

**1st revision draft of the Manual for the Implementation of the GOTS
- Working Document -**

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- Technical Committee -**

**Manual for the implementation of the
Global Organic Textile Standard**

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Table of contents

Principles.....	3
Official interpretations for specific criteria of the GOTS, Version 3.0.....	4
1.2: Scope and structure.....	4
2.1. Requirements for organic fibre production.....	4
2.3 General Requirements for chemical inputs.....	4
2.3.1 <i>Prohibited and restricted inputs in all processing stages</i>	4
2.3.2 <i>Risk phrases and toxicity requirements in all processing stages</i>	6
2.4.6 <i>Dyeing</i>	8
2.4.11. <i>Waste Water Treatment</i>	8
2.4.13. <i>Record keeping & internal quality assurance</i>	9
2.4.15 <i>Orientation values for residues in organic textiles</i>	10
2.4.16 <i>Orientation values for residues in additional materials and accessories</i>	10
3. Minimum social criteria.....	10
3.1. <i>Scope</i>	10
4.1 <i>Auditing of processing, manufacturing and trading stages</i>	11
4.2 <i>Testing of Technical Quality Parameters and Residues</i>	13

Principles

This document provides interpretations and clarifications for specific criteria of the Global Organic Textile Standard (GOTS) and related publications (e.g. the Labelling Guide) approved by the Technical Committee (TC) of the International Working Group (IWG) where the current wording of the specific criteria could lead to (or already led to) inconsistent, inappropriate or even incorrect interpretation. It may further contain requirements for the application of the GOTS and the implementation of the related quality assurance system for certifiers.

This manual is to be seen as a flexible quality assurance tool of the TC to give advice and clarification to the GOTS approved certifiers and users of the GOTS where felt necessary as it can be up-dated short-term, however it does not deal with revision questions of the current standard version or even set any revised criteria.

The interpretations, corrections and further clarifications as provided with this document are binding for all GOTS *Approved Certifiers* and users of the GOTS. Any products already assessed and certified on basis of other interpretations which were also plausible with regard to the current wording of the GOTS remain their assessed / certified status. Any new assessments and certifications must be based on the official interpretations, corrections and clarifications as provided for in this document as soon as possible but no later than 6 months after their release unless no other / specific advice is given.

Preliminary remarks:

In the following the (relevant section of a) chapter of the GOTS is quoted where the interpretations, and further clarifications refer to.

In case not the whole wording of one chapter is quoted, the symbol '...' is used.

Official interpretations for specific criteria of the GOTS, Version 3.0

1.2: Scope and structure

... "The final products may include, but are not limited to fibre products, yarns, fabrics, clothes and home textiles." ...

Interpretation:

In principle any product that can be considered as a textile fibre product is covered under the scope of this standard. The standard does not cover products made from non-fibre materials such as leather, skin, hide or rubber.

A product can only be certified and labelled ('organic' or 'made with organic') as a whole. It is not possible to certify and label only a part or component of a product.

2.1. Requirements for organic fibre production

“Approved are natural fibres that are certified organic and fibres from conversion period certified according to a recognised international or national organic farming standard by a certification body that has a valid accreditation for the recognised standard it certifies against and is IFOAM accredited or internationally recognised (according to ISO 65).” ...

Interpretation:

USDA NOP, EC 834/2007, national regulations from countries recognised on the list of third countries according to regulation EC 345/2008 (only if compliance with all relating specifications as of EC 345/2008 is assured) and standards that are approved to comply with the IFOAM Basic Standards (IBS) are considered as 'recognised international or national standards'. An organic farming standard is approved to comply with IBS if a certification body is accredited to it by the IFOAM accreditation body IOAS (as IOAS assesses whether a standard meets the ISB prior accrediting a certification body to it).

Further clarifications:

Organic fibre certification according to JAS is not possible. (-> per definition of JAS)

Certification of 'in conversion' (resp. 'in transition') status is not possible according to USDA NOP. (-> per definition of NOP)

For products labelled 'organic' or 'made with organic' according to GOTS in the USA it needs to be assured that the organic fibre production and certification is based on USDA NOP. (-> per USDA policy)

2.3 General Requirements for chemical inputs

2.3.1 Prohibited and restricted inputs in all processing stages

Substance group	Criteria
Inputs that contribute	Restricted:

Substance group	Criteria
permanent AOX to primary effluent	Prohibited are inputs containing more than 1% permanent AOX

...

and

Annex A) Definition: "AOX is permanent, if the molecular structure of the input contributes halogenated organic compounds to wastewater generated during fibre processing." ...

Interpretation:

Inputs with a total AOX content > 1% can only be approved if it is plausible from the molecular structure of the input that the permanent AOX content is < 1%.

The applicable test method for contribution of halogenated organic compounds to wastewater in this context is the norm DIN EN ISO 9562.

2.3.1 Prohibited and restricted inputs in all processing stages

Substance group	Criteria
Aromatic solvents	Prohibited
Chlorophenols	Prohibited (such as TCP, PCP)
Complexing agents and active detergents	Prohibited are: - APEO, nonylphenol, octylphenol; - EDTA, DTPA and similar persistent complexing agents; - LAS, α -MES - PFOS, PFOA
Fluorocarbons	Prohibited
Formaldehyde and other short-chain aldehydes	Prohibited
Genetically modified organisms (GMO's) and their derivatives (including enzymes derived from genetically modified organisms)	Prohibited
Biocides	Prohibited
Halogenated solvents	Prohibited
Heavy metals	Prohibited, inputs must be heavy metal free. Impurities must not exceed the limit values as defined in annex A. Exceptions valid for dyes and pigments are set in chapter 2.4.6 and 2.4.7.
...	...
Organotin compounds	Prohibited (such as DBT, MBT, TBT, DOT, TPhT)
Quaternary ammonium compounds	Prohibited. An exception valid in the dyeing process is set in chapter 2.4.6.
Substances and preparations that are prohibited with a recognised internationally or a nationally valid legal character	Prohibited
Substances and preparations having restrictions in usage with a recognised internationally or nationally	... Substances listed in regulation EC 552/2009 (amending regulation EC 1907/2006 (REACH), annex XVII), the 'candidate list of substances of very high concern for

Substance group	Criteria
legal character	authorisation' of the European Chemicals Agency (ECHA) and the restricted substance list (RSL) of the American Apparel & Footwear Association (AAFA) are prohibited.

Interpretation:

Most of the inputs listed in this sector as prohibited are banned under GOTS anyway as they do not meet the requirements related to hazards and toxicity of chapter 2.3.2. Reasons for still explicitly listing them in this chapter include public or sector specific attention to these substances.

The substances listed above are prohibited regardless if applied as pure substance or as part of a preparation.

In particular preparations are prohibited if one or more of the substances of this section are present above the concentration limit, above which the substance(s) need(s) to be declared in the MSDS prepared according to one of the equivalent norms / directives as listed in the subsequent chapter. In a given case of doubt about the applicable concentration limit, the respective GHS (Global Harmonised System) criterion is to be taken as decisive requirement.

Preparations containing substances of this section, for which the applicable norms / directives do not provide for a duty of declaration are prohibited if they contain these substances above a concentration limit of 0,1%. These substances include especially those quaternary ammonium compounds that are not classified as dangerous substances and intended to be used for other purpose than for fixing in the dyeing process as well as GMO's, their derivatives and enzymes derived from GMO's.

References:

Regulation EC 552/2009:

<http://eur-lex.europa.eu/Notice.do?val=497250:cs&lang=en&list=497250:cs.&pos=1&page=1&nbl=1&pgs=10&hwords=552/2009~>

European Chemicals Agency (ECHA), candidate list:

http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

RSL of the American Apparel & Footwear Association:

<http://www.apparelandfootwear.org/Resources/restrictedsubstances.asp>

2.3.2 Risk phrases and toxicity requirements in all processing stages

Substance group	Criteria
Inputs that are assigned to specific risk phrases related to health hazards	... Prohibited are preparations that contain at least one substance that is assigned to any of these risk phrases or combinations thereof ...

Interpretation:

A preparation is prohibited if any of the risk phrases or combinations thereof as listed in this section is assigned or may be assigned at the time of application to it or to at least one of the contained substances in case it is present above the concentration limit, above which the substance(s) need(s) to be declared in the MSDS (prepared according to one of the equivalent norms / directives as listed in this chapter). In a given case of doubt about the applicable concentration limit, the 2001/58/EEC criterion is to be taken as decisive

requirement - alternatively the equivalent GHS classifications will be considered.

References:

Global Harmonized System (GHS), 3rd revision 2009:

http://www.unece.org/trans/danger/publi/ghs/ghs_rev03/03files_e.html

Directive 67/548/EEC:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31967L0548:en:NOT>

Directive 1999/45/EC:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31999L0045:en:NOT>

Directive 2006/8/EC:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32006L0008:en:NOT>

Regulation EC 1272/2008:

[http://eur-](http://eur-lex.europa.eu/Notice.do?pos=4&hwords=1272%2F2008%7E&page=1&lang=en&pgs=10&nbl=6&list=516252.cs,500326.cs,485811.cs,486098.cs,485673.cs,496044.cs)

[lex.europa.eu/Notice.do?pos=4&hwords=1272%2F2008%7E&page=1&lang=en&pgs=10&nbl=6&list=516252.cs,500326.cs,485811.cs,486098.cs,485673.cs,496044.cs](http://eur-lex.europa.eu/Notice.do?pos=4&hwords=1272%2F2008%7E&page=1&lang=en&pgs=10&nbl=6&list=516252.cs,500326.cs,485811.cs,486098.cs,485673.cs,496044.cs)

2.3.3 Assessment basis for chemical substances and preparations

“Basis for assessment of all chemical inputs (substances and preparations) is the Material Safety Data Sheet (MSDS), prepared according to an applicable recognised norm or directive. The Approved Certifiers should, where appropriate and felt necessary, include further sources of information (such as additional toxicological and environmental data on specific components of the auxiliary agents, test reports and independent lab analysis) in the assessment.

Certifiers with approval for this specific scope are authorised to issue conformity documents to the chemical supply industry listing the trade names of preparations that have been assessed and found to be compliant with the criteria of this standard.

All chemical inputs must have been approved by a GOTS Approved Certifier prior to its usage.”

Interpretation:

“Applicable recognised norms or directives” according to which a MSDS of a chemical input (substance or preparation) has to be prepared in this context are:

- ANSI Z400.1-2004
- ISO 11014-1
- 1907/2006EEC (Reach)
- 2001/58/EEC
- GHS (Global Harmonised System)
- JIS Z 7250:200, Part 1

“Certifiers with approval for this specific scope” in this context are those Approved Certifiers authorized for the scope: “Approval of textile auxiliary agents (chemical inputs) on positive lists” (= scope 4 of the ‘Approval Procedure and Requirements for Certification Bodies’, chapter 4.2). The actual approval status of the certifiers can be checked on the website: <http://www.global-standard.org/certification/approved-certification-bodies.html>

Certifiers with approval for this scope are obliged to make their lists of approved chemical inputs available to all Approved Certifiers. The lists are to be taken as applicable tool for input assessment in the GOTS certification scheme by all Approved Certifiers. In case of conflicting decisions (product approved by one that is declined by another certifier), certifiers are requested to achieve consistent assessment by sharing their proofs of assessment. If this fails in last instance the Technical Director / Technical Committee of the IWG decides after screening the provided technical information on the chemicals in question.

2.4.6 Dyeing

Parameter	Criteria
Selection of dyes and auxiliaries	... Prohibited are azo dyes that release carcinogenic amine compounds (MAC III, category 1,2,3) Prohibited are (disperse) dyes classified as allergenic. ...

Specification:

Azo dyes MAC III, category 1 (with CAS no):

4-Aminobiphenyl (92-67-1)	2-Naphthylamine (91-59-8)
Benzidine (92-87-5)	o-Toluidine (59-53-4)
4-Chloro-o-toluidine (95-69-2)	

Azo dyes MAC III, category 2 (with CAS no):

o-Aminoazotoluene (97-56-3)	4,4'-Methylene-bis-(2-chloroaniline) (101-14-4)
2-Amino-4-nitrotoluene (99-55-8)	4,4'-Oxydianiline (101-80-4)
p-Chloroaniline (106-47-8)	4,4'-Thiodianiline (139-65-1)
2,4-Diaminoanisoole (615-05-4)	2,4-Toluyldiamine (95-80-7)
4,4'-Diaminobiphenylmethane (101-77-9)	2,4,5-Trimethylaniline (137-17-7)
3,3'-Dichlorobenzidine (91-94-1)	o-Anisidine (90-04-0)
3,3'-Dimethoxybenzidine (119-90-4)	2,4-Xylidine (95-68-1)
3,3'-Dimethylbenzidine (119-93-7)	2,6-Xylidine (87-62-7)
3,3'-Dimethyl-4,4'-diaminobiphenylmethane (838-88-0)	4-Aminoazobenzene (60-09-3)
p-Cresidine (120-71-8)	

Azo dyes MAC III, category 3 (with CAS no):

5-Chloro-2-methylaniline (95-79-4)	p-phenylenediamine (106-50-3)
N,N-Dimethylaniline (121-69-7)	

The following disperse dyes are prohibited (because of their allergenic potential):

Blue 1	Orange 1	Violet 93
Blue 3	Orange 3	Yellow 1
Blue 7	Orange 37	Yellow 3
Blue 26	Orange 76	Yellow 9
Blue 35	Orange 149	Yellow 23
Blue 102	Red 1	Yellow 39
Blue 106	Red 11	Yellow 49
Blue 124	Red 15	Yellow 54
Blue 291	Red 17	Yellow 64
Brown 1	Violet 1	

2.4.11. Waste Water Treatment

“Wastewater from all wet processing sites must be treated in an internal or external functional wastewater treatment plant before discharged to surface waters.” ...

Interpretation:

The question whether a treatment plant is functional or not mainly depends on the inputs used in wet processing. For a unit only performing dyeing with natural dyes and auxiliaries, a simple biological treatment system may be appropriate whereas for an industrial unit working with chemical dyes and auxiliaries at least a 2-stage treatment plant is requested. Units using

auxiliaries that are approved because of its adequate eliminability (e.g. acc. to OECD 302B) must in addition have a functioning treatment of the sludge.

... “Wastewater from wool scouring sites must, when discharged to surface waters after treatment (whether on-site or off site), have a COD content of less than 45 g/kg greasy wool.
... Wastewater from all other wet-processing sites must, when discharged to surface waters after treatment (whether on-site or off site), have a COD content of less than 20 g/kg of textile output expressed as an annual average.” ...

Clarification:

The applicable test method for COD determination is ISO 6060.

The applicable calculation method in this context is as following:

$$(C/1000) \times (V \times 1000) / (P \times 1000) = \dots\dots\dots \text{COD g/kg}$$

with:

C (in mg/l) = COD concentration in water discharged to surface waters after treatment

V (in m³) = Volume of water discharged in the calculation period

W (in ton) = Weight of textile output in tonnage in the calculation period

... “The copper content must not exceed 0,5 mg/l.” ...

Clarification:

The applicable test method to determine copper in wastewater is ISO 8288.

2.4.13. Record keeping & internal quality assurance

... “Certified Entities purchasing organic fibres must receive and maintain transaction certificates (=certificates of inspection), issued by a recognised certifier and certified in accordance with the criteria of chapter 1.4 for the whole quantity purchased.

Certified Entities purchasing GOTS Goods must receive and maintain a proof on the GOTS certified status (e.g. transaction certificate) issued by an Approved Certifier for the whole quantity of GOTS Goods purchased.” ...

Interpretation:

Transaction Certificates (TCs) for 'organic' or 'organic in conversion' fibres and GOTS Goods shall contain the following minimum information:

- a. Name and address of the Certification Body that issued the certification;
- b. Name(s) and address(es) of the producer(s) / processor(s) of the certified products;
- c. Name and address of the consignee of the certified products;
- d. Name and address of the exporter of the certified products, if applicable;
- e. Name and address of the importer of the certified products, if applicable
- f. The scope of the certification granted, including
 - The products certified, which may be identified by name and type and further be specified by net (and gross) weight, no. of pieces, length and codes or numbers (s.a. lot no., container no., bill of lading), whatever applicable
 - The fibre material composition of the products certified, if applicable
 - The basis for the certification:
 - It must be clarified that fibre production was certified according to a recognised organic farming standard as defined in chapter 2.1; TCs for GOTS Goods issued to importers or other entities in the US must explicitly carry the information, if the fibre production was

certified according to USDA NOP)

- GOTS must be mentioned as basis for processing certification

- The certified status of the fibres ('organic' or 'organic-in conversion') resp. label grading of the GOTS Goods ('organic' resp. 'organic-in conversion' or 'made with (x%) organic materials' resp. 'made with (x%) organic-in conversion materials'), and
- The effective date of certification.

Transaction Certificates (TCs) for organic (or organic 'in conversion') fibres should reflect the interpretation and clarifications as provided for chapter 2.1 of GOTS in this document. TCs for GOTS Goods issued on basis of an organic production standard or another processing standard cannot be accepted in the GOTS supply chain.

2.4.15 Orientation values for residues in organic textiles

and

2.4.16 Orientation values for residues in additional materials and accessories

...

Parameter	Test method	Criteria
...
Glyoxal and other short-chain aldehydes	Extraction, HMBT, Photometry UV/VIS	< 20 mg/kg
...		

Interpretation:

Aldehydes up to carbon no. 6 and both mono- and dialdehydes are considered as 'short chain aldehydes' in this context.

Since the prescribed method (photometry UV/VIS) is not appropriate to experimentally determine a detected aldehyde, a specific method for the short chain aldehydes and glyoxal such as GC/MS and LC/MS should be used.

3. Minimum social criteria

3.1. Scope

... "For adequate implementation and assessment of the following specific criteria the corresponding key conventions of the International Labour Organization (ILO) have to be taken as the relevant basis for interpretation."

Interpretation:

The following ILO conventions 'correspond' to the specific GOTS minimum criteria:

- 3.2. Employment is freely chosen:
 - C29 - Forced Labour Convention
 - C105 - Abolition of Forced Labour Convention
- 3.3. Freedom of association and the right to collective bargaining are respected:
 - C87 - Freedom of Association and Protection of the Right to Organise Convention

- C98 - Right to Organise and Collective Bargaining Convention
- C135 - Workers' Representatives Convention
- C154 - Collective Bargaining Convention
- 3.4. Working conditions are safe and hygienic:
 - C155 - Occupational Safety and Health Convention
- 3.5. Child labour must not be used:
 - C138 - Minimum Age Convention
 - C182 - Worst Forms of Child labour Convention
- 3.6. Living wages:
 - C95 - Protection of Wages Convention
 - C131 - Minimum Wage Fixing Convention
- 3.7. Working hours are not excessive:
 - C1 - Hours of Work (Industry) Convention
 - C14 - Weekly Rest (Industry) Convention
 - C30 - Hours of Work (Commerce and Offices) Convention
 - C106 - Weekly Rest (Commerce and Offices) Convention
- 3.8. No discrimination is practised:
 - C100 - Equal Remuneration Convention
 - C111 - Discrimination (Employment and Occupation) Convention
- 3.9. Regular employment is provided
 - C158: Termination of Employment Convention
 - C175: Part-time Work Convention
 - C177: Homework Convention
 - C181 Private Employment Agencies Convention
- 3.10. Harsh or inhumane treatment is prohibited:
 - C100 - Equal Remuneration Convention
 - C111 - Discrimination (Employment and Occupation) Convention

Reference:

The mentioned conventions are published on the official ILO website:
<http://www.ilo.org/ilolex/english/convdisp1.htm>

4.1 Auditing of processing, manufacturing and trading stages

“Operators from post harvest handling up to garment making and final packing as well as traders of GOTS Goods must undergo an on-site annual inspection cycle (including possible unannounced inspections) and must hold a valid operational certificate.” ...

Interpretation:

Depending on the kind of the organic fibre processed the following post harvest handling stages are considered as the first processing stages that must be GOTS certified:

- Ginning for cotton
- Retting for bast fibres
- Boiling and washing cocoons for silk
- Scouring for wools and other animal fibres

Approved Certifiers that have contracted more than 10 GOTS Certified Entities must conduct a minimum of 2% unannounced on-site inspections (or 1 inspection; whichever is greater) of certified facilities per year, chosen randomly and/or chosen taking into account the risk or threat to the organic integrity of the production or products.

The on-site inspection protocol shall at the very minimum undertake the following, as applicable to the operator:

- a. Assessment of the processing system by means of visits to facilities and storage units (which may also include visits to non-organic areas if there is reason for doing so);
- b. Review of records and accounts in order to verify flow of goods (input/output reconciliation and the tracing back);
- c. Inspection of the chemical inputs (dyes and auxiliaries) and accessories used and assessment of their compliance with the applicable criteria of the GOTS;
- d. Identification of areas of risk to organic integrity;
- e. Inspection of the waste water (pre-)treatment system of wet processors;
- f. Verification of the operator's risk assessment of contamination and residue testing policy potentially including sample drawing for residue testing either as random sampling or in case of suspicion of contamination or non-compliance;
- g. Verification of adherence to the defined minimum social criteria (including confidential interviews of workers, if applicable);
- h. Verification that changes to the standards and to related requirements have been effectively implemented and
- i. Verification that corrective actions have been taken.

Operational Certificates (= scope certificates) shall contain the following minimum information:

- a. The name and address of the operator whose products are the subject of certification;
- b. Name and address of the Certification Body that issued the certification documents;
- c. The scope of the certification granted, including
 - The products certified, which may be identified by type or range of products,
 - The standard that is the basis for the certification (=GOTS), and
 - The effective date and term of certification.

...”The responsible Approved Certifier may further decide on exceptions from the annual onsite inspection cycle for small-scale sub-contractors with a low risk potential regarding environmental and social criteria.” ...

Interpretation:

Operators employing not more than 10 workers / employers can be considered as ‘small-scale’ in this context. Units performing wet processing can generally not be considered as having a ‘low risk potential’ regarding environmental criteria whereas processors and manufacturers employing workers in developing countries as well as garment manufacturers can generally not be considered as having a ‘low risk potential’ regarding social criteria.

Accordingly Approved Certifiers may decide on exceptions from the annual onsite inspection cycle for units with no more than 10 employers performing job work for a certified entity such as home based working units and mechanical processing units in developed countries.

... “Basis for authorisation by the IWG is an accreditation of the certifier on basis of the IWG document ‘Approval Procedure and Requirements for Certification Bodies’ by the main co-operation partner of IWG for this process, IOAS, or another recognised accreditation body”.

Interpretation:

A general precondition for accepting application as GOTS Approved Certifier is an existing ISO 65 accreditation of the applicant (according to chapter ‘2. Principles’ of the ‘Approval Procedure and Requirements for Certification Bodies’). Beside IOAS authorised national or international accreditation bodies (such as IAF member) that have the necessary competence and confirm to the IWG that they follow the given procedures to accredit to the GOTS scope(s) are considered as ‘recognised accreditation bodies’.

4.2 Testing of Technical Quality Parameters and Residues

“The licensed operator is expected to undertake testing in accordance with a risk assessment in order to assure compliance with the criteria of chapter 2.4.14 (Technical Quality Parameters) as well as 2.4.15 and 2.4.16 (Orientation Values for Residues in GOTS Goods, additional materials and accessories). All products certified according to this standard and the components of such products should be included in this risk assessment and therefore potentially subject to testing. The testing frequency and the number of samples should be established according to this risk assessment.” ...

Interpretation:

Factors that should be considered – if applicable - in an appropriate risk assessment analysis:

- Kind of organic fibres used <-> pesticides and potential GM varieties commonly used if the same type of fibre would have been sourced conventional.
- Kind of additional conventional fibres and accessories used <-> pesticides and potential GM varieties commonly used in the case of natural fibres, prohibited additives commonly used for regenerated and synthetic fibres as well as accessories
- (Organic) natural fibre claims <-> non natural substitutes used (e.g. natural bamboo fibre <-> rayon made from bamboo; linen and hemp <-> synthetic imitation fibres)
- Type and amount of approved chemical inputs used for GOTS Goods <-> any fastness problems known, problematic restricted inputs contained (e.g. AOX, copper) as well as prohibited substances commonly used in the same conventional process
- Separation measures in processing <-> sources of potential contamination from the parallel conventional processing stages performed in the unit
- Transport and storage conditions of GOTS goods<-> prohibited substances commonly used in transport and storage of comparable conventional products