

Ms Mary Creagh
Environmental Audit Committee
House of Commons
London
SW1A 0AA

12th October 2018

Dear Ms Creagh,

I am writing in response to your letter published on Parliament's website on 5 October 2018.

Following our initial evidence submission in September 2018, Primark welcomes the opportunity to provide further information to the Environmental Audit Committee's inquiry into the sustainability of the fashion industry. This letter reiterates and builds on some of the points made in our evidence previously provided to the committee.

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. We offer 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 our sales come from 'basics' such as socks, underwear, and t-shirts.

The company was established in 1969 in Dublin under the name Penneys, 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.

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.

Below we have addressed the specific questions posed in your recent letter.

Yours sincerely,



Paul Marchant
Chief Executive

1. Are all the garment workers producing the clothes you sell paid a living wage? What steps have you taken to ensure that child labour is not used in your supply chain?

We have stringent policies in place stipulating that workers in our supply chain are paid fairly, and we strictly prohibit the use of child labour in the manufacturing of our products. We do not know of any child labour in our supply chain, but we are acutely aware of the risk.

At Primark we do not own any factories. We choose and approve factories and suppliers who manufacture products on our behalf. Factories which produce clothes for Primark must meet the Primark Code of Conduct as a condition of doing business with us. This Code requires that wages be paid in line with a sourcing country's law or the industry benchmark – whichever is highest – and that wages should always be enough to meet basic needs and provide some discretionary income. In addition, the Code requires that there is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour. The full Code is available on our website. <https://www.primark.com/en/our-ethics/code-of-conduct>.

We are very rigorous in our approach to standards and only work with factories that can achieve the levels we require. We require every supplier and factory making products on Primark's behalf to commit to meeting the internationally recognised standards set out in our Code of Conduct prior to orders being placed. We audit every factory at least once a year, sometimes more, to check whether the standards in the Code are being met. It is the job of our Ethical Trade and Environmental Sustainability Team, a group of more than 100 experts based in key sourcing countries, to monitor compliance with the Code. The team carries out over 3,000 audits per year.

Primark has long been supportive of annual increases in the minimum wage in its key sourcing countries. We recognise that collaboration with all relevant stakeholders is imperative if we are to effect change and make an impact on living wages beyond our direct influence. To this end, we are a founding member of Action, Collaboration, Transformation on Living Wages (ACT), an initiative between international brands, manufacturers and IndustriALL global trade union to support fairer wages across the textile and garment supply chain through industry-wide collective bargaining and responsible purchasing practices.

As mentioned above, we strictly prohibit the use of child labour in the manufacturing of our products. We do not know of any child labour in our supply chain, but we are acutely aware of the risk. If it were to be found however, we have robust procedures in place which would include ensuring the affected individual is put back into education with ongoing financial support. We would also provide additional training and practical support for the factory on HR systems including recruitment and documentation checks. Our procedures have been developed in partnership with the International Labour Organisation International Programme on the Elimination of Child Labour (ILO-IPEC), and we are a member of the ILO-IPEC Child Labour Platform, a global cross-sector group that aims to understand and share best practice.

We also work with local grassroots partners and international experts to help us understand where the child labour risks are in international supply chains. With their support we are able to address this important issue and educate suppliers, workers and communities on the importance of education for children. This is something we have built into existing programmes such as our work with SAVE, a grassroots NGO in Southern India, which brings local people together to form Worker Education Groups to discuss issues that matter to them in the workplace and beyond.

2. What is the average life cycle of the garments you sell?

The durability of any given product is dependent on numerous factors, including to a significant extent how customers care for their clothes after purchase. We want our items to be a good fit, to wash and wear well, and be worn time and time again. To this end, durability is one of the three pillars of our quality strategy, along with fit and product compliance.

We carry out extensive testing on garments to help ensure they meet these standards. Our tests have been developed with the support of six internationally recognised testing houses and are in accordance with industry standards. For example, we test products for their appearance after multiple washes and grade this on around 16 metrics including colour change, fraying of fabric and trims, detachment of fastenings, unravelling in stitching and so on. We also test products for fibre loss and pile shedding.

It is important to note that we share 98% of our third-party production sites with other high street retailers, including luxury brands. "Fast" or value fashion is not necessarily any less durable or long-lasting than much higher-priced products. Primark offers affordable clothing across the UK to customers including in poorer regions; longevity of garments is important to those who purchase value clothing on a tight budget.

3. What steps are you taking to reduce the environmental and social impact of the products you sell? Do you audit this? How do you measure progress towards reducing the environmental impact of the products you sell?

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. We also aim 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 commitment to managing environmental impact (2014) and has invested significantly in developing an Environment Management Strategy that supports the Sustainable Development Goals. As noted in our previous evidence submission to the Environmental Audit Committee's inquiry, this strategy has six key focus areas covering Responsible sourcing; Resources and waste; Water efficiency and conservation; Chemicals and pollution management; Energy efficiency and GHG emissions, and Animal welfare and biodiversity.

The objectives 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.

During 2017, we worked with global professional services firm CH2M (now Jacobs) to develop an updated environmental policy. The policy sets out environmental priorities and objectives for our business which have been informed by the in-depth analysis of existing direct (from our stores and operations) and indirect (from our product supply chains) environmental impacts.

This new environmental policy is supported by an environmental management system aligned with the internationally recognised ISO 14001:2015 standard. This is designed to help Primark identify where we should intervene to mitigate the most salient environmental risks, as well as act to

promote environmental conservation opportunities. Working closely with operations and supply chain partners, a global team of technical environmental specialists is responsible for implementing this policy; we measure and report on our progress externally. Our most recent Environmental Sustainability Performance report through which we also report on our commitments to Greenpeace Detox can be found here: <https://www.primark.com/-/media/ourethics/detox/pdfs/detox-report/primark-detox-environmental-performance-report-2018.ashx>.

4. What recycled materials, if any, do you use in your products? What could the Government do to encourage greater use of recycled materials in clothing production?

We use recycled polyester in our ladieswear range and are currently expanding this to other product categories including workout, trousers and socks.

In 2016 we successfully launched a customer Take Back scheme pilot in five stores (in the UK and Germany), where we encouraged customers to recycle their textiles and shoes in store. Following this successful pilot, we are now scaling up the programme to all stores and are in the process of obtaining the appropriate licenses in order to do so.

As set out in our previous evidence submission to the Environmental Audit Committee's inquiry, we would welcome the introduction by the government of compulsory take-back schemes for textile retailers to ensure that clothing is recycled responsibly. In France, for example, the government has proposed regulations which would prohibit the incineration of unsold stock and require unsold clothing to be donated to recycling organisations or charities.

On a local level, a partnership with councils to increase opportunities for kerbside textile recycling would be welcome.

We would also welcome a strengthening of current government initiatives such as SCAP (Sustainable Clothing Action Plan). As noted in our previous submission, we believe there should be stronger alignment at the international level of different countries' national initiatives on this subject to ensure consistent and strong programmes as well as recognised measurement standards. We would also like to see consumer countries and producer governments aligning better on common goals and issues.

5. Is your company taking action to reduce the risk of microplastics being washed into the ocean? If so, what actions have you taken?

Primark has had a ban on any new products containing microbeads since 2015 and we can confirm that all Primark own brand products are now free from microbeads. On fibres, we are working with others in the fashion industry to look at impacts and identify potential solutions.

For example, we are a member of the Microfibre Consortium, consisting of the European Outdoor Group with partner University of Leeds. This project is conducting scientific research into which fabric types shed more fibres than others and how fibres are released.

We are also a member of Industry Acting on Microfibres, which comprises nine organisations across the full lifecycle of a microfibre supported by research and industry expertise from the University of Leeds and the Chartered Institution of Water and Environmental Management. Like the Microfibre

Consortium, it aims to establish an evidence base to drive solutions, while building consensus and galvanising the wider industry.

Scientific research into the spread and effect of microfibres is still in the early stages and we acknowledge that there is much work to be done on this issue by Primark, the wider industry and other stakeholders. We believe our active engagement in the two initiatives outlined above is a critical start towards creating solutions to address microfibre pollution and we are committed to continuing this work.

6. Are you taking any action to encourage reuse, repair and/or recycling of clothing? What do you recommend your customers do to dispose of your products responsibly?

As noted above, in 2016 we successfully launched a customer Take Back scheme pilot in five stores, where we encouraged customers to recycle their textiles and shoes in store. Following this successful pilot, we are scaling up the programme to all stores and are in the process of obtaining the appropriate licenses in order to do so.

We would welcome government efforts to make it mandatory for clothing retailers to operate such schemes and, at a local level, we would support an increase in opportunities for kerbside textile recycling.

The latest report from WRAP shows that UK 'shopping habits have a lot more scope to be smarter and more sustainable' and that there is currently an intention-action gap. It also shows that in the UK people now lack the skills required to repair clothing. We therefore think it is important to encourage UK consumers to ask questions about the products they buy and seek out information.

7. Do you incinerate unsold or returned stock? What percentage of your sales are online? What do you do with e-commerce returns?

We do not sell our products online and therefore have no e-commerce returns policy.

Primark does not incinerate leftover stock. Unsold products and samples in Europe are donated to Newlife, a charity, which collects, sorts and recycles them to raise funds. In Europe we have been donating all our unsold clothing and buying samples to Newlife since 2010 and our partnership has so far raised €3 million. Newlife provides support for disabled and terminally ill children and their families by funding equipment and specially trained nurses to help with children's care.

In the USA we partner with a not-for-profit organisation called K.I.D.S./Fashion Delivers. Our U.S. stores donate unsold clothing to the organisation, which then redistributes the items to those in need around the world, for example victims of natural disasters.