Part 2 Implementation

WELCOME TO THE THIRD AND FINAL REFERENCE GROUP MEETING!
WHY A CERTIFICATION SYSTEM?

Increase *separate collection* of textiles and textile waste
Increase *reuse and recycling* of textiles
Lower the *environmental impact* of textile consumption
Increase *transparency and faith* in textile collection
Eliminate illegal collection
Strengthen Nordic *competitiveness*
AGENDA

10:00-10:30  Welcome and status of the project
10:30-11:30  Certification process
11:30 -12:00 Legal assessment of the criteria
12:00-13:00  LUNCH
13:00-13:45  Certification system operation
13:45-14:30  Consultation with the reference group on specific issues
14:30-15:00  Coffee and sum-up of the day incl. evaluation of the project
THIS MEETING’S AIM:

- Wrap-up the project
- Evaluate the project
- Discuss some “missing pieces”
- Discuss continuation
PRESENTATION ROUND
WHAT HAVE WE DONE IN THE PROJECT?

• Revised the certification process and criteria based on trials with Myrorna, Fretex, UFF Denmark and H&M Norway

• Created checklists to be used by collectors to prepare for audit incl. documentation requirements

• Website set-up

• Proposed fees to be charged the collectors and users of the commitment logo

• Developed auditor requirements

• Proposed a certification process

• Facilitated the system delivery to a CSO
CERTIFICATION PROCESS
Two types of certificates (voluntary social benefit):
Nordic textile reuse and recycling commitment: Certification system for textile collectors

**ORGANISATIONS**

- **Certification System Operator (CSO)**
  - Maintains the certification system and issues certification

- **Certification Committee**
  - Supports the CSO with updating the criteria and checklist, and steering the Certification system

- **Auditor**
  - Authorised by the Certification System Operator to audit and verify the information provided by the collector prior to certification

- **Collector**
  - Collects textiles in the Nordic countries for reuse or recycling

**CRITERIA**

- **Criteria:**
  - Criteria divided into 7 groups:
    - Information, transparency and reporting
    - Collecting
    - Sorting
    - Recycling
    - Reuse (including sales)
    - Environmental performance
    - Social benefit

  - There are two different sets of criteria:
    - one for reuse only
    - one for reuse and recycling

**CHECKLISTS**

- **Checklist for collectors for: Reuse**
  - A checklist of documentation required to verify that the collection has met the criteria.

- **Checklist for collectors for: Reuse & recycling**
  - A checklist of documentation required to verify that the collection has met the criteria.
The following stakeholders are suggested to be represented in the committee:

- Collectors (2-3, rotating between certified system members)
- Textile producers (1-2, rotating between interested parties)
- Textile recyclers (1-2, rotating)
- National authorities (EPAs) (1, rotating)
- NAG representatives (1, rotating between countries)
- Researchers (1, rotating)

Meeting procedures:

- The chair of the committee is chosen by voting on the first yearly meeting.
- Meetings at least twice per year
- One meeting every third year should be dedicated to updating of the system documents
Auditor requirements

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

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

3. Must have knowledge and understanding of the criteria of the certification system

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

The auditor has the accreditations or not.
2. Exceptions can be made if the certification body is nationally recognised and approved by the CSO in consultation with the Certification Committee.

Decision on a case-by-case basis by the CSO and the certification committee.
3. Must have knowledge and understanding of the criteria of the certification system.

All “new” auditors need to make an appointment with the CSO to get information about the certification system.
4. Must be impartial and objective.

The auditor cannot have:
Previous employment for the collector
Direct connection (e.g. ownership etc.)
Acted as consultant for the collector
A private or a working relationship with the collector or with any of the employees

Signed statement from the auditor suggested.
Criteria for collectors seeking certification for collection of textiles aimed for reuse only

23 criteria
+ 1 for social benefit

Criteria for collectors seeking certification for collection of textiles aimed for reuse and textile waste for recycling

26 criteria
+ 1 for social benefit

Differences:

- Collectors shall accept all textiles
- Permission to collect waste as stipulated under national waste legislation
- Written approval/agreement from the municipalities where the collection takes place
The checklists include the criteria, and specific documentation requirements following each criterion.
Certification process

1. Contact the CSO
2. Check compliance with criteria
   - Checklists including criteria and documentation requirements to comply with criteria
3. Enter into agreement with auditor
   - Agreement between collector and CSO
   - Certification valid for three years
4. Audit
   - Audit report
   - Full compliance of criteria needed
5. Certification
Use of logos

• Suggested to be printed by the CSO and sent out to the collector.

• Include collector’s individual registration number and validity of the certificate.

• Collectors are only permitted to use the system logos while the certificate is valid.

• Should a former holder of a certificate continue to make use of the logos, without being re-certified, the CSO is suggested to reserve the right to claim financial compensation or at least withdraw the certificate.
LEGAL ASSESSMENT OF CRITERIA
Nordic Green Growth by sustainable waste management

Legal assessment of the Nordic textile reuse and recycling commitment

Yvonne Augustsson
Textile coordinator
Nordic Waste Group
Project team

Project leader:

Pernille Aagaard Truelsen, Advokatfirmaet Energi & Miljø

Project members:

• Norway: Catherine Banet (Oslo Universitetet)
• Finland: Kai Kokko (Helsinki Universitetet)
• Sweden: Carl Dalhammer (Lunds Universitetet)
Timeplan

- Start up meeting: 18th of October
- Contract
- Template finalization 11th of November
- End of project: 2nd of December
Aim of the legal assessment

• To assess and verify that the two versions of criteria’s in the Nordic Textile Commitment for reuse and recycling are in compliance with national legislation in Norway, Denmark, Finland and Sweden

• To visualize for actors who want to join this voluntary certification system what and how they have to act to comply with the criteria’s within the system according to the national legislations in place in each country.
Examples of headlines

• Legal definition of used textiles
• Disposing of used textiles
• The collection of textiles
• The collector
• Obligations when the textiles are collected
• Traceability
• Criteria document 1 and 2
The collector:

How is the collector regulated when the used textiles are for re-use (second hand sale)?

How is the collector regulated when the used textiles are regarded as waste?

Is there a distinction between commercial textiles and the textiles deriving from households?

Would there be any registration or permitting requirements?

Or educational requirements targeting the waste collector?

Would there be any issues in relation to competition law, including public procurement requirements?
CERTIFICATION SYSTEM OPERATION
The CSO role

Responsibilities of the operator include:

• Registration of new organisations that wish to certify their business.

• Signing agreements with these organisations, including provisions regarding the use of logos and on sanctions in case of unauthorized use.

• Administration of system fees.

• Administration of registration documents, criteria document and checklist.

• Selection of third party auditors.

• Issuing certificates.

• System website management including keeping the website up-to-date with correct information about the certification system and information about certified actors.

• Labels and communication materials.
The CSO role cont.

• Managing/administration of the certification committee: duties include arranging meetings, producing background documents and meeting minutes.

• Gathering and compiling statistics on collected amounts of original textiles, reused amounts of textiles and recycled amounts of textiles from the certified collectors on an annual basis.

• Presenting the statistics on the website.

• Writing a newsletter on a regular basis and keep a list of subscribers to the newsletter.

• Communication about the certification system to the general public and on a business-to-business level.
Finding a CSO

• Limited interest from the start – lack of a strong business case
• Interested actors have turned up
• NWG will procure the CSO role.
The project team suggests that actors applying for the CSO role should be able to show evidence that they have experience and competence in several relevant areas:

- Experience with third party certification systems or similar.
- Experience in communication to the general public as well as communication on a business-to-business basis.
- Experience in hosting websites.
- Experience in administration, for example fees and costs covered by members.
- Experience in working on the Nordic level.
Characteristics of a CSO

The bidders should have to explain:

• The organisations’ interest in the CSO role and the driving forces behind this interest.

• How the CSO role would fit into the organisation’s ordinary operations.

• The organisation’s experience in working with textiles and textile waste.
DISCUSSION OF SPECIFIC ISSUES
What should the reuse rate be for collection of textiles for reuse only?

• At the 2nd reference group meeting it was decided that the reuse and recycling rates will be calculated based on collected *textiles* (not on original textiles)
• Reuse rate for collection of textiles for reuse and textile waste for recycling: *50% reuse and 90% reuse and recycling*

**Project team’s suggestion:**

*To require 80 % reuse*
System fees

- Up to the CSO to decide
- Fees should cover costs for the CSO

We propose the following system fees:

1. Registration fees paid when registering to the CSO
2. Annual fees paid at the beginning of each calendar year
3. Fees for using the supporter logo
Proposed annual fees:

<table>
<thead>
<tr>
<th>Collected amounts of original textiles</th>
<th>Corresponding size</th>
<th>Possible annual fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;=100 tonnes</td>
<td>Small</td>
<td>€100 + VAT</td>
</tr>
<tr>
<td>100&gt;=1000 tonnes</td>
<td>Medium</td>
<td>€500 + VAT</td>
</tr>
<tr>
<td>1000&gt;=10000 tonnes</td>
<td>Large</td>
<td>€1000 + VAT</td>
</tr>
<tr>
<td>&gt;10000 tonnes</td>
<td>X-Large</td>
<td>€2500 + VAT</td>
</tr>
</tbody>
</table>

Proposed registration fees: €400-600 + VAT
Supporter logo

The supporter logo may be used by:

• Municipalities having contracted/given permission to a certified collectors.
• Second-hand shops having exclusive contracts with certified collectors.
• The use of the logo is accompanied by an annual fee.

Fees for using the supporter logo (municipalities):

<table>
<thead>
<tr>
<th>Number of inhabitants</th>
<th>Corresponding size</th>
<th>Possible annual fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;10 000</td>
<td>Small</td>
<td>No. of inhabitants</td>
</tr>
<tr>
<td>10 000-250 000</td>
<td>Medium</td>
<td>€500 + VAT</td>
</tr>
<tr>
<td>&gt;250 000</td>
<td>Large</td>
<td>€1000 + VAT</td>
</tr>
</tbody>
</table>
Site visits

We need to specify the need for site visits, it cannot be up to the auditor.

• Site visits to abroad sorting facilities needed?

Criteria related to sorting:

Criterion 1.1: Traceability of textiles shall be possible from collection to the input of C1-C5 (see flow chart), i.e. the collector shall be able to document the quantities of sorted textiles sent to second-hand sale in the sorting country, second-hand sale in a third country, recycling, energy recovery, and incineration without energy recovery or to landfill.

Example of documentation requirement: “Documented description of the routines for weighing the collected textiles.

The description/routine shall include information about where in the value chain the textiles are weighed. The minimum requirement is to weigh the collected textiles at reloading stations and in shops. The collector shall be able to present documented weights.”
Criteria 3.2-3.5: Sorters shall report the annual amount and the share of the sorted textiles that are sent to:

- Reuse
- Recycling
- Incineration with energy recovery
- Incineration without energy recovery or landfill

Sorting results according to C3.2-3.5 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.

This can be checked without visiting the sorting facility.

Criterion 5.1: Collected used textiles shall only be sold to companies with the requested competence regarding handling of these material flows.

This can be checked without visiting the sorting facility.
Site visits at collection points to check:

**Criterion 2.1:** It should be made clear to the person delivering/donating used textiles to collection actors where the textiles are going, what the purpose of the collection is, which organisation is performing the collection; and how to find more information about the certification system.

**Criterion 2.3:** Collectors shall accept all textiles, i.e both textiles aimed for reuse and textile waste. This includes torn, worn-out and incomplete textiles (e.g. single socks). This should be made clear to the consumer.

**Criterion 2.4:** Information on which products are accepted shall be clearly stated to the consumer.

**Criterion 2.10:** The collector shall ensure that containers are emptied frequently and that they are clearly marked with contact details in the event of problems.
How many collection points shall be visited?

<table>
<thead>
<tr>
<th>Number of collection points</th>
<th>Number of site visits</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-9</td>
<td>2</td>
</tr>
<tr>
<td>10-99</td>
<td>5</td>
</tr>
<tr>
<td>100-999</td>
<td>15</td>
</tr>
<tr>
<td>1000-5000</td>
<td>25</td>
</tr>
</tbody>
</table>
Sum-up and evaluation:

1. As a reference group member, we have listened and included your input in development of the system. Do you think that views that you have expressed have been considered by the project team?

2. Have you received regular information from the project?

3. Has participation in the reference group meetings increased your understanding of the collection of original textiles and their treatment?

4. Has participation in the Nordic Commitment project(s) contributed to changes in strategy, or other impacts on your organisation? Please write down some impacts (e.g. changes in targets from collection of reuse only to all textiles, knowledge and action towards environmental authorities in your country/ countries of operation etc.)

5. What was your reason for joining the reference group?

6. Have your expectations been fulfilled?