

DETOX COLLABORATION – TWO TALES: OF GREATER AND LESSER AMBITION

Taking on a Detox 2020 Commitment is a challenge, demanding the development of sophisticated technical and organizational tools, so it is not surprising that brands and suppliers have sought out ways to collaborate and help each other towards their targets. Not only that, many share the same suppliers so collaboration is an obvious solution.

A good collaboration needs to set a high level of common ambition - and provide a comprehensive framework that covers all the details and gives confidence to individual brands. To succeed, a Detox 2020 Commitment has a number of critical elements, including:

- Ensuring that hazardous chemical contamination of both inputs and releases is reduced as much as possible to **zero**, recognizing that there are “no safe levels”;
- Using a precautionary hazard-based methodology to select new chemicals for elimination;
- Creating a safety net by testing wastewater **before** it is treated - to catch unwanted sources of use and contamination.

To be effective these and other elements have to be translated into the goals and scope of any collaboration, which then needs to identify the challenges, tackle them boldly and define the steps that are needed to meet the 2020 objective. Such a forward dynamic is embodied in the “PRATO” initiative, a collaboration of Italian companies that committed to Detox in February 2016. It is unfortunately lacking in the other, more well-known collaboration of global brands: the Zero Discharge of Hazardous Chemicals Group (ZDHC Group), which has created a dynamic that encourages the lowest common denominator and is unlikely to deliver collective progress at a fast enough pace to achieve the 2020 goal.

1. PRATO, ITALIAN HEART OF A TEXTILE REVOLUTION

The Detox commitments taken over 2013-2014 by three Italian brands Benetton, Miroglio and the luxury brand Valentino, attracted considerable attention in Italy. Consequently, in February 2016, twenty companies from Italy’s Prato textile district simultaneously announced their commitment to Detox under the umbrella and coordination of their affiliate association, the Confindustria Toscana Nord (CTN). They have since been joined by seven other companies from Prato and another fifteen from other Italian locations making this move the largest Detox Commitment to date and planting the seeds of a “textile revolution”, starting in Italy, with the potential to spread worldwide.

Prato, the largest textile district in Europe (3% of European production), is home to Italy’s oldest textile manufacturers and most extensive fashion supply chain. The region exports over \$2.5 billion Euros of clothing annually to global brands including Burberry, Prada, Valentino, Armani, and Gucci. The agreement covering the twenty-seven Prato companies is reported to affect over 15 thousand tons of yarn and raw materials as well as over 24 million metres of fabric every year. Companies “represent different parts of the textile supply chain, such as factories producing yarn, fabric and raw materials, dyeing plants, yarn or fabric finishing companies, producers of chemicals for the textile industry”.



To implement their Detox commitment, the companies have access to the technical expertise and facilities of the Buzzi Institute, which is supported by the Ministry of Education, University and Research. The Institute has a specialized test laboratory which has been used by the textile industry since 1886 and provides scientific and technical support to CTN and the Detox committed companies.

The Prato District is also equipped with a wastewater plant operated by a company co-chaired by the Municipality of Prato and CTN. This company will perform the annual monitoring of the 11 priority groups of hazardous chemicals, annually until 2020.

CTN states on its website¹ “Supported and led by the association, the companies have started their improvement process through the elimination of such substances according to the transparency, prevention and precaution principles of the Detox campaign and have accepted the media challenge of the Greenpeace campaign which has rapidly changed the attention and the contents of the great fashion brands’ terms of contracts”.

Greenpeace applauds the extent of the commitment and the steps that have already been taken towards its implementation.

- **100% HAZARD-BASED:** To design its MRSL,² the Prato group has fully endorsed precautionary proactive action using the latest scientific publications and research and the most complete screening tools on hazardous chemicals, taking account of the 9 criteria set by Greenpeace (see Detox Catwalk 2016 - Criteria explained).
- **NO SAFE LEVEL:** It has a “no safe levels” management approach to contamination with hazardous chemicals, seeking to investigate and use the lowest detection limits technically possible.
- **SAFETY NET:** The MRSL addresses both inputs and outputs, setting limits for wastewater prior to treatment, which provide a safety net to assess enforcement in the whole facility, check progress in phasing out hazardous inputs and trigger root cause analysis and remediation if anything is flagged.
- **COMPREHENSIVE LIST:** As a result of its hazard-based and proactive approach, the MRSL not only covers the 11 priority group of hazardous chemicals, but it also lists a further 266 individual substances. Some of the latter are important substances to tackle because of their widespread use in textile production, such as formaldehyde or solvents including toluene and NN-dimethylformamide.
- **CLEAN FACTORY:** To protect against cross-contamination and fully take responsibility, committed companies have endorsed a Clean Factory approach which requires suppliers to apply Detox across their whole mill, not only for the company ordering the products. As CTN members are suppliers themselves and do not have the same level of influence as global brands, The CTN Environment department is committed to “provide the tools for communication and data tracking and assist smaller companies to resolve continued contamination in cases of low contractual leverage”.
- **IMPLEMENTATION:** To date, the Prato-based companies have already removed several hazardous chemical groups required by the Detox campaign, including brominated and chlorinated flame

¹ <https://www.confindustriatoscananord.it/sostenibilita/detox/english-version>

² https://www.confindustriatoscananord.it/media/DETOX/DetoxMRSL_PUBBLICA.pdf

retardants, organotin compounds, and amines associated with azo dyes. More actions are detailed in its operational plan.³ Disclosure of test results is also already happening.⁴

- **CLOSING AND SLOWING THE LOOP:** Prato CTN has also committed⁵ (p7) to tackle the issue of slowing and closing the loop, through developing an ad-hoc “Extended Producer Responsibility” system, that drives changes in product design to improve their recyclability and durability as well as seeking to develop or contribute to take-back programs.
- **NETWORKING AND COORDINATED LEVERAGE:** CTN is fully dedicated to sharing and expanding its plans, research and achievements with other textile stakeholders beyond the borders of Italy. It is aiming to positively influence the reduction of hazardous chemical contamination and faster emergence of alternatives in chemical formulas being placed on the market by chemical suppliers, thereby speeding up the emergence of safer alternatives.

2. ZERO DISCHARGE OF HAZARDOUS CHEMICALS GROUP (ZDHC GROUP)

The so-called ZDHC group (Zero Discharge of Hazardous Chemicals) was created in 2011 as a collective industry response to Greenpeace’s Detox campaign, which inspired six global sportswear and fashion brands to make Detox Commitments, shortly after its launch in July 2011; it currently has twenty one members. The ZDHC group states⁶ “Our mission is to advance towards zero discharge of hazardous chemicals in the textile and footwear supply chain and act to improve the environment and people’s well-being. Our vision is widespread implementation of sustainable chemistry and best practices in the textile and footwear industries to protect consumers, workers and the environment.”

Despite this mission statement and a membership which includes 15 Detox-committed brands out of the 19 assessed in this year’s Detox Catwalk, collectively the ZDHC group still hasn’t endorsed or implemented some of the key principles of Detox that are needed for the fully credible implementation of its 2020 goal to eliminate all hazardous substances.

ZDHC has developed a collective Manufacturing Restricted Substances List (MRSL) (current version v1.1⁷) used in this form by several ZDHC members including 9 brands assessed in the Detox Catwalk, or in an enhanced version (for example, with an addendum of chemicals) by 3 other Detox Catwalk brands (C&A, G-Star, M&S). The ZDHC’s MRSL has several major flaws:

- **WEAK HAZARDS APPROACH:** The ZDHC MRSL is not fully hazard-based, and therefore is not ‘aligned’ to the Detox principles of using a hazard-assessment methodology. Like Detox, the ZDHC MRSL uses GreenScreen tools to identify hazardous chemicals but also applies several of its own risk-based and arbitrary criteria to filter the results, without transparency on the method. Therefore it is likely to exclude many chemicals that are flagged by GreenScreen as requiring substitution.
- **NO RECOGNITION OF NO SAFE LEVELS:** It is also lacking a “no safe level” approach which recognizes the necessity to constantly adopt and seek to improve the lowest achievable detection

³ https://www.confindustriatoscananord.it/media/DETOX/piano_operativo.pdf

⁴ https://www.confindustriatoscananord.it/media/DETOX/Prato_Disclosure_DATA_2016_02_11_public.pdf

⁵ <https://www.confindustriatoscananord.it/media/DETOX/DetoxCommitmentPratoTemplateFINAL.pdf>

⁶ <http://www.roadmaptozero.com/about/>

⁷ http://www.roadmaptozero.com/fileadmin/pdf/MRSL_v1_1.pdf

limits, to ensure that contamination of inputs and releases of hazardous chemicals are reduced as much as possible to zero.

- **NO SAFETY NET:** The ZDHC MRSL focusses only on the inputs - chemical formulations used by manufacturers - and does not set maximum allowed limits for hazardous chemicals in environmental outputs such as untreated wastewater and sludges that result from wastewater treatment. Thus, it misses a critical safety net for monitoring compliance and checking progress in suppliers' mills. ZDHC has announced that a Wastewater Discharge Quality Guideline will be released later this year, although it is not yet known if and how this will inform ZDHC MRSL.
- **LIMITED SCOPE OF CHEMICALS WITHIN THE 11 GROUPS AND NOT MUCH BEYOND:** Only a limited subset of chemicals from the 11 priority groups are subject to a usage ban: for example, in the chlorinated solvents or halogenated flame retardants chemical groups, many individual chemicals are missing and for PFCs, the only chemicals included are PFOS and PFOA, which are already regulated in some places. A few chemicals beyond the 11 groups are listed, mostly dyes, but notably missing are some important substances to tackle because of their widespread usage in textiles, such as formaldehyde or solvents including toluene and N,N-dimethylformamide. In addition, a Research list⁸ has been created by ZDHC but this cannot be considered as a phase-out list as it doesn't set timelines for elimination and therefore doesn't send a strong enough message to stir up change and encourage the emergence of alternatives before the 2020 goal.
- **NO CLEAN FACTORY APPROACH :** The ZDHC MRSL misses an opportunity to exercise leverage on its Members supply chains by not conveying a "Clean Factory" approach which requires a brand's suppliers to apply Detox across their whole mill, not only for the brand's products.

⁸ <http://www.roadmaptozero.com/fileadmin/layout/media/downloads/en/ResearchList.pdf>