



Guide to risk assessing your textiles products



This guide is designed to help you evaluate your operation and products to identify where there may be risk of non-permitted residue contamination and accidental mixing of organic and non-organic products. **All certified entities are required to have a risk assessment** in place that highlights any need for additional testing of quality parameters or for chemical residues.

“Certified Entities are expected to undertake testing in accordance with a risk assessment in order to assure compliance with this Standard and in specific with the criteria of Section 2.4.14 (Technical Quality Parameters) as well as 2.4.15 and 2.4.16 (Limit Values for Residues in GOTS Goods, additional materials and accessories). All GOTS Goods, the components of these products and the inputs used are to be included in this risk assessment and therefore potentially subject to testing. The testing frequency, the type and number of samples are to be established according to this risk assessment.”
- (GOTS Manual 4.2)

It is important that you carry out a risk assessment for each of your organic products. The risk assessment should include any potential risks, how significant the risk is, mitigations you have to protect against the risk and what testing may be needed and the frequency of the testing. Where a risk is identified, you **must** undertake relevant residue or quality parameters testing to ensure your products comply with the GOTS standard.

When considering a risk assessment, this guide will help establish what testing you should put in place, the frequency of these tests and the number of samples to take. If your products are tested under any other residue testing scheme (such as Oeko-tex) please include this in the risk assessment, as this could help you assess some contamination risks. If undertaking testing, you must use a lab which is accredited to EN/ISO 17025 or equivalent. Your risk assessment will be checked alongside any relevant test results at your inspection. Your products may be subject to random sampling and testing by our inspectors.

Risk Factor 1 – Organic integrity

- Are your GOTS certified products stored separately from non-organic products?
- Are your staff trained in handling organic goods including maintaining separation?
- Is there a risk of contamination with non-organic products during shipment?
- Has organic integrity been maintained previously in the supply chain?
- Is machinery thoroughly cleaned/purged before any organic runs?

Risk Factor 2 – Chemical residue in GOTS goods

- Are prohibited substances listed with limit values in Section 2.4.15 used in the washing, bleaching, dyeing, printing, or finishing process?
- Has your supplier(s) covered the above risk substances in their processing steps? E.g by analysis to ensure the limits are not exceeded.
- If you are processing non-organic products on your site using inputs not approved to GOTS, is there a risk these could have mistakenly been used to on your organic products? Or could cross contamination have occurred?
- Do any of your GOTS products contain chemicals only permitted in restricted quantities and if so, can you guarantee you do not exceed these allowed quantities? (See GOTS manual 2.4.15)
- Have you done testing to prove any machine oils used do not contain heavy metals?

Risk factor 3 - Organic fibres used

- Are all your organic fibres certified according to the GOTS standards?
- Do you have reason to believe there could be pesticide or GM contamination of your fibre?
- Could your organic fibres have been substituted with conventional fibres?
- If processing wool, have sheep been managed as organic for 12 months before shearing? Has a period of three months (or three times the legal withdrawal period, whichever is greater) between

the last treatment with an external veterinary treatment and shearing been observed? Have synthetic pyrethroid treatments been used in the last 12 months?

Risk factor 4 - Quality parameters

- Have you tested your products against the technical quality parameters referenced in the GOTS manual 2.4.14?
- If not, do you hold test results from your immediate supplier?

Risk factor 5 - Accessories and additional materials

- Are all accessories and additional materials used permitted in GOTS certified products?
- Could any natural materials used be synthetic imitation fibres?
- Have you evidence to demonstrate that accessories and additional materials meet the GOTS residue requirements, and has SA Certification approved these?

Risk factor 6 - Transport and Storage conditions

- Have any pesticide/biocide treatments been used which may not comply with organic production standards?

Below are examples of what a risk assessment might look like for different businesses supplying GOTS goods.

Traders & Retailers:

Risk	Description	Scale of risk	Procedure/practice to mitigate risk	Type of testing required	Frequency of testing
Contamination during processing.	During the cut, make and trim stage of processing, GOTS goods are compromised with residues from conventional processing.	Low	Supplier is GOTS certified and is dedicated to GOTS production. Testing is carried out by the supplier. New products are always tested, and final products of repeat lines are tested at random every 3 months. We hold all test results on file. Any suspicion of non-compliance would result in quarantining the goods until further testing can be completed or confirmation of compliance is guaranteed.	Residue testing of finished goods.	Final products are selected at random for testing at 6-month intervals.
Contamination at UK storage site	Products stored at UK warehouse are compromised with residues from conventional products.	Low	Warehouse is GOTS certified and has dedicated storage for GOTS products. Products are individually packaged and labelled with the GOTS signs.	Residue testing of finished goods.	Only when we have suspicion of non-compliance.
Risk of fault in manufacturing that results in failure to meet GOTS	During the cut, make and trim stage of processing.	Low	Supplier is GOTS certified, and testing is carried out by the supplier. New products are always tested, and final products of repeat lines are	Risk of fault in manufacturing that results in failure to meet GOTS	During the cut, make and trim stage of processing.

Technical Quality Parameters.			tested at random every 6 months. We hold all test results on file. Any suspicion of non-compliance would result in quarantining the goods until further testing can be completed or confirmation of compliance is guaranteed.	Technical Quality Parameters.	
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Processors & Manufacturers:

Risk	Description	Scale of risk	Procedure/practice to mitigate risk	Type of testing required	Frequency of testing
Contamination during processing.	During the assembly of the product, GOTS goods are compromised with residues from conventional products.	Medium	GOTS products are manufactured on separate lines to conventional products with cleaning procedures and staff training in place to ensure that organic and conventional fibres do not come into contact.	Residue testing of finished goods.	We send 5 products to be tested every month, selected from random batches. Results are kept on file.
Risk of raw materials exceeding residue limits.	GOTS raw materials contain residues of pesticides.	Medium	All GOTS raw materials are bought from GOTS certified suppliers. Testing is carried out by the supplier at 3-month intervals and test results are kept on file.	Residue testing of finished goods.	Sample of raw materials sent for testing every 6 months.
Risk of fault in manufacturing that results in failure to meet GOTS Technical Quality Parameters.	Fault in assembly of the product.	Low	All products are quality checked by internal QC. Procedure in place to ensure that any products that do not meet the quality standard do not continue to be labelled for shipment.	Technical Quality Testing.	Every batch is tested for quality by an external testing body, results are kept on file.

Further Information

Please return your Risk Assessment via the Soil Association Portal.

For any questions regarding the Risk Assessment please email fashion.textiles@soilassociation.org