



London, 12 February 2019

Dear Members of the Environmental Audit Committee,

We are writing with regard to your on-going inquiry into the Sustainability of the Fashion industry, which we have been following with interest. We are concerned about one of the conclusions of your Interim Report, namely that Primark is one of the most engaged retailers on sustainability and transparency issues. Our own analysis shows that on both of these indicators, Primark is actually trailing many of its peers in the fashion industry.

Based on this assessment, our organisations, WeMove.EU and the Changing Markets Foundation, are currently conducting a campaign to encourage Primark to clean up its viscose supply chain. To date, the [petition](#) associated with the campaign has gathered over 300,000 signatures across the European Union from consumers who are concerned about the human and environmental impacts of pollution at factories supplying major European clothing brands, including Primark. In addition to this, we have launched [a parody 'ECOMARK' website encouraging Primark](#) to join other retailers and commit to cleaning up viscose manufacturing in its supply chain. As a result of this, over 3,500 people have taken action by writing to Primark to ask it to change to its sourcing practices. Unfortunately, Primark has failed to respond either to us or to their customers who have taken action on this issue.

Viscose is the third most-used fibre in the fashion industry after polyester and cotton. It is produced from wood pulp and is, in principle, biodegradable at the end of life, making it a potentially more sustainable alternative to other fabrics. However, most viscose on the market today is still being produced using heavily polluting processes. The fibre production process is largely still reliant on a number of toxic chemicals – such as carbon disulphide, sodium hydroxide and sulphuric acid – which if not managed properly, can be detrimental to the health of ecosystems and people.

Changing Market Foundation investigations in 2017 into viscose factories across Asia – presented in the [Dirty Fashion](#) report – highlighted how inadequate chemical management and water treatment had been destroying aquatic life, agriculture and traditional livelihoods, and directly exposing workers and local people to harmful chemicals, leading to severe health problems. The report also revealed that major fashion retailers were buying from polluting viscose factories by establishing direct links between some of the factories investigated and a number of major European and North American clothing brands.

With demand for viscose expected to grow significantly over the coming years, it is important that the viscose industry takes steps now to clean up production and ensures that any new capacity coming on to the market produces viscose in a closed-loop system, whereby chemicals used in the process are captured and reused. Fashion retailers and brands have a critical role to

play in this process, as set out in the Changing Markets Foundation's [Roadmap towards responsible viscose and modal fibre manufacturing](#). This document provides a blueprint for brands, retailers and producers to move towards a closed-loop viscose manufacturing system, where emission controls and chemical recovery rates are in line with industry best practices. It also places emphasis on the importance of transparency in facilitating enhanced external scrutiny and driving the fashion industry towards more sustainable production practices.

Currently, eight major brands and retailers (Tesco, Inditex, H&M, ASOS, Next, M&S, C&A and Esprit) have signed up to our Roadmap and called on their viscose suppliers to move towards closed-loop manufacturing within the established 2023-25 timeframe. In addition to this, they have also started publishing their viscose supplier lists online and reporting on progress made on tackling manufacturing pollution.

Unfortunately, Primark and several other brands that rank highly in your report (Burberry, Arcadia, Debenhams) still lag behind the market leaders by refusing to commit to our Roadmap and reveal the identity of their viscose suppliers. We have published a full overview of where different brands stand on this in this [table](#), while the latest overview of the issue is available in this [report](#).

As the significant public interest and media coverage generated by your inquiry has shown, British consumers are becoming increasingly aware of and concerned about the environmental and social impacts of clothing production. This chimes with research conducted by Ipsos MORI for the Changing Markets Foundation and published in January 2019 which shows that:

- Almost three-quarters of the UK public (74%) think clothing manufacturers should be responsible for what happens in their supply chains;
- Two-thirds of the UK public (66%) think clothing brands should provide information about their viscose suppliers and 39% would not believe a brand that said it was difficult to find out about its suppliers;
- Over half the UK public would be put off buying from brands associated with pollution or that do not pay workers in their supply chains a fair living wage.<sup>1</sup>

We would appreciate it if you could take the findings of our on-going campaign to encourage Primark and other British fashion giants to clean up viscose and modal manufacturing into consideration in your final report. We remain at your disposal for any further questions or comments.

Yours sincerely,

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<sup>1</sup> A full overview of the survey, which was carried out in 6 EU countries and the United States is available [here](#) and was covered by numerous international media outlets including [Reuters](#).