

---

# ZDHC Wastewater Guidelines Update

## Principles and Procedures

---

Version 1.0

*July 2023*

## NOTES

The information in this ZDHC Wastewater Guidelines Update Principles and Procedures is provided for information only and does not guarantee the following:

- a. Compliance with, or take the place of, legal or regulatory requirements. Examples might include: stricter legal, local or regional regulatory requirements on the use, storage and transport of chemical products; or other requirements relating to the handling and disposal of chemical products, which shall supersede any requirements as set forth in this document.
- b. Compliance with, or conformance to, any national or international environmental or workplace safety requirements, including, but not limited to, relevant regulations and/or standards.
- c. Nor do the ZDHC Wastewater Guidelines Update Principles and Procedures replace any national or international environmental or workplace safety requirements including, but not limited to, regulations and/ or standards.

The ZDHC Wastewater Guidelines Update Principles and Procedures is not intended nor can be used as a statement of legal requirements.

Although Wastewater Guidelines are the foundations of output management, there is an ecosystem of related documents that supports its implementation. The ZDHC Team is responsible for the update of those documents but the constructive feedback and technical inputs of the Wastewater Council is expected.

## DISCLAIMERS

Whilst ZDHC takes every reasonable effort to make sure that the content of this ZDHC Wastewater Guidelines Update Principles and Procedures is as accurate as possible, ZDHC makes no claims, promises, or guarantees about the accuracy, completeness, or adequacy of the contents of this ZDHC Wastewater Guidelines Update Principles and Procedures.

In no event will ZDHC (and/or any related ZDHC majority owned legal entities) or the Directors or staff thereof be liable and ZDHC expressly disclaims any liability of any kind to any party for any loss, damage, or disruption caused:

- a. By errors or omissions, whether such errors or omissions result from negligence, accident, or any other cause and/or;
- b. From any use, decision made or action taken or any other kind of reliance on the ZDHC Wastewater Guidelines Update Principles and Procedures by a reader or user of it and/or;
- c. For any results obtained or not obtained from the use of the ZDHC Wastewater Guidelines Update Principles and Procedures.

For the avoidance of doubt this Disclaimer applies to all related documents produced by ZDHC, specifically: ZDHC Wastewater Guidelines, ZDHC Sludge Reference Document, ZDHC Wastewater and Sludge Laboratory Sampling and Analysis Plan and ZDHC Wastewater Industry Implementation Approach etc.

# Introduction

The purpose of the ZDHC Wastewater Guidelines (hereafter referred to as “WW Guidelines”) is to set a single globally unified expectation for sampling, testing and reporting of industrial wastewater and sludge resulting from wet processing, across the textile and leather industry. Separate wastewater guidelines are available for Man-Made Cellulosic Fibres (MMCF) Guidelines.

The WW Guidelines is a living document, and this Wastewater Update Principles and Procedures document contains and explains the process for updating the current and future versions of the WW Guidelines. Specifically this document sets out to:

- Explain the guiding principles for each update.
- Outline the process followed by ZDHC and WW Council and clarify each stakeholder’s responsibilities.
- Summarise topics for consideration and the decision matrix.
- Provide transparency to the industry.

## Revision history

This is the first publication. A historical record of the updates will be included in the documents updates are published in the future.

# Contents

<b>1.0 Principles</b>	<b>6</b>	<b>Appendix A: Key stakeholders in the update process</b>	<b>22</b>
		Wastewater Council	22
<b>2.0 Process</b>	<b>8</b>	ZDHC Technical Focus Groups	22
2.1 Seven steps review process	8	ZDHC Competence Centres Team	23
2.2 Decision matrix	10	ZDHC Quality Management Team	23
2.3 The review process in details	11		
2.3.1 Step one: Proposals	11	<b>Appendix B: Decision making guidelines for the Wastewater Council</b>	<b>24</b>
2.3.2 Step two: Review of proposals and defining the scope of the update to the guidelines	11	Decision making	24
2.3.3 Step three: Finalisation of the update scope	12	Quorum (Minimum participation)	24
2.3.4 Step four: WW Council working and decision making	12	Voting	25
2.3.5 Step five: Consultation and review	12		
2.3.6 Step six: Review feedback & final draft	13		
2.3.7 Wastewater Council final approval	13		
2.4 Roles and responsibilities	14		
<b>3.0 Submission process and criteria</b>	<b>16</b>		
3.1 Identification of the proposing entity	16		
3.2 Clear indication of the proposed change	16		
3.3 Substantiating the request	17		
<b>4.0 Evaluation of submitted proposals and the decision making process</b>	<b>18</b>		
4.1 Evaluating submitted proposal based on the submission criteria	18		
4.2 Wastewater Council final decision and report to ZDHC	18		
4.3 Reviewing and acting on Wastewater Council decision	19		
<b>Candidate List</b>	<b>20</b>		
<b>Archive List</b>	<b>21</b>		
<b>Industry alignment</b>	<b>21</b>		

# 1.0 Principles

It is the responsibility of the ZDHC Quality Management Team, the Competence Centres Team (hereafter referred to as “CC Team”) and the Wastewater Council (hereafter referred to as “WW Council”) to ensure that the update process remains in line with the ZDHC principles, as described below.

**TRANSPARENCY:** Meaning using a publicly transparent process for receiving and evaluating proposals that relate to changes made to the ZDHC WW Guidelines or wastewater related documents. This was deployed with conducting an all Signatories and public review, to receive feedback and input on the edited guidelines before being published. In the future the Wastewater Module on the ZDHC Submission Platform will add an additional level of transparency.

**INCLUSIVITY:** Meaning engaging stakeholders from ZDHC Signatories i.e. Signatory Brands, Value Chain Affiliates (including the chemical industry, the textile, leather and footwear industry and Approved Solution Providers), Associates such as non-governmental organisations and industry association/multi-stakeholder organisations as part of the town hall/hackathon activity conducted by the CC team, the focus groups, or as part of the WW Council. Additionally, in the future any organisations and companies that are not ZDHC Signatories can be part of the update process by submitting proposals through the Wastewater Module in the ZDHC Submission Portal.

Furthermore, at the core of the WW Guidelines is a unified sampling and testing programme for the textiles and footwear industries, enabling the same wastewater test results to be shared across the industry. The wider ZDHC wastewater solutions enable a consistent and collaborative approach to corrective actions when non-conformities are found.

**BEST AVAILABLE INFORMATION:** Meaning applying a science based decision making approach, that considers both the degree of hazard and extent of exposure potential. Setting priorities using the best available data and information, as well as allowing for the incorporation of new information to ensure decisions remain as current as possible.

**MRSAL ALIGNMENT:** Meaning a regular update process that ensures any changes in the ZDHC Manufacturing Restricted Substances List (ZDHC MRSL) parameters, or additions/ changes to conventional parameters (heavy metals, anions) and their limits, as well as improvements in sampling procedures are reflected in the WW Guidelines. Proposed new substances parameters, limits, issues of concern to wastewater quality that may be considered for the next update to the WW Guidelines are placed on the ZDHC MRSL Candidate List giving advance notice to the industry of what to expect in future updates.

**REDUCE IMPACT:** Meaning that eliminating hazardous chemicals is a part of the overall sustainability of the industry, reducing possible risk and negative impact to human health and the environment is the overarching goal. As a result, our guidelines often go beyond regulatory conformance.

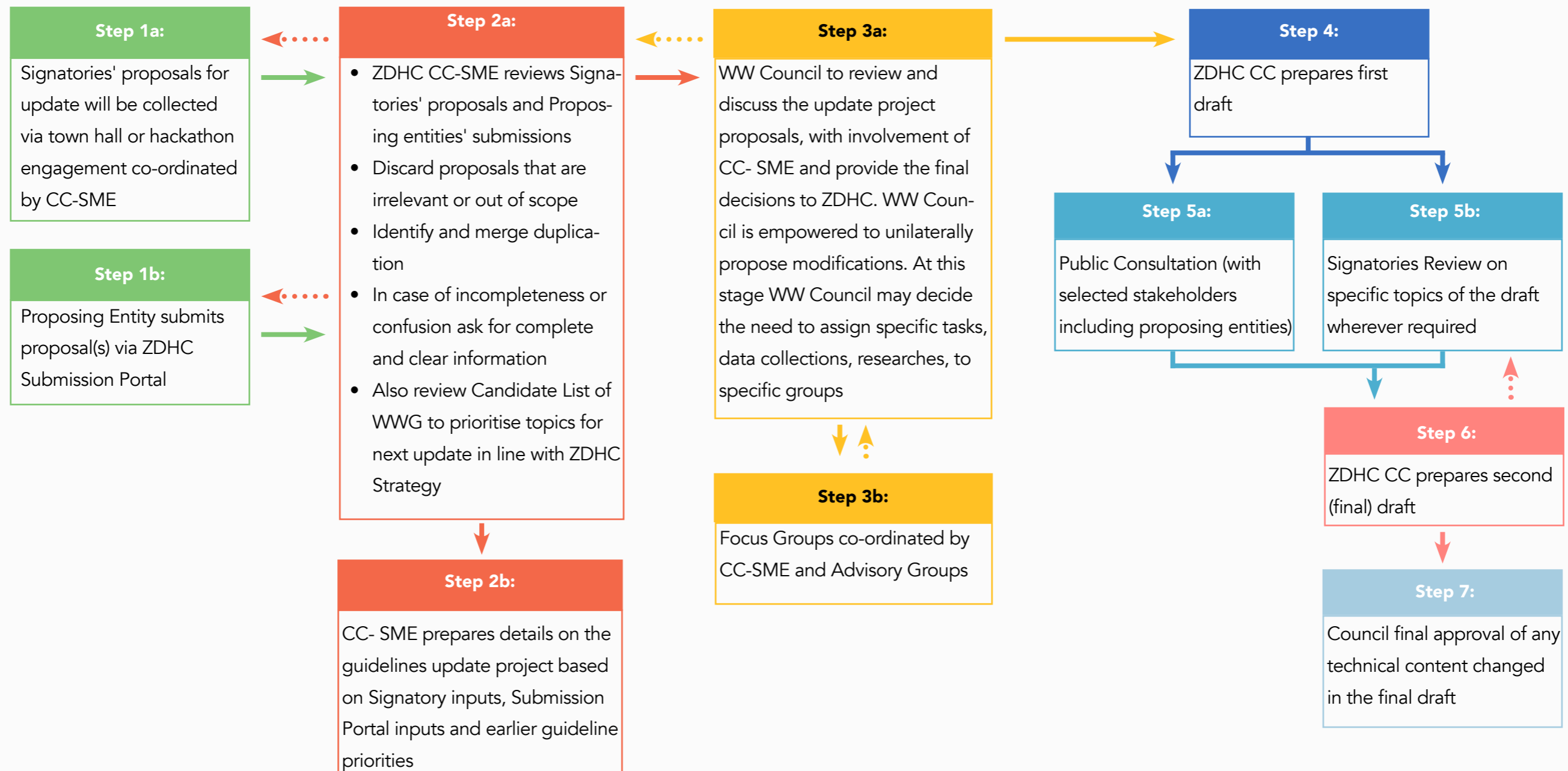
**EFFICIENCY:** Meaning a timely and dependable cycle of review, based on the efficient use of the ZDHC organisational resources. In addition, the WW Guidelines establish a harmonised industry standard thereby eliminating duplicative testing and providing the ability to share verified data via a ZDHC platform (ZDHC Gateway) by suppliers with their brands.

# 2.0 Process

## 2.1 Seven steps review process

The WW Guidelines update process can be summarised into a seven steps review, as shown in Figure 1. **While the Wastewater Module on the ZDHC Submission Portal is under development, all stakeholders can send a proposal according to what is indicated in our Knowledge Base article.** Submission criteria and information required will be detailed in the Wastewater Module in the ZDHC Submission Portal. A general indication can be found also in chapter 3.0.

This seven step review process takes place on a rolling basis, typically following the ZDHC MRSL. The update will involve particularly, but not exclusively, the review of existing parameters, methods and limits and the addition of new ones and will include requirements related to topics mentioned in the ZDHC Wastewater Guidelines Candidate List.



## 2.2 Decision matrix

The ZDHC Water SME (Subject Matter Expert), within the CC Team should provide the Wastewater Council with a recommended scope of the update project based on the feedback and suggestions from ZDHC Signatories via town hall meetings and/or hackathons and from proposals submitted by proposing entities through the Wastewater Module in the ZDHC Submission Portal. During Steps three and seven, the WW Council takes the final decision on the proposals, for inclusion in one of the below decision options below.

<h3>WW Guidelines Candidate List</h3> <p>The Candidate List is a signal of intended changes to future updates of the WW Guidelines.</p> <p>The aim of the Candidate List is to give advance notice to the industry of what to expect in future updates, and therefore gives the industry enough time to prepare for these, thus facilitating wide-scale industry adoption and implementation.</p>	<h3>WW Guidelines Archive List</h3> <p>The Archive List is considered for chemical parameters that are phased out by industry, or no longer present in wastewater or sludge.</p>
<h3>WW Guidelines Scope</h3> <p>Wastewater Guidelines are applicable to a well defined group of processes and activities. Any modification in the field of application of the guidelines will be reflected in the Scope of the WW Guidelines.</p>	<h3>WW and Sludge Test Parameters</h3> <ul style="list-style-type: none"><li>• WW Conventional Parameters, Anions and Metals</li><li>• MRSL Parameters</li><li>• Sludge Parameters</li></ul>
	<h3>Sampling Points and Sampling Frequency</h3> <p>Sampling, testing and reporting on ZDHC WW Guidelines shall be completed with a specific cadence that is defined in the document itself.</p> <p>The document also indicates the sampling points for the different discharge options.</p>

## 2.3 The review process in details

### 2.3.1 Step one: Proposals

The first step of the update process is to collect feedback, suggestions and proposals from ZDHC Signatories as well as the wider ZDHC community engaged in our ZDHC RtZ Programme. Proposals are collected in two ways: (1a) via town hall meetings and hackathons with ZDHC Signatories, organised by the ZDHC water CC Team and (1b) via the Wastewater Module in the ZDHC Submission Portal.

ZDHC Water CC Team will organise the town hall meetings and/or hackathon and these will be communicated through ZDHC newsletters and during Advisory Groups calls.

All entities and stakeholders can also input their proposals using the Wastewater Module in the ZDHC Submission Portal. For more details on the submission process using the Wastewater Module in the ZDHC Submission Portal and eligibility criteria of the proposals please refer to Chapter 3.0.

### 2.3.2 Step two: Review of proposals and defining the scope of the update to the guidelines

The review of proposals obtained through the Wastewater Module in the ZDHC Submission Portal will be carried out by ZDHC Water CC Team, to:

- Discard proposals which are not meeting eligibility criteria, are irrelevant or out of scope.
- Identify and merge duplications or overlaps between proposals.
- Seek clarifications from the proposing entity in case proposals are unclear or incomplete.

The outcome of this activity is to prepare a detailed document outlining the scope of the revision of the WW Guidelines to be shared with the WW Council.

### 2.3.3 Step three: Finalisation of the update scope

The scope of the update proposed by the Water CC Team will be reviewed by the WW Council members. Wherever required the WW Council may ask for clarifications or more details from the Water CC Team. The WW Council is also empowered to include additional topics, after discussion with the Water CC Team. The final scope of the update to the guidelines is then signed off by the WW Council.

### 2.3.4 Step four: Wastewater Council working and decision making

The WW Council starts to actively work on making decisions on the proposals and suggestions covered under the scope of the updates. The WW Council, in co-ordination with the Water CC Team, can decide to form focus groups drawn from ZDHC Signatories or from external experts on specific topics/tasks in the scope of the update for data collection or further research or technical inputs. The WW Council can also request ad hoc support from the ZDHC Advisory Groups for specific topics or tasks. The management of these focus groups, external experts and advisory groups in the update discussions will be the responsibility of the ZDHC Water CC and RtZ Delivery Team.

Based on the above, the WW Council will make decisions on the proposals and the Water CC Team, the Subject Matter Expert and Technical Writer, will create a first draft of the updates to the guidelines.

### 2.3.5 Step five: Consultation and review

The scope of Step five is to collect comments, suggestions, feedback on the first draft.

It is conducted with two simultaneous activities co-ordinated by ZDHC CC Team: one is the ZDHC Signatories review, the second is a public consultation that may involve one or more representatives of the following groups selected by WW Council and CC Team: like minded organisation, NGOs, government agencies, academic institutions, and other interested parties.

A timeline to provide comments, suggestions, and feedback on the draft document is communicated to these stakeholders.

The consultation and review period will be communicated to ZDHC Signatories via newsletters while the entities involved in the public consultation will be contacted via email.

### 2.3.6 Step six: Review feedback and final draft

Based on the feedback received from ZDHC Signatories and the public consultation, the CC Team will discuss them with the WW Council and it will make the relevant changes to the document and prepare a second/final draft.

When another round of review by ZDHC Signatories/ proposing entities involved in the public consultation is required, e.g. if there are substantial changes advised on the first draft, it will be the responsibility of the CC Team to co-ordinate this review step.

### 2.3.7 Wastewater Council final approval

In case the final draft includes substantial changes compared to the first one, a final approval of the technical changes will be requested to the WW Council.

The Council is entitled to approve or require technical modification.

After receiving WW Council approval, or after WW Council's required modifications have been updated, the document will go to the publication phase.

## 2.4 Roles and responsibilities

For a better understanding of roles and responsibilities of the involved parties please refer to the table below.

Step	Roles and Responsibilities	ZDHC CC Team	Wastewater Council	ZDHC Signatories	Entities involved in the public consultation	Any interested party
Submitting proposals (Steps 1a and 1b)	Submit proposal to update the ZDHC Wastewater Guidelines according to specified criteria.			✓		✓
Review and finalise proposals (Step 2a)	Review eligible proposals (received via town hall, hackathon and the Wastewater Module in the ZDHC Submission Portal, remove duplications, identify incomplete submission and gather complete information from proposing entity through the Wastewater Module in the ZDHC Submission Portal.	✓				
Prepare the proposed project scope (Step 2b)	Based on the proposals create a document that details the proposed project scope to the WW Council	✓				
Take the final decision on the proposed project scope (Step 3)			✓			
Seek the support of permanent groups such as ZDHC Advisory Groups or ad hoc focus groups			✓			
Co-ordinate the work of any focus group as per the scope assigned by the WW Council (Step 3)		✓				
Prepare the document that will be used to create the first draft (Step 3)			✓			
Prepare the first draft (Step 4)		✓				
Comment on the first draft (Steps 5a-5b)				✓	✓	
Prepare the final draft	Based on comments from first draft	✓				
Final approval before publication			✓			



## 3.0 Submission process and criteria

Further to the information provided in Section 1 of this document, in this chapter we provide a high level description of the criteria, required data, and information to be submitted by the proposing entities via the Wastewater Module in the ZDHC Submission Portal for updating the ZDHC Wastewater Guidelines. Proposals must be submitted and accompanied by required data and information outlined in this chapter.

Since the WW Guidelines update is a scientific-based evaluation, all submitted proposals should include any critical information to efficiently support the decision making process.

### 3.1 Identification of the proposing entity

Proposing entities should provide basic information including their name and email address when submitting a proposal. This is necessary to complete the process, especially to inform the proposing entity of the final decision of their proposal. ZDHC may also use this information during Step two when they communicate with the proposing entity to gain additional information or clarification on the submission.

### 3.2 Clear indication of the proposed change.

The proposing entity can input the following as proposals for the WW Guidelines update:

1. Issues or concerns related to WW quality that can be included in the ZDHC MRSL Candidate List of the WW Guidelines for future deliberations and updates.
2. Full information related to the issue, to justify the need for the issue to be addressed.
3. A substance that may not be in the ZDHC MRSL latest version, but is related to the quality of WW or formed during WW treatment and needs to be assessed in the discharged wastewater (which can be then be 'back-filled' in the MRSL), along with applicable textile or leather.
4. Changes in limit values or test methods.
5. Any parameter that is regulated but is missing from the WW Guidelines.

6. Suggestions on wastewater parameters that can be 'archived' from the WW Guidelines list to reduce unnecessary testing.
7. Suggestions on changes in sampling and analysis.
8. Any parameters and disposal pathways applicable for sludge evaluation.

### 3.3 Substantiating the request

Clear technical reasons and relevant documents shall be provided to substantiate the proposal, so the reasoning of what the proposed change is and the impact that this proposal (if accepted) is expected to have.

## 4.0 Evaluation of submitted proposals and the decision making process

This is with reference to the seven steps 'Review Process' given in Figure 1. If a proposal is incomplete or questionable, the ZDHC Water CC Team will contact the proposed entity to seek clarification and/or additional information. If no clarification or additional information can be obtained, the CC Team and the WW Council members may use their own expertise and connections to complete or verify the proposal themselves. There is no guarantee that an incomplete proposal will be taken into account.

### 4.1 Evaluating submitted proposal based on the submission criteria

Proposals which are complete and meet the eligibility criteria will be allocated for inclusion in the guidelines update project scope drafted by CC Team SME (Subject Matter Experts) and discussed by the WW Council when preparing the final scope of the update to the WW Guidelines.

The WW Council members will deliberate and discuss the proposals and suggestions for the guidelines update received through the Wastewater Module in the ZDHC Submission Portal and the Water CC Team and decide whether or not to include the proposal in the review based on; relevance, credibility, impact to the industry, existence of test methods and the overall strategy of ZDHC RtZ Programme.

### 4.2 Wastewater Council final decision and report to ZDHC

The WW Council uses this combined information to support their final decision. In the case of ambiguous data, the WW Council reserves the right to form a decision based on their experience and knowledge.

The final decisions of the WW Council, as well as the points discussed during the process of creating the first draft, are communicated and documented to the Water CC Team. The

WW Council should develop and submit a formal written decision for each proposal that is included in the update document drafted by the Water CC Team. The written decision should include a summary of reasons and justification for their decision. If the WW Council is not able to agree on a decision, the reasons should be summarised with both the majority and minority's opinions. The majority decision will become the official position of the WW Council.

### 4.3 Reviewing and acting on Wastewater Council decision

After the WW Council conveys their final conclusions and decisions in writing to the Water CC Team, it is the responsibility of the Water CC Team to prepare the first draft of the updated guidelines and coordinate and guide the consultation and review process together with the RtZ Delivery Team. The Water CC Team will actively handle the feedback and comments obtained through the public consultation and ZDHC Signatories review. These reviews may be conducted by the Water CC through calls or hackathons. Wherever relevant and required, the Water CC Team may consult the WW Council for their input on critical feedback received and discuss the replies to be drafted by the Water CC Team.

# Candidate List

The Candidate List in the WW Guidelines is a signal of the intended changes to future updates to the WW Guidelines. It should include issues or concerns or pressing industry challenges that need to be addressed in the future. It can also include considerations for future additions of new conventional parameters and MRSL substances that are important for wastewater quality, or intent to change limits for existing parameters or the need to include a new testing technique. It can also be an advance notice of change in ZDHC's approach to best practices for water and wastewater management.

Proposals to the Candidate List will be obtained through the Wastewater Module in the ZDHC Submission Portal and through the town hall and hackathon meetings by the Water CC Team with ZDHC Signatories and conveyed to the WW Council for consideration in the WW Guidelines update.

The proposals in the Candidate List give time to the industry to prepare for these before they are included in the WW Guidelines future updates and thus help to facilitate widespread adoption and implementation.

The industry challenges that are considered for inclusion in the Candidate List of the WW Guidelines should be detailed with a proper justification of intention for the restriction in future updates.

The Candidate List in the WW Guidelines may be different from the Candidate List detailed in the ZDHC MRSL.

The Candidate List proposals should be deliberated within the WW Council and Water CC Team and the proposals to be included in the final guidelines update should be agreed by the WW Council .

For parameters to be added to the Candidate List, they need to:

- a. Include "intention for restriction" alongside each parameter added explaining why the addition and its relevance to wastewater.
- b. Promote industry wide collaborative action on recurring non-conformances that are deemed 'industry wide problems' (such as antimony). This can catalyse action and reduce the number of ineffective, isolated corrective action plans (CAPs).
- c. Where possible, provide a time limited window for development of new testing or treatment techniques where the WW Council would like tougher limits that cannot be practically rolled out at the time of the update without creation of unmanageable numbers of CAPs.

# Archive List

A future archive list may be considered for MRSL parameters that are phased out by the industry, or no longer found to be present in wastewater or sludge. Decision on archiving ZDHC MRSL substances for wastewater testing would be supported by data from the ZDHC Gateway on the WW test results uploaded by suppliers.

# Industry alignment

The aim is for the WW Guidelines to be considered as the 'industry standard', the WW Council will take into consideration other published wastewater standards that include previous versions of the WW Guidelines. Industry alignment is very important and communication of intended changes is important and courteous.

The WW Guidelines will be published along with the industry implementation plan, which will be prepared by the RtZ Delivery Team and implemented by the approved wastewater testing labs, suppliers and ZDHC Signatory Brands to align the industry towards a harmonised approach.

# Appendix A: Key stakeholders in the update process

## Wastewater Council

The Wastewater Council is an independent group who uses an objective, science-based approach to review proposed substances.

The Wastewater Council is composed of technical experts (Council members) from diverse segments of the textile, apparel, leather, and footwear industry and other significant stakeholders with relevant industry knowledge and experience such as NGOs or academia. The group has a chairperson to manage and organise the group activities. This chairperson ensures the group reports its final decision on the Wastewater Guidelines content updates.

All Council members are onboarded to ensure their understanding of the Roadmap to Zero Programme, the wastewater ecosystem and the ZDHC vision and mission.

## ZDHC Technical Focus Groups

One or more technical focus group/s may be created based on the WW Council's request to support the WW Council's decision on one or more specific topics.

The technical focus group will be co-ordinated by the Water CC Team.

Any ZDHC Signatory with required experience, expertise can join the focus groups to aid in further research and expert knowledge sharing from the ground. Under specific conditions also experts that are not part of the Signatory group may be requested to join the group.

The technical focus groups do not have a formal vote in the decisions made by the WW Council.

## ZDHC Competence Centres Team

The ZDHC Competence Centres Team (CC Team) is responsible for various activities related to WW Guidelines update as indicated in Figure 1. They are the reference point for the ZDHC community for any wastewater related question or discussion and they play a vital role in supporting the WW Council managing the WW Guidelines update process.

## ZDHC Quality Management Team

The Quality Management Team oversees the overall update process and ensures respect of the rules defined in this Wastewater Principles and Procedures document and all the other relevant ZDHC internal policies and procedures.

# Appendix B: Decision making guidelines for the Wastewater Council

## Decision making

- The WW Council is an independent decision-making body and their decisions, although shared with the ZDHC Committed Community for review through a draft document, shall remain the final word for inclusion in the updates to the guidelines.
- In common with the decision making process in the ZDHC RtZ Programme and in the spirit of collaboration, the WW Council will strive for alignment on all decisions they are requested to make. This principle requires the WW Council to 'discuss then decide' rather than waiting for agreement on every detail.
- If an agreement by consensus cannot be reached, decisions can be adopted following voting, as the group itself determines appropriate – see Section on 'voting' below.

It is recommended for the WW Council to consider the recommended meeting quorum (minimum participation) and voting processes described below for guidance on best practices.

## Quorum (Minimum participation)

- Over two thirds of sectors should be represented in person, by teleconference or other communication equipment by which all members participating can hear each other to constitute a quorum (minimum participation).
- Where a quick decision is desirable the affirmative vote of a two thirds (66.6%) majority of the WW Council members present (assuming quorum) shall be necessary for the adoption of any WW Council decision.
- If a vote within a meeting fails to meet the above threshold, the Council will revert to remote voting by email and the decision will be made based on a simple majority of those sectors who vote – with the chair having a casting vote.

- Remote voting by email, with all Council members/sectors invited to vote is the preferred voting method and will be adopted in all cases except when time pressure requires in-meeting voting.

## Voting

In the event that a voting process is needed to make a decision the following applies;

- Each WW Council sector is entitled to one vote.
- Voting by the WW Council can occur in a meeting of the group and communication by which all persons participating in the meeting are able to hear one another, and such participation shall constitute presence in person at the meeting.
- Votes during an official meeting may be registered by voice, or votes can be registered electronically.
- For remote voting by email – each sector will provide their vote by an agreed deadline to either the chair or the Subject Matter Expert who will collate votes – the chair has a casting vote in the case of a draw.

It is intended to record decisions made by a voting process and the sector voting details in the Wastewater Module in the ZDHC Submission Portal Voting at an in-person or during a remote access meeting.

