

GLOBAL ORGANIC TEXTILE STANDARD ECOLOGY & SOCIAL RESPONSIBILITY

# Procedure For The Certification Of Small-Scale Operators In Low-Risk Countries

### Controlled Supply-Chain Certification Scheme (CSCS) for the Global Organic Textile Standard (GOTS)

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#### ABOUT GLOBAL STANDARD AND GOTS

Global Standard gemeinnützige GmbH is a not-for-profit organisation incorporated in Germany in 2002 for the purpose of administrating the Global Organic Textile Standard (GOTS).

#### Vision

Our vision is a world where all textiles are produced in accordance with the principles of health, ecology, fairness and care to enhance people's lives and the environment. Organic textiles are an integral part of this holistic approach.

#### Mission

Our mission is to ensure the highest level of social and environmental impact in textile value chains through voluntary sustainability standards and related activities.

We fulfil our mission by development, implementation, verification, protection, and promotion of global Voluntary Sustainability Standards (VSS) for textiles. Based on our successful Global Organic Textile Standard (GOTS) system and amplifying impact, these standards stipulate requirements throughout the supply chain for ecological, human rights including social criteria and business conduct in textile and apparel manufacturing. We define sustainable materials and practices based on robust scientific findings, ensuring our standards are credible, effective and impactful.

#### Disclaimer

GOTS is a voluntary standard and does not intend to replace any legal or regulatory requirements of any country.

British English is the official language of Global Standard.

#### **Document Revision History**

Procedure for the Certification of Small-Scale Operators in Low-Risk Countries v 1.0 - released in May 2025

#### How to Read This Document

The following verbs are used to indicate requirements, recommendations, permissions, or capabilities in this document:

- "shall" indicates a mandatory requirement
- "should" indicates a recommendation
- "may" indicates a permission
- "can" indicates a possibility or capability

Implementation deadline: This document can be implemented immediately.

#### Availability of Documents:

Procedure for the Certification of Small-Scale Operators in Low Risk Countries v 1.0 is available for public download on the GOTS website

Further information is available at: www.global-standard.org.



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## 1 CHARACTER AND PURPOSE OF THE CONTROLLED SUPPLY CHAIN SCHEME (CSCS)

- 1.1 Small-scale operator groups that form part of the supply chain in organic textile processing and manufacturing in low-risk countries currently face substantial costs and administrative complexities related to certification under the Global Organic Textile Standard (GOTS).
- 1.2 To prevent their exclusion from such certification, mitigate inspection and certification expenses, reduce administrative burdens, and enhance awareness and compliance with GOTS across the supply chain, a Controlled Supply Chain Scheme (CSCS) is introduced as part of GOTS.
- 1.3 This procedure is not intended to dilute the requirements of GOTS, but to facilitate a simpler certification possibility for committed small-scale operators. All requirements of GOTS remain valid for the production of GOTS certified goods.

### 2 SCOPE AND MECHANISM OF CSCS

- 2.1 The CSCS applies to supply chains comprising a minimum of four (4) and a maximum of thirty (30) small-scale facilities, each employing 20 or fewer workers, located in low-risk countries. Such a supply chain may apply for the CSCS and, subject to risk assessment by their Certification Body (CB), may be recognised as a single Certified Entity.
- 2.2 A facility, as defined herein, refers to any individual establishment where processing, manufacturing, trading, or retailing of GOTS goods occurs. Facilities may be independently, wholly or partially owned by the CSCS Scope Certificate holder, and are subject to inspection by a GOTS-approved certifier. A facility may also encompass offices, warehouses, or accounting establishments.
- 2.3 An official document, such as an *"Agreement*", outlining the internal organization and listing appointed individuals, shall be executed by all legal entities within the CSCS. This document shall be submitted to the CB as part of the application process.
- 2.4 An organisation seeking certification under this procedure shall have at least one qualified inspector capable of conducting internal audits within the CSCS supply chain.
- 2.5 Internal inspectors shall conduct audits of the overall supply chain instead of CB inspectors. Upon completion, the audit reports shall be submitted to the CB via the *Supply Chain Manager* (*SCM*) (see 3.2.1).
- 2.6 The CB shall review the submitted documentation to validate the internal inspection process and ensure conformity to GOTS. Successful evaluations may lead to certification.



- 2.7 For the initial certification under CSCS, the SCM shall submit internal inspection reports along with the certification application.
- 2.8 For recertification in subsequent years, the SCM shall submit annual internal inspection results from the prior year. In cases of serious non-conformities in the prior year, the SCM shall report to the CB promptly rather than waiting for the next annual report.
- 2.9 The implementation and promotion of the CSCS within the supply chain are the responsibilities of key personnel (see 3.2): the *Manager* of each facility, the *SCM* overseeing the CSCS, and the *Internal Inspector(s)* responsible for inspections.
- 2.10 A Supply Chain Officer (Group Leader) may be appointed to support the SCM, depending on the size and complexity of the supply chain.
- 2.11 The qualifications and experience requirements for key personnel of the CSCS shall be appropriate with education, training, support, onboarding, and capacity building considered as essential components.
- 2.12 All key personnel shall be part of the senior management team of the individual facilities.
- 2.13 It is not mandatory for all key personnel roles to be occupied by separate individuals.

## 3 DETAILS OF CSCS

### 3.1 SUPPLY CHAINS AND FACILITIES COVERED BY CSCS

- 3.1.1 The CSCS shall only apply to supply chains consisting of 4 to 30 small textile processing and manufacturing facilities located in low-risk countries<sup>1</sup>, that intend to and have the capacity to participate in the internal inspection system under CSCS.
- 3.1.2 Eligible facilities shall employ 20 or fewer<sup>2</sup> workers, including part-time employees. Seasonal part-time workers<sup>3</sup> shall be excluded from this count.
- 3.1.3 Facilities with more than 20 employees shall not be considered eligible for inclusion in the CSCS.

<sup>&</sup>lt;sup>1</sup> Low-risk countries related to social and labour conditions. ILO indicators and reports, Global Rights Index by the International Trade Union Confederation (ITUC), UN Human Development Index, Global Slavery Index and OECD Guidelines for Multinational Enterprises may be referred to identify countries with relatively high labour standards and protections.

<sup>&</sup>lt;sup>2</sup> While definitions of small-scale operators may differ globally, this is considered to be the most common indicator of a small-scale operation.

<sup>&</sup>lt;sup>3</sup> Small-scale operators often employ part-time workers during peak seasons (such as Christmas). These may be excluded from the count of workers for CSCS. These workers shall be provided the same consideration as permanent employees related to working conditions.



# 3.2 ROLES OF KEY PERSONNEL

To facilitate the promotion and implementation of the CSCS, key personnel shall be appointed with specific roles as outlined below:

### 3.2.1 SUPPLY CHAIN MANAGER (SCM)

- 3.2.1.1 The Supply Chain Manager (SCM) shall be responsible for the overall management of the entire supply chain.
- 3.2.1.2 The SCM shall establish the policies, objectives, and timelines for GOTS conformity and promote adequate understanding of GOTS criteria within the supply chain.
- 3.2.1.3 The SCM shall evaluate internal inspection reports submitted by the Internal Inspector and, if necessary, implement corrective actions.

### 3.2.2 SUPPLY CHAIN OFFICER (SCO)

- 3.2.2.1 Depending on the size of the supply chain, a Supply Chain Officer (Group Leader) SCO may be appointed to support the SCM by supervising a group of categorised facilities.
- 3.2.2.2 The SCO shall manage all facilities in their group, disseminate the SCM's compliance policies, goals, and timelines, and ensure production activities conform to GOTS criteria.
- 3.2.2.3 The SCO shall evaluate internal inspection reports and ensure corrective actions are taken if necessary.

#### 3.2.3 FACTORY MANAGER (FM)

- 3.2.3.1 A Factory Manager (FM) shall be appointed to manage each operator and ensure GOTS compliance within their facility.
- 3.2.3.2 The FM shall supervise the facility according to the policies, objectives, and timelines set by the SCM/SCO and shall implement corrective actions based on findings from internal inspections.

#### 3.2.4 INTERNAL INSPECTOR (II)

- 3.2.4.1 The Internal Inspector (II) shall be responsible for inspecting the supply chain to verify that production activities comply with GOTS criteria (e.g. environmental, chemical, and social) and relevant GOTS policies (e.g. Conditions for the Use of GOTS Signs).
- 3.2.4.2 The II shall use a checklist provided by the respective CB and submit inspection reports to the SCM/SCO and CB.
- 3.2.4.3 An II may only be appointed after successfully completing a training course designated by the respective CB.
- 3.2.4.4 An II shall have at least 2 years of experience in the textile sector with formal training on ISO 19011 ("Guidelines for Auditing Management Systems") and GOTS.



# 3.3 INTERNAL INSPECTION PROCEDURE

Internal inspection procedures shall align with all GOTS requirements and shall effectively demonstrate supply chain management to the CB. The internal inspection procedure shall include the following essential elements and methods:

- 3.3.1 **Clear Policies and Goals:** The supply chain shall establish consistent policies for managing social norms, environmental compliance, product quality control activities, storage, and transportation.
- 3.3.2 **Establishment of the CSCS System**: The supply chain shall develop and maintain processing, storage, and transportation methods in conformity with GOTS, creating an implementation plan and a mechanism for monitoring compliance.
- 3.3.3 **Documentation of Roles and Material Flow**: The supply chain shall document its organisational structure, including the roles and qualification details of key personnel, material flow through each processing stage, and any processing-specific risks.
- 3.3.4 **Education and Training:** The supply chain shall develop and execute a specific plan for education and training to ensure compliance with GOTS.
- 3.3.5 **Internal Standards for Compliance:** The supply chain shall establish its internal standards (either supply chain-wide or per-facility) to ensure compliance with GOTS requirements.
- 3.3.6 **Inspection Schedule**: In the first year, all facilities are subject to in-person internal inspections by the internal inspector. In subsequent years, facilities are selected for random inspection at least once every five years based on risk assessment of the internal inspector. Inspections may be conducted in-person, remotely, or through desktop review depending on specific conditions.
- 3.3.7 **Role of Internal Inspection Report**: Inspection reports are evaluated by the SCM, with corrective actions implemented for non-conformities. The SCM shall promptly notify facility personnel of required corrective actions and monitor their implementation.
- 3.3.8 **Submissions to Certification Bodies**: The SCM shall compile inspection reports, including summaries of non-conformities and corrective actions. Annual reports shall be submitted in the format specified by the CBs, with major non-conformities reported immediately.

### 3.4 FUNCTIONS AND RESPONSIBILITIES OF CERTIFICATION BODIES

3.4.1 GOTS-approved CBs shall primarily be responsible for evaluating whether proper management is maintained within the controlled supply chain.



- 3.4.2 The primary focus shall be based on assessing the structure of the internal control system and the eligibility of the internal inspectors.
- 3.4.3 CBs shall conduct annual inspections in compliance with GOTS requirements of the certified entity.

#### 3.4.4 KEY RESPONSIBILITIES OF CBS INCLUDE:

- 3.4.4.1 **Evaluation of Control Systems:** CBs shall review and assess the implementation of internal control systems, traceability, and mass balance within the CSCS supply chain.
- 3.4.4.2 **Annual Inspection and Capability Assessment**: CBs shall evaluate the effectiveness of internal inspections by inspecting one tenth (1/10) of the total facilities listed on the Scope Certificate during the onsite annual inspection. The number of facilities inspected may increase depending on risk assessment results.
- 3.4.4.3 **Evaluation of Internal Inspection Reports**: CBs shall evaluate internal inspection reports and verify the implementation of corrective actions for identified non-conformities.
- 3.4.4.4 **Implementation of GOTS Policies:** CBs shall issue Scope and Transaction Certificates as needed as well as approve the use of GOTS Signs as per the Conditions for the Use of GOTS Signs.
- 3.4.5 Notwithstanding the above, the final decision and responsibility for certification or continuation thereof shall rest solely with the CB.

\* \* \* \* \*



# 4 ANNEX: GUIDE FOR INSPECTION OF CSCS FACILITIES

## 4.1 INTERNAL INSPECTIONS

Internal inspections shall be carried out based on the table below by the internal inspector:

<b>1-10</b> In-	-person	Minimum of 3 in-person/onsite inspections; others may be remote. For facilities that do not process GOTS Goods, desktop inspections are permitted.
<b>11-20</b> In-	-person	Minimum of 5 in-person/onsite inspections; others may be remote. For facilities that do not process GOTS Goods, desktop inspections are permitted
<b>21-30</b> In-	-person	Minimum of 6 in-person/onsite inspections; others may be remote. For facilities that do not process GOTS Goods, desktop inspections are permitted.

The main Certified Entity, the Scope Certificate holder, shall always be inspected inperson / onsite during the initial and the subsequent recertification processes.

## 4.2 INSPECTIONS BY THE CERTIFICATION BODY

4.2.1 The main Certified Entity, the Scope Certificate holder, shall always be inspected onsite by the Certification Body during the initial and subsequent recertification processes.

### 4.2.2 INITIAL CERTIFICATION / FIRST-YEAR AUDITS

4.2.2.1 For the first-year audit of the initial certification, the number of facilities inspected shall be as per the table below, where A is the total number of facilities in the CSCS supply chain.

Total Number of facilities (A)	Number of inspections
Less than 10	√A
Less than 20	√A
Less than 30	√A

- 4.2.2.2 After calculation, the number shall be rounded up to the nearest integer to determine the final number of inspections to be conducted.
- 4.2.2.3 At a minimum, each process sought to be listed on the Scope Certificate shall be audited at least once during an on-site audit. For example, if a CSCS applicant has six different garment manufacturing units, two weavers, one dyer, and one spinner, one of each process category operator shall be audited in the first year (one garment unit, one weaver, one dyer and one spinner).



### 4.2.3 RECERTIFICATION / SUBSEQUENT AUDITS

- 4.2.3.1 For the subsequent year audits for the recertification process, the minimum and maximum number of additional on-site inspections by CBs shall be calculated using the following table, where: A= total number of facilities in the CSCS supply chain (including the primary SC holder)
- 4.2.3.2 Minimum number of inspections

Total Number of facilities (A)	Number of inspections
Less than 10	1
Less than 20	2
Less than 30	3

#### 4.2.3.3 Maximum number of inspections

Total Number of facilities (A)	Number of inspections
Less than 10	√A
Less than 20	√A
Less than 30	√A

4.2.3.4 After calculation, the number shall be rounded up to the nearest integer to determine the final number of inspections to be conducted.

#### 4.2.3.5 Calculation Examples for recertifications / subsequent year audits

#### 4.2.3.5.1 Example 1

- Total Number of Facilities: 12 (A=12)
- Since the CB has determined the supply chain is well-managed, the minimum number of inspections shall be conducted.
- Calculation: Using the minimum number table above, the number of inspections conducted shall be 2.

### 4.2.3.5.2 Example 2

- Total Number of Facilities: 16 (A=16)
- Based on risk assessment, the CB decides to perform the maximum number of inspections.
- Calculation: Using the maximum number table above, the number of inspections shall be  $\sqrt{A}$

 $\sqrt{A} = \sqrt{16} = 4$ 

Hence the number of inspections to be conducted shall be 4.

### 4.2.3.5.3 **Example 3**

- Total Number of Facilities: 12 (A=12)
- Based on risk assessment, the CB decides to perform the maximum number of inspections.
- Calculation:



Using the maximum number table above, the number of inspections shall be  $\sqrt{A}$ 

 $\sqrt{A} = \sqrt{12} = 3.46$  - Rounded up to the nearest integer, this is 4.

Hence the number of inspections to be conducted shall be 4.

# 4.2.4 ADDITION OF A NEW SUPPLY CHAIN UNIT AFTER INITIAL CERTIFICATION OF THE CSCS

4.2.4.1 A new processing unit sought to be included in an existing scope certificate shall be audited for compliance before a scope certificate can be revised to include this new facility.

### 4.2.5 AUDITS AFTER THE RELEASE OF A REVISED VERSION OF GOTS

4.2.5.1 GOTS criteria are revised regularly, so to ensure the implementation of new requirements that may appear in revised versions, recertifications shall follow the requirements given in Section 4.2.2, with specific emphasis on Section 4.2.2.3.

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