

19 March 2015

# **DETOX CATWALK:**

# Company assessments for Detox Leaders and Greenwashers

# **Detox Leaders**

## **Adidas**

**Summary:** Adidas is congratulated for delivering on its commitment, made in June 2014, to ensure that 99% of its wet processing suppliers in China publish data on their discharges of hazardous chemicals on the global online platform IPE.

- Elimination of APEOs and phthalates: Adidas communicates its ban on the use of APEOS and phthalates to its global supply chain and now needs to show auditing reports to verify the elimination of these hazardous chemicals.
- Elimination of PFCs: Adidas is committed to the elimination of 99% of PFC use<sup>1</sup> by end of 2017 and has already achieved its first target of eliminating 90% of PFCs.<sup>2</sup>
- Transparency: Adidas has delivered on its commitment, made in June 2014, to ensure that 99% of its wet processing supply chain facilities in China report data publicly on the global online platform IPE. It also publishes its list of suppliers and encourages facilities to divulge their respective customers when reporting data.

Adidas now needs monitor its progress towards the elimination of APEOs, phthalates and PFCs in its products and its supply chain facilities and report back on progress. To achieve the goal of zero emission by 2020 it also needs to fully implement the elimination of all 11 groups of priority chemicals through its system of chemicals management.

# Adidas details:

- Adidas is committed to key principles such as the 'Precautionary Principle' and 'Zero
  Discharges' but to implement them fully it will need to use the best current testing
  technology to continuously reduce the detection limits for hazardous chemicals in its
  products as well as discharges and emissions from its supply chain facilities.
- It is reporting on the progress that is being made towards its commitment in updates to its Individual Action Plan which is accountable at a corporate level.
- The rapid progress that has been made on transparency has been particularly encouraging and needs to be maintained to ensure that supply chain facilities beyond China begin full public disclosure of their data on hazardous chemical discharges.

# Sources

Dialogue with brands following the announcement of the second Detox Catwalk



- Adidas Detox commitment 2011, 26 August 2011<sup>3</sup>
- Adidas Detox commitment 2014, 11 June 2014; Chemical management progress at the adidas Group<sup>4</sup>
- The adidas Group Individual Roadmap Toward Zero Discharge of Hazardous Chemicals, 18th November 2011<sup>5</sup>
- Adidas chemical footprint website<sup>6</sup>
- Progress Report on adidas Group Individual Roadmap towards Zero Discharge of Hazardous Chemicals, Updated June 2014<sup>7</sup>
- Progress Report on Chemical Management Summary, 3<sup>rd</sup> December 2014<sup>8</sup>
- Adidas corporate website, Product and consumer safety<sup>9</sup>
- Adidas Restricted Substances List (A-01 Group Policy for the Control and Monitoring of Hazardous Substances)<sup>10</sup>
- Communication to suppliers on APE/APEO, March 15 2012<sup>11</sup>
- Adidas lists of suppliers<sup>12</sup>

## **Benetton**

**Summary:** Benetton is in the **Leaders** group because of its actions, and is congratulated on its delivery on transparency, by publishing data on the discharge of hazardous chemicals from its individual supply chain facilities in both China and the Global South on the global online platform IPE; this information can be accessed directly from Benetton's website, for each individual facility, an example of best practice.

- **Elimination of APEOs and phthalates:** Benetton has ensured that its ban on the use of APEOs and phthalates is communicated to its global supply chain
- **Elimination of PFCs:** Benetton has a commitment to eliminate all PFCs by December 2015; it has communicated its intentions to its global supply chain.
- Transparency: Benetton has ensured that supply chain facilities representing 50% of its production in China report data on their discharge of hazardous chemicals on the IPE database; it has a new target to disclose data from more than 80% of its supply chain by 2017. Benetton also publishes the names of its individual supply chain facilities on its website, with a link to the relevant part of the IPE database.

Greenpeace applauds Benetton for integrating the precautionary and zero discharge principles across all of its supply chain decisions; it needs to continue to progress towards the elimination of hazardous chemicals and use continuous monitoring to check compliance, with the results published on its global website.

#### **Further details:**

Benetton was among the first group of brands to deliver on their commitments on
transparency, by publishing data on the discharge of hazardous chemicals from its individual
supply chain facilities in both China and the Global South on a global online platform. It has
recently committed to a new target of disclosing data from more than 80% of its supply
chain by 2017.



- Its programme for implementing important principles such as the 'Precautionary Principle' and 'Right to Know' is credible and its Action Plan has corporate accountability and is regularly updated. It is committed to achieving 'Zero Discharges' based on intrinsic hazard and specifies the use of the best current testing technology. It has also developed an individual priority list of hazardous chemicals based on these principles, which includes the requirement for sampling to use the 'best current testing technology'.
- Benetton is committed to the complete *elimination* of PFCs in all of its products. It has
  published a report on its investigation into APEO use; it communicates its usage ban for the
  11 priority chemical groups. It also has a credible target for eliminating hazardous
  substances beyond the 11. It was among the first brands to publish case studies
  demonstrating the substitution of hazardous chemicals with safer alternatives.

#### Sources

- Dialogue with companies following the announcement of the second Detox Catwalk
   Benetton corporate website<sup>13</sup>
- BENETTON GROUP'S DETOX COMMITMENT, 17 January 2013
- Benetton Restricted Substances List June 201315 and December 2014<sup>16</sup>
- Data on audits of individual suppliers, Benetton website, September 2013<sup>17</sup>
- Case studies on substitution of hazardous chemicals<sup>18</sup>
- APEOs investigation report as of July 2013<sup>19</sup>
- Benetton Detox Commitment Progress Update (January 2015)<sup>20</sup>
- Benetton Audit Reports on IPE Platform<sup>21</sup>

# **Burberry**

**Summary:** Burberry made its' commitment to Detox in January 2014 and has already made significant progress delivering on its commitment; its' reporting of the progress being made is transparent and thorough. It has already ensured the publication of data from a significant proportion of its supply chain on the discharge of priority hazardous chemicals.

- **Elimination of APEOs and phthalates:** Burberry has communicated its ban on APEOs and phthalates to its suppliers and is monitoring to test compliance in its products and its discharges from manufacturing.
- **Elimination of PFCs:** Burberry is committed to eliminate PFCs by July 2016; it has communicated this ban to its suppliers and has conducted testing which "demonstrates positive progress in the transition of water repellent finishing away from PFCs."
- **Transparency:** All of its supply chain facilities based in China have published their emissions of hazardous chemicals on the online IPE Detox platform, together with supply chain facilities in other countries, representing 68% of its wet processing capacity so far; this is due to increase to 80% as a result of testing that has already been initiated.



Greenpeace encourages Burberry to continue with its thorough implementation of its Detox Commitment and to ensure continuous progress towards 'Zero Discharges' by using 'best current testing techniques' to reduce the levels of hazardous chemicals in its products and discharges.

#### **Further details:**

- The commitment made by Burberry ensures the application of the 'Precautionary Principle' through the use of the best current testing technology to achieve zero discharges.
- Burberry has published a Manufacturing Restricted Substances List based on intrinsic hazard, which includes all of the 11+ chemical groups and identifies restricted chemicals beyond this list; however, it needs to implement lower restriction limits for manufacturing inputs to achieve zero discharges.
- Burberry is on track for delivering on its commitment to publish discharge data from 80% of its global supply chain.

#### Sources

- Dialogue with brands following the announcement of the second Detox Catwalk
- Main webpage for Burberry Commitment to Chemical Management in Manufacturing.<sup>22</sup>
- Burberry Commitment to Chemicals Management in Manufacturing, 28<sup>th</sup> January 2014.<sup>23</sup>
- Burberry Action Plan webpage with links to various elements the most useful are listed below.<sup>24</sup>
- Burberry supply chain screening and management process, April 2014.<sup>25</sup>
- Burberry Water Testing Summary for 25% global production, June 2014.<sup>26</sup>
- Alkylphenols and phthalates investigation report, October 2014<sup>27</sup> and chemical elimination target update.<sup>28</sup>
- Burberry Manufacturing Restricted Substances List and Addendum.<sup>29</sup>
- Burberry Product Restricted Substances List.<sup>30</sup>
- Burberry Annual Progress Review.<sup>31</sup>

# C&A

**Summary:** C&A is in the **Leaders** group because of its actions, and is congratulated for its elimination of PFCs ahead of schedule and for substantially reviewing its Detox Individual Action Plan.

- **Elimination of APEOs and phthalates:** C&A does not allow the use of APEOs or phthalates in its products; this is communicated on its website and to its global supply chain.
- **Elimination of PFCs:** C&A committed to eliminate the use of PFCs by January 2015 and has delivered on this commitment. It reports that it is implementing PFC-free solutions and that all products sold after January 2015 are free from PFCs. <sup>32</sup>
- **Transparency:** C&A states that 42 of its suppliers have reported data on their discharges of hazardous chemicals on the global online platform IPE.<sup>33</sup>



Greenpeace encourages C&A to apply the precautionary and zero discharge principles by using the best current testing technology to assess the presence of hazardous chemicals in effluent and products, and to implement these via a credible tool – such as an individual Manufacturing-RSL - in order to completely eliminate hazardous chemicals from its supply chain.

#### **C&A** details:

- On principles, C&A was the first brand to substantially review its Detox Individual Action Plan, following its early commitment to Detox in 2011. It has a programme for implementing the 'Precautionary Principle' and 'Right to Know' and its updated Action Plan has corporate accountability. It is committed to achieving 'Zero Discharges' based on intrinsic hazard and specifies the use of the best current testing technology (in contrast to the collective ZDHC Group JRM, of which it is also a member), although it still needs to develop an individual priority list of hazardous chemicals for manufacturing based on these principles. It has met its clear deadlines for delivery on transparency and PFCs.
- C&A has clear deadlines for the delivery of its commitments on *transparency* and has begun the disclosure process to ensure publication of data on the discharge of hazardous chemicals from its individual supply chain facilities on the global online platform IPE; it must extend this to more than 80% of its supply chain and specify that the data it publishes should be chemical by chemical.
- C&A is committed to the complete *elimination* of PFCs in all of its products by 2015 and informed Greenpeace this it implemented this well ahead of schedule. It reports the findings of its investigation into APEO use. It has not yet committed to publish case studies demonstrating the substitution of hazardous chemicals with safer alternatives and it has not specified a date for the elimination of further hazardous chemicals.

# Sources

- Dialogue with companies following the announcement of the second Detox Catwalk
- C&A Commitment to Zero Discharges, 21 November 2011<sup>34</sup>
- C&A Updated C&A Individual Action Plan, 16 November 2012<sup>35</sup>
- C&A chemicals management webpage 'Acting to eliminate hazardous chemicals' includes updates on action plan
- C&A product safety webpage 'Product commitments C&A Europe', information about RSL<sup>37</sup>
- C&A Restricted Substances List 2014.<sup>38</sup>
- C&A product commitments C&A Europe<sup>39</sup>
- C&A Corporate Responsibility Report 2014, p.28<sup>40</sup>
- C&A Europe reduces use of hazardous chemicals in its supply chain, update 2015<sup>41</sup>

# **Esprit**

**Summary:** Esprit is in the **Leaders** group because of its actions, and is congratulated for disclosing data on the discharge of hazardous chemicals from its supply chain in China and Bangladesh which is reported on the global online platform IPE.



- Elimination of APEOs and phthalates: Esprit states that it bans the intentional use of APEOs and that phthalates have been banned for many years; this policy is enforced through new contract language with its global supply chain.
- **Elimination of PFCs:** Esprit has eliminated PFCs from its products ahead of schedule and reports that by doing this "54.3 tons/year of PFC based chemistry" has been removed from its supply chain.
- **Transparency:** Esprit has monitored the discharges of hazardous chemicals from its core supply chain facilities in China and Bangladesh and reports that 42% of these are also reporting their data on the global online platform IPE. Esprit continues to increase the public reporting of wet processing facilities across its global supply chain.

Esprit is congratulated for its transparent reporting of hazardous chemical discharges by its suppliers to its own operations; it needs to continue making progress towards the progressive elimination of hazardous chemicals in its products and manufacturing.

#### **Further details:**

- Esprit's original Detox commitment had a programme for implementing important principles such as the 'Precautionary Principle' and 'Right to Know' with an Action Plan which has corporate accountability. It is committed to achieving 'Zero Discharges' based on intrinsic hazard and using the best current testing technology and will use this approach to create its priority list of hazardous chemicals
- On *transparency*, data from 33 suppliers in China and 1 in Bangladesh, representing its core suppliers, has been published on IPE, however, it's not clear what percentage of its total supply chain is represented by these suppliers.
- It has not reported on an investigation into the use of APEOs from its supply chain facilities although Esprit does state that it has enforced its APEO ban.
- It has not documented the elimination of PFCs and other hazardous substances by publishing case studies demonstrating the substitution of hazardous chemicals with safer alternatives.

#### Sources

- Dialogue with brands following the announcement of the second Detox Catwalk
- Esprit Agreement with Greenpeace, included Individual Action Plan, 7 December 2012<sup>42</sup>
- Esprit Corporate website<sup>43</sup>
- Esprit releases Detox agreement update<sup>44</sup> with background<sup>45</sup>

# **Fast Retailing**

**Summary:** Fast Retailing, the company name behind the Uniqlo brand, is in the **Leaders** group because of its actions, and is congratulated on its delivery on transparency, by publishing data on the discharge of hazardous chemicals from 80% of its global supply chain facilities, on the global online platform IPE.



- Elimination of APEOs and phthalates: Fast Retailing has reinforced its ban on APs/APEOs and includes phthalates and PVC on its restricted list for suppliers.
- Elimination of PFCs: It is also on track to eliminate PFC by its deadline of June 2016, having met its targets to eliminate C7 & C8 PFCs.
- Transparency: Fast Retailing has ensured the publication of data on the discharge of hazardous chemicals from 80% of its global supply chain facilities, on the global online platform IPE.

Fast Retailing's support for implementing the best screening methodology for selecting chemicals based on intrinsic hazard is a positive influence the global Detox process. Greenpeace applauds Fast Retailing for integrating the precautionary and zero discharge principles across all of its supply chain decisions; it needs to ensure the use of the best current testing technology to assess the presence of hazardous chemicals in effluent and products, to be implemented via a credible tool, in order to completely eliminate hazardous chemicals from its supply chain.

#### **Further details:**

- Fast Retailing is a pioneer on *transparency* as the first brand to commit to disclose and to deliver data from the majority of its supply chain. It is also one of the first brands to publish data on the discharge of hazardous chemicals from its individual supply chain facilities on the global online platform IPE.
- Its programme for implementing important principles such as the 'Precautionary Principle' and 'Right to Know' is credible and its Action Plan has corporate accountability and is regularly updated. It is committed to achieving 'Zero Discharges' based on intrinsic hazard. It needs to specify the use of the best current testing technology in its individual priority list of hazardous chemicals based on these principles.
- On *elimination* Fast Retailing has published its report on its investigation into APEO use and reinforced its ban. It has committed to the complete elimination of PFCs in all of its products. It lists the 11 priority chemical groups in its Restricted Substances List, as well as some other hazardous substances beyond the 11. It was among the first brands to publish case studies demonstrating the substitution of hazardous chemicals with safer alternatives.

- Dialogue with companies following the announcement of the second Detox Catwalk
- FAST RETAILING Greenpeace Detox Solution Commitment and Individual Action Plan, 9
  January 2013<sup>46</sup>
- Progress of the initiatives (January 15<sup>th</sup> 2015)<sup>47</sup>
- The Hazardous Chemicals Screening Methodology<sup>48</sup>
- APEO Investigation Results (June 28th, 2013)<sup>49</sup>
- Fast Retailing Discloses its Restricted Substances List (April 30th, 2013)<sup>50</sup>
- Fast Retailing Announces Further Steps Following January Greenpeace Detox Solution Agreement (March 5th, 2013)<sup>51</sup>
- Case study on subsport.org<sup>52</sup>



# **G-Star**

**Summary:** G-Star is in the **Leaders** group because of its actions, and is congratulated on its delivery on transparency. It leads the way on transparency by also publishing details of all of its suppliers on an interactive map and has ensured the publication of data on the discharge of hazardous chemicals from the majority of its individual supply chain facilities in both China and the Global South on the global online platform IPE. .<sup>53</sup>

- elimination of APEOs and phthalates: G-Star is making significant progress on the elimination of priority hazardous chemicals; it has communicated its ban on APEOs and phthalates to its suppliers; it investigates compliance through monitoring of its products and reports progress on its website.
- **Elimination of PFCs:** It has started implementing PFC-free alternatives for most of its products, in line with its commitment to eliminate PFCs by December 2014 and will be continuing its testing programme to verify this.

# Transparency:

G-Star publishes data from its individual supply chain facilities representing at least 80% of its global supply chain on the global online platform IPE. It also publishes discharge data from supply chain facilities on its global website and discloses its list of suppliers on its online manufacturing map covering 95% of its production volume.

G-Star needs to fully integrate the use of 'best current testing technologies' in its chemicals monitoring programme, including in its Restricted Substances Lists, to ensure the detection of hazardous chemicals in effluent and products and their complete elimination from its supply chain.

## **Further details:**

- G-Star was among the first group of brands to deliver on their commitments on
   transparency, to ensure the publication of data on the discharge of hazardous chemicals
   from its individual supply chain facilities on the global online platform IPE. It has now
   fulfilled its commitment to disclose data from more than 80% of its supply chain.
- Its programme for implementing important principles such as the 'Precautionary Principle' and 'Right to Know' is credible and its Action Plan has corporate accountability and is regularly updated. It is committed to achieving "Zero Discharges" based on intrinsic hazard and specifies the use of the best current testing technology; it has developed an individual priority list of hazardous chemicals based on intrinsic hazard and now needs to implement the use of best current testing technology.
- G-Star is making progress on its goal to eliminate APEOs and phthalates in its products, with product monitoring showing that just over 1% of products<sup>54</sup> still contain these substances.
- G-Star is committed to the complete *elimination* of PFCs in all of its products and has started implementing PFC-free alternatives in its global supply chain; it has published its report on



its investigation into APEO; it has banned the use of the 11 priority chemical groups and some hazardous chemicals beyond these 11 in its Manufacturing Restricted Substances List, although some limits for chemical formulations need to be lower. It has a credible target for eliminating hazardous substances beyond the 11. It was among the first brands to publish case studies demonstrating the substitution of hazardous chemicals with safer alternatives and has published new case studies.

## **Sources**

- Dialogue with companies following the announcement of the second Detox Catwalk
- G-Star Responsible Supply Chain website, 1.5 Zero Discharge of Hazardous Chemicals<sup>55</sup>
- G-Star Greenpeace Detox Solution Commitment 29 January 2013<sup>56</sup>
- G-Star March 2013, Development of an Intrinsic Hazard Screening Methodology<sup>57</sup>
- G-Star, August 2013, WATER DISCHARGE REPORT 1<sup>58</sup> and WATER DISCHARGE REPORT 2<sup>59</sup>
- G-Star RAW March 2013, Steps to develop further substitution case studies<sup>60</sup>
- Case studies on Subsport.com<sup>61</sup> and published on G-Star website: PFCs, APEOs and phthalates<sup>62</sup>
- G-Star Manufacturing Restricted Substances List, October 2014<sup>63</sup> and Product Restricted Substances List, November 2014.<sup>64</sup>
- G-Star Progress Report 2014 on Detox Commitment.<sup>65</sup>

# H&M

**Summary:** H&M is in the **Leaders** group because of its actions, and is congratulated for being the first company to eliminate the hazardous chemicals PFCs from its products. It has also disclosed data on the discharge of hazardous chemicals by its strategic suppliers on the global online platform IPE, starting a disclosure process for its entire supply chain.

- Elimination of APEOs and phthalates: H&M has banned the use of APEOs and phthalates
  during manufacturing. This has been communicated to its global supply chain and it now
  needs to publish its monitoring of products and processes to verify their elimination
  through its global supply.
- **Elimination of PFCs:** H&M reported the **elimination** of PFCs in all of its products as from January 2013, representing 4,708,797 products.
- Transparency: H&M is delivering its commitments on transparency by publishing data on the discharge of hazardous chemicals from its suppliers on the global online platform IPE; data from 47 suppliers has been published as of 2014, representing 44% of its global supply chain. It intends to extend this disclosure of data from the supply chain to other platforms in Global South countries.

Greenpeace encourages H&M to apply the 'Precautionary' and 'Zero Discharge' principles by using the 'best current testing technology' to assess the presence of hazardous chemicals in effluent and products, which will need to be implemented via a credible tool, in order to completely eliminate hazardous chemicals from its supply chain. H&M could further influence the global Detox process by implementing the best screening methodology for selecting chemicals based on intrinsic hazard.



## **H&M** details:

- H&M has implemented its commitment to phase out the 11 priority hazardous chemical
  groups by including all these chemical groups in its Restricted Substances List for
  manufacturing, and includes chemical groups beyond the 11 priority hazardous chemicals in
  its usage ban. It needs to update its' approach to the phase out of other hazardous
  chemicals beyond 2014.
- On principles, it has a credible programme for implementing the 'Precautionary Principle' and 'Right to Know'. Its Detox Individual Action Plan has corporate accountability and has been recently updated and reviewed. It is committed to achieving 'Zero Discharges' based on intrinsic hazard and uses this approach to create its priority list of hazardous chemicals; however, it needs to specify the use of the best current testing technology.

#### **Sources**

- Dialogue with companies following the announcement of the second Detox Catwalk
- H&M launch webpage on ZDHC.<sup>66</sup>
- H&M's Commitment to Zero Discharge of Hazardous Chemicals, 20 September 2011<sup>67</sup>
- H&Ms additional Individual Action Plan, 18 December 2011<sup>68</sup>
- AP/APEO investigation, summary report, December 2011.<sup>69</sup>
- Discharge Data report (pilot benchmark study), February 2013<sup>70</sup> and H&M Discharge Data report, February 2014.<sup>71</sup>
- List of Suppliers.<sup>72</sup>
- H&M puts ban on PFCs, 4<sup>th</sup> September 2012.<sup>73</sup>
- Chemical Trial Analysis, summary report, May 2013.
- Manufacturing Restricted Substances List, May 2014<sup>75</sup>
- Approved alternatives to PFCs, October 2013.<sup>76</sup>
- Chemical strategy 2015 1016<sup>77</sup> and chemical management roadmap.<sup>78</sup>
- H&M Conscious Actions Sustainability Report 2013<sup>79</sup>

# Inditex

**Summary:** Inditex is in the **Leaders** group because of its actions, and is congratulated on its thorough approach, which includes progress on the elimination of hazardous chemicals such as PFCs and delivery on transparency, by publishing data on the discharge of hazardous chemicals from its individual supply chain facilities in both China and the Global South on a global online platform. Greenpeace also applauds Inditex for conducting its own tests on the dye formulas provided by chemical suppliers to its manufacturing supply chain.

- Elimination of APEOs and phthalates: Inditex has communicated its ban on the use of APEOs and phthalates to its global supply chain, is conducting monitoring of emissions and reporting its findings.
- Elimination of PFCs: Inditex has confirmed that "all clothing, shoes and accessories marketed by Inditex, are free from any use of PFCs in the production process" as from



2014.80

• Transparency: Inditex has ensured the publication of data on the discharge of priority hazardous chemicals from its supply chain facilities in China, the Global South and the Global North on the global online platform IPE. It also provides a direct link to IPE Detox discharge reports from its website. Inditex has published on its website a study on the analysis and testing results of the discharge data of 102 mills from China, Bangladesh and India.

Greenpeace congratulates Inditex for thoroughly integrating the 'Precautionary and 'Zero Discharge' principles across all of its supply chain decisions; it will ensure the use of the best current testing technology to assess the presence of hazardous chemicals in effluent and products, which has been implemented via a credible tool, in order to completely eliminate hazardous chemicals from its supply chain.

#### **Further details:**

- Inditex's programme for implementing important principles such as the 'Precautionary
  Principle' and 'Right to Know' is credible and its Action Plan has corporate accountability and
  is regularly updated. It is committed to achieving 'Zero Discharges' based on intrinsic hazard
  and using the best current testing technology and has used this approach to create its
  priority list of hazardous chemicals.
- Inditex is a Pioneer on *transparency* as the first brand to commit to publish data on the discharge of hazardous chemicals from 100 of its individual supply chain facilities. Inditex has made good progress on its programme by reporting credible discharge data and has ensured the publication of this information on the IPE global online platform; many of its suppliers beyond the 100 facilities identified have voluntarily reported their discharge data on IPE.
- On *elimination* it has investigated the use of APEOs as well as the other 10 priority hazardous chemicals from its supply chain facilities and enforced its usage ban on these chemicals; it has delivered on its commitment to eliminate PFCs and has published a case study demonstrating the substitution of hazardous chemicals with safer alternatives.

- Dialogue with companies following the announcement of the second Detox Catwalk
- Inditex Responsible Manufacturing Zero Discharge Pledge webpage<sup>81</sup>
- Inditex, Achieving the Zero Discharge and Individual Action Plan, 29<sup>th</sup> November 2012<sup>82</sup>
- Updated Individual Action Plan, February 2013<sup>83</sup>
- Inditex website: engaging with supply chain capacity building –phase 2 results<sup>84</sup>
- Inditex, Master plan for water management in the supply chain<sup>85</sup> see engaging with our supply chain for M-RSL<sup>86</sup>
- Inditex Clear to Wear standard (Product-RSL)<sup>87</sup>
- Case studies on Subsport.org<sup>88</sup>



# **Levi Strauss**

**Summary:** Levi Strauss is in the **Leaders** group because of its delivery on its promises. It is to be congratulated for its delivery on transparency, by publishing data on the discharge of hazardous chemicals from its individual supply chain facilities in both China and the Global South and starting a disclosure process for its entire supply chain.

- Elimination of APEOs and phthalates: Levi's has communicated its ban on the use of APEOs and phthalates to its global supply chain, and continues to check on implementation.
- **Elimination of PFCs:** It is committed to the elimination of all PFCs, which due to be completed by the end of 2015 and is working on developing alternatives.
- Transparency: Levi's has published data on the discharge of hazardous chemicals from its 41 individual supply chain facilities in both China and the Global South, with the discharge information available on its website; data from some of these facilities is now also published on the global platform IPE. It also publishes its global list of suppliers.

Greenpeace applauds Levi's for integrating the 'Precautionary' and 'Zero Discharge' principles across all of its supply chain decisions; it needs to ensure the use of the best current testing technology to assess the presence of hazardous chemicals in effluent and products, to be implemented via a credible tool, in order to completely eliminate hazardous chemicals from its supply chain to the lowest level possible.

#### **Further details:**

- Levi's is committed to achieving 'Zero Discharges' based on intrinsic hazard and using the
  'best current testing technology'; it needs to ensure its commitment to zero is reflected in its
  detection limits. It will use the best screening methodology to create its priority list of
  hazardous chemicals
- LS & Co is a pioneer on *transparency* as it was the first brand to publish data (on its' website) on the discharge of hazardous chemicals from its individual supply chain facilities.
   LS & Co has made good progress on its programme on reporting discharge data, but it still needs to commit to disclose data on the discharge of hazardous substances from at least 80% of its global supply chain.
- On *elimination*, it has investigated the use of APEOs from its supply chain facilities and
  further enforced its APEO ban; it has credible commitments on eliminating PFCs and other
  hazardous substances via usage bans and now needs to ensure lower detection limits that
  would lead to its complete elimination. It has not yet published case studies demonstrating
  the substitution of hazardous chemicals with safer alternatives.

- Dialogue with companies following the announcement of the second Detox Catwalk
- Levi Strauss & Co. Greenpeace Detox Solution Commitment, December 12, 2012<sup>89</sup>
- LS & Co, Chemical use and discharge facility reports, May 2013<sup>90</sup>
- LS & Co P-RSL November 2014 and Restricted Substances Stewardship Programme (& M-RSL) December 2014<sup>91</sup>



- LS & Co APEO investigation report, April 2013<sup>92</sup>
- LS & Co Intrinsic hazard screening methodology<sup>93</sup>
- LS & Co progress on ZDHC commitment 2014<sup>94</sup>

# **Limited Brands**

**Summary:** Limited Brands is in the **Leaders** group because of its actions, in particular the progress it is making on publishing data on the discharge of hazardous chemicals by its individual suppliers on a global online platform.

- Elimination of APEOs and phthalates: Limited Brands communicates its ban on the usage of APEOs and phthalates on its website and directly to its global supply chain through a "coordinated supplier engagement and communication strategy". 95
- Elimination of PFCs: Limited Brands has a commitment to eliminate all PFCs by July 2015 which it communicates on its website and directly to its global supply chain through a "coordinated supplier engagement and communication strategy". 96
- Transparency: Limited Brands has published baseline data on the discharge of priority hazardous chemicals representing 90% of its global supply chain, available on its website; approximately 40% of its Chinese mills are also publishing data on the global online platform IPE, representing about 30% of its global supply chain.

To completely eliminate hazardous chemicals from its supply chain Limited Brands needs to assess the presence of hazardous chemicals in effluent and products using the best current testing technology, as agreed in its commitment to the precautionary and zero discharge principles. Greenpeace continues to encourage Limited Brands to deliver on its promises on the 'Precautionary Principle', the 'Right to Know' and 'Zero Discharges' and expects it to demonstrate its Detox credentials through on the ground implementation.

# **Further details:**

- Its programme for implementing important principles such as the 'Precautionary Principle'
  and 'Right to Know' is credible and its Action Plan has corporate accountability and is
  regularly updated. It is committed to achieving 'Zero Discharges' based on intrinsic hazard
  and specifies the use of the best current testing technology. It will develop an individual
  priority list of hazardous chemicals based on these principles.
- Limited Brands is still working towards delivery of its commitments on *transparency*, to publish data on the discharge of hazardous chemicals from its individual supply chain facilities on a global online platform. It has made a commitment to disclose data from more than 80% of its supply chain.
- Limited Brands is committed to the complete *elimination* of PFCs in all of its products, however it needs to communicate more clearly and transparently (via its Restricted



Substances Lists) to its global supply chain that its ban is on all PFCs. It is due to publish its report on its investigation into APEO use shortly.

#### **Sources**

- Dialogue with companies following the announcement of the second Detox Catwalk
- LIMITED BRANDS Greenpeace Detox Solution Commitment and Individual Action Plan, 22 January 2013<sup>97</sup>
- LIMITED BRANDS corporate website water manufacturing 98
- Limited Brands baseline data 2013<sup>99</sup> and 2014,<sup>100</sup> reports on supply chain facility discharges
  of priority hazardous chemicals
- LIMITED BRANDS corporate website policies restricted substances<sup>101</sup>

# Mango

**Summary:** Mango is in the **Leaders** group because of its actions. It is to be congratulated for its delivery on transparency, by ensuring the publication of data on the discharge of hazardous chemicals from its individual supply chain facilities in both China and the Global South on the global online platform IPE and starting a disclosure process for its entire supply chain. It is also delivering on its plan to eliminate PFCs.

- Elimination of APEOs and phthalates: Mango has communicated its ban on APEOs and phthalates to its global supply chain and is monitoring its products and discharges from its supply chain to ensure continued improvements.
- Elimination of PFCs: Mango has already substituted all PFCs and eliminated their use in products as of 2013; it reports that levels found in discharges from its supply chain continue to reduce.
- Transparency: Mango has ensured that approximately 39% of its global supply chain in China, India and Turkey, has disclosed data on the discharge of hazardous chemicals on the global online database IPE; it will be expanding its reporting of wastewater discharges to Vietnam and Bangladesh.

Greenpeace applauds Mango for integrating the 'Precautionary' and 'Zero Discharge' principles across all of its supply chain decisions; it will ensure the use of the 'best current testing technology' to assess the presence of hazardous chemicals in effluent and products, to be implemented via a credible tool, in order to completely eliminate hazardous chemicals from its supply chain.

## **Further details:**

- Mango's programme for implementing important principles such as the 'Precautionary
  Principle' and 'Right to Know' is credible and its Action Plan has corporate accountability and
  is regularly updated. It is committed to achieving 'Zero Discharges' based on intrinsic hazard
  and using the 'best current testing technology' and will use this approach to create its
  priority list of hazardous chemicals
- On transparency Mango is a pioneer as the first company to publish data on the discharge of



hazardous chemicals from its individual supply chain facilities via a global online platform. Mango has made good progress on its programme on reporting discharge data and must aim to disclose data on the discharge of hazardous substances from at least 80% of its global supply chain.

 It has already achieved the *elimination* of PFCs from its products and has credible commitments on eliminating other hazardous substances; it has not yet published case studies demonstrating the substitution of hazardous chemicals with safer alternatives.

#### **Sources**

- Dialogue with companies following the announcement of the second Detox Catwalk
- Mango Detox Solution Commitment and Individual Action Plan 2012, 4/12/2012<sup>102</sup>
- Mango Detox Project page:<sup>103</sup>
- Introduction (latest Action Plan);<sup>104</sup>
- Screening Methodology;<sup>105</sup>
- Product Restricted Substances List;<sup>106</sup>
- Manufacturing Restricted Substances List<sup>107</sup>;
- Case Study.<sup>108</sup>
- Mango Detox Project: statement on the progress and roadmap, 2015<sup>109</sup>

# M&S

**Summary:** *M&S* is in the *Leaders* group because of its actions, in particular Greenpeace applauds *M&S* for ensuring the publication of data on the discharge of hazardous chemicals by its individual suppliers on the global online platform IPE; it is on track to ensure that 80% of its dyehouses in China (by turnover) publish their discharge data.

- Elimination of APEOs and phthalates: M&S is delivering on the elimination of hazardous chemicals such as APEOs and phthalates which it has communicated to its global supply chain. It has reported the results of its investigation into the use of APEOs.
- Elimination of PFCs: M&S is committed to total PFC elimination in textiles by 1st July 2016. It has delivered on the elimination of C8 PFCs and continues to communicate with its suppliers about its phase out of all PFCs.
- Transparency: M&S has ensured the publication of data on the discharge of hazardous chemicals by its suppliers on the global online platform IPE. It has extended the number of dyehouses that have now taken part in the public disclosure initiative to 52 this currently represents 56% of M&S global turnover and 76% of M&S Chinese turnover, in line with its new objective to report data from 80% of dyehouses in China (by turnover) by June 2015.

Greenpeace continues to encourage M&S to deliver on its promises on the 'Precautionary Principle', the 'Right to Know' and 'Zero Discharges' and expects it to demonstrate its Detox credentials through on the ground implementation.



#### **Further details:**

- M&S was a pioneer when its original Commitment was adopted, as the first brand to set an *elimination* date for all PFCs and for including all the key principles in its Commitment. M&S has a usage ban on phthalates in its Manufacturing-RSL, however, it needs to clarify its elimination of phthalates in final products cover all products range, not only those intended for children (as outlined in its Product-RSL).
- It must implement the 'Precautionary' and 'Zero Discharge' principles by specifying the 'best current testing technology' to verify zero discharges and reduce the acceptable limits for formulations used in manufacturing and in the final product.
- M&S includes chemicals beyond the 11 priority groups in its Restricted Substances Lists.

#### Sources:

- Dialogue with companies following the announcement of the second Detox Catwalk
- M&S webpage and December 2014 update<sup>110</sup>
- M&S AGREEMENT WITH GREENPEACE (including Individual Action Plan), 24 October 2012<sup>111</sup> (note, no longer available on M&S website)
- Case Study: Substitution of phthalates from childrenswear prints, March 2013<sup>112</sup>
- M&S investigation into APEOs, March 2013<sup>113</sup>
- Restricted Substances List and Manufacturing-RSL, November 2014<sup>114</sup>
- M&S ECP Minimum standards; due diligence for chemical compliance, May 2014<sup>115</sup>

# **Primark**

**Summary:** Primark is in the **Leaders** group because of its actions, and is congratulated for enforcing its ban on priority hazardous chemicals as well as for reporting on its investigations into their use in its supply chain.

- **Elimination of APEOs and phthalates:** Primark has committed to re-enforce its ban on APEOs and phthalates and has communicated to its global supply chain that they are highest priority chemicals for elimination.
- **Elimination of PFCs:** Primark has a commitment to eliminate all PFCs across its global supply-chain by December 2015 and is communicating these restrictions with its global supply chain.
- Transparency: Primark has disclosed data on the discharge of hazardous chemicals from its supply chain facility, starting with its main production hub in China; this data, which represents 18% of its wet processing suppliers in China, is published on the global online platform IPE, and is on track to meet its target to publish data from 80% of its global supply chain by June 2015.

Primark has also published three case studies which document the substitution of priority hazardous



chemicals with safer alternative. Primark has had to revise some of its original targets but continues to make good progress on the reporting of data from its supply chain and the elimination of hazardous chemicals. Greenpeace encourages Primark to apply the precautionary and zero discharge principles by using the best current testing technology to assess the presence of hazardous chemicals in effluent and products, to be implemented by a credible tool, to completely eliminate the discharge of hazardous chemicals by its supply chain facilities by 2020.

#### **Further details:**

- Since making its Detox commitment in February 2014, Primark has followed through with the publication of three case studies on the substitution of APEOs, PFCs and chlorophenols with safer alternatives.
- Primark has completed an investigation into the current compliance of all the priority 11 chemical groups to gather insight on the most effective approach to support elimination and the phase-in of safer alternative chemicals.
- In order to fully implement its commitment to the 'Precautionary Principle' and 'Zero Discharges', Primark needs to ensure the use of 'best current testing technologies' and intrinsic hazard for selecting hazardous chemicals for future action; it is planning to develop an individual priority list of hazardous chemicals for manufacturing which needs to be based on these principles.

#### **Sources**

- Dialogue with companies following the announcement of the second Detox Catwalk
- Primark main webpages for manufacturing/hazardous chemicals.
- Primark press release about Detox Commitment<sup>117</sup> and update.<sup>118</sup>
- Primark Detox commitment 2014.<sup>119</sup>
- Primark Restricted Substances List. 120
- Pilot study investigation into six mills in China, July 2014.
- Case study NPEOs,<sup>122</sup> also published on Subsport.<sup>123</sup>
- Case study PFCs (PFOA). 124
- Case study chlorophenols & chlorobenzenes<sup>125</sup>
- Primark Detox Roadmap, 2015<sup>126</sup>

# **Puma**

**Summary:** Puma is in the **Leaders** group because of its actions, in particular the progress it has made on its plan to report data on the discharge of hazardous chemicals by its individual suppliers on the global online platform IPE. Greenpeace also appliands Puma committing to the substitution and elimination of PFCs for 100% of its products.

• Elimination of APEOs and phthalates: Puma has communicated its ban on APEOs and phthalates to its global supply chain using a credible tool; on phthalates, it has had a policy not to use PVC (which can contain phthalates) for many years.



- **Elimination of PFCs:** Puma recently committed to eliminate PFCs in 100% of its products by the end of 2017, with an interim target of eliminating long chain PFCs by January 2015.
- **Transparency:** Puma reports that it has met its commitment to publish data on the discharges of hazardous chemicals from 80% of its supply chain, which is published on the global online platform IPE.

Puma is applying the 'Precautionary' and 'Zero Discharge' principles by agreeing to use the 'best current testing technology' to assess the presence of hazardous chemicals in effluent and products, which it has already implemented for APEOs; this will need to be extended to other hazardous chemicals via a credible tool, in order to completely eliminate them from its supply chain. Puma could further influence the global Detox process by implementing the best screening methodology for selecting chemicals based on intrinsic hazard, as it has indicated. Greenpeace continues to encourage Puma to deliver on its promises on the 'Precautionary Principle', the 'Right to Know' and 'Zero Discharges' and expects it to demonstrate its Detox credentials through on the ground implementation.

#### **Puma details:**

- Puma was the original pioneer the first brand to commit to Detox, in July 2011. It made a renewed Detox Commitment in November 2014. Its' implementation programme is now on course to deliver some of necessary steps towards its overall Detox target.
- On *transparency* Puma has now committed to the delivery of disclosure data from its supply chain facilities in China and the Global South to represent more than 80% of its supply chain.
- On principles Puma has indicated that it is ready for an approach based on 'no
  environmentally acceptable levels of hazardous chemicals' which requires the 'best current
  testing technology' to be used to assess their presence in effluent and products. It has
  already implemented this in relation to APEOs, as shown by the 2012 revision of its
  environmental Handbook, which incorporates its Detox commitments and specifies the best
  current detection limit for APEOs; this approach must be applied to all hazardous chemicals.
- On *elimination* Puma's renewed Detox Commitment includes the elimination of all PFCs in 100% of its products by the end of 2017. It has also published a case study documenting its substitution of hazardous chemicals with safer alternatives.

- Dialogue with companies following the announcement of the second Detox Catwalk
- Puma is committed to eliminate discharges of hazardous chemicals (DeTox Commitment),
   July 26<sup>th</sup> 2011<sup>127</sup>
- Puma Detox webpage<sup>128</sup>
- Renewed Detox Commitment, 21st November 2014<sup>129</sup>
- Puma Chemicals Management webpage<sup>130</sup>
- PUMA Roadmap towards Zero Discharge of Hazardous\* Chemicals (IAP of Sep-2011 and IAPv2 of Dec-2011)<sup>131</sup>
- Puma Handbook of Environmental Standards 2012, Chemicals Management<sup>132</sup>
- Restricted Substances List v.6 2014<sup>133</sup>&Puma/ZDHC Manufacturing Restricted Substances List 2013.<sup>134</sup>



- Business and Sustainability Report 2012<sup>135</sup>
- Puma Statement; Phase out of Long-Chained Fluorinated Chemicals, 5 March 2013<sup>136</sup>
- Puma Public Factory List<sup>137</sup>

# **Valentino**

**Summary:** Valentino Fashion Group is in the **Leaders** group of Detox brands and is congratulated for its exemplary investigations into the use and discharge of priority hazardous chemicals by its supply chain facilities and the comprehensive actions it is taking as a result; its transparent reporting shows encouraging progress towards zero discharges of hazardous chemicals as a result of the actions that it has taken.

- Elimination of APEOs and phthalates: Valentino is making significant progress on its commitment to eliminate APEOs and phthalates; its' ban is communicated clearly to its global supply chain and it has a monitoring programme which identifies priorities for reduction. Its monitoring of discharges from its supply chain shows that levels of APEOs are declining as a result.
- Elimination of PFCs: Valentino has delivered on its plan to eliminate PFCs by the end of 2015 ahead of schedule. It states that it can "reasonably claim that no finished products contain above mentioned PFCs" and that measurable progress has been made towards their elimination in its supply chain.
- Transparency: Valentino has published data on the discharge of priority hazardous chemicals from 100% of its global supply chain at its official website with significant details and analysis; it is also encouraging its supply chain facilities to report directly on the global online platform IPE.

Greenpeace congratulates Valentino for ensuring the use of the best testing technology to verify zero, which is implemented via a credible tool, in order to progress towards the elimination of all 11 priority chemical groups from its supply chain and its products. Valentino could further influence the global Detox process by using the best screening methodology for selecting chemicals based on intrinsic hazard.

# **Further details:**

- Valentino Fashion Group is in the *Leaders* group of Detox brands, as a result of its ambitious commitments, its leadership on ensuring the best testing technology to verify zero, and its delivery ahead of schedule on eliminating PFCs.
- Valentino was the first brand to specify the use of the 'best current testing technology' in its
  communications with its supply chain and is committed to achieving 'Zero Discharges' based
  on intrinsic hazard to create its priority list of hazardous chemicals. It is also a leader for its
  commitment to important principles such as the 'Precautionary Principle' and 'Right to
  Know' and its credible programme for implementing them. It has an Action Plan that has
  corporate accountability and is regularly updated.



- Dialogue with companies following the announcement of the second Detox Catwalk
- Valentino Corporate website, <sup>138</sup> with links to the following
- Valentino Fashion Group Detox Solution Commitment 06 February 2013 v1---6 139
- Valentino Fashion Group, RSL audit process 2013<sup>140</sup>
- VFG Product Restricted Substances List<sup>141</sup>
- VFG Manufacturing Restricted Substances List <sup>142</sup>
- VFG APEO Investigation<sup>143</sup> and APEO Investigation report November 2014<sup>144</sup>
- VFG PFCs Investigation report, December 2014<sup>145</sup>
- VFG Phthalates Investigation report, December 2014<sup>146</sup>
- VGF Supply Chain Reporting and Monitoring, November 2014<sup>147</sup>

# **Greenwashers**

# Nike

**Summary:** Nike falls into the **Greenwashers** category because of the fundamental credibility gaps in its Detox programme; over three years after its commitment and despite numerous exchanges with Greenpeace, it has refused to fully acknowledge its individual corporate responsibility to Detox. It has not yet taken concrete steps to fulfil its promise to its individual Detox commitment and it has especially fallen short by failing to set a deadline for the elimination of all PFCs. Nike has made little progress in disclosing its suppliers' pollution information on the IPE Detox platform. Greenpeace has repeatedly asked Nike to uphold its commitments; however, there is no evidence of tangible results delivered from Nike.

- Elimination of APEOs and phthalates: Nike communicates to its global supply chain that APEOs and phthalates are to be eliminated through a credible tool; it needs to publish results from monitoring its products and discharges from manufacturing to demonstrate progress towards their elimination.
- Elimination of PFCs: Nike has no targets for the elimination of the hazardous chemicals PFCs by a specified date and their substitution with safer alternatives; it still does not have a credible plan with termination dates for PFCs or any hazardous chemicals leading up to the 2020 detox goal.
- Transparency: Nike has not publicly disclosed the number and percentage of its suppliers that publish data on their discharges of hazardous chemicals on the global online database IPE, despite several requests from Greenpeace. Nike states that it is "partnering with the Institute of Public and Environmental Affairs (IPE) on their Green Choice Alliance program"; this is not the same as disclosing Detox data. Nike is conducting pilot studies to evaluate tools for disclosure. 148

Despite putting considerable resources into its chemicals programme over many years, its perpetual development of multiple tools and processes has failed to deliver real changes on the ground on the key issues that are the focus of the Detox campaign. To implement its promise to act according to the precautionary principle Nike needs to commit to a clear and ambitious timeline to substitute all PFCs



in all its products; it also needs to show that it is serious about delivering on the Right to Know by starting a credible, progressive and public disclosure of hazardous chemical discharges based on the direct testing data of its suppliers discharge pipes.

Instead of working with urgency to eliminate hazardous chemicals Nike has become an obstacle to progress with its lack of credible individual action to deliver on the commitments of the Detox movement, and promotion of a 'smokescreen' of tools and pilot projects. Greenpeace urges Nike to acknowledge its individual corporate responsibility and start delivering on its Detox commitments.

#### **Further details:**

- Nike falls into the *Greenwashers* category as it fails on two of the Detox criteria and has not lived up to its promises. Although it is acting on the elimination of phthalates and APEOs through its individual Restricted Substances List, on PFCs Nike still does not take individual corporate responsibility and is hiding behind the collective agreement and implementation plan of the ZDHC Group, which it uses as its main defence for not taking action on PFCs. The ZDHC Group agreement and implementation does not hold Nike accountable because it is based on collective action taken by a group of brands.
- On *transparency*, although Nike was the first to adopt a 'Right to Know' commitment, this was not sufficient as it doesn't specify the transparent release of data on the discharge of hazardous chemicals by its supply chain, which needs to be chemical by chemical. It has now accepted the need for its global supply chain to disclose data on the release of hazardous chemicals but it has not yet delivered on this publicly. Despite making a clear Detox commitment to some key principles, the 'Precautionary Principle', 'Right to Know' and 'Zero Discharges', for example, it has rejected the key requirements to implementing these principles, such as recognising that there are no environmentally acceptable levels of hazardous chemicals and that therefore zero needs to be defined as 'not-detectable, to the limits of current technology'.
- Nike has not set or followed the individual, corporate actions needed to achieve its Detox objectives in a credible way, for example, it has no targets for the *elimination* of certain hazardous chemicals (PFCs) by a specified date.
- At first glance, it would seem that Nike is acting on the basis of the 'Precautionary Principle' in its adoption of a credible screening methodology for the selection of chemicals based on intrinsic hazard, as a result of following through on this point from its Individual Action Plan. Nike is the first brand to have adopted this methodology and implement it via its Chemicals Management Programme. However, this is not implemented in a credible way, as it is put in the context of a "systematic, risk based approach" to reduce toxins, not to eliminate them.<sup>149</sup>

- Dialogue with brands following the announcement of the second Detox Catwalk
- Detox Commitment of 17 Aug 2011<sup>150</sup>
- Nike Roadmap Toward Zero Discharge of Hazardous Chemicals, 18 November<sup>151</sup>
- Nike Corporate website. 152
- Nike Restricted Substances List. 153
- Nike Restricted Substances List update log, October 2014<sup>154</sup>



- Suppliers List see 'manufacturing' 155
- Nike Corporate Responsibility Report, FY 12/13 'Reject Toxics' update on Zero Discharges

# LiNing

**Summary:** *LiNing* still falls into the *Greenwashers* category for its lack of credible action on its Detox commitments. LiNing has recently made a new Detox commitment, acknowledging its individual corporate responsibility to act, however, it still does not commit to the elimination of all PFCs in all of its products.

- Elimination of APEOs and phthalates: LiNing has communicated its ban on APEOs and
  phthalates to its global supply chain via a credible tool. It needs to publish results from
  monitoring its products and discharges from manufacturing to demonstrate progress
  towards their elimination.
- Elimination of PFCs: LiNing has made a new commitment to eliminate PFCs in part of its products and substitute them with safer alternatives, however, it does not go far enough; the commitment is limited to woven products and only 95% of PFCs will be eliminated, leaving 5% remaining.
- Transparency: LiNing has not yet published Detox data from its supply chain; however, it has made a commitment to publish data on the discharge of hazardous chemicals for 50% of its supply chain by the end of June 2015 and 80% by the end of December 2015.

Along with the other **Greenwasher**, LiNing's Detox programme actions are not as good as the progressive actions taken by other brands, which are taking on the Detox challenge to achieve the elimination of hazardous chemicals use and discharges. LiNing has made some progress and still has the opportunity to raise its game and become a Detox Leader. However, it must deliver on its commitments to disclose data on the discharges of hazardous chemicals from its supply chain in 2015 and make a commitment to eliminate all PFCs in all of its products or else the company will remain a **Greenwasher**.

# LiNing details:

- LiNing was a pioneer as the first Chinese brand to commit to zero discharges; unfortunately it has not followed through on this commitment with ambitious, concrete action plans to deliver its promise.
- Despite making a commitment to the 'Precautionary Principle', the 'Right to Know' and 'Zero Discharges', for example, so far it has not followed many of the key requirements to implementing these principles, such as recognising that there are no environmentally acceptable levels of hazardous chemicals and that therefore zero needs to be defined as 'not-detectable, to the limits of current technology'.
- It is undertaking monitoring of its supply chain on the discharge of the 11 priority hazardous chemicals and needs to report on the results. 157



It now needs to deliver on the individual, corporate actions that are necessary to achieve its Detox objectives, for example, ensuring transparency by disclosing data on the release of hazardous chemicals by its suppliers and setting targets for the *elimination* of certain hazardous chemicals (PFCs) by a specified date.

- Dialogue with companies following the announcement of the second Detox catwalk
- LiNing CSR webpage<sup>158</sup>
- LiNing's Commitment to Zero Discharge of hazardous chemicals, November 2011<sup>159</sup>
- LiNing's new Detox Commitment 2015<sup>160</sup>
- LiNing's Restricted Substances List, February 2103<sup>161</sup>
- LiNing's letter to suppliers regarding APEOs, February 2012<sup>162</sup>
- LiNing CSR Report 2013<sup>163</sup>

<sup>&</sup>lt;sup>1</sup> The elimination of all PFCs - as a chemical group - is an essential part of responsible chemical use for all Detox leaders. Adidas is the first Detox committed company which has a significant number of products that are 'high-end outdoors'. As an interim step, adidas has publicly committed to all of their product lines being 99% PFC-free by no later than 31 Dec 2017 as it progresses towards being 100% PFC-free across all product lines as they committed - by no later than 31 Dec 2019. Greenpeace fully expects adidas Group to rapidly reach elimination of 100% of all PFCs and will continue to motivate all companies - including adidas - to deliver on their promises.

<sup>&</sup>lt;sup>2</sup> A journey towards the phase out of PFC http://blog.adidas-group.com/2014/11/a-journey-towards-the-phase-out-ofpfc/

Adidas Detox commitment 2011 http://www.adidas-

group.com/de/medien/newsarchiv/nachhaltigkeits berichte/2011/adidas-groups-commitment-zero-discharge-hazardous-newsarchiv/nachhaltigkeits berichte/2011/adidas-groups-commitment-zero-discharge-hazardous-newsarchiv/nachhaltigkeits berichte/2011/adidas-groups-commitment-zero-discharge-hazardous-newsarchiv/nachhaltigkeits berichte/2011/adidas-groups-commitment-zero-discharge-hazardous-newsarchiv/nachhaltigkeits berichte/2011/adidas-groups-commitment-zero-discharge-hazardous-newsarchiv/nachhaltigkeits berichte/2011/adidas-groups-commitment-zero-discharge-hazardous-newsarchiv/nachhaltigkeits berichte/2011/adidas-groups-commitment-zero-discharge-hazardous-newsarchiv/nachhaltigkeits berichte/2011/adidas-groups-commitment-zero-discharge-hazardous-newsarchiv/nachhaltigkeits berichte/2011/adidas-groups-commitment-zero-discharge-hazardous-newsarchiv/nachhaltigkeits-newsarchiv/nachhachemicals-engl/

<sup>&</sup>lt;sup>4</sup> Adidas Detox commitment 2014, 11 June 2014; Chemical management progress at the adidas Group, http://www.adidas-

group.com/media/filer public/2014/06/11/11062014 chemical management progress at the adidas group

<sup>.</sup>pdf <sup>5</sup> Adidas 2011a. The **adidas Group Individual Roadmap TowardZero Discharge of Hazardous Chemicals** was published 18<sup>th</sup> November 2011

http://www.adidas-group.com/media/filer public/2013/07/31/ag individual roadmap november 18 2011 en.pdf <sup>6</sup> Adidas chemical footprint website; http://www.adidas-group.com/en/sustainability/planet/chemicalfootprint/

<sup>&</sup>lt;sup>7</sup> Adidas, Progress Report on adidas Group Individual Roadmap towards Zero Discharge of Hazardous Chemicals, Updated June 2014

http://www.adidas-group.com/media/filer public/2014/06/10/adidas group progress report -zdhc-

group.com/media/filer public/42/70/427086e0-2e8c-41bf-9b33-

e2fe09887165/progress\_report\_on\_chemical\_management\_adidas\_group.pdf

<sup>&</sup>lt;sup>9</sup> Adidas website, Product and consumer safety:, http://www.adidas-group.com/en/sustainability/products/product-and-

consumer-safety/

10 Adidas Restricted Substances List 2014 (A-01 Group Policy for the Control and Monitoring of Hazardous Substances) http://www.adidas-group.com/media/filer\_public/98/cf/98cf05b1-52f4-44a9-b96a-cfbf83dbc7c8/a-01 sept 2014 handout.pdf

<sup>&</sup>lt;sup>11</sup> Communication to suppliers on APEO/NPE-free preparations, March 15 2012 http://www.adidas-group.com/media/filer public/75/73/75734e62-6a4d-4d41-a26fe8ed5fb1c14c/communication to suppliers on apeo npe-free preparations.pdf



<sup>12</sup> Adidas website, supply chain structure; http://www.adidas-group.com/en/sustainability/supplychain/supply-chain-structure/

<sup>13</sup> Benetton website: http://www.benettongroup.com/sustainability/case-studies and

http://www.benettongroup.com/sustainability/about-our-products

<sup>14</sup> BENETTON GROUP'S DETOX COMMITMENT, 17 January 2013

 $\underline{http://www.benettongroup.com/sites/all/temp/benettongroupdetoxcommitment1.pdf}$ 

<sup>15</sup> Benetton Restricted Substances List June 2013,

http://www.benettongroup.com/sites/all/temp/rsl\_june\_2013\_0.pdf 
Benetton Restricted Substances List December 2014,

http://www.benettongroup.com/sites/all/images/Technical%20Safety%20Specifications%20 2014dec Versio ne%20per%20Web.pdf

<sup>17</sup> Benetton website, see audit test reports for 5 suppliers in China and 5 in Tunisia, September 2013, http://www.benettongroup.com/sustainability/supply-chain

18 Case Study: A biodegradable, protein-based biopolymer to replace acrylic resins and their additives in textile printing (BENETTON - 12/3/2013)

http://www.subsport.eu/case-stories/369-en?lang=

Also see: http://www.benettongroup.com/sustainability/case-studies

<sup>19</sup> APEOs investigation report as of July 2013

http://www.benettongroup.com/sites/all/temp/apeos investigation report july 0.pdf

<sup>20</sup> Benetton Detox Commitment Progress Update (January 2015) http://www.benettongroup.com/Detox-Commitment-Progress-Update

Benetton Audit Reports on IPE Platform; http://www.benettongroup.com/Benetton-audit-reports-on-IPE-**Platform** 

<sup>22</sup> Burberry Commitment to Chemical Management in Manufacturing;

http://www.burberryplc.com/corporate responsibility/burberry-commitment-on-chemical-management-in-

<sup>23</sup> Burberry Commitment to Chemicals Management in Manufacturing, 28<sup>th</sup> January 2014;

http://www.burberryplc.com/documents/action-plan/burberry-commitment-on-chemical-management-in-

manufacturing.pdf 2

24 Burberry Action Plan – webpage; <a href="http://www.burberryplc.com/corporate\_responsibility/burberry-">http://www.burberryplc.com/corporate\_responsibility/burberry-</a> commitment-on-chemical-management-in-manufacturing/burberry-action-plan-on-chemical-management-inmanufacturing

<sup>25</sup> Burberry supply chain screening and management process, April 2014;

http://www.burberryplc.com/documents/action-plan/burberry-supply-chain-screening-and-managementprocess.pdf
26 Burberry Water Testing Summary for 25% global production,

http://www.burberryplc.com/corporate responsibility/burberry-commitment-on-chemical-management-inmanufacturing/effluent-testing?culture=

<sup>27</sup> Burberry, Alkyphenols and phthalates investigation report, October 2014;

http://www.burberryplc.com/documents/action-plan/investigation-report-october-2014 Burberry, chemical elimination target update, October 2014;

http://www.burberryplc.com/documents/action-plan/burberry-target-update-october-2014 <sup>29</sup> Burberry Manufacturing Restricted Substances List, October 2014,

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<sup>148</sup>Nike Corporate Responsibility Report FY 12/13, update on Zero Discharges, op.cit. "We collect water-quality data from vendors that supply materials to contracted factories through the NIKE Water Program and actively partner with the Institute of Public and Environmental Affairs on their Green Choice Alliance program. We are examining this and other partnerships and activities to further understand what types of disclosure will help us toward our 2020 goal and create value for the industry."

<sup>149</sup>See: http://www.nikeincchemistry.com/sustainable-and-green-chemistry/

"The effort to reduce toxins uses a systematic, risk based approach to assess toxic chemicals in product or processes." <sup>150</sup> NIKE, Inc. Commitment on Zero Discharge of Hazardous Chemicals, 17 August

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<sup>151</sup> Nike Roadmap Toward Zero Discharge of Hazardous Chemicals, 18 November 2011

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<sup>153</sup>Nike Restricted Substances List, See: http://www.nikeincchemistry.com/restricted-substance-list/

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<sup>155</sup>Suppliers List – see 'manufacturing'http://about.nike.com/pages/sustainability

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