Textile Exchange Assurance System Report

Last updated February 2019

Standard Scheme Structure

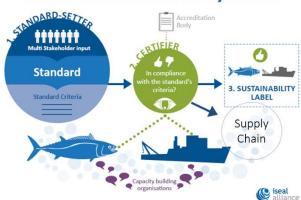
Textile Exchange standards rely primarily on third party accreditation body assessment of its authorized certification bodies. We feel this is the most credible model for certification with the least influence on certification decisions by parties with conflicts of interest.

Textile Exchange primarily creates, revises, administrates, and provides guidance for its standards. The current Textile Exchange standards are as follows:

- Content Claim Standard (CCS)
- Organic Content Standard (OCS)
- Recycled Claim Standard (RCS)
- Global Recycled Standard (GRS)
- Responsible Down Standard (RDS)
- Responsible Wool Standard (RWS)

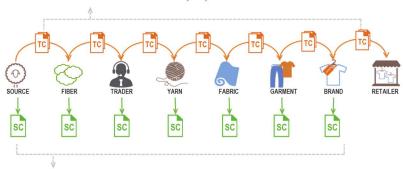
Textile Exchange does not accredit or certify anyone directly¹. Textile Exchange works with any 17011 recognized third-party accreditation body – that are first nominated by the certification body applicant – to become authorized to certify in accordance with Textile Exchange standards. Both accreditation and certification involve annual assessments and audits.

What is a Standards System?



This diagram – created by <u>ISEAL</u> – depicts this textbook model of assurance where Textile Exchange is the "Standard-Setter".

Transaction Certificates (TC)



Scope Certificates (SC)

¹ The current exception to full third party accreditation is with the Responsible Wool Standard (RWS) Farm Scope where Textile Exchange is temporarily authorizing certification bodies. As this is a brand new standard with newly created animal welfare and land requirements, Textile Exchange wants to ensure certification bodies are assessed directly by Textile Exchange in the field. Once accreditation bodies are similarly trained, Textile Exchange will transfer this responsibility to them.

Once accredited to a Textile Exchange standard, certification bodies are contracted to certify against that standard in its specific product/industry scope. Companies – that wish to be certified to a Textile Exchange standard – apply with those authorized certification bodies who then perform an initial audit. Audit teams are made up of at least one auditor and a separate certifier. The auditor performs the On-Site assessment and reports back to the certifier who makes the final certification decision. Auditors are not allowed to give advice on how to comply with requirements to their clients.

If they pass this first audit, the company is awarded a "scope certificate" for that standard and from then on are re-assessed annually for compliance. In addition to this, for every sale of certified products, the company must apply for a "transaction certificate" that represents the actual product certification. With

the transaction certificate, the buyer is then able to continue the chain of custody through the supply chain with each new buyer required to have a transaction certificate for their inputs. Final retailers that only sell to consumers are not required to receive transaction certificates.

Textile Exchange Chain-of-Custody model through certificates.

Approved accreditation and certification bodies can be found at www.TextileExchange.org/integrity.

Standards Authority

Textile Exchange has ultimate authority over its standards, including guidance and interpretation. However, International Working Groups are formed at each standard's inception or revision to manage major changes to the standard. More information can be found in the <u>TE Standard Setting Principles and Procedures</u>.

Only authorized accreditation bodies can make accreditation decisions. Textile Exchange cannot make accreditation decision.

Only authorized certification bodies can make certification decisions. Textile Exchange cannot make certification decisions.

Accreditation and Certification Requirements

The requirements for accreditation and certification bodies are detailed in the <u>TE Accreditation and</u> <u>Certification Procedures</u>. These procedures were created right after the release of and in alignment with the original <u>ISEAL Assurance Code</u>. It is structured with Textile Exchange general requirements for accreditation and certification bodies as well as requirements that are in addition to individually named ISO 17065 requirements (e.g. "In addition to 4.1.1").

Auditors are required by the procedures to be trained by their certification bodies. Accreditation bodies assess auditor experience and training during the annual assessments. Minimum requirements for

experience are set forth in the procedures in addition to ISO 17065. The exception for the RWS Farm Scope is that there is a separate set of requirements (*RWS Licensing Requirements for Certification Bodies*) for auditor experience as well as two shadow audits for the lead auditor that is performed by Textile Exchange until accreditation bodies can be authorized. Textile Exchange is currently designing a training program for our standards that will become mandatory, but are intended to supplement existing training provided by the certification bodies.

The procedures originally were scheduled to be revised in 2015, but have been pushed back to 2017 due to the implementation time burden on accreditation and certification bodies. Accreditation has less flexibility in timing of audits than a manufacturing site does with its certification. The revision began in 2017 and targeted to release in 2019. All authorized – and in process of authorization – certification bodies and accreditation bodies have been invited to provide feedback on the revision. Certified sites will be invited via Textile Exchange's contact database, Textile Exchange's website, and through their certification bodies who will be required to pass on the invitation. You can also request to join the revision by email integrity@textileexchange.org at any time.

Improvements in accreditation and certification are currently under review and will include the possibilities that our Centralized Database project (being developed in 2017) will allow far greater involvement from Textile Exchange with all parties involved with certification. This is primarily due to their direct access to a single system to share information. If you are interested in joining the next revision of any of these assurance procedures (e.g. accreditation, standard setting, complaints), please send an email to integrity@textileexchange.org.

Non-Conformities

For all Textile Exchange standards, except the RDS and RWS, certification bodies determine whether non-conformities are either major or minor (based on the descriptions given in the <u>TE Accreditation and Certification Procedures</u>), which must be corrected within 30 days and 60 days, respectively. If the non-conformities are not corrected, the company is either not awarded certification in the first year or they lose their certification and must apply again. If a site knowingly or repeatedly operates with non-conformities or purposely violates the requirements of the standard, the certification body must suspend their certification status. The company can re-apply for certification after a two-year suspension.

RDS requirements have been identified as Critical Major, Major, Minor, or Recommendation. Any Critical Major non-compliances found at any time result in immediate suspension of the company's certification and they have to correct the non-conformance within 6 months or re-apply for certification. Major non-compliances found at the time of reassessment may be corrected within 60 days, otherwise certification is suspended. Companies need only meet 50% of the Minor requirements and any non-compliances that total more than 50% at the time of reassessment can be corrected with 60 days, otherwise certification is suspended. Recommendations are not required to be met, they are best practice suggestions.

RWS animal welfare requirements have each been identified as NC-1, NC-2, or NC-3. All NC-1 requirements have to be met at the time of the audit. The timescale for corrective action is 60 days for NC-2 non-compliances and 90 days for NC-3 non-compliances.

Each RWS Land Management Requirement has been assigned as either MAJOR or MINOR. All requirements identified as Major have to be met to achieve certification. In the first year of certification, 50% of the applicable Minor requirements shall be met. For subsequent years, this score shall increase by an additional 10% until 90% or above is achieved.

The Accreditation and Certification Procedures revision plans to simplify all of the non-compliance categories and include it in the document rather than in the individual standards.

Group Certification – RDS and RWS

The RDS allows group certification by necessity as the down feather supply chain is made up of both industrial farm sites and small farm households – about 50% from each supply chain. The small farms are consuming the ducks and geese themselves and selling or trading the feathers to collectors. Due to this informal process with small farms, it was necessary to organize areas under the responsibility of groups with requirements detailed in module 4 of the RDS.

Farmers may be certified to the Responsible Wool Standard as part of a group rather than individually. Farmer groups can be cooperatives, associations, or similar organizations. The Farm Group can be self-organized and run by members, or organized by a separate entity such as a trader or broker. A farm group has to have a formal Internal Control System (ICS) in place ensuring compliance with the standard. Risk-based on-site audits of a sample of group members and audits of the ICS are carried out by Certification Bodies.

The Accreditation and Certification Procedures revision plans to simplify group certification requirements in the document rather than in the individual standards.

Feedback, Complaints, and Fraud

Should anyone wish to provide feedback or file an official complaint in regards to a Textile Exchange standard or scheme participant, information on this can be found in the $\underline{\textit{TE Standards Complaint}}$ *Procedures*.

Reports of fraud against Textile Exchange standards – usually a company unknowingly using a standards logo without being certified – can be sent to Integrity@TextileExchange.org. All logo use must be approved by the responsible certification body through a "Label Release" which is described in each standard's Logo Use and Claims Guide.

Unauthorized use of a Textile Exchange standard logo or false claim of certification may result in banning from the certification scheme or legal action in order to safeguard the credibility of the Textile Exchange Scheme(s).