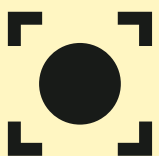


Practical guidance for reviewing GOTS/GRTS-related claims and communications



**GLOBAL
STANDARDS**

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PRACTICAL GUIDANCE FOR REVIEWING GOTS/GRTS-RELATED CLAIMS AND COMMUNICATIONS

I. Introduction

This document provides practical guidance for anyone making statements, claims, or other communications relating to GOTS/GRTS certified goods, GOTS/GRTS certification, or GOTS/GRTS certified entities.

As regulatory expectations for environmental and sustainability-related communications continue to evolve, particularly following the adoption of the EU Empowering Consumers for the Green Transition (EmpCo) Directive, organisations are expected to ensure that claims are clear, accurate, specific, and appropriately substantiated.

The purpose of this document is to support that objective by providing a practical framework for the review of claims before publication. The framework is designed to help identify potential risk areas, assess the clarity and accuracy of communications, and consider whether additional clarification, evidence, or revisions may be needed.

The guidance is intended as an orientation and self-assessment tool. By following the proposed review process, users can evaluate claims in a structured manner and support transparent and consistent communications relating to GOTS/GRTS. Ultimately, the objective is to help protect credibility, integrity, and value of GOTS certification.

Note: This guidance reflects Global Standards' understanding of relevant European legislation and regulatory developments at the time of publication. As legal requirements, regulatory interpretations, and enforcement practices continue to evolve, this guidance may be amended or updated.

II. Document Structure and Use of the Framework

To facilitate its use, this document distinguishes between two categories of claims:

- Pre-approved claims which are set out in Chapter III. The pre-approved claims may be used as provided.
- All other claims, which should be reviewed using the self-assessment framework set out in Chapter IV before publication.

The next chapter provides a closed list of pre-approved claims, together with examples of unacceptable claims that address some of the most common communication errors.

Any claim that is not expressly covered in those sections should be assessed using the self-assessment framework set out in the Chapter IV. The self-assessment process follows a risk-based approach that helps users focus their review on the claims most likely to raise compliance concerns and supports clear and accurate communications relating to GOTS/GRTS.

To support its application, the framework includes practical examples for illustration purposes set out in Chapter V. These examples are intended as guidance only.

III. Pre-Approved Claims

This chapter provides a closed list of pre-approved claims that may be used as provided. It also highlights examples of unacceptable claims that do not accurately reflect the scope or meaning of GOTS/GRTS certification and therefore should not be used.

To ensure correct use of the GOTS/GRTS logo, GOTS/GRTS Signs, and related labelling requirements, please consult the “Conditions for the Use of GOTS Signs”, “*GRTS Conditions for the use of signs*” and the Labelling Tool available on the Global Standards website.

The following claims may be used as provided:

- “This product is GOTS-certified.”
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- “This product is GRTS-certified.”
- [For GOTS only] “This product is made with x% organic / organic-in-conversion materials.”
- “We carry GOTS-certified items - look for the GOTS label on the product listing.”
- “We carry GRTS-certified items - look for the GRTS label on the product listing.”
- “We are GOTS certified, [Certification Body Name] [Certification Number].”
- “We are GRTS certified, [Certification Body Name] [Certification Number].”

While the claims above have been pre-approved for use, the examples below based on GOTS certification illustrate common communication errors that are not allowed in communications. These claims do not accurately reflect the scope or requirements of certification and may therefore create a misleading impression:

- “GOTS cotton” “GOTS-certified organic cotton”

Why it’s incorrect: GOTS is not an organic cotton standard. GOTS certification covers the processing of textile goods made with organic fibres — not raw cotton itself. Organic raw fibres must be certified by an accepted external organic certification before they enter the GOTS chain of custody.

- “Made with GOTS-certified fabric/yarn/other components”

Why it’s incorrect: Partial certification cannot be represented as full product certification. If GOTS-certified fabric is sewn in an uncertified facility, the chain of custody is broken, and the final product is not considered certified.

IV. Claims Self-Assessment Framework

The self-assessment framework is intended to help identify potential risk areas and ensure that communications and claims relating to GOTS/GRTS are clear, specific, accurate, and supported by verifiable evidence. While not every claim will raise concerns, following these steps can help reduce compliance risks and support credible and transparent communications.

Maintaining clear and well-substantiated claims is not only a matter of compliance. It is also an important part of our shared commitment to protecting the credibility, integrity, and value of GOTS/GRTS certification.

The review process consists of four steps, beginning with general communication principles applicable to all claims and progressing to claim categories that may present higher levels of compliance risk.

Note: any person or entity using this self-assessment framework remains solely responsible for any claims they make and for ensuring that such claims comply with all applicable legal and regulatory requirements in the

jurisdictions where they are used. Compliance with this guidance does not in itself guarantee compliance with applicable laws, regulations, or regulatory expectations. Nothing in this guidance constitutes legal advice.

STEP 1: General Communication Principles

Communication Process: Consumers must immediately understand what is being claimed.

Check:

- Will the audience group immediately understand what is being claimed?
- Is the claim truthful and accurate?
- Is the claim specific?
- Is it free from vague or overly broad wording?
- Is there only one reasonable way to interpret it?

No? Revise the claim before publication. Make it clearer, narrower or more specific.

Yes? Proceed to Step 2.

Why this matters: If a claim can reasonably be interpreted in different ways, it may create compliance risks even if it is technically correct.

STEP 2: High-Risk Claims

EmpCo Compliance Review

Communication Process: This step is intended to identify and assess high-risk claims that are already subject to significant regulatory scrutiny, such as generic sustainability, future-oriented, absolute, legal compliance, and scope related claims.

Check whether the claim involves:

- **Generic sustainability claims:** Does the claim include broad terms that have no scientific definition or cannot be adequately demonstrated, verified or certified? (i.e. green, sustainable, eco, friendly, preferred, ...)
- **Future commitments or aspirational claims:** Is there a credible and sufficiently substantiated plan showing how this commitment will be achieved? (i.e. all our products will be certified by 2035)
- **Absolute Claims:** Does the wording imply that there are no limitations, exceptions or uncertainties? (i.e. harmless, chemical-free)
- **Partial/Scope related claims:** Might the claim lead consumers to assume a benefit applies to the entire product selection or organisation when it only applies to part of it? (i.e. creating impression that the collection is GOTS/GRTS certified, while only some garments are)
- **Claims based on legal compliance:** Is a legally required characteristic being presented as a special benefit? (i.e. compliance with substance restrictions under REACH is mandatory and should not be presented as an additional GOTS/GRTS-specific advantage)

YES: High-Risk Issue Identified? Revise the claim.

No issue? Proceed to Step 3

Why this matters: These claims often present the highest compliance risk under EmpCo because they are likely to mislead consumers if they are vague, absolute, unsupported, or fail to clearly communicate their scope. are broad, lack clear definitions, and can be understood differently by consumers.

STEP 3: Medium-Risk Claims

Broader Compliance & National Rules

Communication Process: Claims that are not expressly prohibited but may create a misleading impression because they rely on common industry practice or concepts without a clear definition.

Check whether the claim is based on:

- **Common Industry Practice:** Is a characteristic being presented as a special benefit even though it is already standard practice in the sector? (i.e. our facilities are audited to check compliance)
- **Broad or undefined concepts:** Could consumers understand the terminology differently from sustainability or textile-sector professionals? (i.e. dangerous, harmful or hazardous chemicals)

Potential misleading impression? Revise the claim

No concern? Proceed to Step 4

Why this matters: Some claims may be factually correct but still mislead consumers because common industry practices or terms may be unclear or interpreted differently by consumers than by industry professionals.

STEP 4: Emerging risk review

Certification & Comparative Advantage Claims

Communication Process: Claims that may face increasing scrutiny as enforcement develops, particularly where they suggest an environmental or social advantage over other products, certification schemes, or market alternatives.

Does the claim imply inherent superior or a comparative advantage?

Pay particular attention to claims vaguely suggesting that GOTS/GRTS certification, the GOTS/GRTS good or the certified entity is better than

- non-certified products?
- other certification schemes?
- industry averages?
- common market practice?

If yes: Ask: Can the claimed advantage be demonstrated with robust, verifiable evidence, such as independent comparisons, market studies?

If no: Revise claim

If yes: All relevant checks passed.

Why this matters: Claims about certification are generally lower risk when they accurately describe certification status or requirements. Greater care may be needed where communications imply an advantage over alternatives. This review helps support clear, accurate, and credible communications.

V. Illustrative Examples

The examples below are provided for illustrative purposes only. They are intended to demonstrate how the self-assessment framework can be applied in practice and should not be regarded as confirmation that similar claims will comply with applicable legal or regulatory requirements. The acceptability of any claim will depend on its specific context, wording, and use.

On product illustrative claims:

- 1) *[GOTS/GRTS Goods have/This product has] been produced using GOTS/GRTS- approved chemical inputs that have been assessed according to the applicable criteria of the standard.*
- 2) *This product is GOTS/GRTS certified. It was manufactured in facilities certified to the GOTS/GRTS standard, which undergo independent, annual GOTS/GRTS audits by accredited Certification Bodies*
- 3) *GOTS/GRTS Products are manufactured in certified supply chains in accordance with the applicable GOTS/GRTS requirements. Compliance with the defined environmental and social criteria is independently checked and certified by accredited certification bodies as part of the GOTS/GRTS certification.*

Off product illustrative claims:

- 4) *[We are / Organisation Name is] certified to the Global Organic Textile Standard (GOTS) [CB Name], [Certification Number]. GOTS is a standard for the processing of textiles made from certified organic fibres and covers specified environmental and social criteria. Compliance is independently assessed and certified by accredited third-party Certification Bodies.*
- [We are/ Organisation Name is] certified to the Global Responsible Textile Standard (GRTS) [CB Name], [Certification Number]. GRTS is a standard for the processing of textiles made from selected fibres and covers specified environmental and social criteria. Compliance is independently assessed and certified by accredited third-party Certification Bodies.*
- 5) *Our GOTS/GRTS certification requires certified wet-processing facilities to operate environmental management systems and to meet wastewater treatment and testing requirements.*
- 6) *Our GOTS/GRTS certification requires certified facilities to calculate the gap between wages actually paid and living wages (using recognised calculation methods) and to develop a plan for closing this gap.*