

Recycled Claim Standard 2.0 and Global Recycled Standard 4.0 Feedback Summary

Prepared September 27, 2018

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

Draft Consultation Period:

March 22 - April 28, 2017

Note: This document has been prepared one year following the revision of the Standards to provide evidence for our ISEAL Membership and was not available at the time the standards were released.

1. Participation

In total, 19 stakeholders participated in the Public Stakeholder Consultation. These comments came mostly from Brands and Retailers, Certification Bodies, and Supply Chain users of the Standard. Additional comments were also collected from the academic community and a commercial tracing provider.

Total number of stakeholders: 19

- Brands/Retailers: 5
- Supply Chain: 2
- Raw Material Producers: 3
- Industry Groups: 1
- Certification and Accreditation Services: 4
- Other: 4

Stakeholders from the following regions participated:

- Central Asia: 2
- East Asia: 1
- Europe: 7
- North America: 7
- Global: 2

The feedback from the Consultation was predominantly from the Brand/Retailer sector from Europe or North America. The numbers of regions represented is not entirely able to be divided along Regional representation, as many of the companies operate at a global scale. There were few comments from Asia, which is a key region in the manufacture and use of recycled content. The Standard is applied in many non-textile contexts, and we did not have any Stakeholder comments from companies with non-textile commercial interests.

2. Analysis of Comments Received During the Public Stakeholder Consultation

The comments received during the Public Stakeholder Consultation (we have only included those related to the proposed changes) were related to how recycled inputs are defined and accepted, terms of recycling, and environmental and social criteria.

Reclaimed Material Supplier Checks

In the revision, a change was proposed to require a Reclaimed Material Supplier Agreement form to create a stronger requirement for Reclaimed Material Suppliers to allow Certification Bodies to do direct checks.

Clarification of recycling terms

Assigning the definition of “recycled” has proven to be challenging due to the wide range of feedstocks, recycling methods, and uses of the material. There was particular confusion around the “pre-consumer” categorization. Most of the comments of this type were accepted as examples in the Implementation Manual of the standard. Some of the comments provided specific examples that should be included or questions raised by a particular phrase.

Due to this feedback and confusion, we also created more explicit guidance for how to assess pre-consumer material that was collected and used within the same facility.

We received Feedback that at least 1/3 of all of these Suppliers should be directly checked by a Certification Body to ensure that 100% of Suppliers are checked within three years. The Members of the IWG liked the idea, but felt that more work was needed to lower the barriers Certification Bodies were facing in even visiting the 10% of additional checks required. We will revisit this suggestion in future revisions.

“Better” Recycling

This was a general topic of interest from many parties throughout the revision. The suggestion was to add more guidance or incentive to forms of recycling that provide more

environmental benefits than virgin material. This would result in creating incentive for only recycling that actually improves performance.

The Members of the IWG agreed that this was outside the current scope of the standard, but posed a likely helpful prospect for future versions of the standard. Textile Exchange has committed to researching how the Standards could be revised to drive environmental benefit.

Social Criteria

There was a suggestion to require sites to create an action plan in the case that young workers were found to be employed. This plan would protect them from potential economic impacts of getting immediately fired.

The Social Requirements included within the Standard reference other existing Social Responsibility criteria used in manufacturing. By including criteria that align with other standards, and by recognizing existing audits in the standard, the Standard can provide a strong assurance of performance in key areas, without increasing the audit pressure. This suggestion was not accepted.

A suggestion to add hearing protection as part of Personal Protection Equipment was accepted.

Environmental Criteria

There was a suggestion to make the results of the environmental audits, including parameter measurements, publicly available. The purpose of this would be to increase the accountability of clients, and make the claims of the standard more transparent. There was general opposition to this suggestion, as it would fundamentally change the structure of all Textile Exchange standards, which are pass/fail in nature. There could be a role for disclosure in the future, but it was felt that this could take away the focus from the recycled content verification at this time.