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Questions and Answers on DETOX

Our experts have answered the most frequently asked questions. Would you like to know more about DETOX? Contact us!

0. WHAT IS THE "DETOX" CAMPAIGN"?

The DETOX (i.e. detoxification) campaign was initiated by Greenpeace (an NGO, Non-Governmental Organization), targeting the elimination of hazardous substance usage within textile and leather industry supply chains.
Following the DETOX campaign launch in 2011, Greenpeace announced that global clothing brands and their suppliers are directly responsible for toxic water pollution around the world, while uninformed consumers have become their accomplices.

1. WHY IS IT IMPORTANT TO DETOX THE APPAREL & FOOTWEAR SUPPLY CHAIN?

The apparel & footwear industry occupies a unique position: its products are consumed by almost everyone on the planet, either out of necessity or a desire to make a style statement.
It has been a driver of economic prosperity in many developing countries where products are manufactured and/or assembled, and has empowered women by providing employment.
At the same time, a lack of responsible behavior at various points along the supply chain has exposed workers, consumers and economies to adverse social and environmental effects. The issue has received increased attention among consumers as scientific data and the diligence of NGOs has combined with the speed and efficacy of the digital information economy. While the industry has been actively involved at least since the 1990s in continuously assessing and mitigating its negative impact, DETOX presents a HUGE opportunity to secure commitments from industry stakeholders and to collectively engage with suppliers, chemical manufacturers, and industry associations in fast tracking elimination of hazardous chemicals from the apparel & footwear supply chain. After all, this is just the beginning of Extended Producer Responsibility (EPR) where the focus is not just on product compliance, but also on process compliance.

2. HOW ARE SUPPLY CHAIN STAKEHOLDERS ENGAGING TO ACHIEVE THE DETOX TARGETS FOR 2020 AND SIMILAR GOALS SET BY INDUSTRY PROGRAMS?

Efforts have been underway for over two decades via industry associations and groups such as AFIRM, AAfa, OIA CMWG, etc. whereby brands, scientific advisors and testing laboratories collaborate on decisions regarding Restricted Substance Lists (RSLs) and monitoring their elimination in finished products. With the Zero Discharge of Hazardous Chemicals (ZDHC) program, the focus also includes activities further upstream at factories, dyeing mills, tanneries, and chemical manufacturers. In China, the National Textile and Apparel Council (CNTAC) has been promoting implementation of ZDHC's tools among its members in China.

Many industry stakeholders have been collaborating in implementing capacity building measures under the umbrella of ‚Cleaner Production'. This was spearheaded by the likes of giz, ILO SCORE, FIT5, etc. From our perspective, ZDHC's standards and tools are seen as the basic minimum, with many brands aiming for higher, stricter goals.

Since early 2017, ZDHC's two-day training module has been aimed at introducing chemical management to agents, factories, dyeing mills and tanneries within the industry. Chemical manufacturers and wet processing factories could rely on ZDHC's Manufacturing Restricted Substance List (MRSL) when using textile chemicals. ZDHC's audit approach is being harmonized with the Sustainable Apparel Coalition's (SAC) Factory Environmental Module (FEM) Checklist in order to have a harmonized auditing approach and reduce audit fatigue at factories. Finally, ZDHC's Waste Water Guidelines could be utilized to verify and validate if clean input and controlled processes result in elimination of hazardous chemicals.

3. HOW ARE THE DETOX MRSL AND AUDIT STANDARDS DIFFERENT FROM EXISTING RSL OR AUDIT PROGRAMS?

Traditionally, the industry has relied on RSL which are lists of substances along with limits/thresholds validated via testing on finished products. With ZDHC's approach, where the focus is also on the process, MRSL have been released, which are to be used to validate process chemicals (dye stuff, tanning agents, washing agents, etc.). The limits in MRSL are higher because of dilution that could take place during the process. Nevertheless, simply ensuring MRSL compliant chemicals conform to standards at the input may not necessarily lead to clean outputs, since factors such as production process, reactions and contamination also affect the output. Hence verification and validation require analysis of both, emissions like waste water, and finished products like fabric, apparel and footwear.

With regard to audit standards related to chemical management processes, the focus is on traceability, chemical management process, hazardous substance identification, usage of Safety Data Sheets (SDS) Technical Data Sheets (TDS), and control measures within the process.

These audits are executed by an auditor with extensive chemical expertise who reviews the chemical management process and tools, SDS documents and validates the control measures being implemented by the chemical management system at the factory. Additionally, as with the Business Social Compliance Initiative (BSCI) and Fair Factories Clearinghouse (FFC), the industry is trying to harmonize and establish a common audit standard in order to reduce duplicate audits at the same factory by different brands. This is being targeted via the SAC and BEPI.

4. HOW DO TÜV RHEINLAND SERVICES ENABLE THE VARIOUS SUPPLY CHAIN STAKEHOLDERS TO REACH THEIR GOALS?

It starts with an internal thread connecting our training capabilities with factory assessment and testing. Next, we contribute within the technical working groups of industry associations and scientific committees to share technical views on standardization.

With regard to the supply chain, we provide awareness sessions for the executives and quality, compliance and procurement teams of brands and retailers. This is followed up with two-day workshops on "Sound Management of Chemicals" for agents, suppliers and wet processing factories. Input chemicals at factories are validated against MRSL via analysis and testing; processes are assessed as per a chemical management audit protocol, waste water is analyzed, and finally products are tested as required. The outcome of these analyses feeds into targeted audits and trainings to support factories with root cause analyses. Some of the organizations combine this with broader goals of water efficiency, reduced waste to landfill, etc. Later this year, compliance with these criteria will result in a DETOXCONTROL certificate which will have a 3-level system.

5. FROM THE PERSPECTIVE OF BRANDS AND SUPPLIERS, WHAT COMES NEXT AFTER DETOX 2020?

As awareness about the toxicity of substances increases, it's certain that there will be new targets for reducing the environmental and social impact on workers and consumers.

While chemical/substance restrictions are in a constant state of change, policy makers and consumer advocacy groups have already initiated dialogue about EPR, and potential issues arising from microplastics from apparel are being reviewed, as is recyclability, usage of natural rubber from sustainable sources, and leather sustainability. DETOX 2020 is just the beginning!

OUR EXPERTS WILL BE HAPPY TO ASSIST YOU WITH ANY FURTHER QUESTIONS. PLEASE CONTACT US!

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