



***Detox Commitment
Progress Report
March 2015***

PRIMARK®

Detox Commitment: Progress Report

Introduction

Primark has long recognised the importance of reducing the environmental impact of the manufacturing process, and of continuing to evolve its chemical management policy in line with industry best practice.

To this end, in February 2014, Primark committed to working with industry and other stakeholders to phase out specific chemical groups from the textile and apparel supply chain to achieve the goal of 'zero discharge' by 2020. The detail of this is outlined in Primark's Detox Commitment, agreed in conjunction with the global NGO Greenpeace. A copy of this commitment is available [here](#).

Our commitment comprises two principal components:

- i. chemical phase out
- ii. supply chain disclosure

This progress report provides an overview of our activity to date and outlines the key next steps that we are undertaking to make further progress towards the 2020 goal. Given the complexity and the scope of the commitment, we have focused our efforts in the first 12 months on gathering in-depth insight of current practices and laying the foundation on which we can build an effective and sustainable phase out programme.

We will continue to report on our progress in this way on an annual basis. In addition to this report, the most current information about our programme is available on our website [here](#).

Greenpeace's Detox Catwalk

On the 19th March 2015, Greenpeace released its Detox Catwalk Assessment, ranking brands according to progress against their commitments as Detox Leaders, Greenwashers or Detox Losers.

Primark is pleased to have been recognised as a leader on this issue, one that is particularly important to our customers, and the people that work in our supply chain. We have made good progress, but we have much more to do, and we will continue to work with our suppliers and others in our industry to achieve this.

Details of the Detox Catwalk are available [here](#).

I. Chemical Phase Out

We acknowledge it is a priority to phase out the use of the 11 priority chemical groups identified by Greenpeace from across our global supply chain and that steps must also be taken to identify other chemical groups for phase out beyond these initial 11. Our programme of phase out is being supported by on-going communication about our progress, including the challenges faced, to achieve this goal.

	What have we committed to?	Status
i.	Phase out of the use of 11 priority chemical groups from the supply chain by 2020	On-going
ii.	Carry out an investigation into current compliance regarding the use of APEOs and Phthalates and make the findings publically available on our website	Completed
iii.	Ensure only APEO free formulations are used within our production	On-going
iv.	Ensure only PFC free formulations are used within our production	On-going
v.	Ensure only Phthalate free formulations are used within our production	On-going
vi.	Strengthen our supplier contract language to ensure only APEO and Phthalate free formulations are used within our production	Completed
vii.	Identify other chemicals beyond the priority 11 for phase out	On-going

What chemicals are being phased out?

11 chemical groups have been prioritised for phase out:

1. Alkylphenols
2. Phthalates
3. Brominated and chlorinated flame retardants
4. Azo dyes
5. Organotin compounds
6. Perfluorinated chemicals
7. Chlorobenzenes
8. Chlorinated solvents
9. Chlorophenols
10. Short chain chlorinated paraffins
11. Heavy metals

i. Primark's approach to phase out

We are focused on taking a structured and collaborative approach which includes the following activities:

- Starting with small-scale, comprehensive pilot projects to gather insight into current practices and determine the most suitable approach to phase out
- Learning from and working together with suppliers and other stakeholders to understand and incorporate best practice
- Engaging chemical suppliers and supporting the industry move towards safer alternatives
- Taking a phased, practical approach in order to achieve the commitment credibly at scale

ii. Investigation into current compliance

Gathering first hand insight into the use and discharge of the 11 priority chemicals within the supply base was a critical first step in understanding what chemicals are currently being used and what practices are currently being employed within manufacturing units in order to manage chemical procurement, application and disposal.

To achieve this, we implemented an in-depth pilot, starting in July 2014, working with some of our key Chinese suppliers and wet processing units. China was the focus of the preliminary investigation given its importance as a textiles manufacturing hub and Greenpeace's emphasis on affecting change there as a priority. Of the selected units, three were dyeing mills, one was a dyeing and printing mill and two were garment washing mills. The pilot aimed to identify chemicals present in the effluent discharges from the mills (with a particular focus on APEOs, PFCs and Phthalates) and to assess current chemical management practices within wet processing units.

To ensure greatest impact, we developed a set of criteria to guide the selection of suppliers and wet processing units. This includes ensuring that no other brand is already working with the unit on Detox-related activity in order to bring as many new manufacturing units on board as possible and to avoid duplicating efforts, for the benefit of the supply chain as a whole. This criteria is being applied to all on-going supplier and site selections.

What is a wet processing site?

A wet processing site refers to a production unit where washing, printing or dyeing occurs. In order to achieve chemical phase out, our activity is targeted primarily at these types of units, as this is where the majority of processes involving water, chemicals and dyes take place. These processes can occur within a garment factory if they have the facilities on site or they can occur at separate sites.

Independent testing, inspection and certification provider Bureau Veritas and environmental auditing and consultancy firm Sustainable Textile Solutions (STS) were selected as project partners. Bureau Veritas served as the third party laboratory to collect and test water samples from each factory, while STS, as a specialist in environmental management audits, carried out comprehensive chemical management audits at each of the six sites.

The process involves five key steps:

1. Samples of incoming water, wastewater before treatment, wastewater after treatment and final sludge are collected at every unit. (If no on-site ETP facilities are available, only two samples are collected: incoming water and discharge water).
2. Samples are tested for 117 chemical analytes (components) within the 11 priority chemical groups.
3. A comprehensive chemical audit is carried out at each unit to meet with key staff, assess current practices, document the chemical inventory, collect recipes of production during the sampling period and track the chemicals used during production.
4. Results from the sampling are analysed in order to identify potential sources of any of the 11 priority chemicals detected in the samples and to advise on recommended steps to ensure their phase out in conjunction with the audit findings.
5. Corrective Action Plans (CAP) are prepared for and shared with the mills, outlining general improvement areas in relation to chemical management practices and recommending specific chemical substitutions in order to switch to safer alternatives. On-going support is provided to assist the mills with implementing their improvement plans.

Investigation findings

None of the water samples tested contained levels of any individual chemical analyte above 1ppm (part per million). In many cases the chemicals were either not detected or well below this level. Such levels are generally considered very low in terms of dyehouse effluent. The levels detected in the effluent are not directly related to end product compliance, which is assured by our Restricted Substances List (RSL) and due diligence testing programme.

The pilot confirmed the importance of providing comprehensive training and support on chemical management to suppliers, with a particular focus on wet processing units. Furthermore, the training programme must be tailored to take into account the differences across manufacturing regions, production processes and job roles for it to be truly effective.

The pilot also provided an invaluable opportunity to gain a better understanding of how and where suppliers and their wet processing units procure the chemicals they use. This information is vital in understanding how effective phase out can be achieved. A full summary of our investigation is available on our website [here](#).

To build on the insight gained and to provide a more in-depth baseline assessment, we have now extended our China pilot to include five more dyeing units. We held kick off meetings and undertook wastewater sampling and testing in March 2015 and, in April, our partner, STS, is conducting chemical audits at every site. As part of the briefing meetings for the units that will participate in phase two, we invited representatives from the units that took part in the 2014 pilot to attend in order to share their learnings and to highlight the benefits of the process.

Next steps

We will publish the findings from the extended pilot on our website and use the insights gathered to inform our longer term programme. This on-going activity is enabling us to develop further substitution case studies that will be shared via our website and the Subsport platform. These substitution case studies highlight safer, alternative chemicals that can be phased in to replace current chemicals. The dyeing units are also being supported to upload their wastewater testing results to the IPE platform.

One of the biggest challenges we face is how we affect change and embed new practices at scale. The insight gained through these pilot activities is enabling us to start to develop solutions that will ensure we can engage with large proportions of the supply base whilst maintaining the necessary levels of individual engagement and support.

High priority chemicals for phase out

Of the 11 priority chemicals, we are focusing on three chemical groups as highest priority for phase out, as outlined in our Detox Commitment. These are APEOs, PFCs and Phthalates.

iii. APEOs

We acknowledge it is a priority to phase out the use of APEOs across our global supply chain.

Results from our investigation in China showed that effluent of five factories was found to contain APEO at levels below 1 ppm. Through our investigation, we also gained an understanding of how frequently washing and dyeing facilities procure chemicals and what quantities are bought each time.

We are engaging with our suppliers to emphasise that APEOs are a high priority for phase out and to outline a practical process to ensure they can be phased out and replaced in a sustainable manner. This includes engaging with chemical suppliers to gain verification that formulations being sold are APEO-free and that the necessary documentation is provided with each formulation sold. We have also reviewed what other brands are doing, to ensure we are aligned with the sector approach on APEO phase out.

Next steps

We will continue to engage with our suppliers to support them in phasing out the use of APEOs. We will verify that this phase out has been achieved through on-going supplier engagement and wastewater testing.

iv. PFCs

We acknowledge it is a priority to phase out the use of PFCs across our global supply chain.

Results from our investigation in China showed that effluent of one factory was found to contain PFOA at levels below 0.001 ppm. We are engaging with our suppliers to emphasise that PFCs are a high priority for phase out. We are currently designing a targeted pilot with strategic suppliers of the relevant product types in order to fully assess current usage of PFCs and to understand how PFC free formulations can most effectively be phase in. Within this pilot, we will also work with our partners and targeted suppliers' to undertake a cost analysis of switching from chemical formulations containing PFCs to those that are PFC free. This analysis is essential to be able to understand the impact of substitution on the manufacturing process in terms of both cost and product.

Next steps

We will continue to engage with our suppliers to support them in phasing out the use of PFCs. Following implementation of our targeted pilot, we will use the results to inform our longer term engagement with suppliers on PFCs specifically, including the provision of support and training and the establishment of an effective due diligence programme to provide verification of phase out.

v. Phthalates

We acknowledge it is a priority to phase out the use of phthalates across our global supply chain.

Results from our investigation in China showed that effluent of six units was found to contain phthalates, in each case at levels below 1 ppm. We are engaging with our suppliers to emphasise that Phthalates are a high priority for phase out.

Our priority has been to focus on T-shirts that use plastisol prints, a certain type of printing process that contains Phthalates. 76%* of our key t-shirt suppliers are already using phthalate free inks and dyes.

**Data as of March 2015*

To verify the use of phthalate free formulations and to better understand current practices, we are now designing a targeted pilot in Bangladesh to engage directly with our key t-shirt suppliers on chemical management. The pilot will assess the current use and discharge of the 11 priority chemicals, with a particular emphasis on phthalates, given the link to the production of plastisol prints. As part of our activity, we will also work with our partners and select suppliers' to undertake a cost analysis of switching from certain chemical formulations to those that are phthalate free. This analysis is essential to be able to understand the impact of substitution on the manufacturing process.

Next steps

We will implement the pilot in Bangladesh and publish the findings on our website, using the insights gathered to inform our longer term programme, in particular our engagement with t-shirt suppliers in other regions, namely China, India and Turkey, in order to achieve 100% phthalate free production of printed t-shirts. We will also start to look beyond plastisol prints to focus on PVC products and a targeted phase out programme with relevant suppliers.

vi. Supplier Terms and Conditions

To support the phase out of the 11 priority chemical groups, we have updated our Supplier Terms and Conditions so that they now include a specific reference to Primark's Restricted Substances List (RSL). The RSL outlines our usage requirements for chemicals and highlights all chemical groups that have been prioritised for phase out. All suppliers are subject to Primark's Terms and Conditions of Trade.

Cleaner Production

In addition to our chemical management pilots, we are also engaging in Cleaner Production programmes with key suppliers in both China and Bangladesh. These programmes support chemical phase out, as they focus on improving practices within production sites in relation to water, energy and waste as well as chemicals. We are participating in the PaCT (Partnership for Cleaner Textile) programme in Bangladesh and the BMI (Better Mills Initiative) in China, alongside other brands including C&A, H&M, Inditex, G-Star Raw, Kappahl, Lindex, Tesco and Bestseller.

More information about these programmes is available on our website [here](#).

II. Supply Chain Disclosure

We recognise that transparency about current practices used in the supply chain and communicating the progress towards our commitment is important. In line with the 'Right to Know principle', we are increasing the public availability of information related to our chemical management programme and are working with our suppliers to increase public disclosure of chemical discharges within the supply chain.

	What have we committed to?	Status
i.	Publish an updated copy of Primark's Restricted Substances List	Completed
ii.	Public disclosure of wastewater discharges via the IPE public platform	On-going
iii.	Publish case studies of chemical substitutions via the Subsport.org platform	On-going

i. Primark's Restricted Substances List

Primark has a stringent chemical management policy in place which complies fully with, and goes beyond, EU legislation. **In line with our commitment, and working with experts at Bureau Veritas, Primark's Restricted Substance List (RSL) was further updated to take into account the priority chemical groups for phase out before being made publically available in September 2014.** The 11 chemical groups have been marked as priority for phase out, with APEOs, PFCs and Phthalates marked as high priority for phase out. **Given the initial focus on phase out within Chinese production sites and to ensure Chinese suppliers can fully understand the requirements, we also published a Chinese version.** All suppliers were notified of the new requirements within the RSL. A copy of our RSL is available [here](#) in English and [here](#) in Chinese.

Next steps

The requirements outlined within the RSL will continue to be updated periodically in order to achieve the effective and sustainable phase out of specific chemicals. An updated version will be published before the end of September 2015, as per our commitment.

We recognise the need for an M-RSL (Manufacturing Restricted Substance List) to provide guidance to suppliers on the phase out of certain chemical groups within production facilities and wet processing units, where the majority of washing, dyeing and printing take place. We are now investigating the development of a M-RSL and recognise the need for the sector to work together to agree and implement a joint M-RSL. The provision of adequate training for suppliers to ensure they understand the requirements within the M-RSL and how it should be implemented within their production units is also key, and will form an integral part of our supplier training programme on chemical management.

ii. Public disclosure of wastewater discharges on the IPE platform

In line with our commitment, we have begun public disclosure of chemical discharges via the online platform hosted by IPE (Institute for Public and Environmental Affairs). IPE is a large Chinese NGO that aims to improve environmental governance and promote disclosure of environmental information. The organisation has developed and hosts a database through which organisations, including manufacturers, can disclose information about their effluent discharges. **During our investigation into current compliance in China, we worked with key Chinese suppliers and several wet processing sites to collect and analyse wastewater samples. All results have been disclosed on the IPE platform.** We provided support via our partner Bureau Veritas to assist suppliers with this process. The suppliers we are working with on our China pilot represent 29%* of our production volume for apparel in China and all wet processing sites used for Primark production by these suppliers are now included within our pilot.

Next steps

All sites participating in the on-going pilot activities will be required to disclose their discharge data via the IPE website. As we develop and roll out a training programme on chemical management to all suppliers, we will include information about the IPE platform and provide guidance on how suppliers can access and upload their data to the site.

This will enable suppliers to disclose their discharge data at scale, in line with our commitment. We will continue to engage directly with IPE to help inform this activity.

iii. Case studies of chemical substitutions

A key component of our commitment is to develop and publish case studies that outline specific, individual chemicals that are being used currently in production and highlight how they can be substituted for safer alternatives. This ensures learnings are shared within the sector and supports quicker phase in of safer chemicals.

We have produced three case studies as a result of our first pilot in China. These focus specifically on APEOs, PFCs and Chlorophenols. The case studies are available on our website [here](#) and also in the SUBSPORT Case Story Database [here](#).

Next steps

As we are rolling out additional activity in China and Bangladesh with our key suppliers, we are starting to collate additional case studies that can be published for the benefit of the sector. We have also scheduled follow up visits with the mills from our first China pilot to assess how effective the chemical substitutions have been and will provide an update on these following the visits in April 2015.

Engaging with our stakeholders

We have widely communicated our commitment to Detox, both internally and externally, and continue to engage with a wide range of stakeholders to ensure a shared understanding of the steps we must undertake in order to achieve our 2020 goal.

Suppliers

Supplier conferences were held in 2014 in the UK, China, India and Bangladesh at which all suppliers received information about Primark's Detox commitment. **26 presentations were delivered in total, highlighting Detox as one of the business' key priorities. In total, the audience represented suppliers covering 95% of Primark's production volume.**

All material published in relation to our Detox commitment has been translated into both Chinese and Bengali, including the commitment itself and our RSL, to ensure the information is accessible to our suppliers as well as other interested stakeholders in our manufacturing regions. We will continue to translate all communications into the relevant languages as our programme expands to other manufacturing regions.

Our pilot activities are enabling us to engage directly with our suppliers and are helping to inform the development of a broader engagement programme that will be rolled out across the supply base from 2015. This will include online resources and in-person training.

Customers

Primark has a stringent chemical management policy in place which complies fully with, and goes beyond, EU legislation. This policy is supported by a programme of due diligence and scrutiny to ensure our products comply at all times with these legal requirements and are safe for our customers to use and wear. Our customers care about where their products are made and how they're made; we know this because we are in constant contact with them and they ask us frequently for information about the products they buy.

To ensure our customers can remain up to date with our activities, we have developed a [dedicated section](#) within our website on manufacturing, encompassing both our cleaner production and chemical management programmes. This information is available in all country languages where Primark has retail operations.

Employees

Employees at all levels, both within our head offices and our stores, have received information about our commitment and we continue to share updates within the business as our programme develops. Evolving the programme in the first year has required the involvement of several departments within the business, primarily the sustainability, sourcing, quality assurance and buying teams. As we start to focus on specific product types relevant to individual chemical groups, we are devising a targeted engagement programme with buyers that will align with our supplier engagement programme and ensure buyers and suppliers can work together to achieve the long term phase out of chemicals.

Brands and industry stakeholders

We recognise that collaborating with other brands and industry stakeholders is essential in order to ensure a co-ordinated approach to finding solutions to sector-wide sustainability challenges. As such, Primark is a member of the [Sustainable Apparel Coalition](#) (SAC), a coalition of more than 150 global brands, retailers and manufacturers, as well as government, non-profit environmental organisations, and academic institutions, which are collectively committed to improving supply chain sustainability in the apparel and footwear industries.

Our Partners

In order to achieve our commitment and find sustainable, scalable solutions, we recognise the importance of working in collaboration with experts and other industry stakeholders with whom we have a shared goal.

We are currently partnering with [Bureau Veritas](#) and [Sustainable Textile Solutions](#) (STS*) and continue to seek additional partners who can help us to progress our global chemical management programme. Bureau Veritas Consumer Products Services is an independent testing, inspection and certification provider, serving as Primark's third party laboratory and carrying out water testing and analysis. STS, an environmental auditing and consultancy firm, specialising in environmental management audits, is undertaking chemical management audits on behalf of Primark.

We are also engaging with other organisations that have a key role to play in helping the sector achieve greater transparency of the textile supply base, namely [IPE](#) (Institute of Public Affairs and Environment) and [SUBSPORT](#) (Substitution Support Portal).



*Sustainable Textile Solutions (STS) is a trademark of DyStar Colours Distribution GmbH.

Conclusion

Primark is committed to achieving the 2020 goal and we have made good progress in putting the necessary steps in place to ensure we can implement a credible and effective long term programme of phase out. We recognise that much remains to be done as we move into 2015 and gear up to engage with the supply base at scale. By applying the insight gathered in the first year of the programme and continuing to engage with industry stakeholders and experts, we are confident in our, and the sector's, ability to achieve this ambitious goal.