

October 9, 2024

Ms. Jenna Larkin Environmental Protection Agency Office of Chemical Safety and Pollution Prevention Environmentally Preferable Purchasing Program

Docket: EPA-HQ-OPPT-2022-0835

RE: Proposed Addition of Global Organic Textile Standard (GOTS) to the Recommendations of Specifications, Standards and Ecolabels for Federal Purchasing

Dear Ms. Larkin:

Thank you for this opportunity to provide feedback on the Environmental Protection Agency's (EPA) proposal to add the Global Organic Textile Standard (GOTS) to the agency's Recommendations of Specifications, Standards and Ecolabels for Federal Purchasing. The Organic Trade Association (OTA) applauds the executive order directing federal purchasers to prioritize products and services that positively address multiple environmental impacts, and appreciates the expansion of the EPA's recommended standards. We are especially encouraged by the addition of the GOTS standard to the Clothing and Uniform, Clothing Textiles/Fabrics categories.

OTA is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA is also one of four founders and standards holders of GOTS. GOTS sets the benchmark for strict environmental and social standards in the textile sector, with standards and inspection from field to finished products, and robust chain of custody requirements that give the certification strength, integrity, and global reach. Inclusion on the list of recommended standards opens purchasers to a wide selection of suppliers and goods already meeting the GOTS standards, and provides increased opportunities for companies seeking to expand sales of products meeting the GOTS standard.

Thank you again for this opportunity to comment and for the recognition of the GOTS standard.

Respectfully submitted,

Scott Rice Senior Director, Regulatory Affairs Organic Trade Association

Cc: Tom Chapman, Co-CEO

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