

About Nordic Swan Ecolabelled  
**Textiles, hides/skins, and leather**



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In 1989, the Nordic Council of Ministers decided to introduce a voluntary official ecolabel, the Nordic Swan Ecolabel. These organisations/companies operate the Nordic Ecolabelling system on behalf of their own country's government. For more information, see the websites:

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# 1 Summary

Nordic Swan Ecolabelling of textiles is a highly relevant. The textile industry has realised that something must be done about achieving more sustainable textile production and consumption. The focus areas for the industry are:

1. Sustainable fibre
2. Substitution of hazardous chemicals
3. Reduction in energy and water consumption
4. Recycling and a circular economy
5. Responsible production in terms of workers' rights
6. Focus on quality and slow fashion rather than fast fashion

Brands vary in how many of these areas they tackle. Since the Nordic Swan Ecolabelling of textiles evaluate the entire life cycle of the textile, and all the relevant sustainability parameters, the criteria deal with all six areas listed above.

## **New fibre requirements**

This 5<sup>th</sup> generation of Nordic Swan Ecolabelling for Textiles, hides/skins and leather includes newly developed requirements concerning textile fibres. The fibres in Nordic Swan Ecolabelled textiles must be either organic, recycled, or biobased meeting other relevant environmental requirements. This means, in part, that:

Cotton must be 100% organic or recycled. Only selected textiles for professional use may, alternatively, be made from fibre 100% certified by either BCI (Better Cotton Initiative), FairTrade cotton or CmiA (Cotton Made in Africa). Synthetic fibre must be based on either recycled or bio-based materials. With a test requirement for specific chemicals in recycled fibres as well as requirements for the bio-based raw material.

Regenerated cellulose fibre must be recycled or FSC or PEFC certified, and the actual fibre production must be with closed loop technology if the fibre constitutes more than 30% of the total fibre content.

## **Updated chemical requirements**

The following three requirements are tightened and covers all the chemicals in the textile production:

Chemicals with undesirable classifications such as toxic, carcinogenic and harmful to the aquatic environment are prohibited.

Chemicals classified as CMR substances are prohibited.

It must be clearly demonstrated that none of the 11 groups of substances from Greenpeace's Detox My Fashion campaign<sup>1</sup> have been used in the production of Nordic Swan Ecolabelled textiles.

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<sup>1</sup> Destination Zero: Seven Years of Detoxing the Clothing Industry, [https://storage.googleapis.com/planet4-international-stateless/2018/07/destination\\_zero\\_report\\_july\\_2018.pdf](https://storage.googleapis.com/planet4-international-stateless/2018/07/destination_zero_report_july_2018.pdf) accessed 07.08.2019

As in the previous generation of the criteria, the chemical requirements in the new generation use a definition of ingoing substances that entails a ban on specific ingoing substances down to 0 ppm. As such, a safety data sheet alone is not enough to meet the documentation requirement. Further information about the chemicals will always be needed. Other certifications that do not require chemical documentation down to the same level will therefore not be permissible as documentation for these requirements.

### **Sharpening of the requirements for energy and water consumption**

The requirement concerning energy and water consumption has been expanded to include a requirement on implementation of a minimum of BAT practices to reduce energy and water consumption. This means that the textile production must be water- and energy-efficient and thus deliver reduced CO<sub>2</sub> emissions.

### **Textiles and a circular economy**

In addition to recycled fibres, it is now also possible to use reused textiles to make new textiles, with some requirements for either a previous certification or restrictions on which products it can be used. There is also a requirement that unsold textiles must not be sent for incineration or to landfill and that the brand owner must be transparent about this.

In addition, the requirements on the prohibition of unnecessary details/accessories on the textile and the strict requirements on the chemicals used, coupled with the quality requirements, support a circular economy.

### **Requirements for brand owner – new licence structure**

The textile manufacturer and brand owner must each hold their own type of licence. The brand owner is now subject to requirements that ensure the traceability of the Nordic Swan Ecolabelled product on the market.

## **2 Motives for the Nordic Swan Ecolabelling of textiles, hides/skins, and leather**

The description of what characterizes Nordic Swan Ecolabelled textiles, skins and leather is divided into 2 product areas:

1. Textiles - with specific communication for textiles for consumer and for professionals
2. Skins and leather

### **Nordic Swan Ecolabelled textiles**

Nordic Swan Ecolabelled textiles have reduced environmental impact throughout the lifecycle of the textile. Among other things, through strict requirements for fibers and chemicals. At the same time, the textile producer must ensure that production complies with UN's International Labour Organization (ILO) conventions on workers' rights.

The requirements promote a more circular economy, reduce climate impact, and save resources: Textiles with the Nordic Swan Ecolabel must be suited for a long lifetime and the quality is therefore tested and documented. Recycled fibres and reused textile can be used in the Nordic Swan Ecolabelled product if it complies

with requirements to previously used chemicals. At the same time several of the Nordic Swan Ecolabel requirements support that the textile can be used in new resource loops after use and the textile production itself must be energy efficient.

**The requirements for textiles include such as:**

- Made from fibres, that are either organic, recycled or based on renewable resources complying with specific environmental requirements.
- Meets strict environmental and health requirements for chemicals used in textile production - this is important for wastewater, the people who produce the textiles and those who wear them.
- Meet strict requirements for substances that are classified carcinogeni, toxic to reproduction and can damage genetic material. Identified and potential endocrine disruptors on up-to-date lists from EU and national authorities are excluded. Also, flame retardants, fluorinated substances, and antibacterial additives incl. nanoparticles are excluded.
- Produced with water and energy efficient technology, which saves water and reduces CO2 emissions.
- Quality tested to enable a long lifetime.
- Only contain metal parts – e.g., zippers and buttons - that meet strict requirements for heavy metals, and plastic parts are without phthalates.
- Is produced under proper working conditions, where UN's International Labour Organizations (ILO) conventions on workers' rights has been complied with.
- Unsold textiles must not be sent for incineration or dumped in landfill. This motivates to avoid overproduction.

**Nordic Swan Ecolabelled textiles contribute to circular economy by:**

- the use of either recycled or bio-based raw materials,
- strict control of the chemicals included in the textile,
- quality test of the finished textile
- prohibition of plastic and metal applications if only for decorating.
- unsold Nordic Swan Ecolabelled textiles must not be burnt or sent to landfill.
- packaging must be designed for recycling

**Nordic Swan Ecolabelled products of skins and leather**

Nordic Swan Ecolabelled skins and leather have reduced environmental impact throughout the life cycle. Among other things, through strict requirements for the production of skins and leather and chemicals used. At the same time, the UN's International Labour Organizations (ILO) conventions on workers' rights must be complied with in the production of hides and skins.

The requirements promote a more circular economy, reduce climate impact, and save resources: Only skins and leather which are residuals or by-products, or comes from reindeer and elk can be Nordic Swan Ecolabelled. Skins and leather with the Nordic Swan Ecolabel must have the ability to have long lifetime, and the quality is therefore tested and documented. Reused skins and leather can be used for re-design in the Nordic Swan Ecolabelled product if it complies with requirements to previously used chemicals. Several of the Nordic Swan Ecolabel requirements support that skins and leather can be used in new resource loops after ended use.

### **Nordic Swan Ecolabelled products in hide/skin and leather:**

- Are produced by residuals or by-products or skins from free-living, non-endangered species.
- Meet strict requirements for substances that are classified carcinogenic, toxic to reproduction and can damage genetic material. Identified and potential endocrine disruptors on up-to-date lists from EU and national authorities are excluded. Also, flame retardants and fluorinated substances are excluded.
- Meets strict environmental and health requirements for chemicals in the tanning process, but also for dyes, coatings, solvents, and biocides. This is important for wastewater, the people who produce the products and those who use them.
- Are tested free of chromium VI, which can be allergenic.
- Meets strict requirements for wastewater treatment from tanneries.
- Only contain metal parts – e.g., zippers and buttons - that meet strict requirements for heavy metals, and plastic parts are without phthalates.
- Quality tested to enable a long lifetime.
- Is produced under proper working conditions, where UN's International Labour Organizations (ILO) conventions on workers' rights has been complied with.
- Unsold skin and leather must not be sent for incineration or dumped in landfill. This motivates to avoid overproduction.

### **Nordic Swan Ecolabelled skin and leather contribute to circular economy by:**

- Only residues and by-products or skins from free-living non-endangered species are used
- Possibility of re-design of recycled skins and leather for selected product types
- Strict control of which chemicals have been used and are included in the finished product
- Quality test of the finished skin and leather
- Prohibition on the use of plastic and metal applications without function on the leather
- Unsold skins and leather must not be sent for incineration or landfill

## **2.1 UN's Sustainable Development Goals**



The Nordic Swan Ecolabel actively contributes to fulfilment of Goal 12 to “Ensure sustainable consumption and production patterns”.

Nordic Swan Ecolabelled textiles, hides/skins and leather have a reduced environmental footprint throughout the life cycle of the textile – from fibre production and textile production to requirements ensuring the high quality of textiles, so it can last a long lifetime. The Nordic Swan Ecolabel encourages reuse and recycling without the spread of harmful chemicals.

## How Nordic Swan Ecolabelled textiles, hides/skins and leather contribute to Goal 12

Here, the focus is on sustainable and efficient utilization of resources by the fact that the fibres in the textile must be either organic, recycled, or biobased, complying with specific environmental requirements.

At the same time, the textile production must use water- and energy efficiency technologies or use self-produced solar energy and if packaging it used it must be designed so that it can be recycled today.

A long list of chemicals that are harmful to health and the environment are prohibited in the production of the textile. All the chemicals in the textile production are checked regarding their environmental and health effects. For example, all the substances on Greenpeace's Detox List are prohibited. In addition, the detergents and softeners used in the wet processes must be biodegradable. This ensures responsible handling of the chemistry throughout the life cycle of the textile, with a positive impact on human health and the environment.

Nordic Swan Ecolabelled textiles shall contribute to more sustainable consumption patterns and therefore could be used for a long time. Hence the quality is tested for properties such as abrasion resistance, colour fastness and shrinkage.

Unsold Nordic Swan Ecolabelled textiles must not be sent for incineration or landfill. This is for reducing overproduction and promote recycling of textiles.



Contributes to goal 3 by reducing exposure to hazardous chemicals



Contributes to sustainable management of water, by promoting water-saving technologies, requirement for wastewater treatment and strict requirements for harmful chemicals.



The working conditions in the textile production must comply with relevant workers' rights as set out in the ILO Core Conventions. E.g. this includes a ban on child labour and forced labour.



Promotes energy efficiency in the textile production and the use of local produced solar energy.



Strict chemical requirements in the textile production reduce discharges of unwanted chemicals into the sea.





Requirements for certified raw materials promoting sustainable use of areas and conservation of areas that are particularly important for biodiversity.

### 3 Environmental impact of Nordic Swan Ecolabelled textiles, hides/skins, and leather

The textile industry is one of the largest industries in the world, with as many as 100 million tonnes of textiles making their way onto the global market annually. At the same time, the fashion and textile industry are one of the most polluting and resource-heavy industries in the world and its scale alone says something about the environmental impact associated with the textile industry.

#### **Increasing consumption**

The Nordic region has a high consumption of textiles. The average annual consumption per inhabitant in the Nordic countries ranges from 13 to 16 kg of new textiles (clothing and household textiles)<sup>2</sup>. Fast fashion, whereby several trend-based collections are launched each year, is one of the things stimulating the increasing consumption of textiles. Slow fashion is now growing as a counterpoint to fast fashion, with more and more fashion brands and consumers focusing on the quality and long lifetime of the textile.

#### **Environmentally harmful production**

The LCA study “Advancing life cycle assessment of textile products to include textile chemicals”, in which Sandra Roos of Chalmers University of Technology includes the environmental impact of chemicals, states that the greatest environmental impact from textiles is associated with their actual production. The primary impacts come from the use and discharge of harmful chemicals and the use of water and energy in the textile production<sup>3</sup>. Energy consumption is significant for both resource consumption and emissions of greenhouse gases. The greatest impact on the climate change thus comes from the textile production, including all the wet processes. Next comes the contribution from transport of the textile from the retailer home to the consumer.

Cultivation of cotton is one of the most problematic processes in the production chain for textiles. The cultivation of conventional cotton requires intensive use of both water and chemicals. Similarly, wet processes (bleaching, dyeing, and finishing) in textile production often have a significant impact on the environment. In addition to making intensive use of water and chemicals, the wet processes can also involve high levels of energy consumption.

It is estimated that between 1.5 kg and 6.9 kg of chemicals are used to produce 1 kg of finished clothing. As such, the chemicals used in production will often weigh considerably more than the textile itself<sup>4</sup>.

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<sup>2</sup> NMR 2014, Towards a new Nordic textile commitment: Collection, sorting, reuse, and recycling

<sup>3</sup> Advancing life cycle assessment of textile products to include textile chemicals, CHALMERS UNIVERSITY OF TECHNOLOGY 2016

<sup>4</sup> Advancing life cycle assessment of textile products to include textile chemicals, CHALMERS UNIVERSITY OF TECHNOLOGY 2016.

Not all LCA studies of textiles have the same focus on chemicals. When using LCA studies as a tool for assessing a textile's environmental impact across its life cycle, it is important to note that endocrine disruption, allergens, and other harmful properties in the chemicals used are often poorly handled in the analysis. There is thus a risk that LCA tools do not give the best picture of where to target environmental improvements most usefully in the textile's life cycle<sup>5</sup>. In relation to ecolabelling, there is therefore a need to combine LCA studies with a more specific chemical analysis that examines both how problematic the chemistry is and the options for substitution.

The Swedish Chemicals Agency has identified 2,450 different chemicals that are used in textile production. 1,150 of these are identified as harmful and 368 are functional chemicals such as dyes, impregnation agents and anti-bacterial treatments. These chemicals are present in the finished textile and therefore may pose a potential risk to consumers and the environment in the use stage. Chemicals with no function in the end product may also be present in the textile, with a potential risk to health and the environment<sup>6</sup>. As an example, several studies indicate that allergic reactions to chemicals and textiles may be a problem<sup>7</sup>.

The Dirty Laundry report published by Greenpeace International<sup>8</sup> focuses on the discharge of harmful chemicals in wastewater from Chinese wet processing plants as part of textile production. A later study, also by Greenpeace, shows the presence of per- and polyfluorinated compounds (PFASs) in all the analysed snow samples and many water samples taken in the mountain areas of 10 countries on three continents<sup>9</sup>. Greenpeace describes how even major textile brands with CSR programmes lack an effective strategy to ensure that the textiles they source from China do not lead to harmful substances polluting watercourses. The study also states that harmful chemicals with persistent or endocrine disrupting properties were found in wastewater samples from the factories. Even wastewater from factories with modern wastewater treatment systems was found to contain alkylphenols and polyfluorinated compounds such as PFOA and PFOS<sup>10</sup>. With its Detox Catwalk campaign in 2010, Greenpeace urged the global textile industry to phase out 11 harmful chemical groups by 2020 (see more in section 4.1).

### 3.1 Qualitative MECO analysis for textiles

A qualitative MECO analysis has been conducted for textiles in general. This describes the key areas that impact on health and the environment throughout the life cycle of the textiles – including consumption of materials/resources (M), energy (E), chemicals (C) and other impact areas (O) such as microplastics and biodiversity. The product group covers many different types of textiles, hide/skin, and leather products. These may include everything from clothing to home furnishings and professional textiles such as workwear to bags, gloves, and

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<sup>5</sup> Advancing life cycle assessment of textile products to include textile chemicals, CHALMERS UNIVERSITY OF TECHNOLOGY 2016.

<sup>6</sup> Norden – velklædt i et rent miljø, Handlingsplan for bæredygtig mode og tekstil, Nordic Council of Ministers 2015.

<sup>7</sup> Kemi 2014, Chemicals in textiles – Risks to human health and the environment.

<sup>8</sup> Greenpeace International (2011) Dirty Laundry: the toxic secret behind global textile brands.

<sup>9</sup> Greenpeace International (2015) Footprints in the snow.

<sup>10</sup> Greenpeace International (2011) Dirty Laundry: the toxic secret behind global textile brands.

upholstery fabrics. It is therefore not possible to perform a quantitative analysis that covers all these product types. The decision was thus taken to conduct a qualitative MECO analysis showing the key environmental and health impacts associated with the product group, without quantifying these impacts. The magnitude of the stated impacts depends on many factors, such as the choice of fibre type, fibre thickness and density, the choice of textile chemicals, finishing treatments, technology and production processes, design and the collection or waste systems in the respective countries.

The table shows that the choice of fibre type affects the kind of environmental impact that the raw material stage contributes. Here, resource consumption comes either in the form of crude oil for fossil synthetic fibre production or land use and the risk of biodiversity losses due to the use of renewable raw materials. Both the cultivation of raw materials and the production of synthetic fibres require energy, with harmful chemicals from pesticides and production chemicals another relevant factor for consideration. When it comes to animal fibres, it is also important to consider animal welfare, for example with regard to sheep.

**Table 2: Qualitative MECO matrix for the life cycle of textiles**

	Raw material phase	Production	Use phase	Waste and recycling phase
<b>Raw materials/ inputs</b>	Crude oil (synthetic fossil fibres) Wood raw material (cellulose-based fibres) Land use (vegetable fibres, silk, and wool) Water (cotton and other vegetable fibres) Energy resources for extraction, cultivation, and fertilisation	Energy resources for production Water for wet processes	Energy resources and water for washing and poss. energy resources for drying	Either landfill, incineration, or recycling of textile fibres. A small proportion is reused
<b>Energy</b>	Energy for production of synthetic fibres and farming for vegetable fibres and wool	Energy for the processes, spinning, weaving/knitting, dyeing, finishing, and manufacturing	Energy for washing and poss. drying	Loss of resources due to landfill and incineration Energy recovery from incineration of textile fibre Energy and resource savings through reuse of textile fibres
<b>Chemicals</b>	Cotton and wood raw material for cellulose and any other vegetable raw materials: Pesticides for cultivation Wool: Organophosphates and pyrethroids for treatment. COD emissions from wool scouring plants. Acrylic fibres: DMAc and acrylonitrile Elastane fibres: Organotin compounds, emission of aromatic diisocyanates to air, DMAc Polyamide fibres: N2O emissions to air Polyester fibres: antimony, VOC	Chlorine treatment of wool. Emissions of chemicals from the wet processes that are harmful to health and the environment E.g. carcinogenic azo dyes (amines) PFAS for resistance to water, dirt and grease Phthalates in print or plastic detailing.	Exposure to chemicals that are harmful to health: antibacterial biocides (silver ions, triclosan or triclocarban), PFAS, NPEO, allergenic dyes, CMR substances and endocrine disruptors Detergents for washing the textiles	Risk of passing undesirable chemicals onwards in the lifecycle using textiles with no traceability. Potential to reduce chemical impact from raw material phase by reusing textile fibres

	Raw material phase	Production	Use phase	Waste and recycling phase
	<p>Polypropylene: lead-based pigments</p> <p>Cellulose fibre: chlorine gas, sulphur emissions, zinc emissions to water, copper emissions to water</p> <p>Membranes coated with fluorinated substances</p>	<p>Pesticides, heavy meals, or pH-changing chemicals</p>		
<b>Other</b>	<p>Animal welfare in farming (e.g., sheep). Also relevant for birds in the case of fillings (feathers).</p> <p>Sustainable cultivation of raw materials, not least to ensure biodiversity and protection of natural areas.</p>	<p>Temp. changes in aquatic environment (wet processes).</p> <p>Social and ethical challenges associated with working conditions for production outside the EU.</p>	<p>Microplastics from textile wear and washing.</p>	

### 3.2 RPS analysis

Nordic Ecolabelling sets requirements concerning the topics and processes in the life cycle that have a high environmental impact – also called hotspots. An RPS tool is used to identify where ecolabelling can have the greatest effect. R represents the environmental relevance; P is the potential to reduce the environmental impact and S is the steerability on how compliance with a requirement can be documented and followed up.

Therefore, it makes sense for the criteria to contain requirements in areas in the life cycle that have been found to have a high overall RPS, since there is potential to achieve positive environmental gains. The table below provides an overview of the key areas where requirements are appropriate due to a high RPS.

#### Location of high RPS

Raw materials stage	
<b>Fibre type</b>	<p>There is high relevance for the production/cultivation of textile fibres, but considerable variation in the type of environmental impact, depending on the type of fibre. It is difficult to pick out one fibre type as the best option on every environmental impact category. In terms of environmental impact from the textile fibres, the potential for greatest steerability lies in ensuring that the individual fibre type is either cultivated or produced in the least environmentally impactful way possible.</p> <p><b>RPS for natural fibre requirements</b></p> <ul style="list-style-type: none"> <li>- Here, a high RPS has been found for requiring 100% organic cotton for textiles for retail and professional fabrics – either 100% organic or IPM cotton.</li> <li>- For flax and other bast fibres, there is RPS for specific requirements concerning cultivation and processing.</li> <li>- Animal fibres such as wool and other keratin fibres demonstrate a high RPS for requirements on the level of residues of pesticides against parasites in the wool, as well as COD and detergent discharges in wastewater.</li> </ul> <p><b>RPS for synthetic fibre requirements</b></p> <ul style="list-style-type: none"> <li>- Synthetic fibres are subject to the requirement that either they must be bio-based or recycled materials are used in production.</li> <li>- For bio-based fibres, there are also requirements stipulating the types of raw materials that may be used and that they must not be cultivated using genetically modified raw materials.</li> <li>- Recycled fibres are required to have been tested for content of undesirable chemicals.</li> </ul>

	- For regenerated cellulose fibre, the production process must be free from discharges and the wood fibre must be sourced from sustainable forestry.
<b>Textile production</b>	
<b>Chemicals that are harmful to health and the environment</b>	<p>In this area, tackling harmful chemicals in textile production has high relevance, and there is also potential to set chemical requirements for textile production that exclude a wide range of chemical substances.</p> <p>To ensure that harmful chemicals are not discharged from wet processes, the greatest steerability as regards ecolabelling lies in ensuring that the harmful chemicals, such as organic fluorinated compounds and heavy metals, are not used in the processes. This ensures that these chemicals are not discharged into the aquatic environment and that they are not present in the finished textile that the consumer is in contact with. The Nordic Swan Ecolabel's chemical requirements, under which a ban means 0 ppm of the constituent chemical substances, provide high steerability.</p> <p>Testing for chemicals in wastewater is also an option but provides only a snapshot and would be a major undertaking if all the excluded substances had to be tested for.</p> <p>Here there is both potential and steerability in requiring that the detergents and softeners used in the textile production must be readily degradable in the wastewater treatment plant, so that they do not end up in the aquatic environment. Potential and steerability also exist for requirements concerning COD, temperature, and pH in wastewater from wet processes.</p>
<b>Energy and water consumption</b>	Overall, a high RPS has been found for requiring that the textile production uses a minimum of best available water and energy efficiency technologies or has measures in place for self-production of solar energy.
<b>Use stage</b>	
<b>Exposure to chemicals that are harmful to health</b>	<p>Exposure to textile chemicals that are harmful to health is an area with high relevance <sup>11</sup>. There is also good potential to ensure the avoidance of, amongst other things, CMR substances such as carcinogenic dyes, allergenic dyes, endocrine disrupting dyes such as certain phthalates or to ensure that no harmful flame retardants have been used. These are just a few of the chemicals associated with textile production that are harmful to health.</p> <p>This can either be documented using information back along the production chain on exactly which chemicals have been used in production, or tests can be carried out on the finished textile. Collecting data from back along the production chain also ensures that there is no use of harmful chemicals that impact on the environment due to discharges from wet processes.</p> <p>Testing the finished product does not achieve this in the same way– particularly if the chemical is an auxiliary chemical, which is usually removed from the textile during its manufacture.</p>
<b>Harmful chemicals from recycled fibre or reuse of textiles</b>	Relevance and potential are judged to be medium to high in this area. Testing of recycled fibre is considered the most steerable way of ensuring that specific harmful chemicals are not present. When reusing textiles in new Nordic Swan Ecolabelled products, steerability regarding exposure to harmful chemicals can be achieved by only using products with chemical traceability, when it comes to products with close skin contact.
<b>Quality and lifetime</b>	<p>For the textile industry in general, there is considered to be high potential in confirming the high quality and long life of the textile.</p> <p>There is also steerability regarding the quality, since it is possible to set requirements in the criteria that specific quality parameters must be documented using standardised quality tests.</p> <p>The lifetime is more difficult to control since the real-world lifetime (not just its technical life expectancy) is also affected by consumer behaviour and this is difficult to control through the ecolabelling of the textile. There is therefore no RPS for direct requirements, but the Nordic Swan Ecolabel requires third-party approval of all materials and chemicals – something that can be difficult to fit into the schedule for fast fashion products. The Nordic Swan Ecolabel is thus more suited to slow fashion products with a design that is likely to last longer.</p>
<b>Waste and recycling</b>	
<b>Textiles for recycling (Free from harmful chemicals)</b>	The highest RPS in relation to how ecolabelling of a textile can promote recycling is to ensure that textiles are free from harmful chemicals, making their reuse desirable. Requiring all the chemicals used to be approved has relevance, potential and steerability.

<sup>11</sup> Chemical in textiles – Risk to human health and the environment, Swedish Chemicals Agency 2014

<p><b>Textiles for recycling (Design for disassembly)</b></p>	<p>Here, a high RPS has been found in reducing the use of metal and plastic details on the textile as much as possible – metal rivets, for example, are not permitted for purely decorative purposes.</p> <p>The combination of different fibre types is also of high relevance in terms of a textile's suitability for fibre-to-fibre recycling. However, there is currently no realisable potential for all types of textile products. In the area of professional textiles, for example, there is a need to use cotton/polyester blends to achieve the required performance and save energy in industrial laundering. There is considered to be a medium RPS for ensuring that jeans and other denim goods are suitable for fibre-to-fibre recycling.</p>
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### 3.3 Textiles and a circular economy

Textile consumption is high in the Nordic countries and the time during which the individual textile is actively used is often short. Over half of garments are neither reused or recycled and are instead discarded after use. At the same time, large amounts of clothing and textiles that have barely been used – and so could remain in use for a long time to come – are simply thrown away.<sup>12</sup> The Nordic Council of Ministers is one of the bodies focusing on reversing this trend, as described in the report “Well dressed in a clean environment: Nordic action plan for sustainable fashion and textiles” from 2015. This states that “the environmental and social footprint of the Nordic region’s textile consumption shall be significantly reduced, while at the same time advancing the Nordic industry’s position in sustainable fashion.” This is further explained with a focus on making textiles part of a circular economy rather than ending up as waste. To make Nordic textile consumption more circular, it is important to place an emphasis on increasing the lifetime of products, and on ensuring that the textile fibres are free from specific problematic substances. This way, the textiles or their fibres can be held in a closed, toxin-free resource cycle that allows for their use repeatedly.

The recycled feedstock for textile fibre production often comes from materials other than textiles, such as PET bottles. Wool and cotton can also be recycled by shredding the textile and spinning the fibres again.

The fibre-to-fibre recycling can be either mechanical, often resulting in the downcycling of the fibres to a lower quality product or chemical. The chemical recycling processes for fibre-to-fibre recycling are in development and may potentially bring greater benefits, such as improved quality. The recycling of textile fibres into new textile fibres remains limited globally due to technical barriers and low prices for virgin fibre, combined with high recycling costs and obstacles to trade in recovered textiles. For polyester and regenerated cellulose, however, there are already commercial fibre-to-fibre processes such as ECO CIRCLE™ FIBERS by Teijin, Refibra from Lenzing and Circulose® pulp from Renewcell.

Over time, there is considerable potential for value creation in a circular economy, if the fashion industry is able to convert textile waste into raw material for textile production using advanced recycling techniques. However, this type of

<sup>12</sup> NMR 2014, Towards a Nordic textile strategy.

recycling technology is not yet available for a broad spectrum of fibres, and such a system has not proven economically viable on a large scale<sup>13</sup>.

For specific fibre types, the industry is well advanced in its use of recycled materials for the production of new textiles. This is particularly for polyamide (nylon) and polyester, where the technology (mechanical or chemical), availability and quality make it possible to turn recycled materials into new fibres – not necessarily fibre-to-fibre, but instead using other recycled materials. An analysis conducted as part of a project for the Nordic Council of Ministers shows an environmental effect from the use of recycled materials for the fibre types studied. This generation of the criteria thus includes a requirement concerning the use of recycled materials based on fossil resources to make synthetic fibres<sup>14</sup>.

Ecolabels such as the Nordic Swan can be used as a tool to stimulate a circular economy. They are a particularly good tool for ensuring that textiles are produced using the least harmful chemicals, making it more desirable to recycle the textile or its fibres after its final use.

Ecolabels are unable to control what happens to the textile in the use and waste stage. This can, however, be influenced via specific measures in the textile production or requirements imposed on the textiles that can make resource efficient waste management possible, for example by prohibition of harmful chemicals makes it more desirable to recycle the textile.

The Nordic Swan Ecolabel sets quality requirement for textiles in the form of minimum permitted dimensional changes in the textile and a requirement for colour fastness during washing, use and exposure to light. Ensuring the high quality of the textile makes a long use stage more likely. The greatest potential for reducing the environmental impact of textiles is linked with extending their use stage so that clothing, for example, is worn many times over. This reduces the need to purchase and produce new textiles.

However, several factors come into play in this context. The quality of the textile is one thing, but user behaviour and durable design are also key parameters. There is, however, little scope to influence these through ecolabelling.

### 3.4 Environmental impact from different types of fibre

There is often a focus on identifying the best fibres for textile production in environmental terms, and various reports have analysed how fibres impact on the environment. But in addition to different textile fibres having a different environmental impact, they also have different functionality in the use stage and at end-of-life<sup>15</sup>. This functionality can have a major impact on the textile's quality, area of use and lifetime, and is thus significant for the overall environmental impact throughout the life cycle of the textile.

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<sup>13</sup> PULSE OF THE FASHION INDUSTRY, Global Fashion Agenda & The Boston Consulting Group 2017.

<sup>14</sup> Nordic Council of Ministers (2016). Gaining benefits from discarded textiles: LCA of different treatment Pathways.

<sup>15</sup> Laitala, K. Does Use Matter? Comparison of Environmental Impacts of Clothing Based on Fiber Type, MDPI 2018 <https://www.mdpi.com/2071-1050/10/7/2524>

One example of the variation among different fibre types can be found in cradle-to-grave analyses such as the one presented in the Global Fashion Agenda's Pulse report from 2017<sup>16</sup>. This provides a cradle-to-gate environmental impact index per kg of material using data from the Higg Material Sustainability Index (MSI). In the ranking of the various fibres, several of the synthetic fibres, such as polyester and polypropylene, do well environmentally, whereas the natural fibres such as cotton, wool and silk are down at the bottom end. In this case, however, there is no differentiation between conventional and organic fibre production, or between virgin and recycled fibres. The danger of using such an index lies in the underlying weighting of the different environmental impact categories. This is done in order to be able to add up all the environmental impact categories and give a total quantitative value for each fibre type. This weighting determines how much importance is attached to impacts such as harmful chemicals, water consumption, land use, biodiversity, use of fossil resources, energy consumption and climate impact. The Sustainable Apparel Coalition (SAC), which is responsible for the Higg Index, stresses in its own article "Materials Sustainability in the Higg Index"<sup>17</sup> that the MSI is not an LCA tool, and nor should it replace LCA studies. The MSI's reliance on weighting and its allocation of a simple total score are not in line with standardised LCA methods.

Nordic Ecolabelling has chosen not to rank the individual fibre types against each other. The considerable difference in functionality in the use stage and end-of-life means that this product group contains countless functional units. Instead, the criteria focus on setting requirements that promote the environmentally best variant of the particular fibre type. Fibre types for which it has not been possible to set good requirements that can be documented have not been included, or a limit has been set on the use of the fibre type in the criteria. The criteria for the Nordic Swan Ecolabelling of textiles, hides/skins and leather do, however, set joint requirements for all fibres regarding the relevant processes and properties in the production of the finished textile, plus quality requirements that are relevant for the use stage.

### 3.5 Microplastics and fibre fragment loss

Textiles from synthetic fibres such as polyester are a source of microplastics when fibre fragments are detached from textiles. Microplastic can be harmful to health and the environment.<sup>18,19</sup> The Nordic Swan Ecolabel takes the concerns about microplastics seriously and wishes to limit the release of microplastics from textiles. Here it is important to wash textiles less often. New standardized methods have just been developed to test for fibre fragment loss from textiles. However, there is still a lack of knowledge about which characteristics of textile production are important for the release of microplastics. Therefore, it is difficult to set absolute requirements for the textile production itself.

#### **Lack of knowledge**

A major challenge that many researchers point out, has been a lack of

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<sup>16</sup> [http://globalfashionagenda.com/wp-content/uploads/2017/05/Pulse-of-the-Fashion-Industry\\_2017.pdf](http://globalfashionagenda.com/wp-content/uploads/2017/05/Pulse-of-the-Fashion-Industry_2017.pdf)

<sup>17</sup> Materials Sustainability in the Higg Index, 2013 <http://www.chinawaterrisk.org/interviews/materials-sustainability-in-the-higg-index/>

<sup>18</sup> Gaylarde C, Baptista-Neto JA, da Fonseca EM (2021) Plastic microfibre pollution: how important is clothes' laundering? *Heliyon* 7 e07105

<sup>19</sup> Henry B, Laitala K, Klepp IG (2018) Microplastic pollution from textiles: A literature review. Project report No. 1-2018. Oslo and Akershus University College of Applied Sciences.



standardised methods for examining fibre fragment loss/microplastics from textiles.<sup>20,21</sup> These test methods are now ready and now there is a need for studies that collect and compare test results and thus find out what should be done. Both the fibre type, yarn properties, textile structure, brushing and cutting techniques can have a bearing on how much microplastics/fibre fragment is released from the fabrics. Fibre fragments/microplastics, can also be collected during the production process, for example after washing or by removing loose fibre fragments from dry fabrics.<sup>22,23</sup> Currently, there is a lack of knowledge about methods for this. Some microplastics from production as well as from washing machines are, however, retained in wastewater treatment plants.<sup>24,25,26</sup>

### **Ecolabelling of both natural and synthetic fibres**

Synthetic fibres constitute a large share of the market for textiles and have applications that natural fibres cannot fully cover. Completely excluding synthetic fibres from ecolabelled textiles will make the Nordic Swan Ecolabel not relevant to a large part of the market. The Nordic Swan Ecolabel believes that it will have greater environmental impact to set requirements that can contribute to reducing the environmental burden from both synthetic and natural fibres. Here, the overall requirements for chemicals, resource use, biodiversity and climate impact are important.

When it comes to synthetic fibres, the Nordic Swan Ecolabel requires that recycled or bio-based fibres be used so that less new plastics from fossil sources are produced.

### **Fleece**

Polyester is the most common synthetic fibre, and polyester fleece was early mentioned as a source of microplastics. However, all synthetic textiles shed microplastics. Very little research has been published on whether fleece is worse

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<sup>20</sup> Ramasamy R, Subramanian RB (2021) Synthetic textile and microfiber pollution: a review on mitigation strategies. *Environment Science and Pollution Research* 28(31):41596–41611.

<sup>21</sup> Henry B, Laitala K, Klepp IG (2019) Microfibres from apparel and home textiles: Prospects for including microplastics in environmental sustainability assessment. *Science of the Total Environment* 652:483–94.

<sup>22</sup> Roos S, Arturin OL, Hanning AC (2017) Microplastics shedding from polyester fabrics. *Mistra Future Fashion Report number 2017:1*. Swerea

<sup>23</sup> <http://oceancleanwash.org/solutions/> (11.10.2021)

<sup>24</sup> Habib RZ, Thiemann T, Al Kendi R (2020) Microplastics and wastewater treatment plants – a review. *Journal of Water Resources and Protection* 12:1–35.

<sup>25</sup> Cesa FS, Turra A, Baruque-Ramos J (2017) Synthetic fibers as microplastics in the marine environment: A review from textile perspective with a focus on domestic washings. *Science of the Total Environment* 598:1116–1129.

<sup>26</sup> Xu X, Hou Q, Xue Y, Jian Y, Wang LP (2018) Pollution characteristics and fate of microfibers in the wastewater from textile dyeing wastewater treatment plant. *Water Science and Technology* 78(10):2046–2054.

than other polyester fabrics, and the results are contradictory.<sup>27,28,29,30</sup> Currently, a lot of research is being done on how the production of fleece and other polyester fabrics can be improved. Fleece textiles will now have to be tested for loss of fibre fragments and over time possibly comply with a requirement which exclude fleece with high fibre loss when washing.

### **Cotton, regenerated cellulose and wool**

Textiles made from cellulose fibres, such as cotton and regenerated cellulose fibre, also shed microfibrils, and such microfibrils have also been found in aquatic environments.<sup>31,32,33</sup> However, there is greater concern about plastic fibres because they more easily attract environmental toxins, which are then transported with the fibres.<sup>34, 35</sup> In addition, cellulosic fibres degrade. Wool is a protein fibre that also degrades, but little has been investigated as to whether microfibrils from woollen fabrics are present in the environment. Even natural fibres are today treated with wax or various types of plastics to make the fabrics softer or shrink less when washed. How this affects how the fibres degrade or shed microplastics is little known.<sup>36</sup> Therefore, The Nordic Swan Ecolabel requires that any coating on the wool must be degradable, see requirement O31.

### **Laundry requirements**

The Nordic Swan Ecolabel also sets requirements for textile services (laundries) to reduce microplastics release. Ecolabelled laundries are rewarded if they have installed filters that collect microplastics. Scientists and industry are constantly working to develop better filters.

### **Guidance of the consumer**

Filters for washing machines for consumers have also been developed but have not become standard yet.<sup>37</sup> Washing bags that retain microplastics also exist, but research shows that both filters and washing bags vary in how much they

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<sup>27</sup> Bendt E, Rabe M, Stolte S, Zhang YQ, Klauer R, Kraas C, Alrajoula T, Kolberg A (2021) Textiles mikroplastik reduzieren. Erkenntnisse aus einem interdisziplinären forschungsprojekt. Bundesverband der Deutschen Sportartikel-Industrie e.V.

<sup>28</sup> Cai Y, Yang T, Mitrano DM, Heuberger M, Hufenus R, Nowack B (2021) Systematic study of microplastic fiber release from 12 different polyester textiles during washing. *Environmental Science and Technology*, 54(8): 4847-4855.

<sup>29</sup> Jönsson C, Arturin OL, Hanning AC, Landin R, Holmström E, Roos S (2018) Microplastics Shedding from Textiles – Developing Analytical Method for Measurement of Shed Material Representing Release during Domestic Washing. *Sustainability* 10(7):2457.

<sup>30</sup> Almroth BMC, Åström L, Roslund S, Petersson H, Johansson M, Persson NK (2018) Quantifying shedding of synthetic fibers from textiles; a source of microplastics released into the environment. *Environmental Science and Pollution Research International* 25(2):1191–9.

<sup>31</sup> Suaria G, Achtypi A, Perold V, Lee JR, Pierucci A, Bornman TG, Aliani S, Ryan PG (2020) Microfibers in oceanic surface waters: A global characterization. *Science Advances* 6(23): eaay8493.

<sup>32</sup> Savoca S, Capillo G, Mancuso M, Faggio C, Panarello G, Crupi R, Bonsignore M, D'Urso L, Compagnini G, Neri F, Fazio E, Romeo T, Bottari T, Spanò N (2019) Detection of Artificial Cellulose Microfibers in Boops Boops from the Northern Coasts of Sicily (Central Mediterranean). *Science of the Total Environment* 691:455–65.

<sup>33</sup> Woodall LC, Sanchez-Vidal A, Canals M, Paterson GLJ, Coppock R, Sleight V, Calafat A, Rogers AD, Narayanaswamy BE, Thompson RC (2014) The Deep Sea Is a Major Sink for Microplastic Debris. *Royal Society Open Science* 1(140317).

<sup>34</sup> Gaylarde CC, Baptista-Neto JA, da Fonseca EM (2021). Nanoplastics in aquatic systems - are they more hazardous than microplastics? *Environmental Pollution* 272, 115950.

<sup>35</sup> Wang F, Wang F, Zeng EY (2018) Chapter 7 - Sorption of Toxic Chemicals on Microplastics. In Zeng EY (ed.) *Microplastic Contamination in Aquatic Environments*. Elsevier, 225–247.

<sup>36</sup> Hassan MM, Carr C (2019) A Review of the Sustainable Methods in Imparting Shrink Resistance to Wool Fabrics. *Journal of Advanced Research* 18:39–60.

<sup>37</sup> Brodin M, Norin H, Hanning AC, Persson C, Okcabol S. (2018) Microplastics from Industrial Laundries - A Study of Laundry Effluents. The Swedish Environmental Protection Agency.

retain.<sup>38,39</sup> Good advice is not to wash your clothes more often than necessary, use a front-feed washer and wash at a low temperature.<sup>40,41,42</sup>

## Research

The last years several major research projects on microplastics are carried out, with researchers, organisations and the textile industry collaborating, and new projects are underway.<sup>43</sup> Efforts are being made both to identify the sources of release and how the environment is affected, and to develop better materials and production methods.

The Nordic Swan Ecolabel follows these projects and will continue to gather new knowledge. The Nordic Ecolabel now requires synthetic textiles to be tested for loss of fibre fragments in accordance with either test standards from TMC (The Microfiber Consortium) or future equivalent EN / ISO standards. Nordic Ecolabelling can subsequently insert a limit value in the requirement during the period of validity of the criteria, when a relevant rating system with applicable limit values has been developed.

## 4 Other labelling schemes and steering instruments

The global textile industry uses many different labels with a focus on health, the environment and working conditions. One explanation for the many types of labels may be the complex value chain, which makes it difficult for the manufacturer or Brand Owner to control every step back along the production chain. In this respect, labels that include third-party certification provide greater peace of mind regarding the product and the underlying production and pass credible information further up the value chain. However, with textile production known to be among the most environmentally impactful industries globally, there is strong demand to know that something is being done to reduce that environmental impact.

Some of the labels are type 1 ecolabels, such as the Nordic Swan Ecolabel, the EU Ecolabel and GOTS. These assess the entire life cycle of the product and target requirements at the stages in the life cycle that have relevance and potential.

These labels are based on the ISO 14024 standard and set requirements regarding the relevant environmental parameters for textiles. Other labels are raw material labels, such as the organic label, plus there are labelling schemes

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<sup>38</sup> Napper IE, Barrett AC, Thompson RC (2020) The efficiency of devices intended to reduce microfibre release during clothes washing. *Science of the Total Environment* 738:140412.

<sup>39</sup> McIlwraith HK, Lin J, Erdle LM, Mallos N, Diamond ML, Rochman CM (2019) Capturing Microfibers – Marketed Technologies Reduce Microfiber Emissions from Washing Machines. *Marine Pollution Bulletin* 139:40–45.

<sup>40</sup> [www.oceancleanwash.org/solutions/solutions-for-consumers](http://www.oceancleanwash.org/solutions/solutions-for-consumers) (11.10.2021).

<sup>41</sup> Vassilenko K, Watkins M, Chastain S, Posacka A, Ross P (2019) Me, My Clothes and the Ocean: The Role of Textiles in Microfibre Pollution. Ocean Wise Conservation Association.

<sup>42</sup> Hartline NL, Bruce NJ, Karba SN, Ruff EO, Sonar SU, Holden PA (2016) Microfiber Masses Recovered from Conventional Machine Washing of New or Aged Garments. *Environmental Science & Technology* 50(21):11532–38.

<sup>43</sup> Examples are projects led by the Swedish research institute Swerea <https://www.ri.se/sv/vad-vi-gor/projekt/minshed>, the Norwegian research institute SINTEF [www.sintef.no/en/projects/microfibre-evaluating-the-fate-effects-and-mitigat/](http://www.sintef.no/en/projects/microfibre-evaluating-the-fate-effects-and-mitigat/), the German industry organisation Bundesverband der Deutschen Sportartikel-Industrie e.V. <http://textilemission.bsi-sport.de/>, the organisation OceanWise and American apparel companies <https://ocean.org/action/microfiber-partnership/>, and the organisation The Microfibre Consortium <https://www.microfibreconsortium.com/> (05.09.2022)

for social and ethical conditions, such as the Fair-Trade label. There are also health labels that focus on the chemical content of the finished product, such as the OEKO-TEX standard 100 and the Asthma and Allergy label.

## 4.1 Important substance lists

### **The Detox Catwalk, Greenpeace**

With its Detox Catwalk campaign in 2010, Greenpeace urged the global textile industry to phase out 11 harmful chemical groups by 2020. Greenpeace places an emphasis on four principles that underpin a company's undertaking to phase out chemicals by 2020: responsibility, the precautionary principle, a credible definition of "zero chemicals" and the public's right to know about the toxic chemicals used – including by suppliers.

Nordic Ecolabelling prohibits the use of all the 11 below listed substance groups in the production of the textile and defines "zero chemicals" as follows. When prohibiting ingoing substances, Nordic Ecolabelling's requirements mean all substances, whatever their concentration in a used chemical or chemical blend, including additives and known products released from ingoing substances. Impurities cannot, however, always be completely avoided. The only permitted impurities are residual products from production, including raw material production, that can be found in a used chemical in concentrations below 100 ppm. Such impurities may be reagents such as monomers, catalysts, by-products, or carry-over from previous production lines.

### **The 11 prioritised chemical substance groups are:**

1. Alkylphenols and their ethoxylates (APEOs & APs)
2. Phthalates
3. Brominated and chlorinated flame retardants (BFRs, CFRs)
4. Azo dyes that may release carcinogenic aromatic amines
5. Organotin compounds
6. Per- and polyfluorinated chemicals (PFCs)
7. Chlorobenzenes
8. Chlorinated solvents
9. Chlorophenols
10. Short chain chlorinated paraffins
11. Heavy metals such as cadmium, lead, mercury, and chromium (VI)

### **ZDHC – Zero Discharge of Hazardous Chemicals programme**

The ZDHC Roadmap to Zero Programme is an international partnership between major textile brands and other actors in the textile industry, who are working to phase out harmful chemicals from the industry.

The programme has its own Manufacturing Restricted Substances List, ZDHC Manufacturing Restricted Substances List (ZDHC MRSL) V1.1<sup>44</sup>, published in 2014, which sets out which chemical substances are banned from intentional use in the production of textiles, leather and trim for textiles, clothing and footwear. The limit values for the substances are stated for two groups.

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<sup>44</sup> ZDHC Manufacturing Restricted Substances List (ZDHC MRSL), [https://www.roadmaptozero.com/mrsl\\_online/](https://www.roadmaptozero.com/mrsl_online/) accessed 01.08.2019

Group A, which covers raw materials, finished textile products and supplier guidance, has a total ban on all chemicals on the list.

Group B, which relates to chemical suppliers and the “commercial formulation limit”, has specific limit values for the individual substances, ranging from 2 ppm to 1000 ppm.

Chemical suppliers can choose to register their chemicals that comply with the ZDHC MRSL in the ZDHC Gateway – Chemical module. Third-party certification may be used to confirm compliance with the requirements, but this is optional<sup>45</sup>.

## 5 Justification of the requirements

This chapter presents proposals for new and revised requirements, as well as explaining the background to the requirements, the requirement levels, and any changes since generation 4.

### 5.1 Product group definition

The criteria cover products made from textiles, hides/skins, and leather, or a combination of the above. In this context, textiles, hides/skins, and leather means:

Products for both private and professional use may carry the Nordic Swan Ecolabel.

- Fibres\*, yarn, fabric, and finished textile products.
- Apparel and accessories, for example trousers, shirts, jackets, workwear, uniforms, underwear, handkerchiefs, scarves, purses, wallets, and bags.
- Furnishing fabrics (for both private and professional use), such as towels, bedding, curtains, tablecloths, pillows, duvets, and upholstery textiles, plus textiles for use in the furnishing of cars/trains/aircraft/boats.
- Durable non-woven textiles that are to be used for apparel and accessories or in interior furnishings as described above. Durable non-woven products are those that can be used multiple times and washed.
- Hide and leather products, such as jackets, trousers or bags, and hides/skins and leather as raw materials for clothing or home furnishings (including for cars/trains/aircraft/boats), from the following species of animal: sheep, goat, cow, horse, pig, elk, deer, and reindeer.
- Synthetic leather is included if textile fibre requirements, coating requirements (for textiles) and chemical requirements (for textiles) can be complied with.

*\* Only the following fibre types can be certified with the Nordic Swan Ecolabel as a certified fibre and only if the relevant fibre requirements of the criteria are met: Organic cotton fibres, wool, and other creatine fibres (either sheep, camel, alpaca, or goat), regenerated cellulose produced by closed loop process, flax (linen), silk, bamboo, sisal and other bast fibres.*

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<sup>45</sup> Programme’s Manufacturing Restricted Substances List (MRSL) Conformance Guidance [https://www.roadmaptozero.com/fileadmin/pdf/Files\\_2017/MRSL\\_Conformance\\_Guidance\\_052017.pdf](https://www.roadmaptozero.com/fileadmin/pdf/Files_2017/MRSL_Conformance_Guidance_052017.pdf) accessed 01.08.2019

The following products and materials cannot be ecolabelled in accordance with the criteria for textiles, hides/skins, and leather:

- Mineral fibre, glass fibre, metal fibre, carbon fibre and other inorganic fibres.
- Products or materials that are treated with flame retardants. This also applies to flame retardants that are integrated in the product or material.
- Wall coverings, such as textile wallpapers.
- Disposable products. ‘Disposable products’ refers to products that cannot be washed/cleaned or reused.
- Products containing electronic components.
- Products containing perfume or other fragrances.

Products that can be ecolabelled in accordance with other Nordic Swan Ecolabelling criteria are not covered by the textile criteria.

Examples include:

- Disposable products made from non-woven material that cannot be washed or reused, for example paper towels (criteria for tissue paper).
- Microfibre cleaning cloths (criteria for supplies for microfibre based cleaning).
- Disposable products such as cotton pads for personal care (criteria for sanitary products).
- Wet wipes (criteria for cosmetic products).
- Baby products with textiles such as strollers and nursing pillows (criteria for baby products with textiles).
- Textile floor coverings, such as wall-to-wall carpets and floor mats (criteria for textile floor coverings and carpets).
- Textile products that form part of a piece of furniture, e.g., sofa cushions, mattresses and floor cushions (beanbags) (criteria for furniture and fitments). Pillows that are part of a combined furniture licence, for example with beds or mattresses, and have the same type of filling, can be ecolabelled according to the criteria for furniture and fitments.
- Microfibre cloths (criteria for supplies for microfibre based cleaning).
- Textile banners and roll-ups with print on them (criteria for printing companies, printed matter, envelopes, and other converted paper products).
- Toys/soft toys (criteria for toys).
- Shoes (covered by the EU Ecolabel’s criteria for shoes).

## 5.2 Definitions

Terms	Definition
<b>Product licence</b>	<p>Only with a product licence the product is Nordic Swan Ecolabelled.</p> <p>It is a mandatory licence for companies, that want to place products in its own brand on the market with the Nordic Swan Ecolabel.</p> <p>The ecolabelled product may be e.g., fibres, yarns, fabric or finished goods for the end marked. A product licence will always draw on one or more manufacturing licences.</p>
<b>Manufacturing licence</b>	<p>The licence where most of the environmental requirements are documented.</p> <p>A manufacturing licence does not provide Nordic Swan Ecolabelled products. The licence gives the right to produce for product licences and this within a product range specified in the manufacturing licence (product types and material compositions).</p> <p>A holder of a manufacturing licence can communicate to brand owners, that they can produce for Nordic Swan Ecolabelled products if the brand owner applies for a product licence within the same product range as defined in the manufacturing licence.</p>

	A manufacturing licence does not give the right to communicate that the product is Nordic Swan Ecolabelled or meets the requirements of the Nordic Swan Ecolabel. A brand owner who also produces the textile or wants to be the holder of a manufacturing licence, must always also have a product licence.
<b>Ingoing substances</b>	All substances, in the chemical product, including additives (e.g., preservatives and stabilisers) in the raw materials. Substances known to be released from ingoing substances (e.g., formaldehyde, arylamine and in-situ generated preservatives) are also regarded as ingoing substances.
<b>Impurities</b>	Residuals, pollutants, contaminants etc from production, including production of raw materials, that remain in the raw material/ ingredient and/ or in the chemical product in concentrations less than 100 ppm (0.0100 weight%, 100 mg/kg). Impurities according to this definition are not regarded as ingoing substances and are therefore except from the Oppm restriction. Examples of impurities are residues of the following: reagents including monomers, catalysts, by-products, "scavengers" (i.e., chemicals used to eliminate/minimise undesirable substances), cleaning agents for production equipment, and carry-over from other/earlier production lines.
<b>Laminate</b>	A laminated fabric is a two (or more) layer construction with a polymer film bonded to a fabric. Laminated fabrics are used in rainwear, automotive, and other applications.
<b>Textile</b>	Material made from weaving, knitting, crocheting, thread lacing, or made from felted fibres.
<b>Textile element</b>	"Textile element" is the designation of a unique textile element on the final product. "Textile element" describes the finished textile. Various textile elements have different supply chains or are produced differently, but may be of the same fibre type. Textiles which are only distinguished by dyeing or printing by the same supplier are considered to be the same textile element. For example, polyester from supplier 1 is one textile element, and polyester from supplier 2 will thus be another textile element. Two different types of polyester from the same supplier will also be separate textile elements.
<b>Fibre type</b>	Types of textile fibre such as cotton, wool, polyester, and regenerated cellulose.
<b>Reused textiles, hides/skins, leather</b>	Reused textiles, hides/skins, leather, and filler materials are defined here as post-consumer materials or pre-consumer, where it can be documented that the material is a residual material or waste from another business. Fabrics (not made-up) are only counted as reused textiles, if it can be documented that more than two years have elapsed since the fabric was originally produced
<b>Recycled material</b>	Recycled material is defined in the requirement according to ISO 14021, which applies the following two categories: "Pre-consumer/commercial" is defined as material that is recovered from the waste stream during a manufacturing process. Materials that are reworked or reground, or waste that has been produced in a process, and can be recycled within the same manufacturing process that generated it, are not considered to be pre-consumer recovered material. Nordic Ecolabelling considers reworked, reground or scrap material that cannot be recycled directly in the same process, but requires reprocessing (e.g. in the form of sorting, remelting and granulating) before it can be recycled, to be pre-consumer/commercial material. This is irrespective of whether the processing is done in-house or externally. "Post-consumer/commercial" is defined as material generated by households or commercial, industrial, or institutional facilities in their role as end-users of a product that can no longer be used for its intended purpose. This includes materials from the distribution chain.
<b>Chemical recycling</b>	The definition of chemical recycling used here includes processes in which the final product is either monomers, oligomers, or higher hydrocarbons. Processes with end-product in the form of naphtha or pyrolysis oils are not covered.
<b>Recycled fibres</b>	This covers both mechanical and chemical recycling of fibres and materials.

In this generation 5 of the criteria there are two types of licences:

1. Product licence
2. Manufacturing licence

Each licence type requires a separate application. To get a Nordic Swan Ecolabelled product, you must have both types of licences. See definitions in the table above in section 5.2.

## 5.3 Product licence

A company that, sells Nordic Swan Ecolabelled products under its own brand, or in other ways places a Nordic Swan Ecolabelled product on the market, shall as a minimum to obtain their own product licence meet the requirements O1 to O4 in this section, relevant part of requirement O96 and relevant requirements in section 5.18.

See more about product licence under definitions in section 5.2.

### O1 Traceability of the Nordic Swan Ecolabelled product

The brand owner is responsible for ensuring that a Nordic Swan Ecolabelled product can be traced back to a production licence (see section 5.2 Definitions).

The brand owner must provide the following information about the Nordic Swan Ecolabelled products:

- Whether the products are sold to consumers (B2C) and/or to professionals (B2B).
- Which production licence/licences are being used for each Nordic Swan Ecolabelled products.
- Textiles for B2C segment: Enter the brand owner's trade names as it appears on the products and a description of product type (e.g., bedding, workwear) and fibre composition.
- Textiles for B2B segment: Enter a unique naming of the Nordic Swan Ecolabelled product where at a minimum the product type (e.g., bedding, workwear) and fibre composition is stated. For products with "private label" for a leasing service (e.g., textile services), it must be stated here which "private labels" are included in the product licence.

*The trade name must be identical to the trade names present on the Nordic Swan Ecolabelled products that are sold for retail. A Nordic Swan Ecolabelled product must not have the same trade name as a **non-Nordic Swan Ecolabelled product** from the same brand owner.*

- The product licence owner must submit the information specified in the requirement.
- A description of the procedure of the product licence owner, which shows how it is ensure that the information held by Nordic Ecolabelling is kept updated for the entire period of the licence.

### Background to the requirement

This new requirement has been added to establish a licence structure that ensures contact between Nordic Ecolabelling and the brand owner regarding the Nordic Swan Ecolabelled product. Nordic Ecolabelling will now have the correct information about trade names, which can then be used to inform consumers and professional purchasers about the availability of Nordic Swan Ecolabelled textile products.

Logo print/brand name on the fabric is not necessarily the brand owner of the textile. Here the brand owner sells the Nordic Swan Ecolabelled products under its own brand, or in other ways places a Nordic Swan Ecolabelled product on the market.



## O2 Unsold textiles, skins, and leather

For the Nordic Swan Ecolabelled products unsold textiles, skins and leather and nonconformity productions must not be sent for incineration or dumped in landfill.

The brand owner must inform Nordic Ecolabelling and state on their website how they deal with unsold products.

Exemptions:

- Products, with contaminations which is either harmful to the environment or to health, are exempt from this requirement. The contamination must be documented by a test report, which is archived at the company and thus accessible by inspection from Nordic Ecolabelling.
- Military and police uniforms are also exempt from this requirement.

For the product licence owner, the requirement includes the company's Nordic Swan Ecolabelled products until they are sold to the retail link, which is not owned by the same brand or corporation.

- Description of a procedure on how unsold products are dealt with.
- Link to page on product licence owner's website that has information on how unsold products are dealt with.

### Background to the requirement

The requirement has been set to ensure that unsold textiles, skins and leather and defect products from productions are used in the redesign of new products, sent for recycling, or donated to a charity. The aim of this is to achieve as great an environmental benefit as possible, despite the textiles not being sold for their intended purpose. The requirement also seeks to increase the focus on producing the “right” quantities and so avoiding overproduction.

The requirement has a few exemptions. Textiles, with contaminations which is either harmful to the environment or to health, are exempt from this requirement. The contamination must be documented by a test report, which is archived at the company and thus accessible by inspection from Nordic Ecolabelling. At the same time for security reasons military and police uniforms are also exempt from this requirement.

## O3 Information on reduced washing

For washable garments (except underwear, socks, and stockings) for the consumer market (B2C) the following text must be stated to the consumer: "Reduce number of washes - and help save energy and reduce climate impact".

Equivalent wording shall be approved by Nordic Ecolabelling.

- Submit photo of hang tag or care label on a product as well as routine for how this is done.

### Background to the requirement

The use stage itself has a significant impact on energy consumption and thus climate change when it comes to clothing that is washed. In particular, the washing temperature, the washing frequency and the use of the dryer are of great importance. As a consumer, it is possible to reduce the climate impact by washing only when necessary and washing at lower temperatures<sup>46</sup>. Textiles for

<sup>46</sup> The life cycle of a pair of jeans, understanding the environmental impact of a pair of Levi's 501 jeans, Levi Strauss & Co, <http://levistrauss.com/wp-content/uploads/2015/03/Full-LCA-Results-Deck-FINAL.pdf>

the B2B market, e.g., bed linen and towels for hospitals and hotels, often require to be washed according to strict hygiene standards and are therefore exempt from the requirement.

#### O4 Primary textile packaging

If the brand owner is responsible for the primary textile packaging\* the following requirements shall be documented by the brand owner: O91, O92, O93 and O94.

*\* Primary packaging is defined here as packaging from the manufacturer that accompanies the product all the way to the consumer. Delivery packaging used by online retailers is not considered to be primary packaging.*

- Declaration from the brand owner describing who is responsible for the primary packaging of the product.

#### Background to the requirement

See background to requirement: O91, O92, O93 and O94.

### 5.4 Manufacturing licence

All the following requirements in the criteria are included in the manufacturing licence.

For more about manufacturing licence see under definitions in section 5.2.

#### 5.4.1 Description of product and production methods

This section contains the general requirements for the products and is where the Nordic Swan Ecolabelled products and their production methods are to be described. Requirement limits concerning sewing thread, care labels, elastic and small textile elements are also outlined here.

#### O5 Product description

Describe the products by providing the following information:

- If the product type is fibre, yarn, fabric or finished textile product.
- For finished textile products specify the type (e.g., clothing for babies, children and adults, work wear, underwear, sportswear, swimwear, rainwear, home furnishings, bed linen etc.).
- A unique naming of the product e.g., product name and at a minimum the fibre composition.

- Information requested in the requirement.

#### Background to the requirement

The requirement has been set to ensure that Nordic Ecolabelling has the correct information about the product, which can then be used to inform brand owners, consumers, and professional purchasers about the availability of Nordic Swan Ecolabelled textile products.

#### O6 Material composition

The applicant must provide the information below for each unique product\*.

An overview of all the materials, with indication of weight, present in the product (Bill of Materials), stating:

- All fabrics, specifying their designation/name and fibre composition as a percentage by weight (weight%).
- Membranes/coatings, impregnations, or laminates.
- Details/accessories (e.g., zippers, buttons, Velcro strips, etc.), with information of the material type (e.g., plastic, metal).
- Fillings and stuffing with information of the material type (e.g., foam, feather).
- Information must be provided on whether textile fibres, coating polymer, filling and plastic materials are recycled and/or biobased.
- If the fabric is reused, this must be stated.

*\* The same product in different colours and sizes is still defined here as one unique product.*

- Schematic overview containing the above information for all products covered by the production licence. The overview must clearly state which materials are present in the individual product.

### Background to the requirement

It is important that this information is entered correctly, as it determines which requirements are relevant for the licence in question.

#### O7 Production chain

The following information about the production chain\*\* must be stated, in overview form, for each unique product\*:

- Description of all the production methods/treatment techniques for the whole production of the product, including production by suppliers, as far back as the fibre/ material suppliers, preferably presented in a flow chart.
- Designation/name of the fibres, yarns, and fabrics, which matches the designation/name stated in requirement O6. It must be clear which actors produce and process the various materials.
- Information on all the actors in the production chain, including suppliers and agents, is to be provided: company name, production location, contact person and the production processes used.

*\* The same product in different colours and sizes is still defined here as one unique product. Products with an identical production chain can be grouped together if it is clear which trade names/product name that are gathered into groups.*

*\*\* For re-design, the required description of the production chain starts with the recycled textile as feedstock / raw material.*

- Schematic overview (e.g., flow chart) presenting the above points.

### Background to the requirement

The requirement has been set to ensure that the correct suppliers and processes are associated with the production licence. If any changes occur in the production chain, these changes must be reported to Nordic Ecolabelling.

## 5.5 Material limitations

#### O8 Material limits

The criteria contain the following material limitations and triviality limits:

- Sewing thread is not covered by the requirements.
  - For embroidery thread, only the following chemical requirements apply: O33 Classification of chemical products, O34 Prohibition of CMR substances and O35 Prohibited substances.
  - Embroideries, which together amount to a maximum of 50 cm<sup>2</sup>, are exempt from the requirements.
  - Belt buckles of metals must not exceed 25% by weight of the belt.
  - Fibre types, hides/skins, and leather for which there are requirements in the criteria and which are included with a total amount of no more than 5% by weight of the product are exempt from the fibre requirements in section 5.7 and requirements for hides/skins and leather.
- Description showing compliance with the material limits in the requirement. The material overview from requirement O6 may be used as documentation.

### Background to the requirement

The requirement has been set to adapt the criteria to specific materials such as sewing thread and embroidery thread and to control the types of products that can be Nordic Swan Ecolabelled with regard to the number of materials that are included. The aim of this is to ensure that the product fits in with the criteria and that the requirements are therefore relevant.

Embroidery is often used for logos. An exception to the requirements is granted if the total embroidery area on the product is a maximum of 50 cm<sup>2</sup>, i.e. that if several areas on the product are embroidered, then these areas must be added together and be max. 50 cm<sup>2</sup>. The exception is given to avoid documentation far back in the production chain for small embroideries and thereby make the application process easier.

### O9 Smaller textile elements

Smaller textile elements (e.g., pocket linings) that are individually present to a maximum of 5% by weight and in total to a maximum of 10% by weight in the finished product may be exempted from the requirements concerning fibre and textile production, if one of the following conditions is met:

- the textile element has an EU-Ecolabel certificate or
- the textile element has a GOTS certificate or
- the textile element has an Oeko-Tex 100 class I certificate or can be documented as meeting the requirement level for Oeko-Tex 100 class I in test reports. In addition, fluorinated substances (fluorinated organic compounds) must not be used.

Alternatively, the requirements concerning fibre and textile production are to be fulfilled and documented.

- Certificate relating to the requirements for the textile elements that invoke this exemption.
- For Oeko-Tex 100 certified textiles: an additional statement regarding fluorinated organic compounds.

### Background to the requirement

The requirement makes it possible for small textile elements that have either an EU-Ecolabel, a GOTS certificate or Oeko-Tex 100 class I certification (and have been declared free from fluorinated substances) to be exempt from documenting the requirements for fibre and textile production. Textile products may comprise

many different fabrics with totally different production chains. The requirements for the fabrics used are comprehensive in these criteria, going all the way back to the raw material supplier, and require documentation of all the chemicals used in every stage of the textile production. The choice has therefore been made to permit the use of the other stated certifications for smaller textile elements to make the application process easier.

The previous generation of the criteria included an exemption where fibre types that are not subject to requirements in the document may make up a total of 5% of the product by weight. This has been removed, since the criteria now cover more relevant fibre types, including silk.

#### O10 Elastic bands

Elastic bands up to a total maximum of 25% of the product's weight may be exempted from the requirements for fibre and textile production, if:

- the elastic band has a GOTS certificate for accessories or Oeko-Tex 100 class I certification

Certificate showing that the requirement is fulfilled.

#### Background to the requirement

The requirement allows the use of up to a maximum of 25% by weight of elastic bands. Here, an exception is given for the fibre requirements in section 5.7 on recycled or bio-based elastane fibres. Instead, the elastic band must be either GOTS (certification for "accessories") or Oeko-tex 100 Class I certified. Elastane fibres of recycled or bio-based material are not easily commercially available.

The assessment has been made that e.g., for underwear and sportswear there is a need to be able to use elastane fibres and elastic bands in order to achieve the desired function. These textile products come into close contact with the body, and it is therefore important to ensure that they do not contain any of the most undesirable substances that are harmful to health. A chemical test of the elastic band is therefore required either as a GOTS (certification for "accessories") or Oeko-tex 100 Class I certification.

#### O11 Info print/labels

Information printed directly on the textile product itself must meet the following chemical requirements: O33 Classification of chemical products, O34 Prohibition of CMR substances and O35 Prohibited substances, O37 Metal complex dyes and pigments and O42 VOC in printing paste. There are no requirements relating to fabric info labels sewn or glued into textiles (care label, brand name label and size label).

State which labels are used on the product.

#### Background to the requirement

The requirements for the fabrics used are comprehensive in these criteria, going all the way back to the raw material supplier, and require documentation of all the chemicals used in every stage of the textile production. The decision has therefore been taken to set a triviality limit for info labels, which are such a tiny part of the finished textile product, to make the application process easier. Though information printed directly on the textile product itself must meet the stated requirements.

## O12 Zippers, buttons and other details

Details/accessories\* with no practical function such as sequins, rivets, glitter and so on are not permitted.

Rivets may, however, be used on denim to attach pockets, as they have a reinforcing function in this situation, if the material meets the requirements below.

Metal or plastic details/accessories that have a function may be used (e.g., buttons, press studs, zippers, buckles and reflectors), if the material meets the requirements below.

### **Metal details**

The following limit values apply for metal details:

- Lead (Pb) <90 mg/kg (Digested sample, Detection GC-ICP-MS)
- Cadmium (Cd): <40 mg/kg (Digested sample, Detection GC-ICP-MS)
- Nickel (Ni): Migration limit <0.5 micrograms/cm<sup>2</sup>/week (Test methods EN 12472 and EN 1811 or EN 16128).

### **Plastic- and rubber details:**

Plastic and polymer elements such as tape for seams must not be made from chlorinated plastic such as PVC (polyvinylchloride) or contain phthalates.

\* All parts of the product that are not fabric, sewing thread, stuffing or skin and leather are details.

- Metal: Test report for the metal material in question (e.g., buttons) showing fulfilment of the metal requirement. Alternatively, a GOTS or Oeko-Tex 100 class I certificate may be used as documentation for metal details.
- Plastic: Declaration from the manufacturer of the plastic material (e.g., button manufacturer) that the plastic meets the requirement.
- Declaration from the licensee that no details or accessories are used without a practical function.

## **Background to the requirement**

Details without any function such as sequins and rivets only for decoration are not allowed as they will interfere with future recycling of the fabric. Thus, for example, a sequin dress will not be able to carry the Nordic Swan Ecolabel. The requirement for metals has been set to ensure that people are not exposed to the effects of heavy metals and phthalates that are harmful to health. The lead requirement has been changed to harmonise with the equivalent requirements of Oeko-Tex 100 class I, GOTS and the EU Ecolabel. It is thus now possible to use a certificate from GOTS or Oeko-Tex 100 class I for metal details. The EU Ecolabel cannot be used as documentation for the cadmium requirement since the EU Ecolabel accepts 50 mg/kg. The limit values for cadmium and nickel are the same as in generation 4 of the criteria. The plastic requirement also remains unchanged since generation 4.

By details is meant, for example, buttons, pushbuttons, zippers, sequins, rivets. In case of doubt contact Nordic Ecolabelling.

## **5.6 Re-design of re-used textiles, hides/skins, and leather**

Nordic Ecolabelling wishes to promote the re-use of textiles, hides/skins, and leather. However, to prevent the spread of substances that are harmful to health and the environment, the reused textile, hide/skin, and leather elements used must meet the requirements below. Other newly produced elements of the



product and details such as buttons and zippers must meet the relevant requirements in the criteria.

If the re-used material or the finished product is subject to additional processing with chemical products (e.g. dyes, printing, finishing, etc.), the requirements in sections 5.8.1 and 5.8.2 regarding the relevant chemicals must be fulfilled and documented. Reused textiles, hides/skins or leather that are not further processed using chemicals do not need to meet the requirements concerning chemicals used in textile, hide/skin, and leather production.

The requirements regarding recycled fibres are described in the section on fibre production since this section only addresses textile recycling.

### O13 Re-design of re-used textiles, hides/skins, leather

Re-used textile, hide/skin, and leather materials\* may be used for redesign\*\* of the whole or part of the product if the following are met:

- the material shall not come from workwear and other textiles used in the chemical and oil industry.
- the materials must not contain plastisol print (e.g., PVC, polyvinylchloride), for example in print, coatings, or details.
- before re-design, textiles from the health care sector have been washed at an industrial laundry in a wash, where microorganisms are inactivated. The washing method must either comply with EN 14065: Textiles - Laundry-treated textiles - Control systems for biocontamination or equivalent national certification standard approved by Nordic Ecolabelling\*\*\*.

At the same time, the material must either:

- originally be ecolabelled with the Nordic Swan Ecolabel, the EU-Ecolabel, GOTS or Bra Miljöval, or have Oeko-Tex 100/Leather standard by Oeko-Tex certification, or
- only used for:
  - furnishing fabrics such as rugs, tablecloths, blankets (not bed linen) and curtains
  - outerwear and suit jackets for consumers
  - bags, purses, wallets, and other adult accessories

#### **Re-design for professional use:**

When re-designing products for professional use, there must be a procedure to perform an internal quality assessment of the reused textile to ensure that the produced re-design can fulfil the expected function of the re-designed product.

#### **Further processing of the textile:**

If further processing is carried out with chemical products (e.g., dyeing, printing, finishing, etc.), the requirements in section 5.8 for relevant chemicals must be complied with. As well as requirement O12 for details such as buttons and zippers, if used.

*\* Reused textiles, hides/skins, leather, and filler materials are defined here as post-consumer materials or pre-consumer, where it can be documented that the material is a residual material or waste from another business. Fabrics (not made-up) are only counted as reused textiles, if it can be documented that more than two years have elapsed since the fabric was originally produced. For a further definition, see ISO 14021.*

*\*\* Re-design is defined here as changing the original appearance, function, or content of the product. Direct reuse without re-design is not covered here.*

*\*\*\* Examples on equivalent national industry standards: DK: DS 2451-8 Infection control in the health care sector - Part 8: Requirements for laundering and handling of textiles for multiple use. Norway: Norwegian Laundries' Quality Supervision industry standard «Infection control for laundries that process textiles for health care institutions».*

- ☒ **Originally labelled:** Documentation that the textile, hide/skin, or leather was originally labelled with the ecolabels stated in the requirement or labelled with Oeko-Tex 100. This may be an original invoice or a label on the textile.
- ☒ **No labelling:** Documentation showing that the textile, hide/skin, or leather being used is reused. Also, description of the type of product in which the reused textile, hide/skin or leather will be used.
- ☒ **Textiles from the health care sector:** Declaration on that the textile has been washed in an industrial laundry in a microbiological wash in accordance with the requirement.
- ☒ Declaration that reused material from the mentioned industries has not been used, and that the material does not contain PVC, for example in plastisol print, coatings, or details.
- ☒ Procedure on how in the production of re-design for professional use an assessment is made of the quality of the reused textile, to ensure the quality makes it possible to fulfil the expected function of the re-designed product.

## Background to the requirement

The aim of the requirement is to promote reuse of used textile, hide/skin, and leather products. There is also an environmental gain associated with the use of textile, hide-skin and leather residues/waste which cannot otherwise be used in the production system that generated it. Increased reuse is important in stimulating a circular economy for textiles. This maintains the value of the material at a high level, as it saves on resources, energy, and chemical load by not having to produce new textiles<sup>47</sup>.

There is generally no traceability for reused textiles, hides/skins, and leather with regard to the chemicals used in the original production, and so the recycled material may contain harmful chemicals. The Swedish Chemicals Agency has identified 2,400 substances that are used in textile production.

Of these, 10% are considered to pose a potential health risk for humans by being carcinogenic, allergenic, endocrine disruptors and so on<sup>48</sup>. Even post-consumer textiles that have been washed several times have been found to contain harmful chemicals<sup>49</sup>. The requirement concerning textiles not previously ecolabelled or Oeko-Tex certified therefore contains a limitation on the product types for which reused material may be used. These limitations have been set, based on how the product is normally used and thus how the user is exposed to any harmful chemicals.

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<sup>47</sup> Ellen MacArthur Foundation, A new textiles economy: Redesigning fashion's future, (2017, <http://www.ellenmacarthurfoundation.org/publications>).

<sup>48</sup> Swedish Chemicals Agency (2014). Chemicals in Textiles – risks to human health and the environment. Report from a government assignment. Report 6/14.

<sup>49</sup> Nordic Council of Ministers (2016). Gaining benefits from discarded textiles: LCA of different treatment pathways.



## 5.7 Fibre production

Nordic Ecolabelling sets requirements concerning the production of both natural fibres and synthetic fibres. Natural and synthetic fibres all impact on the environment in one way or another. Synthetic fibres, for example, uses fossil resources, while conventional cultivation of cotton involves high consumption of water and pesticides.

The criteria cover the most common fibre types in the textile industry, with the intention of promoting the variants of each individual fibre type with the best environmental profile. Nordic Ecolabelling also wishes to encourage the textile industry to work towards more sustainable textile production along the whole value chain. The approach here is therefore to focus on the fibre types that are most widely used and thus make a major contribution to the textile industry's environmental impact – in order to nudge them in a less environmentally harmful direction – and to promote new, less environmentally harmful, fibres. This makes it possible to steer even more textile production in a sustainable direction.

The fibres are usually spun. However, if the fabric is non-woven, for example as a substrate (e.g., for laminates, coatings, and membranes), the fibre raw materials must also meet the requirements associated with the relevant fibre in this section.

Fibres must comply with relevant requirements for the type of fibre in the criteria, regardless of whether they apply for Nordic Ecolabelling of fibre, yarn, fabric or finished textile product. The following fibre types can be Nordic Ecolabelled at fibre level: Organic cotton fibres, wool, and other creatine fibres (either sheep, camel, alpaca, or goat), regenerated cellulose, flax (flax), silk, bamboo, sisal and other bast fibres.

### **Natural fibre**

Vegetable fibres are subject to specific requirements concerning the cultivation of cotton and other cellulose seed fibres, as well as flax and other bast fibres.

For animal fibres such as wool and other keratin fibres, requirements are set for the level of residues of pesticides against parasites in wool, as well as COD discharges in wastewater.

### **Regenerated cellulose fibre**

Raw material for regenerated cellulose fibres must either consist of recycled raw material or a high proportion of certified FSC or PEFC wood raw. In addition, requirements banning use of endangered wood species. The production of regenerated cellulose fibres must be a closed loop system or for textiles with less than 30% regenerated cellulose in the fabric, productions that meet strict requirements for emissions are also accepted. In addition, bleaching of cellulose pulp or cellulose fibres with chlorine gas or hypochlorite is prohibited.

### **Synthetic fibre – recycled fossil or biobased**

Synthetic fibres are subject to the requirement that either they must be bio-based or recycled materials are used in production. For bio-based fibres, there are also requirements stipulating the types of raw materials that may be used and that

they must not be cultivated using genetically modified raw materials. Recycled fibres are required to have been tested for content of harmful chemicals. For regenerated cellulose fibre, requirements are set regarding the production processes. Here, the fibre production must involve no discharge to wastewater, and sourcing of a high share of fibres from sustainable forestry or as recycled.

### **Fibre from recycled material**

Fibre from recycled material/fibres\* is exempted from the requirement for virgin fibre but, instead of meeting the requirements for the type of fibre concerned, the applicant must document that the material or fibre is purchased as recycled, and document requirement O30 on testing for content of undesirable substances. There are no requirements concerning chemicals used in the actual recycling processes. However, as with other chemicals added, for example during dyeing or spinning, there are requirements concerning the chemicals used in the treatment of the fibres in requirement O31 and the requirements for chemicals used in all the processes in the textile production, as set out in section 5.8.

\* See definition of recycled material and fibre in section 5.2 Definitions.

### **Fibre not covered by the criteria**

Textile fibres that are not subject to any fibre requirements in these criteria may account for no more than 5% by weight of the individual fabric.

## **5.7.1 Cotton and other natural seed fibres of cellulose**

### **O14 Cotton fibres**

Cotton and other natural seed fibres of cellulose (including kapok) must be organically cultivated\* or recycled\*\*.

The following product types for professional use can be exempted from the requirement of 100% organic cotton:

- Clothing (uniforms and workwear) and
- Bed linen, towels, bathrobes, tablecloths, tea towels, cloths, and napkins for e.g., hotels, hospitals, and other institutions.

If using the exception, the cotton fibres shall not come from GMO (genetically modified organisms)\*\*\* and shall be cultivated according to one of the following standards:

- BCI (Better Cotton Initiative)
- CmiA (Cotton made in Africa)
- Fair-Trade cotton for cotton

The proportions of the different types of certified cotton must add up to 100% and all documentation shall reference the Control Body or certifier of the different standards.

Documentation that BCI cotton does not contain material from GMO shall be documented with either a) or b):

- a) A yearly test of the raw cotton in accordance with test method ISO/IWA 32:2019 or equivalent.
- b) Only for countries where genetically modified cotton varieties are forbidden to grow: documented traceability back to the cultivation and a declaration that no genetically modified cotton varieties have been cultivated.

*Cotton certified via CmiA and FairTrade cotton does not need to be tested, as long as these schemes exclude the use of genetically modified cotton.*

Cotton fibre, cotton yarn and cotton fabrics cannot as an own licence product be Nordic Swan Ecolabelled if using the exception.

\* **Organic cotton** means cotton fibre that is certified as organic or transitioning to organic according to a standard approved in the IFOAM Family of Standards, such as Regulation (EU) 2018/848, USDA National Organic Program (NOP), APEDA's National Programme for Organic Production (NPOP), China Organic Standard GB/T19630. Also approved are GOTS, OCS 100, OCS blended (shares that are not organic must meet other relevant requirements in this criteria) and DEMETER and certification as "transitioning to organic cultivation". The certification body must have the accreditation required for the standard, such as ISO 17065, NOP or IFOAM.

\*\* **Recycled fibres or materials:** Pre-consumer or post-consumer recycled raw materials, see the definition in the ISO 14021 standard. Both mechanically and chemically recycled fibres are included. See the definitions in section 5.2 for more details.

\*\*\* *Genetically modified organisms are defined in EU Directive 2001/18.*

- ☒ **Organic cotton:** Valid certificate showing that the cotton in the Nordic Swan Ecolabelled product was organically cultivated in line with the standards in the requirement. If the supplier is the holder of GOTS certification, the requirement must be documented with a transaction certificate showing that the goods supplied are GOT certified.
- ☒ **Recycled fibres:** Fulfilment of the requirement is documented for recycled fibre with either a) and/or b) below:
  - a) Certificate showing that the raw material is 100% recycled (post and/or pre-consumer) with Global Recycled Standard certificate 4.0 (or later versions), Recycled Claim Standard (RCS) or other equivalent certification approved by Nordic Ecolabelling.
  - b) Present documentation demonstrating that the recycled fibre was purchased as 100% recycled (post and / or pre-consumer) and state the supplier.
- ☒ **Cotton fibres covered by the exception:** Documentation showing that the cotton is grown within one of the three standards BCI, CmiA or Fair-Trade cotton. All documentation shall reference the Control Body or certifier of the different forms of cotton. and be documented
  - on an annual basis for purchased cotton with transaction records and/or invoices, or
  - on a final product basis (by weight) measured at spinning and/or fabrication.
- ☒ Yearly test report showing that the BCI raw cotton does not contain material from genetically modified cotton and procedure demonstrating that how a yearly test is done.
- ☒ Alternative to test for BCI cotton: Declaration that cotton originates from countries with a ban on genetically modified cotton as well as documentation showing that the purchased cotton can be traced back to the BCI farmers.

## Background to the requirement

Cultivation of cotton is linked to serious health and environmental problems caused by the use of pesticides, fertilisers, irrigation water and

monocultures.<sup>50,51,52</sup> Pesticides for cotton cultivation accounted for 5.7% of global pesticide sales and 16.1% of insecticide sales in 2014.<sup>53</sup> The environmental impacts of cotton production vary between countries and production systems. Production ranges from highly mechanised in Australia, Brazil and the US to smallholder farms or a mixture of scales in for example India, China and African countries.

Integrated pest management (IPM)<sup>54</sup> and agro-ecological<sup>55</sup> practises can reduce pesticide use. IPM means that growers must consider all available pest control techniques, for example biological control, crop rotation and resistant varieties, and pesticides must be the last choice. Training of farmers and farm workers and use of protective equipment are also important.

In organic farming, IPM is required along with other practises that promote soil health and biodiversity, and synthetic pesticides and fertilisers as well as genetically modified cotton are prohibited.<sup>56</sup>

IPM is required by law in some countries, for example in all of the EU. Voluntary private certification schemes and national programs promoting IPM also exist. The sustainability standards Fairtrade, CmiA and BCI encourage IPM and prohibit certain hazardous pesticides, including those on the Stockholm Convention and Rotterdam Convention lists and those classified by WHO as 1a and 1b.

In this revision, Nordic Ecolabelling has chosen to require organic cotton for most of the products that carry the Nordic Swan Ecolabel. This is in line with Nordic Ecolabelling's view of organic farming as a means of sustainably protecting soil, water resources and biodiversity. Although organic cotton production is low on a global basis, there is a strong interest in organic products in the Nordic market. This requirement sees us return to the requirement in version 3 of the criteria for Nordic Swan Ecolabelled textiles, and increase the level from version 4, which requires 10% organic cotton with the addition that the remaining 90% should document a low pesticide content.

Although this is a major tightening of the requirement, experience tells us that many of the licences for generation 4 already used 100% organic cotton.

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<sup>50</sup> Pesticide Action Network UK (2018) Is cotton conquering its chemical addiction? A review of pesticide use in global cotton production. [https://issuu.com/pan-uk/docs/cottons\\_chemical\\_addiction\\_-\\_update?e=28041656/62705601](https://issuu.com/pan-uk/docs/cottons_chemical_addiction_-_update?e=28041656/62705601)

<sup>51</sup> European Commission, Joint Research Centre (2013) Revision of the European Ecolabel and Green Public Procurement (GPP) Criteria for Textile Products – Technical report and criteria proposal, Working document, Institute for Prospective Technological Studies (IPTS).

<sup>52</sup> Kooistra K, Termorshuizen A, Pyburn R (2006) The sustainability of cotton – consequences for man and the environment. Wageningen University & Research, report no. 223.

<sup>53</sup> Pesticide Action Network UK (2018) Is cotton conquering its chemical addiction? A review of pesticide use in global cotton production. [https://issuu.com/pan-uk/docs/cottons\\_chemical\\_addiction\\_-\\_update?e=28041656/62705601](https://issuu.com/pan-uk/docs/cottons_chemical_addiction_-_update?e=28041656/62705601)

<sup>54</sup> <https://www.fao.org/pest-and-pesticide-management/ipm/principles-and-practices/en/>

<sup>55</sup> <https://www.fao.org/agroecology/overview/en/>

<sup>56</sup> Nordic Swan Ecolabel: Organic farming (accessed 02.09.2022) <https://www.nordic-ecolabel.org/nordic-swan-ecolabel/environmental-aspects/sustainable-raw-materials-and-biodiversity/organic-farming/>

## **Exemptions from the requirement for 100% organic cotton**

However, the cost of organic cotton can be a barrier in relation to competitiveness, particularly for professional textiles. An exception has therefore been made for these to ensure that these are still relevant for e.g., public procurement. Since professional textiles are not a clearly defined product group, this review narrows it down to clothing (uniforms and workwear) and textiles such as towels, bathrobes, bed linen, duvets, pillows, curtains and rugs for hotels, hospitals, and other institutions. Products not listed may be judged to be professional textiles by Nordic Ecolabelling or through a Nordic assessment.

Textiles where exemptions from the requirement for 100% organic cotton can be used shall meet the standards of FairTrade cotton, CmiA (Cotton made in Africa) or BCI (Better Cotton Initiative). A certificate from one of the standards is required as documentation. Genetically modified cotton is also prohibited. This must be documented for BCI cotton that permits its use. A genetic test of the cotton for every batch purchased is required as documentation. The test must be performed to standard IWA 32:2019, a relatively new test that can identify the presence of genetically modified raw cotton.

## **Recycled cotton fibre**

It is also possible to Nordic Swan Ecolabel textiles that contain recycled cotton fibre. This is cotton fibre that is recovered from used clothing and textiles from consumers or industrial waste (post- or pre-consumer textile waste). Industrial textile waste may be surplus material from the production of yarns, textiles, and textile products, for example selvedge from weaving and fabric remnants from factory cutting rooms. The textiles are stripped and pulled into fibres, which are then carded and spun into new yarn. Recycled cotton may also be blended with virgin fibres to improve yarn strength.<sup>57</sup>

## **GMO**

GMO is a highly debated topic, and several countries have banned cultivation of GMOs. Topics discussed are food security, land use, lack of scientific knowledge about effects under local agricultural/forest conditions and risk of adverse effects on health and the environment.

Nordic Ecolabelling emphasises the precautionary principle and bases its position on regulations that have a holistic approach to GMOs. This means that sustainability, ethics, and benefit to society must be emphasised together with health and the environment. We are not in principle against genetic engineering and GMOs per se but are concerned about the consequences when genetically modified plants, animals and microorganisms are propagated in nature. Nordic Ecolabelling believes that GMOs should be assessed on a case-by-case basis.

Research has not clearly shown that today's GMOs contribute towards sustainable agriculture with less use of pesticides, and there is a lack of research into long-term consequences of GMOs, both environmental, social, and economic consequences.

There are potential adverse effects of GMOs along the entire value chain from crop research and development, through cultivation, storage, use and waste

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<sup>57</sup> Wikipedia - Cotton recycling, [https://en.wikipedia.org/wiki/Cotton\\_recycling](https://en.wikipedia.org/wiki/Cotton_recycling) (accessed 26.08.2019).

management.<sup>58</sup> In several of these stages, there is a lack of scientific studies, and there is a lack of holistic assessment.<sup>59,60,61,62</sup> Today's GMOs are also adapted to industrial agriculture with companies that have obtained a monopoly-like position, and Nordic Ecolabelling wishes to contribute to limiting the negative consequences of this.

Genetically modified cotton is grown primarily in India, the United States, China, and Australia. Most common is Bt cotton, which produces a substance that is toxic to certain insects' pests. Despite years of use there is still uncertainty about the long-term ecological consequences.<sup>63,64</sup> In several countries and regions, insects have become resistant to the toxins produced by the cotton plants, but it varies how long it has taken.<sup>65,66</sup> In India, Bt cotton was first used in 2002. Up to 2006, less insecticide was used overall (amount of active ingredient per hectare) because Bt cotton fought the most common insect pest.<sup>67</sup> However, due to spraying against other insect pests, the use of insecticides increased overall again until 2013, and after 2015 resistant insects have also become a problem.<sup>68</sup> In Australia, integrated pest management was used from the 1990s, which probably contributed to delaying resistance. The use of insecticides in Australia has decreased, first in Bt cotton and then in non-organic cotton, but the use of herbicides has not been reduced.<sup>69</sup>

## 5.7.2 Silk, flax (linen) and other bast fibres (hemp, jute, and ramie)

### O15 Silk

Silk fibre that makes up more than 30% by weight of the fabric must either be certified as "organic"\* or be recycled\*\*.

\* **Organic silk:** *silk that is certified as organic or transitioning to organic according to a standard approved in the IFOAM Family of Standards, such as Regulation (EU) 2018/848, USDA National Organic Program (NOP), APEDA's National Programme for Organic Production (NPOP), China Organic Standard*

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<sup>58</sup> Catacora-Vargas G (2011): "Genetically Modified Organisms – A Summary of Potential Adverse Effects Relevant to Sustainable Development. Biosafety Report 2011/02, GenØk – Centre for Biosafety.

<sup>59</sup> Catacora-Vargas G (2011): Genetically Modified Organisms – A Summary of Potential Adverse Effects Relevant to Sustainable Development. Biosafety Report 2011/02, GenØk – Centre for Biosafety.

<sup>60</sup> Kolseth et al (2015) Influence of genetically modified organisms on agro-ecosystem processes. Agriculture, Ecosystems and Environment. 214 (2015) 96–106.

<sup>61</sup> Fischer et al. (2015) Fischer et al. (2015): Social impacts of GM crops in agriculture: a systematic literature review. Sustainability 7:7.

<sup>62</sup> Catacora-Vargas G et al. (2018): Socio-economic research on genetically modified crops: a study of the literature. Agriculture and Human Values 35:2

<sup>63</sup> Venter HJ, Bøhn T (2016) Interactions between Bt crops and aquatic ecosystems: A review. Environ Toxicol Chem 35(12):2891–2902.

<sup>64</sup> Kolseth et al (2015) Influence of genetically modified organisms on agro-ecosystem processes. Agriculture, Ecosystems and Environment. 214 (2015) 96–106.

<sup>65</sup> Blanco CA et al. (2016) Current situation of pests targeted by Bt crops in Latin America. Curr Opin Insect Sci 15:131–8.

<sup>66</sup> Tabashnik BE, Brévault T, Carrière Y (2013) Insect resistance to Bt crops: lessons learned from the first billion acres. Nature Biotechnology 31:6.

<sup>67</sup> Pesticide Action Network UK UK (2017) Is cotton conquering its chemical addiction. A review of pesticide use in global cotton production. [http://issuu.com/pan-uk/docs/cottons\\_chemical\\_addiction\\_-\\_final\\_?e=28041656/54138689](http://issuu.com/pan-uk/docs/cottons_chemical_addiction_-_final_?e=28041656/54138689)

<sup>68</sup> Pesticide Action Network UK UK (2017) Is cotton conquering its chemical addiction. A review of pesticide use in global cotton production. [http://issuu.com/pan-uk/docs/cottons\\_chemical\\_addiction\\_-\\_final\\_?e=28041656/54138689](http://issuu.com/pan-uk/docs/cottons_chemical_addiction_-_final_?e=28041656/54138689)

<sup>69</sup> Pesticide Action Network UK UK (2017) Is cotton conquering its chemical addiction. A review of pesticide use in global cotton production. [http://issuu.com/pan-uk/docs/cottons\\_chemical\\_addiction\\_-\\_final\\_?e=28041656/54138689](http://issuu.com/pan-uk/docs/cottons_chemical_addiction_-_final_?e=28041656/54138689)

*GB/T19630. Also approved are GOTS and DEMETER and certification as “transitioning to organic cultivation”. The certification body must have the accreditation required for the standard, such as ISO 17065, NOP or IFOAM.*

**\*\* Recycled fibres:** See the definitions in section 5.2.

- ☒ Valid certificate showing that the silk in the Nordic Swan Ecolabelled product was organically cultivated in line with the standards in the requirement. If the supplier is the holder of GOTS certification, the requirement must be documented with a transaction certificate showing that the goods supplied are GOT certified.
- ☒ Fulfilment of the requirement is documented for recycled fibre with either a) or b) below:
  - a) Global Recycled Standard certificate 4.0 (or later versions), Recycled Claim Standard (RCS) or other equivalent certification approved by Nordic Ecolabelling.
  - b) Present documentation demonstrating that the recycled fibre was purchased as recycled and state the supplier.

### **Background to the requirement**

This requirement is new since the previous generation of the criteria did not include silk. The use of silk in Nordic Swan Ecolabelled textiles has been assessed to be relevant. Silk is often used in the textile products of brands that mainly use timeless basic designs in their collections – also known as slow fashion<sup>70</sup>. Natural fibres such as silk and wool are generally considered to be an obvious choice for textiles that last. These fibres provide good breathability and are slow to take on odours<sup>71</sup>. There is no specific standard for organic silk, but as with other organic natural fibres, silk fibre can be certified as organic according to an approved standard within the Organic IFOAM Family that is relevant to the production type in question<sup>72</sup>. Organic cultivation means no use of artificial fertilisers or pesticides when growing mulberry trees or other plants for silkworms.

### **O16 Flax (linen) and other bast fibres**

Flax (linen) and other bast fibres (e.g., hemp, jute, and ramie) may only be cultivated using pesticides permitted according to Regulation (EC) No 1107/2009.

- ☒ Valid certificate from European Flax Standard or equivalent.

### **Background to the requirement**

The use of natural fibres in textiles has the advantage that it does not draw directly on fossil resources. It remains relevant, however, to consider whether these natural fibres are sustainably cultivated with minimum damage to the environment. It is, for example, important to ensure that there has been no use of harmful pesticides that could lead to a loss of biodiversity.

Pesticides may only be used for the cultivation of flax (linen) and other bast fibres if those pesticides are permitted according to Regulation (EC) No 1107/2009. The requirement is documented with the European Flax Standard certificate or equivalent. European Flax Standard is a certification scheme for flax grown in Europe. The flax is thus grown in accordance with EU 1107/2009. It is not

<sup>70</sup> Slow fashion [https://en.wikipedia.org/wiki/Slow\\_fashion](https://en.wikipedia.org/wiki/Slow_fashion)

<sup>71</sup> Design for Longevity Guidance on increasing the active life of clothing, 2013, [http://www.wrap.org.uk/sites/files/wrap/Design%20for%20Longevity%20Report\\_0.pdf](http://www.wrap.org.uk/sites/files/wrap/Design%20for%20Longevity%20Report_0.pdf)

<sup>72</sup> Organic IFOAM Family of Standards <https://www.ifoam.bio/en/ifoam-family-standards-0>



uncommon for flax from Europe to be sold to countries in Asia for use in textiles and several Asian productions have a certificate for the European Flax Standard.

#### O17 Water retting of flax (linen) and other bast fibres

Production of flax (linen) and other bast fibres (e.g., hemp, jute, and ramie) using water retting is only allowed if the wastewater from the retting ponds is treated to reduce the chemical oxygen demand (COD) or the total organic carbon (TOC) by at least:

- 75% for hemp fibres
- 95% for flax (linen) and other bast fibres

*Test method: Test in accordance with ISO 6060.*

*Measurement of BOD (Bio-chemical oxygen demand), PCOD (particulate chemical oxygen demand) or TOC (total oxygen demand) may also be used if a correlation to COD is evident.*

- ☒ Test report from the producer of the flax (linen)/bast fibre, showing that the requirement is fulfilled or
- ☒ Proof of a valid EU Ecolabel licence in line with the Commission Decision of July 2014.

### Background to the requirement

Water retting is prohibited unless the wastewater is cleaned to reduce the content of organic material and so comply with the requirement levels. Either biological or chemical retting is necessary to separate the fibres from the inner stem and the outer shell. This is done by exposing the stem or other bast fibre to moisture and heat. Water retting is the most effective method, but there are other methods such as placing the fibres in a tank and adding enzymes. Emissions of retting wastewater with a high content of organic material to the aquatic environment can result in a lack of oxygen during degradation, which can damage the aquatic animal and plant life. Water retting is used not only for bast fibres but also for sisal fibres<sup>73</sup>. The requirement is unchanged since the current level remains relevant. The EU Ecolabel for textile products has an equivalent requirement concerning COD emissions from water retting. It also includes a requirement that flax and other bast fibres shall be retted under ambient conditions and without thermal energy inputs. Nordic Ecolabelling has chosen not to set this requirement, but instead to focus on pesticide use during fibre cultivation. Requirements for water retting are not covered by the European Flax Standard.

### 5.7.3 Wool and other keratin fibres

#### O18 Wool and other keratin fibres

Any wool and other keratin fibres used must originate from sheep, camels, alpaca, or goats, and must be one of the following:

1. certified organic wool\*
2. recycled wool\*\*, or
3. conventional wool with documentation that the requirement below concerning pesticide content in the raw wool is fulfilled.

Pesticide content in conventional wool:

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<sup>73</sup> Buch, Lignocellulosic Composite Materials, Springer International Publishing 2018.



- The total content of the following substances may not exceed 0.5 ppm: γ-hexachlorocyclohexane (lindane), α-hexachlorocyclohexane, β-hexachlorocyclohexane, δ-hexachlorocyclohexane, aldrin, dieldrin, endrin, p,p'-DDT and p,p'-DDD, cypermethrin, deltamethrin, fenvalerate, cyhalothrin and flumethrin.
- The total content of the following substances may not exceed 2 ppm: diazinon, propetamphos, chlorfenvinphos, dichlorfenthion, chlorpyrifos, fenchlorphos, dicyclanil, diflubenzuron and triflumuron.
- The requirement to test for pesticide residues does not apply if documentation can show which farmers produced at least 75% by weight of the wool or keratin fibres, and those farmers can confirm that the substances named in the requirement have not been used in the areas or on the animals in question.

**Test method:** The tests must be performed in accordance with IWTO Draft Test Method 59: Method for the Determination of Chemical Residues on Greasy Wool or equivalent.

The analysis must be performed on raw wool before wet processing and the test report must be submitted with the application. Thereafter, the applicant must have a procedure in place for annual testing in line with the requirement and for ensuring compliance with the requirement. Nordic Ecolabelling must be informed if the requirement is not fulfilled.

*\* **Definition of organic wool:** wool fibre that is certified as organic or transitioning to organic according to a standard approved in the IFOAM Family of Standards, such as Regulation (EU) 2018/848, USDA National Organic Program (NOP), APEDA's National Programme for Organic Production (NPOP), China Organic Standard GB/T19630. Also approved are GOTS and DEMETER and certification as "transitioning to organic cultivation". The certification body must have the accreditation required for the standard, such as ISO 17065, NOP or IFOAM.*

*\*\* **Definition of recycled wool:** Pre-consumer or post-consumer recycled raw materials, see the definition in the ISO 14021 standard. Both mechanically and chemically recycled fibres are included. See the definitions in section 5.2 for more details.*

☒ **Organic wool:** Valid certificate showing that the wool in the Nordic Swan Ecolabelled product was organically cultivated in line with the standards in the requirement. If the supplier is the holder of GOTS certification, the requirement must be documented with a transaction certificate showing that the goods supplied are GOT certified.

☒ **Recycled fibre:** Fulfilment of the requirement is documented for **recycled fibre** with either a) or b) below:

- a) Global Recycled Standard certificate 4.0 (or later versions) or Recycled Claim Standard (RCS) certificate showing that the raw material is recycled, or other equivalent certification approved by Nordic Ecolabelling.
- b) Present documentation demonstrating that the recycled fibre was purchased as recycled and state the supplier.

☒ **Conventional wool:** Declaration from the wool supplier that no mulesing has been used.

☒ **Conventional wool:** Test report showing that the pesticide requirement has been fulfilled, plus a written procedure showing how an annual test is performed in line with the pesticide requirement, along with annual in-house checks of compliance with the requirement. Test results are to be archived and kept available for inspection by Nordic Ecolabelling. An alternative to the pesticide test is a confirmation from the farmers that the stated substances are not used, plus an overview of the proportion of wool concerned.

## Background to the requirement

The requirement only accepts wool fibre from sheep and other keratin fibres from camels, alpaca, and goats. Angora wool from rabbits is not accepted, for example.

Wastewater from washing wool (scouring) often contains large quantities of pesticides that are used to treat sheep. Pesticide residues can have a significant environmental impact if discharged into the aquatic environment. At the same time, pesticides such as organochlorine compounds, which are known to be toxic, non-readily degradable and bio accumulative, may also harm the environment while active in the wool. Despite a ban, this type of pesticide is still used<sup>74</sup>. Wool scouring firms and exporters of wool have the greatest scope to control the use of pesticides for ectoparasites by issuing absolute requirements to the wool producers (farmers). This requirement can therefore be documented by at least 75% of the wool farmers declaring that they do not use the above-mentioned pesticides. Organic wool automatically meets the requirement. According to the International Wool Textile Organization (IWTO), in 2015 less than 1% of global sheep farming was organic<sup>75</sup>. Since wool at the same time accounted for only 1% of the total fibre production (figures from 2017), the total amount of organic wool is not that extensive. The judgement has therefore been made that only accepting organic wool would be too tough a requirement.

Test method IWTO DTM-59: 2009; Method for the Determination of Chemical Residues on Greasy Wool<sup>76</sup>. This method tests for the presence of four groups of pesticide residues: organochlorine compounds, organophosphates, synthetic pyrethroids and insect growth regulators.

### O19 Scouring agents

Scouring agents that are used in the washing of raw wool must be either readily aerobically biodegradable or inherently aerobically biodegradable in accordance with test method: OECD 301 A-F (60% degradability), OECD 310 (60% degradability), OECD 302 A-C (70% degradability) or equivalent test methods.

- Declaration from the chemical supplier and safety data sheet for the scouring agents used and/or OECD or ISO test results showing compliance with the requirement.

## Background to the requirement

The requirement is set to minimize the environmental impact of washing of wool. Here wool detergents are used, which are discharged with the wastewater and thus can affect the aquatic environment. Therefore, these are required to be biodegradable. Raw wool is washed (scoured) to remove dirt, grease, and suint. This is typically performed using water, detergent, and an alkali, but a solvent may also be added to remove oils that are not water soluble.

### O20 COD emissions from wool scouring plants

Emissions of COD (chemical oxygen demand) from wool scouring plants must not exceed (expressed as a 6-month average):

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<sup>74</sup> Ravidnran, J. et al., Organochlorine pesticides, their toxic effects on living organisms and their fate in the environment, *Interdiscip Toxicol*. 2016 Dec; 9(3-4): 90-100.

<sup>75</sup> International Wool Textile Organization (IWTO), "Wool Production." Accessed 07.09.2017: <http://www.iwto.org/wool-production>

<sup>76</sup> [https://www.iwto.org/sites/default/files/images/iwto\\_news/image/INDEX-Red%20Book%202015.pdf](https://www.iwto.org/sites/default/files/images/iwto_news/image/INDEX-Red%20Book%202015.pdf) accessed 13.05.2019.

- 45 g/kg for fine wool (merino wool or wool fibre that is 25 microns or thinner)
- 25 g/kg for coarse wool

Wastewater that is sent to municipal or other regional treatment works is exempted.

*Measurement of PCOD (particulate chemical oxygen demand), TOC (total oxygen demand) or BOD (bio-chemical oxygen demand may also be used, if a correlation to COD is evident).*

*Test method: Test according to ISO 6060.*

- Test report from the wool scouring plant showing that the requirement is fulfilled. Alternatively, a valid GOTS or EU Ecolabel certificate may be used as documentation.

### Background to the requirement

The COD (chemical oxygen demand) requirement remains unchanged from the previous generation of the criteria. The requirement has now been harmonised with requirements set by both the EU Ecolabel and GOTS. The requirement is now split into differentiated requirement levels for fine and coarse wool. The requirement was formerly 20 g/kg for all wool, whether fine or coarse, which did not work optimally. The decision has therefore been made to set the same requirement levels as both the EU Ecolabel and GOTS. This will make it possible to use these wool certifications as documentation for the COD requirement. The EU Ecolabel does not have a pH or temperature requirement, and therefore cannot be used as documentation for that part of the requirement.

Dirt, grease, and suint that are washed out before the wool can be further processed can pollute wastewater discharged into the environment. COD indicates the amount of oxygen consumed through complete oxidation of the organic material under aerobic conditions. The higher the COD emissions, the more oxygen consumption the discharge will cause and the greater the risk of oxygen deficiency in the aquatic environment. This potential environmental impact can be significantly reduced by removing dirt, grease, and suint from the wool, with the resource-efficient bonus of maximising their value as by-products. Removing dirt and grease from the wool also helps to minimise energy consumption and the need for detergents in the wool scouring plant<sup>77</sup>.

### O21 pH value and temperature of wastewater from wool scouring

The pH value of the wastewater released to the surface water must be 6-9 (unless the pH value in the recipient lies outside this interval), and the temperature must be lower than 40°C (unless the temperature in the recipient is higher).

- Test reports from the wool scouring plant showing measurements of the wastewater's pH and temperature. Alternatively, a valid GOTS certificate may be used as documentation.

### Background to the requirement

The requirement has been set so that the discharge of wastewater into surface water does not interfere with the aquatic environment by changing the pH or temperature to a large extent locally, thereby disturbing the natural balance of

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<sup>77</sup> Revision of the EU Green Public Procurement (GPP) Criteria for Textile Products and Services, Technical report with final criteria, JRC 2017.

the aquatic environment. If national legislation sets requirements in this area, this must also be complied with. However, the requirement in these criteria must still be documented. The requirement remains unchanged from the previous generation of the criteria.

## O22 Ban on mulesing

Surgical mulesing and mulesing performed using liquid nitrogen are not permitted on merino sheep.

- Declaration from the merino wool producer, stating that no mulesing has taken place.

### Background to the requirement

Mulesing remains a problem associated with merino wool. Merino sheep are specially bred to have wrinkled skin, so that they produce more wool. This causes urine and faeces to collect around the hind quarters, which attracts flies, who then lay eggs in the folds of skin. Surgical mulesing involves removing wool and skin on the rear end of the sheep to avoid parasites from egg-laying flies. This method is primarily used in Australia. The requirement prohibits this type of treatment and must be documented with a declaration from the wool producer stating that mulesing is not performed.

In 2018, the New Zealand government imposed a ban on surgical mulesing. In Australia, the majority of the country's wool producers still use surgical mulesing<sup>78</sup>. There is, however, a move to find alternatives and Australia's newest non-surgical alternative to the surgical method will be available to sheep farmers in 2019. The process involves the use of liquid nitrogen on the rear of the sheep<sup>79</sup>. Existing alternatives to surgical mulesing include breeding programmes, which involve selective breeding of sheep with low sensitivity to fly strike. Other measures focus on the actual farming practices, such as adjusting the time of shearing the sheep and the time of lambing, as this also helps to minimise the problem of blowfly strike. Work is also under way on various forms of blowfly control. The combination of these measures is considered to be sufficiently effective, compared to surgical mulesing<sup>80</sup>.

### 5.7.4 Regenerated cellulose fibre

Raw materials for regenerated cellulose fibres must meet either requirements O23 or O24 for recycled textile fibre and wooden fibre materials, respectively. A fibre which is based on raw materials from a combination of requirements O23 and O24 can also be approved if the different raw materials each meet their own requirements.

## O23 Regenerated cellulose fibre, recycled textile fibre

Recycled raw materials for the production of new regenerated cellulose fibres must be pre-consumer or post-consumer\* cellulosic material.

It must be documented that 100% is recycled material.

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<sup>78</sup> New Zealand Bans Mulesing, article Sept. 2018 at <https://www.peta.org.au/news/new-zealand-bans-mulesing/>

<sup>79</sup> Non-surgical mulesing alternative for Australasia, article Sept. 2018 at <https://www.ecotextile.com/2018091123719/materials-production-news/non-surgical-mulesing-alternative-for-australasia.html>

<sup>80</sup> Mulesing & Welfare at <http://blogs.ubc.ca/mulesing/take-home-message/>

The traceability of the recycled raw material must be documented with a certificate from either the Global Recycled Standard (version 4 or later) or the Recycled Claim Standard (version 2 or later).

*\* Recycled material is defined here as pre-consumer and post-consumer, see definition in ISO 14021. See definition in section 5.2.*

- ☒ Certificate from either Global Recycled Standard (version 4 or later) or Recycled Claim Standard (version 2 or later) documenting, that the raw material has been recycled.
- ☒ Documentation showing that 100% of the raw material has been recycled.
- ☒ When using a mixture of virgin and recycled raw material: Documentation which shows that 100% of the raw material meets either requirement O23 or O24.

### **Background to the requirement**

With this requirement Nordic Ecolabelling wants to promote the use of recycled cellulose based textiles, as a raw material for the production of new regenerated cellulose fibres. It is positive for the environment and contributes to the circular economy. E.g., the company Renewcell<sup>81</sup> produces Circulose® which is a cellulose pulp made from old textiles. This can be used for the production of new fibres with viscose or lyocell processes. Other companies<sup>82,83,84</sup> also say they will or already produce new fibres from cellulosic waste from textiles and other waste.

Recycled material is defined as pre-consumer and post-consumer waste according to ISO 14021. As documentation for the material to be traced as recycled, certificates from Global Recycled Standard (version 4 or later) or Recycled Claim Standard (version 2 or later) must be used. The minimum requirement for recycled fibre is only 5% for Recycled Claim Standard and 20% in Global Recycled Standard. Hence the proportion of recycled material must also be documented to be 100%.

The requirement can be combined with the following requirements if the material of the regenerated cellulose fibre is a combination of recycled cellulosic textile waste and cellulose fibres, that comes from wood fibres that meet the requirement O24.

#### **O24 Regenerated cellulose fibre, limitation of tree species**

The requirement only applies to virgin wood fibres and must be documented either by the manufacturer of regenerated fibres or the manufacturer of the dissolving pulp and the manufacturer of regenerated fibres.

Nordic Ecolabelling's list of tree species\* consist of virgin tree species listed on:

- a) CITES (Appendices I, II and III)
- b) IUCN red list, categorized as CR, EN and VU
- c) Rainforest Foundation Norway's tree list
- d) Siberian larch (originated in forests outside the EU)

Tree species listed on a) CITES (Appendices I, II and III) are not permitted to be used.

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<sup>81</sup> <https://www.renewcell.com/en/>

<sup>82</sup> <https://infinitedfiber.com/>

<sup>83</sup> <https://www.tencel.com/refibra>

<sup>84</sup> <https://spinnova.com/product/>

Tree species listed on either b), c) or d) may be used if it meets all the following requirements:

- the tree species does not originate from an area/region where it is IUCN red listed, categorized as CR, EN or VU.
- the tree species does not originate from Intact Forest Landscape (IFL), defined in 2002 <http://www.intactforests.org/world.webmap.html>.
- the tree species shall originate from FSC or PEFC certified forest/plantation and shall be covered by a valid FSC/PEFC chain of custody certificates documented/controlled as FSC or PEFC 100% through the FSC transfer method or PEFC physical separation method.
- Tree species grown in plantation shall in addition originate from FSC or PEFC certified forest/plantation, established before 1994.

#### **Exemptions:**

- Eucalyptus and Acacia are exempted from the list. Eucalyptus / acacia must be at least 50% certified and come from forests/plantations managed in accordance with sustainable forestry management principles that meet the requirements of FSC or PEFC. The remaining share must be from controlled sources (FSC controlled wood or PEFC controlled sources).

\* *The list of tree species is located on the website: <http://www.nordic-ecolabel.org/certification/paper-pulp-printing/pulp--paper-producers/forestry-requirements-2020/>*

- Declaration from the applicant/manufacturer/supplier that tree species listed on a-d) are not used, or  
If species from the lists b), c) or d) is used:
- The applicant/manufacturer/supplier are required to present a valid FSC/PEFC Chain of Custody certificate that covers the specific tree species and demonstrate that the tree is controlled as FSC or PEFC 100% through the FSC transfer method or PEFC physical separation method.
- The applicant/manufacturer/supplier are required to document full traceability back to the forest/certified forest unit thereby demonstrating that:
  - the tree does not originate from an area/region where it is IUCN red listed, categorized as CR, EN or VU;
  - the tree species does not originate from Intact Forest Landscape (IFL), defined in 2002 <http://www.intactforests.org/world.webmap.html>;
  - For plantations, the applicant/manufacturer/supplier are required to document that the tree species does not originate from FSC or PEFC certified plantations established after 1994.
- For pulp of eucalyptus / acacia: valid traceability certificate from the pulp producer and documentation showing that the certification requirement of a minimum of 50% is fulfilled and that the remaining share comes from controlled sources.

#### **O25 Regenerated cellulose fibre, traceability, and certified raw materials**

The manufacturer of regenerated fibre or the manufacturer of the dissolving pulp must state the name (species name) of the raw material used in its production.

The manufacturer of regenerated fibre or the manufacturer of the dissolving pulp must have Chain of Custody certification under the FSC or PEFC schemes. Manufacturers who only use recycled material are exempt from the requirement for Chain of Custody certification.

Certification of the fibre raw materials in regenerated fibres, on an annual basis:

1. At least 50% of the raw materials must originate from forest managed according to sustainable forestry management principles that meet the requirements set out by FSC or PEFC chain of custody schemes, or
2. At least 70% of the fibre raw material must be recycled material\*, or
3. A combination of certified and recycled fibres.

The remaining percentage of wood raw materials must be covered by the FSC/PEFC compliance schemes (FSC Controlled Wood/PEFC Controlled Sources).

The requirement must be documented as purchased raw material/fibre on an annual basis (volume or weight) by the producer of regenerated fibre or the manufacturer of the dissolving pulp.

Producers of dissolving pulp must be specified. If several pulps are mixed, the certification percentage must be met for the finished pulp that is used.

\* *Recycled material is defined according to ISO 14021. See section 1 for additional definitions.*

- The manufacturer of regenerated fibres or the manufacturer of the dissolving pulp shall describe name (species name) on the fibre raw material used.
- Valid Chain of custody- certificate from manufacturer of pulp or regenerated cellulose or link to certificate holders' valid certificate information in FSC/PEFC databases covering all wood and bamboo fibre raw materials used (e.g., via link to the website).
- Producers that only use recycled fibres from cardboard and paper shall show that the recycled fibres are covered by EN 643 delivery notes. In the case of recycled fibres from other sources, the supplier must be stated, and it must be shown that the fibres are recycled according to the definition.
- If the requirement for certification percentage is documented by the manufacturer of dissolving pulp (s) must be specified. The pulp producer must document that the pulp contains a minimum of 50% certified raw material on an annual basis by enclosing accounts which show the proportion of certified wood raw material in production, and that the rest of the raw material is from controlled sources.
- If the requirement for certification percentage is documented by the manufacturer of regenerated cellulose, the supplier (s) of the dissolving pulp must enclose documentation for the proportion of certified fibre in the various pulps purchased and that the average certification percentage is met on an annual basis. Documentation must be attached, e.g., invoice or delivery note, for delivery between pulp producer and producer of regenerated cellulose which shows that purchased pulp contains a minimum of 50% certified wood raw material or bamboo.
- Alternatively, the claim can be documented by the next link (purchaser of the regenerated cellulose fibres) purchasing FSC/PEFC marked regenerated cellulose fibre or with a claim with 50% certification. Nordic Ecolabelling may request further documents to examine whether the requirements are fulfilled.

### **Background to the requirement**

The requirement concerns the use of raw materials, which must be legally harvested and not come from protected areas of land. The raw material for regenerated cellulose fibre is usually wood fibre or bamboo. Recycled cotton or viscose fibre may also be used. This revision retains the requirements for the use of certified wood and the certification share has been increased from 30 to 50%. In addition, bamboo is required to be grown in forest areas that are certified according to one of the FSC or PEFC standards. More information about Nordic



Ecolabelling's forestry requirements can be found on the Nordic website<sup>85</sup>. Nordic Ecolabelling also wants to stimulate the use of recycled fibre and sees that in Sweden renew cell is produced as a cellulose pulp of old cotton and viscose fibres, which can be used in new fibre production.

## O26 Bleaching with chlorine gas

Chlorine gas must not be used when bleaching cellulose mass or cellulose fibres.

\* *Residual amounts of chlorine gas formed during the production of chlorine dioxide from chlorate are excluded.*

- A declaration from the cellulose mass and regenerated cellulose manufacturers that the requirement is fulfilled or a valid EU Ecolabel licence in accordance with the Commission's decision from July 2014.

## Background to the requirement

Chlorine gas is not used for bleaching cellulose pulp in Europe today, but it is still in use in some parts of the world. In the hearing, we were told that chlorine gas and hypochlorite can still be used in the production of cellulose for regenerated cellulose fibres. Because there are good alternative bleaching methods for cellulose pulp today, the previous ban on bleaching with chlorine gas will be continued. When bleaching with chlorine dioxide, residues may arise as a by-product, and these are therefore exempt from the requirement. Hypochlorite is still used in the bleaching of regenerated cellulose fibres in Europe and is prohibited in this revision.

## O27 Regenerated cellulose fibre, process

If the fabric contains more than 30% by weight of regenerated cellulose fibre, Part A must be met. At 0-30% by weight, it is sufficient that part B or part C is met.

### Part A:

Fibre production must be based on "closed loop"\* processes such as the lyocell process, direct spinning of cellulose (the Spinnova process) or similar closed processes.

\* *"Closed loop" is defined here as processes with a high degree of recycling of chemicals that are included (>99%) or processes without release of chemicals.*

### Part B:

Emissions from production with "traditional production process" for regenerated cellulose fibres such as viscose and rayon.

- The sulphur content of the emissions of sulphur compounds to the air shall not exceed 120 g S/kg filament fibre and 30 g/kg staple fibre produced, expressed as an annual average.
- Emissions of zinc to water shall not exceed 0.3 g Zn/kg regenerated cellulose, expressed as an annual average.

### Part C:

Emissions from the production of cupro fibre.

- The copper content of the effluent from the plant that produces cupro fibre shall not exceed 0.1 ppm, expressed as an annual average.

*Information analysis methods and analysis laboratories is given in Appendix 1.*

<sup>85</sup> Nordic Ecolabelling, Forestry requirements. <https://www.nordic-ecolabel.org/certification/paper-pulp-printing/pulp--paper-producers/forestry-requirements/>



- ☒ Part A: Documentation showing that the production of the regenerated cellulose fibres is produced with "closed loop" processes in accordance with the requirement.
- ☒ Part B and C: A test report from the manufacturer showing that the emission requirements are fulfilled. Emissions of sulphur to air can be documented with a valid EU Ecolabel licence in accordance with the Commission's decision from July 2014.

### **Background to the requirement**

The requirements regarding the production of regenerated cellulose have been tightened in this generation of the criteria. The purpose is to promote the more environmentally friendly manufacturing methods such as the lyocell process and the Spinnova process. The requirement now only accepts "closed loop" processes. I.e., processes with more than 98% recycling rate for chemicals used or processes without the use of chemicals. This limits emissions of harmful chemicals to air and water. Examples of such processes are the lyocell process (>99% recovery of biodegradable solvent) and the Spinnova process (mechanical spinning without chemicals). Other newly developed processes can be approved as "closed loop" after the assessment of Nordic Ecolabelling.

A consultation response was given that viscose fibres have desired properties in combination with other types of fibres that the more environmentally friendly regenerated cellulose fibres do not have. It has therefore been opened that 30% of the fibres in the fabric can be viscose fibres that meet the same emissions requirements as before. Since the forest requirement has also been tightened up, the requirement will still promote fibres from the best producers.

### **5.7.5 Synthetic fibre**

Synthetic fibre is subject to the requirement that the fibre must either comprise recycled material, if it is of fossil origin, or be bio-based (see further definition of these in the requirements below). The requirement sets out which types of recycled and bio-based raw materials are acceptable.

#### **O28 Synthetic fibre – fossil origin**

Synthetic fibre of fossil origin must comprise 100% recycled material\*. This must not include recycled plastic from plants that are EFSA\*\* or FDA\*\*\* approved as food contact material or marketed as compatible with these.

#### **Exception:**

- For elastane fibres that are STANDARD 100 by OEKO-TEX (annex 4 class II) certified, an exception is given for up to 10% elastane fibres in the fabric.
- For white\*\*\*\* polyester for professional textiles, an exception is given until June 30<sup>th</sup>, 2024. When using the exception, it is required, that the fibres must be STANDARD 100 by OEKO-TEX (annex 4 class II) certified.

The traceability of the recycled raw material must be documented with either a or b below:

- a) Global Recycled Standard certificate or Recycled Claim Standard certificate showing that the raw material is recycled, or other equivalent certification approved by Nordic Ecolabelling.
- b) By stating the producer of the recycled raw material and documenting that the feedstock used in the raw material is 100% recycled material, see definition in requirement.

*\* Recycled material is defined here in line with ISO 14021 using the following two categories as specified and covers both mechanical and chemical recycling. The definition of chemical recycling used here includes processes in which the end product is either monomers, oligomers or higher hydrocarbons. Chemical recycling processes where the end product of the chemical process is naphtha or pyrolysis oils (energy production) are not covered by the definition of "recycled material". Here, the process itself is considered a recovery rather than recycling.*

**“Pre-consumer/commercial”** is defined as material that is recovered from the waste stream during a manufacturing process. Materials that are reworked or reground, or waste that has been produced in a process, and can be recycled within the same manufacturing process that generated it, are not considered to be pre-consumer recovered material.

Nordic Ecolabelling considers reworked, reground or scrap material that cannot be recycled directly in the same process, but requires reprocessing (e.g., in the form of sorting, re-melting, and granulating) before it can be recycled, to be pre-consumer/commercial material. This is irrespective of whether the processing is done in-house or externally.

**“Post-consumer/commercial”** is defined as material generated by households or commercial, industrial, or institutional facilities in their role as end-users of a product that can no longer be used for its intended purpose. This includes materials from the distribution chain.

*\*\* In line with Commission Regulation (EC) No 282/2008 of 27 March 2008 on recycled plastic materials and articles intended to come into contact with foods.*

*\*\*\* In line with the Code of Federal Regulations Title 21: Food and Drugs, PART 177 – INDIRECT FOOD ADDITIVES: POLYMERS.*

*\*\*\*\* Defined according to the Ganz-Griesser Whiteness Index as the following spectrum: 200-220 GG, Tint 0-3 or equivalent according to the CIE Whiteness Index.*

- Declaration from the producer of the recycled raw material that the raw material is not EFSA or FDA approved, see requirement.
- a) Certificate from an independent certifier of the supply chain (e.g., Global Recycled Standard or Recycled Claim Standard).
- b) Documentation from the producer, showing that the feedstock used in the raw material is 100% recycled material, see definition in requirement.

## Background to the requirement

Nordic Ecolabelling wishes to support a circular economy by encouraging the use of recycled materials over virgin raw material – in this case crude oil. The requirements for the various synthetic fibres have therefore been changed in this generation of the criteria. The criteria now only accept recycled materials as the input for synthetic fossil textile fibres that account for more than 5% by weight of the individual textile element.

Elastane fibres based on recycled material are still not widespread. As elastane is included in many different textile products, an exception has been inserted for elastane fibres for up to a maximum of 10% elastane fibres in the fabric if the elastane fibre instead is STANDARD 100 by OEKO-TEX (annex 4 class II) certified. In the consultation, there came input that it is not possible to achieve the desired whiteness for e.g., tablecloths for restaurants or white bedding for hotels by using polyester from recycled feedstock. For white polyester for professional textiles, a time limited exception until 30-06-2024 is also granted for

the requirement if the polyester fibres are instead STANDARD 100 by OEKO-TEX (annex 4 class II) certified.

Substantial environmental potential is expected in the future with regard to reduce resource consumption and CO<sub>2</sub> emissions<sup>86</sup>, if the textile industry is able to convert textile waste into new raw materials. However, today fibre-to-fibre recycling remains limited for textiles<sup>87</sup>, and recycled polymers from other synthetic materials such as plastics are often used today. The requirement therefore accepts both fibre-to-fibre recycling and polymer-to-fibre recycling. Nordic Ecolabelling wishes to stimulate increased use of recycled materials in textile production, thus avoiding the use of virgin fossil materials. It is currently reasonably possible to use recycled material for fibre types such as polyester and polyamide, but the same options are not as widely available for other fibre types as yet (August 2019). The review “Environmental impact of textile reuse and recycling - A review”<sup>88</sup> describes that there is strong support for claims that textile reuse and recycling in general reduce environmental impact compared to incineration and landfilling, and that reuse is more beneficial than recycling. Benefits mainly arise because of the assumed avoidance of production of new products. There are also scenarios under which recycling may not be beneficial, for example in cases where the avoided production processes are relatively clean.

The requirement therefore seeks to encourage fibre types, that are able to make use of recycled feedstock. Advancements are being made in this area all the time and the possibility of using recycled feedstock may therefore change over time.

Prohibition on the use of re-granulate resulting from reprocessing processes that have obtained an approval pursuant to Commission Regulation (EC) No 282/2008 on recycled plastics materials and articles intended for food contact or approval pursuant to Regulation (EC) No 282/2008 to the Code of Federal Regulations Title 21: Food and Drugs, PART 177 — INDIRECT FOOD ADDITIVES: POLYMERS. These are both approvals for the material to be used for food contact. It is not desirable for textile production to use processed, recycled raw materials approved for food packaging production. Plastic materials approved for food packaging require the highest traceability and purity of the plastic raw material and it will therefore be down cycling to use this plastic for anything other than food contact products.

The requirement states that the feedstock used in the recycled raw material must be traceable. Without traceability, it is difficult to ensure that the material really is recycled. Traceability can be documented with a certificate from a third-party certifier of the supply chain, such as the Global Recycled Standard, for example. The Global Recycled Standard (GRS) is an international, voluntary standard that sets requirements for third-party certification of recycled content and chain of custody in the supply chain. This standard restricts the use of undesirable chemicals in the manufacture of new products, but the standard does not cover chemicals that may enter via the recycled materials, and thus gives no

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<sup>86</sup> Sandin, G, Environmental impact of textile reuse and recycling – A review, Journal of Cleaner Production Volume 184, 20 May 2018, Pages 353-365.

<sup>87</sup> PULSE OF THE FASHION INDUSTRY, Global Fashion Agenda & The Boston Consulting Group 2017.

<sup>88</sup> Sandin, G, Environmental impact of textile reuse and recycling – A review, Journal of Cleaner Production Volume 184, 20 May 2018, Pages 353-365.

guarantee about what may be present in the finished GRS product<sup>89</sup> (see more on undesirable chemicals in recycled materials in requirement O30). Alternatively, traceability may be documented by the producer of the recycled raw material declaring that 100% recycled feedstock has been used.

### Recycled polyester

The main source of recycled feedstock for polyester fibre is currently rPET from used water bottles. PET may be recycled both mechanically and chemically<sup>90</sup>. An LCA conducted for the Nordic Council of Ministers<sup>91</sup> describes the environmental effects of chemical recycling of PET. The analysis shows that chemical recycling is better than incineration of PET, in terms of the following impact categories: climate change, water consumption and total energy consumption, but is worse than incineration when it comes to eutrophication and photochemical ozone creation potential. Several other studies confirm this result. A point is also made about uncertainty linked to data sets originating from the Teijin factory in Japan – one of the only commercial plants in operation today, where waste polyester products are chemically processed into new polyester filament fibres under the brand name ECO CIRCLE™ FIBERS. Teijin also produces rPET from PET bottles for polyester staple fibre and textiles under the brand name EcoPET<sup>92</sup>.

Right now, there is a development in chemical recycling and here is a potential to be able to completely change the PET economy, so that all forms of PET in the future can be recycled and fibre-to-fibre<sup>93</sup>.

### Recycled polyamide

Polyamide (PA, nylon) can be recycled via the mechanical or chemical processing of nylon waste, as happens, for example, in the carpet industry. A comparative LCA study of virgin nylon and recycled nylon for carpet manufacturing, conducted for Shaw Carpets (2010) and reviewed by LBP-GaBi University of Stuttgart, highlights significant environmental benefits from the use of recycled nylon. There are, however, still only a limited number of recycled nylon suppliers. Econyl is one of the leading suppliers, with its nylon 6 for textile production, which uses a chemical process with 100% pre- and post-consumer recycled content<sup>94</sup>. The split is around 50% pre- and 50% post-consumer<sup>95</sup>. There are several examples of textile brands that use Econyl in their polyamide products. An EPD for Econyl declares that ECONYL® polymer is free from substances that are harmful to health and the environment due to being carcinogenic, mutagenic or reprotoxic, allergenic, PBT or vPvB<sup>96</sup>.

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<sup>89</sup> Global Recycled Standard <http://textileexchange.org/wp-content/uploads/2017/06/Global-Recycled-Standard-v4.0.pdf>

<sup>90</sup> Ragaert, K. Mechanical and Chemical Recycling of Solid Plastic Waste, 2017 Waste Management publication.

<sup>91</sup> Nordic Council of Ministers (2016). Gaining benefits from discarded textiles: LCA of different treatment pathways.

<sup>92</sup> Nordic Council of Ministers (2016). Gaining benefits from discarded textiles: LCA of different treatment pathways.

<sup>93</sup> Chemical Recycling, Making Fiber-to-Fiber Recycling a Reality for Polyester Textiles, GreenBlue 2018 hentet fra <https://greenblue.org/work/chemical-recycling/>

<sup>94</sup> <http://www.econyl.com/textile-yarn/>

<sup>95</sup> <https://www.bipiz.org/en/advanced-search/aquafil-econyl-or-how-to-produce-nylon-6-from-100-regenerated-materials.html>

<sup>96</sup> ENVIRONMENTAL PRODUCT DECLARATION for ECONYL® POLYMER, Aquafil 2013 and updated 2017.

## Recycled polyurethane

Sheico Group, a Taiwanese sportswear manufacturer that also produces spandex, is able to produce 100% spandex with Global Recycled Standard (GRS) certification. Their Sheiflex spandex yarn is made from 100% recycled industrial waste spandex from its own and competitors' production lines. Sheico has managed to recycle spandex following the development of new technology. To ensure that the polymer from the waste yarn is dissolved homogeneously, so the recycled spandex can offer the same stability and quality as virgin spandex, an analysis of the recycled fibre is required in order to adjust the purity and viscosity before spinning<sup>97</sup>.

### O29 Synthetic fibre – bio-based origin

Synthetic fibres of bio-based origin must contain at least 90% bio-based raw material, documented by testing in accordance with ISO 16620, ASTM D6866 or equivalent standard.

Raw materials used in the production of bio-based polymer fibres (e.g., polyester and polyamide) must meet the following requirements.

#### **Palm oil, soybean oil and soy flour**

Palm oil, soybean oil and soy flour must not be used for bio-based polymer fibre in the textile.

#### **Specific conditions for sugar cane**

The raw materials must meet either a) or b):

- a) Waste\* or residual products\*\* defined in accordance with (EU) Renewable Energy Directive 2018/2001. There must be traceability back to the production / process where the residual production occurred.
- b) Sugar cane must not be genetically modified\*\*\*. Sugar cane must also be certified to Bonsucro standard, version 5.1 or later version or certified to a standard that meets the requirements described in appendix 3.

The producer of the bio-based polymer must have a chain of custody (CoC) certification according to the standard by which the raw material is certified. Traceability must at least be ensured by mass balance. Book and claim systems are not accepted.

The producer of the bio-based polymer must document its purchase of certified raw materials for polymer production, for example in the form of specifications on an invoice or delivery note.

#### **Other raw materials**

The name (in Latin and a Nordic or English) and supplier of the raw materials used must be stated.

The raw materials must meet either c) or d):

- c) Waste\* or residual products\*\* defined in accordance with (EU) Renewable Energy Directive 2018/2001. There must be traceability back to the production/process where the residual production occurred.
- d) Primary raw materials (e.g., corn), not genetically modified\*\*\*. Here geographical origin (country/state) must be stated.

\* Waste as defined by EU Directive 2018/2001/EC.

\*\* Residual products as defined by EU Directive 2018/2001/EC. Residues come from agriculture, aquaculture, fisheries, and forestry, or they can be processing

<sup>97</sup> Spandex gets recycled certification, <https://www.ecotextile.com/2017110723070/labels-legislation-news/spandex-gets-recycled-certification.html> (accessed 26.02.2019)

*residues. A processing residual product is a substance that is not one of the end products that the production process directly strives for. Residues must not be a direct target of the process and the process must not be changed to intentional production of the residual product. Examples of residual products are e.g., straw, husks, pods, the non-edible part of maize, manure, and bagasse. Examples of processing residues are e.g., raw glycerine or brown lye from paper production. Palm Fatty Acid Distillate (PFAD) from palm oil is not considered a residual/waste product and can therefore not be used.*

*Test according to ISO 16620, ASTM D6866 or equivalent standard showing content of bio-based raw material.*

- ☒ Declaration by the producer of the polymer, that palm oil (incl. PFAD (Palm Fatty Acid Distillate)) soybean oil and soy flour are not used as raw materials for the bio-based polymer.
- ☒ For waste and residual products: Documentation from the polymer producer which shows that the requirement's definition of waste or residual products is met, as well as traceability which shows where the waste or residual product comes from.
- ☒ Sugar cane: Indicate which certification system sugar cane is certified for. A copy of a valid CoC certificate or a certificate number. Documentation such as an invoice or delivery note from the producer of the bio-based polymer, showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer. Declaration stating that the sugar cane has not been genetically modified.
- ☒ For primary raw materials: Declaration by the producer of the polymer stating that raw materials have not been genetically modified according to the definition in the requirement. Name (in Latin and English) and geographical origin (country/state) of the primary raw materials used.

## Background to the requirement

The requirement is new to these criteria and makes it possible to use bio-based polymer fibre. The requirement has been set to ensure that the renewable raw materials used do not originate from agricultural land created from the destruction of rainforest or the clearance of other valuable ecosystems. In terms of resources, the requirement promotes the use of renewable raw materials over virgin fossil materials. It is, however, important that the bio-based raw materials are grown sustainably. Even renewable raw materials may be associated with environmental and social problems.

There are several examples of bio-based polyester on the market, including Virent's BioFormPX paraxylene<sup>98</sup> and Ecodear® PET<sup>99</sup>. However, not all the mentioned bio-based polyester products meet the requirement here for at least 90% biomass in the polymer. It is not clear which biomass is used for these particular fibres but starch and sugar from sugar cane, sugar beet and maize are often used for the production of bio-based polymers. Starch currently accounts for 80% of the feedstock for biopolymers<sup>100</sup>. Castor oil, or oils such as soya or palm oil tend to be used to produce bio-based polyamide.

The establishment of palm oil plantations is one of the main causes of rainforest destruction, which threatens the existence of indigenous peoples, plants, and animals. Rainforests are particularly important for biodiversity, as they are the

<sup>98</sup> <http://www.virent.com/news/virent-bioformpx-paraxylene-used-to-produce-worlds-first-100-plant-based-polyester-shirts/> accessed 20.02.2019.

<sup>99</sup> [https://www.toray.com/products/fibers/fib\\_0131.html](https://www.toray.com/products/fibers/fib_0131.html) accessed 20.02.2019.

<sup>100</sup> <https://aboutbiosynthetics.org/feedstock-to-fashion/> accessed 20.02.2019.

most species-rich ecosystems on the planet<sup>101</sup>. Soya beans are grown on land that is often established in the place of rainforest and savannah in South America. Soya production is one of the greatest threats to the rainforest on the American continent, particularly in the southern Amazon<sup>102</sup>.

## GMO

The requirement is new, as bio-based polymer fibre was not previously covered by the criteria. The requirement prohibits the use of genetically modified agricultural raw materials in bio-based polymer fibre. Process chemicals and raw materials, e.g., proteins, which are produced by the use of genetically modified microorganisms in closed systems, are not themselves GMOs or genetically modified, and Nordic Swan Ecolabelling do not consider such production as problematic.

GMO (genetically modified organisms) is a highly debated topic, and several countries have banned GMO cultivation. Topics discussed are food safety, land use, lack of knowledge of impacts under local agriculture/forest conditions and risk of adverse environmental and health impacts. Nordic Ecolabelling emphasizes the precautionary principle and is based on regulations that have a holistic approach to GMO, where sustainability, ethics and social benefits must be emphasized together with health and the environment. It is important to stress that Nordic Ecolabelling is not opposed to the technology itself but is concerned about the consequences of GM plants spreading in nature.

Research results have not clearly shown that today's GMO crops contributes to development towards sustainable agriculture with less use of pesticides. At the same time research on long-term effects of genetically modified plants, both environmental and socio-economic consequences, is lacking. There are potential adverse effects of GMOs along the entire value chain from research and development of plants, through cultivation, to storage, use and waste management<sup>103, 104, 105</sup>. In several of these stages, there is a lack of scientific studies, and a lack of assessment of the overall picture<sup>106</sup>. Today's GMOs are also adapted to industrial agriculture with companies that have obtained a monopoly-like position, and Nordic Ecolabelling wants to help limit the negative consequences of this.

### 5.7.6 Recycled fibres

#### O30 Recycled fibres/raw materials, test for environmentally harmful substances

Recycled fibres/raw materials for fibre production shall not contain the following substances above the limits stated in the table below.

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<sup>101</sup> OLSEN LJ, FENGER NA & GRAVERSEN J 2011. Palm oil – Denmark's role in the global production of palm oil. WWF Report DK. WWF World Wide Fund for Nature, Denmark.

<sup>102</sup> <http://www.worldwildlife.org/industries/soy>, (27.01.2016).

<sup>103</sup> Catacora-Vargas G (2011): "Genetically Modified Organisms – A Summary of Potential Adverse Effects Relevant to Sustainable Development. Biosafety Report 2011/02, GenØk – Centre for Biosafety.

<sup>104</sup> Fischer et al. (2015) Fischer et al. (2015): Social impacts of GM crops in agriculture: a systematic literature review. Sustainability 7:7.

<sup>105</sup> Catacora-Vargas G et al. (2018): Socio-economic research on genetically modified crops: a study of the literature. Agriculture and Human Values 35:2.

<sup>106</sup> Kolseth et al (2015) Influence of genetically modified organisms on agro-ecosystem processes. Agriculture, Ecosystems and Environment. 214 (2015) 96–106.

This requirement applies to all recycled fibres – both synthetic and natural and must be documented annually with either a) or b):

- a) an Oeko-Tex standard 100 class I certificate or
- b) test report showing that the requirement is complied with.

Exemption to the requirement:

- Material from PET bottles original approved for food contact
- Fibres from chemically recycled\* polymers, if it can otherwise be documented that the process ensures, that the requirement limits are complied with.
- Fibres used in the production of regenerated cellulose.
- Fibres, where it can be documented that they originate from type I eco-labeled products.

*\* The definition of chemical recycling used here includes processes in which the end product is either monomers, oligomers or higher hydrocarbons. Chemical recycling processes where the end product of the chemical process is naphtha or pyrolysis oils (energy production) are not covered by the definition of "recycled material". Here, the process itself is considered a recovery rather than recycling.*

The requirement must be documented on application, with subsequent annual checks via self-assessment.

Substance/substance group	Max. limit
<b>Extractable metals</b>	
Chromium total	1.0 mg/kg
Lead	0.1 mg/kg
Mercury	0.02 mg/kg
Cadmium	0.1 mg/kg
Antimony	30.0 mg/kg
<b>Organic tin compounds</b>	
TBT and TPhT	0.5 mg/kg
Total of DBT, DMT, DOT, DPhT, DPT, MOT, MMT, MPhT, TeBT, TeET, TCyHT, TMT, TOT, TPT	1.0 mg/kg
<b>Chlorophenols</b>	
Pentachlorophenol	0.05 mg/kg
Tetrachlorophenol	0.05 mg/kg
Trichlorophenol	0.2 mg/kg
Dichlorophenol	0.5 mg/kg
Monochlorophenol	0.5 mg/kg
<b>Per- and polyfluorinated compounds</b>	
PFOS, PFOSA, PFOSF, N-Me-FOSA, N-Me-FOSE, N-Et-FOSE	Total <1.0 µg/m <sup>2</sup>
PFOA	<1.0 µg/m <sup>2</sup>
PFHpA, PFNA, PFDA, PFUdA, PFDoA, PFTTrDA, PFTeDA	0.05 mg/kg for each
Other stated per- and polyfluorinated compounds as set out in Oeko-Tex 100 Annex 5.	0.05 or 0.5 mg/kg for each as stated in Oeko-Tex 100
<b>Phthalates</b>	
BBP, DBP, DEP, DMP, DEHP, DMEP, DIHP, DHNUP, DCHP, DHxP, DIBP, DIHxP, DIOP, DINP, DIDP, DPpP, DHP, DNOP, DNP, DPP	Total 0.1 weight%
<b>Flame retardants</b>	
Flame retardants, with the exception of flame retardants approved by Oeko-Tex	<100 mg/kg for each
Formaldehyde	16 mg/kg



Arylamines with carcinogenic properties stated in Oeko-Tex 100 Annex 5	Total 20 mg/kg
<b>Surfactant, wetting agent residues</b>	
Nonylphenol, octylphenol, heptylphenol, pentylphenol	Total 10 mg/kg
Nonylphenol, octylphenol, heptylphenol, pentylphenol, nonylphenol ethoxylate and octylphenol ethoxylate	Total 100 mg/kg
<b>Dyes</b>	
Cleavable, classified as carcinogenic in Oeko-Tex Annex 5	Total 20 mg/kg
Cleavable aniline as listed in Oeko-Tex Annex 5	Total 100 mg/kg
Classified as carcinogenic in Oeko-Tex Annex 5	50 mg/kg
Dyes classified as allergenic in Oeko-Tex Annex 5	50 mg/kg
Other dyes listed in Oeko-Tex Annex 5	50 mg/kg
<b>Pesticides (for recycled natural fibre)</b>	
Pesticides listed in Oeko-Tex 100 Annex 5	Total 0.5 mg/kg
<b>For acrylic, elastane, polyurethane and polyamide</b>	
DMAC	0,1 weight% solvent residue

Test methods: as stated in Testing Methods Standard 100 by Oeko-Tex.

- ☒ Test reports or Oeko-Tex 100 class I certificate showing fulfilment of the requirement. A written procedure showing how an annual test is performed in line with the requirement, along with annual in-house checks of compliance with the requirement. Alternatively, a procedure for annual requisition of Oeko-tex 100 class I certificate. Test results/certificate are to be archived and kept available for inspection by Nordic Ecolabelling.
- ☒ When using chemically recycled polymers documentation showing that the recycling process ensures that the requirement is complied with.
- ☒ When using the exemption for material from PET bottles, this must be documented by the fibre supplier.
- ☒ When using an exemption for fibres from earlier type in ecolabelled textiles, this must be documented by the fibre supplier.

## Background to the requirement

The requirement is new in this generation of the criteria, which now contains a requirement, for example, that synthetic fibre must use recycled material as the constituent raw material. It is important to consider the potential exposure of the user and the environment to undesirable chemicals from recycled material. The requirement covers the chemical substances and substance groups that are at greatest risk of being present in recycled fibre for textile production. Recycled fibre may contain residues of additives from previously used dyes, pesticides from cultivation, biocides used during transport, and so on<sup>107</sup>. This applies to both fibres recovered from used textiles and fibre recovered from products other than textiles e.g., plastic products. Even if the textile is washed several times, unwanted chemicals may still be present in the recycled fibre. In mechanical recycling processes, all the chemical substances remain in the material and may be transferred to the new textile fibre<sup>108</sup>. In chemical recycling processes such as pyrolysis and gasification - the plastic as well as most of their additives and any contaminants are converted into basic chemicals. For other recycling processes

<sup>107</sup> IKEA and H&M analyze the content of recycled fabrics, article 29-10-2019 on Treehugger.com [https://www.treehugger.com/sustainable-fashion/ikea-and-hm-analyze-content-recycled-fabrics.html?utm\\_source=TreeHugger+Newsletters&utm\\_campaign=9cd1c025b2-EMAIL\\_CAMPAIGN\\_11\\_16\\_2018\\_COPY\\_01&utm\\_medium=email&utm\\_term=0\\_32de41485d-9cd1c025b2-243762625](https://www.treehugger.com/sustainable-fashion/ikea-and-hm-analyze-content-recycled-fabrics.html?utm_source=TreeHugger+Newsletters&utm_campaign=9cd1c025b2-EMAIL_CAMPAIGN_11_16_2018_COPY_01&utm_medium=email&utm_term=0_32de41485d-9cd1c025b2-243762625)

<sup>108</sup> Nordic Council of Ministers (2016). Gaining benefits from discarded textiles: LCA of different treatment pathways.

such as depolymerization, where the chemical structures are preserved, it can not necessarily be ensured that no harmful additives and contaminants from the incoming plastic waste are included. It is possible to conduct a spot test for the most relevant substances over a set interval, but since the recycled feedstock may come from multiple sources and can therefore vary a great deal, it is not possible to implement the testing required to identify all the potential “old additives”.

Recycled fibre from PET bottles may also contain small amounts of undesirable substances such as antimony and heavy metals, which are derived from labels, adhesives, printing inks and waste from the transport and sorting of the plastic. However, measurements have established that the levels fall well below the limits set for heavy metals in packaging materials in California’s Toxics in Packaging Prevention Act of 2006<sup>109</sup>.

### 5.7.7 Additives and fibre treatment

The requirement relates to any additives and coatings applied to the fibre. The requirement concerns all fibre types.

#### O31 Treatment and coating of fibre and yarn

Any fibre treatment or coating must meet the following requirements: O33 Classification of chemical products, O34 Prohibition of CMR substances, O35 Prohibited substances\* and O41 Chemicals that contains silicone.

Specific for treatment or coating of wool to prevent felting:

- Chlorine and fluorine compounds are prohibited.
- Wool fibres shall only be coated with biodegradable\*\* coating

\* *An exception is made for added nano titanium dioxide in the production of regenerated cellulose.*

\*\* *Coating must be aerobically degradable according to OECD 301 A-F or OECD 310 (readily biodegradable) or 302 A-C (inherently biodegradable).*

- ☒ Declaration from the fibre producer/supplier that requirement is fulfilled, and description of and safety data sheet for additives and coatings applied to the fibre.
- ☒ For coating of the wool fibre: Documentation showing that the coating is degradable in accordance with the requirement.

#### Background to the requirement

This generation of the criteria contains a separate requirement concerning treatment and coatings of the fibre. This to make it clear that these chemicals are subject to certain requirements. The requirement has been set to avoid the addition of harmful substances to the fibre or to be used in the treatment of the fibre. This applies to chemicals used in treating the fibre, such as chlorine treatment of wool fibre or softeners, and to substances that are present in chemicals used to coat the fibre.

#### Coating of wool fibers

The requirement only accepts wool fibre coating, if it is documented that the coating is biodegradable according to OECD 301 A-F or OECD 310 (readily biodegradable) or 302 A-C (inherently biodegradable). Wool fibres may have a

<sup>109</sup> M. Whitt, Survey of heavy metal contamination in recycled polyethylene terephthalate used for food packaging, Journal of Plastic Film & Sheeting 2012.

polymer coating to reduce shrinkage during washing. The purpose of this requirement is to avoid coating natural fibre such as the wool fibre with a polymer which may interfere with the possibility of the wool fibre being degraded and thus give rise to microplastics contamination if released either by use or washing of the woollen fabric<sup>110</sup>. There is no clear evidence of how coating with a polymer impact the overall biodegradability of the wool fibre. However, when there are alternative solutions on the market today, which the Nordic Swan Ecolabelling of textiles wants to promote. Here, you can choose either an anti-shrinkage treatment of the wool fibre (e.g., selected plasma or enzyme treatments) that does not include coating the fibre or using a coating that is biodegradable according to OECD 301 AF or OECD 310 (readily biodegradable) or 302 AC (inherently biodegradable).

### **Silicone**

Many of the chemicals used as softeners or fibre and yarn coatings are based on silicone. The production of these chemicals makes use of the cyclic siloxanes D4, D5 and D6. These cyclic siloxanes are included in the EU's Candidate List, as they are persistent, bio accumulative and toxic (PBT/vPvB substances). If silicone is used for coating Nordic Ecolabelling sets a requirement in O41 that residual levels of D4, D5 or D6 in the silicone mix must not exceed 0.1 weight% (1000 ppm) of each. This limit value has been chosen to correspond with the threshold for mandatory inclusion of information on the substances on a safety data sheet.

### **Treatment of wool**

A large proportion of the wool used for clothing today is treated to withstand machine washing without shrinkage and not to scratch when used. The Nordic Swan Ecolabel criteria do not allow the use of chlorinated wool, such as the anti-shrink treatment, chlorine-Hercosett process. When wool is chlorinated, absorbable organic halogens (AOXs) are formed which are discharged together with the wastewater. The chlorinated organic compounds are undesirable in the environment. Carbon filters can be used to reduce the emission of AOX compounds, but not completely eliminate the emission to wastewater. At the same time, there will be a risk of discharging AOX compounds in subsequent dyeing processes. There are alternative treatments for wool fibres, such as plasma treatment and enzyme treatment, that do not lead to the release of environmentally harmful chlorine compounds. In addition, the two alternative treatment methods mentioned may provide the desired effect without coating with non-biodegradable polymer.

## **5.8 Chemicals used in textile production**

### **General background to the new chemical requirements in generation 5**

The structure of the chemical requirements has been changed in this generation of the criteria, and the requirements have been tightened. There is now a requirement that excludes certain classifications of both chemicals and ingoing substances, irrespective of the type of chemical concerned. There is also a requirement concerning prohibited substances that similarly covers all production chemicals. The requirements in the previous generation of the criteria

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<sup>110</sup> Hassan MM, Carr C (2019) A Review of the Sustainable Methods in Imparting Shrink Resistance to Wool Fabrics. *Journal of Advanced Research* 18:39–60.

focused more on specific processes and chemical types, such as classification requirements for dyes, colourants and pigments, chemicals for finishing and softeners and solvents. The advantage of these requirements now being set for all production chemicals is that it facilitates clearer communication of what Nordic Swan Ecolabelling of textiles means and makes sure there are no loopholes that allow problematic textile chemicals to fall outside the remit of the set requirements. The various treatments and processes may take place at different stages of textile production, and it is therefore important that the requirement is clear no matter where in the production process the chemical is used.

It is also now clarified that the 11 groups of substances from Greenpeace's Detox My Fashion campaign<sup>111</sup> are prohibited in the production of Nordic Swan Ecolabelled textiles (see requirement O35 Prohibited substances). In addition, Nordic Ecolabelling has a stricter limit value than many other ecolabelling schemes that require these substance groups not to be present in the products. This is because, within its process, Nordic Ecolabelling besides checking all the safety data sheets for chemicals used also has a further dialogue with the chemical manufacturers. The chemical manufacturers are required, for example, to declare the absence of the prohibited substances. This means that they are not added to or present (0 ppm) in the chemicals. Nordic Ecolabelling's definition of an ingoing substance can be found in chapter 5.2, which also defines examples of impurities (in amounts below 100 ppm).

These include residues of monomers, catalysts, by-products, cleaning agents for production equipment and carry-over from other/previous production lines.

There are still additional requirements concerning specific process chemicals, such as the requirement addressing biodegradable detergents and sizing preparations, where it is necessary to have requirements that are relevant only to these processes.

The requirements in this section apply to all chemicals used in the production of textiles, unless otherwise is specified in the requirement. Examples of chemicals include softeners, bleaching agents, pigments and dyes, stabilisers, dispersants, sizing agents, enzymes, and other auxiliary chemicals. The chemicals are used in a variety process in textile production, including carding, spinning, weaving, knitting, washing, bleaching, dyeing, printing, and finishing. The requirements apply irrespective of whether the textile producer or their supplier uses the chemicals.

Chemicals used in water treatment plants or for the maintenance of production equipment are exempted from the requirements.

## 5.8.1 General chemical requirements

### O32 Overview of chemicals

All chemical products shall be stated and documented with a safety data sheet. A collective list or separate lists shall be drawn up for each production process and/or supplier, including for printing on textiles and products.

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<sup>111</sup> Destination Zero: Seven Years of Detoxing the Clothing Industry, [https://storage.googleapis.com/planet4-international-stateless/2018/07/destination\\_zero\\_report\\_july\\_2018.pdf](https://storage.googleapis.com/planet4-international-stateless/2018/07/destination_zero_report_july_2018.pdf) accessed 07.08.2019.

The following information shall be submitted for each chemical product:

- trade name
  - the function of the chemical
  - the process step in which the chemical product is used
  - the supplier/producer using the chemical product
- List of chemicals for every production process and/or supplier.
- Safety data sheet for every chemical product, in line with Annex II of REACH 1907/2006.

## Background to the requirement

To gain an overview of which chemicals are used in the various processes in the textile production after fibre production, the criteria require the submission of a list of all the chemicals used.

### O33 Classification of chemical products

Chemical products shall not be classified as any of the hazard categories set out in the table below.

CLP Regulation 1272/2008		
Hazard class	Hazard category	Hazard code
Toxic to aquatic life	Aquatic Acute 1	H400
	Aquatic Chronic 1	H410
	Aquatic Chronic 2	H411
Hazardous to the ozone layer	Ozone	H420
Carcinogenicity*	Carc 1A or 1B	H350
	Carc 2	H351
Germ cell mutagenicity*	Muta. 1A or 1B	H340
	Muta. 2	H341
Reproductive toxicity*	Repr. 1A or 1B	H360
	Repr. 2	H361
	Lact.	H362
Acute toxicity	Acute Tox 1 or 2	H300, H310, H330
	Acute Tox 3	H301, 311, 331
Specific target organ toxicity with single or repeated exposure	STOT SE 1	H370
	STOT RE 1	H372
Sensitising on inhalation or skin contact	Resp. Sens. 1, 1A or 1B	H334**
	Skin Sens. 1, 1A or 1B	H317**

\* Including all combinations of stated exposure route and stated specific effect. For example, H350 also covers the classification H350i.

Note that responsibility for correct classification lies with the manufacturer.

\*\* Non-disperse dyes are exempt from the prohibition of H334 and H317, provided that non-dusting formulations are used or that automatic dosing is used. If manual filling of automatic dosing systems is used, the manual handling must be carried out using the correct personal protective equipment in accordance with the safety data sheet (SDS) and/or using technical measures such as local extraction/ventilation.

- Declaration from the chemical manufacturer that the requirement is fulfilled.
- For exempted non-disperse dyes: Declaration that non-dusting formulations of these are used or that automatic dosing is used.
- Routine for the use of personal protective equipment when manually handling dusty colours or a description of technical measures.

## Background to the requirement

The requirement has been significantly tightened since the previous generation of the criteria, since it now covers all chemical products used in the textile production, where the requirement previously covered chemicals for specific functions such as dyes and pigments, finishing products and softeners and solvents in coatings. In addition, the requirement has been expanded to also exclude classification as H370 (Causes damage to organs) and H372 (Causes damage to organs through prolonged or repeated exposure). There is an additional requirement that excludes disperse dyes and other chemicals that are classified as H334 (May cause allergy or asthma symptoms or breathing difficulties if inhaled) and H317 (May cause an allergic skin reaction). Similar prohibitions existed in the previous generation of criteria. Since disperse dyes are not covalently bonded to the textile fibre, their colour fastness will often be lower. There is therefore assessed to be a greater risk of exposure to disperse dyes. As a consequence, stricter requirements are set for disperse dyes that are classified as allergenic<sup>112</sup>.

In generation 4 of the criteria, requirement O31 (Dyes, colourants, and pigments) excluded 30 specific dyes. These dyes are either CMR or potentially allergenic.

Seven dyes have a harmonised classification in ECHA as CMR substances and a further two have a CMR self-classification. These nine dyes will thus now be excluded under the CMR ban in this requirement. The remaining are dispersing dyes, the majority of which are classified as H317 (self-classification).

These are therefore also excluded in this requirement. It should also be noted that several of these dyes are no longer in use.

### O34 Prohibition of CMR substances

Chemical products shall not contain any ingoing substances\* that have any of the classifications in the table below.

\* See the definition of ingoing substances and impurities in section 5.2.

CLP Regulation 1272/2008		
Hazard class	Hazard category	Hazard code
Carcinogenicity*	Carc. 1A or 1B Carc. 2	H350 H351**
Germ cell mutagenicity*	Muta. 1A or 1B Muta. 2	H340 H341
Reproductive toxicity*	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362

\* Including all combinations of stated exposure route and stated specific effect. For example, H350 also covers the classification H350i.

\*\* **Exemption:** Titanium dioxide (TiO<sub>2</sub>) which is added in powder form during raw material production.

Declaration from the chemical producer, that the requirement is fulfilled.

<sup>112</sup> JRC Technical Reports, Revision of the European Ecolabel and Green Public Procurement (GPP) Criteria for Textile Products, Nov 2013, page 304:  
[http://ec.europa.eu/environment/ecolabel/documents/140124%20Ecolabel%20Textiles\\_Technical%20report%20final.pdf](http://ec.europa.eu/environment/ecolabel/documents/140124%20Ecolabel%20Textiles_Technical%20report%20final.pdf)

## Background to the requirement

The requirement excludes all constituent CMR substances to an absolute level of 0 ppm. There is thus no triviality limit for ingoing substances. Ingoing substances are defined as all substances, whatever their concentration, in a used chemical (e.g., pigment or bleaching agent) or blend of chemicals (e.g., printing paste, coating), including additives (e.g., preservatives and stabilisers). Known products released from ingoing substances (e.g., formaldehyde, arylamine and in-situ generated preservatives) are also considered to be constituent. Impurities are defined as residual substances from production, including raw material production, that are present in a used chemical or blend of chemicals in concentrations of  $\leq 100$  ppm ( $\leq 0.0100$  weight%,  $\leq 100$  mg/kg).

The requirement has been changed since the previous generation of the criteria. The prohibition of all ingoing CMR substances in categories 1A, 1B and 2 now has its own separate requirement. Nordic Ecolabelling strives to ensure that the health and environmental impacts of the products are as low as possible. Therefore, there is a requirement prohibiting specific CMR classification, which thereby excludes some of the, in health terms, most problematic classifications of substances. The requirement covers all chemicals used in the textile production, to ensure a focus on this in all processes that make use of chemicals.

After consultation, an exception has been made for titanium dioxide which is added in powder form during raw material production. On February 18, 2020, the European Commission published the decision that titanium dioxide will be classified as a suspected carcinogen (Category 2, H351) upon inhalation under the CLP Regulation. The classification is only applicable to mixtures in the form of powders containing at least 1% of titanium dioxide particles which are in the form of or incorporated into particles having an aerodynamic diameter of  $\leq 10$   $\mu\text{m}$ . The classification provision has been debated, as the risk that gives rise to the hazard classification applies to inhalation of powder, and not the chemical substance itself. Liquid and certain solid mixtures of titanium dioxide are not classified. It can be difficult to find replacements in the short term, which is why Nordic Ecolabelling has made an exception for the use of titanium dioxide in powder form.

### O35 Prohibited substances

The following substances shall not be an ingoing substance\* in chemical products:

\* See the definition of ingoing substances and impurities in section 5.2.

- Substances on the Candidate List (<https://echa.europa.eu/candidate-list-table>) Siloxanes D4, D5 and D6 have their own documentation requirement, see requirement O41.
- Substances that are PBT (Persistent, Bioaccumulative, and Toxic) or vPvB (very Persistent and very Bioaccumulative) as set out in the criteria of REACH Annex XIII
- Potential or identified endocrine disruptors according to any of the EU member state initiative "Endocrine Disruptor Lists", List I, II and III\*\*\*. See the following links:
  - <https://edlists.org/the-ed-lists/list-i-substances-identified-asendocrine-disruptors-by-the-eu>

- <https://edlists.org/the-ed-lists/list-ii-substances-under-eu-investigation-endocrine-disruption>
- <https://edlists.org/the-ed-lists/list-iii-substances-identified-asendocrine-disruptors-by-participating-national-authorities>
  - Flame retardants (e.g., short chain chlorinated paraffins)
  - Per- and polyfluoroalkyl substances (PFASs), e.g., PFOA and PFOS
  - Nanomaterials/-particles\*
  - Heavy metals in dyes and pigments\*\*
  - Azo dyes that may release carcinogenic aromatic amines (see Appendix 2)
  - Phthalates
  - Chlorinated solvents and carriers, including chlorotoluenes, chlorophenols and chlorobenzenes
  - Alkylphenol ethoxylates (APEO) and other alkylphenol derivatives
  - Organotin compounds
  - Linear alkylbenzene sulphonates (LAS)
  - Quaternary ammonium compounds such as DTDMAC, DSDMAC and DHTDMAC
  - EDTA (ethylene diamine tetraacetic acid) and DTPA (diethylene triamine pentaacetate)

\* *The definition of nanomaterial follows the European Commission's definition of nanomaterial of 18 October 2011 (2011/696/EU). Pigments are exempted from the requirement.*

\*\* *Heavy metals are the metals listed in point 2 below. Exemptions from the requirement are granted for:*

1) *copper in metal complex dyes, see requirement O37.*

2) *metal impurities in dyes and pigments up to the amounts set out in ETAD, Annex 2 "Heavy metal limits for dyes": antimony (50 ppm), arsenic (50 ppm), cadmium (20 ppm), chromium (100 ppm), lead (100 ppm), mercury (4 ppm), zinc (1500 ppm), copper (250 ppm), nickel (200 ppm), tin (250 ppm), barium (100 ppm), cobalt (500 ppm), iron (2500 ppm), manganese (1000 ppm), selenium (20 ppm) and silver (100 ppm)*

3) *exception for iron used for colour depigmenting before printing.*

\*\*\* *A substance which is transferred to one of the corresponding sub lists called "Substances no longer on list", and no longer appears on any of List I-III, is no longer excluded. The exception is those substances on sub list II which were evaluated under a regulation or directive which doesn't have provisions for identifying EDs (e.g., the Cosmetics Regulation, etc.). For those substances, ED properties may still have been confirmed or suspected. Nordic Ecolabelling will evaluate the circumstances case-by-case, based on the background information indicated on sub list II.*

- Declaration from the chemical manufacturer or chemical supplier that the requirement is fulfilled.

## Background to the requirement

The list of prohibited substances has been expanded in comparison with the previous generation of the criteria, with the requirement now covering the 11 substance groups that the textile industry widely agrees are relevant for phasing out. The list of the 11 substance groups derives from the "Detox My Fashion"



initiative that Greenpeace launched in 2011. Other initiatives such as Detox to Zero by Oeko-Tex and ZDHC also refer to this list of substances. The previous generation of the criteria included most of these substance groups in separate requirements. The decision has now been taken to gather them all together here, with the prohibition list covering all chemicals used in the textile production.

Under this requirement, Nordic Swan Ecolabelled textiles are subject to a prohibition list that covers, with third-party audits, all 11 substance groups on Greenpeace's Detox List in the production of textiles. Nordic Ecolabelling defines "prohibition" as follows: The prohibition of specific ingoing substances encompasses all substances, whatever their concentration in a used chemical or chemical blend, including additives and known products released from ingoing substances. Impurities cannot, however, always be completely avoided. The only permitted impurities are residual products from production, including raw material production, that can be found in a used chemical in concentrations below 100 ppm. Such impurities may be reagents such as monomers, catalysts, by-products or carry-over from previous production lines. See the precise definition of ingoing substances and impurities in section 5.2.

Some of the substance groups and substances in the requirement may already have their use restricted in the EU. It is however still considered relevant to exclude these and require documentation confirming their absence, not least because many textiles are produced outside the EU. In comparison with the earlier generation of the criteria, this requirement has been expanded to include flame retardants and azo dyes, amongst other things. Both groups were previously prohibited, but the requirement was worded differently.

### **Candidate List and Substances of Very High Concern (SVHC)**

Substances of Very High Concern (SVHC) is a term describing substances that fulfil the criteria in Article 57 of the REACH regulation, which are defined as: substances that are CMR (category 1A and 1B under the CLP Regulation), PBT substances, vPvB substances (see section below) and substances that have endocrine disruptive properties or are environmentally harmful without meeting the criteria for PBT or vPvB. SVHC may be included on the Candidate List with a view to later inclusion on the Authorisation List. This means that the substance becomes regulated (ban, phasing out or some other form of restriction). Due to these undesirable properties, substances on the Candidate List cannot be Nordic Swan Ecolabelled. Other SVHC substances are dealt with through a ban on PBT and vPvB substances and through requirements concerning classification and a ban on endocrine disruptive substances.

### **PBT and vPvB**

PBT (Persistent, Bioaccumulative and Toxic) and vPvB (very Persistent and very Bioaccumulative) are organic compounds defined in Annex XIII of REACH (Regulation (EC) No 1907/2006). Nordic Ecolabelling generally does not want such substances to be included in the products.

### **Potential endocrine disruptors**

Potential endocrine disruptors are substances that may affect the hormone balance in humans and animals. Hormones control a number of vital processes in the body and are particularly important for development and growth in humans, animals and plants. Changes in the hormone balance can have unwanted effects

and here there is an extra focus on hormones that affect sexual development and reproduction. Several studies have shown effects on animals that have been traced to changes in hormone balance. Emissions to the aquatic environment are one of the greatest sources for the spread of endocrine disruptors<sup>113</sup>. Nordic Ecolabelling excludes identified and potential endocrine disruptors listed on the "Endocrine Disruptor Lists" at [www.edlists.org](http://www.edlists.org), which is based on the EU member state initiative. A substance listed in List I, II and/or III is excluded. Licencees are responsible for keeping track of updates of the lists, so that their ecolabelled products meet the requirement through the validity of the licence. Nordic Ecolabelling acknowledges the challenges associated with new substances that are introduced in List II and III. We will evaluate the circumstances and possibly decide on a transition period from case to case.

The requirement concerns the main lists (List I-III) and not the corresponding sub lists called "Substances no longer on list". A substance which is transferred to a sub list is thus no longer excluded unless it also appears on any of the other main lists I-III. However, special attention is needed concerning those List II substances which are evaluated under e.g., the Cosmetics Regulation, which doesn't have provisions for identifying EDs. Since it's not within the scope of e.g., this regulation to identify EDs, it's not clear how the substances will be handled at [www.edlists.org](http://www.edlists.org) once the evaluation (safety assessment of the substances in cosmetics in this case) is finalised. Nordic Ecolabelling will evaluate the circumstances for substances on sub list II case-by-case, based on the background information indicated on the sub list.

By excluding both identified and prioritised potential EDs which are under evaluation, Nordic Ecolabelling ensures a restrictive policy on endocrine disruptors.

### **Flame retardants**

Flame retardants come in several different types. For example, brominated flame retardants, chlorinated or phosphorous flame retardants. Flame retardants are suspected of contributing to a number of unwanted health effects. Several of the substances are suspected of causing birth defects, cancer, and endocrine disrupting effects. The flame retardants HBCDD, short chain chloro-paraffins, TCEP, boric acid (and certain salts thereof), boron oxide and certain borax compounds (sodium tetraborate decahydrate and sodium tetraborate pentahydrate) are on the EU candidate list under REACH.

Many brominated flame retardants (BFR) are persistent and bio accumulative chemicals that can now be found dispersed in nature. Polybrominated diphenylethers (PBDE) are one of the most common groups of BFR and they have been used as flame retardants on a wide range of materials, including textiles. There are, for instance, examples of hexabromocyclododecane (HBCDD) and tetrabromobisphenol A (TBBPA) being used on fabrics for cars. Other relevant textiles that may have been treated with flame retardants include bed linen in the healthcare sector (hospitals, care homes and nursing homes) and

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<sup>113</sup> Miljøstatus i Norge (2008): Hormonforstyrrende Stoffer.  
<http://www.miljostatus.no/Tema/Kjemikalier/Noen-farlige-kjemikalier/Hormonforstyrrende-stoffer/#D>  
(dated 26.02.2009)

workwear<sup>114</sup>. The focus on phasing out brominated flame retardants has led to the use of alternatives such as phosphorus and nitrogen-based flame retardants.

### **Per- and polyfluoroalkyl substances (PFAs), e.g. , PFOA and PFOS**

Fluorosurfactants and other per- and polyfluoroalkyl substances (PFASs) constitute a group of substances that have harmful properties. Certain per- and polyfluorinated compounds can degrade to the very stable PFOS (perfluorooctane sulphonate) and PFOA (perfluorooctanoic acid) and similar substances. These substances are extremely persistent and are easily absorbed by the body<sup>115</sup>. The substances are found all over the globe, from the large oceans to the Arctic. PFOS have also been found in birds and fish and in their eggs. The substances in this group impact on the biological processes of the body and are suspected to be endocrine disruptors, carcinogenic and to have a negative impact on the human immune system<sup>116</sup>. PFOA, APFO (ammonium pentadecene fluoro octanoate) and certain fluoride acids are on the Candidate List due to their reprotoxicity, as well as PBT. There are new research results showing that shorter chains (2-6 carbon atoms) have been discovered in nature<sup>117</sup>.

### **Chlorinated compounds such as PVC**

PVC (polyvinylchloride) may contain hazardous phthalates and since they are not chemically bonded to the plastic, they can leak out of the products<sup>118</sup>. In addition, soft PVC coating on the textile is not desirable in the waste stage, where it can be problematic either in incineration facilities or when the textile fibre is recycled.

### **Nanoparticles**

Nanoparticles are not desirable in ecolabelled products. These include nanometals such as nano silver, nanogold and nano copper. Nanometals such as nano silver and nano copper are a particular problem as they are present in many products for their antibacterial effect. See more information in the background text to the requirement “Biocides and antibacterial substances”.

The criteria specify that polymer emulsions are not considered to be nanomaterial and set out exemptions from the requirement. A nanomaterial is a natural, incidental, or purposely manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for at least 50% of the particles in the number size distribution, one or more external dimensions is in the size range 1-100 nm\*.

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<sup>114</sup> Survey, health, and environmental assessment of flame retardants in textiles, Danish Environmental Protection Agency, 2014

<sup>115</sup> Borg, D., Tissue Distribution Studies And Risk Assessment Of Perfluoroalkylated And Polyfluoroalkylated Substances (PFASS), Doctoral Thesis, Institute Of Environmental Medicine (IMM) Karolinska Institute, Stockholm, Sweden 2013

[http://publications.ki.se/xmlui/bitstream/handle/10616/41507/Thesis\\_Daniel\\_Borg.pdf?sequence=1](http://publications.ki.se/xmlui/bitstream/handle/10616/41507/Thesis_Daniel_Borg.pdf?sequence=1)

<sup>116</sup> E.g., Heilmann, C. et al, Persistente fluorbindelser reducerer immunfunktionen, Ugeskr Læger 177/7, 30.3.2015 OSPAR 2005: Hazardous Substances Series, Perfluorooctane Sulphonate (PFOS), OSPAR Commission, 2005 (2006 Update), MST, 2005b: Miljøprojekt nr. 1013, 2005, More Environmentally Friendly Alternatives to PFOS-compounds and PFOA, Danish Environmental Protection Agency, 2005.

<sup>117</sup> Perkola, Noora, Fate of artificial sweeteners and perfluoroalkyl acids in aquatic environment, Doctoral dissertation Department of Environmental Sciences, Faculty of Biological and Environmental Sciences, University of Helsinki, Finland 12.12.2014,

<https://helda.helsinki.fi/bitstream/handle/10138/136494/fateofar.pdf?sequence=1>

<sup>118</sup> Miljøstatus i Norge: <http://www.miljostatus.no/no/Tema/Kjemikalier/Noen-farlige-kjemikalier/Ftalater/> (accessed 04.12. 2011).

It should be noted that Nordic Ecolabelling does not require a test for all raw materials in terms of nanoparticles. The requirement needs a declaration from the raw material supplier for raw materials that are not covered by the exemption. The declaration must state that the raw material does not contain nanomaterial, as defined in the requirement.

### **Heavy metals**

The requirement covers all chemicals in the textile production and prohibits the use of the following heavy metals: antimony, arsenic, cadmium, chromium, lead, mercury, zinc, copper, nickel, tin, barium, cobalt, iron, manganese, selenium, and silver.

Heavy metals such as cadmium, lead and mercury may be found as impurities in certain dyes and pigments used for textiles. These metals can accumulate in the body over time and are highly toxic with irreversible effects, including damage to the nervous system (lead and mercury) or kidneys (cadmium). Cadmium is also known to cause cancer. Cadmium is classified as carcinogenic, mutagenic, reprotoxic, toxic and toxic for aquatic organisms. Chromium is allergenic, carcinogenic, and toxic for aquatic organisms. The use of cadmium, mercury and lead has become very limited in textiles, but controlling for them remains relevant<sup>119</sup>.

### **Azo dyes**

The requirement has been moved to this requirement containing the prohibition list in this generation of the criteria. Aromatic amines released by azo dyes may be carcinogenic, allergenic, irritating, and toxic.

In relation to the previous version of the criteria, the requirement has been extended to include 12 substances described in the report "Toxics in Carpets in the European Union". These 12 aromatic amines have been identified as degradation products from azo dyes used in carpets and are also considered to be relevant for textiles. All the carcinogenic aromatic amines covered by the Nordic Ecolabel requirement are listed in appendix 2. The 12 new substances in this criteria version are listed at the bottom.

Some of the substances in appendix 2 are excluded through REACH (Regulation No. 1907/2006) Annex XVII No 43 if they are included in quantities exceeding 30 mg/kg.

Note that Nordic Ecolabelling's requirements go further than REACH, by entirely prohibiting the use of azo dyes that may release any of the carcinogenic aromatic amines.

### **Phthalates**

The requirement excludes the presence of phthalates on the Candidate List and other phthalates. A number of phthalates, including the phthalates on the Candidate List in REACH, are considered problematic. The phthalates on the Candidate List, for example, interfere with reproduction and are classified as reprotoxic. When the phthalates are used as softeners in plastic products, the

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<sup>119</sup> Investigation of chemical substances in consumer products, Danish Environmental Protection Agency 2011.

phthalates are not bound in the material, and so will slowly be released during use of the product<sup>120</sup>. Phthalates are often used as a softener in polyvinyl chloride (PVC). In the textile industry, they are used in the print on textiles, waterproof fabrics, artificial leather, rubber, as a softener in PVC, and in some dyes.

### **Chlorinated solvents, including chlorophenols and chlorobenzenes**

Chlorinated solvents – such as trichloroethane (TCE) – are used by textile producers to dissolve other substances during manufacture and to clean textiles. TCE is an ozone depleting substance that is persistent in the environment. It is also known to affect the central nervous system, liver, and kidneys. Since 2008, the EU has severely restricted the use of TCE. Chlorinated carriers may be used for the colouring of synthetic fibre and fabric or blends of polyester and wool.

**Chlorobenzenes** are persistent and bio accumulative chemicals that have been used as solvents and biocides in the production of dyes and as auxiliary chemicals. The effect of exposure depends on the type of chlorobenzene; however, they tend to affect the liver, thyroid, and central nervous system. Hexachlorobenzene (HCB) is the most toxic and persistent chemical in this group, as well as being an endocrine disruptor.

### **Chlorophenols**

Chlorophenols are a group of substances that are often used as biocides in a wide range of products. Pentachlorophenol (PCP) and its derivatives are, for example, used as biocides in the textile industry. PCP is highly toxic to humans and can affect the body's organs. It is also highly toxic for aquatic organisms. The EU prohibited the manufacture of products that contained PCP in 1991 and now also severely restricts the sale and use of all goods that contain the chemical.

Imported products containing PCP are the most significant remaining sources of potential PCP emissions and exposure. It may, for example, be present in leather and textiles to protect against mould. Chlorophenols may also be present as impurities from the raw materials used in the production of dyes. Furthermore, PCP and tetrachlorophenol (TeCP) may be used as preservatives in printing paste for textiles<sup>121</sup>.

### **Alkylphenols ethoxylates and other alkylphenol derivatives**

Alkylphenol ethoxylates (APEO) and/or alkylphenol derivatives (APD) are a group of non-readily degradable surfactants that are proven endocrine disruptors. The alkylphenol compounds most often used in textiles are nonylphenols (NP) and octylphenols and their ethoxylates, particularly nonylphenol ethoxylates. The textile industry uses NPs in its washing and dyeing processes. They are toxic for aquatic organisms, persistent in the environment and can accumulate in body tissue and be biomagnified (increase in concentration

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<sup>120</sup> Guidance to businesses on phthalates, Danish Environmental Protection Agency 2013.

<sup>121</sup> Roadmap to zero

<https://www.roadmaptozero.com/fileadmin/layout/media/downloads/en/Chlorophenols.pdf> accessed 02.08.2019.

through the food chain). Their similarity to natural oestrogen hormones can disrupt the sexual development of some organisms<sup>122</sup>.

### **Organotin compounds**

Organotin compounds are used in biocides and as fungicides in a wide range of consumer products. In the textile industry, they can be found in products such as socks, shoes, and sportswear to prevent odours caused by the breakdown of perspiration. One of the most common organotin compounds is tributyltin (TBT). Several of the tin-organic compounds are banned for selected areas of use through Reach Annex XVII entry 20 and the following three; TBTO, DBTC and DOTE are on the EU Candidate List<sup>123</sup>.

### **Linear alkylbenzene sulphonates (LAS)**

LAS is an active ingredient in detergents and cleaning agents that may be used in washing processes during textile production. LAS is, as a tenside, highly toxic and can be absolutely lethal to aquatic organisms such as fish, crustaceans and algae. The toxic effect is due to surfactants dissolving fat and proteins and thus also the living organism's cells and their cell membranes. In addition, LAS is not degraded anaerobically and will thus end up in the sludge in treatment plants where the substance is potentially harmful due to its toxicity to aquatic organisms. Therefore, LAS is excluded.

### **Quaternary ammonium compounds such as DTDMAC, DSDMAC and DHTDMAC**

The cationic detergents distearyl dimethyl ammonium chloride (DSDMAC), dihydrogenated tallow alkyl dimethyl ammonium chloride (DTDMAC) and dihydrogenated tallow dimethyl ammonium chloride (DHTDMAC) are substances with toxic and persistent properties.

Their emissions to water have been significantly reduced in recent times. Concern remains, however, over their use in softeners, through which they can reach surface water via direct discharges, sewerage systems or wastewater treatment plants. These three surfactants have been phased out in many countries, in line with the PARCOM Recommendation 93/4 on the Phasing Out of Cationic Detergents DTDMAC, DSDMAC and DHTDMAC in Fabric Softeners. Since they might possibly still be used in some countries, their exclusion remains relevant<sup>124</sup>.

### **EDTA**

EDTA (ethylenediaminetetraacetic acid) and its salts are not readily degradable and the EU's risk assessment states that under the conditions at municipal water treatment plants EDTA is either not broken down or only breaks down to a slight degree (CEFIC, 2009). Today there are more environmentally aware alternatives that are degradable and able to replace EDTA in chemical products. These include MGDA (methylglycinediacetic acid). EU is also actively working to

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<sup>122</sup> Eleven hazardous chemicals which should be eliminated, <https://www.greenpeace.org/archive-international/en/campaigns/detox/fashion/about/eleven-flagship-hazardous-chemicals/> accessed 02.08.2019.

<sup>123</sup> <https://miljostatus.miljodirektoratet.no/tema/miljogifter/prioriterte-miljogifter/tbt-og-andre-organiske-tinnforbindelser/> besøgt 8 august 2019.

<sup>124</sup> JRC Technical Reports: Revision of the European Ecolabel and Green Public Procurement (GPP) Criteria for Textile Products 2013.

limit EDTA in the paper industry (Official Journal of the European Union, 2006/C 90/04). EDTA is used as a complexing agent in the production of many chemical products for technical use.

## 5.8.2 Specific chemical requirements

### O36 Biocides and antibacterial substances

The following substances, which may have a biocidal and/or antibacterial effect in fibre, fabric, or the finished textile, are not permitted:

- Antibacterial substances (incl. silver ions, nano silver, and nano copper), and/or
- Biocides in the form of pure active ingredients or as biocidal products.

*Naturally occurring antibacterial effects in materials are not subject to the prohibition.*

- Declaration from the textile manufacturer that the requirement has been fulfilled.

### Background to the requirement

Biocidal products and antibacterial products are not desirable in Nordic Swan Ecolabelled products and the requirement excludes both chemical and physical treatments. Frequent use of antibacterial substances in ordinary consumer products may contribute to increased resistance in bacteria and the eradication of necessary bacteria, and Nordic Ecolabelling does not wish to contribute to this. Tests carried out by Swedish water company Svensk Vatten on sportswear treated with nano silver show that, after 10 machine washes, 31-90% of the nano silver had been washed out of the textile. Nano silver is harmful for the aquatic environment<sup>125</sup>. These substances are increasingly being added to consumer products – everything from textiles to kitchen equipment. One of the substances often being added is nano silver. Particular attention is being paid to nanometals such as nano silver and nano copper since they occur in many products.

These nanomaterials are added to achieve an antibacterial effect. There has been particular concern that emissions of nano silver into wastewater and other dispersal could eliminate desirable bacteria and cause resistance in bacteria. Another example of antibacterial substances that must not be used are organotin compounds and chlorophenols, which are used, for example, during the transport and storage of textiles.

Preservatives used in chemical raw materials (“in can” preservatives), for example in adhesives or surface treatments, are not subject to this prohibition. Here, the purpose of the biocide is to preserve the chemical product during storage. Naturally occurring antibacterial effects in materials (for example bamboo) are also not subject to the prohibition.

The requirement is a combination of requirements O27 and O67 from the previous generation of the criteria. For communication purposes, requirement O35 also specifies that organotin compounds are not permitted, since they are

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<sup>125</sup> Silverläckan, En rapport om silver i sportkläder 2018, Svenskt Vatten  
<file:///C:/Users/hbb/Downloads/Silverrapport%20Svenskt%20Vatten%2020181022C.pdf>

one of the 11 substance groups highlighted by Greenpeace in its “Detox My Fashion” campaign from 2011.

### O37 Metal complex dyes and pigments

Only metal complex dyes and pigments based on copper that make up a maximum of 5% by weight may be used, and only for the following fibres and processes:

- when dyeing wool fibre
- when dyeing polyamide fibre
- when dyeing a blend of wool and/or polyamide with regenerated cellulose fibre

☒ Technical datasheets or test reports showing fulfilments of the requirement.

### Background to the requirement

The requirement has been tightened since the previous generation of the criteria. It is no longer possible to use metal complex dyes for cotton textiles, as it is possible to substitute metal complex dyes when dyeing cotton. Metal complex dyes are used in connection with the dyeing of wool, silk, cotton, and polyamide, for example. Metal complex dyes are problematic because they contain undesirable heavy metals. The requirement prohibits the use of metal complex dyes and pigments containing, for example, chromium, cobalt, and nickel. It also restricts the scope to use copper, which occurs widely in metal complex dyes. Copper should be avoided in the aquatic environment, but it is not harmful to health unless ingested. Because of its high fixation ratio and colour fastness, copper in metal complex dyes is acceptable in small quantities (max. 5 weight% in the dye) for certain fibre types.

In general terms, metal complex dyes have a high fixation ratio (85-98%) and good fade resistance. The good fade resistance may help to give the textile a long life<sup>126</sup>. With wool/polyamide blends, it can be difficult to achieve the desired clarity and colour fastness for certain colours without the use of metal complex dyes.

Parts of the industry state that it is possible to phase out metal complex dyes even for the dark colours and still produce textiles of good quality that the market wants. Other businesses believe that the restrictions being introduced make it more difficult for them to produce all the types of goods that the market demands. It is, however, worth considering whether customers would demand these colours, if they knew that there were less environmentally harmful alternatives.

### O38 Degradability of detergents, softeners, and complexing agents

Chemical products that are used as detergents, softeners and complexing agents shall be either readily aerobically biodegradable or inherently aerobically biodegradable, in accordance with test methods OECD 301 A-F, OECD 310, OECD 302 A-C or equivalent test methods.

Softeners and complexing agents referred to as “chelating agents” and “sequestering agents” are also covered by the requirement.

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<sup>126</sup> Brancheorientering for tekstilfarvning og –tryk, Orientering fra Miljøstyrelsen Nr. 7 2010.



- The chemical manufacturer must submit safety data sheets or test reports showing fulfilment of the requirement.

### Background to the requirement

Detergents, softeners, and complexing agents are used in large quantities in the wet processes of textile production. It is therefore relevant to set a requirement that these chemicals must be readily degradable or inherently degradable, in order to reduce the environmental impact of these chemicals. The requirement has been reworded and tightened since the previous generation of the criteria. The wording now specifically states that the requirement applies to all chemicals used for their function as a detergent, softener, or complexing agent. Chelating agents and sequestering agents are synonymous with complexing agents and are therefore also covered by the requirement.

The requirement has been tightened such that the chemicals can no longer be “eliminable in the wastewater treatment plant”, as this could lead to sludge used for soil improvement containing undesirable chemicals. The requirement is no longer identical to the corresponding requirement for the EU-Ecolabel.

### O39 Sizing agents

This requirement only applies to weaving processes.

At least one of the alternatives below shall be fulfilled and documented:

1. Sizing agents must be either readily aerobically biodegradable or inherently aerobically biodegradable, in accordance with test methods OECD 301 A-F, OECD 310, OECD 302 A-C or equivalent test methods or
2. Over 80 weight% of the sizing agents used must be recovered from the wastewater.

- Alternative 1: Safety data sheet for sizing agents used, showing fulfilment of the requirement.
- Alternative 2: Declaration from the weaving unit that the requirement is fulfilled, plus brief description of the recovery process at the weaving unit.

### Background to the requirement

This requirement only applies to weaving units. Sizing agents are added to protect the yarn during the weaving process. This results in greater abrasion resistance and prevents wear of the yarn during weaving. The requirement is a reworking of the requirement from the previous generation of the criteria.

It is now clear that the requirement also permits recovery of sizing agents as an alternative. Recovering chemicals can save on resources and energy, and thus make a positive contribution to a circular economy.

### O40 Bleaching agents

Chlorinated substances shall not be used as bleaching agents. The requirement applies to all types of textile processes, including bleaching of fibres, yarn, fabric and the finished textile.

- Declaration from the producer of the fibres, yarn, fabric and finished textile that the requirement is fulfilled.

### Background to the requirement

The requirement is identical to the requirement from the previous generation of the criteria. However, in this generation of the criteria, the requirement has been

split up, so that the prohibition of chlorine treatment of the wool fibre is found in requirement O31.

Chlorinated bleaching agents are environmentally hazardous and are therefore not permitted. The use of chlorinated bleaching agents has been reduced in the industry and alternatives are available, such as hydrogen peroxide (H<sub>2</sub>O<sub>2</sub>)<sup>127</sup>. Requirement O24 sets out provisions concerning bleaching agents for regenerated cellulose fibre.

#### O41 Chemicals that contain silicone

D4 (CAS no. 556-67-2), D5 (CAS no. 541-02-6) and D6 (CAS no. 540-97-6) shall only be present in the form of residues from the raw material production, and each shall only be present in amounts up to 1000 ppm in the silicone raw material (the chemical).

- Test from the chemical manufacturer showing that the requirement is met.

#### Background to the requirement

Siloxanes D4, D5 and D6 are included on the Candidate List of Substances of Very High Concern in REACH, and so these substances are prohibited through requirement O35. However, a specific requirement has been included for these siloxanes to make it clear that documentation is required to confirm that the content is below the stated limit value in any silicone used. This is considered relevant because much of the textile production takes place in countries that are not covered by REACH.

It is possible to find chemicals containing silicone in use throughout the production chain, for example as softeners. The requirement has thus been reworded since the previous generation of the criteria because it used to only cover finishing, membranes, and laminates.

#### O42 VOC in printing paste

Printing paste may not contain more than 5% VOC (volatile organic compounds with a steam pressure exceeding 0.01kPa at 20°C).

- Declaration from the producer or supplier of the printing paste that the requirement is fulfilled.

#### Background to the requirement

Volatile organic compounds are undesirable, because they tend to be harmful to health, poorly degradable in an aquatic environment and have a negative impact on the ozone layer. Printing paste often contains volatile organic compounds, which is why there are requirements limiting the use of such substances.

The requirement remains unchanged from the previous generation of the criteria. The documentation requirement has been updated, to make it clear that the supplier or producer of the printing paste must declare fulfilment of the requirement.

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<sup>127</sup> The EU Ecolabel's background document, 2007.

## 5.9 Coatings, laminates, and membranes

### O43 Textiles as substrate (e.g., in laminates)

Textiles used as substrate/carrier material in coatings, laminates and membranes shall fulfil the requirements for the respective fibres in section 5.7.

*See the definition of coatings, laminates, and membranes in section 5.2 Definitions.*

- Documentation as described in the relevant fibre requirement.

### Background to the requirement

Textiles used as carrier materials/substrates for lamination or onto which a coating or membrane is applied must meet the same requirements as other fabrics that are used in Nordic Swan Ecolabelled textiles. The requirement is new and has been inserted to show that both fibre requirements and chemical requirements (if relevant) apply to fabrics used in conjunction with coatings, laminates, and membranes for textiles.

### O44 Raw material in the polymer

The requirement covers polymers used for coatings, laminates and membranes of textiles which constitute more than 5% by weight of the finished fabric.

The polymer must comply with the requirements set out in either Part A or Part B:

#### Part A Recycled material:

Synthetic fibre of fossil origin must comprise 100% recycled material (see definition in section 5.2). This must not include recycled plastic from plants that are EFSA\* or FDA\*\* approved as food contact material or marketed as compatible with these.

The polymer or finished fabric must at the same time comply with requirement O30 for testing for harmful substances.

The traceability of the recycled raw material must be documented with either a) or b) below:

- a) Global Recycled Standard certificate or Recycled Claim Standard certificate showing that the raw material is recycled, or other equivalent certification approved by Nordic Ecolabelling.
- b) By stating the producer of the recycled raw material and documenting that the feedstock used in the raw material is 100% recycled material, see definition in requirement.

*\* In line with Commission Regulation (EC) No 282/2008 of 27 March 2008 on recycled plastic materials and articles intended to come into contact with foods.*

*\*\* In line with the Code of Federal Regulations Title 21: Food and Drugs, PART 177 – INDIRECT FOOD ADDITIVES: POLYMERS.*

#### Part B Biobased raw material:

Used raw materials must contain at least 90% bio-based raw material, documented by testing in accordance with ISO 16620, ASTM D6866 or equivalent standard.

Raw materials used in the production of bio-based polymer fibres (e.g., polyester and polyamide) must meet the following requirements.

## **Palm oil and soybean oil**

Palm oil and soybean oil and soy flour must not be used for bio-based polymer fibre in the textile.

### **Specific conditions for sugar cane**

The raw materials must meet either a) or b):

- a) Waste\* or residual products\*\* defined in accordance with (EU) Renewable Energy Directive 2018/2001. There must be traceability back to the production / process where the residual production occurred.
- b) Sugar cane must not be genetically modified\*\*\* and must be certified to a standard that meets the requirements described in appendix 3.

The producer of the bio-based polymer must have a chain of custody (CoC) certification according to the standard by which the raw material is certified. Traceability must at least be ensured by mass balance. Book and claim systems are not accepted.

The producer of the bio-based polymer must document its purchase of certified raw materials for polymer production, for example in the form of specifications on an invoice or delivery note.

### **Other raw materials**

The name (in Latin and a Nordic or English) and supplier of the raw materials used must be stated.

The raw materials must meet either c) or d):

- c) Waste\* or residual products\*\* defined in accordance with (EU) Renewable Energy Directive 2018/2001. There must be traceability back to the production / process where the residual production occurred.
- d) Primary raw materials (e.g., corn), not genetically modified\*\*\*. Here geographical origin (country/state) must be stated.

\* *Waste as defined by EU Directive 2018/2001/EC.*

\*\* *Residual products as defined by EU Directive 2018/2001/EC. Residues come from agriculture, aquaculture, fisheries, and forestry, or they can be processing residues. A processing residual product is a substance that is not one of the end products that the production process directly strives for. Residues must not be a direct target of the process and the process must not be changed to intentional production of the residual product. Examples of residual products are e.g., straw, husks, pods, the non-edible part of maize, manure, and bagasse. Examples of processing residues are e.g., raw glycerine or brown lye from paper production. Palm Fatty Acid Distillate (PFAD) from palm oil is not considered a residual/waste product and can therefore not be used.*

### **Part A:**

- Declaration from the producer of the recycled raw material that the raw material is not EFSA or FDA approved, see requirement.
- a) Certificate from an independent certifier of the supply chain (e.g., Global Recycled Standard or Recycled Claim Standard).
- b) Documentation from the producer, showing that the feedstock used in the raw material is 100% recycled material, see definition in requirement

### **Part B:**

- Test according to ISO 16620, ASTM D6866 or equivalent standard showing content of bio-based raw material.
- Declaration by the producer of the polymer, that palm oil (incl. PFAD (Palm Fatty Acid Distillate)) soybean oil and soy flour are not used as raw materials for the bio-based polymer.

- ☒ For waste and residual products: Documentation from the polymer producer which shows that the requirement's definition of waste or residual products is met, as well as traceability which shows where the waste or residual product comes from.
- ☒ Sugar cane: Indicate which certification system sugar cane is certified for. A copy of a valid CoC certificate or a certificate number. Documentation such as an invoice or delivery note from the producer of the bio-based polymer, showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer. Declaration stating that the sugar cane has not been genetically modified.
- ☒ For primary raw materials: Declaration by the producer of the polymer stating that raw materials have not been genetically modified according to the definition in the requirement. Name (in Latin and English) and geographical origin (country/state) of the primary raw materials used.

### Background to the requirement

For part A see background to requirement O28. For part B see background to requirement O29.

### O45 Chemicals in impregnation, coatings, laminates, and membranes

Halogenated polymers are prohibited (e.g., PVC (polyvinylchloride) in impregnation, coatings, laminates and membranes

Additives in polymers used in impregnation, coatings, laminates, and membranes must meet the following requirements (e.g., added in master batch):

- O33 Classification of chemical products,
  - O34 Classification of ingoing substances,
  - O35 Prohibited substances
  - O37 Metal complex dyes and pigments.
- ☒ Declaration from the producer of impregnation, coatings, laminates, and membranes that halogenated polymers are not used.
  - ☒ Declaration from the producer of impregnation, coatings, laminates, and membranes as described in requirement O33, O34, O35 and O37.

### Background to the requirement

The requirement remains unchanged from generation 4 of the criteria. The requirement Coatings, laminates and membranes coated with or based on per- and polyfluorinated compounds, for example, are not permitted. These substances are excluded from use in requirement O35 Prohibited substances.

Fluorinated polymers are widely used as coatings, laminates and in membranes, to achieve a product with breathable properties, while also being water resistant, for example in outdoor wear.

Fluorinated polymers such as perfluoroalkyl substances are highly persistent (stable) and non-degradable. The compounds are not soluble in water and fat and accumulates particles or tissue. They are bound to proteins and can be found with a high content in top predators. In a Nordic screening survey, PFAS compounds were found in all the sample types investigated, and the highest level was found in marine mammals. The report concluded that PFAS are found in significant concentrations in the Nordic environment. The greatest focus is on the

PFAS compound perfluorooctane sulphonate (PFOS), which is toxic for aquatic organisms, birds, and bees.<sup>128</sup>

The greatest emissions of organic fluorinated substances occur during production of the clothing, but the substances are also dispersed into nature through use, washing and finally disposal of the clothing. There are alternatives to organic fluorinated substances, for both membranes and surface treatment. The 2015 report “Alternatives to perfluoroalkyl and polyfluoroalkyl substances (PFAS) in textiles” from the Danish Environmental Protection Agency names paraffin oils and wax, silicone, polyurethane, and dendrimer-based substances as non-fluorinated alternatives for the surface treatment of textiles. Fluorinated membranes may be made from either polyester (see e.g. [https://www.klattermusen.com/en/fabrics/190\\_cutan/](https://www.klattermusen.com/en/fabrics/190_cutan/)), a blend of polyester and polyethylene (see e.g. <https://en.wikipedia.org/wiki/SympaTex>) or from polyurethane (see e.g. <https://www.hellyhansen.com/about-us/manufacturing/>).

In its report “Chemistry for any weather” from 2012, Greenpeace concludes that it is possible to produce wind- and waterproof outdoor clothing without using organic fluorinated substances. They refer to a study conducted by the Berlin University of Applied Science (HTW)<sup>129</sup>, where three fluorine-free coatings and a fluorine-free membrane were tested in the laboratory and compared with the properties of conventional fluorinated products. The tests examined properties such as water repellency, oil repellency, waterproofing, wind proofing, breathability, and abrasion resistance. The results showed that the properties of the fluorine-free alternatives matched those of the fluorinated products in the areas that are of most importance to the ordinary consumer, namely wind- and waterproofing, breathability and abrasion resistance. Oil repellency was the only property for which the fluorinated products achieved better results than the fluorine-free alternatives.

## 5.10 Specific chemical requirement for adhesives

### O46 Adhesives

The requirement covers adhesives used to glue textiles, coatings, membranes, laminates, or other materials.

Adhesive used for small info labels such as care labels is not covered by the requirement.

The adhesive

- must not have any added colophony resin, and
- must meet requirements O33 Classification of chemical products, O34 Prohibition of CMR substances and O35 Prohibited substances.

Exemption applies to:

The classifications H317, H334 and H351 for hot-melt polyurethane adhesive containing methylene diphenyl diisocyanate (MDI), to be used for water-proof bed sheets. Automatic dosing must be used for application of adhesive. If manual filling of automatic dosing systems is used, the manual handling must be carried out using the correct personal protective equipment in accordance

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<sup>128</sup> Norwegian Pollution Control Authority (2005) Monitoring of air and precipitation transported over long distances.

<sup>129</sup> Marijke Schöttmer, Master's thesis: Investigation of Alternatives to Fluorocarbon Finishes for Textiles.

with the safety data sheet (SDS) and/or using technical measures such as local extraction/ventilation.

- ☒ Safety data sheet and declaration from the chemical manufacturer that the requirement is fulfilled.
- ☒ If exemption is used: Declaration from the manufacturer of water-proof bed sheets that automatic dosing is used for application of adhesive. If manual filling of automatic dosing systems is used, description of personal protective equipment and/or technical measures and in addition declare that this is according to SDS and local law.

### Background to the requirement

The requirement has been tightened compared with generation 4. The area of use is clarified and there is a specification that requirements O33 Classification of chemical products, O34 Prohibition of CMR substances and O35 Prohibited substances apply to all adhesives, with the exception of adhesive used for small info labels.

Polyurethane (PUR) hot-melt adhesive is used to glue one sheet of cotton to one sheet of polyurethane (laminated) to make water-proof bed sheets. Isocyanate (methylene diphenyl diisocyanate, MDI) is a necessary component in the production of the PUR adhesive. MDI is classified with H317 and H334 (allergic reactions) and H351 (suspected of causing cancer). The isocyanate makes cross-linking of isocyanates at the ends of the polyurethane polymer possible after the adhesive is applied. This cross-linking makes the adhesive harden so it cannot melt again. Once it has cross-linked after the adhesive process, the glue becomes solid, and it does not release particles during use. However, there is a health risk for the employees at the adhesive process during the manufacturing of the sheets. Therefore, employees must be protected during the application of the adhesive and automatic dosing system must be used.

## 5.11 Discharges from wet processes

### 047 COD, temperature, and pH in wastewater from wet processes

Discharges of COD (chemical oxygen demand) in wastewater from wet processes which is discharged to surface water after treatment shall not exceed 150 mg/L. Wastewater that is sent to municipal or other regional treatment plants is exempted.

Test method: COD content shall be tested in accordance with ISO 6060 or equivalent.

The pH value of the wastewater released to the surface water shall be between 6 and 9 (unless the pH value in the recipient lies outside this interval).

The temperature of the wastewater released to the surface water shall be lower than 40°C (unless the temperature in the recipient is higher).

A test report shall be submitted with the application. Thereafter, the applicant must have a procedure in place for annual testing in line with the requirement and for ensuring compliance with the requirement. Nordic Ecolabelling must be informed if the requirement is not fulfilled.

- ☒ Report submitted with application, showing average monthly calculations of COD, pH and temperature for at least three of the past 12 months. (For COD, measurement of PCOD, TOC or BOD may be used if a correlation to COD is evident).



- ☒ Description of how the wastewater from the wet process is treated and if the wastewater is sent to municipal or other regional treatment.
- ☒ A written procedure showing how an annual test is performed in line with the requirement, along with in-house checks of compliance with the requirement.

### Background to the requirement

The requirement has been changed from generation 4 of the criteria. In this generation COD must be measured in relation to water consumption and not in relation to the amount of textile produced. The requirement level for COD is set on the basis of the various government requirements in Asia, which are between 150 and 250 mg/L. Blaue Engel (version 1.4, 2017) has a corresponding limit of 160 mg/L, while ZDHC Guidelines (version 1.1, July 2019) have 150 mg/L as the “Foundational limit”.

Measurement of PCOD, TOC or BOD can also be used if a correlation to COD is shown. Alternative test methods for ISO 6060 are, for example, GB/T 11914 (China), US EPA 410.4 and APHA 5220D.

High levels of COD in the wastewater can lead to oxygen depletion of the aquatic environment and thereby harmful effects on flora and fauna.

There is also a requirement that the temperature of the wastewater shall be lower than 40°C (unless the recipient’s temperature is higher) and that the pH shall be between 6 and 9 (unless the recipient’s value lies outside this interval).

It has been specified that the calculations must have been completed in at least 3 of the last 12 months, and a requirement has been set for a routine for annual self-inspection of the requirement. Examples of alternative test methods for ISO 6060: GB / T 11914 (China), US EPA 410.4 and APHA 5220D.

## 5.12 Energy and water consumption

### O48 Implementation of BAT for energy and water consumption

The applicant shall demonstrate that the energy used for e.g., washing, drying, bleaching, and curing associated with dyeing, printing and finishing the textile is measured and compared with BAT levels or own figures from before implementing efficiency techniques.

This shall be done as a part of an energy management system or a system for the management of CO<sub>2</sub> emissions. The requirement may be documented per process.

The applicant shall demonstrate that the water consumption associated with wet processes such as dyeing, printing, and finishing the textile is measured

There shall also be documentation for that the production facilities have implemented a minimum of BAT water and energy efficiency techniques or measures for in-house production of solar energy, see the table and the extra information about BAT themes below. This applies to the total production volume for the individual production facility.

BAT themes	Production volume	
	<10 tonnes per day	>10 tonnes per day
1. General energy management	Two techniques	Three techniques
2. Washing and rinsing	One technique	Two techniques
3. Drying and curing using stretchers	One technique	Two techniques



<b>BAT themes</b>
<p><b>General techniques</b></p> <ul style="list-style-type: none"> <li>• Measuring how much is consumed and where</li> <li>• Process monitoring and automatic control systems for flow control, filling volumes, temperatures, and timings</li> <li>• Insulating pipes, valves, and flanges</li> <li>• Frequency-controlled electric motors and pumps</li> <li>• Closed design of machines to reduce evaporation losses</li> <li>• Reuse of water and liquids in batch processes</li> <li>• Combining multiple wet treatments into one process</li> <li>• Heat recovery, e.g., from washing, steam condensate, exhaust air from processes, exhaust gases from combustion</li> <li>• Solar thermal panels, solar photovoltaic panels, or a heat recovery system for used hot water, installed within the operation, and generating energy amounting to 30% of what the process requires</li> </ul>
<p><b>Washing and rinsing</b></p> <ul style="list-style-type: none"> <li>• Using cooling water as process water</li> <li>• Replacing overflow tanks with drainage/inlet tanks</li> <li>• Using “intelligent” rinsing technologies with water flow control and counter flow</li> <li>• Installing a heat exchanger</li> </ul>
<p><b>Drying and curing using stretchers</b></p> <ul style="list-style-type: none"> <li>• Optimising air circulation</li> <li>• Insulating the premises</li> <li>• Installing effective burner systems</li> <li>• Installing heat recovery systems</li> </ul>

- ☒ The applicant must compile and submit reports from energy management systems for the individual dyeing, printing, and finishing facilities. ISO 50001 or equivalent systems for energy management or management of CO<sub>2</sub> emissions are accepted as documentation of the energy management system.
- ☒ The applicant must compile and submit measurements of water consumption for the individual dyeing, printing, and finishing facilities.
- ☒ The applicant must submit an overview of the dyeing, printing, and finishing facilities, stating the production volume per day for each process.
- ☒ For each implementation of a BAT technique or process using solar energy produced in-house, the applicant must submit images of the facility, technical descriptions of the individual technologies and assessments of the energy savings achieved, along with a statement of the process and operation in which the technology has been implemented.

### **Background to the requirement**

The requirement concerning energy and water consumption has been expanded to include a requirement on implementation of a minimum of BAT techniques to reduce energy and water consumption. It is assessed not possible to set an absolute requirement limit for energy and water consumption, since production of the individual fabrics can vary a great deal, depending on the function of the finished fabric. There is a requirement, instead, that the individual production facility must implement a minimum of BAT techniques for water and energy efficiency. BAT techniques are taken from the Reference Document on Best Available Techniques for the Textiles Industry, European Commission July 2003<sup>130</sup> and compared with the requirements for BAT techniques in the EU Ecolabel criteria for textile products from 2014.

<sup>130</sup> Reference Document on Best Available Techniques for the Textiles Industry, European Commission July 2003.

Here we have been looking into whether it would be possible to use a PEF (product environmental footprint) analysis or EPD (environmental product declaration) as a basis for a specific CO<sub>2</sub> or energy requirement.

However, it is considered very difficult to impose an absolute quantitative requirement for either energy consumption or CO<sub>2</sub> impact, which is relevant for all textiles in this product group. This product group includes many different textile products with different functions. An overall requirement (or differentiated for a few different subcategories) with a maximum benchmark value for either energy consumption or climate impact in the form of CO<sub>2</sub> equivalents would be directed towards specific fibre types and specific textile types. An overall requirement would not be relevant for all textile products in the product group.

### 5.13 Fillings, stuffing materials, and padding

The following requirements concern fillings, stuffing materials, and padding that individually account for more than 1 weight% of the total filling, stuffing material or padding in the final product.

#### O49 Fibres in filling and stuffing materials

Fillings, stuffing materials, and padding made from fibre must meet the following fibre requirements:

- Cotton fibre: requirement O14
- Flax (linen), ramie, sisal, hemp, jute and other bast fibres: requirement O16
- Wool fibre: requirements O18, O19 and O22
- Regenerated cellulose fibre: requirement O24
- Synthetic fibre: requirements O28
- Recycled fibres: O30
- All fibres: requirement O31

☒ Here the same documentation is required as stated in the requirements referred to.

#### **Background to the requirement**

The requirement has been set to ensure that the environmental impact from raw material production is also addressed for products where filling and stuffing materials are of great relative importance compared to the other materials in the product. Reference is made to the background texts for the individual fibre requirements. Any finishing or coating of the fibres must meet requirement O31.

#### O50 Feathers and down – ethical requirements

Use of feathers and down plucked from live birds is prohibited.

Forced feeding of birds is prohibited.

Recycled\* down and feathers are exempt from the requirement, but documentation for traceability shall be provided to confirm that the down and feathers are recycled.

\* *Recycled down and feathers are defined here as post-consumer recycled down and feathers in line with standard ISO 14021.*

☒ Responsible Down standard or a certificate from another standard that fulfils the requirement.

- ☒ Recycled down and feathers: Recycled Global Standard certificate. Alternatively, documentation from the supplier, confirming that the down/feathers are post-consumer recycled down or feathers.

### **Background to the requirement**

Geese are the main target of feather and down plucking from live birds, but the method may also be applied to other duck species. Plucking feathers from live geese for down production is prohibited within the EU, although down and feathers may be “harvested” during the moulting period. The European Food Safety Authority (EFSA) has investigated the issue and concluded that it is possible to pluck down and feathers from live geese without causing pain, as long as it takes place during the moulting period<sup>131</sup>. The problem is that this is not taken into consideration in commercial operations and there are cases where the law is not complied with in all EU member states. The recommendation from EFSA is that goose down and feathers should only be plucked during the moulting period, and that control systems should be created for this. No such control system is in place yet, however, and Nordic Ecolabelling has therefore set a requirement prohibiting the use of down and feathers plucked from live birds. Forced feeding is also not permitted.

Textile Exchange has published a certifiable standard for down and feathers – **the Responsible Down Standard (RDS)**. RDS ensures an independent third-party assessment of the key aspects of breeding and handling the animals and ensures traceability all the way back along the supplier chain. The purpose of the standard is to improve the welfare of the birds, and to provide greater reassurance to retailers and consumers with regard to the purchase of sustainable materials. The aim of the Responsible Down Standard is to ensure that down and feathers do not come from birds that have suffered unnecessary harm. The standard can be applied to both mixed and 100% certified products. However, the end-product can only be labelled as RDS-certified if the down or feathers in the product are 100% certified. The certification ensures, for example, that forced feeding is prohibited and that down and feathers are not plucked from live birds. It also ensures that the birds are not kept in cages and have space to express their natural behaviours. This includes the requirement that there must be nesting areas for female birds<sup>132</sup>. There is a long list of certified down and feather suppliers, which can be found here: <http://responsibledown.org/for-business/find-certified-companies/all-companies-certified-to-the-responsible-down-standard/>. These feathers and down are used in various products on the market, such as clothing, duvets, and other textile products with fillings.

### **O51 Feathers and down – microbial cleanliness**

Feathers and down must document microbial purity in accordance with the standard EN 12935 and comply with the following:

- oxygen index number of max. 10 in accordance with the standard EN 1162.
- fat content must lie within the range 0.5% to 2.0% in accordance with the standard EN 1163.

- ☒ Microbial cleanliness: Test report showing compliance with the requirement.

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<sup>131</sup> EFSA Scientific Opinion on the practice of harvesting (collecting) feathers from live geese for down production, 25 November 2010.

<sup>132</sup> <http://responsibledown.org/wp-content/uploads/2015/07/TE-Responsible-Down-Standard-2.0-opt.pdf> accessed 07.06.2016

## Background to the requirement

The standard EN 12935 “Feather and down – Hygiene and cleanliness requirements” sets requirements for the microbial cleanliness of feathers and down as a filling material. It gives the oxygen index number as an indicator of the material’s cleanliness. The standard states that an oxygen index number of less than 20 for the filling material is considered hygienically acceptable and so no further analysis of microbial activity in the material is necessary. The Nordic Swan Ecolabel criteria require an oxygen index number of max. 10, representing high microbial cleanliness. EN 12935 refers to EN 1162 “Feathers and down. Test methods – Determination of the oxygen index number” and EN 1163 Feather and down – Test methods – Determination of the oil and fat content.

### O52 Feather and down - Labelling of filling materials

Feather and down filling materials in duvets and pillows must be labelled in accordance with standard EN 12934 “Feather and down – Composition labelling of processed feathers and down for use as sole filling material”.

- Declaration that the labelling of the filling material complies with EN 12934.

## Background to the requirement

This requirement is new. Standard EN 12934 contains provisions on information about the composition of feather and down filling materials and sets out guidelines on the label on the finished goods.

### O53 Additives and treatments

Fillings, stuffing materials, and padding (except for fibres which have their own requirement O49) must not be added or treated\* with:

- Substances on the REACH Candidate List. Link to the REACH Candidate List: <http://echa.europa.eu/web/guest/candidate-list-table>
- PVC (polyvinylchloride)
- Organic chlorinated compounds
- Flame retardants (e.g., short chained chlorinated paraffins)
- Halogenated bleaching chemicals
- Aziridines and polyaziridines
- Carcinogenic, mutagenic and reprotoxic compounds (categories 1A, 1B and 2 in accordance with CLP Regulation 1272/2008)
- Phthalates
- Fluorinated organic compounds such as PFOA (perfluorooctanoic acid and its salts/esters), PFOS (perfluorooctane sulphonate and its compounds), and PTFE (polytetrafluoroethylene), etc.
- Organotin compounds
- Biocides or biocidal products intended to add a disinfecting or antibacterial effect in the product.

\* See the definition of impurities and ingoing substances in section 5.2 Definitions.

<sup>3</sup> Note that the requirement also prohibits the use of phthalates on the EU’s Candidate List.

- Declaration from the producer/supplier of the filling/stuffing material showing that the requirement is fulfilled.

- ☒ For natural fillings and stuffing materials such as down, feathers or ones with no chemical additives or treatments: Declaration from the producer/supplier that no chemical additives or treatments have been used.

### Background to the requirement

In this product group, filling and stuffing materials will often be in close contact with the user of the product, as the materials lies just below the textile. This makes it highly relevant to address potential exposure to hazardous chemicals from filling and stuffing materials. The background text for requirement O35 contains a background text for all substance groups on the list. The following provides more specific background for filling and stuffing materials.

**Fluorinated organic compounds** are used for e.g. impregnation of down and other filling materials.

**Chlorinated paraffins** may be used as flame retardants and as softeners, thus substitution of chlorinated paraffins will depend on the effect to be achieved.

**Organotin compounds:** Polyurethane foam (PU) may contain organotin compounds such as dibutyltin (DBT) and tributyltin (TBT) which can, for example, be applied as an antibacterial treatment<sup>133</sup>.

### Halogenated flame retardants

Halogenated organic compounds such as chlorinated paraffins or brominated compounds can, for example, be used as flame retardants in foam materials and polystyrene balls<sup>134</sup>.

The Danish Environmental Protection Agency has placed the flame retardant tris(2-chloro-1-methyl)phosphate (TCPP), which is mainly used in polyurethane foam (PU foam), on the LOUS list as a consequence of the Danish Environmental Protection Agency's self-classification (based on QSAR predictions) of the substance as Muta 2, H341 (Suspected of causing genetic effects) and Repr 2, H 361 (Suspected of damaging fertility or the unborn child). On the basis of analogies drawn with tris(2-chloroethyl)phosphate (TCEP), TCPP is also classified as Carc. 2; H451. Tris(1,3-dichlor-2-propyl)phosphate (TDCP) is mutagenic in vitro, but not in vivo, and is also classified as Carc 2, H451.<sup>135</sup>

Brominated flame retardants such as hexabromocyclododecane, CAS no. 25637-99-4, (HBCD) are used extensively, especially in Europe. HBCD may, for example, be used in extruded and expanded polystyrene foam.

Substances were found in polystyrene balls in two nursing pillows investigated in the Danish Environmental Protection Agency's analysis from 2008<sup>136</sup>.

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<sup>133</sup> Survey, emissions and health assessment of chemical substances in baby products, Danish Environmental Protection Agency, 2008.

<sup>134</sup> Survey, emissions and health assessment of chemical substances in baby products, Danish Environmental Protection Agency, 2008.

<sup>135</sup> Chemical substances in child car seats and other products with textile for children, Danish Environmental Protection Agency, 2015.

<sup>136</sup> Survey, emissions, and health assessment of chemical substances in baby products, Danish Environmental Protection Agency, 2008.

## O54 Emission requirements for foamed synthetic materials

For foamed synthetic materials such as PU foam, latex foam and expanded polystyrene, emissions of the following substances and substance groups shall not exceed the levels stated in the table below.

Emission of volatile organic compounds	
Substance or substance group	Requirement limit (mg/m <sup>3</sup> )
Formaldehyde (50-00-0)	0,1
Toluene (108-88-3)	0.1
Styrene (100-42-5)	0.005
Vinylcyclohexene (100-40-3)	0.002
4-Phenylcyclohexene (4994-16-5)	0.03
Vinyl chloride (75-01-4)	0.002
Volatile aromatic hydrocarbons (VAH)	0.3
Volatile organic compounds (VOC)	0.5

Emission testing must be performed according to the ISO 16000 standard, parts 3, 6, 9, & 11.

- Test reports showing that the requirement is fulfilled.
- Alternatively, a certificate from either Oeko-Tex class I Baby or CertiPUR may be used as documentation for the requirement.

### Background to the requirement

Filling and stuffing materials can include hazardous chemicals, either as residue from polymer production, or additives in the material. For example, polyurethane (PU) foam and polystyrene balls may contain and emit volatile organic compounds which may be hazardous to health<sup>137</sup>. As the user will be in close contact with these materials, and be exposed to any emissions, a requirement has been set for the most important substances. Several certification schemes have the same emission requirements for these filling and stuffing materials and here a requirement has therefore been set, which can be documented with commonly used certification schemes. According to Europur, up to 80% of the cups in bras are made of polyurethane foam. PU foam is also used in shoulder pads and other elements of textile products<sup>138</sup>.

There are small differences, for example that CertiPUR has a threshold value for aromatic hydrocarbons of 0.5 mg/m<sup>3</sup> instead of 0.3. It is, however, still considered appropriate to document the requirement with a CertiPUR certificate.

## O55 Polycyclic aromatic hydrocarbons (PAHs):

For foamed synthetic materials such as PU foam, latex foam, and expanded polystyrene the content of each individual PAH stated in the requirement shall be below 0.5 mg/kg.

The requirement concerns the following PAHs:

Substance name	CAS-no
Benzo[A]Pyrene	50-32-8
Benzo[E]Pyrene	192-97-2
Benzo[A]Anthracene	56-55-3

<sup>137</sup> Survey, emissions, and health assessment of chemical substances in baby products, Danish Environmental Protection Agency, 2008.

<sup>138</sup> Europur – the European organisation for manufacturers of foam products, <https://www.europur.org/applications/consumer-goods> (accessed 20.08.2019)

Dibenzo[A,H]Anthracene	53-70-3
Benzo[B]Fluoranthene	205-99-2
Benzo[J]Fluoranthene	205-82-3
Benzo[K]Fluoranthene	207-08-9
Chrysene	218-01-9

Must be tested in accordance with ISO 18287 or ZEK 01.2-08 (GC/MS).

- Test report showing that the requirement is fulfilled.
- A certificate from Oeko-Tex 100 class I Baby can also be used as documentation.

### Background to the requirement

There are more than 100 PAH compounds. Several of the PAHs are carcinogenic and classed as Carc.1B and genotoxic.

The PAHs usually originate from two types of additives, which are plasticising and process oils (extender oils) and carbon black, which is found in rubber and plastic products, and which is known to contain PAHs. Plasticising and process oil is a mineral oil product which originates from crude oil (petrogenic PAHs), while carbon black is a product that is produced by incomplete incineration or thermal degradation processes for heavy oils such as coal tar (primarily pyrogenic PAHs). Carbon black is used as a dye, amongst other things. PAHs have been found in expanded polystyrene<sup>139</sup> and PU foam<sup>140</sup> for consumer products, which makes this requirement relevant here.

The eight PAHs in the table are restricted in REACH and must thus not exceed 1 mg/kg of each. Clothes, shoes, and gloves are some of the consumer products covered by this REACH limitation<sup>141</sup>. The criteria requirement goes further than REACH, as it sets a maximum level of 0.5 mg/kg for each PAH.

### O56 Polyurethane foam (PU foam)

Fillings, stuffing materials and padding made from polyurethane foam shall meet the following requirements:

CFC, HCFC, HFC, methylene chloride or other halogenated organic compounds shall not be used as blowing agents in the production of the material.

- Declaration from the foam manufacturer/supplier about which blowing agent has been used.

### Background to the requirement

#### Blowing agents

Halogenated organic compounds may not be used as blowing agents or auxiliaries for these. Historically, CFC, HCFC and HFC have been used in the production of PU foam, and it is generally known that these substances are harmful to the environment, especially as greenhouse gases and as ozone depleting substances. The requirement prohibits the use of halogenated organic compounds that are used as blowing agents or auxiliaries for these. Many producers of PU foam have

<sup>139</sup> Si-Qi Li, PAHs in polystyrene food contact materials: An unintended consequence, Science of The Total Environment, Volume 609, 31 December 2017, Pages 1126-1131.

<sup>140</sup> Survey and risk assessment of chemical substances in bicycle helmets, The Danish Environmental Protection Agency 2018.

<sup>141</sup> Guideline on the scope of restriction entry 50 of Annex XVII to REACH: Polycyclic aromatic hydrocarbons in articles supplied to the general public, European Chemical Agency 2018.



replaced CFC and HCFC with carbon dioxide but ensuring that they are not used is still considered relevant.

Blowing agents are only relevant for PU foam, as the production of latex foam does not require blowing agents. Expanded polystyrene uses water or pentane as a blowing agent.

CertiPUR prohibits the use of CFC, HCFC and dichloromethane (methylene chloride), but does not set requirements concerning isocyanates.

## O57 Latex

Fillings, stuffing materials, and padding made from synthetic latex or natural latex shall meet the following requirements:

- The butadiene content in synthetic latex shall be lower than 1 mg/kg latex.
- The concentration of n-nitrosamines\* shall not exceed 0.0005 mg/m<sup>3</sup>, measured by the climate chamber test conducted in accordance with the standard ISO 16000-9.

\* *n-nitrosodimethylamine (NDMA), n-nitrosodiethylamine (NDEA), n-nitrosomethylethylamine (NMEA), n-nitrosodiisopropylamine (NDIPA), n-nitrosodi-n-propylamine (NDPA), n-nitrosodi-n-butylamine (NDBA), n-nitrosopyrrolidine (NPYR), n-nitrosopiperidine (NPIP), n-nitrosomorpholine (NMOR).*

Test method: Butadiene can be determined according to EN 13130-4 or similar method.

- The latex producer must state test results in accordance with the requirement.

## Background to the requirement

### 1,3-butadiene

Several synthetic latex materials contain substances that are harmful to health and the environment, including substances that are (suspected) carcinogens, such as 1,3 butadiene, CAS no. 106-99-0, in SBR rubber, which has the following classification: H340: May cause genetic defects and H350: May cause cancer. Butadiene functions as a monomer in the production of latex and the requirement aims to ensure that work is conducted to achieve the lowest possible monomer content in the final product.

### Nitrosamines

Substances that are harmful to health, such as nitrosamines, can be formed during the vulcanisation process. Latex is an elastomer which, on vulcanisation, can be changed so that the material is virtually insoluble in a solvent at boiling point

## 5.14 Hides/skins and leather

The section for hides/skins and leather includes both tanning with chromium III salts, aldehydes, as well as vegetable or mineral tanning processes if the requirements are met. The definition of "leather" in this section follows the standard EN15987.

Synthetic leather also called "vegan leather" is not covered by this requirement section but is included in the textile section of the criteria if both requirements



for the fibre and chemicals incl. polymer for coating as well as quality requirements for textiles can be complied with.

#### O58 Origin of hides/skins and leather

Only raw hides and skins from the following animals are permitted: fish\*, sheep, goats, cows, horses, pigs, elk, deer, and reindeer.

\* *Fish skin from fish red-listed by IUCN as critically endangered or endangered is not accepted. See the list here <https://www.iucnredlist.org/>*

- The applicant must submit a declaration from the leather producer or leather supplier, confirming that the raw hides/skins used derive from animals stated in the requirement.

#### Background to the requirement

The requirement has been set to ensure the use of only raw skins and hides that are a by-product of meat/milk/wool production or originates from free-living non-endangered species in the Nordic countries. This reduces the environmental impact of livestock farming and ethically it also makes good sense that the leather and hides/skins produced make use of raw hides that are by-products of meat/milk/wool production. In this generation of the criteria, the requirement now also permits fish skin, if it does not come from red-listed endangered species. Fish skin shall meet the same requirements as other types of hide/skin and leather. Synthetic leather also called "vegan leather" is not covered by this requirement section but is included in the textile section of the criteria if both requirements for the fibre and chemicals incl. polymer for coating as well as quality requirements for textiles can be complied with.

#### O59 Chromium content in leather and hides/skins

The extractable chromium content of the finished skin or leather (incl. finishing) must be less than 200 mg/kg (mass of chromium per total dry weight of leather or hide/skin) according to EN ISO 17072-1.

There shall be no chromium (VI) present in the final treated leather or hide/skin (including finishing), in accordance with EN ISO 17075 (detection limit of 3 ppm) or equivalent.

- The applicant shall submit a test report for both total chromium and chromium (VI), demonstrating fulfilment of the requirement.

#### Background to the requirement

The requirement has been tightened to also include a requirement on extractable total chromium, which shall be less than 200 mg/kg (mass of chromium per total dry weight of leather or hide/skin). With this, the requirement is harmonized with requirements for leather at Blue Engel and EU-Ecolabel.

The requirement that no chromium (VI) shall be present was also part of the previous generation 4. In the EU, there is a REACH restriction stating that leather parts that come into contact with the skin must not contain chromium (VI) with 3 mg/kg (3 ppm) or more<sup>142</sup>.

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<sup>142</sup> Entry 47, Chromium VI compounds <https://echa.europa.eu/documents/10162/1f775bd4-b1b0-4847-937f-d6a37e2c0c98>

The EN ISO 17075 standard recommends a detection limit of 3 ppm. The requirement here in these criteria goes further than the EU legislation by requiring that the test is submitted for verification.

Hexavalent chromium (Cr (VI)) is not used in the tanning industry and has no purpose in the tanning process. Chromium (III) salts may, however – under certain conditions – be converted into Cr (VI) compounds<sup>143</sup>. Leather products can release Cr (VI) compounds, which is a problem because hexavalent chromium compounds are contact allergens. Cr (VI) is considered one of the most widely known allergens.

The requirement does not exclude chrome tanning (chrome III) but requires a minimum content of extractable total chromium in the finished leather. 80 - 90% of skin and leather production globally use chromium (III) salts in their tanning processes and there are qualities that cannot be achieved with alternative tanning agents. This is described in the EU's Best Available Techniques (BAT) reference document for skins and leather. The reference document explains that this is the reason for the limited substitution of chrome tanning with alternative tanning agents. At the same time, it is today possible to minimize the extractable content of chromium (total) in the finished product as well as in the wastewater discharged to the aquatic environment.

Whichever tanning process is used, it is relevant to ensure a low level of chromium and particularly chromium (VI) in the finished leather. The requirement must thus be documented regardless of the tanning process. Standard ISO EN 15987 defines different types of tanning and for “chromium-free tanning” permits up to 0.1% total chromium in the finished leather. “Vegetable tanning” is permitted up to a total of 0.3% tanning metals (Cr, Al, Ti, Zr, Fe) in the leather.

The rest of the leather industry, which do not use chromium III salts, tends to use a vegetable, aldehyde, or other mineral tanning process. Each process has different important environmental and health aspects. EU Best Available Techniques (BAT) reference document for hides and skins does not specify a specific tanning process as BAT.<sup>144</sup> The choice of tanning technology depends largely on the properties required in the finished material, cost, the production facilities available and the type of raw material being processed. Because of its particular properties vegetable tanned leather is often used for shoe soles and other hard leather products. According to the EU's Best Available Techniques document for leather, vegetable tanned leather does not have the same properties as chrome tanned leather such as the same flexibility.

## O60 Cadmium and lead

Cadmium and lead compounds shall not be found in processed hides/skins or leather.

The content of cadmium and lead compounds shall be tested according to the methods AAS, ICP-OES or ICP-MS (detection limit 10 ppm).

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<sup>143</sup> Survey and health assessment (allergies only) of chromium in leather shoes.

<sup>144</sup> Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins, JOINT RESEARCH CENTRE 2013, Available at: [https://publications.jrc.ec.europa.eu/repository/bitstream/JRC83005/tan\\_published\\_def.pdf](https://publications.jrc.ec.europa.eu/repository/bitstream/JRC83005/tan_published_def.pdf)

- A test report from the tannery showing that the requirement is fulfilled.

### Background to the requirement

The requirement is set to ensure that there is no cadmium and lead in the finished hides/skins or leather. Lead occurs most often due to contaminants in the chromate during chromium tanning.

#### O61 Chemical overview for leather and hides/skin production

All chemical products used in the various processes during the production of hides/skins or leather shall be stated, with safety data sheets as documentation.

The following information must be submitted for each chemical product:

- trade name
- the function of the chemical
- the process step in which the chemical product is used
- supplier, that uses the chemical product

The requirement also applies to all chemical products used for coatings or other finishing.

- Overview providing the required information for all the chemical products used.  
 Safety data sheet for every chemical product, in line with Annex II of REACH 1907/2006.

### Background to the requirement

To gain an overview of which chemicals are used in the various processes for the production of hides/skins and leather, the criteria require the submission of a list of all the chemicals used.

#### O62 Classification of chemical products

The chemical product used shall not be classified as any of the hazard categories set out in the table below. The requirement applies to all chemical products used in every step of manufacturing leather and hides/skins (including finishing).

An exception is made for the requirement for the use of biocidal products in the tanning process if the active substance is permitted for skins and leather in EU Regulation (EU) No 528/2012.

CLP Regulation 1272/2008		
Hazard class	Hazard category	Hazard code
Toxic to aquatic life	Aquatic Acute 1	H400
	Aquatic Chronic 1	H410
	Aquatic Chronic 2	H411
Hazardous to the ozone layer	Ozone	H420
Carcinogenicity*	Carc 1A or 1B	H350
	Carc 2	H351
Germ cell mutagenicity*	Muta. 1A or 1B	H340
	Muta. 2	H341
Reproductive toxicity*	Repr. 1A or 1B	H360
	Repr. 2	H361
	Lact.	H362
Acute toxicity	Acute Tox 1 or 2	H300, H310, H330
	Acute Tox 3	H301, 311, 331
Specific target organ toxicity with single or repeated exposure	STOT SE 1	H370
	STOT RE 1	H372

Sensitising on inhalation or skin contact	Resp. Sens. 1, 1A or 1B Skin Sens. 1, 1A or 1B	H334** H317**
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\* Including all combinations of stated exposure route and stated specific effect. For example, H350 also covers the classification H350i.

\*\* Non-disperse dyes are exempt from the ban on H334 and H317, provided that non-dusty formulations or automatic dosing is used. If manual filling of automatic dosing systems is used, the manual handling must be carried out using the correct personal protective equipment in accordance with the safety data sheet (SDS) and/or using technical measures such as local extraction/ventilation.

- Declaration from the chemical manufacturer that the requirement is fulfilled.
- Exception for non-disperse dyes: Declaration that these are used as non-dusty formulations or that automatic dosing is used.
- Routine for the use of personal protective equipment when manually handling dusty colours or explaining technical measures.
- When using the exemption for biocidal products, a list of the biocidal products with associated active substances used must be submitted, including the corresponding H-phrases for the chemical biocidal products.

## Background to the requirement

Nordic Ecolabelling strives to ensure that the health and environmental impacts of the products are as low as possible. Therefore, there is a requirement prohibiting, for example, CMR classification, which thereby excludes some of the, in health terms, most problematic classifications of substances. The requirement covers all chemicals used in the production of hides/skins and leather, to ensure a focus on this in all processes that make use of chemicals.

In addition to chemicals for the tanning process itself, chemicals such as dyes, auxiliary chemicals, finishing chemicals, solvents, enzymes, biocides, and various inorganic standard chemicals are also used. There is a significant variation in the amount of chemicals used, depending on the type of leather product and the chosen process. The most widely used inorganic chemicals are sodium sulphide, calcium hydroxide, acids, carbonates, sulphites, and sulphates. The greatest variation can be found in the number of tanning agents used<sup>145</sup>.

An exception has been made in this requirement for biocidal products, which are permitted for skins and leather in EU Regulation (EU) No 528/2012, as the very purpose of tanning is to prevent skins and leather from rotting due to microbial infestation. Here is a need for treatment with an antibacterial effect. In the EU's Best Available Techniques (BAT) reference document, it is BAT to use only biocidal products approved in accordance with EU Regulation No. 528/2012 to minimize the emissions of biocides in wastewater.

### O63 Classification of ingoing substances in chemical products

Chemical products shall not contain any ingoing substances\* that have any of the classifications stated in the table below. The requirement applies to all chemicals used in every step of manufacturing leather and hides/skins (including finishing).

\* See the definition of ingoing substances and impurities in section 5.2.

<sup>145</sup> Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins, JOINT RESEARCH CENTRE 2013.

CLP Regulation 1272/2008		
Hazard class	Hazard category	Hazard code
Carcinogenicity	Carc. 1A or 1B Carc. 2	H350 H351*
Germ cell mutagenicity	Muta. 1A or 1B Muta. 2	H340 H341
Reproductive toxicity	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362

*Including all combinations of stated exposure route and stated specific effect. For example, H350 also covers the classification H350i.*

\* **Exemption:** *Titanium dioxide (TiO<sub>2</sub>)* which is added in powder form during the raw material production.

- Declaration from the chemical manufacturer that the requirement is fulfilled.

### Background to the requirement

The requirement is new in this generation of the criteria. The requirement excludes all constituent CMR substances to an absolute level of 0 ppm. There is thus no triviality limit for ingoing substances. Ingoing substances are defined as all substances, whatever their concentration, in a used chemical (e.g., pigment or bleaching agent) or blend of chemicals (e.g., printing paste, coating), including additives (e.g., preservatives and stabilisers). Known products released from ingoing substances (e.g., formaldehyde, arylamine and in-situ generated preservatives) are also considered to be constituent. Impurities are defined as residual substances from production, including raw material production, that are present in a used chemical or blend of chemicals in concentrations of ≤100.0 ppm (≤0.01000 weight%, ≤100.0 mg/kg).

The prohibition of all constituent CMR substances in categories 1A, 1B and 2 now has its own separate requirement. Nordic Ecolabelling strives to ensure that the health and environmental impacts of the products are as low as possible. Therefore, there is a requirement prohibiting specific CMR classification, which thereby excludes some of the, in health terms, most problematic classifications of substances. The requirement covers all chemicals used in the production of hides/skins and leather, to ensure a focus on this in all processes that make use of chemicals.

After consultation an exception has been made for titanium dioxide which is added in powder form during raw material production. On February 18, 2020, the European Commission published the decision that titanium dioxide will be classified as a suspected carcinogen (Category 2, H351) upon inhalation under the CLP Regulation. The classification is only applicable to mixtures in the form of powders containing at least 1% of titanium dioxide particles which are in the form of or incorporated into particles having an aerodynamic diameter of ≤10 µm. The classification provision has been debated, as the risk that gives rise to the hazard classification applies to inhalation of powder, and not the chemical substance itself. Liquid and certain solid mixtures are not classified. It can be difficult to find replacements in the short term, which is why Nordic Ecolabelling has made an exception for the use of titanium dioxide in powder form.

## O64 Prohibited substances

The following substances shall not be present as ingoing substance\* in chemical products used to produce hides/skins and leather. The requirement applies to all chemicals used in every step of manufacturing leather and hides/skins (including finishing).

\* See definition of ingoing substances in section 5.2 Definitions.

- Substances on the Candidate List (<https://echa.europa.eu/candidate-list-table>). The siloxanes D4, D5 and D6 have their own documentation requirements, see requirements O41.
- Substances that are PBT (Persistent, Bioaccumulative and Toxic) or vPvB (very Persistent and very Bioaccumulative) as set out in the criteria of REACH Annex XIII
- Potential or identified endocrine disruptors according to any of the EU member state initiative “Endocrine Disruptor Lists”, List I, II and III. See the following links:
  - <https://edlists.org/the-ed-lists/list-i-substances-identified-asendocrine-disruptors-by-the-eu>
  - <https://edlists.org/the-ed-lists/list-ii-substances-under-eu-investigation-endocrine-disruption>
  - <https://edlists.org/the-ed-lists/list-iii-substances-identified-asendocrine-disruptors-by-participating-national-authorities>

*A substance which is transferred to one of the corresponding sub lists called “Substances no longer on list”, and no longer appears on any of List I-III, is no longer excluded. The exception is those substances on sub list II which were evaluated under a regulation or directive which doesn’t have provisions for identifying EDs (e.g., the Cosmetics Regulation, etc.). For those substances, ED properties may still have been confirmed or suspected. Nordic Ecolabelling will evaluate the circumstances case-by-case, based on the background information indicated on sub list II.*

- Flame retardants (e.g., short chain chloroparaffins)
- Per- and polyfluoroalkyl substances (PFASs), e.g., PFOA and PFOS
- Nanomaterials/-particles\*
- Heavy metals in dyes and pigments\*\*
- Azo dyes that may release carcinogenic aromatic amines (see 0)
- Phthalates
- Organotin compounds
- Chlorinated solvents, including chlorotoluenes, chlorophenols and chlorobenzenes
- APEO and APD (alkylphenol ethoxylates) and other alkylphenol derivatives
- Linear alkylbenzene sulphonates (LAS)
- Aziridines and polyaziridines
- EDTA (ethylene diamine tetraacetic acid) and DTPA (diethylene triamine pentaacetate)

\* The definition of nanomaterial follows the European Commission’s definition of nanomaterial of 18 October 2011 (2011/696/EU). Pigments are exempted from the requirement.

\*\* Heavy metals include metals listed in this section. Exemptions from the requirement are granted for metal impurities in dyes and pigments up to the amounts set out in ETAD, Annex 2 “Heavy metal limits for dyes”: antimony (50

ppm), arsenic (50 ppm), cadmium (20 ppm), chromium (100 ppm), lead (100 ppm), mercury (4 ppm), zinc (1500 ppm), copper (250 ppm), nickel (200 ppm), tin (250 ppm), barium (100 ppm), cobalt (500 ppm), iron (2500 ppm), manganese (1000 ppm), selenium (20 ppm) and silver (100 ppm).

- Declaration from the chemical manufacturer or chemical supplier that the requirement is fulfilled.

### Background to the requirement

The requirement is new, bringing together several requirements from the previous generation of the criteria (requirements O41, O44, O45, O46 and O47). The requirement now covers more substance groups.

In addition to chemicals for the tanning process itself, chemicals such as dyes, auxiliary chemicals, finishing chemicals, solvents, cross-linking agents, enzymes, biocides, and various inorganic standard chemicals are also used. Cross-linking agents may be used in the finishing stage. The following are sometimes used, for example: polyisocyanates, carbodiimides and aziridines.

**Aziridines** are highly toxic, and for this reason they have been replaced by **polyaziridines**, which are less toxic and can be used for base garments and outerwear. Ethylenimine-based cross-linking agents are used for the top finish. Ethylenimine is toxic and carcinogenic.

**Per- and polyfluoroalkyl substances** are sometimes used in leather production as water repellent, oil repellent and dirt repellent agents.

**Flame retardants** are only used on leather in certain specific contexts. These include aircraft and train seats and furnishings for public buildings. In addition, **phthalates** may be used in softeners and **azo dyes** often used in dyeing. Abrasives may be used on vegetable tanned leather to even out the colour of the substrate before the dyeing operation. This action is performed more rarely on chromium tanned leather. The chemicals used in this process are salts that release sulphur dioxide, oxalic acid, **EDTA**, bleaching syntans and so on<sup>146</sup>. See also the background text for requirement O35.

### O65 Biocides and antibacterial substances

The addition and/or integration of substances that may have a biocidal and/or antibacterial effect in the final hides/skins or leather product is not permitted.

An exemption is given for the use of biocidal substances in the tanning process itself if the active substance is permitted for skins and leather in EU Regulation (EU) No 528/2012.

*Biocides/antibacterial substances include silver compounds, organotin compounds, chlorophenols, nano silver and nanogold.*

- Declaration from the producer of the hide/skin or leather that the requirement is fulfilled.
- When applying the exemption for biocidal products, a list of the biocidal products with associated active substances used must be submitted.

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<sup>146</sup> Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins, JOINT RESEARCH CENTRE 2013.



## Background to the requirement

See background to requirement O36.

**Biocides** may be used in various tanning processes to protect the substrate against microbial attack.

### O66 Discharges to wastewater

Wastewater from tanneries shall contain no more than 1 mg chromium (total) per litre of water tested according to ISO 6060 or equivalent.

The value for COD (chemical oxygen demand) in the wastewater from tanneries which is discharged to surface water after treatment must not exceed 200 mg/l. Wastewater discharged to municipal or other regional treatment is excluded

The requirement covers both the tanning process itself and post-tanning.

Test report shall be submitted upon application and then the applicant shall have a routine to test annually according to the requirement as well as ensure compliance with the requirement. Nordic Ecolabelling shall be notified if the requirement is not complied with.

- Test report showing that the requirement is fulfilled.
- Description of how wastewater from wet process is treated and whether it is discharged to municipal or other regional treatment.

## Background to the requirement

### Chromium

The most significant source of chromium is wastewater from the tanning process, but wastewater from post-tanning processes may also contain chromium, if chromium is used in post-tanning. Small quantities of chromium may also be flushed out during the wet process steps that follow chromium tanning or post-tanning. The requirement level for chromium in wastewater remains unchanged from the previous generation of the criteria. The EU Ecolabel criteria for footwear and Blaue Engel have the same requirement concerning the chromium content of wastewater.

### COD (chemical oxygen demand)

The requirement is now harmonized with similar requirements in EU-Ecolabel's criteria for footwear as well as Blue Angel's criteria for leather. The requirement now provides an exemption for wastewater that is discharged to municipal or other regional treatment. Here, the tannery does not have the opportunity to influence the effect and what else is led to the plant. This is the same way the criteria set COD requirements for both wool washing and textile production.

COD content in the wastewater is a parameter that has a high RPS. Organic compounds that use up the oxygen in the aquatic environment during decomposition can be a major problem if good treatment plants are not available. This is something that tanneries are actively working to reduce. Nordic Ecolabelling therefore set requirements to limit COD emissions.

### O67 Water consumption for hides/skins and leather

The annual average water consumption for tanning leather shall not exceed the following limit values:



Type of skin and leather	Limit value
Raw hide	25 m <sup>3</sup> /ton
Vegetable tanned leather	35 m <sup>3</sup> /ton
Skin (from calf and goat)	45 m <sup>3</sup> /ton
Pigskin	80 m <sup>3</sup> /ton
Sheepskin	120 l/skin.

- ☒ State the water consumption and submit documentation confirming consumption, for example from suppliers or copies of invoices. State the total amount in tonnes of hides/skins/leather that has been treated and a calculation showing water consumption per tonne of hides/skins/leather.

### Background to the requirement

Reducing water consumption is considered an important element of environmental work. According to the IPPC's draft from 2011<sup>147</sup>, normal water consumption at modern tanneries can be cut from 40-50 m<sup>3</sup>/tonne of raw hide to 12-30 m<sup>3</sup>/tonne of bovine/cattle hide if the tannery has effective control over its process. According to the draft, there are tanneries in Germany that consume 15-20 m<sup>3</sup>/tonne and one tannery reports 9 m<sup>3</sup>/tonne. A tannery in the Netherlands states that it consumes around 20 m<sup>3</sup>/tonne of fresh bovine hides. Tanning calfskin requires more water – about 40 m<sup>3</sup>/tonne.

The conclusion in the draft is that BAT for water consumption for bovine hides ranges from 16-28 m<sup>3</sup>/tonne of raw hide. Based on this information, Nordic Ecolabelling has chosen to set the requirement at 25 m<sup>3</sup> water/tonne of hide/skin/leather that is processed.

The requirement level of 25 m<sup>3</sup> water/tonne of raw hide remains unchanged from generation 4 of the criteria. However, for vegetable tanning, calf and goatskin, pigskin and sheepskin, specific requirement level has been set in this generation of the criteria. Note that the unit for the sheepskin requirement is l/skin, not m<sup>3</sup>/tonne<sup>148</sup>.

However, it is uncertain whether it is possible to tan sheepskin without the use of organic chlorine compounds, which are excluded here in the criteria. The requirement is then harmonized with Blue Angel's criteria for leather.

### O68 Energy consumption

The amount of electricity (in kWh) and fuel consumed during tanning of hides/skins and leather shall be stated.

- ☒ State the consumption of electricity (in kWh) and the purchase of fuel and attach confirmation from the supplier or a copy of the invoice to document this. State the total weight (in kg) of the hides/skins and leather processed.

### Background to the requirement

The requirement remains unchanged from generation 4 of the criteria. The greatest energy consumption relates to the thermal energy used to heat process water and to dry and heat the premises. It is necessary for data to be compared for the same phases in the leather production process. Ideally, energy

<sup>147</sup> Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skin, Joint Research Centre 2013.

<sup>148</sup> Stefan Ryden, personal comments, March and December 2011.

consumption should be considered and reported separately for each stage of the process, and it is known that some of the most energy-efficient tanneries do this. Where more detailed data about energy consumption is available, it is important that comparisons between tanneries are based on the same underlying data. For example, “wastewater treatment” may possibly not include biological treatment, which can account for more than 50% of the total energy consumed in the treatment of a tannery’s wastewater.

## 5.15 Quality and performance requirements

Nordic Ecolabelling sets requirements concerning the performance and durability of textiles, hides/skins, and leather.

These requirements are important, since a Nordic Swan Ecolabelled product must offer good quality and seen from an environmental and resource perspective, products must be usable for a certain length of time before they wear out and a new replacement is required.

If the Nordic Swan Ecolabelled product is not in production at the time of application, the quality requirements may be documented with tests of a similar textile product. In such cases, this must be described.

### 5.15.1 Quality and performance requirements for textiles

#### O69 Formaldehyde emissions from textiles

The amount of free and partly hydrolysable formaldehyde in the final textile shall not exceed 16 ppm.

Test method: The content of formaldehyde shall be tested in accordance with standard EN ISO 14184-1.

- ☒ Test report showing that the requirement is fulfilled or a certificate from Oeko-Tex 100 class I Baby or GOTS can also be used as documentation.

#### Background to the requirement

The requirement has been tightened from 20 ppm to 16 ppm since the previous generation of the criteria.

Formaldehyde is classified as hazardous to health, due to being carcinogenic and irritating to the eyes, throat, and skin. Formaldehyde residues in textiles can often originate from finishing with anti-crease agents. A certificate for Oeko-Tex 100 class I Baby (>16 mg/kg) and for GOTS (>16 mg/kg) may be used as documentation, even though Oeko-Tex uses the test standard Japanese Law 112. Oeko-Tex, GOTS and the EU-Ecolabel accept higher formaldehyde emissions for certain types of textiles. The EU-Ecolabel has a requirement level of max. 16 ppm for products aimed at children under 3 years old and products in direct contact with the skin. For garments with limited skin contact and home furnishings, the EU-Ecolabel has a limit of max. 75 ppm. Oeko-Tex 100 has requirement levels of 16, 75, 150 and 300 ppm, depending on the exposure scenario.

#### O70 Loss of fibre fragments from textiles

Fabrics, included with more than 10% by weight in the textile product and consist of at least 90% by weight of synthetic fibres, shall be tested for loss of

fibre fragments according to either the TMC test method, standard ISO/DIS 4484-1 or AATCC TM212.

Nordic Ecolabelling can insert a limit value in the requirement when a relevant rating system with applicable limit values has been developed.

*Nordic Ecolabelling encourages that test results to be sent to TMC (The Microfiber Consortium) as a basis for developing a rating system.*

- Test report showing that the requirement is fulfilled.

### **Background to the requirement**

Loss of fibre fragments from washing of textiles is an area of great focus in relation to potential microplastic contamination of the aquatic environment. However, it is only right now that recognized standardized test methods have been developed for determining the loss of fibre fragments when washing textiles in household washing machines. Although, these test systems are not ready to define specific limit values, Nordic Ecolabelling considers it important to start testing. Later, when enough knowledge and data are collected, limit values can be inserted in the requirement. At the same time, a test for loss of fibre fragments will already today provide manufacturers with information about their textiles, as well as provide data for the work of developing a rating system. Nordic Ecolabelling encourages test results to be shared with, for example, TMC (The Microfiber Consortium), which needs this data to be able to develop a rating system.

These test methods today do not distinguish between natural and synthetic fibres. As there is a particular need to obtain knowledge about the extent of the synthetic fibre fragment loss from different textile types, it is chosen to focus on fabric with a minimum of 90% by weight of synthetic.

### **071 Dimensional changes during washing and drying**

Dimensional changes after washing and drying shall not exceed:

- $\pm 2\%$  for curtains and upholstery covers that are removable and can be washed.
- $\pm 5\%$  for woven textiles for duvets and pillows, in accordance with EN 13186.
- $\pm 5\%$  for bedding, tablecloths, and napkins
- $\pm 7\%$  for terry towels and washcloths
- $\pm 2\%$  for woven products of wool blend and synthetic fibres
- $\pm 3\%$  for woven textiles not covered by the categories above.
- $\pm 5\%$  for knitwear/hosiery
- $\pm 10\%$  for 100% wool knitwear (after 10 washes)

The requirement does not apply to fibres or yarns, products clearly labelled “dry clean only” or equivalent (if the product in question is normally labelled in this way), nor upholstery that is not intended for removal and washing.

#### **The following testing procedure must be followed:**

- 10 washes for 100% wool clothing textiles and 1 wash for other textiles
- Temperature, laundry program and detergent as stated on the care label
- drying as stated on the care label
- 100% wool textiles should be stretched back into shape after each wash

#### **Test method:**

The tests should be carried out in accordance with EN ISO 6330 “Textiles – Domestic washing and drying procedures for textile testing”, combined with ISO 5077 “Textiles – Determination of dimensional change in washing and drying”.

**For professional textiles** intended for industrial laundry, the standard ISO 15797 Textiles – “Industrial washing and finishing procedures for testing of workwear”, combined with EN ISO 5077.

**Woven products for duvets and pillows** with feathers and down filling are to be tested in accordance with EN 13186 – “Specification of feather and down filled bedding articles”.

- Test report showing that the requirement is fulfilled

### Background to the requirement

The requirement has been set to ensure the high quality of the Nordic Swan Ecolabelled textile. The requirement has been amended since the previous generation of the criteria. There is now a specific requirement for bed linen. At the same time, it is now required for 100% wool knitwear for clothing to be washed 10 times before the final measurement. This is to ensure that the anti-felt treatment of the wool fibre also has effect after several washes. 10 times washing is not required for wool textiles for furniture. See additional background text on wool treatment in requirement O31.

### O72 Tear strength

Woven fabrics must comply with the levels specified table below for tear strength according to the ISO 13937-1 standard. The requirement must be documented for a representative samples of the whole Nordic Swan Ecolabelled collection.

The test must be performed on the outer fabric and thus does not include any inner lining in the product.

Product type	Tear Strength
Trousers, shorts, skirts	1,5 daN
Jackets and coats	1,2 daN
Sportswear, ski clothing and other outdoor wear	1,2 daN
Lingerie, pyjamas, and other nightwear	0,8 daN
T-shirts, blouses, shirts, and dresses	0,8 daN
Swimwear	1,0 daN
Bed linen and sheets	0,8 daN
Towels	0,8 daN

- Test reports according to ISO 13937-1, which shows that the requirement is met.

### Background to the requirement

The requirement refers to the test standard ISO 13937-1 Textile testing - Determination of tear strength - Part 1: Elmendorf method.

This standard describes the determination of tear strength with a pendulum apparatus, which defines the required tear force to cause a single tear of defined length from a cut in a fabric when a sudden force is applied.

The requirement is new and has been inserted to provide a long lifetime for the textile. The test must be performed on the outer fabric and thus does not include any inner lining in the product.

### O73 Tensile strength

Woven fabrics must comply with the levels specified in the table below for tensile strength according to the ISO 13934-2 standard. The requirement must be documented for a representative samples of the whole Nordic Swan Ecolabelled collection.

The test must be performed on the outer fabric and thus does not include any inner lining in the product.

Product type	Tensile strength
Trousers, shorts, skirts	18 daN
Jackets and coats	15 daN
Sportswear, ski clothing and other outdoor wear	18 daN
Lingerie, pyjamas, and other nightwear	12 daN
T-shirts, blouses, shirts, and dresses	12 daN
Swimwear	15 daN
Bed linen and sheets	12 daN
Towels	12 daN

- Test reports in accordance with ISO 13934-2, which show that the requirement is met.

#### Background to the requirement

The requirement refers to the test standard ISO 13934-2 Textiles - Textile tensile strength - Part 2: Determination of maximum strength (grab method). The test method is mainly applicable to woven fabrics. The method specifies the determination of the maximum strength of test samples in equilibrium with the standard atmosphere for testing and of test samples in the wet state. 1 daN is equal to approx. 1 kg power.

The requirement is new and has been inserted to provide a long lifetime for the textile. The test must be performed on the outer fabric and thus does not include any inner lining in the product.

### O74 Seam strength – woven fabrics

Woven fabrics must at a minimum comply with the levels specified in the table below for the determination of maximum force to seam rupture in accordance with the ISO 13935-2 standard. The requirement must be documented for a representative samples of the whole Nordic Swan Ecolabelled collection.

Product type	ISO 13935-2
The seam in the lining	80N
Textile with fabric weight <220g/m2	150N
Textile with fabric weight >220g/m2	200N
Backpacks and bags	200N

- Test reports showing that the requirement is met.

#### Background to the requirement

The requirement is new and is set to ensure high seam strength for the finished textile and thus to provide a long lifetime for the textile. The requirement refers to ISO 13935-2 Textiles - Textile seam strength - Part 2: Determination of maximum seam strength (grab method). The method can be used mainly on woven fabrics, including fabrics with stretch.

## O75 Seam slippage resistance – woven fabrics

Woven fabrics listed in the table below must comply with the seam slippage resistance indicated in the table below. Testing can either be in according to EN-ISO 13936-1 or EN-ISO 13936-2. The requirement must be documented for representative samples of whole the Nordic Swan Ecolabelled collection.

Product type	EN-ISO 13936-1	EN-ISO 13936-2
Trousers, shorts, skirts	4 mm at 14 daN load	12 daN load at 3 mm
Jackets and coats	4 mm at 14 daN load	12 daN load at 4 mm
Sportswear, ski clothing and other outdoor wear	4 mm at 14 daN load	12 daN load at 4 mm
Lingerie, pyjamas, and other nightwear	4 mm at 10 daN load	6 daN load at 3 mm
T-shirts, blouses, shirts, and dresses	4 mm at 11 daN load	6 daN load at 3 mm
Swimwear	4 mm at 14 daN load	6 daN load at 3 mm
Bed linen and sheets	4 mm at 10 daN load	6 daN load at 3 mm

Test reports showing that the requirement is met.

### Background to the requirement

The requirement is new is set to ensure high slippage resistance of yarns at a seam in woven fabrics. This is to ensure that the fabric can achieve a long lifetime and not be discarded prematurely. The requirement makes it possible to choose between the test methods in the standards EN-ISO 13936-1 or EN-ISO 13936-2, both of which include determination of the slippage resistance of yarns at a seam in woven fabrics.

## O76 Colour fastness to light

Colour fastness to light must be tested according to EN ISO 105 B02 or equivalent and meet the following levels:

- For textiles for outerwear, swimwear, and UV protective clothing: level 5
- For textiles for furniture, curtains, and drapery: level 5

Level 4 is permitted for textiles for furniture, curtains, or drapery, if the textile is both lightly dyed (standard depth <1/12 in accordance with 105 A06) and consists of blends with more than 20% wool or other keratin fibres, or of blends with more than 20% linen or other bast fibres.

The requirement does not apply to white textiles, mattress covers and mattress protectors.

Test report showing that the requirement is fulfilled.

### Background to the requirement

The requirement has been set in order to ensure that a dyed or printed textile can resist colour changes (fading) due to the influence of light, so that the product retains its desired colour over a long period of time. The requirement thus helps to ensure that the textile has a long life.

The requirement in this generation of the criteria has been expanded to also include textiles for outerwear, swimwear, and UV protective clothing, which has to survive prolonged exposure to sunlight. The requirement does not apply to white textiles. In the standard ISO 105-B02 the scale goes from 1-8 where 8 is best.

Fade resistance expresses how quickly the colour disappears under the influence of light. A high degree of fade resistance is desirable, and this can primarily be

achieved by using the appropriate choice of dye, while the actual dyeing process also has an influence. The requirement refers to the EN ISO 105 B02 standard: “Textiles – Testing of colour fastness – Part B02: Colour fastness to artificial light: xenon blue as light source”. The artificial light represents daylight. Oeko-Tex 100 do not set requirements to colour fastness to light.

#### **O77 Colour fastness to wash and dry cleaning**

Colour fastness to either wash or dry cleaning shall meet the following conditions as a minimum:

- For colour change: level 3-4
- For discolouration: level 3-4

The requirement does not concern white products and products that are neither dyed nor printed, nor furniture textiles that are not intended for removal and washing or dry cleaning.

Test method for wash: The tests shall be performed in accordance with ISO 105 C06 (a single wash at the temperature stated on the product), or equivalent.

Test method for dry cleaning: The test must be carried out in accordance with ISO 105 D01

- Test report showing that the requirement is fulfilled.

#### **Background to the requirement**

The requirement has been set to ensure high quality and a long lifetime for the products. The requirement refers to the ISO 105 C06 standard: “Textiles – Testing of colour fastness – Part B02: Colour fastness to domestic and commercial laundering”. The GOTS standard also tests to ISO 105-C06 and sets the same requirement level. A GOTS transaction certificate is therefore acceptable as documentation.

The requirement is set to ensure high quality and long lifetime for the products. The requirement has been tightened to now also include textiles that according to the care label can be dry cleaned. The requirement therefore now refers to both the standard ISO 105 D01 and ISO 105 C06. The level itself remains at 3-4, as the Nordic Ecolabelling experience that a mandatory requirement of 3-4 for all coloured textiles is a strict requirement. The GOTS standard also tests according to ISO 105-C06 and sets the same requirements level for textiles according to care label can be washed.

The Oeko-Tex 100 standard tests to ISO 105-E01. ISO 105 Part E01 describes methods for determining how resistant the colour is to all forms of exposure to water, but not washing.

#### **O78 Colour fastness to perspiration and saliva**

Underwear, sportswear, and t-shirts must as a minimum meet the following levels for colour fastness to perspiration and baby clothes (0-36 months) must as a minimum meet the following levels for colour fastness to saliva.

##### **Levels for colour fastness:**

- For discolouration: level 4
- For staining: level 4

Level 3 is, however, permitted for textiles that are dark in colour (standard depth >1/1 according to ISO 105-A06) and/or made from recycled wool.



The requirement does not cover white textile products or textile products that are neither dyed nor printed.

Test method: Tests must be performed in accordance with ISO 105 E04 (both acid and alkaline, plus comparison with textile of blended fibres) or equivalent.

- ☒ Test report showing that the requirement is fulfilled. If only level 3 is met, it must be declared that the standard depth is >1/1 according to ISO 105-A06.

### Background to the requirement

The requirement is new and has been set to ensure high quality and a long lifetime for the products. The requirement includes testing of products that are most often exposed to either perspiration/sweat or saliva.

#### 079 Colour fastness to rubbing (wet)

The requirement does not concern white products or products that are neither dyed nor printed.

**Test method:** Tests shall be performed in accordance with ISO 105 X12 or equivalent.

Colour fastness to wet rubbing shall be at least level 3-4. However, for products in dark colours\* the level shall be at least 2-3.

\* *Dark colours are defined as Munsell value 0, 1 or 2.*

Specific for denim:

Dark and medium coloured denim are exempt from requirement level of 3-4.

Dark coloured denim must instead document that level 1-2 is met.

Medium coloured denim must instead document that the level 2-3 is met.

When using this exemption, the product must be accompanied by information that the textile's dye may cause cross-staining.

- ☒ Test report showing that the requirement is fulfilled.
- ☒ For products in dark colours: Information about the Munsell value, if the wet rubbing is less than level 3-4.
- ☒ For dark and medium denim: Documentation must be submitted to include information on the product that the fabric's colour may be contaminated.

### Background to the requirement

The requirement has been set to ensure that the dye is well fixed in the textile. If the colour fastness to wet rubbing is good, the other characteristics, such as wash resistance and durability, will automatically also be good, since wet rubbing in accordance with ISO 105 X12 is a standardised method of checking the fixing of the dye on the fabric. The requirement has an exemption for denim indigo dye. Without finishing, it is not possible to achieve strong colour fastness for denim indigo dye. Chemicals are often used to fix the dye in raw denim to avoid the dye cross-staining. These chemicals tend to be harmful to health and the environment, and so will not comply with Nordic Ecolabelling's chemical requirements for finishing. Finishing is therefore not considered a good environmental solution.

The requirement refers to EN ISO 105-X12 "Textiles – Testing of colour fastness – Part X12: Colour fastness to rubbing". The scale is described in ISO 105-A03.



Textiles in dark colours are defined here as Munsell value of 0, 1 or 2. Value, or lightness, varies from black (value 0) to white (value 10)<sup>149</sup>.

This requirement is relevant in relation to the textile's durability, and to ensure that the dye does not cause cross-staining when the product is used. A GOTS or Oeko-Tex certificate cannot be used as documentation of the requirement, as these schemes have lower levels.

#### **O80 Colour fastness to rubbing (dry)**

Colour fastness to dry rubbing shall be at least level 4.

The requirement does not apply to white textile products, textile products that are neither died nor printed, curtains or other equivalent home furnishing textiles.

Dark coloured denim is exempted from the requirement for a minimum of level 4. Dark coloured denim must instead achieve at least a level 3. When using this exemption, the product must be accompanied by information that the textile's dye may cause cross-staining.

Test method: Tests shall be performed in accordance with ISO 105 X12 or equivalent.

- Test report showing that the requirement is fulfilled.

#### **Background to the requirement**

The requirement has been set to ensure that the dye is well fixed in the textile. If the colour fastness to dry rubbing is good, the other characteristics, such as wash resistance and durability, will automatically also be good, since dry rubbing in accordance with ISO 105 X12 is a standardised method of checking the fixing of the dye on the fabric. The requirement refers to EN ISO 105-X12 "Textiles – Testing of colour fastness – Part X12: Colour fastness to rubbing". The scale is described in ISO 105-A03.

The overall requirement is unchanged since the previous generation of the criteria, as the requirement is still considered to be ambitious. EURATEX (the European Apparel and Textile Confederation) also recommends level 4. Oeko-Tex 100 sets the same requirements for colour fastness to dry rubbing.

#### **O81 Ban on fabricated fabric holes**

The fabric and the final product must not be made with "wear" holes, that are fabricated to look like wear.

- Declaration by the textile manufacturer that the requirement is fulfilled.

#### **Background to the requirement**

The requirement is to ensure, that the fabric is not manufactured with a design with fabricated "wear" holes. Fabricated "wear" holes will greatly reduce the wear resistance of the fabric and will significantly shorten the lifetime of the fabric. To stimulate a more circular economy in relation to the consumption of textiles, it is important to ensure design for longevity in order to keep the textile in use for as long as possible.

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<sup>149</sup> [https://en.wikipedia.org/wiki/Munsell\\_color\\_system](https://en.wikipedia.org/wiki/Munsell_color_system)

## O82 Abrasion resistance

The following textile products in the table below are subject to requirements concerning abrasion resistance, expressed as number of rubs/abrasions (Martindale).

The requirement must be documented for representative samples of whole the Nordic Swan Ecolabelled collection.

Tests shall be performed in accordance with EN ISO 12947-2 or an equivalent standard.

Textiles for professional use	Limit value
Commercial upholstery	50.000
Work wear for outdoor use (only woven fabric)	30.000
Work wear for indoor use (only woven fabric)	20.000
Textiles for consumers	Limit value
Domestic upholstery	30.000
Trousers, shorts, skirts	20.000
Jackets and coats	16.000
Sportswear, ski clothing and other outdoor wear	20.000
Lingerie, pyjamas, and other nightwear	10.000
T-shirts, blouses, shirts, and dresses	12.000
Swimwear	20.000
Bed linen and sheets	10.000
Knit	8.000

☒ Test report showing that the requirement is fulfilled.

### Background to the requirement

The requirement has been set to ensure that the textile is hard-wearing in terms of its resistance to abrasion. Abrasion resistance corresponds to the number of abrasions needed for two threads on a woven piece of textile to be worn through. The requirement is divided into textile products for professionals and private individuals as well as different types of textiles. Here, the abrasion resistance has been set at levels that are relevant for the specific textile product. When determining levels, the levels at Svensk Møbelfakta, Norsk Møbelfakta and Euratex have been looked into<sup>150</sup>. For upholstery, the abrasion resistance can vary from 20,000 up to 120,000. Here it is relevant to take into account whether the upholstery is used for domestic or professional use. Norsk Møbelfakta has levels of both 50,000 for furniture textiles for professional use and 80,000 for extra hard professional use. For Nordic Ecolabelled textiles, a distinction is only made between private and professional use, as it is not possible to control an even more specific use of the textile in connection with the certification itself. Textiles with very high abrasion resistance are often used to reinforce the knees of trousers, for example. This very high abrasion resistance may be achieved by using two or three layers of special fabric.

## O83 Pilling

The textile must have a durability against pilling at least corresponding to the level specified for the textile type in the table below.

<sup>150</sup> EURATEX Recommendations Concerning Characteristics and Faults in Fabrics to be Used for Clothing.

Test method: Tests shall be performed in accordance with EN ISO 12945-2 or an equivalent standard.

Type of textile	Limit value
Clothing - woven fabric	4 (1000 rubs)
Clothing - woven fabric with raised surface	2-3 (1000 rubs)
Clothing - knit	2-3 (1000 rubs)
Fleece	4 (5000 rubs)
Upholstery for private use	3-4 (5000 rubs)
Upholstery for professional use	4 (5000 rubs)
Upholstery of wool or wool blends for professional use	3-4 (5000 rubs)

☒ Test report showing that the requirement is fulfilled.

### Background to the requirement

The requirement has been tightened since the previous generation 4 of the criteria. Textiles for clothing are now also covered by the requirement. A specification is added with a new requirement level for wool or wool blend upholstery fabrics, as wool fabrics often have a natural pilling in the beginning when the fabric is used. For textiles it is relevant to ensure that the fabric does not pill easily, in order to give the product as long a lifetime as possible. When determining the requirement levels, the levels of Svensk Møbelfakta, Norsk Møbelfakta and Euratex in relation to clothing have been looked into<sup>151</sup>.

## 5.15.2 Quality and performance requirements for hides/skins and leather

### O84 Formaldehyde

The amount of free and partly hydrolysable formaldehyde in the final skin and leather shall not exceed:

- 20 ppm in products for children
- 75 ppm in other products

Test method: The content of formaldehyde must be tested in accordance with EN ISO 17226-1 or 2.

☒ Test report showing that the requirement is fulfilled.

### Background to the requirement

The requirement has been set to limit exposure to formaldehyde, which is classified as carcinogenic. The content of formaldehyde in the finished leather must not exceed 20 ppm in hides/skins and leather in products for children, and 75 ppm in other products. The requirement levels are identical with the formaldehyde requirements for the EU Ecolabel for Footwear and the Japanese label Japan Eco Leather.

The requirement has been tightened since the previous generation of the criteria, with the introduction of a separate requirement level for products for children.

<sup>151</sup> EURATEX Recommendations Concerning Characteristics and Faults in Fabrics to be Used for Clothing.

### O85 Tear strength for skin and leather

Tear strength must be tested in accordance with ISO 3377 or equivalent and must be more than 20 N.

- Test report showing that the requirement is fulfilled.

#### **Background to the requirement**

The requirement has been set to ensure the good quality of the skin and leather, in terms of strength. The requirement refers to the standard ISO 3377-1 “Leather – Physical and mechanical tests – Determination of tear load – Part 1: Single edge tear”. The requirement remains unchanged from the previous generation.

### O86 Flexing test for leather

When testing leather’s flexing resistance, the leather shall manage 20,000 test repetitions (20 kc) without sustaining visible damage. The requirement only applies to leather with a surface coating.

Test method: The test must be performed in accordance with ISO 5402 or equivalent.

- Test report showing that the requirement is fulfilled.

#### **Background to the requirement**

The requirement has been set to ensure the good quality of the leather, in terms of its flexing resistance and how the surface finish is affected. The requirement refers to the standard ISO 5402 “Determination of flex resistance”.

### O87 Colour fastness to water - leather

Colour fastness when exposed to water shall be at least level 3 for leather that is dyed or has a surface finish.

Test method: The test shall be performed in accordance with ISO 11642 or equivalent.

- Test report showing that the requirement is fulfilled.

#### **Background to the requirement**

The requirement has been set to ensure as long a lifetime as possible for the leather, by requiring that dyed or finished leather has high colour fastness and low cross-staining when wet. The requirement refers to the standard ISO 11642 “Leather – Tests for colour fastness – Colour fastness to water”. Leather that has not been dyed or given a surface finish is exempted from the requirement.

### O88 Colour fastness to wear - leather

Colour fastness during wet and dry wear shall be at least level 3 for leather that is dyed or has a surface finish.

For vegetable tanned leather where no finishing is carried out, colour fastness is accepted for wet and dry wear of at least 2.

Test method: The test shall be performed in accordance with ISO 11640 or equivalent, with 20 repetitions for wet wear and 50 repetitions for dry wear. The results are to be assessed using ISO 105-A02 and ISO 105-A03 or equivalent.

- Test report showing that the requirement is fulfilled.

#### **Background to the requirement**

The requirement has been set to ensure as long a lifetime as possible for the leather, by requiring that dyed or finished leather has high colour fastness

during wear. The test describes how the surface of the leather is affected by dry and wet rubbing. ISO 11640: “Leather – Tests for colour fastness – Colour fastness to cycles of to-and-fro rubbing”.

### 5.15.3 Unsold textiles, skins, and leather

#### O89 Unsold textiles, skins, and leather

For the Nordic Swan Ecolabelled production, unsold textiles, fabric, skins, and leather and nonconformity productions shall not be sent for incineration or dumped in landfill.

The manufacturer shall inform Nordic Ecolabelling about how unsold products and nonconformity productions are dealt with.

##### **Exemption:**

- In cases where contamination of the product is detected, which is either harmful to the environment or health, the product is exempt from this requirement. It must be possible to document the contamination by a test report that is archived at the company.
- Uniforms for the military and police are also exempt from this requirement,

For the manufacturing licence, the requirement covers the company's Nordic Ecolabelled production until it is sold on to the next link in the value chain.

- Description of procedure for how unsold products and nonconformity productions are dealt with.

#### **Background to the requirement**

The requirement has been set to ensure that unsold textiles, skins and leather and nonconformity productions are used in the redesign of new products, sent for recycling, or donated to a charity. The aim of this is to achieve as great an environmental benefit as possible, despite the textiles not being sold for their intended purpose. The requirement also seeks to increase the focus on producing the “right” quantities and so avoiding overproduction.

In cases where contamination of the textile is detected, which is either harmful to the environment or health, the textile is exempt from this requirement. It must be possible to document the contamination by a test report, which is archived at the company and thus accessible by inspection from Nordic Ecolabelling.

For the manufacturing licence, the requirement covers the company's Nordic Ecolabelled production until it is sold on to the next link in the value chain.

## 5.16 Packaging, storage, and transport

#### O90 Chlorophenols, PCB and organotin compounds during transport and storage.

Chlorophenols (and salts and esters of chlorophenol), PCB (polychlorinated biphenyls) and organotin compounds shall not be used in connection with the transport or storage of products and semi-manufactures.

- Declaration from the suppliers at every stage of the production chain that these substances or compounds are not used in the yarn, fabric and/or end product or a valid licence certificate for the EU Ecolabel, issued in accordance with the Commission decision from 2014.

## Background to the requirement

The requirement that chlorophenols, PCB and organotin compounds must not be used during transport or storage includes the textile both before and after any finishing. These chemicals are sometimes used to prevent the textiles from being attacked by moths and other insects during storage and transport.

They are all chemicals that are harmful to health and the environment and are therefore not permitted.

Chlorophenols and salts and esters of chlorophenol are seldom used, but are considered to remain relevant, as certain suppliers may still use these biocides during transport and storage. Their use is not permitted in the EU, but they could still be applied to raw materials originating from outside the EU.

GOTS version 4 and the version 5 set the following requirement for storage and transport: "In cases where pesticides/biocides must be used in storerooms/transport means, they have to comply with the applicable international or national organic production standard." It is unclear, however, what this entails and how it is controlled. Textiles with GOTS certification must therefore also document this requirement.

### O91 Prohibition of PVC

PVC (polyvinyl chloride) must not be used in the packaging.

Declaration from the manufacturer of plastic material.

## Background to the requirement

Soft PVC (polyvinyl chloride) may contain softeners such as phthalates that may be reprotoxic or harmful to the environment. In addition to the risk of phthalates in soft PVC, the waste treatment of PVC is particularly problematic. This is due to the fact that incinerating 1 kg of PVC generates 0.4-1.7 kg flue gas treatment residues, which are sent to landfill. The volume depends on the type of incineration process used<sup>152</sup>. In Denmark, for example, attempts have been made to develop methods to process these flue gas treatment residues in order to recover the salts, particularly CaCl<sub>2</sub>, but this has not proven financially viable, according to ARC (Amager Resource Centre) in Denmark, which also reports that the hydrochloric acid formed on the combustion of the chlorine in PVC can corrode the installations and the chlorine can lead to the formation of dioxins and furans. Besides the waste phase, PVC is also environmentally problematic in other areas. PVC consists of approximately 57% industrially produced chlorine and approximately 43% fossil coal from oil or gas. The electrolysis process in PVC production, for example, releases toxic chlorine gas (Cl<sub>2</sub>). In Plastic Europe's Cl<sub>2</sub> Eco-profile, dioxin/furan emissions are stated as less than 1 mg for the production of 1 kg of chlorine. This is an average figure, however, so there is a risk of PVC/chlorine gas production with higher dioxin emissions than are stated here.

### O92 Recyclable packaging material

It shall be possible to recycle the main material\* in the primary packaging\*\* via the existing waste systems operating in the Nordic region today.

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<sup>152</sup> Memo: Ole Hjelm, DHI – Institute for Water and the Environment in 2002 Memo on mass flows on incineration of PVC.

Biodegradable and oxo-degradable plastic must not be used, since they contaminate the other recycled plastics streams in the Nordic region.

*\* The main material is defined as the material that makes up 90 weight% or more of the total packaging.*

*\*\* Primary packaging means the packaging that stays with the Nordic Swan Ecolabelled product all the way to the customer or individual packaging that accompanies the product to the retailer. Incineration with energy recovery does not count as material recycling.*

- ☒ Description of the main material in the packaging and how the material can be recycled in existing waste and resource systems.

## Background to the requirement

Recyclability is an important step in the transition to a circular economy. This provides an opportunity for materials to stay in the resource eco cycle, thereby reducing the use of virgin resources. The extent to which a material is recycled depends on many factors, such as the sorting options in each country or local authority, and how the consumer ultimately sorts the waste. However, Nordic Ecolabelling has an opportunity to promote the recycling of packaging by setting design requirements that support this process.

The main material in the packaging must be recyclable. The EU's action plan for a circular economy focuses on recovery and reuse, particularly with regard to packaging materials. Waste collection can either lead to a high level of material recycling, where valuable materials are returned to the economy, or to an inefficient system where recyclable waste largely ends up in landfill or is sent for incineration. The EU has drawn up a plastics strategy, which includes focusing on making the recycling of plastic more financially viable and working towards global solutions and standards that promote plastics recycling<sup>153</sup>.

Oxo-degradable and biodegradable plastics must not be used since they “contaminate” the other recycled plastics streams in the Nordic region. Bio-based plastic in PET, PE and PP can be recycled in the same way as fossil-based plastic in PET, PE, and PP.

### 093 Design of recyclable packaging

The requirement covers primary packaging\* for the Nordic Swan Ecolabelled product.

- Only monomaterials\*\* shall be used in the packaging. If various separate packaging elements are used, these may each be made of a separate monomaterials and shall be possible to separate in the waste sorting.
- Multi-material hangers are allowed if these are collected and reused in a textile manufacturer's take-back system.

#### Plastic packaging

- Plastic packaging shall be made from either polyethylene (PE), polypropylene (PP) or polyethylene terephthalate (PET).
- Coloured plastic cannot be used for virgin plastic feedstock. Only if at least 50% by weight of the plastic is recycled material\*\*\*, colouring is permitted.

<sup>153</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Closing the loop – An EU action plan for the Circular Economy, COM(2015) 614 final, <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52015DC0614>



*\* Primary packaging is defined here as packaging from the manufacturer that accompanies the product all the way to the store or the consumer. Delivery packaging used by online retailers is not considered to be primary packaging.*

*\*\* A monomaterial is defined as material components that are not composed of multiple material types. For example, the same plastic type and cardboard are monomaterials.*

*\*\*\* recycled material is defined as post-consumer/commercial recycled material defined in the requirement according to ISO 14021:2016:*

*“Post-consumer/commercial” is defined as material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.*

- ☒ Description of primary packaging documenting compliance with the requirement.
- ☒ Multi-material hangers: Textile manufacturer’s procedure, describing the take-back system for hangers.

## **Background to the requirement**

The requirement has been set to enable the best possible recycling of the material in the primary packaging.

In physical stores, textiles are usually sold without any primary packaging. However, this does not always mean that the product had no primary packaging during its distribution to the store. With online retailers, the product often remains in its primary packaging when dispatched to the store or the customer. The requirement is therefore not to encourage the use of packaging if it is not necessary. But primary packaging for textile products can ensure that the product is not damaged in transit, for example due to moisture, dirt, or cross-staining from other products. In relation to removing the primary packaging Patagonia has seen that polybags are critical to ensuring, that the garments stay clean from the finished goods factory through the transport to the consumer. Patagonia describes that if they eliminate the use of polybags, garments would be damaged, resulting in much higher environmental costs than the one from the polybag<sup>154</sup>.

The best way to ensure high quality recycling is to design the whole packaging in one material, so that individual parts of the packaging do not need to be separated out in the recycling process. Colour affects the recyclability of the packaging. Non-coloured or clear plastic packaging is preferred, because it has a wider range of recycling options than strongly coloured plastic. Colourless plastic has the highest recycling value. Dark colours result in darker recycled granules, which is not the preferred choice, and carbon black creates problems in most automated sorting systems, as the NIR (near infra-red reflectance) detector cannot identify dark colours produced using carbon black. Only colourless plastic is accepted unless it makes use of recycled plastic. If at least 50% by weight of the plastic packaging is recycled material, colouring is permitted.

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<sup>154</sup> Patagonia's Plastic Packaging: A Study on the Challenges of Garment Delivery  
<https://www.patagonia.com/stories/patagonias-plastic-packaging-a-study-on-the-challenges-of-garment-delivery/story-17927.html>



Typical contaminants that affect the recyclability of the plastic foil materials (like a polybag) would be paper labels<sup>155</sup>, adhesives and non-polyolefin plastics. This leads to contamination and to a limitation of the recyclability of the plastic<sup>156</sup>. Requirements for labels, however, have a low RPS, as soft plastic from packaging makes up a smaller proportion of the overall environmental impact from textiles. Therefore, there are no requirements for labels on packaging.

Biodegradable plastic is not suitable for today's recycling systems and can cause problems in the material recovery process for the recyclable types of plastic.

#### O94 Information on recycling

The packaging shall carry information on how it can be sorted for recycling. This information shall be stated using text or symbols.

- Product label or artwork providing information on recycling.

#### Background to the requirement

To stimulate the sorting of packaging for recycling, a new requirement has been added concerning the provision of guidance on the packaging about how it should be sorted for recycling. The waste stage is affected by many factors, such as the sorting options in each country or local authority, and how the consumer ultimately sorts the waste. However, Nordic Ecolabelling can generally encourage greater recycling of packaging by setting requirements that support recycling options.

## 5.17 Social and ethical requirements

#### O95 Mechanical and chemical distressing of denim

The following shall not be used:

- manual and mechanical sandblasting or sanding of denim.
- potassium permanganate (CAS no. 7722-64-7) for the treatment of denim fabrics/products, if used in open process.

- Declaration from the denim manufacturer stating the method used to treat the denim, plus a declaration that the requirement is fulfilled.

#### Background to the requirement

The requirement excludes the use of the treatments to achieve a pre-worn denim look that are most harmful to human health. The requirement is set to protect the health of the worker in the denim production.

#### Sandblasting and sanding

Both manual sandblasting and mechanical sandblasting can have major health impacts, since inhaling the sand (silica dust) can cause serious respiratory problems for workers; in cases of intense or prolonged exposure, it can lead to

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<sup>155</sup> [https://fashionforgood.com/wp-content/uploads/2019/12/FashionforGood\\_Polybags\\_in\\_the\\_Fashion\\_Industry\\_Whitepaper-1.pdf](https://fashionforgood.com/wp-content/uploads/2019/12/FashionforGood_Polybags_in_the_Fashion_Industry_Whitepaper-1.pdf)

<sup>156</sup> Verification and examination of recyclability 2017  
[https://sharepoint.nordicecolabel.org/ProductDevelopment/horizontalthemes/Shared%20Documents/Recyclability\\_certification\\_EU\\_2017.pdf](https://sharepoint.nordicecolabel.org/ProductDevelopment/horizontalthemes/Shared%20Documents/Recyclability_certification_EU_2017.pdf)

life-threatening illnesses such as lung cancer. Denim is sandblasted in order to achieve a pre-worn denim look.

Although several brands have promised to boycott sandblasting, studies such as those conducted for the report “Breathless for Blue Jeans: Health hazards in China’s denim factories” by The Clean Clothes Campaign in 2013 have shown that the denim industry in China and Bangladesh continues to use sandblasting. Manual or mechanical sanding is used as an alternative to sandblasting. There has not yet been any study into the long-term effects of sanding denim, but the processes also cause the air to be filled with dust from the denim fabric at levels that exceed recommended limits.

### **Potassium permanganate**

Other methods of achieving a worn look include laser effects, stone washing, water-based treatments, dye application and spraying with chemicals such as potassium permanganate. Potassium permanganate (also known as PP spray) is mainly used to lighten denim. The process involves spraying the chemical onto the denim fabric and then washing it off, leaving the treated area a lighter colour than the surrounding fabric. Workers spray the chemical onto the denim fabric with a hose or sometimes use a brush. The process exposes the worker to harmful inhalation of chemical vapour. The recommended method usually involves spraying the denim fabric in a closed and ventilated cubicle<sup>157</sup>. Potassium permanganate has been placed on the European Union’s Community Rolling Action Plan (CoRAP) list of substances<sup>158</sup>. A CoRAP report in 2018 concluded that the harmonised classification should be updated in 2020 to: Acute Tox 4\* classification – H302; Skin Corr. 1C – H314; STOT RE 2 – H373 (brain). The chemical therefore cannot be accepted used in an open process.

## **5.17.1 Fundamental principles and rights at work**

### **O96 Fundamental principles and rights at work**

Either requirement O96 or requirements O97-O103 must be fulfilled.

The licensee must ensure that all processes in the textile manufacturing and processing, such as; all dyeing plants, tanneries and cut-make-trim (CMT) factories (e.g. sewing factories) used in the manufacture of the licenced product(s) comply with:

- Relevant national laws and regulations
- The International Labour Organisation (ILO) Conventions below

#### **ILO Conventions:**

1. Prohibition of forced labour (ILO Conventions Nos. 29 and 105)
2. Freedom of association, and protection of the right to organise and to conduct collective bargaining (ILO Conventions Nos. 87, 98, 135 and 154)
3. Prohibition of child labour (ILO Conventions Nos. 138, 182 and 79 plus ILO Recommendation No. 146)

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<sup>157</sup> Breathless for Blue Jeans: Health hazards in China’s denim factories, The Clean Clothes Campaign 2013 <http://www.setem.org/media/pdfs/Breathless.pdf>

<sup>158</sup> SUBSTANCE EVALUATION CONCLUSION as required by REACH Article 48 and EVALUATION REPORT for Potassium permanganate 2018 <https://echa.europa.eu/documents/10162/f91eb21d-12bb-7a7a-9708-9534f87c3440>

4. No discrimination (ILO Conventions Nos. 100 and 111, UN Convention on the Elimination of All Forms of Discrimination against Women)
5. No violent treatment – Physical abuse or punishment, and threats of physical abuse are prohibited. The same applies to sexual or other forms of harassment.
6. Workplace health and safety (ILO Convention No. 155 and ILO Recommendation No. 164)
7. Fair pay (ILO Convention No. 131)
8. Working hours (ILO Conventions Nos.1 and 14)

**Certification at the manufacturing licence:** The licensee of the manufacturing licence shall submit either a valid certificate of a SA8000 certification, or other third-party verification of compliance with the requirement. This may be a BSCI audit report.

If the manufacturer is in the process of becoming SA8000 certified, this may be accepted under the following conditions: Final report from the certification body, including action plan with stated deadlines, submitted for assessment.

**Product licence:** The licensee of the production licence shall have following:

- A code of conduct with its subcontractors
- A publicly available policy adopted by the Board of Directors, which at least covers the social and ethical obligations that the requirement covers. At least one person at management level must be responsible for policy compliance.
- A routine for internal communication and regular follow-up of this policy in own company and in the supply chain.
- A routine for performing regular risk analysis to identify and prioritize the risk of non-compliance of the requirements and perform risk-reducing measures.

Nordic Ecolabelling may withdraw the ecolabel licence, if the licensee no longer fulfils SA8000 (or other corresponding certification) or does not meet the stated deadlines in any action plans.

- ☒ **Manufacturing licence:** SA8000 certificate or other third-party verification of compliance with the requirement incl. latest audit report e.g., a BSCI audit rapport.
- ☒ **Product licence:** Shall submit description of code of conduct, policy and routine as required by the requirement.

### Background to the requirement

The requirement refers to the UN's Universal Declaration of Human Rights<sup>159</sup>, which deals with respect for and the upholding of human rights, and the International Labour Organisation's (ILO) Conventions on relevant rights at work and OECD Due Diligence Guidance for Responsible Business Conduct. These are recognised and widely used frames of reference for businesses in their work on human rights and workers' rights, and they underpin most of the systems and guidelines that address human rights, such as the OECD, ISO 26000, SA8000, the UN Global Compact, the UN Guiding Principles, and the Ethical Trading Initiative.

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<sup>159</sup> <https://www.un.org/en/universal-declaration-human-rights/index.html>

A new report from April 2019, compiled by Human Rights Watch<sup>160</sup>, shows that low purchase prices and shorter lead times for textiles, combined with unfair sanctions and poor terms of payment, increase the risk of occupational accidents in textile factories. The severe financial pressure that many textile brands are putting their suppliers under gives those suppliers powerful incentives to cut costs in ways that worsen working conditions.

Many brands demand that their suppliers uphold key workers' rights, while at the same time pressuring and encouraging them to do the opposite. It is therefore considered relevant to expand the current requirement to include at least four new areas that are subject to ILO Conventions: "No violent treatment", "Workplace health and safety" (ILO Convention No. 155 and ILO Recommendation No. 164), Fair pay (ILO Convention No. 131) and Working hours (ILO Conventions Nos.1 and 14).

An SA8000 certificate with, for example, a BSCI audit report covers the ILO Conventions contained in the requirement<sup>161</sup>. A BSCI audit report may therefore be used as documentation for the requirement.

### **5.17.2 Mutual Human Rights Due Diligence obligations for Product Licensee and Manufacturing Licensee**

The requirements in this section are meant to prevent and address adverse impacts across the value chain of licensed products. The requirements are grounded in the authoritative international standards on human rights due diligence adopted by the UN and the OECD. These soft law standards are referenced in the draft EU directive on due diligence<sup>162</sup>.

The requirements are also in step with existing practice in the sector, including the risk-based approach to tackle the most salient human rights issues. Licensees are given a broad range of approaches to manage risk, and for the Nordic Ecolabelling to assess compliance, rather than a heavy reliance on contractual assurances and audits/verifications.

In the case of that there is only one licensee who covers both product and manufacturing, then the requirements described for both the Product licensee and the Manufacturing licensee must be fulfilled. In this case the "Manufacturing licensee" described in the requirements shall be interpreted as the "manufacturing site(s)" and the "Product licensee" as the "licensee".

#### **O97 Human Rights Due Diligence process**

Both the Product Licensee and the Manufacturing Licensee agree to establish and maintain a human rights due diligence process, appropriate to its size and circumstances, to identify, prevent, mitigate, and account for how each of the Licensees address the impact of its activities on the human rights of persons directly or indirectly affected by their value chains for licensed product(s).

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<sup>160</sup> "Paying for a Bus Ticket and Expecting to Fly" How Apparel Brand Purchasing Practices Drive Labor Abuses, 2019 [https://www.hrw.org/sites/default/files/report\\_pdf/wrd0419.pdf](https://www.hrw.org/sites/default/files/report_pdf/wrd0419.pdf)

<sup>161</sup> amfori BSCI Code of Conduct, [https://www.bsci-intl.org/sites/default/files/amfori%20BSCI%20COC%20UK\\_0.pdf?\\_ga=2.176261411.72067964.1557828371-2066962727.1556691248](https://www.bsci-intl.org/sites/default/files/amfori%20BSCI%20COC%20UK_0.pdf?_ga=2.176261411.72067964.1557828371-2066962727.1556691248) accessed 14.05.2019.

<sup>162</sup> [https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence\\_en](https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence_en)

The human rights due diligence process, towards ILO Conventions\* compliance, should be aligned to the methodology and expectations set out in the UN Guiding Principles on Business and Human Rights ('UN Guiding Principles')<sup>163</sup>, and with the OECD's Guidelines for Multinational Enterprises<sup>164</sup>.

*\* The Nordic Ecolabelling will for purpose of verification assess compliance with the ILO Core Labour Standards Conventions 029, 087, 098, 100, 105, 111, 155, 138, 182 and 187 at the dyeing plants, tanneries, and the cut-make-trim stage.*

*The Licensees shall, in good faith, take informed steps to implement due diligence by applying a risk-based approach, and be open and responsive to issues that may arise in its value chains, detailed in the following requirements.*

*See Appendix 4 for resources to develop a human rights due diligence process.*

- ☒ Signed application form.
- ☒ Nordic Ecolabelling may during the license period request from either Licensees copies of written efforts to engage, influence, support, reward and verify improvements at dyeing plants, tanneries, and at the cut-make-trim stage if needed, as per Compliance Action Plans (CAPs) from audits, certifications or multi-stakeholder initiatives or other social compliance and safety monitoring programmes.

## Background to the requirement

The due diligence requirement is supported by requirement O1, which asks for verified value chain mapping in production (dyeing plants and cut-make-trim (CMT) factories) and to connect the product with the actual raw material used.

The Nordic Ecolabelling aims to harmonise the social requirements in the criteria set with those of other ecolabelling schemes and proposed legislation in the internal market, see references below.

### International human rights standards and the shift from soft law to regulations

The human rights due diligence process requirement is aligned with the UN Guiding Principles, and in extension the OECD's Guidelines for Multinational Enterprises. The OECD Guidelines are clarified in plain-language explanations in the OECD Due Diligence Guidance for Responsible Business Conduct<sup>165</sup> to help promote a common understanding on due diligence compliant with that of the UN Guiding Principles.

The Guiding Principles were unanimously adopted by the UN Human Rights Council in June 2011. In line with the Guiding Principles, companies have a responsibility to undertake due diligence in their value chains to ensure respect for human rights. The human rights benchmarks are expressed in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work (which sets out the ILO core conventions). Companies are asked to employ ongoing risk-based due diligence to identify, prevent, and mitigate actual and potential adverse impacts on human rights based on its own activities, and those which may be directly linked to its operations, products, or services by its business relations. The UN Guiding

<sup>163</sup> United Nations Guiding Principles on Business and Human Rights ("UNGPs"), 2011, see [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)

<sup>164</sup> OECD Guidelines for Multinational Enterprises, 2011, see <https://www.oecd.org/corporate/mne/>

<sup>165</sup> OECD Due Diligence Guidance for Responsible Business Conduct ("OECD Due Diligence Guidance"), 2018, see <https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>

Principles expect companies to prioritize attention to the likely risk of severe harm (salient risks), to make it manageable.

In practice, some human rights may be at greater risk than others. Based on a risk approach and steerability (i.e., whether the Nordic Swan Ecolabel is the right instrument to tackle the issue), the Nordic Ecolabelling requires Licensees to be able to verify compliance with the ILO core labour standards at dyeing plants, tanneries, and cut-make-trim sites:

- 029 Forced Labour
- 087 Freedom of Association and Protection of the Right to Organise
- 098 Right to Organise and Collective Bargaining
- 100 Equal Remuneration
- 105 Abolition of Forced Labour
- 111 Discrimination (Employment and Occupation)
- 155 Occupational Safety and Health
- 138 Minimum Age Convention
- 183 Worst Forms of Child Labour

The EU Ecolabel asks for verification of the same ILO core labour standards at cut-make-trim sites<sup>166</sup>.

The verification requirement, further detailed in O100, means that in practice it is only allowed to source licensed products from countries or regions where it is possible to assess and monitor for respect for human rights, including labour rights. This excludes countries and regions where international bodies (including the EU), report to have high human rights risks (especially forced labour), and where social audits and assessments of sites are impossible or difficult.

The EU Commission's proposal for a Corporate Sustainability Due Diligence Directive (CSDDD)<sup>167</sup> references the UN Guiding Principles and the OECD guidance. The CSDDD takes a comprehensive approach and ties social aspects in the value chain with delivering on the EU's Green Deal<sup>168</sup>. The Directive aims to ensure coherence for companies and avoid fragmentation of due diligence requirements in the EU single market resulting from EU member states "acting on their own"<sup>169</sup>. It is meant to ensure a level playing field through a common set of rules in the internal market.

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<sup>166</sup> EU Ecolabel on Clothing and Textile Products, Commission Decision (EU) 2014/350 of 5 June 2014, see [https://environment.ec.europa.eu/topics/circular-economy/eu-ecolabel-home/product-groups-and-criteria/clothing-and-textiles\\_en](https://environment.ec.europa.eu/topics/circular-economy/eu-ecolabel-home/product-groups-and-criteria/clothing-and-textiles_en)

<sup>167</sup> Proposal for a Directive on Corporate Sustainability Due Diligence and Amending Directive (EU) 2019/1937, see [https://eur-lex.europa.eu/resource.html?uri=cellar:bc4dcea4-9584-11ec-b4e4-01aa75ed71a1.0001.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:bc4dcea4-9584-11ec-b4e4-01aa75ed71a1.0001.02/DOC_1&format=PDF)

<sup>168</sup> Communication from the Commission to the European Parliament the European Council, the Council, the European Economic and Social Committee and the Committee of the Region "The European Green Deal" (COM/2019/640 final), see <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2019%3A640%3AFIN>

<sup>169</sup> Proposal for a Directive on Corporate Sustainability Due Diligence and Amending Directive (EU) 2019/1937, see [https://eur-lex.europa.eu/resource.html?uri=cellar:bc4dcea4-9584-11ec-b4e4-01aa75ed71a1.0001.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:bc4dcea4-9584-11ec-b4e4-01aa75ed71a1.0001.02/DOC_1&format=PDF), see Explanatory Memorandum p. 3.



The threshold criteria for the CSDDD<sup>170</sup> remain a topic of discussion between the EU Parliament and the Council. While many companies will find themselves exempt from the Directive due to their size, their interactions with companies covered by the Directive will still have consequences; companies in-scope will pass the requirements throughout their value chains.

#### The performance documentation requirement during the license period

Reasonable assistance may include the need for the Licensee to either guide the supplier to trainings in how to improve, encourage the supplier to recognise and engage positively with trade unions or workers committees in social dialogue, and/or engage other buyers from the site to increase leverage to influence improvements in labour conditions, and/or improve the Licensees own purchasing practises so that e.g., last minute order modifications do not cause excessive work hours.

Human rights due diligence may include establishing, influencing and/or overseeing an existing or agreed-upon remediation plan that the Licensees put in place either at the outset or shortly after signing.

#### Scope of requirements limited by the public procurement directives

In accordance with the use of ecolabels in public procurement, the requirements cannot cover corporate policies in general that do not concern the product that's purchased.<sup>171</sup> The requirements are therefore formulated to the specific product and relevant to the subject of the contract.

Companies may, however, have difficulty in meeting the Nordic Swan Ecolabel requirements without these internal general policies and processes in place. Nordic Ecolabelling has therefore provided an extensive overview of useful resources and guidance for companies considering applying for a license in Appendix 4: Due Diligence Policy resources.

### **O98** Communicate and align on responsible business conduct

The Product Licensee shall inform suppliers what is expected of them, including a commitment to support supplier's compliance by engaging in responsible purchasing practices. The Product Licensee shall have a supplier code of conduct aligned with the UN Guiding Principles and the OECD Guidelines, see requirement O97.

For verification purposes, the Manufacturing Licensee must sign the Product Licensee's supplier code of conduct to reflect its acknowledgement and agreement to comply with the code.

In cases where the Manufacturing Licensee has adopted their own code of conduct, and the Product Licensee agree these are aligned with their own code, the Licensees may apply the principle of mutual recognition and accept the Manufacturing Licensee's code or policy as the labour and environmental standard governing the commercial relationship with the Product Licensee.

*See appendix 4 for model templates of supplier codes of conduct.*

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<sup>170</sup> Proposal for a Directive on Corporate Sustainability Due Diligence and Amending Directive (EU) 2019/1937, see [https://eur-lex.europa.eu/resource.html?uri=cellar:bc4dcea4-9584-11ec-b4e4-01aa75ed71a1.0001.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:bc4dcea4-9584-11ec-b4e4-01aa75ed71a1.0001.02/DOC_1&format=PDF), see p. 46.

<sup>171</sup> Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement, see <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32014L0024> Article 43.

- ☒ The Product Licensee must submit a version of its supplier code of conduct signed by the Manufacturing Licensee. Alternatively, if the principle of mutual recognition applies, the Product Licensee may submit a version of its code along with the Manufacturing Licence's own code or policy.

### **Background to the requirement**

See Appendix 4.

#### **O99 Preventive safety measure**

The Product Licensee shall commit to only source from production sites that participate in the International Accord for Health and Safety in the Textile and Garment Industry, where available.

Manufacturing Licensee with sites eligible to participate in the International Accord for Health and Safety in the Textile and Garment Industry will only have the sites accepted for production if they participate in the Accord.

- ☒ If relevant to source from sites in countries or regions covered by the Accord, both Licensees must submit a signed application form to join the International Accord.

### **Background to the requirement**

The International Accord for Health and Safety in the Textile and Garment Industry is currently active in Bangladesh and, since 2023, Pakistan under the name 'Pakistan Accord'.<sup>172</sup> Originally established as the 'Accord on Fire and Building Safety' in Bangladesh in 2013, this initiative works with the safety of production sites. Visit the Accord's website to check the safety status of these sites for free.

The catalyst for creating this Accord was the Rana Plaza building collapse in 2012, which highlighted the need for buyers to verify the safety of the buildings where their products are made. Assessing structural safety can be costly and generally falls outside the scope of social labour standard audits. The Accord emerged as a collaborative effort, sharing assessment costs among multiple buyers and suppliers. This initiative, led by trade unions alongside buyers, empowers workers to address safety concerns, especially when new heavy machinery is introduced, or safety conditions change.

### **5.17.3 Human Rights Due Diligence obligations specific to the Product Licence**

In the case of that there is only one licensee who covers both product and manufacturing, see section 5.17.2.

#### **O100 Assessment of safety and labour conditions**

The Product Licensee must conduct regular risk assessment of the value chain for the Licensed product. These assessments should be updated whenever significant new risks of adverse impact arise, at least every 12 months. The assessment should include:

- A desk-based assessment of the latest human right and environment-related context in the region or country, sector, and production type. This should also cover any indicators of risk at the sites, with a

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<sup>172</sup> See <https://internationalaccord.org/>



particular focus on forced labour/modern slavery and labour rights risks, especially those affecting migrant workers.

- Initial onsite assessment, to gather baseline data on the actual labour situation at dyeing plants, tanneries, and cut-make-trim site(s)\*.

The initial onsite assessment at these sites can be done through **either**:

- a) Reviewing a monitoring report from a recent (past 6 months) social assessment by a multi-stakeholder initiative programme\*\*;

**OR**

- b) Brand collaboration: If another buyer from the site(s) conducted a social audit within the past year, gain permission to be emailed a pdf copy of the audit report by the auditor or brand (not supplier), provided it meets the audit methodology, see below;

**OR**

- c) Commissioning a social audit. Nordic Ecolabelling will accept audits conducted using SLCP (Social and Labor Convergence Program) or SMETA (based on the ETI Base Code). SA8000 (first year) or a BSCI audit (first year) will be accepted if the report is provided in full (as well as the certificate for SA8000).

\* Exemption: If the desk-based assessment indicates low risk region or country, sector, production type and supplier risk, the initial onsite assessment can be made by reaching out to a relevant local trade union and/or women's group (unless the workforce is majority male) where these exists near sites, for an assessment of the on-site conditions and any necessary improvements. This should include a contact person at the Licensee, so that the trade union and/or women's group may engage if workers raise any concerns.

\*\* See Appendix 7 for approved programmes.

The results of the risk assessment shall be communicated internally to decision-makers. The results need to be considered during strategic decision-making and sourcing decisions.

*See Appendix 5 for resources for a desk-based assessment. See Appendix 6 for background and guidance on measures to verify compliance and respect for human rights onsite.*

- Submit the site(s) baseline assessment or monitoring report(s) of actual site labour conditions (options a-c above).
- If the exemption is applicable, submit a copy of the desk-based risk assessment together with verification of contact with a relevant trade union and/or women's group.

## **Background to the requirement**

The Licensee should assess their own potential contributions to adverse impacts, such as their purchasing practices, and determine whether there are sufficient incentives for suppliers to share, rather than hide, human rights issues.

### Salient risks at sites before production is initiated

If any salient human rights issues were found (child labour, forced labour indicators, coercion and harassment, discrimination, blocks on rights to freedom of association, serious health and safety issues, subcontracting, lack of transparency to auditors, no one day rest in seven, unpaid wages, no proper work hours/wages tracking, basic legal minimum wage not paid) by any of the baseline risk assessments, then the Licensee must influence improvement / remediation

for workers/affected persons, and then verify claimed improvements in follow-up audits. Until salient risks are verified remediated, the Licensee should not initiate production of Licensed product(s) with the Manufacturer or site.

#### **5.17.4 Human Rights Due Diligence obligations specific to the Manufacturing License**

In the case of that there is only one licensee who covers both product and manufacturing, see section 5.17.2.

##### **O101 Transparency and disclosure**

The Manufacturing Licensee shall ensure that all of its agents, subcontractors, consultants and any other personnel providing staffing for the production of licensed product(s) promptly and accurately disclose information relevant to the human rights due diligence process, as outlined in O97, to the Product Licensee. This includes the production locations for each product, including subcontracting activities such as printing, laundry, dyeing, embroidery, as well as any work conducted by homeworkers.

The Manufacturing Licensee shall inform the supplier site(s) that continuous improvement in labour conditions is acceptable. If a supplier site does not demonstrate transparency regarding labour conditions or show ongoing improvement efforts to address salient risks when needed, the Manufacturing Licensee shall reevaluate the continuation of their business relationship.

A site is subject to an immediate loss of authorization to produce Ecolabelled product(s) if any audit, report from a worker rights-focused monitoring entity or other source reveals instances of fraud (including “records could not be verified”, and “coached workers”), bribery, or other forms of improper influence.

Signed application form.

#### **Background to the requirement**

The Manufacturing Licensee shall ensure that all of its agents, subcontractors, consultants and any other personnel providing staffing for the production of licensed product(s) promptly and accurately disclose information relevant to the human rights due diligence process, as outlined in O97.

##### **O102 Collaborative initiatives**

To reduce duplication of monitoring and/or training efforts, and focus on site improvement, the Manufacturing Licensee must proactively notify the Product Licensee if another buyer from the same site recently conducted a social audit, or if it is engaged in training with another brand or participating in an approved multi-stakeholder initiative programme\*.

The Manufacturing Licensee must ensure reasonable access to the site, its workers and management for social audits, monitoring programmes, training sessions, or improvement engagement programmes.

\* See Appendix 7 for approved programmes.

Signed application form.

#### **Background to the requirement**

See Appendix 7.

## O103 Processes to enable remediation

The Manufacturing Licensee must ensure that its employees have access to an appropriate operational-level grievance mechanism\* to confidentially and without detriment raise labour-related disputes that may arise in the connection with the production of the Licensed product(s). The complaints procedure shall be in the native language or the predominant language of the site.

The grievance mechanism shall take into account any local agreements with trade unions that address collective grievances and labour-related disputes.

The Licensee shall effectively inform employees they are free to join functioning elected unions or, where local law restricts independent unions, worker committees. The Licensee shall reassure employees of their commitment to respect the right to join a trade union or workers' committee.

\* Exemption: Where the ILO Better Work programme is monitoring the site, operational-level grievance mechanism is not required as employees can contact the local BW office.

- ☒ Signed application form.
- ☒ To demonstrate that the operational-level grievance mechanism is functioning, provide semi-annual written reports to the Product Licensee describing, at a minimum, the number of grievances received and processed over the reporting period, documentary evidence of consultations with affected stakeholders, and all actions taken to address such grievances.

### Background to the requirement

It must be demonstrated that the employees have access to an appropriate operational-level grievance mechanism.

## 5.18 Quality and regulatory requirements

Quality and regulatory requirements are general requirements that are always included in Nordic Ecolabelling's product criteria. The purpose of these is to ensure that fundamental quality assurance and applicable environmental requirements from the authorities are dealt with appropriately. They also ensure compliance with Nordic Ecolabelling's requirements for the product throughout the period of validity of the licence.

These requirements have been expanded in this generation 4 with a new requirement regarding "Control and assessment of supplier".

## O104 Control and assessment of suppliers

The requirement includes both the product licence and a manufacturing licence.

The licensee shall submit an annual follow-up of its own subcontractors to Nordic Ecolabelling, which contain the following, as a minimum:

- Written documentation must be obtained annually showing that the responsible person at subcontractors who perform all, or part of the textile production is familiar with the Nordic Swan Ecolabelling's requirements for the relevant processes and understands how the supplier can ensure compliance with these.
- An annual confirmation shall be submitted describing that only subcontractor approved on the licence are used for the production of the Nordic Swan Ecolabelled textile. At the same time a list of the subcontractors used for the production of the Nordic Swan Ecolabelled textile shall be submitted.

Changes in the production such as replacement of subcontractors, fibre raw materials or chemicals shall be approved by Nordic Ecolabelling before the change is initiated in production. See requirement O101 Planned changes for procedure for this.

The licensee shall submit documentation stated in the requirement annually to Nordic Ecolabelling. Documentation for each year of the validity of the licence must be kept by the licensee.

- ☒ The licensee shall submit documentation annually showing that the subcontractor's responsible person is familiar with the relevant Nordic Swan Ecolabelling requirements.
- ☒ Licensee must annually submit confirmation that only subcontractors and raw materials approved for the licence are used. As well as provide a list of the subcontractors used.

### Background to the requirement

The requirement has been set to ensure that licence is in compliance with the actual production of the Nordic Swan Ecolabelled textile, skin and leather.

#### O105 Responsible person and organisation

The company (both the holder of the manufacturing licence and the holder of the product licence) shall appoint individuals who are responsible for ensuring the fulfilment of the Nordic Ecolabelling requirements, for marketing and for finance, as well as a contact person for communications with Nordic Ecolabelling.

- ☒ Organisational chart showing who is responsible for the above.

#### O106 Documentation

The licensee (both the manufacturing licence and the product licence) shall archive the documentation that is sent in with the application, or in a similar way maintain information in the Nordic Ecolabelling data system.

- 🔍 Checked on site, as necessary.

#### O107 Quality of the product

The licensee of the product licence shall guarantee that the quality of the Nordic Swan Ecolabelled product does not deteriorate during the validity period of the licence.

- ☒ Procedures for archiving claims and, where necessary, dealing with claims and complaints regarding the quality of the Nordic Swan Ecolabelled product.

- 🔍 The claims archive is checked on site.

#### O108 Planned changes

Written notice must be given to Nordic Ecolabelling of planned changes in products and markets, that have a bearing on Nordic Ecolabelling requirements.

- ☒ Procedures, of both the holder of the manufacturing licence and the holder of the product licence, detailing how planned changes in products and markets are handled.

#### O109 Unplanned nonconformities

The requirement includes both manufacturing licence and product licence. Unplanned nonconformities that have a bearing on Nordic Ecolabelling requirements must be reported to Nordic Ecolabelling in writing and journaled.

- ☒ Procedures detailing how unplanned nonconformities are handled.

## O110 Traceability

The licensee of the manufacturing licence must be able to trace the Nordic Swan Ecolabelled product in the production. A manufactured/sold product should be able to trace back to the occasion (time and date) and the location (specific factory) and, in relevant cases, also which machine/production line where it was produced. In addition, it should be possible to connect the product with the actual raw material used.

- Description of/procedures for the fulfilment of the requirement.

## O111 Legislation and regulations

The licensee (both the production licence and the product licence) shall ensure compliance with all applicable local laws and provisions at all production facilities for the Nordic Swan Ecolabelled product, e.g., with regard to safety, working environment, environmental legislation and site-specific terms/permits.

- Duly signed application form.

# 6 Changes compared to previous generation

The requirements in generation 4 for the production of virgin synthetic fibres such as acrylic polyester, elastane, polyamide and polypropylene are not included in generation 5 of the criteria. Instead, new requirements have been inserted stating that synthetic fibres must either be based on recycled or bio-based material. At the time environmental requirements are set for the biomass.

Overview of changes to criteria Nordic Swan Ecolabelled Textiles, hides/skins, and leather generation 5 compared with previous generation 4.

Requirement generation 5	Requirement generation 4	Same requirement	New requirement	Change
O1 Brand owner traceability			X	New requirement for brand owner - to achieve traceability of the Nordic Ecolabelled products on the market.
O2 Unsold textiles			X	New requirement for brand owner. Same requirement is set for the manufacturing licence.
O3 Information on reduced washing			X	New requirements for brand owner for encouraging consumers to reduce climate impact by washing only when necessary.
O4 Primary textile packaging			X	If the brand owner is responsible for the primary textile packaging, then refer to the requirements O84, O85, O86 and O87.
O8 Material limits	O2 Description and composition of the product	X	X	New requirement for embroidery thread. The previous requirement O2 is now divided into requirement O6, O8, O9, O10 and O11. See updated requirements for coatings and membranes (O43, O44 and O45).
O9 Smaller textile elements	O2 Description and composition of the product	X	X	For Oeko-Tex, a supplementary declaration of absence of fluorinated substances is now required. The previous requirement O2 is now divided into requirements O6, O8, O9, O10 and O11.

O12 Zippers, buttons, velcro, reflectors and other details	O23 Zippers, buttons, reflectors and other details	X		The requirement is tightened with a ban of details/accessories without practical function such as sequins, rivets, glitter.
O13 Re-design of re-used textiles, hides/skins, leather			X	New requirement that enables re-design. However, with restrictions on in which product types or requirements for previous certification.
<b>Fibre requirements</b>				
O14 Cotton fibre	O3 Cotton and other natural cellulose seed fibres	X		Cotton must be 100% organic or recycled. Only for selected textiles for professionals, alternative 100% certified fibres are accepted according to either BCI (Better Cotton Initiative), Fairtrade cotton or CMiA (Cotton Made in Africa).
O23-O27 Regenerated cellulose fibre		X		Regenerated cellulosic fibres must be based on recycled or FSC or PEFC certified fibres and the fibre production must be with "closed loop" technology if more than 30% by weight of fibre content in the fabric is cellulosic fibres. At less than 30%, there are strict requirements for emissions from the process.
O28 Synthetic fibre – fossil origin			X	Synthetic fibres must be based on either recycled or bio-based material. See detail in the requirement.
O29 Synthetic fibre – bio-based origin			X	Synthetic fibres must be based on either recycled or bio-based material. Also, requirements for the biomass material.
O30 Recycled fibres, test for harmful substances			X	New test requirements for specific unwanted chemicals in the recycled fibre.
O31 Treatment and coating of fibre and yarn			X	New requirement stating all requirements for treatment of fibres.
<b>Chemicals used in textile production</b>				
O33 Classification of chemical products	O31 Dyes, colorants, and pigments	X		The requirement has been tightened and now covers all chemicals used in textile production.
O34 Prohibition of CMR substances			X	The requirement has been tightened and now covers all chemicals used in textile production.
O35 Prohibited substances	O26 Forbidden substances and O25 Substances on the Reach candidate list	X		The requirement has been tightened and now covers all chemicals used in textile production. The two requirements are combined, and the list is updated with several extra substances.
O44 Raw material in the polymer (coatings/laminates/membranes)			X	The limitation on proportion of coating/laminate has been removed. Instead, the polymer (>5% by weight in textile product) must comply with requirements for either recycled or bio-based raw material.
O48 Implementation of BAT for energy	O63 Energy and water consumption	X		The requirement for energy and water consumption has been expanded with requirements for

efficiency and water savings				implementation of a minimum of BAT techniques to reduce energy and water consumption. This means that textile production must be water and energy efficient and thus achieve reduced CO2 emissions.
O49 Fibres in filling and stuffing materials			X	New requirements. Filling, stuffing material and fibre inserts are now covered by the same fibre requirements as the textile fabric.
<b>Skins and leather</b>				
O59 Chromium content in leather and hides/skins	O42 Chromium (VI)	X		The requirement has been extended to also include total chromium, with a requirement stating that the extractable chromium content in the finished skin or leather (incl. finishing) must be less than 200 mg / kg.
O62 Classification of chemical products	O45 Dyes and pigments for dyeing	X		The requirement has been extended to include all chemical products used in the production of hides and skins.
O63 Classification of ingoing substances in chemical products – skins and leather			X	New requirement for CMR classification at substance level.
O64 Prohibited substances– skins and leather	O41 Substances on the Reach candidate list and O44 Alkyl phenol ethoxylates and organic fluorine compounds	X		The two requirements have been merged. The requirement has been extended to include all chemical products used in the production of hides and skins and more substances are included of the list.
<b>Quality and performance</b>				
O69- O82 Quality and performance requirements for textiles	O68-O74 Quality and performance requirements for textiles	X	X	Here, both the existing requirements have been tightened and several new requirements have been introduced. For example, requirements on the textile's tear strength, seam strength, abrasion resistance and peeling. As well as a ban on fabricated holes.
<b>Recyclable packaging</b>				
O91 Recyclable packaging material			X	New requirement stating that the main material in the primary packaging must be recyclable in the existing waste and resource systems in the Nordic region today.
O92 Design of recyclable packaging			X	New requirements for packaging design – e.g., material separation and type of label material for the best possible recycling.
<b>Social and ethical requirements</b>				
O94 Mechanical and chemical distressing of denim			X	New requirement that prohibits the use of manual and mechanical sandblasting or sanding of denim.
O95 Fundamental principles and rights at work	O84 Working conditions	X		The requirement now includes several extra ILO conventions and has a stricter requirement for ensuring the implementation at the company and the supply chain.

## Criteria version history

Nordic Ecolabelling adopted version 5.0 of the criteria for Nordic Swan Ecolabelled Textiles, skins/hides, and leather on 15 November 2021. The criteria are valid from 1 March until 1 May 2026.

On 14 June and 6 September 2022 Nordic Ecolabelling decided to adjust requirement O70 regarding introduction of tests according to standard ISO/DIS 4484-1 and AATCC TM212. On the 14 June 2022 it was also decided to adjust requirement O14 by adding OCS 100 and OCS blended. On 23 August 2022 Nordic Ecolabelling decided to adjust requirement O13 by adding Leather standard by Oeko-Tex, requirement O29 by adding Bonsucro standard, and requirement O93 where requirements for labels on plastic packaging have been deleted. The new version is called 5.1.

On 18 April 2023 Nordic Ecolabelling decided to adjust requirement O57, where it was clarified that tests for 1,3-butadiene must only be carried out for synthetic latex. In addition, the product type rugs was removed from the criteria, as these product types are now covered by the criteria for Nordic Swan Ecolabelled textile floor coverings and carpets. The new version is called 5.2.

On 20 June 2023 Nordic Ecolabelling decided to adjust requirement O8, where embroidery area of a total of max. 50 cm<sup>2</sup> is exempt from the requirements. The new version is called 5.3.

On 14 November 2023 Nordic Ecolabelling decided to prolong the criteria to the 31 December 2026. The new version is called 5.4.

On 21 November 2023 Nordic Ecolabelling decided to adjust requirement O96 by adding the possibility to use new alternativ requirements O97 to O103 regarding Human Rights Due Diligence obligations. On 19 December 2023 Nordic Ecolabelling decided to adjust requirement O79 by allowing the textiles in dark colours have a colour fastness to wet rubbing of at least level 2-3. On 27 February 2024 Nordic Ecolabelling decided to adjust requirement O46 with an exemption for hot-melt polyurethane adhesive containing methylene diphenyl diisocyanate (MDI) to be used for water-proof bed sheets. The new version is called 5.5.



## Appendix 1                      Analysis and test laboratories

### **Requirements on the analysis laboratory (all)**

The analysis laboratory/test institute must be competent and impartial.

The analysis laboratory used shall fulfil the general requirements of standard EN ISO 17025 or have official GLP status.

The applicant's analysis laboratory/test procedure may be approved for analysis and testing if:

- sampling and analysis are monitored by the authorities, or
- the manufacturer's quality assurance system covers analyses and sampling and is certified to ISO 9001, or
- the manufacturer can demonstrate agreement between a first-time test conducted at the manufacturer's own laboratory and testing carried out in parallel at an independent test institute, and the manufacturer takes samples in accordance with a fixed sampling schedule.

### **Zinc**

Analytical methods for measuring the zinc content of wastewater: SS 28152 T1, NS 4773, SFS 3047, EN ISO 11885, EN ISO 15586 or ISO 17294-2. Analyses may be performed regularly using photometric or similar methods, provided that the analysis results are checked regularly and comply with the above methods of analysis.

Emissions of zinc to water are calculated as an annual average and based on at least one representative 24-hour sample per week unless the emission permit of the authorities prescribes some other method of calculation.

## Appendix 2 Azo dyes and aromatic amines

Carcinogene aromatic amines	CAS no
4-aminodiphenyl	92-67-1
Benzidine	92-87-5
4-chlor-o-toluidine	95-69-2
2-naphthylamine	91-59-8
o-amino-azotoluene	97-56-3
2-amino-4-nitrotoluene	99-55-8
p-chloraniline	106-47-8
2,4-diaminoanisol	615-05-4
4,4'-diaminodiphenylmethane	101-77-9
3,3'-dichlorbenzidine	91-94-1
3,3'-dimethoxybenzidine	119-90-4
3,3'-dimethylbenzidine	119-93-7
3,3'-dimethyl-4,4'-diaminodiphenylmethane	838-88-0
p-cresidine	120-71-8
4,4'-oxydianiline	101-80-4
4,4'-thiodianiline	139-65-1
o-toluidine	95-53-4
2,4-diaminotoluene	95-80-7
2,4,5-trimethylaniline	137-17-7
4-aminoazobenzene	60-09-3
o-anisidine	90-04-0
2,4-Xylidine	95-68-1
2,6-Xylidine	87-62-7
4,4'-methylene-bis-(2-chloro-aniline)	101-14-4
2-amino-5-nitroanisolet	97-52-9
m-nitroaniline	99-09-2
2-amino-4-nitrophenol	99-57-0
m-phenylenediamine	108-45-2
2-amino-5-nitrothiazole	121-66-4
2-amino-5-nitrophenol	121-88-0
p-aminophenol	123-30-80
p-phenetidine	156-43-4
2-methyl-pphenylenediamine; 2,5diaminotoluene	615-50-9
2-methyl-pphenylenediamine; 2,5diaminotoluene	95-70-5
2-methyl-pphenylenediamine; 2,5diaminotoluene	25376-45-8
6-chloro-2,4-dinitroaniline	3531-19-9

## Appendix 3 Guidelines for standard, renewable commodities

Nordic Ecolabelling sets requirements on the standards to which cultivated commodities are certified. These requirements are described below. Each individual national sustainability standard and each certification system is reviewed by Nordic Ecolabelling to ensure that the requirements are fulfilled.

### **Requirements on standards:**

- The standard must balance economic, ecological, and social interests and comply with the Rio Declaration's principles, Agenda 21 and the Forest Principles, and respect relevant international conventions and agreements.
- The standard must contain absolute requirements and promote and contribute towards sustainable cultivation. Nordic Ecolabelling places special emphasis on the standard including effective requirements and that the requirements protect the biodiversity.
- The standard must be available to the public. The standard must have been developed in an open process in which stakeholders with ecological, economic, and social interests have been invited to participate.

The requirements related to the sustainable standards are formulated as process requirements. The basis is that if stakeholders agree on the economic, social, and environmental aspects of the standard, this safeguards an acceptable requirement level.

If a sustainability standard is developed or approved by stakeholders with ecological, economic, and social interests, the standard may maintain an acceptable standard. Accordingly, Nordic Ecolabelling requires that the standard balances these three interests and that representatives from all three areas are invited to participate in development of the sustainable standard.

The standard must set absolute requirements that must be fulfilled for the certification. This ensures that the agriculture management fulfils an acceptable level regarding the environment. Since Nordic Ecolabelling requires that the standard must promote and contribute towards sustainable cultivation, the standard must be assessed and revised regularly for process improvement and successively reduce environmental impact.

### **Requirements on certification system**

- The certification system must be open, have significant national or international credibility and be able to verify that the requirements in the sustainable standard are fulfilled.

### **Requirements on certification body**

- The certification body must be independent, credible, and capable of verifying that the requirements of the standard have been fulfilled. The certification body must also be able to communicate the results and to facilitate the effective implementation of the standard.
- The certification system must be designed to verify that the requirements of the standard are fulfilled. The method used for certification must be repeatable and applicable so the requirements can be verified. Certification must be in respect to a specific sustainable standard. There must be inspection prior to certification.

### **Requirements on Chain of Custody (CoC) certification**

- Chain of Custody certification must be issued by an accredited, competent third party.

- The system shall stipulate requirements regarding the chain of custody that assure traceability, documentation, and controls throughout the production chain.

**Documentation:**

- Copy of cultivation standard, name, address, and telephone number to the
- organisation who has worked out the standard and audit reports.
- References to persons who represents stakeholders with ecological, economic
- and social interests who have been invited to participate.

Nordic Ecolabelling may request further documents to examine whether the requirements of the standard and certification system in question can be approved.

## Appendix 4 Due Diligence Policy resources

Many companies in the textile/apparel industry are part of multi-stakeholder initiatives (MSIs) that provide practical trainings and guidance on how to do human rights due diligence on value chains in the sector. These include the Ethical Tradin#g Initiatives (ETIs) of UK, Denmark, Norway and Sweden, Fair Wear Foundation (Dutch based), the amfori BSCI, the US based Social Accountability Intl (SA8000) and Fair Labour Association (FLA).

- For resources on responsible purchasing practices, see the Common Framework for Responsible Purchasing Practices (CFRPP, the Common Framework), available at <https://www.cfrpp.org/>, including a summary of available training, available at <https://static1.squarespace.com/static/601a4cf430876663b0f9c870/t/62de57432fbbd85a1ffca83a/1658738504465/Summary+training+LIC.pdf>.
- For specific guidance on how textile companies can undertake human rights due diligence, see the Fair Wear Foundation’s ”Brand Performance Check Guide”, available at <https://api.fairwear.org/wp-content/uploads/2022/05/Brand-performance-check-guide-2022.pdf> or see the ETIs website, available at <https://www.ethicaltrade.org/issuesdue-diligence/resources-human-rights-due-diligence>.
- For policy statement guidance and sectoral guidance, see OECD Due Diligence Guidance for garment and footwear, available at <https://mneguidelines.oecd.org/oecd-due-diligence-guidance-garment-footwear.pdf>, section 1.1. and 3.2.1 respectively.
- For a model template for a human rights policy, see Building Blocks for Schedule P, (P, as in Policy), available at [https://www.americanbar.org/content/dam/aba/administrative/human\\_rights/contractual-clauses-project/schedulep.pdf](https://www.americanbar.org/content/dam/aba/administrative/human_rights/contractual-clauses-project/schedulep.pdf), or, for practical examples, see Appendix B Examples of Policy Commitments to the 2016 report Doing Business with Respect for Human Rights: A Guidance Tool for Companies, by the Global Compact Network Netherlands, Oxfam and Shift, available at [https://shiftproject.org/wp-content/uploads/2020/01/business\\_respect\\_human\\_rights\\_full-1.pdf%20](https://shiftproject.org/wp-content/uploads/2020/01/business_respect_human_rights_full-1.pdf%20).
- For multilanguage versions of a supplier code of conduct, founded on the ILO Conventions, see the ETI Base Code, available at <https://www.ethicaltrade.org/resources/eti-base-code-poster>, see SAI (SA8000), available at <https://sa-intl.org/resources/sa8000-standard/sa8000-translations/>, or see Fairwear’s Code of Labour Practices (CoLP) <https://www.fairwear.org/about-us/labour-standards>.
- For a guide on identifying salient risks, see the 2017 UN Guiding Principles Reporting Framework, a collaboration between the Shift Project (the leading centre of expertise on the UN Guiding Principles) and the international accounting firm, Mazars LLP, available at <https://www.ungpreporting.org/>.
- For guidance on how to calculate and benchmark wages, see the Anker methodology, available at <https://globallivingwage.org/about/anker-methodology/>, or see the Asia Floor Wage, available at <https://asia.floorwage.org/living-wage/calculating-a-living-wage/>, or use a process such as ACT membership, Fair Wear Foundation Fair Wage Ladder, Fairtrade Textile Standard, or FLA’s Fair Compensation Scheme.

## Appendix 5 Human rights and environmental risk assessments

### Assess the country and sector risk

Licensees are asked to assess the latest human rights and environment-related context, to consider whether compliance with the fundamental ILO conventions (and assessing for that) at the sites is possible.

- For an overview of ratifications by country of fundamental ILO Conventions, see <https://www.ilo.org/dyn/normlex/en/f?p=1000:11001::NO:::>. For example consult the list of countries that have not ratified the Convention No. 98 concerning right to organise and collective bargaining, see [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11310:0::NO:11310:P11310\\_INSTRUMENT\\_ID:312243:NO](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11310:0::NO:11310:P11310_INSTRUMENT_ID:312243:NO), and see overview of ratifications of fundamental instruments by number of ratifications, available at [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:10011:0::NO::P10011\\_DISPLAY\\_BY,P10011\\_CONVENTION\\_TYPE\\_CODE:2,F](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:10011:0::NO::P10011_DISPLAY_BY,P10011_CONVENTION_TYPE_CODE:2,F).
- For a rank of countries' respect for workers' rights, see the latest edition of the International Trade Union Confederation Global Rights Index, available at <https://www.ituc-csi.org/2022-global-rights-index-en>.
- For country-specific human rights reviews, see Human Rights Watch's reports, available at <https://www.hrw.org/countries>, and see Amnesty Internationals' reports, available at <https://www.amnesty.org/en/countries/>.
- For updates with focus on textile and apparel manufacturing, see FairWear Foundations' country reports, available at <https://www.fairwear.org/programmes/countries> and see ETI's country risk reports, available at <https://www.ethicaltrade.org/blog>. ILO Better Work has occasional country apparel sector labour conditions reports, available at <https://betterwork.org/>
- For resources on modern slavery risks, see the US State Department and Verité's responsible sourcing tool, available at <https://www.responsible sourcing tool.org/workerprotection>, see the US Department of Labor's list of goods and their source countries which it is reason to believe is produced by child labour or forced labour, available at <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>; see the US State Department's yearly Trafficking in Persons Report, available at <https://www.state.gov/reports/2022trafficking-in-persons-report/>; see the International Organisation for Migration (IOM) global data hub on human trafficking, available at <https://www.ctdatacollaborative.org/>, and the most recent global and regional estimates on forced labour, including high risk countries and regions on pp. 52-57, available at [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---ipec/documents/publication/wcms\\_854733.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf).
- For proposed legislation to prohibit products made with forced labour from the EU market, see the European Commission, Proposal for a regulation of the European Parliament of the Council on prohibiting products made with forced labour on the Union market, 14 September 2022, available at

[https://ec.europa.eu/transparency/documents-register/api/files/COM\(2022\)453\\_0/090166e5f14084e6?rendition=false](https://ec.europa.eu/transparency/documents-register/api/files/COM(2022)453_0/090166e5f14084e6?rendition=false), and the issued guidance p. 5 on country risk factors for forced labour, available at [https://trade.ec.europa.eu/doclib/docs/2021/july/tradoc\\_159709.pdf](https://trade.ec.europa.eu/doclib/docs/2021/july/tradoc_159709.pdf)

- For US restrictions on supply chains and investment links to Xinjiang, China, see the Uyghur Forced Labor Prevention Act, available at <https://www.cbp.gov/trade/forced-labor/UFLPA>, and see the US State Department's Xinjiang Supply Chain Business Advisory, available at <https://www.state.gov/xinjiang-supply-chain-business-advisory/>.
- For datasets summarising views on the quality of governance of countries, see the Worldwide Governance Indicators, available at <http://info.worldbank.org/governance/wgi>

### Assess the supplier risk

- This guide lists sector MSI resources you can use for free:
- Licensees can engage trade unions in their home country or in a sourcing country to ask about working conditions, and if there have been any reports of human rights issues from the sourcing supplier.
- Licensees can check if other brands or MSIs are buying from, and hence may be social auditing, assessing or training factories in labour standards and open to brand collaboration, by checking the Open Apparel Registry/Open Supply Hub, available at <https://staging.openapparel.org/> and <https://opensupplyhub.org>.
- Some larger suppliers may also be found in the Business Human Rights Resource Centre database search engine of companies, available at <https://www.business-humanrights.org/en/companies/>.
- For factories over 100 employees, check if a supplier already has an update on the Social Labour Convergence Programme (SCLP) data collection tool, available at <https://slcp.zendesk.com/hc/en-us/articles/360023740474-Data-Collection-Tool-1-4>.
- For sites in countries covered by the ILO Better Work programme, consult the Transparency Portal to verify that the factory has no outstanding salient risks of harm, available at <https://portal.betterwork.org/transparency/compliance>
- For China, consult the China Labour Bulletin, available at <https://clb.org.hk/>, and the Australian Strategic Policy Institute report website, available at <https://www.aspi.org.au/report/uyghurs-sale>, to verify that the factory is not reported for conditions that strongly suggest forced labour.
- In general, consult Worker Rights Consortium, available at <https://www.workersrights.org/our-work/factory-investigations/>, and manufacturing assessments by Fair Labour Association (FLA), available at [https://www.fairlabor.org/accountability/assessments/assessments-manufacturing/?report\\_type=workplace-monitoring%7Cthird-party-complaint](https://www.fairlabor.org/accountability/assessments/assessments-manufacturing/?report_type=workplace-monitoring%7Cthird-party-complaint), to see if the supplier site(s) are listed. FLA ongoingly report on breaches of workers' rights under the ILO conventions.
- If a factory indicates it has SA8000 certification, this can be checked at <https://sa-intl.org/sa8000-search/>. SAI have indicated they are launching a Buyer Engagement Tool, whereby buyers can see issues found, and be

supported to engage the supplier to help influence and reward remediation improvements needed.

- For emissions data from 70 000+ individual sources and countries, see the Climate Trace database, available at <http://www.climatetrace.org/map>
- For environmental risk, see the pollution databases (water and air) of the Institute of Public and Environmental Affairs (IPA) for relevant Asia sites, available at [http://wwen.ipe.org.cn/AirMap\\_fxy/AirMap.html?q=1](http://wwen.ipe.org.cn/AirMap_fxy/AirMap.html?q=1).

### **Workforce profile of supplier site(s)**

Licensees are advised to gather employment site details as part of an initial desk-based assessment of vendor or site risks, with

- Numbers of workers, and % line workers, including
- Numbers and sources of any foreign migrant or contract workers, or in large countries, i.e., China and India, domestic migrants, and
- The languages spoken on site with by how many employees
- Gender breakdown
- About unions active onsite.

If the site has migrant workers (domestic or foreign), heightened due diligence (including consulting experts such as MSIs listed above) and monitoring, will be needed.

### **Useful resources:**

- Current good practice is to follow guidance from the Transparency Pledge, available at <https://transparencypledge.org/>, and disclose supply chain information at the open Data Standard, available at <https://odsas.org/>



## Appendix 6 Measures to verify compliance/human rights at sites

To avoid unnecessary costs, and varying audit quality and the failure to resolve systemic issues, the Nordic Swan Ecolabel encourages Licensees to take part in multi-stakeholder initiatives (MSIs) that guides improvements and deliver ongoing monitoring and collaboration.

Where MSIs are not easily available, suppliers assessed for labour standards might have been audited frequently, also some may have engaged in improvement trainings or initiatives. To help reduce duplicative audit fatigue, or even training fatigue, check if sites have had recent trainings or ongoing programmes.

If another buyer has recently assessed the site, consider brand collaboration to reduce duplication. Suppliers have an incentive to help with contact between buyers, as company resources would be saved with social compliance monitoring. Also sharing audit reports with other brands can influence supplier improvements on salient risks. Other shared benefits include verification funding for follow-up audits using all buyer codes. It could also be possible to fund an independent worker helpline service or jointly promote and deliver trainings.

The Nordic Swan Ecolabel asks Licensees to only commission or accept brand collaboration on social audits that follow the audit methodology in requirement O100 Assessment of safety and labour conditions' and be aware of the shortcomings with audits, listed below.

### **Resources on the growing consensus of ineffectiveness of private regulation:**

See Research Brief by Cornell University's School of Industrial and Labor Relations on unreliable data in audits, <https://theconversation.com/why-apparel-brands-efforts-to-police-their-supply-chains-arent-working-136821> and <https://cornell.app.box.com/s/swgaexrjs1bne4tk4magraf14894hpr7>. Researchers found that over 50% of the 31,652 factory audits conducted in China and India over a seven-year period were based on falsified or unreliable information.

Another investigation by South China Morning, see [https://www.scmp.com/economy/china-economy/article/3118683/bribes-fake-factories-and-forged-documents-buccaneering?module=perpetual\\_scroll\\_0&pgtype=article&campaign=3118683](https://www.scmp.com/economy/china-economy/article/3118683/bribes-fake-factories-and-forged-documents-buccaneering?module=perpetual_scroll_0&pgtype=article&campaign=3118683), shows that more than 90 percent of factories audited on the amfori BSCI platform in 2020 had falsified records.

Also Human Rights Watch comment on insufficient third-party auditing for human rights issues, at <https://www.hrw.org/report/2016/05/30/human-rights-supply-chains/call-binding-global-standard-due-diligence>; also <https://www.hrw.org/news/2020/10/07/social-audit-reforms-and-labor-rights-ruse>, also <https://www.hrw.org/news/2018/10/08/germany-paved-way-revamping-social-audits-italy-should-follow>, and there are limits with audits to detect sexual harassment and other gender-based violence, including limitations of on-site interviews - <https://www.hrw.org/news/2019/02/12/combating-sexual-harassment-garment-industry>.

The SA8000 standard provides guidance on delivering good working conditions, and there are various SAI run programmes to assist factory learning and improvement. However, research has shown social certification programmes can cause sites to not disclose the true status of human rights conditions.

Suppliers who genuinely gain high standards certifications such as SA8000 should be rewarded. However, certification as a business requirement for a large deal, may place greater stress on supply chain partners and lower the chances of buyer awareness of any adverse human rights impacts of social compliance. There have been alleged risks of falsification of these certificates and corruption. See the 2018 article SA8000: The “Gold Standard” for Failing Workers? by the Worker-Driven Social Responsibility Network, on SAI’s SA8000 certification programme, available at <https://wsr-network.org/resource/sa8000-the-gold-standard-for-failing-workers/>. It goes through studies showing lack of empirical evidence to support that SAI and SA8000 deliver meaningful change for workers in global supply chains. It states SA8000 is seen as ineffective due to its “voluntary compliance, dependence on flawed social audits, failure to address price pressure, and lack of worker participation.” Better mechanisms with binding and enforceable agreements between worker organizations and global corporations, e.g., the International Accord, is needed.

Programmes such as ILO Better Work with its extensive factory training calendar acknowledge that many factories don’t know how to fix all problems identified. Collaboration is needed.

## Appendix 7 Approved multi-stakeholder initiative (MSIs) programmes

The Nordic Swan Ecolabel asks Licensees to use approved multi-stakeholder initiative programmes, brand collaboration on audit/report sharing, or commissioning a social audit for baseline assessments of sites.

### Approved multi-stakeholder initiative (MSI) programmes:

- If the site participates in the ILO Better Work programme or has SA8000 certification, the Licensee should purchase the Better Work or SA8000 monitoring access, see <https://sa-intl.org/>, and use this to first assess and engage the supplier on compliance, then after approval, review reports of their compliance monitoring visits, and engage as needed towards sustained compliance.

ILO Better Work run country programmes in Bangladesh, Cambodia, Egypt, Ethiopia, Haiti, Indonesia, Jordan, Nicaragua, Pakistan, and Vietnam. The programme provides long-term support of worker rights and transparent ongoing monitoring of factories, by building local government capacity in labour standards monitoring, see <https://betterwork.org/>

SA8000 or other certification of labour conditions is not discouraged but should only be accepted as supplier assessment as part of the requirements to take appropriate measures to identify actual and potential adverse human rights impacts arising from supply chains\*.

*\* For background, see Appendix C Measures to verify compliance/human rights at sites.*

- If the site has in the past year been audited by a Fair Wear or Fair Labor Association member, then the Licensee is encouraged to request social audit report sharing, to align any needed non-compliance remediation (i.e. brand collaboration).
- If a factory is in the Fairtrade Textile Programme, the Licensee should gain site social assessment report from Fairtrade, see <https://www.fairtrade.net/about/the-fairtrade-textile-programme>.
- For factories with over 100 employees, the Licensee should check if the supplier already has had an assessment in the past year per the Social Labour Convergence Programme data collection tool, available at <https://slcp.zendesk.com/hc/en-us/articles/360023740474-Data-Collection-Tool-1-4>. If yes, the Licensee needs access to reduce social audit duplication. The SLCP and Sustainable Apparel Coalition (SAC) also coordinate assessment of support facilities such as sub-contracted laundries, printing, embroidery, etc. See <https://openapparel.org/> to find sites already assessed by SAC standards (search in contributor “Higgs”).
- As BSCI, Sedex and WRAP do not have worker representative leadership, the Licensee can use a social audit to BSCI or Sedex or WRAP standard from the past year if additional monitoring is initiated, such as to use a relevant

trade union in the country or region to report worker issues and/or a locally run independent worker helpline service that reports to the Licensee.

- For apparel factories in Leicester, UK, assessments by Fast Forward will be accepted.

Some factories may run under other monitoring and improvement programmes by ILO Score, Impactt, Verite, ReAssurance, or other dedicated experts on labour conditions.

Licensees who wish to have these or other labour standards improvement programmes or partners considered, should find out which buyer introduced these, if they can gain access to the programme reports and support them. However, please contact Nordic Ecolabelling to ensure that this can be approved.