

The House of Commons Environmental Audit Committee

Fixing fashion: follow-up

Evidence from Primark Ltd

November 2020

Introduction

Primark is one of Europe's largest clothing retailers, with over 70,000 employees and more than 380 stores in 13 countries across Europe and the US. We offer a diverse range of products from women's, men's, baby and kids' clothing to accessories, homeware, gifts and beauty products. Over half of all sales come from 'basics' like socks, underwear and t-shirts.

Primark submitted evidence to the Environmental Audit Committee's (EAC) Fixing Fashion inquiry in [September](#) and [October](#) 2018. We welcome the opportunity to provide an update on our work for the EAC's 2020 follow-up. Our progress includes:

- We have committed to eliminate the use of single-use plastics throughout our business. Over the last 12 months, Primark has removed 175 million items of plastic, from hangers to packaging, from our operations. We also removed 86 million single use labels and stickers from our products. We aim to remove a further 300 million next year.
- We launched our nation-wide recycling programme, inviting customers to donate their pre-loved clothes, textiles, footwear and bags from any brand. Collection boxes are available in Primark's 190 stores across the UK and all donated items are reused, recycled or repurposed, with nothing going to landfill. Profits from the scheme go to UNICEF, Primark's global charity partner, in support of its education programmes for vulnerable children around the world.
- The Primark Sustainable Cotton Programme has been expanded in India and rolled out in Pakistan. As of 2020 the programme has trained 103,222 farmers in sustainable farming practices and we have committed to reaching 160,000 by 2022. This programme is important to Primark because it provides traceability for us and our customers while reducing cotton's impact on the environment and benefitting farmers.
- We have committed to significantly increasing the use of recycled materials across all our product ranges and this autumn introduced a range of everyday essentials across Kidswear, Womenswear and Menswear. This more than doubles our available items made from recycled materials to 40 million. We're pleased with this start and are developing a roadmap in the coming months to make more progress.
- We have signed the UNFCCC Fashion Industry Charter for Climate action, supporting the Charter's net-zero ambition and committing to reduce our carbon emissions by 30% across scopes by 2030 against a 2018-19 baseline.
- We endorsed the Call to Action from the UN's International Labour Organisation on 22 April 2020 calling for urgent collaboration between stakeholders to support garment industry workers across the world affected by Covid-19.

Primark's commitment to ethical trade and environmental sustainability

The standards we expect of our suppliers are set out in our strict Code of Conduct, which we require all suppliers to comply with as a condition of doing business with us. Our Code, which is available on our website [here](#), is in line with international labour standards and sets out core principles regarding working conditions including working hours, wages, and workers' rights. It is based on the Ethical

Trading Initiative's (ETI) Base Code, which is founded on the conventions of the United Nations International Labour Organisation (ILO).

Standards in our supply chain are monitored by our team of over 120 local specialists – all of whom are based in our main sourcing countries – as well as third party auditors approved by Primark. The team carries out over 3,000 audits per year. They visit and review our suppliers' factories unannounced, at least once a year, to review working conditions against our Code of Conduct.

We recognise the impact our products can have on the environment and are committed to reducing this whenever we can. This includes minimising the environmental impacts of our own operations, including our network of stores, offices, transport and distribution centres, while also aiming to ensure that our products are manufactured in an environmentally sustainable way.

We do not own the factories we use to make our products and share 98% of them with other retailers. Rarely can one retailer alone have a positive impact on an entire industry and we frequently work alongside others sourcing from the same factories to monitor standards. We are fully committed to collaborative working with other businesses to address systemic social and environmental supply chain issues. While there is always more work to be done, we believe we have made progress over the years. We are also prepared to develop our own solutions where necessary and have a track record of doing so in areas like fire safety, building integrity and our Sustainable Cotton Programme.

QUESTION 1

What progress has been made in reducing the environmental and social impact of the fashion industry since the Fixing Fashion report came out?

Since the Fixing Fashion report was published in 2019, the work of Primark's Ethical Trade and Environmental Sustainability team has continued at pace. We set out detail on our progress below.

1.1 Primark Sustainable Cotton Programme

Cotton represents 46% of our total fibre mix. Within this, 10.2% of cotton used in Primark products now comes from farms within our Primark Sustainable Cotton Programme (PSCP). Our stated long-term ambition is for all the cotton in our supply chain to be sourced sustainably.

Beginning in 2013, as outlined in our evidence two years ago, Primark brought together agricultural experts CottonConnect and SEWA (the Self-Employed Women's Association) to create the programme. We have full visibility of our PSCP cotton, from farm to product manufacturer. We also conduct due diligence to verify the origin of the cotton through isotope testing in collaboration with Oritain, a science-based traceability company.

We have since seen transformative results in water usage, agrochemical use, yield and average profit for the farmers. As of 2020, the programme is established in three regions in India and has trained 103,222 farmers in sustainable farming practices. Farmers are trained by CottonConnect in the most appropriate farming techniques for their land, from seed selection to harvest. This includes seed growing, soil type, water and pesticide use, cotton picking, fibre quality, grading and storage.

Over a six-year period from 2013 to 2019, cotton farmers in India saw results including:

- An average reduction in water usage of almost 10%
- An average reduction in chemical fertiliser use of almost 26%

- An average reduction in chemical pesticide usage of almost 42%
- An average increase in profits for the farmers of over 200%

Since our last evidence submission, the PSCP has been rolled out to Pakistan and further expanded within India; we have committed to training a total of 160,000 farmers by 2022. This programme is important to Primark because it provides traceability for us and our customers. It reduces cotton's impact on the environment and provides financial benefit to farmers to reinvest in their farms, their homes and their families.

1.2 Worker outreach and empowerment

In the last two years we have built on the work outlined in our 2018 submission to help workers understand their rights and the risks that they might face in the workplace. We have continued to scale our programmes to prioritise worker empowerment, implemented in our sourcing countries in partnership with civil society organisations and local experts.

One example is our collaboration with Carnstone, an expert sustainability organisation, to implement the Promising Futures programme for workers in China. The programme helps workers and factory management understand China's complex social security system; it has so far reached 23,495 workers in 85 factories. We have also expanded on our work in India, where we partner with Women Win, an NGO, to support factories to train vulnerable workers in basic life skills like communication skills and workplace rights. To date this scheme has reached 8,328 workers in 10 factories, with 2,380 workers directly trained.

1.3 Climate change

This year we calculated our scope 3 emissions following the Greenhouse Gas Protocol guidelines and identified emission reduction opportunities in our value chain. We will have the data assured and plan to report our emissions publicly every year from 2020.

We have recently signed the UNFCCC Fashion Industry Charter for Climate action, supporting the Charter's net-zero ambition and committing to reduce our carbon emissions by 30% across scopes by 2030 against a 2018-19 baseline. Our greenhouse gas emissions in the supply chain remain a key challenge for us to address in the coming years because they make up the vast majority of our carbon footprint. As signatories of the Fashion Charter, we are actively participating in working groups with other retailers, brands and suppliers to identify and implement scalable actions to decarbonise our supply chain and our operations.

We have also joined the Climate Roadmap for the UK retail industry that was [launched by the British Retail Consortium](#) on 10 November 2020 at the UN Race to Zero November Dialogues. As a supporter of the roadmap, we commit to working with other retailers, suppliers and other stakeholders to collectively deliver on the industry net-zero targets.

1.4 Supply chain transparency

We have full visibility of all the approved first-tier production sites that make our products, and in 2018 we published our [Global Sourcing Map on our website](#). The map represents over 95% of products for sale in Primark stores. Since 2018, we have been taking steps to map our supply chains through the lower tiers as well.

Beyond the first tier we ask our direct suppliers to declare factories and upstream suppliers, including material processing units and the origin of some raw materials, every 12 months. By the end of 2019, a total of 261 key suppliers (making up over 75% of volume) had declared this. With the variety of products and materials we use, we would like to adopt a more systemic approach to traceability of our supply chain and are exploring technological solutions to this end.

As stated by Dr Mark Sumner of Leeds University in the Fixing Fashion Report, transparency of the source of raw material in garments by brands would “lead to a paradigm shift in attitudes. This type of approach would be ground-breaking for the industry, setting an aspirational, but achievable standard that would be the envy of the rest of the developed world”.¹

We have been working with our suppliers to map our supply chains to raw material, including cotton and Man-Made Cellulosic Fibres. This year we have mapped approximately 70% of our viscose supply chain and will re-map it in 2021.

1.5 Updates to our Code of Conduct on grievance mechanisms

Primark is taking steps to make it easier for workers in the supply chain to raise grievances directly with the company. A new clause in our Supplier Code of Conduct requires our suppliers to have a grievance procedure that allows workers to raise and address workplace grievances without fear of reprisal. It must be clearly communicated and easily accessible. We require management to address any workers’ concerns raised via the Grievance Procedure promptly, and it must not be used to undermine the role of trade unions and collective bargaining processes. The new Code of Conduct came into effect in September 2020; suppliers have six months to update before this requirement will be audited against in March 2021. Our expert teams on the ground in nine of our major sourcing countries are facilitating the necessary dialogue to aid this transition.

1.6 Plastic reduction

Since the Fixing Fashion report was published we have committed to eliminate the use of single-use plastics throughout our business. Over the last 12 months, Primark has removed 175 million items of plastic, from hangers to packaging, from our operations. We also removed 86 million single use labels and stickers from our products. We aim to remove a further 300 million next year.

1.7 Industry and government collaboration

Industry collaboration is essential for achieving long-term, sustainable change in the garment sector. The last two years have seen a strengthening of industry collaboration across a wide range of social and environmental initiatives. Since the 2019 report, we have been working closely with organisations including Ethical Trading Initiative, ACT on Living Wages, the ILO Call to Action, Anti-Slavery International and Business Fights Poverty.

We have also worked with the UK Foreign, Commonwealth & Development Office (FCDO – formerly DFID) as part of a 2015 agreement Primark signed with the Department to work together to improve working conditions for garment workers in key sourcing countries. Primark is working with the FCDO as part of its Vulnerable Supply Chains Facility², announced in August 2020.

¹ Dr Mark Sumner, Leeds University, Fixing Fashion Report, pg. 23

<https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/1952/report-summary.html>

² <https://www.gov.uk/government/news/uk-aid-to-protect-high-street-supply-chains>

Additionally, Primark is involved in the FCDO’s Work Opportunities for Women project. We have engaged in several ways including contributing to a study on gender data in global supply chains, which has resulted in two public reports: *Building Back Equitably: Spotlight on Covid-19 and women workers in global value chains*³ and *Hidden in Plain Sight: why we need more data about women in global value chains*⁴.

Since Primark does not own or operate any factories, building relationships throughout the supply chain is a key factor in our success. To drive continuous improvement in environmental performance, collaboration with industry organisations like the Sustainable Apparel Coalition (SAC) is also necessary. The SAC has developed a suite of tools known as the Higg Index, which enables brands, retailers and facilities to measure and score the sustainability performance of a company or product. As one of the 200-plus members of the SAC, Primark has committed to rolling out the Higg Facility Environment Module throughout its supply chain by 2022.

Our Ethical Trade team developed guidelines providing suggestions for how to frame and structure discussions with our NGO partners during Covid-19, when many of them are facing a time of unprecedented crisis and challenge. These guidelines reviewed the work we and our partners are involved in currently and how they could continue while countries were in lockdown. Where possible, we took measures to reorient the NGO partners’ work to provide support to communities in need during Covid-19. These guidelines contributed to the Business Fights Poverty Toolkit on the same topic, which can be downloaded [here](#) on the BFP website.

Collaboration



QUESTION 2

What impact has the pandemic had on fashion waste?

Research from WRAP in June 2020 estimated that more than a third of the UK population has had a clear out of unwanted textiles and clothing while at home on lockdown⁵. WRAP urged people to protect charity shops from an influx of donations by contacting them before turning up with donations, and using other options including in-store collections. The absence of kerbside textile

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/925778/Building-back-equitably.pdf

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/924704/Hidden-in-plain-sight.pdf

⁵ WRAP report 24th June 2020: around two in five (41%) UK citizens have disposed of textiles during the COVID-19 lockdown.

recycling in the UK means people don't always find it easy to recycle their clothes, textiles and shoes. We know that big lockdown clear-outs have created a need for alternative solutions to deal with unwanted garments.

Primark announced its in-store recycling scheme in July 2020, with collection boxes available in all 190 stores across the UK. All donated items will be reused, recycled or repurposed, with nothing going to landfill. Profits from the scheme go to UNICEF, Primark's global charity partner, in support of its education programmes for vulnerable children around the world. The scheme accepts items originally bought at any retailer, not just Primark.

Since launching, we have supplied 1,302 bags to Yellow Octopus (our recycling partner), equating to over nine tonnes of textiles. It is early days for the scheme, and store closures due to Covid-19 will have impacted customers' ability to use it. However, we are pleased with results in this context and will continue to promote the initiative.

QUESTION 3

What impact has the pandemic had on the relationship between fashion retailers and suppliers?

3.1 Covid-19 and our suppliers

The pandemic has had a devastating impact on the garment industry and the retail supply chain. The ILO estimates that the import of garments to the EU declined by 25% from January to June compared with the same period in 2019. With the EU representing one of the world's top three importers of apparel in 2018, the impact of this decline in imports on garment works and factories cannot be overstated.⁶

There has been a clear correlation between countries with stricter lockdown measures and a fall in consumer demand, which has translated into impacted import volumes and affected relationships with suppliers.⁷ All 375 Primark stores across Europe and the US were closed in March for some three months, due to government restrictions to help curb the spread of Covid-19. With no idea of how long stores might be closed for, and some £1.5bn of orders in stores, warehouses or transit with no means to sell the stock, we had to make some difficult decisions – including the need to cancel further orders.

This was unprecedented action during unprecedented times. From the start, we were fully transparent with our suppliers. We held hundreds of one-to-one meetings with them to help determine constructive ways to deliver the necessary support to those affected. We worked at every stage to find cost mitigations across our business, and diverted as much of these savings as possible back to the supply chain. As a result we were able to do the following:

- In April we established a 'wages fund' – an advance payment to suppliers covering the labour component of originally affected orders. The fund formed a part-payment for orders that were in production for Primark and paid under our extended payment terms; it provided wages to workers in Bangladesh, Cambodia, India, Myanmar, Pakistan, Sri Lanka and Vietnam. £23m was paid to the wages fund in total.

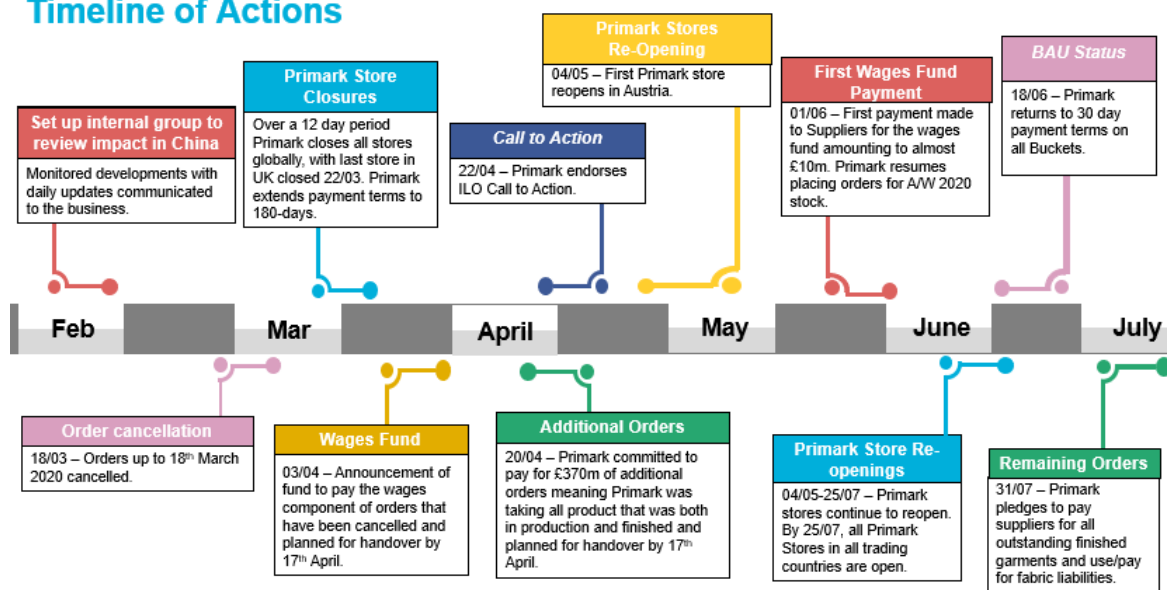
⁶ https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/briefingnote/wcms_758626.pdf

⁷ https://www.ilo.org/wcmsp5/groups/public/---dgreports/---inst/documents/publication/wcms_749368.pdf

- We committed to taking an additional £370m of orders finished and/or in production. This brought our total stock owned or committed, while our stores were closed, to some £2bn.
- When our stores reopened, Primark made a further substantial commitment in relation to orders that had been cancelled in March, and pledged to pay our suppliers in full for all outstanding finished garments and to utilise or pay for any outstanding finished fabric liabilities. This commitment ensured that our suppliers will have been paid for all in production and finished garments and fabric costs incurred for Primark. Orders worth £1.25bn have been placed with our suppliers for goods for the autumn/winter season.

With the announcement of a second national lockdown in England and temporary store closures in many other countries in which we trade in November 2020, we have confirmed that we will be honouring all orders. So far Covid-19 has cost Primark some £2bn of sales, £650m in lost profit and a cash outflow of £800m.

Timeline of Actions



3.2 ILO Call to Action

Primark firmly endorsed the [Call to Action](#) from the UN’s International Labour Organisation on 22 April 2020 calling for urgent collaboration between stakeholders to support garment industry workers across the world affected by Covid-19. We worked closely with the ILO and the other organisations involved to collaborate with governments, international financial institutions, development banks and others about developing a shared set of principles for responsible engagement in the RMG industry in the immediate-term and for the future. The aim is to generate action and drawdown funding from international finance institutions to:

- Protect workers’ income, health and employment
- Support employers to survive during the Covid-19 crisis
- Work together to support establishment of sustainable systems of social protection

Primark is involved in the caucus groups for Bangladesh, Cambodia, India and Myanmar.

The International Organisation of Employers and the International Trade Union Confederation, on behalf of all endorsing organisations, wrote to the leadership of the World Bank Group, International

Monetary Fund and regional development banks, to request support for the objectives of the Call to Action. Specifically, this was to explore financial support measures including access to credit, unemployment benefits and quick income-support to workers and individuals, no or low-interest short-term loans, tax abatement, duty deferral, fiscal stimulus, and others forms of support.

In the long-term Primark hopes this initiative will also support the introduction or strengthening of schemes like social protection and health benefits. It will take the collective efforts of all the signatories to make this call to action a reality.

3.3 Our Ethical Trade and Environmental Sustainability Programme

During the pandemic we have worked with partners to pivot our existing outreach programmes to focus on the response to Covid-19. Details are set out in the table below.

Primark Programme	Country	Partner	Information
My Life programme	Myanmar	Women Win (international NGO) and Girl Determined (Myanmar-based NGO)	Programme is being re-designed to work in worker communities rather than in factories. Working to address the increase in domestic violence created by the pandemic.
Promising Futures programme	China	Carnstone (UK sustainability experts)	The project undertook a survey of Chinese workers to understand the impacts and supported them with information on how to access social security.
Distributing WASH educational materials on hygiene and sanitation	India, Bangladesh, Pakistan	CottonConnect	We gathered materials from CottonConnect and others (some from the British Asian Trust) and distributed to local NGOs and organisations through our professional and personal networks.
My Space programme	India, Pakistan	St John's Medical Centre	The My Space programme was established to help factories set up basic counselling services to workers and remove the stigma around mental health. During the pandemic, 45 of the 60 counsellors from the programme kept in contact with workers to spread awareness about Covid-19 prevention and provide mental health support.

Further to the programme activities that have been pivoted, our in-country teams have also developed other ways to support workers during the pandemic. For example, our team in Bangladesh has developed a series of virtual training sessions about raising awareness of Covid-19, targeted at readymade garment workers to encourage mask-wearing and handwashing hygiene. This has reached 18 factories throughout Bangladesh so far and we are looking at ways to upscale the programme.

QUESTION 4

How could employment law and payment of the minimum wage be more effectively enforced within the UK fashion industry?

None of the garments Primark sells are made in the UK. We have, however, experienced challenges in warehouse and distribution networks that rely heavily on agency and contracted labour.

Primark has a team of over 120 local experts based in our main sourcing locations, and this includes a team based in the UK who, along with carefully-selected third party auditors, monitor the working conditions and labour standards in Primark-approved sites in the UK (for example warehouse and distribution centres). We believe there is a need for more holistic and systematic enforcement of the laws within the UK that serve as protection for workers in UK supply chains, an opinion we have voiced to the UK Ethical Trading Initiative and the British Retail Consortium as well as in the consultation which led to the Labour Market Enforcement Strategy.

Although none of our garments are made in the UK, we are an observer of the Apparel and General Merchandising Public Private Partnership, from which we have observed the need for more information sharing between industry and the authorities, and better enforcement of basic legal requirements. Primark continues to monitor and remediate issues in our own supply chain in line with the United Nations Guiding Principles on Business and Human Rights. However, enforcement of labour laws is bigger than one company or sector.

- We would like to see a country-wide and cross-sectoral approach to the enforcement of laws protecting all workers in UK supply chains.
- We support calls from the Director of Labour Market Enforcement for HMRC's National Minimum Wage team to have greater resourcing to increase their inspection and detection work. We would also like to see the scope of certification for labour providers extended beyond agricultural workers and into all sectors.
- We support the key recommendations made in the 2019/2020 Labour Market Enforcement Strategy.
- We also support moves to establish a Single Enforcement Body once that consultation has concluded, but believe it is vital that sufficient funds are allocated for that Body to effectively protect workers' rights.

QUESTION 5

What are the pros and cons of proposals to license factories or more strongly regulate purchasing practices?

5.1 Licensing

We believe any licence programme must have sufficient resources allocated to it – both for approving the initial licence against a standard requirement and then maintaining assurance and due diligence thereafter.

It is our understanding that the well-publicised issues that have come to light in Leicester in recent years are not peculiar to garment manufacturing, nor potentially to any other location within the UK. Therefore, for the UK's supply chains to be compliant with legislation, we call for a more joined-up approach with a wider scope than just licensing factories. Specifically, any approach must also include warehousing, distribution and recycling facilities across the UK, and must be enforced by agencies who are sufficiently resourced to do so.

A licence programme should be based on UK law as a basic minimum. The UK has strong health and safety legislation on minimum wage and other labour laws, and this existing legislation needs to be enforced while holding businesses directly accountable.

5.2 Purchasing practices

Improvements in purchasing practices can help to “create the space for substantial and continuous wage growth, and a sustainable development of the garment, textile and footwear sector”.⁸ More strongly regulated purchasing practices provide an opportunity to level the playing field and commit all brands to this objective, so business relationships with suppliers can support decent working conditions throughout supply chains globally.

QUESTION 6

What would be the most effective measures industry or Government could put in place to ensure that materials or products made with forced or prison camp labour are removed from the supply chain?

Primark strictly prohibits the use of forced labour in the manufacturing of our products. Our Code of Conduct requires that there is no forced or compulsory labour in any form, including bonded, trafficked or prison labour.

We have a team of over 120 local experts in our major sourcing locations who are specialists in matters of labour standards and working conditions. They spend their working lives in Primark-approved factories checking conditions and talking to workers. The members of our team are trained to understand and recognise indicators of forced labour, and in how to act and respond when such indicators are found. Our team’s training is conducted on an ongoing basis to keep abreast of new or developing nuances of forced labour including, for example, those unfolding in modern day China. We believe that the most effective measure to tackle forced labour is this team of local experts, the monitoring activities they conduct and the network of third-party expert partnerships that we maintain.

Existing and proposed due diligence legislation, both EU-wide and at individual member state level, will hold companies legally responsible for violations of human rights in their supply chains. We have been following these developments closely and support moves to introduce a framework for mandatory due diligence. We believe business can be a force for good if properly managed, and such a framework can offer business a view on what “good” looks like. It offers the opportunity for guidance to be given, and also for there to be a level playing field across businesses and industries. Sector-specific guidance on forced labour issues and the due diligence framework would be welcomed, and we would be happy to be involved in any consultations on this matter.

We welcomed the introduction of the Modern Slavery Act and adhere to all requirements included in the Act. We publish an [annual statement](#) setting out what steps the business has taken during the financial year to monitor labour standards and working conditions in factories that supply us, as well as what proactive and reactive remediation activity we conduct, either on our own or collectively.

⁸ <https://actonlivingwages.com/purchasing-practices/>

QUESTION 7

How can any stimulus after the Coronavirus crisis be used to promote a more sustainable fashion industry?

The fragility of global supply chains has been thrown into sharp focus by the pandemic. The ILO estimates that throughout Asia and the Pacific, almost 50% of all garment supply chain jobs were dependent on demand from countries with strict lockdown measures, where there were also sharp declines in retail sales.⁹ As a result, 1.6 billion workers could suffer “massive damage” to their livelihoods because of Covid-19.¹⁰

The crisis has highlighted the variation in social protections afforded to workers across the countries we source from. We support moves to improve these systems where needed. As a signatory of the ILO Call to Action, in which social protections are called out as a focus for attention, we are active members of several of the various country caucuses where social protections are discussed. We would welcome any support available to further these efforts.

Primark supports the aspiration to ‘Build Back Better’ and recognises the need to prioritise decent work for all. This means not only focusing on the security of jobs during and after the pandemic, but also prioritising the quality of jobs that are built back by encompassing principles of social protection and health and wellbeing.¹¹ To this end, we support the following initiatives and priorities:

- We are working with the FCDO as part of its Vulnerable Supply Chains Facility, a scheme launched to strengthen global supply chains and support workers in developing countries during the coronavirus pandemic.
- We believe a green recovery after the crisis should assist the fashion industry make a low-carbon transition. This requires measures to further expand renewable energy capacity and generation, deployment of zero-carbon heat and actions to boost energy efficiency in buildings. Part of the fashion industry’s supply chain still relies on coal-fired boilers; investments are needed to identify scalable alternatives for coal phase-out.
- We believe measures are required to support innovation and incentives for the deployment of low carbon solutions in the distribution sector for heavy goods transport.
- Lastly, the fashion industry relies on agriculture and livestock for some of its raw materials. We therefore believe that supporting farmers in the shift to sustainable agricultural practices, in a cost-efficient manner that does not affect yields and livestock productivity, will be crucial in the fashion industry decarbonisation journey.

QUESTION 8

Is the Sustainable Clothing Action Plan adequate to address the environmental impact of the UK fashion industry? How ambitious should its targets be in its next phase?

SCAP is an industry-wide commitment made by brands, retailers, charities and recycling organisations to collectively reduce the carbon, water and waste impacts of the clothing industry by 2020. We became a member in 2015 and have signed up to SCAP’s industry-wide targets, which we report on annually:

⁹ https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/briefingnote/wcms_758626.pdf

¹⁰ https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_743036/lang--en/index.htm

¹¹ Ibid.

- 15% reductions in the carbon and water footprints of clothing placed on the market in the UK by SCAP retailers and brands, measured per tonne of garment sales
- 3.5% reduction in waste arising over the product life cycle across all SCAP signatories
- 15% reduction in clothing waste going to landfill and incineration (energy from waste) in the UK.

Since we signed up to SCAP's 2020 Commitment, Primark has worked alongside over 80 organisations to successfully achieve the reduction targets as an industry collective. We will continue to support WRAP in reducing the environmental footprint of the clothing and textiles industry; Primark is a signatory of the Textiles 2030 commitment, the successor to SCAP, which will launch in April 2021.

The new agreement, funded by its signatories and by government, seeks to build on SCAP by harnessing the knowledge and expertise of UK leaders in sustainability to accelerate the whole fashion and textiles industry's move towards circularity and system change in the UK. It is designed to limit the impact clothes and home textiles have on climate change in line with the Paris Agreement and the UN Fashion Industry Charter for Climate Action.

Businesses will set targets, measure their impact and track progress on an individual basis and towards national targets. For example, by 2030 signatories will reduce sector greenhouse gas product emissions in line with a 1.5°C global warming trajectory. Signatories will also collaborate to create and deliver a UK-wide roadmap for circular textiles, with an ambition to reduce waste and achieve the climate target by making more durable, recyclable and re-usable products and using more recycled, circular materials.

As a member of WRAP and signatory of SCAP, we get first-hand insight into industry knowledge and what legislation is coming down the line. SCAP has been a useful knowledge-sharing platform where brands can learn from each other, and this kind of dialogue has really informed our programme at Primark. Brands aside, other organisations like Textile Exchange, BRC and Yellow Octopus are part of SCAP, which has been pivotal in providing us with the most recent updates in industry thinking.

SCAP works in a way that no other initiative does. It looks at fibre composition, conducting a lifecycle analysis of those fibres, and understanding how this impacts on brands' waste reduction. No other initiative analyses brands' raw material usage in this way. Although it has fallen short on some targets, we remain supportive of the initiative and its focus engaging consumers to accelerate progress toward a sustainable and circular industry.

QUESTION 9

What actions could Government take to improve the collection of fashion waste?

We said in our 2018 submission that a specific focus on waste would be a welcome outcome of the EAC's inquiry. We suggested that this focus should highlight the need to address waste at both the production stage and the consumer/retailer end of garment life cycles. Two years later, we would continue to encourage the government to stimulate economic growth through a green recovery.

Compared to bottle and paper recycling, textile recycling in UK is relatively basic and focuses mainly on upcycling items in very good condition for resale. Other items are not upcycled and generally find themselves in landfill, incineration or downcycled. The government should invest in more

sophisticated recycling centres and consider kerbside recycling for textiles across the country, as well as creating incentives for full textile recycling.

Other targeted waste reduction initiatives within the fashion industry could include:

- Strategies to encourage consumers and retailers to recycle and re-use discarded clothing and footwear, including the introduction of compulsory textile take back schemes for retailers to ensure that clothing is recycled responsibly.
- Continuing to enhance the UK textile recovery system to emulate the current recycling structure seen in other sectors like bottles and paper.
- Building on current government initiatives which continue to support the textiles industry, such as SCAP.
- Schemes to support better alignment among consumer countries and producer governments on common goals and issues.
- Supporting the industry to create clearer information and labelling about the sustainability of clothes to increase consumer awareness around increasing garment longevity.
- Funding research to improve the current obstacles the UK textile industry is facing, such as contamination on dry recycling services, limitations in sorting capabilities and lack of appropriate infrastructure.

QUESTION 10

What actions could the Government take to incentivise the use of recycled or reused fibres and materials in the UK fashion industry?

A study by WRAP suggests that by 2030 there will be 2.37 million tonnes of textiles produced which, if not recycled, will put significant pressure on residual waste. To prevent this, there needs to be a policy approach led by the government which incentivises the uptake of recycled and reused fibres and supports the scaling of recycling technologies in the UK. Primark is an active member of WRAP and supports its textile policy recommendations to DEFRA, for example a textile content tax or ban on unsold stock to landfill or incineration.

Primark would welcome the introduction of compulsory take-back schemes for textile retailers to ensure that clothing is recycled responsibly. As stated, Primark has rolled out its own in-store recycling scheme this year. We also believe that partnerships with local councils would increase the opportunities for kerbside recycling and empower consumers to dispose of their unwanted garments in a more sustainable way.

QUESTION 11

How could an Extended Producer Responsibility scheme for textiles be designed to incentivise improvements in the sustainability of garments on sale in the UK?

We are looking closely at some of the key issues identified by the Textile Recycling Association (TRA) in its recently published position paper on Extended Producer Responsibility for clothing and textiles. We are currently in the process of developing our position.