

## Written evidence submitted by Kate Agusté, Founder of mi apparel LTD.

### Introduction

I, Kate Agusté have been working in the fashion industry for over 20 years with the last three being a business owner of mi apparel LTD, a Sustainable Fashion online shop that stocks Ethical Brands from around Europe. Here, I have seen first hand how ethical businesses can research, design, manufacture and sell ethical, sustainable clothing for citizens around the world that don't have a devastating impact on our planet or people within this industry.

### Summary

I welcome the opportunity to submit evidence to the Environmental Audit Committee's inquiry to follow up on a selection of original points from the 2017 Fixing Fashion report; Clothing consumption and sustainability. In summary, I believe that:

- We can see there is a recurring theme of not-for-profit organisations and academia being formed who are passionately leading to create change from within our fashion industry. However, due to lack of government regulation and legalisation we are not seeing much progress to overcome factors such as social justice and textile waste plight we have in the UK alone.
- We need to involve climate Justice and social justice impacts into the metrics of the fashion industry statistics as well as the environmental impacts. People are on the front line of our climate emergency globally.
- The UK should be learning from other industries and countries from around the globe who have proven their own mandatory regulated initiatives in textile waste and Extended Producer Responsibility (EPR) can work and be successful.
- We should make the UK a leading example across the globe to view the issues at hand and how we can bring regulation & legislation to make our fashion industry a better place for our people & planet through our own UK Fashion Pack.
- We aren't going to stop people from producing clothing, nor can we stop them from buying, we can however make sure within the supply chain people are treated fairly, with dignity, working in a safe environment, paid a living wage or more and our planet is not damaged in the process through the production & manufacturing of goods required to make a garment via toxins, chemicals in agriculture, air pollution, water pollution.

### What progress has been made in reducing the environmental and social impact of the fashion industry since the Fixing Fashion report came out?

1. There has been a mixture of organisations coming together to actively raise awareness in reducing the environmental and social impact within the fashion industry since 2019 this includes and not limited to;

- Leading organisation The British Fashion Council launched their Institute of Positive Fashion<sup>i</sup>, a platform a platform designed to celebrate industry best practice and encourage future business decisions to create positive change. Here the focus is through three strategic pillars; Environment, People, Community & Craftsmanship. This initiative came into place after the successful launch of the Positive Fashion category & exhibition at London Fashion Week 2019.
  - A collaboration between global media company Condé Nast and respected fashion institute Centre for Sustainable Fashion, London College of Fashion (CSF), University of Arts London, collaborate with the publication of 'The Sustainable Fashion Glossary'<sup>ii</sup>. This work has brought together a collective dialogue of terms and references throughout common language to strengthen and develop sustainability literacy in fashion media, in order for editors to understanding the new era of fashion
  - In 2018, prior to the submission of the original Fixing Fashion report, 'The Union of Concerned Researchers in Fashion' (UCRF)<sup>iii</sup> was formed by Kate Fletcher, Linda Grose, Timo Rissanen and Mathilda Tham. A manifesto, to which individuals can sign, has been produced from the recognising that the fashion sector or productions and activities contribute to the destruction of earth and humans. The union wants all involved to unite to take action and tackle through leadership, use of scientific and artistic knowledge to disrupt the current way of working within the fashion industry. There are currently 264 signatures who have signed the manifesto from around the globe whom meet monthly and gather annually (AGM).
2. These are all great initiatives to collectively come together in collocation of findings, new working practices and speaking the same dialogue. However, it does not measure any sort of impact across environment or social matters within the fashion industry.
  3. The recent SCAP report from WRAP<sup>iv</sup> indicates between 2012-2019, that though there has been significant progress in reducing carbon and water with textile waste<sup>v</sup> still being a key issue to be tackled. However, no discussion on social justice within the Fashion Industry.

### **What impact has the pandemic had on fashion waste?**

4. Due to the COVID-19 pandemic, closure of stores and a shift in consumer purchasing globally, we have actively seen fashion retailers cancel orders with their manufacturing suppliers. These goods have either been shipped already or fabric has been purchased ready to be produced by garment factory workers.
5. In an era where new collections are landing bi-weekly, the consumption of waste has been growing. Therefore the cancellation has seen an excess of garments which have already been produced are now left on factory shop floors.
6. A 20 minute documentary was released by the BBC<sup>vi</sup>, showcasing one person's plight owning a denim manufacturing business in Bangladesh and the impact COVID-19 has had on his business due to closing restricts to cancelled orders and an insight to the garments left in the factory to what had happened to garment workers when they were laid off.
7. Unsold goods have racked up in stores which have been forced to close, which has seen an increase in price slashing, therefore contributing to a throw away culture due to the garment being discounted to a next to nothing price.
8. According to a new survey by the Waste and Resources Action Programme (WRAP)<sup>vii</sup>, there was an uprise in decluttering at home during the pandemic and lockdown measures where in place 184 million textile items have been cleared out of households. 57 percent of

this figure were still waiting at home until COVID-19 lockdowns lift and they can be safely disposed of due to the closure of charity shops and recycling centres across the UK.

9. We have also witnessed the disposal of thousands of H&M labels being dumped at a Nature Reserve in Sri Lanka<sup>viii</sup>. This just adds to the ever increase of fashion waste not being correctly disposed of and in this instance burying was chosen over incineration.
10. We equally need to take note how the COVID-19 Pandemic has effected the textile recycling scheme, globally. As noted in the article by Reuters<sup>ix</sup>, Exporters are struggling, as are traders and customers in often poorer nations from Africa to Eastern Europe and Latin America who rely on a steady supply of used clothes. Prices have been slashed in order to move the mountains of clothes that are building up in warehouses across the world.

### What impact has the pandemic had on the relationship between fashion retailers and suppliers?

11. In my personal opinion, The COVID-19 global pandemic has shown the true colours of fashion business models and moral values within the fashion supply chain in regards to relationships between retailers and suppliers. It has quite rightly made public how the industry is unregulated, with appalling unethical business practices in place and shown how people are making money out of other peoples misery.
12. The pandemic has shed a light on how suppliers are not legally connected to any fashion house business, unless they are directly on the payroll and/or the manufacturing factory is owned by said fashion business.
13. The biggest campaign to date which has been met with global support. #PAYUP founded by Remake<sup>x</sup>. They launched a petition demanding brands to #PayUp as a response to reports coming in from suppliers that brands had cancelled in-production orders as a result of retail constriction following the outbreak of coronavirus. The accrued over 270,000+ signatures and has become a worldwide movement. From this they have now launched a new long-term vision for change, aiming for centre worker voices and demands in the future of fashion. The campaign demands that retailers and brands make public commitments and transparently report on the 7 actions annually<sup>xi</sup>. This is pressure from activism and is voluntary only.
14. Elizabeth L Cline, investigative journalist, author and activist in fashion, hosted a WEAR event. Here we heard from a panel discussion about putting people first in fashion's supply chains<sup>xii</sup>, the following are direct quotes;
  - **'Brands have a huge safety net - access to credit, teams of lawyers, deep financial pockets. Suppliers have no safety net'** - Elizabeth L.Cline outlining the power of imbalance in fashion supply chains.
  - **'For too long the West has controlled the dialogue whilst profiting from labour in the global South. There's a power imbalance. We need to put more workers and producers at the heart of the conversation'** - Ayesha Barenblat speaking about creating a worker-driven fashion industry.
  - **'When you support a brand that isn't ethical and isn't paying their suppliers, you're having a direct impact on people's lives.'** - Mostafiz Uddin speaking about the response he got from buyers who refused to #PayUp during Covid 19 and the impact on his livelihood and workers. The need from these remaining brands to #PayUp is as strong as ever. They've protected their cash reserves over the lives and livelihoods of their suppliers.
15. During the global pandemic period, we have seen the power of social media and as to quote from The British Research Company<sup>xiii</sup>;

- *'Social Media is playing a pivotal role in educating people about sustainable fashion. Social media is emerging as an indispensable tool to share brand stories, create communities, and sell/purchase fashion products. As they perform these activities, several fashion creators are using these platforms to raise awareness on ethical issues in fashion and even promote fundraiser campaigns to support the ethical fashion industry. Fashion bloggers are increasingly focusing on sustainable fashion. In response to such activism and education, in 2019, internet searches for 'sustainable fashion' increased by more than three times compared to 2016, and this trend is expected to continue in the forecast period.'*

### **How can any stimulus after the Coronavirus crisis be used to promote a more sustainable fashion industry?**

16. Sustainable Fashion and Fashion need to begin to bridge together to become one in order create real change. We need to stop referring to sustainable fashion as it's own entity. We need to standardise the model. Suggestions are as follows and not limited to;
  17. A report has been compiled by The Apparel Coalition<sup>xiv</sup>, highlighting key areas to what has happen within our fashion industry during COVID-19 and how we can look to rebuilding a more sustainable fashion model once we move out of the worldwide pandemic. Here it picks up on key factors which can be implemented for change via practical and action guidance such as;
    - Protecting creatural assets to service the economic crisis
    - Solve immediate inventory channelise in partnership with suppliers
    - Integrate sustainability throughout business recovery strategies
    - Accelerate transparency while increasing sustainability ambitions
  18. In the UK, we need to open to the possibilities to what other industries have in place and transfer those practices into the fashion industry. For example; Climate Action 100+<sup>xv</sup> within the Finance sector. We should set our own initiation in place with a UK Fashion Pack, like that of the G7 Fashion Pack<sup>xvi</sup>; being a coalition of recognisable UK leaders within the Fashion industry coming together to collectively lead the bridge between sustainable fashion and fashion to make it become one through their respected influence, power, leadership and knowledge.
  19. Idealistically the UK Fashion Pack would compromise of;
    - British Fashion Council (Organisation)
    - Vogue UK (Media)<sup>xvii</sup>
    - Centre for Sustainable Fashion (Education)
    - UK Government (Political)
    - The Sustainable Markets (Initiative)<sup>xviii</sup>
  20. We need actability, metrics, practical outcomes which are achievable. Turn these into common goals and share round the globe for change. We need a diverse group for the UK Fashion Pack to be pulled together in order create this change and start leading from the front.
  21. It is not enough to focus on just statistics, we need to build a human connection to our problem, climate & social justice needs to be addressed and tackled. We need to stop making the re-bilitation towards sustainable practices about not just offsetting our carbon footprint, we need to talk about people.

22. Currently Fashion Act Now an organisation who are actively campaigning for fashion to reduce its impact on climate and ecological breakdown. Wanting to create a road map of pledges to hold businesses accountable for their practices.<sup>xix</sup>
23. We need to look into a possible enforcement of a de-growth strategy for incentivising fast fashion brands to move away from their current model of 12-24 collections a year.

**How could employment law and payment of the minimum wage be more effectively enforced within the UK fashion industry?**

24. Why is the government not collectively working with the Living Wage foundation<sup>xx</sup>? An organisation where it has based a cost of the true living wage in the UK. Why is this a voluntary scheme and not a statutory legal requirement?
25. Surely if consumers were paying a true cost for a product, a living wage has been implemented within businesses, then not only will frivolous consumption and waste rates will also go down, then the UK will be on a level playing field economically.
26. Here from a report produced by Labour behind the Labour<sup>xxi</sup> where they investigated into living wage commitments in M&S and H&M supply chain, showcasing how their greenwashing marketing lives up to the reality to the workers who produce their clothing not being paid correctly and living in dire poverty.
27. This year UK Fashion giant Boohoo came under investigation with one of their UK suppliers in Leicester. Here, audit reports show how they failed to prove they pay at least the legal minimum wage to their workers<sup>xxii</sup> showcasing they were underpaid and working in unacceptable conditions.
28. The government needs to enforce labour laws in the fashion supply chains due to the exploitation within the UK garment factories.<sup>xxiii</sup> We have seen over the years how certain acts, such as the Modern Slavery Act 2015 is not monitored and yet again voluntary schemes do not work.

**Is the Sustainable Clothing Action Plan adequate to address the environmental impact of the UK fashion industry? How ambitious should its targets be in its next phase?**

29. The Sustainable Clothing Action Plan (SCAP) is welcomed for the UK to have a benchmark for the Fashion Industry's Environmental Impact, however, what are the impact against social justice?

**What actions could Government take to improve the collection of fashion waste?**

30. The original 2019 Fixing Fashion Report showed that the UK consumers purchase more new clothes annually than any other European country, and send roughly 300,000 tons of clothes a year to landfills and incinerators.
31. 18 months later, we do not have anything in place for textile waste collections, only retailers who have taken it upon themselves to implement schemes within their stores encouraging shoppers to bring unwanted textiles to their stores, only a small proportion of these clothes are sold in international markets. These are not regulated or monitored;
  - The clothes collected by H&M are processed by I:CO, a unit of German textile recycling company Soex

- Zara has laid out its scheme by donating unwanted clothes to non-profit partners such as Red Cross and Oxfam<sup>xxiv</sup>.
32. Given that 73% of clothing ends up in landfills and less than 1% is recycled into new clothing, there are significant costs with regard to not only irreplaceable resources but also the economy via landfilling clothing. The problem of textile waste is becoming bigger by the day.
33. At present, it is estimated that £140 million worth of clothing is sent to landfills in the UK each year<sup>xxv</sup>. Although a significant proportion of recycled fibres are downgraded into insulation materials, industrial wipes, and stuffing, they still constitute only 12% of total discarded material. The problem of textile waste, it's becoming bigger by the day.
34. Britons are buying more clothing than ever but hanging onto them half as long, overwhelming existing routes of textile removal in serious need of significant investments and scalable innovations in order to keep up with the rapid increase of textile waste.

### **What actions could the Government take to incentivise the use of recycled or reused fibres and materials in the UK fashion industry?**

35. I believe the UK government can take note from other schemes and taking to those within the waste industry from around the globe. A few suggestions and not limited to;
- In New York, they have a not-for-profit incentive called Materials for the Arts<sup>xxvi</sup>. Here they collect materials, keep them out of the landfill and give them to thousands of nonprofit organisations and public schools for Creative Reuse projects.
  - Fabscrap<sup>xxvii</sup>, a non-profit organisation dedicated to recycling and reusing textiles that are unsuitable for donation
  - The Materials Recycling World<sup>xxviii</sup> is a place of resource to gain more insight into the UK waste sector.
  - San Francisco are already leading the way since 2002 to a net zero waste initiative by 2020. They have now introduced the Zero Waste Textile Initiative to Keep Apparel, Footwear, Linens Out of the Landfill<sup>xxix</sup>.
36. With just 12% of the material used for clothing ends up being recycled globally, we need to band together to manage and transform waste streams to make processes mandatory throughout the UK from textile producers to personal consumer textile waste.

### **How could an Extended Producer Responsibility scheme for textiles be designed to incentive improvements in the sustainability of garments on sale in the UK?**

37. In 2019, the government of France announced its decision to make Paris the sustainable fashion capital of the world by 2024. The government launched a 'Paris Good Fashion' initiative which is expected to bring designers and experts together to help make the fashion industry greener. In February 2020, the government of France passed a regulation which requires clothing companies in the country to follow around 100 sustainability provisions, including a prohibition on the destruction of unsold goods. The ethical clothing market is thus supported by government initiatives worldwide, which will make a large impression on the industry.
38. Extended producer responsibility (EPR) is a policy measure that provides a means to incorporate the costs of end-of-life management into the price of products.
39. EPR is already in place for packaging and electronics across Europe, and in some parts of North America, most notably Canada. It could also be used to amplify more sustainable

practices and models in the textiles industry and ensure that the whole supply chain is working for the same end goals. Furthermore, if the fees paid by producers are varied so that those whose products contribute more to the problem pay more, or if other fiscal incentives can be used to reflect the environmental damage caused by production of short-life garments (e.g. based on factors such as microfibre release, or the CO2 intensity of production), then EPR could help turn the tide.

40. France has had EPR in place for clothing since 2007<sup>xxx</sup>. It covers 95% of the textiles sector and is a primary example of how effective it can be. The benefits of EPR can include:
- **End-of-life factors considered during design:** Making producers responsible for the costs of managing their products at the end-of-life, they have an interest in anticipating and reducing these costs. Combined with targets for garment reuse and recycling, the result is a change in the incentives around the design and production of garments.
  - **Waste prevention:** EPR need not be limited to garments sold, but could be extended to over-produced items that never reach the consumer – thereby incentivising waste prevention through better stock control.
  - **Investment in reuse:** EPR has the ability to build a stronger, more transparent reuse sector, where organisations such as Salvation Army and Goodwill are recognised and rewarded for the role they play in preventing clothes from going to waste.
  - **Effective collection and processing:** More widespread collection programmes, whether at the kerbside or via producer take-back, will be required to ensure producers can meet reuse and recycling targets. There will also be an incentive to invest in and improve recycling infrastructure, and to make more use of recycled fibres.
41. As well as extending the lives of clothes and mitigating their end of life impacts, EPR could also be used to incentivise lower production or in-use impacts
42. Real term gains will come from circular business models. The life cycle of the garment starting from the initial design concept asking, where is this going to end up. The Ellen MacArthur Foundation has shown in a recent research study how policymakers can help towards a circular initiative<sup>xxxi</sup> by supporting a clothing collection, sorting, and recycling infrastructure.
43. There is currently no structure or form of certifications or targets in place for companies meet certain green targets within their Corporate social responsibility strategies. Is this something we need to look into as a legal requirement?

November 2020

## FOOTNOTES

---

- i <https://www.britishfashioncouncil.co.uk/Institute-of-Positive-Fashion>
- ii <https://www.condenast.com/glossary>
- iii <https://concernedresearchers.org/>
- iv <https://www.wrap.org.uk/content/scap-2012-2019-progress-report>
- v <https://sourcingjournal.com/topics/sustainability/scap-2020-uk-retail-waste-sustainability-187552/>
- vi <https://www.bbc.co.uk/iplayer/episode/m000p5jx/our-world-bangladesh-the-end-of-fast-fashion>
- vii <https://wrap.org.uk/content/citizens-and-clothing-behaviours-during-lockdown>
- viii <https://thegenesistimes.com/thousands-of-hm-labels-found-in-wetahirakanda-nature-reserve/>
- ix <https://www.reuters.com/article/us-health-coronavirus-textiles-recycling-idUSKBN26L0QQ>
- x <https://remake.world/>
- xi <https://payupfashion.com/>
- xii <https://wear.fashiontakesaction.com/sessions/putting-people-first-in-fashions-supply-chains/>
- xiii <https://www.globenewswire.com/news-release/2020/10/28/2116073/0/en/Sustainable-Fashion-Market-Analysis-Shows-The-Market-Progress-In-Attempt-To-Decrease-Pollution-In-The-Global-Ethical-fashion-Market-2020.html>
- xiv <https://apparelcoalition.org/wp-content/uploads/2020/04/Weaving-a-Better-Future-Covid-19-BCG-SAC-Higg-Co-Report.pdf>
- xv <http://www.climateaction100.org/>
- xvi <https://thefashionpact.org/?lang=en>
- xvii <https://www.vogue.co.uk/>
- xviii <https://www.sustainable-markets.org/>
- xix <https://www.fashionactnow.org/>
- xx <https://www.livingwage.org.uk/>
- xxi <http://labourbehindthelabel.org/wp-content/uploads/2016/02/DoWeBuyIt-spreadssml.pdf>
- xxii [https://amp.theguardian.com/business/2020/aug/28/revealed-auditors-raised-minimum-wage-red-flags-at-boohoo-factories?\\_twitter\\_impression=true](https://amp.theguardian.com/business/2020/aug/28/revealed-auditors-raised-minimum-wage-red-flags-at-boohoo-factories?_twitter_impression=true)
- xxiii <https://commonslibrary.parliament.uk/worker-exploitation-in-uk-clothing-supply-chains/>
- xxiv <https://www.inditex.com/our-commitment-to-the-environment/closing-the-loop/collect-reuse-recycle>
- xxv [https://www.wrap.org.uk/sites/files/wrap/valuing-our-clothes-the-cost-of-uk-fashion\\_WRAP.pdf](https://www.wrap.org.uk/sites/files/wrap/valuing-our-clothes-the-cost-of-uk-fashion_WRAP.pdf)
- xxvi <https://www1.nyc.gov/content/mfta/pages/>
- xxvii <https://fabscrap.org/>
- xxviii <https://www.mrw.co.uk/>
- xxix <https://sfenvironment.org/textiles>
- xxx [https://www.wrap.org.uk/sites/files/wrap/UK\\_Textiles\\_EPR.pdf](https://www.wrap.org.uk/sites/files/wrap/UK_Textiles_EPR.pdf)
- xxxi <https://www.ellenmacarthurfoundation.org/our-work/activities/covid-19/fashion>