

**UTENOS TRIKOTAZAS**  
J. Basanaviciaus Str. 122  
28214 UTENA, LITHUANIA

## Letter of Compliance

### DETOX conformity through OEKO-TEX® and specific customer requirements

This letter of compliance includes specific customer requirements referring to the production processes as well as to the product itself. The letter applies to the following produced articles:

Knitted underwear, nightwear, sportswear and fashion clothing made of 100% organic certified CO or other natural fibres

A **DETOX TO ZERO** by OEKO-TEX® analysis was conducted in order to assess the status of the chemical management system and the quality of the wastewater. The product testing was carried out according to **STANDARD 100** by OEKO-TEX® **Appendix 6** and **additional analytical requirements**.

Specific requirements	Status
<ul style="list-style-type: none"><li>• DETOX TO ZERO by OEKO-TEX®<ul style="list-style-type: none"><li>○ Chemical Inventory: Compliance regarding the original 11 priority hazardous chemical groups<sup>1</sup></li><li>○ Wastewater: Compliance with additional requirements<sup>1</sup></li></ul></li></ul>	Status Report: 18000504/2 (Valid until: 31.10.2020)  Fulfilled  Fulfilled with conditional exemption (Please see Annex 1)
<ul style="list-style-type: none"><li>• STANDARD 100 by OEKO-TEX® Annex 6</li></ul>	Certificate: 22406-3101 (Valid until: 30.06.2020)
<ul style="list-style-type: none"><li>• Additional analytical requirements<sup>2</sup></li></ul>	Fulfilled (Please see Annex 2)

<sup>1</sup> For detailed information see Greenpeace Global Textile Procurement Trial Standard (Dec 2019) Annex 3, Chapter 1, and above mentioned DETOX TO ZERO by OEKO-TEX® Status Report.

<sup>2</sup> For detailed information see Greenpeace Global Textile Procurement Trial Standard (Dec 2019) Annex 3, Chapter 2 and BV test reports (25419)343-444598 and (25419)343-444597.

The **overall compliance** with the specific customer requirements **is met**.

Zurich, 09.12.2019



Georg Dieners  
Secretary General OEKO-TEX® Association

This letter of compliance is no regular OEKO-TEX® service and was issued on separate request of the customer only.

## ANNEX 1: Corrective action plan

The provided revised wastewater report (WW) doesn't completely meet the criteria given by the DETOX TO ZERO MRSL. The report from Intertek, dated 03.10.2019, shows that 9 substances were detected with concentration above the DETOX TO ZERO reporting limit. This affects 2 of the 11 priority chemical groups.

### Findings:

Substances exceeding the reporting limit	Reporting Limit <sup>1</sup> µg/L	Wastewater Result µg/L
<b>OTHER FLAME RETARDENTS</b>		
Sodium Tetraborate	0.5	73.0
Boron Trioxide	0.5	54.0
Boric Acid	0.5	96.0
Antimony Trioxide	0.5	17.0
<b>HEAVY METALS</b>		
Total Copper (Cu)	1	13.0
Total Zinc (Zn)	1	49.0
Total Manganese (Mn)	1	9.0
Total Antimony (Sb)	1	15.0

<sup>1</sup> Reporting limits are no limit values. Testing result exceeding the reporting limits must be reported

There has not been detected the use of any flame retardant chemicals or fibers during the audit, including sodium tetraborate, boron trioxide, boric acid and antimony trioxide.

The presence of sodium tetraborate, boron trioxide and boric acid has not been confirmed in wastewater as it is not possible to analyse directly for these in wastewater. The listed presence in wastewater of sodium tetraborate, boron trioxide and boric acid is based on the presence of boron in the wastewater, though this may be due to other forms of boron and not due to the presence of these three boron oxides.

Similarly, the presence of antimony trioxide has not been confirmed in wastewater as it is not possible to analyse directly for this in wastewater. The listed presence in wastewater of antimony trioxide is based on the presence of antimony in the wastewater, though this may be due to other forms of antimony and not due to the presence of antimony trioxide. The found value of antimony is presumed to originate from its presence in polyester where it has been used as catalyst during the fiber production.

As such, the listed concentrations of sodium tetraborate, boron trioxide, boric acid and antimony trioxide were calculated as "worst case scenario" of each specified compound.

The wastewater requirements of the Greenpeace Procurement Trial Standard (April 2019) for boron compounds and antimony trioxide have been reviewed. Due to the inability to analyse for these compounds directly in wastewater, and the potential to inaccurately report their presence in wastewater based on the presence of boron and/or antimony, and after discussion with technical experts, the requirements for reporting concentrations of sodium tetraborate, boron trioxide, boric acid and antimony trioxide in wastewater are removed from the Greenpeace Global Textile Procurement Trial Standard (Dec 2019) Annex 3. The requirements for determining whether these compounds are used within formulations, however, remain unchanged.

The levels for Copper, Zinc and Manganese are within the Greenpeace Requirements, however, the levels of antimony exceed the Greenpeace Requirements and are exempted subject to the following Corrective Action Plan (see Best practice conditional exemptions for specific cases).

**Corrective action plan to investigate the source of antimony and reduce this:**



**Statement**

UTENOS TRIKOTAZAS  
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LT 28214 UTENA

Date: 28.11.2019

**Corrective action plan to investigate the source of antimony and reduce this**

1. Yarn (PES and blends with polyester) Supplier survey	Till 30.11.2019
2. Whenever polyester is used, random testing to take place as a precaution. Reference for testing antimony is OEKO- TEX Standard 100 Appendix 6	No timeline (ongoing process) First testing till 30.01.2020
3. Finalizing analysis of supplier survey and test result from random polyester testing	No timeline (ongoing process) – update analysis data once significant knowledge obtained. First analysis results till 28.02.2020
4. Whenever polyester is processed, use of alternatives to reduce antimony in wastewater, and wastewater testing according to OEKO-TEX DETOX TO ZERO MRSL to verify if the antimony could be reduced in the wastewater	Depending on orders (whether there are order with PES). But not later than 31.08.2020
5. Commit to transition to antimony-free polyester in the next 1-3 years, and to publish a schedule based on the suppliers survey and testing of polyester.	The schedule should be published before the OEKO- TEX DETOX TO Zero audit to be renewed till 10/2020
6. Conduct OEKO-TEX DETOX TO ZERO Audit	Till 31.10.2020 (as the current version is valid until this date)

Signature

JURGITA STANKŪNIENĖ

Project Manager

Printed Name

Title

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## **ANNEX 2: Additional analytical requirements**

The following additional analytical requirements are no regular OEKO-TEX® service. Additionally to the STANDARD 100 by OEKO-TEX® Annex 6 the final product should be tested after the following criteria:

<b>Product Class</b>	<b>Analytical Requirement</b>
APs / APEO	2/2 mg/kg
PFOS / PFOA (apart from PFOA / PFOS)	Additional use of "mg/kg" 0.01 mg/kg
PFCs - FTOHs /FTA	0.2 mg/kg
Phthalates	30 mg/kg for each individual phthalate

The test results can be found in the BV test reports (25419)343-444598 and (25419)343-444597.

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## References:

- *Greenpeace Global Textile Procurement Trial Standard - Precautionary chemical management in textile procurement*, Version December 2019, <https://storage.googleapis.com/planet4-international-stateless/2019/12/884c7509-greenpeace-global-textiles-procurement-trial-standard-v.2-december-2019.pdf>
- *Status Report DETOX TO ZERO by OEKO-TEX® Utenos Trikotazas*, 18000504/2, 28<sup>th</sup> October 2019.
- *Corrective action plan to investigate the source of antimony and reduce this*, Utenos Trikotazas, 28<sup>th</sup> November 2019.
- *STANDARD 100 by OEKO-TEX®*  
[https://www.oeko-tex.com/importedmedia/downloadfiles/STANDARD\\_100\\_by\\_OEKO-TEX\\_R\\_-\\_Standard\\_en.pdf](https://www.oeko-tex.com/importedmedia/downloadfiles/STANDARD_100_by_OEKO-TEX_R_-_Standard_en.pdf)
- *DETOX TO ZERO by OEKO-TEX®*  
[https://www.oeko-tex.com/importedmedia/downloadfiles/DETOX\\_TO\\_ZERO\\_by\\_OEKO-TEX\\_R\\_-\\_Guideline.pdf](https://www.oeko-tex.com/importedmedia/downloadfiles/DETOX_TO_ZERO_by_OEKO-TEX_R_-_Guideline.pdf)
- *BV Test Report, T-Shirt Greenpeace, col. Green (100% CO)*, Report No. (25419)343-444597, 2<sup>nd</sup> Dec 2019 – 09<sup>th</sup> Dec 2019.
- *BV Test Report, T-Shirt Greenpeace, col. black (100% CO)*, Report No. (25419)343-444598, 2<sup>nd</sup> Dec 2019 – 09<sup>th</sup> Dec 2019.