

Policy on the GMO Screening of Organic Cotton

Genetically modified organisms (GMOs) are not compatible with the principles and practice of organic production and processing and are, therefore, **not permitted** within the Organic Content Standard (OCS).

However, Textile Exchange recognizes that organic production does not exist in a vacuum and even the most stringent and diligent processes and procedures cannot always guarantee the complete absence of GMO material in organic supply chains.

The Organic Content Standard (OCS) certification is based on organic material content claims, and while Textile Exchange expects all reasonable steps to be taken to eliminate GMOs from textile supply chains, farmers and operators should not be penalized due to factors outside of their control. For example, if all aspects of the organic crop production and handling processes are followed correctly by a certified farmer or farm group (which includes not using GMO seed), then the presence of a detectable residue from GMOs alone should not disqualify the cotton from obtaining organic status.

However, it is vital that the reason for any presence of GMOs must be investigated, understood and appropriate actions are taken. As part of this protocol, Textile Exchange requires all Certification Bodies to gather and report data on GMO detections to fully understand the extent and causes of contamination and to potentially use the data to inform a threshold limit in the future. Any limit will aim to be as close to zero as is technically feasible, taking into account factors outside the reach of the organic control system. Data collection will also help Textile Exchange identify any other effective interventions on this issue.

Following the publication of the GMO Screening Protocol ISO IWA 32, Textile Exchange is issuing this policy to all Organic Content Standard (OCS) certification bodies, with particular relevance to those that certify gins & subsequent supply chain.

Section A - Testing

A1. Testing Requirements at Gins (First Processing Step)

A1.1 Seed cotton shall be tested for GMO presence at all OCS certified gins, as follows:

1. ISO 1130:1975 shall be used for sampling of the seed cotton.
2. The testing protocol to be followed is ISO IWA 32:2019.

A1.2 The certification body shall collect at least one sample per year at each gin for GMO testing. Remaining samples may be collected by the certified organization.

A1.3 In case of a positive test result on seed cotton, the certification body shall follow the protocol outlined in Section B of this policy.

A1.4 The certification body shall retain and collate data from GMO testing at the gin, and shall submit this information in a confidential format to Textile Exchange.

NOTE: This data will be used as part of Textile Exchange research to determine a suitable contamination threshold in cases where contamination is unintended, inadvertent or technically unavoidable. Such data will always remain confidential and is not for public or other stakeholder consumption.

A2. Testing Requirements – Other OCS Sites

A2.1 The certification body may test cotton at any site which handles non-chemically processed cotton.

A2.2 If the certification body believes that there is a substantial risk of volume substitution of non-chemically processed organic cotton at a site following the gin, the certification body should test the cotton for the presence of GMOs and follow the procedure for investigations in Section B.

NOTE: Textile Exchange no longer recommends testing on chemically processed cotton materials. The specified test protocol for unprocessed cotton is ISO IWA 32:2019. OCS-201 OCS Implementation Manual and OCS-102 Certification Procedures will be revised to reflect this change.

A3. Issuing of Transaction Certificates (TCs)

A3.1 The certification body shall not issue a transaction certificate to a gin for a lot of OCS cotton if any of the following applies:

1. GMO testing results for the lot are pending;
2. A positive GMO testing result was received for the lot and the investigation (see Section B) has not yet been completed; or
3. An investigation into a positive GMO testing result has resulted in a decision to reject the lot.

A3.2 The certification body shall include the transaction certificate number and scope certificate number of the farm on the first OCS transaction certificate (for sale from the gin).

NOTE: This requirement is also being adopted by GOTS. The certification body should look for this information when accepting transaction certificates from GOTS certified gins for OCS products.

A4. Implementation of this Policy

A4.1 The requirements contained in this policy shall come into force with immediate effect.

A4.2 Each certification body shall implement these requirements by October 1, 2019. This timing is intended to cover the fall 2019 cotton crop in the Northern Hemisphere.

A4.3 This policy supersedes *A2.2a MANUAL GUIDANCE* from *OCS-201-V2.0 OCS Implementation Manual*. Textile Exchange intends to include these requirements in OCS

V3.0 and/or its related documents, following the revision process which is currently underway.

Section B - Protocol for Positive Test Results

B1. Protocol for Positive Test Results for GMO Presence in OCS Certified Gins

- B1.1** If testing detects presence of GMOs, the certification body shall conduct an investigation to assess the source of the GMO detected, with the following possible conclusions:
1. Intentional use of GMOs/fraudulent declaration of organic product;
 2. Systemic issues at the farm (e.g. inadequate buffer zones to prevent genetic drift, inadequate procedures to prevent comingling with non-organic product in storage);
 3. Systemic issues at the gin (e.g. inadequate procedures to prevent comingling with non-organic product in storage);
 4. Unavoidable GMO contamination of organic cotton crop at farm; or
 5. No conclusion possible due to the farm not cooperating with the investigation.
- B1.2** In the case of conclusions 1. or 5., the certification body shall make a decision to reject the lot of cotton for OCS certification. The certification body shall not issue a transaction certificate for this material. If the gin is involved in fraudulent activity, a critical non-conformity shall be issued.
- B1.3** In the case of conclusion 2., the certification body shall inform the farm (either directly or via the gin) of the identified gaps.
- B1.4** In the case of conclusion 3., the certification body shall issue a major non-conformity to the gin relating to the systemic issues.
- B1.5** In the case of conclusions 1., 2., or 5., the certification body should report its findings to the appropriate national organic authority and to the farm's organic certification body.
- B1.6** The certification body may issue additional sanctions as it considers appropriate.
- B1.7** In all cases, the certification body shall report the findings of its investigation to Textile Exchange immediately, including the following information:
1. The identification of the gin;
 2. The test report (under ISO IWA 32:2019 and GMO contamination test report, if available);
 3. The identification and scope certificate number of the farm;
 4. The transaction certificate number from the farm to the gin;

5. The conclusion of the investigation; and
6. The sanctions or corrective measures taken.