materials, as well as any non-certified materials once they are blended into a certified product and to any other inputs used during production.

Conformity and Issue Date: 2021.01.14 Status: Issued

Calibration 128 RAF ICS in a Different Country

References: RAF-101a-V2.0/RAF-101b-V1.0 (F1.3)

**Situation:** May an RAF farm group ICS be located in a different country than the farms, provided that necessary management oversight is maintained?

**Interpretation:** The ICS location for a farm group shall be in the same country as the farms. If the certified organization's main operation is in another country, it may be included as a subsequent site in the scope certificate and may be involved with the work of the ICS.

Conformity and Issue Date: 2020.12.15 Status: Issued



Calibration 116 Reclaimed Fur

References: GRS-101-V4.0/RCS-101-V2.0 (A3.1b)

Situation: May reclaimed fur be accepted as an input for GRS or RCS?

**Interpretation:** Post-consumer reclaimed fur may be accepted as an input for GRS or RCS. Preconsumer reclaimed fur is outside the scope of the standards.

Conformity and Issue Date: 2020.11.09 Status: Pending Retirement (2025.10.01)

Calibration 103 Withdrawing SCs that were issued only as Electronic certificates

References: ASR-101-V2.1 (D1.1.14a)

**Situation:** A certification body uses only electronic certificates, which causes the certification body to lack provisions to comply with requirement D1.1.14a to have clients return all copies of certificates (as no physical certificates are issued).

**Interpretation:** In the case of suspension or withdrawal of a scope certificate, the organization's obligations under D1.1.14a are considered to be met if the original scope certificate (if issued as a physical document) is returned to the certification body and all electronic or printed copies of the scope certificate are destroyed.

Conformity and Issue Date: 2020.10.29 Status: Issued

Calibration 65 Recycled Down and Feathers

References: GRS-101-V4.0/RCS-101-V2.0 (A1)

**Situation:** A down recycler purchases reclaimed down which has been through a light "pre-wash" process. The recycler's washing process is considered to be the recycling process. Does the supplier require RCS/GRS certification?

**Interpretation:** If the reclaimed down supplier is purchasing down from a collector, the supplier needs to be RCS/GRS certified. If the supplier is acting as a collector, the certification body may agree for the down recycler to accept a Reclaimed Material Declaration Form from the supplier.

Conformity and Issue Date: 2020.08.27 Status: Pending Retirement (2025.10.01)



Calibration 89 Use of Expired Organic Food

References: OCS-101-V3.0 (C1.1)

**Situation:** May organic expired/non-saleable food products (e.g. collected from grocery stores) be accepted as inputs for OCS?

**Interpretation:** Food waste which is used as a feedstock for a non-food/feed manufacturing process may be accepted as an OCS input if the following apply:

- 1. The product was intended for use as food/feed and is a waste product from the supply chain or the end user;
- 2. The organic status of the product shall verified through one of the following methods:
  - a. A supply chain transaction certificate from an accepted organic standard; or
  - b. A packaged product which carries an organic label from an accepted organic standard, and where the scope certificate for the final processor (as identified on the packaging) is confirmed.

In this case, the processor accepting the food waste shall be considered to be the first processor. Accepted organic standards are identified in OCS 3.0 C1.1.

Conformity and Issue Date: 2020.08.27 Status: Issued

Calibration 73 Auditors conducting audits of the same organization in consecutive years

References: ASR-101-V2.1 (D1.2.13c)

**Situation:** If there are multiple auditors on an audit team, does the limit of three consecutive years apply to all auditors or only to the lead auditor?

**Interpretation:** The requirement for an auditor to not audit the same organization in more than three consecutive years applies to all auditors.

Conformity and Issue Date: 2020.07.16 Status: Issued



Calibration 70 Clarification on Shadow Audit Requirements

References: ASR-101-V2.1 (D3.1.5e, f; D3.1.6b, D3.1.6c)

**Situation:** May certification bodies perform one shadow audit to the more complex standard (e.g. GRS) and consider this to cover as a shadow audit for all other standards (e.g. CCS, RCS, OCS)?

**Interpretation:** Auditor qualification scopes are intended to mirror accreditation scopes. Any audit which includes the CCS (all except farms) may meet the shadow audit requirement for CCS auditor qualification. A GRS audit at a material recycler may meet the shadow audit requirement for RCS auditor qualification. GRS/RCS audits may not be used to complete OCS qualification, or vice versa.

Conformity and Issue Date: 2020.07.16 Status: Issued

Calibration 67 Freedom of association and collective bargaining

References: GRS-101-V4.0 (B2.4)

**Situation:** Is the client required to have some form of elected worker representation? E.g. union, collective bargaining agreement, or worker committee.

**Interpretation:** The intent of this requirement is to ensure that unions and other forms of worker organization are not blocked/actively avoided. There is no requirement that one be in place if the workers have not chosen to do so.

Conformity and Issue Date: 2020.07.16 Status: Issued

Calibration 94 Combined Audit Checklists

References: ASR-101-V2.1 (D4.4.19)

**Situation:** May a certification body produce a combined checklist or report intended to address both a Textile Exchange standard and another standard? What approval for this is needed?

**Interpretation:** A certification body may produce a combined checklist or report template intended to address both a Textile Exchange standard and another standard, provided that all required elements for the Textile Exchange standard are included. No special approval is needed, though the checklist or template shall be evaluated by the accreditation body during the next office assessment.

Conformity and Issue Date: 2020.07.16 Status: Issued



Calibration 78 Certification of Ocean Waste

References: GRS-101-V4.0/RCS-101-V2.0 (A1)

**Situation:** Some organizations wish to claim reclaimed ocean waste (waste collected from in or near oceans) specifically on GRS and RCS transaction certificates. Standard requirements do not validate that the plastic is in fact ocean plastic.

**Interpretation:** Reclaimed ocean waste is defined as material which has been reclaimed from oceans and/or from shorelines (within 0.2 km of the water level at low tide or the water level at high tide, whichever is higher). Materials from municipal recycling systems may not be included as reclaimed ocean waste.

No claims relating to reclaimed ocean waste may be included on transaction certificates unless the following conditions are met:

- 1. The collector, concentrator, and all handlers are either RCS or GRS certified.
- 2. In this case, the material recycler may accept an incoming RCS transaction certificate to produce a GRS product.
- 3. All material is confirmed to be reclaimed ocean waste during audits of the collector and concentrator.
- 4. "Reclaimed ocean waste" may be mentioned on Box 15 of the transaction certificate. It may not be mentioned on the scope certificate.
- 5. For sites after the material recycler, reclaimed ocean waste is indicated on the incoming transaction certificate. And
- 6. Public-facing claims relating to reclaimed ocean waste are not associated with the RCS or GRS standard names or logos.

NOTE: This issue has been identified for reconsideration by the International Working Group during the next RCS and GRS revision process.

Conformity and Issue Date: 2020.07.08 Status: Issued



Calibration 88 Use of Expired Food as Recycled

References: GRS-101-V4.0/RCS-101-V2.0 (A1)

Situation: May expired/non-saleable food products (e.g. collected from grocery stores) be accepted as

recycled inputs?

**Interpretation:** Food waste which is used as feedstock for a (non-food) recycling process may be accepted as an input for GRS or RCS. If the food waste is collected in the supply chain (e.g. from grocery stores) it shall be considered to be pre-consumer.

Conformity and Issue Date: 2020.07.07 Status: Pending Retirement (2025.10.01)

Calibration 62 Oligomer Recycling

References: GRS-101-V4.0/RCS-101-V2.0 (A1)

**Situation:** There is a lack of clarity regarding oligomer recycling. Previous guidance from Textile

Exchange did not allow oligomers to be considered reclaimed/recycled.

**Interpretation:** Oligomers produced during processing may be accepted as a reclaimed input under GRS and RCS. If the oligomers are purchased by a recycler they may be considered to be pre-consumer.

Conformity and Issue Date: 2020.07.02 Status: Issued

Calibration 10 Generating Pre-Consumer Waste

References: GRS-101-V4.0/RCS-101-V2.0 (A1)

**Situation:** Pre-consumer waste that is collected from a production stage and then used again in the same production stage may undergo processing steps that meet the definition of "recycled material".

**Interpretation:** Production wastes may only be considered to be pre-consumer reclaimed material if they are reprocessed through a recycling process at a site with 'recycling' included as a process in its scope.

Conformity and Issue Date: 2020.06.30 Status: Pending Retirement (2025.10.01)



Calibration 45 Re-Recycling of Post-Consumer Materials

References: GRS-101-V4.0/RCS-101-V2.0 (A1)

Situation: Can waste from post-consumer recycling activities still be considered post-consumer waste?

**Interpretation:** Post-consumer recycled material which is put through an additional (pre-consumer) recycling process may continue to be considered post-consumer, provided that the percentage of post-consumer content can be accurately determined. If the percentage of material which is post-consumer prior to the final recycling process cannot be accurately determined, the material shall be considered to be pre-consumer.

Conformity and Issue Date: 2020.05.30 Status: Pending Retirement (2025.10.01)

Calibration 64 Shadow Assessment Definition

References: ASR-101-V2.0 (C4.6.3b, C4.6.4b, C4.6.8)

**Situation:** Clarity needed regarding definition of a Shadow Assessment - do these mean strictly witness audits or also include review audits?

**Interpretation:** References to accreditation body shadow assessments refer to witness audits as defined in the situation. Review audits are a valuable tool, but Textile Exchange also believes that it is important to observe how the certification body auditor conducts the audit.

The minimum frequency for shadow assessments is one per two years per standard, and we know that in many circumstances accreditation bodies are conducting more shadows than this. After the minimum number of shadow assessments is met, review audits as described may be used.

IOAS definitions used in this calibration:

- Witness Audits accreditation body assessor observes certification body's auditor(s) at work; assessor and auditor(s) have an introductory meeting prior to the audit, and an exit meeting for feedback and clarification of any questions after the audit, neither meeting involving the audited organization; assessor will not speak during the audit but may take notes. Witness audits should be full audits.
- Review Audits accreditation body assessor visits the organization and verifies information from
  the certification body's latest audit report and certification decision; it includes interviewing the
  operator or the person who was present for the last inspection, reviewing records, and a physical
  visit to the premises. Duration may vary according to operation size and complexity but is not
  expected to be a full repeat audit.



## Calibration 64 Shadow Assessment Definition

The auditor that conducted the reviewed audit is not required to be present; certification body is strongly encouraged to have a certification body representative accompanying the assessor during the Review Audit to witness it but shall not interfere with the assessor's work in any sense.)

Conformity and Issue Date: 2020.02.20 Status: Issued