

CORPORATE

PRIMARK RESPONSIBLE MAN-MADE CELLULOSIC FIBRE POLICY

We are committed to reducing our business impact on the environment. In addition to complying with environmental laws in each of the countries in which we directly operate, we also seek to promote environmentally sustainable practices and continuously improve our environmental management where possible. This includes addressing environmental concerns associated with fibre production. As part of our Primark Cares strategy, we are committed to a better, more sustainable future.¹ We take our responsibility seriously and will keep moving towards a better future for people and planet.

Background

Man-made cellulosic fibres² (MMCF) are used in Primark products, of which, a majority is viscose. If these fibres are not produced responsibly from raw material sourcing to fibre production, this can cause unintended negative environmental impacts.

Raw material sourcing

MMCF can be made from several different cellulosic feedstocks. Most commonly, wood is used as a raw material to produce these fibres. In some cases, wood can be illegally logged from ancient and endangered forests, which can cause environmental and social impacts to the local habitats/ecosystems and indigenous communities. More information can be found in Primark's Wood and Wood-derived Fibre Policy.³

Primark will work with Canopy⁴ to support conservation solutions and Next Generation Solutions, supporting the CanopyStyle⁵ initiative.

Pulp and fibre production

This cellulosic feedstock is turned into pulp then fibre, using energy, water and chemicals in the production process. To make this process more efficient, safer for workers health and the environment, we support the EU Best Available Techniques⁶ (BREFs) processes and closed-loop manufacturing standards. As a ZDHC (Zero Discharge of Hazardous Chemicals) contributor, we also encourage fibre producers to adopt the MMCF Fibre Production Guidelines.

Our position

Primark shares the concerns of our customers and industry stakeholders towards the environmental and social impacts of the raw materials and production of man-made cellulosic fibres (MMCF) outlined above.

This policy sets out the minimum requirements for our suppliers and their supply network, to ensure we minimise the impact of MMCF production on the environment.

As part of our commitment to a better, more sustainable future, we also encourage the use of feedstock from alternative sustainable resources including textile waste⁷ or agricultural residues (aka Next Generation Solutions).⁸

¹ Primark Cares strategy <https://www.primark.com/en/primark-cares>

² MMCF include viscose (Rayon, lyocell, modal, cupro, acetate and triacetate).

³ Available to Primark Suppliers on the Supplier Testing Portal.

⁴ Canopy is a not-for-profit organisation, working with the forest industry's biggest customers and their suppliers to develop business solutions that protect ancient and endangered forests. <https://canopyplanet.org/about-us/>

⁵ CanopyStyle initiative <https://canopyplanet.org/campaigns/canopystyle/>

⁶ Reference Document on Best Available Techniques in the Production of Polymers August 2007

https://eippcb.jrc.ec.europa.eu/sites/default/files/2019-11/pol_bref_0807.pdf

⁷ Post-consumer textile waste must be certified by Textile Exchange's Global Recycled Standard or Recycled Claim Standard.

⁸ Canopy's definition of Next Generation Solutions <https://canopyplanet.org/solutions/next-generation-solutions/>

Scope of this policy

This Responsible MMCF Policy applies to all Primark branded products and our suppliers' network, using or producing MMCF, including raw material suppliers, dissolving pulp mills and MMCF producers.

This policy also applies to all man-made cellulosic fibres (staple and filament), including viscose (rayon), lyocell, modal, cupro, acetate, triacetate and trademarked versions of these fibres, to be responsibly sourced from raw material to fibre production and fabric/product manufacturing.

Our policy

Suppliers must source MMCF from fibre producers which meet these minimum responsible sourcing requirements. We define responsibly sourced MMCF as;

1_Raw material sourcing	Cellulosic feedstock which does <u>not</u> originate from ancient and endangered forests or which have been illegally harvested, and meets legal compliance set out in our Wood and Wood-derived Fibre Policy. ⁹
2_Pulp production	Pulp production which meets EU BAT (Best Available Techniques) emission standards and waste is recovered.
3_Fibre production	Fibre production which is produced in a closed loop system and meets EU BAT emission standards and recovery rates.

To achieve this, supply chain transparency and collaboration is paramount. Primark will request direct suppliers to declare their full MMCF supply chain (from product producer to raw material feedstock) at least once per year and will request evidence of chain of custody.

Our approach

This policy does not replace our existing requirements. It is intended to be used in conjunction with the following policies, including but not limited to; our [Code of Conduct](#), the [Environmental Policy](#) and Environmental Sustainability Requirements: Guidance for Suppliers¹⁰, Primark [Restricted Substances List](#) (RSL), and Primark's Wood and Wood-derived Fibres Policy¹¹.

Primark direct suppliers are required to communicate these policies to their upstream supply chain.

Please refer to the following page for the steps suppliers can take to meet our policy for responsible MMCF.

Continuous improvement

We will work with our suppliers and their supply network to help achieve this vision and continue to work collaboratively with industry experts working to promote best practice in MMCF production. We will periodically review this MMCF policy and continue to align our position with other industry stakeholders.

⁹ Suppliers should refer to Primark's Wood and Wood-derived Fibre Policy for full legal compliance and sustainability requirements related to responsible wood sourcing.

¹⁰ Suppliers can access this document via the Supplier Extranet.

¹¹ Suppliers can access this policy via the Supplier Testing Portal.

What can suppliers do to adhere to this policy?

	Our Policy	Phase 1	Phase 2	Phase 3
Transparency	<i>Suppliers verify where all its MMC fibres are coming from.</i>	Primark will request suppliers to declare their MMCF supply chain on request and at least once per year, providing evidence of chain of custody and compliance with this policy.		
Raw material sourcing	<i>Cellulosic feedstock does <u>not</u> originate from ancient and endangered forests or which have been illegally harvested, as stated in our Wood and Wood-derived Fibre Policy.¹³</i>	Wood pulp sourced by a recognised forest management certification scheme ¹⁴ , preferably FSC ¹⁵ (Forest Stewardship Council), if virgin materials are being used	MMCF sourced from fibre producers with a Canopy green shirt Hot Button ranking ¹⁸ rating.	Feedstock sourced from alternative sustainable feedstocks (aka Next Generation Solutions), e.g. certified post-consumer textile waste ²¹ or agricultural residues.
Pulp production	<i>Pulp production meets EU BAT emission standards²² and waste is recovered.</i>	Fibre producers declare their dissolving pulp mill	Pulp producers complete SAC Higg vFEM ²³ annually.	Pulp producers and their facilities should implement ZDHC MMCF Guidelines ²⁴ for water, air and sludge standards.
Fibre production	<i>Fibre is produced in a closed loop²⁵ system and meets EU BAT emission standards and recovery rates²⁶</i>	Fibre producers declare whether they meet EU BAT standards.	Fibre producers and their manufacturing facilities should complete SAC Higg vFEM annually.	Fibre producers and their manufacturer facilities should implement ZDHC MMCF Guidelines ²⁷ for water, air and sludge standards.

¹³ Primark's Wood and Wood-derived Fibre Policy can be found the Supplier Testing Portal.

¹⁴FSC is preferred. PEFC (Programme for the Endorsement of Forest Certification) is accepted in regions where FSC certification is not available. <https://www.pefc.co.uk/>

¹⁵ FSC <https://info.fsc.org/certificate.php>

¹⁸ Canopy Hot Button Ranking <https://hotbutton.canopyplanet.org/>

²¹ Post-consumer textile waste must be certified by Textile Exchange's Global Recycled Standard or Recycled Claim Standard.

²² EU BAT https://eippcb.jrc.ec.europa.eu/sites/default/files/2019-11/pol_bref_0807.pdf

²³ SAC Higg FEM <https://portal.higg.org/>

²⁴ The ZDHC MMCF Guideline currently applies to viscose and modal staple fibres, made from wood and bamboo only. The dissolving pulp production process will be considered at a later stage. https://uploads-ssl.webflow.com/5c4065f2d6b53e08a1b03de7/5ea9710549690bdaf9ef6cd_ZDHC_MMCF%20Guidelines_V1.0_APR2020.pdf

²⁵ Changing Markets Foundation definition, page 19 https://changingmarkets.org/wp-content/uploads/2019/12/CM_REPORT_FINAL_DIRTY_FASHION_DISRUPTED_LEADERS_AND_LAGGARDS_REVEALED.pdf

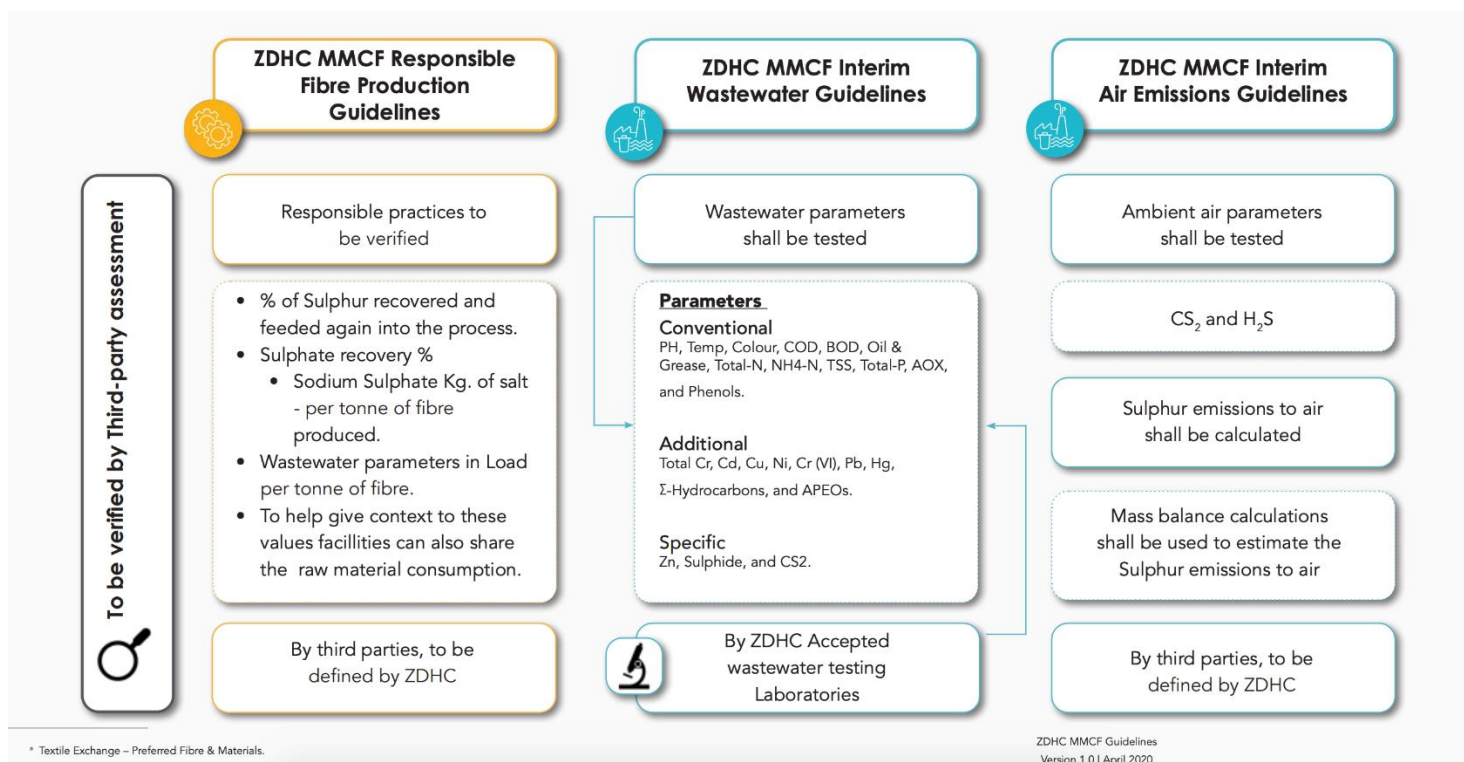
²⁶ https://eippcb.jrc.ec.europa.eu/sites/default/files/2019-11/pol_bref_0807.pdf

²⁷ The ZDHC MMCF Guideline currently applies to viscose and modal staple fibres, made from wood and bamboo only. The scope of MMC fibre types covered by this guideline will be expanded in the future. https://uploads-ssl.webflow.com/5c4065f2d6b53e08a1b03de7/5ea9710549690bdaf9ef6cd_ZDHC_MMCF%20Guidelines_V1.0_APR2020.pdf

ZDHC MMCF Guidelines

In line with our ZDHC commitment, we ask that fibre producers adopt and implement the ZDHC MMCF Guidelines launched in April 2020, which consist of 3 parts which should be used in conjunction with one another;

- ZDHC **MMCF Responsible Fibre Production Guidelines** defines a standard approach for the chemical recovery requirements and expectations for MMCF manufacturing facilities.
- ZDHC **MMCF Wastewater Guidelines** defines a standard approach for wastewater testing requirements and expectations for MMCF manufacturing facilities.
- ZDHC **MMCF Air Emission Guidelines** defines a standard approach for emissions to air linked to input chemistry for MMCF manufacturing facilities.



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Fibre producers can refer to the ZDHC MMCF Guidelines Industry Standard Implementation Approach document²⁸ to begin adopting and implementing these guidelines and to maintain compliance timelines as dictated by ZDHC.

	Foundational level	Progressive level	Aspirational level
ZDHC Responsible Fibre Production Guidelines	2021-2022	2023-2025	2025
ZDHC Interim Wastewater Guidelines	October 2021	2023-2025	2025
ZDHC Interim Air Emissions Guidelines	2021-2022	2023-2025	2025

Document reference	MMCF Policy	Document owner	Environmental Sustainability
Version	1.0	Date published	March 2022

²⁸ https://uploads-ssl.webflow.com/5c4065f2d6b53e08a1b03de7/5ede24e139a7e100f9f2a365_ZDHC%20MMCF_IndustryStandardImplementationApproach_MAY20.pdf