GREENPEACE

Detox Retailer Check 2017

Campaign and Criteria explained

Detox My Fashion - State of Play

Greenpeace launched its “Detox My Fashion” campaign in July 2011 to address the problem of continued water pollution by persistent hazardous chemicals. The campaign asked the textile industry to urgently take responsibility for its contribution to the problem, past and present. Hazardous chemicals – including the 11 priority groups identified by Greenpeace[1] - are commonly used for the manufacture of clothes by many well-known brands.

Since the start of the “Detox My Fashion” campaign, we have secured global commitments to Detox from 79 international brands, retailers and suppliers. The campaign has also had political impacts, triggering policy changes such as China's enforcement of stricter wastewater standards or the EU ban on the import of textiles containing the hazardous chemicals nonylphenol ethoxylates (NPEs) that should enter into force in 2020.

Greenpeace is now broadening the perspective of the “Detox My Fashion” campaign. Which strategies does the textile industry need to adopt to be ‘fit for future’? What does a systemic change from the current fast fashion model - where high volumes of clothes are made, used and thrown away in a linear fashion - towards a new business model which follows a circular approach and reduces the speed of consumption look like?

Detox Retailer Check

This is the first detailed assessment[2] of retailers with headquarters based in Germany which have agreed a Detox Commitment with Greenpeace. In this edition, two pillars are evaluated. As Detox initially focused on the **elimination of hazardous chemicals**, firstly we assess how far the companies have progressed on the road to achieve the 2020 goal.

The second part focusses on the strategy and activities relevant for **slowing and closing the loop**. Retailers - as well as the overall textile industry - need to re-think current practices and transform their respective business models. This re-thinking needs to take all phases of a product’s life into account - from design to disposal - and requires companies taking responsibility

[1] The 11 priority hazardous chemical groups are: 1. Alkylphenols, 2. Phthalates, 3.Brominated and chlorinated flame retardants, 4. Azo dyes, 5. Organotin compounds, 6. Perfluorinated chemicals, 7. Chlorobenzenes, 8. Chlorinated solvents, 9. Chlorophenols, 10. Short chain chlorinated paraffins, 11. Heavy metals such as cadmium, lead, mercury and chromium (VI).

[2] End of 2015, a first check of the respective roadmaps of those retailers who signed a commitment has already been published.

for their products beyond the counter, i.e. to be ready for **extended producer responsibility (EPR)**.

1. Detox - Elimination of hazardous chemicals

For the assessment on how retailers are progressing in **eliminating hazardous chemicals** from their supply chains by 2020, three categories are assessed, similar to the Detox (fashion) Catwalk 2016[3]. Retailers are evaluated from the point of view of their Detox 2020 hazardous chemical elimination deadline, thinking backwards to assess if they have the necessary tools to be fit for their 2020 elimination goal.

Criteria for chemical management

1.1 Detox 2020 Plan

Detox 2020 Plan focusses on a company's chemicals management system, specifically its **Manufacturing Restricted Substances List (MRSL)** and the methodology needed to establish this list, which is needed to identify hazardous chemicals used in manufacturing by suppliers and set priorities for elimination (bans) and phaseouts (with timelines).

An MRSL, together with a Product Restricted Substances List (PRSL), are the main **leverage tools for chemicals management** across the whole supply chain, from the first level of the supply chain (tier 1) through to chemical suppliers.

Criteria
Each retailer should have **its own[4] transparent list**,

- Implementing proactive **preventive and precautionary action**: this recognises that there are no safe levels of hazardous chemical releases. The company has a better leverage on hazards elimination by commercially binding the suppliers to immediate bans and phase-out plans of hazardous chemicals listed on the MRSL.
- **Clean factory** approach: it's not only about improving a brand's own production lines but chemicals management for the whole factory, with the risk otherwise that different standards of chemicals management coexist in the supplier's facility resulting in potential sources of contamination, the impossibility of monitoring progress, and on-going reputational risks.
- Detox "Zero" means **"not detectable by current best available technology"**: ie. investigating the lowest technically (as opposed to commercially) available **detection limits (DLs)**, requiring labs to use them and regularly updating them.

[3] See http://www.greenpeace.org/international/en/campaigns/detox/fashion/detox-catwalk/
[4] Retailers have to take individual action to ensure that the MRSL set up is at a credible level, in line with their detox commitment

The List should be derived using a credible and transparent hazard screening methodology[5] based on nine principles listed in Annex 1 of the Detox Commitment.

1.2 PFC Elimination

PFCs elimination currently serves as one of the progress indicators for the implementation of the 2020 goal. It assesses the progress made towards the commitment to **eliminate any use and discharge of hazardous per/poly fluorinated chemicals (PFCs)**[6], and the publication of **case studies** showing how this has been achieved.

2020 fit PFC elimination criteria

To be fit for the 2020 goal, companies need to have:

- Achieved the elimination of PFCs according to their Detox Commitment, with details reported in their progress report
- Published at least one Case Study showing the substitution of PFCs; this should include hazard screening data and information on uses (on subsport.org and/or on own website)

To achieve 'best practice' companies should provide details in their progress report on the following:

- The product categories which are included;
- When they are due on the shelf;
- The performance assessments that have been carried out;
- Any sacrifices on functionality that have been made in the process of substituting PFCs.
- If the company has not yet achieved 100% elimination, the progress report needs to include:
- The progress made so far, reported as a percentage of global sales;
- A description and a link to consumer-facing information (in stores or online sales websites) which allows customers to easily choose PFC-free products.

[5] *An example* of best practice is to endorse all hazardous chemicals derived from a GreenScreen full assessment, at least all Benchmark 1/Benchmark 2 - or derived from the GreenScreen List translator, all LT-1 . See GreenScreen® For Safer Chemicals, and http://greenscreenchemicals.org/ and http://www.greenscreenchemicals.org/resources/entry/list-translator

[6] PFCs refer here to per- and polyfluorinated chemicals (also known as per- and polyfluoroalkyl substances, PFASs. Hazardous PFCs includes precursor chemicals such as fluorotelomers and certain polymers that can degrade to form hazardous perfluorinated chemicals (e.g. PFOA). It does not include certain polymeric PFCs that do not release hazardous PFCs throughout their life cycle. See https://www.oecd.org/chemicalsafety/risk-management/Working%20Towards%20a%20Global%20Emission%20Inventory%20of%20PFASS.pdf

1.3 Transparency

Transparency evaluates whether the company has ensured that its suppliers regularly **publish data on the discharge of hazardous chemicals** from their wet processes on the Detox section of the IPE online platform[7] and whether it **discloses its suppliers list** (including second tier where wet processing is likely to take place).

Responsible Detox companies should ensure the publication of precise, relevant, up to date and locally accurate information on the use and discharge of hazardous chemicals from individual facilities in their supply chains, in a form that can be easily accessed by local communities, the general public and public interest organisations, for example via the IPE (Chinese Institute for Public and Environmental Affairs) global online platform[8] as well as the company's own website.

The publication of discharge data also seeks to further engage brands with their suppliers and support moves towards a **clean factory approach**.

2020 fit transparency criteria
To be fit for the 2020 goal, companies need to:

- Publish discharge data from **at least 80% of wet process suppliers** uploaded on IPE regularly (at least annually) and continuously updated, for at least the initial 11 priority hazardous chemical groups
- Disclose their **list of suppliers**, including **at least tier 1&2** wet process suppliers

To make good use of this data, companies need to publish an analysis of trends in the discharge of hazardous chemicals and details of investigations, broken down by country / types of facility / individual facilities.

In addition, companies can provide an activity report on chemical management capacity building and improvement assessment at supplier level.

[7] See: http://wwwen.ipe.org.cn/ (respectively the archived old version at http://wwwold.ipe.org.cn/En/default.aspx)
[8] By publishing chemical discharge data via the IPE disclosure platform, a company's suppliers ensure that the data is credible, that it includes the necessary details to identify the individual facility concerned and that it covers at least the 11 groups of priority hazardous chemicals. Because much of the world's textiles production takes place in China, companies must ensure data from suppliers in China (including Taiwan) is disclosed, followed by other major suppliers in the Global South.

2. Slowing and closing the loop

In order to slow and close the loop, companies need to re-assess their current business model. A shift is necessary from a linear throw-away model delivering fast fashion in high volumes to a slow and circular business model.

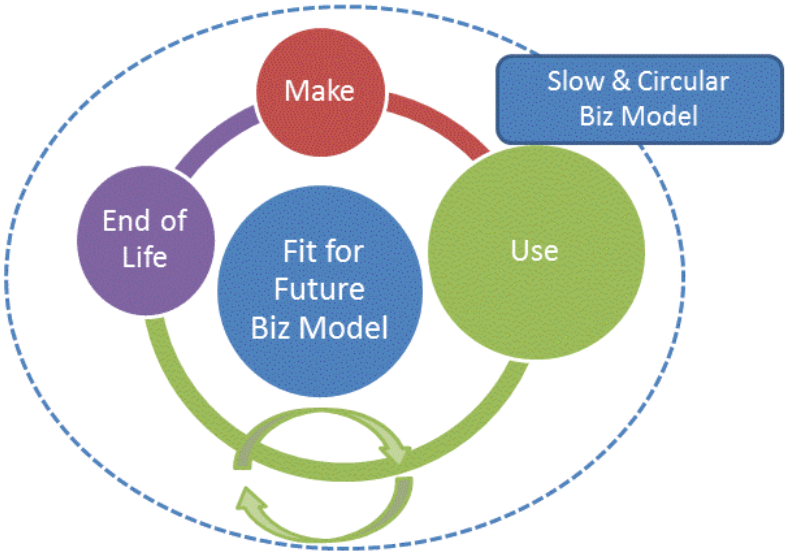
In their Detox Commitments, retailers have recognized that their actions must support slowing and closing the loop via **Extended Producer Responsibility (EPR)** that actively implements responsible production and consumption across all of the apparel and footwear products it orders and/or sells.

A comprehensive approach to Extended Producer Responsibility requires companies to

- Review the **business model** and adapt it to clean, durable, circular products in reduced volumes, i.e. **from linear to slow and circular**
- Take **all lifetime phases** of a product into account
- Work with **transparent supply chains** which eliminate negative environmental and social impacts associated to their specific operations
- Develop and offer **services** for consumers **to maximize the use phase of products**
- Adopt **producer responsibility** for **End of Life** and **recycling**

The following sections present the elements that are essential for any retailer - or fashion brand or other party in the textile industry - to consider when reviewing its current business model (see Figure 1). For all four elements, there is a key guiding question and a list of items that can be considered to give an overview of what the company actually has developed and/or implemented.

Figure 1: Elements of a slow and circular business model



2.1 New business model to slow and close the loop

Fit for Future Business Model	
Key question	What is the company's overarching strategy - including milestones, timelines and current status quo - to slow and close the loop?
Reporting items	● Does the strategy ○ recognise company responsibility for comprehensive 'EPR' ○ Include actions on slowing the loop[9] (including ownership and business strategies) ○ Include actions on closing the loop ○ Include actions on raising global 'sustainable consumption' awareness/reduce consumption of unnecessarily 'disposable' products[10] ● Is there a regular and comprehensive progress report on relevant strategy timelines or milestones

2.2 Production Phase

MAKE - Production Phase: Design, Resources and Manufacture[11]	
Key question	What are the milestones, timelines and current status quo to ensure the company offers long-life textiles which are designed and produced for circularity[12]?
Reporting items	● Transparency of supply chain (suppliers lists)[13] ● Stability of supply chain (long-term commitment to a reduced number of key suppliers)

[9] Examples: Services (rent/repair etc.) for longer ownership strategy or alternative fashion calendar (reduced material flow volumes via reduced number of collections) for business strategy;
[10] Such as consumers call to action "Buy according to need", "Keep your clothes longer", "Shop your wardrobe", (re-)style tips, (re-)organise your closet
[11] In this assessment, the manufacture aspect is in detail covered by the chemicals assessment.
[12] 'Responsibly designed and produced for circularity' includes a comprehensive systemic approach identifying all aspects of capturing the most responsible design, production, product use and closed-loop whole life reuse and recycling, regardless of the application. All aspects of this whole lifecycle are optimized for responsible environmental and socio-economic production value outcomes.
[13] Please note: This aspect is evaluated at the level of chemical criteria (1.1.). It's mentioned here again to show which elements are necessary for a comprehensive approach for the production phase.

	● Design phase ○ Transparency on the company's buying specifications relevant for long-life quality and repairability ○ Transparency on the company's definition and strategy of repairability ○ Transparency on the company's definition for long-life quality ● Resources ○ Transparency of materials[14], including total fibre use, fibre-mixes, secondary fibres used (total volumes) ○ Strategy and targets on materials (volumes) and fibres (quality and longevity or biodegradability)

2.3 Use Phase

USE Phase - Guarantee, Repair, New modes of ownership[15]	
Key question	What are the milestones, timelines and current status quo to maximize the use phase of its products?
Reporting items	**Intrinsic longevity** ● Publication of expected lifespan and guarantee for category of garment ● Long-life "minimum[16]" guarantees on products or parts of products (such as zippers) and proactive/prominent communication on guarantees **Extending the life of products** ● Repair services offered ● Prominent communication on repair services and/or skillshares and/or vouchers to external repair services ● Prominent communication on other life extending services **Business Model** ● 'Slowing' sourcing and marketing strategies - eg rotation/ collections, local sourcing, local market[17] ● Products offered under 'new mode of ownership' for slowing

[14] Including targets and strategies for recyclable material mixes, secondary materials, certified fibers, textiles ready for circularity.
[15] New modes of ownership such as leasing, renting, sharing, repurchasing, second hand, facilitating C2C exchange or equivalent activities that support the reduction of total volumes of clothing accumulated on individual basis and therefore reducing the total volumes of textiles in the loop.
[16] As opposed to purchasable "extension of guarantee"
[17] This also connects to the production phase, with regards to the location of production facilities and the number of production cycles

2.4 Extended Life & Closing the Loop

Producer Responsibility for End of Life (EOL) and Recycle	
Key question	What is the company's overarching strategy - including milestones, timelines and current status quo - to extend the life-time of products beyond the first customers and to ensure high use of products and materials in the form of re-use and recycling?
Reporting items	**Producer responsibility for end of life** ● Country-specific take-back programmes[18] established that ensure effective[19] collection maintaining or upgrading material quality ● Reporting on volumes and material flows from take-back programmes (% reuse in local market, % reuse elsewhere, % upcycling[20], %recycling, %downcycling[21], %disposal) in relation to targets. ● Transparency on use of funds raised from take-back programmes **Recycle** ● Specific recycling targets for technology/materials ● Investments into the development and scaling up of recycling technology **Feedback** ● Conduct product-specific studies on EOL to inform and improve the design/make phases, including the issue of hazardous chemical contamination[22] **Advocacy for systemic change** ● Supporting apparel and textile EPR regulation (that differentiates between reuseable /recyclable and non recyclable materials and design), e.g. by a public statement

[18] Programmes shall ensure that collected articles and material are not being exported to any location where there is no equivalent re-collection and reuse/recycling system in place in order to avoid single re-use and landfill and incineration in, inter-alia, Eastern Europe or Africa.
[19] Effective also means the system chosen should allow transparency and tracking of material flows and enable quality reuse or material loop.
[20] Upcycling increases the value of clothing, makes it special and gives it a new life. A good overview is provided in the book ReFashioned: Cutting-Edge Clothing from Upcycled Materials, 2013 by Sass Brown and Natalie Chanin, http://www.ecofashiontalk.com/
[21] Downcycling like using textiles waste as industry cleaning rags or car insulation.
[22] As long as hazardous chemicals are used in manufacturing and in products these chemicals will also be present at the end-of-life, and will continue to contaminate recyclate. In some cases this can interfere with clean recycling. Efforts need to be made to monitor the levels of hazardous chemicals in end-of-life textiles and consequently to further ensure their use is eliminated at the production stage.