



# Greenpeace Global Textile Procurement Standard<sup>1</sup>

## **Precautionary chemical management in textile procurement: version August 2021**

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<sup>1</sup> This standard was first adopted in April 2019, as a Trial Standard to allow a phased approach to implementing it with suppliers (versions 1 & 2 & 3). From this version (version 4) August 2021 onwards it is no longer under trial.

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## Introduction

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

The objective of this Standard is to ensure that natural fibre textile products made for merchandising and gifting by Greenpeace in support of our campaigns have minimal environmental impact and are procured in line with the organisation's core values.<sup>2</sup> It aims to achieve an ambitious level of transparency and management (progressive elimination) of hazardous chemicals.

In line with our need to be agile and responsive to various opportunities to enable people and movements to show their identification with and support for Greenpeace, this revised version of the Standard focuses the scope of the policy on large, visible and continuous merchandising and gifting operations, applying as flexible guidelines for all other activities. This selective approach aims to balance the needs of managing our credibility (assuming the highest risks come from the highly visible, continuously available merchandising and gifting operations) - not putting our brand on toxic and socially damaging products and making money out of them - with the eco-pragmatism of not requiring the same ambitious standards for our tactical operational ground and allies work (same approach as with our ships and banners - still using fossil fuels, plastics etc), where this is not possible.

## Standard

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

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

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

It is foreseen that either the Greenpeace NROs (National/regional organisations) and/or the Greenpeace International Textile Procurement Working Group may contact prospective suppliers with the intention of developing a list of suppliers that meet the standard. Greenpeace NROs should ensure close coordination with the Textile Procurement Working Group.

## 1. Applicability or Scope

This standard applies to the procurement by Greenpeace of any Textile Products made for sale to the public as merchandise, or for gifting - more specifically larger volume, highly visible and continuous merchandising and gifting operations (such as those via webshops or part of regular, planned fundraising events or activities). Textile products which do not fall into this category, are:

- one off gifts or sales, occasional in nature eg. special orders for specific responsive needs or special editions targeting a strategic campaign need; **or**
- those for use by Greenpeace internally, by volunteers, activists, crew or staff within the organization including onboard Greenpeace ships; **or**
- accessories to the main fabric of the product, either within the product (such as thread) or attached to it, such as zips, buttons; **or**
- made from secondary (ie re-used or recycled) raw materials; **or**
- micro or artisanal suppliers of blank textile products and micro or artisanal local printers and one off batches of non-standard products.

Please see separate [Guidelines no 1](#) for examples and relevant best practice recommendations.

Only Natural Fibre based Textile Products are allowed. Textile Products made of synthetic fibres are not allowed for gifting or for sale due to their environmental impacts. The inclusion of synthetic fibres (via labels, thread, elastane etc) within a Textile Product should only be permitted when it is technically unavoidable and should be kept to the minimum possible.

## 2. Key Minimum Requirements and Procedures

### Assessment of need

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

purchasing any Textile Products, the relevant Budget Holder must consider why a purchase of Textile Products is deemed necessary or of sufficient added value.

## Environmental criteria

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

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

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

For specific categories of printers which are a separate commercial entity/group from the manufacturing facility also refer to section 3.1.

### **2.1. Transparency of the manufacturing supply chain**

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

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

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

### **2.2. Verification of Wet Process supplier Facilities**

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

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

2.2.3 Procedural requirements: before confirmation of the relevant product order (i.e. before entering into a contract), the potential Contracted Supplier will provide the assessments for all individual Wet Process supplier Facilities to the Budget Holder and either publicly disclose them and/or agree to their publication.

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

The following requirements need to be met for the product order to be placed:

#### **2.3.1 Raw materials certification**

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

- 100% organic cotton or other Natural Fibre,<sup>3</sup> to be certified on the basis of recognized international or national organic standards.<sup>4</sup> This is fulfilled by using Global Organic Textile Standard (GOTS) (label grade Organic) or bioRe® Sustainable Cotton, or Equivalent standards.
- fairly traded raw materials, i.e. respecting social, economic and environmental standards for both companies and the farmers and workers growing crops, to be certified at the raw material supplier level, using preferably the Fairtrade standard (labelled 'Fairtrade cotton'), GOTS or bioRe® Sustainable Cotton, or Equivalent programmes.<sup>5</sup>

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

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<sup>3</sup> See section 3 below (Exceptions) for more details on non cotton fibres.

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

<sup>5</sup> Equivalent programmes or standards to GOTS organic Natural Fibres or programmes for fairtrade raw materials should be assessed on a case by case basis following advice from the Greenpeace International Global Textile Procurement Working Group.

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

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

2.3.5. Procedural requirements: where the Contracted Supplier is a different company to the recipient of the textile product certification, the product testing report shall be made available to the Contracted Supplier, and shared with the Budget Holder.

## **2.4 Procedural requirements for final delivery**

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

- i. Organic raw materials (both supplier and product lot certificates, eg. a GOTS Transaction Certificate) and fair trade certifications; and
- ii. a Letter of Overall Compliance delivered by OEKO-TEX® as specified in **Annex 3**, confirming an overall conclusion of pass, i.e. that all the Greenpeace Requirements (in respect of both the Wet Process supplier Facilities and the Textile Products) as referred to in paragraph 2.2.1 and 2.3.2 are met.

## **2.5. Other requirements and considerations**

Contracted Suppliers shall be required:

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

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

- transparency on social issues and human and labour rights;<sup>7</sup> and
- those issues resulting from Greenpeace campaign objectives, such as the use of recycled materials, use of a Reusable Packaging System (including the packaging of the individual Textile Products), renewable energy and minimisation of transport, energy, water use and waste, etc. (see [Guidelines no 1](#)).

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

<sup>7</sup> Some of the most recognised Social standards in the supply chain are for example [GOTS \(Version 6 Section 3\)](#), [FairWear Foundation](#), [Ethical Trade Initiative](#) and [Social Accountability International / SAI - SA 8000](#). In 2016 Fairtrade also set up the "[Fairtrade Textile Production programme / Standard](#)".

## 2.6. Public transparency

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

- i. the Supply Chain Description, (as referred to in section 2.1.1.above);
- ii. the assessments for all individual Wet Process supplier Facilities (as referred to in section 2.2.3 above), i.e. full STeP or DETOX TO ZERO by OEKO-TEX® report and letter of compliance (for each audit and intermediate audits/spot checks) and the corresponding independent laboratory testing report for Facility wastewater discharges, with detection levels, methodologies and location and timing of samples;
- iii. the product testing report from the final Textile Product (as referred to in section 2.3.4 above), i.e. full laboratory testing reports for product with detection levels and methodologies;
- iv. the Letter of Overall Compliance; and
- v. all other certifications as detailed above in sections 2.4 and 2.5;

will be publicly available at a single location on the Contracted Supplier's website or via a third party transparency system. For exemptions for certain categories of Contracted Suppliers refer to 3.2 below.

### Certification and auditing providers

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

### Supplier management

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

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<sup>8</sup> A decision on equivalence should be taken upon advice from the Greenpeace International Global Textile Procurement Working Group

### 3. Exemptions

#### 3.1 Dedicated printers

3.1.1 Printers that are a separate commercial entity/group: exemptions can be made for the wastewater requirements as detailed in Sections 2.2 where the screen printer is a separate commercial entity/group from the manufacturing facility but is using blank textile products from a supplier compliant with this Standard and the facility is a:

- Dedicated micro and small screen printing facility with:
  - insufficient annual turnover to support costs of full wastewater certification and auditing, or insufficient wastewater is generated to enable practical testing of wastewater effluent, (as advised by the Greenpeace Textile Procurement Working Group on a case by case basis taking into account the local costs of certification relative to the margins for the facility and the volume of the orders in question); or
- Dedicated screen printer facilities in locations where sampling and/or analysis arrangements for wastewaters are not available (for example, no DTZ approved laboratory is available locally, or shipping of wastewater samples to an approved laboratory is not possible).

3.1.2 Exempted micro and small screen printers as described above are exempted from the wastewater requirements as detailed in Sections 2.3. These facilities are required to:

- a) Provide a supply chain transparency form (as per 2.1) referring to the information already made available by the compliant blank product supplier.
- b) Provide documentation showing that they use only certified printing inputs (eg inks) with sufficient scope of hazardous chemical restrictions:
  - i) ECO PASSPORT by OEKO-TEX®, GOTS and Bluesign or equivalent, and
  - ii) meeting Level 1 or above (requiring 3rd party checking) conformance by [ZDHC Chemicals Input](#) programme
- c) Confirm in writing that the final screen washing and other wastewater are not discharged into the natural environment without separating the ink solids and disposing of these solids safely and provide the conventional wastewater testing reports showing compliance with local regulations as required by local public authorities.
- d) Textile Product certification as in 2.3.2 - 2.3.4 is still required. In the case of unpredictable or uncertain order volumes from Greenpeace and other clients to justify enough of the costs of full product certification and auditing, a phased approach to product compliance may be agreed upon



advice of the Greenpeace International Global Textile Procurement Working Group.

### **3.2 Public transparency for certain categories of Contracted Suppliers**

Where the Contracted Supplier has low leverage on the manufacturing supply chain/supply of blank garments, the Contracted Supplier will disclose the supply chain description form and compliance of the manufacturing supply chain (as per 2.6 ) to OEKO-TEX, for third party verification, confirmed in their Letter of Overall Compliance to the Contracted Supplier. As a minimum, the Overall Letter of Compliance and the final product testing report and certificate (as per 2.6.iii) should be made publicly available at a single location on Contracted Supplier's website..

### **3.3 Exceptional circumstances**

Where manufacturing, auditing and certification are suspended for external reasons such as pandemics, natural disasters, or macro economic circumstances, the validity of any third party verification or certification can be temporarily extended or exempted upon advice of the Greenpeace International Global Textile Procurement Working Group.

Otherwise, there are no exemptions envisaged to this policy.

## **4. Responsibilities and Monitoring**

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

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

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

- a) Carry out an annual revision in line with revisions of third party certification and report this to the Greenpeace International task giver, the Chief Operating Officer
- b) oversee the monitoring of standards, including on a regular basis review the recognised equivalence of any other certifications that are relevant and report observations to [the task giver];
- c) collect and organise all relevant documents of compliance necessary for a review ; and

- d) provide assistance and information to the Budget Holder responsible for implementing this standard.

## 5. Validity and Revision status

This standard will be reviewed by GPI with inputs from the global NRO Community of Practice and brought to EDs for discussion by mid 2022.

**For more information, please contact the Greenpeace International Global Textile Procurement Contact: [textiles-procurement.int@greenpeace.org](mailto:textiles-procurement.int@greenpeace.org)**

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## Annex 1: Definitions

Budget Holder	The person responsible within GPI or an NRO for managing the Textile Products procurement budget and for internal authorisation of any expenditure from that budget.
Contracted Supplier	The supplier, or its delegated party or trading partner, which delivers the final product to a Greenpeace organisation.
Detox	Refers to Greenpeace's Detox campaign, see Introduction.
DETOX TO ZERO by OEKO-TEX®	DETOX TO ZERO by OEKO-TEX® is a tool for manufacturers in the textile chain to assess, and document, the status of their chemicals management systems and the quality of their wastewater and sludge. The findings of the DETOX TO ZERO by OEKO-TEX® assessment are reported in a Status Report or within a SteP by OEKO-TEX® audit report, whichever is relevant.
Equivalent	Any audit or certification tool, or customized agreements set up with third parties, are assessed to be "at least equivalent" by meeting the same ambition and requirements as those laid down in this policy (on a case by case basis following advice from the Greenpeace International Global Textile Procurement Working Group).
Facility/Facilities	Any individual mill/factory in the manufacturing supply chain of the Textile Products.
GPI	Greenpeace International (official name: Stichting Greenpeace Council); a foundation incorporated under the laws of the Netherlands, a coordinating and supporting organisation for the independent national and regional Greenpeace organisations (NROs) across the world
Greenpeace	The independent global environmental campaigning network that consists of 26 independent national/regional Greenpeace organisations (NROs) across the world, plus Greenpeace International as a coordinating and supporting organisation.
Greenpeace Requirements	The requirements of Greenpeace regarding the supply chain Facilities and the Textile Products, to be assessed and reported by OEKO-TEX®. These requirements are set out in an Agreement between GREENPEACE and OEKO-TEX® on customised CHEMICAL AUDITING AND PRODUCT TESTING REQUIREMENTS FOR

	PROCUREMENT OF Greenpeace TEXTILE PRODUCTS – AUDITING BY OEKO-TEX®, attached to this policy in <b>Annex 3</b> .
Greenpeace Textile Procurement Working Group	Textile procurement policy implementation support group (including helpdesk), and advisory body tasked by the Greenpeace International Chief Operating Officer to provide - technical (including textiles and merchandising expertise), scientific, project management and campaign legacy knowledge to stakeholders within global Greenpeace.
Hazardous Chemicals	For the implementation of this policy, all chemicals as referred to in the Manufacturing Restricted Substances List (MRSL) as covered by the DETOX TO ZERO by OEKO-TEX® GUIDELINE MRSL, an example of Detox best practice. <sup>9</sup>
Letter of Overall Compliance	A letter of overall compliance issued by OEKO-TEX® which will summarise the combined PASS/FAIL status or compliance for all the relevant Wet Process supplier Facility/ies (in the case that processes are undertaken at several separate locations) and the final Textile Products, indicating a PASS on both the testing of raw/untreated Waste Water of the supplier Facilities and of the final Textile Products. A FAIL on any of the Greenpeace Requirements single criteria is an overall FAIL.
Natural Fibres	Includes: <ul style="list-style-type: none"> <li>• vegetable, or cellulose-based fibres such as cotton, flax/linen, hemp, and jute;</li> <li>• animal, or protein-based, fibres such as wool, mohair, and silk.</li> </ul> <p>It excludes fibres from a natural source which are subjected to polymerisation eg. viscose from bamboo or wood.</p>
NRO	Independent National/Regional Greenpeace organisations
Reusable Packaging System	Packaging that is constructed of durable materials and is designed to achieve multiple uses in its existing form without any physical or chemical modification and is refilled or used for the same purpose for which it was conceived. To qualify as reusable, there needs to be a reuse system in place that ensures it is reused in practice where the item is placed on the market. Such a system for reuse should be able to prove a significant actual reuse rate.
Subcontractor	Companies/suppliers of the Contracted Supplier, further down the Supply Chain (see Supply Chain Description).

<sup>9</sup> The DETOX TO ZERO by OEKO-TEX® Guideline MRSL is publicly available at:  
[https://www.oeko-tex.com/en/business/certifications\\_and\\_services/detox\\_to\\_zero/detox\\_to\\_zero\\_start.xhtml](https://www.oeko-tex.com/en/business/certifications_and_services/detox_to_zero/detox_to_zero_start.xhtml)

Supply Chain Description	The details of the overall chain of operations used for the manufacturing of each Textile Product to be ordered by Greenpeace. This includes all steps from the supply of the raw materials to the assembly of the final product, for each company and Facility supplying the Textile Product. It includes details of location, contacts, operations (including Wet Processes),(see Annex 2).
Textile Products	Textile Products refers to all textile products that can be sold as merchandise, for gifting, or that are being used by volunteers, activists, crew or staff within the organisation or on board Greenpeace ships.
Wet Processing/Wet Processes	The textile fabric manufacturing processes that are carried out using water, which usually covers pre-treatment, washing, dyeing, printing and finishing. Wet processes use the most chemicals and generate wastewater.

## Annex 2: Supply Chain Description Form

The supply chain description form, including instructions, for candidate suppliers is available [here](#).

## Annex 3: Agreement between Greenpeace and OEKO-TEX®

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

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

#### **Requirements:**

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

The product should be certified according to STANDARD 100 by OEKO-TEX® Annex 6 (I Baby).

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

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

For the facility analysis a DETOX TO ZERO by OEKO-TEX® status report<sup>10</sup> will be generated as per normal procedure.<sup>11</sup> Additionally the requirements for wastewater (and sludge where applicable) and MRSL compliance need to be met. Independent of whether the facility has a wastewater treatment plant or not, the relevant sample for assessing exceedances of Reporting Limits is always to be taken before treatment (ie. the 'raw', or untreated wastewater).

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

The transitional exceedances of DTZ Reporting Limits for factory raw/untreated wastewater of the "original 11 priority hazardous chemical groups"<sup>12</sup> and the so-called "beyond 11 groups" (see hazardous chemical groups highlighted) are detailed in the following table.

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<sup>10</sup> Note: this could also be a STeP by OEKO-TEX® audit report where relevant, applicable throughout this document whenever the OEKO-TEX status report is mentioned.

<sup>11</sup> Guideline DETOX TO ZERO by OEKO-TEX®

[https://www.oeko-tex.com/fileadmin/user\\_upload/Marketing\\_Materialien/DETOX\\_TO\\_ZERO/Guideline/DETOX\\_TO\\_ZERO\\_by\\_OEKO-TEX\\_R\\_-\\_Guideline\\_01.2021\\_EN\\_encrypted.pdf](https://www.oeko-tex.com/fileadmin/user_upload/Marketing_Materialien/DETOX_TO_ZERO/Guideline/DETOX_TO_ZERO_by_OEKO-TEX_R_-_Guideline_01.2021_EN_encrypted.pdf)

<sup>12</sup> Greenpeace Germany (2018), [Destination Zero](#), see Box 1 page 12.

TABLE 1: Greenpeace Requirements for factory raw/untreated wastewater discharge based on DETOX TO ZERO by OEKO-TEX®						
Chemical group category	Chemical group or chemical	PASS = Non-Detect (ND) / OR factor above DTZ Reporting Limits (RLs)*	Chemical specifics	DTZ Report- ing Limits (µg/L)	Green -peace require- ment (exceed- ance limit) (µg/L)	Other require- ments
<p>* No exceedance of the DTZ Reporting Limits (RLs) unless otherwise specified. Where specified, a factor refers to factor above DTZ RLs</p> <p>** Where reporting limits for specific chemicals differ, refer to the OEKO-TEX® DTZ MRSL (see footnote 2)</p> <p>*** See best practice conditional exemptions below, for facilities using polyester</p>						
Heavy metals - priority	Cadmium (Cd), lead (Pb)	= less than a factor of 10	Cd	0.1	1	
			Pb	1	10	
	Mercury (Hg), chromium VI (CrVI)	= ND	Hg	0.05	0.05	
			CrVI	1	1	
Heavy metals - other	Total chromium (Cr), arsenic (As), copper (Cu), nickel (Ni), antimony (Sb), cobalt (Co), zinc (Zn), manganese (Mn), silver (Ag)	= align with the ZDHC “aspirational” levels, with the addition of Mn limit of 250 µg/l <sup>13</sup>	Total Cr	1	50	
			As	1	5	
			Cu	1	250	
			Ni	1	50	
			Sb	1	10***	
			Co	1	10	
			Zn	5	500	
			Mn	1	250	
			Ag	1	5	
			Requirements on Organics ((10 priority groups below), apply up to 31st December 2020. After that date, requirements on these Organics will be Non Detect (ND) according to the RLs in latest OEKO-TEX DTZ MRSL, unless otherwise notified			

<sup>13</sup> ZDHC guidelines do not include manganese, this is the level recommended by Greenpeace following a review of wastewater data published by several Detox brands.

<b>Organics</b>  10 priority groups	Brominated/ Chlorinated Flame Retardants (B/CFRs), Perfluorinated compounds (PFCs), Arylamines released from azo dyes (azo dyes) Organotins (OTs), Chlorophenols (CPs), Short/Medium chain chlorinated paraffins (S/MCCPs)	<b>= ND</b>	<b>B/CFRs (each/sum)</b>	<b>1/5**</b>	<b>1/5**</b>	
			<b>PFCs (other than PFC categories below) (each)</b>	<b>0.01</b>	<b>0.01</b>	
			<b>PFCs (sulphonamides/sulphonamide alcohols)</b>	<b>0.1</b>	<b>0.1</b>	
			<b>PFCs (FTOHs/FTAs) (each)</b>	<b>1</b>	<b>1</b>	
			<b>Azo dyes</b>	<b>0.1</b>	<b>0.1</b>	
			<b>OTs (each)</b>	<b>0.01</b>	<b>0.01</b>	
			<b>CPs (each)</b>	<b>0.5</b>	<b>0.5</b>	
			<b>S/MCCPs</b>	<b>5</b>	<b>5</b>	
	Alkylphenols (APs) and alkylphenol ethoxylates (APEs), Chlorinated solvents (C solvents)	<b>= less than a factor of 5</b> per individual chemical	<b>APs</b>	<b>1</b>	<b>5</b>	<b>Any detect of more than 3 groups is a FAIL</b> (APs/APEs counts as a single group)  <b>OR</b> <b>Any detect of more than 5 individual chemicals in any group is a FAIL</b>
			<b>NPs</b>	<b>1</b>	<b>5</b>	
			<b>OPs</b>	<b>1</b>	<b>5</b>	
			<b>APEs</b>	<b>1</b>	<b>5</b>	
			<b>NPEs</b>	<b>1</b>	<b>5</b>	
			<b>OPEs</b>	<b>1</b>	<b>5</b>	
			<b>Sum of all APs +APEs</b>	<b>-</b>	<b>10</b>	
			<b>Phthalates</b>	<b>2</b>	<b>10</b>	
			<b>C solvents (each)</b>	<b>1</b>	<b>5</b>	
	Chlorobenzenes (including chlorotoluenes) (CB/Ts)	<b>= less than a factor of 2</b> per individual chemical	<b>CB/Ts</b>	<b>0.1</b>	<b>0.2</b>	



<b>Organics</b>  Beyond 10 organic priority groups	Other flame retardants (other FRs) except:	= less than a <b>Factor of 50</b> per individual chemical.	Other FRs	1	50	Any detect of more than 5 individual chemicals in any group is a FAIL
	Chlorinated phosphate FRs	ND		1	1	
	Carcinogenic dyes (CMR dyes); Allergenic disperse dyes (AD dyes),	= less than a <b>Factor of 10</b> per individual chemical.	CMR dyes AD dyes	1 1	10 10	
	Other VOCs: Benzene & certain alkyl derivatives (toluene, xylene (o,p,m), styrene, ethylbenzene)	= less than <b>factor of 5</b> per individual chemical	Benzene & derivatives	1	5	
	Other VOCs: Dimethylformamide (NN-DMF)	= less than <b>factor of 2</b>	NN-DMF	10	20	Any detect of more than 5 individual chemicals in any group is a FAIL
	Other VOCs: Bis(2-methoxyethyl) ether	= less than a <b>Factor of 100</b> per individual chemical.		1	100	
	Other VOCs: Methyl-ethyl-ketone, Cyclohexanone, 2-Ethoxyethyl acetate, Acetophenone, 2-Phenyl-2-propanol, 1-Methyl-2-pyrrolidone (NMP), N,N-Dimethylacetamide (DMAc)	= less than a <b>Factor of 10</b> per individual chemical.		10	100	
	Other VOCs: Glycol ethers	= less than a <b>Factor of 2</b> per		50	100	

		individual chemical.				
	Polycyclic aromatic hydrocarbons (PAHs)	ND - per individual chemical	PAHs	1	1	
	Cresols, o,p,m	= less than a Factor of 5 per individual chemical.	Cresols	1	5	

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

#### **Best practice conditional exemptions for specific cases**

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

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

For antimony, where found in wastewater from a facility that is also processing polyester, the permitted exceedance is up to 50 ug/l. The facility’s “corrective action plan” must include at least:

- a) verifying the levels of extractable antimony in polyester supplies, based on Standard 100 Appendix 6 (either self testing, as per requirements in section 2, or requiring equivalent information from the raw material supplier), and
- b) a commitment and a schedule to transition to antimony-free polyester in the next 1-3 years

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

#### **Testing requirements for Organics & Heavy Metals in sludge**

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

comparable facilities data

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

### 1.2. Chemical Inventory

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

### 1.3. Implementation progress over time

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

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

### 1.4 Exemptions for facility analysis using DETOX TO ZERO for small printers

Exemptions for facility analysis for small printers are permitted according to the steps laid down in [Guidelines for using Standard 100 by OEKO-TEX® as an alternative to Detox To Zero Audit](#).

## 2. Product testing within Standard 100 by OEKO-TEX® Annex 6 - ‘baby’

For product testing, OEKO-TEX® to test and audit products according to Standard 100 Annex 6 (I Baby)<sup>14</sup> as per normal procedure. Any exceedance would mean a FAIL. A statement to verify compliance with the Greenpeace requirements will be included in the letter of overall compliance (see 3).

Wherever possible, it is **recommended** components and accessories should also pass the OEKO-TEX Standard 100 final garment certification (either blank or printed) according to Annex 6 (I baby). This means that the accessories or components should have their own Standard 100 Annex 6 certification

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<sup>14</sup> STANDARD 100 by OEKO-TEX®, see Limit Values and Individual Substances According to Annexes 6 & 7  
[https://www.oeko-tex.com/importedmedia/downloadfiles/STANDARD\\_100\\_by\\_OEKO-TEX\\_R\\_-\\_Standard\\_en.pdf](https://www.oeko-tex.com/importedmedia/downloadfiles/STANDARD_100_by_OEKO-TEX_R_-_Standard_en.pdf)

or be included in the final whole garment Standard100 certification. For those components and accessories assessment of supply chain facilities (eg. DETOX TO ZERO audit and transparency requirements, 2.2 & 2.1) would not be needed.

Where OEKO-TEX Standard 100 Annex 6 for components or accessories **is not currently available**, **OEKO-TEX** Standard 100 Annex 4 certification is acceptable. **The supplier will be encouraged to upgrade** to OEKO-TEX Standard 100 Annex 6 on renewal of the OEKO-TEX Standard 100 certification, at least for specified components/accessories.

Certification with GOTS or other organic certification is also recommended for components or accessories made with natural fibres.

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

- A single letter of overall compliance by OEKO-TEX® to the client (Greenpeace contracted supplier) would combine the wastewater/sludge findings, the MRSL compliance for all the relevant facilities (in the case that processes are undertaken at several separate locations) and the product compliance, according to the requirements above in points 1 and 2, and give an overall conclusion of PASS/FAIL.
- OEKO-TEX® will verify wastewater/sludge testing data according to the requirements of its DTZ by OEKO-TEX® Guideline (annual check including wastewater data). In the case where there is more than one wet process supply chain facility, the names and addresses will be communicated to OEKO-TEX by the contracted supplier (see Annex 2, Supply Chain Description). The PASS/FAIL conclusion of the DTZ analysis in relation to Greenpeace's requirements needs to be summarised in the OEKO-TEX® DTZ Status Report/or in a letter of compliance, for each client.
- To support the requirements in Greenpeace's Textile Procurement Standard on transparency OEKO-TEX® would work towards future full disclosure via OEKO-TEX® website (e.g. via OEKO-TEX® Buying Guide) of:
  - 1 - full DTZ Status Report (for each audit and intermediate audits/spot checks)
  - 2 - full laboratory testing reports for discharges and product with detection levels and methodologies and location and timing of samples
  - 3 - any letters of compliance
- DTZ analysis, Standard 100 product test and assessment of Greenpeace requirements are carried out annually. The letter of compliance will be valid for 12 months for all Greenpeace procurement from the date of the letter.