



OEKO-TEX® Public Stakeholder Consultation

Results 2024

OEKO-TEX®

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

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An overview

OEKO-TEX® conducted a Public Stakeholder Consultation from 12th August to 27th September 2024. We consulted on changes to OEKO-TEX® STANDARD 100 as well as the role of certifications on due diligence obligations.

The goal of the OEKO-TEX® Public Stakeholder Consultation is to allow for the participation of stakeholders in the OEKO-TEX® Standard Setting Process. We engage stakeholders at key stages, ensuring their feedback is effectively integrated by our committees during the development of updates to the OEKO-TEX® Standards.

Every comment and input received from stakeholders was reviewed internally and passed on to the responsible. The feedback was considered in discussions within our OEKO-TEX® Working Groups and the decision making that took place in our last General Manager Meeting.



159 participants



28 countries



Ø 84% response rate*

Participants



Stakeholder groups
Manufacturer (38%)
Testing institutes (14%)
Brands (14%)
Retailers (8%)
Consultants (7%)



Professions
Textile Engineer (15%)
Product Development (9%)
Quality Assurance (9%)
CSR – Manager (8%)
Regulatory Affairs Specialist (7%)



Locations
Germany (16%)
USA (10%)
Switzerland (9%)
France (8%)
Pakistan (5%)

*not all stakeholders intended to provide feedback on all questions



Changes on OEKO-TEX® STANDARD 100

OEKO-TEX® STANDARD 100 is a label for textiles tested for harmful substances. It sets the benchmark for textile safety, from yarn to finished product. To maintain these high standards, we revise our criteria annually, considering legal requirements, research findings, test results, and stakeholder demands.

OEKO-TEX® consulted on 17 proposals for its OEKO-TEX® STANDARD 100 revision.

The feedback plays a key role in shaping the updates to be implemented in the 2025 update of the standard.

95%

Average response rate

83%

Average agreement rate*

4

No. of proposals with
disagreement rate above 20%:

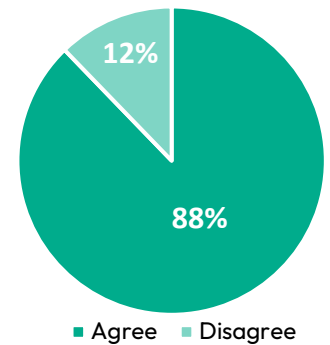
*(how many people filled in questions in relation to total number of participants for STANDARD 100 questions)

Proposal 1

The current standard consists of 4 product classes and 2 annexes. It provides a precise framework for risk-based chemical safety testing. This complexity can result in up to 8 different limit values for a single substance within the OEKO-TEX® STANDARD 100.

Proposal: Reduce the possible limit values per substance from 8 to 3.

Preliminary idea: Establish one limit value for baby articles, one for apparel, and one for articles that do not come into close contact with the body (e.g., curtains, tapestry).



Stakeholder feedback for disagreement	OEKO-TEX® response
First, I'd like to mention that I studied fashion in London and have been working on a Motion Picture & Television project on a closely related issue for which I hope to feature OEKO-TEX, assuming we succeed in funding. I disagree because although we are not in touch with for example curtains as we with the garments we wear, we do come into contact quite regularly depending on one's lifestyle. What about the person who manages washing curtains in a dry cleaners, hotel staff, children that play hiding behind curtains all day and much more. They may be the minority in comparison to the masses but when that is you or someone close to you who is diagnosed with an incurable auto-immune disease or cancer then the values change. The other matter is that as we all know producing any variant of harmful products will produce traces that will eventually find their way back to nature, into our water and food affecting not just humans but also animals and plants. I love and appreciate your work for what you have done so far because of including all humans, animals and nature into the care package.	Thank you very much for your feedback. We will choose the limit values according to safety and environmental concerns.
Additional information needed	Thank you very much for your feedback. For our next Public Stakeholder Consultation, we will ensure sufficient information for informed decision making.*
In principle a reduction of complexity is highly appreciated but it is recommended to keep Annex 4 limit values for Class I and to combine the other classes under this Annex to one additional product class.	
We agree with the principle to simplify which will help the main actors in the supply chain. But in order to make an informed decision, we need to have the details to assess any consequences of the change	
We agree with the principle to simplify which will help the main actors in the supply chain. But in order to make an informed decision, we need to have the details to assess any consequences of the change	Thank you very much for your feedback. We will choose the limit values and testing according to feasibility, safety and environmental concerns.
Reduce no of Color of each fabrication for test	
We would insist to keep the broader annex 4-5 limit values but for the product classes we can agree to reduce to 3 (baby, apparel, decoration)	
Simplifying standards requirements is often for the convenience of manufacturers and reducing their costs, neither of which benefits consumers.	

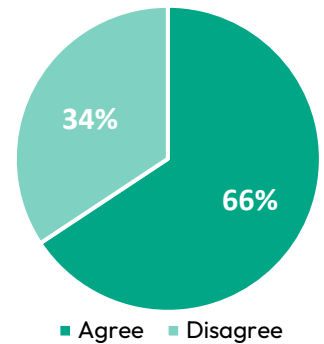
*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

Seems like what exists is working. Not sure why change would be beneficial, but I am open to it	Thank you very much for your feedback.
In principle I agree on an approach to simplify / streamline the OEKO-TEX regime of limit values. Nevertheless, I have chosen "disagree" because on the one side I currently cannot estimate the consequences of the reduction to only 3 limit values and on the other side a reduction may lead to a less adjusted and targeted risk-based framework of the OEKO-TEX system. So, could you please explain your proposal more detailed, maybe with examples for the current 8 different limit values and the future reduced 3 limit values.	Thank you very much for your feedback. For our next Public Stakeholder Consultation, we will ensure sufficient information for informed decision making. We will choose the limit values according to feasibility, safety and environmental concerns.
What about home textile bed linen and towels, where it would be categorized especially it can be in direct contact.	Thank you very much for your feedback. We will choose the limit values according to feasibility, safety and environmental concerns. The high skin contact of towels will be taken into account when setting those.
Potentially I would agree but it is not possible to give a simple answer to such a big change without knowing and understanding how the corresponding approach will be and which limits will result from this approach. A simplification is always welcome but needs to remain workable.	Thank you very much for your feedback. For our next Public Stakeholder Consultation, we will ensure sufficient information for informed decision making. We will choose the limit values according to feasibility, safety and environmental concerns.
Great initiative to review the current system of categories that often causes debate in the market. However reducing from the 8 to 3 limit values does not guarantee proper safety or sustainability for potential users. Hence only ONE limit for all adult & baby apparel and other textile articles will achieve this. 1. how will you avoid that baby's come into contact with adult apparel or a sofa fabric that allow for higher levels of chemicals then baby fabrics? 2. as a manufacturer of textile materials you will follow the strictest requirement, so your material can be used by a maximum amount of customer and product applications (this is a basic market economy rule) Annex 4/5 should be minimum grouped with 6/7 of Detox Campaign. However the global market is already multiple steps ahead (ZDHC) of the EU minimum safety requirements (annex 4/5). As the global market needs to recycle textiles today, legacy chemicals cause a serious problem as mechanical recycling is still the most dominant and economically viable technique. To ensure that Okotex is future proof and remains THE standard that ensures safety today & tomorrow, Okotex needs to look into ZDHC and other relevant program's to support a circular textiles economy. For more information on how and what do not hesitate to contact us.	Thank you very much for your feedback. We will choose the limit values according to feasibility, safety and environmental concerns.

<p>In the context of PFAS and the current need to maintain them for complete protection against liquid chemical splashes, this poses a problem for the materials concerned. We need to be able to differentiate between what complies with the regulations and should only be used for chemical PPE and what goes beyond the regulations with PFAS-free products. The reduction in the number of possible values is in itself a good thing, and makes the reading less restrictive for the consumer, apart from the specific point explained above. (Translation from original comment)</p>	<p>Thank you very much for your feedback. We are deciding on limit values based on feasibility, safety and environmental concerns, including, of course, PFAS.</p>
<p>i think anything a baby can't wear or touch shouldn't be worn or touched by adults either</p>	<p>Thank you very much for your feedback. We will choose the limit values according to safety and environmental concerns.</p>
<p>At this point, we disagree because it is unclear how the product groups will be merged. If product groups II and III are merged, then each substance's lowest threshold must be applied. The same applies to the merger of product groups III and IV. In the suggested preliminary idea above, it is not clear whether the apparel category includes all products of categories II and III. It has to be clearly explained to better understand the approach.</p>	<p>Thank you very much for your feedback. For our next Public Stakeholder Consultation, we will ensure sufficient information for informed decision making. We will choose the limit values according to feasibility, safety and environmental concerns.</p>
<p>Taking into account the proposal explanation: from 2 annexes it will become one, 2 annexes should be maintained, or in any case at least the annex 4 should be maintained.</p>	
<p>We disagree because it's not clear how exactly the product groups will be merged. If the groups 2 and 3 are merged, then each substance's lowest threshold must be applied. The same applies to the merger of product groups 3 and 4. In the suggested idea above it's not clear whether the apparel category includes all products of categories 2 and 3. It has to be clearly explained to better understand the approach.</p>	

Proposal 2

Allow the use of fragrances on OEKO-TEX® STANDARD 100 certified articles



Stakeholder feedback for disagreement	Response
We do not allow fragrances in our business approach and are discouraged to use them in Environmental Labelling (Nordic, EU, German Eco labels)	Thank you very much for your feedback. Fragrances will remain forbidden in STANDARD 100 certified articles. This was decision was taken based on the volatility, allergenic potential and lack of added value of fragrances in the textile sector.*
Many people are highly sensitive to Fragrances	
In my opinion a fragrance doesn't have a "need to" function and therefore the use of it should be as low as possible. The aim of Oekotex certified articles should be that they are as clean as possible from chemicals.	
I don't see any point of adding fragrance in the production of textiles. It is a waste of resources.	
I think that the risk for the environment would be anyway too high.	
Fragrances are not a critical part of articles and excluding them will not have any impact on the quality of the article or result in the hinderance of producing the article. Therefore, the risks associated with having potent allergens on human ecology outweigh the benefits of having fragrances in an article.	
Fragrances are harmful	
We agree in principle with this proposal and support a new regulation for the use fragrances in OEKO-TEX Standard. We propose a similar approach as in the cosmetic regulation for leave-on products.	
As a consumer, if I choose Oeko-Tex Standard 100 products I hope that these products don't have fragrance because I think it is not necessary and it is an additional risk to be in contact with allergen substances.	
I am not familiar with the use of fragrances in textile articles and I don't see the relevance for an inclusion in Oeko-Tex articles. There is no option for a neutral answer, so I rather disagree.	
I dont want to allow fragrances in apparel	
Allergies in my families to fragrances	
As there are already many risks linked to fragrances known today, allowing further implementation increases the risk even for white listed fragrances: science knowledge increases and who knows what will be in the future with further fragrance usage. And I do not see any need to have fragrances on new textiles. If the consumer wishes odour on it, it's the consumers' choice to buy textile fragrances and "finish" the textile him-/herself.	

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

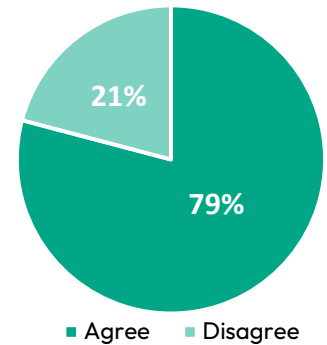
I want fragrance	
No confidence that these exclusions will benefit consumers. The exclusions are there for a reason.	
Concentration limits and article usage can impact safety.	
the potential to be problematic for customer regardless of toxicologist/white list. fragrances don't add technical benefit and potential create problems	
Hard to supervise	
In general I do not see the need for fragrances in textiles. And fragrances (in general) might be harmful. Exceptions might apply for hygiene products.	
Fragrances is a nice to have function and not a need to have function. Fragrances is not associated with health, safety and sustainability.	
The possibility of having fragrances in the textiles does not make up for the risk of potential allergies	
My opinion is not to add more chemicals to the production, on the contrary to diminish them	
many people with fragrance sensitivities use OEKO-TEX Standard 100 as a "screen" to know which products are fragrance-free and this would introduce a level of uncertainty.	
our consumer are for children. regardless of "save" lists children as well as adult can be impacted by smell.	
NOT NECESSARY	
What is the value added by fragrances on textiles compared to the additional resources used and the potential risks added, or the extra effort to white list some of them? When consumers want textiles with perfume smell they can use washing powder or softeners adding a smell.	
Actually, I agree with this proposal. I only have chosen "disagree" because it is not possible to give a comment if "agree" is chosen. My suggestion would be, to add to the approval by toxicologist and inclusion on a white list information about fragrances derived by regulatory information (e.g. EU cosmetic regulation 1223/2009; evaluations by the EU Scientific Committee on Consumer Safety or the Germany BfR; EU regulation on plastic materials in food contact 19/2011 or the BfR recommendations on food contact materials). Within these existing regulations substances, including fragrances were already evaluated under even stricter conditions than contact with textiles. These assessments can be used to either come to faster conclusions or at least to save costs for toxicological evaluation.	
Increases potential for exposure to chemicals and allergens	
I don't see how fragrances have any part of textiles - I don't combine those two, so fragrances are not a priority for our products.	
Fragrances do not belong in textiles and only dilute the message of what okotex stands for, safe textiles for people and the environment.	

Fragrances do not provide a positive impact to day to day textiles and normally disappear with time.	
Fragrances can not only contain many potent allergens, but also endocrine disruptors, phthalates or carcinogenic and reprotoxic chemicals. Due to their frequent use and volatility, fragrances are among the chemical substances with which humans come into frequent contact, which is why it is important to regulate them appropriately.	
because of hazardous of many fragrance.	
My experience with a whitelist at Ökotex shows that the system is not transparent. An example is the list of approved biocidal textile auxiliaries: the list only contains the names of the textile auxiliaries that promise biocidal treatment, whereas the active ingredient is not visible on the whitelist. In my opinion, this is not the right approach that Ökotex is taking. nobody knows the criteria by which a textile auxiliary gets onto this whitelist. If a whitelist of approved fragrances looks the same, what I feared, I reject it.	
Fragrances often trigger allergies and therefore have an indirect impact on human health.	
Makes Standard more complex for all stakeholders for a topic which is judged to be of relevance only for a marginal part of products.	
Fragrances can cause allergic reactions for some people. For babies we completely disagree.	

Proposal 3

Microencapsulated chemicals can be very diverse in nature and testing them is challenging.

Proposal: Ban microencapsulated products certified under OEKO-TEX® STANDARD 100.



Stakeholder feedback for disagreement	OEKO-TEX® response
As its harmful for human being	Thank you very much for your feedback. A final decision on that topic must be made. Your input will be considered in next year's discussions.*
If the nature of the encapsulation is chemically safe and otherwise does not propose medical or environmental risks, it is not necessary to ban them in a textile and children's products framework. This may or may not be related to microplastic, nanoparticles and/or natural polymer safety.	
Depends of kind of microcapsules	
Before I can decide on this question, it is necessary to provide a definition of the term "plastic-based glitter". I guess, the intention of the proposal is to avoid synthetic polymer material, which does not degrade or compost in the environment. If this is meant, it should be clearly indicated in the proposal. In case syntheic polymer microparticles (SPM) are banned to produce Oekotex certified textiles, it won't be able anymore to use fluorine-free hydrophobing auxiliaries, because these are typically based on polyurtehane, which falls under the definition of SPM!	
IF the chemical product is accepted by oeko tex there is not reason not accept microencapsulated product	Thank you very much for your feedback. Antimicrobial products are considered ACPs and are therefore already part of our white-list process.
Especially antibacterial agents are often used for garments, there is a need in the industry for them. If we could find a way to create a whitelist for them would be most helpful for our customers.	
establish system which is in use in textile and other industries. Unless proven dangerous / harmful substances are used we don't see reason to ban	Thank you very much for your feedback. A final decision on that topic has to be made. Your input will be considered in next year's discussions.*
The ban should be justified	
The proposal is quite generic and targets any related species without any visible scientific reason for the restriction. In case of surface-treated flame retardants, PCM's or bio or photo-active species it would basically prohibit the use of any advanced technologies, since the encapsulation is typically needed to render the products less water-soluble or to compatibilize them to textile finishing system or textile surfaces.	
NO ban of an interesting technology to protect and for well being of consumers.	
If fragrances are permitted, microencapsulations should also be allowed	

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

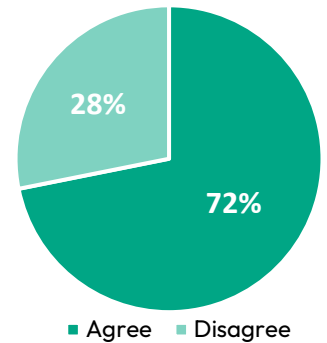
It's not necessarily bad to aim for a long term effect and delayed release. Instead of a ban, consider a white list and evaluation by an expert on health impact and also that no micro particles (capsules) are released into the environment that cause harm there (depending of the material used).	
I do not see a reason to ban microencapsulated products as long as the components are also checked for their safe behaviour.	
It may be safe	
This would hold back industry progress, as microencapsulated products are common.	
It contributes to enhanced product value addition	
Micro-encapsulated products are sold by many reputable chemical companies (eg Devan Chemicals) with diverse end effects (including temperature management) and we should rise to the challenge of certifying them .	
see response for fragrances - on top of that questionable fixation of capsules on textiles, pharmaceuticals should not be in textiles, antibacterials that are only loosely adhered to the fiber will not be efficient. Complex regulatory environment for synthetic plastic microparticles, even if gelatine may be exempt, but many other polymers are not.	
I do not see a need to ban microencapsulated chemicals as long as they don't lead to negative effects to human health of the environment. A positive example for microencapsulated chemicals is encapsulated waxes or oils for temperature management of winter clothing.	
Exactly as with other products/substances, a ban should be justified by a scientific/regulatory background showing an unmanageable risk for the consumer. An unjustified blanket prohibition not only makes no sense in the framework of this standard, but could also have additional negative effects by being copied and pasted in other standards without any consideration of the actual hazard and risk properties of the products.	
If oeko-tex does not test for them they will increase and no other agency tests for them.	
Microcapsules, made from inert and non-harmful materials, are commonly used in medicine as carriers for active pharmaceutical ingredients (APIs) and can be produced from biobased and biodegradable substances like gelatin. They can undergo intensive testing for toxicology and degradability, both as standalone microcapsules and within treated textiles. Additionally, their chemical nature can be analyzed using various analytical methods. If these tests confirm their safety for humans, microcapsules are safe to use and serve as a key tool for adding functionalities to textiles. They can also be permanently bonded to textile fibers, becoming an integral part of the fabric. Given that microcapsules are safe for use in pharmaceutical products, including ingestion, they should also be safe for use in textiles, provided they are properly tested and made with non-harmful materials in both the microcapsule wall and the chosen active ingredient. Moreover,	

microcapsules offer a safer and more controlled method for incorporating fragrances into textiles compared to using fragrances alone, as proposed in the previous question.	
They may provide additional function to a textile (for example temperature control) which cannot be achieved with other technologies.	
As we also should have a white list here, as it is related to medical and cosmetic products	
Encapsulation has potential positive prospects to improving the sustainability of textiles, improving recyclability.	
Oekotex should cover a large product palett. With this proposal the impact would be too high for the industry.	
seems like gathering more testing experience and data on them will be valuable. We won't gather data if we don't test it.	
This topic is too complex and should be studied more the chemical encapsulation for some protection properties, as this is very important and still needed on the market.	

Proposal 4

Microfibers, including microplastics, are an important pollutant of our waters.

Proposal: Ban the use of plastic-based glitter.



Stakeholder feedback for disagreement	Response
It depends on the size of glitter	Thank you very much for your feedback. A final decision on that topic must be made. Your input will be considered in next year's discussions.
Before I can decide on this question, it is necessary to provide a definition of the term "plastic-based glitter". I guess, the intention of the proposal is to avoid synthetic polymer material, which does not degrade or compost in the environment. If this is meant, it should be clearly indicated in the proposal. In case synthetic polymer microparticles (SPM) are banned to produce Oeko-tex certified textiles, it won't be able anymore to use fluorine-free hydrophobing auxiliaries, because these are typically based on polyurethane, which falls under the definition of SPM!	Thank you very much for your feedback. For our next Public Stakeholder Consultation, we will ensure sufficient information for informed decision making. Detachable microplastics from synthetic glitters have been put under observation in OEKO-TEX® STANDARD 100.
The problem is to define what we could replace plastic with without degrading the quality of our products.	Thank you very much for your feedback. Detachable microplastics from synthetic glitters have been put under observation in the STANDARD 100.*
As long as it can not be discharge during the life circle there is no risk of polluting the water. Moreover if we would like to ban microplastic then we should ban synthetic fibers directly.	
What would then be the alternative? glitter based on other materials (metal, glass) are also not sustainable. rather to ban all glitter	
Since microencapsulation may be authorised, this should also be permitted or any form should be prohibited.	
If it's plant based and has no negative effects on the pollution of waterways- should be allowed.	
There is no good sub. right now.	Thank you very much for your feedback. For our next Public Stakeholder Consultation, we will ensure sufficient information for informed decision making. Detachable microplastics from synthetic glitters have been put under observation in OEKO-TEX® STANDARD 100.
Before I can decide on this question, it is necessary to provide a definition of the term "plastic-based glitter". I guess, the intention of the proposal is to avoid synthetic polymer material, which does not degrade or compost in the environment. If this is meant, it should be clearly indicated in the proposal. Notes: - Entry 78 of REACH Annex XVII (restrictions) does explicitly not use the term microplastic anymore. The used term is instead "Synthetic polymer microparticles" (SPM) which is much more precise in terms of the intended scope. - Entry 78, in addition, explicitly excludes synthetic polymers, which are degradable*, soluble > 2g/l or do not contain carbon atoms in their structure (the latter because they are not	

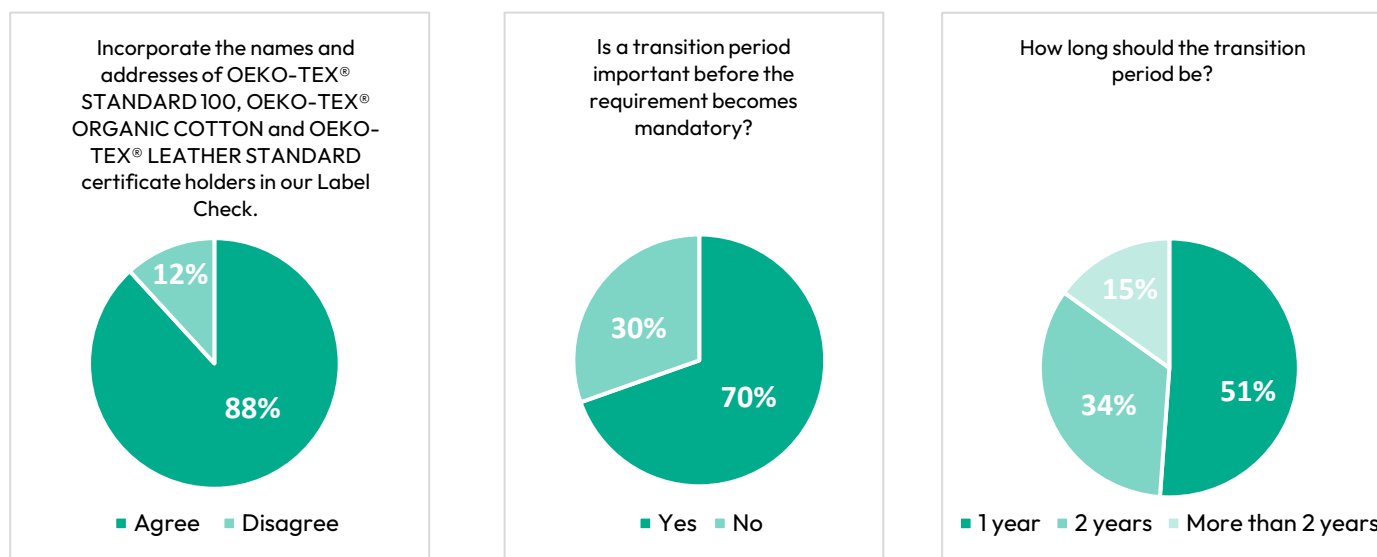
*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

organic and therefore per se not biodegradable). --> see: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R2055 * How degradation can be measured (in water, sea water, sediment or soil, i.e. biodegradation as well as compostability are covered) is specified in Appendix 13 of REACH Annex XVII related to Entry 78.	
Also metal based glitter should be banned as they also pollute and are a health risk for baby's and children when used in textile products.	Thank you very much for your feedback. A final decision on that topic must be made. Your input will be considered in next year's discussions.
only when the glitter (for design purpose) is released during normal use it should be banned.	Thank you very much for your feedback. Detachable microplastics from synthetic glitters have been put under observation in OEKO-TEX® STANDARD 100.
I do not know of the importance of this very specialist item in the overall situation. It seems to be an arbitrary rule where it is not clear to me and increases the complexity of the standard.	Thank you very much for your feedback. A final decision on that topic must be made. Your input will be considered in next year's discussions.
The Standard should be aligned in this point with EU regulation, see: https://single-market-economy.ec.europa.eu/commission-regulation-eu-20232055-restriction-microplastics-intentionally-added-products_en with statement (status 26.08.2024) "However, plastic glitter is not affected by the ban if it is contained by technical means, forms solid films (e.g. paints, certain inks) or, during end use, it is permanently incorporated in a solid matrix (e.g. glitter glue)".	Thank you very much for your feedback. Detachable microplastics from synthetic glitters have been put under observation in OEKO-TEX® STANDARD 100.

Proposal 5

Traceability and transparency are our core values.

Proposal: Incorporate the names and addresses of OEKO-TEX® STANDARD 100, OEKO-TEX® ORGANIC COTTON and OEKO-TEX® LEATHER STANDARD certificate holders in our Label Check.



Stakeholder feedback for disagreement	OEKO-TEX® response
Information tying brand and manufacturing factory together can be seen by competitors	Thank you very much for your feedback. Transparency is one of our key values. Therefore, on a voluntary basis, the address and company name will be shown in the label check in 2025 and it will be mandatory by January 2026.*
keep supplier confidential	
I don't see why this should be necessary?	
Many companies are just telling no OEKO-TEX order done. Then how could you verify the documents and clear the audit. Just verify the non OEKO-TEX order will not be helpful for checking in the audit	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
To compare competitors in the same product groups, the brands of the products should be listed. While the brand of the yarn we produce is listed in our certificate as a yarn producer, the fact that our competitor is only certified with the technical name of the yarn creates unfair competition. Some companies have differences in Annex 4 and Annex 6 in the same product group, and in this case, customers do not know exactly which standards the product they buy has.	Thank you very much for your feedback. Transparency is one of our key values. Therefore, on a voluntary basis, the address and company name will be shown in the label check in 2025 and it will be mandatory by January 2026.
If the product has passed the Oekotex Standard 100 or other tests- this should be adequate enough without the address and company	Thank you very much for your feedback. Transparency is one of our key values.

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.



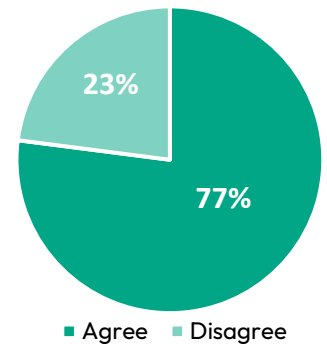
name. If the name of the manufacturer is requested- it should be available if inquirers contact you, but should not have to be on the label.	Therefore, on a voluntary basis, the address and company name will be shown in the label check in 2025 and it will be mandatory by January 2026. The names will not be given on the label itself, only upon entering the certificate number in the label check.
Just too much	Thank you very much for your feedback.
Coding can be included in label, that may contain information of manufacturer/label holder.	Thank you very much for your feedback. Transparency is one of our key values. Therefore, on a voluntary basis, the address and company name will be shown in the label check in 2025 and it will be mandatory by January 2026.*
The name of the producer is some cases IP of the seller of the goods and should not be publically available....	
It should be up to the brand if they want to share this information. OEKO-TEX as the standard developer should be the gurantee that everything is okay and the full transperency of the supply chain might be putting off brands who want to keep this knowledge. I am not sure though if this discussion is mute with the implementation of the DPP.	
Name and address is not necessary for check of certificate validity with Label Check and there can be better approaches to contribute to traceability and transparency.	
Make disclosure level optional like on MADE IN GREEN, unless the law requires this level of transparency. If legally required, align the transition period and include an explanation in myOT, on Label Check and in customer communications.	

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

Proposal 6

Pre-consumer PET bottles are a high fraud risk.

Proposal: Ban pre-consumer PET bottle recycling in the OEKO-TEX® STANDARD 100.



Stakeholder feedback for disagreement	OEKO-TEX® response
Currently from the sustainability point of view, recycle polyester has gaining popularity.	Thank you very much for your feedback. Pre-consumer PET bottles are an important source of fraud in the recycling scene. Moreover, pre-consumer PET bottles can be recycled to PET bottles in a circular manner. Therefore, pre-consumer PET bottles to textile recycling is not a form of recycling we would like to support. Pre-consumer PET bottles will therefore be banned from April 2025 in OEKO-TEX® STANDARD 100.
We rather have them certified externally, as of ISCC Plus or other supply chain audits/Statutory auditor check. How big is the problem?	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
Its very hard to do it	Thank you very much for your feedback. The source of the recycled PET bottles will be checked thoroughly to have an effective ban of pre-consumer PET-bottles as source of recycled material.

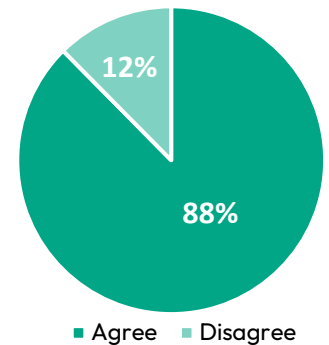
I could reduce the use of recycled materials in textiles and French government encourage the use of recycled materials. Maybe tests can be done to ensure the well used of pre-consumer PET bottles with a GRs or RCS certificates.	Thank you very much for your feedback. Pre-consumer PET bottles are an important source of fraud in the recycling scene. Moreover, pre-consumer PET bottles can be recycled to PET bottles in a circular manner. Therefore, pre-consumer PET bottles to textile recycling is not a form of recycling we would like to support. Pre-consumer PET bottles will therefore be banned from April 2025 in OEKO-TEX® STANDARD 100.*
The use of recycled material is a cornerstone of circular economy.	
PET bottles are a great source for recycled material. The risk of fraud is real, that's true but instead banning them we should find a way of proving that they are really used recycled bottle, maybe in connection with GRS.	
Pre-consumer recycling is better than no recycling. It should be required to state if it's pre-consumer or post-consumer recycling.	
From sustainability point of view pre-consumer PET is still preferred versus virgin PET material. This would contradict with EU sustainability Plastic strategy; Discover how the EU's plastics strategy aims to contribute to a circular economy, single-use plastics, microplastics and plastic waste: see: https://environment.ec.europa.eu/strategy/plastics-strategy_en "Driving innovation and investment: Scaling up support for innovation, with an additional €100 million to develop smarter and more recyclable plastics materials, to make recycling processes more efficient, and to trace and remove hazardous substances and contaminants from recycled plastics"	
envirmental needs, they can be more verified or tested	Thank you very much for your feedback. Pre-consumer PET bottles are an important source of fraud in the recycling scene. Moreover, pre-consumer PET bottles can be recycled to PET bottles in a circular manner. Therefore, pre-consumer PET bottles to textile recycling is not a form of recycling we would like to support. Pre-consumer PET bottles will therefore be banned from April 2025 in OEKO-TEX® STANDARD 100.*
In India it has a very vast scope of Business from this product in terms of Oekotex.	
Use of PET bottles should be reduced but if PET waste could be reused in other product we should not prohibit this	
It is anyway better to recycle also eventual pre-consumer PET bottles.	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
Figure out a better solution.	
Pet Bottles is an important source of Recycled material should be mandatory ensure realible on certified companies and ensure traceability	Thank you very much for your feedback. Pre-consumer PET bottles are an important source of fraud in the recycling scene. Moreover, pre-consumer PET bottles can be recycled to PET bottles in a circular manner. Therefore, pre-consumer PET bottles to textile recycling is not a form of recycling we would like to support. Pre-consumer PET bottles will therefore be banned from April 2025 in OEKO-TEX® STANDARD 100.

I do not agree in the high fraud risk	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
Actually, I fully agree. My additional comment on that proposal is: In case pre-consumer PET bottle recycling means, that PET bottles are produced only to be recycled as fibres without having the bottles ever be used the originate purpose as bottle should definitely be banned! With respect to sustainability this is complete nonsense, because a virgin material (in this case PET bottles) which has never been used for anything is raw material to produce a "recycled" material, here recycled PET-fibres (rPET-fibres). To my understanding, such a procedure actually is not actually recycling. General notes apart from the proposal itself: - Fraud by some actors should not lead to punish honest actors. - Therefore, fraud should be detected by controls. Vice versa compliance with the requirements should transparently be proofed by corresponding evidence, controls and audits. This should be the objective of a certification organisation.	Thank you very much for your feedback.
This is required to mitigate the fraud instead going to ban it. We may see the possibility to link with GRS certification to cover the recycling impact.	Thank you very much for your feedback. Pre-consumer PET bottles are an important source of fraud in the recycling scene. Moreover, pre-consumer PET bottles can be recycled to PET bottles in a circular manner. Therefore, pre-consumer PET bottles to textile recycling is not a form of recycling we would like to support. Pre-consumer PET bottles will therefore be banned from April 2025 in OEKO-TEX® STANDARD 100.*
On the long term I think it is a good idea to ban the pre-consumer PET bottle from entering the textiles business, PET bottles should be used for other plastics instead. However I think currently the demand for recycled polyester outweighs the amount of supply that can be done (as far as I know) - so before the banned is finalized it needs to be made clear to brands what other ways/textiles they can use instead.	
With this logic we should also ban our system, since there is a high risk of bribery. The question is how we control and mitigate the risk and not to ban something which actually makes sense if done correctly.	
a good way to recycle PET	Thank you very much for your feedback. Pre-consumer PET bottles are an important source of fraud in the recycling scene. Moreover, pre-consumer PET bottles can be recycled to PET bottles in a circular manner. Therefore, pre-consumer PET bottles to textile recycling is not a form of recycling we would like to support. Pre-consumer PET bottles will therefore be banned from April 2025 in OEKO-TEX® STANDARD 100. Please note that post-consumer PT bottles are not affected by this ban.*
Recycling of PET bottles is currently the main source of recycled polyester; there are insufficient quantities of recycled polyester from other sources. One of the reasons for this is that the technology to recycle polyester from pre- or post-consumer textile waste is not yet sufficiently available. In my view, banning polyester from recycled bottles would be a disadvantage for the recycling approach	
To ban this fiber source, it is necessary to evaluate demand versus market availability.	

Why ban? All of PET bottles could be evaluate like post consumer	Thank you very much for your feedback. Pre-consumer PET bottles are an important source of fraud in the recycling scene. Moreover, pre-consumer PET bottles can be recycled to PET bottles in a circular manner. Therefore, pre-consumer PET bottles to textile recycling is not a form of recycling we would like to support. Pre-consumer PET bottles will therefore be banned from April 2025 in OEKO-TEX® STANDARD 100.
Should not be banned as long as it is not clear how it can be controlled.	Thank you very much for your feedback. The source of the recycled PET bottles will be checked thoroughly to have an effective ban of pre-consumer PET-bottles as source of recycled material.
it's a way to recycle anyway; the request of recycled PET is growing and the market needs as many sources of supply as possible	Thank you very much for your feedback. Pre-consumer PET bottles are an important source of fraud in the recycling scene. Moreover, pre-consumer PET bottles can be recycled to PET bottles in a circular manner. Therefore, pre-consumer PET bottles to textile recycling is not a form of recycling we would like to support. Pre-consumer PET bottles will therefore be banned from April 2025 in OEKO-TEX® STANDARD 100.*
Aujourd'hui cela reste une solution importante pour l'obtention de polyester recyclé textile. Supprimer cette option reviendrait à supprimer la certification à de nombreux textiles et produits qui rendraient cela encore plus confusant auprès des consommateurs. Mieux vaut vérifier et valider la provenance du PET que de supprimer cette option.	
we should not discourage any kind of recycling. already today it is easier to get certified by OEKO-TEX if new PES is used instead of recycled materials, which contradicts a bit the global direction of plastic use. If compliance is an issue, there should be other solutions found how this can be verified instead of just forbidding it.	
secondary raw is the future	
Oeko-tex is focusing on chemical risks, so the traceability should be controlled by another kinds of certification to avoid frauds. It's very important to not harm good praticies and companies that really care and do it well. This should not be banned by the Oeko-tex, as the consumer needs to know if the product complies with chemical restrictions.	Thank you very much for your feedback. Pre-consumer PET bottles are an important source of fraud in the recycling scene. Moreover, pre-consumer PET bottles can be recycled to PET bottles in a circular manner. Therefore, pre-consumer PET bottles to textile recycling is not a form of recycling we would like to support. Pre-consumer PET bottles will therefore be banned from April 2025 in OEKO-TEX® STANDARD 100. The source of the recycled PET bottles will be checked thoroughly to have an effective ban of pre-consumer PET-bottles as source of recycled material.
more control to avoid fraud risk	

Proposal 7

Proposal: Include sound absorbers as product we are certifying under OEKO-TEX® STANDARD 100.



Stakeholder feedback for disagreement	OEKO-TEX® response
They can be made from any combination of non-toxic materials, the actual product should not be banned. Since certain materials are going to be banned then the product will be made from materials which are not harmful.	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
As far as products, it is very difficult to find the sound from material or from the design. It should test final consumer goods.	Thank you very much for your feedback. Certifications under OEKO-TEX® STANDARD 100 special articles are only meant for final consumer goods. Sound absorbers have been added to the list of certifiable special articles.
No information on the exposure category they would be covered	Thank you very much for your feedback. The sound absorbance of those articles will not be certified, only that they are tested for harmful substances. Sound absorbers have been added to the list of certifiable special articles.
It is not clear what role the standard will play here, do the absorbers have a potential to create harm on human ecology?	Thank you very much for your feedback. Any article could contain harmful substances, which is why we test for them. Sound absorbers have been added to the list of certifiable special articles.
If implemented transaction certificate which can be approved by both suppliers and certifying authority. The manufacturer cannot be cheated their produced articles.	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
No proper clarification/chemistry can be found	Thank you very much for your feedback. For our next Public Stakeholder Consultation, we will ensure sufficient information for informed decision making.
Not relevant for us	Thank you very much for your feedback.
Only if the foam is latex or non-toxic. As many foams are not.	Thank you very much for your feedback. Any article could contain harmful substances, which is why we test for them. Sound



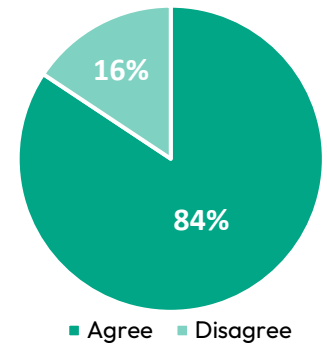
	absorbers have been added to the list of certifiable special articles.
STANDARD 100 is rather for apparel than for interior and sound absorbers are mainly foam not textile. It's rather a disagree, but a weak one, because I still can see the connection to STANDARD 100.	Thank you very much for your feedback. Certifications under OEKO-TEX® STANDARD 100 special articles are only meant for final consumer goods that derive somewhat from the scope of STANDARD 100 but can be tested. Sound absorbers have been added to the list of certifiable special articles.*
Sound absorbers are not a relevant material for OEKOTEX MARK	
To my opinion, it is a business decision by OEKO-TEX to enlarge the scope of STANDARD 100. Therefore I can not vote on this proposal. Apart from that, I'd like to ask, if sound absorbers would be included in the usual STANDARD 100 for textiles or in a separate requirement set of specific material usually not having contact with consumers. The reason for my question is, that the risk-assessment for human-health and the environment of sound absorbers is completely different to textiles for which a contact with consumers definitely exist or can be highly expected.	Thank you very much for your feedback. Certifications under OEKO-TEX® STANDARD 100 special articles are only meant for final consumer goods that derive somewhat from the scope of STANDARD 100 but can be tested. Sound absorbers have been added to the list of certifiable special articles. Please refer to the OEKO-TEX® STANDARD 100 special article standard version 01.2025 for more details about the testing scope.
Product do no fall under the direct use of human being that can wear or touch the part of body. Though it is made with textile base materials but ultimate use is not as textile that we consider for human use like garments or home textile.	Thank you very much for your feedback. Certifications under OEKO-TEX® STANDARD 100 special articles are only meant for final consumer goods that derive somewhat from the scope of STANDARD 100 but can be tested. Sound absorbers have been added to the list of certifiable special articles.*
Actually no opinion here, it depends on the know-how Oekotex has to carry out a risk assessment on these specific products, particularly since they are not falling under the same exposure category as other textiles products currently covered by the standard.	
Such products belong in the construction industry, which has its own standards that are not covered by the Ökotex criteria catalogue. In contrast, the Ökotext criteria catalogue contains numerous parameters that would not apply to such a construction product. In my opinion, this is not the right way to integrate construction products into the Ökotex criteria catalogue. One example that particularly distinguishes building products is the often necessary flame-retardant finish. This is prohibited by Ökotex, which in my opinion would be very counterproductive for building products	
Taking into account the purpose of the product, I don't think that Oeko tex certification is a differentiator.	
to put under another category	

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

Proposal 8

We have an exception for PFAS in our PPE standard as there are still no alternatives available.

Proposal: Extend the current exception to include all PFAS not regulated under REACH Annex XVII, Entry 68 for PPE.



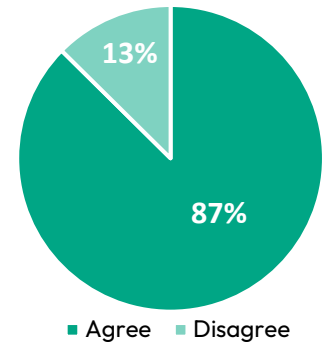
Stakeholder feedback for disagreement	OEKO-TEX® response
Nothing is worth someone's life, extending this used especially in our daily products means that someone somewhere is going to die due to their shampoo! How is that ok? We had shampoo before all this and humanity survived, there is NO need whatsoever!	<p>Thank you very much for your feedback. This proposal was specifically about PPE (personal protective equipment) which are not everyday wear and where the alternative to PFAS does not provide enough protection (e.g. firefighter or military uniforms)</p> <p>In those articles all not legally regulated PFAS will be allowed.</p> <p>A thorough check is performed to make sure that articles certified under the OEKO-TEX® STANDARD 100 PPE supplement are indeed PPE.*</p>
Not a good idea to broaden the use of PFAS.	
It could be very dangerous	
PFAS should be banned in general as long as long lasting effects are not known.	
PFAS are washed out during use of the PPE's as well as on all textiles and is polluting heavily our water resources.	
PFAS are harmful for humans and the environment. If legislation allows the use and product properties in PPE require these substances, this does not mean that you should support such products by labelling them according OEKO-TEX. Be strict and consistent. Stop these exceptions!	
why not keep a ban on PFAS and people can still choose to purchase PPE knowing it contains PFAS?	
This is the question that comes most often from our customers, and for our product, OEKO-TEX is not enough. And that's not ok.	
I think it will be very difficult to replace with a safe material and also it will be more expensive	
If we don't push then how do we make progress in finding alternatives?	
difficult to monitor	
The proposal is not in line with the upcoming legislation concerning PFAS substances.	
The PFAS should be restricted already, since they are dangerous to the environment	
PFAS recognised as dangerous to be maintain in the ban list, except when no alternative available yet	
I don't understand this proposal. If all PFAS are already exempted for PPE, why expand the exemption for all PFAS? I'm afraid this is a problem with the definition of PFAS - or the question is wrongly posed. Of course, the use of all PFAS must continue to be possible for PPE.	

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

Proposal 9

In addition to testing for legally regulated PFAS, we also analyze additional substances. These substances are categorized into four distinct groups, each with a specific cumulative limit.

Proposal: Consolidate all non-legally regulated substances into a single group labelled "Further PFAS" with a sum limit of 250 µg/kg.



The four existing groups are:

- Perfluorinated sulfonic acids
- Partially fluorinated linear alcohols
- Esters of fluorinated alcohols with acrylic acid
- Partially fluorinated carboxylic/sulfonic acids

Stakeholder feedback for disagreement	OEKO-TEX® response
The title "Further PFAS" is confusing. List out existing groups with sum limit	Thank you very much for your feedback. An extensive list of all tested PFAS is given in the OEKO-TEX® STANDARD 100 Standard.
Wait until the regulatory process in Europe is finalized	Thank you very much for your feedback. The above mentioned PFAS were already regulated under OEKO-TEX® STANDARD 100 and will now have the above-mentioned limit value. An extensive list of all tested PFAS is given in the OEKO-TEX® STANDARD 100 Standard.
Before consider all as one group, establish that they are all dangerous at the same level is necessary	Thank you very much for your feedback. An extensive list of all tested PFAS is given in the OEKO-TEX® STANDARD 100 Standard.
Restrictions should remain risk based	Thank you very much for your feedback. The above mentioned PFAS were already regulated under OEKO-TEX® STANDARD 100 and will now have the above-mentioned limit value. An extensive list of all tested PFAS is given in the OEKO-TEX® STANDARD 100 Standard.*
Since there is a relevant regulatory process currently in the EU, it is highly recommended to wait for the conclusions before taking unilateral decisions on PFAS. When the EU PFAS restriction proposal is fully finalised, it can be decided how to align in Standard 100. This creates a more stable and converged regulatory landscape for all stakeholders and would also help to avoid having to change the standard again with all the consequences in the supply chain	
Consider a sum limit that is even lower to avoid the use of PFAS and that the OEKO-TEX label is not supporting products and companies using PFAS.	Thank you very much for your feedback. An extensive list of all tested PFAS with their limit values is given in the OEKO-TEX® STANDARD 100 Standard.
I suggest not to include fluorinated substances which are not yet legally regulated or addressed via a regulatory proposal. For that, it makes sense to focus on the PFAS scope defined in the restriction intention on PFAS with respect to EU REACH Annex XVII (https://echa.europa.eu/de/registry-of-restriction-intentions/-/dislist/details/0b0236e18663449b). Furthermore, I recommend	Thank you very much for your feedback. The above mentioned PFAS were already regulated under OEKO-TEX® STANDARD 100 and will now have the above-mentioned limit value. An extensive list of all tested PFAS

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

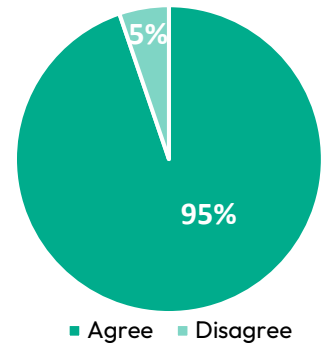
waiting until the regulatory process for the EU PFAS restriction proposal is finalized before including substances and requirements into OEKO-TEX(r) STANDARD 100. This is to avoid unnecessary overregulation within STANDARD 100, in cases where the regulatory process in the end comes to a different outcome or grants exemptions due to lack of alternatives or in essential use cases.	is given in the OEKO-TEX® STANDARD 100 Standard.*
Since there is a corresponding regulatory process going on in the EU, it would be advisable to wait for its conclusion before taking internal decisions on PFAS. As soon as the EU PFAS restriction proposal is finalised and agreed upon, it can be decided about how adapting it into the standard. This would also help avoid the risk of having to change again the standard because it contradicts regulatory conclusions.	
The current division into four groups is already pointless and completely arbitrary, and it also makes no sense to create another total limit that is not covered by any legal regulation. What makes sense in my view is to analyze PFOA, PFOS and later PFHxA as lead substances, since the strictest limits apply to these, and to also measure TOF or TF. Here it makes sense to lower the detection limit in order to get closer to the legal limits. This simplifies the analyses and also makes them cheaper. Measuring numerous individual substances or this new total limit makes certification even more expensive. The disadvantage, however, is that fluorinated dyes could also be detected, but this can be avoided by analyzing for these dyes in the case of a positive result.	
The Standard should be aligned in this point with other important product restricted substances lists (AFIRM, PRSL of brands)	
I am not sure about this, maybe keeping 4 groups gives more of an overview? But as mentioned before I maybe dont have enough knowledge in this field.	
I would still like to see the details of each substance even if they are not legally regulated.	
It is unclear what the merger's benefit is supposed to be. In general, the lowest possible detection limit for PFAS should be the threshold. The EU Drinking Water Directive sets a threshold of 0.5 µg/l for all PFAS.	
This substances are already controlled well by the Oeko-tex, consolidation of the "Futher PFAS" will complicate the understanding of the requirements, and makes that it seems that Oeko-tex does not concentrate on the real issues with PFAS and how to solve them.	
The limit might be too low for the sum of all further PFAS?	
The benefits of the merger remain unclear. As a general principle, the detection limit for PFAS should be set as low as possible. The EU Drinking Water Directive, for example, establishes a threshold of 0.5 µg/l for all PFAS.	

Proposal 10

REACH encompasses a group of substances that are associated with PFHxS, meaning they can degrade into PFHxS under certain conditions.

Proposal: Add two PFHxS-related substances with a sum limit value of 1 mg/kg to our criteria catalog:

- N-Methylperfluoro-1-hexanesulfonamide (N-Me-FHxSA), CAS: 68259-15-4
- Perfluorohexane sulfonamide (PFHxSA), CAS: 41997-13-1



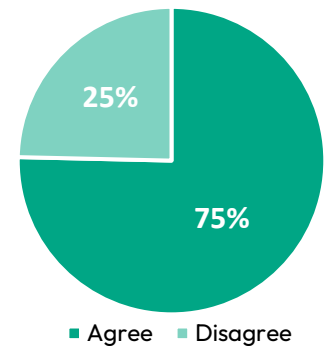
Stakeholder feedback for disagreement	OEKO-TEX® response
This should be banned altogether as it's use has such a extensive affects on humans longterm health and the environment both.	Thank you very much for your feedback. An extensive list of all tested PFAS is covered in OEKO-TEX® STANDARD 100.*
I agree to regulate these substances, but when introducing a sum limit make it even lower at around 250µg/kg. Products needing Fluorine components must not be certified by an OEKO-label. They are legal, ok, but do not support them with your eco label.	
I agree to regulate these substances, but when introducing a sum limit make it even lower at around 250µg/kg. Products needing Fluorine components must not be certified by an OEKO-label. They are legal, ok, but do not support them with your eco label.	
I don't see much sense in adding more and more individual substances of the thousands of possible PFAS.	
PFHxS has never been and is not used in the textile industry. An analysis for this substance and other substances in the sulfonic acid series is therefore completely pointless and increases the cost of the analysis	
We agree to add the two substances to the catalog. However, they should have a way lower sum limit value.	
We support including the two substances in the catalog, but their combined limit value should be set significantly lower.	

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

Proposal 11

Legal restrictions for PFAS are calculated based on a total fluorine limit value, with no exceptions currently allowed.

Proposal: Prohibit articles with fluorine from attaining a OEKO-TEX® STANDARD 100 certification, even if they do not contain any other harmful substances.



Stakeholder feedback for disagreement	OEKO-TEX® response
Fluorine is not a persistent chemical in itself, and it is typically bond in a high energy matter, so not in scope to be released.	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles. This is due to the analytical difficulties from distinguishing fluorine from PFAS and non-PFAS sources.*
Not all articles with fluorine are harmful for human health. Fluoropolymer fibers can be part of medical textiles which are approved by authorities. Textiles which are recycled may have been coated with PFAS.	
Yes but with limit value aligned with regulation limit values.	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles.
Fluorine content can be derivated from not harmful substances	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles. This is due to the analytical difficulties from distinguishing fluorine from PFAS and non-PFAS sources.*
unclear formulation, what's the definition for Flourinated non-PFAS substances Why ban substances which are not harmful	
Not justified. No reason to treat non-PFAS as PFAS because of the F content. Fluorine derivatives per se are not harmful substances	
It should not be neglected that fluorine is amongst the most prevalent elements on earth; restrictions in certifications should remain risk based.	
There is no scientific reason to treat non-PFAS substances as PFAS substances only because they contain fluorine. Fluorine is not automatically a "harmful substance" and its presence in a molecule is no direct indication of hazard, especially not of the same hazard associated with the most known PFAS. Substances other than PFAS should be considered according to their actual eco/toxicological profiles, and not through unfounded broad generalisations In addition, we have some questions : • What is the justification to impose a broad restriction on the intentional use of fluorinated non-PFAS substances? • What is the aim of the scope of the proposed restriction, which would impact not just genuine PFAS substances but also the intentional use of many other non-PFAS based products with numerous regrettable consequences? This proposed restriction would directly impact the widely-used state of the art (Best Available Technology) fluorinated reactive dyes for cellulosic fibres that provide multiple sustainability benefits Many of the most effective Reactive Dyes are based on trifluorotriazine which is used as a starting reactant in the manufacturing process of these dyes. Typically, those Dyes provide :- - Increased Operational excellence for the mill - Reduced impact on resources through water and	

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

energy savings - The highest fixation rate and consequently the lowest wastewater contamination - The best-in-class coloration performance - Increased colour durability leading to longer life of textile garments. - Economic sustainability The chemical structure of those colorants does not fall under the PFAS definition above but will result in a positive F-content (inorganic ionic fluorine) using the TF test method.	
Fluorine does not always origin from PFAS. There may be uses where the use of fluorine is justified.	
It can still be persistent and not biodegradable	
Not a priori ban products with fluorine but maybe put a limit value.	
needs to get fluorine in some apparels in allowed limit	
Requirement is too vague.	
How to find the safe one in packaging	
Wait to see where the industry goes.	
There are "harmless" substances that consist fluorine. Why ban them?	
We don't have enough knowledge in this subject.	
That is the question if the affect would not be that the compositions which are not harmful and can be included would be banned	
banning all fluorine containing chemicals - even if it is just one fluorine substituent - would be going too far in my opinion. It may make analytics easier, but may limit future product developments with novel materials.	
This proposal implies, that any substance containing fluorine is hazardous, which is an inadmissible generalisation as such. Furthermore, it implies that the assumed hazard always poses an unacceptable risk to consumers, which is an even more inadmissible generalisation. In my opinion, OEKO-TEX(r) STANDARD 100 should be entirely based on sound scientific evidence and not on assumptions.	
The purpose to get the Oeko Tex standard is to restrict from harmful substance. If there is no harmful substances then we have to allow articles with fluorine.	
There is no scientific reason to treat non-PFAS substances as PFAS substances only because they contain fluorine. Fluorine is not automatically a "harmful substance" and its presence in a molecule is no direct indication of hazard, especially not of the same hazard associated with the most known PFAS. Substances other than PFAS should be considered according to their actual eco/toxicological profiles, and not through unfounded broad generalisations.	
CATEGORY II PPE IS MANDATORY IN HIGH VISIBILITY THEREFORE FLUORANCE IS INDISPENSABLE (Translation from original comment)	Thank you very much for your feedback. Fluorine will not be banned in the OEKO-TEX® STANDARD 100 PPE supplement.
Some fluorine containing chemicals do not fall under the strict definition of PFAS (... fluorinated alkyl substances). And this should be still allowed, for example some specific reactive dyes.	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles. This is due to the analytical difficulties from distinguishing fluorine from PFAS and non-PFAS sources.

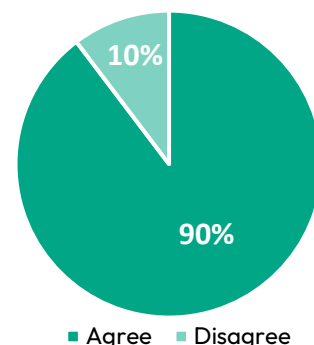


You have to be aware that you are then also banning some fluorinated dyes. If you take these limits, which is certainly better than analyzing many individual values, then if there is a first positive finding you should research or analyze whether these fluorinated dyes have been used	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles. This is due to the analytical difficulties from distinguishing fluorine from PFAS and non-PFAS sources. Moreover, fluorine dyes should have a limit value under the total fluorine limit value.
Some repellent finishes are only possible with the use of products that contain some fluorine. I believe that this list of products must be approved in advance by Oeko Tex	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles. This is due to the analytical difficulties from distinguishing fluorine from PFAS and non-PFAS sources.*
Basically there has to be differentiation between PFAS (perfluoroalkyl substances) and other fluoro containing substances. Otherwise sense comes into question. What about fluorine in tooth pastes on the market we use every day (Olaflur; NaF)?	
The question is unclear. We have interpreted two possible meanings. The answer to these interpretations are below: Interpretation 1: All OEKO-TEX Certificates will ban Fluorine content, even PPE Supplement. Answer 1: Disagree as PTFE and certain PFAS have applications critical to society with no known alternatives at this time. Interpretation 2: For OEKO-TEX(R) STANDARD 100 only, if the product passes all testing except Total Fluorine, it should still fail certification. We agree as OEKO-TEX(R) STANDARD 100 differentiating products for compliance with PFAS-free regulations is of value.	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles. This is due to the analytical difficulties from distinguishing fluorine from PFAS and non-PFAS sources. Fluorine will not be banned in the OEKO-TEX® STANDARD 100 PPE supplement.
It makes no sense for us.	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles. This is due to the analytical difficulties from distinguishing fluorine from PFAS and non-PFAS sources.
cf. PPE topic (Translation from original comment)	Thank you very much for your feedback. Fluorine will not be banned in the OEKO-TEX® STANDARD 100 PPE supplement.
As we all know there are multiple substances that contain fluorine but not PFAS used in textile industry. This is making the harm for the companies, as many of this solutions are not replaceable.	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles. This is due to the analytical difficulties from distinguishing fluorine from PFAS and non-PFAS sources.
statement is too unspecific to give a clear answer... what would be the total fluorine limit value?	Thank you very much for your feedback. No exceptions for non-PFAS sources of fluorine will be accepted in OEKO-TEX® STANDARD 100 certified articles. This is due to the analytical difficulties from distinguishing fluorine from PFAS and non-PFAS sources. The total fluorine limit value stays at 100 mg/kg.

Proposal 12

Proposal:

Add Resorcinol with a limit value of 1000 mg/kg in OEKO-TEX® STANDARD 100.



Stakeholder feedback for disagreement	OEKO-TEX® response
Restriction not scientifically justified	Thank you very much for your feedback. Resorcinol has been classified as substance of high concern in many different countries including the USA, France and Japan. It will therefore be restricted in STANDARD 100 certified articles.
In higher doses it can be toxic	
On what regulatory or hazard/risk basis?	
sorry do not know what resorcinol is what purpose it is for and if there are any alternatives	Thank you very much for your feedback.
I do not see a reason to ban resorcinol.	Thank you very much for your feedback. Resorcinol has been classified as substance of high concern in many different countries including the USA, France and Japan. It will therefore be restricted in STANDARD 100 certified articles.*
Depends on whether the Resorcinol is a harmful substance in some way	
I disagree, because I do not have sufficient information to make an informed decision. Can you please provide more and detailed information, why this change is proposed?	
What is the regulatory/ toxicological reason behind this addition? It is impossible to answer without knowing the background of the inclusion.	
I my eyes not relevant for textiles, but for tyres.	
"Resorcinol can be used to enhance the adhesion of rubber compounds as well as to reinforce fibre textiles". I doubt that this statement is true. Even if this substance were to be used in conjunction with rubber, I am not aware of any use in the textile industry, let alone in the clothing industry. This parameter, like several other parameters in the Ökotext criteria catalogue, would then be one of the substances that increase the cost of analysis because they are tested without any purpose.	
The Standard should consider this substance if it is taken up in the REACH SVHC candidate list.	
Unclear whether the question is banning the functional group or the molecule. Cannot agree without further context and understanding proposed testing scheme.	
We strongly support to add resorcinol to the standard. However, we do not agree wit the limit value of 1000 mg/kg, it is too high. Recorcinol is an endocrine disruptor and therefore it has no safe threshold.	
We strongly advocate for the inclusion of resorcinol in the standard. However, we find the proposed limit of 1000 mg/kg to be too high.	

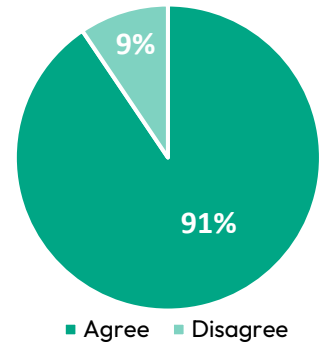


As an endocrine disruptor, resorcinol has no safe exposure threshold.	
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Proposal 13

Proposal: Change the Bisphenol limit values as follows based on our scientific findings:

- Bisphenol B: reduce from 1000 to 100 mg/kg
- Bisphenol S: reduce from 1000 to 100 mg/kg
- Bisphenol AF: introduce a limit value of 100 mg/kg
- Bisphenol F: introduce a limit value of 100 mg/kg



Stakeholder feedback for disagreement	OEKO-TEX® response
For leather products, BPS & BPF are very hard to reduce to 100ppm. This should be posted two years later.	<p>Thank you very much for your feedback. After consideration with toxicologists, we decided upon the following changes:</p> <ul style="list-style-type: none"> • BPA limit value decreased to 10 mg/kg • BPB limit value not changed • BPAF limit value introduced at 1000 mg/kg • BPS limit values not changed • BPF limit value introduced at 1000 mg/kg <p>For the OEKO-TEX® LEATHER STANDARD, BPF and BPS have been kept under observation.*</p>
The market still needs some time for transition to Bisphenol free.	
The proposal to reduce these limits are not justified	
We propose to wait for the final publication of the EU restriction to have an aligned limit in the textile industry and to keep the limit of 1.000 ppm for the time being.	
In general, we agree. Will there be an exemption for plastic parts, especially Polycarbonates? In the original restriction proposal, a limit of 150ppm for polycarbonates was stated.	
It must be gradually, 100 mg lower every year	
When exchanging heavy metal in products with less harmful substances, there is a need for an alternative fungicide. If the Bisphenol limits are lowered even more, it is impossible to find an alternative fungicide.	
Please provide first your scientific findings to give the participants the opportunity to make an informed decision. Apart from that, I strongly recommend waiting on the outcome of a future restriction proposal on BPA and bisphenols of similar concern and the conclusions of the regulatory process, before setting limit values which may not be justified. The corresponding proposal is announced and expected in the second half of 2025.	
Need to reduce gradually so that everyone shall have time to convert to alternate. Like 1000 to 700 or 500 mg/kg	
Not enough background information.	
"Change the Bisphenol limit values as follows based on our scientific findings": On which "scientific findings" from Ökotex is this suggestion based? I am not aware that Ökotex is conducting scientific research that could produce these limits. In addition, these limits would currently exclude entire textile groups from certification without any need. A stricter limit for BPA would make sense in order to take the American market into account, because on the one hand BPA is not used and on the other hand it does have a critical classification. This does not apply to the other bisphenols, which are sometimes used. In my opinion, only a limit of 1000 mg/kg for the other bisphenols currently makes sense.	

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

Recommendation: Keep Standard aligned with other product restricted substances list (eg. AFIRM) and EU regulation.	
we must give time to research and development to find substitutes that currently do not exist in the leather sector	
the limits in the product are not possible to ensure necessary performance of the fabric	
We welcome lowering the thresholds for Bisphenols. However, they are all endocrine-disrupting chemicals, and there is no safe threshold for endocrine disruptors.	
We welcome the reduction of thresholds for bisphenols. However, as all bisphenols are endocrine-disrupting chemicals, no safe exposure limit exists for them.	

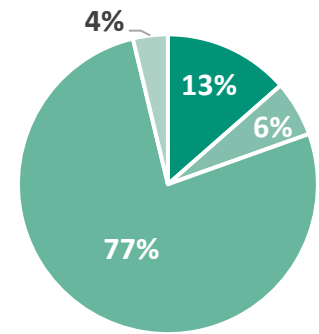
Proposal 14

Due to the upcoming amendment in the POPs regulation (effective end of February 2025), UV 328 will be subject to a new limit value of 1 mg/kg.

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Proposal 1: Reduce the limit value of UV 328 from 1000 mg/kg to 1 mg/kg

Proposal 2: Adjust the limit values of the other listed UV stabilizers (UV 320, UV 326, UV 327, UV 329, UV 350) from 1000 mg/kg to 100 mg/kg



- Agree with Proposal 1
- Agree with Proposal 2
- Agree with both proposals
- Disagree with both proposals

Indication for only agreeing with proposal 1

Stakeholder feedback for disagreement	OEKO-TEX® response
Concentrate changes on regulatory points, to avoid too much change	Thank you very much for your feedback. The changes have been implemented as outlined above. This adjustment was made to ensure compliance with regulations and to enhance safety.*
We are wondering what the background is of the new limit of 100 mg/kg in proposal 2. UV absorbers are typically deliberately added in the textile process in significant concentrations. Hence, we consider the existing limit of 1000 mg/kg as sufficient to prohibit any intentional use. Lowering the limit only increases the probability of detecting unintentional traces.	
OK for UV-328 to be in line with the POP regulation. For the others, since they are the active ingredients of UV-absorber formulations, they typically do not even meet the 1000 ppm limit on the textile article. Therefore a reduction to 100 ppm makes no difference. Better to stay aligned with the REACH SVHC limit	

Indication for only agreeing with proposal 2

Stakeholder feedback	OEKO-TEX® response
The step of the limit of UV 328 from 1000 mg/kg to 1 mg/kg is too big.	Thank you very much for your feedback. As this change is effective in the EU POPs regulation, we have decided to comply with it.
Gives the current status of technical best practice.	

Indication for disagreeing with both proposals

Stakeholder feedback	OEKO-TEX® response
Please only when there are alternatives to these products	Thank you very much for your feedback. The changes have been implemented as outlined above. This adjustment was made to ensure compliance with regulations and to enhance safety.

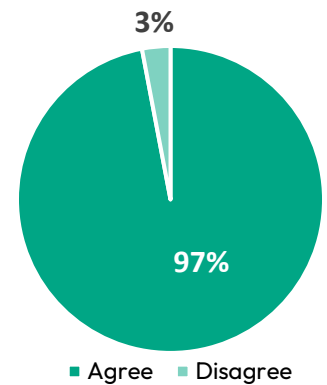
*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

<p>Some of these UV stabilisers are still needed in significant amounts to produce long-lasting products. If dosing has to be reduced this could result in faster replacement of products and hence more waste.</p>	<p>Thank you very much for your feedback. According to our data, a concentration higher than 1000 mg/kg is needed for effective UV stabilisation, therefore this change should not affect the longevity of certified articles.</p>
<p>We welcome both proposals to reduce the limit values of the substances. However, the proposed limits values are too high. Especially UV 328 should not be present in textiles at all, as it is a POP and regulated in the Stockholm Convention with NO exemptions for textiles (https://www.pops.int/TheConvention/ThePOPs/TheNewPOPs/tabid/2511/Default.aspx). An eco-label should not allow the use of Stockholm-listed chemicals and in general set higher standards than regulations.</p>	<p>Thank you very much for your feedback. The POPs regulation stipulates a limit value of 1 mg/kg which corresponds to the current scientific limitations in the analytical method.*</p>
<p>We appreciate the proposals to lower the limit values for these substances. However, the suggested thresholds are still too high. In particular, UV 328 should not be present in textiles at all, as it is a persistent organic pollutant (POP) regulated under the Stockholm Convention with no exemptions for textiles. An ecolabel should exclude chemicals listed in the Stockholm Convention and, in general, set stricter standards than existing regulations.</p>	

Proposal 15

We have detected glyphosate in all types of natural fibers that we have tested.

Proposal: Add glyphosate testing for all plant-based natural fibers, not just cotton.

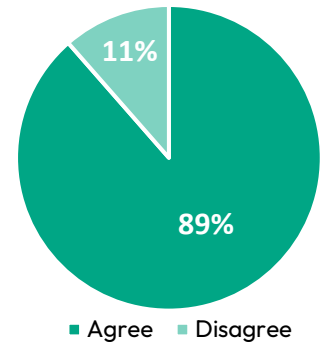


Stakeholder feedback for disagreement	OEKO-TEX® response
<p>No good alternatives</p> <p>Glyphosate is a biocidal agent that is often used in the cultivation of plant fibers to prevent infestation and avoid massive crop losses. I do not believe that Ökotex has found glyphosate in treated textiles. I would have to see the corresponding measured values for that. If the substance is really contained in raw fibers, it is washed out by textile finishing. In this respect, there is no risk to humans. The traces that end up in the wastewater during washing are significantly lower than the amounts that enter the groundwater through agriculture. In this respect, I see no need to increase the costs of analysis by conducting further analyses for glyphosate.</p>	<p>Thank you very much for your feedback.</p> <p>Thank you very much for your feedback. As you mention our findings are mostly on raw fibres. However, this does not mean that human safety is not at risk, even if glyphosate is washed out. The fact that glyphosate has been sued means that workers have been in contact with it and the fact that it washes out means that it will be found in waters that can then be drunk or used to wash people or food. Glyphosate testing will therefore also be done on natural fibres other than cotton.</p>
<p>We would see the contamination risk only by cellulosic natural fibers.</p>	<p>Thank you very much for your feedback. Glyphosate testing will therefore also be done on natural fibres other than cotton.</p>

Proposal 16

We have tested Methylisothiazolinone for several years under observation and have consistently found no traces of it.

Proposal: Remove Methylisothiazolinone from the OEKO-TEX® STANDARD 100 testing plan.



Stakeholder feedback for disagreement	OEKO-TEX® response
MIT is a hot topic in the cosmetics industry and still of concern. Maybe rather test for BIT and a group of isothiazolinones?	<p>Thank you very much for your feedback. Based on our internal research and external sources indicating uses that fall outside the scope of the OEKO-TEX® STANDARD 100 certification, we have decided to discontinue its observation under this standard. However, it will remain under observation for the OEKO-TEX® LEATHER STANDARD and ECO PASSPORT as we continue to collect additional data.*</p>
The minute you remove something, the manufacturers that are money oriented will sum up to using it, if we can about our world, we should not remove it.	
I would propose to keep observation of this substance.	
Other method?	
if there is no testing for it and therefore no holding manufacturers accountable, they might start using it again.	
still schud be used, so still should be in testing plan	
If you stop testing for Methylisothiazolinone you will be unable to detect traces of it if they are present.	
It is carcinogen and i m not sure , some formulators may use it again some day	
Best to monitor. We are trashing the planet so it's good to keep an eye on things	
maintain standards	
Continue with the testing because it might occur	
Periodic testing to monitor that it remains absent	
Is it in general relevant for the textile industry? If yes it should be part of the standard and not under observation. If it is not relevant at all, we could remove it. The fact that we did not find it does not imply that it is not potentially present in the future. I therefore would ask, if it is important or not. Again, I do not like to follow this logic. It would also mean that we remove e.g. legally limited substances when we do not find them.	
in america, depending on government, if trump is elected, or someone like that, there will be big changes and testing must be continued to detect changes that are harmful to us.	
It is possible that Methylisothiazolinone could begin to be used as a substitute for other products due to the fact that it is not yet regulated for textiles.	

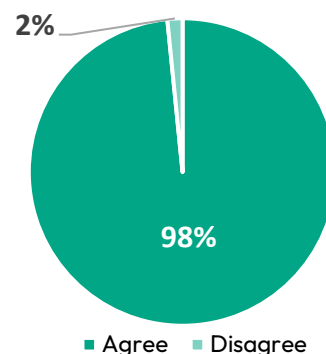
*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

Proposal 17

N-methylaniline was included in the EU's Community Rolling Action Plan (CoRAP) in 2019 in accordance with Regulation (EC) No 1907/2006 (REACH) as part of the substance evaluation.

Proposal:

Include N-methylaniline under observation in the OEKO-TEX® STANDARD 100.



Stakeholder feedback for disagreement	OEKO-TEX® response
Proposal raises some concern, since no further background information is given; we would be happy to get some insights and open to discuss our concern in direct contact	Thank you very much for your feedback. For our next Public Stakeholder Consultation, we will ensure sufficient information for informed decision making.
I would only agree to the inclusion if it does not increase the testing costs. Ökotex is happy to obtain information on whether this substance is relevant for textiles, which I do not believe	Thank you very much for your feedback.

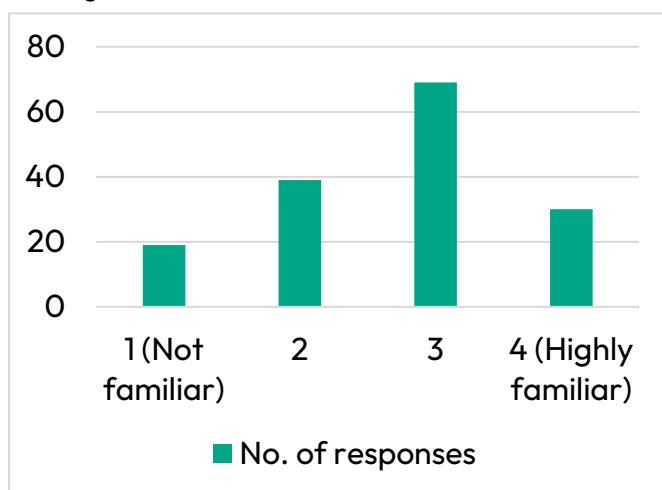
Role of certifications on due diligence

In recent years, the importance of due diligence obligations in global supply chains has increased significantly. With higher societal expectations, stricter laws, and a stronger focus on sustainable and ethical practices, companies now have to take responsibility for how their activities affect society, the environment, and the economy. This ensures that businesses act in ways that are good for people and the planet.

The feedback from our stakeholders on the role of certification in due diligence is important for guiding OEKO-TEX®'s business development efforts in this area. All comments will be considered in our upcoming discussions.

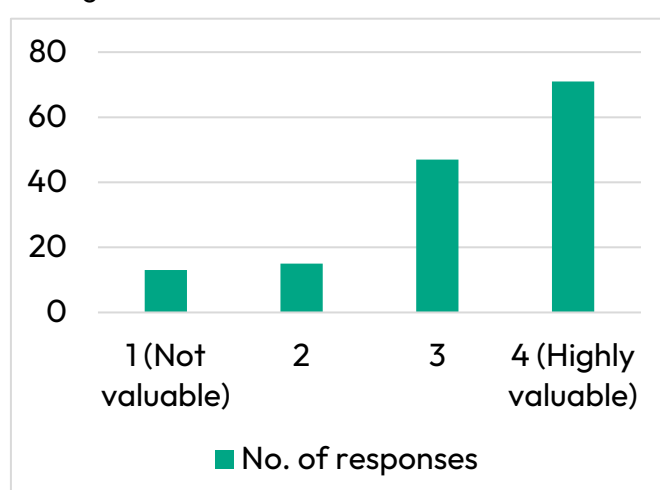
Familiarity with requirements and market developments on due diligence obligations

Average: 2.68

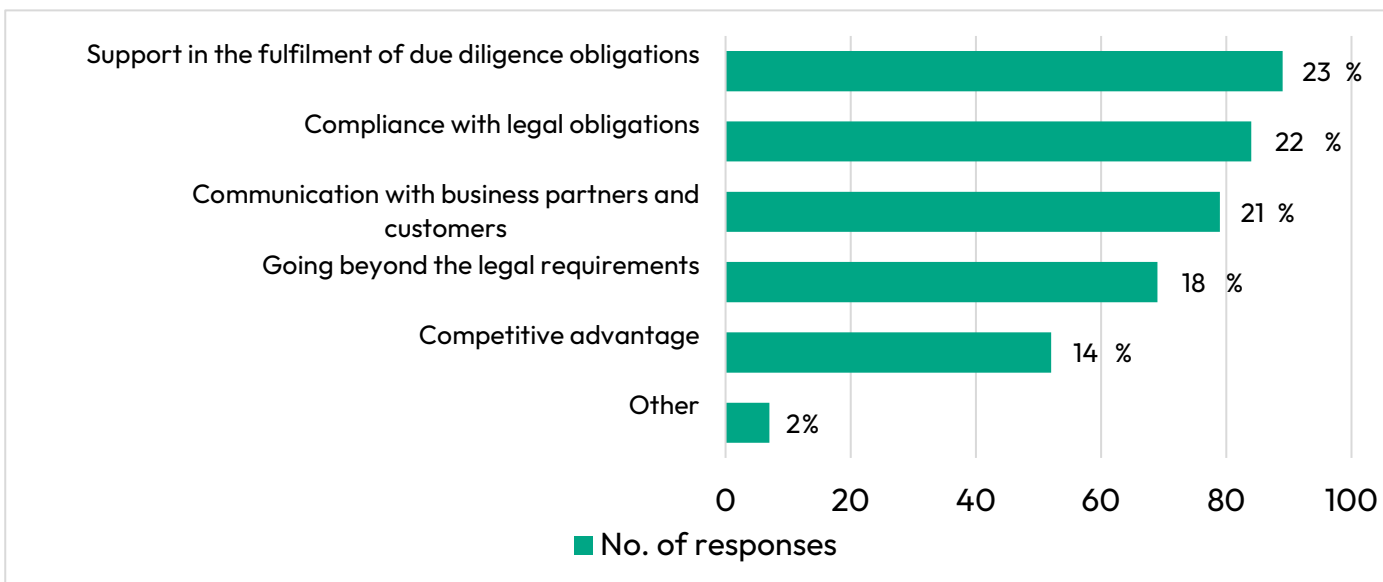


Value of 3rd party certification on the fulfilment of human and environmental due diligence

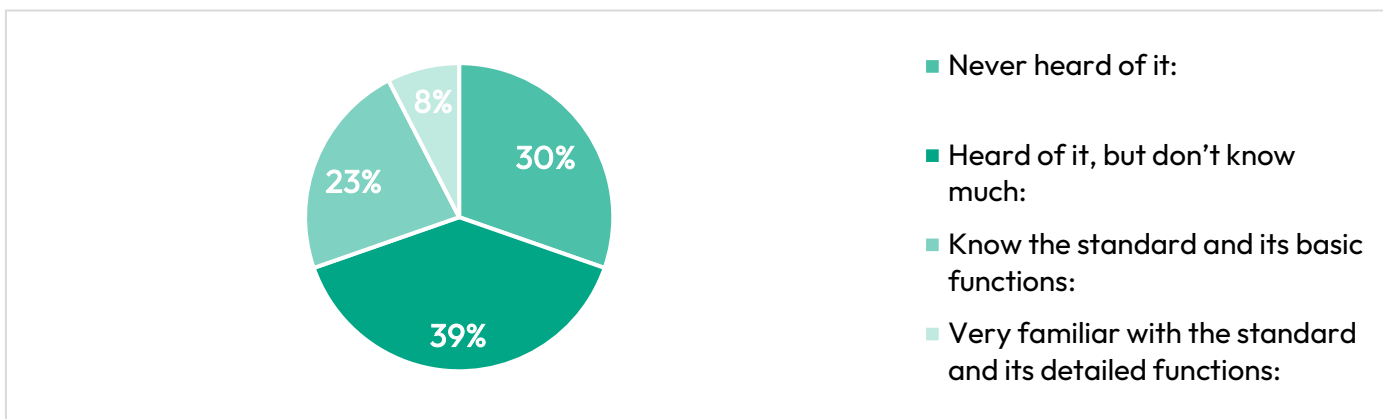
Average: 3.19



Reasons to choose a certification on human rights and environmental due diligence obligations



Familiarity with OEKO-TEX® RESPONSIBLE BUSINESS



How could OEKO-TEX® support the implementation of human rights and environmental due diligence obligations?

Stakeholder feedback	OEKO-TEX® response
By making people aware about it.	Thank you very much for your feedback. We will internally evaluate how and through which channels we can better incorporate active awareness-raising on that topic.
Please join forces with some of the other big organisations; Endconsumers can not overview or understand all the different certifications and standards, producers are drowning in different demands from different brands... As a brand we spend so much time and have huge costs for the different certifications we held, and no matter which certification we have the customers request another one. So please no more new standards...	Thank you very much for your feedback. We understand your concerns regarding the large number of certificates and statements. Please note that different certificates make distinct claims, and the needs of brands vary. Our institutes would be happy to advise you on OEKO-TEX® product that suit you. Independent consultants can provide further information and recommendations on additional certifications and labels.
Made conceptuable to everyone and every country	Thank you very much for your feedback. The due diligence approach followed by OEKO-TEX® RESPONSIBLE BUSINESS is independent of the country. However, legal requirements vary from country to country. Accordingly, through OEKO-TEX® RESPONSIBLE BUSINESS, you can achieve the due diligence coverage you need on an individual basis.
Human rights and environmental due diligence aims to protect the people and the planet by setting out the proactive steps that companies must take in order to avoid infringing on the human rights of others and on the environment, and addressing the adverse impacts with which they are involved.	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS we do provide a guided and structured approach to implement obligations and to communicate the fulfilment through certification. More information can be found here: OEKO-TEX® RESPONSIBLE BUSINESS .
OEKO-TEX® can support the implementation of human rights and environmental due diligence obligations acting as a key partner for companies seeking to ensure responsible practices throughout their supply chains. OEKO-TEX® help companies to systematically address and fulfill their due diligence responsibilities by providing certification programs, supply chain transparency, risk management techniques, training, aligning with international standards, and building consumer trust.	Thank you very much for your feedback. We totally agree.
ensure meeting legal and company obligations, and more importantly would give the consumer the confidence they are purchasing goods made to the right standards.	Thank you very much for your feedback. Our standards are updated annually based on legal requirements, research findings, test results, and stakeholder demands. We aim to make responsible decisions and protect natural resources.



It can provide stricter laws, and a stronger focus on sustainable and ethical practices.	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS, we support companies in implementing human rights and environmental due diligence obligations. Certified companies thereby promote sustainable and ethical procurement practices as well as production conditions within their own operations and across their supply chains. The implementation of OEKO-TEX® RESPONSIBLE BUSINESS goes beyond current legal requirements. Through annual updates to OEKO-TEX® RESPONSIBLE BUSINESS, we ensure that relevant legislations are incorporated into the ongoing development of OEKO-TEX® RESPONSIBLE BUSINESS, enabling customers to meet legal compliance requirements.
By preparing rules and regulations to fulfill human rights obligations	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS we do provide a guided and structured approach to implement obligations and to communicate the fulfilment through certification. More information can be found here: OEKO-TEX® RESPONSIBLE BUSINESS .
Maybe in the support for transparent supply chains in certificate and test sharing, MADE IN GREEN style certificates and/or respect (not only reduction in question numbers) for ISO 45001, SMETA, UN Global Compact, amfori BSCI and others.	Thank you very much for your feedback. Collaboration and alignment are essential to our approach. We will consider your suggestion in our upcoming discussions.
I believe that most people still don't know about OEKO-TEX or even heard of it, if they haven't heard of it, they have no idea what to look for nor how to protect themselves or all that matters to them.	Thank you very much for your feedback. We are committed to increasing awareness and improving our visibility among both the market and end consumers.
By aligning with international standards and frameworks, and provide tools to measure and tracks progress like SMETA audit we will love one single platform.	Thank you very much for your feedback. Collaboration and alignment are essential to our approach. We will consider your suggestion in our upcoming discussions.
with a certification that covers these topics	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS we do provide a guided and structured approach to implement obligations and to communicate the fulfilment through certification. More information can be found here: OEKO-TEX® RESPONSIBLE BUSINESS .
With webinars, tutorials, newsletters etc.	Thank you very much for your feedback. We will consider your suggestion in our upcoming discussions.



Spend more money on it	Thank you very much for your feedback.
OEKO-TEX® supports human rights and environmental due diligence by providing certifications that ensure textile products meet high safety, sustainability, and ethical standards. These certifications help companies comply with legal requirements, mitigate risks, and demonstrate commitment to responsible sourcing, ultimately promoting transparency and accountability in global supply chains.	Thank you very much for your feedback. We totally agree.
It create a framework that companies have to follow.	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS we do provide a guided and structured approach to implement obligations and to communicate the fulfilment through certification. More information can be found here: OEKO-TEX® RESPONSIBLE BUSINESS .
Wouldn't it be best to cover it with the STEP certification or - maybe make it a part of the STEP certification that can also get checked alone.	OEKO-TEX® provides a modular system of standards tailored to meet the unique needs of our diverse customers. As we continue to develop our standards, we will evaluate whether due diligence requirements can be integrated into the existing frameworks.
externe audits globally	Thank you very much for your feedback. As part of the OEKO-TEX® RESPONSIBLE BUSINESS certification, annual compliance audits are conducted. These audits are carried out by the globally represented OEKO-TEX® institutes and auditors.
Following the developments of related laws and standards	Thank you very much for your feedback. We continuously monitor legal changes and new regulations in relevant countries and incorporate them into the ongoing development of the OEKO-TEX® RESPONSIBLE BUSINESS Standard.
Providing guidance and visibility especially in regions where human rights is a major issue	Thank you very much for your feedback. We will consider your suggestion in our upcoming discussions.
Give training on site and on web and consult the one that will approach you on these topics	Thank you very much for your feedback. The definition of requirements and their simultaneous review unfortunately cannot be carried out by the same entity as OEKO-TEX® as this would lead to conflicts of interest and compromise the independence and credibility of the certification. However, we gladly welcome your feedback and will strive to explore possible solutions to address your stated needs in the future.

By helping companies to set up tailored mechanisms and practices to conduct due diligence throughout their supply chains	Thank you very much for your feedback. We will consider your suggestion in our upcoming discussions.
Requiring them in each OEKO TEX certification process and performing regularly audit; each year.	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS we do provide a guided and structured approach to implement obligations and to communicate the fulfilment through certification. More information can be found here: OEKO-TEX® RESPONSIBLE BUSINESS . The three-year validity of the certificate, combined with annual compliance audits, ensures the continuous fulfilment of the OEKO-TEX® RESPONSIBLE BUSINESS certification requirements.
Need to more involved to raise this issue	Thank you very much for your feedback. We will internally evaluate ways to enhance stakeholder involvement in our development processes. In the meantime, we encourage all stakeholders to share their insights by reaching out to us at info@oekotex.com .
It could be a new topic for a new Oeko-Tex certification or a part of a current certification.	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS we do provide a guided and structured approach to implement obligations and to communicate the fulfilment through certification. More information can be found here: OEKO-TEX® RESPONSIBLE BUSINESS .
We should create a list that explains which brands comply with the rules and which do not. We should have certain experts from certain countries provide information on this list and we should expose manufacturers who use unhealthy conditions in their production processes. In this way, each manufacturer has a report card and they can make their brand choices accordingly.	Thank you very much for your feedback. Our OEKO-TEX® Buying Guide is designed to assist you in selecting reliable partners and sourcing suitable raw materials. Additionally, the online directory provides end consumers with a convenient way to find OEKO-TEX®-certified products. We see potential to improve this tool and will consider your suggestion in our upcoming discussions.
include it into one certificate only, eg eco-passport	Thank you very much for your feedback. OEKO-TEX® follows a modular approach that allows it to address the individual needs of companies. This enables customers to remain flexible and decide which requirements they wish to meet on a case-by-case basis. However, we will take your point into account in upcoming discussions about the further development of the standard.



It should be recognized by other certification measures, or should replace them completely.	Thank you very much for your feedback. Collaboration and alignment are essential to our approach. We will consider your suggestion in our upcoming discussions.
OEKO-TEX® supports human rights and environmental due diligence by offering certifications like STANDARD 100 and MADE IN GREEN, which ensure products meet strict ethical and sustainability criteria. Their standards promote transparency in supply chains, encourage continuous improvement, and provide educational resources, helping companies comply with human rights and environmental regulations while building consumer trust.	Thank you very much for your feedback. We totally agree.
application of standards for OEKO TEX	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
provide current information about changes, legal requirements and services provided to customers	Thank you very much for your feedback. Transparency is key for us. We keep our stakeholders informed about regulatory developments, events and developments through our newsletter. If you're interested, we invite you to sign up: Newsletter .
As its part of Oeko tex compliance	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS we do provide a guided and structured approach to implement obligations and to communicate the fulfilment through certification. More information can be found here: OEKO-TEX® RESPONSIBLE BUSINESS .*
By implementation of compliance	
Compliance	
Having always an actual standard in alignment with the most relevant regulations on national level, but at least on international level.	Thank you very much for your feedback. Our standards are updated annually based on considering legal requirements, research findings, test results, and stakeholder demands.
Not sure, just beginning to design a line of apparel to keep persons cool in a warming planet, while observing practices to help the environment and work conditions worldwide.	Thank you very much for your feedback. Please note that OEKO-TEX® is a standard organisation and not a manufacturer or supplier of products.
Make sure the conditions and wages people work in are at a higher standard	Thank you very much for your feedback. The OEKO-TEX® RESPONSIBLE BUSINESS standard, along with our other certifications, is continuously evolving to address social and environmental priorities. One critical aspect of managing social risks is ensuring fair salaries. This issue is carefully evaluated in both OEKO-TEX® RESPONSIBLE BUSINESS and OEKO-TEX® STeP certifications. Currently, compliance with minimum wage

*Based on the similarity of the feedback, OEKO-TEX® provides an identical response.

	<p>requirements is mandatory, and we actively encourage companies to develop and implement strategies for paying living wages. These efforts are recognized and rewarded as part of our certification process.</p>
<p>1. Certification Standards Aligned with Human Rights and Environmental Standards</p> <p>2. Supply Chain Transparency and Traceability OEKO-TEX® certifications often require companies to demonstrate transparency and traceability in their supply chains. By expanding these requirements, OEKO-TEX® can help companies better manage risks related to human rights abuses and environmental harm.</p> <p>3. Risk Assessment and Mitigation Tools OEKO-TEX® can offer tools and guidelines to help companies conduct thorough risk assessments related to human rights and environmental issues.</p> <p>4. Capacity Building and Training To support the effective implementation of HREDD obligations, OEKO-TEX® can provide training programs for companies and their suppliers. These programs can focus on understanding human rights risks, environmental impacts, and best practices for due diligence.</p> <p>5. Monitoring and Continuous Improvement OEKO-TEX® can enhance its monitoring processes to ensure continuous compliance with human rights and environmental standards.</p> <p>6. Stakeholder Engagement and Collaboration OEKO-TEX® can facilitate dialogue between companies, workers, NGOs, and other stakeholders to address human rights and environmental issues collaboratively.</p> <p>7. Reporting and Disclosure OEKO-TEX® certifications could require companies to publicly disclose their human rights and environmental due diligence processes and outcomes.</p> <p>8. Supporting Compliance with Legal Frameworks As legal requirements for HREDD become more common, OEKO-TEX® can help companies navigate these regulations by aligning its certification standards with relevant laws.</p> <p>9. Affordable and Accessible Support for Companies To foster wider adoption and effective implementation of OEKO-TEX® standards, it is crucial to provide affordable and accessible support to companies, particularly in regions where financial resources are more constrained. For example, in Denmark, companies may hesitate to seek further information for OEKO-TEX® certification or explore additional certifications beyond OEKO-TEX® STANDARD 100 due to the high costs associated with inquiries, questions and services. By minimizing the costs of support services, such as consultations, audits, and additional certifications, OEKO-TEX® can encourage more companies to engage with and adopt a broader range of standards. This approach would not only expand the reach of OEKO-TEX® but also empower businesses to enhance</p>	<p>Thank you very much for your feedback. In developing OEKO-TEX® RESPONSIBLE BUSINESS, OEKO-TEX® has aligned with standards such as the UNGPs and the OECD Guidelines to establish a solid framework for the defined human rights and environmental requirements. Legal changes and updates are continuously monitored and incorporated into the standard's updates, ensuring that the standard always covers the requirements of relevant legislation. We will be happy to consider your feedback in the further development of the standard and the offerings provided by OEKO-TEX® and its institutes.</p>

their human rights and environmental due diligence without the barrier of prohibitive costs. Making support more accessible and affordable would ultimately lead to more robust and widespread implementation of sustainable practices across the textile and leather industries.	
To bound the manufacturer and brands	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
Provide free training for companies online and onsite and try to find the safe material in comparison with the unsafe one	Thank you very much for your feedback. As a standards organisation we are responsible for setting standards. To maintain impartiality and avoid any potential conflicts of interest, we are unable to both define certification requirements and offer consultation or training. However, we appreciate the importance of this matter and will conduct an internal review to explore potential approaches and appropriate channels to address it.
Create a certification process that included digital application (not 25 pages of printed paper for no reason) that is incrementally easier to understand and renews at least 2 years apart through a renewal application (not a brand new application).	Thank you very much for your feedback. At OEKO-TEX®, we are aware of these challenges and are actively working on our digitalisation.
Producing clear standards. Making it clear the benefits of compliance. Sharing with consumers who can also promote support. Communicating with stakeholders, corporations, and governments.	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS, we provide a standard setting high, but feasible requirements. We support companies in fulfilling their human rights and environmental due diligence obligations. We will consider your suggestion in our upcoming discussions.
set the highest of standards	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS, we provide a standard setting high, but feasible requirements. We support companies in fulfilling their human rights and environmental due diligence obligations.
sharing documents of good practices or accepting other certification SA8000	Thank you very much for your feedback. Collaboration and alignment are essential to our approach. We will consider your suggestion in our upcoming discussions.
By including it in the STeP and MADE IN GREEN standards.	OEKO-TEX® provides a modular system of standards tailored to meet the unique needs of our diverse customers. As we continue to develop our standards, we will evaluate whether due diligence requirements can be integrated into the existing frameworks.

By implementing a system that can be used for implementation and control of the EUDR.	Thank you very much for your feedback. We will take your point into account in our upcoming discussions.
As lead auditor & lead trainer	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
Implementing mandate of Oekotex in supply chain	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
MAKE THE INFORMATION AVAILABLE FOR THE PUBLIC TO UNDERSTAND IN AN EASY SIMPLE MESSAGE	Thank you very much for your feedback. The requirements and contents of the certification can be found in the OEKO-TEX® RESPONSIBLE BUSINESS standard document. Please visit our website OEKO-TEX® RESPONSIBLE BUSINESS for more information.
Increasing its visibility via Marketing, Lectures, Webinars and attendance at Trade Fairs	Thank you very much for your feedback. We will take your point into account in our upcoming discussions.
align with other already established certification schemes for that same purpose to agree on a mutual recognition of certifications - this will avoid a lot of cost and effort to maintain different certifications for different customers and may at the end lead to a higher level of compliance across the industry.	Thank you very much for your feedback. Collaboration and alignment are essential to our approach. We will take your point into account in our upcoming discussions.
sharing documents of good practices or accepting other certification SA8000	Thank you very much for your feedback. Collaboration and alignment are essential to our approach. We will take your point into account in our upcoming discussions.
From what I read and understand about OEKO-TEX due diligence that it support and strength the engagement of stakeholders through transparency and trust and complying with both social and environmental legal framework is always a business benefit for the whole global supplychain	Thank you very much for your feedback. OEKO-TEX® RESPONSIBLE BUSINESS pursues the human rights and environmental due diligence approach in accordance with the UNGPs and the OECD. The risk analysis and the consideration of relevant risks, their avoidance and mitigation play a central role and have a positive impact on the entire supply chain. The certification enables companies to publicly communicate the verification of fulfilment through an independent party.
Making it part of the certification. At-least start with basic need of human being and add clauses with the time.	Thank you very much for your feedback. OEKO-TEX® RESPONSIBLE BUSINESS is an independent certification that facilitates and

	verifies the implementation of due diligence obligations within companies and their supply chains.
By following the developments of corresponding laws or standards and implementing them in some form in the Oeko-tex certification schemes	Thank you very much for your feedback. OEKO-TEX® RESPONSIBLE BUSINESS pursues the human rights and environmental due diligence approach in accordance with the UNGPs and the OECD. Legal changes and updates are continuously monitored and incorporated into the standard's updates, ensuring that the standard always covers the requirements of relevant legislation.
Safety factors implanted in work environments	Thank you very much for your feedback. OEKO-TEX® RESPONSIBLE BUSINESS covers a range of risks, besides others, workplace safety which is also considered in OEKO-TEX® STeP that supports the fulfilment of due diligence obligations in a complementary way.
By adding the requirements stated under the Responsible business certificate to the certificate standards of Standard 100 as well.	OEKO-TEX® provides a modular system of standards tailored to meet the unique needs of our diverse customers. As we continue to develop our standards, we will evaluate whether due diligence requirements can be integrated into the existing frameworks.
Implement an audit.	As part of the OEKO-TEX® RESPONSIBLE BUSINESS certification, companies are obliged to undergo annual compliance audits to ensure they consistently meet due diligence requirements.
SPONSORING COMPANIES THAT PRODUCE AND USE ONLY OEKO-TEX FABRICS (Translation from original comment)	Thank you very much for your feedback. We will take your point into account in our upcoming discussions.
Ensure that Okotex DD requirements align with the current Amfori and Sedex requirements.	Collaboration and alignment are essential to our approach. We will take your point into account in our upcoming discussions.
By giving training	Thank you very much for your feedback. As a standards organisation we are responsible for setting standards. To maintain impartiality and avoid any potential conflicts of interest, we are unable to both define certification requirements and offer consultation or training. However, we appreciate the importance of this matter and will conduct an internal review to explore potential approaches and appropriate channels to address it.
OEKO-TEX® offers certification standards such as STANDARD 100, MADE IN GREEN, and STeP, which already cover various	OEKO-TEX® provides a modular system of standards tailored to meet the unique needs

aspects of environmental and social responsibility in the textile supply chain. By aligning these certifications with international due diligence frameworks, like the UN Guiding Principles on Business and Human Rights (UNGPs) or the OECD Due Diligence Guidance for Responsible Business Conduct, OEKO-TEX® can provide companies with a structured approach to meet their due diligence obligations.	of our diverse customers. As we continue to develop our standards, we will evaluate whether due diligence requirements can be integrated into the existing frameworks.
through a corresponding label. However, I would differentiate this from the textile certificate itself, as these are two separate topics. it can be a supplement.	Thank you very much for your feedback. We will consider your suggestions in the further development of the OEKO-TEX® RESPONSIBLE BUSINESS company certification, as well as in reviewing and enhancing the communication options for both the label and the certification.
They support this implementation via the label OEKO-TEX® STEP and the label OEKO-TEX® ECOPASSPORT	Thank you very much for your feedback. OEKO-TEX® RESPONSIBLE BUSINESS is an independent certification that facilitates and verifies the implementation of due diligence obligations within companies and their supply chains. OEKO-TEX® provides a modular system of standards tailored to meet the unique needs of our diverse customers. As we continue to develop our standards, we will evaluate whether due diligence requirements can be integrated into the existing frameworks.
Lobbying on EU level. Clear external communication and support of training in supplying countries like Asia, Turkey, Africa.	Thank you very much for your feedback. We will take your point into account in our upcoming discussions.
Nowadays, the textile industry already has to adhere to so many certification standards, that I think that these Due Dilligence requirements could be included in the STeP standard, thus avoiding yet another reference and more audits.	Thank you very much for your feedback. OEKO-TEX® provides a modular system of standards tailored to meet the unique needs of our diverse customers. As we continue to develop our standards, we will evaluate whether due diligence requirements can be integrated into the existing frameworks.
Every company must be visit regular like audits. Then auditor ask the due deligince	Thank you very much for your feedback. As part of OEKO-TEX® RESPONSIBLE BUSINESS certification, companies are obliged to undergo annual compliance audits to be able to demonstrate continuous fulfilment of the due diligence requirements.
SA8000 criteria could be implement	With OEKO-TEX® RESPONSIBLE BUSINESS we address the implementation of human rights and environmental due diligence obligations in companies and their supply chains. In doing so, OEKO-TEX® RESPONSIBLE BUSINESS goes beyond the requirements of SA8000. For more information about OEKO-TEX®

	RESPONSIBLE BUSINESS and other OEKO-TEX products, please visit our website OEKO-TEX® - for more sustainability in the textile and leather industry or get in contact with one of our associated institutes.
Textile customers are very inhomogenous in terms of requested/accepted standards. Within this situation it is unclear if OEKO-TEX® could support with a products (there are already multiple others).	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS, we already provide a standard to support companies in fulfilling their human rights and environmental due diligence obligations.
Valuable changes to the current state of certifications in Gore's opinion could include the convergence on a small number of trusted certifications which are agreed to by the industry, industry associations (Cascade), and seen by regulators as proving compliance with their laws.	Thank you very much for your feedback. We will consider your suggestion in our upcoming discussions.
Include easy/automatic reporting/filing to comply with all regulations, including US, and not just EU.	We continuously monitor legal changes and new regulations in relevant countries and incorporate them into the ongoing development of the OEKO-TEX® RESPONSIBLE BUSINESS Standard. Additionally, we closely follow legal developments regarding the fulfilment of fitness criteria to ensure that OEKO-TEX® RESPONSIBLE BUSINESS can be recognized as evidence of due diligence compliance.
Include it in the SteP certification	OEKO-TEX® provides a modular system of standards tailored to meet the unique needs of our diverse customers. As we continue to develop our standards, we will evaluate whether due diligence requirements can be integrated into the existing frameworks.
Alert companies to their benefits	Thank you very much for your feedback. We will consider your suggestion in our upcoming discussions.
Recycling (Translation from original comment)	Thank you very much for your feedback. Unfortunately, we are unable to understand how it relates to our proposal. As your identity is anonymous to us, we kindly ask you to reach out to us via info@oekotex.com to clarify your comment.
Cooperation with UN Global Compact or EcoVadis to not develop an additional standard	Thank you very much for your feedback. Collaboration and alignment are essential to our approach. We will consider your suggestion in our upcoming discussions.
Some points need to be analyse: risk assessment, wages, employee benefits, employee conditions, etc.	A key component of the OEKO-TEX® RESPONSIBLE BUSINESS certification is to conduct comprehensive risk analyses. Various risk factors are examined, including wages and working conditions of employees and workers. OEKO-TEX® RESPONSIBLE



	BUSINESS goes beyond legal requirements and is also aligned with the typical risks of the textile and footwear industry.
Please do not develop too many services. Otherwise it risks drowning the added value and credibility of your structure.	Thank you very much for your feedback. We will consider your suggestion in our upcoming discussions.
OEKO-TEX could play a crucial role in promoting ambitious human rights and environmental due diligence by setting standards that go beyond mere regulatory compliance. This would mean not just meeting minimum legal requirements, but actively pushing companies to implement best practices in labor rights, fair wages, and environmental protection. By adopting more stringent criteria and fostering transparency and accountability throughout the supply chain, OEKO-TEX can set a benchmark for truly responsible business conduct and help drive meaningful change in the industry. This includes setting clear standards for supply chain transparency, conducting independent audits, and ensuring that certified companies actively address labor rights, living wages, and environmental impacts. Additionally, OEKO-TEX could promote compliance by offering guidance and resources to help companies meet these obligations and by publicly disclosing information on adherence to these standards.	With OEKO-TEX® RESPONSIBLE BUSINESS, we establish high standards for companies seeking certification on fulfilling their due diligence obligations. Typical risks in the textile and footwear industry, as well as other significant social and environmental risks, are systematically analysed. It is specifically evaluated whether companies have implemented appropriate measures to prevent and mitigate these risks. This is not limited to a one-time assessment: companies are required to conduct continuous monitoring within their own operations and across their supply chains. In addition, annual audits are carried out to ensure compliance with the standard requirements. As a standardization organisation, our responsibility lies in defining norms and requirements. To maintain our independence and avoid potential conflicts of interest, we are unable to provide consultation or training while simultaneously defining certification requirements. However, we recognize the importance of this matter and will conduct an internal review to explore potential approaches and appropriate ways to address this issue.



General feedback

We asked the participants if there was anything else they would like to share with us.

Stakeholder feedback	OEKO-TEX® response
Thanks for all.	Thank you very much for your contribution.
We are very pleased with our Oeko-Tex Standard 100 certification; it's easy to communicate and understandable for the consumers, the producers understands it - as a brand we have through our certification process in 2016 got a great insight in our supplychain as well as we experience the procedures and tests in the Oeko-Tex certification process as serious.	Thank you very much for your feedback. We're glad to hear that you're satisfied with our certification.
While we can be prejudiced when determining the hotel we will stay in the countries we visit by looking at the number of stars, the lack of such a category in the textile industry is very inefficient. A classification and certification should be created based on the quality and standards of the companies. Brands should be able to choose the proper manufacturer through these lists. For example, there should be a difference between a company that cuts by hand and one that uses CNC.	Thank you very much for your feedback. We will take your suggestions up for internal discussions.
Focus on Oekotex Organic Cotton as it has very big business volume.	Thank you very much for sharing your perspective.
I think the main weak point of oekotex is the lack of traceability monitoring. Indeed the check point are far from the batch traceability which can allow a lot of mispractice from the certified company. Even if the products are then randomly tested I think the follow up of the certified product should me more rigourous by implementing a system as TC or NFT as TExtile exchange for exemple.	Thank you very much for your feedback. OEKO-TEX® is actively working on that topic.
The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.	Thank you very much for your feedback. With OEKO-TEX® RESPONSIBLE BUSINESS, certifying companies commit to respecting relevant human rights and environmental standards. They conduct regular risk analyses to identify actual and potential human rights and environmental risks, define appropriate measures to prevent or mitigate these risks, and evaluate the effectiveness of those measures. Furthermore, they provide remedies for any harm they have caused or contributed to and transparently communicate their risk management practices and outcomes.
Integration of climate change assessment into the OEKO-TEX® programs focused on carbon footprint of textile industry / products.	Thank you very much for your feedback. OEKO-TEX® offers the impact Calculator to its STeP customers, a tool to measure the carbon and water footprint. Information on the tool can be found here: Your Carbon and Water Footprint

<p>- The application process is very complicated especially when pre-certified materials and articles are concerned. It should be made more digitally, for example a platform where the applicant can 'create' the articles and add certain Oeko-Tex numbers. That way the additional efforts for the certificate holder of the pre-certified materials and their customers can be minimized for years to come . We often had the case that our Oeko-Tex certification body saw in the system that a certificate was renewed, but we had to ask our supplier again specifically for this, instead of being able to use the information already present in the Oeko-Tex system.</p> <p>- There are no resources other than the general standard documents and the logo guide available for brands/manufacturers. A lot of delay and confusion could be prohibited if there are some documents available that detail the rules and general handling of the application process, rules of certificate texts, how to check the validity of the certificates one receives etc.</p>	<p>Thank you very much for your feedback. OEKO-TEX® is actively working to address this issue. However, please note that there is some information we need to ask for every year to avoid certificate misuse.</p>
<p>Make your application forms much shorter and allow copy paste from previous application (product standards).</p>	<p>Thank you very much for your feedback. At OEKO-TEX®, we are aware of these challenges and are actively working on our digitalisation.</p>
<p>OEKO-TEX® not only helps with compliance but also drives industry-wide change by setting high standards for sustainability and ethical practices. Their certifications can enhance a company's reputation and marketability, making responsible choices more accessible and rewarding for both businesses and consumers.</p>	<p>Thank you very much for your feedback. We are pleased to hear about the positive impact of our work.</p>
<p>Need to know more upcoming events</p>	<p>Thank you very much for your feedback. We keep our stakeholders informed about upcoming events through our newsletter. If you're interested, we invite you to sign up: Newsletter.</p>
<p>I am a designer that specializes in non-toxic interior design. Oeko-tex is a very important certification for specifying textiles for my projects.</p>	<p>Thank you very much for your feedback. We're delighted to hear that our certificates play a valuable role in your work.</p>
<p>Who did ask? Was it Centexbel, Hohenstein and or the OEKOTEX brand/group itself?</p>	<p>Thank you very much for your question. The Public Stakeholder Consultation is conducted by OEKO-TEX®.</p>
<p>Thank you for all you are doing.</p>	<p>Thank you very much for your feedback.</p>
<p>DTI in Denmark requires money to inform about OEKO-TEX® services. This is the first time I have experienced that a sales person who was supposed to sell me something demands money to talk only about their products.</p>	<p>Thank you very much for your feedback. Interested parties can obtain information about OEKO-TEX® free of charge. However, the supervising institute may charge administrative fees when assisting customers, such as during the application process. If your inquiry does not pertain to these types of costs, please feel free to contact us at info@oekotex.com.</p>
<p>Awareness of manufacturer about this</p>	<p>Thank you very much for your feedback. We informed all our stakeholders about the Public Stakeholder Consultation and invited everybody to participate.</p>



<p>Thank you</p> <p>I have shared my concerns with TESTEX about these complaints for many years.</p> <p>For a company that is promoting an eco-position, it's absolutely inexcusable that Oeko-Tex renewal applications aren't digital and incrementally simpler. Why can we not log into a portal to answer checkboxes that apply to our renewals (that exclude things like leather which we have never applied for)? Why are there no fiber checkboxes rather than having to review and enter complicated and confusing fiber compositions?</p> <p>It's also very disappointing that the same 25 PAGE printed paper application is used for all 3 versions of certificate making it needlessly frustrating to keep them separate/organized. To say nothing of the new 'Organic' changes that will make the applications even more complicated.</p> <p>If Oeko-Tex insists on making everyone's lives harder & more expensive by splitting the certificates into 3 versions, the least you could do is spend your own time and money making three different applications and making them fillable online applications like virtually every other certification company.</p> <p>Add to that, you insist in North America to require renewal every year which is expensive, time consuming, and wasteful.</p> <p>We are committed to maintaining our Oeko-Tex certifications but your annual application process is severely outdated and unnecessarily antiquated for companies that are already certified. Lenzing's portal is fantastic and so easy to use. Plus Lenzing renewal is only every two years. Our annual Oeko-Tex renewal is a 3-4 month process, leaving only 8-9 months before we have to start again. For our vendors its the same thing and very expensive.</p> <p>We've heard that things are changing but they don't seem to other than making our application process 3 times harder by splitting organic and recycled onto a new application/certificate that make it more expensive.</p> <p>Even once we are certified, the buyers of our fabric have no ability to make a claim that they have made a point of paying more to purchase Oeko-Tex certified fabric unless they secure their own certification which is an expensive and unmanageable job for brands that can't afford to have staff dedicated solely to certifications.</p>	<p>Thank you very much for your contribution.</p> <p>Thank you very much for your feedback. At OEKO-TEX®, we are aware of these challenges and are actively working on our digitalisation. The annual certification renewal is essential to ensure continuous compliance with our standards. We will review the renewal process to identify opportunities for improving customer experience and making it more user-friendly.</p>
<p>Thank you for all you do! The work continues.</p> <p>keep up the great work</p> <p>Thank you for everything that you are doing, I am truly grateful with all my heart.</p>	<p>Thank you very much for your contribution.</p>

Stakeholder consultation is a highly appreciated tool!	Thank you very much for your feedback. We will continue using Public Stakeholder Consultations to involve our stakeholders in decision making.
Lower the limit value for siloxanes to 100 mg/kg to be able to meet tender requirements and for OEKO-TEX to be competitive with other standards such as EU Ecolabel and the Nordic Swan.	Thank you very much for your feedback. It will be considered for next standard updates.
It is important that the certification regarding the product (Standard 100) and the certification Responsible Business are kept separated. If you have used another certification to verify due diligens, then there is no intresent in paying for the "same" certification twice. A possible effect could be that suppliers stop using Standard 100 if they are forces to also use your certification on due diligens.	Thank you very much for your feedback. There are currently no plans to fuse OEKO-TEX® STANDARD 100 and RESPONSIBLE BUSINESS.
Keep doing what you are doing. Making it easier for small independent makers/designers like myself to use your certification on our products which have been made using the certificated materials and are manufactured locally following fairtrade standards etc. This will help spread the word from us small on the ground makers with the public and trade buyers.	Thank you very much for your feedback. Our modular system enables small companies to build on existing certificates. This significantly reduces costs, as the testing effort and costs are spread across several players in the supply chain. In addition, small companies can benefit from our network of over 35,000 certified partners, which helps them when sourcing materials and partners.
With respect to the section "Changes for OEKO-TEX® STANDARD 100" I'm not sure whether a simple 'agree'-'disagree' survey fulfils the high self- and quality standards of XX itself. I also recommend that the survey results be checked by an independent panel of experts to ensure that the statistical analysis of the survey is not falsified by possible campaigns by individual interest groups.	Thank you very much for your feedback. We will provide more information about the proposals at the next Public Stakeholder Consultation. Please be assured that our team is thoroughly analyzing all feedback received.
Yes, we always found difficulty to get the Oeko tex certified supplier list from website. This area need to improve. Countries, Industries, Product not properly filled although there are huge numbers of certified companies but searching and reaching to right producer is difficult.	Thank you very much for your feedback. We see potential for improvement of the OEKO-TEX® Buying Guide and will consider your input in our upcoming discussions.
I do not really believe that a survey in this form is a suitable way to collect sound feedback on the questions you asked. In detail: - There should be the possibility to comment even if one agrees with a proposal, since some additional consideration might be needed. In some cases, I would have chosen "agree", but I chose "disagree" just to be able to provide a more elaborated feedback; - At least a third option like "No answer" or similar (also with the possibility to comment) should be available, in case the person answering has not enough competence to agree or disagree; - Some questions do not give enough background information to understand the basis or the consequences of a change, which makes difficult to answer properly.	Thank you very much for your feedback. We will ensure to provide comprehensive information about the proposals at the next Public Stakeholder Consultation.
How can proper labeling of products be informed. Many online Businesses advertise oeko-tex certified but products have no	Thank you very much for your feedback. At OEKO-TEX® we have strict guidelines for



number or certification labels to support claim or to compare oeko-tex number to that advertised	labelling. All OEKO-TEX® labels require either a QR code or the label/certificate number. Please check out our OEKO-TEX® Labelling Guide for more information. Misuse of our labels is subject to legal action. If you become aware of any misuse, please contact us .
REGROUP COMPANIES IN THE TEXTILE SECTOR, OPEN UP A SUPPLY CHAIN FROM CONSUMER TO PRODUCER, BASED ON THE CIRCULAR ECONOMY, E.G. WE ARE LOOKING FOR PARTNERS WHO PRODUCE RECYCLED YARN AND TAKE BACK OLD CLOTHES, SO AS TO PROTECT THE ENVIRONMENT AND HEALTH. IT WOULD BE INTERESTING TO TALK ABOUT THIS. (Translation from original comment)	Thank you very much for your feedback. We are actively monitoring regulatory and market developments around Circular Economy and will consider your input in our upcoming discussions.
Scope certificates of Standard 100 are most of the time hard to read and can be interpret in the wrong way. It could be usefull to have a standardize way to write scope certificate for all. It would be easier and avoid misunderstanding.	Thank you very much for your feedback. We are currently working on an easier to comprehend scope that would still include all needed information.
it would be good to make a easy recognition between classic certificate or recycled oekotex certificate std 100 either through visual color or codification of the certificate, else it is confusing for the checking and supplier sent recycled certificate when we buy classic or the reverse. So we need clear distinction for manufacturer and customer	Thank you very much for your feedback. Currently recycling can easily be seen in the scope of the certificate.
It took me more than 15 minutes to answer all the questions in a professional manner, even though I believe, I am an expert in this field. In my opinion, when you approach experts, you should approach the survey with a realistic estimate of the time it will take.	Thank you very much for your feedback. We will try to give realistic time estimates at the next Public Stakeholder Consultation.
The operational handling of the Made in Green QR code is not good. Some of my customers would like to use the QR code on clothing or textile products. However, the 5-year regulation, for example, is no longer state of the art. Constant renewal of the QR code, how should the producers handle this operationally? In addition, the QR could be printed on the T-shirt, for example. The customer might also scan it after x years. I may want to find out about recycling. Could be a thought process. Then it says my T-shirt (QR code) is no longer valid. In my opinion, the concept with the QR code needs to be completely rethought. You have great products, but it's a killer for the producer. You could also store x number of other information for the end customer. Disposal, washing tips.....	Thank you very much for your feedback. We are aware of the challenges and will consider your input in our upcoming discussions. Furthermore, we are closely monitoring the developments of the Digital Product Passport for our own business development.
Thanks for the survey	Thank you very much for your contribution.
Renovate OEKO-TEX® STANDARD 100's role as leading standard in textile (apparel) industry as we experience increasing distraction of brands/customers towards other requirements/solutions. Consider besides form the EU also increasingly global legal requirements relevant for textile (apparel) industry.	Thank you very much for your feedback. OEKO-TEX® closely monitors relevant regulatory developments and integrates them into its business strategies to ensure the continued relevance of its services.
e need standardization and we do need to avoid duplication of audit on the same matter.	Thank you very much for your feedback. OEKO-TEX® works with other standard organisations to reduce audit duplication.

I do not understand OEKO-TEX's choice to require the multiplication of Standard 100 certificates depending on whether the products are made from conventional, organic and recycled materials. Because I think that the tests and the monitoring of traceability are independent of the certificate and we have the impression that it is just to make us pay more. Some companies that are certified today may not be able to continue to be certified because several certificates would be required, which have a cost that they will not be able to bear.	Thank you very much for your feedback. These decisions are taken for a traceability reason. That way, when someone buys a certified article they can be certain it was recycled (or is virgin) or that it contains organic cotton (or conventional cotton). This is unfortunately not possible without further labelling when different qualities are combined on one certificate.
Please try to reduce bureaucratic aspects to speed up the renewal procedures	Thank you very much for your feedback. OEKO-TEX® is actively working to solve this issue.
Our customers would love to have an updated MIG and also to do the STD100 online and not with PDFs. Thank you :)	Thank you very much for your feedback. OEKO-TEX® is currently working to solve this issue.
A constant problem with site visits is that traders really don't understand why we visit them. Often they have all their base certificates and invoices online available, the site visit is basically in their office (I once did one in the living room of the company owner) and this could have been done much more efficient with a quick (and cheaper) online meeting. Or there are customers where I've been for the third time, the company is very well organized, ISO certified, digitalized, they know their stuff - it would be really helpful if the institutes could offer these clients a cheaper and quicker way of checking on them. I suggest that OEKO-TEX should offer a self-assessment + webmeeting (with a reduced price) instead of an on-site-visit every second time if the company is a trader or the last site visit was without any obligations. This would also cut down travel, which is an environmental impact.	Thank you very much for your feedback. We are working on refining the site visit questions to better address the specific challenges and issues that may arise with traders.
more background information might be helpful	Thank you very much for your feedback. We will ensure to provide comprehensive information about the proposals at the next Public Stakeholder Consultation.
whatever you guys do please always consult indigenous people in areas where textiles are made, in areas where components are extracted for textiles.	Thank you very much for your feedback. We will consider your input in our upcoming discussions.
Clarity on where Oeko tex 100 fits in the value chain, is it a certification used to certify raw materials or processes which remove harmful substances from fabric materials?	Thank you very much for your feedback. STANDARD 100 is a certification for articles all along the supply chain. This includes finished articles like T-Shirts or bedsheets, as well as raw fibre, accessories (e.g. zippers, sewing thread, labels). It does not certify any processes.
We would like to recommend to list all locations on the scope certificate. Download section on the homepage could be easier accessible to ease the process of becoming certified.	Thank you very much for your feedback. We will consider your input in our upcoming discussions.
I had a complaint that was not answered by anyone. (Translation from original comment)	Thank you very much for your feedback. Complaint handling is an essential part of

	our quality management. We are constantly following up with the complaints we receive. Please share your complaint via our complaint form (Complaint form) and we will get back to you as soon as possible.
<p>If implementing transaction certificate for all OEKO-TEX brand can believe the product is safe.</p> <p>Many accessories used from uncertified suppliers and not even tested there is no guarantee that the article is safe.</p> <p>No inventory/quantity check during the audit.</p> <p>People can show any traceability documents for an audit. There is no sound good of showing the traceability documents of non OEKO-TEX order documents. People can show any documents just to clear the audit.</p> <p>There are many holes on the system of OEKO-TEX audit and documents verification process even testing in Hohenstein. To explain more please contact me</p>	<p>Thank you very much for your feedback. Quality management is key to us. We will reach out to you to better understand your concerns.</p>
<p>Concerning OEKO-TEX STD 100, I suggest to consider the possibility to increase to 3 years the certificate validity but expect 1 audit per year. Surely if company change something in its supply chain or chemicals used for, it must communicate it to the association</p>	<p>Thank you very much for your feedback. It is important to keep the certificate validity to 1 year as our standard is updated yearly. Moreover, most often there is a change in supplier within this year. Those renewals allow to check for changes in suppliers as well as to test for the new criteria.</p>
<p>The opportunity for all partners in the supply chain to be able to share their views in this consultation is very highly appreciated! We look forward to the outcomes and next steps in the process and to closer collaboration</p>	<p>Thank you very much for your feedback and your contribution. OEKO-TEX® invites everybody to participate in its Public Stakeholder Consultations.</p>
<p>OEKO-TEX® STANDARD 100 must remain irreproachable in order to protect human skin from chemical substances.</p>	<p>Thank you very much for your feedback.</p>
<p>PFAS is a very important yet complicated topic. Different testing institutes test different substances. There are different methods in discussion and they show different test results. The more substances are combined with a sum limit, the lower the LOQs must be. The legal scope changes. We hope the topic of PFAS will not be made more complicated by adding different expectations from different RSLs.</p>	<p>Thank you very much for your feedback. We will be more precise on PFAS testing in the updated standard.</p>
<p>For question 1: Simplifying product classes - We agree with the proposal but it is unclear to us what is the age range for "baby"? We would prefer that all apparel limits be lowered to the "baby" range as that would be the most protective, and then the other product ranges be lowered to the apparel level.</p> <p>For question 4: Label check - We agree with the proposal but it is to be carefully worded as unfortunately companies might say their glitter is not plastic-based but can contain some plastics and not be</p>	<p>Thank you very much for your feedback. For our next Public Stakeholder Consultation, we will ensure sufficient information for informed decision making. Resorcinol is used, for examples, in adhesives, as well as for the fabrication of dyestuff, thus we see it as relevant for the textile industry.</p>

fully biodegradable.

For question 8: PFAS exception for PPE - We left this empty, as we found the question to be oddly worded. Is the question about allowing additional PFAS to be used only for PPE? Our position is that minimal PFAS should be used and we would prefer that if PPE are being certified, that the company must do some due diligence about their PFAS usage.

For question 9: Grouping further PFAS - We agree with the proposal but would prefer a lower limit than 250 µg/kg.

For question 12: Resorcinol - We agree with the proposal in principle, but we don't see a reason why resorcinol is used in textiles, and thus don't think it should be approved at any level. Thus, if the options are between allowing it for Oeko-Tex at any level or restricting it at 1000 mg/kg, our answer is agree. But in practice, the answer would be disagree/not allow it at all.