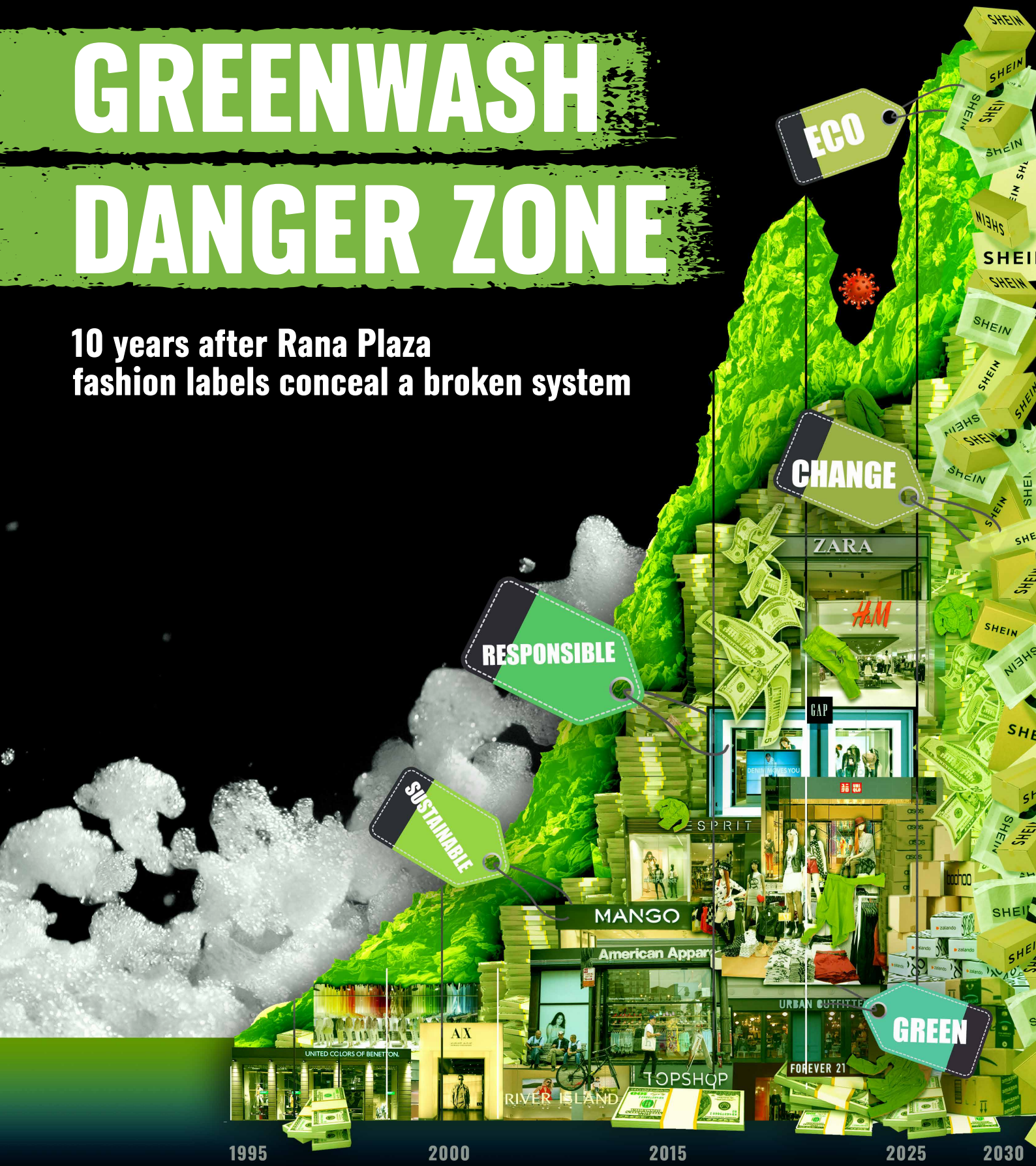


Report

2030
= 200 BILLION
PIECES

GREENWASH DANGER ZONE

10 years after Rana Plaza
fashion labels conceal a broken system



1995

2000

2015

2025

2030

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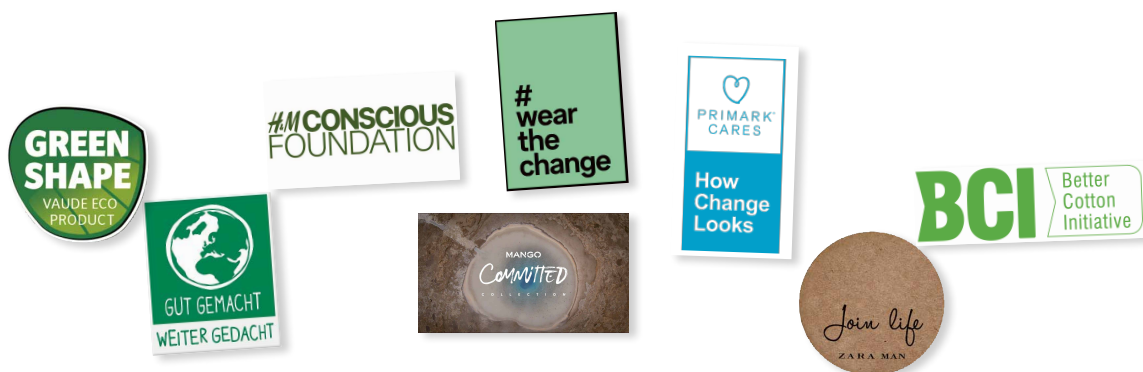
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Introduction

The collapse of the Rana Plaza clothing factory on 24th April 2013, where at least 1132 people lost their lives while making clothes, was the biggest catastrophe to hit the modern day fashion industry. This was a wake up call for everyone, and has since come to symbolise the devastating impacts of fast fashion, not only on workers in supply chains but from the whole life cycle of fashion which exploits people and nature from the cradle to the grave. It's now 10 years since the disaster – but what has changed since then?

There have been numerous initiatives aimed at tackling these problems, not least the Bangladesh Accord, initiated in the aftermath of Rana Plaza to address working conditions by Bangladeshi and global unions together with labour rights groups. It led to the creation of Fashion Revolution, now the world's largest fashion activism movement, which has the engagement of many non-governmental organisations. This included Greenpeace, which was already shifting the focus to global supply chains with its Detox My Fashion campaign, and successfully challenging brands to achieve zero discharges of hazardous chemicals into waterways and eliminate their use at supply chain factories.

However, over the last decade, the root cause of the fashion problem – the linear business model which depends on ever-growing volumes and turnover of disposable garments – remains unchanged. Despite the Rana Plaza disaster, fast fashion continues to grow apace. Clothing production doubled from 2000 to 2014, with the average person buying 60 percent more items of clothing every year and keeping them for about half as long.¹ The number of garments exceeded

100 billion by 2014 – and is projected to rise to over 200 billion by 2030.² It's hard to imagine how fast fashion could get any worse, yet this is already happening. The latest phenomenon – ultra fast fashion – championed by the Chinese online fashion brand SHEIN, has taken the fast fashion business model beyond the extreme.³

Yet the urgency of this destructive reality is not reflected by sustainability claims of the fashion industry – quite the opposite, they are used as a shield to maintain a broken system. Marketing by fashion brands can make it seem as if their actions are making a difference – but what's behind the claims made to consumers of fashion on the labels used to sell the “sustainability” of the garments, and are we just seeing greenwash?

More and more consumers are aware of the high environmental and social toll of fashion, and prefer to make a responsible choice. In Germany, 45% of people say they already buy second hand clothing to protect the environment and the climate, and 80% say they will pay more attention when buying new.⁴ But if they are trying to work out the sustainability of jeans, t-shirts or sneakers, they will be faced with a jungle of labels, tags, pictograms, acronyms and claims, most of them coming in green. Sustainability sells – even fast fashion is coloured in green now – the magic of marketing makes it possible.

To reveal what lies beneath the green sheen, Greenpeace decided to check out some of these self-assessed marketing labels. What is the basis of the claims that are made, how reliable are they and what do they actually cover? Can consumers take these labels at face value, and are they independently verified?

From a hidden problem – to taking responsibility

There was a time, little more than a decade ago, where the focus of fashion brands and European regulators was predominantly on product safety. Through the use of so-called Restricted Substances Lists (RSL), companies would monitor and restrict a number of hazardous chemicals to avoid harming their consumers' health – and their reputation. In the meantime, the globalised and cascading supply chain behind fashion hid a less glossy reality made of sweatshops, the breaching of human rights and freshwater pollution from industrial effluents carrying some of the most hazardous chemicals.

In 2011, Greenpeace's Detox My Fashion campaign was launched to tackle the latter issue and challenge the textile industry to take responsibility for supply chain pollution. Greenpeace confronted global fashion, sportswear, luxury and outdoor brands and multiple retailers with the evidence of their ecological impacts in the Global South – and together with Detox supporters, activists and non-governmental organisations from around the globe and their creative protests, petitioning and advocacy, we broke the silence around hazardous chemicals in the manufacture of clothing – and convinced 29 brands to sign a “Detox commitment”.⁵

Box 1: The Detox commitment

Detox-committed brands had to

- Eliminate the use and release of 11 groups of highly hazardous chemicals through their entire supply chain; these 11 groups formed the core of a Manufacturing Restricted Substances List (MRSL) to be extended to more chemicals, shifting the focus of brands responsibility from the final product to production in the supply chain.
- Monitor those chemicals in the wastewater (before treatment) of wet process

facilities, where textiles are washed and dyed, and publish test results on a public website.

- Make their suppliers list transparent, including wet process facilities, beyond their direct “tier 1” subcontractors.
- Publish annual Detox progress reports, including achievements, milestones, trends and, when relevant, root-cause analysis of any failing test.

This approach to chemical management through the whole supply chain has since been endorsed and developed by the ZDHC (Zero Discharges of Hazardous Chemicals), initially set up by Detox-committed brands to respond to the challenge of the Detox My Fashion campaign. Today it continues to expand, and currently has 62 brands and 8170 suppliers reporting their wastewater data on its Detox Live platform,⁶ as well as other contributors from the wider sector. Furthermore, MRSLs have become a must-have and a key element of many companies in the textiles sector and beyond as well as some certification bodies such as OEKO-TEX, Bluesign and others, with varying ambition levels on the scope of hazardous chemicals covered. The requirement for wastewater testing – absolutely vital as a ‘safety net’ to check the elimination of hazardous chemicals, is so far limited to ZDHC and OEKO-TEX. While legislation is still required to fully mainstream this to the whole textile sector, there is potential for this approach to be adapted to other equally chemical-intensive industrial sectors in the near future.

Beyond Detox – to the myth of circularity

While phasing out the use and release of hazardous substances is an absolutely necessary first step, on its own it is not sufficient. Seriously tackling climate change, the biodiversity crisis and the protection of oceans requires severely reducing the material intensity of fashion, currently driven by a linear business model that relies on overproduction and the promotion of overconsumption. Therefore, Greenpeace also challenged Detox-committed brands to take responsibility for the entire lifecycle of their clothes by “slowing the flow” and “closing the loop”. The concept of slowing the flow implies that fashion brands shift their business model towards long lasting design (produce less of better quality, make it repairable and reusable), extending product life (care & repair) and offering multiple uses of a product/material through services rather than selling (reuse, repurpose, second hand, renting, sharing, upcycling). Closing the loop implies circular design (make it recyclable), take back systems and recycling. The two concepts are interlinked, but to solve the problem, **slowing the flow takes priority** over closing the loop, because overproduction makes closing the loop impossible to achieve. Simply colouring a linear business model in guilt-free, recycled green can never be sustainable. And as Albert Einstein said “We cannot solve our problems with the same thinking we used when we created them.”

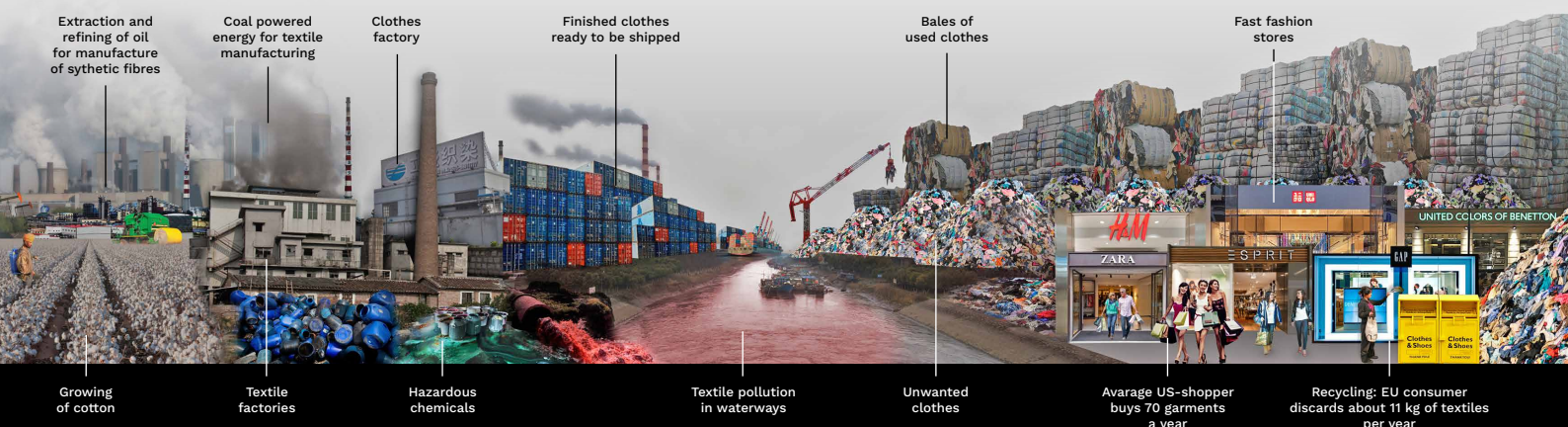
Rather than questioning their business models in-depth and starting to slow the flow, fashion brands,

including many that are Detox-committed, have put the majority of their efforts into a limited version of “closing the loop”. “Circularity” has become the buzzword among global fashion brands trying to clean up their image. Much of the companies’ implementation of circularity relies on the same elements

- Take-back programmes that mainly transfer their waste problem to the Global South;⁷
- Use of recycled content which relies on plastic waste from other industries (such as PET bottles) instead of textile-to-textile recycling, which not only doesn’t close the loop but helps the plastic industry to escape its own responsibility;
- Promising recycled and recyclable fashion, while the majority of garments rely of fossil-fuel based polyester which remains the main driver of growth – and overproduction – for the fashion industry, with its toll of hazardous chemicals, greenhouse gas emissions, microplastic fibres in our oceans and non-degradable textiles waste.

Despite the fashion industry hype, the reality is that circularity is virtually non-existent in the fashion industry; while less than 1% of clothes are recycled into new clothes, garment production volumes are growing by 2.7% annually.⁸ Every second a truckload of garments is burnt or sent to landfill. Helped by newer online retailers like SHEIN, the destructive fast fashion fad is speeding up, not slowing down.

Fast Fashion – from dirty production, to trends, to trash



Time to tackle the greenwash

To maintain and increase the quantities of clothes being made and sold, and compete with each other, many fashion brands are making big efforts to promote their “circularity” and “sustainability” initiatives. We investigated how fashion brands are communicating with their customers about their environmental and social performance, through self-assessed marketing labels of products sold online and in store. We found that although in some ways it is a major improvement that the environmental and social issues of producing clothing have found their way onto clothing tags and displays in shops, the effect is at best more confusing rather than helpful, and too often mere greenwashing.

A recent screening of sustainability claims in the textile, garment and shoe sector suggested that 39% could be false or deceptive,⁹ and a whole website about greenwashing has been created by Changing Markets, with fashion as one of three sectors. Some brands have even been called out by the authorities.

In 2022, fast fashion brand H&M was called out by the Norwegian Consumer Authority for its greenwashing, because the scorecard it was using for its

sustainable clothing – called its Conscious Collection – portrayed products as being better for the environment than they actually were, with even some apparent instances where the information about the sustainability of a product was completely opposite from the truth.¹⁰ The scorecards were created based on the Higg Material Sustainability Index (MSI) by the Sustainable Apparel Coalition (SAC), which has since paused the use of the scorecards and is reassessing their methodology. Experts are warning that “the industry cannot rely on trade associations as the arbiters of sustainability or eco-impact scoring,” pointing out that there is a “huge conflict of interest”, and that brands that want to be credible must use more independent, rigorous systems with integrity.¹¹ Since then, the Netherlands Authority for Consumers and Markets (ACM) has also sought reparations from Decathlon and H&M for making what it considers “unclear and insufficiently substantiated sustainability claims”,¹² part of a growing crackdown on greenwashing, which includes the UK Competition and Markets Authority’s investigation into claims made by ASOS, Boohoo and George at Asda, as part of a larger effort to develop its Green Claims Code.¹³

How fashion brands are hijacking circularity for greenwashing

When fashion brands talk about recycling and circularity – this is what actually happens



But pressure from civil society is gaining ground. It looks like the writing is on the wall for greenwashing in the EU. The European Commission has recently published a number of proposals including a directive on substantiation and communication of explicit environmental claims (aka Green Claims Directive).¹⁴ The EC states that “consumers are faced with the practice of making unclear or not well-substantiated environmental claims (‘greenwashing’) [and] with the use of sustainability labels that are not always transparent and credible” and therefore aims to establish clear EU rules on voluntary green claims while developing methodologies, benchmarks and indicators worth of trust.

At this critical moment for our common future, we don’t have the luxury to waste time on minimalistic steps and dead-end options, much less greenwashing. At the very least, fashion brands should make sure right now that their communication with their customers through product labelling is not misleading, and can be backed up by independent verification. Fortunately, the reliability of some of these independent standards is also on the radar of the EU, but this will be the subject of a sequel to this report. On the other hand, while some self-assessed marketing labels may be relatively reliable, it is hard to trust a self evaluation and we continue to witness an increase in greenwashing. With brands fixated on their messaging, it’s no wonder that the bigger and more systemic problem – the overriding need to slow down the production of disposable fast fashion – is not being addressed by the majority of fashion brands, and much less the sector as a whole.

Therefore we urgently need regulators to step in and implement stringent regulatory measures on Extended Producer Responsibility – already proposed as part of the EU’s Textiles Strategy – to halt this threat and address the reduction of material intensity. In the meantime, consumers and institutional buyers need to be empowered to help foster the change: sincere information on products and robust certification systems on both products and production chains are crucial.

Box 2: What are the “sustainable” materials on brand labels?

Very often, labelling by the brands communicates that the materials in a given product are “sustainable” or “responsible”. But how have the brands reached such a conclusion? The following summary shows that there are major differences between different material types in terms of positive and negative impacts on the environment, and that self-assessed brand labels often use oversimplified terms to sell “sustainability” to customers, without necessarily delivering on this promise.

The recycled polyester sustainability myth

Fast fashion relies on polyester (made from PET plastic), which makes up the largest share of materials used in clothing and has been projected by the fashion industry to increase further, fuelling the growth of fast fashion.¹⁵ Polyester and other synthetic fibres are based on fossil fuel and produced by the petrochemical industry, well known for its extensive impacts on the environment. These fibres are not biodegradable; microplastic fibres are released from clothes during production, and when they are washed by consumers, eventually making their way into rivers and seas, where they can potentially take decades to degrade.

Making clothes from plastic bottles will not solve fashion’s waste crisis:

There is no system for the large-scale recycling of used polyester fabric into new textiles.¹⁶ The majority of “recycled” polyester relies on ‘open loop’ sourcing of post consumer PET plastic bottles or collected marine plastics. However, this simply speeds up the conversion of solid material into more bioavailable microplastic fibres, released into rivers and seas when clothes are washed.

Once PET bottles are recycled into clothes this material is not likely to be recycled again and it will therefore become waste once the item is no longer useful.

Recycling PET into textiles also prevents the used PET bottles from being made into new bottles – which can be collected and recycled multiple times – in other words a circular system, unlike their use for a disposable unrecyclable textiles product. The majority of recycled PET is not used to make new PET bottles but gets diverted into other products like textiles, plastic trays and other packaging – which is not recyclable.¹⁷

The use of PET from the food industry for recycled textiles improves the energy and raw materials footprint of fashion brands – giving the impression that their actions are making an impact, when in fact this prevents a more circular recycling system for PET plastic – the most recyclable of all the plastics. Making fashion from plastic bottles is therefore a greenwashing tactic, while the belief that the clothes are sustainable encourages people to buy more.

There are also examples of clothes being labelled as ‘recycled’ with no evidence or traceability to verify this. The EU Commission has evidence that such fake declarations are widespread on the market, especially in the textile sector, when in fact the PET is virgin plastic.¹⁸

Finally, the fundamental issue with plastics recycling in general is that it cannot resolve the plastic pollution problem – globally, as of 2015, only 9% of all plastic waste ever created has been recycled. This is despite the decades-long focus on the recycling of plastics which is in fact used by the fossil-fuel industry as a smokescreen to enable increased plastic production and divert attention away from the systemic changes that are needed.¹⁹

Cotton – conventional, “better”, and organic cotton

Cotton is the second most important material used by the fashion industry after polyester.

Conventional cotton cultivation is associated with various ecological and social problems, in particular, the use of large amounts of water, pesticides and fertilisers, and the use of GMO seeds, which made up nearly 80% of all cotton planted in 2019.²⁰ A range of different standards seek to improve the situation on the basis of their respective sets of criteria, including Better Cotton by the Better Cotton Initiative (BCI), Cotton made in Africa (CmiA) by the Aid by Trade Foundation, Fairtrade by Fairtrade International and the Organic Content Standard (OCS) and GOTS from Textile Exchange.²¹ Organic cotton stems from organic cultivation and is usually certified in accordance with the statutory requirements for organic products in the EU or the United States. There are big differences between the approach taken by the Better Cotton Initiative (BCI or Better Cotton) compared to the cultivation of CmiA cotton, Fairtrade and Organic cotton.

The BCI is a multi-stakeholder sustainability initiative set up by a number of fashion brands together with WWF, in order to scale up the use of more sustainable cotton. It currently accounts for 20 per cent of global cotton production (4.7 million metric tonnes);²² in comparison certified organic cotton makes up just 1.4% of the market.²³ However, the BCI standard has several weak points; for example, GMO cotton is not excluded for production (while CmiA, Fairtrade and Organic prohibit GMOs) which drives down the availability of non-GM cotton seeds,²⁴ and only a very limited number of pesticides are prohibited. Most BCI cotton is produced on large estates in Brazil and Pakistan. There is no premium for Better Cotton certification, and it does not

encourage the uptake of organic cotton.²⁵ Compared to organic cotton, BCI offers the minimum principles related to water conservation and soil health, so it is easier and less expensive for growers to follow. As the biggest demand from fashion brands is for the cheaper, lower standard BCI cotton, it's no wonder farmers are shunning organic cotton in order to access larger markets.²⁶ Verification is only partly independent, and can also be conducted by BCI representatives and as well as through "self-assessment of the farms". BCI cotton was also sourced from the Xinjiang region in China and BCI has since recognised that "sustained allegations of forced labour and other human rights abuses in XUAR have contributed to an increasingly untenable operating environment".²⁷

BCI cotton is providing fashion brands with cotton which is only slightly better than the unsustainable mainstream cotton, with the lowest possible effort from the brands. This contributes to continued overproduction and overconsumption of clothes and thereby hinders much needed essential change of the current fashion system. Instead of settling for half measures such as Better Cotton, more brands, in particular global brands which hold a significant share of the market, should be prepared to source Organic and Fairtrade cotton and pay a higher price. This is the only way to make a significant positive impact on the environmental and human costs of conventional cotton.

Man-made cellulose fibres (CM, ZDHC)

Cellulosic fibres are relatively new but growing source of fabric for the fashion industry, they are made from natural materials (usually wood or another source of cellulose such as waste cotton), which is processed into fibres in a man-made process

A Changing Markets report first highlighted pollution from the manufacturing of viscose,

a man-made cellulose fibre derived from wood pulp, due to its prevalent production methods.²⁸ In this case alternative viscose production methods already exist, which do not rely on the use of toxic chemicals and where manufacturing takes place in a 'closed loop' to prevent the release of any chemicals which are used, as shown by Lenzing's production of Tencel, EcoVero, Modal Black and Modal colour. EcoVero has 50% lower emissions and uses 50% less water, compared to standard viscose and Modal Black and Modal Colour incorporate direct dyeing of fibres during the solvent process, resulting in savings of 90% on chemicals and significant savings in water, electricity, heat and wastewater.²⁹ The ZDHC also has Man-Made Cellulosic Fibres (MMCF) Guidelines which provide an aligned approach for cellulosic fibres, including defined chemical recovery, wastewater and sludge discharge, and emissions to the air.³⁰

Chemical recycling of natural fibres is also feasible using a cellulose dissolution technique similar to viscose manufacturing, as demonstrated by a project by VTT Research in Finland which is turning textile waste into new fibres.³¹ Similarly, Lenzing is using the Tencel production process for remanufacturing cotton scraps for its Refibra™ recycled cellulose fibre.³²

Apart from the need for minimal impacts during processing, cellulosic fibres also rely on forests which could be ancient and endangered forests. CanopyStyle initiative publishes a [ranking guide](#) of cellulosic fibre producers, which "provides a path for brands, retailers, and MMCF producers to help address the dual crises of climate change and biodiversity loss, by reducing the sectors' pressure on forests" and encourages producers to shift to sourcing materials that would otherwise go to waste and add to our landfills instead. [Criteria](#) on forest policy include an independent third party verified audit and traceability.

Assessing the self-assessed marketing labels of fashion brands

For this review, we looked at the practices of all 29 Detox committed brands, and selected those which use a product marketing label which have a defined slogan, using positive terms such as “eco” “green” or “cares” such as Join Life (Zara), or Conscious (H&M). These are used on all or a selection of a brand’s products, to communicate their environmental credentials to customers. We also widened the net to include some examples of other brands. These are Decathlon, a brand that was called out for green-washing by the Dutch regulator (along with H&M), the Italian brand Calzedonia and the German retailer Peek & Cloppenburg. While none of these brands is Detox committed, Decathlon is a member of the ZDHC. Calzedonia and Peek & Cloppenburg do not include any reference to Detox, an MRSL or wastewater testing for priority hazardous chemicals, and are not members of the ZDHC. Nevertheless, all the brands assessed have programmes on environmental and social responsibility at varying levels of sophistication, something that they aim to reflect in the various promotional labels which we assess here.

We identified some common patterns of concern which are relevant for many of the product marketing labels that we reviewed, which maintain business as usual, including:

- Confusing consumers with tags which are featured as if they were certified labels, which are sometimes named after company sustainability programmes.
- A lack of third-party verified or in-house evaluation of compliance with the best available standards on the environment, social and human rights.
- A lack of supply chain traceability beneath the label.
- Continued ignoring of “slowing the flow” options, no attempt to change business models.
- A misleading narrative about circularity that relies on the sourcing of recycled polyester from other industries instead of used textiles, and the collection of used clothes through take-back schemes which could actually end up as textile waste dumped in Global South countries.
- The misleading use of “sustainable” or “responsible” attached to “materials” which are slightly better than virgin or conventional fibres but cannot be described in this way, e.g. BCI cotton and recycled polyester (see box 2).
- The continued production of fibre blends such as poly cotton which are presented as greener due to their recycled content, despite the fact that mixed fibres are a one-off unrecyclable solution that do not close the loop.
- Continued reliance on the discredited Higg Index on Materials Sustainability – a product-focused tool for comparing the sustainability of different fibres, which does not take the whole life-cycle assessment of fibres into consideration, leaving out end of life, and ranks polyester as one of the most sustainable fibres.³³
- Not providing consumers and third parties with a breakdown of figures per material to substantiate the company’s green claims or its overall direction and long term strategy.
- Some labels highlight a single aspect of improvement in production, such as the reduction of water use or the reuse/recycling of pre-consumer waste.
- The initiatives that are highlighted can be on a small scale, without being put into the context of the larger volumes of business as usual.

This assessment should not be a surprise. There is a great deal of variation within this however.

Some of the more positive features of the best labels provide a pointer, including:

- Supply chain traceability on product websites and connected to the product itself (notably Coop, Naturaline). It's a positive sign that some other brands, such as Calzedonia & H&M, are in the process of developing traceability, although they are mostly still a work in progress and will need to aim for best practice to be worthwhile.
- Backing of the material's provenance with independent certifications (eg. Vaude Green Shape, Coop Naturaline, Tchibo Gut Gemacht).
- The specific exclusion of BCI cotton as part of the promotional label (G-Star).

Nevertheless, communication by brands about sustainability is not limited to marketing labels on products. Other brands use more low key forms of promotion, but deciding the positive or negative aspects of this is not always straightforward. For example

- UK brand Marks and Spencer communicates through product labelling and in-store advertising that it only uses “responsibly sourced cotton” or that a particular product is “responsibly produced” through the use of natural dyes. In fact M&S's responsible cotton relies on Better Cotton, which is defined by the industry and brands themselves and not the best or most responsible form of cotton, therefore open to question (see Box 2).
- Nike labels its products “SUSTAINABLE MATERIALS” meaning apparel is made with at least 50% recycled material, while for shoes it's 20%. The majority of this recycled material is likely to be derived from PET bottle waste from the food industry and not other textiles, perhaps not what the consumer buying the product would be expecting.
- “Adidas by Stella” is an eco-friendly capsule collection of loungewear, with some products in the collection made from 100% organic cotton and using innovative dyes that use less water, energy and chemicals – a good example but it's hard to judge its significance without more information about its scale relative to adidas' total volume of products, especially as its sustainability strategy relies on BCI cotton and polyester from PET bottle

waste.

- Similarly, Puma has several “Re:” collections as part of its “Forever Better” strategy, which are useful for experimenting with innovation, but need to be scaled up to have any significance and avoid greenwashing. Puma's Forever Better strategy as a whole relies on BCI cotton and polyester from PET bottle waste.

While it's hard not to be concerned that efforts such as these – whether they're part of a promotional label or a more general communication about sustainability or responsibility – are simply a fig leaf hiding a multitude of sins, there is definitely a need for companies to communicate their credentials which should not be discouraged. This just needs to be done more consistently, using independently verified standards rather than in-house subjective assessments, or industry-based assessment tools and initiatives. Most importantly, this communication should consider the aim of shifting linear business models towards a system where materials, workers and the environment are valued more than the volumes that are sold or profits for shareholders.

Ranking of fashion brand labels



COOP Naturaline
Vaude Green Shape



Tchibo Gut Gemacht
(Well Made)



Benetton Green Bee
C&A Wear the Change
Calzedonia Group
Decathlon Ecodesign
G-Star Responsible Materials
H&M Conscious
Mango Committed
Peek & Cloppenburg We Care Together
Primark Cares
Tesco F&F Made Mindfully
Zara Join Life

For more details on the assessment of brands' labels and explanation of criteria, see Annex.

Brand label	COOP Naturaline	Vaude Green Shape	Tchibo Gut Gemacht (Well Made)	Benetton Green Bee	C&A Wear the Change	Calzedonia Group	Decathlon Ecodesign	G-Star Responsible Materials	H&M Conscious	Mango Committed	Peek & Cloppenburg We care together	Primark Cares	Tesco F&F Made Mindfully	Zara Join Life
Overall rating														
Reports on the % of its products represented by label														
Clear and accessible specification of what qualifies for the label														
Label is backed by third party verification														
Avoids recycled PE from PET bottle waste as a "sustainable" material for its label														
Avoids BCI cotton as a "sustainable material" for its label														
Avoids relying on the Higg MSI Index for materials in its label														
Disclosure of material volumes, percentages, and a breakdown of material types														
Slowing the flow commitment and initiatives														
A living wage for workers in supply chains														
Transparent suppliers list														
Supply chain traceability on product label +/- web-shop														
Publication of Detox wastewater data														
Has a best practice chemicals list for supply chain (MRSL)														
Avoids crossing any red line, or any other outstanding concern														

Conclusion

The global textile industry is characterised by serious negative environmental and social impacts. A large part of this is due to the textile production phase, which takes place predominantly in countries in the Global South. The textile industry is responsible for five to ten percent of global greenhouse gas emissions³⁴ – with 85% of its greenhouse gas emissions from the supply chain which is mostly located in the Global South.³⁵ Also gigantic is the water consumption of textile production, which at 93 billion cubic metres per year;³⁶ this water is not only consumed,

but also heavily polluted. The intensive use of pesticides and artificial fertilisers also harms the environment and leads to species extinction, soil leaching and acidification of inland waters and seas. Only the smallest proportion of disposed clothing is recycled.³⁷ The majority is incinerated in the countries of the Global North or exported to the Global South, where it floods the textile markets, is burnt or dumped. Worldwide, one truckload of clothing is incinerated or disposed of in a landfill every second.³⁸

6 fashion facts



This is the reality of the impact of fashion. But the fashion industry as a whole is communicating an alternative and misleading narrative about circularity, and promoting this as the solution to its environmental and social impacts, without acknowledging that **slowing down the flow** of materials should be the primary focus of any “sustainability” initiative. Although there are notable exceptions, many brands are then amplifying this false narrative in their self-assessed marketing labels – which inevitably strays into the territory of greenwashing. Our assessment confirms that many of these labels are perpetuating greenwash – with the risk that by repeating this flawed narrative the lie becomes the truth, people come to believe the fantasy and forget about the problem. **The simple truth is that fast fashion will never be sustainable.**

While this circularity narrative relies heavily on the recycling of plastic bottles from the food industry into polyester, it is the reliance on polyester for clothing that is fuelling the continued growth of fast fashion – and now ultra-fast fashion. Polyester is a fundamentally flawed material which embodies the devastating impacts of the fossil fuel industry, the inevitable creation of plastic waste and the unavoidable release of microplastic fibres into the air, water and soil. Matrices and indexes such as the now discredited Higg MSI Index have played a significant role in driving the use of synthetics for fashion – by ranking polyester, especially recycled polyester, above natural materials and even organic cotton, and avoiding consideration of the full life cycle impacts from production through to disposal.

While brands are now promoting new ways to assess the materials that they use for their materials, these tools can still be flawed in one way or another. Meanwhile many brands are reluctant to publish the most basic information that would establish a baseline of the impacts of the materials used; that is, the volume of each material that they use – whether that’s cotton, polyester or cellulose fibres, whether they are organic, conventional, recycled, certified or otherwise – as well as their percentages. But this is the necessary basis of slowing the flow. Publishing material tonnages would enable transparent tracking of the scale of brands’ impact on the climate and biodiversity, and allow progress to be measured on slowing the flow and the shift to better materials to be tracked year on year.

This basic information on material volumes is hardly reported by any brands and is not even a requirement under the most commonly used reporting measures such as the GRI, a voluntary but standard measure which is widely used. Companies can claim confidentiality and not disclose this information, as claimed by Puma for example,³⁹ or H&M, which reports the percentages of individual materials but not the volumes.⁴⁰ This information is just as important as reporting of greenhouse gas emissions and should be the basis of sustainability claims.

Unsurprisingly, our assessment confirms that self-assessed marketing labels by brands can be challenged as greenwashing, a trend which has picked up speed in recent years. These “fake standards” ensure that fast fashion giants do not have to adhere to the strict rules of independent standards, but can virtually write the rules themselves. Sustainability has become a communication goal without really putting credible measures in place to realign their linear business models.

Recommendations for brands

Greenwashing is a symptom of the bigger disease – the destructive system of the linear fast fashion business model which can never be sustainable. If fashion brands honestly want to address their environmental and social impacts they need to work towards creating slow, circular fashion that respects environmental boundaries and the rights and well-being of people.

Global fashion brands need to completely change their linear business models and become service providers instead of only producers. This involves a fundamental change, where success is not defined by the volumes that are produced and sold, or by shareholder profits,⁴¹ but by the high standards in supply chains and beyond – where “externalities” such as impacts on nature and on the people making clothes or dealing with textile waste in the Global South are no longer devalued. This also means innovation in alternative ways to engage with customers on fashion, beyond the model of buying new. The following steps need to be taken, so that this can become the new normal:

- Start producing fewer clothes that are designed to be better quality, long lasting, repairable and reusable.
- Do not bring textiles on the market that cannot be recycled in established textile-recycling systems which are easily available, for example fibre mixes.
- Take responsibility for establishing take-back systems and services to maintain, repair and share items of clothing.
- Set a target of only about 40% of clothes to be newly made, with 60% from alternative systems such as repair, secondhand, renting and sharing by 2035 at the latest.⁴²
- Publish data on the volumes of each material category used every year in its GRI reporting, including the volumes of sub-type (eg. organic, recycled, or other certified or non-certified material) within the material category, and track the year on year progress
- Once this baseline is established, set meaningful targets for only the best independently verified environmental options for material choices.
- Develop communications with customers based on all of the above, thereby avoiding greenwashing with false narratives or claims that can't be substantiated.

To guide these communications, the following should be taken into account for any self-assessed product marketing label:

- Clear reporting on the scope of the label, the volumes and percentages of the materials that are represented within the label itself and in relation to its overall use of material.
- Clear information for consumers about what the label represents, as well as what it does not cover ie. which materials or processes, social issues.
- Traceability of the supply chain that manufactured the product – on the individual product label and on the website.
- Independent verification clearly visible for any criteria that justifies the label allocation.

These steps are not an optional extra: if companies don't act voluntarily to change their business models to adapt to the reality of the climate crisis, ultimately the courts or governments will be forced to intervene, as in the recent cases in the Netherlands and France.

Recommendations for the EU to tackle greenwashing in the fashion sector

Regulators have the responsibility to push for the transformation of business models and to avoid protecting business as usual. The greenwashing problem has revealed the huge potential for miscommunication about “sustainability” that maintains the status quo. In its proposal, the European Commission seeks to provide a harmonised metric system based on life cycle analysis, the Product Environmental Footprint Category Rules (PEF-CR) for apparel and footwear. However, public interest groups are concerned about the current development of the PEF and “believe there is a risk that the PEF-CR for apparel and footwear will give a limited and unholistic picture of product impact. As such, it is our view that the PEF-CR for apparel and footwear should not be used as a standalone method for underpinning labelling, green claims made in marketing, or any other EU policy measures announced as part of the EU Strategy for Sustainable and Circular Textiles”.

Therefore, it is vital that such a tool should avoid loopholes that repeat a flawed assessment, similar to the Higgs MSI Index, which favours synthetic fibres over natural fibres and/or is protective of the business models of big brands. Any pretext that best practices are not scalable and cannot be adapted to big business would be a missed opportunity to recognise and reward these practices. Instead **we need to encourage the growing of certified organic natural fibres as part of a circular Detoxed production chain supply that creates long-lasting designs suitable for repair, reuse and recycling within a service-based business.** Any metrics on recyclability and recycling must be backed by evidence of real world practices rather than wishful thinking, and not ranked positively based only on their theoretical potential. Also, while physical properties are a major part of durability which can favour synthetics, this is not the only factor to consider; emotional durability is equally important as this provides the incentive to care for garments, which also represent the skills of workers in the supply chain, traditions and innovation, and quality of design, which cannot be reduced to a metric.

Equally, we need to establish red lines that should not be crossed in any metric used for the promotion of environmental or social credentials by fashion

brands in their sustainability programmes or their self assessed marketing labels. Any metric that gives a higher ranking to a product made from fossil-fuel, with inherent waste problems of plastic and dependent on polluting production and hazardous chemicals, would be another failed opportunity. This could be avoided by ensuring that activities with irreversible impacts are not permitted and cannot be undermined by the excuse that there is incomplete knowledge about impacts (or that these could be offset through other strategies). In other words, fully implementing the Precautionary Principle.

Some examples of what Greenpeace would consider to be red lines are:

- The use of toxic, persistent or bioaccumulative chemicals in products and in supply chains.
- The use of non-biodegradable fossil fuel based materials which shed microplastic fibres.
- The destruction of important ecosystems and habitats such as old growth forests.

In addition, the environmental footprint is just one side of the problem. The other side is the social and human rights of workers and people that are impacted by the whole life cycle of fashion, including from textiles waste exported from the EU, whichever route it takes to the Global South. Therefore red lines for social standards should also be established, in consultation with NGOs with relevant expertise.

Additional specific measures to control greenwashing in any proposed regulation should include:

- Only permitting the use of terms such as “eco” “green” “natural” if the provenance of a product can be verified independently.
- A ban on sustainability claims that do not go beyond basic compliance with legal or market requirements and cannot be proven.

Overall regulatory demands

A strong EU supply chain law should include:

- Transparency and the Public’s Right to Know: Public disclosure of suppliers by companies (to the raw material level, including all manufacturing steps, using a unique identification number for facilities).
- Public disclosure of testing and auditing results.
- Institutional support for global harmonised platforms and reporting systems (such as the IPE or ZDHC disclosure platforms, although the latter is still missing public data access).
- Best practice needs to be specified to ensure the highest standards and proper accountability (eg. best practice laboratories and testing requirements).

Greenpeace welcomes the positive developments in the EU textile strategy, but for them to be successful they need to be implemented effectively on the ground through legally binding measures.

Unfortunately it also does not include:

- A strategy to Detox the textiles supply chain and prevent chemical pollution of Global South waterways.
- A phase out of synthetic fibres in the production of textiles; products should be biodegradable and compostable (Cradle to Cradle) and free from hazardous chemicals to prevent end of life impacts.
- Binding requirements for durability and ecodesign under the EU Textiles Strategy.

For further details of Greenpeace’s recommendations, please refer to previous reports.⁴³

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Annex

2030
= 200 BILLION
PIECES

GREENWASH DANGER ZONE

10 years after Rana Plaza
fashion labels conceal a broken system



Content


1.


Annex. Details of the assessment of brands' labels


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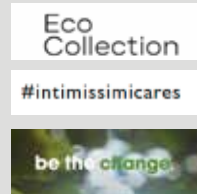
Coop Naturaline	
Introduction	Coop's Naturaline label goes back 25 years and reflects its commitment to organic cotton, with the exclusive use of BioRe organic cotton which is fully traceable and fairly traded.
Positive	<ul style="list-style-type: none"> Products with the Naturaline label are made of 100% organic cotton, and Coop is one of the world's largest suppliers of organic and fairly traded cotton. Products labelled Naturaline have traceability of the supply chain right back to the farm, and including the wet process suppliers, via my-trace by Remei (BioRe). States that textile life cycles must be slowed down and takes a "conscious stance" against fast fashion with its Naturaline label. In general, it focuses on a standard range with basic models and two collections of selected seasonal pieces a year. Closing the loop focus is on keeping clothes in use.
Negative	<ul style="list-style-type: none"> Although Coop is Detox Committed and refers to the testing of wastewater at suppliers, wastewater data for all suppliers is not published. In contrast to the supply chain transparency for its Naturaline products, there is no apparent list of textiles suppliers published. The proportion of Coop's clothing that is Naturaline is not clear; although Coop mentions that 86.3% of the cotton in its clothing and home textiles is certified, a variety of labels are mentioned and the percentage that is organic isn't specified. Has a strategy for living wages, but is aware that not all workers are paid a high enough wage in all countries.
Logo	
Conclusion/evaluation	Green – credible
Other information	Naturaline is a label founded by the company itself. It represents a single material type which is backed by independent certification and has full traceability. Coop is a Detox Committed company.

Vaude Green Shape	
Introduction	Label developed by the company itself for Vaude products that, according to Vaude, are more environmentally friendly than others. The label is also partly based on other quality marks.
Positive	<ul style="list-style-type: none"> The label is regularly updated; currently close to 90% of Vaude apparel is Green Shape A minimum of 50% recycled or bio-based materials must be used, which are required to be certified Longer use, servicing and repair is a requirement, along with high quality plus participation in take-back, reuse, recyclability Verified social standards (Vaude has Fair Wear Foundation leader status) Products must not require dry cleaning Ban on PVC, fluorocarbons, bleaching agents containing chlorine and hypochlorite and nanotechnology Vaude discloses the volumes of material types it uses Vaude has a traceability system for some of its products online
Negative	<ul style="list-style-type: none"> Apparel and other outdoor products depend on plastic and recycled polyester is not textile to textile but from plastic from the food industry. No target on the reduction of plastic fibres. Its product traceability system is not in place for all products and only links to the first supply chain tier (not to the wet processor)
Logo	
Conclusion/evaluation	Green – credible
Other information	Vaude Green Shape is a label founded by the company itself. It represents the majority of Vaude's products and includes criteria for slowing the flow. Vaude is a Detox Committed brand and has eliminated the use of "forever chemicals" PFCs in its products.


Tchibo Gut Gemacht (Well Made)	
Introduction	With the Gut Gemacht label, Tchibo identifies products that, according to the company, meet higher environmental standards than other products in its range.
Positive	<ul style="list-style-type: none"> A clear list of the certified materials used for Gut Gemacht products, including organic cotton, recycled synthetic materials and cellulose fibres Tchibo's goal is for 100% of its textiles to be made from sustainable materials by 2025 (currently 70%) 98 per cent of cotton products are certified organic or CMIA (Tchibo is the 3rd highest user of organic cotton) and cotton accounts for 48% of all textiles. BCI cotton is not included. Discloses the volumes and percentages of the material types that it uses. Tchibo could improve further by reporting separately on organic and CMIA cotton. Recycled natural fibres are used in cashmere and Tencel; Tchibo's long term goal is to design products so that most of the components can be recycled at the end of their lives. Tchibo names the direct suppliers for many products in the online shop.
Negative	<ul style="list-style-type: none"> Less strict requirements in other product areas (e.g. coffee, decoration) – potentially confusing for consumers. About 48% of its textiles are synthetic. Recycled polyester is not textile to textile but from plastic from the food industry, although it recognises this as an interim step towards textile to textile recycling. No information on the reduction of plastic fibres. No indication of deceleration of production cycles. Has a strategy for living wages, but is aware that not all workers are paid a high enough wage in all countries.
Logo	 <p><i>Well Made; Forward Thinking</i></p>
Conclusion/evaluation	Yellow - almost credible
Other information	Tchibo Gut Gemacht is a label founded by the company itself. Tchibo as a whole and the Gut Gemacht label uses certified organic or CMIA cotton and not BCI cotton, although it does use recycled polyester from bottles. Tchibo is also a Detox Committed brand.


Benetton Green B	
Introduction	Green B is an umbrella which communicates all of Benetton's environmental initiatives but is also a tag (featuring a green bee) for customers to identify more sustainable products. Green B products make up 12 % of Benetton's whole collection.
Positive	<ul style="list-style-type: none"> Benetton has a good record on chemical management and transparency in its supply chain. The company is actively developing recycled wool. Making and promoting technical and emotional durability of products is part of the company's identity and strength. Benetton reports on the volumes of material categories it uses, and gives an overall percentage for natural materials of nearly 80%, but it doesn't break these figures down into sub-types such as organic or recycled.
Negative	<ul style="list-style-type: none"> A Green B tag directs customers to all products made of "sustainable materials" but these are defined too broadly and include: <ul style="list-style-type: none"> BCI cotton under "sustainable cotton". Recycled polyester from PET bottles from the food industry. Polycotton blends of organic or recycled cotton with polyester/acrylic. Other natural fibres such as wool and linen are included while the remainder is cellulose-derived materials and Econyl recycled nylon. For Green B organic cotton and recycled wool/cotton/polyester, Benetton refers to "certified supply chains" but it is hard to find details of which certifications this refers to (OCS, RDS, GRS, GOTS). Also, this information is not provided for customers on its web-shop. The communication and reporting on the percentages of material types used and their targets is confusing, including those covered by the Green B. Despite the high profile of Green B (it is also the name of a "sustainability" concept store in Florence), Benetton is not using its historic focus on quality products and reliance on natural fibres to its advantage to increase its level of ambition – for example, there is no target to increase fairtrade organic cotton versus BCI. There is little information on tackling post-consumer waste and helping to close the loop. The Green B tag doesn't cover social issues and Benetton doesn't provide any evidence of paying a living wage to workers in its supply chain.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	Green B is a label founded by the company itself. Benetton is committed to "produce less, produce better" but it needs to provide more accurate and factual information and rethink its definition and ambition on sustainable cotton. Benetton is a Detox Committed brand.


C&A Wear the Change	
Introduction	Wear the Change began as a sustainability initiative. C&A has adopted it as a corporate-wide campaign in 2020 in Europe and as the identifier for its global 2028 Sustainability Strategy.
Positive	<ul style="list-style-type: none"> C&A is the largest buyer of organic cotton, it also reports the volumes and percentages of materials used showing that 62 % is cotton. C&A informs us that the share of organic cotton in fiscal year 2021 was more than 40 %, but this isn't included in its published figures, which refer to volumes of "sustainable" cotton. Publishes a supplier's list and wastewater data of its suppliers. Target to extend the life of 7 out of 10 products by 2028. Wear the Change items include a large proportion of organic cotton garments (over 4000) compared to less than 100 made with recycled polyester. Wear the Change products all have third party certifications.
Negative	<ul style="list-style-type: none"> Information for consumers about what Wear the Change covers is hard to find. Products with varied specifications receive the same „green“ label. Wear the Change criteria is not yet adopted for all of C&A's garments C&A has a target to replace 50 % of single use plastics with sustainable alternatives by 2028, but this does not include the use of plastic textile fibres. The use of "sustainable" is misleading; as of 2021, 77 % of C&A's materials are "sustainable" with a target of 100 % by 2028, however, this includes recycled plastic fibres and BCI cotton which is unreliable – so C&A's claim that 100 % of its cotton is „sustainable“ can't be substantiated. C&A does not yet pay a living wage to supply chain workers, but is committed to do so.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	C&A Wear the Change is a label founded by the company itself. The Wear the Change label also relies on BCI cotton and recycled polyester from PET bottles. Even though C&A is a big user of organic cotton the amounts used in its products are not reported clearly. C&A is a Detox Committed brand.


Calzedonia Eco Collection / Intimissimi “Intimissimicares” / Tezenis “Be the Change”	
Introduction	Three brands belonging to the Calzedonia Group have similar self-assessed marketing labels: Calzedonia's "Eco Collection", Intimissimi's "Intimissimicares" and Tezenis' "Be the Change". Calzedonia is unusual as the majority of its products are made by its own production facilities.
Positive	<ul style="list-style-type: none"> The materials included in the labels are backed by independent verification in the case of recycled cotton & polyester, organic cotton, by Bluesign for silk, and manufacturers' labels for Tencel and Q-NOVA. BCI cotton is not included in its list of products with lesser environmental impact. There is a "traceability tool" on the product page of each garment, which Calzedonia states shows the supply chain (as of 2021), however, this doesn't link to factory details for most of the products we checked, but gives the message "we are working on the traceability of our supply chain". It reports on the percentages of low impact materials it uses.
Negative	<ul style="list-style-type: none"> Traceability codes on Eco labelled garments made of Tencel, link only to the Tencel website and not the factory where the garment is made. For Intimissimi the QR code links to Intimissimi's supply chain web page only. Product labels include an icon "sustainable production" however Calzedonia doesn't publish any Restricted Substances Lists or data about the discharge of hazardous chemicals in the wastewater of its factories. Calzedonia is not committed to Detox and is not a member of the ZDHC. "Sustainable" materials are a relatively small part of the whole production, at 16% in 2021, with a target to reach 25% by 2025. Calzedonia reports on the volumes of unprocessed materials and finished materials, but not on the specific material type (eg. "natural" instead of cotton and the different types of cotton (eg. conventional, organic etc.) and "synthetic" instead of nylon, polyester and whether it is recycled). No information on whether it uses recycled polyester from PET plastic bottles. Calzedonian pays "suitable salaries" for workers in its own production plants, but there's no information about supply chain workers.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	Eco Collection, "intimissimicares" and "be the change" are labels founded by the company itself. Although the development of a traceability tool is promising, the Calzedonia Group needs to update its systems of hazardous chemical management by adopting and publishing an MRSL and conducting wastewater testing at its wet process suppliers. Calzedonia Group is not Detox Committed or a member of the ZDHC.


Decathlon Ecodesign	
Introduction	Decathlon proactively communicates its environmental improvements to its customers under its Trademarked label Ecodesign; labelled products reportedly make 10 % of its current turnover.
Positive	<ul style="list-style-type: none"> A short explanation of the main reasons behind the allocation of the Ecodesign label is provided for every product. It does not include the use of BCI cotton. Besides “Ecodesign”, Decathlon has developed an environmental labelling system together with the French Environmental Agency, which ranks products of the same category from A to E (similar to EU ecolabel methodology) on their environmental performance. Decathlon is working on enhanced durability and reparability criteria to decelerate the flow of production, it is providing second life options for products and exploring options to become a rental business model. Decathlon reports on the volumes and percentages of the materials it uses, and provides a breakdown by material type, such as organic, BCI etc.
Negative	<ul style="list-style-type: none"> Information on third party verification of Ecodesign is incomplete; there is no information on certification for its recycled polyester. For cotton, Decathlon refers to several standards but it isn't clear which one(s) it uses. Criteria for getting the Ecodesign label are very broad, and tend to reward single-issue improvements, although some individual criteria are quite demanding such as the requirement for 70 % by weight for the use of recycled polyester. Despite being a leading company in the outdoor market, Decathlon will only ban PFCs in its products from 2024 onwards. Although its Ecodesign label doesn't include the use of BCI cotton, Decathlon still relies on it for its claim that it sells 100% responsible cotton. Decathlon is an active member of ZDHC but it does not publish its suppliers list or link to its suppliers on ZDHC Detox Live map. Decathlon has a poor record on social issues according to the most recent Fashion Revolution Transparency index.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	Ecodesign is a label founded by the company itself. The term “Ecodesign” is in itself a greenwashing marketing tool, and has been fined by the Dutch regulator. Despite some positive elements, Decathlon has still not phased out the “forever chemicals” PFCs, and is behind other companies in the outdoor sector. Despite many interesting initiatives, Decathlon can't help but paint itself greener than it is.


G-Star Responsible materials	
Introduction	G-Star's “Responsible Materials” appears to be a product label. It represents an in-house environmental ranking of the fibres to inform webshop customers.
Positive	<ul style="list-style-type: none"> G-Star rules out the use of BCI cotton in its preferred choices in its Responsible Materials ranking, although it still considers it better than conventional cotton, and largely relies on it as a transitional material. Recycled fibre content (cotton, wool and synthetics) is certified according to RCS or GRS, and organic cotton according to OCS. As a Detox-committed brand, G-Star publishes its suppliers list with 42 of them identifiable on ZDHC's Detox Live map.
Negative	<ul style="list-style-type: none"> The ranking behind “responsible materials” relies on the Higg Materials Sustainability Index (Higg MSI) which ranks recycled polyester as having less environmental impact than organic cotton. G-star's strategic objectives for 2025–2030 mixes recycled, organic, natural and cellulose-derived fibres together, without a clear breakdown between these materials. Therefore its objectives are likely to encourage the growing use of recycled polyester and viscose rather than organic cotton. A garment made of very complex blends of fibres (polycotton with polyester and viscose) making it impossible to recycle will still appear as a greener choice to customers. The sourcing of recycled polyester is not discussed either, so no useful information is provided to consumers to help close the loop. There is no indication of deceleration of production cycles. Supply chain workers are not yet paid a living wage, but G-Star is committed to work with its suppliers on this.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	It's unclear if “responsible materials” is a trademarked brand of the company. Despite some positive elements (such as not including BCI cotton) it still has potential to mislead the customer. G-Star is a Detox Committed brand.


H&M Conscious Choice	
Introduction	With the Conscious or Conscious Choice label, H&M identifies products that, according to the company, meet higher environmental standards than other products in the range. In September 2022 H&M committed to remove these labels after Dutch regulator ACM found that they were used without explanation or a description of the sustainability benefits.
Positive	<ul style="list-style-type: none"> H&M has removed Conscious labelling of products from its online web stores. There are other signs that H&M is rethinking its approach, with a goal to design all products for circularity by 2025, including design for durability, using the Circulator, a comprehensive tool developed with the Ellen McArthur Foundation. It has started to provide supply chain transparency on each product page, although this is not yet available for most products.
Negative	<ul style="list-style-type: none"> Garments with Conscious labels can still be bought from physical stores, however H&M no longer has information on its website to describe its criteria. Materials that “fall into the higher categories” need third party verification, but of the 100 percent “sustainable” cotton which H&M sells, more than 70 per cent is only certified according to the weak BCI standard. H&M uses polyester made from PET bottles, but is transitioning to use textile to textile recycled polyester. H&M discusses microfibres without highlighting the non-biodegradability of plastic microfibres compared to other fibres. It has no reduction targets for polyester and other synthetics. Although H&M has a target for recycling, it has no corresponding target to increase durability. H&M refers to the need to reimagine growth and innovate new business models, but so far there is no indication of deceleration of production cycles for its mass-produced goods. Supply chain workers are not yet paid a living wage, but H&M is committed to work with its suppliers on this. H&M used a tool for assessing materials on its website (the Higg MSI Index) which has recently been paused following the crackdown on greenwashing by the Dutch authorities: H&M was one of the brands that used its flawed methodology to make unsubstantiated claims. H&M still mentions the Higg MSI as one of the tools it uses for material categorisation.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	H&M Conscious is a label founded by the company itself. As well as being fined for greenwashing by the Dutch regulator, in 2022, a class action lawsuit was filed against H&M in the US for making false claims about environmental impacts on some garments.

Mango Committed	
Introduction	With the Committed label, Mango identifies products that, according to the company, meet higher environmental standards than other products in the range.
Positive	<ul style="list-style-type: none"> Mango reports on the total volume of materials it uses and the percentage of material categories, but does not report separately on volumes of material types such as organic cotton, recycled polyester etc.
Negative	<ul style="list-style-type: none"> Current details about Committed products, their criteria and status are not included on Mango's sustainability pages. There are details in its 2021 Sustainability Report but this is only available in Spanish. Mango's goal for its Committed collection was that “by 2022, 100% of our garments will have sustainable properties”. In 2021 73% of items were Committed. A product only needs to contain 30% of more sustainable fibres, or be made using more sustainable production processes, to be labelled Committed. Mango claims that 91 % of its cotton was sustainable in 2021, but this includes the unreliable BCI cotton. 50 % of the fibres it uses are synthetic, of which 14% are recycled plastic fibres, likely to be made from plastic bottle waste and not textiles; there is no reduction target for plastic fibres. Mango has plans to increase circularity such as mono-material/ recyclable garments but there is no evidence that the Committed label reflects this. Although Mango publishes a Suppliers List, transparency in the supply chain is not apparent for consumers. Mango uses a tool for assessing materials (the Higg MSI Index) which has recently been paused following a crackdown on greenwashing by authorities on brands that used its flawed methodology to make unsubstantiated claims. No specifications on longevity or deceleration of production cycles. No evidence that the label guarantees a living wage.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	Mango Committed is a label founded by the company itself. Garments labelled Committed can no longer be found in its online web stores but can still be bought from physical stores.

Peek & Cloppenburg We Care Together	
Introduction	At Peek & Cloppenburg, “We Care Together” identifies products made by other brands that are said to have recycled or organic natural fibre content or have been produced under better working conditions.
Positive	<ul style="list-style-type: none"> Garments labelled “We Care Together” are required to be tested for hazardous chemicals according to OEKO-TEX Standard 100, although certification details are not provided for individual products sold on the website.
Negative	<ul style="list-style-type: none"> Other criteria for “We Care Together” are Recycled, Organic and Responsible. Responsible is not clearly defined and there is no information about verification for products sold on the website. Hardly any information available online on measurable targets. No details of independent controls for products sold on the website, apart from OEKO-TEX Standard 100. Alleged use of recycled materials, but no information on quantities or associated certificates on the website or connected to the product. Alleged use of organic materials, but no information on associated certificates on the website or connected to the product. No specifications on longevity or deceleration of production cycles. A founding member of amfori BSCI social standard and claims to pay suppliers fair prices and reject dumping wages, but there is no evidence that the label guarantees a living wage.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	We Care Together is a label founded by the company itself. The company offers alteration services for longer wear in many branches. Peek & Cloppenburg is not a Detox Committed company or a member of the ZDHC.

Primark Cares	
Introduction	Confusingly, Primark Cares is the name for both Primark's sustainability programme and the label, where Primark identifies products claimed to meet higher environmental standards than its other products.
Positive	<ul style="list-style-type: none"> One Primark Cares collection is a partnership for recycled coloured cotton which avoids the need for re-dyeing and the further use of water and chemicals. However, the fibres are then blended with polyester, undermining this achievement and the future recyclability of the material.
Negative	<ul style="list-style-type: none"> Primark claims that 45% of its products are labelled Primark Cares, which is focused on more sustainable fibres (sustainable cotton, recycled synthetics and cellulose fibres sourced from responsibly-managed forests). However, the specifications for minimum content are not public so there's no way of knowing what proportion of “sustainable” fibres Primark accepts. Primark Cares cotton includes recycled cotton, organic cotton and Primark's own Sustainable Cotton Programme (PSCP) which probably makes up most of it (data is not reported). This PSCP provides traceability, verification and engagement with farmers to help them reduce fertilisers and pesticides; however it is not organic and Primark does not yet report on the environmental benefits of its programme. Primark admits it is still working to provide living wages to workers in its supply chain. Primark's lists suppliers on an interactive map which provides names and addresses claiming to cover 94% of suppliers, but these are only primary suppliers, and the most environmentally sensitive facilities where chemicals are involved are not included. Supply chain workers are not yet paid a living wage, but Primark is committed to work with its suppliers on this. Although Primark has developed a few projects on increasing the recyclability and longevity of garments, none are of a significant scale.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	Primark Cares is a label founded by the company itself. It has the opportunity to avoid the problems of Better Cotton if it can develop its own system for cotton sourcing towards the best practice.

Tesco F&F Made Mindfully	
Introduction	Made Mindfully is Tesco F&F's sustainability label, which shows that "the way in which the materials we use in our products have been produced, grown or made has a more positive impact on the environment than their conventional alternative."
Positive	<ul style="list-style-type: none"> • A detailed list of suppliers, including wet process factories and suppliers of cellulose fabric. • Reports on the percentage of its products that Made Mindfully represents, which is 50%. • Has clear guidelines on the specific language used for claims made for the Made Mindfully label – eg. the label for use of cellulose fibres specifies that this is due to 50 % less water use.
Negative	<ul style="list-style-type: none"> • The cotton used in Made Mindfully products is BCI cotton and organic – most of F&F's cotton is BCI. • The recycled polyester it uses is made from recycled PET bottles from the food industry. • No information on the volumes and percentages of the materials used, according to material type. • Signage in stores can be confusing – eg. a general statement next to a display of clothing "Made Mindfully – our cotton is 100% organic" probably refers to the display, but could also be understood as referring to all Made Mindfully products. • Supply chain workers are not yet paid a living wage, but Tesco F&F is committed to work with its suppliers on this.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	Tesco F&F is Detox Committed, it is engaged with the ZDHC and publishes regular update and wastewater data of its suppliers in China. Despite careful language, its communication around Made Mindfully could be confusing to consumers.

Zara Join Life	
Introduction	Join Life is Zara's sustainability logo, mainly focussing on material composition. Zara (Inditex) informs us that it plans to stop using the label as it exceeded its target for 50 % of products to carry the label by 2022, but it is currently still available in stores.
Positive	<ul style="list-style-type: none"> • Zara's Join Life Re-Made label tags garments which are 100 % made of faulty items, which is a good step to prevent the destruction of valuable material. However, we could only find one example of such an article from 2020. • 61 % of Zara's collection was covered by the Join Life label in 2022. • Join Life products and supply chain have third party verification. • Zara reports on the volumes of materials, but does not report the amounts of organic, recycled and BCI cotton separately; BCI cotton probably makes up the biggest portion of this. Zara's goal is for 100 % of its cotton to be "sustainable".
Negative	<ul style="list-style-type: none"> • Join Life only allows products from primary suppliers with high-ranking social and environmental audits; yet the criteria become more permissive further down the supply chain and as it no longer publishes its suppliers list, Zara makes this impossible to check. • Many different versions of the Join Life label make it confusing for consumers; eg. Join Life Care for Fibres focuses on more sustainable materials such as recycled synthetic fibres and organic fibres, while Join Life Care for Water/Care for Planet allows discredited BCI-certified cotton under water consumption and energy criteria (but not under sustainable material criteria). • The specifications on organic content for organic cotton are also poor, at only 50 % or more. • Unrecyclable mixes of synthetic fibres and BCI cotton are allowed – although Zara is working on new technology to recycle mixed materials. • No specific criteria or message on durability, although Zara has a low surplus level of 0.5 % due to its business model. • Supply chain workers are not yet paid a living wage, but Inditex is committed to work with its suppliers on this.
Logo	
Conclusion/evaluation	Red – greenwash danger zone
Other information	Zara Join Life is a label founded by the company itself. While it has an extensive and detailed programme, it seems to be losing focus on the basics, such as reporting separately on volumes of material types and publishing its suppliers' list, as it did in the past.

Further notes on ranking of fashion brands' matrix

The matrix assessed the product label, as well as the brands' overall practices, which are relevant to the self-assessed marketing label.

Heading in the matrix	Evaluation criteria for   
Reports on the % of its products represented by label	Is the percentage represented by the label relative to the overall volume of the brand's products reported by the brand?
Clear and accessible specification of what qualifies for the label	Is there information in one place that describes what is included in the label, such as: <ul style="list-style-type: none"> • Types of materials and the minimum %age content to qualify for the label • Processing such as less water or energy use • Social standards in the supply chain
Label is backed by third party verification	 all materials are backed by third party verification.  not all materials are backed by third party verification, eg. BCI or own-brand initiatives are included, or it is unclear.  no evidence of any backing by third parties.
Avoids recycled PE from PET bottle waste as a „sustainable“ material for its label	Does the label avoid the use of recycled polyester and is this sourced from PET bottle waste or other plastic PET waste (eg. ocean plastics)? If recycled polyester is used but information isn't provided about the source, it is assumed that this includes r-PET from PET bottle waste as this makes up the majority of r-PET.
Avoids BCI cotton as a „sustainable material“ for its label	The sourcing of BCI cotton for its label is not included in the criteria for the label, or the brand mentions that it specifically excludes the use of BCI cotton for the label (even if BCI cotton is used for other products not covered by the label).
Avoids relying on the Higg MSI Index for materials in its label	The brand does not refer to the Higg MSI Index as a tool used as external material benchmarks for the assessment of materials for its label, whether on its own or among other metrics.
Disclosure of material volumes, percentages, and a breakdown of material types	 the brand discloses of material volumes by material category, including a breakdown of material type (eg. conventional cotton, organic cotton, polyester, recycled polyester etc.).  the brand discloses material volumes but there is no breakdown of material type OR disclosure of material percentages including a breakdown of material type.  the brand discloses material percentages with no breakdown of material type, or no disclosure at all.
Slowing the flow commitment and initiatives	The brand has an extensive and in-depth commitment to slowing the flow, including an acknowledgment and commitment to change the linear business model of fashion. There is evidence that the brand is already implementing this through several initiatives. There are targets and timelines connected to slowing the flow.
A living wage for workers in supply chains	Does the label guarantee a living wage for supply chain workers? If not, does the brand acknowledge that this is a problem that needs to be addressed and is it taking steps, either directly or as part of an industry initiative such as ACT or the Ethical Trading Initiative to work with its suppliers on securing a living wage for all workers?
Transparent suppliers list	Does the brand publish a list of its suppliers? Does the list include wet process suppliers where the majority of environmental impacts take place?
Supply chain traceability on product label +/- webshop	Does the product label include information/or a link that allows the customer to trace the supply chain for the product, going back to the original sourcing of the materials (eg. farmers) and including the wet processing manufacturer, with links to environmental data including test results of wastewater for hazardous chemicals? Is this traceability enabled for all products covered by the label, or are any of the elements above still a “work in progress”?
Publication of Detox wastewater data	Does the brand publish the wastewater data of its wet process suppliers, either on its own website, on the IPE Green Supply Chain map, or link its brand name to wastewater data ratings on the ZDHC's Detox Live map?
Has a best practice chemicals list for supply chain (MRSL)	Does the brand have its own best practice Manufacturing Restricted Substances List (MRSL) or use another best practice list such as the OEKO-TEX STeP/DETOX TO ZERO Chemicals List or the ZDHC's MRSL?
Avoids crossing any red line, or any other outstanding concern	Examples of red lines include: The use of toxic, persistent or bioaccumulative chemicals in products and in supply chains – especially the “forever chemicals” PFCs. The use of non-biodegradable fossil fuel based materials which shed microplastic fibres, including recycled polyester from PET bottle waste. The destruction of important ecosystems and habitats such as old growth forests.