



Textile Exchange Multiple Certification Policy

In the case that a site has been certified at the expense of a separate party, and that party owns the scope certificate, then the site can only sell certified goods to customers with the approval of the party owning the scope certificate.

RDS example: Allgood, a down and feather supplier has paid for Qualityfirst slaughterhouse to be certified to the RDS. Allgood therefore owns the Scope Certificate for Qualityfirst, and Qualityfirst can sell RDS down to Allgood. If Qualityfirst wants to sell to other customers then they will require written permission from Allgood, and this must be forwarded to the certification body involved.

If the site wants the ability to sell to other customers, without requiring approval, then they must own their own scope certificate.

RDS example: If Qualityfirst wants the freedom to sell RDS down or feathers to any customer, without needing approval from Allgood, they can choose to own their own scope certificate. If they have already been certified at the cost of Allgood, then they can negotiate to buy back the certificate, otherwise they will have to go through and pay for a separate certification process.

If another separate party wants to buy certified goods from the site, then they can also pay for the certification and own a separate scope certificate for that site.

RDS example: If Happycomfort, a bedding brand, decides that it want to certify its supply chain to the RDS, which includes Qualityfirst slaughterhouse (and assuming that Qualityfirst does not choose to own its own scope certificate), then they have the option to pay for a separate certification process for Qualityfirst. Both Happycomfort and Allgood will own scope certificates for Qualityfirst and will be in control of whether Qualityfirst can sell RDS down to other customers.

TE Policy Regarding Multiple Certifications

- TE allows for multiple certifications to the same standard of the same site, as long as the same Certification Body does them all.
- TE has no restrictions on who can own a Scope Certificate (SC) for a site.
- Each SC certification must be done separately, with a full inspection. TE will charge its regular fees for each certification.

For all cases, the TE policies will apply as:

1. A site cannot be certified to the same TE standard by more than one certification body.
 2. A site cannot be restricted from paying for and owning their own scope certificate.
 3. A site cannot be restricted from having one or more separate parties pay for and own scope certificates.
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Questions

1. Why does Textile Exchange allow for multiple certifications? It is not fair to the company who invested in getting the site certified in the first place.

Textile Exchange seeks to establish consistent and fair policies across all of its standards. To thus end, TE respects the directives of ISEAL and ISO, recognized international organizations providing expert oversight on the development and application of standards.

ISEAL Standard Setting Code

By adhering to procedures that constitute good practices for setting standards, standard-setting organizations help to ensure that the application of their standard results in measurable progress towards their social and environmental objectives, without creating unnecessary barriers to international trade.

The normative documents from which this Standard-Setting Code draws are ISO/IEC Guide 59 Code of good practice for standardization, and the WTO Technical Barriers to Trade (TBT)¹ Agreement Annex 3 Code of good practice for the preparation, adoption and application of standards.

6.1.2 Standards shall be no more trade restrictive than necessary to fulfill the legitimate objectives of the standard.

ISO 17065

¹ http://www.wto.org/english/docs_e/legal_e/17-tbt_e.htm

E. The standardizing body shall ensure that standards are not prepared, adopted or applied with a view to, or with the effect of, creating unnecessary obstacles to international trade.

This International Standard specifies requirements, the observance of which is intended to ensure that certification bodies operate certification schemes in a competent, consistent and impartial manner, thereby facilitating the recognition of such bodies and the acceptance of certified products, processes and services on a national and international basis and so furthering international trade.

4.2.2 The certification body shall be responsible for the impartiality of its certification activities and shall not allow commercial, financial or other pressures to compromise impartiality.

4.4.2 The certification body shall make its services accessible to all applicants whose activities fall within the scope of its operations.

4.4.3 Access to the certification process shall not be conditional upon the size of the client or membership of any association or group, nor shall certification be conditional upon the number of certifications already issued. There shall not be undue financial or other conditions.

2. What does Textile Exchange recommend as a strategy?

All cases of double or multiple certifications lead to increases in costs and complexity, which everyone will benefit from by avoiding. TE's suggestion is that in the case that a site is certified by a separate party, and where there is demand for certified material from more than one customer, that the site takes on ownership of its own scope certificate. This would involve a negotiation between the site and the initial owner of the scope certificate, or the site may simply pay for subsequent certifications.

RDS example: Referring to the scenario set up above, one option would be for Qualityfirst to 'buy back' their scope certificate from Allgood. Allgood would be able to recoup some or all of their costs for the certification (taking into account that they may have also invested in training). Qualityfirst would avoid going through a separate certification process, and would have full freedom to sell to RDS down to any customer, without the need for separation. Happycomfort would also avoid the cost of paying for certification and instead could offer to pay some of the costs for Qualityfirst to buy back their certificate

3. What happens if the sources that a site buys its inputs from are under separately owned scope certificates?

The best way to address this is through an example with the Responsible Down Standard:

- Allgood owns scope certificate 1 for Qualityfirst, as well as for farms A, B and C that supply this slaughterhouse.*
- Happycomfort owns scope certificate 2 for Qualityfirst, as well as for farms D, E and F.*

In this case, Qualityfirst would have to keep the down and feathers they receive from the different farm groups separated and identified as they move through their

operation. The down and feathers from ducks or geese from farms A, B, and C would be clearly marked, and kept separate for sale to Allgood. The same would apply for materials originating from farms D, E, and F – they would only go into the Happycomfort supply chain.

The ideal solution would be for Qualityfirst to own their scope certificate, and to either own the scope certificates of their farms, or have those farms own their respective scope certificates.

4. If a site gets a new certification for a separate scope certificate, do they need to go through a full audit and pay the full costs?

If the site has not received its certification within the last 3 months, then a new full certification will be required, including a site visit.

If the site has received its certification within the past 3 months, then the certification body has the authority to determine if the physical inspection is required, or the site can require one for their own reasons. If no physical inspection occurs, the certification body will still conduct a desk review, to confirm the results of the prior audit. In all cases, the site must be able to clearly demonstrate to the certification body that it has the procedures and personnel in place to separate out the certified inputs for the different scope certificate owners.

In the case that the additional certification does not require the physical inspection fee, the site will be charged the same amount as the first full certification. The certification body will remove their fees, then submit the remaining amount to Textile Exchange, to be used for the ongoing improvement and marketing of standards.

5. If there are two certifications done, several months apart, can they be combined in future years?

If there is the desire by all parties to combine certifications into a single audit for future years, then this can be done as long as that audit occurs before the date of expiry of the first certification.