

A woman with dark hair pulled back, wearing a bright pink tank top and dark blue jeans. Her face, neck, and arms are covered in red body paint. She is holding a blue water bottle with a white target symbol on it. The background is a plain, light grey.

# **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**



Image: Textile Composting in Hamburg  
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## Part 2: Evaluation of Detox Committed brands, 2021 - the ten-year milestone

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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,<sup>1</sup> 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 <sup>2</sup>	Examples of uses /functions <sup>3</sup>	Examples of hazards to environment and human health (see note*) and relevant regulation
1. Alkylphenols/alkylphenol ethoxylates (APs/APEs), including nonylphenols/nonylphenoethoxylates (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. <sup>4</sup>
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. <sup>5</sup> 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.

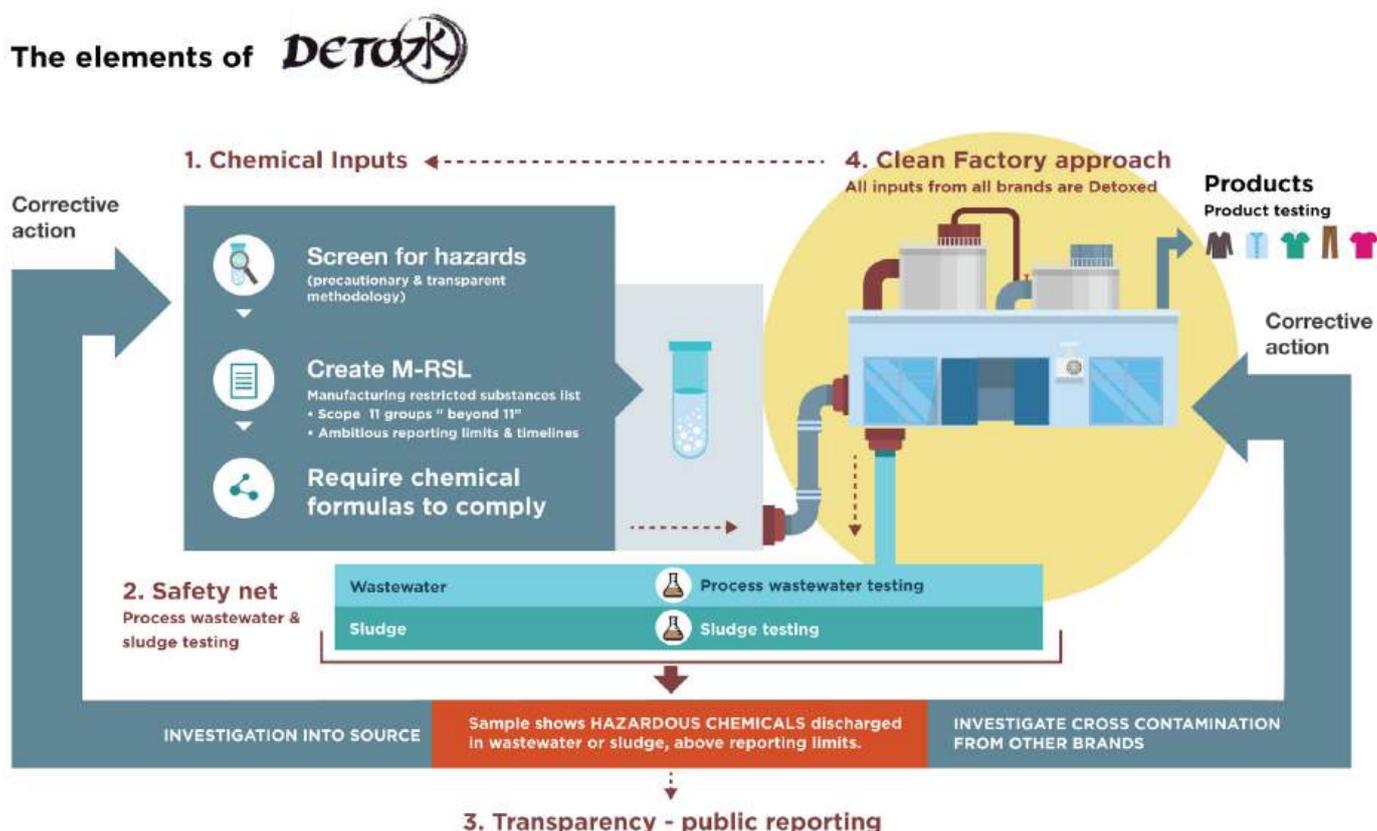


Figure 1: The Elements of Detox (diagram from Destination Zero)

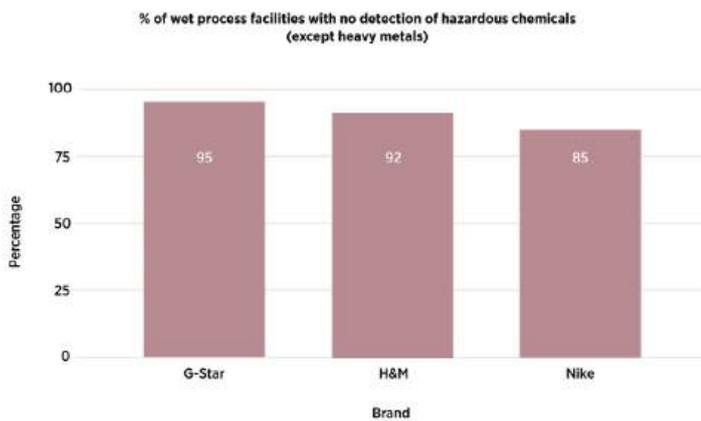
## 2. Trend towards zero discharge emerging, but more work needed

Due to the issues explained above, any non-comparable, incomprehensible or contradictory wastewater data<sup>6</sup> 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.

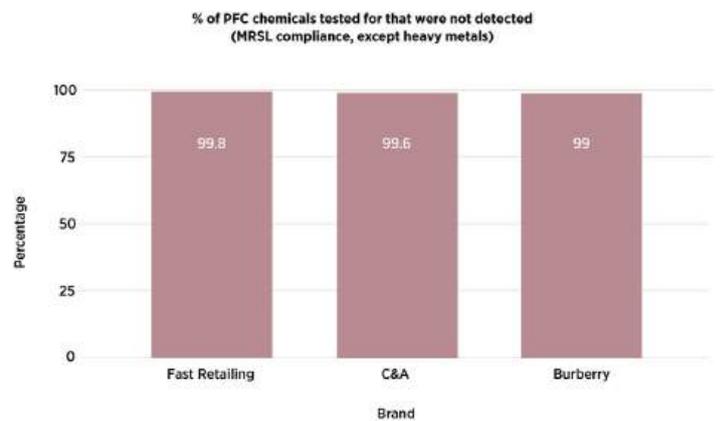
### 2.1 Elimination of all hazardous chemicals:

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

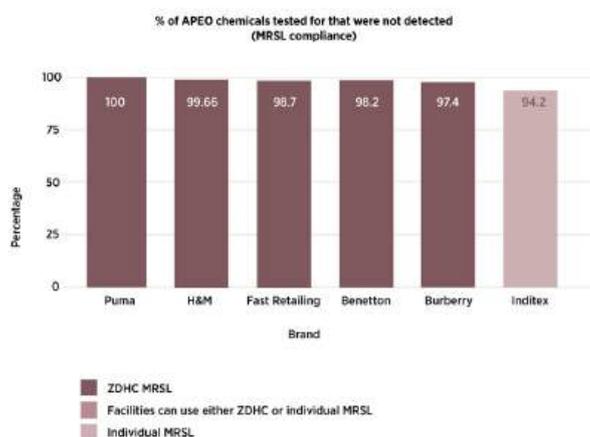
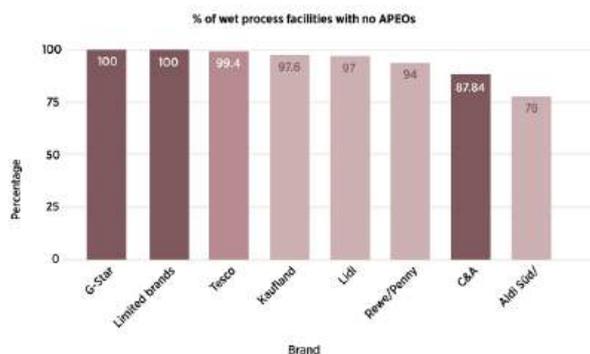


Graph 2: Percentage of chemicals tested for that were not detected (MRSL compliance, except heavy metals) per brand.

## 2.2 Elimination of priority chemical groups:

### APEOs:

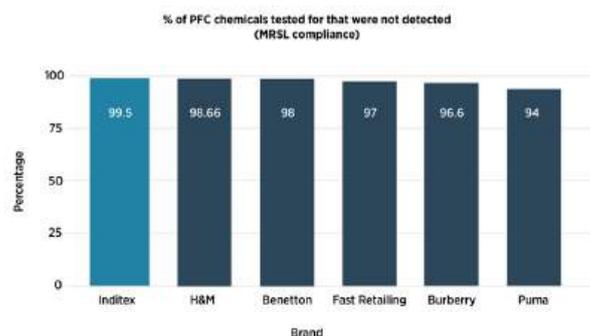
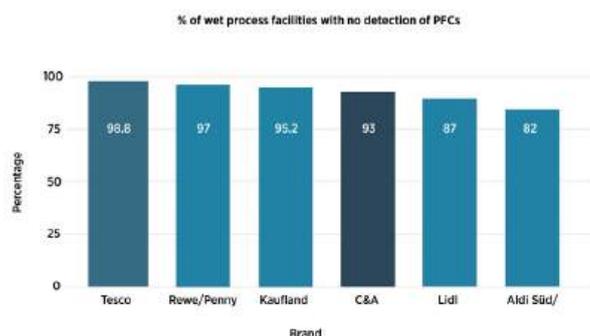
For APEOs, wastewater data from 14 brands could be included in the analysis (see graphs 3 and 4). Again, those brands who reported “MRSL compliance” generally had better scores than those reporting the percentage of facilities where APEOs were not detected (see 2.1 above). The two graphs below also show 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.



Legend:  
 ■ ZDHC MRSL  
 ■ Facilities can use either ZDHC or individual MRSL  
 ■ Individual MRSL

### 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.



Legend:  
 ■ ZDHC MRSL  
 ■ Facilities can use either ZDHC or individual MRSL  
 ■ Individual MRSL

### 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.

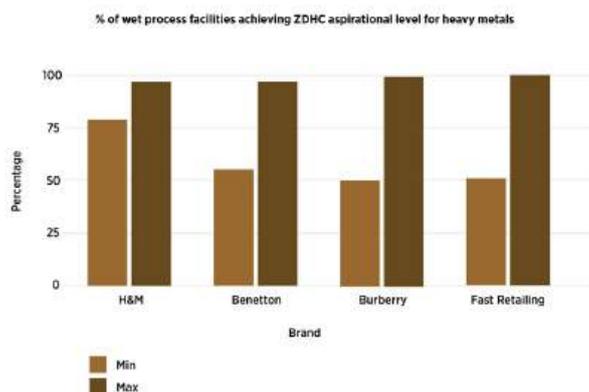
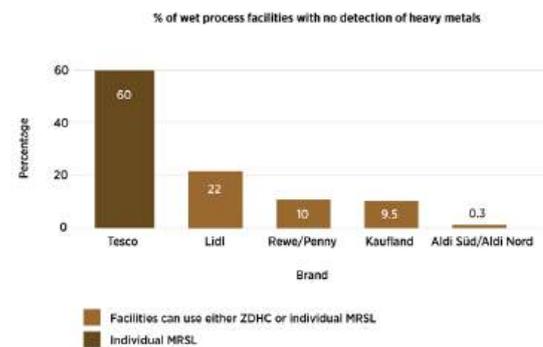
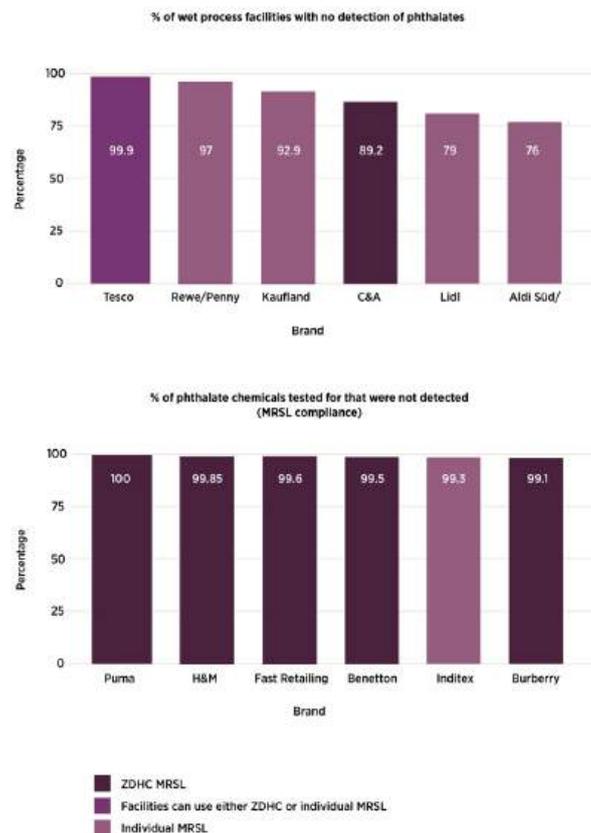
### Top to bottom

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

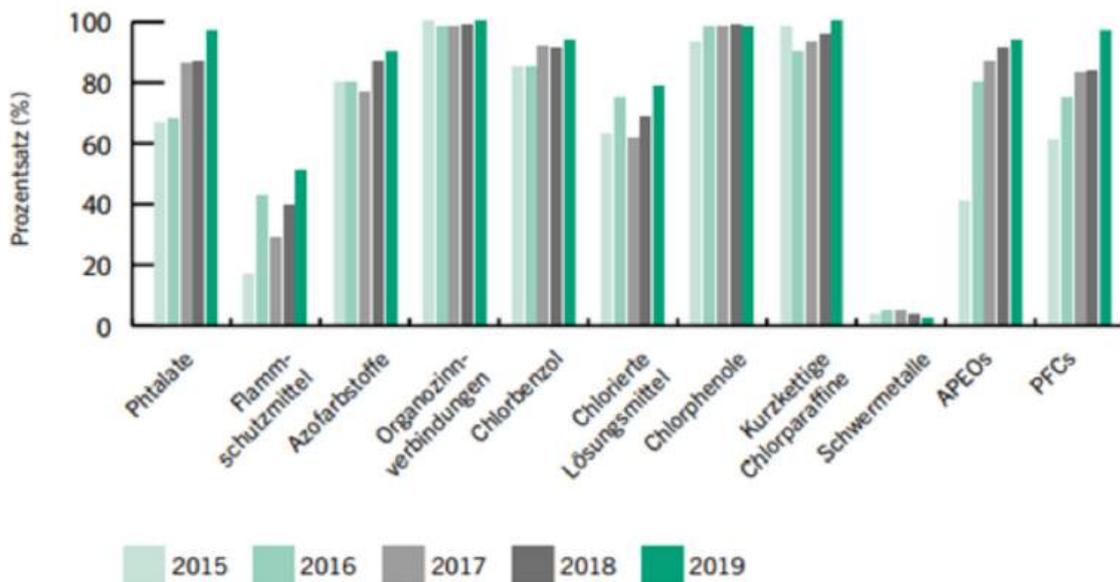
To conclude, the wastewater data from this research indicates that the trend towards zero discharge of hazardous chemicals continues, and many Detox brands have managed to eliminate hazardous chemicals from over 90% of their facilities, including priority chemical groups such as APEOs, PFCs, and phthalates. 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<sup>7</sup>). 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**

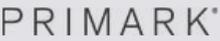
Elimination of hazardous chemicals

Transparency

Brand / company	All hazardous chemicals**	APEOS	PFCs	Phthalates	Heavy Metals	MRSL	Wastewater Data		Suppliers list	Detox progress report
							Where published	% of wet process facilities published		
Fashion, sportswear and luxury brands										
	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
	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
	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
	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
	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
	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
	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
	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
	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 <a href="#">Link</a> does not work	2018
	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

Elimination of hazardous chemicals

Transparency

Brand / company	All hazardous chemicals**	APEOS	PFCs	Phthalates	Heavy Metals	MRSL	Wastewater Data		Suppliers list	Detox progress report
							Where published	% of wet process facilities published		
Fashion, sportswear and luxury brands										
	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
	No info	No info	No info	No info	No info	ZDHC	IPE	core material suppliers	No info	2019
	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
	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
	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
	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
	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
	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
	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	Valentino's website and IPE	Over 80%	80% Map including wastewater tests but no names or addresses	2019

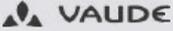
Elimination of hazardous chemicals

Transparency

Brand / company	All hazardous chemicals**	APEOS	PFCS	Phthalates	Heavy Metals	MRSL	Wastewater Data		Suppliers list	Detox progress report
							Where published	% of wet process facilities published		
Multiple Retailers										
	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
	No info	No info	No info	No info	No info	ZDHC	IPE	80%	Suppliers that sell products over CHF 50,000 Probably T1	2019
	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
	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
	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
	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
	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

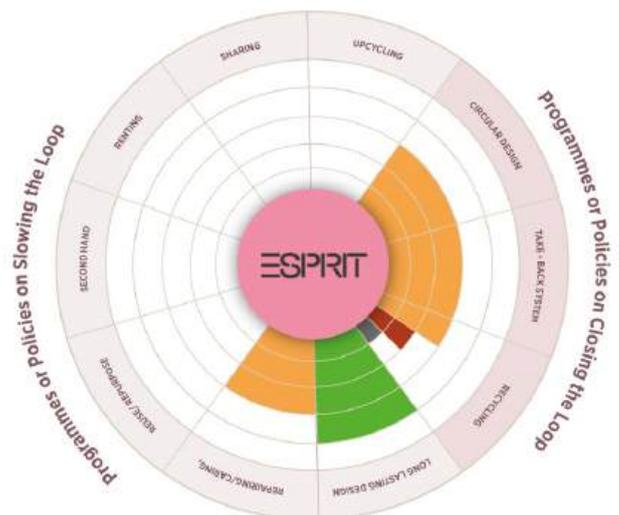
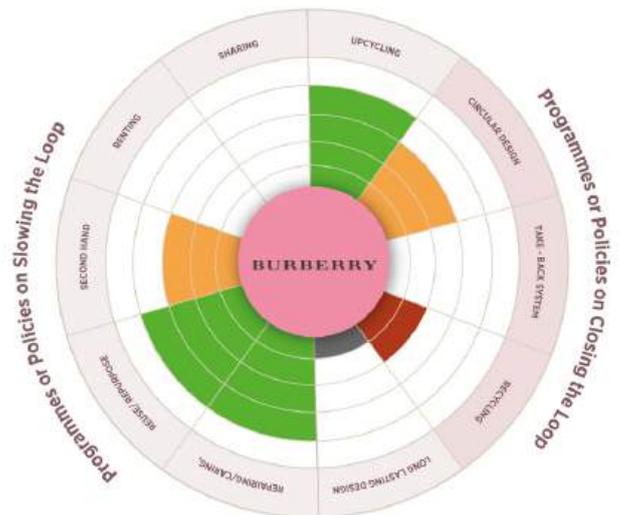
Brand / company	All hazardous chemicals**	APEOS	PFCS	Phthalates	Heavy Metals	MRSL	Wastewater Data		Suppliers list	Detox progress report
							Where published	% of wet process facilities published		
Outdoor brands										
	No info	No info	No info	No info	No info	Detox to Zero MRSL	No info	No info	100% wet process suppliers	2017
	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
	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										
	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
	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

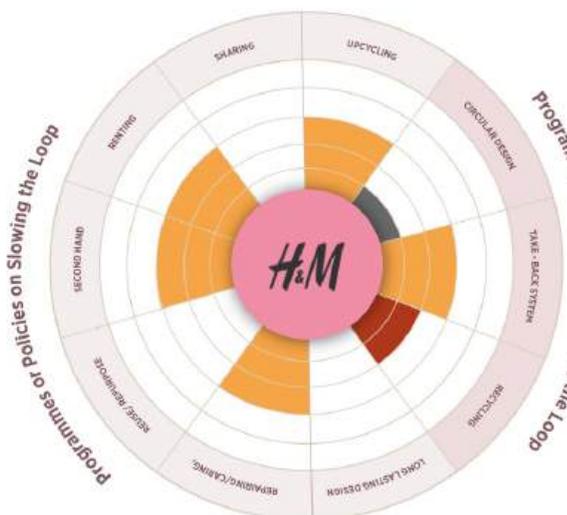
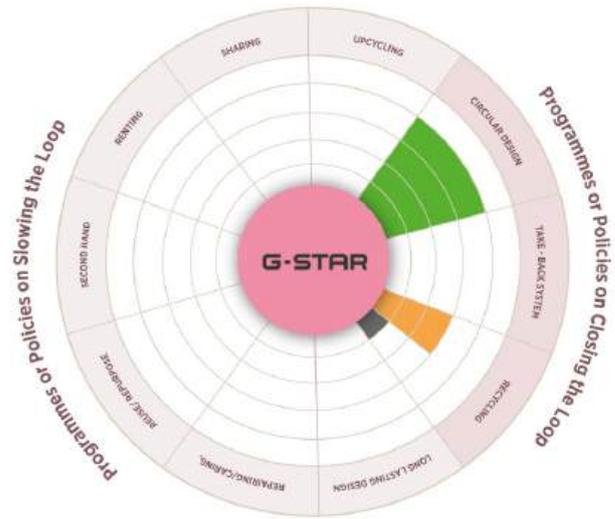
- Data not used in analysis since unclear or difficult to compare
  - % of facilities tested no detection
  - Aspirational level for heavy metals
  - Individual MRSL
  - % of ZDHC MRSL compliance
- \*info based on wastewater data  
 \*\*not including heavy metals

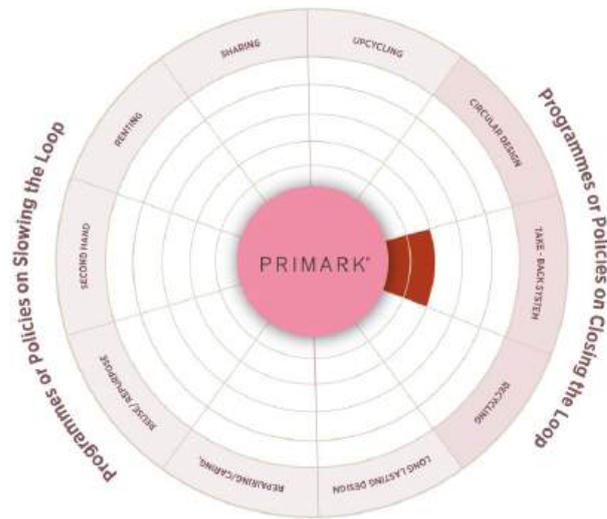
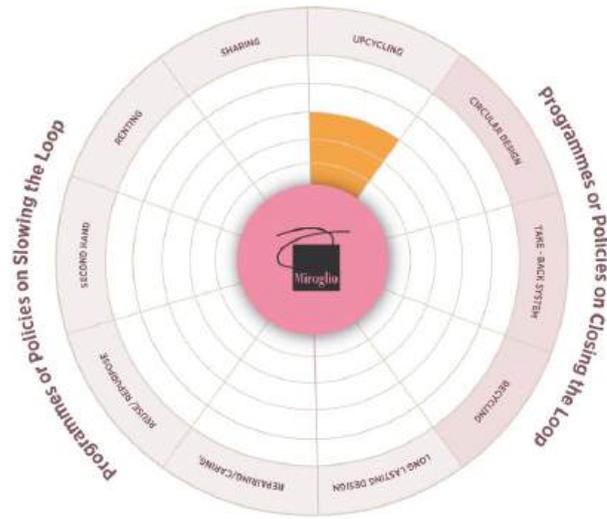
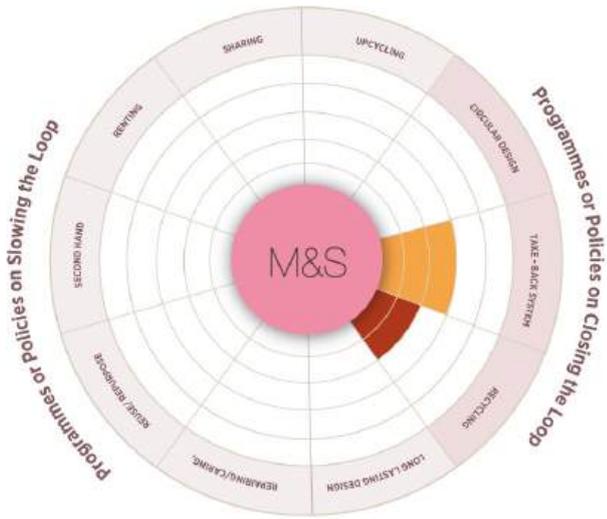
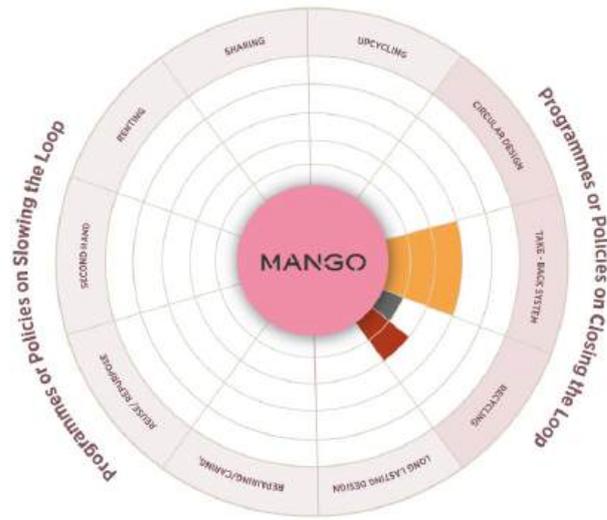
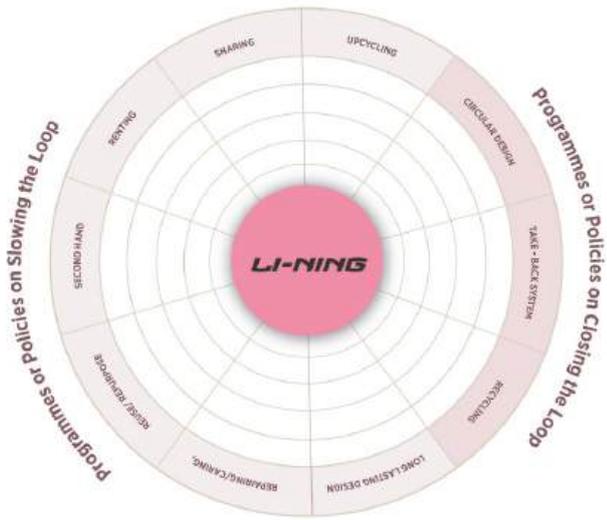
**Table 2: Overview of efforts towards slowing the flow and closing the loop**

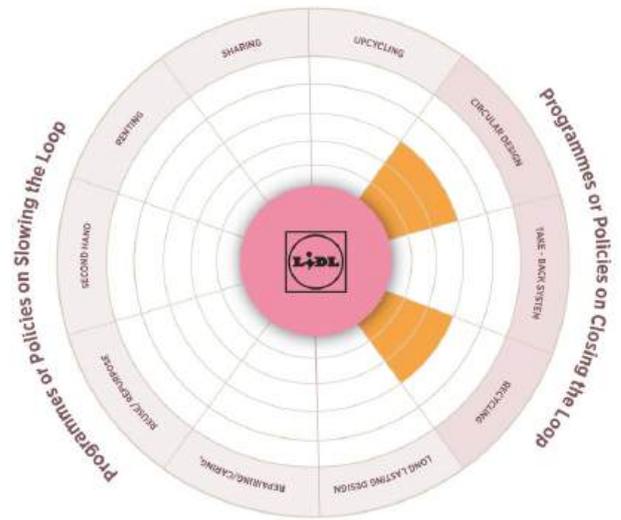
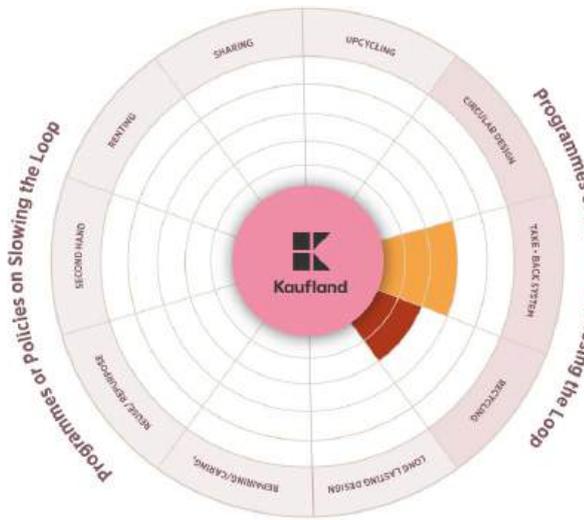
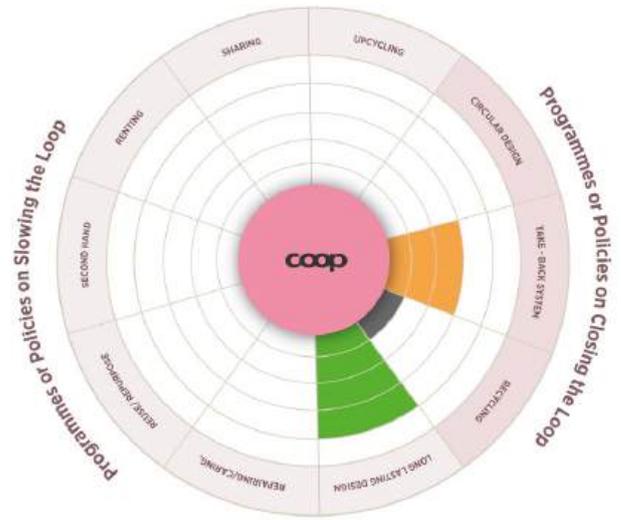
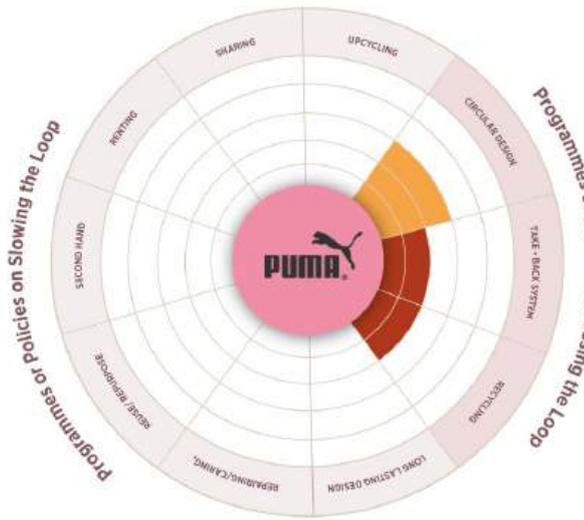
These images show the actions taken by each brand towards slowing the flow and closing the loop. In many cases there are no examples at all to record, and while a few companies have made a start with some good examples, these need to go much further. The further action that is needed is shown by the 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).

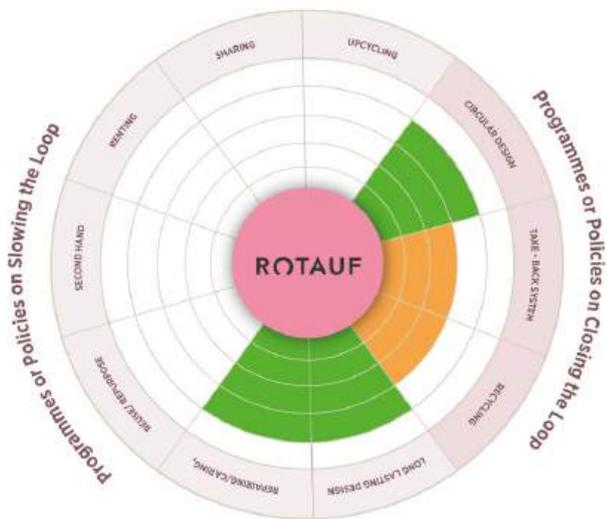
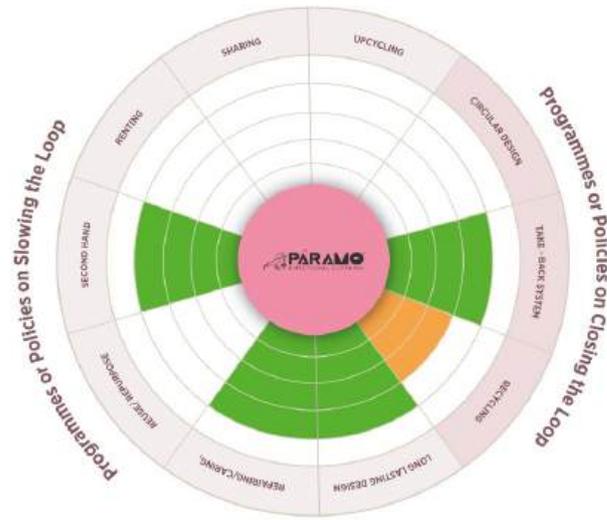
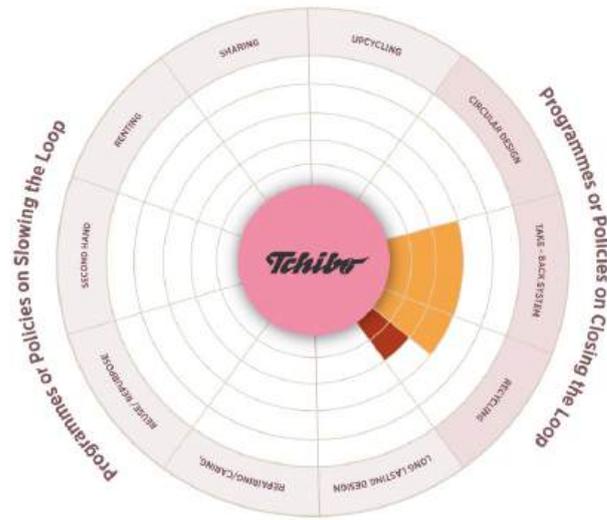
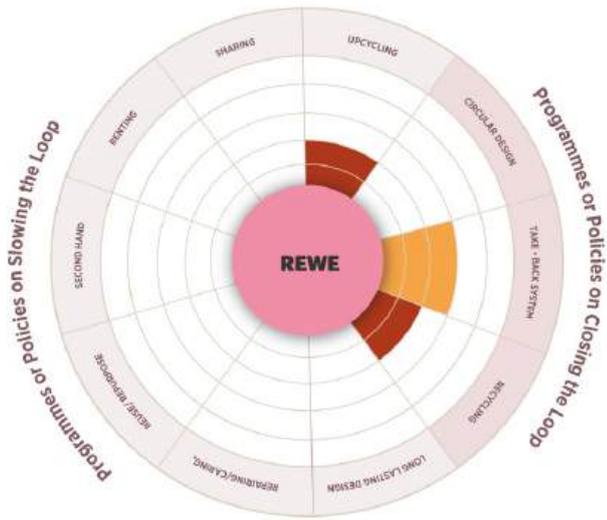
- Not enough information 1 or more examples = 1 segment
- Does not solve the problem i.e. not textile to textile recycling, use of synthetic fibres, scope of effort insignificant 1 or more examples = 2 segments
- Idea is going in the right direction but some problems to solve and/or has to be scaled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



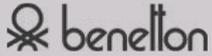




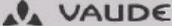




**Table 3: More detailed info for slowing the loop**

Brand Name	Programmes or policies on slowing the flow	
	<p><b>Long lasting design</b></p>	<ul style="list-style-type: none"> <li>Made efforts to <b>reduce product volume while increasing the quality</b> of products and materials with the ultimate goal of persuading end consumers to buy fewer but better quality items, moving away from fast fashion</li> <li>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</li> <li>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.</li> </ul>
	<p><b>Repair &amp; Care</b></p>	<ul style="list-style-type: none"> <li>B-Care Guide "<a href="#">Wear. Care. Repair</a>" on Benetton's website</li> </ul>
<p><b>BURBERRY</b></p>	<p><b>Long lasting design</b></p>	<ul style="list-style-type: none"> <li>Brand statement: "Our beautifully made products are designed to last and we are committed to helping customers enjoy them for as long as possible."</li> </ul>
	<p><b>Repair &amp; Care</b></p>	<ul style="list-style-type: none"> <li>Around 14,750 repair and replacement part enquiries, ranging from Trench Coat reproofing to repairing vintage items were handled in FY 2019/20</li> </ul>
	<p><b>Reuse &amp; Repurpose</b></p>	<ul style="list-style-type: none"> <li>innovative solutions to repurpose products and offcut waste:</li> <li>working to repurpose and reinvent products by adding seasonal and on-trend embellishments such as embroideries and appliquéd patches.</li> <li>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</li> <li>donated products and raw materials to various charities, design schools and colleges globally, including the Royal College of Art and the Manchester Fashion Institute.</li> <li>was running finished product revaluing pilots with 10 new partners in 2020</li> <li>ceased destroying unsaleable finished products from 2018</li> </ul>
	<p><b>Second hand</b></p>	<ul style="list-style-type: none"> <li>Launched pilot in the US with <a href="#">The RealReal</a> a luxury consignment marketplace, where customers can consign second hand luxury goods, to encourage customers to extend the life of their products through resale.</li> </ul>
<p><b>Upcycling</b></p>	<ul style="list-style-type: none"> <li><b>innovative solutions to repurpose products and offcut waste:</b></li> <li>UK: collaboration with sustainable luxury company Elvis &amp; Kresse, which revalues our leather offcuts by transforming them into accessories and homewares</li> <li>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</li> </ul>	
	<p><b>Long lasting design</b></p>	<ul style="list-style-type: none"> <li>designing products that are durable and timeless:  <b>Reduced the number of collections</b> to four  <b>Reduced our style count</b> by 28% and overall quantity by 26%</li> </ul>
	<p><b>Repair &amp; Care</b></p>	<ul style="list-style-type: none"> <li>Repair service in 100% of German shops</li> <li>Sustainable washing instructions: links to <a href="#">Clevercare</a> on each garment</li> </ul>

	<b>Long lasting design</b>	<ul style="list-style-type: none"> <li>• 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.”</li> </ul>
	<b>Repair &amp; Care</b>	<ul style="list-style-type: none"> <li>• <b>Repair and alteration service</b> in 8 stores</li> <li>• <a href="#">Tips on repair and care</a> in 46 markets</li> <li>• Take care product range (patches, sewing kits etc) in 7 markets</li> </ul>
	<b>Second hand</b>	<ul style="list-style-type: none"> <li>• <b>Second hand platforms from H&amp;M brands:</b>  <a href="#">Afound offers unsold and pre-owned clothing</a>, mostly from third party luxury brands, but also some from H&amp;M group, in four markets  <a href="#">COSresell</a>: platform to buy and sell preowned COS pieces</li> </ul>
	<b>Renting</b>	<ul style="list-style-type: none"> <li>• <b>Rental platforms</b> from H&amp;M brand: <a href="#">ARKET launched a kids clothes rental service</a> together with Circos in 19 markets</li> <li>• COS partnered with the platform Ycloset to rent clothes in China</li> <li>• <b>Rental options</b> in Berlin and Stockholm</li> </ul>
	<b>Upcycling</b>	<ul style="list-style-type: none"> <li>• <b>Upcycling initiative</b> by H&amp;M brands:  <a href="#">Weekdays remade collection</a>  <a href="#">COS partnering with The renewal Workshop</a> to launch the COS Restore collection</li> </ul>
	<b>Long lasting design</b>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
	<b>Long lasting design</b>	<ul style="list-style-type: none"> <li>• Brand statement: “While LS&amp;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.”</li> </ul>
	<b>Repair &amp; Care</b> <b>Reuse &amp; Repurpose</b>	<ul style="list-style-type: none"> <li>• <b>in-store Tailor Shops</b> at flagship stores around the globe: people can bring their denim to be repaired or repurposed, extending the life of the garments</li> </ul>
	<b>Second hand</b>	<ul style="list-style-type: none"> <li>• <a href="#">Levi's® Authorized Vintage</a>, 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</li> </ul>
	<b>Upcycling</b>	<ul style="list-style-type: none"> <li>• a <a href="#">collection containing upcycled garments</a> 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</li> </ul>
	<b>Long lasting design</b>	<ul style="list-style-type: none"> <li>• Brand statement:</li> <li>• Product Design: We are continuously implementing and looking for new ways to strengthen the durability of our products.</li> <li>• 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.</li> </ul>

	<b>Long lasting design</b>	<ul style="list-style-type: none"> <li>• Timeless design and long-term wearability as opposed to fast fashion are key when developing its own-label brands</li> <li>• Focus on a standard range with basic models, supplemented by only <b>two new collections of selected seasonal pieces each year</b></li> </ul>
<b>REWE</b>	<b>Upcycling</b>	<ul style="list-style-type: none"> <li>• Bags made out of Penny workers uniforms and sold to Penny staff; profits went to charity</li> </ul>
	<b>Long lasting design</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• <a href="#">Páramo Lifetime Guarantee</a></li> </ul>
	<b>Repair &amp; Care</b>	<ul style="list-style-type: none"> <li>• <a href="#">Páramo's Repairs &amp; Alterations Service</a></li> </ul>
	<b>Second hand</b>	<ul style="list-style-type: none"> <li>• <a href="#">Paramo Recycled eBay store</a></li> </ul>
<b>ROTAUF</b>	<b>Long lasting design</b>	<ol style="list-style-type: none"> <li>1. Selection of sustainable materials</li> <li>2. Physical longevity of materials</li> <li>3. Emotional longevity: our products tell a story and customers therefore love them for a long time</li> <li>4. Aesthetic longevity: simple and timelines design</li> </ol>
	<b>Repair &amp; Care</b>	<ul style="list-style-type: none"> <li>• Repair service that is used well by customers</li> </ul>
	<b>Long lasting design</b>	<ul style="list-style-type: none"> <li>• 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."</li> <li>• <a href="#">Forever yours</a>: tips for a long product life</li> </ul>
	<b>Repair &amp; Care</b>	<ul style="list-style-type: none"> <li>• <a href="#">Repair Index</a>: tool to evaluate the reparability of VAUDE products</li> <li>• Vaude Repair Service: inhouse repair workshop, product can be sent in</li> <li>• <a href="#">Collaboration Vaude and - Ifixit</a>: do it yourself repair instructions</li> <li>• <a href="#">Repair Cafes</a></li> <li>• <a href="#">Care and repair guide</a></li> </ul>
	<b>Second hand</b>	<ul style="list-style-type: none"> <li>• <a href="#">ebay Second Use Shop</a></li> </ul>
	<b>Renting</b>	<ul style="list-style-type: none"> <li>• Shareconomy <a href="#">iRentit</a>: tents, mattresses, backpacks, trolleys and bike bags can be rented online, in Vaude stores in Germany and at the headquarters in Tettngang.</li> </ul>
<b>Upcycling</b>	<ul style="list-style-type: none"> <li>• <a href="#">eBay Upcycling Store</a>: Residual materials that accumulate at our manufacturers are auctioned off for a good cause.</li> <li>• Upcycling Workshop</li> <li>• <a href="#">Facebook Community</a></li> </ul>	

**Table 4: More detailed information on closing the loop**

Brand Name	Programmes or policies on closing the loop	
	Circular design	<ul style="list-style-type: none"> <li>• 100% recyclable shoes, <a href="#">Futurecraft.Loop</a> and <a href="#">Ultraboost DNA Loop</a> Planned release 2021</li> </ul>
	Use of recycled materials	<ul style="list-style-type: none"> <li>• 71% recycled polyester</li> </ul>
	Recycling Target	<ul style="list-style-type: none"> <li>• 100% recycled polyester from 2024 onward</li> </ul>
	Products containing recycled materials	<ul style="list-style-type: none"> <li>• <a href="#">Primegreen</a> and <a href="#">Primeblue</a></li> </ul>
	Use of recycled material	<ul style="list-style-type: none"> <li>• Started using recycled cotton in 2019, no info on amount</li> </ul>
	Recycling Target	<ul style="list-style-type: none"> <li>• 50% of synthetic materials from recycled fibers by 2030</li> </ul>
	Products containing recycled materials	<ul style="list-style-type: none"> <li>• A jacket made with wadding fiber obtained from recycled PET bottles</li> <li>• Products made with “Eco-Recycle” Denim, made with regenerated cotton fibre</li> </ul>
	Circular design	<ul style="list-style-type: none"> <li>• Training for creative teams</li> </ul>
	Products containing recycled materials	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
	Circular design	<ul style="list-style-type: none"> <li>• Brought to market more than 4 million pieces of Cradle to Cradle Certified™ apparel (from 2017 to 2019) This includes T-shirts, jeans, and other items..</li> </ul>
	Take-back System	<ul style="list-style-type: none"> <li>• In-Store program including retail markets around the world Amount collected: 1422 metric tons in 2019</li> </ul>
	Products containing recycled materials	<ul style="list-style-type: none"> <li>• Sold 556000 items containing recycled polyester</li> <li>• 116740 items containing recycled cotton in 2019</li> </ul>
	Circular design	<ul style="list-style-type: none"> <li>• 100% of our designers are trained in circular fashion</li> </ul>
	Take-back System	<ul style="list-style-type: none"> <li>• No in store collection, customers can send clothes to PACKMEE Amount collected: 167433 kg between January 2018 and June 2020</li> </ul>
	Use of recycled material	<ul style="list-style-type: none"> <li>• Esprit reports on the percentages of recycled materials used, as follows: 0.1% recycled cotton 16% recycled polyester 18.65% of man-made cellulose made with 30% recycled raw content</li> </ul>

	<b>Recycling Target</b>	<ul style="list-style-type: none"> <li>• Goal achieved in 2020: produced at least 150,000 garments containing at least 20% recycled post-consumer textile fibres</li> </ul>
	<b>Products containing recycled materials</b>	<ul style="list-style-type: none"> <li>• Several products listed under “sustainable styles”, including recycled cotton, recycled polyester, recycled polyamide, cellulose and recycled wool, but the number of products needs to be increased for natural fibres.</li> </ul>
	<b>Take-back System</b>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
	<b>Products containing recycled materials</b>	<ul style="list-style-type: none"> <li>• <b>Recycled Down Jackets: all down and feather comes from the 620000 down jackets collected from customers</b></li> <li>• <b>DRY-EX clothing containing polyester from recycled PET bottles</b></li> <li>• <b>Yarn Fleece Pullovers containing 30% polyester from recycled PET bottles</b></li> </ul>
	<b>Circular design</b>	<ul style="list-style-type: none"> <li>• Goal for 2025: 20% of the entire G-Star RAW collection will be made from Cradle to Cradle Certified™ fabrics</li> </ul>
	<b>Use of recycled material</b>	<ul style="list-style-type: none"> <li>• 10% recycled or mostly recycled fibers in 2020</li> </ul>
	<b>Products containing recycled materials</b>	<ul style="list-style-type: none"> <li>• Several products under sustainable collection</li> </ul>
	<b>Recyclable products</b>	<ul style="list-style-type: none"> <li>• Cradle to Cradle Certified denim fabric</li> <li>• Cradle to Cradle Certified Product range where full product is 100% recyclable</li> </ul>
	<b>Circular design</b>	<ul style="list-style-type: none"> <li>• Circular design guidelines</li> </ul>
	<b>Take back system</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
	<b>Use of recycled material</b>	<ul style="list-style-type: none"> <li>• 5.8% in 2020, however, the breakdown of materials isn't specified</li> </ul>
	<b>Recycling Target</b>	<ul style="list-style-type: none"> <li>• 30% by 2025</li> </ul>

<b>INDITEX</b>	<b>Circular design</b>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
	<b>Take-back System</b>	<ul style="list-style-type: none"> <li>• In 2299 stores in 46 markets Amount collected: 15321 tons in 2019 Amount disposed: Energy recovery cannot exceed 5% of total garments collected</li> </ul>
	<b>Use of recycled material</b>	<ul style="list-style-type: none"> <li>• 7589 tons of items containing recycled materials on the market in 2019</li> </ul>
	<b>Take-back System</b>	<ul style="list-style-type: none"> <li>• In all company stores in Spain and France In selected stores in 6 other European countries</li> </ul>
	<b>Products containing recycled materials</b>	<ul style="list-style-type: none"> <li>• Some products but no specific collection or style found</li> </ul>
	<b>Recyclable products</b>	<ul style="list-style-type: none"> <li>• <a href="#">Wellthread™</a> line, fully recyclable, made from cottonized hemp, recycled jeans, and cotton scraps</li> </ul>
	<b>Products containing recycled materials</b>	<ul style="list-style-type: none"> <li>• A few products made from recycled PET, but no specific collection or style</li> </ul>
<b>LI-NING</b>	<b>No info found</b>	
<b>MANGO</b>	<b>Take-back System</b>	<ul style="list-style-type: none"> <li>• In all company stores in Spain and France In selected stores in 6 other European countries</li> </ul>
	<b>Recycling Target</b>	<ul style="list-style-type: none"> <li>• Aim to use 25% recycled materials in at least 25% of the clothing we sell by 2025</li> </ul>
	<b>Products containing recycled materials</b>	<ul style="list-style-type: none"> <li>• Men's suit made from 100% recycled materials</li> </ul>
<b>M&amp;S</b>	<b>Take-back System</b>	<ul style="list-style-type: none"> <li>• In 287 stores Amount collected: 1.8 million garments in 2019/20 Mainly through UK and ROI partnership with Oxfam</li> </ul>
	<b>Recycling Target</b>	<ul style="list-style-type: none"> <li>• Aim to use 25% recycled materials in at least 25% of the clothing we sell by 2025</li> </ul>
	<b>Products containing recycled materials</b>	<ul style="list-style-type: none"> <li>• Men's suit made from 100% recycled materials</li> </ul>

	<p>No info found</p>	
	<p>Take-back System</p>	<ul style="list-style-type: none"> <li>• Only for some shoes in North America and Europe</li> </ul>
	<p>Use of recycled material</p>	<ul style="list-style-type: none"> <li>• Less than 1% recycled cotton</li> <li>• 26% recycled polyester</li> <li>• 94% rubber</li> <li>• 1% Ethylene-Vinyl Acetate (EVA) Foam</li> </ul>
	<p>Products containing recycled materials</p>	<ul style="list-style-type: none"> <li>• Some examples: <ul style="list-style-type: none"> <li>• <a href="#">Vapormax 2020</a> made with at least 50% recycled content by weight.</li> <li>• Footwear collection "<a href="#">Space Hippie</a>"s Flyknit yarn is made from 85-90% recycled content, including plastic bottles, t-shirts, and post-industrial scraps. <a href="#">Flyleather</a> is made with at least 50% recycled leather fiber, combined with synthetic materials</li> </ul> </li> </ul>
<p>PRIMARK</p>	<p>Take back system</p>	<ul style="list-style-type: none"> <li>• In the UK only, 190 stores</li> </ul>
	<p>Circular design</p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
	<p>Take-back System</p>	<ul style="list-style-type: none"> <li>• Pilot in Hong Kong</li> </ul>
	<p>Products containing recycled materials</p>	<ul style="list-style-type: none"> <li>• <a href="#">First Mile</a> collection made from recycled plastic bottles.</li> </ul>
<p>VALENTINO</p>	<p>No info found</p>	
	<p>Products containing recycled materials</p>	<ul style="list-style-type: none"> <li>• Bedding made from recycled PET bottles</li> </ul>
	<p>Recyclable products</p>	<ul style="list-style-type: none"> <li>• Pilot project recyclable shoe</li> </ul>
	<p>Take-back System</p>	<ul style="list-style-type: none"> <li>• More than 500 sales outlets</li> </ul>
	<p>Products containing recycled materials</p>	<ul style="list-style-type: none"> <li>• Some textile products with the "Oecoplan" label</li> </ul>

	Take-back System	<ul style="list-style-type: none"> <li>In 46% of stores in Germany</li> </ul>
	Products containing recycled materials	<ul style="list-style-type: none"> <li>Blankets made out of used workers uniforms, were donated for a good cause</li> </ul>
	Circular design	<ul style="list-style-type: none"> <li>See recyclable products below</li> </ul>
	Recyclable products	<ul style="list-style-type: none"> <li>Pilot project with Cradle-to-Cradle-Products, collection with shirts, nightwear, and bedding</li> </ul>
	Take-back System	<ul style="list-style-type: none"> <li>623 collection containers in 2019</li> <li>Reuse: 57 %</li> <li>Recycling: 33 %</li> <li>Other use: 10 %</li> </ul>
	Products containing recycled materials	<ul style="list-style-type: none"> <li>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.</li> <li>Bags were made out of Penny workers uniforms and sold to Penny staff, profit went to a charity</li> </ul>
	Take-back System	<ul style="list-style-type: none"> <li>Products collected by FairWertung not in Tchibo stores</li> </ul>
	Products containing recycled materials	<ul style="list-style-type: none"> <li>some products with recycled PET bottles</li> <li>fibres from textile waste and fishing nets</li> </ul>
	Take-back System	<ul style="list-style-type: none"> <li>Trial in UK in 2019 in 86 stores</li> <li>Amount collected: over 100 tonnes</li> </ul>
	Products containing recycled materials	<ul style="list-style-type: none"> <li>uniforms made from 100% recycled polyester</li> <li>Some products with some recycled polyester</li> </ul>
	Take-back System	<ul style="list-style-type: none"> <li>In brand stores and retailers</li> <li>Repaired and refurbished items are sold at the <a href="#">Paramo recycled Ebay store</a></li> </ul>
	Recyclable products	<ul style="list-style-type: none"> <li>All Paramo products are suited for textile-to textile recycling, since they are not made out of mixed materials, but of 100% polyester</li> </ul>
	Circular design	<ul style="list-style-type: none"> <li>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</li> <li>Each product has a closed loop score</li> </ul>
	Take-back System	<ul style="list-style-type: none"> <li>Looking for a bigger brand to partner with</li> </ul>
	Recyclable products	<ul style="list-style-type: none"> <li>Use of mono-materials makes recycling possible</li> </ul>



### 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:

PROGRESS REPORT ON CHEMICAL MANAGEMENT, SUMMARY APRIL 2019 [https://www.adidas-group.com/media/filer\\_public/ac/b1/acb125e2-3eeb-49ff-aa58-e06a124a4829/april\\_2019\\_progress\\_report\\_on\\_chemical\\_management.pdf](https://www.adidas-group.com/media/filer_public/ac/b1/acb125e2-3eeb-49ff-aa58-e06a124a4829/april_2019_progress_report_on_chemical_management.pdf)

2021 Global Factory List  
[https://www.adidas-group.com/media/filer\\_public/79/29/7929a07f-662c-4b1c-90b7-b348ae-1c08f3/02052021\\_adidas\\_global\\_supplier\\_list.xlsx](https://www.adidas-group.com/media/filer_public/79/29/7929a07f-662c-4b1c-90b7-b348ae-1c08f3/02052021_adidas_global_supplier_list.xlsx)

Website: End-of-Life  
<https://www.adidas-group.com/en/sustainability/products/end-of-life/>

Annual Report 2020  
<https://report.adidas-group.com/2020/en/servicepages/downloads/files/annual-report-adidas-ar20.pdf>

### (2) Benetton:

PFCs Elimination Progress December 2019:  
[http://static.benettongroup.com/wp-content/uploads/2020/02/Benetton\\_PFCs\\_Elimination\\_Progress\\_Dec\\_2019.pdf](http://static.benettongroup.com/wp-content/uploads/2020/02/Benetton_PFCs_Elimination_Progress_Dec_2019.pdf)

APEOs Elimination Progress December 2019  
[http://assets.benettongroup.com/wp-content/uploads/2020/02/Benetton\\_APEOs\\_Elimination\\_Progress\\_Dec\\_2019.pdf](http://assets.benettongroup.com/wp-content/uploads/2020/02/Benetton_APEOs_Elimination_Progress_Dec_2019.pdf)

Phthalates Investigation Report December 2019  
[http://assets.benettongroup.com/wp-content/uploads/2020/07/Benetton\\_Phthalates\\_Investigation-Report\\_Dec\\_2019.pdf](http://assets.benettongroup.com/wp-content/uploads/2020/07/Benetton_Phthalates_Investigation-Report_Dec_2019.pdf)

2019 Wastewater Analysis  
<http://assets.benettongroup.com/wp-content/uploads/2020/07/2019-Wastewater-Analysis.pdf>

Website: ZDHC - Detox  
<http://www.benettongroup.com/sustainability/detox/zdhc/>

Integrated Report 2019  
<http://assets.benettongroup.com/wp-content/uploads/2020/07/Bilancio-Integrato-13.07-ING-pag-dop-pie-1.pdf>

Benetton wet process suppliers map  
<http://www.benettongroup.com/manufacturers-and-wet-process-suppliers-map/>

Suppliers List  
[https://bggren-dunebuggysrl.netdna-ssl.com/wp-content/uploads/2021/03/Benetton\\_Suppliers\\_List-20201.pdf](https://bggren-dunebuggysrl.netdna-ssl.com/wp-content/uploads/2021/03/Benetton_Suppliers_List-20201.pdf)

Website: Wet Process - Detox  
<http://www.benettongroup.com/sustainability/detox/wet-process/>

Benetton Group srl Restricted Substances List, October 2020  
[http://assets.benettongroup.com/wp-content/uploads/2020/12/RSL\\_2020\\_en.pdf](http://assets.benettongroup.com/wp-content/uploads/2020/12/RSL_2020_en.pdf)

Website: Sustainable Materials  
<http://www.benettongroup.com/sustainability/products/sustainable-materials/>

### (3) Burberry:

Burberry Annual Report 2019/20  
[https://www.burberryplc.com/content/dam/burberry/corporate/oar/2020/pdf/Burberry\\_Annual\\_Report\\_2019-20.pdf](https://www.burberryplc.com/content/dam/burberry/corporate/oar/2020/pdf/Burberry_Annual_Report_2019-20.pdf)

Website: Chemical Management  
<https://www.burberryplc.com/en/responsibility/policies/environment/chemical-management.html>

BURBERRY CHEMICAL MANAGEMENT PROGRAMME 2020 UPDATE, Dec 2020  
[https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility\\_docs/Policies\\_statements/Chemical\\_Management/2020/Burberry%20Chemical%20Management%20Report%202020.pdf](https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility_docs/Policies_statements/Chemical_Management/2020/Burberry%20Chemical%20Management%20Report%202020.pdf)

Chemical Elimination Progress Review, Dec 2018  
[https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility\\_docs/Policies\\_statements/Chemical\\_Management/2018/Chemical%20Elimination%20Progress%20Review.pdf](https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility_docs/Policies_statements/Chemical_Management/2018/Chemical%20Elimination%20Progress%20Review.pdf)

Effluent testing trend analysis, Sept 2020  
[https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility\\_docs/Policies-and-Commitments-assets/Effluent%20Testing%20Trend%20Analysis%20-%20Oct%20Apr%2019.pdf](https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility_docs/Policies-and-Commitments-assets/Effluent%20Testing%20Trend%20Analysis%20-%20Oct%20Apr%2019.pdf)

Burberry Annual Report 2019/20  
[https://www.burberryplc.com/content/dam/burberry/corporate/oar/2020/pdf/Burberry\\_Annual\\_Report\\_2019-20.pdf](https://www.burberryplc.com/content/dam/burberry/corporate/oar/2020/pdf/Burberry_Annual_Report_2019-20.pdf)

Website: Econyl  
<https://uk.burberry.com/search/?query=econyl>

#### **(4) C&A**

C&A Sustainability Report 2019  
<https://sustainability.c-and-a.com/uk/en/sustainability-report/fileadmin/pdf-sustainability/generate/global-sustainability-report2019/en/global-sustainability-report2019-en.pdf>

Website: In-Store-Actions  
<https://sustainability.c-and-a.com/uk/en/sustainability-report/2019/sustainable-lives/enabling-customers/in-store-actions/>

#### **(5) Esprit**

Esprit Sustainability Report 2020  
[https://www.esprit.com/\\_Resources/Persistent/1/4/f/b/14f-b28e7655b4cc60f70dcc77170d8568aa6d7d7/Esprit%20Sustainability%20Report%20FY1920%20EN.pdf](https://www.esprit.com/_Resources/Persistent/1/4/f/b/14f-b28e7655b4cc60f70dcc77170d8568aa6d7d7/Esprit%20Sustainability%20Report%20FY1920%20EN.pdf)

Website: Transparency  
<https://www.esprit.com/en/company/sustainability/produce-responsibly/transparency>

Website: Environment  
<https://www.esprit.com/zh/company/sustainability/produce-responsibly/environment>

IPE Green Supply Chain Map  
<http://www.ipe.org.cn/MapBrand/Brand.aspx?q=6>

#### **(6) Fast Retailing**

Website: Chemical Management  
<https://www.fastretailing.com/eng/sustainability/environment/chemical.html>

Fast Retailing Manufacturing Restricted Substances List (MRSL) -Version 2021-  
[https://www.fastretailing.com/eng/sustainability/environment/pdf/FastRetailingManufacturingRestrictedSubstancesList\\_en.pdf](https://www.fastretailing.com/eng/sustainability/environment/pdf/FastRetailingManufacturingRestrictedSubstancesList_en.pdf)

Progress Report on Chemical Management 2020, January 2020  
<https://www.fastretailing.com/eng/sustainability/environment/pdf/CommitmentProgressReport.pdf>

UNIQLO Core Fabric Mill List  
[https://www.fastretailing.com/eng/sustainability/labor/pdf/UniqloCoreFabricMillList\\_2019Apr.pdf](https://www.fastretailing.com/eng/sustainability/labor/pdf/UniqloCoreFabricMillList_2019Apr.pdf)

Website: Improved Waste Management and Resource Efficiencies  
<https://www.fastretailing.com/eng/sustainability/environment/waste.html>

Website: Contributing to Society through Clothing  
[https://www.fastretailing.com/eng/sustainability/community/donating\\_clothing.html](https://www.fastretailing.com/eng/sustainability/community/donating_clothing.html)

#### **(7) G-Star**

G-STAR RAW DETOX REPORT 2019, February 2020  
[https://img2.g-star.com/image/upload/v01/CSR/PDF/3\\_G-Star\\_RAW\\_DETOX\\_report\\_2019.pdf](https://img2.g-star.com/image/upload/v01/CSR/PDF/3_G-Star_RAW_DETOX_report_2019.pdf)

Website: Pollution  
[https://www.g-star.com/en\\_gb/raw-responsibility-sustainability/planet/pollution](https://www.g-star.com/en_gb/raw-responsibility-sustainability/planet/pollution)

Manufacturing Restricted Substances List (MRSL) for Garments  
[https://img2.g-star.com/image/upload/v01/raw-responsibility/downloads/planet/pollution/4\\_ZDHC\\_MRSL\\_garments\\_2.0.pdf](https://img2.g-star.com/image/upload/v01/raw-responsibility/downloads/planet/pollution/4_ZDHC_MRSL_garments_2.0.pdf)

G-STAR RAW DETOX REPORT 2019, February 2020  
[https://img2.g-star.com/image/upload/v1483974909/CSR/PDF/3\\_G-Star\\_RAW\\_DETOX\\_report\\_2019.pdf](https://img2.g-star.com/image/upload/v1483974909/CSR/PDF/3_G-Star_RAW_DETOX_report_2019.pdf)

Website: Manufacturing Map  
[https://www.g-star.com/en\\_gb/raw-responsibility-sustainability/manufacturing-map](https://www.g-star.com/en_gb/raw-responsibility-sustainability/manufacturing-map)

G-Star Raw Manufacturing list  
[https://img2.g-star.com/image/upload/v01/CSR/G-Star\\_RAW\\_Manufacturing\\_list\\_Dec\\_2020.pdf](https://img2.g-star.com/image/upload/v01/CSR/G-Star_RAW_Manufacturing_list_Dec_2020.pdf)

Website: Circularity  
[https://www.g-star.com/en\\_us/raw-responsibility-sustainability/planet#circularity](https://www.g-star.com/en_us/raw-responsibility-sustainability/planet#circularity)

Website: Sustainable Materials  
[https://www.g-star.com/en\\_us/rawresponsibility/planet/sustainable-materials](https://www.g-star.com/en_us/rawresponsibility/planet/sustainable-materials)

## **(8) H&M**

Website: Chemicals  
<https://hmgroupp.com/sustainability/circular-and-climate-positive/chemicals/>

H&M Group “Towards Zero Discharge of Hazardous Chemicals” report 2019/2020  
<https://hmgroupp.com/wp-content/uploads/2020/10/Towards-zero-discharge-2019-and-2020-report.pdf>

Discharge Analysis 2019, April 2020  
<https://hmgroupp.com/wp-content/uploads/2020/10/Discharge-Analysis-2019.pdf>

Website: Supply Chain  
<https://hmgroupp.com/sustainability/leading-the-change/transparency/supply-chain/>

Case Study DMFa  
[https://hmgroupp.com/wp-content/uploads/2020/10/Case-Study\\_DMFa-phase-out.pdf](https://hmgroupp.com/wp-content/uploads/2020/10/Case-Study_DMFa-phase-out.pdf)

Towards becoming 100% circular  
<https://hmgroupp.com/wp-content/uploads/2020/10/Towards-becoming-100-percent-circular.pdf>

Website: Recycling and Upcycling  
<https://hmgroupp.com/sustainability/circular-and-climate-positive/recycling/>

HM-Group-Sustainability-Performance-Report-2020, March 2021  
<https://hmgroupp.com/wp-content/uploads/2021/03/HM-Group-Sustainability-Performance-Report-2020.pdf>

Website: Circularity and our value chain  
<https://hmgroupp.com/sustainability/circular-and-climate-positive/circularity/>

## **(9) Inditex**

INDITEX PROGRESS REPORT ON THE DETOX COMMITMENT FOR 2020, June 2018  
<https://www.wateractionplan.com/documents/177327/558146/Inditex+Progress+Report+on+the+DETOX+Commitment+for+2020.+June+2018.pdf/1efb0cd7-2c76-04bc-f123-78d6fdd67c65>

WASTE WATER ANALYSIS REPORT. May 2018  
[https://www.wateractionplan.com/documents/177327/558146/Waste+water+analysis+report\\_May+2018.pdf/2860323f-e799-2978-bf6b-542165a4d00f](https://www.wateractionplan.com/documents/177327/558146/Waste+water+analysis+report_May+2018.pdf/2860323f-e799-2978-bf6b-542165a4d00f)

INTRODUCTION THE INDITEX MRSL, May 2016  
<https://www.wateractionplan.com/documents/177327/558146/Introduction+to+Inditex+Manufacturing+Restricted+Substance+List.pdf/a5deca39-09feb870-133e-cf584f6d41a5>

Website: Inditex Manufacturing Restricted Substance List (MRSL)  
<https://www.wateractionplan.com/documents/177327/558146/Inditex+Manufacturing+Restricted+Substance+List+%28MRSL%29.xlsx/b6bf2f50-375bf0b6-ac70-28e2812aab98>

Annual Report 2019  
<https://www.inditex.com/documents/10279/645708/2019+Inditex+Annual+Report.pdf/25aa68e3-d7b2-bc1d-3dab-571c0b4a0151>

ADVANCES IN THE SUBSTITUTION OF PHTHALATES STUDIES TOWARDS THE SUBSTITUTION OF ORTHOPHTHALATES IN PLASTISOLS  
<https://www.wateractionplan.com/documents/177327/558146/STUDIES+TOWARDS+THE+SUBSTITUTION+OF+ORTHO-PHTHALATES+IN+PLASTISOLS.pdf/b5149ce4-a421-0004-4e16-d75ff0aa6126>

## **(10) Levis**

Honoring our 2020 Commitment to Zero Discharge of Hazardous Chemicals

[https://www.levistrauss.com/wp-content/uploads/2021/01/2020-ZDHC-UPDATE-FINAL-WITH-LETTERHEAD\\_updated.pdf](https://www.levistrauss.com/wp-content/uploads/2021/01/2020-ZDHC-UPDATE-FINAL-WITH-LETTERHEAD_updated.pdf)

LEVI STRAUSS & CO. 2019 ANNUAL REPORT

[https://s23.q4cdn.com/172692177/files/doc\\_financials/2019/ar/873914\\_007\\_BMK\\_WEB%5b4%5d.pdf](https://s23.q4cdn.com/172692177/files/doc_financials/2019/ar/873914_007_BMK_WEB%5b4%5d.pdf)

2019 Sustainability Review

<https://www.levistrauss.com/wp-content/uploads/2020/07/LSCo.-2019-Sustainability-Review.pdf>

## **(11) Limited Brands - Victoria's Secret & Co is now a separate company, as of 1st August 2021**

Website: Supply Chain

<https://www.victoriasecretandco.com/corporate-responsibility/environment/water/supply-chain>

Tier 1 apparel suppliers list

<https://www.victoriasecretandco.com/static-files/9b5a7775-c904-4269-a945-bbfbb25ff2d9>

## **(12) LiNing**

Environmental Social and Governance Report 2019

[http://ir.lining.com/en/csr/csr\\_reports/csr\\_report\\_2019.pdf](http://ir.lining.com/en/csr/csr_reports/csr_report_2019.pdf)

## **(13) Mango**

MANGO DETOX 2016-2017 RESULTS

[https://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/10.RESULTS\\_2016-2017.pdf](https://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/10.RESULTS_2016-2017.pdf)

Manufacturing Restricted Substances List (M-RSL), April 2018

[https://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/4.MRSL\\_april\\_2018.pdf](https://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/4.MRSL_april_2018.pdf)

MANGO DETOX 2017-2018 ROADMAP

[https://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/11.ROADMAP\\_2017-2018.pdf](https://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/11.ROADMAP_2017-2018.pdf)

Website: Detox Project

<http://frontphp.ext.pre.mango.com/web/oi/servicios/company/rsc/detox.php>

MANGO FACTORY LIST

<https://staticpages.mngbcn.com/edits/FW20/MANGORSC2020/assets/pdfs/Fabricas-IN.pdf?rand=236486731212>

Sustainability Report 2019

[https://staticpages.mngbcn.com/edits/FW20/SI-TEEMPRESA2020/assets/pdfs/MNG-mem-in-2020\\_name=mem2020IN.pdf?rand=1204105776042](https://staticpages.mngbcn.com/edits/FW20/SI-TEEMPRESA2020/assets/pdfs/MNG-mem-in-2020_name=mem2020IN.pdf?rand=1204105776042)

## **(14) M&S**

Website: RESPONSIBLE CHEMICALS MANAGEMENT

<https://corporate.marksandspencer.com/sustainability/clothing-and-home/product-standards/responsible-chemicals-management>

Website: Wet processing facilities

<https://corporate.marksandspencer.com/sustainability/clothing-and-home/product-standards/responsible-chemicals-management#9f9f104fb2684f16b42c6d3b8d792d47>

M&S interactive map

<https://interactivemap.marksandspencer.com/>

M&S ECP Minimum Standards Factory, Self Audit for Textile Wet Processor -Chinese March 2021

[https://corporate.marksandspencer.com/documents/m-and-s-ecp-minimum-standards-factory-self-audit-for-textile-wet-processor\\_chinese\\_0121\\_v3.0.pdf](https://corporate.marksandspencer.com/documents/m-and-s-ecp-minimum-standards-factory-self-audit-for-textile-wet-processor_chinese_0121_v3.0.pdf)

Website: Circular Economy in Action: <https://corporate.marksandspencer.com/sustainability/business-wide/waste-and-circular-economy#68ba8b41c5ef4b3bbf3c9a-8437124cad>

Website: Plan A Shwopping

<https://www.marksandspencer.com/c/plan-a-shwopping>

Website: M&S BRINGS BACK SHWOPPING

<https://corporate.marksandspencer.com/media/press-releases/5e0f046f7880b21924350282/m-and-s-brings-back-shwopping-making-sustainable-shopping-easier>

Website: OUR APPROACH TO SUSTAINABLE FASHION

<https://corporate.marksandspencer.com/sustainability/quick-reads/our-approach-to-sustainable-fashion>

2020 Plan A Report

<https://corporate.marksandspencer.com/documents/reports-results-and-publications/plan-a-reports/2020/plan-a-report-2020.pdf>

## (15) Miroglio

Website: Miroglio Group Detox page  
<https://www.mirogliogroup.com/en/detox-commitment/>

MANUFACTURING RESTRICTED SUBSTANCES LIST VERSION JANUARY 2018

Miroglio Fashion s.r.l.  
[https://www.mirogliogroup.com/wp-content/uploads/2019/07/miroglio-group\\_detox-commitment\\_2018.01-Miroglio-SPA-Manufacturing-Restricted-Substances-List.pdf](https://www.mirogliogroup.com/wp-content/uploads/2019/07/miroglio-group_detox-commitment_2018.01-Miroglio-SPA-Manufacturing-Restricted-Substances-List.pdf)

Website  
Stamperia di Govone Water Analysis on plants  
Sublitex Water Analysis on plants (Stamperia Transfer)  
[https://www.mirogliogroup.com/wp-content/uploads/2019/07/miroglio-group\\_detox-commitment\\_2019.04-Stamperia-di-Govone-Water-Analysis-on-plants-1.pdf](https://www.mirogliogroup.com/wp-content/uploads/2019/07/miroglio-group_detox-commitment_2019.04-Stamperia-di-Govone-Water-Analysis-on-plants-1.pdf)

Press release  
<https://www.mirogliogroup.com/newsroom/oltre-punta-sullupcycling/>

## (16) Nike

FY19 Nike Impact Report  
<https://s3-us-west-2.amazonaws.com/purpose-cms-preprod01/wp-content/uploads/2020/04/10225416/FY19-Nike-Inc.-Impact-Report.pdf>

Nike Manufacturing Map  
<http://manufacturingmap.nikeinc.com/>

2020 Chemistry Playbook  
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