Self regulation: a fashion fairytale

Greenpeace has proved that Detoxing fashion supply chains is a game changer; but without regulation, fashion as usual will continue its destructive impacts on the climate

Part 2: Evaluation of Detox Committed brands, 2021 - the ten-year milestone

GREENPEACE

Image: Textile Composting in Hamburg
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Elimination of hazardous chemicals: wastewater data analysis

Note: All company information is correct as of 10th May 2021. Updates since this date are not included.

A report by Greenpeace Germany

Elimination of hazardous chemicals: wastewater data analysis

1. Issues with data comparability and no public access to standardized data from the Zero Discharges of Hazardous Chemicals Foundation (ZDHC)

Although most brands published an analysis of their wastewater data in their most recent Detox progress reports, overall conclusions and comparisons between brands in terms of how close they are to achieving zero discharge of hazardous chemicals are difficult. This is because brands are testing wastewater in different ways (eg. they use different lists of chemicals, known as Manufacturing Restricted Substances Lists (MRSLs, see Box 1), some including more chemical substances and/or using lower detection limits than others) and they report about it in different ways (eg. some are reporting the percentage of facilities where they did not detect hazardous chemicals, and others the percentage of chemicals tested from their MRSL that were not detected (this is called "MRSL compliance", relating to the particular MRSL being used)).

Box 1: RSLs, MRSLs and the different kinds of MRSLs

RSL. Restricted Substances List. This sets limits for the presence of hazardous chemicals in the final product.

MRSL. A Manufacturing Restricted Substances List (MRSL) is the core element of the Detox roadmap, developed and implemented by all Detox committed brands and companies. It sets a black list of chemicals, starting with the 11 Detox priority hazardous chemical groups (see Box 1). The Detox commitment requires that these are banned at all stages of production, with specific reporting limits for discharges to wastewater, used as target levels. To implement, brands check manufacturing facilities for compliance with the reporting limits, by testing the wastewater before treatment and residual sludge from the wastewater treatment plant.

A MRSL is a binding and evolving document that translates the ambition of a brand's Detox roadmap in terms of its scope, (at least the 11 Detox priority groups, expanding to all textile-related hazardous chemicals) and its limits, that should reflect the lowest technically achievable levels (technical zero).

TO CHECK: Current examples of best practice MRSLs, both for scope and limits, are:

- The ZDHC MRSL (inputs and wastewater guidelines, used by the majority of brands: some brands add other chemicals and chemical groups to this list.
- Individual MRSLs, used by some brands, eg. Inditex, Miroglio, Valentino, as well as the Detox Committed suppliers in Italy CID (Italian Detox Consortium)
- The OEKO-TEX® STeP/DETOX TO ZERO Chemicals List, used by some German retailers (eg. Kaufland) and also the Detox Committed supplier Utenos, a manufacturer of textile products complying with Greenpeace's Standard for its own textiles procurement.

ZDHC, whose signatory brands currently include 20 Detox brands and 13 other brands,[1] set a common MRSL in 2015 (version 1.1) that is due to be revised soon. Wastewater guidelines were added in 2017 which set limits for MRSL chemicals in wastewater (limits in sludge are expected in the next update).

Detox Live, ZDHC's platform for brands and suppliers to add their wastewater data, currently includes data from 44 brands, representing 5557 suppliers around the world.

Box 2: The Detox Commitment

Brands signing the Greenpeace Detox Commitment implement preventive and precautionary action on chemicals, by setting goals to eliminate hazardous chemicals in manufacturing.

The key elements of the Detox Commitment are:

- Chemicals management - specifically setting a Manufacturing Restricted Substances List, or M-RSL, which initially focussed on 11 priority hazardous chemical groups (see table 1) and testing for them in wastewater discharges and sludge.
- Transparency - of the wastewater and sludge testing results to be published by the supplier on an online platform, and the publication of suppliers lists to include wet processing (washing and dyeing) suppliers (Tier 2/3).
- Substitution and elimination - with a particular focus on alkylphenol ethoxylates (APEs), per- and polyfluorinated chemicals PFCs) and phthalates * hazards to environment and human health include:

The 11 priority hazardous chemical groups and examples of uses and hazards

CHEMICAL VILLAINS - the 11 priority hazardous chemical groups: 11 [2]	Examples of uses /functions [3]	Examples of hazards to environment and human health (see note*) and relevant regulation
1. Alkylphenols/alkylphenol ethoxylates (APs/APEs), including nonylphenols/ nonylphenolethoxylates (NPs/NPEs)	Detergents and auxiliaries	APs: toxic to aquatic life, persistence, bioaccumulation, endocrine disruptors. Heavily regulated in the EU.
2. Phthalates	Softeners in plastic coatings	Some phthalates are classed as reprotoxic, others are known for other types of toxicity. Under EU REACH legislation many phthalates are listed as Substance of Very High Concern. [4]
3. Brominated and chlorinated flame retardants (BFRs, CFRs)	Fire retardant textiles	Many are persistent and bioaccumulative. Some PBDEs are endocrine disruptors and are banned under EU law.
4. Azo dyes with cleavable carcinogenic amines	Dyes and colourants	Release chemicals known as aromatic amines, which are carcinogenic for these azo dyes. Banned by the EU in textiles that come into contact with human skin.
5. Organotin compounds	Antibacterial and anti-mould agents;	Some organotins are persistent, bioaccumulative, and can affect immune and reproductive systems.
6. Per- and polyfluorinated chemicals (PFCs)	Water-, oil-, stain- resistant coatings	Many PFCs are persistent and bioaccumulative. Some can affect the liver or act as endocrine disruptors, altering levels of growth and reproductive hormones.
7. Chlorobenzenes	Carriers	Persistent, some are bioaccumulative, commonly affect the liver, thyroid and central nervous system; HCB is an endocrine disruptor.
8. Chlorinated solvents	Carriers/solvents	Effects vary from chemical to chemical: potential health effects include central nervous system, reproductive, liver, and kidney toxicity, and carcinogenicity.[5] Regulations include a severe restriction on the use of TCE in the EU in both products and fabric cleaning
9. Chlorophenols	Antibacterial and anti-mould agents	PCP (penta chlorophenol) is highly toxic to humans and can affect many organs in the body. It is highly toxic to aquatic organisms. The EU banned production of PCP-containing products in 1991.
10. Short chain chlorinated paraffins	Flame retardant & finishing agent	Highly toxic to aquatic organisms, persistent, bioaccumulative. Their use has been restricted in some applications in the EU since 2004.
11. Heavy metals: cadmium, lead, mercury and chromium (VI).	Dyes and colourants; additives in some plastic coatings	Some can bioaccumulate in the body over time and are highly toxic, with irreversible effects including damage to the nervous system (lead and mercury) or the kidneys (cadmium). Cadmium is also known to cause cancer.

- hazards to environment and human health include: persistence (they do not readily break down in the environment); bioaccumulation (they can accumulate in organisms, and even increase in concentration as they work their way up a food chain); and toxicity. Some types of toxicity make it difficult to define 'safe' levels for substances, even at low doses, for example , substances may be: carcinogenic (causing cancer), mutagenic (able to alter genes) and/or reprotoxic (harmful to reproduction); or endocrine disruptors (interfering with hormone systems).

These different ways of testing and reporting raise several issues. Brands which do a better job because they are using more ambitious MRSLs may appear to perform worse, but only because they are looking more carefully at their activities. Also, brands that are reporting on the number of facilities where they did not detect hazardous chemicals are consistently scoring less well than those reporting "MRSL compliance" (the percentage of chemicals that were not detected during testing: see Part 2 for more details). This represents a major limitation in holding brands to account, and for the public to be able to distinguish between them.

The ZDHC holds the key to solving these issues. One of the main reasons why the ZDHC was founded was to standardize methods and requirements for suppliers and to make brands' performance more comparable. There has been a clear trend over the last couple of years towards this. For example, many brands that previously used their individual MRSL have now adopted the ZDHC one from 2020 (regrettably, some of them giving up on their more ambitious requirements). Unfortunately, this standardized and comparable data on the ZDHC platform is only accessible for brands and suppliers and not to the public or NGOs. This makes an external and independent analysis impossible.

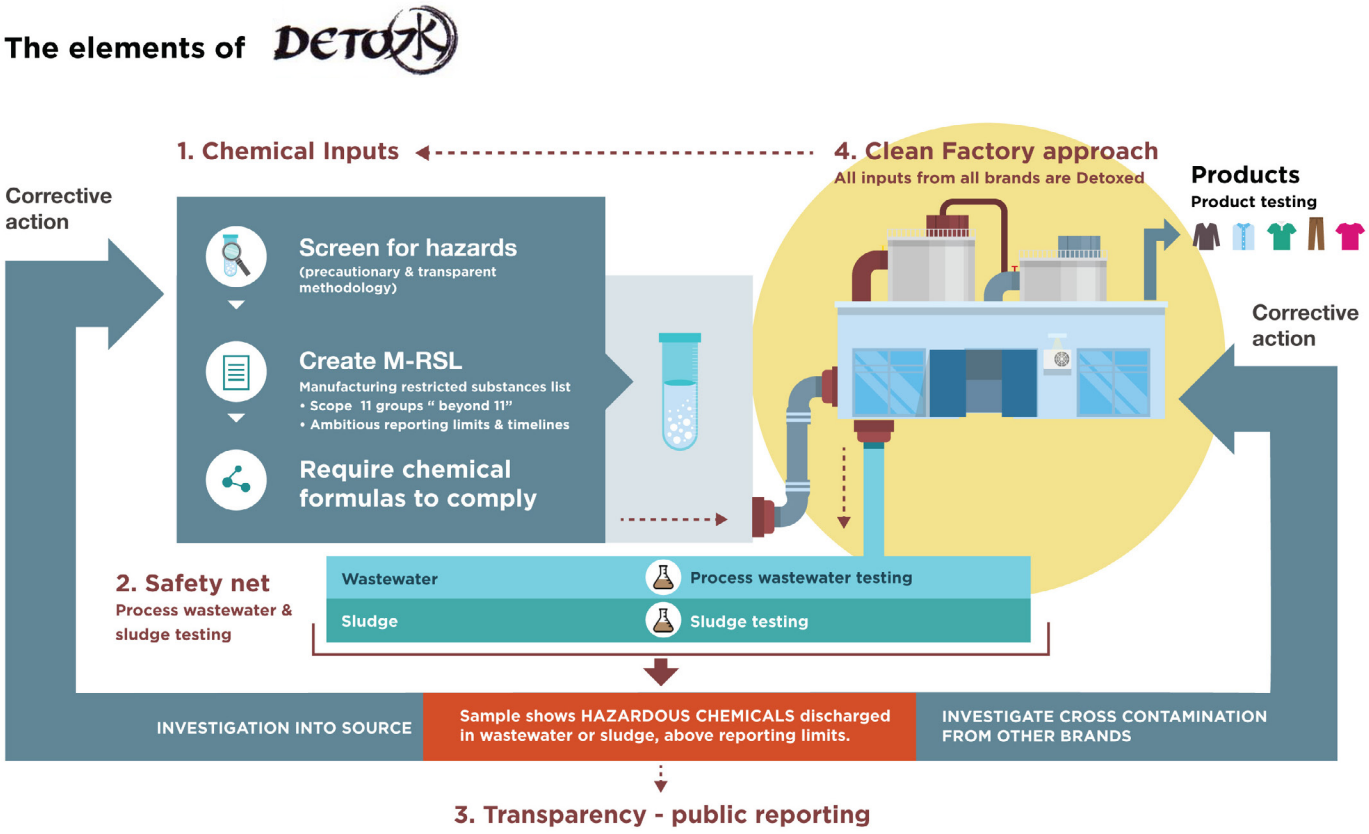


Figure 1: The Elements of Detox (diagram from Destination Zero)

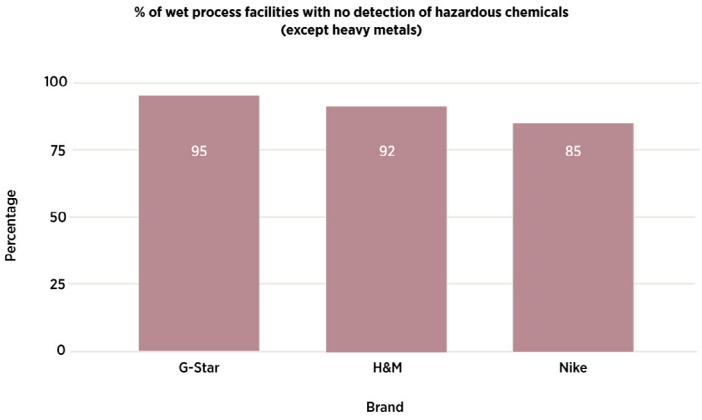
2. Trend towards zero discharge emerging, but more work needed

Due to the issues explained above, any non-comparable, incomprehensible or contradictory wastewater data[6] from the brands' latest Detox reports was not used in this analysis but just included in the overview Table 1 below. However, even with the limited comparable data that is publicly accessible, there are some general patterns emerging.

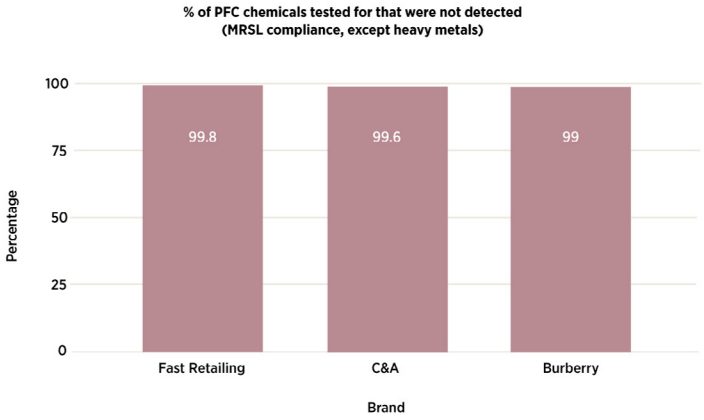
2.1 Elimination of all hazardous chemicals:

Only six brands reported on the overall percentage of all chemicals that were not detected for all of the hazardous chemical groups that they tested for. It's most important for brands to report the percentage for each chemical. The remaining brands only reported the percentage of non-detected chemicals for each chemical group.

As Graphs 1 and 2 below show, those that reported "MRSL compliance" all had scores over 99%, whereas those reporting the percentage of facilities where they did not detect any hazardous chemicals had scores between 85% and 95%. All six brands were using the ZDHC MRSL to test the wastewater.



Graph 1: Percentage of wet process facilities with no detection of hazardous chemicals (except heavy metals) per brand

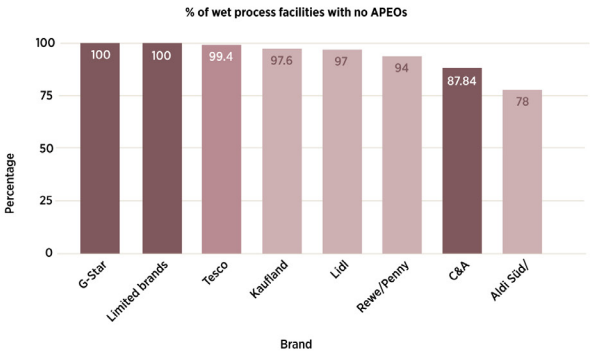


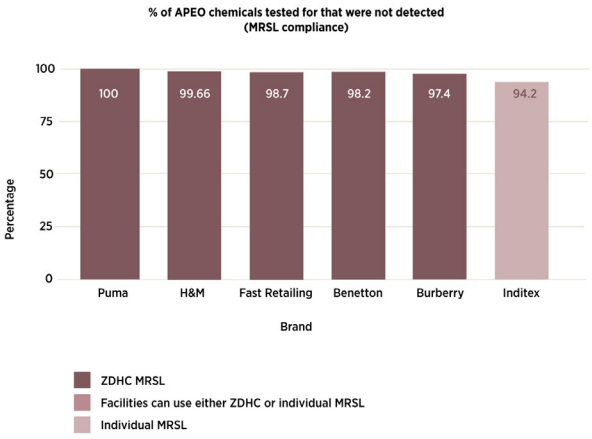
Graph 2: Percentage of chemicals tested for that were not detected (MRSL compliance, except heavy metals) per brand.

2.2 Elimination of priority chemical groups:

APEOs:

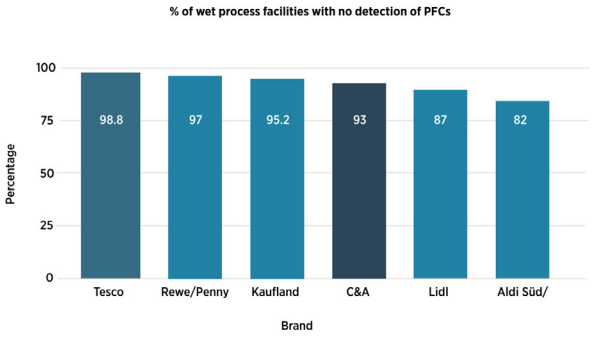
For APEOs, wastewater data from 14 brands could be included in the analysis (see graphs 3 and 4). Again, those brands who reported "MRSL compliance" generally had better scores than those reporting the percentage of facilities where APEOs were not detected (see 2.1 above). The two graphs below also show that brands such as Inditex and the German retailers, which use more ambitious individual MRSLs (including more substances and/or lower detection limits, shown in paler blue) and are therefore looking more carefully at what hazardous chemicals can be found in their suppliers' wastewater, tend to have lower scores compared to those using the ZDHC MRSL. Tesco, who is allowing its wet processing facilities to use both its individual MRSL or the ZDHC MRSL for wastewater testing, scores in the middle.

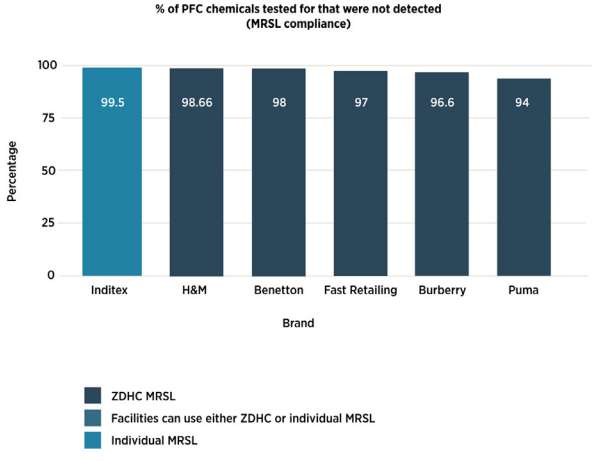




PFCs:

For PFCs, wastewater data from 12 brands was included in the analysis (see graphs 5 and 6 below). The pattern emerging is similar to that for APEOs, except that Inditex with its own more ambitious MRSL scores better than those brands using the ZDHC MRSL. This could be due to the fact that Inditex's MRSL includes many more PFC substances than the ZDHC MRSL, but the brand detected similar amounts of substances as those using the ZDHC MRSL. This gives Inditex a better score for "MRSL compliance" and indicates that this needs to be taken account of when reporting and making comparisons.



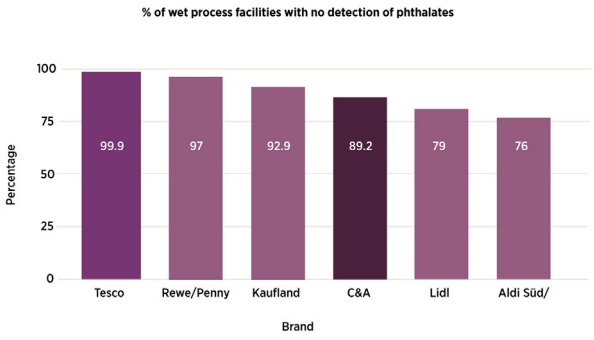


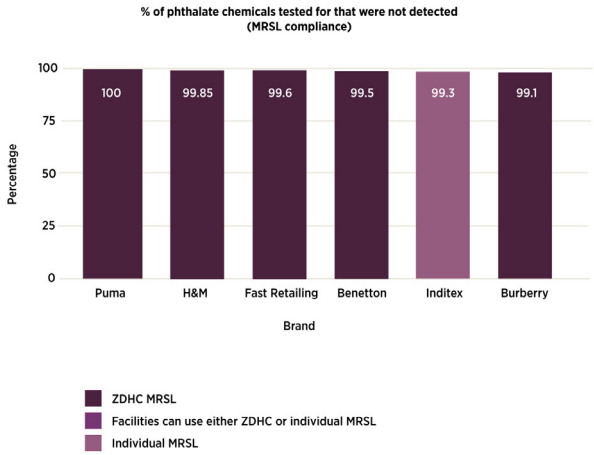
Top to bottom
Graph 3: Percentage of wet process facilities with no detection of APEOs per brand
Graph 4: Percentage of APEO chemicals tested for that were not detected (MRSL compliance) by brands
Graph 5: Percentage of wet process facilities with no detection of PFCs per brand
Graph 6: Percentage of PFC chemicals tested for that were not detected (MRSL compliance) by brands

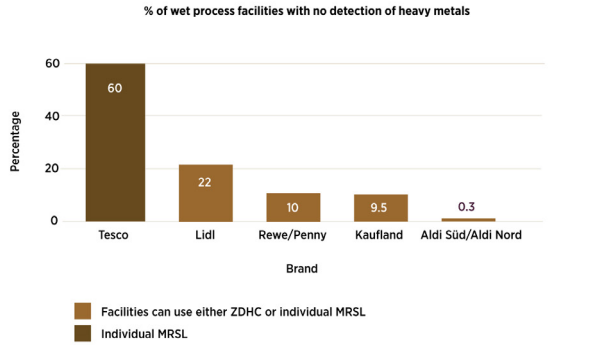
Phthalates:
For phthalates, wastewater data from 12 brands was included in the analysis (see graphs 7 and 8 below). General patterns are again similar to those for APEOs, and PFCs, with the brands reporting "MRSL compliance" all having nearly identical scores, while there are clearly differences between those brands that report the percentage of facilities where phthalates were not detected. This again indicates that reporting the percentage of facilities with no detections is more meaningful than reporting on MRSL compliance.

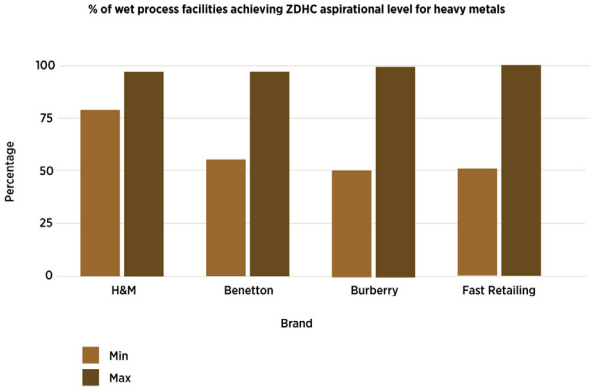
Heavy metals:
For heavy metals, wastewater data from only 9 brands was included in the analysis (see graphs 9 and 10 below). Many ZDHC brands (see box) do not report in exact numbers but give the range of levels achieved by their suppliers (the levels are foundational, progressive, and aspirational). Nevertheless, the data clearly shows that heavy metals are one of the most challenging groups to eliminate. To be able to address this problem, it is key that brands report about heavy metals in the same detailed and transparent way that they do for the other chemical groups, rather than just using levels that are less informative.

The reason why Tesco appears to be doing much better than the German retailers here, seems to be again that it allows its wet processing facilities to use both its individual MRSL or the ZDHC MRSL for wastewater testing, whereas the German retailers are exclusively using MRSLs that are more ambitious than the ZDHC one.









Top to bottom
Graph 7: Percentage of wet process facilities with no detection of phthalates per brand
Graph 8: Percentage of phthalate chemicals tested for that were not detected (MRSL compliance) by brands
Graph 9: Percentage of wet process facilities with no detection of heavy metals per brand
Graph 10: Percentage of wet process facilities achieving ZDHC aspirational level for heavy metals

2.3 Conclusion

To conclude, the wastewater data from this research indicates that the trend towards zero discharge of hazardous chemicals continues, and many Detox brands have managed to eliminate hazardous chemicals from over 90% of their facilities, including priority chemical groups such as APEOs, PFCs, and phthalates. Heavy metals are the most challenging group which continues to be detected at many facilities.

In addition, the wastewater data presented here also clearly reveals issues arising from the fact that brands test and report wastewater data in different ways: those who are doing a better job at testing and reporting appear to be worse, only because they are looking more carefully at the problem and reporting about it in a more useful way.

Also due to issues with comparability, only the most recent data available were used in this research and trends over the years could not be analyzed in detail. Many brands, however, included data that clearly shows progress over several years in their reports (see Graph 11 for example[7]). The ultimate goal of toxic free production will only be achieved through the continuous hard work of the entire textile industry.

To enable a more in-depth analysis, to compare between brands and hold them to account and to implement the Right to Know, it is crucial that the ZDHC makes its standardized data publicly accessible.

Graph 11: Rewe: compliance with limit values for the eleven priority chemical groups as % of wet process facilities between 2015 and 2019 (year on year)

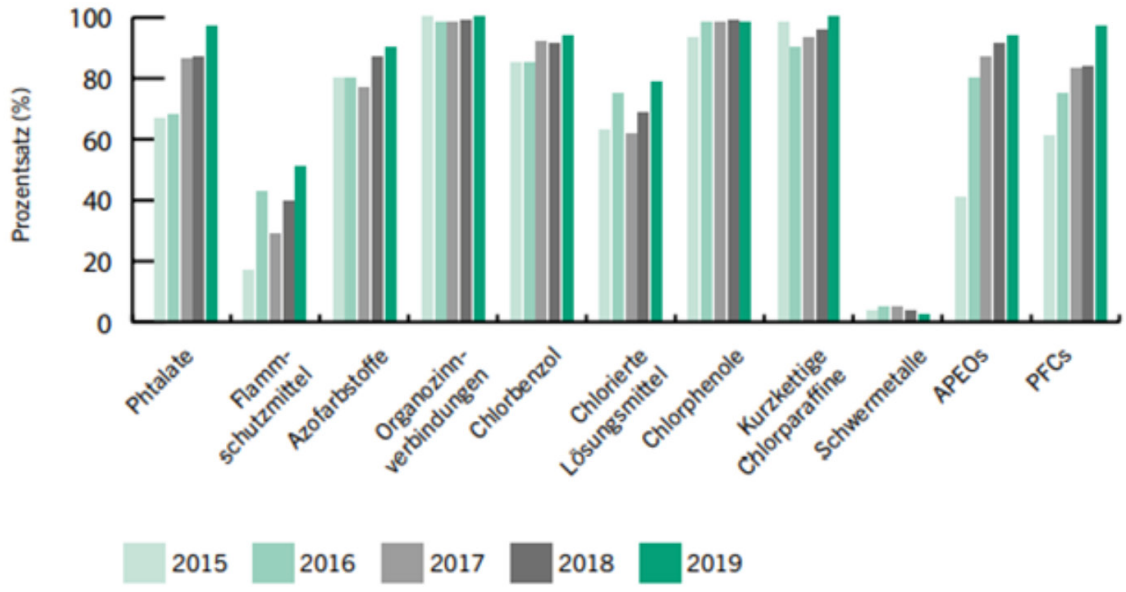


Abbildung 5: Einhaltung der Grenzwerte für die elf prioritären Chemikaliengruppen in % der Nassproduktionsstätten 2019 (Jahresvergleich)

Chemicals, left to right
Phthalates, Flame Retardants, Azo dyes, Organotins, Chlorobenzenes, Chlorinated Solvents, Chlorophenols, Chlorinated Paraffins, Heavy Metals, Alkylphenol Ethoxylates, PFCs

Table 1: Overview of the implementation of Detox Commitments

Brand / company Fashion, sportswear and luxury brands	Elimination of hazardous chemicals						Transparency			
	All hazardous chemicals**	APEOs	PFCs	Phthalates	Heavy Metals	MRSL	Wastewater Data: Where published	Wastewater Data: % of wet process facilities published	Suppliers list: % and tier published	Detox progress report: Last published in (Year)
adidas	No info	No info	No info	No info	No info	ZDHC	ZDHC Detox Live, IPE & IPE Green Supply Chain	80%	Primary T2 wet process suppliers	2019
benetton	97.07% - 100% ZDHC MRSL compliance depending on chemical group	98.2 % ZDHC MRSL compliance	98 % ZDHC MRSL compliance	99.5 % ZDHC MRSL compliance	Approx. 55% - 98% aspirational level	ZDHC	Benetton's website ZDHC Detox Live and IPE	90%	97% T1 and T2	2020
BURBERRY	99 % ZDHC MRSL compliance	97.4 % ZDHC MRSL compliance	96.6% compliance with Burberry MRSL	99.1 % ZDHC MRSL compliance	50% - 100% aspirational level	ZDHC with additions, but for wastewater ZDHC	On Burberry website and ZDHC Detox Live	Approx. 93%	No info	2020
C&A	99.6% ZDHC MRSL compliance	87.84% of facilities tested no detection	Over 93% of facilities tested no detection	89.2% of facilities tested no detection	No info	ZDHC	ZDHC Detox Live,, IPE and IPE Green Supply Chain	100%	100% of T1 and T2 and a number of T3 vertically integrated production units	2019
ESPRIT	Not enough info	Not enough info	Not enough info	Not enough info	Not enough info	ZDHC	ZDHC Detox Live,, IPE and IPE Green Supply Chain	68% of key wet processing mills	100% of T1 and T2, 33% of T3	2018
FAST RETAILING	99.8% ZDHC MRSL compliance	98.7% ZDHC MRSL compliance	97.0% ZDHC MRSL compliance	99.6% ZDHC MRSL compliance	Approx. 50% - 100% aspirational level	ZDHC with additions; wastewater ZDHC from 2019	IPE	No percentage given	49 fabric mill suppliers	2020
G-STAR	close to 95% of facilities tested no detection	100% of facilities tested no detection (treated wastewater)	Not enough info	Not enough info	No info	ZDHC with additions, wastewater ZDHC from 2019	ZDHC Detox Live	85%	95% T1 100% of processing facilities used in T1	2020
H&M	99.93% ZDHC MRSL compliance 92% of facilities tested no detection	99.66% ZDHC MRSL compliance	98.66% ZDHC MRSL compliance	99.85% ZDHC MRSL compliance	80% - 98% aspirational level	ZDHC	ZDHC Detox Live, IPE and IPE Green Supply Chain	100%	100% All tiers	2020
INDITEX	94.2% - 100 % compliance Inditex	94.2% compliance Inditex	99.5% compliance Inditex	99.3% compliance Inditex	59.3% compliance Inditex	Individual MRSL	Inditex website, ZDHC Detox Live & IPE Green Supply Chain	Around 60%	List of wet process factories, but Link does not work	2018
Levi's	No info	No info	No info	No info	No info	ZDHC	ZDHC Detox Live, IPE & IPE Green Supply Chain	Over 85%	List of garment facilities tested and fabric mills, no percentage given	2020

Brand / company	Elimination of hazardous chemicals						Transparency			
	All hazardous chemicals***	APEOs	PFCs	Phthalates	Heavy Metals	MRSL	Wastewater Data		Suppliers list	Detox progress report
Fashion, sportswear and luxury brands							Where published	% of wet process facilities published	% and tier published	Last published in (Year)
VICTORIA'S SECRET	Not enough info	100% of facilities tested no detection	PFCs detected in 2 facilities tested	Phthalates detected in 2 facilities tested	Heavy metals limits exceeded in 9 facilities tested	ZDHC	IPE	95%	T1 only	2019
LI-NING	No info	No info	No info	No info	No info	ZDHC	IPE	core material suppliers	No info	2019
MANGO	India: 0% - 100% of facilities tested no detection depending on chemical group China: 38% - 100% of facilities tested no detection depending on chemical group	India: 0% of facilities tested no detection China: over 85% of facilities tested no detection	India: 100% of facilities tested no detection China: 38% of facilities tested no detection	India: 100% of facilities tested no detection China: 38% of facilities tested no detection	India: 0% of facilities tested no detection China: 0% of facilities tested no detection	Individual MRSL	IPE	9%	T1 only	2018
M&S	No info	No info	No info	No info	No info	ZDHC	ZDHC Detox Live, IPE (in China)	No percentage given	T1, no info on %	No reports, only info on website
Miroglio	Test results of 4 suppliers of Miroglio Fashion and of 2 suppliers of Miroglio Textiles on website but no analysis or percentages given					Individual MRSL	ZDHC Detox Live, IPE	No info	No info	Miroglio Fashion: 2018 Miroglio Textile: 2019
NIKE	85% of facilities tested no detection	No info	No info	No info	No info	ZDHC	ZDHC Detox Live and IPE Green Supply Chain	Strategic material vendors	Yes, but no info on tier and percentage	2020
PRIMARK	No info	No info	No info	No info	No info	ZDHC	ZDHC Detox Live	32 sites tested out of 1018 global suppliers	Production sites of 95% of Primarks suppliers	2019
PUMA	94.% - 100% ZDHC MRSL compliance depending on chemical group	100% or close to 100% ZDHC MRSL compliance	94% ZDHC MRSL compliance	100% or close to 100% ZDHC MRSL compliance	No info	ZDHC	ZDHC Detox Live, IPE and IPE Green Supply Chain	90% of core suppliers	80%	2020
VALENTINO	51% - 100% of facilities tested no detection depending on chemical group	76% or 78.6% of facilities tested no detection (two different numbers reported)	63% or 78.6% of facilities tested no detection (two different numbers reported)	51% or 57.1% of facilities tested no detection (two different numbers reported)	0% of facilities tested no detection	Individual MRSL	Valentinos website and IPE	Over 80%	80% Map including wastewater tests but no names or addresses	2019

Brand / company	Elimination of hazardous chemicals						Transparency			
	All hazardous chemicals**	APEOs	PFCs	Phthalates	Heavy Metals	MRSL	Wastewater Data		Suppliers list	Detox progress report
							Where published	% of wet process facilities published	% and tier published	Last published in (Year)
Multiple Retailers										
ALDI	23% - 98% of facilities tested no detection depending on chemical group	78% of facilities tested no detection	82% of facilities tested no detection	76% of facilities tested no detection	0.3% of facilities tested no detection	Individual MRSL until 2019, ZDHC MRSL for wastewater from 2020 on	IPE	97%	Main production facilities	2020
coop	No info	No info	No info	No info	No info	ZDHC	IPE	80%	Suppliers that sell products over CHF 50,000 Probably T1	2019
Kaufland	76.2% - 100% of facilities tested no detection depending on chemical group (after treatment)	97.6% of facilities tested no detection (after treatment)	95.2% of facilities tested no detection (after treatment)	92.9% of facilities tested no detection (after treatment)	9.5% of facilities tested no detection (after treatment)	Individual MRSL	IPE	100%	All strategic suppliers, T1 and T2	2020
LIDL	49% - 99% of facilities tested no detection depending on chemical group	97% of facilities tested no detection	87% of facilities tested no detection	79% of facilities tested no detection	22% of facilities tested no detection	Individual MRSL	IPE	21 out of 79 vertically integrated	Main production sites, T1	2020
REWE	51% - 100% of facilities tested no detection depending on chemical group	94% of facilities tested no detection	97% of facilities tested no detection	97% of facilities tested no detection	Less than 10 % of facilities tested no detection	Individual MRSL until 2019, ZDHC MRSL from 2020 on	IPE	100%	Primary production facilities	2020
Tchibo	81% - 99% no detection (not clear if referring to facilities or analytes tested)	89% no detection (not clear if referring to facilities or analytes tested)	81% no detection (not clear if referring to facilities or analytes tested)	91% no detection (not clear if referring to facilities or analytes tested)	25% no detection (not clear if referring to facilities or analytes tested)	Individual MRSL until 2019, ZDHC MRSL from 2020 on	ZDHC Detox Live	63%	96%	2020
TESCO	98.1% - 100% of facilities tested no detection depending on chemical group	99.4% of facilities tested no detection	98.8% of facilities tested no detection	99.9% of facilities tested no detection	Approx. 60% of facilities tested no detection	Individual MRSL, also allows ZDHC MRSL for wastewater	ZDHC Detox Live, IPE and IPE Green Supply chain	80%	T1 100% T2 80% T4 81% of man made cellulosic fibre producers	2020

	Elimination of hazardous chemicals						Transparency			
Brand / company	All hazardous chemicals**	APEOs	PFCs	Phthalates	Heavy Metals	MRSL	Wastewater Data		Suppliers list	Detox progress report
Outdoor brands							Where published	% of wet process facilities published	% and tier published	Last published in (Year)
PÁRAMO DIRECTIONAL CLOTHING	No info	No info	No info	No info	No info	Detox to Zero MRSL	No info	No info	100% wet process suppliers	2017
ROTAUF	Test results of 2 Asian suppliers on website but no analysis or percentages given					Individual MRSL	Rotaufs website & ZDHC Detox Live	2 asian suppliers tested	100% All tiers	2020
VAUDE	82% - 100% no detection (not clear if referring to facilities or analytes tested)	99% no detection (not clear if referring to facilities or analytes tested)	96% no detection (not clear if referring to facilities or analytes tested)	98% no detection (not clear if referring to facilities or analytes tested)	No info	Individual MRSL	ZDHC Detox Live	95%	Primary production facilities	2020
Suppliers										
UTENOS	99% Detox to Zero MRSL compliance	100% Detox to Zero MRSL compliance	100% Detox to Zero MRSL compliance	Close to 100% Detox to Zero MRSL compliance (2.9 ug/l DEHP was found)	Small traces of 6 heavy metals were found	Detox to Zero MRSL	On Utenos website	NA	NA	2021
CID	Testing results and case studies are regularly published on the CID website, but no reports with an analysis or a summary of the wastewater results.					Individual MRSL	On CID and participating brands websites	All companies that are part of CID	100%	2018

Data not used in analysis since unclear or difficult to compare

% of facilities tested no detection

Aspirational level for heavy metals

Individual MRSL

% of ZDHC MRSL compliance

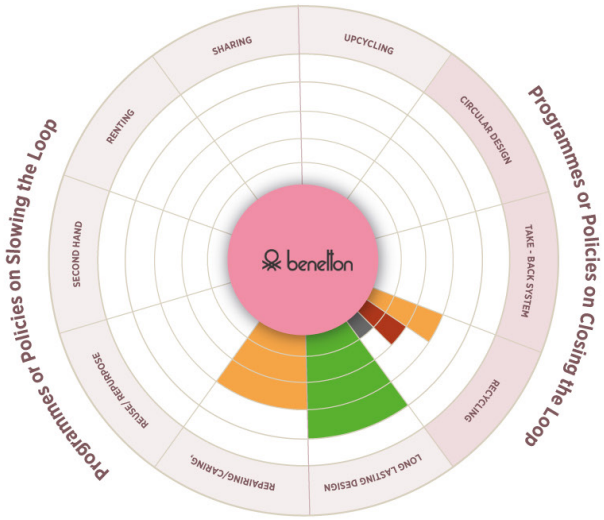
*info based on wastewater data

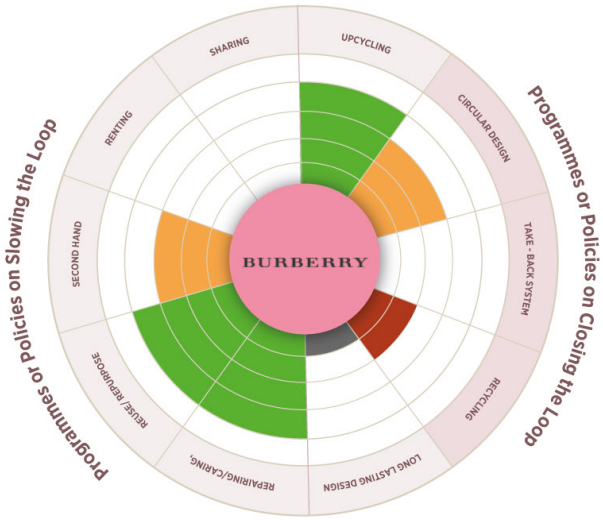
**not including heavy metals

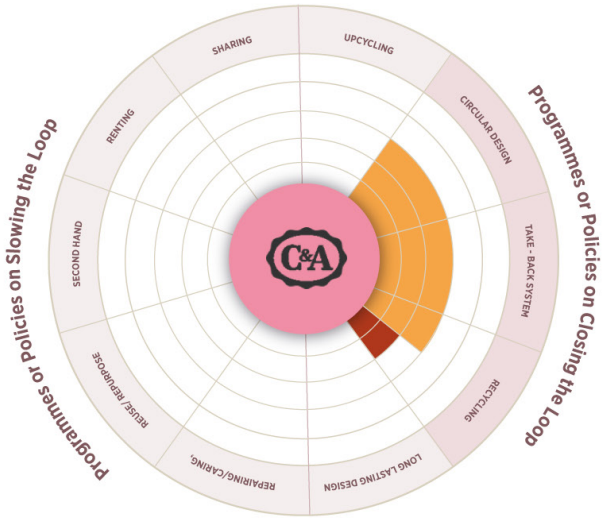
Table 2: Overview of efforts towards slowing the flow and closing the loop

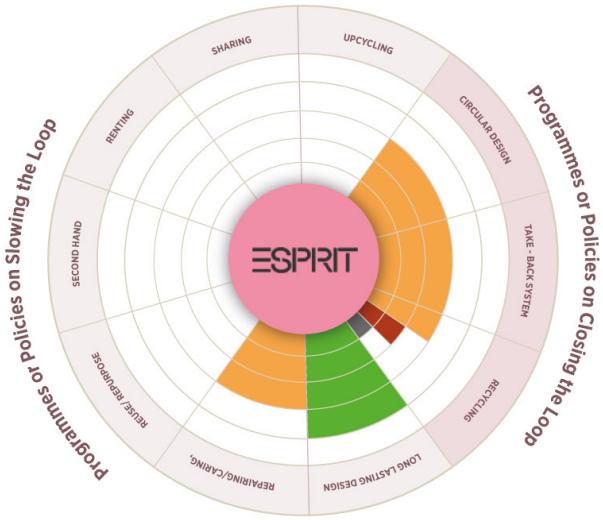
These images show the actions taken by each brand towards slowing the flow and closing the loop. In many cases there are no examples at all to record, and while a few companies have made a start with some good examples, these need to go much further. The further action that is needed is shown by the blank spaces in the images: to succeed in tackling this problem, a brand would need to fill all of these spaces with 'green' examples of actions that they are taking (with no red, yellow, or grey).

Not enough information	1 or more examples = 1 segment
Does not solve the problem i.e. not textile to textile recycling, use of synthetic fibres, scope of effort insignificant	1 or more examples = 2 segments
Idea is going in the right direction but some problems to solveand/or has to be scaled up i.e. efforts only covering few markets or products, unsolved problems with reuse or recycling of itemscollected through take back systems, impact unclear (eg. trainingor repair & care guides)	1 or more examples = 3 segments
Measure/project that could have a good impact if scaled up orcombined with other effective strategies	1 or more examples = 4 segments









Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING
REUSE/REPURPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
G-STAR

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING
REUSE/REPURPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
FAST RETAILING

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING
REUSE/REPURPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
INDITEX

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING
REUSE/REPURPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
H&M

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING
REUSE/REPURPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
VICTORIA'S SECRET

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING
REUSE/REPURPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
LEVI'S

Programmes or Policies on Closing the Loop
Programmes or Policies on Slowing the Loop
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REPURPOSE
SECOND HAND
RENTING
SHARING
LI-NING

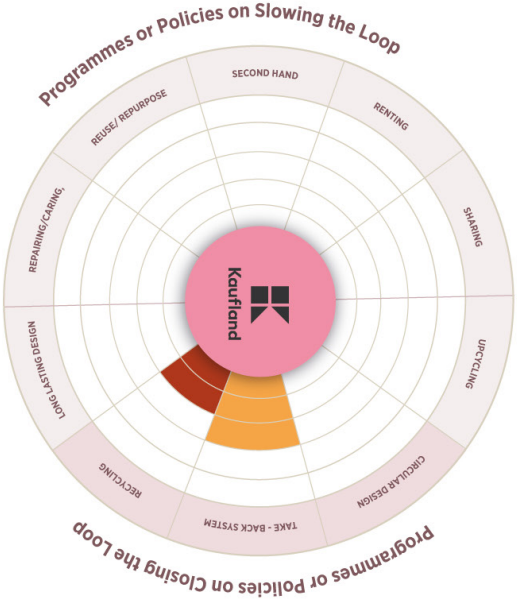
Programmes or Policies on Closing the Loop
Programmes or Policies on Slowing the Loop
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REPURPOSE
SECOND HAND
RENTING
SHARING
MANGO

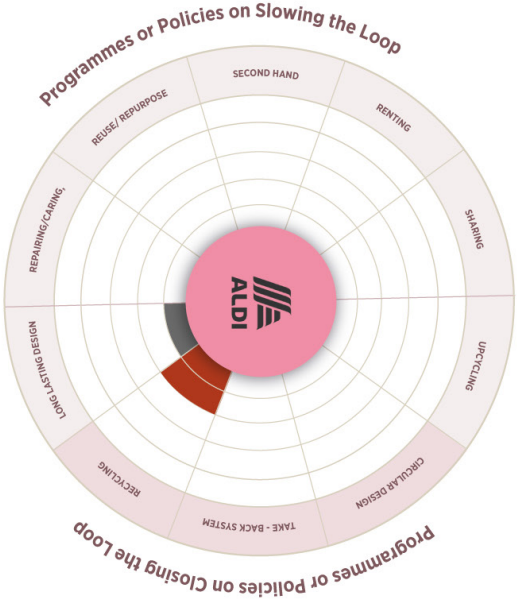
Programmes or Policies on Closing the Loop
Programmes or Policies on Slowing the Loop
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REPURPOSE
SECOND HAND
RENTING
SHARING
M&S

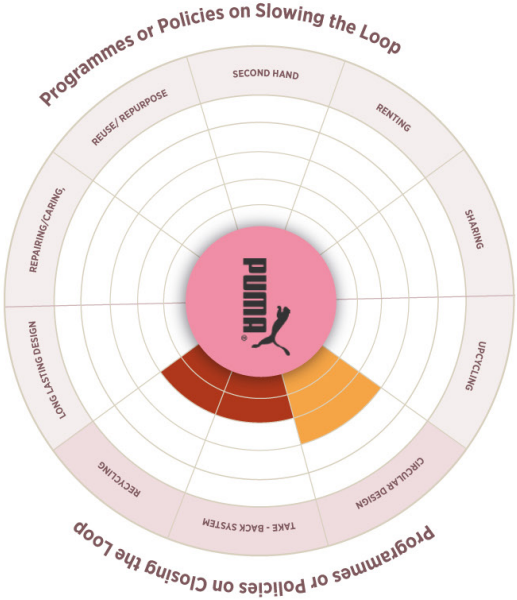
Programmes or Policies on Closing the Loop
Programmes or Policies on Slowing the Loop
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REPURPOSE
SECOND HAND
RENTING
SHARING
Miroglio

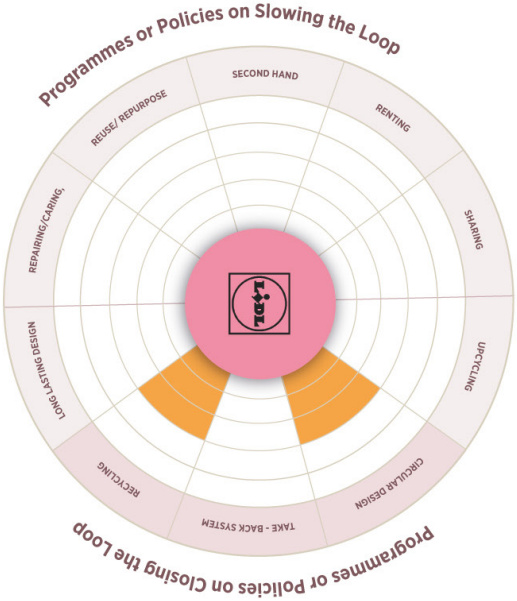
Programmes or Policies on Closing the Loop
Programmes or Policies on Slowing the Loop
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REPURPOSE
SECOND HAND
RENTING
SHARING
NIKE

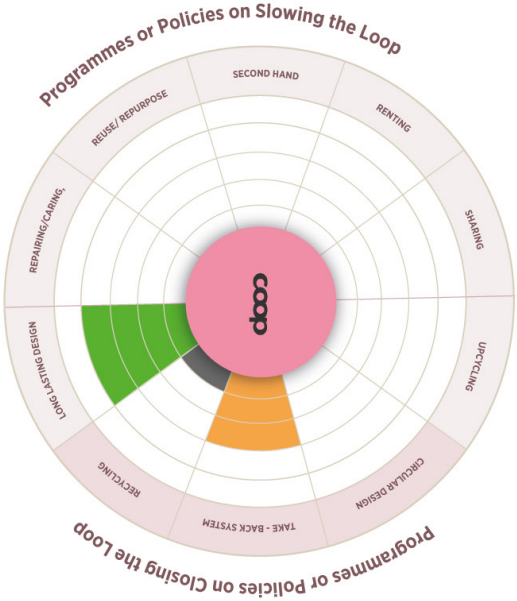
Programmes or Policies on Closing the Loop
Programmes or Policies on Slowing the Loop
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REPURPOSE
SECOND HAND
RENTING
SHARING
PRIMARK

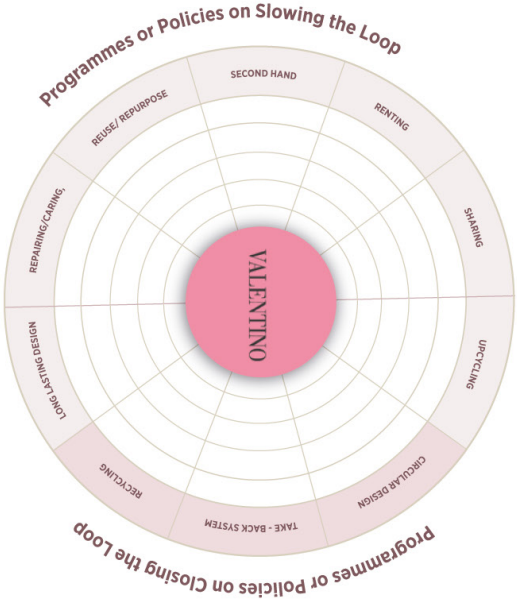

Programmes or Policies on Slowing the Loop
SECOND HAND
RENTING
SHARING
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING;
REUSE/ REPURPOSE
Programmes or Policies on Closing the Loop
Kaufland


Programmes or Policies on Slowing the Loop
SECOND HAND
RENTING
SHARING
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING;
REUSE/ REPURPOSE
Programmes or Policies on Closing the Loop
ALDI


Programmes or Policies on Slowing the Loop
SECOND HAND
RENTING
SHARING
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING;
REUSE/ REPURPOSE
Programmes or Policies on Closing the Loop
PUMA


Programmes or Policies on Slowing the Loop
SECOND HAND
RENTING
SHARING
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING;
REUSE/ REPURPOSE
Programmes or Policies on Closing the Loop
LIDL


Programmes or Policies on Slowing the Loop
SECOND HAND
RENTING
SHARING
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING;
REUSE/ REPURPOSE
Programmes or Policies on Closing the Loop
coop


Programmes or Policies on Slowing the Loop
SECOND HAND
RENTING
SHARING
UPCYCLING
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING;
REUSE/ REPURPOSE
Programmes or Policies on Closing the Loop
VALENTINO

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REHUMPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
Tchibo

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REHUMPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
REWE

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REHUMPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
PÁRAMO

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REHUMPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
TESCO

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REHUMPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
VAUDE

Programmes or Policies on Closing the Loop
CIRCULAR DESIGN
TAKE - BACK SYSTEM
RECYCLING
LONG LASTING DESIGN
REPAIRING/CARING,
REUSE/ REHUMPOSE
SECOND HAND
RENTING
SHARING
UPCYCLING
Programmes or Policies on Slowing the Loop
ROTAUF

Table 3: More detailed info for slowing the loop

Brand Name	Programmes or policies on slowing the flow	
benetton	Long lasting design	• Made efforts to **reduce product volume while increasing the quality** of products and materials with the ultimate goal of persuading end consumers to buy fewer but better quality items, moving away from fast fashion • Reduced by 35% its main supplier Olimpias's second choice items, as a result of the reorganization of the production chain, in the past one year and a half • B-long strategic project: aimed at ensuring compliance with Benetton quality standards and the durability of the materials that make up the garments produced by its suppliers. 46% of vendors involved in the development of the Fall Winter 2019 collection and 67% of those involved in the Spring Summer 2019 collection were tested.
	Repair & Care	• B-Care Guide "Wear. Care. Repair" on Benetton's website
BURBERRY	Long lasting design	• Brand statement: "Our beautifully made products are designed to last and we are committed to helping customers enjoy them for as long as possible."
	Repair & Care	• Around 14,750 repair and replacement part enquiries, ranging from Trench Coat reproofing to repairing vintage items were handled in FY 2019/20
	Reuse & Repurpose	• innovative solutions to repurpose products and offcut waste: • working to repurpose and reinvent products by adding seasonal and on-trend embellishments such as embroideries and appliquéd patches. • launched a new partnership with Alta Scuola di Pelletteria Italiana, a leather school, and San Patrignano, an organisation supporting marginalised youth. The school will train San Patrignano residents in leather goods disassembly and repurposing using donated unsaleable Burberry leather products • donated products and raw materials to various charities, design schools and colleges globally, including the Royal College of Art and the Manchester Fashion Institute. • was running finished product revaluing pilots with 10 new partners in 2020 • ceased destroying unsaleable finished products from 2018
	Second hand	• Launched pilot in the US with The RealReal **a luxury consignment marketplace,** where customers can consign second hand luxury goods, to encourage customers to extend the life of their products through resale.
	Upcycling	• **innovative solutions to repurpose products and offcut waste:** UK: collaboration with sustainable luxury company Elvis & Kresse, which revalues our leather offcuts by transforming them into accessories and homewares Italy: donated material to Progetto Quid, a not-for-profit co-operative, which upcycles excess materials into clothes and accessories, employing mostly women from vulnerable backgrounds
ESPRIT	Long lasting design	• designing products that are durable and timeless: **Reduced the number of collections** to four **Reduced our style coun**t by 28% and overall quantity by 26%
	Repair & Care	• Repair service in 100% of German shops • Sustainable washing instructions: links to Clevercare on each garment

FAST RETAILING	**Long lasting design**	• Brand statement: "Fast Retailing strives to create simple clothing that is high in quality and functionality, and that customers can and will want to use for a long time."
H&M	**Repair & Care**	• **Repair and alteration service** in 8 stores • Tips on repair and care in 46 markets • Take care product range (patches, sewing kits etc) in 7 markets
	Second hand	• **Second hand platforms from H&M brands:** Afound offers unsold and pre-owned clothing, mostly from third party luxury brands, but also some from H&M group, in four markets COSresell: platform to buy and sell preowned COS pieces
	Renting	• **Rental platforms** from H&M brand: ARKET launched a kids clothes rental service together with Circos in 19 markets • COS partnered with the platform Ycloset to rent clothes in China • **Rental options** in Berlin and Stockholm
	Upcycling	• **Upcycling initiative** by H&M brands: Weekdays remade collection COS partnering with The renewal Workshop to launch the COS Restore collection
INDITEX	**Long lasting design**	• Training programme on circular economy for designer teams. Including design to increase the recyclability possibilities of the components of a garment and design focused on extending product durability
Levi's	**Long lasting design**	• Brand statement: "While LS&Co. has always made products that are built to last, we are actively exploring new ways to extend the life of our garments even further."
	Repair & Care **Reuse & Repurpose**	• **in-store Tailor Shops** at flagship stores around the globe: people can bring their denim to be repaired or repurposed, extending the life of the garments
	Second hand	• **Levi's® Authorized Vintage,** sold in eight global flagship stores, select Nordstrom's locations, and the Galleria Lafayette in France, has tripled in sales since it was first introduced in 2017. Vintage products, primarily jeans made in the US in the 1980s and 1990s, are made available for sale
Miroglio	**Upcycling**	• a collection containing upcycled garments made from unsold items from the previous season; nine items, including shirts, trousers, and pullovers, that can be appreciated in the windows of flagship stores
ALDI	**Long lasting design**	• Brand statement: • Product Design: We are continuously implementing and looking for new ways to strengthen the durability of our products. • Product Technologies: We strive to deliver quality products to our customers. We actively look for innovative ways to prolong the lifespan of products - enabling longevity and endurance.

coop	**Long lasting design**	• Timeless design and long-term wearability as opposed to fast fashion are key when developing its own-label brands • Focus on a standard range with basic models, supplemented by only **two new collections of selected seasonal pieces each year**
REWE	**Upcycling**	• Bags made out of Penny workers uniforms and sold to Penny staff; profits went to charity
PÁRAMO DIRECTIONAL CLOTHING	**Long lasting design**	• Fabrics designed NOT to become obsolete. Nikwax Analogy fabric system does not rely on laminates, membranes, or taped seams. As a result, there is no element to break down or fail over time. • Páramo Lifetime Guarantee
	Repair & Care	• Páramo's Repairs & Alterations Service
	Second hand	• Paramo Recycled eBay store
ROTAUF	**Long lasting design**	1. Selection of sustainable materials 2. Physical longevity of materials 3. Emotional longevity: our products tell a story and customers therefore love them for a long time 4. Aesthetic longevity: simple and timelines design
	Repair & Care	• Repair service that is used well by customers
VAUDE	**Long lasting design**	• iBrand statement: "VAUDE products are made to last. We want them to look good for years, to be repairable, and to have some social benefit when you no longer need them." • Forever yours: tips for a long product life
	Repair & Care	• Repair Index: tool to evaluate the reparability of VAUDE products • Vaude Repair Service: inhouse repair workshop, product can be sent in • Collaboration Vaude and - Ifixit: do it yourself repair instructions • Repair Cafes • Care and repair guide
	Second hand	• ebay Second Use Shop
	Renting	• Shareconomy iRentit: tents, mattresses, backpacks, trolleys and bike bags can be rented online, in Vaude stores in Germany and at the headquarters in Tettnang.
	Upcycling	• eBay Upcycling Store: Residual materials that accumulate at our manufacturers are auctioned off for a good cause. • Upcycling Workshop • Facebook Community

Table 4: More detailed information on closing the loop

Brand Name	Programmes or policies on closing the loop	
adidas	Circular design	• 100% recyclable shoes, Futurecraft.Loop and Ultraboost DNA Loop Planned release 2021
	Use of recycled materials	• 71% recycled polyester
	Recycling Target	• 100% recycled polyester from 2024 onward
	Products containing recycled materials	• Primegreen and Primeblue
benetton	Use of recycled material	• Started using recycled cotton in 2019, no info on amount
	Recycling Target	• 50% of synthetic materials from recycled fibers by 2030
	Products containing recycled materials	• A jacket made with wadding fiber obtained from recycled PET bottles • Products made with "Eco-Recycle" Denim, made with regenerated cotton fibre
BURBERRY	Circular design	• Training for creative teams
	Products containing recycled materials	• Econyl capsule collection. ECONYL® is a sustainable nylon yarn made from regenerated fishing nets, fabric scraps and industrial plastic, but this is just one collection.
C&A	Circular design	• Brought to market more than 4 million pieces of Cradle to Cradle Certified TM apparel (from 2017 to 2019) This includes T-shirts, jeans, and other items..
	Take-back System	• In-Store program including retail markets around the world Amount collected: 1422 metric tons in 2019
	Products containing recycled materials	• Sold 556000 items containing recycled polyester • 116740 items containing recycled cotton in 2019
ESPRIT	Circular design	• 100% of our designers are trained in circular fashion
	Take-back System	• No in store collection, customers can send clothes to PACKMEE Amount collected: 167433 kg between January 2018 and June 2020
	Use of recycled material	• Esprit reports on the percentages of recycled materials used, as follows: 0.1% recycled cotton 16% recycled polyester 18.65% of man-made cellulosics made with 30% recycled raw content

ESPRIT	**Recycling Target**	• Goal achieved in 2020: produced at least 150,000 garments containing at least 20% recycled post-consumer textile fibres
	Products containing recycled materials	• Several products listed under “sustainable styles”, including recycled cotton, recycled polyester, recycled polyamide, cellulosics and recycled wool, but the number of products needs to be increased for natural fibres.
FAST RETAILING	**Take-back System**	• In 23 countries and regions Amount collected: 41.11 million items donated (2006-2020) However, some clothing not suitable for reuse is converted to solid waste fuel
	Products containing recycled materials	• Recycled Down Jackets: all down and feather comes from the 620000 down jackets collected from customers • DRY-EX clothing containing polyester from recycled PET bottles • Yarn Fleece Pullovers containing 30% polyester from recycled PET bottles
G-STAR	**Circular design**	• Goal for 2025: 20% of the entire G-Star RAW collection will be made from Cradle to Cradle Certified™ fabrics
	Use of recycled material	• 10% recycled or mostly recycled fibers in 2020
	Products containing recycled materials	• Several products under sustainable collection
	Recyclable products	• Cradle to Cradle Certified denim fabric • Cradle to Cradle Certified Product range where full product is 100% recyclable
H&M	**Circular design**	• Circular design guidelines
	Take back system	• 29005 tonnes collected in 2019 Reused: 50-60% Recycled: 35-45% for other industries or into new fibres Disposed: 3-7% Incineration with energy recovery This reporting is a good development, however, destroying clothes by incineration is not a good option.
	Use of recycled material	• 5.8% in 2020, however, the breakdown of materials isn’t specified
	Recycling Target	• 30% by 2025

INDITEX	**Circular design**	• Training programme to ensure knowledge of the principles of circular economy among all our designer teams. Includes design set out to increase the recyclability possibilities of the components of a garment and design focused on extending product durability
	Take-back System	• In 2299 stores in 46 markets Amount collected: 15321 tons in 2019 Amount disposed: Energy recovery cannot exceed 5% of total garments collected
	Use of recycled material	• 7589 tons of items containing recycled materials on the market in 2019
Levi's	**Take-back System**	• In all company stores in Spain and France In selected stores in 6 other European countries
	Products containing recycled materials	• Some products but no specific collection or style found
	Recyclable products	• Wellthread™ line, fully recyclable, made from cottonized hemp, recycled jeans, and cotton scraps
VICTORIA'S SECRET	**Products containing recycled materials**	• A few products made from recycled PET, but no specific collection or style
LI-NING	**No info found**	
MANGO	**Take-back System**	• In all company stores in Spain and France In selected stores in 6 other European countries
	Recycling Target	• Aim to use 25% recycled materials in at least 25% of the clothing we sell by 2025
	Products containing recycled materials	• Men's suit made from 100% recycled materials
M&S	**Take-back System**	• In 287 stores Amount collected: 1.8 million garments in 2019/20 Mainly through UK and ROI partnership with Oxfam
	Recycling Target	• Aim to use 25% recycled materials in at least 25% of the clothing we sell by 2025
	Products containing recycled materials	• Men's suit made from 100% recycled materials

Miroglio	**No info found**	
NIKE	**Take-back System**	• Only for some shoes in North America and Europe
	Use of recycled material	• Less than 1% recycled cotton 26% recycled polyester 94% rubber 1% Ethylene-Vinyl Acetate (EVA) Foam
	Products containing recycled materials	• Some examples: Vapormax 2020 made with at least 50% recycled content by weight. Footwear collection "Space Hippie"'s Flyknit yarn is made from 85–90% recycled content, including plastic bottles, t-shirts, and post-industrial scraps. Flyleather is made with at least 50% recycled leather fiber, combined with synthetic materials
PRIMARK	**Take back system**	• In the UK only, 190 stores
PUMA	**Circular design**	• Virtual workshop with Circle Economy on the definition and concept of a circular economy and circular product design for our designers, product line managers, developers, and sourcing teams.
	Take-back System	• Pilot in Hong Kong
	Products containing recycled materials	• First Mile collection made from recycled plastic bottles.
VALENTINO	**No info found**	
ALDI	**Products containing recycled materials**	• Bedding made from recycled PET bottles
	Recyclable products	• Pilot project recyclable shoe
coop	**Take-back System**	• More than 500 sales outlets
	Products containing recycled materials	• Some textile products with the "Oecoplan" label

Kaufland	**Take-back System**	• In 46% of stores in Germany
	Products containing recycled materials	• Blankets made out of used workers uniforms, were donated for a good cause
LIDL	**Circular design**	• See recyclable products below
	Recyclable products	• Pilot project with Cradle-to-Cradle-Products, collection with shirts, nightwear, and bedding
REWE	**Take-back System**	• 623 collection containers in 2019 Reuse: 57 % Recycling: 33 % Other use: 10 %
	Products containing recycled materials	• Rewe has some socks with 70 % recycled cotton and Penny has or used to have (not quite clear) a bed cover with recycled polyester filling. • Bags were made out of Penny workers uniforms and sold to Penny staff, profit went to a charity
Tchibo	**Take-back System**	• Products collected by FairWertung not in Tchibo stores
	Products containing recycled materials	• some products with recycled PET bottles • fibres from textile waste and fishing nets
TESCO	**Take-back System**	• Trial in UK in 2019 in 86 stores Amount collected: over 100 tonnes
	Products containing recycled materials	• uniforms made from 100% recycled polyester • Some products with some recycled polyester
PÁRAMO DIRECTIONAL CLOTHING	**Take-back System**	• In brand stores and retailers Repaired and refurbished items are sold at the Paramo recycled Ebay store
	Recyclable products	• All Paramo products are suited for textile-to textile recycling, since they are not made out of mixed materials, but of 100% polyester
ROTAUF	**Circular design**	• We design our products in a way that makes it possible to either compost them (eg. wool) or recycle them, eg. through the use of mono-materials and by making sure they are produced without hazardous chemicals • Each product has a closed loop score
	Take-back System	• Looking for a bigger brand to partner with
	Recyclable products	• Use of mono-materials makes recycling possible

VAUDE

Circular design	• VAUDE Product Philosophy: Performance meets Ecology Timeless – sustainable – repairable
Take-back System	• In collaboration with Fairwertung
Use of recycled material	• Econyl: made out of nylon waste (fishing nets etc) • Post industrial recycled Polyamide • Polyester made from PET bottles • Recycled Down (no percentages given)
Products containing recycled materials	• 33% of all products contain at least 30% recycled materials

Key:

"Recycling" includes:
- Products containing recycled materials
- Use of recycled material
- Recyclable products

Links to company information

Reports and websites that were analysed, for hazardous chemicals and slowing the flow/closing the loop.

All information is correct as of 10th May 2021. Updates since this date are not included. Links are correct as of 17th November 2021.

(1) Adidas:

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5. Ruder AM. (2006), Potential health effects of occupational chlorinated solvent exposure. Ann N Y Acad Sci. 2006 Sep;1076:207-27. https://www.ncbi.nlm.nih.gov/pubmed/17119204

6. The wastewater data of five brands and the suppliers could not be included in this analysis for various reasons, including: it was unclear if they were reporting "MRSL compliance" or the percentage of facilities with no detection (Tchibo and Vaude); two different numbers were reported for each chemical group (Valentino), or the data was not comparable (Mango reported results by country only and no global data, Limited brands (Victoria's Secret) did not give percentages, the Italian Detox Consortium (CID) only publishes testing results of each supplier and no overall analysis of the wastewater data and Utenos is a single supplier and can therefore not be compared to all suppliers of a brand). Also, as mentioned above, nearly a third of the brands did not include detailed wastewater results or analysis in their latest reports and were therefore not included. These are Adidas, Nike, Levi's, Primark, M&S, Coop, Li Ning and Paramo.

7. Rewe 2020; https://www.rewe-group.com/content/uploads/2020/12/detox-fortschrittsbericht-2019.pdf

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