



WELCOME to the second reference group
meeting in the project
***Nordic textile reuse and recycling commitment –
Part 2 Implementation!***

AGENDA

- | | |
|---------------|---|
| 10:00-10:20 | Welcome and status of the project |
| 10:20-11:20 | Experiences from the trials |
| 11:20 -12:00 | Proposed changes to the certification process |
| 12:00-12:40 | LUNCH |
| 12:40-13:40 | Proposed changes to the criteria |
| 13:40-14:00 | COFFEE |
| 14:00-14:30 | Requirements for auditors |
| 14:30-15:00 | Communication |
| 15:00 – 15:30 | Questions and next steps |

Overall aim of “Nordic textile reuse and recycling commitment – Part 2 Implementation”:

“To increase reuse and recycling of textiles in order to reduce the environmental impact from textile consumption. This is to be done by implementing the Voluntary commitment including a certification system for collectors, sorters, recyclers and second hand traders of used textile and textile waste.”

PROJECT ACTIVITIES

April 2015 - September 2016

Activity 1: Nordic reference group

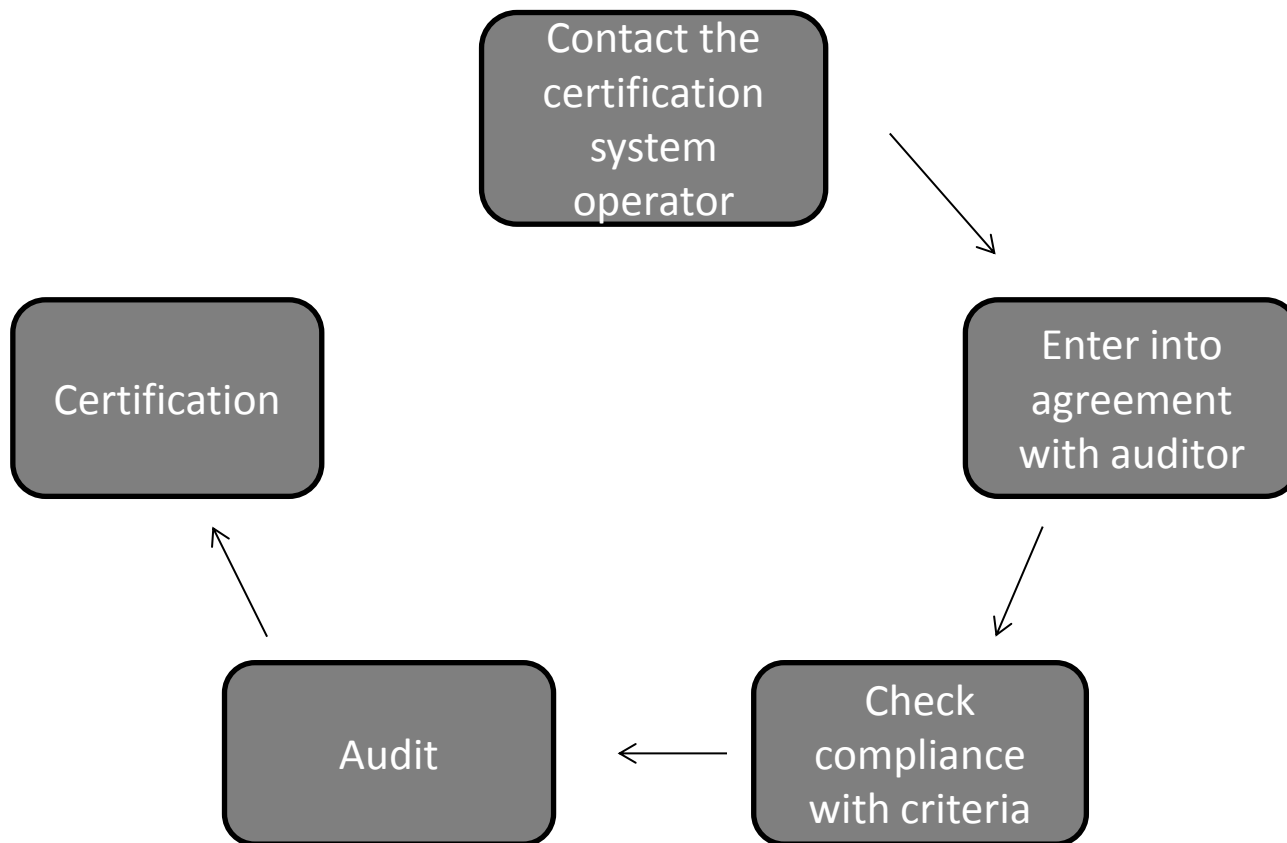
Activity 2: Website and communication material

Activity 3: Certification system operator

Activity 4: Protocol templates

Activity 5: Trial

A COLLECTOR'S WAY TO CERTIFICATION



OVERALL PROGRESS SINCE THE PREVIOUS REFERENCE GROUP MEETING:

- Protocol template (checklist) to be used in the trial was developed by the project group
- Change of name, from “Code of Conduct” to “Standard for transparency and environmental performance”
- Two interim auditors were assigned for auditing of the participating collectors: Bureau Veritas and Miljöfyrtoern
- Fretex, Myrorna and UFF Denmark were audited (H&M Norway will be)
- Project website in three Nordic languages and English

EXPERIENCES FROM THE TRIAL

Ulandshjælp fra Folk til Folk (experiences from DK)

How was the Audit carried out?

Auditor: Bureau Veritas, Jørn Jensen/Michael Fich

Audit date: January 2016

Place: Nearly a full day at UFF headquarters checking documents, reports, letter and other documentation, as well as a visit to UFF warehouse in Havdrup to check equipment, stock and processes.

Experiences from UFF

Difficulties:

- System boundaries:
 - The implicit variety in and the routes to the market for the collected clothes make defining fixed system boundaries very difficult.
 - Who is the "end user"?
 - Could implement step-wise data demands.
 - UFF have a vertically integrated organisation:
 - Other collectors may find addressing systems boundaries more difficult.
- Time:
 - It was a time intensive process!
 - (+) it should go quicker once the process is streamlined and the issues raised in this meeting are address, but...
 - (-) UFF already had, coincidentally, a lot of data at hand from an earlier project. The process would have taken long if *new* primary data from disparate parts of the value-chain was required.

Experiences from UFF

General comments:

- Process is demanding:
 - Not necessarily detrimental but...
 - General flow of questionnaire / template could be optimised to make it easier to understand.
 - Clarify the information demands upfront.
- Timing of this is interesting/challenging.
 - Change in status of textile waste and different conditions for the collection of textiles. Municipalities asserting ownership over waste.

Experiences from Bureau Veritas

General comments:

- The project is a good launch point for the initiative, but some aspects still need to be clarified and refined before the certification system can function in practise (not a surprise!)
- The demands for certification should be clearer and from the start.
 - the certification process (what kind of information will be required)
 - performance (what should that information reveal!)
- It could be an idea not to set the bar too high, but to incorporate an element of improvement over time.
 - This is also a central part of global standards like ISO 9001 and 14001.

FRETEX

(Experiences from Norway)

How was the trial carried out?

Auditor: Miljöfyrtoern, Jan Bjerke

Audit date: January 27th and 28th

Place: Fretex, Ole Deviks vei,
Oslo.



Experiences from Fretex

- Gathering the information took a long time, but will be much easier in the future.
- The data required existed, but was not all easy to find for the first time.
- The document list Rolf Eriksen (Miljøfyrtårn) developed was very useful.
- It was a useful exercise, certification requirements mean that some routines need to be improved / sharpened, but this is a good thing.
- It is important that the template has clear, simple questions. This was not the case for all of the questions in the trial. The auditors recommendations and project team's proposals for simplification and clarity are welcomed (both criteria and template).

Views from the auditor

“På bakgrunn av gjennomgang av dokumenter, samtaler og stikkprøver mener jeg at Fretex Øst-Norge AS oppfyller kriteriene og intensjonen i «Standard for transparency and environmental performance in the management of used textiles», som er lagt til grunn for sertifiseringen.”

During the test, some needs for clarification arose:

- How «deep» should the auditor go into the documentation? Should the certification be performed in-line with the principles for ISO, or a more low-level certification (mer «lavterskel-sertifisering»)?
- Some criteria are difficult to verify, e.g. the criteria in Section 9.
- It is hard to establish routines to check hazardous substance content.
- Some terms need clear definitions:
 - Is «energy recovery» included in «recycling» or is it «waste»?
 - What are the boundaries (avgrensningene) for «In store collection»?

MYRORNA (experiences from Sweden)

How was the audit (and trial) carried out?

Auditor: Miljöfyrtoern, Rolf Eriksen

Audit date: January 19th (pre-meeting with Fretex International)

Place: Myrorna head office in Årsta. Visit to sorting facility in Tungelsta, sorting facility in Sättra, and to recycling center.

Experiences from Myrorna

Difficulties:

- To follow the structure in the protocol template. A more process-orientated structure would facilitate understanding the overall picture and requirements.
- The structure of the protocol template could be more based on the flow chart with activities, documentation, routines and follow-up more clearly linked to the flow chart.

Experiences from Myrorna

- Challenge to know the level of details required in the documentation.
- What kind of documentation is required?
- Time-consuming to gather data and documentation as it is not centrally organised at Myrorna.

Benefits:

- Useful tool to "get to know" your organisation, and identify missing pieces.

Views from the auditor

- It is difficult to understand the aim of the criteria based on the protocol template. Miljöfyrtorn interprets the criteria as if quality management of the processes in the value chain is key.
- The requirements on documentation must be more precisely explained (routines, follow-up etc.)
- Definitions used in the criteria need explanations.
- Myrorna has routines for the management of the used textiles, but some of them are not communicated in print, only verbally.
- The routines are sometimes implemented differently at different locations.
- The remaining work is mainly to implement informal routines, and make sure the routines are interpreted the same way throughout the value chain.

PROPOSED CHANGES TO THE CERTIFICATION PROCESS

1. To require or not require full compliance of criteria in order to get certified

Different ways to look at it:

Alternative nr 1: To require full compliance of all criteria before certification is issued

Alternative nr 2: To require compliance of certain "key" criteria to get the certification, and accept actions plans (with re-audit)

Alternative 1:

Audit



Full compliance of criteria

Auditor
confirms
compliance



Certification is
issued by CSO

Alternative 2:

Audit

Compliance of certain "key" criteria, but deviations occur

Collector presents
actions plans on
deviations

Within 90 days from the audit

Auditor approves
the action plans

Auditor report is sent to CSO

Certification is
issued by CSO

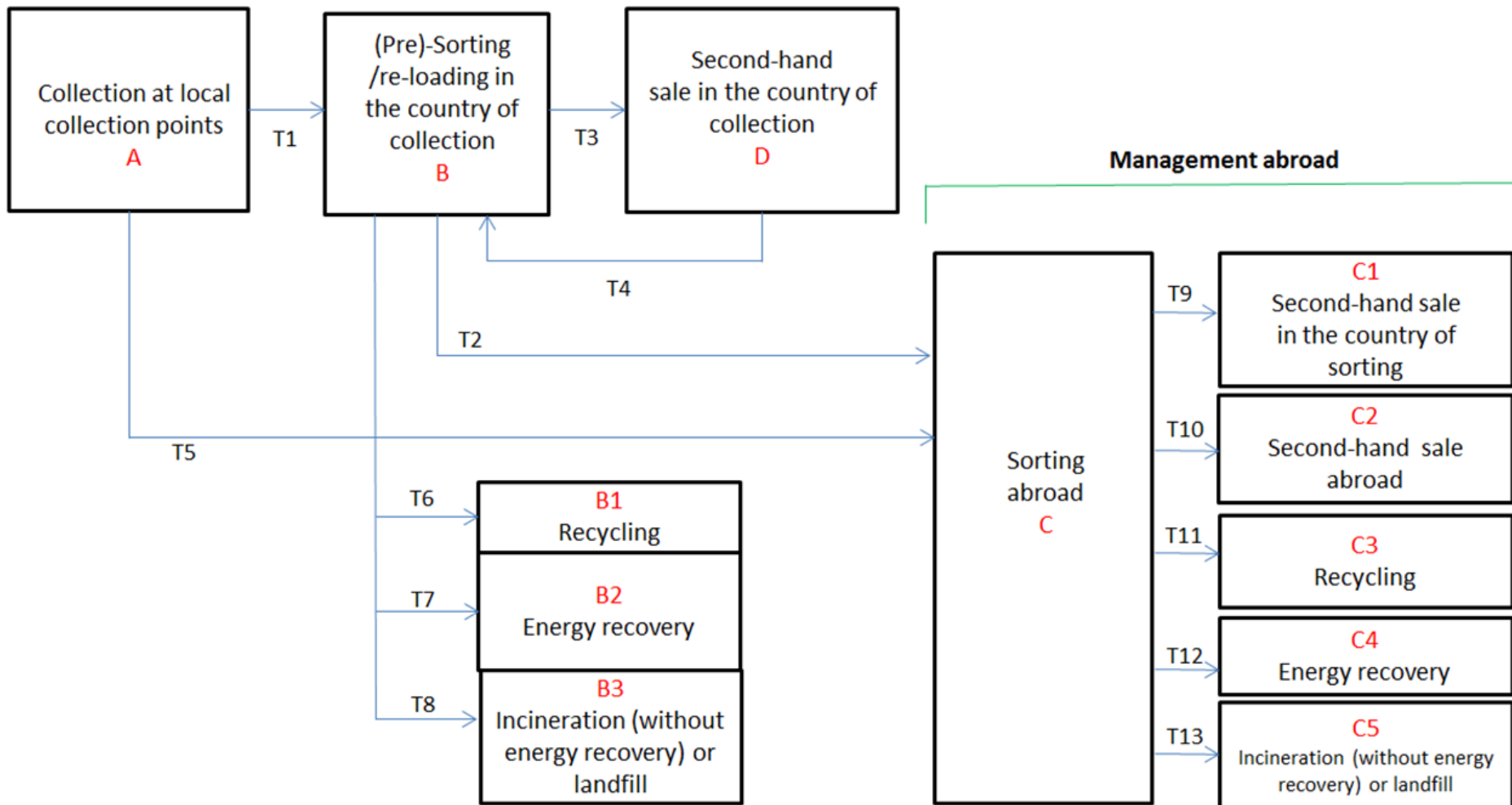
Re-audit controls
that planned
actions are taken
to comply with
all criteria

Within a year from the first audit

2. To which stage in the value chain should the collector be able to document?

For example: Criterion 2.2:
Traceability of textiles shall be possible up to the point of **end users** being either private customers, recycled products or final disposal.”

Proposal: To add a definition of end user. “The business operations plus the next step in the value chain”. “The next step in the value chain” should include the outputs from C in the flow chart. In other words, the collector is not required to document the outputs of C1-C5.



3. Use of verified scales

Proposal:

The use of calibrated/verified scales according to national/international standards should be a criterion for certification.

Weights that form the basis for the calculation of the reuse and recycling rate should be verified.

The minimum requirement is to weight the collected textiles at reloading stations.

This should be inserted as a separate criterion under section “Information, transparency and reporting”.

4. Calculation of reuse and recycling rates

Proposal: The reuse and recycling rate should be calculated on the basis of both:

textiles sent to reuse divided by
the amount of textiles collected

and

textiles sent to reuse divided by
the amount of original textiles collected

To follow up on the criteria (C4.2-C4.5) the first calculation model should be used.

5. What should happen between the certification and re-certification?

Proposal: The certified collectors should annually provide the CSO with statistics in the form of an annual report.

Should the certificate be valid for three years?

Any other suggestions?

Certification committee

Committee role and purpose

The certification system shall have a committee that assists the certification system operator in decisions regarding development of the system, approval of verifiers to the system, setting fees and general certification issues.

The committee is advisory to the system operator.

Committee members

- 8-10 members, of which 2 represent Nordic governments (e.g. EPA)
- Remaining members are chosen by the CSO and government representatives (1 vote each, 3 votes in total)
- Anyone can propose members, please send proposals to CSO!
- Members can be certified actors, aspiring actors or anyone with specific knowledge useful for the CSO.

Committee members

- Certification committee members shall be chosen based on the **needs of the certification system.**
- A **diverse** group in terms of **geography** and **organizations** should be sought for when choosing new members.
- The choice of and **reasoning** for new members shall be made **publicly available.**
- Members are chosen for a **two year** period. Can be both excluded and chosen again.

Meetings, responsibilities and reimbursement

- 2 meetings per 12 months, live or video
- Meetings announced minimum 1 month in advance
- Notes should as a general rule be publicly available
- Possible for member to have reservations included in notes

- Quickly respond to requests from CSO on decisions between meetings. CSO to use this option with care.

- No reimbursement for efforts within the committee scope.
- Certain tasks, such as investigations, may be reimbursed

Meetings, responsibilities and reimbursement

All members should work for the benefit of the certification system as a whole and help secure a transparent and trustworthy system.

PROPOSED CHANGES TO THE CRITERIA

Current criterion:

C2.1: All statements in the code of conduct stated as “shall” shall be verifiable during certification or recertification.

Proposed change:

This criterion should be removed, and instead be formulated as a statement in the beginning of the protocol template.

Current criterion:

C.2.2: Traceability of textiles shall be possible until end users being either private customers or recycled products.

Proposed change:

The definition of end-users should be included in the criterion.

Current criterion:

C2.3: The collector are responsible for gathering all downstream information. If cooperation is made with a downstream signatory, the combined activities shall fulfil the criteria.

Proposed change:

C2.3: The collector is responsible for gathering the required information. This includes relevant information from third party organisations required to fulfil the criteria.

Current criterion:

C2.4: Documentation shall include receipts of all transfer of textiles to and from signatories and sorters, resellers or recyclers. Sorters, resellers and recyclers shall be able to verify the fate of received textiles (overall or specific to signatory) either directly with receipts or via third party certification.

Proposed change:

C2.4: Documentation shall include receipts of all transfer of textiles to and from **collectors** and sorters, resellers or recyclers. Sorters, resellers and recyclers shall be able to verify the fate of received textiles (overall or specific to **collector**) either directly with receipts or via third party certification.

Current criterion:

C2.5: All collected textiles shall be documented with weight or volume and source of origin.

Proposed change:

C2.5: All collected textiles shall be documented with weight and source of origin.

The source of origin should be specified by a foot note. The minimum requirement is to weigh the collected textiles at reloading stations. This needs to be clarified in the protocol template.

Current criterion:

C3.3: Collectors shall accept all other textiles that are clean and non hazardous. This includes torn, worn-out and incomplete textiles (e.g. single socks). This should be made clear to the consumer.

Proposed change:

C3.3: Remove non-hazardous from the criterion. Take away “other”.

Current criterion:

In-store collection:

C3.4: There shall be clear and correct information about the collection including name and contact information to the collector, reference to the system and the main purpose (see section 9 for details on social performance) of the textile collection.

Proposed change:

Remove “reference to the system” from the criterion as it is not possible for the collector to fulfil the requirement in the first audit (as they are not certified).

Current criterion:

Kerbside collection:

C3.5: The collector shall specify which day collection will take place.

Proposed change:

Remove the criterion.

Current criterion:

Container collection:

C3.9: Textile containers shall only be placed after having achieved a permit for doing so by the competent authority and/or land owner.

Proposed change:

To replace permit with (written) permission.

Current criterion:

C4.1: Sorters shall not accept textiles that originate from illegal collection or textiles with uncertain origin.

Proposed change:

This criterion should not be removed, but not be part of the criteria targeting collectors (only to sorters).

Current criterion:

Criteria 4.2-4.5: Sorters shall report sorting performance in percentage by weight or volume of received textiles whose next stage is in:

- Reuse **(C4.2)**
- Recycling **(C4.3)**
- incineration with energy recovery **(C4.4)**
- landfill or incineration without energy recovery **(C4.5)**

Proposed change:

Sorters shall report the annual amount and the share of the sorted textiles that are sent to:

- Reuse **(C4.2)**
- Recycling **(C4.3)**
- Incineration with energy recovery **(C4.4)**
- Landfill or incineration without energy recovery **(C4.5)**

Sorting results according to C4.2-4.5 can be given to a collector either as specific to their textiles (if available) or as the average fractions of the sorting not specified for any specific supplier .

Current criterion:

C4.6: Sorting performance as described above shall be given for each specific supplier or as the residual of received material not included in sorting performance for a specific supplier.

Proposed change:

If the information is included in C4.2-C4.5 there is no need for this criterion, is more of an instruction.
Remove the criterion.

Current criterion:

C5.1: Recyclers shall report the level of recycling in percentage weight or volume of received textiles and the distribution between recycled products.

Proposed change:

If criterion 4.2 to 4.5 is changed, C5.1 has to change accordingly. We also propose that the level of recycling should be reported in weight percentage only.

Current criterion:

C8.1: Collected textiles shall be treated according to the Waste hierarchy stated in the waste framework directive (2008/98/EC).

Proposed change:

Remove this criterion and add the text as an introductory sentence under section “Environmental performance”.

Current criterion:

C8.2: At least 50% of collected textiles shall be reused (annually) either by charity reuse, domestic sales or by export to an organization guaranteeing the level of reuse.

Proposed change:

The present requirement is considered too low when talking to the collectors. A proposal from the project group is 75 percent, but should be discussed.

Proposal of new criterion:

C8.X: The collector shall present actions plans for increasing the amounts of textiles that are dealt with higher up in the waste hierarchy.

Social benefit

Criteria background

Chosen based on criteria for

- social enterprise defined by EMES international research network for social enterprise and social entrepreneurship
- an NGO developed by Wijkström and Lundström (2002)
- a work integration social enterprise by the Swedish government (N2010/1894/ENT)

Included to enable the general public to know if there are additional social benefits beyond environmental.

A way to meet and acknowledge the historic reasons for donating textiles.

Criteria background

Included to enable the general public to know if there are additional social benefits beyond environmental.

A way to meet and acknowledge the historic reasons for donating textiles.

Aimed to include a variety of socially beneficial actors.

The criteria do not define an organization with a social benefit independent from each other, which is why at least six out of nine criteria are required.

Uncertainties...

The definitions of socially beneficial organizations are not always clear cut.

1. If there are uncertainties to whether an organization meets the criteria for social benefit the auditor may present the uncertainty to the system operator.
2. The system operator then consults the certification committee which will evaluate and propose a recommendation.
3. The system operator makes the final decision.

Criteria 1-2

“Reinvest profits in own or similar enterprises”

“Be non-profit”

One of the two must be fulfilled.

This means that profits cannot be used for purposes not described in any of the remaining 8 criteria.

Criteria 3-4

“Have as main purpose to integrate people with significant difficulties getting employment and/or staying employed”

“Create partnership for coworkers through ownership, contracts or in other documented ways (e.g. membership)”

These criteria represent ways of empowering and strengthening workers. A substantial part of employees should be included.

Criteria 5

“Be structurally independent from the public sector”

The actor can still receive funds from the public sector.

Criteria 6

“Be certified as having charity status”

Could be...

In Sweden: approval from Svensk Insamlingskontroll

In Norway: approval from Innsamlingskontrollen

In Denmark: ?

In Finland: ?

In Iceland: ?

Criteria 7

“Mainly be operated by volunteers”

A majority of staff should be volunteers.

Criteria 8

“Have clear and transparent economic accounting”

Necessary to ensure e.g. criterias 1, 2 and 6.

Criteria 9

“Have as main purpose to protect human equity and equal rights”

Criteria 10

“Have as main purpose to improve living conditions for humans living under particularly difficult conditions”

REQUIREMENTS ON AUDITORS

Possible model 1:

The auditor:

Must be part of a certification body with accreditation of ISO 9001 *Quality Management Systems*, ISO 14001 *Environmental management systems* and ISO 17021 *Conformity assessment -- Requirements for bodies providing audit and certification of management systems*.

Have knowledge and understanding of the criteria in the “Standard for transparency and environmental performance in the management of used textiles”.

Must be impartial and objective.

Pros and cons of model 1:

- + Makes it easier for the CSO to approve or disapprove auditors.
- + Relies on international well-known standards.
- + Makes the comparison between auditors easier.
- Smaller range of options for collectors.
- Could result in higher certification costs for the collectors.
- May lead to exclusion of nationally well-known quality/environmental management systems.

Possible model 2:

The auditor:

Must be part of a certification body with accreditation of ISO 9001 *Quality Management Systems*, ISO 14001 *Environmental management systems* and ISO 17021 *Conformity assessment -- Requirements for bodies providing audit and certification of management systems*.

Exceptions can be made if the certification body is nationally recognised and approved by the CSO in consultation with the Certification Committee.

Have knowledge and understanding of the criteria in the “Standard for transparency and environmental performance in the management of used textiles”.

Must be impartial and objective.

Pros and cons of model 2:

- + Makes it more demanding for the CSO and Certification Committee to approve auditors.
- + Larger range of options for collectors.
- More difficult to communicate as the nationally recognised systems might be unheard of in the rest of the Nordic region.
- It could jeopardise the trustworthiness of the certification system.

COMMUNICATION

- Municipalities' roles
- Collectors' communication after certification is issued

Municipalities' roles

Collectors' communication after certification is issued