

**Written evidence submitted by Lee Klabin-Grant, Founder & Creative Director
of sustainable fashion label 'Lee Klabin Ltd'**

INTRODUCTION

This submission is made necessary due to the Government's rejection of the findings of the 'Fixing Fashion' Report published by the Environmental Audit Committee ("EAC") in February 2019.

Considering the mounting evidence of global damage to both people and planet as a result of the lack of effective regulation in the fashion industry, it is alarming that the original 18 recommendations made in the February 2019 EAC report were, in effect, rejected before being given the chance to be properly debated and acted upon. I am grateful for this second attempt to awaken Parliament to the very real urgency in resolving these issues, which are of international consequence.

I sincerely hope that the more limited areas now being focused on by the EAC will be given the due attention and consideration they deserve by Government. Considering recent government failings in these particular areas which have been widely reported in the national press, both myself and my many colleagues in the sustainable fashion field feel that now there is a last-chance opportunity for genuine, permanent change for good, through the implementation of certain legislative changes. This would help heal some gaping wounds in the structure of Britain's fashion industry and help us to become global leaders in the realm of environmentally and socially responsible conduct. A position which we should embrace, especially as we are about to exit the European Union officially at the end of this year.

COP-26 & Brexit– A unique combination of timing and opportunity...

The UK will be hosting COP 26 next year, following a devastating pandemic that will leave us all in sore need of positive news and, more importantly, positive reform. This will be a unique moment where the prime opportunities of 'Brexit validation' and COP26 merge. This provides our government with the opportunity to demonstrate its capabilities, as well as its upgraded priorities, when it comes to improving the futures of its citizens and the vision of a "global UK". The UK will be striving to show its successful independence from the E.U by thriving as an independent Nation and exceeding the previous standards set by the EU in environmental and worker protections. The U.K effectively has one year until COP 26 to put right a series of very grave wrongs. Amongst them is to fix the fashion industry. This is an industry that currently pumps an estimated GVA of £3.94bn into the treasury. An industry that as of 2 years ago provided 163,000 UK jobs in design and designer fashion. A figure which saw a 60% increase between 2011 & 2018 and is set to continue further.

There were also an estimated 23,400 UK businesses in the fashion industry category in 2017, which increased by almost 3 per cent year on year since.

Yet, despite these impressive figures, the amount of waste the fashion industry produces creates enormous environmental damage and, as the original Fixing Fashion report highlighted, the financial losses under the current models and lack of regulations are costing the UK treasury on average £100-£150 million each year.

I'm sure it will be quite clear to everyone - now is not the time to allow old and detrimental institutions to stand in the way of genuine, healthier progress. We can't afford it, in any sense. Now is the moment to seize the changes already happening, increasingly being pushed for by the public and already being pounced on by the press.

There are a combination of events which are about to give rise to an opportunity we will likely never see again: to make the UK the champion of environmental and social guardianship in the eyes of UK citizens and the wider world. Now is the opportunity to implement the legislation required to re-route this industry towards a healthier, fairer and genuinely good place that the UK can boast of. An industry whose practices are as beautiful as its products.

The fashion industry can be beautiful BECAUSE of its stewardship of our environment. BECAUSE of its leadership in engaging society fairly, transparently and consistently. The fashion industry sets the standards for the values we choose to show of ourselves when we wear its products.

With this awesome power it has the opportunity to truly reflect our aspirations and to help us better direct them. To re-route them to something that will chime much deeper within us. Be more profound than fleeting aesthetics. It can help us all champion the change we want to see in the world, by BECOMING that very change.

What we wear is our choice. It is our message to society. A message of what we want to see more of. What's important or, alternatively, what no longer serves us or our precious planet.

Moreover, the way we choose how our fashion industry works, ripples through every single facet of society. There isn't a single person on the planet who hasn't made a fashion choice of some sort. It's quite literally 'on' all of us.

I see it as our duty, to give people a better choice. Improve those standards. Rise higher in purpose and practice simultaneously.

Fixing the future must start now.

I have responded below to the questions raised in the Inquiry call for evidence, where I felt I could best contribute. Amongst the large group of devoted sustainable, ethical and green businesses already in the fashion industry, I know my colleagues and their varied expertise will address the remaining issues so that collectively, they will all be addressed with solutions to help us move forward.

My business, Lee Klabin Ltd, is a 100% sustainable and ethical one. We proudly produce everything in the UK. Our cashmere wool comes from Scotland and is knitted in London. I am already doing everything I can to ensure that, by minimising my environmental and social impact, I also help our aching UK economy. But it saddens and frustrates me and my colleagues in the fashion industry that the options that could enable more rapid sustainability-focussed growth aren't seeing the kind of justifiable investment and attention from the government. This is the kind of investment that would secure the sustainable future so often boasted about. The kinds of investments that would show where our priorities truly lie. The alternative is clinging onto crumbling, misguided and archaic establishments versus trimming the fat from existing business models that are no longer compatible with our present and certainly not our future.

The time for action is now. It is no time to kick the proverbial can down the road. A failure to act now impacts not only on our children's future but on us all today too. Action needs to be already implemented in a couple years, not decades.

If our current government is concerned with its own legacy, then know this: without putting in place the kinds of legislation required to ensure the fashion industry abides by regulations that will prevent our decline into irreversible climate change and social injustice- failure, will be its only lasting legacy.

SPECIFIC ANSWERS TO CONSULTATION QUESTIONS

- ***The impact the pandemic has had on fashion waste & the waste management of excess stock to date. (Point #2 , #6 and #9 combined) –***

Throughout the pandemic there has been an enormous rise in garments being donated, discarded and attempts to recycle some. Unfortunately, the UK doesn't yet have the sufficient infrastructure necessary to handle disposed-of textiles despite people's good-will when trying to find places that recycle them. As the country that consumes the most new clothing in Europe, we have the added incentive to deal with the aftermath of this overconsumption. Last year's report saw a proposed 1p tax per garment for fashion companies. On the calculations done then with shopping quantities- that would have raised over £30 million per year. £30 million pounds that could have gone towards building more and better recycling centres, not just for textile but for all disposed recyclables. That being said, many in the industry have now indicated that a mere 1p isn't enough and would be happy to pay more in order to achieve more. If there was a 50p tax per garment sold, that would raise over £1.5 billion. That small tax would make a huge and very real difference. It would enable the UK to take a massive step towards the investment of circular business models that would genuinely start cleaning up the mess caused by the industry. A 50p tax on a garment is highly unlikely to dissuade any consumers. It may even make consumers

feel better about their purchasing choices. This presents a PR opportunity for brands, not a handicap.

- ***How could employment law & payment of the minimum wage be more effectively enforced within the fashion industry. (Point #4)***

Here lies one of the timely opportunities mentioned above. It enables the UK to match and then surpass our European neighbours. France has implemented a very welcome and successful Corporate Social Responsibility (“CSR”) scheme for every business. As of 2008, France began special diplomacy on this issue, with a Special Representative for Bioethics and Corporate Social Responsibility (a position currently held by Geneviève Jean-Van Rossum). She is able to draw on France’s strong commitment to CSR at European and international level, and its ground-breaking work in various fields (including non-financial reporting), as well as on the CSR Platform attached to the Prime Minister.

A fundamental objective of national, European and international action should be to secure the highest corporate standards to protect human rights. That is why France adheres to the [United Nations Guiding Principles on Business and Human Rights](#), which were unanimously approved by the United Nations Human Rights Council in its resolution 17/4 of 16 June 2011 on the basis of the report entitled: “Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework” established in 2011 by John Ruggie. With this plan, France commits to implement them, mainly via its ground-breaking corporate social responsibility policy.

There is no valid reason why the UK cannot implement a similar if not better framework. The UK will shine brighter on the global stage if it does.

The “United Nations Guiding Principles on Business and Human Rights” is a universal road map for implementing standards that aim to make businesses accountable in regard to human rights. **Their unanimous adoption and their gradual implementation constituted a major step forward in translating into action the awareness that globalisation comes with a responsibility for all stakeholders, both public and private. For they must take care of the planet and society in which, and from which, they live to ensure that human development is genuinely sustainable.**

This should be the UK’s aim if it wants to come anywhere near the kind of positively impactful nation it wants to be. But we have some serious catching up to do.

- ***What are the pros and cons of proposals to licence factories or more strongly regulate purchasing practices? (point #5)***

This question raises more questions. The Modern Slavery Act became UK law in 2015. But why has the UK government not deemed it important enough to provide the resources to properly enforce? Reports about companies like Boohoo being associated with factories that failed to protect the basic human rights of their workers or paying workers the national minimum wage rightly shocked the nation. Well before the press reported on them, these conditions were widely known about, but no one deemed them important enough to stop, until the press coverage in July 2020. The level of publicity such illegal behaviour gains should not be the basis on which enforcement action is taken. Government should enforce the law already on the statute books. This requires funding to investigate the breaches and to enforce against it, whether by taking civil or, more appropriately, criminal action.

A licensing regime is likely to serve the public interest. If a licence is a pre-requisite to running a manufacturing business, operators are more likely to abide by the requirements or conditions of such a licence as a commercial imperative. However, resources must be in place to investigate breaches of licence conditions or else it risks becoming a dead letter.

Licences could be conditioned to ensure health and safety standards (not least during the COVID pandemic), worker hours and rights, the national minimum wage and environmental targets are met.

Additionally, the introduction of a “fit and proper” test for the holder of the licence may help to ensure that criminal or rogue operators of factories cannot hold such a licence and they will, rightly, be excluded from further participation.

Further there can be “financial conditionality” on the grant, renewal or retention of a licence. If taxes are not paid, licences may be in jeopardy. A similar scheme is likely to be introduced, for example, in taxi licensing ([see here](#)). This will benefit the Treasury.

By continuing to turn a blind eye in the hope that the problems will ‘sort themselves out’, the UK government is risking the health and safety of the employees working in these abhorrent conditions. Reports suggest that COVID infected employees have been pressured into coming into work in factories. This behaviour puts enormous strain on the state which is then obliged to deal with the suffering and poverty that results.

Surely it is better to prevent the problem arising in the first place than simply dealing with it afterwards? A properly enforced licensing regime will greatly assist.

How can any stimulus after the coronavirus crisis be used to promote a more sustainable fashion industry? (Point #7)

The increasing investment in circular businesses and green innovation is not just a trend. It is now recognised as a very real necessity. Fossil fuels are used to make synthetic fibre. This is the highest contributor to the carbon footprint of clothing manufacturing. What is needed is a “circular” redesign of fibre production to exclude damaging fossil-fuel based fibres. Circular redesign means that the waste from manufacturing is used to produce further products and not simply deposited as landfill (i.e. “linear” design).

As the founder of a business striving to model 100% sustainable, circular fashion design and production, I have seen first-hand how limited the options are in every single step of the supply and manufacturing chain. I know how difficult it is to find young companies that have managed to get sufficiently off the ground to make their healthier alternatives available to the fashion industry. Investment in the processing of natural, renewable alternatives is now unanimously agreed upon as the way forward in the sustainable fashion industry. Any further investment into fossil fuel based and linear industries will be seen as drastic neglect by a large and growing part of the population.

Financial institutions know that the future we and our children deserve isn't possible while continuing to rely on fossil fuels. The only real and viable way forward isn't to wait until we've tapped-out the planetary reserves of oil, causing irreparable damage in the process. It is only through a sharp and united re-direction towards circular, clean, and carbon negative practices, that we will see the future we all want.

It is now up to the UK government to be the leaders in the biggest wave of life-affirming innovation in the world. We have plenty to catch up on, but never was there a time when more people are willing to work towards making these positive changes happen.

I hope that this response is helpful, and would be happy to speak on any of the issues below with the Committee if that would be useful.

On the following pages, you will find a list of just a few of the fashion labels in the UK who are already engaging in and utilising the sustainable & ethical business models that our country needs more of.

1. Tom-o- <https://www.tom-o.com>
2. Richard Malone -
3. Dilara Findikoglu

4. Christopher Raeburn
5. Bethany Willians
6. Phoebe English
7. Kitty Ferreira - <http://kittyferreira.co.uk/>
8. Roop. -<https://www.itsrooper.co.uk>
9. Emily Bode <https://www.bodenewyork.com/>
10. Patrick McDowell
11. E.L.V denim <https://elvdenim.com>
12. 1/Off <https://www.1offparis.com/pages/about-us>
13. Maria Bernad <https://lesfleurstudio.com/about/>
14. Duran Lantink <http://www.duranlantink.com>
15. Aimee's Kent <http://aimeekent.com/about-us/>
16. Adam Jones <https://apoc-store.com/collections/adam-jones-women>
17. Diane gaignoux <https://apoc-store.com/collections/diane-gaignoux-women>
18. EELLS <https://eells.co.uk>
19. Congregation design <https://www.congregationdesign.com/e-shop>
20. Phlegm Green <https://www.instagram.com/phlegm.handbags>
21. Liam Hodges <https://liamhodges.co.uk/pages/about>
22. Hurtense -<https://www.hurtence.com/home2>
23. Michelle Lower Holder -<http://www.lowe-holder.com>
24. Martina Spetlova <https://www.martinaspetlova.com>
25. Underage -<https://underagestudio.com/pages/ss20-show>
26. Bav Tailor <https://www.bavtailor.com>
27. Ally Bee -<https://ally-bee.com/>
28. Hanna Stote <https://www.hannahstoteknitwear.com>
29. Vinti Andrews <https://vintiandrews.com>
30. Studio Alch <https://www.a-l-c-h.com/about>
31. E Tautz -<https://etautz.com>
32. Elvis and Kresse - <https://www.elvisandkresse.com/>
33. Triarchy <https://triarchy.com>
34. Martina Cox <https://www.martinacox.com/about>
35. Antiform <http://www.antiformonline.co.uk>
36. Riley Studio <https://riley.studio>
37. Lara Intimates <https://laraintimates.com>
38. AC official <https://www.ac-official.com/collections/all>
39. Re Done -<https://shopredone.com>
40. Marques Almeida <https://www.marquesalmeida.com/>
41. Atelier mimi <https://www.ateliermimii.com>
42. Klements -<https://klements.co.uk>
43. Livia Tang <https://liviatang.co.uk/about>
44. DBBerdan www.dbberdan.com
45. Xenia Telunts <https://xeniatelunts.com/about>
46. Margaret Burton <https://margaretburtoninc.com>
47. Ossom Brand <https://www.osombrand.com>
48. Rave Review -<https://www.rave-review.com/about/>
49. Mud Jeans <https://mudjeans.eu>
50. Valentina Karella <https://valentinakarellas.com/product-category/jumpers/>
51. Mc Padden - www.McPadden.ie
52. Ksenia Schnaider <https://www.kseniaschnaider.com>
53. Mara Hoffman <https://marahoffman.com>

54. Alyx <https://www.alyxstudio.com/>
55. Recycle <https://recyclestore.bigcartel.com/products>
56. Marine Serre <https://marineserre.com>
57. Germanier <https://kevingermanier.com>
58. Rave review <https://www.rave-review.com>
59. Eco Alf <https://ecoalf.com/en/>
60. Ilke and Ernie <https://ilkandernie.com/pages/about-us>
61. Katie Jones <http://www.katiejonesknit.co.uk>
62. Hillary taymour <https://collinastrada.com/pages/about>
63. Stine goya <https://stinegoya.com/pages/sustainability>
64. tretorn <https://eu.tretorn.com>
65. Kitx <https://kitx.com.au/collections/kitx-exclusives>
66. Harem london - <https://www.haremlondon.com/>
67. House of dagmar <https://www.houseofdagmar.com/>
68. House of Sunny - <https://www.houseofsunny.co.uk/sustainable-sector>
69. Jeanerica <https://jeanerica.com/>
70. Richard Quinn - <https://www.richardquinn.london/>
71. STELLA ORGANICS www.stellamccartney.com
72. Vin and Omi - <http://www.vinandomi.com/>
73. Ronald Van der Kemp <https://www.ronaldvanderkemp.com>
74. Julie de libran <https://www.juliedelibran.com/about>
75. Mimi prober <https://www.mimiprober.com>
76. Peter do <https://peterdo.net/pages/ss21>
77. Lindsey Berns <https://www.lindseyberns.com>
78. Thousand fell <https://www.thousandfell.com/pages/our-materials>
79. The Big favourite <https://thebigfavorite.com/pages/tbf-press>
80. ID - <https://id-uk.co.uk/>
81. Kave Footwear <http://www.kavefootwear.com>
82. Black Horse lane atelier <https://blackhorselane.com>
83. solai <https://solai.uk>
84. Rejina pyo <https://rejinapyo.com>
85. Sezane <https://www.sezane.com/en/news/>
86. Sand <https://sandcopenhagen.com>
87. Community clothing <https://sandcopenhagen.com>
88. Ahluwalia
89. Good News
90. People TREE
91. Nanushka
92. Re See
93. Fyodor Golan
94. JP Atelier <https://www.jplatelier.com>
95. Tomenyc <https://tomenyc.com/>
96. Vivienne Westwood <https://www.viviennewestwood.com/en/>
97. Fanfare <https://fanfarelabel.com>
98. Peterson <https://petersonstoop.com/>
99. Calla <https://calla.fr>
100. 100.Zero waste daniel - <https://zerowastedaniel.com>
101. LEE KLABIN LTD. – www.Leeklabin.com