

## Template for comments and observations

Date: July 23, 2015 –  
November 30, 2015

Document: **Organic Content Standard, v2**

Paragraph	Commented text	Proposed change	Comment (justification for change)
OCS A2.1b	*Gins shall not be certified to both GOTS and OCS.	does this need to be clearer in terms of confirming cross-Compliance ie GOTS certified Gins will be accepted into OCS supply chains and visa versa?	
Additional language added for clarity: "Gins shall not be certified to both GOTS and OCS. If a gin is certified to OCS and wants to be certified to GOTS, it shall contact its responsible CB to terminate its OCS Scope Certificate prior to the GOTS Scope Certificate issuance. Non-gin Organizations certified to both the Global Organic Textile Standard and the OCS shall be certified by the same CB in order to properly reconcile organic volumes among both standards."			
OCS A2. 2		Also as the EU are considering wool to be outside of the scope of the regulation (and therefore not able to be included on current farm/supplier certificates does OCS need to say anything else about the verification of ingredient sources for such products??	
The wording is sufficient to cover wool as far as the OCS is concerned: "...any <b>output</b> of organic farms that have been certified...". If a government is unwilling to certify a product, like wool in the EU, TE approved certification bodies can take extra steps to verify that the wool came from certified organic livestock and be entered into the OCS as an input.			
	Gins shall not be certified to both GOTS and OCS. If a gin is certified to OCS and wants to be certified to GOTS, it shall contact its responsible CB to terminate its OCS Scope Certificate prior to the GOTS Scope Certificate issuance.	It is better to have a system letting to use both standards in ginning as it is so in other processes.	The ginning companies would prefer to use GOTS rather than OCS, because it is more known among cotton users.
A gin could possibly sell the GOTS cotton as organic and then sell conventional cotton using an OCS certificate based off of the same input. To eliminate this possibility at any stage that is certified to both, they CB must be the same or in direct communication about those sites and their volume reconciliation of organic product.			
OCS A2.1b	The OCS addresses the flow of product within and between companies, and covers post-harvest processing, manufacturing, storage, handling, and shipping up through the seller in the last business-to-business transaction.	Add labelling and packaging	
Added into the A2 introductory paragraph list.			
OCS Logo Use Guide		It is also permitted to state "Made with/Contains a minimum of X% Organically Grown Material".	Allow the OCS to use "minimum" content like RCS language
The following has been added as an option: "Made with/Contains a minimum of X% Organically Grown Material" when multiple percentages are used but "X"			

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shall be lowest of the percentages.			
OCS Logo Use Guide		“Certified to the XXX” – does not need to have the logo in a sewn-in label	because it is not consumer facing.
“The exception to this is when a reference is not intended for the consumer (e.g. sewn in labels).”			
OCS Logo Use Guide B2.1		Limit what a brand can say. No reference to certified product should be made by a non-certified entity.	
Only certified entities may make on product and 100% Claimed Material claims.			