

Item 08 – GRI Sector Standard Project for Textiles and Apparel – Proposed public comment questionnaire for the exposure draft

For GSSB information

Date	05 June 2025
Meeting	19 June 2025
Description	This document contains a draft public comment questionnaire for the exposure draft of the Textiles and Apparel Sector Standard to be submitted to the GSSB for information at the June 2025 meeting.
	The public comment period is proposed to commence in early July 2025 and run until the end of September. An open questionnaire will be set up online to collect public feedback.
	This document sets out the proposed questions to be included in the feedback questionnaire.

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Questions for the GRI Sector

² Standard Project for Textiles and

3 Apparel - exposure draft

4 Scope of the exposure draft

- 5 Section 1, 'Sector this Standard applies to' (page 8), outlines the scope of the Standard.
- 6 The Sector Standard for Textiles and Apparel will apply to organizations undertaking any of the 7 following:
- Textile manufacturing, including the transformation of fibers into yarn and fabrics for domestic
 and commercial purposes
- 10 Apparel manufacturing
- 11 Footwear manufacturing
- 12 Jewelry manufacturing, including the cutting and polishing of diamonds and gemstones
- 13 Apparel retail
- 14 Footwear retail
- 15 Jewelry retail
- 16 Textile retail

17 This Standard can be used by any organization in the Textiles and Apparel sector, regardless of size, 18 type, geographic location, or reporting experience.

19 Question 1

For this Standard, is the sector's scope clear and practical? Are there any other activities or
 types of organizations that should fall within the scope of this Standard? Please suggest what
 could be improved.

23 Supply Chain Disclosure (page 20)

24 Understanding where impacts occur within the textiles and apparel sector is complex due to the 25 fragmented nature of the value chain. It is often unknown to organizations downstream and to 26 stakeholders which organization is causing or contributing to negative impacts when they occur. For 27 example, impacts such as forced overtime due to the bringing forward of an order delivery date with 28 short notice or requiring products to be produced at a certain cost, resulting in the use of cheaper, more 29 hazardous, and possibly illegal chemicals, could not be known by the downstream organization due to a 30 lack of supply chain transparency. By gaining a clearer understanding of supply chains, organizations can help mitigate or manage their impacts, conduct due diligence, and build trust. Recognizing the 31 32 importance of supply chain transparency, additional sector recommendation xx.0.1 has been included in the textiles and apparel exposure draft. 33

34 **Question 2** 35 • Do

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• Do you agree with the inclusion of supply chain disclosure xx.0.1 in the Textiles and Apparel Sector Standard? If not, please explain and provide suggestions for improvement.



37 Likely material topics

Section 2, 'Likely material topics' (pages 22-67), lists 18 likely material topics for the textiles and apparel
 sector. 'Likely material topics' encompass the sector's most significant impacts and are therefore likely
 to be material for most organizations to report publicly.

41 'Impact' refers to the effect the sector or organizations operating in the sector have, or could have, on

the economy, environment, and people. Impacts can be positive or negative. Organizations can be
 involved with negative impacts through their activities or as a result of their business relationships (see

- 44 <u>GRI 1: Foundation 2021</u> for more information on key concepts).
- 45 When determining its material topics, a reporting organization in the sector needs to review each topic 46 described in the Standard and decide whether it is material for the organization to report based on its
- 46 described in the Standard and decide whether it is mate
 47 specific circumstances.
 - 48 Not all topics listed in the Standard may be material for all organizations in the textiles and apparel
 - 49 sector. For organizations reporting in accordance with the GRI Standards, if any of the topics included
 - 50 in the Standard are deemed not material, the organization lists them in the GRI Content Index and
 - 51 provides a short explanation of why they are not material. Other topics not listed in the Standard may be
 - 52 relevant to an organization based on its impacts or context and should also be reported on.

53 Question 3

Do the topics included in the exposure draft represent the textiles and apparel sector's most significant impacts and are therefore likely to be material for most organizations in the sector to report? If not, please explain which topics should not be listed as likely material for the sector or which topics or significant impacts are missing.

58 **Reporting sub-sections**

59 For reporters

Section 2, 'Likely material topics' (pages 22-67), lists relevant disclosures for the textiles and apparel
 sector to report on each topic. These disclosures are partly derived from existing GRI Topic Standards.

- However, where disclosures from Topic Standards do not exist or do not provide sufficient information
- about a textiles and apparel organization's impacts in relation to a topic, additional sector
- 64 recommendations and additional sector disclosures are listed. When referring to the disclosures below,
- this includes GRI Topic Standards as well as additional sector recommendations and disclosures.
- 66 If any of the listed disclosures are irrelevant to the organization's impacts, the organization is not 67 required to report them.
- 68 Question 4.a

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• Are the disclosures listed in this exposure draft relevant for most textiles and apparel organizations to report? If not, which disclosure(s) are not relevant, and why?

71 Question 4.b

Can the disclosures be reported by textiles and apparel organizations? If not, specify which
ones and why not, considering data availability, capacity, digital tools, regulations, or
confidentiality.

75 Question 4.c

Is there any information your organization is currently reporting or planning to report on (with
 regard to its significant impacts on the economy, environment, and people) that is not reflected
 in this Standard? Please elaborate.

79 Supply Chain Disclosures

- 80 Understanding where impacts occur within the textiles and apparel sector is often unknown to
- 81 organizations downstream. Regardless of where the reporting organization is in the value chain, there
- are supply chain specific additional recommendations and sector disclosures. These disclosures are in
- the following likely material topics: water and effluents (pages 28-29); child labor (page 41); forced labor
- 84 and modern slavery (page 43); non-discrimination, equal opportunity, and gender (pages 47-49;



procurement practices (page 58); anti-corruption (page 60); conflict-affected and high-risk areas (page
64); and supply chain traceability (page 66).

87 Question 5

Is it clear whether the disclosures refer to organizations' own operations or impacts on their supply chains?

90 For information users

91 Section 2, 'Likely material topics' (pages 22-67), lists relevant disclosures for the textiles and apparel 92 sector to report on each topic. These disclosures are partly derived from existing GRI Topic Standards. 93 However, where disclosures from Topic Standards do not exist or do not provide sufficient information 94 about a textiles and apparel organization's impacts in relation to a topic, additional sector 95 recommendations and additional sector disclosures are listed. The additional sector reporting enables 96 organizations to provide sufficient and relevant information about its impacts in relation to each material 97 topic so stakeholders can make informed assessments and decisions about the organization.

98 Question 6

Are there impacts currently not (sufficiently) covered by the disclosures in this exposure draft that you would expect to see reported by textiles and apparel organizations? If so, please explain what should be included and why.

Stakeholders' access to data on supply chains and where impacts occur within the textiles and apparel 102 sector is important. The ability to link downstream organizations with upstream impacts for external 103 104 stakeholders is supported by the availability of supply chain information. There are supply chain-specific 105 additional recommendations and sector disclosures that are applicable regardless of the reporting organization's position within the supply chain. These disclosures are in the following likely material 106 107 topics: water and effluents (pages 28-29); child labor (page 41); forced labor and modern slavery (page 108 43); non-discrimination, equal opportunity, and gender (pages 47-49); procurement practices (page 58); anti-corruption (page 60); conflict-affected and high-risk areas (page 64); and supply chain traceability 109 110 (page 66).

111 Question 7.a

Is it clear what information textiles and apparel organizations are expected to disclose about their supply chain?

114 Question 7.b

Does the information asked for (including topic disclosures and additional reporting) provide
 enough information to understand the impacts that the reporting organization is linked to via is
 supply chain?

118 **Topic-specific questions**

119 Climate change (page 22)

This topic covers how organizations contribute to climate change-related impacts.,. The significant use of energy from non-renewable sources, coupled with the sector's lack of investment in energy-efficient technologies, is hindering the sector's ability to meet GHG reduction targets. Reporting on this topic covers the transition and adaptation plans of textiles and apparel organizations, as well as their Scope 1, 2, and 3 reporting, including energy consumption, intensity, and reduction efforts.

124 1, 2, and 5 reporting, including energy co

125 **Question 8** 126 • Are

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• Are the disclosures and additional sector recommendations listed likely to generate critical information on textile and apparel organizations' approach to climate change and how they manage related impacts? Is there anything missing? Please explain what could be revised and how it could be improved.



130 Water and effluents (page 27)

131 This topic covers how organizations contribute to impacts related to water stress and pollution through

high water consumption across their value chain and the discharge of hazardous effluents into the 132

environment. The geographic concentration of textile processing in water-stressed regions exacerbates 133

134 these impacts, affecting ecosystems, local communities, and water quality. Reporting on this topic

135 covers textiles and apparel organizations' management of water-related impacts, withdrawal and discharge of several water types (both in their own operations and at suppliers' facilities), and water 136

137 consumption.

138 **Question 9**

139 Are the additional sector recommendations and disclosures listed likely to generate critical information on textile and apparel organizations' approach to water and effluents, and how they 140 141 manage related impacts? Is there anything missing? Please explain what could be revised and 142 how it could be improved.

Hazardous chemicals (page 30) 143

144 The use of hazardous chemicals can have far-reaching impacts on the environment, workers, local communities, and end consumers if improperly used, handled, managed, or accidentally spilled. Textile 145 and apparel organizations use a vast array of chemicals, from manufacturing through to product 146 147 treatment, with the list numbering in the thousands. Reporting on this topic covers how organizations 148 plan for emergencies and spills, how they handle, store, and manage chemicals, their participation in 149 recognized chemical-related initiatives, the pollutants emitted into the air, the negative impacts on local communities, and the health and safety of products to consumers. 150

151 Question 10.a

152 Is the content of this topic clear? Are there impacts missing from the topic description? If so, please explain what could be revised and how it could be improved. 153

154 Question 10.b

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155 Are the disclosures and additional sector recommendations listed likely to generate critical 156 information on textile and apparel organizations' approach to hazardous chemicals, and how they manage related impacts? Is there anything missing? Please explain what could be revised 158 and how it could be improved.

159 Waste, materials and circular economy (page 34)

This topic covers organizations' use and impacts of materials and fibers, waste generation and 160 management, and the transition towards circular business models, including the barriers to this 161 162 transition. Reporting on this topic covers the most significant impacts of textiles and apparel organizations on material usage, including the use of recycled materials, waste generation, and 163 management, and the measures in place to promote circularity. 164

165 Question 11.a

Is the content of this topic clear? Are there impacts missing from the topic description? If so. 166 please explain what could be revised and how it could be improved. 167

Question 11.b 168

- Are the disclosures and additional sector recommendations likely to generate critical
- 170 Information on textiles and apparel organizations' approach to waste, materials, and circular economy and how they manage related impacts? Is there anything missing? Please explain 171
 - what could be revised and how it could be improved.

Non-discrimination, equal opportunity and gender (page 47) 173

- 174 This topic covers the impacts on workers within the textiles and apparel sector, such as gender-based
- discrimination and equal opportunity for workers regardless of their migrant status. Including, for 175
- example, the fact that the majority of the global workforce are women, yet rarely hold positions of 176
- seniority and management. Reporting on this topic covers a range of disclosures about diversity and 177
- 178 inclusion, parental leave policies, gender pay gap, and discrimination, harassment, sexual and gender-
- based violence both within the organization and its business relationships. 179



180 Question 12.a

Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how it could be improved.

183 Question 12.b

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 Are the disclosures and additional sector recommendations likely to generate critical information on textiles and apparel organizations' approach to non-discrimination, equal opportunity and gender, and how they manage related impacts? Is there anything missing?
 Please explain what could be revised and how it could be improved.

189 **Procurement practices (page 57)**

This topic covers the impacts of organizations' procurement practices, which can lead to forced or excessive overtime, late or reduced payments, child labor, and the use of cheaper or banned chemicals. Reporting on this topic refers to GRI 3-3 and additional sector recommendations. The additional sector recommendations cover the use of homeworkers, how organizations engage with suppliers, and the promotion of economic inclusion.

195 Question 13.a

Is the content of this topic clear? Are there impacts missing from the topic description? If so,
 please explain what could be revised and how it could be improved.

198 Question 13.b 199 • Are the

• Are the disclosure and additional sector recommendations listed likely to generate critical information on textile and apparel organizations' approach to procurement practices, and how they manage related impacts? Is there anything missing? Please explain what could be revised and how it could be improved.

203 Question 13.c

Is there any information your organization is currently reporting or planning to report on (with regard to its significant impacts on the economy, environment, and people) that is not reflected in this Standard? Please elaborate

207 Conflict-affected and high-risk areas (page 64)

- This topic covers the negative impacts on communities, workers, and the environment that organizations can be linked to when sourcing textiles, apparel, and especially jewelry materials and products from conflict-affected and high-risk areas (CAHRAs). Organizations are expected to conduct
- 211 due diligence to understand their involvement and mitigate their impacts. Reporting on this topic
- focuses on the organization's due diligence policies and procedures that it has in place.

213 Question 14.a

Is the scope of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how it could be improved.

216 Question 14.b

• Are there impacts currently not (sufficiently) covered by the disclosures in this exposure draft that you would expect to see reported by textiles and apparel organizations? If so, please explain what should be included and why.

220 Question 14.c

 Are the additional sector disclosures likely to generate critical information on textiles and apparel organizations' – including jewelry organizations' – approach to conflict-affected and high-risk areas and how they manage related impacts? Is there anything missing? Please explain what could be revised and how it could be improved.

225 Supply chain traceability (page 66)

This topic covers organizations' approach to supply chain traceability, which supports the identification of impacts, such as environmental and human rights impacts, within the supply chain. Traceability helps organizations assess and mitigate potential impacts within their supply chain. Reporting on this topic



- focuses on how organizations approach sourcing and tracing products and materials, as well as their 229
- participation in traceability initiatives, including those related to animal-based products. 230

231 Question 15.a

232 Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how it could be improved. 233

234 **Question 15.b**

235 Are there impacts currently not (sufficiently) covered by the disclosures in this exposure draft • 236 that you would expect to see reported by textiles and apparel organizations? If so, please explain what should be included and why. 237

238 Question 15.c

Are the additional sector disclosures likely to generate critical information on textiles and 239 240 apparel organizations' approach to supply chain traceability and how they manage related 241 impacts? Is there anything missing? Please explain what could be revised and how it could be 242 improved.

Open questions 243

244 **Question 16**

ung th this document does not represent an official for Do you have any additional comments or feedback regarding the textiles and apparel exposure 245 246

