TRADE DEVELOPMENT AUTHORITY OF PAKISTAN

Ministry of Commerce

STEP-BY-STEP GUIDE FOR NEW EXPORTERS

Part B: Certification Requirements for Textiles & Leather Exports to European Union

October 2023

DISCLAIMER

The purpose of this Handbook is to bring together in a convenient place a summary of the certification requirements for the assistance of existing, new, and potential exporters, businessmen, manufactures and SMEs. Every individual making the decision to export should read this handbook and become familiar with the basics of certification requirements required. This handbook is an effort to consolidate the certification requirements for apparels in European Union. If the document does not address your specific query, the readers are advised to visit the official website/ office of the relevant authorities for detailed consultation/ guidance on the matter.

The information in this document has been furnished and consolidated until 30th October, 2023. The readers are advised to keep track of the latest developments. However, TDAP also expects to revise and update this handbook from time to time.

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Table of Contents

CERTIFICATION REQUIREMENTS FOR TEXTILES & LEATHER EXPORTS TO EUROPEAN UNION

Textiles Classification in EU

According to the EU textile regulations (Article 3(1)(a)):

"Textile products are any raw, semi-worked, worked, semi-manufactured, manufactured, semi-made-up or made-up product which is exclusively composed of textile fibers, regardless of the mixing or assembly process employed."

The following products are also treated as textile products.

  a) Products containing at least 80% by weight of textile fibers.

  b) Products incorporating textile components which then form an integral part of the product.

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1. INTRODUCTION

There are several mandatory requirements that exporters to the European market are required to comply with including both legal and non-legal requirements. There are also some special requirements that apply only to certain niche markets. Although non-legal requirements are not enforced by the custom union yet exporters have to fulfill some specific non-negotiable terms and conditions as required by buyers (i.e. renowned brands) in Europe. Fulfilling mandatory requirements grants exporters with an access to EU market but meeting other voluntary requirements to target niche markets can give exporters a competitive advantage in the European market.

Legal Requirements	General Product Safety
	REACH Compliance
	Special req. for Children wear
	CE Marking
	EU Textile Labelling Rules
	Biocides Registration
	CITES
	Intellectual Property Protection
Non-Legal Requirements	Corporate Social Responsibility
	Standards for Base Materials
	Standards for Textile Processing and Fabrics
	Standards for Garment Manufacturing Industry
	Acceptable Quality Limit
Special Requirements for Niche Markets	Apparel made from recycled materials
	Vegan Apparel
	Children's & Baby Wear
	Pet Clothing
	Work Wear
	Corporate Wear
	High Performance Wear
	Medical & Adaptive Apparel
	Swimwear
	Sustainable Leather/ Leather Standards

2. MANDATORY LEGAL REQUIREMENTS FOR APPARELS & LEATHER

The mandatory legal requirements include product safety, the use of chemicals (REACH), quality standards, CE marking, Biocides, CITES, labelling requirements, and intellectual property protection etc.

2.1. Product Safety Requirement

Any item on sale in Europe must comply with the EU's General Product Safety Directive (GPSD) 2001/95/EC[1]. The GPSD is applicable to both textile & apparel products, and leather products, including furniture, shoes, and bags. Apart from these general directives, there are also specific safety requirements for certain textile and apparel products. These product-specific requirements take precedence over the GPSD. National governments have been authorized to check if the product exported meets the applicable safety requirements or not. In case, if the product is considered unsafe or fails to comply with the GPSD, it can be rejected at customs, withdrawn from the European market, and can even be banned from marketing in Europe.

- In case, if the buyer has supplied the product design, it is his/ her responsibility to make sure that the product is legally safe for consumers to use.
- In case, if there are no pre-defined regulations or EU standards, the product's compliance is determined in accordance with other reference documents i.e. National Standards, Commission recommendations, or Codes of Practice etc.

2.2. Chemical Substances (REACH)

REACH stands for registration, evaluation, authorization and restriction of chemicals. This regulation restricts the use of a large selection of chemicals in textiles and leather. The use of these chemicals in apparel is either restricted by limits in weight (usually measured in mg or kg) or prohibited altogether[2] *[see Appendix -1 for REACH compliance & lab testing guidelines]*.

Some EU countries have additional national regulations regarding specific chemicals. For example, Austria, Finland, Germany, Norway and the Netherlands have specific regulations for formaldehyde in textiles; Austria, Denmark, Germany and the Netherlands also have specific regulations for PCP, while Germany also has regulations for disperse dyes in textiles.

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[1] General Product Safety https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0095&from=EN
[2] Substances restricted under REACH https://echa.europa.eu/substances-restricted-under-reach

Switzerland even has its own regulations on chemicals titled as "Swiss Chemical Risk Reduction Ordinance - ORRChem"[3].

Many fashion brands and retailers have formulated restricted substances lists (RSLs)[4] of their own, which are stricter than REACH. Exporters will have to comply with these buyer-specific RSLs if they want to do business with such brands/ retailers. Buyer-specific RSLs are often in pursuance of the Zero Discharge of Hazardous Chemicals (ZDHC) guidelines[5] on safe chemicals use. The ZDHC is a foundation that came out of the 2011 with campaign titled 'DETOX MY FASHION' by Greenpeace. It aims at safer chemical management practices in the apparel industry[6].

2.2.1. REACH restricted chemicals commonly used in textiles and leather production

The following list contains the most commonly used chemicals in apparel production that are restricted by REACH. The chemicals listed below are grouped in terms of their most common use in the apparel production process, leather wallets, gloves, shoes, jackets, furniture covers and other related products.

- **Restricted chemicals in dyestuffs:** Azo dyes, which may release one or more of the 22 aromatic amines listed in Appendix 8 to the REACH regulation[7], nonylphenol and nonylphenol ethoxylates, and heavy metals, such as mercury, cadmium and lead.

- **Restricted flame retardants:** Tris (2,3-dibromopropyl) phosphate, tris (aziridinyl) phosphinoxide, and polybrominated biphenyls (PBB).

- **Restricted waterproofing and stain-repelling chemicals:** Perfluorooctane sulfonic acid and its derivatives (PFOS) were originally restricted under REACH, but are now restricted under the Stockholm Convention (see persistent organic pollutants below).

- **Restricted biocides or preservatives:** Di-octyltin (DOT) compounds, tributyltin (TBT) compounds, and pentachlorophenol (PCP).

- **Restricted compounds in metal trims and accessories (zippers, buttons and jewellery):** Nickel.

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[3] Swiss Chemical Risk Reduction Ordinance (ORRChem) List
https://www.chemsafetypro.com/Topics/CH/Siwss_Chemical_Risk_Reduction_Ordinance_ORRChem.html
[4] Restricted Substances Lists (RSLs) https://mrsl.roadmaptozero.com/MRSL2_0
[5] ZDHC Conformance Guide https://uploads-ssl.webflow.com/5c4065f2d6b53e08a1b03de7/5e8de0a3c5077cd5d6846799_Conformance_Guidance_V1_1.pdf
[6] ZDHC Principles & Procedures https://uploads-ssl.webflow.com/5c4065f2d6b53e08a1b03de7/5db6e90231f45327039998f7_ZDHC_MRSL_Principles_and_Procedures.pdf
[7] List of 22 aromatic amines https://echa.europa.eu/appendix-8-list-of-aromatic-amines

- **Restricted chemicals in plastic or PVC parts:** Polycyclic-aromatic hydrocarbons (PAHs), and phthalates.
- **Restricted chemicals in leather:** Chromium VI
- **Persistent organic pollutants[8]**: POPs are sometimes used to make textiles waterproof or flame-retardant, or to finish leather. Restricted POPs include short-chain chlorinated paraffins (SCCP).

2.3. Special Requirements for Children's Wear

The EU has a specific standard for the safety of children's wear. Regulation (EN 14682:2014) covers all children's clothing including disguise costumes and ski apparel up to 14 years of age. The aim of this requirement is to minimize the risk of accidental entrapment, strangulation and choking hazards by cords or drawstrings on children's clothing.

2.4. CE Marking

CE marking is compulsory for any product sold in the European Economic Area (EEA) either produced/ manufactured inside or outside the EU. By affixing the CE marking to a product, a manufacturer declares that the product has been assessed and meets all the legal requirements (i.e. high safety, health, and environmental protection requirements) for CE marking and can be sold in Europe.

For instance, if an exporter wants to export personal protective equipment (PPE)[9] to the EU, e.g. safety garments or gloves[10],[11]. He/ She will have to comply with specific EU safety

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[8] The use of persistent organic pollutants (POPs) is also restricted, although in most cases not by REACH but by the Stockholm Convention (EU Regulation 2019/1021).

[9] CE Marking for PPE products https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0425

[10] PPE gloves' EN standards under PPE
        EN 420 Protective Gloves – General Requirements
        EN 388 Protective Gloves against Mechanical Use
        EN 12477 Welders Gloves
        EN 407 Protective Gloves against Thermal Risks
        EN 659 Protective gloves for firefighters
        EN 13594 Protective gloves for motorcycle riders
        EN 511 Protective gloves against cold
        EN 60903 Protective gloves against High voltage
        EN ISO 10819 Protective glove against mechanical vibration
        EN 1082 parts 1-3 Protective glove against Hard knives
        EN 281 Part 4 Protective glove against chainsaws

[11] EU Standards for Gloves - https://www.hsimagazine.com/article/european-glove-standards-1164/

standards for the design, manufacturing, material use, testing, and user instructions concerning PPE. Exporters are obligated to affix CE marking to PPE as a visible indication that your product conforms with the PPE safety requirements. The rules and regulations for affixing CE marking have been published in

"The 'Blue Guide'[12] on the implementation of EU products rules 2016 *[see Appendix - 2 for CE Marking guidelines (Apparel)]*.

2.5. EU Textiles Labeling Rules

According to EU Textile and clothing regulation 1007/2011[13], products have to be labeled or marked whenever they are available on the market. Exporter/ Manufacturer must specify the material content of every item of apparel that he/she exports to the EU. The purpose of this regulation is to let consumers know what type of apparel they are buying. Some of the labelling information is summarized hereunder:

a) **Full fiber composition** must be labeled on textile products. Some of the common fibers and attribute in the textile industry are:

   o Silk (smooth fabric finish with high shine)
   o Wool (Warmth)
   o Nylon (Durable, Strong, lightweight, dries quickly)
   o Polyester (Durable, Strong, lightweight, dries quickly)
   o Cotton (Lightweight, absorbent)
   o Spandex (Elastic, strong, lightweight)

b) The label should be **placed/ affixed** permanently on textile products. Take an example of a T-shirt, the label is usually affixed on the inner side of the product. In general, textile products must carry a durable, legible, easily visible and accessible label, either on the product or on its packaging.

c) **Non-textile parts of animal origin** must be clearly labeled (such as fur or leather)[14].

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[12] EU's Blue Guide on product rules (see pages 58-64 for CE marking) https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016XC0726(02)&from=BG
[13] EU Textiles Labelling Regulations https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32011R1007
[14] Study Report - Labelling Leather
https://ec.europa.eu/docsroom/documents/11364/attachments/1/translations/en/renditions/pdf

d) The label **should not contain abbreviations** with the exception of mechanized processing codes.

e) **Care instruction labeling** is not required under EU textiles regulation. Nonetheless, consumers expect it and the EU may find manufacturers liable for defective products in the absence of care labelling. Alternatively, ISO 3758: 2012[15] standard can also be preferred for care labelling. The care label symbols are property of the company GINETEX[16]. If you export to countries like Belgium, Luxembourg, France or Switzerland, you need to pay a fixed compensation/ fee to GINETEX for the use of these symbols. Many EU buyers nominate label suppliers, to prevent differences in quality and colour. So, before ordering the labels, exporters must coordinate with the buyers for specific labelling requirements.

f) The harmonization of the **size system** is covered by a European voluntary standard EN13402[17] on size designation of clothes. However, size labeling on textile products is not covered and there is no obligation to apply the standard.

g) **Manufacturer identification** is not required.

h) In the European Union, there is no such obligation for providing **Country of Origin** on the label. However, if you choose to state the Country of Origin on the label, it must not be misleading to consumers. It should be clearly labeled.

i) The information on the label should be written in the **official languages** of the EU country where the textile will be marketed. For example, the product will be labelled in German as it is the official language in Germany.

2.6. Biocides Registration

The Biocidal Products Regulation (BPR, Regulation (EU) 528/2012)[18] concerns the placing on the market and use of biocidal products, which are used to protect humans, animals, materials or articles against harmful organisms like pests or bacteria, by the action of the active substances contained in the biocidal product. This regulation aims to improve the functioning of the biocidal products market in the EU, while ensuring a high level of protection for humans

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[15] Textiles – Care Labelling Standard https://www.iso.org/standard/42918.html
[16] Ginetex https://www.ginetex.net/
[17] Size Labelling - https://en.wikipedia.org/wiki/Joint_European_standard_for_size_labelling_of_clothes
[18] BPR Regulation (EU) No 528/2012 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012R0528&from=EN

and the environment. If exporters add biocides to textiles, he/ she will have to comply with the EU's Biocidal Product Regulations (BPR)[19] as well as REACH. *[see Appendix – 3 for Biocides Registration guidelines]*

2.7. CITES

The use of endangered species of animals and plants or parts thereof in exported products is restricted by the EU wildlife regulatory measures EC 338/97[20]. This regulation is based on the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)[21]. Some species of animals and plants are excluded from use in apparel altogether, so you cannot use them in your products[22]. Others are subjected to severe importing restrictions.

2.8. Intellectual Property Rights

The illegal copying of registered apparel trademarks and designs is considered a serious threat to the European fashion industry. If you are selling your own designs on the European market, you must make sure that you are not violating any intellectual property (IP) rights. These rights may apply to the design of the product as well as to any trademarks or images used. If your buyer provides the design, they will also be liable in case the item is found to violate an intellectual property right.

EU's Intellectual Property Office (EUIPO) is the registering body for designs[23] and trademark[24] protection within the EU. Exporters can register their IP or Trademark online[25] at the cost of €350 for 5 years protection. However, for international protection and registration 'World Intellectual Property Organization (WIPO)[26]' can also be referred to, which protects your design in 192 countries.

- If you want to protect your design in the EU without paying registration fee, an unregistered community design (UCD)[27] can also be used, which provides protection from copying only for a period up to three years. In this case, your design is automatically protected without any formality/ fee after it is first publicly disclosed (which means it has to be published, used in trade, be part of an exhibition or somehow

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[19] Understanding BPR https://echa.europa.eu/regulations/biocidal-products-regulation/understanding-bpr
[20] Council Regulation (EC) No 338/97 https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:31997R0338
[21] CITES Appendices https://cites.org/sites/default/files/eng/app/2020/E-Appendices-2020-08-28.pdf
[22] How CITES works https://www.cites.org/eng/disc/how.php
[23] EUIPO Design - https://euipo.europa.eu/ohimportal/en/design-definition
[24] EUIPO Trademark - https://euipo.europa.eu/ohimportal/en/trade-marks-examples
[25] Register Online at EUIPO - https://euipo.europa.eu/ohimportal/en/rcd-route-to-registration
[26] WIPO website - https://www3.wipo.int/designdb/en/index.jsp
[27] UCD Basics - https://www.mewburn.com/law-practice-library/uk-eu-unregistered-designs-the-basics

become reasonably known in the apparel sector). However, the scope of qualified persons for UCD is very limited.

3. MANDATORY NON-LEGAL REQUIREMENTS FOR APPARELS & LEATHER

3.1. Corporate Social Responsibility

The buyers in Europe more often demand active engagement of suppliers/ manufacturers in Corporate Social Responsibility (CSR). General practice is that exporters might have to:

- Sign a code of conduct that you respect local labour and environmental laws and avoid corruption.

- Get a certification concerning the origin of the fibres in the fabrics you use, or the wages you pay to your factory workers, or the way you manage your factory waste etc.

- Go through rigorous testing for REACH compliancy, and anything from tear force to colour fastness etc.

- Reduce carbon footprint and chemical use to a minimum or select suppliers that do.

- Measure the environmental impact of your production process, ensure a living wage, minimum wage, and safe working environment for your employees etc.

3.2. Non-legal requirements for base materials

The production of base materials (fibres and non-textiles, like leather, fur and down) has impact on water, chemical and energy use and a negative impact on human and animal welfare. In order to mitigate these risks, manufacturers are advised to source their base materials from certified suppliers. The following standards and certifications are the most common in the European market:

- **BCI (Better Cotton Initiative).** A multi-stakeholder initiative with 1,200 members that helps to improve cotton growing conditions globally. *[see Appendix – 4 for BCI guidelines]*

- **GRS (Global Recycled Standard).** Product standard that incorporates recycled material verification, including social and environmental responsibility criteria, as well as chemical management. *[see Appendix – 5 for GRS guidelines]*

- **RDS (Responsible Down Standard) and RWS (Responsible Wool Standard).** Third-party verified standards that guarantee animal welfare criteria have been met for animals that are kept for their down or wool, including respect for the Five Freedoms. *[see Appendix – 6 for RDS guidelines]*
  [see Appendix – 7 for RWS guidelines]

3.3. Non-legal requirements for textile processing and fabrics

The following standards and certifications may be requested to guarantee that textiles and fabrics have been produced with respect for the environment. Most of the European brands and retailers require standards such as Oekotex, EU Ecolabel, GOTS, and Bluesign etc.

- **Standard 100 by Oekotex** – ensures consumers that all materials used in a garment are tested for harmful substances. *[see Appendix – 8 for* **Standard 100** *guidelines]*
- **EU Ecolabel** – ensures consumers that textiles are made using less harmful substances, energy and water. *[see Appendix – 9 for EU Ecolabel guidelines]*
- **GOTS (Global Organic Textile Standard)** – GOTS covers everything from the production to the distribution of textiles made from at least 70% organic natural fibres. *[see Appendix – 10 for GOTS guidelines]*
- **Bluesign** – The Bluesign System reduces impact on people and the environment in the entire textile supply chain, based on input stream management. *[see Appendix – 11 for Bluesign guidelines]*

3.4. Non-legal requirements for garment manufacturing

Several standards and certifications in the textile industry aim to encourage fair treatment of workers in garment manufacturing. Here are some of the most requested standards by European buyers.

- **Business Social Compliance Initiative (BSCI)**. For many European buyers, BSCI is the most popular and often only certification they will require. It is a supply chain management system that helps manufacturers drive social compliance. *[see Appendix – 12 for BSCI Compliance Initiative]*
- Especially in the UK, the following social and environmental standards are popular:
  - Worldwide Responsible Accredited Production (WRAP) *[see Appendix - 13]*
  - Supplier Ethical Data Exchange (SEDEX) *[see Appendix - 14]*
  - Ethical Trade Initiative (ETI) *[see Appendix - 15]*

- Other popular standards that guarantee apparel are made with respect for workers' rights are:
  - SA8000[28]
  - ISO 26000[29]
  - FWF (Fair Wear Foundation)[30]
  - Fairtrade[31]
  - ISO 14001 (Environmental Management Standard)[32]

3.5. Acceptable Quality Limit

To guarantee product quality, buyer/ importer may set an AQL (Acceptable Quality Limit). This refers to the quality level that is the worst tolerable. For instance, AQL 2.5 means that your buyer will reject a batch if more than 2.5% of the whole order quantity over several production runs is defective.

Customers also set the product quality standard defining the level of physical standards, such as:

- pilling
- colour fastness
- tear force
- shrinkage

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[28] Social Accountability International - https://sa-intl.org/programs/sa8000/
[29] Social responsibility - https://www.iso.org/iso-26000-social-responsibility.html
[30] Fair Wear - https://www.fairwear.org/
[31] Fair Trade - https://www.fairtrade.net/
[32] Environmental Management - https://www.iso.org/iso-14001-environmental-management.html

4. SPECIAL REQUIREMENTS FOR NICHE MARKETS

Niche markets are markets that have a specific target group with special requirements, i.e. low order quantities, specific dying processes, tech add-ons and special fabrics. Due to such special requirements, most mainstream exporters don't target this group. However, the trend is changing as more and more European buyers now prefer high valued quality products. When entering the high-opportunity niche markets, exporters should expect very specific requirements from the buyers including:

- **Apparel made from recycled materials**

Yarns and fabrics made from recycled cuttings and post-consumer waste are becoming increasingly popular — and not just with brands and retailers that promote themselves as sustainable. The most asked-for standards here are the **Textile Exchange's Recycled Claim Standard** and **Global Recycled Standard**.

- **Vegan apparel**

In the wake of a rising demand for vegan food in Europe, apparels made without using materials from animal origin is a small but fast-growing niche. If you use plant-based or synthetic alternatives to materials such as leather or wool, you can apply for the **PETA-Approved Vegan certification**[33].

- **Children's and baby wear**

Use of organic cotton is especially popular in baby and children's wear, as many parents are willing to pay extra for materials that are grown without the use of chemicals. **GOTS** is a popular standard for children's wear. Remember that children's wear also needs to comply with EU Regulation regarding the safe attachment of drawstrings and accessories *(see Special Requirements for Children's Wear above)*.

- **Pet clothing**

The manufacturing of pet clothing requires no compliance with specific regulations. Only the sizing of pet clothing is complicated. Buyers will require you to produce size-adjustable styles.

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[33] The PETA website offers a database with more than 1,000 PETA-Approved Vegan brands.

- **Work wear**

This is a niche with several sub-niches, including apparels that protect against rain and foul weather, against liquid chemicals, against fire and flames, against the thermal hazards of an electric arc and high-visibility apparel. Check the EU Regulation on PPE[34] and its many different related norms and standards.

- **Corporate wear**

Many large organizations like banks and hotels tender their corporate ware. These are usually three-year contracts in which a supplier needs to guarantee the quality and colour consistency of deliveries. There are no specific legal requirements but demand stock keeping, flexibility, printing, colour fastness and fabric quality etc.

- **High-performance wear**

High-performance wear is a niche market in which many technical innovations are implemented. Companies developing high-performance wear try to create individual USPs on their garments and collection that will help athletes with their performance. There are no specific legal requirements but demand breathability, durability (abrasion, adhesion, colour fastness) and water resistance etc.

- **Medical and adaptive apparel**

The cohort of elderly people in Europe is growing and so is this niche. People with certain disabilities or medical conditions often cannot wear regular clothing. Medic and adaptive apparels are constructed in a way that the target group can dress and undress without or with only minimum help. This apparel can also have technical, supportive, moisture control or anti-bacterial functions. Such apparels require special technical textiles, sizing and shape.

- **Swimwear**

UV-protective swimwear is growing in popularity in Europe as consumers become more aware of the risk of sunburn. UV-protective clothing is considered as Category -1 PPE under the scope of the EU Regulation on personal protective equipment.

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[34] PPE Regulations https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0425

- **Leather**

To avoid the risk of Chromium VI in leather apparel and accessories, buyers now-a-days require chrome-free leather tanning. This can be either vegetable tanned or wet-white tanned leather. Popular certifications for leather are **Leather Working Group *[see Appendix - 16]*** and **Naturleder[35]**. The Textile Exchange has also started developing a new international standard for fair and sustainable leather, but is has not published it yet. European Committee for Standardization[36] (CEN/TC 289) is the official technical body for the development of European Standards for leather & related products. So far, there are 143 standard requirements[37] related to leather products *[see Appendix – 17 for CEN Certifications on Leather]*. Alternatively, there are around 233 standards specified by International Standard Organization (ISO)[38] on leather.

- **Zero-emission apparel**

Sustainable apparel is outgrowing as a niche category. The term means many things: organic fabrics, fair wages, and responsible waste management etc. Recently, a large group of buyers under Sustainable Apparel Coalition (SAC) [39] have pledged to give special attention to cutting carbon emissions. Similarly, Kering Group and Gap pledged to use 100% renewable energy by 2030. H&M desires to become carbon positive by 2040. Therefore, investing in renewable energy can give exporters a competitive edge in the European market.

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[35] Naturleder - https://naturtextil.de/en/home/
[36] European Committee on Standardization - https://standards.cen.eu/dyn/www/f?p=204:7:0::::FSP_ORG_ID:6270&cs=1D94EDB2FE5C01AE4CCBB7FD5301B0043
[37] CEN published Standards - https://standards.cen.eu/dyn/www/f?p=204:32:0::::FSP_ORG_ID,FSP_LANG_ID:6270,25&cs=14CB4CC211C9EC9A81F6085F1B921D10C
[38] ISO Standards on Leather - https://www.iso.org/search.html?q=leather&hPP=10&idx=all_en&p=0&hFR%5Bcategory%5D%5B0%5D=standard&qt=&sort=rel&type=simple&published=on
[39] Sustainable Apparel Coalition (SAC) - https://apparelcoalition.org/

APPENDIX - 1 (REACH COMPLINCE & LAB TESTING GUIDELINES)[40]

REACH (Registration, Evaluation, Authorization, and restriction of Chemicals) regulates chemicals, heavy metals and pollutants in all consumer products imported to or manufactured in the European Union. REACH lab testing is a material analysis measuring the chemicals and heavy metals content of restricted SVHCs (Substances of Very High Concern). Third-party lab testing is the only way to verify that your product is REACH compliant, and therefore legal to sell in the European Union. Once the test is done, you'll receive a REACH lab test report which can be used as proof of compliance – assuming the product passes the lab test.

Products required for lab testing of REACH

As REACH is applicable to all consumer goods sold in the European Union, essentially all products and materials can be subject to REACH lab testing. Therefore, REACH lab testing is applicable to the following products:

- Textiles
- Plastic products
- Leather wallets, shoes, jackets
- Jewelry and accessories
- Watches
- Furniture

List of lab testing companies for REACH

Although presenting lab testing report for REACH is not the official requirement yet it is the only way to know for sure that products sold/ exported are REACH complaint. Some of the third-party companies offering REACH compliance testing are:

- **SGS (Switzerland & Pakistan)**[41]
- **TTi Testing Laboratories (Pakistan)**[42, 43]
- QIMA (Hong Kong)[44]
- Bureau Veritas (France)[45]
- Intertek (UK)[46]
- TUV (Germany)

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[40] https://www.compliancegate.com/reach-product-lab-testing/#What_products_can_be_REACH_lab_tested
[41] https://www.sgsgroup.pk/en/environment-health-and-safety/compliance-and-auditing/product-and-process-safety/reach-solutions
[42] http://www.ttilabs.net/yarn-testing/
[43] http://www.ttilabs.net/analytical-testing/
[44] https://www.qima.com/reach-testing
[45] https://group.bureauveritas.com/markets-services/consumer-products-retail/softlines-accessories
[46] https://www.intertek.com/textiles-apparel/

STEP BY STEP GUIDE FOR NEW EXPORTERS: EXPORT PROCEDURES

REACH lab testing cost and time required

REACH testing costs are multiplied based on the number of materials and colors tested. A single-colored material sample test costs less than a product made of multiple materials and color variations. The average lab test costs between $300 to $600, assuming exporter intends to test two to three different materials and color variations. However, this figure is provisional. The time required for lab testing depends on the materials and color variations of the product. In many cases, exporters may get the test report from the testing lab within around 2 to 4 weeks.

Illustration: Red T-Shirt

A single-colored material test is less expensive, as detailed in the table below.

Overview	# Tests	Cost (USD)
REACH-Nickel Release	1	70
REACH-Total Cadmium Content	1	20
REACH-Phthalate Content	1	40
REACH-Organotin Content	1	100
REACH-Pentachlorophenol Content	1	90
Total cost (US Dollars)		**320**

**APPENDIX - 2 (CE MARKING GUIDELINES – APPAREL & LEATHER)**

CE marking indicates the fitness of a product meeting meet EU safety, health and environmental protection requirements. It is required for products manufactured anywhere in the world that are then marketed in the EU. Some products are subject to several EU requirements at the same time. Exporters must make sure that the product complies with all the relevant requirements before affixing the CE marking to it.

Product required for CE Marking

CE marking is only obligatory for products for which EU specifications exist. It is forbidden to affix the CE marking to products for which EU specifications do not exist or do not require the affixing of CE marking. If your product(s) fall(s) within the sector of personal protective equipment[47], then Regulation (EU) 2016/425[48] concerning CE marking applies.

Six Steps to affix CE Marking

The CE Marking Process has six simple, but necessary steps to complete CE marking process. If you are a manufacturer of PPE, follow these 6 steps to affix a CE marking on your product:
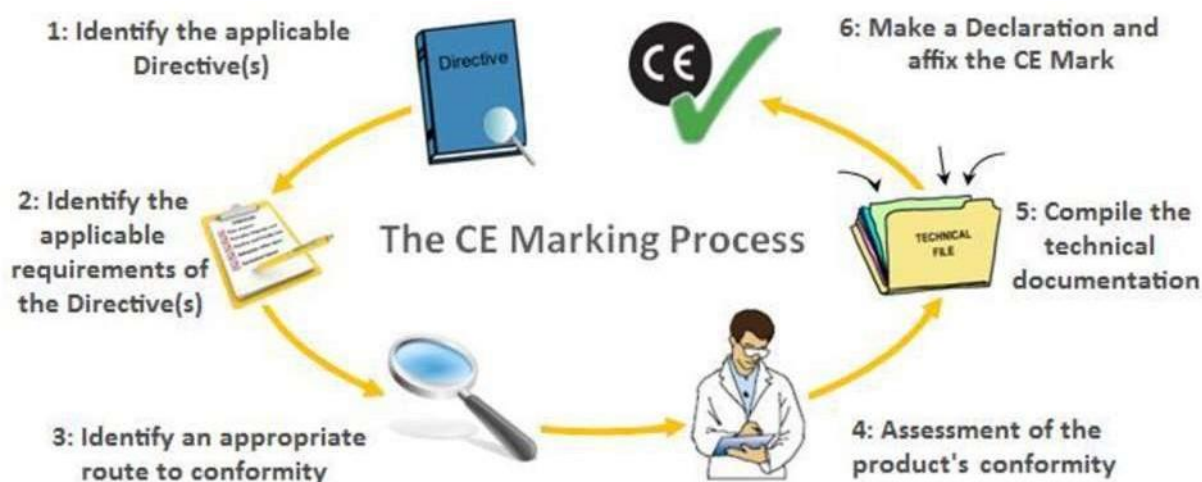
Step 1: The PPE Regulation (EU) 2016/425 specifies the essential health and safety requirements that the product needs to meet in order for the manufacturer to affix the CE marking.

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[47] https://ec.europa.eu/growth/sectors/mechanical-engineering/personal-protective-equipment_en
[48] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0425

> The Regulation defines personal protective equipment (PPE) as:
> (a) equipment designed and manufactured to be worn or held by a person for protection against one or more risks to that person's health or safety.
>
> (b) interchangeable components for equipment referred to in point (a) which are essential for its protective function
>
> (c) connection systems for equipment referred to in point (a) that are not held or worn by a person, that are designed to connect that equipment to an external device or to a reliable anchorage point, that are not designed to be permanently fixed and that do not require fastening works before use.

Step 2: The regulation has detailed PPE products into 3 risk categories (see Annex-1 of the regulation[49]) whereas essential health and safety requirements for PPE have been laid down in Annex-II of the regulation[50].

Step 3: When dealing with personal protective equipment, only PPE products falling under category II and III require the involvement of a Notified Body[51] for conformity assessment. However, the manufacturers can also assess their products if the regulation does not require the involvement of notification body.

Step 4: Test the product and check its conformity

If you manufacture a product it is your responsibility to test the product and check its conformity to the EU legislation (conformity assessment procedure).

Step 5: Draw up and keep available the required technical documentation (Annex - III of the regulation)

- For category I PPE: the manufacturer should follow internal protection control procedure (detailed in Annex IV of the regulation) and establish technical documentation for EU Declaration of conformity.
- For category II PPE: EU type examination to be carried out by the notified body.

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[49] PPE Regulation (EU) 2016/425 - https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0425
[50] ibid.
[51] Conformity Assessment Bodies - https://ec.europa.eu/growth/single-market/goods/international-aspects/mutual-recognition-agreements/

- Fore category III PPE: After EU type examination by the notified body, manufacturer have the choice to either conform to internal production control with supervised inspections of products at random or conform to quality assurance of the production process.

Step 6: Affix CE Marking

Once the necessary steps have been successfully completed, the CE marking must be affixed to the product as per EU marking criteria. If a Notified Body has been involved in the conformity assessment procedure, its identification number must also be displayed.

CE Marking Service Companies

- DAS Pakistan Pvt Limited
- SGS
- ISO Xpert Management & IT Consultants
- ProductIP.com
- CEmarking.net
- CE-check.eu
- Conformance
- CE Marking Association
- TÜV Rheinland
- Element
- Intertek
- Underwriters Laboratories
- Bureau Veritas

APPENDIX – 3 (BIOCIDES REGISTRATION GUIDELINES)

The key requirement of Biocidal Products Regulation (BPR) is that all biocidal products require an authorization by European Chemicals Agency (ECHA)[52] before they can be placed on the EU market, and the active substances contained in that biocidal product must be previously approved.

The Biocidal Products Regulation (BPR) also sets rules for the use of articles treated with or adding one or more biocidal products. Articles can only be treated with biocidal products approved in the EU. The European list of approved active substances which may be used in biocidal products are available at ECHA website[53]. This also applies to articles manufactured outside of EU. Some treated articles require additional labelling.

Scope of Biocidal Products

The definition of biocidal active substance, biocidal products and treated article is listed as follows:

- **Active substance:** a substance or a micro-organism that has an action on or against harmful organisms.
- **Biocidal products:** any substance or mixture, consisting of, containing or generating one or more active substances, with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action.
- **Treated article:** Articles that have been treated with, or intentionally incorporating, one or more biocidal products.

Classification of Biocidal Products

Biocidal products covered by the BPR regulation are classified into 22 biocidal product-types, grouped in 4 main groups.

Group	Product Types
Group 1 Disinfectant	- PT 1 Human hygiene - PT 2 Disinfectants and algaecides not intended for direct application to humans or animals - PT 3 Veterinary hygiene - PT 4 Food and feed area - PT 5 Drinking water

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[52] European Chemicals Agency (ECHA) - https://echa.europa.eu/information-on-chemicals/biocidal-products
[53] Approved Active Substance List - https://echa.europa.eu/information-on-chemicals/biocidal-active-substances

Group 2 Preservatives	• PT 6 Preservatives for products during storage • PT 7 Film preservatives • PT 8 Wood preservatives • PT 9 Fibre, leather, rubber and polymerized materials preservatives • PT 10 Construction material preservatives • PT 11 Preservatives for liquid-cooling and processing systems • PT 12 Slimicides • PT 13 Working or cutting fluid preservatives
Group 3 Pest control	• PT 14 Rodenticides • PT 15 Avicides • PT 16 Molluscicides, vermicides and products to control other invertebrates • PT 17 Piscicides • PT 18 Insecticides, acaricides and products to control other arthropods • PT 19 Repellents and attractants • PT 20 Control of other vertebrates
Group 4 Other Products	• PT 21 Antifouling products • PT 22 Embalming and taxidermist fluids

Article 95 List - Active Substance Supplier List

A biocidal product can not be marketed in EU if the active substance supplier or product supplier is not listed in the active substances suppliers list which is also called Article 95 list. In this regard, Non-EU companies using biocidal active substances, biocidal products and treated articles can appoint an EU-based representative to apply for the inclusion in Article 95 list[54].

Labeling of biocidal products & treated articles

The labeling of treated articles must be done according to both the Regulation on Classification, Labelling and Packaging (CLP)[55] and the additional requirements in the Biocidal Products Regulation.

Compliance obligation with EU BPR Regulation

Role	How to Comply
Suppliers of biocidal active substances	• Check if their products are covered by BPR regulation or not. • Check if their active substances have been approved or not in EU. • Apply for the inclusion in the article 95 list. • Apply for approval of new active substances if necessary.

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[54] Article 95 List - https://echa.europa.eu/information-on-chemicals/active-substance-suppliers
[55] EU CLP Regulation (EC) No 1272/2008
https://www.chemsafetypro.com/Topics/EU/CLP_Regulation_EC_No_1272_2008.html

Formulators or suppliers of biocidal products	- Check if the active substances have been approved or not. - Check if the suppliers of active substances are on article 95 list or not. - Apply for product authorization - Apply for inclusion in the article 95 list
Suppliers and manufacturers of articles	- Check if their articles need to be treated with biocidal products or not. - If yes, only use approved active substances to treat articles. - Check if any claim is made regarding the biocidal property or function of treated article; If yes, label the treated articles accordingly. - Provide info on the biocidal treatment of articles to downstream customers.

If a non-EU manufacturer or supplier of the active substance or biocidal product cannot get the support of EU-BPR compliance from their EU importers, they can appoint an 'Only Representative' to submit the registration or materials on behalf of them to fulfill the obligations under EU-BPR.

APPENDIX – 4 (BETTER COTTON INITIATIVE - BCI)

The Better Cotton Standard System is a holistic approach to sustainable cotton production which covers all three pillars of sustainability: environmental, social and economic. Each of the elements – from the Principles and Criteria to the monitoring mechanisms which show results and impact – work together to support the Better Cotton Standard System, and the credibility of Better Cotton and BCI. The system is designed to ensure the exchange of good practices, and to encourage the scaling up of collective action to establish Better Cotton as a sustainable mainstream commodity.

The components which make up the Better Cotton Standard System[56] are:

1. **'Principles and Criteria'[57]:** providing a global definition of Better Cotton through 7 key principles[58].

    a. BCI Farmers minimize the harmful impact of crop protection practices
    b. BCI Farmers promote water stewardship
    c. BCI Farmers care for the health of the soil
    d. BCI Farmers enhance biodiversity and use land responsibly
    e. BCI Farmers care for and preserve fibre quality
    f. BCI Farmers promote decent work
    g. BCI Farmers operate an effective management system

2. **'Capacity Building[59]':** supporting and training farmers in growing Better Cotton, through working with experienced implementing partners[60] at field level.

3. **'Assurance Programme[61]':** regular farm assessment and measurement of results through 8 consistent results indicators, encouraging farmers to continuously improve.

4. **'Chain of Custody'[62]:** connecting supply and demand in the Better Cotton supply chain.

5. **'Claims Framework'[63]:** spreading the word about Better Cotton by communicating powerful data, information and stories from the field.

6. **'Results and Impact'[64]:** monitoring and evaluation mechanisms to measure progress/change, to ensure that Better Cotton delivers the intended impact.

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[56] Better Cotton Standard System - https://bettercotton.org/better-cotton-standard-system/
[57] Principles and Criteria - https://bettercotton.org/better-cotton-standard-system/production-principles-and-criteria/
[58] BCI Criteria & Implementation Guide - https://bettercotton.org/wp-content/uploads/2019/06/Better-Cotton-Principles-Criteria-V2.1.pdf
[59] Capacity Building - https://bettercotton.org/better-cotton-standard-system/capacity-building/
[60] List of Implementing Partner Globally - https://bettercotton.org/wp-content/uploads/2018/10/BCIs-Global-Partner-List_23.10.18-update.pdf
[61] Assurance Programme - https://bettercotton.org/better-cotton-standard-system/assurance-program/
[62] Chain of Custody - https://bettercotton.org/better-cotton-standard-system/chain-of-custody/
[63] Claims Framework - https://bettercotton.org/better-cotton-standard-system/better-cotton-claims-framework/
[64] Results & Impacts - https://bettercotton.org/better-cotton-standard-system/results-and-impact/

BCI's Implementing Partners in Pakistan

- Sangtani Women Rural Development Organization
- Cotton Connect Pakistan
- WWF-Pakistan
- CABI
- Lok Sanjh Foundation
- REEDS
- Mariam Rural Welfare Organization
- Yazman

Pakistan has in total 144 BCI members (127 Suppliers & Manufacturers and 7 Civil Society members) encompassing organizations all the way from farms to fashion and textile brands.

APPENDIX – 5 (GLOBAL RECYCLED STANDARD - GRS)

The Global Recycled Standard (GRS) is a voluntary product standard for tracking and verifying the content of recycled materials in a final product.

The standard applies to the full supply chain and addresses

- traceability,
- environmental principles,
- social requirements,
- chemical content and
- labeling.

The GRS covers processing, manufacturing, packaging, labeling, trading and distribution of all products made with a minimum of **20% recycled material**. It also sets requirements for third-party certification of recycled content, chain of custody, social and environmental practices, and chemical restrictions. The standard supports companies looking to verify the recycled content of their products as well as responsible social, environmental and chemical practices in the production of these products.

GRS Certifications[65]

NSF International, being the certification body, inspects at random for GRS Compliance certifications at four different stages:

- **Material collection (Reclaimed Material Declaration Form):** Issued annually through random inspections/ self-declaration. It applies to all claimed material identified as pre-Consumer or post-Consumer.
- **Material concentration:** Issued annually through random inspections/ self-declaration. It applies to all claimed material identified as pre-Consumer or post-Consumer.
- **Material Recycling:** Reclaimed Material Declaration Form required to get GRS transaction certificate (TC).
- **Production & Trading:** Transaction Certificate (TC) stating pre- and post-consumer recycled material for each batch is required to get GRS production & trading certificate.

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[65] Global Recycled Standard 4.0 - https://textileexchange.org/wp-content/uploads/2017/06/Global-Recycled-Standard-v4.0.pdf

The GRS also requires certified organizations to be in compliance with the Content Claim Standard (CCS)[66], a chain of custody guideline. This chain of custody requirement makes the paperwork transfer an important aspect of the standard to verify the actual recycled content of a final product. The GRS also includes social, environmental and chemical criteria to verify responsible practices in the production of certified product.

The social criteria of the standard require organizational policies that:

PROHIBIT	Forced, bonded, indentured, prison or child labor
	Discrimination, harassment and abuse of workers
PROTECT	Freedom of association and provides recognition of the right to collective bargaining
	Health and safety of workers
PROVIDE	Wages, benefits and terms of employment that meet or exceed legal minimums
	Working hours that comply with national laws, benchmark industry standards or relevant international standards

For environmental criteria, organizations:

MUST HAVE	> An environmental management system (EMS) that meets criteria outlined in the standard	
MUST HAVE	> A chemical management system (CMS) that meets criteria defined in the standard	
MUST MONITOR	> Energy and water use > Wastewater/effluent	> Emissions to Air > Waste Management

The standard addresses only the use and management of chemicals in the processing of GRS products.

RESTRICT	Substances classified as dangerous to human health and/or to the environment by REACH under Substances of Very High Concern (SVAC)
RESTRICT	Substances (and mixtures classified with particular hazard codes or risk phases identified in Table A of the standard) w/ established health or environmental concerns
RESTRICT	Substances that do not comply with the Manufacturer's Restricted Substance List (MRSL) from ZDHC (roadmaptozero.com)

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[66] Content Claim Standard - https://textileexchange.org/content-claim-standard/

APPENDIX – 6 (RESPONSIBLE DOWN STANDARD - RDS)

The Responsible Down Standard[67, 68] is an independent, voluntary global standard, which means that companies can choose to certify their products to the RDS, even if there is no legislation requiring them to do so. The RDS was developed and revised over three years, with the input of animal welfare groups, industry experts, brands and retailers. The standard recognizes and rewards the best practices[69] in animal welfare.

How does the RDS work?

1. The brand[70] talks to their suppliers to get a clear picture of their down supply chain. Eventually each step of the supply chain, all the way to the farm, will get certified by an approved third-party (called a Certification Body).

2. The certification process involves two steps.

    - On-site audit: an inspector visits a factory or company, does a visual inspection, checks documents and procedures, and interviews staff and workers. The results from this visit is called an audit report.

    - Certification decision: the audit report is sent to a certifier who will review all the results, and decide whether the company is issued certification or not.

3. On farms and slaughterhouses (anywhere animals are present) the Certification Body checks the well-being of the animals, looks for any evidence of live plucking or force-feeding, and makes sure everything is done in accordance with the s

> Every certification conducted by a Certification Body involves two people: an inspector and a certifier. This is called the **'four eyes principle'**

4. At factories and manufacturers, the Certification Body[71] checks the RDS materials (down, feathers, jackets, duvets, etc.) that enter and leave a factory to make sure they are properly identified. RDS products are tracked as they move through production, and are kept separate from non-certified products. The cost associated with certification fee are available here[72].

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[67] RDS v3.0 - https://responsibledown.org/wp-content/uploads/2015/06/RDS-101-V3.0-2019.07.01.pdf
[68] RDS v2.0 - http://responsibledown.org/wp-content/uploads/2015/07/TE-Responsible-Down-Standard-2.0-opt.pdf
[69] List of RDS certified companies - https://textileexchange.org/standards/find-a-certified-company/
[70] List of RDS Certified Brands - https://responsibledown.org/find-responsible-down-standard_categories/apparel/
[71] List of Accredited Bodies - https://textileexchange.org/standards/accreditation/
[72] RDS Certification Fee - https://textileexchange.org/wp-content/uploads/2020/08/ASR-107-V2021.1-Certification-Fee-Structure.pdf

APPENDIX – 7 (RESPONSIBLE WOOL STANDARD - RWS)

The Responsible Wool Standard[73] is a voluntary standard[74] that addresses the welfare of sheep and the land they graze on.

How does the RWS work?

The RWS requires all sites[75] to be certified, beginning with the wool farmers and through to the seller in the final business to business transaction. Usually the last stage to be certified is the garment manufacturer or brand. Retailers (business-to-consumers) are not required to be certified. Farms are certified to the Animal Welfare and Land Management and Social Modules of the RWS. Subsequent stages of the supply chain are certified to the Content Claim Standard[76] requirements.

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[73] RWS v2.1 - https://textileexchange.org/documents/responsible-wool-standard/
[74] Authorized Accreditation Bodies - https://textileexchange.org/standards/accreditation/
[75] List of Certified Companies - https://textileexchange.org/integrity/find-certified-companies/
[76] Content Claim Standard - https://textileexchange.org/documents/content-claim-standard-ccs/

APPENDIX – 8 (STANDARD 100 & LEATHER STANDARD BY OEKOTEX)

STANDARD 100[77] & Leather Standard[78] by OEKO-TEX® are one of the world's best-known labels for textiles & leathers tested for harmful substances. It stands for customer confidence and high product safety.

If a textile article carries the STANDARD 100 label, it guarantees that every component of that article, i.e. every thread, button and other accessories, has been tested for harmful substances and it is harmless for human health.

Standard 100 and Leather Standard by OEKO-TEX Tests

The tests are conducted by independent OEKO-TEX® partner institutes on the basis of an extensive OEKO-TEX® criteria catalogue. In Standard 100 test, numerous regulated and non-regulated substances, which may be harmful to human health are tested. In many cases, the limit values for the STANDARD 100 go beyond national and international requirements. The criteria catalogue is updated at least once a year and expanded with new scientific knowledge or statutory requirements.

The GMO test in STANDARD 100 by OEKO-TEX® is mandatory if you want "organic cotton" to be stated in the certificate text on the STANDARD 100 certificate. Organic Cotton must be certified separately from other cotton. The GMO test is optional for all other certifications in accordance with STANDARD 100 by OEKO-TEX®. The test is performed in two steps:

1. The sample is shredded and the cotton fibers are mechanically and enzymatically degraded. The genetic material (DNA) is isolated from the fiber and purified in a multi-stage process.

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[77] OEKO-TEX 100 - https://www.oeko-tex.com/fileadmin/user_upload/Marketing_Materialien/STANDARD_100/FAQs/FAQ_STANDARD_100_EN_ES_01.2019.pdf
[78] Leather Standard by OEKO-TEX - https://www.hohenstein.com/fileadmin/user_upload/Downloads/Brochures/OEKO-TEX/OEKO-TEX_FAQ_LEATHER_STANDARD_EN.pdf

2. If the DNA contains specific marker genes, it is classified as a genetic modification. These genes can be identified on a molecular-biological level. Control reactions are used to prove that the cotton DNA is unmodified and exclude false-negative results.

Testing Criteria

STANDARD 100 by OEKO-TEX® distinguishes between four product classes: Infants and young children, skin contact, without skin contact, and accessory materials that can be tested based on the criteria in Annex 4 or Annex 6 of STANDARD 100 by OEKO-TEX®.

The strict tests for harmful substances and the comprehensive catalog of measures of STANDARD 100 by OEKO-TEX® include:

- ➢ Important legal regulations such as banned azo colorants, pentachlorophenol, cadmium, lead (US-CPSIA), etc.
- ➢ Numerous harmful chemicals, even if they are not yet regulated legally.
- ➢ Numerous substance classes that are relevant to the environment.
- ➢ Requirements of Annexes XVII and XIV of the REACH Regulation and the ECHA-SVHC candidate list.

Prerequisites for issuing the certificate and the STANDARD 100 label are:

- ➢ The material or different constituents of a textile product must comply with the conditions, test criteria, and limit values of the standard.
- ➢ Operational quality assurance.
- ➢ Successful quality audit in your company by the OEKO-TEX® Institute before or shortly after the certification.

5 Steps to certification

- Complete the application form.
- The selected OEKO-TEX® institute will get in touch.
- After examining the documents, OEKO-TEX defines the scope of the audit and success parameters. Lastly, articles are tested for compliance of the limit values according to STANDARD 100 GMO.
- If the product has successfully passed the laboratory test, the applicant receives the STANDARD 100 GMO certificate together with a detailed test report from the OEKO-TEX® institute.
- An OEKO-TEX® expert may visit your site in order to confirm all the details.

Validity: If you have successfully undergone the certification process for STANDARD 100 GMO, you can label your products accordingly for 12 months.

Costs: License fees are charged for the certification. Depending on the amount of testing involved, this includes the laboratory costs and costs for visits to your company. Our institutes will be happy to make you a non-binding offer.

Extension: You can request an extension of your STANDARD 100 GMO certificate at any time from your responsible institute.

Continuity: As holder of a STANDARD 100 GMO certificate, you agree to undergo regular audits by our independent testing institutes. The mandatory company visits take place in a 3-year cycle.

LEATHER STANDARD[79] by OEKO-TEX® is a globally standardized, independent testing and certification system for leather products and takes account of all processing stages, leather fiber materials, all kinds of leather accessories, and leather shoes. LEATHER STANDARD[80] by OEKO-TEX® distinguishes between four product classes: Infants and young children, skin contact, without skin contact, and accessory materials.
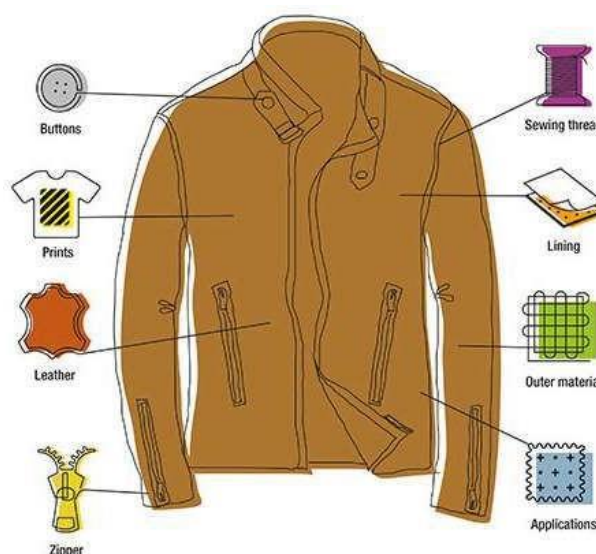
The strict tests for harmful substances and the comprehensive catalog of measures include:

- Important legal regulations such as banned azo colorants, chromium (VI), PFOS, lead (US-CPSIA), etc.
- Numerous harmful chemicals, even if they are not yet regulated legally
- Numerous substance classes that are relevant to the environment

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[79] Leather Standard - https://www.oeko-tex.com/importedmedia/downloadfiles/LEATHER_STANDARD_by_OEKO-TEX_R_-_Standard_en.pdf
[80] Leather Standard Brochure - https://www.hohenstein.com/fileadmin/user_upload/Downloads/Brochures/OEKO-TEX/OEKO-TEX_FAQ_LEATHER_STANDARD_EN.pdf

- Requirements of Annexes XVII and XIV of the REACH Regulation and the ECHA-SVHC candidate list.

Leather Standard Certification

- Fill out the application form and send it – together with the sample materials (if applicable) – to the OEKO-TEX® Institute of your choice.
- The selected OEKO-TEX® Institute will contact you.
- Your OEKO-TEX® Institute will check the submitted documents and sample materials, define the extent of the testing and necessary test parameters, and then examine your products.
- After successful laboratory tests and provision of all necessary documents, you will receive the LEATHER STANDARD certificate and a detailed test report from your OEKO-TEX® Institute.
- An OEKO-TEX® expert will visit you on site before or shortly after the certification to verify the given information.

* The LEATHER STANDARD certificate is valid for 1 year.

APPENDIX – 9 (EU ECOLABEL)

The EU Ecolabel covers a wide range of product groups, from major areas of manufacturing i.e. textile[81] to tourist accommodation. Key experts, in consultation with main stakeholders, develop the criteria for textiles in order to decrease the main environmental impacts over the entire life cycle of the product[82]. Because the life cycle of every product and service is different, the criteria are tailored to address the unique characteristics of each product type.

How to apply for EU Ecolabel

Producers, manufacturers, importers, service providers, wholesalers and retailers that produce products or provide services that fit within any of the established product and service group criteria are eligible to apply. Retailers can apply for products placed on the market under their own brand name.

Step 1: Contact the Competent Body[83] (responsible for assessing, awarding, and managing EU Ecolabel applications and licenses on the national level) in the European Economic Area where you are marketing your product. The Competent Body will then provide guidance on the documents needed for your dossier, such as declarations, data sheets, and test results. Recommendations on product testing laboratories that are ISO 17025[84] accredited or equivalent, along with any relevant technical expertise[85] needed to complete your application.

Step 2: Product and service registration on the online EU Ecolabel Catalogue, ECAT[86]

Step 3: An application dossier is required from all applicants in order to assess criteria compliance. The list of relevant declarations, data sheets and test results are laid out in each product or service group 'User Manual' which can be found under the respective tabs in the full list of established product groups. Your Competent Body will verify that all submitted information is accurate and substantiated and will carry out any further tests if necessary.

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[81] Textile Criteria for EU Ecolabel (Commission Decision 2014/350/EU)
https://ec.europa.eu/environment/ecolabel/documents/201703_textiles_commission_decision_with_amendments.pdf
[82] Textile EU Ecolabel Factsheet - https://ec.europa.eu/environment/ecolabel/documents/textile_factsheet.pdf
[83] List of competent bodies in EEA - https://ec.europa.eu/environment/ecolabel/competent-bodies.html
[84] ISO 17025 - https://www.iso.org/ISO-IEC-17025-testing-and-calibration-laboratories.html
[85] European Ecolabel and Green Public Procurement (GPP) Criteria for Textile Products -
https://ec.europa.eu/environment/ecolabel/documents/140124%20Ecolabel%20Textiles_Technical%20report%20final.pdf
[86] EU Ecolabel Catalogue (ECAT) - http://ec.europa.eu/ecat/

Step 4: Application submission and fees

The costs of running the scheme vary between Competent Bodies and from one product to another, fees may vary accordingly. Exact fee can be checked from the Competent Body EU Ecolabel Fee page or contact your Competent Body for a more precise cost estimate. Reduced fees are available for SMEs, micro-enterprises and companies from developing countries**. The table below presents the requirements on maximum fees established in the EU Ecolabel Regulation.

Type of applicants*	One-off application fee (€)**	Annual fee (€)***
Micro-enterprises	200-350	Maximum 18 750
SMEs and firms from developing countries	200-600	Maximum 18 750
All other companies	200-2 000	Maximum 25 000

Refer to the Commission Recommendation of 6 May, 2003 concerning the definition of micro, small and medium-sized enterprises.

*** 30% reduction for companies registered under EMAS or 15% reduction for companies certified under ISO 14001 can be applied. Reductions are not cumulative and only the higher reduction applies where both systems are met.*

**** Annual fees can be a flat fee or a fee based on the annual value of sales within the EU for the product awarded the EU Ecolabel. Where the annual fee is calculated as a percentage of the annual sales value, it will not be more than 0,15 % of that value. In the case of SMEs, micro-enterprises or applicants from developing countries, the annual fee is reduced by at least 25 %.*

Step 5: Assessment

After receiving your application, your Competent Body examines all submitted documentation, including any material sent directly by your suppliers and gives initial feedback within a two-month period. At that time, additional documentation may be requested. Competent Bodies can reject an application if sufficient documentation is not received within 6 months of any request for further information.

After all documentation has been approved, your Competent Body may carry out an on-site visit to your or your suppliers' sites. The Competent Body judges the necessity of this on-site visit on a case-by-case basis and may charge a fee for it. Contact your Competent Body for more information.

Step 6: Application approval & license award

Competent body issues license once the application is approved. This contract sets out the services or range of products covered within the licence, including any trade names or manufacturer's internal reference numbers. It will also lay out the terms of use of the EU Ecolabel.

Compliance Monitoring:

As a license holder, it is your responsibility to ensure criteria compliance throughout the entire validity of your license(s). Competent Body will explain how often test samples of your product should be conducted in order to proactively verify criteria compliance. Based on the discretion of your Competent Body, they may carry out factory inspections and product tests or visit your service. These inspections are intended to ensure that the environmental excellence is maintained for consumers. You or your supplier will need to keep a journal of all tests conducted along with their results. This documentation should be available at all times and may be requested by your Competent Body. If the Competent Body receives evidence that your product or service no longer complies with the criteria during the validity period, the Competent Body will request an immediate Corrective Action Plan or will prohibit the use of the EU Ecolabel on that product.

APPENDIX – 10 (GLOBAL ORGANIC TEXTILE STANDARD - GOTS)

The Global Organic Textile Standard (GOTS)[87] is the worldwide leading textile processing standard for organic fibres, including ecological and social criteria, backed up by independent certification of the entire textile supply chain.

The aim of the standard is to define world-wide recognized requirements that ensure organic status of textiles, from harvesting of the raw materials, through **environmentally and**

socially responsible manufacturing up to labelling in order to provide a credible assurance to the end consumer. Textile processors and manufacturers are enabled to export their organic fabrics and garments with one certification accepted in all major markets.

Criteria:

The standard covers the processing, manufacturing, packaging, labelling, trading and distribution of all textiles made from at least 70% certified organic natural fibres. The final products may include, but are not limited to fibre products, yarns, fabrics, clothes and home textiles. The standard does not set criteria for leather products.

The key criteria for fibre production can be identified as:

- Organic certification of fibres on basis of recognized international or national standards (IFOAM family of standards, EEC 834/2007, USDA NOP)
- Certification of fibres from conversion period is possible if the applicable farming standard permits such certification
- A textile product carrying the GOTS label grade 'organic' must contain a minimum of 95% certified organic fibres whereas a product with the label grade 'made with organic' must contain a minimum of 70% certified organic fibres

Criteria for manufacturing & production is available at https://www.global-standard.org/the-standard/general-description.html.

Quality Assurance

Generally, a company participating in the GOTS certification scheme must work in compliance with all criteria of the standard. GOTS relies on a dual system to check compliance with the relevant criteria consisting of on-site auditing and residue testing.

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[87] GOTS v6.0 - https://www.global-standard.org/images/GOTS_Documents/GOTS_Version_6.0_EN.pdf

Certification[88]

On-site inspection and certification of processors, manufacturers and traders performed by independent specially accredited bodies[89] is the basis of the GOTS monitoring system in order to provide a credible assurance for the integrity of GOTS certified textiles.

Certification of the entire textile supply chain:

- Fibre producers (farmers) must be certified according to a recognized international or national organic farming standard that is accepted in the country where the final product will be sold.

- Certifiers of fibre producers must be internationally recognized through ISO 65/17065, NOP and/or IFOAM accreditation. They also must be accredited to certify according to the applicable fibre standard.

- Operators from post-harvest handling up to garment making and traders have to undergo an onsite annual inspection cycle and must hold a valid GOTS scope certificate applicable for the production / trade of the textiles to be certified.

- Certifiers of processors, manufacturers and traders must be internationally accredited according to ISO 65/17065 and must hold a 'GOTS accreditation' in accordance with the rules as defined in the 'Approval Procedure and Requirements for Certification Bodies'.

Licensing & Labelling[90]

With completion of GOTS certification, the certified entity acquires a license which entitles it to participate in the GOTS program, including use of the standard and the GOTS logo[91] on its respective GOTS Goods. At present, there are more than 200 companies/ manufacturers in Pakistan having GOTS certification.

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[88] https://www.global-standard.org/certification/how-to-become-certified.html
[89] Approved Certification Bodies - https://www.global-standard.org/certification/approved-certification-bodies.html
[90] Licensing & Labelling Guide - https://www.global-standard.org/images/GOTS_Documents/Licensing_and_Labelling_Guide_08May2017.pdf
[91] How to get Products Labelled - https://www.global-standard.org/licensing-and-labelling/how-to-get-products-labelled.html

APPENDIX – 11 (BLUESIGN)

The Blue Way by BLUESIGN represents the vision and mindset of responsible and sustainable manufacturing of textile consumer products. BLUESIGN is a system that provides safer and more sustainable environment for people to work in and everyone to live in. Powered by a holistic approach, BLUESIGN traces each textile's path along the manufacturing process, making improvements at every stage from factory floor to finished product. BLUESIGN changes the environmental impact of textiles for good. As a solution provider and knowledge broker, BLUESIGN acts as an independent verifier to secure trust and transparency. Corresponding to this approach, BLUESIGN encourages the industry to increase their efforts in sustainable processes step by step.

Criteria

The bluesign criteria defines the essential requirements:

- Requirements for inputs[92], production sites[93] and products[94].
- Selection of priority substances[95] and substance limits (expressed in Blue Sign Black Limits[96] and Blue Sign Substances List[97]).
- Bluesign is committed to revise and improve the bluesign system so that it reflects and meets the requirements of the strictest and most advanced regulations worldwide concerning sustainable textile production, to maintain a high level of product safety, to encourage usage of the latest technology, and to fulfill stakeholder expectations.
- The Bluesign criteria are subject to changes in the political, regulatory, scientific, technical and sustainability spheres. For this reason, revision and amendment are necessary at regular intervals (at least every four years) or promptly if there is an urgent need.
- Selection and/or amendment of priority substances, updating of related limits, and publishing of related documents (BSBL, BSSL) take place regularly at least every year.

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[92] Criteria for Converters - https://www.bluesign.com/downloads/criteria- 2020/bluesign_criteria_for_converters_v3.0_2020-03.pdf
[93] Criteria for Production sites - https://www.bluesign.com/downloads/criteria-2020/bluesign_criteria_for_production-sites_v3.0_2020-03.pdf
[94] Criteria for Products - https://www.bluesign.com/downloads/criteria-2020/bluesign_criteria_for_bluesign_product_v3.0_2020-03.pdf
[95] Restricted Substances List (RSL) - https://www.bluesign.com/downloads/rsl/bluesign-rsl-v10.0_for-website.pdf
[96] Bluesign® System Black Limits (BSBL) v1.0 - https://www.bluesign.com/downloads/bsbl/bsbl-v1.0.pdf
[97] Bluesign® System Substances List (BSSL) v10.0 - https://www.bluesign.com/downloads/bssl/bssl-v10.0.pdf

Blue Sign System Compliance

For all kinds of textile and trim manufacturers, assemblers and converters of materials or ready-made products, BLUESIGN offers an extensive range of Blue Step services.

- Chemical inventory list evaluation and verification.
- On-site company assessment including evaluation of all risks and emissions, benchmarking resources, cost savings and environmental performance, chemical management system as well as recommendations and guidance on continuous improvements.
- Guidance and consulting on implementing the best practices in the area of chemical management.
- Access to the world's largest chemical positive list for a proactive chemical change management.

The system partnership including a comprehensive service package is provided along with communication support with trademark use for qualification of factory site and materials produced, access to extensive applications within a cloud computing solution to get access to the supply chain and publication of your approved products using a unique verification tool.

Bluesign also offers third party evaluation for ongoing progress. A bluesign assessment is an independent, systematic examination of data, processes and performance with regard to resources and the influence these have on people and the environment. It increases the effectiveness of your risk management and presents confirmation from independent technical experts.

APPENDIX – 12 (BUSINESS SOCIAL COMPLIANCE INITIATIVE - BSCI)

BSCI, a program of the Foreign Trade Association of Europe, is designed to improve working conditions for the suppliers of BSCI's participating member companies. BSCI is based on a code of conduct[98] having 11 principles that support its members:

- The rights of Freedom of Association and Collective Bargaining
- No Discrimination
- Fair Remuneration
- Decent Working Hours
- Occupational Health and Safety
- No Child Labour
- Special Protection for Young Workers
- No Precarious Employment
- No Bonded Labour
- Protection of the Environment
- Ethical Business Behaviour

These principles enable companies to monitor, engage, get empowered and receive support to put sustainable trade at the heart of their business.

BSCI membership

BSCI's participants are retailers, importers and brand companies sourcing goods for European markets from international supply chains. In order to join BSCI, you must first become a member of Foreign Trade Association (FTA), the association which runs BSCI.

All companies with commercial and related trade activities worldwide as well as trade associations can request FTA membership online. These companies must not have manufacturing in risk countries as their main activity. Any other organisation or natural persons who do not meet the criteria of ordinary members but support the goals of FTA can request associate membership.

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[98] BSCI Code of Conduct - https://www.amfori.org/sites/default/files/amfori-2020-03-05-amfori-BSCI-code-of-conduct.pdf

BSCI Services

- By taking part in **amfori Advocacy**, members get:

A team of experts	A partner that stays on top of global political, legal and social developments
Influence on key policy issues	Valuable connections with key governmental and non-governmental stakeholders
Tools and resources	Tools to help you champion equity and diversity in business, including gender equality
Tailor-made advice	Tailor-made advice from our team of environmental, trade and social experts on issues such as: migrant workers, women's empowerment, chemical and timber legislation, trade agreements, customs legislation and anti-dumping regulations

- **Amfori BSCI[99]** members have access to world class tools such BSCI Platform which provides a single point for all supply chain performance information. By sharing monitoring activities' results, our members reduce effort, save money and increase consistency for buyers and suppliers. BSCI platform offers a range of practical auditing tools to help our members manage their risk and effectively monitor their supply chain.

- **BSCI Auditing Integrity Programme[100]** aims to maintain transparency and reliability in monitoring process. Assisting members with the challenges of the future, the programme provides a comprehensive, robust and independent acceptance process for audit companies to engage with amfori BSCI activities and ensure excellence in audit quality at the audit company and auditor level. A amfori BSCI audit helps a business monitor its supply chain to ensure that all suppliers are treating workers ethically and legally.

- The **amfori BEPI platform[101]** provides a single point for environmental performance data whereas **BSCI sustainability intelligence dashboard[102]** allows members to clearly visualise complex supply chains.

- The **amfori Academy[103]** offers a wide range of training, workshops and e-learning opportunities for members and their business partners to drive improvements across the world.

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[99] Amfori BSCI - https://www.amfori.org/content/amfori-bsci
[100] BSCI Auditing Integrity Programme - https://www.amfori.org/content/audit-integrity-programme-0
[101] Amfori BEPI platform - https://www.amfori.org/content/amfori-bepi-platform
[102] BSCI Sustainability intelligence dashboard - https://www.amfori.org/sustainability-intelligence
[103] Amfori Academy - https://www.amfori.org/content/login-learn-and-thrive-join-amfori-academy

APPENDIX – 13 (WORLDWIDE RESPONSIBLE ACCREDITED PRODUCTION - WRAP)

WRAP is an independent, objective, non-profit team of global social compliance experts dedicated to promoting safe, lawful, humane, and ethical manufacturing around the world through certification and education. The primary activity of WRAP is the certification program, which is the largest of its kind in the world mainly focused on apparel, footwear, and sewn products. WRAP also operate a comprehensive social compliance training program.

WRAP Certification

WRAP certificate involves a 5-step process. The process usually takes as little as six weeks to get certified but can take anywhere from 2-6 months, or in rare cases even longer.

- The process begins with the production facility filing an initial **application** with WRAP and paying the registration fee.
- The facility will conduct a **Pre-Audit Self- Assessment** of its compliance with WRAP's 12 Principles[104], which is followed by an audit conducted by one of the WRAP accredited **monitoring** firms.
- The report from that audit is sent to WRAP, where WRAP and an independent review board **evaluates** and then decide to **issue a certificate**.

WRAP Certification Levels

- **Platinum (valid for 2 years)** certifications are awarded to facilities that have demonstrated full compliance with WRAP's 12 Principles for 3 consecutive certification audits. Platinum facilities must successfully pass every audit with no corrective actions or observations and maintain continuous certification with no gaps between certification periods.
- **Gold (valid for 1 year)** certification is the standard WRAP certification level, awarded to facilities that demonstrate full compliance with WRAP's 12 Principles.
- **Silver (valid for 6 months)** WRAP may issue or a facility may request, a Silver certificate if an audit finds it to be in substantial compliance with WRAP's 12 Principles,

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[104] 12 Principles of Audit Assessment - https://wrapcompliance.org/12-principles/

but identifies minor non-compliances in policies, procedures, or training that must be addressed.

WRAP charges a registration fee of **U.S. $1,195** for new facilities seeking certification as well as for Platinum and Gold-certified facilities seeking renewals (Silver-certified facilities seeking timely renewal are charged a reduced registration fee of U.S. $895).

*This fee does not include the price of the audit, which is set by the individual monitoring firms and paid directly to them by the facility seeking certification.

Accredited Monitoring firms in Pakistan

- Accordia Global Compliance Group-Pakistan
- Bureau Veritas Pakistan
- Intertek Pakistan (Pvt.) Ltd.
- SGS Pakistan

APPENDIX – 14 (SUPPLIER ETHICAL DATA EXCHANGE - SEDEX)

SEDEX provides an online platform, tools and services to help businesses operate responsibly and sustainably, protect workers and source ethically. Using Sedex enables businesses to work together to better manage their social and environmental performance and improve working conditions throughout the supply chain. Sedex audits are usually conducted on the basis of SMETA guidelines.

SMETA stands for Sedex Members Ethical Trade Audit and is one of the most widely used ethical audit formats in the world. It combines the best practices in the field of corporate social responsibility. The concept describes a methodology based on the Ethical Trading Initiative (ETI) Base Code. Audits in the SMETA format focus as much on labor conditions and occupational safety as on environmental standards and ethical business practices.

SEDEX Certification

- Join Sedex[105]
- Set up your Sedex Advance account
- Create your profile on the Member Directory and add certifications
- Complete questions in the Self-Assessment Questionnaire (SAQ)
- Upload any SMETA audits to the Sedex platform
- Share your audits with customers via the Sedex platform.

SEDEX Audit

- **Submit a self-evaluation form:** All applicants are required to complete a self-evaluation form before SEDEX begins with audit. Forms are filled out by the sites to be audited.

- **Conduct a Sedex audit on site[106]:** Sedex auditors visit the sites to be audited (List of Affiliate Audit Companies[107]). An auditing team assesses the extent to which your social management documentation meets the SMETA criteria[108]. The duration of any given audit depends on the number of employees and locations.

- **Issue a report and CAPR:** Once the Sedex audit is done, the auditors create a corrective action plan for you along with a detailed audit report (SMETA Report &

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[105] SEDEX Membership Brochure - https://www.sedex.com/wp-content/uploads/2020/07/Supplier-brochure-.pdf
[106] SMETA Audit - https://www.sedex.com/our-services/smeta-audit/
[107] List of Auditors - https://www.sedex.com/affiliate-audit-companies/
[108] SMETA v6.1 - https://www.sedex.com/wp-content/uploads/2019/05/You-can-access-the-full-summary-guide-about-the-changes-here.pdf

CAPR), which you can now upload to the Sedex database. Once completed, you may opt to review your Sedex audit.

SEDEX Membership Types

1. **Supplier Membership**

Sedex Advance	• Share and exchange ethical audit data • Share one audit with multiple customers • Reduce the number of audits for your site and save money.
Sedex Member Directory profile	• Allows you to be visible to hundreds of potential new customers and showcase your business
Sedex e-Learning	• Hundreds of sustainability resources to improve your responsible business practices • SMETA guidance to help correct and action audit non-compliances • 17 Sustainability modules in English, Spanish and Chinese
Self-Assessment Questionnaire (SAQ)	• Gives you the ability to self-assess your own performance and meet customer compliance requirements • Helps you prepare for an audit Member services support
Member Services Support	• Dedicated 24-hour member services team • Multilingual support in 12 languages • Helpful information and resources

2. **Supplier Plus Membership**

At £150 a site per year Supplier Plus gives you a cost effective and quick way to understand your risk profile, areas for enhancement and promotional opportunities.

Access to Member Directory profile views	• See customers that are viewing your profile and create new business opportunities
Supplier Health Check Report	• Provides you a personalized assessment of your site's ethical performance and what your customers see • Can be used to show customers your level of engagement in being a responsible business • Can be uploaded onto the Member Directory to show customers or used in business documents
Site benchmarking	• Provides you an overview of how your site is performing compared with other sites in your industry or country • Shows an inherent risk score

SEDEX Membership cost

The annual membership fee for Supplier (B) members is £100 per site per year (VAT is chargeable to UK companies only), or 1200RMB in China if you pay the Sedex China office by BACS.

APPENDIX – 15 (ETHICAL TRADE INITIATIVE - ETI)

The Ethical Trading Initiative is a UK-based independent body which monitors member NGOs and companies' supply chains in accordance with an ethical base code. The organization was founded on 9 June 1998, with the intention of changing the lives of workers in companies' supply chains. An ETI audit will inspect your processes, suppliers and facilities against the nine principles of the ETI Code, as well as ensuring you are compliant with relevant national and international legislation. Being able to demonstrate that your brand follows ETI standards provides consumers with the confidence that you trade in a fair and ethical manner.

ETI Base Code

The ETI Base Code[109] is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognized code of labour practice.

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

ETI does not certify any products. Its approach is to mainstream respect for workers' rights into the day-to-day behaviour of buying companies, in a way that achieves widespread, incremental improvements to workers' conditions in their supply chains. Our focus is on determining what steps companies should take to do this, rather than on making claims about any of their products.

ETI Membership

- Call Membership Services to discuss your application[110]

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[109] ETI Base Code - https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Base%20Code%20%28English%29_0.pdf

[110] ETI Membership - https://www.ethicaltrade.org/join-eti/how-to-apply

- Submit a draft application by the next application deadline
- Your draft application is reviewed by the NGO and Trade union members of ETI
- Supply any further information requested
- Your application is sent to ETI Board members for consideration
- ETI Head of Membership Services presents your application at ETI's Board meeting
- Board decision is confirmed to the applicant

Please note that the process takes around 9 weeks from the submission of your draft application.

How ETI measures member companies' performance

Member companies must also submit biennial reports to the ETI Board which set out the steps they are taking to tackle working conditions in their supply chains.

- Who is driving the company's ethical trade strategy?
- How much money they have spent on ethical trade activities?
- What training they have given to staff and suppliers?
- What progress they have made in integrating ethical trade into their business practices?
- How they assess working conditions at their suppliers' work sites?
- How they ensure that any improvements requested of their suppliers have been made. Concrete changes to workers' conditions are recorded.

APPENDIX – 16 (LEATHER WORKING GROUP - LWG)

Leather Working Group is an international, not-for-profit membership organization responsible for the world's largest leather sustainability program. As a multi-stakeholder group, our members hail from across the global leather industry, including:

- Manufacturers of leather (aka, tanneries)
- Traders of part-processed and finished leather
- Manufacturers of leather garments, footwear and furniture
- Suppliers of chemicals, machinery and testing for the leather industry
- Brands and retailers that sell leather products to consumers
- Associations within and related to the leather industry.

Since 2005, LWG has identified environmental best practices in the industry and provided guidelines for continual improvement. It offers a suite of auditing tools to assess the environmental performance of leather manufacturing facilities – and certifies those that meet their standards.

LWG Audit Protocols

- **LWG Environmental Audit Protocol[111]** - assesses the environmental performance and compliance of leather manufacturing facilities (aka, tanneries).
- **LWG Trader Audit Protocol[112]** - assesses traders of part-processed & finished material and facilitates traceability through the supply chain.
- **LWG Subcontractor Audit Protocol[113]** - assesses the environmental performance of manufacturers completing subcontract work on behalf of other organisations that own the material.
- **LWG Commissioning Manufacturer Audit Protocol[114]** - assesses the performance of companies that buy leather and commission subcontractors to perform all manufacturing operations on the material, before selling it on.

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[111] Main Protocol - https://www.leatherworkinggroup.com/how-we-work/audit-protocols/main-protocol
[112] Trader Audit Protocol - https://www.leatherworkinggroup.com/how-we-work/audit-protocols/trader-protocol
[113] Sub-Contractor Audit Protocol - s https://www.leatherworkinggroup.com/how-we-work/audit-protocols/subcontractor-audit-protocol
[114] Commissioning Manufacturer Audit Protocol - https://www.leatherworkinggroup.com/how-we-work/audit-protocols/commissioning-manufacturer-audit-protocol

- **LWG Chemical Management Module**[115] - assesses the ability of leather manufacturing facilities to perform good chemical management and compliance.
- **LWG Tannery of the Future self-assessment** - a learning tool to allow leather manufacturers outside of the LWG membership to gain an understanding of the core principles of our auditing programme.

Tannery of the Future Initiative[116]

It is a self-assessment questionnaire designed to support tanneries who are looking to embark on their environmental journey but may not yet be ready to undergo the Leather Working Group (LWG) Environmental Audit.

Step 1: Self-Assessment

The first stage of LWG's stepping-stone programme is the Self-assessment checklist[117]. Leather Manufacturers can download the document & complete a self-evaluation of performance.

Online Assessment

Leather Manufacturers to complete the online assessment via the LWG Education Hub. Once successful, they are granted access to LWG meetings, communications and training materials for 2 years, during which time they are expected to undergo a full LWG Environmental Audit.

Step 2: Environmental Audit

Leather Manufacturers that have completed the online assessment will have 2 years to become LWG audited if they wish to benefit from membership of the group. It is also possible to have a full environmental audit without first undergoing the Step 1 Self-Assessments and Online Assessment.

Leather Working Group Ltd Membership Benefits & Costs

LWG Membership Proposal for details available at:

https://www.leatherworkinggroup.com/contentfiles/file/LWG-164.pdf

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[115] Chemical Manufacturing Module - https://www.leatherworkinggroup.com/how-we-work/audit-protocols/chemical-management-module
[116] Tannery of the Future - https://www.leatherworkinggroup.com/contentfiles/LWG-829.pdf?v=1
[117] Self-Assessment Questionnaire - https://www.leatherworkinggroup.com/how-we-work/tannery-of-the-future#request

APPENDIX – 17 (CEN CERTIFICATIONS ON LEATHER)

CEN/TC 289 Published Standards	
Reference, Title	**Publication date**
CEN/TS 14689:2006 (WI=00289070) Leather - Physical and mechanical tests - Determination of bagginess, creep and relaxation	2006-05-24
EN 13336:2012 (WI=00289097) Leather - Upholstery leather characteristics - Guide for selection of leather for furniture	2012-10-10
EN 14906:2012 (WI=00289108) Leather - Leather for automotive - Test methods and testing parameters	2012-05-23
EN 15987:2015 (WI=00289161) Leather - Terminology - Key definitions for the leather trade	2015-04-29
EN 16055:2012 (WI=00289127) Leather - Raw bovine hides and skins - Description, presentation and preservation	2012-01-25
EN 16223:2012 (WI=00289136) Leather - Requirements for the designation and description of leather in upholstery and automotive interior applications	2012-11-21
EN 16419:2014 (WI=00289142) Leather - Chamois leather for cleaning purposes - Classification and requirements	2014-01-22
EN 16483:2014 (WI=00289147) Leather - Labelling of leather trims in textile products	2014-01-22
EN 16484:2015 (WI=00289153) Leather - Requirements for the determination of the origin of leather production	2015-11-04
EN 16887:2017 (WI=00289162) Leather - Environmental footprint - Product Category Rules (PCR) - Carbon footprints	2017-03-22
EN ISO 11640:2018 (WI=00289192) Leather - Tests for colour fastness - Colour fastness to cycles of to-and-fro rubbing (ISO 11640:2018)	2018-09-19
EN ISO 11641:2012 (WI=00289124) Leather - Tests for colour fastness - Colour fastness to perspiration (ISO 11641:2012)	2012-11-15
EN ISO 11642:2012 (WI=00289125) Leather - Tests for colour fastness - Colour fastness to water (ISO 11642:2012)	2012-11-15
EN ISO 11643:2009 (WI=00289091) Leather - Tests for colour fastness - Colour fastness of small samples to solvents (ISO 11643:2009)	2009-05-15
EN ISO 11644:2009 (WI=00289092) Leather - Test for adhesion of finish (ISO 11644:2009)	2009-05-15
EN ISO 11646:2014 (WI=00289146) Leather - Measurement of area (ISO 11646:2014)	2014-03-05
EN ISO 13365-1:2020 (WI=00289199) Leather - Chemical determination of the preservative (TCMTB, PCMC, OPP, OIT) content in leather by liquid chromatography - Part 1: Acetonitrile extraction method (ISO 13365-1:2020)	2020-09-09
EN ISO 13365-2:2020 (WI=00289200) Leather - Chemical determination of the preservative (TCMTB, PCMC, OPP, OIT) content in leather by liquid chromatography - Part 2: Artificial perspiration extraction method (ISO 13365-2:2020)	2020-09-02
EN ISO 14087:2011 (WI=00289120) Leather - Physical and mechanical tests - Determination of bending force (ISO 14087:2011)	2011-12-01
EN ISO 14088:2020 (WI=00289211) Leather - Chemical tests - Quantitative analysis of tanning agents by filter method (ISO 14088:2020)	2020-04-08

EN ISO 14268:2012 (WI=00289122) Leather - Physical and mechanical tests - Determination of water vapour permeability (ISO 14268:2012)	2012-11-01
EN ISO 14931:2015 (WI=00289130) Leather - Guide to the selection of leather for apparel (excluding furs) (ISO 14931:2015)	2015-03-04
EN ISO 15700:1999 (WI=00289058) Leather - Tests for colour fastness - Colour fastness to water spotting (ISO 15700:1998)	1999-08-18
EN ISO 15701:2015 (WI=00289149) Leather - Tests for colour fastness - Colour fastness to migration into polymeric material (ISO 15701:2015)	2015-04-22
EN ISO 15702:1999 (WI=00289060) Leather - Tests for colour fastness - Colour fastness to machine washing (ISO 15702:1998)	1999-08-18
EN ISO 15703:1999 (WI=00289059) Leather - Tests for colour fastness - Colour fastness to mild washing (ISO 15703:1998)	1999-08-18
EN ISO 17070:2015 (WI=00289148) Leather - Chemical tests - Determination of tetrachlorophenol-, trichlorophenol-, dichlorophenol-, monochlorophenol-isomers and pentachlorophenol content (ISO 17070:2015)	2015-02-25
EN ISO 17071:2011 (WI=00289134) Leather - Physical and mechanical tests - Determination of fogging characteristics (ISO 17071:2006)	2011-09-14
EN ISO 17072-1:2019 (WI=00289201) Leather - Chemical determination of metal content - Part 1: Extractable metals (ISO 17072-1:2019)	2019-04-03
EN ISO 17072-2:2019 (WI=00289202) Leather - Chemical determination of metal content - Part 2: Total metal content (ISO 17072-2:2019)	2019-04-03
EN ISO 17074:2011 (WI=00289133) Leather - Physical and mechanical tests - Determination of resistance to horizontal spread of flame (ISO 17074:2006)	2011-09-14
EN ISO 17075-1:2017 (WI=00289180) Leather - Chemical determination of chromium(VI) content in leather - Part 1: Colorimetric method (ISO 17075-1:2017)	2017-02-15
EN ISO 17075-2:2017 (WI=00289182) Leather - Chemical determination of chromium(VI) content in leather - Part 2: Chromatographic method (ISO 17075-2:2017)	2017-02-22
EN ISO 17076-1:2020 (WI=00289212) Leather - Determination of abrasion resistance - Part 1: Taber® method (ISO 17076-1:2020)	2020-01-29
EN ISO 17076-2:2011 (WI=00289119) Leather - Determination of abrasion resistance - Part 2: Martindale ball plate method (ISO 17076-2:2011)	2011-06-15
EN ISO 17130:2013 (WI=00289139) Leather - Physical and mechanical tests - Determination of dimensional change (ISO 17130:2013)	2013-05-01
EN ISO 17131:2020 (WI=00289224) Leather - Identification of leather with microscopy (ISO 17131:2020)	2020-04-15
EN ISO 17186:2011 (WI=00289107) Leather - Physical and mechanical tests - Determination of surface coating thickness (ISO 17186:2011)	2011-12-15
EN ISO 17226-1:2019 (WI=00289203) Leather - Chemical determination of formaldehyde content - Part 1: Method using high performance liquid chromatography (ISO 17226-1:2018)	2019-02-06
EN ISO 17226-2:2019 (WI=00289204) Leather - Chemical determination of formaldehyde content - Part 2: Method using colorimetric analysis (ISO 17226-2:2018)	2019-02-06
EN ISO 17226-3:2011 (WI=00289116) Leather - Chemical determination of formaldehyde content - Part 3: Determination of formaldehyde emissions from leather (ISO 17226-3:2011)	2011-05-15
EN ISO 17227:2002 (WI=00289043) Leather - Physical and mechanical tests - Determination of dry heat resistance of leather (ISO 17227:2002)	2002-12-15

EN ISO 17228:2015 (WI=00289159) Leather - Tests for colour fastness - Change in colour with accelerated ageing (ISO 17228:2015)	2015-03-04
EN ISO 17229:2016 (WI=00289186) Leather - Physical and mechanical tests - Determination of water vapour absorption (ISO 17229:2016)	2016-03-09
EN ISO 17230:2011 (WI=00289135) Leather - Physical and mechanical tests - Determination of water penetration pressure (ISO 17230:2006)	2011-09-14
EN ISO 17231:2017 (WI=00289193) Leather - Physical and mechanical tests - Determination of water repellency of garment leather (ISO 17231:2017)	2017-09-20
EN ISO 17232:2017 (WI=00289178) Leather - Physical and mechanical tests - Determination of heat resistance of patent leather (ISO 17232:2017)	2017-02-15
EN ISO 17233:2017 (WI=00289177) Leather - Physical and mechanical tests - Determination of cold crack temperature of surface coatings (ISO 17233:2017)	2017-02-15
EN ISO 17234-1:2020 (WI=00289216) Leather - Chemical tests for the determination of certain azo colourants in dyed leathers - Part 1: Determination of certain aromatic amines derived from azo colorants (ISO 17234-1:2020)	2020-09-16
EN ISO 17234-2:2011 (WI=00289110) Leather - Chemical tests for the determination of certain azo colorants in dyed leathers - Part 2: Determination of 4-aminoazobenzene (ISO 17234-2:2011)	2011-03-15
EN ISO 17235:2015 (WI=00289173) Leather - Physical and mechanical tests - Determination of softness (ISO 17235:2015)	2015-09-16
EN ISO 17236:2016 (WI=00289187) Leather - Physical and mechanical tests - Determination of extension set (ISO 17236:2016)	2016-03-09
EN ISO 17489:2013 (WI=00289143) Leather - Chemical tests - Determination of tan content in synthetic tanning agents (ISO 17489:2013)	2013-11-06
EN ISO 17502:2013 (WI=00289141) Leather - Determination of surface reflectance (ISO 17502:2013)	2013-05-08
EN ISO 18218-1:2015 (WI=00289155) Leather - Determination of ethoxylated alkylphenols - Part 1: Direct method (ISO 18218-1:2015)	2015-06-17
EN ISO 18218-2:2019 (WI=00289191) Leather - Determination of ethoxylated alkylphenols - Part 2: Indirect method (ISO 18218-2:2019)	2019-07-10
EN ISO 18219:2015 (WI=00289157) Leather - Determination of chlorinated hydrocarbons in leather - Chromatographic method for short-chain chlorinated paraffins (SCCP) (ISO 18219:2015)	2015-10-21
EN ISO 19070:2016 (WI=00289166) Leather - Chemical determination of N-methyl-2-pyrrolidone (NMP) in leather (ISO 19070:2016)	2016-04-06
EN ISO 19071:2016 (WI=00289169) Leather - Chemical tests - Determination of chromium (VI) and the reductive potential for chromium tanning agents (ISO 19071:2016)	2016-04-06
EN ISO 19074:2015 (WI=00289172) Leather - Physical and mechanical tests - Determination of water absorption by capillary action (wicking) (ISO 19074:2015)	2015-09-16
EN ISO 19076:2016 (WI=00289167) Leather - Measurement of leather surface - Using electronic techniques (ISO 19076:2016)	2016-08-31
EN ISO 20136:2020 (WI=00289217) Leather - Determination of degradability by micro-organisms (ISO 20136:2020)	2020-07-15
EN ISO 20137:2017 (WI=00289181) Leather - Chemical tests - Guidelines for testing critical chemicals in leather (ISO 20137:2017)	2017-03-22
EN ISO 20433:2012 (WI=00289140) Leather - Tests for colour fastness - Colour fastness to crocking (ISO 20433:2012)	2012-10-01

EN ISO 20701:2018 (WI=00289190) Leather - Tests for colour fastness - Colour fastness to saliva (ISO 20701:2017)	2018-02-14
EN ISO 22700:2019 (WI=00289209) Leather - Measuring the colour and colour difference of finished leather (ISO 22700:2019)	2019-04-17
EN ISO 23702-1:2018 (WI=00289206) Leather - Organic fluorine - Part 1: Determination of non-volatile compounds by extraction method using liquid chromatography/tandem mass spectrometry detector (LC-MS/MS) (ISO 23702-1:2018)	2018-11-21
EN ISO 23910:2019 (WI=00289205) Leather - Physical and mechanical tests - Measurement of stitch tear resistance (ISO 23910:2019)	2019-07-03
EN ISO 2417:2016 (WI=00289183) Leather - Physical and mechanical tests - Determination of the static absorption of water (ISO 2417:2016)	2016-03-16
EN ISO 2418:2017 (WI=00289174) Leather - Chemical, physical and mechanical and fastness test - Sampling location (ISO 2418:2017)	2017-02-15
EN ISO 2419:2012 (WI=00289131) Leather - Physical and mechanical tests - Sample preparation and conditioning (ISO 2419:2012)	2012-02-01
EN ISO 2420:2017 (WI=00289176) Leather - Physical and mechanical tests - Determination of apparent density and mass per unit area (ISO 2420:2017)	2017-02-15
EN ISO 2588:2014 (WI=00289160) Leather - Sampling - Number of items for a gross sample (ISO 2588:2014)	2014-07-16
EN ISO 2589:2016 (WI=00289184) Leather - Physical and mechanical tests - Determination of thickness (ISO 2589:2016)	2016-03-16
EN ISO 26082-1:2019 (WI=00289213) Leather - Physical and mechanical test methods for the determination of soiling - Part 1: Rubbing (Martindale) method (ISO 26082-1:2019)	2019-04-17
EN ISO 26082-2:2012 (WI=00289132) Leather - Physical and mechanical test methods for the determination of soiling - Part 2: Tumbling method (ISO 26082-2:2012)	2012-07-01
EN ISO 27587:2009 (WI=00289093) Leather - Chemical tests - Determination of the free formaldehyde in process auxiliaries (ISO 27587:2009)	2009-10-15
EN ISO 3376:2020 (WI=00289210) Leather - Physical and mechanical tests - Determination of tensile strength and percentage elongation (ISO 3376:2020)	2020-05-20
EN ISO 3377-1:2011 (WI=00289105) Leather - Physical and mechanical tests - Determination of tear load - Part 1: Single edge tear (ISO 3377-1:2011)	2011-12-15
EN ISO 3377-2:2016 (WI=00289185) Leather - Physical and mechanical tests - Determination of tear load - Part 2: Double edge tear (ISO 3377-2:2016)	2016-03-16
EN ISO 3378:2002 (WI=00289064) Leather - Physical and mechanical tests - Determination of resistance to grain cracking and grain crack index (ISO 3378:2002)	2002-12-15
EN ISO 3379:2015 (WI=00289170) Leather - Determination of distension and strength of surface (Ball burst method) (ISO 3379:2015)	2015-09-16
EN ISO 3380:2015 (WI=00289150) Leather - Physical and mechanical tests - Determination of shrinkage temperature up to 100 °C (ISO 3380:2015)	2015-09-16
EN ISO 4044:2017 (WI=00289179) Leather - Chemical tests - Preparation of chemical test samples (ISO 4044:2017)	2017-01-25
EN ISO 4045:2018 (WI=00289194) Leather - Chemical tests - Determination of pH and difference figure (ISO 4045:2018)	2018-06-06
EN ISO 4047:1998 (WI=00289062) Leather - Determination of sulphated total ash and sulphated water-insoluble ash (ISO 4047:1977)	1998-09-23

EN ISO 4048:2018 (WI=00289195) Leather - Chemical tests - Determination of matter soluble in dichloromethane and free fatty acid content (ISO 4048:2018)	2018-07-18
EN ISO 4098:2018 (WI=00289188) Leather - Chemical tests - Determination of water-soluble matter, water-soluble inorganic matter and water-soluble organic matter (ISO 4098:2018)	2018-07-11
EN ISO 4684:2005 (WI=00289061) Leather - Chemical tests - Determination of volatile matter (ISO 4684:2005)	2005-11-01
EN ISO 5398-1:2018 (WI=00289196) Leather - Chemical determination of chromic oxide content - Part 1: Quantification by titration (ISO 5398-1:2018)	2018-07-18
EN ISO 5398-2:2009 (WI=00289074) Leather - Chemical determination of chromic oxide content - Part 2: Quantification by colorimetric determination (ISO 5398-2:2009)	2009-01-15
EN ISO 5398-3:2018 (WI=00289197) Leather - Chemical determination of chromic oxide content - Part 3: Quantification by atomic absorption spectrometry (ISO 5398-3:2018)	2018-07-18
EN ISO 5398-4:2019 (WI=00289198) Leather - Chemical determination of chromic oxide content - Part 4: Quantification by inductively coupled plasma (ICP) (ISO 5398-4:2018)	2019-02-06
EN ISO 5402-1:2017 (WI=00289175) Leather - Determination of flex resistance - Part 1: Flexometer method (ISO 5402-1:2017)	2017-02-15
EN ISO 5402-2:2015 (WI=00289158) Leather - Determination of flex resistance - Part 2: Vamp flex method (ISO 5402-2:2015)	2015-10-07
EN ISO 5403-1:2011 (WI=00289102) Leather - Determination of water resistance of flexible leather - Part 1: Repeated linear compression (penetrometer) (ISO 5403-1:2011)	2011-12-15
EN ISO 5403-2:2011 (WI=00289101) Leather - Determination of water resistance of flexible leather - Part 2: Repeated angular compression (Maeser) (ISO 5403-2:2011)	2011-12-15
EN ISO 5404:2011 (WI=00289103) Leather - Physical test methods - Determination of water resistance of heavy leathers (ISO 5404:2011)	2011-12-15