



**Textile
Exchange**

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**MATERIALS MATTER
STANDARD PILOT V1.0**



SUMMARY OF FEEDBACK ON THE DRAFT STANDARD

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Introduction

Textile Exchange is a global non-profit helping to drive beneficial outcomes for climate and nature across the fashion, textile, and apparel industry, right from the start of the supply system.

Our goal is to help the industry achieve a 45% reduction in the greenhouse gas emissions that come from producing fibers and raw materials by 2030 (from a 2019 baseline). To reach it, we maintain a holistic and interconnected focus, accelerating the adoption of practices that improve soil health, water, and biodiversity, while respecting human livelihoods and animal welfare.

Over the last 20 years, our internationally recognized standards covering the production of various fibers and raw materials have helped build integrity in the industry. As a member of ISEAL, we comply with three credibility Codes of Good Practice which underpin our policies and procedures for organizational functions such as standard-setting, assurance, monitoring, evaluation, and learning. These practices ensure that our standards provide value, rigor, accessibility, and transparency.

All our standards are supported by an independent, third-party assurance model that supports organizations in consistently demonstrating and maintaining conformity while handling and trading their certified products, through an independently verifiable and impartial process.

This document provides a summary of the feedback received during the two public consultation periods on the draft Materials Matter Standard versions 1.1 and 2.1 in 2023, and how the feedback was addressed in developing the Materials Matter pilot standard V1.0, released in May 2024. During the development process, the Materials Matter Standard was referred to as the draft unified standard versions 1.1 and 2.1.

We reviewed over 2,300 comments during this feedback process. This document reflects all major summarized feedback and Textile Exchange's responses, grouped by theme, with an emphasis on clarity and brevity. If you feel that feedback you submitted was omitted or misrepresented in any way, we encourage you to contact us through our standards feedback form so that we can provide you with additional information.

About the Materials Matter Standard

The Materials Matter Standard (formerly known as “the unified standard”) is a voluntary sustainability standard for the production and initial processing of raw materials used in the fashion, textile, and apparel industry.

The Standard aims to incentivize a system where the materials in our clothing and textiles support the climate, respect human rights and animal welfare, and drive beneficial outcomes for soil health, water, and biodiversity. It aligns the industry on a shared trajectory toward this vision by establishing best practices for different materials in various settings, from farms to recycling facilities.

By focusing specifically on the start of the supply chain, the Materials Matter Standard provides a global certification model that is connected to the unique contexts of producers

and processors, as well as their local communities and landscapes. A combination of practice-based criteria and outcome-based indicators helps participating organizations get acknowledged for meeting core requirements and builds their capacity to measure results. Simultaneously, it provides brands and retailers that choose certified materials with a way to speak confidently to their customers about these materials.

In the long term, the Materials Matter Standard offers a foundation for producers and processors to understand how their activities impact the people and ecosystems around them, track their progress based on different practices, and learn where to improve over time to drive beneficial outcomes on the ground. Beyond getting certified, optional leadership criteria invite participating organizations to raise the bar in areas like regeneration, renewable energy, and textile-to-textile recycling.

Over time, the Materials Matter Standard will be improved and adapted using insights from the auditing process and outcome measurements. This will help ensure it brings meaningful benefits to those producing materials for the industry, as well as those directly impacted by the practices they use.

Please note that the Materials Matter Standard was known as “the unified standard” during its development. With the release of the Pilot V1.0, Textile Exchange is pleased to share its official name with stakeholders.

About the consultation process

Textile Exchange’s Standards Team is leading the revision process for the Materials Matter Standard in close collaboration with the International Working Group (IWG), guided by input from many subject matter experts, both internal and external. Details on how decisions are made can be found in section A4 of our [Standard Setting Procedures](#) (ASR-102-V3.0-2021.11.16).

The development of a unified standard system that brings together our material-specific standards with the aim of incorporating Climate+ practices and outcomes has been underway since we formally announced our Climate+ strategy in early 2022. Development of the standard content began in 2022 and resulted in two rounds of public consultation:

1. The first draft was released for public comment from May to July 2023.
2. The second draft was released for public comment from October to November 2023.

Providing two drafts for public comment allowed the complex content to be developed in stages while bringing stakeholders along in the development process. It also provided a way for our team to collect input on and address some of the more challenging topics early in the development and drafting process.

The second draft contained updated content based on feedback from the first draft, internal decisions related to our theory of change, and a focus on priority materials.

To raise awareness of the public consultations on the first and second draft standards, we planned various outreach activities. We utilized our roundtables through virtual and in-person events to provide updates and overview information. We also held public launch webinars, provided notifications on the Textile Exchange Hub and via newsletters, and offered

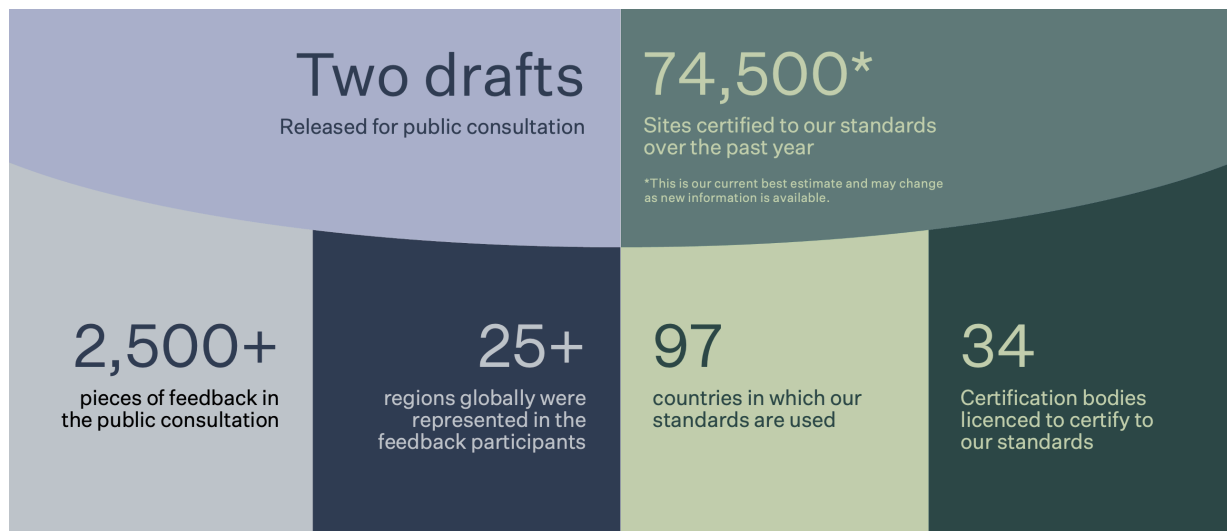
supplementary documents with more information. Feedback was shared via online and offline comment tracking tools.

More detailed discussion papers were also shared to selected stakeholders based on their subject matter expertise. These discussion papers covered the following topics: Recognition, Fiber crops, Approach to Chemical Requirements, Approach to Human Rights and Livelihoods, and Animal Fiber-Based Land Management/Predator Management.

Stakeholder participation

We released two drafts for public consultation and gathered feedback on the first draft of the Materials Matter Standard version 1.1 from May to July 2023, and the second draft of the Materials Matter Standard version 2.1 from October to November 2023, in addition to targeted outreach activities throughout the year. During this time, we received over 2,500 comments. More than 25 regions globally were represented in the feedback, with participants sharing their input from various stages of the supply chain.

Enabling credible claims through material sustainability standards



Summary of comments received by theme

General feedback

Many stakeholders expressed appreciation of the work being done to harmonize our standards system. A few concerns were raised early in the development process, such as uncertainty regarding:

1. What the scope of the Materials Matter Standard is when it comes to the following:
 - a. Which materials are included in the harmonization.
 - b. How materials will/may be added to the standard later (e.g., leather, linen, hemp, down, latex, new technologies where a novel fiber doesn't have a name yet, etc.).
 - c. What our approach to manmade cellulosic fibers (MMCF) will be.
 - d. The future of the Organic Content Standard (OCS).
 - e. Expanded social criteria in the new standard as compared to what is currently in the Global Recycled Standard (GRS) and the Responsible Animal Fiber (RAF) framework.
 - f. Impact on certification cost and length of audits,

TEXTILE EXCHANGE RESPONSE:

Regarding uncertainty about which materials are included in the harmonization, our thinking progressed throughout the development process. Yak and latex have been removed, and we have refined our definitions of biomaterials/biosynthetics. Our approach to cotton has also evolved. Yak, an animal material, was included in the first draft of the Materials Matter Standard but was removed in the second draft. Although we conducted substantial research on relevant welfare and land use topics for yak, we decided to focus on priority materials going forward, largely due to the significant amount of feedback we received regarding yak. Narrowing our focus to priority materials will strengthen our position for implementation planning as we roll out the new standard system. Latex, a forest-derived raw material, was also removed from the scope of the standard between the first and the second drafts. The Standard's extension into first processing would require significant research and development of chemical and other latex/rubber manufacturing impact requirements. Similar to yak, this change in scope was based on prioritizing key materials for the current standard development and implementation planning.

In the first draft, we included farm-level land use criteria for cotton, which were removed in the second draft with the intention of moving forward with a recognition concept for preferred cotton in the Materials Matter Standard system.

This will necessitate retaining the OCS as a standalone standard under the Materials Matter brand, with a key focus on strengthening volume data visibility. Future development may also include a framework to recognize organic producers and producer groups that address areas beyond the scope of traditional organic certification systems such as human rights and livelihoods, regenerative practices, and impact data collection. The materials included in the scope of the pilot version 1.0 of the Materials Matter Standard are as follows:

- a. Animal fibers and materials: Sheep wool, Mohair, Alpaca, Down, and Skins
- b. Recycled materials: Synthetics, Natural materials, Recycled MMCF

Some of the materials proposed for inclusion within the scope of the standard will be added through a framework for recognition partnerships with organizations that own sustainability systems. This collaboration aims to avoid duplication of standards systems. Partnerships for full recognition mean that we would accept related certified raw material inputs into its standard system rather than requiring direct Textile Exchange raw material certification. The proposed materials that may be added over time are:

- a. Animal fibers and materials: Cashmere
- b. Fiber crops: Cotton
- c. Recycled: MMCF, Biosynthetics

We received mixed feedback regarding our expanded focus on Human Rights and Livelihoods (HR&L) across all material-specific scopes. There are two important considerations when discussing this topic:

1. Some of our existing standards already include human rights and livelihoods criteria.
2. Existing international standards require basic human rights due diligence.

As a scheme owner, we must find a balance between meeting expectations and fulfilling our responsibility in a manageable and realistic way. We understand the concerns raised and are using them to determine what is feasible and in what timeframe. As we refine the Materials Matter Standard through the pilot campaign, we recognize that producers and facilities will need sufficient transition times to demonstrate conformance with the HR&L criteria. Throughout 2024, we have planned 19 pilots around the globe to assess how all our criteria perform on the ground. We anticipate gaining significant insights into the addition of human rights and livelihoods criteria through these pilots and will provide updates on our progress as we move towards developing the final Materials Matter Standard in 2025. These pilots will also provide valuable information on the complexity, duration, and cost of audits for the Materials Matter Standard, as well as on training certification body and educating certified organization about the Materials Matter Standard.

2. Moving away from monitoring all tiers of the supply chain for environmental and social criteria.

TEXTILE EXCHANGE RESPONSE:

The refined organizational strategy is focused on tier 4 and our standard(s) are redesigned to align with organizational purpose. As we transition from the pilot version in 2024 to the published final version in 2025, conversations about how to potentially apply supply chain modules for tiers 1 to 3 are ongoing.

3. How the Materials Matter Standard will align with current and forecasted EU legislation and policy.

TEXTILE EXCHANGE RESPONSE:

Materials Matter Standard alignment with EU policy developments is an ongoing workstream. In addition to working with a consultancy and bringing a policy specialist onboard to evaluate gaps and opportunities, we have active dialogue with experts from the EU-funded project CIRPASS and the digital product passport connectivity.

In the first two draft versions of the Materials Matter Standard, we tagged criteria with potential Monitoring, Evaluation and Learning (MEL) indicators. However, these indicators have since been removed from the pilot version released in June 2024. We received various questions indicating that stakeholders felt it was unclear whether MEL indicators were binding and how we monitor, evaluate and learn via the Materials Matter Standard system.

TEXTILE EXCHANGE RESPONSE:

We are currently developing an organizational MEL system to supplement the standard system as a whole. Our MEL system is planned to cover areas such as measuring progress on outcomes towards beneficial impacts, scale and reach of standards, adoption and uptake across different sectors and organization types, as well as the effectiveness of standards. As part of this process, the MEL activities for the standards system are being prioritized and a summary paper on Theory of Change and MEL is available on our website to provide more details on this development.

Throughout the development of the first two drafts, we received several questions on data collection requirements, mainly from the certification body (CB) community. The comments highlighted the following concerns:

1. The data entry of Textile Exchange's Geographic Information System (GIS) was reported to be challenging in agricultural environments due to the lack of technology and consistent internet access.

TEXTILE EXCHANGE RESPONSE:

In early 2023, we changed the way that the farm questionnaire was submitted. Instead of collecting various Excel spreadsheets, the questionnaire answers plus the polygon information is now submitted through the ArcGIS portal. We recognize that a stable and strong internet signal is not universally available around the globe. We are continuously evaluating whether these improvements are increasing the use of the questionnaire and are open to additional feedback on this matter [here](#).

2. There is a need for a clear process for CBs to validate the GIS data they receive.

TEXTILE EXCHANGE RESPONSE:

We are reviewing the current data collection process in consultation with CBs to prepare for new data collection planned to accompany the launch of the Materials Matter Standard. More details about the process of validating data as part of the annual audit cycle will be provided to CBs to ensure a consistent approach is implemented.

3. Larger CBs expressed concerns about having a separate Textile Exchange portal and how the Textile Exchange system would communicate with their own data management systems.

TEXTILE EXCHANGE RESPONSE:

We are open to exploring how data can be shared between Textile Exchange and CB systems. We are aware that for some CBs with a significant volume of data, efficiencies can be gained by automating communication between systems. However, there are costs associated with setting up and maintaining communication between systems, but we remain open to these approaches wherever feasible. For example, we already have an application programming interface (API) available for CBs to use for absorbing dTrackit data.

4. There was a request for Textile Exchange to provide a list of approved consultants to assist with the technical implementation of data collection requirements.

TEXTILE EXCHANGE RESPONSE:

We do not currently have plans to evaluate or approve consultants for technical assistance. Consultancy services are not part of the Textile Exchange Standards system at this time. However, we recommend that interested parties utilize The Hub, a platform that allows members of the Textile Exchange community to connect and discuss various topics, including consultancy services, through message boards.

During the first public consultation, we did not receive feedback from stakeholders focused on duck/goose down. Additionally, formal feedback was only received from one CB during the first draft public consultation.

TEXTILE EXCHANGE RESPONSE:

During the public consultation, we noted omissions in stakeholder group representation. We received limited feedback from small farmers, no feedback from stakeholders focused on duck/goose down, and only a few feedback from certification bodies. This outcome guided an approach to incorporate more targeted outreach as we worked towards the second draft. By the second consultation, we heard from more CBs through dedicated discussions to get reactions throughout the development process. Our 2023 conference in London provided multiple sessions focused on the standards development, seeking more participation from these stakeholders. Despite efforts, we continue to be short on feedback from stakeholders at the farm level in down supply chains.

Several concerns were raised around smallholder engagement during the public consultations. During the first public comment period, we received limited feedback from small farmers, leading to concerns that we had not adequately reached out to this stakeholder group. These concerns echoed fears that some stakeholders, particularly smallholders without reliable internet and easy access to information, might be excluded from the public consultation processes on the development of the Materials Matter Standard, despite the strong impact of the criteria on them. It was also noted that the increased requirements in the Materials Matter Standard could favor larger companies that are better equipped to handle the financial and logistical requirements of certification compared to smallholders.

TEXTILE EXCHANGE RESPONSE:

We acknowledge the legitimate concern that the standard team needs to be intentional in engaging with individual farmers and not only with farm groups. The following efforts are made to include smallholders who are typically harder to identify, connect with and engage meaningfully:

- a. The pilot campaign notably involves in-person and in-field engagement with smallholders. The aim is to speak directly with them, collect their individual feedback, and test the robustness and feasibility of our criteria formulation, as well as the relevance of our guidance structure and contents.
- b. We recognize our role as a scheme owner to support farming communities on their journey to certification. We expect our pilot campaign to allow us to test a communal farm model, help smallholders become audit-ready, and reap the benefits of certification.
- c. With specific regards to equity in managing the financial and logistical requirements of certification, we have sought to profile our expectations based on the nature of operations, their objective size and corresponding process maturity. As a result, the responsibility for comprehensive management systems lies squarely with larger organizations who are expected to enable their extended supply chain transition towards the Materials Matter Standard. In other words, it is the intent of the standard to expect more robust systems from these larger organizations. This way, we can channel the necessary support for smallholders and farming communities to achieve certification and progress on priority issues over time.

Some stakeholders also raised concerns around how we define small, medium, and large organizations in the standard and how these definitions connect to criteria specifying the applicability of requirements based on organizational size.

TEXTILE EXCHANGE RESPONSE:

We recognize that there are challenges with a “one-size-fits-all” definition on a global level across different materials and contexts. We are considering how to align the attributes for small producers and facilities with local laws to eliminate ambiguity and legal discrepancies. We are also looking at other classifications that could achieve our intention with how organizations demonstrate conformance. These considerations will be part of the pilot testing in 2024.

Both public consultations revealed a need for additional guidance and a user manual specifically tailored for farmers and smallholders.

TEXTILE EXCHANGE RESPONSE:

Alongside the publication of the final standard, we will release a user manual (or manuals) designed to guide standards users through their certification journey. While our current suite of standards is accompanied by individual user manuals, these documents were all drafted at different times and may benefit from being reorganized into material-specific user manuals. The same applies to templates. The harmonization of our standard system presents an opportunity to provide updated and comprehensive resources that better support standards users throughout their certification process.

We received suggestions to adjust the stringency of various criteria, with stakeholders advocating for more or less rigorous standards throughout the development process. Questions also came up regarding the level of ambition we aim to achieve with the standard, such as whether organizations are expected to implement better practices or demonstrate an exemplary level of care for animal welfare.

TEXTILE EXCHANGE RESPONSE:

When we began developing the Materials Matter Standard, we used the current suite of standard conformity levels as a baseline for the first draft. Recognizing that the same requirements across different standards could have varying conformity levels, we streamlined these where necessary. During both public consultations in 2023, we specifically asked stakeholders to flag any Materials Matter Standard criteria where they felt the conformity levels were not set correctly and why, and we received a handful of comments in response. A mapping document, scheduled for release in August 2024, will outline the required changes when transitioning from certification under one of our current standards to the new standard system, which is expected to be released in mid-2025.

Multiple comments were made about the auditing process and the time required for standard users to transition thoughtfully to the new standard system. Key concerns include:

1. Some stakeholders voiced concerns about auditors' ability and consistency in auditing to the Materials Matter Standard, especially since it now encompasses multiple fibers and materials, with more nuanced criteria for some materials, including increased human rights and livelihood criteria.

TEXTILE EXCHANGE RESPONSE:

Regarding the proposed methodology (1), particularly in relation to HR&L requirements, we suggested focusing on the risk assessment component of due diligence frameworks. Specifically, we expect certified organizations to adopt a risk-based approach, prioritizing the most salient issues and designing action plans to monitor and disclose progress over time. This approach means that certified organizations are not required to comply with all HR&L criteria at once, as not all criteria will be equally relevant to every organization. Instead, certified organizations are expected to identify which HR&L criteria are most pertinent to their operations and supply chains and provide evidence that these are being appropriately addressed within their specific contexts. With stakeholders' concerns in mind, we are currently testing the feasibility of this approach through ongoing pilots. We are exploring the possibility of requiring certification bodies and certified organizations to develop risk assessments before the audit (based on common guidance provided by Textile Exchange), to be triangulated during the audit. This process would help in setting priorities for on-site audits as a result. Additionally, we are considering adjusting the proportion of mandatory HR&L criteria, setting the threshold at a level informed by our pilot findings to ensure it is appropriate.

2. Stakeholders suggested that we conduct training for certified organization training and ensure that the auditing process is clearly communicated to the sites seeking certification well in advance to ensure a smooth certification experience. There was also a request for translations to address language barriers.

TEXTILE EXCHANGE RESPONSE:

Regarding sufficient auditor (1) and certified site (2) training, we will leverage scheduled pilots and stakeholder engagement workshops to seek the input of the certification body, certified organization, and broader stakeholder community on the structure and contents of the proposed documents associated with the Materials Matter Standard. We anticipate the following needs for additional awareness-raising and actual capacity-building:

- a. The Assurance team is currently scoping a training approach for certification bodies, assessing the necessary credentials and content priorities to cover.
- b. The Standard requires that certified organizations develop stakeholder mapping and design and implement engagement strategies tailored to their priority stakeholders and vulnerable rightsholders. These activities will hopefully support meaningful dialogue conducting to collaborative problem-solving and continuous improvement.
- c. We will also provide translations of standards documents once the final standard is released. Select Spanish translations will be made available as we move from the pilot version to the final Materials Matter Standard.

3. Concerns about the costs and the potential for audit fatigue were consistently mentioned.

TEXTILE EXCHANGE RESPONSE:

On the topic of cost and audit fatigue (3), we acknowledge certain themes have been substantially restructured (e.g., land use and animal welfare) and reinforced (e.g., HR&L) and that this generates concerns on the part of both certification bodies and certified organizations.

We recognize the limits of passing audit requirements on to suppliers in a top-down, tick-the-box approach to compliance. It is also our belief – supported by extensive academic research and NGO reports – that this is not conducive to progress overtime, and in fact creates the conditions for unwanted socio-environmental impacts. As a multistakeholder initiative, we advocate for shared responsibilities between brands and their suppliers to disperse the cost of auditing wherever possible. Due to the fact the Materials Matter Standard applies in lower tiers of the supply chain, we have not seen significant levels of audit duplication yet when it comes to HR&L topics. In fact, in most cases the main challenge is that this topic is new, not that it is being audited too much. That’s not to say that it shouldn’t be considered for the future and we are open to exploring possibilities for recognition of other standards equivalent to the Materials Matter Standard, which have coverage at these supply chain tiers.

Following a risk-based approach for the HR&L section will mean that each certified site will need to identify a relevant sub-set of criteria which are most salient to them and demonstrate compliance with those. The anticipated result would reduce the total number of HR&L criteria relevant to each site and foster alignment between the certified organization and certification body on how to prioritize audit plans, which would foster greater efficiencies in time and cost of audits.

4. Lastly, it was recommended that ample transition time be provided for certification bodies, certified sites, and sites seeking certification as they move to the new standard system.

TEXTILE EXCHANGE RESPONSE:

The first pilot version of the Materials Matter Standard was released in mid-2024 and included the transition to a harmonized standard system. For the remainder of 2024, our focus will be on feasibility testing, preparing supplementary documentation, and conducting outreach events to raise awareness among standard users. Learnings from these activities will be used to refine the criteria and related policies for the final version of the standard, which is scheduled for publication in mid-2025 following pilot testing and system updates.

The final published standard will include both an effective date and a mandatory date. The effective date, planned for the first quarter of 2026, marks when auditing and certification may begin on a voluntary basis. During this period, organizations can request an audit to the Materials Matter Standard from licensed certification bodies. This transition period will be optional for organizations already certified under current standards that will be supplanted by the Materials Matter Standard, including the Global Recycled Standard (GRS), Recycled Claim Standard (RCS), Responsible Wool Standard (RWS), Responsible Mohair Standard (RMS), Responsible Alpaca Standard (RAS), and Responsible Down Standard (RDS). Throughout 2025, new certification applicants will have the option to request an audit to either the Materials Matter Standard or the applicable stand-alone standard. However, we encourage certification to the Materials Matter Standard, as all organizations need to transition by the following year. The mandatory date is planned for the second quarter of 2026, 12 months after the final standard's publication. From this date onwards, all applicable audits – for both existing certified sites and new applicants – will be required to comply with the new Materials Matter Standard. Previous standards superseded by the Materials Matter Standard will be retired following the mandatory date.

Draft Materials Matter Standard specific feedback

General comments

The following section summarizes feedback received on the refined second draft of the Materials Matter Standard (V2.1). Where relevant, references to the first draft have been included. Significant content-specific changes from the first to the second draft and on to the pilot version have been highlighted under the ‘general feedback’ themes shared above.

Many comments on the first draft of the standard were related to questions about how specific criteria could be achieved by certified sites and verified by auditors. Most of these queries were addressed by adding an intent and clarification section to each criterion from the second draft onwards. We recommend reviewing all associated information for each criterion for more details.

Similarly, feedback on the first draft often focused on wording adjustments of specific criteria for clarity. Many of these suggestions were incorporated into the second version of the Materials Matter Standard and will not be individually listed here. Please refer to the updated the standard if you have specific criteria of interest.

Principle 1 - Organizational Management

Some stakeholders in the animal fiber sector inquired about how parallel production would apply under the Materials Matter Standard for wool, ducks, and geese. For example, if a wool producer has two fields – one with Responsible Wool Standard-certified merino sheep and one with uncertified Hampshire Down sheep – would they lose their certification eligibility under the Materials Matter Standard? Another example involved RDS groups with certified and non-certified farms based on annual variances in the number of farms within the scope.

TEXTILE EXCHANGE RESPONSE:

The intent in the Materials Matter Standard is to prevent parallel production within the same farm. This means that a farm cannot simultaneously have both certified and non-certified herds or flocks on-site. For example, in down production, a farm cannot rear a certified flock, slaughter it, and then rear a non-certified flock. A farm is defined as land under the same management (i.e. the same farmer). However, the standard does not extend this requirement to all the farms owned by the same company. We have clarified this intent in the transition from the first two drafts to the pilot version now publicly available.

Several stakeholders noted that they already have a written management plan under ISO 9001/ISA14001 and asked whether adherence to these standards would meet the management plan criteria requirements in the Materials Matter Standard.

TEXTILE EXCHANGE RESPONSE:

In general, having any ISO certification is a good starting point for the organization but isn't enough. The Materials Matter Standard includes specific requirements that an ISO standard might not contain. It is ultimately the CB's and auditor's role to decide whether the existing protocols they audit on-site meet the Materials Matter Standard criteria or not.

Principle 2 - Human Rights and Livelihoods

Policies, management systems and records

A stakeholder expressed concerns about the documentation review process, particularly criterion 2.1.7, asking whether CBs would be expected to check contractor pay slips.

TEXTILE EXCHANGE RESPONSE:

Auditors are expected to request evidence of contracting practices from the certified organization, but this process is not limited to checking pay slips, which may be challenging. In practice, auditors review a representative sample of contracts and other evidence to verify that the certified organization has effective control measures in place. These measures should ensure that subcontracted workers receive remuneration and working conditions comparable to those of directly employed workers. This includes incorporating relevant requirements into subcontractors' contracts and conducting physical visits to subcontracted sites. Additionally, the audit findings should be triangulated through management and worker interviews.

There was concern about the appropriateness and/or expectations of auditor responsibilities, especially regarding entering workers' homes to verify conditions like drinking water safety.

TEXTILE EXCHANGE RESPONSE:

In some countries, water safety for workers may be verified through sampling of legally required water safety tests, recognizing that in other regions, such regulations may not be enforced or even exist. Despite this, access to safe drinking water is essential for ensuring workers' health and safety. Therefore, auditors are expected to seek evidence that the drinking water provided is indeed safe, corroborating this information through worker interviews and onsite observation. Textile Exchange acknowledges concerns about the potential invasion of workers' privacy during audits when requesting access to their accommodation. Auditors are required to obtain workers' consent before entering their living spaces and must respect their decision if they decline. If workers do consent, auditors are required to be respectful and minimize the time spent in the accommodation, focusing on identifying any risks to workers' health. The intent of the Materials Matter Standard's requirements regarding worker accommodation is not to scrutinize individual homes but to identify, through sampling, any instances of inadequate living conditions or services provided by the employer (e.g., maintenance, electricity, water appliances). Such inadequacies are recognized by the ILO as potential indicators of forced labor.

Some stakeholders noted that requiring growers to have written statements about their stakeholder engagement might reduce genuine engagement, turning it into a tick-box exercise.

TEXTILE EXCHANGE RESPONSE:

Engagement and record-keeping obligations are a balancing act. The intent and clarification attached to each requirement places a priority on engagement over written documentation, particularly for smaller organizations. The long-term vision is that the standard considers recordkeeping comparable to the organization's size and capacity.

Regarding the requirement for organizations and sites to index prices to inflation, stakeholders pointed out that feedstock costs fluctuate significantly, raising concerns about how to reconcile unstable market pricing with this criterion.

TEXTILE EXCHANGE RESPONSE:

Considerations tied to livelihoods enhancement (2.4) are leadership criteria and therefore not mandatory at this time. However, these criteria may become mandatory in the future for larger organizations. Including these leadership criteria has two main purposes:

- Evaluate to what extent inflation is factored into worker payment systems and wage level setting.
- Help ensure that lack of this practice is not indirectly increasing the living wage gap for workers.

We received the following feedback from stakeholders on the inclusion of HR&L requirements:

1. Farmers, producers, and farm groups generally support the principles of the standard are concerned that new certification requirements are being introduced at a time when rising costs already threaten the cost-benefit of certification participation.

TEXTILE EXCHANGE RESPONSE:

Rising or fluctuating prices pose significant challenges for producers. The long-term vision of the HR&L criteria is to help producers strengthen their ability to meet global standards on Human Rights due diligence while reducing risks, including those to their own businesses. Some criteria in the pilot version of the standards may affect the audit process, particularly in terms of duration and expertise, which can lead to higher costs. We are actively engaged in pilot testing these criteria across different contexts and collaborating with certification bodies to find efficiencies, mitigate certification cost increases, and ensure that certified organization remain accessible to certification.

2. The HR&L section has raised concerns due to additional recordkeeping requirements, which could lead to higher certification costs.

TEXTILE EXCHANGE RESPONSE:

Across standard themes, we specify which documentation is essential and encourage auditors to consider evidence of engagement and practical action rather than only relying on written documentation, particularly for smaller organizations. Our long-term vision is that the standard considers recordkeeping comparable to the organization's size and capacity.

3. Stakeholders emphasized the need to consider regional variations and practical implementation at each site, ensuring that EU/US legislation and common practice are contextualized, and that guidance is tailored to local operational specifics. There is concern about not creating a disproportionate documentary burden, particularly for smaller farms and facilities.

TEXTILE EXCHANGE RESPONSE:

Certification bodies regularly curate legislative checklists to ensure their auditors are duly equipped to identify local and regional variables. However, the HR&L section of the standard considers how to provide the greatest benefit to the worker, including local laws, collective agreements, industry and global standards, and frameworks. The intention is for the standard to reflect decades' worth of globally recognized frameworks development, including but not limited to recent European and American regulatory developments.

4. Certification bodies provided feedback on the depth to which HR&L criteria should be audited, particularly concerning outsourced labor.

TEXTILE EXCHANGE RESPONSE:

As with other HR&L criteria, our proposed approach is risk-based. This means that if a producer regularly relies on outsourced labor at scale, it is expected that the hiring practices of the labor provider will be risk-assessed as a first step. If necessary, the producer must then implement requirements around ethical hiring. This would be a minimum requirement for the audit. However, if a smallholder farmer does not employ any labor, the criteria related to outsourced labor would be considered irrelevant.

Labor rights, social justice and livelihoods

Various pieces of feedback include:

1. Concerns were raised about the difficulty of enforcing average workweek hours without considering regional or local specifics. It was suggested that we cross-check working hour requirements with wage payment records, as some criteria reference CBA-negotiated working hours and overtime arrangements, but not the wages

criterion. Auditors should clearly understand the need to triangulate employer statements about hours worked against worker interviews.

TEXTILE EXCHANGE RESPONSE:

In line with stakeholders' recommendations, we expect auditors to triangulate documentation provided by certified organizations through worker interviews, desktop research, local expert engagement, and on-site observation. This is applicable to the entirety of the HR&L criteria, and not only to working hours.

2. Some stakeholders noted that the criteria on working hours seem tailored to factory settings and do not fully capture the realities of farm work. For example, in some livestock operations, workers might have a 12-day work period followed by a full weekend off every other week, with exceptions during harvest times.

TEXTILE EXCHANGE RESPONSE:

Following the second public consultation, an overtime exemption was included. This allows for working hours to be higher than the prescribed limit, under exceptional circumstances including high productivity demand and unforeseen events. The focus is then put on establishing that extreme overtime is not built into standard production plans and that there are genuine efforts and systems to keep it to a minimum.

Feedback highlighted the need for flexibility regarding overtime, particularly in rural areas where more than 12 hours of paid overtime might be necessary. It was recommended that we provide clearer guidance and that CBs confirm records are kept, ensuring employees are adequately compensated for standard and overtime hours.

TEXTILE EXCHANGE RESPONSE:

Recognizing that farms are particularly sensitive to seasonal variations and that the animal welfare expectations of the standard require consistent care, revisions to the standard introduced a seasonal exemption. This exemption is intended to be truly exceptional, ensuring that certified organizations use it to address specific farm needs rather than as a structural practice inherent to their business models. The purpose of this criterion is to support organizations address systemic issues related to excessive working hours and ensure overtime is not enforced or overused. The standard requires that overtime be strictly voluntary. We understand that there may be acceptable arrangements between farmers and workers that do not fully align with the exemption terms, provided their voluntary nature can be demonstrated through formal agreements, such as collective bargaining. The practicality of the proposed approach will be tested during farm pilots and stakeholder workshops, and it will be refined accordingly.

We received feedback on financial systems and management:

1. While fair pricing principles are understood, some stakeholders expressed doubts about their applicability, especially in auction-based and global market. There were also concerns about sharing sales information with auditors.

TEXTILE EXCHANGE RESPONSE:

All expectations around fair pricing are linked to leadership criteria and therefore not mandatory for any organization regardless of size or structure. Data collection related to raw material pricing is entirely voluntary. We recognize that financial information is often sensitive, and some stakeholders may be uncomfortable disclosing it. The aim of collecting this data is to monitor and address situations where raw material prices are set below a level that allows producers to cover all their expenses, and to understand the potential impact on workers, such as wages. We are currently exploring ways to strengthen, adapt, or replace this criterion with an alternative approach that achieves the same goal.

2. Regarding financial help for workers in the form of loans, stakeholders suggested that we specify that interest rates on personal loans should not exceed those set by government-regulated financial institutions. Additionally, to avoid taking advantage of the loan requester, criteria should ensure that loan applications are facilitated responsibly, with necessary documentation provided when obtaining a personal loan from conventional financial institutions.

TEXTILE EXCHANGE RESPONSE:

The feedback we received on this matter was extremely helpful and was incorporated into the standard criteria. This will be further explained in additional guidance.

We received feedback relative to contracting third-party workers and responsible management of recruitment fees:

1. It was recommended that the responsible party for recruitment fees be clearly defined if the “no fees” expectation is not met. The language should specify that workers do not bear any costs associated with their recruitment, hiring, or employment under any circumstances. The prohibition on worker-paid recruitment fees should apply universally, including to small producers, with a requirement that workers be reimbursed within 30 days if fees are discovered during the recruitment process.

TEXTILE EXCHANGE RESPONSE:

Stakeholder feedback on recruitment fees, including the need for repayment, when necessary, was incorporated into the standard revision. The goal was to reinforce an organizational commitment to the Employer Pays Principle, meaning that certified organizations must ensure workers do not bear any recruitment, hiring, or employment fees under any circumstance. Acknowledging that this issue can be particularly challenging for small farms, we plan to test a scaled approach for repaying undue recruitment fees during pilots and outline good practices and timelines, as recommended by stakeholders in our upcoming user manuals.

2. Some stakeholders felt it would be challenging to control subcontracted labor effectively. There is concern that contractors might withhold hiring information to prevent farmers from directly hiring individual shearers to save money.

TEXTILE EXCHANGE RESPONSE:

The expectation that producers manage subcontracted labor primarily concerns how they select, communicate with, and engage their subcontractors. This relates to the way they conduct their business and use their leverage, such as purchasing power and supply chain engagement. It is not expected that producers will directly control the subcontractors' hiring or treatment of workers. Instead, they are expected to:

- a) Communicate standard expectations regarding working conditions and ethical hiring to subcontractors, either verbally or in writing (e.g., through contracts).
- b) Conduct a basic risk assessment on their subcontractors' activities.
- c) Require subcontractors to address any issues identified. This could involve asking the subcontractor to take corrective action or choosing not to renew the contract if they do not comply.

If the risk assessment does not reveal any concerns, the producer is still expected to communicate the HR&L criteria to the subcontractor, though no corrective action may be needed.

We received feedback on the topic of child/forced labor, flagging the lack of clarity on whether these criteria apply to farms and processing facilities alike, and how they apply to small, medium, and large farms respectively:

1. There was concern about the requirement for organizations to pay for education and/or ensure that children living on-site have access to age-appropriate schooling.

TEXTILE EXCHANGE RESPONSE:

The standard does not require certified organizations to pay for schooling or ensure that children living on-site have access to age-appropriate education. However, it does expect certified organizations to provide evidence of practices aimed at preventing, identifying, and addressing known instances of child labor. With that in mind, we note that engaging with communities, including school personnel, is one of several relevant tools that certified organizations can consider, where appropriate, to provide meaningful remedies.

2. Stakeholders added that some regional laws permit work at certain ages, and privileging minimum working ages above local legislation could hinder social and economic development.

TEXTILE EXCHANGE RESPONSE:

In line with stakeholders' feedback, we note that definitions of child labor vary across countries and sectors. The Standard references ILO Conventions, setting the minimum working age at 15 years (13 for light work) and the minimum age for hazardous work at 18 (16 under certain strict conditions). We acknowledge the need to adapt to contexts where economic conditions and educational facilities are underdeveloped. The intention is to encourage certified organizations to work towards what is most favorable to the child's health, development, and morals. We are committed to testing these requirements and providing supporting guidance through our ongoing pilot campaign and stakeholder engagement workshops.

3. Stakeholders requested more clarity on the precise remediation steps to be taken if forced labor is found.

TEXTILE EXCHANGE RESPONSE:

The Standard lays out similar expectations for the remediation of forced labor. A stepwise approach will be included in the user manuals, subject to feedback from pilot testing and stakeholder engagement workshops.

We received stakeholder feedback relative to receiving and handling complaints:

1. Some stakeholders recommend including a non-retaliation policy to protect workers who report harassment or discrimination in good faith, including protection against pregnancy discrimination.

TEXTILE EXCHANGE RESPONSE:

In response to stakeholder feedback, the standard revisions now include the expectation that certified organizations implement a non-retaliation policy and provide evidence that workers are not coerced into silence or retaliated against for voicing concerns.

2. Feedback suggested that grievance mechanisms should include an option for anonymous submissions, a system for tracking and communicating grievance processes with clear timelines (including for anonymous grievances), and a method for soliciting worker feedback on grievance channels to monitor effectiveness.

TEXTILE EXCHANGE RESPONSE:

The standard revisions clarify that certified organizations are expected to manage anonymous grievances like any other grievances. A stepwise approach and timeline recommendations for handling grievances will be included in the upcoming user manuals, informed by pilot learnings and stakeholder workshops. The goal is to help certified organizations improve the accessibility of their grievance mechanisms and monitor their effectiveness through intentional engagement with stakeholders, particularly vulnerable rightsholders.

Principle 3 - Land Use

General comments

Initially, the first draft of the standard included criteria addressing cotton production at the farm level. However, it was later decided to remove these criteria in favor of a recognition approach (see general feedback on cotton and excluded fibers from the first to the second draft at the beginning of this document). While some comments in the second draft of the standard suggested applying certain criteria to cotton, the farm-level criteria remain applicable to the recognized fibers being certified alone.

Regarding the ease of implementation of applicable criteria, stakeholders requested training resources, templates, and measurement guidance for the land use section. There were concerns about whether management plans would consider contextual nuances. The intent is to update the user manuals, building on existing guidance and templates from the RAF, which will accompany the final Materials Matter Standard and provide further support for implementation. There is a broad contextual variation regarding land use across production regions leading to the templates highlighting necessary sections or considerations while allowing flexibility for producers to describe context-specific actions.

Some stakeholders expressed concerns about how the Materials Matter Standard's approach to land use differs from current standards and how to comply with the requirements during their transition to the Materials Matter Standard. The land use section remains largely unchanged from the RAF, with added emphasis on monitoring various land management aspects and the state of natural resources. Most user manuals and associated templates will build on existing RAF user manuals and templates, with only minor adjustments anticipated.

Management plan

Comments and/or suggestions made around management plan criteria included:

1. Some land use requirements are often already mandated by law or practiced regionally, potentially making certain criteria duplicative and requiring auditors to exercise legal judgment beyond their expertise.

TEXTILE EXCHANGE RESPONSE:

We acknowledge that while some countries have legislation in place supporting many land use requirements, not all do. Therefore, it is essential to include key requirements as criteria to ensure these practices are supported, regardless of local legislation. However, if a country has reporting requirements for key legislative considerations, such as water use measurements, these reports can be used to support management plans under the standard if they address the relevant considerations outlined.

2. There was some uncertainty around the feasibility of updating management plans annually.

TEXTILE EXCHANGE RESPONSE:

Audits are carried out annually, necessitating annually updated plans in alignment with the audit cycle. However, we expect that not all elements of the plans will change annually; only those that have will need updating. The goal of an annual plan review is to promote an adaptive management approach, allowing plans to be adapted frequently based on monitoring findings or changes in environmental variables.

3. Suggestions included adding management planning considerations from other sub-sections into the management plan and considering combining all the sub-section management plans (e.g., water, nutrient, IPM, and biodiversity) into an overarching plan.

TEXTILE EXCHANGE RESPONSE:

To clarify the purpose of the management plan in this sub-section, it was renamed the Soil and Land Health Management Plan. This ensures that users understand it specifically addresses soil and vegetation management in grazing systems. Collectively, all management plans within each sub-section of the Land Use section form the comprehensive Land Use Management Plan.

4. Regarding the criteria asking for creators and implementors to be knowledgeable to plan or implement the plan, it was flagged that requiring expertise in current best practices could place a high burden on workers.

TEXTILE EXCHANGE RESPONSE:

The requirement for workers knowledge applies to all levels of responsibility, meaning that farm managers, workers, or contractors must be competent in their roles. They are encouraged to seek additional guidance from resources available on or off the farm to as needed.

Soil health

Comments and/or suggestions made around soil health criteria included:

1. There were questions on whether the Soil and Land Health Management Plan should describe management techniques to address the listed plan considerations or demonstrate output benefits or outcome measurement. A similar question was raised

regarding the implementation of restoration activities and whether the action taken or proof of positive restoration outcomes need to be submitted to become certified.

TEXTILE EXCHANGE RESPONSE:

The Soil and Health Management Plan requires a description of how management actions address the different focus areas outlined in the standard. While the criteria support the basis for driving beneficial outcomes, the standard does not monitor the performance of the outcomes as a requirement of certification. The plan does however mandate the implementation of monitoring systems to track the impact on soil and land health indicators and the effectiveness of restoration activities. Certification requires that these plans exist, but not the specific performance level of the outcomes.

2. Concerns were raised about the economic feasibility of immediate land or soil restoration activities, given the context-specific nature of soil and land health.

TEXTILE EXCHANGE RESPONSE:

The Land Use section acknowledges that land management is context-specific, depending on resource availability and recognizing that restoration activities can be costly and resource-intensive. The standard requires that restoration is approached strategically over time, considering the threat level and feasible interventions implementable to the producer.

3. Stakeholders requested guidance on developing monitoring strategy and raised concerns that new requirements might invalidate existing RAF framework strategies. There were some associated comments regarding the requirements for a regenerative system to raise the level of conformity for monitoring or the use of soil scientists to audit outcomes.

TEXTILE EXCHANGE RESPONSE:

The requirement for a monitoring strategy does not render previous monitoring strategies obsolete but aims to enhance them, ensuring that monitoring efforts are comprehensive and consider all elements of land management (as it is a recurring theme throughout the sub-sections of the Land Use section) and is robust in terms of distribution and scale. Further guidance on developing a monitoring strategy will be provided in the User Manual. While suggestions for more stringent outcome monitoring have been noted, the standard envisions context-specific implementation of outcome monitoring in line with the Regenerative Outcome Framework.

Soil nutrients

Comments and/or suggestions made around nutrient management criteria included:

1. Some stakeholders wanted the Nutrient Management Plan to explicitly include natural fertilizers or manures alongside synthetic fertilizers and clarify their nutrient application.

TEXTILE EXCHANGE RESPONSE:

In response to requests for a comprehensive approach to nutrient management (natural or synthetic), we have renamed this sub-section “Nutrient Management” from its previous title “Fertilizer Management Plan” as seen in Draft V1.0 and the RAF framework. The intent and clarification descriptions have been updated accordingly.

2. Questions were raised about the feasibility, applicability, and relevance of the Nutrient Management Strategy especially for producers not reliant on large-scale cropping systems.

TEXTILE EXCHANGE RESPONSE:

More clarity has been provided in the intent and clarification. The Nutrient Management Plan now applies to any system utilizing nutrient applications as part of animal production management. The level of detail required in the plan will vary based on the management effort and the local context, making it feasible across systems. Some criteria related to cotton, which were considered in Draft V1, were removed based on applicability feedback from reviewers.

3. There were suggestions to consider additional factors, such as local regulations, when establishing buffer zone sizes and to set a minimum width that always applies.

TEXTILE EXCHANGE RESPONSE:

We understand the need for meaningful buffer zones regarding nutrient risk (size and location). However, due to the variability in environmental characteristics, risk levels and nutrient application methods, standardizing a minimum size for buffer zones is not feasible.

Pest management

A handful of suggestions were made around integrated pest management criteria, such as:

1. Making Integrated Pest Management (IPM) plans specific to actual pest problems that farmers need to treat, detailing training on ecological practices, identifying barriers to adoption and approaches taken to overcome them, and including specific physical, cultural, and biological methods used to prevent and treat pests and their timing.

TEXTILE EXCHANGE RESPONSE:

The IPM plan must be tailored to the local context, including the pest threat level and the producer's interventions, as the methods and uses vary from farm to farm. The plan requires strategic pesticide use to minimize environmental risks associated. This recognizes that the level of detail in these plans will vary according to the local context where lower-risk farms will need less detail in their plans than those relying more heavily on the application of pesticides for management in higher-risk areas.

2. Some stakeholders felt that the criteria should align more with UN FAO/WHO and PAN criteria, with concerns that criteria leaned too much towards organic requirements unnecessary for animal fiber standards, as the use of synthetic pesticides and fertilizers is already low for animal fiber production.

TEXTILE EXCHANGE RESPONSE:

Following extensive field visits and feedback, the criterion listing prohibited Highly Hazardous Pesticides has been removed until further multi-stakeholder engagement can be completed, and a stance can be taken. This criterion, originally added for cotton, is less relevant for animal fiber production and holds significantly less risk.

3. Numerous comments called for greater clarity and consistency within areas in the sub-section.

TEXTILE EXCHANGE RESPONSE:

Numerous updates were made to the intent and clarification descriptions, as well as wording changes to criteria, throughout the review process.

Water management

Only a handful of comments were made on the new water management section introduced as part of the Materials Matter Standard alignment with Textile Exchange's Climate+ strategy:

1. Questions arose about the need for a water management plan if local legislations already cover water use.

TEXTILE EXCHANGE RESPONSE:

It is risky to rely on national or regional legislation for addressing these focus areas as such legislation is not available everywhere. Where relevant legislations exist and are monitored by government agencies, these findings can support one's water management plan where relevant.

2. Stakeholders emphasized the need to manage all surface water sources, including avoiding the use of industrial wastewater and sewage water, rather than relying solely on groundwater.

TEXTILE EXCHANGE RESPONSE:

Although it was noted that wastewater and sewage should be strictly avoided, this was not detailed in the criteria due to its lower risk in animal fiber production systems. The plan addresses both above- and below-ground water resources used for irrigation.

3. A suggestion was made to include a water irrigation volume requirement in the water plan.

TEXTILE EXCHANGE RESPONSE:

A criterion was added to record water abstraction rates, though this method of monitoring abstraction may not be applicable in all production areas.

Biodiversity management

Comments and/or suggestions made around general biodiversity criteria included:

1. It was suggested that we align with the Global Biodiversity Framework (GBF) in its overarching goals and adopts a 50% reduction target by 2030 (Target 7).

TEXTILE EXCHANGE RESPONSE:

While the standard acknowledges global biodiversity goals outlined by the Global Biodiversity Framework, it does not require that producers meet these targets at a farm level. Instead, it focuses on best practices and foundational support for beneficial climate and nature outcomes, without requiring performance toward global for certification. Farms aiming to meet these goals can demonstrate their performance of outcomes through additional programs, such as the Regenerative Outcome Framework.

2. Stakeholders recommended recognizing practices supporting biodiversity, such as organic farming, species-beneficial habitat creation, and elevating the need to take an ecological systems approach to land management to benefit biodiversity.

TEXTILE EXCHANGE RESPONSE:

Although many practices could support good biodiversity management of biodiversity, many of these only apply to certain contexts. The standard emphasizes foundational practices for good land management applicable globally applicable, without capturing all possible management interventions. The use of these different management interventions remains part of the host of actions available to producers to meet the foundational practices prescribed by the standard in line with their specific contexts.

3. There were requests for clarity on the spatial data support that the Textile Exchange Climate+ team could provide. This linked to other questions about the need for expert input to understand the distribution, state, and management of the different biodiversity-related values on farms.

TEXTILE EXCHANGE RESPONSE:

The Biodiversity Management Plan requires producers to identify and manage biodiversity and conservation priorities on their farms, aiming to reduce risks to these and encourage beneficial impacts over time. To assist producers, we plan to further refine the required Farm Questionnaire attached to the standard and integrate farm boundaries to some of the key biodiversity conservation planning layers. Further guidance and templates will be provided in the user manual to support producers with meaningful planning while minimizing the need for external expert inputs.

4. It was recommended to extend criteria related to deforestation and natural ecosystem conversion to include biomaterials, cotton, natural plant fibers, and MMCFs to the materials this criterion applies to.

TEXTILE EXCHANGE RESPONSE:

The prohibition on deforestation and land conversion has been aligned to the sphere of influence of the standard. This criterion applies specifically at the farm level, where these actions occur. The suggested fiber and material additions are not addressed within the standard at the farm level.

5. Regarding GHG accounting tools, stakeholders flagged that the scope and ambition of the standard seem difficult to achieve and complex for animal fiber producers. It was also recommended to make GHG accounting tools a leadership criterion for processors and to provide templates or resources for these tools outside of the standard.

TEXTILE EXCHANGE RESPONSE:

GHG accounting is recommended but not required, recognizing its complexity and difficulty of application at the farm level. Farmers who can report against the industry target of a 45% reduction in GHG emissions are encouraged to do so.

Human-wildlife coexistence

Drawing on comments highlighting different non-predator species that may need management in animal fiber production systems, the predator conflict criteria in the RAF framework were expanded to include all wildlife, emphasizing a more positive outcome approach to human-wildlife coexistence.

The pilot version includes a new criterion specifying the strict conditions and requirements for baiting programs to manage specific conflicts with invasive species that cannot be resolved through other means. Feedback from the review of the first draft highlighted the need for greater clarity on this and led to its expansion with sub-criteria, rather than the originally proposed list, each with its own intent and clarification. This ensures that baiting programs are only used under extreme conditions, where other interventions have failed, and only if all sub-criteria are met. Draft V2.0 received comments on the feasibility of meeting all the sub-conditions, with some stakeholders expressing concerns about the welfare implications for both targeted and non-target species. There was a consensus that the strict sub-conditions should remain to ensure that baiting programs are implemented only in exceptional circumstances where invasive species threaten the biodiversity of natural fauna or flora, rather than only posing a threat to livestock.

Other comments made regarding human-wildlife coexistence criteria included:

1. a) A need for clarity on whether invasive species are considered separate from wildlife, whether exotic or not (e.g. grey kangaroos in Australia), and how to address endemic species related to prohibited lethal control leading to vague audit requirements.
b) An ask to provide a list of endemic animals for each territory.
c) How to address individual animal criteria if it's a general issue with a species (e.g. red foxes in Australia or Guanaco in Peru and Bolivia).

TEXTILE EXCHANGE RESPONSE:

We recognize that different species present varying levels of threat to animal fiber production systems and their associated environments. The criteria for human-wildlife coexistence have been carefully designed to address these threats accordingly. Baiting interventions are permitted only for invasive species causing regional biodiversity loss, and only under strict conditions that reduce suffering and environmental risk. For all other species, whether invasive or not, the criteria require humane management with minimal impact on other species and the environment. The emphasis is on strategic and proactive management rather than resorting to lethal control as a default. Endemic species have been removed from the protected species criteria, as not all are classified as needing protection due to healthy population numbers. If populations of endemic species become threatened, they will be reclassified under the IUCN threat status categories or local/regional protections, and then the prohibition would apply.

2. Queries were raised about how to best demonstrate that non-lethal methods have been unsuccessful.

TEXTILE EXCHANGE RESPONSE:

The criteria stipulate that lethal control should only be used after non-lethal control mechanisms have failed. The standard now includes clearer guidance, such as maintaining evidence or records of past non-lethal interventions and explaining why they were deemed unsuccessful.

3. Queries were made about which animals should be included in records of lethal control use.

TEXTILE EXCHANGE RESPONSE:

Records need to be kept for any lethal control measures used in response to a conflict, though this does not include control of pests, like mice or rats.

Principle 4 - Animal Welfare

General comments

Clarity around animal welfare leadership criteria remain high priorities for stakeholders:

1. Stakeholders expressed difficulty in finding the right conformity level for each criterion (e.g. when to make a criterion mandatory vs. voluntary).

TEXTILE EXCHANGE RESPONSE:

The approach to identifying recommendations as leadership criteria, which are voluntary for conformance, has been carefully considered to balance practicality, achievability, and animal welfare benefits. In the review of the Responsible Animal Fiber (RAF) standards, existing recommendations were scrutinized, and some have been proposed to be elevated to conformance-related requirements, making them mandatory for certification. This reflects a strategic shift to ensure that the standard remains both rigorous and achievable, while also encouraging continuous improvement and best practices among certified organizations.

2. Some stakeholders suggested creating a higher tier of animal welfare certification for producers who exceed, or are required by their buyers to exceed, basic animal welfare standard requirements. This suggestion includes elevating some leadership (recommended) criteria in the pilot version of the standard to requirements for this higher tier of welfare recognition.

TEXTILE EXCHANGE RESPONSE:

An additional tier of certification could enhance animal welfare on a limited number of certified sites but tracking specific materials through supply chains would be challenging. Typically, certified materials from different sites are usually consolidated, and introducing a higher certification would complicate this process. The Responsible Down Standard (RDS) already includes an additional voluntary module covering sites with parent flocks that are outside the RDS supply chain, but this has seen limited uptake and support.

3. Some reviewers suggested that the standard should mandate greater veterinary for treating animals, performing painful husbandry procedures, tooth rasping or grinding for alpacas, changing feeds, and similar situations.

TEXTILE EXCHANGE RESPONSE:

The standard requires that workers not only receive training, but also possess the competence to recognize when veterinary or expert assistance is necessary. While a well-trained worker can adequately meet the needs of animals in many situations, the range of possible scenarios requiring veterinary input is so broad that, aside from specific cases already addressed by the standard, such as all cesarian sections must be performed by veterinarians, it is not possible to mandate the exact circumstances under which they must be called.

Stakeholders raised concerns about the lack of regional context within the standard concerning animal welfare requirements:

1. Some stakeholders are confused about when legal guidelines should take precedence over the standard and vice versa. Others were concerned that certain legal guidelines in other countries are more stringent than the standard, while some were worried that the standard includes requirements aligned with EU law, which exceed the welfare regulations of many other countries.

TEXTILE EXCHANGE RESPONSE:

The Materials Matter Standard mandates adherence to all applicable laws and regulations, consistent with existing RAF standards. Both the RAF framework and Materials Matter are global standards and are not designed to align with specific national legislation. The contrasting comments noted above – some saying that the standard falls short of legal requirements, others saying it exceeds them – highlights the global nature of the standard. The position remains that where local legal requirements exceed the standard, the legal requirements must be met. If the standard exceeds local legal requirements, those seeking certification must comply with the standard.

2. A question was raised about how no-stun slaughter for religious reasons aligns with the standard.

TEXTILE EXCHANGE RESPONSE:

No-stun slaughter for religious reasons does not align with the standard's requirements. The standard aims to define best practices for animal welfare at slaughter/killing based on scientific research, rather than aligning with religious or cultural norms. This approach in the Materials Matter Standard is consistent with the current position in the RDS and RAF standards. It is also worth noting that the slaughter module, under which skins from fiber animals may be certified, is voluntary, not mandatory.

Stakeholders requested rigorous document control, tools for proper handling, care, treatment, morbidity, and illness management, as well as guidance for clarity during audits and traceability purposes.

1. Feedback emphasized the need for detailed and rigorous documentation and record keeping across animal welfare training and criteria to ensure clarity, robustness, and transparency during auditing and for traceability purposes. Some stakeholders suggested that such documentation should be included in the health and welfare plan. Others feel that farmer documentation should be a major requirement and that farmers will need tools and help to understand the purpose of cooperating with standard requirements. Some are concerned with the burden of the documentation – given over 150 animal welfare criteria in the Materials Matter Standard pilot version – might be overwhelming for both farmers and auditors. Stakeholders also emphasized the importance of including biosecurity or pandemic emergencies in these plans.

TEXTILE EXCHANGE RESPONSE:

The Materials Matter Standard maintains the existing requirements from both the RAF framework and RDS standards for various records and plans. The key plans, such as the animal health and welfare plan, are already classified at the major conformance level, as requested by some stakeholders. Regarding concerns about workload, the number of animal welfare criteria in the Materials Matter Standard specific to each species is either equal to or less than those in the current Responsible Animal Fiber standards. For the Responsible Down Standard, the transition to Materials Matter Standard has led to an increase in the number of criteria. However, this is due to alignment across all key welfare topics with animal fibers, which was a primary reason for developing the Materials Matter Standard. Given that this number of criteria has been successfully audited in the animal fiber sector for many years, we expect this will also be achievable for down.

2. Stakeholders have asked for a digital IT system or toolkit, as well as templates, to help track documentation and collect data for auditing purposes. For example, the Good Cashmere standard was prepopulated and did not require internet as brokers helped farmers in-app and auditors read the document before going to the farm. Some stakeholders suggest using the recognition program to find already existing data collection tools and avoid duplication of paperwork/record keeping.

TEXTILE EXCHANGE RESPONSE:

The adoption of a digital data collection tool is seen as an implementation choice rather than a mandatory requirement within the standard. We acknowledge the different levels of access to technological solutions among stakeholders in the animal materials sector and will not make the use of such technological tools obligatory. However, we continue exploring and developing solutions that facilitate the creation and presentation of plans and records for audit purposes.

Some stakeholders have reported issues with CBs misinterpreting and incorrectly enforcing standard requirements. For example, a requirement for shade and shelter for fiber animals was interpreted by some as needing to be present in all areas, while an Alpaca breeder pointed out that such provisions are only necessary under specific conditions due to the animals' adaptation to their native landscapes.

TEXTILE EXCHANGE RESPONSE:

To address these concerns, the current RAF standards are accompanied by user guidance that provides additional details on compliance expectation, as well as more detailed guidance documents and templates. For the Materials Matter Standard, an Intent and Clarification section is included for each criterion, offering detailed explanations of the intent behind each and what auditors should assess. Some of this information was previously in the user guidance, while some of it is new. This ensures that both certified organizations and auditors have a clear and consistent understanding of the expectations and provide detail, for example on the requirements for shade noted above.

Regarding the introduction of a criterion requiring stakeholders to foster positive human-animal relationships, opinions were mixed. While some welcomed the inclusion, others viewed it as un-auditable and suggested its removal.

TEXTILE EXCHANGE RESPONSE:

The inclusion of this criterion reflects a broader shift in the Materials Matter Standard towards recognizing the Five Domains of animal welfare, emphasizing not just the avoidance of negative welfare outcomes but also the promotion of positive experiences for animals. In response to concerns about auditability, the Intent and Clarification section was expanded to include examples of actions that could fulfill this criterion, such as prohibiting shouting or whistling, avoiding the use of dogs, or ensuring workers are trained in low-stress handling techniques.

Reviewers recognized the need for robust, auditable worker training and competency as a key requirement for delivering good animal welfare outcomes. They emphasized that this should be explicitly stated in the standard requirements. During the review of draft criteria, some reviewers expressed concerns that the training and competency requirements might not be sufficiently detailed or auditable.

TEXTILE EXCHANGE RESPONSE:

The standard now includes a combined requirement across all species that workers must be trained and competent. To enhance clarity and address reviewer comments, more details were added to the intent and clarification section, explaining how auditors can assess this and specifying key topics on which workers must demonstrate knowledge and practice alignment with the standard. Given the critical role of trained and competent workers in maintaining animal welfare, this criterion has been designated as critical for conformance.

Animal Health and Welfare Plan section

We received substantial feedback on the health and welfare plan requirement:

1. Feedback suggested upgrading the recommendation for an annual veterinary review of the Animal Health and Welfare Plan for down producers to a minor conformance level. Additionally, there was a proposal to make this requirement applicable to all farm sizes and animal-derived materials, with a recommendation for more frequent veterinary visits.

TEXTILE EXCHANGE RESPONSE:

The recommendation for down producers to have a veterinarian reviews the Animal Health and Welfare Plan has been upgraded to a minor conformance level criterion. Given that down-specific criteria already require at least annual veterinary visits, it was deemed reasonable to require that the veterinarian reviews the Animal Health and Welfare Plan during these visits. However, exemptions for smallholder down producers remain in place, recognizing the challenges they faced in accessing veterinary care. Additionally, in draft V2.0 of the standard, this requirement has been extended to cover animal fibers. The suggestion for more veterinary visits was not adopted – see point 2 below for challenges to accessing even annual veterinary oversight for many farms.

2. In response to the addition of veterinary review requirements for animal fibers, some stakeholders raised significant concerns. They noted that, depending on the country, there is often a shortage of veterinarians available to work with livestock, making it challenging to meet all these requirements. The requirement for veterinary oversight could undermine the expertise and professionalism of experienced growers who already use veterinarians, when necessary, particularly in emergencies or for guidance. However, veterinarians call out fees, appointments, or inspections can be prohibitively expensive. Some stakeholders recommended a generic management plan developed by a vet that farmers can amend to suit farming practices, while others feel remote veterinary input makes these requirements accessible for everyone. The worry is that unless it's a free service or funded from industry, small-scale farmers may not have access.

TEXTILE EXCHANGE RESPONSE:

To address these concerns (as part of the review of Draft V2), the criterion requiring veterinary oversight of the health and welfare plan for certified sites producing animal fibers has been reclassified as a leadership criterion. It remains a requirement for down producers.

3. Additionally, some stakeholders suggested that surveillance, treatment, and preventative management plans should be part of the Animal Health and Welfare Plan. These plans would require veterinary or similarly qualified specialist advice and be reviewed at least every three years. We also received comments that the certified site should address health issues rather than just planning and monitoring.

TEXTILE EXCHANGE RESPONSE:

Monitoring and prevention of health issues are already requirements in the animal Health and Welfare Plan, as well as in RAF and RDS. For comments on veterinary input see points 1 and 2 above. Action beyond planning and monitoring animal health is covered in a separate criterion requiring action whenever diseases or injuries are identified.

We received feedback concerning the inspection and monitoring of animals:

1. Some stakeholders suggested that the requirement for daily or twice daily inspections for birds should be required for all individual animals, including fiber animals, and housed birds but reduced to once daily for free-ranging birds. There was also a concern about the feasibility of two daily checks for all birds. Additionally, stakeholders asked for the standard to include requirements for initiating a treatment and/or monitoring frequency plan whenever abnormalities are detected in animals. Any deviation from established parameters should be treated as unexpected and warrant investigation, along with preventative action. Stakeholders also asked for a clear list of specific times during the year, such as seasonal, climatic, or other key animal management periods, when inspection frequencies should be increased. They emphasized the need for proper documentation of these inspections.

TEXTILE EXCHANGE RESPONSE:

We noted the suggestion to require twice-daily inspections for housed waterfowl and once-daily for those in other systems, along with concerns that twice-daily checks might not be feasible. However, this criterion for twice-daily checks for all birds has been successfully implemented across all down systems in RDS without problem for some time, so reducing the inspection frequency for birds not housed indoors seems unnecessary.

- a. Regarding extending this requirement to fiber animals, it's important to note that the standard requires pasture-based systems for these animals. Housing is only required when necessary for their welfare, such as during extreme weather conditions, which is not the norm. In the extensive systems required for certification, a single site may manage thousands of animals across tens of thousands of hectares. In these situations, requiring daily individual inspections for every animal on the farm in these situations is not feasible. However, the intent and clarification for monitoring fiber animals specifies that if animals are housed or penned off pasture, they must be inspected daily.
- b. Concerning proposals for a monitoring frequency plan and a list of situations when inspections should be increased, criterion 4.1.10 already includes examples such as extreme weather, birthing periods, and flystrike risk times when additional oversight is needed. The Animal Health and Welfare Plan already requires prevention and monitoring activities to be included, and other criteria in the standard require monitoring of mortality and treatment records.

2. For the animal fiber-specific criterion requiring routine inspections of animals, there is an intent and clarification point stating that while daily individual checks for animals in extensive pasture settings may not always be necessary, the certified organization is still expected to have a daily routine for checking animals. Some reviewers asked for more clarity on how this would be assessed.

TEXTILE EXCHANGE RESPONSE:

In extensive range-based systems, a daily routine for animal checks is reasonable, but it is not possible to inspect every individual animal on the very large extensive farms that are certified. The intent and clarification point two and three for this criterion (4.1.10) provide additional details on the expectations and signs that might indicate insufficient monitoring.

3. There is a requirement for routine body condition scoring (BCS) to be conducted at least twice annually, with more frequent scoring recommended. One comment suggested that housed animals should undergo BCS at least monthly once they reach adulthood, and that extensively reared animals should be scored at least quarterly and more frequently during periods of growth or other key stages in animal management,

such as prior to breeding or during pregnancy, or whenever other husbandry procedures, like hoof trimming and worming, are being undertaken.

TEXTILE EXCHANGE RESPONSE:

It was noted that monthly BCS checks for housed adult animals, and more frequently for younger animals and at least quarterly for extensive animals, exceeds current best practice guidance, which targets key points in the production cycle. Also, as noted in response to point 1, housed animals are the exception, not the norm under this standard. For extensively reared animals, the intent and clarification for this criterion (4.1.13) already indicate that assessments should be carried out by certification bodies whenever animals are handled, twice per year being the minimum requirement under the standard.

4. Regarding the BCS requirement, drafts of the standard required that action be taken (and recorded) when condition scores fell below 2.0. Some request that an action plan be implemented if BCS falls below 2.5 or exceeds 4.0 (on a scale of 1 to 5) for all animals, though others argued that BCS levels differ by species and should be context-based scores.

TEXTILE EXCHANGE RESPONSE:

Many RAF requirements, such as BCS monitoring and action for low scores, remain unchanged in the Materials Matter Standard. After reviewer feedback, the definition of low BCS was revised to include scores of 2.0 or below, rather than just below 2.0. It was not agreed that a score of 2.5 should automatically require actions beyond normal management, as this score can be expected at certain points in the production cycle. While there can be issues with overfat animals (i.e., scores above 4.0), this is generally a production issue rather than a welfare concern – for example overfat breeding animals may have difficulty becoming pregnant. In addition, a BCS of 4.0 may not be problematic meat animals, whereas a low score indicates a clear welfare issue that requires action.

Regarding the concern that BCS scoring might not be applicable across species, there is a broad agreement on acceptable BCS levels across different species (e.g., BCS 2 might be different between a sheep and an alpaca), and specific guidance is available for sheep, goats, and alpaca using this scoring system. Veterinary advice also confirmed this point.

5. A new criterion was added to assess the dirtiness of animals raised concerns among some reviewer about the objectivity of such a score and whether it is relevant for pasture-based animals.

TEXTILE EXCHANGE RESPONSE:

The introduction of the dirtiness assessment criterion aligns with the intent to have more outcomes-based criteria in the Materials Matter Standard. Dirtiness, particularly the presence of dirt plaques, gives an assessment of the long-term living conditions of animals, whether indoors or outdoors. Dirtiness (or cleanliness) already is included in other animal welfare assessment systems, such as Welfare Quality, AssureWel, and the Animal Welfare Indicator (AWIN) protocols for sheep and goats, which provide objective scoring systems. The intent and clarification for this criterion include more detailed definition of plaques and liquid dirt, with further detail to be provided in the user manual, drawing from these sources.

6. Regarding the criterion requiring humane management of animals on the certified site but outside the certification scope, some stakeholders asked for more detailed criteria to ensure that animals are allowed to express important behaviors and receive preventative care. Some suggested that all animals on the farm should be certified, while others found this expectation to assess animals not covered by the certification far too labor intensive.

TEXTILE EXCHANGE RESPONSE:

The requirement for non-certified animals on the certified site to meet health and welfare standards is not new for farms currently certified under RAF, though it has now been expanded to cover down producers too. The intent and clarification section shows that the auditor is not expected to conduct a full welfare assessment for all non-certified animals on the site. Instead, this criterion allows the auditor to raise a non-conformance if welfare issues are observed in non-certified animals. The expectations for non-certified animals are also included in the intent and clarification section and have been amended in response to reviewer comments. Regarding the suggestion that all animals on the farm must be certified, these standards only cover a small number of species, so this is not a viable option. The reviewer may not have realized that this criterion specifically addresses animals of a non-certified species (e.g., cattle present on a certified sheep farm). All animals of the certified species must already be covered by certification, as per the prohibition on parallel production in criterion 1.1.9.

Disease and treatment

1. Stakeholders suggested that epidemic disease management, as noted as a factor in certified sites' emergency plans, should be incorporated into the biosecurity plan. Reviewers argue that good biosecurity measures should prevent diseases from entering properties in the first place, typically through the introduction of new animals.

TEXTILE EXCHANGE RESPONSE:

The purpose of this plan is to manage various emergencies, including epidemic disease. While individual certified organization can integrate their emergency plan into their broader animal health and welfare plan and link it to their biosecurity section, it does not eliminate the need to recognize epidemic disease as a potential emergency risk. Epidemic disease is just one example of what could be included. It's also important to note that epidemic diseases can be introduced by means other than bringing in new animals. There are many instances of wildlife-livestock interactions (with wildlife including insects, birds, and mammals) causing disease, as well as diseases like Foot and Mouth, which have airborne transmission. Additionally, disease can spread from livestock to livestock.

2. Some stakeholders requested that the down/waterfowl-specific requirements for foot dips at farm entrances and the provision of personal protective equipment (PPE) for visitors, when necessary, be extended to animal fiber farms. Reviewers felt that requiring foot dips for all farms was a simple and effective measure.

TEXTILE EXCHANGE RESPONSE:

The down criteria apply to housed systems for ducks and geese, where birds are kept in controlled environments, and a key risk of disease transmission is from workers or vehicles moving between flocks or farms. Housed systems generally have a single entrance point to each building. For animal fiber production, the standards require extensive pasture-based systems, which have a different risk profile and a larger number of potential access points to the farm and livestock. While the Health and Welfare Plan for animal fiber farms must include disease prevention, and restricted access, vehicle and foot disinfection, and PPE may be appropriate during disease outbreak or in specific regions, these measures are generally not needed and would be difficult to implement on most farms.

3. Some stakeholders believe certain chemicals, such as organophosphates and cypermethrin, should not be used for dipping animals and should be excluded from the standard. Additionally, some feedback objected to the full dipping of fiber animals entirely, while others requested more detailed guidance on best practices for protecting animals during dipping.

TEXTILE EXCHANGE RESPONSE:

Concerns about dipping is conducted to protect animal welfare were initially addressed in the intent and clarification section but have now been included within the requirements of this criterion (4.1.22). The intent and clarification for this criterion include additional guidance. While the request to ban certain chemicals has been noted, in some countries these might be the only options available for controlling specific external parasites. This standard does not define organic production, where chemical use is restricted or prohibited. Banning any legally permitted veterinary medicines, including the chemicals mentioned, is outside the scope and intent of this standard.

4. Stakeholders asked that records of treatments, treatment plans, medicines administered on the farm, the person administering medication, and relevant withholding times be recorded.

TEXTILE EXCHANGE RESPONSE:

Treatment records were already a requirement of RDS but only a recommendation under RAF. In this standard, treatment records must include details such as the product used, the reason for treatment, the animals treated, the date of treatment, and the withdrawal period, as outlined in the conformance criterion (4.1.24).

Animal nutrition

Regarding provision of feed:

1. Stakeholders suggested that the specific topic of changing climate patterns should be addressed in the emergency plan rather than in the nutrition plan.

TEXTILE EXCHANGE RESPONSE:

The suggestion was made to address how changing climate patterns impact feed and nutrition within the emergency plan instead of the nutrition plan. While emergencies affecting feed availability should indeed be covered in the emergency plan, this criterion is meant to encourage farmers to consider the impact of changing climate patterns on the regular management of feed production, not just in emergencies. The intent is to acknowledge that some climate changes are becoming the norm rather than exceptions. For instance, droughts that occur four years out of five should be planned for as part of day-to-day operations, rather than being treated as emergencies just because they only occurred one year out of ten in the past.

2. For animal fiber production, there was a request to include a requirement for ad libitum access to forage.

TEXTILE EXCHANGE RESPONSE:

The criterion addressing adequate nutrition for fiber animals does not specifically mandate ad libitum forage. However, the criterion and its associated intent and clarification points already ensure that nutrition must be forage-based and that the daily provision of forage must be sufficient to prevent negative outcomes.

3. There were questions about why certain feed-related criteria apply specifically to down production and not to animal fibers – such as provisions for meeting nutritional needs, providing continuous access to feed during daylight hours, and ensuring sufficient space at feeders to prevent competition.

TEXTILE EXCHANGE RESPONSE:

The suggestion to include fiber animals under the specific down criterion on meeting nutritional animal needs is already addressed by a separate criterion focused on forage-based nutrition for fiber animals (see also point 2). Continuous access to feed during the daytime is less relevant for fiber animals because the standard defines a pasture-based extensive system, where feeding cannot be switched on and off. In contrast, most waterfowl rely on human intervention for their feed, making this criterion particularly relevant to them. Similarly, the criterion on feed trough space is specific to waterfowl because they depend on feeders for their health and nutrition, whereas fiber animals primarily rely on extensive grazing.

4. Stakeholders requested that the intent and clarification for the prohibition on force-feeding be amended to clearly indicate that this practice is never acceptable. Some also asked for this requirement to be extended to parent and grandparent flocks supplying hatchlings for down and be harvested when they are slaughtered.

TEXTILE EXCHANGE RESPONSE:

The intent and clarification for this criterion (4.2.8) were revised as requested. Regarding the extension of the prohibition on force-feeding to grandparent stock, it's important to note that if feathers or down from grandparent or parent flocks were included for certification, all requirements of this standard, including the prohibition on force-feeding, would apply. However, if grandparent stocks are not producing feathers for certified supply chains, it is challenging to include them in certification. Often, grandparent stocks are managed by different companies than overseeing parent flocks and meat birds. The possibility of reviewing practices like force-feeding on parent flock farms not producing certified down is being reviewed as part of the revision of the certification procedures accompanying the Materials Matter Standard.

5. For down production, stakeholders requested clear guidance on the leadership criterion regarding the use of soy in waterfowl feed, specifically ensuring that it is not sourced from countries with a high risk of deforestation to create the cropland. Some reviewers also suggested extending this criterion to animal fibers.

TEXTILE EXCHANGE RESPONSE:

Additional guidance on meeting this leadership criterion will be included in the user manual. It's important to note that this is a leadership criterion – meaning it is mandatory for certification to be granted. Regarding the suggestion to extend this criterion to mammals, this was discussed with the International Working Group for the Materials Matter Standard as part of early deliberations on how to incorporate climate outcomes for down. For mammals, other factors, such as soil health, soil carbon, and grazing management, have a more significant impact, particularly since mammals certified under this standard are raised in extensive pasture-based systems. While the use of soy in mammal feed is not ruled out, it is a more pressing issue for waterfowl.

6. One stakeholder requested confirmation that growth promoters are not used, as the original intent and clarification seemed to imply that antibiotics could be used for growth promotion without the presence of a disease or justified use.

TEXTILE EXCHANGE RESPONSE:

The intent and clarification section was revised to clarify this criterion as requested.

Regarding the provision of water:

1. The intent and clarification section for the criterion regarding water provision states that when continuous access to water is not possible – for example, in some herding

systems – animals must be able to drink their fill at least twice per day. This requirement specifically applies to animal fibers production, whereas waterfowl must always have continuous access to drinking water. Stakeholders proposed increasing the required water to at least three times per day.

TEXTILE EXCHANGE RESPONSE:

The practice in herding systems with restricted water access typically involves providing water in the morning, after which the animals are taken out to graze, and then returning them to water in the evening. Introducing a third watering session would require additional movement time, which would reduce time available for grazing. The criterion already specifies “at least twice”, meaning some herders may offer water more regularly. However, in response to the stakeholder feedback, the intent and clarification section has been updated to emphasize that the twice-daily water provision should occur in the morning and evening, rather than twice within a short span. Additionally, it has been clarified that this exception applies solely to fiber animals, with waterfowl still requiring continuous access to water.

2. The discussion around the extension of the maximum time off water for ewes and does in late pregnancy from eight hours (as stipulated in the Responsible Wool Standard (RWS) and Responsible Mohair Standard (RMS)) to 20 hours generated significant debate. Concerns were raised about the risk of pregnancy toxemia and potential death in ewes and lambs after four to eight hours without feed or water. Some stakeholders suggested that the maximum time off food and water should be limited to four hours for ewes and this should not occur when they are less than 40% into their gestation period to maintain animal welfare. They further argued that food or water deprivation should only be done under veterinary advice and for specific treatments. Other stakeholders disagreed, noting that, due to the potential impact on animal health and animal production, growers are acutely aware of the needs of late-pregnancy and lactating ewes when handling them and carefully monitor them during period of water restriction, such as shearing, to ensure animal welfare. Checks should be made on stock during yarding and shearing to ensure they are comfortable and not experiencing any health issues.

TEXTILE EXCHANGE RESPONSE:

The extension to a 20-hour maximum reflects the calibration currently in place under the RWS and RMS standards. This change was made because the practicalities of meeting the existing eight-hour limit were causing significant issues in the field, and the limit also contradicted best practice guidelines for pre-shearing management in some regions. Despite concerns about potential risks to ewe, does, and unborn offspring, a review of outcomes under the current calibration did not indicate significant problem. Pregnancy toxemia has been highlighted in the intent and clarification for criterion 4.2.15 as an example of an adverse effect. The standard also includes a requirement for ongoing monitoring of animals undergoing feed and water deprivation to detect any signs of distress, with immediate remedial action required if necessary. It's important to note that sheep and goats are generally removed from water as a group before procedures like shearing, and the 20-hour maximum is counted from the time the group is first removed from water until the last animal in the group is sheared and returned to water. This means that many animals in the group will experience water restriction for a much shorter duration.

Living environment

We received feedback regarding the general living environment for all species:

1. Reviewers questioned certain criteria in the living environment section that are specific to down production were not also applied to fiber animals.

TEXTILE EXCHANGE RESPONSE:

In cases where reviewers asked about the exclusion of animal fibers from down-specific criteria, there are often separate criteria established for animal fibers (e.g., the criterion on thermal comfort). Other criteria in this section recognize the significant differences in production systems between down and animal fibers. For example, detailed requirements concerning housing are only applicable to down production because the standard requires pasture-based production for fiber animals, where such housing conditions are not relevant.

2. There is a criterion in this section that requires all animals to be protected from the risk of predators. Reviewers requested more detailed guidance on methods to control predators.

TEXTILE EXCHANGE RESPONSE:

Methods to control predators are covered under the biodiversity theme in the Land Use section of the standard.

3. Stakeholders suggested that because humans are less sensitive to detecting ammonia levels, these should be routinely monitored and recorded. They recommended that if levels exceed 8ppm, immediate intervention should be required, and ammonia should not routinely exceed 10ppm.

TEXTILE EXCHANGE RESPONSE:

The RDS previously recommended that there should not be a strong ammonia smell in animal housing. This is now combined with a conformance requirement on good ventilation, also featured in the RAF standard in the Materials Matter Standard. The intent and clarification section provides guidance on acceptable ammonia and dust levels in housing. Research suggests that maintaining ammonia within the 10-20 ppm level is a good target for livestock housing, and the human nose can typically detect ammonia at around these levels.

4. Space allowances, which were previously undefined for individual birds in RDS and recommended for animal fibers, have now become a requirement. Some stakeholders questioned the space requirements, with some requesting that all animals be able to lie down at the same time and/or that space allowances align with European Organic regulations.

TEXTILE EXCHANGE RESPONSE:

Stakeholders also requested that space allowances for waterfowl ensure that birds can stretch their wings and rise to their full height. This is covered by the separate criterion on freedom of movement (4.3.24). Specifically for ducks, there was a proposal to set a maximum stocking rate of 21kg/m², in line with EU organic regulations. However, the Materials Matter Standard allows for higher stocking density for larger ducks, and the standard does not seek to replicate all organic requirements.

- a. For geese, a similar maximum stocking density of 21kg/m² was proposed. Given that intensively reared geese are slaughtered at around 5kg per bird at less than 13 weeks of age, and less intensive birds at 6-7kg at over 13 weeks, the current criterion allows for more space than the proposed 21 kg/m², so no changes were made. For fiber animals, there was a request in the bedding criteria to ensure that all animals could lie down simultaneously. This is covered by the required stocking densities. Concerns were raised that the required area per sheep and goat has been increased from the recommendations in the current RWS and RMS. The current RWS and RMS have an error in the conversion from square feet to square meters. The square footage per animal is correct and converts to the square meterage shown in the Materials Matter Standard. The reviewer is correct that the square meterage shown in the RWS and RMS is currently lower, but this is an incorrect figure. Most feedback from farmers indicates that it is rare for fiber animals to be housed for more than 24 hours, so this criterion would in any case impact only a small number of growers and only if their stocking rates in housing are limited to the RWS and RMS metric figures. For alpacas, there was a request to increase the area provided, but no reference was given for the proposed increase. The alpaca-specific criterion has been changed from recommended in RAS to required in this standard.

Feedback was also submitted specifically on the living environment for fiber animals:

1. Long-term close confinement and tethering are prohibited, as they are in the RAF standards. However, reviewers asked for more specific limits on when shorter-term restrictions on animal movement might be acceptable and that records be kept of any instances of this occurring.

TEXTILE EXCHANGE RESPONSE:

The intent and clarification for this criterion already limits close confinement and tethering to situations when there is no alternative option to manage the animal, and organizations would need to describe these situations during audits. Examples of different operations and lengths of time when animals would be in close confinement or tethered are also already included here. Given that the certified farms involved are generally low-risk in this regard, there should be no need for additional record-keeping, especially considering concerns about the already extensive paperwork required.

2. The provision of raised platforms as environmental enrichment for goats housed for more than 48 hours is recommended in the RMS and remains a recommendation (leadership criterion) in the Materials Matter Standard. Some questioned the validity of this recommendation, while others requested it be made a requirement of certification on the grounds that it is already required by European regulation.

TEXTILE EXCHANGE RESPONSE:

There was a request to make this leadership criterion a conformance requirement. Housing for goats is relatively rare in the systems covered by the Materials Matter Standard, which must be based on extensive, range, and pasture-based production. If housing were common, it would be more important to require this and expect certified farmers to ensure all housing areas provide raised platforms. As housing for more than 48 hours is rare, highlighting this as a leadership criterion is considered sufficient.

- a. A further comment stated that this must be required as the European Food Standards Agency (EFSA) and other standards aimed at food animal production require this. It's important to clarify that EFSA is not a food standard but a body that provides recommendations to the EU. A search of other standards aimed at food production found only one relatively small certification which requiring raised platforms for housed goats.

3. The critical requirement that fiber animals are raised in pasture-based systems includes examples in the intent and clarification where removal from pasture could be acceptable. Reviewers requested that this list be extended.

TEXTILE EXCHANGE RESPONSE:

Additional examples requested for inclusion on the list of acceptable reasons for removing animals from pasture included drought, prussic acid poisoning, bloat, clostridium disease outbreaks, and parasite-contaminated pastures. Except for drought, these are primarily impacts of land management and the number of animals present, as well as the available vegetation. While a disease outbreak would require immediate veterinary treatment, which might include temporary removing individuals from pasture, the intent of this standard is that land management should prevent such conditions. Therefore, it would not be appropriate to add these to a list of reasons for general herd or flock exclusion from pasture.

4. Reviewers requested more details identifying when the requirement for effective shelter and protection against thermal discomfort is not being met.

TEXTILE EXCHANGE RESPONSE:

The intent and clarification for this criterion already included signs of heat and cold stress. Based on reviewer suggestions, this was further amended with additional details.

5. There was a request to define acceptable intervals for fencing and infrastructure inspection and maintenance within the standard.

TEXTILE EXCHANGE RESPONSE:

The frequency of inspection will naturally vary depending on the size and type of the property. Therefore, instead of setting inspection intervals, the key is that the infrastructure and fencing are well maintained. This will be the focus of assessment during audits, ensuring flexibility while still upholding high standards.

Finally, there was feedback specific to the living environment for down production/waterfowl:

1. Regarding the waterfowl outdoor access requirement, stakeholders raised concerns about scenarios where flocks are not slaughtered until after 42 days of age – the point at which outdoor access is required in the standard. Additionally, some stakeholders suggested lowering the age at which birds must be given outdoor access from the current 42 days.

TEXTILE EXCHANGE RESPONSE:

The minor criterion that mandates all waterfowl have access to an outdoor area at six weeks of age has been amended to apply specifically to birds raised for meat, excluding parent birds and breeding flocks.

A new intent and clarification point was added stating that when the certified organization can show that the expected age of slaughter is 42 days of age or less, and exceeding this age occurs only due to unforeseen circumstances, such as slaughter facility breakdown and extreme weather that precludes the transport of birds or similar, outdoor access need not be provided for individual flocks affected until they reach 49 days of age. This should be sufficient to resolve these operational issues.

- a. Regarding the suggestion to allow earlier outdoor access when conditions allow: While the standard allows for earlier access, the maximum age for mandatory outdoor access remains set for clarity in auditing processes.

2. Some stakeholders requested moving criterion 4.3.41 in the second draft (requiring at least 50% of outdoor space be covered with vegetation) from a leadership recommendation to a conformance requirement, while others deemed this unfeasible.

TEXTILE EXCHANGE RESPONSE:

It is recognized that the European free-range chicken and egg marketing regulations already require at least 50% vegetation in outdoor areas, but for many regions outside Europe, even providing outdoor access represents significant progress from standard practice. Additionally, other reviewers pointed out the difficulty of retaining vegetation coverage with ducks and geese compared to other poultry species. Given these opposing views, the requirement for vegetation in outdoor areas (where these are required) has been retained as a leadership criterion.

3. Concerns were raised about the shift from the current requirement of eight hours of darkness in within every 24-hour period in the RDS to six continuous hours of darkness with half-hour dusk and dawn periods in draft v1 and v2 of the Materials Matter Standard. Reviewers noted that eight hours minimum of darkness is necessary for health and welfare purposes and that six hours dark is not permitted by other standards and poultry codes. Further reviewers suggested that, as they believed all RDS farms currently met the eight-hour darkness requirement, there was no need to lower the requirement for the Materials Matter Standard.

TEXTILE EXCHANGE RESPONSE:

It was initially believed that all certified farms met the eight-hour darkness requirements; however, this was not the case. The shift to six hours of darkness was proposed because several farm groups, primarily those producing meat, requested this calibration, citing that extending darkness to eight hours would hinder certification. Contrary to some comments, six hours of darkness is permitted by other standards, particularly those applicable to meat production. Unlike chickens and turkeys, where research supports a minimum of eight hours of darkness per night, there is less clarity regarding ducks and geese. Following further draft feedback and additional research, the standard has been amended to require at least seven continuous hours of darkness, along with 30 minutes of dawn and dusk, resulting in a total of eight hours sleep time. This amendment will be carried forward into the pilot phases.

4. There was a suggestion to elevate the leadership criterion, requiring that birds have access to water deep enough to swim in, to a conformance requirement. However, conflicting concerns were raised regarding avian influenza and the physical space needed for swimming ponds in current production systems.

TEXTILE EXCHANGE RESPONSE:

Due to the varied response received and the recognition that providing water deep enough for birds to swim is a significant advancement from current practices – which could result in the majority of currently certified organizations dropping certification – this criterion remains a recommendation. However, the minor conformance criterion from the RDS, which requires that waterfowl have access to water deep enough to dip their heads and preen, has been upgraded to a major criterion. This ensures that birds' behavioral needs are met without imposing stringent requirements that could hinder certification.

Husbandry procedures

Reviewers had feedback regarding general husbandry procedures for fiber animals:

1. Some stakeholders felt that painful husbandry procedures should only be performed by veterinarians and that tail docking for sheep and ear notching for all animals should be banned. They noted that “many” sheep flocks do not use tail docking. Conversely, other reviewers supported tail docking in some situations but suggested that certified organizations should demonstrate that it is strictly necessary. They also recommended reducing the area removed by ear notching from the current maximum of 10%.

TEXTILE EXCHANGE RESPONSE:

The current RAF standards require trained and competent workers. The Materials Matter Standard includes a single critical-level criterion (4.1.11) in the animal welfare section stating that all workers must be knowledgeable and demonstrate competency in animal handling animals and capable of maintaining animal health and welfare, including performing husbandry procedures, euthanasia, and on-farm slaughter that meet the requirements of the standard. Competency includes understanding when to involve a veterinarian. The husbandry procedures that are permitted by the standard are commonly carried out by trained and competent workers using the same techniques as a veterinarian would. Additionally, given the costs and practicality issues of requiring a veterinarian for routine procedures, the standard allows trained and competent workers to perform these tasks. Regarding the ban on tail docking, this is not being taken forward as a change because:

- a. Procedures causing harm are permitted only if they are justified by a risk/benefit analysis that shows improved welfare (see 4.4.4 and 4.4.5).
- b. One key requirement of this standard for sheep production is a ban on mulesing (4.4.19), which is crucial. While mulesing and tail docking are both used for fly strike control, alternatives for fly management are available but not as effective in eliminating the need for tail docking.
- c. Prohibiting tail docking would create significant barriers to certification. Contrary to claims that "many" farms run non-tailed docked sheep, these sheep are rare in the wool sector. There is not currently easy access to sheep that genetically do not need to be tail docked and prohibiting tail docking would vastly restrict the scope of this standard. All the other benefits of having sheep under a third party audited standard covering not only all other facets of animal welfare, but also environmental management and social responsibility, would therefore be lost.
- d. The standard aims to maximize animal welfare by ensuring that the majority of animals are managed in a way that promotes good welfare outcomes. The overall benefit to animal welfare is considered greater with the current approach than with a total ban. The requirement for determining if tail docking is necessary is addressed by the welfare risk/benefit assessment outlined in 4.4.4 and 4.4.5. Regarding ear notching, the current restriction to a maximum of 10% removal remains justified. Ear notching is already restricted to situations where tagging alone is inadequate for identification. Multiple notches are often needed to identify different farms, especially when used to prevent theft. The 10% limit strikes a balance, allowing effective identification while preventing excessive cutting, which can be found in some regions, where up to one-third of an ear might be removed.

2. Where tail docking of sheep takes place, some questioned the length of tail required by the standard – to cover the vulva in ewes and a similar length in rams – and whether docking sheep’s tails to a shorter length really gave rise to welfare problems such that this was unacceptable. Others queried the intent and clarification around purchase of replacement breeding stock from non-certified sites that may have tails docked shorter than permitted by the standard and whether wool from such animals could be included as certified (with reference to mulesing, where mulesed wool can never be marketed as certified even if exceptional allowances to purchase mulesed breeding stock are granted).

TEXTILE EXCHANGE RESPONSE:

The standard requires tail lengths remaining after docking sheep to match current RAF guidelines and industry recommendations from different countries. Shorter docked tails are linked to welfare problems, like prolapse in ewes and perineal cancers.

- a. When it comes to the intent and clarification allowing the purchase of short, docked breeding stock and whether the same approach should be taken as with mulesed sheep (i.e., the wool could not be marketed as certified). Mulesing is a critical issue so does and should trigger the need to separate wool. One of the key claims for RWS (and the Materials Matter Standard) is that wool comes from non-mulesed sheep. Tail docking is a major welfare issue, but not in the same way as mulesing. Therefore, the purchase of a short tail docked ram should not on its own lead to a need to separate the wool.

3. Allowed methods and maximum ages for castration of sheep and goats and tail docking for sheep were also questioned. Concerns were raised about the use of rubber rings and burdizzo (bloodless emasculator) and whether the maximum eight-week average group age for all castration and tail docking for sheep and castration other than by burdizzo for goats should be a maximum individual age for each animal that undergoes these procedures. Further comment stated that it was “industry practice” to carry out castration by two weeks of age, so the eight weeks average permitted in the standard was questioned. The legality of some methods in some regions was also questioned with scalpel cited as not being legal for husbandry procedures in some places. For alpaca, there were questions about permitted methods, with several comments that it is rare in any case for castration to take place. One stakeholder also commented that vasectomy of male alpacas may be used, although this is not included in the standard.

TEXTILE EXCHANGE RESPONSE:

No reference is provided to justify that rubber rings and burdizzo should not be used, and in some research, rubber rings are identified as the least painful option, and conversely, scalpel proposed by the reviewer is a greater cause of complications and stress.

- a. When it comes to methods, queries were raised about the mandatory use of pain relief when a scalpel is used for castration with requests to amend the intent and clarification to be clear that, without pain relief, castration using a scalpel cannot take place. Review of the intent and clarification shows this is already clearly stated.
 - b. When it comes to age, comments from one region suggested that eight weeks should be the absolute maximum individual age for castration and tail docking (rather than the maximum average age of a group of lambs or kids). Comments from another region stated that carrying out procedures by eight weeks of age required additional gathering of lambs that was detrimental to the youngest animals and could lead to mismothering. The comment that "industry practice is to do this within two weeks of age" does not align with feedback from industry or certified growers where rubber rings are sometimes utilized at 14 weeks. Although castration at this age would not be permitted by the standard, it makes the point that two weeks or less is not industry practice aside from some regions in Europe where very different systems of sheep management are practiced.
 - c. Regarding the comment that rings and burdizzo should not be permitted for alpaca castration, this is already covered in 4.4.10. where only surgical castration with mandatory pain relief is permitted. Further comments included that pain relief must be used for alpaca castration unless it is illegal. As there is not currently a legal avenue for alpaca farmers to access pain relief, this would be a weakening of 4.4.10 which would not allow castration unless pain relief was used. The question of vasectomy that was raised by one reviewer was researched further and no evidence was found that this is a routine procedure.
 - d. Regarding the comment that the use of a scalpel is illegal in some regions., the inclusion of an option in this standard does not mean that illegal actions can be taken. The farmer must meet all legal requirements in their region. However, as this practice is legal in other regions it is still relevant to include it here.
4. The continued prohibition on mulesing was positively commented on as an important issue by some stakeholders. There were questions about the presence of mulesed sheep on certified farms, recognizing that farms that ceased mulesing may have previously done so.

TEXTILE EXCHANGE RESPONSE:

The standard clarifies the definition of mulesing and recognizes that, if farms have recently ceased mulesing, they may have animals that were mulesed in the past. Sheep may be part of a commercial flock for many years and it is not reasonable to require farms to wait until all previously mulesed sheep have reached the end of their lives or that all previously mulesed sheep are culled from the flock prior to seeking certification. However, the intent and clarification for 4.4.19 makes clear that, although it is accepted that some mulesed animals may be present on a certified farm, the wool from the mulesed animals must be separated from that of non-mulesed animals and cannot be marketed as certified.

5. Reviewers commented on the requirements for the teeth of alpaca to be checked regularly and rasped or trimmed as needed (4.4.32). Some called for some dental practices to only be carried out by a veterinarian and others that this criterion should specify that only trained individuals carry out tooth management. Further stakeholder requested that pain relief be made mandatory when the sensitive pulp of the tooth is exposed and that alpaca teeth must be checked at least twice per year.

TEXTILE EXCHANGE RESPONSE:

As per other animal husbandry operations, this can be carried out by someone trained and competent to do so (see additional detail on this in the answer to point 1 above).

- a. When it comes to pain relief for dental procedures that expose the sensitive pulp of the tooth, the intent and clarification makes clear that this is not permitted.
- b. Moving on to the suggestion that it is mandated that alpacas' teeth are checked twice per year, the criterion already requires that checks are frequent enough to ensure no animals are seen with teeth problems. This specificity is hence not needed. Information gathered while developing the RAS suggested that at least one annual check was sufficient.

Regarding pain relief requirements for fiber animals:

1. A lot of comments were raised around pain relief through both drafts of the Material Matters Standard. There were several options on how to move forward. The first option retains the current RAF requirement that pain relief is used when suitable pain relief is available to farmers. The second option recognizes that pain relief for fiber animals is currently only available for sheep in a very small number of countries, and therefore, suggests making this a recommendation for use in the standard or strengthening the requirement for pain relief further and only allowing painful husbandry procedures when pain relief is used. Comments were received across all options. Questions were also raised about the definition of "available" pain relief and

concerns arose about how auditors would determine this, as well as determining whether products were used when they were available.

TEXTILE EXCHANGE RESPONSE:

The clarification on the definition of "available" are covered in the standard and there will be updated tables of products available in different countries for both farmers and auditors (these are currently shown in the RAF user manuals). An additional intent and clarification point was added to show the expectation for evidence of purchase and use of pain relief when it is available.

- a. As noted above, the responses from stakeholders covered all possible options for pain relief, but most people were in favor of retaining a requirement for use when products are available. No change has therefore been proposed from the current situation in RAF. Pain relief must be used for painful husbandry procedures when suitable products are available for farmer use. See 4.4.6 for more details.

2. Commentators from Australia and New Zealand, where pain relief is currently available for sheep, were particularly concerned about the disparity between their requirements and costs for certification compared with other key production regions where pain relief is not available. Suggestions include seeking formal recognition through scope certificates when pain relief is used or adopting a tiered system where those using pain relief could be certified to a higher tier of the standard.

TEXTILE EXCHANGE RESPONSE:

The cost difference for farmers in regions where pain relief for sheep is licensed for versus regions where such products are unavailable is acknowledged. We were heartened that several respondents who raised this point did not request exemptions from using pain relief, recognizing its importance for animal welfare. Instead, they suggested better recognition for farms that use pain relief. This could potentially be indicated on a certified farm group's or individual's Scope Certificate, a suggestion currently under review as part of the broader certification updated accompanying the Materials Matter Standard roll-out.

3. Stakeholders suggested that multi-modal pain relief, such as an anesthetic plus an analgesic, should be required where both options are available. Additionally, there was a request to change the current requirement for use of pain relief from "if available" to "if legal".

TEXTILE EXCHANGE RESPONSE:

Currently, farmers using pain relief are already disadvantaged, bearing additional costs that certified farmers in other countries without access to pain relief do not face. Requiring the use of two types of pain relief would further widen this gap. However, since this is considered best practice, a new leadership criterion (4.4.7) now recommends using both local anesthetic and analgesia when both are available.

- a. The change from "if available" to "if legal" has not been made as this would require that only a licensed product administered by a veterinarian be used by certified farmers and this would be cost-prohibitive.

4. Some stakeholders suggested that the requirements around pain relief should link to the age of the animal. This way, animals castrated or tail docked at less than four weeks of age do not need to be given pain relief, whereas animals above this age should be given pain relieving medication.

TEXTILE EXCHANGE RESPONSE:

The suggestion to link pain relief requirements to the age of castration or tail docking has not been adopted. The idea that animals castrated under four weeks of age don't need pain relief, while older animals do, implies minimal pain for younger animals – a notion contradicted by recent research. In addition, several farmers noted that enforcing a four-week maximum for castration in regions where no pain relief was available would be counterproductive and could lead to mismothering.

5. Stakeholders asked for individual farmers and farm groups to start using pain relief when these products are newly introduced into a country.

TEXTILE EXCHANGE RESPONSE:

A new intent and clarification point has been added to clearly outline the expectation and timelines for implementation of the use of pain relief when this is newly licensed in a country. Particularly with farm group certification, it is not reasonable to expect all farmers in a group to start using a new product as soon as it is licensed as training and technical support will be required.

6. Concerns arose regarding pain relief that does not completely mitigate the pain felt by the animal, as in tail docking for sheep, and therefore, should not be required.

TEXTILE EXCHANGE RESPONSE:

Current solutions are not perfect but it cannot be argued that tail docking is a painful procedure and that pain relief has some benefits, even if it is not fully mitigating the pain. Other reviewers are strongly in favor of retaining pain relief requirements, so no amendment has been made.

7. Additional comments were received asking us to align our pain relief criteria with different campaigns and comments from NGOs and Stakeholders.

TEXTILE EXCHANGE RESPONSE:

This comment doesn't provide specific examples of misalignment. Stakeholders don't speak with a single voice and their views on pain relief vary and sometimes conflict. While some animal welfare NGOs advocate for mandatory pain relief in all situations, Textile Exchange cannot enforce this due to the lack of pain relief products in some regions. The proposed solution from these stakeholders that veterinarians should administer off-label pain relief to all animals is impractical, as discussed in the response to comments about veterinarians reviewing all Health and Welfare Plans in the relevant section above.

We also received commentary on husbandry procedures for down production, specifically live plucking:

A stakeholder asked that the prohibition on live plucking for waterfowl be extended to include the parent stock or even grandparent stock. They suggested that an audited absence of live plucking at these levels should be reflected on transaction certificates and/or scope certificates.

TEXTILE EXCHANGE RESPONSE:

Where parent or grandparent flocks supply certified feathers or down, they are already subject to this criterion and must undergo fully audits to meet standard requirements. For parent or grandparent flocks that supply eggs or hatchlings but do not contribute directly to certified down and feathers, there is currently a voluntary certification module within RDS that brands can request their suppliers to adhere to. As part of the Materials Matter Standard, we are evaluating the feasibility of including a requirement for parent flock identification and auditing, particularly concerning live plucking. Parent flocks live longer than meat birds and are therefore more at risk of this activity. However, a more comprehensive understanding of the full duck and goose supply chain in key down production countries is needed before determining the achievability of including parent flocks in these standards. Discussions on this point are ongoing as part of the piloting process taking place in 2024.

Animal shearing

There was substantial reviewer commentary on animal shearing requirements:

1. Stakeholders asked that all animal handling and care procedures at shearing explicitly require trained individuals and that the term “gentle” be added to the current requirement for calm and confident handling. A further suggestion was made that attendance at courses on low-stress livestock handling should be added as a leadership criterion.

TEXTILE EXCHANGE RESPONSE:

Elsewhere in the standard there is a requirement for positive handling techniques and some challenges were raised by reviewers on how this could be defined and audited (see Handling and Transport section for more details). A similar challenge applies to the term “gentle”. When it comes to low-stress livestock handling courses, this has been added to the intent and clarification for the positive handling criteria (4.8.2). However, for this criterion, shearing is more likely carried out by contractors. While this standard requires contractors to be competent, it goes beyond scope to require or recommend that contract organizations put all their staff through low-stress handling courses.

2. Alpacas are generally restrained with ropes at shearing. Some stakeholders asked to stop this practice or advocated for alternatives like soft rope, slings or chutes. More details on situations where alpacas must be released from restraint at shearing was also requested.

TEXTILE EXCHANGE RESPONSE:

Stopping the use of ropes to restrain alpacas would be a major shift in current practice and a likely barrier for certification. The animal would still need to be restrained even with slings and chutes, making the welfare benefit questionable. Soft ropes are already a requirement of 4.5.10 and the intent and clarification for this criterion covers attachment to not restrict blood flow. The intent and clarification for 4.5.12, which covers the release of alpacas that might otherwise injure themselves, have been amended with more details in response to the comments raised.

3. Stakeholders requested clarification on the definition of serious injuries that require immediate treatment. Some felt that the current RAF requirement, now included in the Materials Matter Standard, which defines a serious wound, was too restrictive. They argued that the standard should also mandate treatment for smaller injuries.

TEXTILE EXCHANGE RESPONSE:

The definition of a serious wound in the RAF and Materials Matter Standard drafts specifies that a wound must be greater than 10 cm in length OR at a depth reaching the muscle layer to require immediate treatment. Examples include the removal of teats in ewes, damage to the prepuce, and removal the vulva tip. Some reviewers misunderstood this, interpreting it as a wound needing 10cm in length and deep enough to reach the muscle layer. To address this, the planning version of the Materials Matter Standard updated the intent and clarification for criterion 4.5.16. The length threshold for treatment was reduced to 6cm, and additional guidance was provided on assessing the location, depth, and length of injuries to determine their severity.

4. Some stakeholders suggested that thresholds for action should be included when recurring problems with handling or injuries occur.

TEXTILE EXCHANGE RESPONSE:

There was a request to set thresholds for injuries or poor handling during shearing, but no specific suggestions were provided. This is challenging to set as there could be different acceptable limits depending on the shearing method (hand shears vs. mechanical) and the thresholds for total injuries versus number of injuries from any individual shearer will be different as well as the component of time. For example, a shearer causing multiple injuries in quick succession differs from one causing a similar number of injuries over a much greater number of sheep. Our review of RWS data shows that shearing injuries are generally at minimal, and farmers are proactive in addressing any concerns they observe. Given the lack of a clear threshold, no changes were made to criterion 4.5.18 and its intent and clarification on this point.

Herd management

Feedback regarding herd management includes the following:

1. Stakeholders asked for the requirement to avoid mixing certified animals to be reconsidered, with some noting that mixing sheep and goats is part of effective land management since they graze differently. Suggestions were made to change this from a minor point to a recommendation.

TEXTILE EXCHANGE RESPONSE:

This criterion was greatly misunderstood and the amendments to the intent and clarification after draft V1 did not resolve it. Further clarifications were made to draft V2 to show that this criterion does not prohibit farmers from mixing different species of animals for their grazing management, but rather concerns mixing groups of certified animals together. By doing this, the stable structure of the group and order of dominance is disturbed, which can lead to aggression. The requests to make this a leadership criterion comes from a misunderstanding.

2. There was a suggestion that the leadership criterion recommending brought-in animals to be quarantined be made into a conformance-level criterion.

TEXTILE EXCHANGE RESPONSE:

The request that quarantine is conformance-related was not taken up. The certified organization already needs to cover biosecurity in their health and welfare plan, but quarantine may not be necessary in every instance – for example, when farms always buy replacement breeding stock from the same source with a known disease risk.

Breeding, birthing, and caring for young animals

Reviewers commented on breeding and birthing planning and breeding techniques:

1. Comments were received around the selection of stock for breeding with proposals that breeding sheep for short tails was added to the list of breeding stock selection criteria.

TEXTILE EXCHANGE RESPONSE:

This standard does not prohibit tail docking when it can be justified by an overall welfare benefit and there are limited genetic sources for shorter tailed sheep. Additionally, some farms may have longer tailed sheep because their environment and climate means they do not need to tail dock. It is therefore not reasonable to require all certified farms to breed for short tails. If farmers have a goal of breeding shorter tailed sheep this could be part of the requirement to assess animal conformation as described in the intent and clarification for this criterion.

- a. There was a comment about breeds of sheep with inherently poor mothering ability and an expectation that breeding strategy should include better mothering as well as ease of birthing, as these are interlinked. This is best dealt with in the additional user manual guidance on breeding and birthing, where it can be acknowledged that there are multiple factors that can impact on maternal ability.

2. Further details were requested on the management of animals during birthing time and the level of supervision that should be expected. It was questioned whether planning for birthing should be moved to the Animal Health and Welfare Plan. Suggestions also included that the improvement in mortality related to losses at birthing time be a requirement of the standard.

TEXTILE EXCHANGE RESPONSE:

Some additional information on monitoring at birthing times will be added to the user manual guidance but this will vary depending on the farm system. When it comes to planning for breeding, it could be part of the overall Animal Health and Welfare Plan yet the specifics of what needs to be considered sits best in this section. Regarding improvements in mortality over time, this should be part of the Regenerative Agriculture Outcome Framework which looks at outcomes and trends rather than this standard.

3. Some stakeholders have asked for a complete ban on surgical artificial insemination (AI) and electroejaculation. Some wanted a clearer definition of competency when practicing surgical artificial insemination and that only veterinarians (and not competent workers) carry out fetotomy.

TEXTILE EXCHANGE RESPONSE:

Surgical (laparoscopic) AI is already only permitted when carried out by a veterinarian or under veterinary supervision to protect welfare.

Electroejaculation is already tightly controlled and only permissible when carried out by a veterinarian. This should be sufficient to protect animal welfare.

- a. In terms of what makes a competent operator, this is already stated in the terms and definitions that accompany the standard. Regarding the fetotomy comment, the requirement already states that this operation must be performed by a skilled person rather than a competent worker. This recognizes the risk of causing harm to the mother but also that waiting for a veterinarian to attend could cause the death of the mother, given the remoteness of many certified sites, so this operation is not restricted solely to veterinarians.

There was much commentary made on weaning age requirements in the standard:

1. The Materials Matter Standard takes a different approach to the current RAF standards, setting different weaning ages depending on whether young animals are reared by their mothers/foster mothers or artificially. Some reviewers felt they should be the same regardless.

TEXTILE EXCHANGE RESPONSE:

It's important to note that the conditions for artificially reared lambs and kids will be different to those on their mothers. Many farmers will provide more concentrate feeds at an earlier age for artificially reared animals, which means their digestive tracts will be adapted for weaning at earlier ages than animals that are just suckling their mothers. Please also note that this is the minimum age for weaning artificially reared lambs and kids which doesn't stop those farmers not providing concentrates or other high value feeds from continuing to feed milk for longer.

2. In draft V1, the age for lambs and kids to be weaned from their mothers was set at eight weeks. Some asked whether lambs and kids were realistically ever weaned prior to this date and others suggested an extension to 14 weeks minimum. A review of recommendations for grass-based systems suggested 14 weeks was too long but 12 weeks might be achievable. This was set as the criterion for lambs and kids in draft V2 and some oppositions were raised by several reviewers. Firstly, comments were made that age was a poor determinant of when to wean an animal, with some stakeholders suggesting that weight and intake of feed and forage are much better determinants, but they recognized that this is very challenging to audit. It was also pointed out that there are many different systems of animal management even within the same country (some farmers use a lot more concentrated feed, while others manage their animals totally on grass-based systems) and this will cause variation in optimum weaning age.

Year-to-year variation in feed/forage availability also impacts this. One reviewer prefers 16 weeks, but this is far beyond the multiple submissions from other reviewers from various regions that say this is not possible as a minimum.

TEXTILE EXCHANGE RESPONSE:

Having reviewed all the comments from draft V2 of the standard, we agree that setting a minimum of eight weeks before lambs and kids can be weaned from their mothers protects their welfare and allows for flexibility in years where climate and vegetation quality do not allow for older weaning ages.

3. A new leadership criterion recommending not carrying out other stressful procedures within two weeks following weaning caused some confusion. Castration was given as an example of a stressful procedure but sheep and goats castration must take place before this time or it would exceed the maximum age for this procedure.

TEXTILE EXCHANGE RESPONSE:

Both the criterion, intent, and clarification relating to stressful practices around weaning time have been reworded. It has specifically been proposed as a leadership criterion because it is considered best practice, but we understand that it would require significant change from current practice. This also resolves the contrary view that this should be a conformance-related criterion.

Handling and transport

Regarding feedback on defined responsibilities for animal handling and transport:

In the RAF standards, transport is in a separate annex that only applies when the certified organization manages transport. In contrast, the Materials Matter Standard included transport criteria within the main standard, applying to all aspects of down production. However, for animal fibers, the standards are divided into two themes; handling and transport for all certified sites (theme 4.8); handling and transport, applicable only when the certified organization controls animal movement (theme 4.9). Several reviewers raised concerns regarding auditing transport requirements, particularly in cases where farmers sell livestock through agents who arrange the sale with a buyer and then organizes transport. Questions were asked about the feasibility of auditing these agents and their contractors when animals originating from certified farms are transported.

TEXTILE EXCHANGE RESPONSE:

As noted in the question above, there are two themes covering transport. Theme 4.8 is applicable to all certified organizations and covers topics that all farms can manage, regardless of whether they are arranging transport or not. Section 4.9 is only applicable when the certified farm is responsible for transport. Reviewer concerns about auditability were raised under theme 4.9 and reviewers had not realized that this section was not applicable when a third party arranges transport or transport is otherwise outside of the certified organization's control.

We received feedback on handling and transport for all certified sites (theme 4.8):

1. There is a new criterion aligned with delivering positive outcomes for animals as part of the Five Domains model of animal welfare. In draft V1, this required positive handling of animals from a young age, while in draft V2 this was amended to confident handling following reviewers' comments. Reviewers were still concerned about how this criterion could be assessed during the audit.

TEXTILE EXCHANGE RESPONSE:

Regarding the comment that the outcome of positive handling cannot be audited, there are outcome assessments (approach test) for this in the Animal Welfare Indicators for sheep and goats. We recognize that this cannot easily be assessed for animals on extensive pasture but can be assessed when animals are in pens or yard.

- a. Aside from outcomes, the practice of ensuring that young animals are treated carefully during their first experiences with humans can also be audited. Certified organizations can be asked about how they manage young animals and what special measures they take to ensure their initial experiences with humans are positive. For example, some farmers do not permit shouting, whistling, or the use of dogs to develop a more positive method of handling. The intent and clarification has been updated to give more details on the expectation for this criterion.
2. A reviewer wanted to add animals that needed euthanasia to the criterion relating to handling animals with special needs, with a specific requirement that such animals should not be moved. There was also a request to define animals in late gestation as being those that have gone through 40% of their expected pregnancy or more.

TEXTILE EXCHANGE RESPONSE:

In the criterion dealing with animals with special needs, the request to state that animals that need to be euthanized must not be moved is not added here as this is already covered in a criterion specific to euthanasia (4.1.25).

- a. One reviewer's preferred definition of "heavily pregnant" is not the same as the one used by this standard. The animal fiber industry (and this standard) uses two thirds of pregnancy (i.e., 100 days gestation or more for sheep and goats).

3. In drafts V1 and V2, there was a specific criterion requiring animals to not be exposed to sudden or loud noise that could cause fear or stress. Reviewers were concerned about how this might be audited in practice, for instance, if barks from a herding dog should be accounted for as a stressful noise.

TEXTILE EXCHANGE RESPONSE:

Eliminating noise that could cause stress to the animals, like a dog's bark, was not the intent, but it is important to consider noise as part of good handling. This criterion has instead been incorporated in the expanded intent and determination for criterion 4.8.7 which describes methods for moving animals that do not rely on physical contact. This change also resolves concerns about how noise levels at handling would be audited.

4. Reviewers raised questions about the use of electric prods, asking specifically to prohibit these when animals are handled at slaughter. Other points about how this criterion is currently audited in RAF were also raised. Some auditors have given non-conformances for farms that own an electric prod, even when these are only used on non-certified animals (e.g., when used for cattle that are also present on a wool-certified farm).

TEXTILE EXCHANGE RESPONSE:

Electric prodders are already prohibited at slaughter (see 4.11.15). The comment may have arisen from a misreading of the intent and clarification which state that no kind of electric shock may be used on certified animals aside from electric stunning devices at slaughter, which is an accepted method to induce instantaneous unconsciousness before death. The comment raised about current certification body confusion in applying the existing RAF prohibition on electric prods has been dealt with separately. The final point on this topic was that the use of electric prods on sheep is already illegal in some regions, but this is not true across all regions where the standard is applied, so this criterion is still needed.

5. A reviewer commented that there should be specific timelines for placing animals into groups for transport and that all transport durations should align with the white paper on transport produced by Eurogroup for Animals. The maximum transport times in this document are considerably shorter than the times defined by the standard. During transport, the same reviewer requested that EFSA guidelines on feed and water during transport be incorporated into this standard.

TEXTILE EXCHANGE RESPONSE:

The intent and clarification for this criterion already gives additional details on the expectation (i.e., enough time for a stable hierarchy to be formed) so it is measurable without a set length of time, which would in any case vary depending in the situation.

- a. Similarly, requests for quantification of warm conditions when animals must have water prior to loading for transport are not possible as situations and temperatures will vary from region to region and farm to farm so it is not possible to be specific.
 - b. Regarding the request to base transport criteria and duration on the Eurogroup for Animals white paper, this paper proposes a maximum transport duration of four hours for fiber animals that are less than one year old and eight hours for other animals. The paper can be found [here](#). These transport durations would be hard to achieve in Europe and are not possible to achieve in much larger countries and regions in which certification takes place. Requiring these limits on transport would markedly reduce the number of farms covered by this certification, potentially eliminating participation in some countries.
 - c. There was also a request to follow EFSA guidance on feed and drink during transport. This reference to EFSA shows that there are no documented studies on successful feeding of sheep during the transit stage. This criterion is also designed to account for feed and water at any rest stops during a long-haul journey and it is not clear if the comments from this reviewer referring to EFSA apply to that kind of feed and watering. No changes were therefore made.
6. Looking at the types of animals that may and may not be transported, a reviewer requested alignment with the white paper on transport produced by Eurogroup for Animals, specifically on animals that may not be transported. They also asked for the restriction on transport of pregnant animals to be amended so that those over 40% of gestation are not transported.

TEXTILE EXCHANGE RESPONSE:

The Eurogroup for Animals white paper gives references to research about transporting animals in late gestation. That research supports not moving pregnant animals after 80% of gestation, not 40%. Additionally, this specific topic refers to laboratory animals listed as rodents, rabbits, ferrets, dogs, cats, nonhuman primates, minipigs, and amphibians. This does not seem to be a good rationale for prohibiting transport of sheep, goats, and alpacas once they are at 40% gestation or more. No reference is provided by Eurogroup for Animals in support of the contention that animals that have given birth in the previous eight weeks may never be moved.

- a. For waterfowl, the criterion in the standard describing animals that are not fit to be transported already aligns with Eurogroup for Animals as requested by the reviewer.

7. The critical level prohibiting exporting live animals for slaughter was questioned by some reviewers and asked that this requirement be reconsidered since some Eastern countries purchase animals shipped for slaughter for religious reasons.

TEXTILE EXCHANGE RESPONSE:

It is understood that some countries buy live animals for slaughter in that same country. This is exactly the concern that this criterion is seeking to address, hence no change is made.

We received commentary on handling and transport when this is carried out under the control or management of the certified organization (theme 4.9):

1. One stakeholder asked what is expected if loaded animals are not seen during an audit and cannot be assessed for correct stocking density and ability to stand in a normal posture. Another commented that requirements in this section should be applicable for all animals.

TEXTILE EXCHANGE RESPONSE:

The intent and clarification was amended to give details of what needs to be checked if animals are not seen loaded at audit, such that the certified organization would need to provide information on size/height of compartments and numbers of animals that would be loaded.

- a. The request about making all transport criteria applicable to all animal fiber farms does not recognize that transport undertaken by third parties that are not under the control of the certified site are outside the scope of certification and would not be auditable.

2. The space allowances for sheep and goats in transport – which shift from recommended in RAF to required in this standard – were questioned, with an alternative reference provided giving space allowances according to the weight and size of the animals.

TEXTILE EXCHANGE RESPONSE:

This criterion (4.9.14) was amended based on the concerns raised by the reviewer and their alternative reference source for space in transport. This gives more clearly defined space per animal depending on the weight/size.

3. Similar request from another reviewer to amend space allowances for waterfowl in line with the white paper on transport from Eurogroup for Animals.

TEXTILE EXCHANGE RESPONSE:

The reference provided was reviewed but it doesn't have any space allowances for animals but refers to a further German paper which lists the international space allowances for poultry exactly as listed in this criterion. There are additional national allowances in the German paper which provide more space for each weight category of bird, but it's not possible to see what the rationale is for these. It's also important to note that this is an international standard, not one that only operates in Germany.

4. There was a request that the down/waterfowl specific leadership criterion recommending transport vehicles are weighed on arrival at the slaughter plant to check stocking density be extended to fiber animals, too.

TEXTILE EXCHANGE RESPONSE:

This requirement on weighing trucks at the slaughter plant is specific for down/waterfowl as it's nearly impossible to count the individual unloaded birds if there is a concern that they may have been overstocked. With mammals, the number of animals in each compartment can be assessed at unloading without the need to weigh the truck.

5. There was a request that the requirement for rest periods that must be provided after fiber animals have been transported for a set period be extended to include down/waterfowl.

TEXTILE EXCHANGE RESPONSE:

The rest period requirement is not applicable to water fowl as certified farms need to be within a maximum of eight hours to cover both loading and transport to the slaughterhouse. The eight hours maximum has been in effect for RDS since 2014 without issue. Unloading and providing feed and water for waterfowl at a rest stop is not generally feasible in any case as waterfowl are usually transported in crates. No change needed.

6. A reviewer commented that there needs to be an in-transit humane killing plan.

TEXTILE EXCHANGE RESPONSE:

There is already a requirement for action to be taken when animals are found to be distressed or injured during transport. The intent and clarification already requires the driver to have a contact for a competent person if the situation is beyond their management.

Euthanasia and on-farm slaughter

We received substantial feedback on requirements concerning euthanasia and on-farm slaughter:

1. Stakeholders asked why there was a need to clarify between on-farm slaughter and euthanasia.

TEXTILE EXCHANGE RESPONSE:

These are two different situations. Euthanasia applies when an animal is sick or injured without hope of recovery. The number of animals that require euthanasia each year cannot be predicted. Slaughter, on the other hand, is the planned death of an animal. The certified organization will be able to prepare for this, unlike euthanasia which will generally take place in an animal health and welfare emergency. This is currently defined in the RAF user manuals and we will ensure the definitions are clearly understood for the Materials Matter Standard.

When it comes to the number of birds that could be euthanized by manual cervical dislocation in a single day, the points raised by the reviewer were accepted and the maximum number of birds that can be euthanized by this method is reduced to 20 per day.

2. A concern was raised about the inclusion of cervical dislocation as a euthanasia method for waterfowl. Reviewer would like this option removed and noted that it was not recommended by the American Veterinary Medical Association (AVMA). Further comments on this method were raised in respect of the number of birds that a single

worker could be permitted to euthanize in a single day. Draft V.2 allowed the same maximum of 70 birds as defined in RDS.

TEXTILE EXCHANGE RESPONSE:

Cervical dislocation is only included as a last-resort method for euthanasia when finding other methods would prolong bird suffering. The balance is between the time taken to get the correct tool and come back to deal with a suffering bird and immediately putting it out of its misery using a less perfect method. The comments that AVMA do not support cervical dislocation were noted. However, this method is still included as acceptable (with conditions) for poultry in the AVMA [Guidelines for Euthanasia](#) and the EFSA document [Killing for purposes other than slaughter: Poultry](#). These sources highlight that this method may have advantages compared to other methods as it can be performed immediately with no equipment. The allowance to use this method as a last resort for euthanasia is retained.

3. Several reviewers commented on the emergency use of exsanguination (i.e., cutting with a knife without pre-stunning) as an option for euthanasia. This was cited by some as an unacceptable method. It was proposed that to be certified, organizations must have appropriate equipment that either allows for immediate death (i.e., firearm) or equipment that will stun the animal before it is bled (e.g., captive bolt gun). Other reviewers commented that firearms were available for all farms so no exceptions should be permitted, while some questioned the animal welfare and the safety of workers if firearms were used. Additionally, some accepted the use of a knife without pre-stunning for euthanasia but requested it be shown as a last-resort method.
 - a. A converse view came from farmers currently certified to RAF who were unable to access tools to stun animals prior to euthanasia and were concerned that if the emergency use of exsanguination was prohibited by the Materials Matter Standard, they would no longer be able to be certified.

TEXTILE EXCHANGE RESPONSE:

Knife slaughter without pre-stunning is already cited as a last-resort method in all regions where alternative tools for euthanasia are available. However, contrary to reviewers' comments, in some regions, it is not possible for all farmers to have firearms and other tools, such as captive bolt guns, are not legally available. There is therefore an allowance in the intent and clarification for exsanguination to be permitted for all euthanasia in those regions.

- a. Reviewer's suggestions to remove this allowance and only certify farms that could provide stunning (or stun-to-kill methods i.e., firearms) as part of the euthanasia process were not taken up. This would remove a lot of countries from the potential of certification with the subsequent loss of other welfare benefits from being certified.
- b. Euthanasia without prior stunning remains a last resort when other methods are unavailable, but this is not seen as a reason to disengage from certification altogether.

4. For on-farm slaughter, one reviewer proposed that only a veterinarian be permitted to carry out this procedure.

TEXTILE EXCHANGE RESPONSE:

It is not clear what the purpose would be as the only method a veterinarian could use that a trained and competent worker could not is injectable barbiturates, which would render the meat unusable. Access to veterinarians is also challenging for many animal fiber farms that are often in remote rural settings.

- a. A trained and competent worker as required by this standard can achieve humane slaughter.

5. Additionally, for on-farm slaughter, one reviewer proposed the allowance for the "dog tucker" method. This is used when killing animals to provide food for working dogs and entails exsanguination without prior stunning.

TEXTILE EXCHANGE RESPONSE:

See reference to point 3 above. Knife slaughter without pre-stunning is only acceptable in emergency situations when an animal urgently needs to be euthanized and other tools are not readily available. Planned slaughter of animals to provide food for farm dogs does not fall into this category.

6. Some reviewers suggested that the use of a firearm for on-farm slaughter would ruin the meat and would not address welfare at slaughter.

TEXTILE EXCHANGE RESPONSE:

Firearms are often used for euthanasia and many resources (for example AVMA and Humane Slaughter Association) cite this a good method. In the hands of a trained and competent worker – as required by this standard – a firearm of the correct caliber with the correct ammunition will provide a rapid death for the animal. The exact positioning of the shot will be described in the user manual for different types of animals (as it is in the RAF user manuals), but for all animals the recommendation is a head shot, which allows the main body of the animal to be used for meat.

Stakeholders had specific and extensive concerns around slaughter methods:

1. Some stakeholders feel that cervical dislocation and cutting the throat of a non-stunned animal is inhumane and should not be supported as humane methods of killing. Additional ask for a comprehensive list of humane killing and euthanasia methods and requirements have been listed throughout the document. It is important to note that some stakeholders object to some killing methods and stakeholders would like to see a list of pros and cons.

TEXTILE EXCHANGE RESPONSE:

All RAF requirements for euthanasia and on-farm slaughter are retained for the Materials Matter Standard. This includes the allowance to euthanize animals without pre-stunning (i.e., using a knife) when animals are in severe pain and finding access to tools for stunning would prolong the suffering. The criterion's intent and clarification for this point gives examples of when this could be acceptable (4.10.10). A list of acceptable methods for stunning animals for euthanasia has been added. RAF includes a list of methods for on-farm slaughter but not euthanasia. The signs that must be observed to confirm death have been updated (4.11.42).

2. There was an ask to amend the standard to state that, for all animals, the preclusion of stunning can only be performed under gunshot, captive bolt, or injectable methods via a veterinarian. On top of that, it was required to add a minimum and maximum amount of time for stunning until final humane killing method is employed to avoid recovery and regaining of consciousness. For all animals, this needs to be specified and the method of stunning is required (e.g., head only or full body). Some feedback asked for the standard to explicitly state that using a firearm carries risk.

TEXTILE EXCHANGE RESPONSE:

We amended this criterion (4.10.12) to merge with the old (4.10.9). The Minimum/maximum times for stunning are already specified in the standard (15 seconds between stun and bleed). The time between captive bolt and pithing or bleeding has also been amended to align with slaughterhouse requirements. There was feedback about the inability to slaughter an animal with a firearm without ruining the meat, in addition to welfare concerns. We suggest that the reviewer looks at the Humane Slaughter Association website, plus other animal welfare standards, to reassure themselves that this is recognized as a quick method of killing that does not spoil the meat.

Slaughterhouse

Some of the general comments we received on this section of the standard include:

1. There was some confusion about when the slaughter requirements apply and if all certified farms must have on-farm slaughterhouses.

TEXTILE EXCHANGE RESPONSE:

Theme 4.11 is dedicated to slaughterhouses, a separate facility for slaughtering animals. On-farm slaughter is handled in theme 4.10. For animal fibers, theme 4.11. is only applicable when there is a wish to have traceable skins that come from animals raised to this standard. This is a voluntary addition to the standard; not all certified farms have to ensure that their slaughter facilities are audited to meet these criteria.

For down production, theme 4.11 must be met. It is mandatory not voluntary, as it is in the RDS.

2. There was a request for worker training and competence requirements in the slaughterhouse section to be applied to all workers in the standard.

TEXTILE EXCHANGE RESPONSE:

For farm workers, competency requirements are already applied throughout the standard; see 1.2.1, 1.2.3, 1.2.5, and 4.1.11.

3. Reviewers expressed concern about the use of electric prods at slaughterhouses and proposed parameters under which these could be used.

TEXTILE EXCHANGE RESPONSE:

Reviewers' concerns about electric prods appears to be a misread of the intent and clarification. Electric prodders are totally prohibited at the slaughterhouse as are any other electrical devices. The only device that can be used to administer a shock is an electric stun device that delivers the correct current to ensure the animal is immediately insensible and remains that way until death is confirmed.

Comments were received regarding slaughterhouse requirements for waterfowl:

1. A comment required that records maintained by the slaughterhouse on the numbers of sick, injured, and dead birds should be passed back to the source farm.

TEXTILE EXCHANGE RESPONSE:

Regarding the comment that information should be passed back to the farm so that necessary action can be taken for future loads of birds. This is best practice, so a new leadership criterion has been added at 4.11.8.

2. A reviewer objected to the use of waterbaths under any circumstances and requested that the leadership criterion that recommends this method of stunning is not used be made into a requirement.

TEXTILE EXCHANGE RESPONSE:

This request asked that the leadership prohibition on waterbaths is made a conformance-related criterion. Will there is a consensus that waterbaths pose welfare challenges, there is currently no sufficient alternative system in place for ducks and geese to justify a complete prohibition of this method. As a result, this standard includes guidelines on best practices for waterbath stunning. The prohibition on this method, however, remains a leadership criterion. For chickens and turkeys, some alternatives, such as controlled atmosphere stunning or killing, are available. Nevertheless, there are still some welfare concerns associated with these alternatives for waterfowl, as highlighted in the Humane Society International report. Therefore, a simple solution to this issue has not yet been found.

3. There were several criteria that were carried over into the Materials Matter Standard from the voluntary slaughter module in RAF. These include using appropriate propellants for captive bolt guns, checking consciousness of animals after stunning, and bleeding animals within a time frame such that they never regain consciousness. These were only indicated for animal fiber skins and stakeholders suggested these were equally applicable for waterfowl.

TEXTILE EXCHANGE RESPONSE:

We agree with the reviewer and have added down into the scope for criteria 4.11.38 through to 4.11.42 inclusive.

We received comments on requirements for fiber animals at the slaughterhouse:

1. Reviewers raised concerns about the requirement that animals must be fed if they are held at the slaughterhouse for 12 hours or more. Some reviewers raised concerns about pregnant animals staying this long without feed and others noted the difference between this requirement and feed and water deprivation elsewhere in the standard (e.g., pre-shearing).

TEXTILE EXCHANGE RESPONSE:

The rationale for this is that the feeding time is coming after the deprivation occurring during transport. It's not 12 hours from the last feed the animal had. Regarding the comment that 12 hours is too long particularly for pregnant ewes and unwell animals, pregnant ewes will not commonly be sent to slaughter, and, in most regions, it is illegal for unwell animals to be sent to a slaughterhouse.

- a. Withholding feed from animals prior to slaughter is a common practice to reduce the risk of fecal contamination of meat. Typically, animals are slaughtered within 12 hours of arriving at the slaughterhouse. However, this criterion ensures that if there are any delays or breakdowns, the animals will be fed. This requirement is in alignment with EU legislation. It is important that this criterion applies only to food. Criterion 4.11.19 mandates that water must always be available to animals held at the slaughterhouse before slaughter.

2. The standard requires stunning as part of slaughter, but one reviewer noted that this should specify stunning prior to slaughter to close any possible loopholes that could impact animal welfare. Another reviewer requested that this criterion on stunning be extended to waterfowl.

TEXTILE EXCHANGE RESPONSE:

This proposal was accepted, and an amendment was made to criterion 4.11.33 to specify stunning prior to slaughter. For waterfowl, there are already multiple criteria relating to the stunning of birds at slaughter. See 4.11.24 to 4.11.32.

3. A reviewer commented that the minimum amperage specified for head-only stunning of may not be applicable to all species, and that more detailed species-specific information is needed.

TEXTILE EXCHANGE RESPONSE:

The feedback suggested that the specified amperage might not suit all species. However, this is the recommended level for sheep and goats, as supported by EFSA guidelines. Although research on alpaca is limited, this amperage has also been adopted for the RAS. Regarding the suggestion to include timing and voltage alongside amperage, EFSA references indicate that current is the most crucial factor for effective stunning. While timing is important, ensuring that animals unconscious until death (as required by criterion 4.11.33) is more critical than the duration for which device is applied.

4. A comment was received about the intent and clarification specific to mammals for the criterion covering bleeding at slaughter (4.11.43) that is not applicable to cattle, pigs, and alpacas.

TEXTILE EXCHANGE RESPONSE:

Cattle and pigs are outside the scope of this standard. For alpacas, there is no reason why the details provided are not acceptable and an alternative wording has not been proposed by the reviewer. No change was made.

5. Concerns were raised regarding the factors that must be reviewed to confirm the death of an animal. The criterion was deemed insufficient on this point and alternative proposals aligning with the Humane Slaughter Association, USDA, and other organizations were proposed.

TEXTILE EXCHANGE RESPONSE:

This criterion has been amended, as per reviewer comments, and also aligns with requirements for signs of death for on-farm slaughter.

Principle 5 – Processing Facility

General comments:

Wool stakeholders emphasized the importance of using the legal framework of the country or market where wool and animal fiber processing (scouring) primarily occur, such as South Africa, EU, and Australia. However, other stakeholders flagged that legal requirements vary by geography, leading to the need for Textile Exchange to develop its own effluent discharge parameters. Regarding chemical management and restriction goals, stakeholders requested that the standard differentiate between small, medium, and large operations. They also emphasized the importance of considering the demographic context in these guidelines. Additionally, stakeholders sought stronger guidance and templates to assist with implementing the processing facility requirements. Between the first and the second drafts, stakeholders noted that it was unclear how the criteria under Principle 5 apply to MMCF altogether.

There was significant passion around the topic of chemical management and restrictions:

1. Some stakeholder reached a consensus that the new chemical requirements, waste treatment protocols, and social criteria are appropriate for its first processors (Tier 4). However, they expressed concerns that these standards would be challenging to comply with in Tiers 1-3.

TEXTILE EXCHANGE RESPONSE:

The Processing Facility section of the MM Standard specifically applies to the first processing stage (Tier 4) of raw materials and initial fiber manufacturing. Therefore, the criteria are tailored to these processes and are not applicable for downstream textile processes (Tiers 3-1), which are outside of the scope of this standard.

2. A few of stakeholders questioned why Safety Data Sheets (SDS) are required to be in English, especially in regions where it may not be the primary language.

TEXTILE EXCHANGE RESPONSE:

The requirement for SDS to be in English is inherited from the GRS. It is not a new or aspirational requirement; chemical suppliers can easily provide SDS in English without issue. This approach may help address the situation when SDS need to be shared across different geographies.

3. Stakeholders would like to see a process in place that enforces restricted chemicals and ensures they are not in use.

TEXTILE EXCHANGE RESPONSE:

To fulfil any standard criteria, facilities would require a process to monitor and evaluate restricted chemicals to consistently meet the requirements.

4. Stakeholders highlighted that the external documents referenced in the criteria should be clearly defined as applicable to fiber manufacturing and not to Tier 1-3.

TEXTILE EXCHANGE RESPONSE:

About “ZDHC MMCF Guidelines, and EU – BREF: Polymers and Pulp Documents”, per the name suggests these referenced documents are relevant to fiber manufacturing or polymer manufacturing and are not applicable to Tiers 3-1.

5. There were a lot of comments received on the topic of testing. Many stakeholders suggested that Textile Exchange should adopt a Risk-Based Approach for screening for hazardous chemicals, focusing on those more likely to be found in recycled materials, rather than requiring testing for every instance. To maximize the benefits across the supply chain, stakeholders recommended that Textile Exchange oversee the Risk Assessment process. This should be conducted by organizations with scientific and technical expertise and extensive experience in the textile sector. This would ensure that
 - (i) Certified entities, brands, and retailers can all benefit from the assessment outcomes
 - (ii) Sampling plans and activities implemented by certified entities are scientifically based.

Stakeholders also suggested that Textile Exchange require test reports to be shared up the supply chain, avoiding private reports by fiber suppliers. This would help reduce additional costs in cases where tests have already been conducted. Stakeholders requested clarity on which Restricted Substances List (RSL) to test against and how often testing should be conducted. For example, material sourced from a mill might be produced over weeks and then mixed into a single bale. In continuous processes, defining a "batch" can be challenging, so a time-based testing approach was suggested instead. Additionally, it was recommended that hazardous chemicals to be tested should be differentiated based on the type of material (e.g., natural vegetable fibers, natural animal fibers, synthetic fibers, and MMF). This would take into consideration the specific inputs manufacturing processes associated with different materials.

TEXTILE EXCHANGE RESPONSE:

Given the significant volume of comments and concerns regarding the testing criteria, the requirement for testing reclaimed feedstock has been removed from the pilot version of the Materials Matter Standard. We acknowledge that developing testing requirements is beyond its scope and expertise. To address these concerns, the performance determination section of the recycled output testing criterion has been updated. It now clarifies that guidance on testing will be included in the next iteration of the standard, referencing work from external stakeholders who have expertise in this topic. Meanwhile, each facility is expected to conduct its own risk assessment to determine the necessary testing parameters, limit values, and testing frequency. Facilities may also choose to align with any RSL or the legal requirements of the country where the products will be sold.

6. There was a general sentiment among stakeholders that no chemical management approach is entirely risk-free. Specifically, on the topic of ethylene glycol, it was noted that some industries simply have no viable alternatives to its use. While experts agree that ethylene glycol is safe for use during manufacturing, stakeholders recommended aligning the requirements with Zero Discharge of Hazardous Chemicals (ZDHC) and Sustainable Textile Production (STEP) to minimize any potential risks.

TEXTILE EXCHANGE RESPONSE:

The current chemical management sub-section of the Materials Matter Standard does not restrict hazardous chemicals. Instead it encourages facilities to adopt advanced chemical management practices, such as closed-loop manufacturing and solvent/chemical recovery systems. The hazard codes criterion has now been designated as a leadership criterion (voluntary) for certification. This means that hazardous chemicals may still be used in the manufacturing of certified products, provided that advanced chemical management practices are in place.

7. On the topic of organizations required to follow best available techniques for Dissolved Grade pulp, stakeholders noted that the EU Best Available Techniques Reference (BREF) document primarily covers paper, pulp, and paperboard manufacturing. Because dissolving pulp production is a niche within the European Union, relevant data is limited and not fully understood. While some stakeholders found alignment with EU BREF unclear due to the lack of specific data, others saw it as a valuable reference. One stakeholder highlighted that water level management is crucial for reducing CO₂ emissions and suggested that it should be standardized. Additionally, there was a recommendation that resource stewardship should encompass not only the percentage of recycled content but also the input and output volume from processing. There was also interest in achieving 1% traceability from raw materials.

TEXTILE EXCHANGE RESPONSE:

In response to these concerns, it is acknowledged that the EU BREF document is not specifically designed for dissolved pulp. However, as mentioned previously, EU BREF serves as a placeholder until ZDHC develops guidelines specifically for dissolved pulp from both virgin and reclaimed feedstock. The expectation is that facilities will eventually meet ZDHC MMCF requirements. Regarding the importance of peatland water levels as a metric for CO₂ emissions, we recognize its potential value but leave it to each site or organization to decide how best to track their CO₂ emissions.

8. There was concern around the elimination of ZDHC Manufacturing Restricted Substances List (MRSL) guidance as it could hinder innovations in chemistry towards safer alternatives.

TEXTILE EXCHANGE RESPONSE:

We acknowledge this risk but emphasized that the ZDHC MRSL is designed for downstream textile wet processes. Therefore, it would be inappropriate to penalize polymer or fiber manufacturers and recyclers by requiring them to meet standards not intended for their processes. Replacing existing chemicals and processes is a complex, long-term endeavor. Even when safer alternatives are available, scaling these solutions can take years and may introduce unknown potential challenges. Therefore, existing industrial practice should not be compromised when facilities can implement Best Available Techniques (BAT) to mitigate risks and pollution. The criteria and requirements may evolve in future iterations of the standard. Although the MRSL requirements has been replaced with other relevant guidelines in the current version, it may be reintroduced in the future, depending on industry advancements.

9. Lastly, there were concerns about obstacles to recycled material inputs and stakeholders asked to align definitions with industry practices when it comes to 'recycled', 'reclaimed', 'pre-consumer', and 'post-consumer'. What does or does not qualify under these terms has caused confusion under the GRS and RCS standards and stakeholders are hoping for more clarity within the Materials Matter Standard.

TEXTILE EXCHANGE RESPONSE:

“Recycled content” is a regulated term and what qualifies as reclaimed material should fit in the definition of pre-post-consumer materials. Although pre-post-consumer definitions referred to from ISO documents may be old, these definitions are time tested and globally recognized. Additionally, standards play a critical role in maintaining the integrity of the recycled content and the intention is not to increase waste generation for the sake of certification. Although we do not claim to have everything in our control, we do not want to intentionally alter the definitions to accommodate additional feedstock. Furthermore, there was a concern raised over a voluntary criterion requiring textile feedstocks, meaning we are not going to certify non-textile products. The current standard focus is textile outputs, including recycled textiles, but as mentioned earlier in our response, it is yet to be decided how to deal with non-textile recycled outputs going further.

Waste management

Many stakeholders chimed in on the waste management criteria within the standard:

1. Regarding the inclusion of collectors and concentrators within the scope of the standard, opinions were very divided. Some agreed that they should be included as entry points for certification, while others said it would be challenging to verify them. However, verifying them now would make it easier to align with future EU requirements. The counter argument was made that inclusion would increase costs and create superfluous bureaucracy.

TEXTILE EXCHANGE RESPONSE:

We have heard and noted all the pros and cons on this topic. It is something that we are still trying to explore and may cover under the revised CCS if not as part of the Materials Matter Standard going forward.

2. Stakeholder suggested including recognition for other next-generation feedstocks, such as carbon emissions from other industries and agricultural and forestry residues converted into raw materials like ethanol for textile production, and asked whether these feedstocks would qualify under any of the categories.

TEXTILE EXCHANGE RESPONSE:

We are planning to recognize these next-generation feedstocks certified under other industries' T4 certifications, such as forestry and ISCC, so that certified outputs from these schemes can become qualified inputs for our standards. However, this has a longer roadmap as it would involve benchmarking and comprehending these schemes on their procedures before recognizing them.

3. Between the first and second draft of the standard, there was some confusion around the materials these criteria apply to. Some stakeholders interpreted these criteria to apply to cotton only and there was a desire for them to be applied to all materials, including cotton.

TEXTILE EXCHANGE RESPONSE:

A few criteria in the waste management sub-section of the Materials Matter Standard pilot version, which were earlier applicable only to cotton, are now made applicable to all materials. The few feedback on the chemical management, water use, discharge and air emissions sub-sections were not relevant because the focus of the standard is processing and ginning as the first process/step in farmed cotton. This process is not critical from chemical, water or air emissions related aspects. Therefore, it makes sense to keep these criteria as non-applicable to virgin cotton ginning operation.

4. Stakeholders required more detail within the standard when it comes to waste management in some instances. First, it was asked to require strict recordkeeping on the origin of feedstock sources (e.g. bottle or textile feedstock and fishnets). Second, they asked for proof from a post-industrial to post-consumer recycling pathway, particularly for hard-to-recycle options like polycotton.

TEXTILE EXCHANGE RESPONSE:

- a. We received feedback from brands who asked to know about the source of the reclaimed material used in manufacturing of their recycled garments (e.g., PET bottles and textile waste). We acknowledge this request and there are high-level discussions on this topic internally on how this information can be shared across the supply chain from the recycler via our tracking system (Transaction Certificate and TrackIt).
- b. We also received feedback suggesting a path for recycling materials from post-industrial to post-consumer stages. However, we do not differentiate between pre-consumer and post-industrial materials into a single category of 'pre-consumer' materials. This is because the term 'post-industrial' lacks a specific definition in ISO and is often used interchangeably with 'pre-consumer' within the industry. We recognize that the supply chain also uses the term 'post-industrial' loosely. Importantly, post-industrial feedstock can be used in recycling claims. In contrast, 'post-consumer material' is a well-established term. It refers to any product that has completed its life cycle as post-consumer material.

5. One stakeholder requested to introduce the concept of "refurbished" material to promote the circular economy. The stakeholder also pointed out that the criterion was confusingly using "waste" and "by-product" concepts interchangeably, which is incorrect as waste can be recycled while by-product cannot. There is a concern that

standard criteria may conflict with EU policies and other legislation if not properly defined.

TEXTILE EXCHANGE RESPONSE:

This feedback has been considered in the Materials Matter Standard pilot version. The criterion has been amended to clarify that the concept we are introducing is for by-products generated during manufacturing. There is however a possibility to introduce a different claim different for recycled materials. The stakeholder’s recommendation for “refurbished” materials may also be claimed under this concept.

6. A question was raised about a vertically integrated facility that conducts both recycling and Tier 3-1 operations. It was asked whether both the Materials Matter Standard and CCS would require audits in this case. Additionally, the stakeholder provided feedback indicating that that GRS 202 standard does not currently address accepted reclaimed materials for non-textile materials. Finally, it was noted that while reuse and recycling are beneficial for climate and nature goals, there is a potential risk of these practices being misused.

TEXTILE EXCHANGE RESPONSE:

Vertically integrated facilities that handle both recycling and other Tier 3-1 operations will have their recycling activities audited under the Materials Matter Standard, while the remaining operations will be audited for CCS. The Materials Matter Standard is currently under review regarding the future of recycled non-textile materials. However, since the GRS standard will still be in place for several years, we plan to update GRS 202 soon to include guidance on pre-consumer reclaimed feedstocks eligible for recycled non-textile materials. Lastly, to address concerns about reused materials potentially compromising the integrity of recycled claims, we are considering a new, separate claim for such reused and repurposed materials within the Materials Matter Standard to maintain clear distinctions between the two types of materials.

Water use and discharge

Water usage and discharge was another passionate topic for stakeholders:

1. One stakeholder flagged that it may be difficult to maintain records and water use measurements in rural areas.

TEXTILE EXCHANGE RESPONSE:

The criterion regarding monitoring water usage records is applicable for a processing facility and not at a farm level. Therefore, the facility is expected to have the necessary tools to monitor its industrial water consumption irrespective of its geographical location. We do not consider this a challenge but rather a baseline requirement.

2. Many stakeholders voiced that a definition of "meaningful", among other terms, needs to be added to avoid open interpretation during audits. Without a proper definition, the criteria should be changed to a Leadership Type/MEL Indicator. While some stakeholders actively work to reduce water usage, they do not always have public targets in place so a more aspirational approach would be appreciated.

TEXTILE EXCHANGE RESPONSE:

The term "meaningful" is not new and was used in the GRS standard. While it's a general term with various interpretations, we've kept it to give opportunities for companies of all sizes and locations to demonstrate their progress and set targets that are feasible for them to achieve. As previously explained, there can't be one single standard for all facilities to evaluate their continuous improvement aims due to differences in size, operations, capacity, and resources. Our local CBs are trained and qualified to understand the local context and assess facilities' operational advancements, ground realities, and other factors. Companies don't need to share their targets publicly but they should monitor their own progress.

3. Stakeholders suggested that compliance should be measured by permit levels, as established by local, state, and federal regulations, rather than ZDHC levels. Stakeholders noted that, while the Materials Matter Standard is intended primarily for textiles, it will be the de facto standard with the CCS for all trim components made with recycled materials used in apparel. Zippers, buttons, and other non-textile trims are not covered in the current version of ZDHC Wastewater Guidelines (WWG), and this needs clarification in the standard.

TEXTILE EXCHANGE RESPONSE:

The criterion seems to be misunderstood since complying with local legal regulations are considered the basic standard for every facility, and ZDHC guidelines go beyond those requirements. In some instances, ZDHC standards might be less strict than local regulations, so facilities should always follow the stricter rules. Another concern has been raised about wastewater discharge from non-textile products (like zippers and buttons) not being covered by ZDHC WWG. The Materials Matter Standard currently focuses on textile products, including recycled ones. The decision about whether to include recycled non-textile in the scope going forward is still under consideration by the executive team.

Air emissions

Around standard requirements on air emissions, stakeholders were concerned that the Climate+ strategy and outcomes are not concrete enough in the standard criteria. It was also suggested that the Paris Agreement or other recognized frameworks are used to set target objectives.

TEXTILE EXCHANGE RESPONSE:

The criterion for monitoring air emissions, initially a leadership criterion, was changed to a major conformance requirement in the Materials Matter Standard pilot version. This criterion applies to all materials, including natural fibers. We acknowledge that the air emissions criteria are intentionally generic, without specific plans or metrics, because it is not feasible to set a specific target for all types of materials and industries. Instead, we have left it to the facilities to implement the requirements based on their available resources, capacities, and other factors. While some facilities might be industry leaders, it is unrealistic to expect every facility to meet a specific target. That said, we may revisit these criteria in the next iteration of the standard to align with recognized frameworks as a baseline or target objective.

Energy use

On the topic of energy use, stakeholders shared the following feedback:

1. When considering the manufacturing processes, some stakeholders were unsure about which materials the criteria apply to. With Viscose and MMCF processes in mind, stakeholders expressed concern that the level of detail and prescriptiveness in some of the criteria might not lead to reduced energy use. Instead, they suggested that the standard should focus on efficiency targets. Additionally, stakeholders requested guidance on how reductions should be measured.

TEXTILE EXCHANGE RESPONSE:

Several other materials, such as cotton, and leadership criteria related to the MMCF-viscose process, which were included in the energy sub-section of the previous standard draft, were removed from the Materials Matter Standard. This decision was made because these criteria, which delved into the intricacies of the process, were deemed unrealistic for auditing purposes. The following topics are newly introduced and were not part of GRS energy use section.

2. Two stakeholders flagged that the dissolving grade pulp manufacturing requirements need to be considered in the context of textile-to-textile recycling and asked for more clarification around “spent liquors”. It was suggested to move some of these currently required criteria into leadership criteria to be more aspirational.

TEXTILE EXCHANGE RESPONSE:

To support the goals of reducing carbon emission and GHG emissions, a new criterion has been introduced for dissolving pulp manufacturers. This criterion requires that they recover value from their spent liquors by generating 50% of on-site electricity and steam, but it applies only to dissolving pulp produced from virgin inputs. Additionally, several new leadership criteria have been introduced, focusing on the transition from conventional energy sources to renewable sources of energy.

3. One stakeholder raised concerns around the economic viability of implementing some of the energy, air, and water-related criteria.

TEXTILE EXCHANGE RESPONSE:

These criteria are recommendations, but concerns were raised about economic viability. It is important to understand that these criteria are voluntary, and we don’t set specific targets. Facilities have the freedom to implement these criteria based on their available resources, economic considerations, and other factors. Similarly, stakeholder also commented on the economic viability of other criteria, such as air emission monitoring and wastewater testing. We want to emphasize that having monitoring plans and testing requirements in place are not aspirational but rather baseline requirements, serving as a starting point to understand where the facility currently stands in its environmental management program.

4. Lastly, stakeholders asked for more guidance on legal requirements and documents relevant to criteria for processors.

TEXTILE EXCHANGE RESPONSE:

Regarding feedback from a brand about the need for guidance on the legal requirements of a facility, we would like to highlight that any facility or site engaging in manufacturing activities must have the necessary permits and licenses approved by state or local government bodies. These requirements vary by country, so any factory operator should be well aware of the legal formalities required to run a factory and must remain in compliance with these requirements at all times. Therefore, there isn't a specific need for us to provide additional guidance on this topic. Similarly, this stakeholder enquired about the documentation needed for testing wastewater and recycled output. It is well understood that test reports are the necessary documents required to confirm compliance with any testing requirements.

Principle 6 - Chain of Custody

Applicability of the Content Claim Standard

A stakeholder asked about the applicability of the CCS when it comes to brokers. They gave the example of a broker managing a farm group, which is a common situation, where he purchases non-certified wool as part of his activities that are not specific to his farm group management, and asked whether he was then required to implement CCS-101.

TEXTILE EXCHANGE RESPONSE:

If the broker (or group manager) issues invoices for certified wool to buyers, then the broker, as in the example, would need to be certified under the CCS (in addition to being certified under the Materials Matter Standard). This is because the risk level increases when the group manager owns (and potentially handles) both certified and non-certified materials. However, if the broker (group manager) does not take legal possession of the certified wool from the group member farms (i.e., if each producer issues invoices directly to the buyer of certified wool), then the broker does not need to hold a separate CCS certificate to purchase non-certified wool.

One stakeholder inquired whether the chain of custody requirements in the standard apply to dissolving pulp processors.

TEXTILE EXCHANGE RESPONSE:

Dissolving pulp processors, whether using virgin or recycled inputs, and MMCF filament fiber manufacturers are required to meet the effluent discharge requirements outlined in the ZDHC MMCF guidelines. Although the ZDHC MMCF guidelines do not cover dissolving pulp from virgin or recycled inputs, they are expected to update their guideline to include these provisions by the end of 2024. The following topics are newly introduced and were not part of the GRS energy use section. Keeping in mind the goals of reducing carbon and GHG emissions, a criterion has been introduced for dissolving pulp manufacturers to recover value from their spent liquors by generating 50% on-site electricity and steam. This criterion applies only to dissolving pulp produced from virgin inputs. Additionally, multiple new leadership criteria have been introduced, focusing on the transition from conventional energy sources to renewable energy sources.

Stakeholders posed questions regarding traceability, data collection and monitoring, and recognition:

1. Stakeholders consistently asked us to accept other standards into our standards system to provide traceability (e.g. International Sustainability & Carbon Certification (ISCC) in the case of chemical recycling “first transformation”). The suggestion was made to consider recognizing and working with the Roundtable on Sustainable Biomaterials in scenarios where fibers are bio based.

TEXTILE EXCHANGE RESPONSE:

Recognition of other standards is part of the long-term plan for implementing the new standards system. New raw materials will be added to the scope of the standard through the recognition of tier 4 certificates issued by recognition partners. Options for recognizing verification of specific criteria themes are also under development. In these cases, relevant audit data will be collected and stored in Textile Exchange's shared measurement system (SMS).

2. Stakeholders asked for a data collection and monitoring system, giving the example of challenges with Global Organic Textile Standard (GOTS) and Organic Cotton Standard (OCS) equivalency. Stakeholders also feel that recognized standard owners should have expectations set around data sharing, as needed.

TEXTILE EXCHANGE RESPONSE:

dTrackit will align with the Materials Matter Standard system as a traceability mechanism. Transaction Certificates (TC) and Scope Certificates (SC) issued by certification bodies for the Materials Matter Standard will be required to be uploaded to dTrackit in accordance with our current policies. These can be used to indicate conformance with the CCS during audits. In 2024, pilots will evaluate the efficacy, use-case, and practicality of various sets of tools for data collection, alongside resources designed to support users in implementing the standard. This includes testing the Monitoring, Evaluation and Learning (MEL) standard indicators and their means of collection through farm and processing facility questionnaires, as well as other scope-related tools and guidelines (e.g., ZDHC guidelines, various HR&L resources). Insights gained from these pilots will inform necessary improvements and adaptations to these tools and guidelines, as well as assess the infrastructure requirements for data collection, recording, monitoring, and reporting.

3. A stakeholder asked for clarity on how to communicate the standard to sites. Anything that updates requirements (e.g. GOTS/OCS requiring farm-level input) means a need for new resources and training for suppliers and those making the product (e.g. translations, internal structure). The concern was raised that unless Textile Exchange can support and explain the exact implications at each tier, material concentrators (traders) will not have the resources to implement this standard.

TEXTILE EXCHANGE RESPONSE:

We acknowledge the need for resources to update the producers; hence, the number of completely new requirements is kept minima compared to the current standards. Moreover, ample time is being provided for producers to become familiar with the Materials Matter Standard before it becomes mandatory. We will have also provided several resources to help producers learn about the new standard (e.g. summary papers, the mapping document, and more), along with the option to ask questions to their CB or Textile Exchange directly.

A stakeholder noted that requirements 6.1.4 to 6.5.3 in the second draft of the Materials Matter Standard were missing from the Chain of Custody for plant-based or recycled fibers and asked whether these criteria only apply to animal fibers.

TEXTILE EXCHANGE RESPONSE:

The Chain of Custody principle of the Materials Matter Standard only applies to producers of fibers that are directly certified under the Materials Matter Standard until the first processing stage (See C2.3 of the Materials Matter Standard pilot V1.0). From the first processing stage onward, the CCS will need to be implemented. For example, if a cotton ginning facility wants to include inputs in the Materials Matter Standard system, those certified inputs (under a different scheme) would need to be accepted through the recognition framework (once available) and apply the CCS instead of the Chain of Custody principle of the Materials Matter Standard.

A lot of feedback and questions were received from stakeholders on material handling, volume reconciliation, and certification requirements, including the following:

1. Regarding material handling requirements, stakeholders noted that the organization and storage requirements for certified material are extremely difficult to follow when working with a wool store. The traceability system used by wool stores is both robust and auditable, and it should be checked rather than expecting an already overwhelmed wool store to separate the bales by area. There was also concern that some requirements do not accurately reflect how wool is traded (e.g., wool sold at auction may be certified under the Responsible Wool Standard, but the purchasing organization may not be Responsible Wool Standard-certified and therefore not require a TRANSACTION CERTIFICATE).

TEXTILE EXCHANGE RESPONSE:

While criterion 6.1.1 in the Materials Matter Standard pilot V1.0 does require proper identification of certified and non-certified materials, the definition of “properly identify” is left to each organization, provided the system is internally clear to all workers. Additionally, when selling certified wool to a non-certified client, there is no need to issue a Transaction Certificate in that circumstance (as confirmed with Rod), and the chain would end at that point.

2. Stakeholders expressed concern that CCS implementation in the standard has changed from requiring only recyclers to be certified to also requiring certification for collectors. This change was not covered by any existing policies. Some agreed that collectors and concentrators should be included as entry points for certification, while others disagreed, saying that this would be too difficult to verify and only appear further down the line. There was concern that compliance demands could outweigh the desire to recycle, potentially making certification mandatory. Without such measures, textile-to-textile recycling could face significant gaps. On the other hand, others argued that post-consumer material already has gaps and that this change would increase costs and create unnecessary bureaucracy.

TEXTILE EXCHANGE RESPONSE:

We are still piloting where it would make sense to start the certified supply chain for reclaimed materials. Hopefully, through the pilot learnings, we will know whether at the collectors, concentrators, or recyclers level.

3. Regarding volume reconciliation, there were a few questions around traceability where brokers are involved and how volume reconciliation must occur to provide the utmost transparency. Furthermore, a stakeholder asked what happens if part of the supply chain is certified to the Organic Content Standard and the garment maker is certified to the Materials Matter Standard. In this instance which inter-operational systems would be needed to complete the traceability until the garment manufacturing stage.

TEXTILE EXCHANGE RESPONSE:

Any mixing of Materials Matter Standard certified materials with certified materials using a different scheme would have to go through the recognition framework (when available) to be accepted in the Materials Matter Standard system. The same would apply for any Organic Content Standard-certified materials.

4. For brand certification, a stakeholder wondered if it was allowed that the logo and certification status appear on a separate document.

TEXTILE EXCHANGE RESPONSE:

We are developing the Materials Matter Claims & Labeling Policy, which will contain all the details on how to use claims and labels by different users.

5. A stakeholder asked that we require certified organizations to only issue outgoing transaction certificates to buyers who are also certified to avoid a chain break, duplicative expenses and additional paperwork.

TEXTILE EXCHANGE RESPONSE:

We have taken note to include that specific issue for whenever the CCS is reviewed. The current CCS version refers to this issue in D5.3 and D5.5, however it is not as explicit as the stakeholder asks for.

Logo use and claims

Stakeholders asked for a Materials Matter Standard guidance document for brands to support the roll out of the standard. Stakeholders also asked whether brands will eventually be certified to the Materials Matter Standard or the CCS, how certified materials will be represented through claims and labeling, and how brands can support raw material production and first processing stages in adopting the new requirements, especially with many new requirements in land use and around HR&L.

TEXTILE EXCHANGE RESPONSE:

For brands certified to the CCS, the Materials Matter Standard will not introduce significant changes in the certification process, as sites will continue to be audited under the CCS. However, there are some updates to be mindful of. Claims and logo use will be revised to reflect the new Materials Matter logo and language, and there will be a reduced auditing scope for sites currently certified to the GRS. We plan to provide resources to support brands in the rollout of the Materials Matter Standard, including guidance on transitioning to the new claims and labeling system. This system will include an updated logo and certification label that encompasses the various materials and scopes of the standard under a clear, harmonized design, ensuring the certified material(s) in the product are clearly represented.

Some stakeholders voiced frustration about the already high number of labels on the market and strongly supported an approach to recognizing existing standards. They also flagged some of the recognition risks, including the unclear accountability of scheme owners when it comes to specific topics where criteria might slightly differ.

TEXTILE EXCHANGE RESPONSE:

We are considering a wide range of raw materials and impact areas (e.g., HR&L) to recognize verification systems, meaning that the recognition framework will include different models. The recognition model will depend on the material and the peer organization, allowing adaptability to meet different needs based on areas of alignment and opportunities for growth. In developing our claims and labeling system and exploring options to support the recognition framework for the Materials Matter Standard, we are focusing on how to acknowledge recognized programs through simplified claims that are not misleading to consumers and do not overstate certification. We are also working to align claims and labeling requirements with those of the recognized scheme and determine how to delegate claims management responsibilities to these schemes.

Principle 7 - Group Certification

Group management

Some stakeholders felt that the ICS manager and group member location requirements are very restrictive and that the dimensions of individual countries must be considered. Additional feedback noted that it is unfair that other countries in Europe are included and not Latin America. The suggestion was made that the final Materials Matter Standard include the potential partnerships to verify traceability.

TEXTILE EXCHANGE RESPONSE:

Considering the need for periodic oversight by the Group Manager to each of the group members, a straight-line distance of 500 km from the Group Manager headquarters is reasonable. Regarding the European countries included, it is due to the common EU regulations, which is different than in Latin America where each country has its own legislation.

Internal Control System

We also received extensive feedback on Internal Control System (ICS) requirements:

1. There is the concern that if the ICS manager is free to determine the level of requirement implementation, standardization might occur as each ICS manager will have their own criteria. Stakeholders asked for detailed ICS guidelines to evaluate the level of implementation and ensure conformity.

TEXTILE EXCHANGE RESPONSE:

A stakeholder misunderstood the Intent and Clarification language, which stated: "The ICS Manager is free to determine at what level the implementation of requirements is conducted, as long as conformance is demonstrated for each member of the group." This was misinterpreted as referring to the implementation level per criterion, rather than clarifying who is responsible for what, as the criterion intended. The updated wording in the Materials Matter Standard pilot V1.0 clarifies this: "The group manager ensures that all group members understand what needs to be done to meet the criteria of the standard, and that they are aware of what actions are necessary in case of non-conformity. This includes understanding the differences between the levels of conformity that apply."

2. A suggestion was made that groups should complete the internal audit before receiving their certification audit and provide the results to the certifier during the application stage. This would enable a smoother certification process. It was also suggested that responses to the farm questionnaire and GIS data be received by both the ICS and Textile Exchange.

TEXTILE EXCHANGE RESPONSE:

It is expected practice that groups complete an internal audit before undergoing their certification audit, meaning the group manager should have an established membership before requesting an official certification audit from the CB. The Group Manager is responsible for collecting questionnaires from group members and making them available to the CB, which will be then share specific information with us.

3. There was some confusion regarding the requirements for ICS traceability on products sold. Feedback suggests eliminating this requirement, citing instances where poor practices were discovered at smallholder farms, but due to a lack of traceability at the ICS level, it was impossible to determine which product shipments contained material from specific farmers because of aggregation before processing. It was suggested to retain this type of traceability requirement to facilitate product recalls if necessary and to ensure that all partners in the supply chain could learn the true origin of their fiber.

TEXTILE EXCHANGE RESPONSE:

This is reflected in criterion 6.2.1 of the Materials Matter Standard pilot V1.0.

4. Feedback on the ICS record-keeping requirements highlighted concerns related to point g) of criterion 7.2.5 in the second draft of the Materials Matter Standard. Stakeholders pointed out that commercial competition between companies at the time of purchase can prevent sheep producers from accurately reporting that other groups are certified. There is also concern that an internal auditor may not be the best person to manage these requirements. Stakeholders suggested that we obtain this information from the CB, as they typically have the most accurate and up-to-date information regarding the certifications held by producers/growers.

TEXTILE EXCHANGE RESPONSE:

The information flow should mirror the process for collecting questionnaires. The Group Manager must assume the responsibility if they wish to manage a group for certification purposes. If there are issues, such as commercially sensitive information, the certificate holder (which could be the broker) can always hire another party to act as the Group Manager to address these concerns. The alternative of directly asking the CB for this information is not feasible since CBs obtain their information through the Group Manager anyway.

5. The requirement for all group members to complete the farm questionnaire is considered very laborious by growers, who feel it is a tick box exercise. Additionally, there are concerns about privacy. Since not all growers are audited annually, the collection requirement should be extended to within 36 months. Stakeholders suggest

looking to external tools to save time and effort, as Textile Exchange currently lacks a feasible tool for group management.

TEXTILE EXCHANGE RESPONSE:

The information collected through the farm questionnaires is essential for both monitoring and evaluating the standard, as well as informing its implementation and future development. We value feedback on the system and have implemented several updates to improve usability.

6. Stakeholders were unsure whether brands could encourage suppliers to collect monitoring evaluation and learning data and share progress with them.

TEXTILE EXCHANGE RESPONSE:

If brands have an established commercial relationship with producers, they can request that kind of information directly from their suppliers. Otherwise, brands need to rely on our information.

Group member requirements

While most stakeholders support recognition, some have concerns about what happens to other Tier 4 organizations that cannot comply with the Materials Matter Standard. There was the suggestion to look at how other standards run their certification process when it comes to recognition and group member requirements.

TEXTILE EXCHANGE RESPONSE:

The recognition framework is still under development, hence we cannot offer specific details on how the program is going to be rolled out.

Stakeholders were unsure whether it is allowed to have more than one ICS location or multiple groups within a scope certificate and suggest this be made clearer.

TEXTILE EXCHANGE RESPONSE:

Criterion 7.1.1 of the Materials Matter Standard pilot V1.0 provides detailed information on this process. Key points include that the certificate holder is not necessarily the Group Manager, although it is highly recommended that both roles are managed by the same organization. A certificate holder is permitted to hold more than one certificate scope (including more than one group certificate) as long as each CS is managed by a different Group Manager, with clearly defined and established responsibilities.

Adding and removing members

Stakeholders provided some examples of what adding and removing group members may look like. For example, one asked what is required to ensure that the fiber collected from a decertified member is not mixed with the fiber from the certified members. Another asked for the standard to define what "inability to close an open nonconformity" exactly means.

TEXTILE EXCHANGE RESPONSE:

Criterion 6.1.1 requires the traceability of certified materials. The “inability to close an open nonconformity” could result from circumstances out of the farmer’s control, like a major catastrophic event, or a new legislation preventing the farmer to comply with the Materials Matter Standard.