

The Primark Circular Product Standard

Version 1.0 | 2023



Foreword

Nicholas Lambert
Circular Product Lead



“A Circular Economy begins with good design.” The Ellen MacArthur Foundation

It was these words that helped to inspire and focus our ambition as we set out to create Primark’s Circular Product Standard (CPS) more than two years ago. Primark’s CPS is a set of design principles that will live and grow within our business as we strive to give our clothes a longer life. It’s built on the vision for a circular economy for fashion by the [Ellen MacArthur Foundation](#), a global thought leader on circularity, and by climate action NGO WRAP. These principles are part of the overarching Primark Cares strategy, our ambition to offer more sustainable fashion that is affordable for all.

To help translate theory into practice, we’ve worked extensively with designers and buyers across Primark, while also consulting with suppliers and industry experts.

Last year, we tested the CPS with some of our Product Teams and key suppliers and their feedback proved invaluable in helping us get to this point today.

To take this forward, we’re launching a bespoke circular design training programme later this year which will educate more of our Product Teams and key suppliers on the theory and practice of a circular economy. The CPS sits at the heart of this, helping to enable its application across our business, from design to the making of our clothes. The CPS also supports our customer education programme on clothing repair and our efforts to improve the durability of our clothes.

Overall, we hope that the CPS will provoke a broader discussion within the industry so we that can agree on the definition of what makes a circular product and discuss how we can integrate circular design in every business within the fashion industry, in addition to sharing opportunities and challenges in this space. We also hope it will support future legislative decisions around eco-design in the key territories we currently operate in, including the EU, UK and US.

Personally, I’d like to thank all my colleagues, suppliers and partners that supported our ambition to drive this forward. This includes our industry partners – the circularity think tank Circle Economy and the non-profit sustainability educator Sustainable Fashion Academy, in addition to the Ellen MacArthur Foundation (EMF).

To move a business the size and scale of Primark isn’t easy, but I am proud of where we are today. We know this is just the first step, and that we don’t yet have all the answers. But to make a fresh start, you must begin with the end in mind. We welcome and invite collaboration so that together we can learn, encourage innovation, and support our ultimate ambition that old clothes can become new clothes. As this space continues to evolve and move forward, we plan to update our CPS periodically and we look forward to sharing our progress with you all.

Nicholas



A circular product; a definition inspired by our partner the Ellen MacArthur Foundation, circular products are made from recycled or more sustainably sourced materials and **designed with the future in mind** – meaning they have a longer lifespan when in use and can be **recycled into new materials** or new clothes.

Contents

1.
The Circular
ecosystem

What and
why?

2.
Primark
Cares

Becoming a
more circular
business

3.
The Circular
Product
Standard

Introduction
and the
framework

4.
Embedding
circular
products

Moving
from theory
to reality

5.
Closing the
loop

Clothing
donation and
recycling

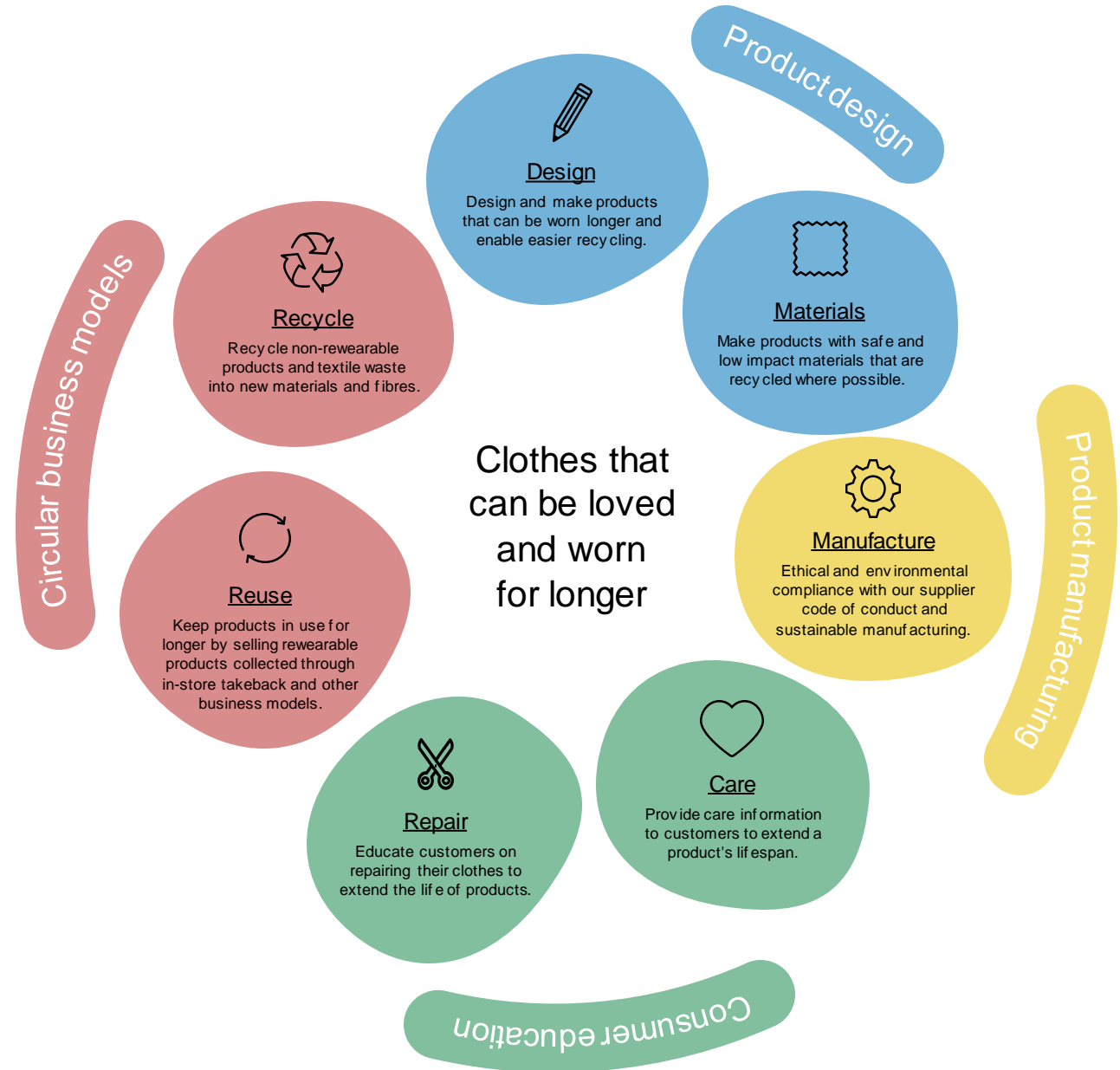
6.
Reflections

Starting with
the end in mind

The circular ecosystem

Circular product design is one element of a product's lifecycle. Our ambition is to move towards a more circular ecosystem. This ecosystem demonstrates the importance of collaboration to drive real change and deliver impact. We know we've a lot more to do but we're making progress in a number of stages of a product's lifecycle.

The technology in this space is changing all the time and opening new possibilities for the circular ecosystem. While scalable models relating to some of our commitments in this space do not exist yet, we're optimistic that in the next few years there will be new solutions that we can adopt.



Circular products sit at the heart of our product pillar commitments within our Primark Cares strategy.

Giving clothes a longer life

We will become a circular and more sustainable business

Affordable clothes designed to last

We will strengthen the durability of our clothes

By 2025

Clothes That can be recycled

Our clothes will be recyclable by design

By 2027

Clothes made from recycled fibres

All our clothes will be made from recycled or sustainably sourced materials

By 2030

Protecting life on the planet

We will nurture nature, halve carbon emissions and eliminate waste

Halve our carbon footprint

We will halve carbon emissions across our value chain

By 2030

Eliminate non-clothing waste

We will eliminate single-use plastics and all our non-clothing waste

By 2027

Restore bio-diversity

Our Sustainable Cotton Programme will use more regenerative agricultural practices

By 2030

Improving people's lives

We will protect and improve the livelihoods and resilience of the people who make our clothes

Create financial resilience

We will pursue a living wage for workers in the supply chain and support with financial literacy training and access to social protection

By 2030

Promote equal opportunities for women

We will strengthen the position of women through skills development and addressing barriers to progression

By 2030

Improve health and wellbeing

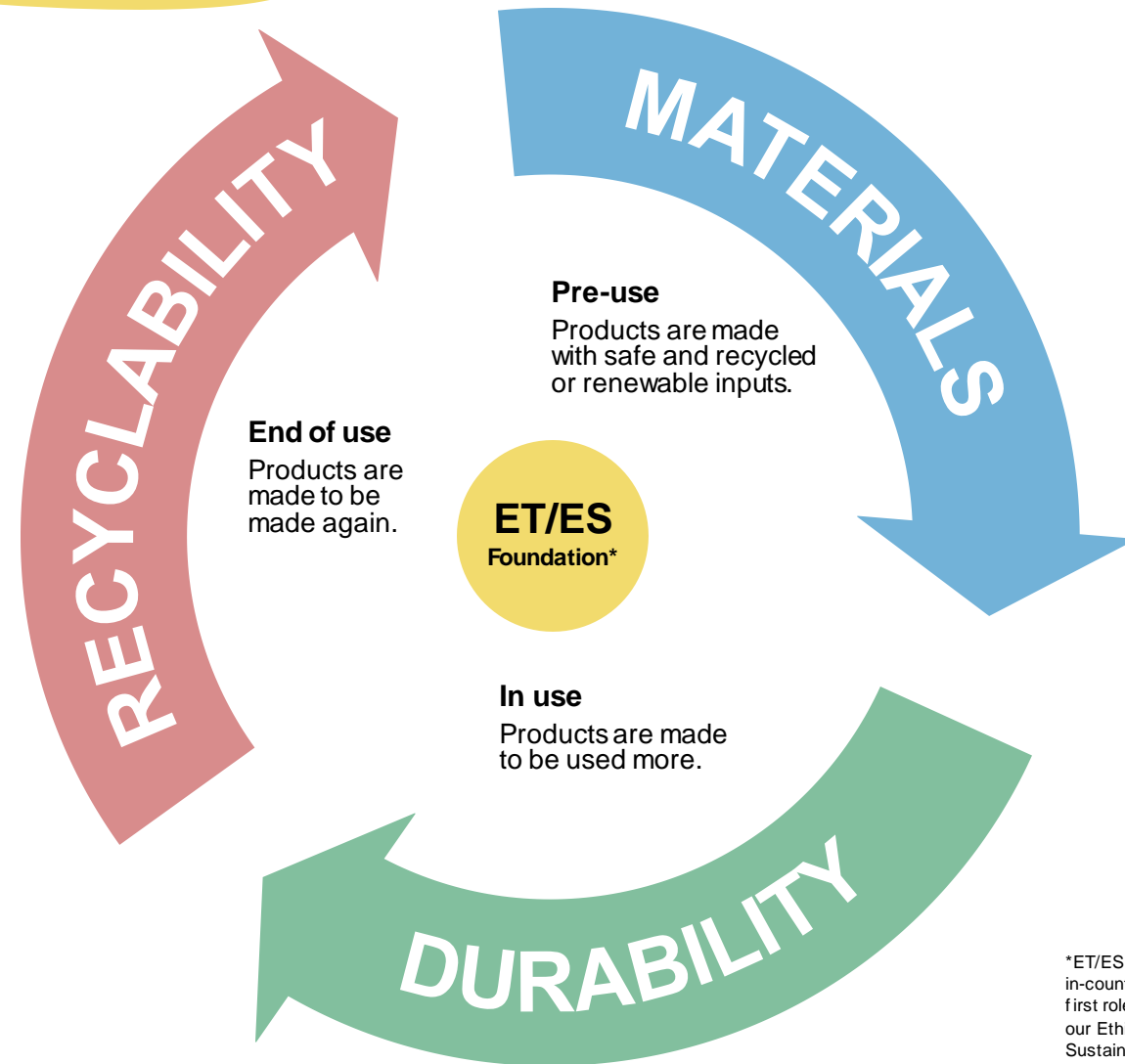
We will ensure access to effective grievance processes and widen access to help for mental and physical wellbeing

By 2030



How do we define a 'circular product'?

For too long the linear economy has meant that garments are made, used and discarded. Achieving a truly circular economy for fashion will require a total mindset shift, for us as a fashion retailer, in addition to our suppliers, and our customers too.



*ET/ES Foundation: We established our in-country Ethical Trade team with the first role in China in 2007. Now known as our Ethical Trade and Environmental Sustainability (ET/ES) team, it consists of over 130 people based in 12 of our key sourcing markets. They act as our 'eyes and ears' on the ground. Our Code of Conduct is the bedrock of this team and compliance with it is monitored by our ET/ES team. Read more [here](#).

Our ambition for circular products

Our ambition is that circular products are designed and created with the future in mind, so that our clothes can be worn and worn again, and then given a new life into new materials or clothes once our customers are done with them. For us, currently, circularity also means relying less on new materials to make our clothes at the start and using more sustainably sourced materials, such as cotton sourced from our [Primark Sustainable Cotton Programme](#). Finally, circularity means a greater focus on durability and testing all our circular products to our new enhanced durability wash standard.

This shift from a linear economy will enable the fashion industry to optimise resources and minimise waste across a product's lifecycle, because the least sustainable product is one that is not worn. There is no one-size-fits-all approach to implementing this approach and it will take time, collaboration and creativity to drive this at scale across the business, particularly given the diversity of products that we offer.

However, we're committed to progress this definition over time as we evolve our CPS.

Read more about how we define materials under Primark Cares in our [glossary](#).



The Circular Product Standard

The Circular Product Standard (CPS) is a framework that outlines what constitutes a ‘circular’ product, as aligned with the **EMF vision for a circular economy for fashion**. In simple terms, this means that a product should be made using recycled or more sustainably sourced fibres, should be designed for physical durability, and should be designed to be commercially recyclable.

	Materials	Durability	Recyclability
EMF Principle	Made from safe and recycled or renewable inputs	Made to be used more	Made to be made again
What this means at Primark	Designed with recycled or more sustainably sourced fibres	Designed for physical durability	Designed to be technically recyclable at commercial scale
	At present, 45% of clothes sold at Primark are made from recycled or more sustainably sourced materials, with our ultimate goal to ensure all our clothing is made from these materials by 2030. Over time we aim to integrate recycled fibres into our future circular collections which supports our partnership with Recover™, a leading materials science company and global producer of low-impact, high-quality recycled cotton fibre and cotton fibre blends.	There is currently no single recognised standard for durability across the fashion industry. We want to help change that so consumers can be assured that what they buy will last, no matter how much they can afford to spend. This supports our commitment to strengthen the durability of our clothes by 2025. To do this, we are working with WRAP as a signatory to its Textiles 2030 initiative which is bringing businesses together to create a uniform guideline for durability. Through this work, we've developed a new enhanced durability wash standard using a framework based on WRAP's Clothing Longevity Protocol . We have tested all of the denim and jersey in our pilot collection to 30 and 56 washes respectively (in line with the WRAP Clothing Longevity Protocol).	While there is no universal definition of 'recyclability' in clothing and textiles, the recyclability of a product is dependent on both design and the availability and capability of current recycling technologies. Last year, we consulted with recyclers to further understand their processes and input requirements for products at the end-of-life. As a result of these consultations, the recyclability requirements of our CPS meets the specifications of cotton recycling technologies that are currently available. These criteria will change as and when current recycling technologies evolve, or new technologies come to market.

The Circular Product Standard

We've developed three levels within our CPS to enable and encourage progression over time. These levels are defined as **Foundational**, **Progressive** and **Aspirational**. Over time, we will develop more specific requirements and criteria for the other two levels, which will be influenced by technical and material innovation, in addition to alternative design-led solutions in product development. Underpinning all this is **compliance** within our business – this represents current practice that exists within our business and the industry, and supports the implementation of our CPS at any level.

	Materials	Durability	Recyclability
EMF Principle	Made from safe and recycled or renewable inputs	Made to be used more	Made to be made again
What this means at Primark	Designed with recycled or more sustainably sourced fibres	Designed for physical durability	Designed to be technically recyclable at commercial scale
Compliance	Current minimum requirements and practices within our business and the industry that support and enable each of our circular product criteria.		
Foundational	What we believe is realistic and achievable today and is the minimum criteria of a circular product through simplification and minimisation. We recognise that the Foundational level isn't an end point and there's more to do to drive change. For example, most of our clothes contain polyester stitching thread, which can be an inhibitor for recyclers, so there is more we must do to encourage a shift in our business here.		
Progressive	The level where products are created and adapted to be made from one single fibre composition or 'mono-material', including all the fabrics and trims.		
Aspirational	In addition to the above, innovative and creative new design strategies are used alongside technical & material innovation, to support the highest standards of durability and to enable maximum recyclability.		

The Circular Product Standard

This framework is a first edition of our Circular Product Standard. It is designed to be iterative, and adaptable to (and made more specific for) different product types.

	Materials	Durability	Recyclability
EMF Principle	Made from safe and recycled or renewable inputs	Made to be used more	Made to be made again
What this means at Primark	Designed with recycled or more sustainably sourced fibres	Designed for physical durability	Designed to be technically recyclable at commercial scale
Compliance	Meets Primark's Restricted Substance List (RSL) limits (includes MRSL)	Meets one and five multi appearance wash	Care label with fibre composition declared
Foundational	Main fabric made using cotton from Primark's Sustainable Cotton Programme (PSCP), and/or recycled cotton, and/or organic cotton.	Product meets the foundational level of wash and performance test requirements as detailed in Primark's enhanced durability wash standard.	Fabrics made from 100% cotton. Care labels and stitching thread made from 100% polyester. Essential functional trims only. No hard decorative embellishments (i.e., rivets) where possible, and no prints or coatings.
Progressive	Main fabric made using cotton from our PSCP and/or recycled cotton, and/or organic cotton. Main fabric or product also made using lower impact wet processes.	Product meets the progressive level of wash and performance test requirements as detailed in Primark's enhanced durability wash standard.	Fabrics and textile components made from 100% cotton, including care labels and stitching thread. Essential functional trims only. No hard decorative embellishments (i.e., rivets) where possible, and no prints or coatings.
Aspirational	Main fabric and textile components made using cotton from our PSCP and/or recycled cotton, and/or organic cotton. Main fabric or product also made using lower impact wet processes.	Product meets the aspirational level of wash and performance test requirements as detailed in Primark's enhanced durability wash standard.	Fabrics and textile components made from 100% cotton, including care labels and stitching thread. Essential functional trims are removable or recyclable without affecting the durability of the product. No hard decorative embellishments (i.e., rivets) where possible, and no prints or coatings.

Circular products: theory into practice



Our denim and jersey Product teams have trialled our CPS to design and make an initial product collection.

The support and engagement of both product teams and suppliers is critical to scaling circular products – so although we are starting with an initial collection to test and demonstrate these principles (and to understand what works, and what doesn't), our intention is to keep embedding these principles and to keep scaling the products that result from this.

Here are two examples from the collection.



Case studies

Wide leg jean



Relaxed fit t-shirt



	Materials	Durability	Recyclability
Wide leg jean	Main fabric is made using cotton from our sustainable cotton programme	Item has been tested to 30 washes and passes our foundational requirement	Main fabric is 100% cotton Pocket Bag is 100% cotton Interlining is 100% cotton Stitching thread is 100% polyester Care label made from 100% polyester Total estimated product composition is a minimum of 95% cotton (inclusive of all trims & components) Rivets replaced with Bartack stitching
Relaxed fit t-shirt	Main fabric is made using cotton from our sustainable cotton programme	Item has been tested to 56 washes and passes our foundational requirement	Main fabric is 100% cotton Neck rib is 95% cotton, 5% elastane Stitching thread is 100% polyester Care label made from 100% polyester Total estimated product composition is a minimum of 95% cotton (inclusive of all trims & components)

Where feasible, we have removed woven labels and replaced them with printed labelling, for example, by using a small back neck/waist print instead of a woven label. To meet legal requirements around labelling, we've kept care labels sewn into the garment. These are synthetic to ensure that key information is legible post-wash. We're also printing more specific instructions on recycling, repairing and re-wearing these products on the internals of jeans, where technically possible. On t-shirts, a small back neck print encourages our customers to 'rewear, repair & recycle' this t-shirt.

Validating circular products

We consciously designed the CPS so that we can measure all elements of the framework, combining industry tools to support internal validation.

For each principle, we have developed or adopted tools and systems so that we can be confident a product meets the requirements set out in the CPS.



Materials

We're validating this by using third party certification to validate recycled and organic materials. PSCP cotton is grown according to CottonConnect's [REEL code](#). Read more in our [glossary](#).



Recyclability

We're validating this by using a Bill of Materials (BOM) calculator. We developed this tool to determine the total weight of all components and fibres within a product and the total percentage of cotton within a product.

Products are also visually assessed for recyclability disruptors. We recognize there is more we can do to streamline this and welcome further industry-level discussions to more clearly define and measure a 'recyclable' item of clothing.

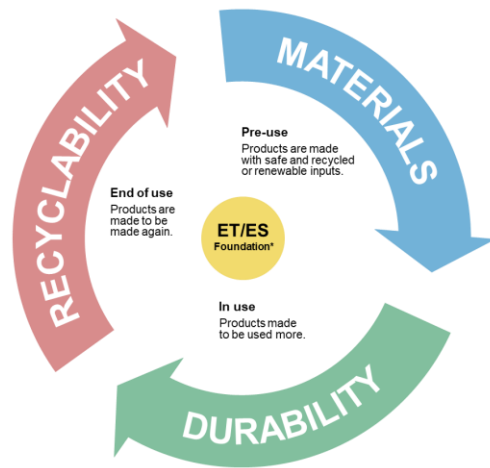


Durability

We're validating this by using accredited third-party labs to test all our products to industry recognised appearance wash and performance testing using the extended durability wash standard.

Our circular product toolkit

What? The Framework
Circular Product Standard



How? The Product Criteria
Circular Product Design Guidelines



Turning Theory into Practice
Circular Design Training



Embedding circularity in Primark



Circular Design Training

Last year, we began working with Circle Economy and the Sustainable Fashion Academy to pilot a **Circular Design Training Programme** for a selection of buyers, designers and key suppliers. Using the principles of the CPS, we tested and evolved our standard to ensure it worked for our business. We are launching this CPS with a commitment to train all our product teams in circular design principles over the next year.

Circular Product Design Guidelines

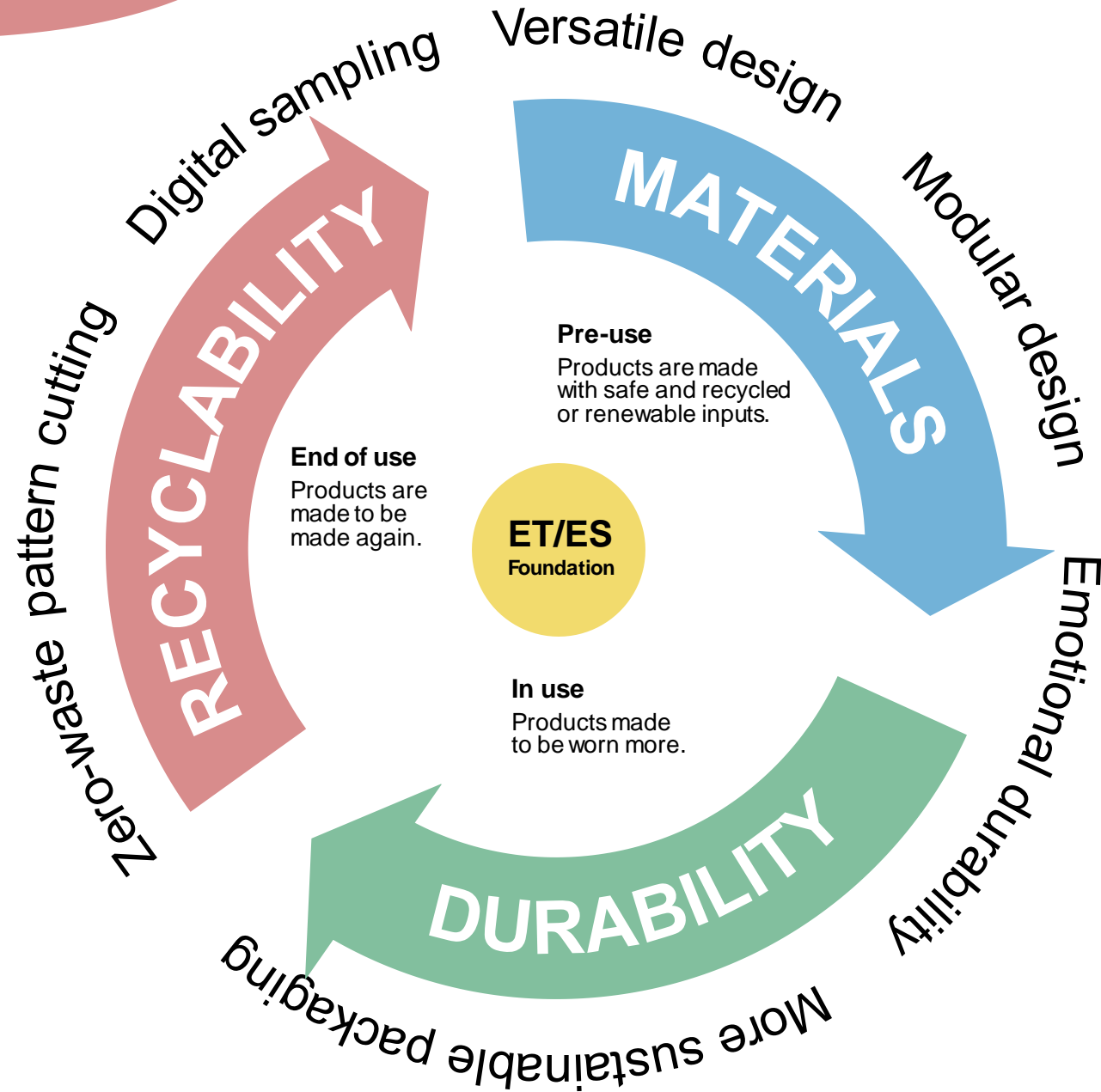
The ultimate output of our training programme is to develop specific, tailored **Circular Product Design Guidelines** for each product category, so that Product Teams can design circular products. We started with denim and jersey in our first collection launch, and we will be publishing these design guidelines in due course before developing guidelines for other product categories in the future.

Circular Products

We are proud to be launching our first **circular product collection** alongside this CPS. This collection is made up of 35 pieces across menswear, womenswear and kidswear, and is comprised of stylish wide leg and relaxed fit denim jeans in light washes, transitional denim overshirts and essential relaxed-fit t-shirts.

Additional design strategies

We recognise there are **additional design strategies** which, whilst not central to the CPS would be encouraged for adoption alongside the CPS. More details on these additional design strategies can be found in our [glossary](#).



Circular design training

The CPS is the theory. To turn this theory into reality, we need to bring the entire business on this journey.

Over the last year we piloted our CPS by developing and rolling out circular design training to 24 members of our product teams, and six of our suppliers. Our first collection is the output of this training.

We plan to extend this training to our entire product team of over 500 colleagues in head office, plus further selected suppliers this year and beyond.

This unique blended learning programme has been developed in conjunction with Circle Economy and the Sustainable Fashion Academy. It combines self-guided digital learning with workshops and face-to-face design sprints and consists of three levels.



Circular design training

Foundation	Masterclass	Expert
Mandatory for product teams. Optional for other colleagues.	Mandatory for clothing product teams. Strategic suppliers selected to join.	Mandatory for clothing product teams. Strategic suppliers selected to join.
This is a self-guided digital module developed by the Sustainable Fashion Academy that explains the broad concepts of circularity, the principles of a circular ecosystem, and more specifically how this applies to the fashion and textiles sector. It will be available on our digital learning platform.	This is a workshop led by Circle Economy, designed to create a safe space for our colleagues to interrogate circular principles and design concepts, and to start thinking about how these principles might apply to their product areas.	These are a series of design sprints led by Primark and supported by key suppliers designed to deep-dive into these principles in reality. Ultimately, our colleagues will co-create Circular Product Design Guidelines for each product area that can then be used to create circular products.

Closing the loop

To turn old garments into new, there are two primary methods of textile recycling – mechanical and chemical. Each of these require different considerations dependent on the desired output, including the number of "disruptors" to the recycling process such as prints, buttons, fastenings, in addition to the colour of the initial material too.

While our recyclability criteria fits the requirements for both recycling methods, a key inhibitor right now is the lack of availability of commercial recycling facilities at scale. Capacity is growing, and longer term we hope that we can partner with a recycling facility to turn our customer's old clothes into new in addition to investing in technologies and fibres. For now, 65% of all Primark stores internationally have textile donation boxes where we collect unwanted clothes from customers, from any brand and in any condition.



Closing the loop

Our goal is that all clothing collected through the scheme is either re-used, recycled or repurposed. Our textile donations boxes are currently available in the UK, Republic of Ireland, Austria and Germany. We plan to extend our Textile Takeback scheme to other markets but will only do so when we can be confident our programme works with local regulations and infrastructure and for the customers in the countries where we operate.

There is also a growing network for donating, reselling and recycling clothes, made up of a variety of charities, companies, and municipal initiatives. Where the information is available, we have provided details of local initiatives [here](#).

You can also contact your local council or municipal to check what services they offer too.



Reflections

The development of our Circular Products Standard (CPS) has provoked many questions and conversations across the business and value chain, from our Product teams working in Head Office, to our valued suppliers in our sourcing markets. We don't have all the answers today. However, we fundamentally believe in progress over perfection, and our commitment to making more sustainable fashion affordable for all remains firm. In the spirit of collaboration, we wanted to share some learnings from our journey.

We recognise that each product type has its own unique properties and challenges. Instead of trying to apply a one-size-fits-all approach, our intention is to create and adopt Circular Design Guidelines for each product type (starting with jeans and t-shirts).

The technology does not exist today for all fibres and blends to be recycled, and in addition every recycler has different requirements. This has challenged our Product teams to think outside the box. Although we currently define a circular product as being one made primarily from cotton, we recognise that this has to expand as textile recycling capabilities evolve and scale.

We also found that changing trim compositions can affect the durability of a product. We worked through various iterations and adaptations of the products in our first collection to ensure we could deliver something that would look and feel like Primark.



Originally, we set recyclability requirements that the total composition of product should be at least 98% cotton, with an allowance of 2% for other compositions (such as stitching thread and care labels). Whilst in most cases this was possible, meeting these requirements can be challenging, particularly on denim where the amount of stitching thread used in a single pair of jeans can be significant. To resolve this, we have isolated and specified the parts of a garment that should be cotton and consistent with the main fabric (such as the pocket bag and interlining when used in jeans) and those that should remain polyester/synthetic (stitching thread and care label). The primary reason for allowing the use of polyester stitching thread is to ensure the durability and performance of a garment, and with the understanding that many textile recyclers will have a small tolerance for contaminants like this (or will otherwise manually remove).

The majority of products from our first collection, resulted in a total product composition of 98% cotton and 2% other compositions when assessed via the BOM (Bill of Materials).

However, one of the denim styles, which is made entirely from cotton, with polyester care label and thread - did not meet this threshold. As a result, we opted to change the foundational requirement to 95% cotton, 5% other compositions. This continued trade-off between recyclability and durability is one that we will continue to navigate as we develop more specific Circular Product Design Guidelines for each product type.

We know that this landscape is evolving fast, particularly with **new legislation on the horizon**. Our CPS is designed with this future legislation in mind, but with much of it still under development we are committed to update this periodically. As a result, the CPS is designed to be progressive and iterative, because we do not have all the answers yet and some criteria may not be technically possible yet. We need to time to address the innovation gap. The challenge also remains that there is no universal regulation on what it means to be circular. We know this can be confusing for our customers, so we want to make sure our parameters are clear in the meantime. We welcome any future legislation in this space to address this gap and to ensure a level playing field in this space.

One of the biggest lessons we have learnt from this process, is that we cannot do this alone.

Becoming a more circular business is a marathon, not a sprint. To take on the challenge we need to work closely with our peers, suppliers, wider industry partners and customers.

We're on a journey to become a more circular business and share our learnings with as many people as possible. If you have thoughts, comments, questions or feedback, we'd love you to get in touch on:

circulardesigntraining@primark.co.uk

With thanks

