



Detailed Feedback

OEKO-TEX® Public Stakeholder Consultation

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OEKO-TEX®

**International Association for Research and Testing in
the Field of Textile and Leather Ecology**

Internationale Gemeinschaft für Forschung und Prüfung
auf dem Gebiet der Textil- und Lederökologie

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II. Updates 2022

1.1. RSL

a) Are there chemicals that you would want to see on the OEKO-TEX® RSL? Which ones and why?

Feedback received	Comments
REACTIVE COLORS, EVERY INDUSTRY TEXTILE USED COLORS REACTIVE	Reactive dyes have a certain allergenic potential as dyes, but this is no longer present after they have reacted, after a covalent bonding to fiber material. Reactive colours are part of the manufacturing audit of the OEKO-TEX® STeP certification, but is not within the scope of OEKO-TEX® STANDARD 100 or OEKO-TEX® LEATHER STANDARD RSL, as the topic is related to process control and not product control. Therefore, no new reactive dyes will be included in 2023.
Its good.	Thank you for the valuable comment.
No	Thank you for the valuable comment.
No, I have no additions to add.	Thank you for the valuable comment.
No	Thank you for the valuable comment.
No	Thank you for the valuable comment.
No question	Thank you for the valuable comment.
Dioxine / Furanes / PCB On Baby diapers it's becoming a focus especially in France (ANSES report)	For the dioxins, furanes and PCB we had been tracking the ANES report as well and understand the concern. However, since ECHA has reached the conclusion, not to add the substances for further control we will not be adding the substances to our RSL but will be keeping a close call on any upcoming legislation.
Maybe Aziridine crosslinker, its harmful for production employees. Yes, it's amongst the best products for our products.	While aziridine does have two relevant toxicities (H340 & H350) the product, however CO2 in the air is enough for it to polymerize. Since it is very reactive it is also no longer found on the products. Aziridine crosslinker are already covered in the manufacturing audit of the OEKO-TEX® STeP certification but is not within the scope of OEKO-TEX® STANDARD 100 or OEKO-TEX® LEATHER STANDARD RSL, as the topic is related to process control and not product control. Therefore, we will not include aziridine crosslinkers in 2023.
No	Thank you for the valuable comment.
No	Thank you for the valuable comment.
I don't know they are in the list, I'm going to do a research about certified d chemicals and/or company that are certified	We appreciate your efforts. If you have any results of your research that you would like to share with us, please feel free to reach out to us. You can find our contact information on the OEKO-TEX® website: OEKO-TEX® Contact us!

b) Are there parameters or limit values you have questions about? Which ones and why?

Feedback received	Comments
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NO	Thank you for the valuable comment.
We trust on the applied criteria.	Thank you for the valuable comment.
no	Thank you for the valuable comment.
NO	Thank you for the valuable comment.
Organotins limit can be lower (EDANA agreement ppb)	The limit for organic tin compounds is under revision by OEKO-TEX® and will be brought to a final decision in Q2/Q3 of 2023
no	Thank you for the valuable comment.
No question	Thank you for the valuable comment.
Crocktest for window covering products: why such high values for a fabric you do not touch?	Assessing each product individually and providing own limit values would be too complex. Furthermore, it is difficult to predetermine the exact use of the product. Therefore, we must treat them as worst-case scenarios. We will stay with a general limit in our RSL.
no	Thank you for the valuable comment.
No	Thank you for the valuable comment.
<p>PH values for post-consumer textiles. We see in many cases a PH between 7.5 and 8. Probably due to detergents from washing by consumers...if this limit value is kept, we foresee many problems in certifying post-consumer recycled textiles (mechanical).</p> <p>NPEO limit values. There is an exemption in REACH for NPEOs in post-consumer textiles in some cases. Because they are expected to wash out? In any case we see NPEOs come up in post-consumer textiles from US because there they are not banned and still in many laundry detergents.</p> <p>In general, these two cases point at the problem for post-consumer textiles. With OEKO-TEX® certification the production of textiles can be controlled, and certain products banned by suppliers that follow OEKO-TEX® RSL/MRSL. But how does the consumer fit it? If there are still detergents on the market that affect certain parameters there is no way to control that now. Also...we can see old items that have chemicals that weren't banned before (but are now). I urge OEKO-TEX® to look further into this to enable best possible protocol to certify post-consumer</p>	<p>OEKO-TEX® believes that consumer safety is most important. This implies that recycled articles should never contain harmful substances in larger concentrations compared to virgin certified articles. OEKO-TEX® is always open for discussion and the topic of recycled materials will be further developed within OEKO-TEX®. Recycled materials must respect the same limit values to get the OEKO-TEX® STANDARD 100 label as new articles. As such, OEKO-TEX® STANDARD 100 recycled articles will be tested for harmful substances that are banned today.</p>

1.2. MRSL

a) Are there additional chemicals that you would want to see on the OEKO-TEX® MRSL? Which ones and why?

Feedback received	Comments
NO	Thank you for the valuable comment.
No mayor comments	Thank you for the valuable comment.



no	Thank you for the valuable comment.
no	Thank you for the valuable comment.
NO	Thank you for the valuable comment.
No comments	Thank you for the valuable comment.
No	Thank you for the valuable comment.
No	Thank you for the valuable comment.
no	Thank you for the valuable comment.
No	Thank you for the valuable comment.

b) Are there **parameters** or **limit values** you have questions about? Which ones and why?

Feedback received	Comments
NO	Thank you for the valuable comment.
No mayor comments	Thank you for the valuable comment.
no	Thank you for the valuable comment.
NO	Thank you for the valuable comment.
No comments	Thank you for the valuable comment.
No	Thank you for the valuable comment.
NO	Thank you for the valuable comment.
NO	Thank you for the valuable comment.
no	Thank you for the valuable comment.
NO	Thank you for the valuable comment.

1.3. Do you have any other questions or comments concerning the OEKO-TEX® RSL / MRSL?

Feedback received	Comments
NO	Thank you for the valuable comment.
No mayor comments	Thank you for the valuable comment.
no	Thank you for the valuable comment.



It would be very helpful if there will be a version update list in which clearly stated with every version what the implanted changes are	We are providing dossiers with new regulations for each standard on an annual base. Please find the new regulation for 2023 under the following link: OEKO-TEX® New regulations 2023
NO	Thank you for the valuable comment.
no	Thank you for the valuable comment.
no	Thank you for the valuable comment.
No	Thank you for the valuable comment.
no	Thank you for the valuable comment.
<p>Testing frequency for recycled should be considered. Especially for post-consumer recycled (mechanical) textiles. These raw material inputs will be so different batch to batch that it seems unlikely that testing 2x per year really provides a protection or guarantee. There needs to be a robust in-house testing protocol (chemical management protocol makes no sense for recycled materials as we ourselves do not add chemicals, any chemicals that can a problem are already there in the feedstock) in addition to OEKO-TEX® to ensure safety. Also, it seems raw material suppliers cannot get certified (supplier if post-consumer garments to us), why not? This is the first step for the new chain, how to make sure controls are also i place at this stage?</p> <p>Then what does OEKO-TEX® certification say to the industry? Does it guarantee anything? does it provide any real safety / security also in case of problems or claims? Testing only twice a year means that easily batches can be sold that have some kind of problem, OEKO-TEX® certification in that case might bring a false safety to downstream suppliers. If a problem occurs, who is responsible? Does OEKO-TEX® bare any responsibility because they have given their stamp of approval?</p>	<p>Part of the OEKO-TEX® STANDARD 100 certification requirements is an internal quality assurance of the facility For post-consumer materials testing through the OEKO-TEX® testing institutes twice a year is mandatory. In addition, for post-consumer recycled materials it is the responsibility of the facility to ensure a constant quality of the fibres and to proof that to the OEKO-TEX® testing institutes.</p> <p>OEKO-TEX® STANDARD 100 stands for “tested for harmful substances” and therefore safe to use. As mentioned above, the internal quality control of each facility has the responsibility to ensure a constant quality. The OEKO-TEX® testing institutes provide additional external testing to ensure safety and trust. This is supported additionally by many internal quality assurance mechanisms like control tests on 25% of the issued certificates, round robin tests, audits, etc.</p>

1.4.1. Have you ever calculated your environmental impact like carbon footprint or water footprint?

The 142 stakeholders who participated gave the following answers:

	Personal carbon footprint	Company carbon footprint	Personal water footprint	Company water footprint
Yes	5	13	4	10
No	46	38	47	41
N/A	90	90	90	90



1.4.2. How important is carbon and water footprinting for you (and your business)?

	Personal carbon footprint	Company carbon footprint	Personal water footprint	Company water footprint
Not important	2	2	8	6
Hardly important	2	2	12	11
Neutral	4	3	3	3
Important	13	12	2	1
Very important	3	6	1	4
N/A	117	116	115	116

1.4.3. Have a look at our "Impact calculator" - what would be the most important step for you for future development?

Feedback received	Comments
Specific recommendations for actions based on aggregated data. A whitepaper about the results.	Thank you for the valuable comment. We will take this into consideration for future developments.
We have several projects to reduce impact, with energy reduction & water efficiency projects. So an impact calculator is a useful tool. It needs to be easy and practical	Thank you for the valuable comment.
Creating a standard on chemical usage, soil usage would complete the evaluation in our opinion. Also, the overall environmental footprint during the product would be very interesting to standardize.	Thank you for the valuable comment. We will take this into consideration for potential future developments or collaborations.
CO2 footprint	Thank you for the valuable comment. We agree with this aspect. Therefore, we considered amongst the water usage also the carbon emissions in the development of the impact Calculator.
For the moment I didn't use it. I have to look for it.	Thank you for the valuable comment. If you are interested in more information about the Impact Calculator, please follow the link: Your Carbon and Water Footprint (oeko-tex.com)
we are always trying to be involved with the environment and sustainability of the whole supply chain. We are following a very strong policy.	This sounds great. We support this ambition of continuous supply chain involvement.
Further improving efficiency. We are a small company, but have big ambitions. Maybe a consult if its mandatory for a small company like us.	The Impact Calculator is applicable for any type and size of manufacturing facility. The actions to be taken based on the results of the impact calculator vary from company to company. Therefore, OEKO-TEX® does not provide specific actions but motivates the company to design a corrective action plan with measures that will benefit our environment and the business of the company.
not yet	If you are interested in more information about the Impact Calculator, please follow the link: Your Carbon and Water Footprint (oeko-tex.com)



We will start with LCA's.	This is great. If you are interested in more information about the Impact Calculator, please follow the link: Your Carbon and Water Footprint (oeko-tex.com)
no	If you are interested in more information about the Impact Calculator, please follow the link: Your Carbon and Water Footprint (oeko-tex.com)
didnt look. We have our own calculator tool.	It is great you are already calculating your emissions. Feel free to use the Impact Calculator. You might find valuable insights in how the Impact Calculator works. Also feedback for future improvements is highly appreciated.
to link the emission figures to a made in green product	Thank you for the valuable comment. We will take this into consideration for future developments.



III. Product Development

2.1. OEKO-TEX® RESPONSIBLE BUSINESS

a) What do you expect from such a service?

Feedback received	Comments
Global legal compliance (so, NYC law, California laws, all others), not only EU.	In general, compliance of OEKO-TEX® RESPONSIBLE BUSINESS with certain national policies or laws cannot be claimed due to legal reasons. However, we will be able to call out alignment of certain aspects of OEKO-TEX® RESPONSIBLE BUSINESS with national laws. We will take into consideration: German supply chain act Swiss counterproposal to the Responsible Business Initiative UK Slavery Act, 2015 US / NY Fashion Sustainability and Accountability Act US / California Transparency in Supply Chains Act FR Loi de Vigilance
A BETTER CONTROL OF ALL PRODUCTS COMING IN... AN ASSURANCE OF PURITY...	OEKO-TEX® RESPONSIBLE BUSINESS is not a product related certification but refers to the implementation of a responsible business conduct in business activities and processes.
a streamlined platform for assessing human rights and environmental impact across the supply chain and creating transparency on it for a consumer	OEKO-TEX® RESPONSIBLE BUSINESS supports compliance with human rights and environmental criteria, maps their implementation in the company's own operations and in the supply chain, and provides incentives to improve the company's own performance in these areas through the transparency of the due diligence measures implemented.
To be able to show the efforts that we make	As the certificate and report transparently reflect the efforts in regard to human rights and environmental due diligence of a business enterprise, they can be used to demonstrate the implemented due diligence.
Promote ethical business	OEKO-TEX® RESPONSIBLE BUSINESS certified companies have committed to adhering and respecting the Universal Declaration of Human Rights as well as contributing to ethical business practices through the implementation and enforcement of due diligence.
I love the Oeko-Step which provides a transparent overview of the supply chain with risk management + quality management, which gives you a very good foundation and makes the entire organization transparent	Thank you for the valuable comment.
Concrete information on how to solve issues in the supply chain.	Part of OEKO-TEX® RESPONSIBLE BUSINESS is the conduction of a risk analysis, which unveils potential of existing human rights and environmental risks of the company's business and its supply chain.
Can it not only be for brands? also further down in the chain? We also have suppliers that require due diligence.	OEKO-TEX® RESPONSIBLE BUSINESS is specifically designed for brands, traders and retailers to assess and certify their implemented human rights and environmental due diligence. We are currently discussing opportunities to make the standard applicable to further supply chain actors.
audit to a CoC , audit management , health and safety audit	OEKO-TEX® RESPONSIBLE BUSINESS reviews human rights and environmental due diligence requirements, which include reviewing responsible business policies, and identifies a number of risks that need to be avoided, mitigated and stopped.



b) What challenges do you see with regard to upcoming due diligence legislations?

Topic	Comments
Compliance.	In general, compliance of OEKO-TEX® RESPONSIBLE BUSINESS with national policies or laws cannot be claimed due to legal reasons. However, we will be able to call out alignment of certain aspects of OEKO-TEX® RESPONSIBLE BUSINESS with national laws.
A MORE OPEN VIEW OFF ALL PRODUCERS FROM BEGINNING TO THE END OF THE CYCLE, WHAT ASSURE THE END CUSTUMOR OF A MORE PURE PRODUCT.	As the certificate and report transparently reflect the efforts in regard to human rights and environmental due diligence of a business enterprise, they can be used to demonstrate due diligence efforts to consumers and customers.
ability of companies to mobilize human and financial resources to set up the system and track compliance	Due to the systematic and structured approach of OEKO-TEX® RESPONSIBLE BUSINESS, it facilitates the implementation of human rights and environmental due diligence for companies. However, this new approach requires the revision of management processes, decision-making, KPI's and as such requires human and financial resources to transform and implement a responsible business conduct.
The complexity of the textile supply chain.	Thank you for the valuable comment.
A due diligence investigation is a complete overview of all figures, data and data of a company, providing a clear picture of the current state of a company. This prevents corpses from coming out, such as debts, ongoing lawsuits or contaminated soil.	OEKO-TEX® RESPONSIBLE BUSINESS considers the implementation of human rights and environmental due diligence. It is a tool that supports the non-financial reporting on ESG.
Support for the requirements of the germany due diligence law.	Among other regulations and laws, the German supply chain act has been an important reference for the development of OEKO-TEX® RESPONSIBLE BUSINESS.

c) Do you see any specific chances or risks for collaborating with existing or potential supply chain partners?

Topic	Comments
The risk that a supplier decides to not be compliment, then creating the risk of not being compliment yourself and loose a certificate which is difficult to explain to sensitive customers.	To ensure that the OEKO-TEX® RESPONSIBLE BUSINESS certificate remains valid, annual compliance audits in the company are required. Therefore, compliance is checked regularly.
NO;.... IT BECOMES A MORAL DUTY TO BE OPEN AND CONSTRUCTIVE IN ORDER TO PREVENT, FIRST THE CUSTOMER AND IN GENERAL OUR CLIMATE.	Thank you for the valuable comment.
Disclosure of information is always a sensitive point within the supply chain so a special attention would need to be put into data security and NDAs. Also, the cost might be an issue when cascaded down to the supply chain.	Thank you for the valuable comment.
The complexity of the textile supply chain.	Thank you for the valuable comment.
What about confidentiality within supply chains ?	OEKO-TEX® RESPONSIBLE BUSINESS considers the implementation of human rights and environmental due diligence. It is a tool that supports the non-financial reporting on ESG.
Support for the requirements of the Germany due diligence law.	The compliance with regulations and laws as well as the implementation of human rights and environmental due diligence require cooperation and transparency in the supply chains. OEKO-TEX® RESPONSIBLE



	BUSINESS supports transparency and communication within supply chains.
recycled material suppliers that do not have a robust internal chemical management and product testing strategy, even if these partners have oekotex if they do not have these additional processes there is high risk of non compliance and final production being rejected due to issues at	OEKO-TEX® RESPONSIBLE BUSINESS is a management tool to meet human rights and environmental due diligence requirements for the company's own business practices, the supply chains and wider business relationships. Detailed requirements on production conditions are covered by our facility certification, OEKO.TEX® STeP.
more trust to the partners while using an existing OekoTex audit system	Thank you for the valuable comment.

d) Would you use a complaint mechanism for supply chains provided by OEKO-TEX®? In your view, what would your specific requirements for such a complaint mechanism be?

Topic	Comments
yes	Thank you for the valuable comment.
no	Thank you for the valuable comment.
NOT DIRECTLY, IT WILL SCARE PRODUCERS...MORE EFFECTIVE WOULD BE STRONGER AUDITS AND SUPPORT TO AVOID MISTAKES IN THE FUTURE	Thank you for the valuable comment. We agree that audits are a strong tool to secure quality of the certifications and to prevent risks.
The complexity of the textile supply chain.	Thank you for the valuable comment.
yes, but if the tool's scope is large enough and able to encompass a wider scope of materials, not only textiles (with all the inherent social and environmental risk points).	OEKO-TEX® has an expertise in the textile as well as leather industry. Therefore, we will not widen the scope of materials.
This goes too far.	Thank you for the comment.
That it is transparent, quick, supported by actual experts, mediation of escalated problems if needed.	We agree with the importance of the requirements and are considering them in the development of our complaint mechanism.
no	Thank you for the valuable comment.

2.2. What information do you find valuable in the label check? Would you like to see any further information displayed?

Topic	Comments
Click on the product class to see what that means. Instead of just II, should be something like "II (ok for close skin contact, ages 3+)". Link to the company's buying guide listing? More consumer friendly description of the scope maybe it could show colors like the MIG info does.	Offering consumer-friendly tools is important to us. Therefore, we initiated a project to develop the Label Check further.
SOME SMALL RISK ANALYSIS TO ENSURE MORE THE KNOWLEDGE TO THE CONSUMER WHAT RISK ALL CHEMICAL / SYNTHETIC PRODUCTS MENTIONED IN THE CERTIFICATION CAN CAUSE EVEN IF THEY ARE UNDER TOLERANCE ...	Thank you for the valuable comment. We will evaluate internally and take this into consideration for future developments.
info on type of article, certificate scope are valuable. Additionally, we would like to see the name of the certificate holder.	Thank you for the valuable comment. We will evaluate internally and take this into consideration for future developments.



The company/owner of the certificate number should be displayed. We have seen other companies printing our certificate number on their samples and products. The consumer can only see the certificate number is valid however they can't see it does not belong to the product it is used on.	Thank you for the valuable comment. We will evaluate internally and take this into consideration for future developments.
Is OK like it is.	Thank you for the valuable comment.
We are approved by oekotex, never got a number or certificate.	Please feel free to get in touch with your OEKO-TEX® institute and ask for your OEKO-TEX® certificate or label number.
Okay as it is.	Thank you for the valuable comment.
Yes the name of certificate company name.	Based on the preference of the OEKO-TEX® MADE IN GREEN label owner you can see different information about the producer. Please find more information about our "Permission levels" in chapter 4.3.2 of our OEKO-TEX® MADE IN GREEN Standard.
The name of the company.	Based on the preference of the OEKO-TEX® MADE IN GREEN label owner you can see different information about the producer. Please find more information about our "Permission levels" in chapter 4.3.2 of our OEKO-TEX® MADE IN GREEN Standard.
It's okay the way it is.	Thank you for the valuable comment.
name of cert. holder , in case it is not valid - date when renewal as been applied for	Based on the preference of the OEKO-TEX® MADE IN GREEN label owner you can see different information about the producer. Please find more information about our "Permission levels" in chapter 4.3.2 of our OEKO-TEX® MADE IN GREEN Standard.

2.3. OEKO-TEX® MADE IN GREEN

a) What information is valuable to you in the OEKO-TEX® MADE IN GREEN label check?

Topic	Comments
P.S. The show on map links (within the map icons) seem to go to a map but not show the locations.	Based on the preference of the OEKO-TEX® MADE IN GREEN label owner you can see different information about the producer. Please find more information about our "Permission levels" in chapter 4.3.2 of our OEKO-TEX® MADE IN GREEN Standard.
ALL	Thank you for the valuable comment.
Info on label owner and scope are valuable.	Thank you for the valuable comment.
Supply chain.	Thank you for the valuable comment.
Is OK like it is.	Thank you for the valuable comment.
Validation (or was valid until) We are a small company, the testing process was very expensive so we dont want to renew every 6 months or.... whats stated. Never got any info on that part.	Thank you for the valuable comment. We will take this input up and see how we can make the future label check even more transparent and customer friendly.
up to spinning mill is interesting for us	Thank you for the valuable comment.

b) What other types of information would you be interested in to see?



Topic	Comments
Provision of information of the footprint of the end-product	Thank you for the valuable comment. We will evaluate internally and take this into consideration for future developments of the OEKO-TEX® MADE IN GREEN label check.
Provision of company scores	The company score (OEKO-TEX® STeP scoring) can already be viewed in the company profile within the OEKO-TEX® MADE IN GREEN map if permission level 3 is applied. Please find more information about our "Permission levels" in chapter 4.3.2 of our OEKO-TEX® MADE IN GREEN Standard.
Provision of information about environmental and social conditions of product manufacturing	Thank you for the valuable comment. We will evaluate internally and take this into consideration for future developments of the OEKO-TEX® MADE IN GREEN label check.
POSSIBILITY OF THE "FOOTPRINT" THAT IS BEEN CREATED OF THE END PRODUCT	Thank you for the valuable comment. We will evaluate internally and take this into consideration for future developments of the OEKO-TEX® MADE IN GREEN label check.
Additionally, we would like to see the score of the company.	The company score (OEKO-TEX® STeP scoring) can already be viewed in the company profile within the MADE IN GREEN map if permission level 3 is applied. Please find more information about our "Permission levels" in chapter 4.3.2 of our OEKO-TEX® MADE IN GREEN Standard.
It's OK.	Thank you for the valuable comment.
production free from harmful substances or closed area so employees wont get into contact with the substances so the products is not only good for the consumer but also for the employees in the manufacturing. Some products are approved by OekoTex, but it doesnt provide any info on the manufacturing process.	Thank you for the valuable comment. We will evaluate internally and take this into consideration for future developments of the OEKO-TEX® MADE IN GREEN label check.
none	Thank you for the valuable comment.



IV. Future Topics

3.1. Circularity

a) What are the main challenges you see regarding circular economy?

Topic	Comments
CREATING A SORT OF SUB VALUATION IN THE USE OF RECYCLED PRODUCTS	We agree with the identified challenges and takes them into consideration in business development on Circular Economy.
availability and cost of recycled and bio-based materials, further development of the recycling infrastructure.	We agree with the identified challenges and takes them into consideration in business development on Circular Economy.
Recycleability of textiles onto which transfers, direct print and emblems are applied by means of direct silkscreen (plastisol, water based silkscreen inks), digital print (DTG) or heat sealing. This appears to be a topic becoming increasingly important for our customers, who need to establish this for their environmental certifications. Practically there seems no solution for a problem which pertains most workwear in use.	We agree with the identified challenges and takes them into consideration in business development on Circular Economy.
Finding a new use for textiles containing different sources of material. At the moment, more possibilities are available for apparel, less or almost none for interior textiles.	Thank you for the valuable comment.
To proof that the recycled content doesn't content dangerous substances.	This is addressed by our special requirements for recycled materials within the OEKO-TEX® STANDARD 100 where we have developed a strict test matrix to test for harmful substances.
- Not all current production processes (and equipment) are suitable for use of recycled materials - Collection of post-consumer waste should be well organised, not feasible to do this for every company on its own, better to structure within application domains	We agree with the identified challenges and takes them into consideration in business development on Circular Economy.
The complexitiy to create industrial feasible circular products.	We agree with the identified challenges and takes them into consideration in business development on Circular Economy.
for us, our basic material. thats a one time use. Maybe in the future this material is made of recycled plastic.	We agree with the identified challenges and takes them into consideration in business development on Circular Economy.
To get the complete supply chain on this topic and also to accept that this has to come with an cost price increase. Even our biggest customers (retail chain stores) with complete Green goals are not acting in real live. Still adding to much raw materials such as aluminium in there products then needed. Waste of materials and money.	We agree with the identified challenges and takes them into consideration in business development on Circular Economy.
Recycled cotton and polyester can not be Oekotex certified. It would be good if it could be tested and be Oekotex certified in the same certificate as the normal Oekotex certificate .	Both recycled cotton and polyester can be certified according to OEKO-TEX® STANDARD 100. To be in line with upcoming EU regulations on substantiated green claims, we ensure transparency in the textile and leather supply chain. This requires separate certificates for conventional and recycled materials to allow consumers and industry partners to identify which materials are recycled and which not.
certifying recycled materials, especially post consumer (due to legacy chemicals and issues that arise from use phase (detergents etc)).	We agree with the identified challenges and takes them into consideration in business development on Circular Economy.
technical circulation , building up a system of return at the shops of the customers , design/producton of textiles which can be recycled	We agree with the identified challenges and takes them into consideration in business development on Circular Economy.





b) How could OEKO-TEX® support you and the industry regarding circular economy?

Topic	Comments
Provision of a new list summarizing risks of hazardous components in recycled materials.	The idea will be taken into consideration and its feasibility will be discussed internally.
human rights due diligence in the supply chain , recycled product certificates must not request that only outshellmaterial is important , but the generall weight percentage of the material - for example - if filling is 60 % of the article weight it can be delivered under a recycled oekotex stanard 100 % certificate	The testing of pre- and post-consumer textiles is already possible. The amount of testing will be determined depending on the source and variety of articles. Please contact any of our testing institutes if you are interested in getting articles certified. Here is a link to an overview of our testing institutes: OEKO-TEX® locations worldwide
extra points could be assigned to companies having a sustainability strategy with a circularity in it and / or circular projects.	Thank you for the valuable comment. We will consider it in our developments on Circular Economy.
The industrie needs to be pushed to do better in this respect but is has to be a combined effort through the whole supplychain of workwear from manufacturers, garment rental, laundry and embellishment producers together. As it stands now we see that it is almost impossible to recycle cost effective or with keeping the footprint down by avoiding solvent chemicals for removal of these embellishments	We agree with you that the whole industry needs to work together to achieve circularity goals. Therefore, we are engaged in various multi-initiative working groups on Circular Economy.
More information on the current possibilities.	We will integrate topics around Circular Economy more and more in our business development and will inform about the process.
Perhaps the waste could also obtain an oekotex certificate (based upon oekotex-certificates of the garments before they were waste, or based upon test results).	Thank you for the valuable comment. We will consider it in our developments on Circular Economy.
- Oeko-tex could give a clear view on content of materials to recycle. It could be good to have a kind of checklist per type of product on hazardous components that make clear what are risks in materials to recycle	Due to the variety of materials and chemicals used on them a simple checklist is not possible. An additional complexity brings time, certain chemicals have been used in certain time frames in the past until they were identified as harmful and banned. As it is impossible to know the production date of recycled garments the risk assigned cannot easily be determined.
Don't overwhelm the industry with lots of certificates. We drown in administration.	We have prioritized digitalization to reduce the administrative work and enable faster workflows.
Contact me for better explanation. But it will involve some serious development and a factory who wants to make this base material. Maybe we should switch to eco paper (transparent).	Thank you for the valuable comment. We will get in contact with to you for clarification.
To get more awareness what is needed and this starts with the market leaders in the different segments. Ikea is a perfect example for this. Not much talking they just do it this should be for every one the minimum level to start with.	We will closely monitor the developments regarding Circular Economy in the market and will consider it in our business developments.
Not have a different certificate for each category, like normal, organic, recycled.	To be in line with upcoming EU regulations on substantiated green claims, we ensure transparency in the textile and leather supply chain. This requires separate certificates for conventional and recycled materials to allow consumers and industry partners to identify which materials are recycled and which not.
have an open dialogue with industry stakeholders regarding this topic to stress test the protocol and give open feedback on the existing protocol. Mapping out the supply chain and how the protocols can/should be different along the value chain. Understanding what can be done when there is a non compliance...which in case of post consumer for sure will happen in higher frequency.	Stakeholder engagement is highly important for us. Therefore, we are engaged in several multi-stakeholder initiatives and working groups regarding the topic of Circular Economy.





3.2. OEKO-TEX® Portfolio and Scope

a) Are there any special sectors/products of the textile or leather industry which are not properly covered by the current product portfolio of OEKO-TEX®?

Topic	Comments
No	Thank you for the valuable comment.
No	Thank you for the valuable comment.
All our products are currently covered by the scope.	Thank you for the valuable comment.
Furniture, computer industry (keyboard / mouse). Have it all day in direct contact with your hands. headsets.	It is already possible to certify such articles. Articles with for example electronic components like headsets can be certified according to the Special Articles supplement. If an article or article group is not listed there, please send a request to any of our testing institutes. Here is a link to an overview of our testing institutes: OEKO-TEX® locations worldwide
application form : wrong classification of for recycled material - acutally mentioned endconsumer waste = pre consumer and industrial waste = post consumer	We have already internal definitions for both terms and are working to a more transparent communication of them in external documents.

b) Where do you see potential / a need for OEKO-TEX® to expand its scope?

Topic	Comments
Recycled and organic materials can be pushed more in the current certifications.	According to our announcement on new regulations beginning of this year we will launch OEKO-TEX® ORGANIC COTTON, a standard for organic cotton textiles in April 2023. Recycled materials are tested within the scope of OEKO-TEX® STANDARD 100.
Furniture, computer industry (keyboard/mouse). Have it all day in direct contact with your hands. headsets.	It is already possible to certify such articles. Articles with for example electronic components like headsets can be certified according to the Special Articles supplement. If an article or article group is not listed there, please send a request to any of our testing institutes. Here is a link to an overview of our testing institutes: OEKO-TEX® locations worldwide
human rights due dilligence in the supply chain , recycled product certificates must not request that only outshellmaterial is important , but the generall weight percentage of the material - for example - if filling is 60 % of the article weight it can be delivered under a recycled oekotex stanard 100 % certificate	In November 2022 we launched OEKO-TEX® RESPONSIBLE BUSINESS, which is a management certification to meet supply chain due diligence requirements in the textile and leather industry. This is already considered in the requirements for recycled materials in the OEKO-TEX® STANDARD 100 certification. The percentage of the main materials is considered to be relevant to prevent greenwashing and misleading communication.