



01 November 2023

STATEMENT OF INTENT

SUSTAINABLE FIBRE ALLIANCE



WHY A NEW STANDARD?

This section outlines why we think it is important for us to consider creating our own Standard.

Future proofing

A key aim of this review is to create a Chain of Custody (CoC) system that is future-proof. Not just in terms of creating a Standard that can be used for any type of animal fibre that might fall within the SFA's scope within the future, but also one that is fit for purpose in any jurisdiction across the world.

Creating our own CoC Standard will give the agility needed to respond to change, such as legislation (e.g. EU Green Claims Directive).

We also want to give businesses confidence that the sale of 'SFA Certified' cashmere will remain credible in the face of change, and provide assurance to customers and NGOs that the way 'SFA Certified' cashmere is traded can evolve with their expectations.

Better use of data

A secondary aim of this review is to make better use of data. We plan to create a system that standardises record keeping and generates big data in a useable way, such as in allowing traceability claims to be made credibly.

We want to create a safe and secure system that:

- paves the way for full traceability, once additional digital systems outside of the scope of this work are in place
- generates, archives and makes available data that allows us all to eliminate fraud and learn from our successes and mistakes
- allows sellers to make transparent, precise and compelling claims
- supports a growing and resilient supply chain where buyers and sellers can find each other rapidly



WHAT IS BEING CONSIDERED?

In pursuit of traceability

'Full traceability' means being able to track end products back to their original source through the entire supply chain. The benefits of traceability include, among others, the elimination of counterfeiting, real time asset tracking and enhanced credibility, adding up to improved retention and attraction of new customers ([Razak et al. 2021](#)). We want to create a CoC Standard that facilitates full traceability, once the digital systems outside of the scope of this work are in place.

From producer to retailer

We are considering a CoC system that covers everyone in the supply chain, from producers to retailers irrespective of where they are located in the world. While brands and retailers handling finished products with SFA hangtags will not need to be certified in the first version, this will be required in future versions.

Segregated

Our CoC Standard would require that certified cashmere is kept physically separate from non-certified cashmere through each stage of the supply chain. Mixing with other cashmere certified to the same Standard or another standard with which the SFA recognises equivalence would still be allowed, but the weights from different sources would be tracked to allow for full traceability. The current [SFA CoC Guidelines](#) already require full segregation from 1 July 2024.

Greater consistency in setting conversion factors

Conversion factors define the expected weight loss of product during processing, which means they have implications for monitoring volumes. We will tighten up the rules for record keeping for conversion factors to ensure greater transparency and consistency across the sector.



WHAT IS BEING CONSIDERED?

Disentangling assurance from doing business

The new Standard will focus on record keeping and transparency rather than hovering over transactions in real time. This means no transaction certificates, but thorough audits will mean severe consequences for those trading uncertified fibre as certified.

Whistle blowing procedure

We are considering a requirement for entities to have a prominent and accessible procedure for their staff to be able to directly and anonymously communicate with their CAB and/or the SFA. This provides additional assurance that poor behaviour is less likely in the SFA supply chain.

Blending with synthetic fibres

We are considering introducing a requirement that limits the blending of 'SFA Certified' cashmere with synthetic fibres. Plating (such as putting a synthetic heel into a cashmere sock) and the use of synthetic sprays and/or treatments may still be allowed. We are considering this because blending with synthetic fibres makes cashmere much harder to recycle, the environmental impact of which must be balanced against the benefits of product longevity.

Country of origin

A requirement that the country of origin is stated where geographic claims are made is being considered to prevent misleading claims about where products have been produced and or processed.

Conditioning weights

We plan to create a system for reconciling quantities that allows for variations in fibre conditioning (such as change in water content).



FAQS

Not another audit for another Standard

One of the reasons we are doing this review is to address the complexity and fatigue that comes with juggling the SFA CoC with the Textile Exchange CCS, depending on where the applicant is in the supply chain and the world. To reduce assessment fatigue and avoid creating duplicate systems we would seek mutual recognition with other similar standards.

How long would we have to prepare?

SFA members and scope certificate holders will be given enough time to adjust how they manage and handle 'SFA Certified' cashmere and clear any existing stock from their supply chain that doesn't meet the new requirements, if any. You will have a chance to give feedback on any proposed timelines.

What isn't changing?

The Standard will continue to rely on a third-party assurance scheme delivered by accredited Conformity Assessment Bodies (CABs). There will be a strong focus on eliminating fraud and counterfeiting, providing credibility and confidence to consumers and non-governmental organisations. We will continue to provide consistent and predictable outcomes for applicants.

We will still be implementing a volume-based fee system.





FORWARD PLAN

Development

Public consultation

We seek fairness and inclusiveness through consultation. Before the end of 2023 we will open a 60-day window for all stakeholders to provide feedback and be heard. In this we aim to secure strategic insight, build consensus and earn credibility. We will seek input from CABs to ensure that any new Standard is credible/works in practice.

Publication

We aim to complete this review before May 2024. Before then stakeholders can expect any new Standard with all supporting guidance, summaries and training materials, and a document that outlines the feedback we received from stakeholders and how it was taken in to account. Translations of key documents from English will follow.

Transition timelines

The sector will be given until six months after publication to become familiar with the new Standard. From this date (the 'effective' date) all new scope certificates will need to be against the new Standard. Since scope certificates last for one year, we would expect all old scope certificates to have expired by November 2025, meaning that all entities will have to be certified against the new Standard by then.

Contact and comments

We welcome and encourage feedback at all stages of this process. Please send any questions/comments you have regarding this plan to standards@sustainablefibre.org, noting that all feedback will be anonymised and published online.

