

Sustainability of the fashion industry
An inquiry by the Environmental Audit Committee

Written evidence submitted by Primark Ltd.

September 2018

Introduction

Primark is one of Europe's largest clothing retailers, with over 75,000 employees and more than 350 stores across 11 countries across Europe and in the US.

The company offers a diverse range of products from women's, men's, baby and kids' clothing to accessories, homeware and beauty products. However, over half of all sales come from 'basics' such as socks, underwear, and t-shirts.

The company was established in 1969 in Dublin under the name Penney's, and is owned by Associated British Foods Plc. The Primark headquarters remain in Dublin.

As an expanding international business with global supply chains and a growing retail base, we believe that business has a responsibility to act and trade ethically, and that by doing so, it can be a force for good.

Primark welcomes the opportunity to submit written evidence to this inquiry.

Commitment to Sustainability

We strive to ensure that Primark products are made with respect for both people and the planet. We take our responsibility to the workers in the factories that make our products, their communities, and the environment very seriously.

We work hard to ensure our products are made in good working conditions and that the people making them are treated properly and paid a fair wage. We also seek to reduce our impact on the environment wherever possible.

We have a dedicated Ethical Trade and Environmental Sustainability team of over 110 experts based across key sourcing countries who oversee and implement our programme, as illustrated below.



Figure 1

Primark's Environmental Sustainability Programme

We are committed to reducing the impact our business has on the environment.

This includes minimising the environmental impact of our own operations, including our network of stores; offices; transport and distribution centres, and also aiming to ensure that the diverse range of products we sell are manufactured in an environmentally sustainable way across our supply chain.

Primark was one of the first large retailers to publicly demonstrate its commitment¹ to managing environmental impact (2014) and has invested significantly in developing an Environment Management Strategy (EMS) that supports Sustainable Development Goals. The strategy has six key focus areas with almost 100 individual objectives (see figure 2).



Figure 2

The objectives will address our most salient risks (chemicals, wastewater, plastic and packaging, GHG emissions, textile waste, natural capital, leather, cotton, animal welfare, palm oil and transparency) in a rigorous and systematic way.

Focus on Fibres

Our value chain analysis² shows that the most abundant fibre in Primark products is cotton. We are currently researching alternative fibres, particularly those with the potential to reach scale. Within our industry, we are particularly well-positioned to do this given the agricultural expertise and resources within our parent company, Associated British Foods.

¹ <https://www.primark.com/~media/ourethics/detox/pdfs/primark%20detox%20commitment.ashx>

² For fibres we analysed our value chain and focussed on the top four countries where Primark products are made e.g. China, Bangladesh, India and Turkey. and our most significant fibre which is cotton. A methodology based on ISO 14001 was then used to understand what the significant impacts are of the materials used in Primark products. Impact data was taken from the Primark Fibre Toolkit, Sustainable Apparel Coalition Materials Sustainability Index, and other sources.

Focus on Industry Collaboration – Moving Sustainability to Scale

We share 98% of our third-party production sites with other high street retailers, and as such, we regard industry collaboration as essential to long term sustainable change through scaling worthwhile initiatives, increasing leverage, and spreading best practice.

In line with G7 guidance (2015)³ on tackling environmental issues via strong, recognised multi-stakeholder initiatives (MSIs), Primark works with over 33 MSIs to address environmental sustainability issues, including the Ellen MacArthur Circular Economy Initiative and Zero Discharge on Hazardous Chemicals (see figure 3).

COLLABORATIONS BY FOCUS AREAS

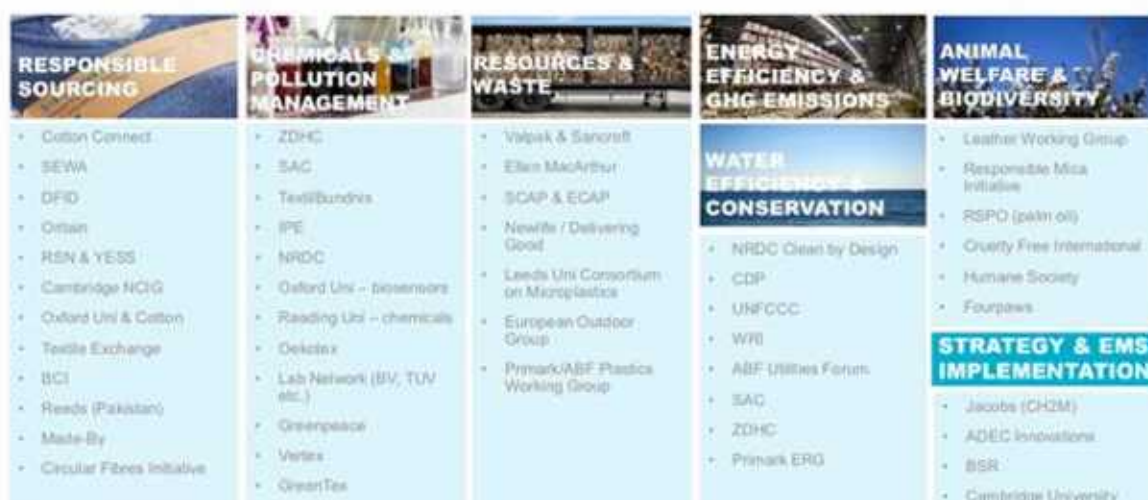


Figure 3

Fashion for All

Three important points should be considered.

Firstly, all consumers, whether affluent or less well-off, have an equal right to choice. Primark offers affordable clothing across the UK to customers including the poorer regions (90% of the poorest areas in Northern Europe are in the UK).

Secondly, not only do our customers look for affordable clothing but they also demand choice at value prices, giving them the ability to be fashionable on a budget.

Thirdly, products sold at a higher-price are not necessarily more durable or longer-lasting than “fast” or value fashion.⁴

³ Leaders’ Declaration G7 Summit (2015) Think Ahead. Act Together, G7 Germany Schloss Elmau 7-8 June 2015.

⁴ <http://www.dailymail.co.uk/femail/article-5605395/Can-2-white-T-shirt-Primark-beat-Poshs-90-one.html>

Environmental Impact of the Fashion Industry

QUESTION 1

Have UK clothing purchasing habits changed in recent years?

Data shows that the volume of women's clothes bought in the UK has decreased in the last ten years.

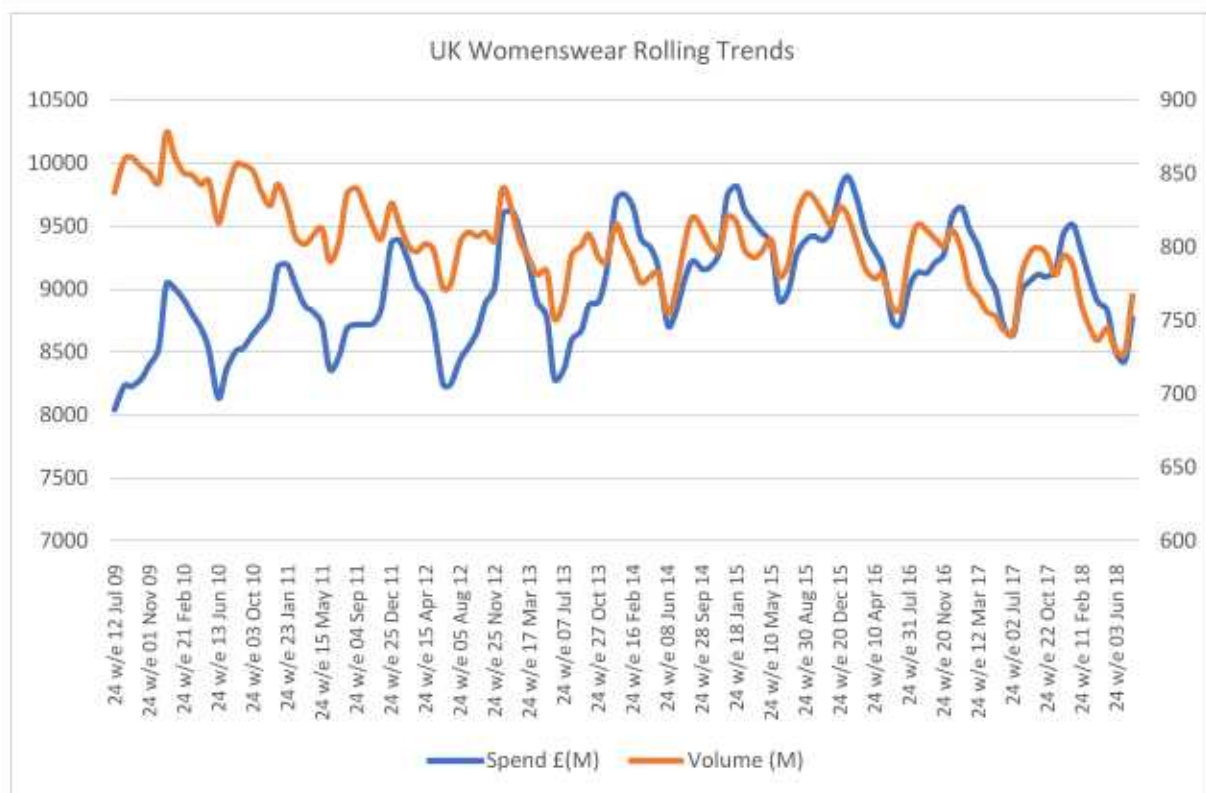


Figure 4: Source Kantar

The latest WRAP report shows that UK shopping habits 'have a lot more scope to be smarter and more sustainable' and that an intention-action gap currently exists. Consumers desire products that are sustainably produced and have limited impact on the environment but are 'less likely to look for them when buying'.⁵

It is therefore important to continue to encourage UK consumers to ask questions about the products they buy and seek out information (Primark works hard to provide this via our online resources including our website⁶ and dedicated education

⁵ <http://www.wrap.org.uk/content/consumer-clothing-survey>

⁶ <https://www.primark.com/en/our-ethics>

resource⁷), and also learn how to take care of their products once purchased; the WRAP study shows that in the UK, people now lack the skills required to repair and alter clothing.

QUESTION 2

What is the environmental impact of the fashion supply chain? How has this changed over time?

The volume of total clothing units produced worldwide by the textile industry has doubled (from 50bn to 100bn) in the past 15 years.⁸

The total number of global suppliers and supply chains has significantly increased and, in tandem, so has the impact of these on the environment. Assessment of these growing impacts was first properly addressed by the industry through the development of the Sustainable Apparel Coalition (2009) followed by the Zero Discharge for Hazardous Chemicals Group (2011), both of which Primark is a member of.⁹

QUESTION 3

What incentives have led to the rise of “fast fashion” in the UK and what incentives could be put in place to make fashion more sustainable?

Technological advances and improved logistics have led to the faster design, production and delivery of products, facilitating a more agile response by brands and retailers to new trends and consumer demands. This faster speed to market model was first introduced in fashion in mainland Europe and has become synonymous with the phrase 'fast fashion'.

More recently, the term has also been used to highlight concern over what is perceived by some as poorly produced clothing, manufactured with little regard for people or the environment. This in turn, has also led to a further issue where some consumers may

⁷ The starting point for information that schools have can often be misleading and inaccurate. The perception is “low price equates to poor ethical practice”. To respond proactively and positively to an increasing number of enquiries we developed this range of curriculum-linked resources. <https://www.primark.education/> Teachers can access free resources for Business Studies, Geography, Citizenship, PHSE and RE that provide a real-life case study for students aged 11-14 on the topics of environment, ethics and the clothing journey.

⁸ <https://www.ellenmacarthurfoundation.org/publications/a-new-textiles-economy-redesigning-fashions-future>

⁹ The Sustainable Apparel Coalition (SAC) is a group of more than 200 brands, retailers, suppliers and organisations, who are working to reduce the environmental and social impact of the industry. The SAC has a suite of measurement tools, collectively known as the Higg Index. The 'Higg' helps guide a more sustainable design process, assess and improve the impact of manufacturing facilities, and helps a company report out on the sustainability of their operations and the lifecycle of their products.

The ZDHC Programme is also a collaboration of fashion brands, who along with supply chain partners, are working together to fully eliminate the discharge of hazardous chemicals across production facilities. To date, the initiative has created an industry MRSL (Manufacturing Restricted Substances List), conformance guidance, audit protocols in collaboration with the SAC, and wastewater guidelines. They also support the industry by sharing data and providing trainings

view such clothing as disposable, leading to a 'throwaway culture'. (We address this issue in Q6, Waste)

Our insight, based on our experience, is that it is not the speed at which fashion can be created and manufactured which is at fault, but instead the effect of poor management of supply chains on workers and the environment across the textile industry as a whole. It is worth noting that 88% of Primark's product is sourced from "long lead time" countries including China, Bangladesh and India. Planning, good management and sufficient resources are all required to identify, prevent and mitigate this; for example, through raising awareness and implementing training across purchasing practices.

Our view

In our view, there are three areas which need to be addressed in order to make the textile industry more sustainable: platforms for engagement, resources and incentives.

Platforms for Engagement

Various European governments have brought industry participants and policy makers together to work bilaterally:

- The Netherlands has a government initiative aimed at creating a fully circular economy by 2050 which includes the fashion industry.¹⁰
- The French and Dutch governments are planning to introduce new regulations prohibiting apparel brands and retailers from discarding or incinerating unsold items, and in France, offering tax breaks for companies that re-use or recycle.¹¹
- The German government has created a partnership for sustainable textiles which aims to achieve social, ecological and economic improvements within the entire textile supply chain.¹²
- The UK government launched its Sustainable Clothing Roadmap, followed by the Sustainable Clothing Action Plan¹³ and also funded a 'Love Your Clothes' consumer campaign to promote reusing and recycling of garments.¹⁴

We would welcome the alignment of national initiatives to ensure consistency and drive wider engagement.

Resources

We believe that the UK government could also do the following:

- More clearly signpost information available to businesses to support efforts to become more sustainable.

¹⁰ <https://www.government.nl/documents/policy-notes/2016/09/14/a-circular-economy-in-the-netherlands-by-2050>

¹¹ <https://www.ecotextile.com/2018042523440/fashion-retail-news/france-proposes-law-to-tackle-unsold-clothing-problem.html>

¹² <https://www.textilbuendnis.com/en/>

¹³ <http://www.wrap.org.uk/content/scap-2020-commitment-archived>

¹⁴ https://www.loveyourclothes.org.uk/?_ga=2.202010773.545521501.1535643263-750603054.1529267454

- Make businesses aware of how they might align their strategies to UN Sustainable Development Goals.
- Raise awareness of the Task Force on Climate Related Disclosures.¹⁵

Incentives

A significant criticism of 'fast fashion' is its perceived disposability. To combat this, retailers could be incentivised to implement credible Take Back schemes. In 2016 we successfully launched a customer Take Back pilot in five stores (in the UK and Germany).

We encouraged customers to recycle their textiles and shoes in store and following this successful pilot, we are now in the process of scaling up this programme to all stores. As per our comment above we would welcome the introduction of compulsory take-back schemes for textile retailers.

QUESTION 4

Is “fast fashion” unsustainable?

Recycling

One of the key challenges [presented by 'fast-fashion'] is that less than 1% of clothing is recycled into new clothing¹⁶. There is a consensus between think-tanks and governments that this linear system of manufacturing must be addressed.

The Circular Economy

The circular economy ambition is to retain as much value as possible from material supply chains while minimising waste, increasing productivity and decoupling growth from natural resource consumption. To achieve this, system-wide innovation is required, with all parties (brands, retailers, suppliers and government) playing a role.

The Ellen MacArthur Foundation report 'A New Textiles Economy,' highlights four areas that require attention in order to move towards a Circular Economy (see figure 4).¹⁷

¹⁵ <https://www.tcfhub.org>

¹⁶ <https://www.ellenmacarthurfoundation.org/publications/a-new-textiles-economy-redesigning-fashions-future>

¹⁷ <https://www.ellenmacarthurfoundation.org/news/a-new-textiles-economy-redesigning-fashions-future-download-the-report-infographics>

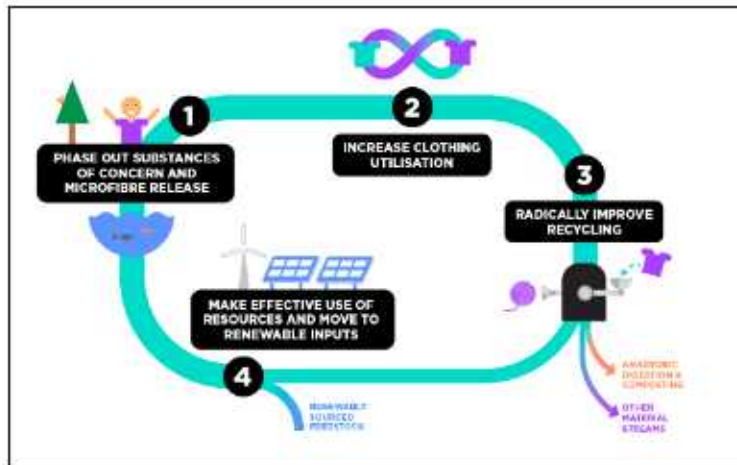


Figure 5

We also feel it is imperative that stakeholders understand the full impact of these changes. Sustainable fabrics such as recycled polyester can sometimes be introduced in order to reduce environmental impact, but if the garments end up in landfill rather than being recycled, the problem is merely shifted and not addressed.

QUESTION 5

What industry initiatives exist to minimise the environmental impact of the fashion industry?

Multiple industry initiatives exist, reflecting the seriousness with which brands like Primark take sustainability and environmental issues. As previously mentioned, we are a member of 33 of these. The decision to participate in them is not taken lightly, and each initiative is carefully considered given their significant demands on financial and human resources (see figure 3).

Primark also works with experts to deliver easy to use, intuitive management tools to help suppliers take ownership of and improve environmental sustainability performance.¹⁸

¹⁸ The Innovation Partnership set out between ADEC Innovations and Primark was established to deliver easy to use, intuitive management tools to help suppliers take ownership of and improve their environmental sustainability performance. CleanChain, an ADEC Innovation, is designed and geared to help suppliers focus on the metrics attributed to their environmental impacts, with particular respect to Input Chemistry, Wastewater and (M)RSL Testing. The initial scope of the partnership will enhance CleanChain with the tools needed by suppliers to measure performance against standards from the Sustainable Apparel Coalition (SAC), including the HIGG Index, and the commitment Primark have made to ZDHC (Zero Discharge of Hazardous Chemicals). Primark is leading the way in this new industry approach. Rather than relying on traditional manual questionnaires, assessments and audits, CleanChain will provide suppliers with tools to help them establish and reinforce best practices and proactively manage and improve their operations. Primark and ADEC Innovations have jointly committed to continuously explore and enhance this supplier toolset. Working with a company called Libryo, the Innovation Partnership are currently evaluating how best

Our View

While the depth offered by multiple industry initiatives is welcome, greater alignment regarding reporting standards and requirements is required to ensure consistency and a level playing field. Given the global nature of many fashion industry supply chains, this requires effort from multiple governments and supranational organisations.

QUESTION 6

How could the carbon emissions and water demand from the fashion industry be reduced?

Work in these areas is already ongoing. The government-backed Sustainable Clothing Action Plan, of which Primark is a member, has yielded results in clothing production (above 10% reduction in the three major target areas of carbon water and waste to landfill).

Work here must be accelerated through further encouragement and pressure from government to ensure the whole industry is participating.

Given the global nature of fashion supply chains, a more concerted effort is required internationally to realise significant improvements in these areas. Governments have a role to play in holding companies accountable for indirect carbon emissions and water usage by encouraging consumers to recycle; holding companies and the industry to account; and building international consensus and agreement.

For Primark, reducing carbon emissions and waste is an essential part of our strategy which will be accelerated through our work in the Cambridge Natural Capital group to create further science-based targets relevant to our size and scope of value chain.

We continue to improve the energy efficiency of our stores, offices and distribution networks to reduce greenhouse gas emissions. We have invested in energy efficiency technologies to reduce energy demand in stores, including introducing energy reduction information and control consoles in all new stores.¹⁹

to provide suppliers with the information needed to understand all their legal obligations and how changes in those regulations may affect them.

¹⁹ The Primark Energy Reduction Group is in the process of building a formal energy management system (EMS), which will comply with the globally recognised standard ISO 50001. It is being introduced in our UK and Republic of Ireland stores, offices and distribution centres and we will be seeking certification by February 2019. Following this, the scope of the EMS will be extended to cover stores, offices and distribution centres in all other European countries. Certification will allow us to meet Phase 2 of the Energy Savings Opportunity Scheme (ESOS) regulations across Europe.

In the past 12 months Primark has invested in a variety of energy efficiency technologies to reduce energy demand in stores. These include: (i) all metal-halide luminaires in UK and Irish stores have been adapted to accept a lower power but better performing lamp, reducing long-term maintenance costs and consuming less energy. Energy consumed for lighting in these stores has typically reduced by 12 to 15%. (ii) all UK and Irish stores building management systems have been checked and reset to ensure that lighting is on the correct time schedule and air-conditioning is achieving the desired conditions (iii) energy reduction information and control consoles are installed in all new stores, providing live data on building and systems performance. We

We believe everyone in our business should understand their role in managing energy. We have provided UK and Irish stores with a new training package containing clear guidance on energy use in stores, and we plan to roll this out across Europe in 2019.

Brands and governments should help raise awareness among consumers of the carbon and water impacts associated with the washing and disposal of clothing. The Government should build on work done via the Love your Clothes Campaign which has yielded improvements since the baseline study in 2012.²⁰

Focus on Waste

In terms of environmental impact, waste is a major concern for consumers and commentators. Primark aims to generate as little waste as possible – in our own stores and in consumers' homes. Within our stores, only 0.25% of our stock is unsold and this is donated to charity partners.

We intend to reduce the amount of non-renewable material in our products, reduce packaging ratios and seek opportunities for product reuse and recycling.²¹ We have a number of key targets, including: reducing waste landfill to zero, introducing take-back schemes in all stores by 2020, influencing consumer behaviour by providing information on recycling at point of sale within all our stores, innovating product sampling to reduce impact; and reducing manufacturing waste in the supply chain.

Within our operations, we continue to reduce overall volumes of packaging by maximising secondary and tertiary packaging types through efficient product packing.

We aim to recycle cardboard and plastic waste generated in store and use our delivery trucks to return this to our central distribution centres. This has allowed us to recycle, recover or beneficially use 56,684 tonnes of cardboard, 4,234 tonnes of

continue to roll these out to existing stores where, on average, energy consumption then drops by around 18%; and (iv) we are also making improvements in our supply chain. In the Madrid and Barcelona areas we switched to using gas reducing carbon dioxide emissions by 36 tonnes and nitrous oxide emissions by 2.6 tonnes.

²⁰ Moreover LCA's show that a significant proportion of carbon and water is used during the consumer phase. Brands and governments should assist in raising awareness among consumers of the carbon and water impacts associated with washing and disposing of clothing. For example, washing at lower temperatures. The positive news is that UK householders are saving 700,000 tonnes of carbon dioxide a year by washing clothes at lower temperatures and ironing and tumble-drying them less. Other advice includes: not washing unless it is essential; air drying rather than using tumble dryers and understanding carbon emissions that arise from landfill.

Government should also build on the work done via the Love your Clothes Campaign which has already yielded improvements since the baseline study in 2012, it's also important to look at electrical appliances that are currently sold in the UK; having domestic washing machines with a three hour cycle is not an efficient use of water or energy, perhaps it is possible to at least make a short programme option on washing machines mandatory? In China the washing cycle is 30 – 40 minutes, at a temperature range of 25 to 40c

²¹ This year, we added two new dedicated Resource Recovery Units in our Dutch and Czech distribution centres, taking the total across Europe to four. In these units, we reprocess our store waste and send it on for recycling or energy recovery.

plastic and 11,460 tonnes of hangers. Overall, we diverted 94% of the waste generated by our direct operations away from landfill with this figure rising to 99.6% for our UK stores.²²

Working at wider industry level is important, and we are a member of seven initiatives specifically focused on waste reduction including the Ellen MacArthur Foundation Circular Fibre Initiative, SCAP and ECAP.

Supporting the Government

Given the committee's interest, a specific focus on waste would be a natural and welcome outcome of its inquiry. We suggest this focus highlights the need to address waste at both the production stage and the consumer/retailer end of garment life cycles.

We would also be supportive of:

- Further initiatives 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.
- A strengthening of current government initiatives such as SCAP. We have already suggested in this submission that there should be stronger alignment of national initiatives.
- Initiatives to support better alignment among consumer countries and producer governments on common goals and issues.
- Partnerships with local councils to increase opportunities for kerbside textile recycling.

Sustainable Garment Manufacturing in the UK

QUESTION 1

**How has the domestic clothing manufacturing industry changed over time?
How is it set to develop in the future?**

Exports of British textile manufacturing more than doubled between 2003 and 2013²³ and the total turnover of British textile manufacturers grew to £5.7 bn, up from a low in 2009 of £5.05 bn.²⁴ Reports of a weakening pound, a growing interest in product provenance and an ongoing desire to cut transportation times all indicate further growth in UK textile manufacturing. However, problems which must be addressed exist in this industry. The Financial Times recently undertook an in-depth investigation into

²² Primark data from 2016/2017 Financial Year

²³ <http://www.neweconomymanchester.com/media/1073/alliance-report-part-one.pdf>

²⁴ <https://www.statista.com/statistics/491114/apparel-and-footwear-united-kingdom-uk-market-value/>

textile manufacturing in Leicester and found multiple examples of small scale, opaque factory networks, with workers being paid as little as £3.50 an hour.²⁵

Our View

The conditions reported by the FT are not an isolated issue. We have experienced challenges in UK garment manufacturing, including warehouse and distribution networks that rely heavily on agency and contracted labour and sub-contracted orders. Currently, we have very little exposure to UK garment manufacturing as these issues have prevented us from sourcing more in the UK.

We have raised our concerns with UK government and the Home Office, and therefore welcome the recently announced call for evidence by the Government Office of the Director for Labour Market Enforcement. We also support existing initiatives such as Fast Forward and the Gangmaster and Labour Abuse Authority (GLAA).

QUESTION 2

How are Government and trade envoys ensuring they meet their commitments under SDG 8 to “protect workers’ rights” and “ensure safe working environments” within the garment manufacturing industry? What more could they do? Are there any industry standards or certifications in place to guarantee sustainable manufacturing of clothing to consumers?

The government has led the way in this area with regulation such as the commendable Modern Slavery Act which is part of a growing movement that has seen a significant increase in regulation across business and human rights. This has led not only to increased transparency, but also the disclosure and benchmarking of retailers' efforts to address risks within their supply chains. However, there is currently no single standard, certification or benchmark that provides a holistic benchmark or guarantee of sustainable manufacturing.

Focus on investment in Women – the Economic Growth Benefits and CO2 Reduction

We believe that sourcing from developing / low income countries, whilst challenging, creates much-needed employment in these countries, particularly for women who make up 68% of the textile manufacturing workforce worldwide.²⁶ A report by Goldman

²⁵ Dark factories; labour exploitation in Britain's garment industry. Financial Times May 17 2018

²⁶ https://www.bsr.org/reports/BSR_Empowering_Female_Workers_in_the_Apparel_Industry.pdf

Sachs states that 'one of the best environments for investment in human capital is in the hands of women'.^{27 28}

Recent evidence also shows that the most effective way to reduce carbon impact is to invest in women and children in the developing world through education and family planning. Project Drawdown (a coalition of over 200 scholars around the world) cites that the carbon savings of such investment could reduce 120 gigatons of CO2 equivalent by 2050, more than the savings from 'on' and 'offshore' wind power combined (99GT).²⁹

As such, we welcome the UK government's pioneering work on women and girls as articulated in DFID's Strategic Vision for Gender Equality: Her Potential, Our Future, (2018), and initiatives to work with the private sector to help maximise these opportunities, such as DFID's Work and Opportunities for Women programme, of which we are a corporate partner. This shared understanding is reflected in DFID's Letter of Intent with Primark (2015) which notes Women's Economic Empowerment as one of its shared objectives.

In recognition of the complexity of issues related to women's empowerment across the many countries from which we source, we have developed a bespoke programme of support [in each country]. This is delivered largely by local partners and underpinned by our teams on the ground who have the language and cultural skills required to bring about grassroots change.

We have developed a framework to guide this work: providing workers with the skills and knowledge to understand their rights; creating opportunities for increased earning potential; helping to facilitate access to welfare-enhancing services and supporting workers in voicing their needs and concerns. We also work with factories to ensure that they have the right management systems in place and promote workplace behaviours that are conducive to positive outcomes for workers.

We currently operate 17 projects through 20 external partnerships in Bangladesh, India, Pakistan and China, reaching over 200,000 workers and farmers, which will increase to over 220,000 with the launch of our sustainable cotton programmes in Pakistan (see figure 5).

²⁷ As the number of women in the workforce rise, countries gain a 'double dividend' as they are more like to spend money on goods and services that directly improve the lives of their families, this in turn further develops human capital and economic growth <https://www.goldmansachs.com/insights/public-policy/gmi-folder/gmi-report-pdf.pdf>

²⁸ Bangladesh, a country where Primark is heavily invested is set to reach upper middle income country status by 2021 in large part due to the Ready Made Garments (RMG) sector https://www.bsr.org/reports/BSR_Empowering_Female_Workers_in_the_Apparel_Industry.pdf

²⁹ <https://www.drawdown.org/solutions-summary-by-rank>

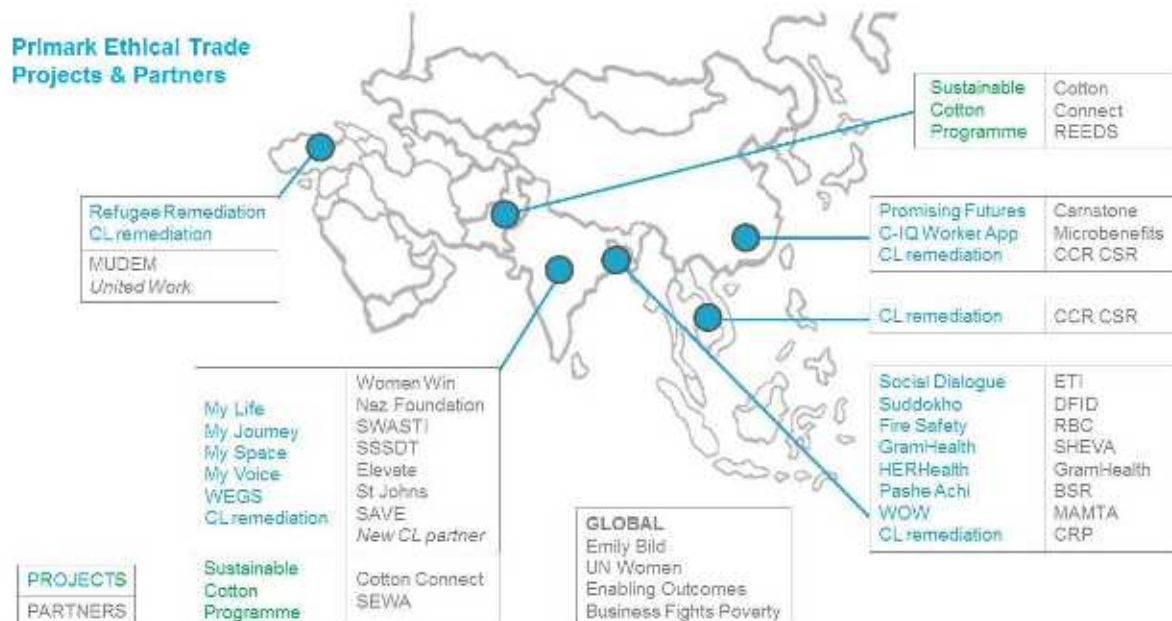


Figure 6

We see a specific and valuable role for government support in four broad areas:

Fostering Collaboration

Government can foster collaboration among different businesses working on the same issues in the same countries. While industry collaboration is improving, government can help facilitate this through individual initiatives or through its support of membership bodies such as the Ethical Trade Initiative and Business Fights Poverty. Government can also facilitate access to its extensive networks of experts, NGOs and business organisations across sourcing countries.

Research

As recognised by DFID's Call to Action for Her Potential, Our Future, there is a need for evidence generation to track progress and set goals. Government can create significant value by commissioning independent high-quality, publicly available research on industry-wide issues. DFID's support to the British Academy on modern slavery research is one such example of this.

Facilitating Government Dialogue

Government has unparalleled access to and understanding of the way in which governments work in sourcing countries. This could be leveraged to facilitate dialogue on key issues, for example the regulation of recruitment agencies and international migration of workers, which are of vital importance to progress in tackling modern slavery and forced labour in global supply chains.

Building Capacity

The UK government is a world leader in helping to build capacity in developing country governments and institutions. Countries across the global sourcing map would benefit

from more robust domestic regulation, strengthening the implementation of existing legislation. It is also important that local organisations supporting women's rights and equality have the technical expertise and capacity to work effectively with the private sector. In this context, the work of DFID in countries like Bangladesh and Burma is extremely valuable. We would welcome an extension of this type of support to other sourcing countries that may fall outside of DFID's traditional geographical remit, such as Turkey, India, Vietnam and Cambodia.