

YESS STANDARD FOR FABRIC MILLS PUBLIC CONSULTATION FEEDBACK AND INCORPORATED EDITS

13 September 2022

Responsible Sourcing Network (RSN) performed a public consultation of its new *YESS Standard for Fabric Mills: Weaving & Knitting Operations Only* (standard). RSN received feedback from 17 organizations including international apparel, home goods, and footwear brands and retailers; yarn and fabric manufacturers; multi-stakeholder initiatives; and civil society organizations. Many comments were used either to (1) revise the standard, (2) provide guidance on the application of the standard (in procedural or training documents), or (3) were not incorporated because they were either beyond the scope of YESS, or too prescriptive for inclusion into the standard.

Comments that were incorporated into the *YESS Standard for Fabric Mills*

- Definition of “origin” now refers to the country of origin and the term “source” refers to “a geographic origin (e.g., community, state) or a supplier”
- To clarify the flow of the requirements, a flowchart was provided
- Definition of “low-risk source” was clarified with a table and more details were added to Annex I
- Deleted reference to RSN’s risk-determination methodology¹
- To distinguish low- and high-risk requirements, Table 3 was divided into Tables 3 and 4
- Section 2.3.e was updated to add a method for anonymous grievance reporting
- Section 2.4.b was updated to require farm level due diligence for all high-risk countries of origin
- Additional information on referral for remediation was added to the Introduction of the YESS Standards document per the OECD guidelines

¹ RSN’s risk-determination methodology has been replaced with a sample procedure that mills can use as-is or as guidance on minimum requirements for their own procedure. This approach aligns with OECD’s expectations that mills identify high-risk origins based on credible and current sources.

Comments that will be incorporated into guidance documents or trainings

- Communicating sourcing policy with transportation companies will be stated as a best practice
- Examples of how a mill can validate cotton as low-risk (they will incorporate the mills' local context or sourcing model without being too prescriptive)
- The distinction between responsibilities held by fabric mills and those held by their suppliers
- Resources will be added for mills to ensure suppliers are responsibly sourcing cotton and conducting due diligence
- Data and common risk factors that enable forced labor will not be provided in the standard, but may be provided by RSN or other stakeholders
- The standard will not ask fabric mills to consolidate their supply chains to avoid interfering with their business sovereignty. However, trainings will suggest the combined influence of mills will increase their leverage when asking suppliers to responsibly source cotton
- Examples will be provided of proactive measures to ensure success of a due diligence system and responsible sourcing policy
- Guidance on which entities are included as stakeholders will be addressed during training, with the local context whenever possible
- Forced labor awareness trainings (to be provided by RSN or other qualified experts) will address how to ensure anonymity for victims of forced labor
- Further specifics on responsibility of fabric mill to provide or contribute to remediation will be developed in the future
- The definition of "good faith and reasonable effort" was not incorporated because context and risks will differ and the standard should not be overly prescriptive, examples will be provided in trainings
- Additional guidance on how to cease, prevent, or mitigate forced labor in cotton production, or provide for remediation of harm, will be provided and expanded over time

Comments that were not incorporated into the standard

- Home workers are beyond the scope of the standard
- RSN is not currently an ISEAL member but following the principles as closely as possible and looks to be one in the future
- The grievance mechanism was not expanded past production to trade, handling, and transport
- The grievance mechanism will not include a "confidential feedback loop" as RSN believes it will be too difficult to implement, especially when a grievance comes from an anonymous source
- The definition of "traceability" will not be expanded to explain "track" to avoid over prescriptive or potentially misleading guidance
- The scope of the standard is set to initiate this due diligence approach and will not expand to be more robust or include the ILO 8 core conventions
- A "medium-risk" category will not be added for the sake of clarity although the term "isolated risks", referencing specific countries that warrant a different approach, is being

considered. In addition, due diligence would be required for "medium- or high-risk" so the differentiation is of limited value.

- The standard will not require a robust IT system to allow for less sophisticated mills. With this said, the IT system must be effective, include data governance requirements, and have systems in place to ensure that there is one record of truth. Additionally, each mill is required to provide three points of evidence for each requirement in the standard.