

# CLEANING UP FASHION



## REPORT

JULY 2021



ALL-PARTY PARLIAMENTARY GROUP FOR ETHICS AND SUSTAINABILITY IN FASHION

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ALL PARTY PARLIAMENTARY GROUP  
**Ethics and Sustainability in Fashion**



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# FOREWORD

We are pleased to present the All-Party Parliamentary Group (APPG) for Ethics and Sustainability in Fashion's Cleaning Up Fashion report. This was made possible thanks to the helpful contributions of a range of industry stakeholders: from manufacturers, CSO representatives, small and larger brand and business owners and academics through research and evidence sessions, alongside over 110 respondents to our Cleaning Up Fashion survey.

We are incredibly grateful for everyone's input, which has allowed us to understand both global and local experiences in the industry, the effects of the pandemic, and the sustainable solutions which we believe would support the government's levelling up agenda, the Green Action Plan and commitment to net zero, with stronger legislation to address worker exploitation and environmental impacts across supply chains.

In light of the global pandemic and the evidence we have heard: from non-payment of Bangladeshi factory workers, the Uyghur crisis with its implications on cotton manufacture and closer to home the Leicester scandal with its impacts on our fast fashion sector, this report outlines the escalating concerns and issues impacting the supply chain. The report also highlights the unsustainable consequences of the overproduction of garments and outlines the opportunities for a just transition towards a future wellbeing economy. This would support businesses to be more sustainable, workers to be paid fairly for their labour and scope the possibilities for innovation to support greater circularity of finite resources. In the lead up to COP26 we believe this was never more important or timely.

**Catherine West MP and Baroness Lola Young of Hornsey.**

*Co-chairs of the All-Party Parliamentary Group for Ethics and Sustainability in Fashion.*

# EXECUTIVE SUMMARY

## UK fashion businesses play a key role in local and global industries. The implications of decisions made in the UK by buyers, designers, retailers, manufacturers and citizens are local and global in scale.

This report draws on an evidence base collated through the work of the All-Party Parliamentary Group for Ethics and Sustainability in Fashion (ESF APPG). The report evidences how the UK can play a vital role in the national and global transition towards Net Zero emissions and national and international climate and social justice commitments. Although some of the areas outlined in this report have been highlighted in previous papers and initiatives, progress towards addressing fashion's negative impacts on the environment is critically lacking.

The necessity of these recommendations cannot be stressed enough. The sector offers the potential to make a distinctive and significant contribution to key government post-covid ambitions to level up and create a skilled workforce demonstrating resourcefulness and ingenuity. The fashion industry is the largest of the creative industries worth over £35bn<sup>1</sup> to the UK economy, growing 11% year on year<sup>2</sup>, pre-pandemic. Consumer demand has shifted during the pandemic: from an increase in sales to online retailers, to also requiring greater transparency on pricing and an increased

interest in sustainable shopping options. This backdrop not only highlights the issues facing the sector, but also creates business opportunities for the sector to build back better, with a revised business model, where increased sustainability and transparency across their supply chain. From the ethical impacts facing garment workers in Leicester<sup>3</sup> paid £3.50 an hour, to the environmental impacts from using 1,800 gallons of water to make a single pair of jeans<sup>4</sup>, this ethical and environmental impact information is now more readily available to the consumer than ever. They are seeking government policies and legislation which addresses these issues, aligns with their growing understanding of the impacts and seeks clarity on sustainable solutions, while also offering opportunities for business transformation.

This report examines how government and other supportive actors can help amplify sustainability in action, recognising and supporting the work of pioneers and putting an end to exploitation and environmental harm. This report offers clear, evidence-based recommendations that deal with the causes and symptoms of a sector with massive market responsibility, that clothes us all and is global in its economic, environmental and social significance.

The ESF APPG received over 110 submissions to this inquiry, ranging from industry leaders to consumers, through an industry survey and written evidence. It also heard oral evidence from: Basic Premier, Labour Behind the Label, Anti-Slavery International, University of Leeds, Demin Expert Ltd, Traidcraft, King's College London, University of Leicester,

Corporate Justice Coalition (previously CORE), the UK Anti-Slavery Commissioner Dame Sara Thornton, First Mile, The Ethical Fashion Initiative, University of Manchester, Dublin City University, Awaj Foundation, Human Trafficking Foundation, Centre for Social Justice, ASOS, TRAIID, University of Nottingham's Rights Lab, HURR Collective, Birdsong, Fashion Enter, Compare Ethics, Make It British, Protection Approaches, Uyghur Human Rights Project, IndustriALL Global Union, Worker Rights Consortium, World Uyghur Congress as well as several academics and experts. This report makes specific and direct reference to research carried out to investigate the aims, values and working practices of fashion micro and small (MSE) businesses embedding sustainability within their enterprises. We engage on a regular basis with governmental departments, including the Department for Business, Energy and Industrial Strategy (BEIS), the Department for Environment, Food and Rural Affairs (DEFRA) and the Home Office on sustainability, business opportunities and labour exploitation in the fashion industry.

Our research has taken a largely UK-focus, as well as across the industry's global supply chain, including Bangladesh and China. Currently, the UK is not a large-scale manufacturer of the zips, cotton thread, buttons or the raw materials that make up the clothes we wear. Inevitably therefore, the supply chains for the majority of fashion manufacturing, even those made by the growing number of sustainably minded Made in the UK fashion brands, have to import key components. While UK manufacturing has increased

again in the last decade, since its hey-day in the 1970's, the majority of fashion brands do not manufacture in the UK, even if they are supplying retailers in the UK market. This paper outlines the long-term opportunities for onshoring, while outlining our responsibilities towards our global trading partners across fashion's sometimes complex international supply chains.

We have sought out opinion on how UK policy can positively impact the fashion industry abroad. In our final evidence session, we heard from several experts on the forced labour of Uyghur Muslims in Xinjiang and discussed recommendations as to what the international community, the UK government and fashion brands can do to expedite change in the global fashion and textiles industries.

This report aims to outline the complex current issues, both environmental and ethical, facing the global supply chain on a national and international level, looking both at UK based micro brands (MSEs) and larger internationally renowned brands. The report explores long term sustainable solutions, with key recommendations for both policy makers and business leaders. These recommendations, if actioned, would not only mitigate against the potential suffering of garment workers at the bottom of the supply chain everywhere from Leicester to Xingang; they would also address the escalating impacts of the fashion industry on the environment's finite resources, as a consequence of consumer choices based on an unsustainable and untransparent fashion business model.

# RECOMMENDATIONS

## 1 COLLECTIVE ACTION FOR NET ZERO EMISSIONS

Climate change imperatives, laid out in UK and Global commitments require system wide change across the fashion sector, a significant sector due to its current and predicted impacts and its potential for rapid and radical change. This requires a joined-up approach to create the systemic change needed to achieve a decarbonised economy. For key industries, such as fashion, a sectoral thread is needed, joining up actions across governmental departments including Department for Digital, Culture, Sport and Media (DCMS), BEIS, DEFRA, the Cabinet Office, The Foreign and Commonwealth Office (FCO), Department for Education (DfE) and others. This joined up approach within government can be aligned to alliances and coalitions in industry, to achieve a more streamlined approach, with a more coherent sectoral policy strategy and outcomes.

## 2 RESOURCEFULNESS FOR WASTE ELIMINATION

To drastically reduce the negative environmental and social impact of fashion, there must be a reduction in material throughput. There is a need to focus on significantly reducing the waste problem at source, rather than only at the end of line, where current focus and funding is placed. The extended producer responsibility plans and wider waste strategy should be extended to support resourceful practices and cultures of valuing products and materials.

## 3 EXPEDITE MODERN SLAVERY ACT LEGISLATIVE CHANGES & INTRODUCE A GARMENT ADJUDICATOR

Whilst the government has committed to a broad array of changes to the Modern Slavery Act, we urge the government to expedite legislative changes. It is currently committed to introducing changes "when parliamentary time allows". On top of the promised changes, a "failure to prevent" law that imposes legal liability on businesses which fail to prevent human rights and environmental exploitation from occurring throughout their supply chains should be introduced. And there is an opportunity for a UK wide garment adjudicator and legislation to ensure that certification systems and a verified supplier base are in place for factories in order to create higher levels of trust in the UK fashion sector. The UK government needs to agree and then implement a formal policy on preventing genocide, or combatting identity-based violence and widespread discrimination abroad, to then use this legislation to approach trading partners when and where these issues arise.

## 4 INCREASE IN BUSINESS RESPONSIBILITY FOR APPAREL SUPPLY CHAINS

Apparel companies must carry responsibility for workers in their global supply chains and ensure that:

- Workers' income is sustained throughout the pandemic and beyond, suppliers are paid in full for orders placed pre-pandemic that remain unpaid.
- This system is then enforced post-pandemic.

- All legally mandated severance pay must be paid in full.
- An end to irresponsible sourcing practices.
- Workers within their supply chains are paid a living wage.

## 5 SUPPORT FOR UK MANUFACTURING AND SKILLS DEVELOPMENT

A trusted UK fashion system is required for the UK to be a destination for fashion product design, manufacturing, services and sales. Customers, buyers and designers need clarity around good practice to make informed decisions around purchasing of materials, products and services. As part of the government's plan for levelling up, support for good jobs and the skills required in a decarbonised economy, post-covid, are essential. The fashion sector offers the potential for a range of employment opportunities in the post-covid recovery period, if and when education and skills development is attuned to suit learner needs at different life stages. There is a real opportunity for sustainable, well paid and meaningful work within the sector across the UK's four nations, if a coherent policy approach is coordinated, where education is aligned with business needs and regional development. This report recommends:

- 1) A review of the EBACC, with a revised commitment to STEAM rather than STEM education.
- 2) R&D to support skills development from the T Levels into the workforce.

## 6 INCENTIVISE TAX AND FUNDING TO SUPPORT ONSHORE OF FASHION MANUFACTURING

With many shops empty on our high streets, this report recommends rent controls and subsidised high street space for social enterprises and community groups.

- Tax incentives for B Corps and companies with proven positive social and environmental contributions.
- VAT decrease for stringent observation of human rights impact and due diligence.
- NIC breaks for employing people facing barriers to work at living wages.
- Funding to support sustainable fashion manufacturing in areas of deprivation, to boost local economies across the four nations of the UK.

## 7 MEASURES OF SUCCESS FOR A JUST TRANSITION AND WELLBEING ECONOMY

New models for business that recognise prosperity in social, economic and environmental terms are in evidence, however there are no metrics that recognise this broader measure of prosperity. The just transition to a wellbeing economy involves introducing holistic measures of business success beyond being based solely on economic indicators. The UK Clean Growth Strategy estimated that the low-carbon sector of the economy will grow by 11% between 2015 and 2030, four times faster than the overall economy, and will amount to £60-170 billion in exports. It makes business sense for the government to utilise metrics that go beyond economics.

# CONTEXT SETTING

**This report for the All-Party Parliamentary Group on Ethics and Sustainability in Fashion (ESF APPG) outlines ways in which the fashion sector can contribute to the UK government's social and environmental ambitions. It highlights the intervention points needed by the UK government in order to realise this contribution to the UK in social, cultural, ecological, and economic prosperity terms.**

The majority of current fashion practices, from education to manufacturing, are dominated by a 'fast fashion' business model and 'just-in-time' production to provide near-weekly fashion seasons. These are destroying vital elements of the earth's finite resources. This race to the bottom has led to worker exploitation and low wages at one end of the supply chain, brands escalating production to try to keep in profit with ever increasing retail "drops" to entice the consumer to buy more and seismic waste and environmental degradation at all levels.

The fashion industry does not have to remain rooted in this flawed business model. It is a creatively rewarding sector, one which is filled with innovative approaches. These have the potential to contribute positively to lives and livelihoods across the UK and in our working partnerships across our global supply chains. The UK are global leaders in fashion tech R&D. All the key players in the online retail market, such as YNAP, Farfetch, ASOS, M&S and matches-fashion.com are headquartered in the UK. The good

news is that all of these are committed to building sustainability into their business models. However, without regulation and a more stringent approach to this escalation of over-production, leading to exploitative practices by some businesses to meet increasingly unsustainable consumer demand, the risk is that by default, we are all unintentionally complicit with an industry that relies on Modern Day Slavery for the clothes we wear every day.

Over the past decade, considerable governmental attention has been given to fashion and sustainability, from the UK government SCAP initiative starting in 2007, the ESF APPG set up in 2011, WRAP's waste and action resource programme that has developed since 2000 including the latest Textiles 2030 initiative, the Modern Slavery Act 2015, as well as a considerable range of actions relating to environmental and social practices affecting and affected by the fashion sector – such as the 25-year Environment Plan and the adopting of the 2030 Sustainable Development Goals.

The UK fashion industry has undertaken considerable activity in response to the sector's unsustainable practices over an extended period; individually, but wide in scale, from M&S Plan A, launched in 2007, Apparel and General Merchandise Public Private Protocol (AGM PPP), through to ASOS Fashion with Integrity programme 2020. A diverse and distinctive range of sustainability-led practices undertaken by its MSE sector is outlined in

a recent AHRC funded study, *Fostering Sustainable Practices*<sup>5</sup>. However, these actions are vastly outweighed and outsized by the negative impacts caused by the fashion sector overall, in ecological and in social terms. Whilst there is evidence of changing customer attitudes<sup>6</sup>, these changes in buying practice are not yet sufficient in themselves to incentivize or enable the sector to shift its focus from economic gain at any cost. Without addressing these issues, government policy will continue to give licence to harm and not reward good practice.

This report draws on primary research and a series of evidence sessions undertaken by the ESF APPG. The report also references the findings of the Environmental Audit Committee (EAC)'s *Fixing Fashion* report 2018 and submitted evidence to their follow up report, which will be published soon. The report also draws research from key environmental and social policies and initiatives which highlight how the Paris Agreement, potential COP26 commitments and wider UK environmental, social and economic agendas can be realised through our core recommendations.

This paper, published between the successful G7 summit and upcoming COP26, emphasises the UK government's potential to play a global leadership role in the solutions required for the fashion industry to be truly sustainable. There is an ethical and environmental imperative, in tandem with an exciting innovative opportunity for the government to realise sustainability ambitions through this highly visible sector. An

opportunity that involves substantial economic activity, with annual expenditure on clothing in the UK valued at £54 billion by the Office of National Statistics<sup>7</sup>, which is estimated to grow to £67 billion by 2026.

To gather an understanding of attitudes on the issues relevant towards cleaning up the fashion industry, the ESF APPG heard oral evidence from key stakeholders through numerous evidence sessions, as well as via a sector-wide survey allowing for us to collect evidence from a broad array of industry members with unique perspectives on the sector and its handling of current issues. This diversity of thought and opinion is most likely to generate the solutions necessary to reverse endemic and structural practices that negatively affect the environment and its population. The ESF APPG also engaged in several meetings with Governmental departments, including the Department for Business, Energy and Industrial Strategy, the Department for Environment, Food and Rural Affairs and the Home Office on sustainability and labour exploitation in the fashion industry over the past 15 months, as well as the Environmental Audit Committee (EAC), BEIS Select Committee, DCMS Select Committee and the Migration Advisory Committee.

This report also draws on the findings from over two and a half year's research into the creative and business practices in design-led fashion micro and small enterprises (MSEs) as a potential driver for transformational change, *Rethinking Fashion Design Entrepreneurship: Fostering Sustainable Practices (FSP)*.

# SURVEY FINDINGS

The Fashion Roundtable survey engagement, on behalf of the ESF APPG, has enabled Fashion Roundtable to compile and consider evidence from a broad array of industry members with unique perspectives on current issues. We believe that this is incredibly important for two key reasons: first, we must ensure that solutions are developed which will benefit all and thus it is important that issue identification and solution building is done by consulting with the businesses and individuals which constitute the industry we wish to make a better place. Second, it is with diversity of thought and opinion that the industry is most likely to generate the solutions necessary to reverse endemic and structural practices that create the greatest negative externalities that affect the climate, nature and individuals.

The key findings from Fashion Roundtable's survey are as follows:

## 43%

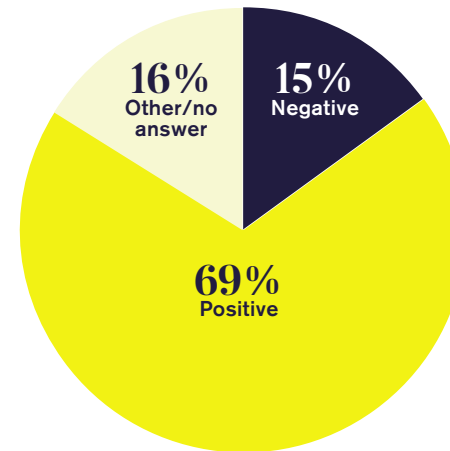
of respondents chose the top level of concern when asked how problematic they believed the issue of Modern Slavery in the UK was.

## 53%

of respondents expressed a clear preference for a focus on onshoring. 30% noted the benefits that onshoring could provide but recognised the complexity of such a move for the impacts both in the UK and globally. Many highlighted the need for fair wages and better work environments in the UK in order for onshoring to work. Others raised the issue of the negative impact onshoring could have on the current garment workers in global supply chains.

## 33%

Surprisingly, only 33% of respondents explicitly mentioned Government action when asked what changes need to be made to work toward a more sustainable future in the fashion industry. Conversely, 58% of responses highlighted an industry recommendation.



## SUSTAINABILITY & BUSINESS PRACTICE

Asked explicitly whether Government support should be provided to embed sustainability into business practice, 110 respondents gave the above feedback, ranging from a broad array of industry leaders to consumers.

## 72%

of respondents self-certified at the top level of concern about the climate crisis

## 24.5%

of respondents self-certified at the top level of concern about the impact of COVID-19 on their business.

## DIVERSE RESPONSES

A surprising finding was the diversity of responses that we received about how to make supply chains more transparent. Responses and suggestions included: an onus on consumers to not support brands with low transparency, the implementation of traceability technology and software such as blockchain, strengthening legislation to hold brands legally accountable for poor practice, brands increasing their prices, calls for international regulation and increased education on the issues for brands and consumers. Whilst almost all solutions proffered were practicable and sensible, the diversity of responses might evidence a strong willingness to tackle the issue amongst the industry, but a lack of consensus and understanding of the best way to do it.

## PROOF OF EVIDENCE

This might evidence two realities: a preference amongst stakeholders for the Government model predicated upon a system based on self-regulation, goodwill and non-legally binding mechanisms, or, a lack of education about the steps that the Government could take in order to legally bind firms to operate in a mindful manner concerning workers' rights and the environment.

# COLLECTIVE ACTION FOR NET ZERO EMISSIONS

The UK has made important first steps in shifting to a cleaner and more sustainable future, but there is still a long way to go if the UK is to reach 'net-zero' by 2050.

As a major contributor to pollution and a perpetrator of unsustainable practices, the fashion industry has the potential to play a significant role in helping to meet climate goals due to its current and predicted impacts, combined with its potential for rapid and radical change. The fashion industry draws attention to the critical interdependencies between culture, society, environment and economy<sup>8</sup>.

Climate change imperatives, laid out in UK and Global commitments, require system wide change across the fashion sector. This requires a joined-up approach to create the systemic change needed to achieve a decarbonised economy. This paper calls for a civil service shake up. Currently, any industry or sector must navigate the challenges of working with different departments for different aspects of their work. For instance, within fashion, fashion retail and fashion manufacturing, the sector has to engage across several governmental departments including DCMS, BEIS, DEFRA, the Cabinet Office, the Home Office, DFCO, DfE, and DIT. While the DCMS Industrial Strategy was a strong roadmap for alignment between BEIS and DCMS, leading to the Build Back Better initiative<sup>9</sup>, we are calling for a more sustainably effective Whitehall approach, with one contact across government for the entire fashion industry. This would provide coherence in understanding the complexities and generating solutions to meet the government's levelling up agenda<sup>10</sup>, race to net zero and supporting onshoring, focusing on both the environmental agenda and protections against worker exploitation.

Jessica Sparks, Associate Director of the Ecosystems and the Environment at University of Nottingham's Rights Lab, highlighted to the group the importance of understanding the links between environmental impacts and exploitative labour "because exploitative labour acts as a subsidy, it drives down production cost". This need to understand the sectoral issues as a whole rather than in separate silos is evidence of the need for them to be handled as a whole by UK policymakers.

A joined-up approach within government can be aligned to global alliances and coalitions. The value and importance of a sectoral approach is already in evidence at UNFCCC level through the UNFCCC Fashion Charter, connecting businesses across the fashion supply chain in a co-ordinated action plan in the Race to Zero<sup>11</sup>. A second example can be seen in France, through the Fashion Pact<sup>12</sup>, connecting action at government level with a range of industry actors. The approach of COP26 in Autumn of this year, with the need for further commitments in order to reach the goal of limiting global warming to 1.5 degrees, should focus the UK government to recognise the drastic impact a joined-up approach to textile and fashion industry policy could make, both globally and at home. Thus far, when presented with fashion specific issues, the government has been unable to respond with fashion specific recommendations. The response to the EAC report cited A Green Future: Our 25 Year Plan to Improve the Environment<sup>13</sup> and the report Our Waste, Our Resources: A Strategy for England<sup>14</sup>, nei-

ther of which were sector specific, and instead offered a generalised approach that lacked the specificity needed to reach a decarbonised fashion industry. Since then, the role of SCAP, leading into WRAP initiative Textiles 2030, offers a sector-based approach, but with a focus on one part of the symptoms of a stimulation and supply led model. This does not scope the necessary joining up of government departments, businesses, academia, education, NGOs, communities and citizens in an extending of the value of resources, despite its impressive scope it cannot be pointed to as an example of the government creating an environment fit for collective action. Further, as noted by the EAC<sup>15</sup>, underfunding of this work by the government remains. Whilst retailers are signatories, and therefore able to provide examples of ways to fulfil WRAP's targets, there is an opportunity for this work to be escalated through a scheme where signatories contribute to funding its work, without compromising its impartiality. The evidence of the ability of MSEs to contribute to the Race to Zero through a joined-up approach should be supported and their examples act as prototypes for change at scale.

The government's current position on the fashion industry is at odds with its May 2020 declaration of a climate emergency, committing to reduce the UK's carbon emissions by 80% by 2050<sup>16</sup>. WRAP targets should be mandatory: companies with a turnover of more than £36 million should be required to adhere to Textiles 2030, and economic incentives to reduce emissions to net zero should be made clear by the government.



# SUPPORT FOR SUSTAINABLE BUSINESS AND WASTE ELIMINATION

Textile production contributes more to climate change than international aviation and shipping combined, consumes vast quantities of water and is a significant contributor to plastic and chemical pollution<sup>17</sup>.

Every year, it is estimated that textile production uses 1.2 billion tonnes of CO<sub>2</sub><sup>19</sup>. The UK buys more clothes per capita than any other country in Europe - an estimated 1,130,000 tonnes in 2016 alone<sup>19</sup>. In terms of items bought, this was 2.1 billion units of clothing in 2017, compared with the US's 17 billion and China's 40 billion in the same year<sup>20</sup>. Due to a lack of universal standardised sizing across brands, customers are increasingly buying multiple sizes of the same item in order to find the size that fits and returning those that do not<sup>21</sup>. This therefore increases delivery and courier service usage and overproduction of garments by brands. The growth of online sales due to the pandemic and change in consumer habits from bricks and mortar to online retail, has in turn caused a loss in secure employment for retail workers<sup>22</sup>, many of whom are female and are unionised, and instead a rise in courier workers working on zero-hour contracts<sup>23</sup>, emphasising the nexus of environmental and social impacts of the industry.

Compounding the issues of overconsumption, our recycling leaves much to be desired. In the UK, WRAP has estimated that £140 million worth of clothing goes to landfill every year<sup>24</sup>. If the industry is going to reduce its environmental impact, improvements towards more sustainable production will not be enough if our rate of production and consumption remain as high as they currently are<sup>25</sup>. But this is not just a UK problem; the Ellen MacArthur foundation estimates that more than \$500 billion of value is lost every year, due to clothing underutilisation and the lack of recycling<sup>26</sup>.

There is a clear need to make extending the life of clothes more economically viable. This could be stimulated through changes in taxation policy incentives for UK brands demonstrating sustainability through resourceful design, manufacture and service models. Through identifying these businesses around the UK, a levelling up could be achieved alongside environmental sustainability.

It was evident from the APPG sessions that there is a desire for governmental support for innovative and sustainable business models. Sophie Slater, CEO of Birdsong suggested several business stimulants that would level the playing field for fashion businesses:

- **Rent controls and subsidised high street space for social enterprises or community groups (a point that was echoed by Maria Chenoweth of TRAIID).**
- **Tax breaks for B Corps and companies with proven positive social and environmental contributions.**
- **VAT decrease for stringent observation of human rights impact and voluntary due diligence.**
- **NIC breaks for employing people facing barriers to work at living wages.**

Victoria Prew, CEO and Co-Founder of HURR Collective outlined the economic and environmental opportunities of innovative business models such as

rental, telling the APPG that:

- **The UK rental market is expected to reach £2.3 billion by 2029.**
- **Through the rental model, thousands of items are rented across the platform every month, reducing the impact of overconsumption and extending item lifecycles.**
- **Prew further recommended the government look into tax breaks for rental models.**

Rental business model growth is encouraging as a new approach to tackle increasing rate of clothes consumption, which while it feeds the consumer endorphin rush of wearing new clothes for the first time, does not address the reasons and issues of why consumption levels have escalated in a generation. Therefore, while renting could lead to a reduction in the number of items produced, as renters share outfits they have hired rather than purchased, and is certainly an option in changing business models towards more sustainable approaches and altering consumer habits<sup>27</sup>, it should not be viewed as the panacea to fix fashion.

To tackle the problem of clothes in circulation ending up in landfill it has been made evident that improvement to extension of the life of clothes is not possible without investment in infrastructure.

In terms of the customer recycling their clothing, the APPG learned from Maria Chenoweth, Chief

Executive at TRAIID, that:

- **Over the past 6 years the number of textile banks has decreased by 42%, but in contrast, usage of textile banks, and the amount of textiles being put into the banks, has increased by 25%.**
- **Chenoweth surmised from this that there is increased public engagement with textile banks and recycling but less opportunity to recycle textiles.**

However, the availability of textile recycling facilities to consumers in the UK is limited and legally binding mechanisms that incentivise waste management are lacking. The Government should work closely and support recycling and waste management companies such as The First Mile, while also significantly investing in regular collection of clothing waste led by local authority councils and brands. All of this must come alongside significant investment and incentivisation from the Government - including investment in widespread municipal waste facilities, kerbside collections and tax breaks for sustainable brands. Without this, voluntary action and initiatives led by brands and other businesses, no matter how commendable, will remain a drop in the ocean.

However, whilst clothing charity TRAIID provides an important service in ensuring recycled items are sold on, extending their life cycle, the issue remains

of the sheer volume of items in the system. Especially considering how discarded clothing is often exported to the global south, where it competes with and undermines local trade and textile production<sup>28</sup>.

Therefore, in order to drastically reduce the negative environmental and social impact of fashion, there must be a reduction in material throughput. Chenoweth highlighted to the APPG that "if people bought more second hand clothes this would reduce the impact on the environment because this would mean less clothing production". This points to a need to focus on significantly reducing the waste problem at source, rather than only at the end of line, where current focus and funding is placed. The amount of clothing in circulation is too much for the recycling, rental, or resale markets to handle. The Extended Producer Responsibility (EPR) scheme outlined in the EAC recommendations would put the onus on the brand or retailer producing the clothes to take responsibility for what happens throughout its life<sup>29</sup>, with the potential to encourage a decrease in the volume of production. We welcome that a textiles EPR is now being explored through the consultation by DEFRA<sup>30</sup>.

In order to create lasting change in the fashion sector, the culture of business must transform to promote systems of extended value. The exploration of the EPR scheme for textiles is a first step and needs to be combined with an overall reduction in clothing production and output.

**"There's always been this overarching push to expand and get bigger and get better and have more money. Everyone has always been like: you should be making it in Portugal or Turkey, and you can make profit. It's been very hard just to be actually a Made in UK brand."<sup>31</sup>**

**PHOEBE ENGLISH**

# EXPEDITE MODERN SLAVERY ACT CHANGES AND INTRODUCE A GARMENT ADJUDICATOR

The UK Modern Slavery Act (2015) was introduced to compel firms to eradicate modern slavery from their activities and their global supply network. At the time the Modern Slavery Act (MSA) was considered a world leading piece of legislation.

The law states that any business which supplies goods and services in the UK and has a global turnover of at least £36 million is expected to publish an annual slavery and human trafficking statement, known as a Modern Slavery Statement. Should businesses fail to comply, they may face civil proceedings in the High Court.

However, the complexity of modern slavery and the novel scope of the legislation itself have meant that, as the years have passed, noticeable deficiencies have become apparent. At present, businesses are only required to submit Modern Slavery Statements which are:

- a) Published clearly on the company's website.
- b) Approved by the board of directors.
- c) Signed by a director. Until this year, there was no government-run repository where these statements could be monitored<sup>32</sup>.

There remains a lack of mandatory reporting criteria: while Section 54 of the MSA lists six areas which companies could cover in their statements, they are not obligated to do so<sup>33</sup>. Additionally, the MSA states that a Modern Slavery Statement for a financial year can include "a statement that the organisation has taken no such steps".<sup>34</sup>

It has been estimated that a staggering 40% of in

scope companies are yet to publish annual Modern Slavery Statements and in the six years since the MSA was passed, not a single injunction or administrative penalty has been applied to a company for failing to issue a report<sup>35</sup>. Of the 60% of companies who publish statements under the scope of the MSA, a majority of the statements issued are general and do not fully comply with the intention of the law<sup>36</sup>. Ultimately, the BHRRC, concluded that the act has:

*"not driven significant improvement in corporate practice to eliminate modern slavery because it does not place any legally binding standards on companies to undertake efforts to effectively address risks of labour exploitation in their business operations."*<sup>37</sup>

The reluctance to punish those who fail to report under the scope of the MSA risks limiting transparency and acknowledgement of modern slavery in supply chains.

The ESF APPG heard from numerous experts, during evidence sessions, who cited additional issues with the current incarnation of the MSA. Some of the key insights are as follows:

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**PROFESSOR  
PAROSHA CHANDRAN**  
Barrister, One Pump Court  
Professor of Modern Slavery Law,  
King's College London

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Professor Chandran stated that criminal legislation is not robust enough and there is a lack of corporate accountability. Because there is no extraterritorial liability for Section 1<sup>38</sup> of the act, a British national or corporation may commit forced labour, slavery or servitude overseas and face no legal liability. Although the Council of Europe Convention on Action against Trafficking in Human Beings 2005 entered into force in the UK in 2009, some features of the Convention were never incorporated into UK law.

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**TATIANA GREN-JARDAN**  
Head of Modern Slavery Unit  
Centre for Social Justicea

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Gren-Jardan mentioned that part of the problem is that workers and victims are often penalised when the authorities become involved, which can disincentivise whistleblowing or cooperation with the authorities. To rectify this, victims should be put first, and the government should look into pervasive levels of criminality and corruption rather than just surface-level criminal activity.

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**TAMARA BARNETT**  
**Director of Operations**  
**Human Trafficking Foundation**

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Barnett highlighted that there is a significant overlap between industries where victims of modern slavery are found and sectors where lesser violations of employment law, such as underpayment of the minimum wage occur. This suggests that recipients of one form of non-compliant behaviour may be victims of other forms of non-compliant behaviour.

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**KATE ELSAYED - ALI**  
**Anti-Slavery International**

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Elsayed-Ali suggested that the critical limitation of the MSA is the lack of clarity, guidance, monitoring and enforcement of modern slavery statements.

An independent review of the MSA, conducted by Frank Field, Baroness Elizabeth Butler-Sloss and Maria Miller, concluded that there were significant deficiencies in legislation and impressed upon the Government the importance of the MSA keeping pace with the “ever-evolving threats modern slavery presents” and that “implementation is as important as legislation”<sup>39</sup>. The review made a total of 80 recommendations to the Government for review in order to improve MSA legislation.

In response, the Government launched a consultation and accepted a many of the recommendations, stating that “this review will shape a significant part of our future response to modern slavery”<sup>40</sup>. Since then, the Government has delivered on their commitment to set-up a government-run Modern Slavery Statement repository, which was launched on 11th March 2021. Furthermore, the Government recognised that the MSA should be extended to the public sector, and that Government departments, local government, agencies and other public authorities must publish a Modern Slavery Statement if their annual budget exceed £36 million<sup>41</sup>. In 2020 the Government published their first Modern Slavery Statement which sets out the Government’s efforts to eradicate modern slavery from its own supply chains<sup>42</sup>. Other key recommendations were accepted but have yet to be acted upon include:

- A single reporting deadline for firms to publish their statements by.
- The introduction of mandatory reporting criteria.
- Statutory guidance will be strengthened to include a template of the information organisations are expected to provide.
- The Government is consulting and exploring potential enforcement options and mechanisms.

Unfortunately, the Government rejected a number of key recommendations made in the review. Notably, they declined the recommendation that it should be an offence under the Company Directors Disqualification Act 1986 for in scope companies to not comply with modern slavery reporting requirements or to fail to act when modern slavery instances are discovered<sup>43</sup>.

During evidence sessions, the ESF APPG heard many recommendations for how to expedite positive changes to improve the MSA from industry stakeholders and experts:

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**DR. NIKOLAUS HAMMER**  
**Professor in Work and Employment Policy**  
**University of Leicester**

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Dr. Hammer advocated for increasing transparency in supply chains, mandatory human rights due diligence, granting powers to non-governmental organisations and supporting trade unions to build trust in the community. These are all areas which fashion businesses can improve on a voluntary basis and can play a role in advocating for legislative change from the Government.

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**MEG LEWIS**  
**Campaigns Director**  
**Labour Behind the Label**

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Lewis added that MSA enforcement issues are exacerbated in the UK because facility searchers are focussed on finding people who are not in the country legally rather than revealing illegal work practises.

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**DAME SARA THORNTON**  
**Anti-Slavery Commissioner**

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Dame Thornton spoke on the adjustments needed in public services in order to tackle modern slavery in the UK. The Commissioner recommended some areas that the Government could look to improve including:

- Supporting law enforcement by providing more training, improving the implementation of the statutory defence within the act, and increasing prosecutions.
- Strengthening victim care and support by improving identification of victims of modern slavery, encouraging more extended term support to include housing, health and employment, exploring a public health approach to modern slavery, and advocating for local decision-making for children.
- Focusing on prevention, encouraging business responses, incorporating public sector supply chains into legislation, increasing public awareness and encouraging international efforts in countries of origin.
- Introducing a single enforcement body and mandatory human rights due diligence.

Additionally, stakeholders called for legally binding and enforceable standards which ensure that due diligence is undertaken. These must be enforced and address the deficiencies that have been highlighted in the MSA. In order to see effective change, companies must be made responsible for failures to prevent human and labour rights harms within their business operations. Specifically, the creation of a 'failure to prevent' law would generate a more robust approach to tackling irresponsible

behaviour and hold firms to account for failing to prevent negative human rights, or environmental, impacts<sup>44</sup>. Additionally, it is recommended that this mechanism should establish a right to civil action by those affected to gain compensation<sup>45</sup>. This would be a stronger response than simply expecting companies to undertake due diligence and could enhance trust in the fashion system.

Alongside legislation such as the MSA and a potential 'failure to prevent' law, a UK-wide Garment Adjudicator would ensure a robust response to calls for transparency and accountability in the UK fashion sector, particularly in light of the recent Leicester garment factory scandals. This could restore confidence in the UK garment manufacturing sector. A trusted UK fashion system is required for the country to be a destination for fashion product design, manufacturing, services and sales, and is an opportunity to grow UK ethical manufacturing and production:

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**FIONA GOOCH**  
**Campaigns Director**  
**Labour Behind the Label**

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Gooch proposed that sector wide policy change is necessary and that this change should be transparent and publicly available. A garment fair purchasing practices regulator should be established to facilitate these changes because voluntary codes are insufficient:

- Present enforcement of legislation through contract law is ineffective, for example the Prompt Payment Code should be moved to a statutory footing and Human Rights Due Diligence should be mandatory.
- The Department for Business, Energy and Industrial Strategy (BEIS) urgently needs to establish a Fashion Watchdog and appoint a Garment Trading Adjudicator to halt abusive purchasing practises. This Garment Trading Adjudicator could be modelled on the Groceries Code Adjudicator, the independent regulator responsible for monitoring and strengthening compliance with the Groceries Supply Code of Practise (a code of fair purchasing for the UK's largest food retailers).

Traidcraft Exchange found that the creation of a Groceries Code Adjudicator (GCA) in the early 2010s has "made a huge difference". In 2014, 80% of supermarket suppliers told the GCA that they experienced abusive purchasing practises, by 2021 this number had dropped to just 30%<sup>46</sup>. Evidently the creation of an independent regulator has had a positive effect on supermarket supply chains. In response to the EAC recommendation that retailers ensure full traceability, to improve livelihoods and guarantee that resources are sourced sustainably, the government merely stated that they would explore further action in the future, rather than recognising what already exists, or obliging full

traceability, despite referencing tools such as WRAP's Sustainable Product Toolkit . In the case of the proposed Garment Trading Adjudicator, Traidcraft Exchange recommends that the government consults on how the adjudicator should operate, the contents of the statutory code and which retailers should be in scope, given the success of the GCA.

Whilst the government has committed to a broad array of changes to the Modern Slavery Act, we urge the government to expedite the promised legislative changes. It is currently committed to introducing changes "when parliamentary time allows". The ESF APPG asks for a timeline on this process. On top of this, the APPG calls for the creation of a UK Garment Adjudicator in order to better monitor and strengthen business compliance with legislation.

# UYGHUR CRISIS EVIDENCE SESSIONS

Since 2017, it is estimated that more than one million Uyghur Muslims have been relocated to high security “de-extremification” and “re-education” camps, where they are forced to produce industrial and agricultural goods for export.<sup>47</sup>

In the four years since this relocation started, the Chinese government has come under increasing scrutiny from CSOs, International Organisations and governments for the treatment of the Uyghur population. There is increasing evidence that the Uyghur population, and other ethnic minorities are the subject of systematic human rights violations throughout the region including forced labour<sup>48</sup>.

Allegations emanating from the region have led to many governmental and legislative responses across the globe. The United States, Canada, and the Netherlands have all accused China of committing genocide and whilst the UK government has fallen short of terming atrocities genocide, it has accused China of “gross” human rights abuses<sup>49</sup>. In the wake of mounting evidence, the Foreign Secretary, Dominic Raab MP, issued a statement to the House of Commons on January 12th 2021. In his statement, Mr Raab highlighted the “diverse and growing body of evidence” surrounding the “scale and severity of human rights violations” perpetrated in Xinjiang and announced an imminent review into export controls to reduce the complicity of UK firms in acts of genocide<sup>50</sup>. A follow-up statement was made in March 2021, where it was announced that, in coordination with international partners, the UK would introduce sanctions on senior individuals responsible for the violations and organisations culpable, for the violations including the freezing of assets and travel bans<sup>51</sup>. In April 2021, the House of Commons

declared that genocide was taking place against the Uyghurs, and whilst this does not compel the government to act, it is a sign of growing discontent towards the Chinese government in Parliament. Rahima Mahmut, UK Project Director at World Uyghur Congress informed the ESF APPG that “the UK has made very little headway in addressing the issues in East Turkestan which have existed for much longer than the current media interest”. Mahmut further explained how Uyghurs in the UK do not feel safe and that “there is enough information to act, the question now is if the UK will”.

The ESF APPG held an evidence session on the subject, during which it was made clear the role of the industry in perpetuating and tacitly supporting human and labour rights abuses globally, with a specific focus on the cotton industry. During the session, the APPG heard clearly how involved the fashion and textiles industries are in the use of forced labour in Xinjiang. Chrisitna Hajagos-Clausen, Textiles and Garment Industry at IndustriALL Global Union informed the group that:

- **Xinjiang produces 80% of China’s cotton, and the USDA estimates that 75% of China’s exported cotton comes from Xinjiang.**
- **China accounts for over 22% of the world’s total cotton production, a vast majority of which was produced in Xinjiang.**

- **China exports cotton fabric to over 120 countries, accounting for over 30% of global trade, and this fabric ends up in key garment production states such as Bangladesh, Vietnam and the Philippines.**

In response to reported abuses in Xinjiang, the Better Cotton Initiative (BCI), an independent industry body that promotes sustainable and ethical standards, has stopped auditing and certifying farms in Xinjiang<sup>52</sup>. The BCI expressed concern that the operating environment would make it impossible to provide credible assurance and that it had hired an expert to conduct a review to document the situation in China, evaluate the risk level and propose mitigation and remediation steps.<sup>53</sup>

Following a report from the BBC, the Business, Energy and Industrial Strategy Select Committee (BEISCOMM) wrote to a number of companies to ask for clarification of their links to the region and an explanation on the degree of accuracy within their supply chain transparency<sup>54</sup>. All of the companies who were written to denied sourcing products directly from the region, and a number noted that although they did not have business relationships within the region, they could not definitively guarantee that cotton sourced from the region did not enter their supply chains<sup>55</sup>.

As cotton produced in Xinjiang is so pervasive in international supply chains, it is critical that solutions



are found, and initiatives put in place so that the fashion industry is not culpable in the perpetuation of abuses directed toward the Uyghur people. Without sufficient due-diligence and supply chain transparency, firms might find themselves utilising cotton cultivated and produced in dire circumstances.

The APPG evidence session sought to understand how the international community, UK government and the fashion industry can work toward ensuring that they do not source cotton produced under forced labour from China.

Internationally, the group heard from Louisa Greve, Director of Global Advocacy at Uyghur Human Rights Project about the measures that other nations had taken already, particularly those of the United States. The US have introduced several measures, including sanctions, import and export bans, a visa ban on officials, the provision of Supply Chain Business Advisory by US Departments, a determination of genocide and crimes against humanity and there are pending bills on Uyghur Forced Labour Prevention and Uyghur Human Rights Protection.

Regarding the UK approach, Dr. Kate Ferguson, Co-Executive Director and Head of Research and Policy at Protection Approaches outlined that:

- **the UK currently has no formal policy on preventing genocide or combatting**

**identity-based violence and widespread discrimination abroad. Although it was acknowledged that this government was making a greater effort, it is believed to be “highly unlikely” that UK officials in Beijing have received atrocity prevention training or instructed upon the UK’s policy and position about the atrocities in Xinjiang.**

- **Explicitly, it was recommended that the UK government enact the following:**

- The government should make a declaration of genocide in Xinjiang.
- The UK should announce a package, using the tools the UK already has at its disposal to get a sanctions regime going which can be implemented following leaving the EU.
- Halt deportations to China.
- Announce an inquiry into how the profits from genocide and rights abuses in China are passed through the United Kingdom.
- Invite Uyghur representatives to hold discussions with the UK government.
- Provide atrocity prevention training to officials working on, with, and in China.

- Announce an atrocity prevention policy.

Dr. Ferguson was keen to stress that, although these remarks are directed toward the UK’s state apparatus, that businesses can also elect to adopt atrocity prevention, or a system of protection that considers how to mitigate the risk to populations facing human rights abuses.

On the solutions that brands can introduce, evidence was heard from Penelope Kyriitis, Director of Strategic Research at Worker Rights Consortium:

- **There is a difficulty in using traditional labour rights due-diligence measures in Xinjiang as the conditions are not suitable to hear accurately from managers and labourers. Whilst, in most countries, the worst risk garment workers face for speaking out is unemployment, in Xinjiang, it is incarceration and potentially torture or death. There were several key recommendations made that brands should undertake to end complicity in Xinjiang:**

- Cease sourcing from facilities in Xinjiang.
- Require suppliers and sub-suppliers to exclude cotton from Xinjiang at all levels of the supply chain.
- Require suppliers in China to decline participation

in the government scheme to forcibly move workers from Xinjiang.

- Cut ties with companies implicated in incidents of forced labour.

Some fashion brands are showing commendable leadership, by not sourcing their cotton from Xingang, to circumvent the very real threat of cotton produced by forced labour being part of the clothes they sell. The ESF APPG heard both of a lack of transparency in Xingang, due to complex sub-supplier networks, combined with threats being made to sourcing teams on the ground to silence whistle-blowers. Ultimately, the burden of responsibility must fall upon the government. There is a need for government action, rather than individual corporate responsibility. A vast number of global corporations are continuing to source goods from the region, and the scope of the problem is endemic. For those not acting to improve their transparency and responsibility and end their complicity in the crimes in Xinjiang, the UK government needs to make such actions illegal via legislation.

# INCREASE IN BUSINESS RESPONSIBILITY FOR APPAREL SUPPLY CHAINS

The COVID-19 pandemic has created an exceptionally challenging environment for businesses and workers, which has highlighted some of the most pressing issues facing the fashion industry today.

As retailers were forced to close around the world, fashion brands cancelled billions of dollars worth of orders. In Bangladesh alone, McKinsey estimated that by March 2020 Western fashion brands had cancelled \$2.8 billion (USD) worth of orders, affecting 1.2 million workers<sup>56</sup>. While cancelled orders have clearly put workers' livelihoods and fashion supply chain stakeholders at risk, millions of workers have been denied wages owed to them for work already completed. While the #PayUp campaign has helped suppliers recover around \$22 billion in cancelled orders, it conservatively estimates that garment workers are still owed up to \$5.8 billion for the first three months of the pandemic alone<sup>57</sup>.

A report authored by the BHRRC, claimed that globally tens of thousands of garment workers lost their job over the last year. One in four of these did not receive legally mandated severance pay and 77% of garment workers have gone hungry since the beginning of the pandemic as suppliers cut wages and closed production<sup>58</sup>. Another report authored by Mark Anner, Ph.D., Director, Center for Global Workers' Rights in Association with the Worker Rights Consortium found that 65% of apparel suppliers reported that buyers have demanded price cuts greater than typically expected and an astonishing 56% of suppliers had been compelled to accept some orders below cost<sup>59</sup>. These practices have had a devastating effect on garment workers - it is reported that

wages have decreased during the duration of the pandemic by 21% and 88% of apparel supply chain workers have reported that diminished income has forced a reduction in food consumed each day by workers and their families<sup>60</sup>.

The ESF APPG heard evidence from several stakeholders about the impacts of the COVID-19 pandemic on the fashion supply chain in Bangladesh:

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**NAZMA AKTER**  
**Founder and Executive Director**  
**Awaj Foundation**

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Akter highlighted that the loss of work as a result of the pandemic has a clear gendered impact on women, who make up a significant proportion of garment workers in Bangladesh. There have been several large-scale protests in Bangladesh as a result of order cancellations and non-payment of wages which indicates an appetite for a change in the power dynamics between workers/suppliers and brands/retailers.

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**ANNA BRYHER**  
**Director, Labour Behind the Label**

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Bryher reported that many orders were cancelled at different times:

- Some orders were retroactively cancelled after they had been produced (in part or in whole). While some brands did eventually pay for these orders – often after pressure from the #PayUp campaign – others still refuse. Some brands postponed delivery of, and payment for, orders on an indefinite basis, while others demanded large price discounts in exchange for taking delivery and paying for goods.
- Currently, the most vulnerable supply chain stakeholders have been left to bear the brunt of the cost of cancelled orders and there is a growing humanitarian crisis for workers who have taken out loans to cover this loss of income after years of living on poverty line wages.
- It is a matter of urgency that employed workers are paid their missing wages and bonuses. Work needs to be done to map unpaid wages, severance and benefits between brands and their suppliers.
- Furthermore, there should be coordination with the ILO to see where funds can meet these costs: a cost sharing mechanism could be used to meet the gaps.



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**MOSTAFIZ UDDIN**  
CEO, Denim Expert Ltd,

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Uddin has experienced the pandemic's impact on Bangladeshi garment supply chains first-hand.

- Uddin paid his staff 100% of their wages through the pandemic putting himself heavily in debt. Suppliers like Mostafiz cannot pay off these loans until brands and retailers pay for their orders.
- This situation is exasperated by the global fashion industry's system of debt and mutual trust: the majority of suppliers raise loans based on previous invoices to pay for materials, wages, factory costs and shipping upfront when a clothing order is placed by a brand or retailer. These suppliers can only raise an invoice once the goods are shipped and then often have to wait weeks for payment.
- The pandemic has exposed how fashion suppliers carry much of the risk in the current global garment production model.
- Uddin suggested that Global fashion brands need to be held accountable for the non-payment of wages in their supply chains and insurance must become widespread for garment

factories in order to pay workers in times of crisis. Women in garment factories must be empowered to join trade unions in order to recognise and understand their rights. Additionally, a real living wage must be implemented alongside commitment from brands to pay wages better and ensure more fair employment contracts.

While this evidence centres on Bangladeshi garment workers, the majority of fashion supply chain stakeholders reside in countries with weaker social welfare and job security than the UK. By transferring financial risks onto their suppliers, brands support a fashion supply chain which is more susceptible to exploitation while the threat of mass unemployment makes workers vulnerable to abuse<sup>61</sup>. Indeed the global story of garment workers is often one of malpractice, exploitation, and systemic inequality.

During the COVID-19 pandemic, while garment workers went hungry, fashion brands continued to profit - the sixteen brands that constituted the BHRRC's report made \$10bn dollars in profits during the second half of 2020 alone<sup>62</sup>. The BHRRC went on to conclude that:

*"The business model of fashion brands and the structure of global garment supply chains do not inadvertently result in exploitative wage practices, but deliberately create, sustain and rely upon them."*<sup>63</sup>

Evidently, while the fashion industry's response to the COVID-19 pandemic has certainly catalysed and augmented serious supply chain issues - they were pervasive prior to the global crisis. During evidence sessions, the ESF APPG heard examples of endemic apparel supply chain issues:

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**MEG LEWIS**  
Campaigns Director  
Labour Behind the Label

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Lewis stated that part of the problem is poor purchasing practises which encourages a system of subcontracting to unaudited and unregulated suppliers. Supply chain transparency is the fundamental fight against labour exploitation.

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**NAZMA AKTER**  
Founder and Executive Director  
Awaj Foundation

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Akter added that the way current supplier to buyer relationships are structured creates a power imbalance which places the risk almost entirely on the suppliers. This makes workers particularly vulnerable to changes within the supplier-buyer dynamic. In Bangladesh, the lack of social protection, unemployment systems and insurance leaves garment workers particularly vulnerable to exploitation.

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**LOUISE ELDRIDGE**  
Policy and Communications Officer at  
CORE (Corporate Justice Coalition)

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Given that brands/retailers place orders months ahead, and do not pay suppliers until the shipments are delivered, there is no social security and workers have little resilience.

In addition we heard repeated evidence of the consequences of delayed payment, including trafficking, forced marriage, in some cases suicide, and abuse towards those at the bottom end of the supply chain.

The Worker Rights Consortium believes that a Severance Guarantee Fund, enforced through contracts between brands and worker representatives "is the only viable means to end the severance theft that has plagued garment workers" and calculated it would cost brands less than \$0.1 on a t-shirt in order to provide the economic stability garment workers need to survive the current crisis and to strengthen unemployment protection in the future<sup>64</sup>.

Additionally, brands which choose to source from cheaper labour economies should commit to paying a living wage through movements such as the Wage Forward Living Wage campaign<sup>65</sup>. By signing up to initiatives such as these, businesses can formalise their commitment to a just supply chain and ensure

that they are not exploiting some of the most vulnerable groups of the international labour force. Whilst binding legislation is preferable to voluntary initiatives, which have been proven to be ineffective, until legislation is implemented brands should work to ensure that those within their supply chains are paid a living wage and that they increase their transparency on issues of payment. Furthermore, conducting a greater level of due-diligence, and increasing transparency around a firm's operations, will increase accountability and should engender a move towards more sustainable and fairer payment practices.

The state of economic precarity that abusive purchasing practices, work insecurity, a focus on individual corporate social responsibility (CSR), rather than union representation for its workforce, combined with a runaway train, ever speeding 'fast fashion' economic model, creates a broken system, where those who make our clothes are all too often exploited, undervalued and poorly paid. Should garment workers be offered a living wage, and brands take greater responsibility for those who rely on them for basic workers' rights, the impacts of the pandemic would have been far less severe<sup>66</sup>.

This issue is not purely a recent development, the pandemic has exposed and exacerbated the inequalities and malpractice that are deeply entrenched in the global operations of the fashion industry. Whilst many brands are taking welcome steps to improve their impact on workers and the

environment within their supply chains, concurrent crises in Leicester, Xinjiang, Bangladesh and Myanmar amongst others, evidence how far the industry has left to go and highlight the need for brands to take responsibility for their entire supply chain.

There is much scope for brands to take responsibility for their supply chains. But almost a decade since 2013's Rana Plaza disaster which killed 1,134 garment workers in Bangladesh, working in unsafe conditions for a plethora of household name fashion brands, they can no longer hide behind the idea that their supply chains are too complex for them to navigate. The pandemic has highlighted and exacerbated the trend within the industry to continue making vast profits, whilst not paying workers promptly or fairly, or even if at all, in too many cases. There are several key areas that brands must commit to as part of paying a living wage to workers:

- 1 ● are not squeezing suppliers to the point that they are creating fertile conditions for worker exploitation, worker abuse and financial instability. A simple way to achieve this would be to ring fence labour costs in purchasing orders, so as to ensure that workers are paid a living wage<sup>67</sup> .**
- 2 ● bargaining, formalising institutions which can protect the rights of workers in the future.**
- 3 ● that all fundamental human rights are met, protected and entrenched throughout their supply chains.**

# SUPPORTING UK MANUFACTURING AND SKILLS DEVELOPMENT

The ESF APPG heard evidence to support the notion that UK manufacturing could help to foster supply chain transparency. The UK is a world leader in fashion technology, and increasingly, practicable and affordable software and technology is becoming available which can help firms improve their supply chain transparency, sustainability, profitability and efficiency.

During one of the evidence sessions, we gathered evidence on how fashion technology can facilitate the transition to a sustainable UK fashion manufacturing sector.

## JENNY HOLLOWAY CEO of Fashion Enter

Holloway spoke about how to support ethical practices in garment supply chains and how this can promote UK manufacturing. Holloway was keen to stress that garments can be both made at affordable prices and ethically. At Fashion Enter they can make clothing both ethically and affordably using a system called Galaxius<sup>69</sup>. This enables business managers to accurately manage costs and offers live progress reporting and information on exactly who has worked on any particular garment. Holloway stated that within two months of implementing the Galaxius system, her factory moved from loss-making to generating a consistent surplus, with average rates of pay being £12 per hour whilst the highest earner is on £17 per hour.

## ABBIE MORRIS CEO of Compare Ethics

Morris gave evidence of the Compare Ethics technology, developed in collaboration with Imperial College London, which enhances accountability by

going beyond current reporting requirements. Morris suggested that the government should increase incentives for verified data sharing and examples of best practise, for example tax breaks for companies which commit to paying a living wage. Additionally, the Government can best support technology such as Compare Ethics by committing to an extension of the recently announced Competition and Markets Authority (CMA) investigation into 'misleading environmental claims'<sup>69</sup>.

One area in which businesses can immediately work to improve is the transparency of their supply chain. Although supply chain cognizance and transparency are not, in and of themselves, sufficient to ensure good practise, they allow consumers, CSOs and government institutions to hold firms accountable for breaches of the law and indeed highlight supply chain issues that may be unknown to brands. During one of the ESF APPG evidence sessions, Dr Mark Sumner, University of Leeds, highlighted the importance of a 'level playing field' and how a lack of transparency from firms and enforcement of current standards, creates a situation where firms can gain a competitive advantage from immoral business practices. Dr. Sumner did not believe that consumers are, at present, the right target for those wishing to raise awareness about business responsibility, warning of the danger of overloading consumers with information about ethics which has little effect on their actions. Instead, he believes that it

is better to inform institutional investors.

Education and skills development are key to securing livelihoods. Since the Ebacc was implemented in 2010, there has been a -38% decrease in GCSE arts numbers between 2010 - 2019. This sharp fall, combined with recent news of a proposal by the DfE to cut funding by 50%<sup>70</sup> to art and design courses at higher education institutions in England, is at odds with a jobs market, where pre-pandemic the UK fashion industry employed almost 1 million workers, 171,00<sup>71</sup> of those in design and designer fashion in 2019. The fashion sector offers the potential for a range of employment opportunities in the post-covid recovery period if, and when, education and skills development is tuned in to suit learner needs and business strategy. From MSE fashion design entrepreneurs with multi-dimensional roles, to specialist jobs in manufacturing, cleaning, repair and resale, there is a requirement for re-skilling, training and mentoring across age groups and skills levels. The testing and introduction of the lifelong loan system<sup>72</sup>, providing access to loans for technical training, is of particular relevance to the fashion sector, along with a need to expand in-work training.

# ONSHORING AND THE LEVELLING UP AGENDA

The government's 'levelling up agenda', a key point of reference during the Queen's speech, aims to "level up opportunities across all parts of the United Kingdom, supporting jobs, businesses and economic growth and addressing the impact of the pandemic on public services."<sup>73</sup>

Through onshoring a decarbonised fashion industry, connecting an on-demand supply chain involves skills not previously recognised in the fashion sector. The need to ensure investment and productivity are levelled out across the whole of the UK provides an opportunity for the government to value fashion's potential contribution to providing skilled and valuable jobs and income. The opportunity for transparency that national supply chain options could bring is an additional benefit to nurturing the re-introduction of garment manufacturing skills in the UK, the ESF APPG hear from Mick Cheema, General Manager at UK garment manufacturer Basic Premier that:

- Onshoring is generally beneficial to UK businesses because it helps to make their supply chains more transparent.
- However there is concern that the recent impacts of the pandemic and stories emerging from Leicester have damaged the onshoring agenda.
- UK garment manufacturing has a need for more skilled labour and education support to disseminate the rights of workers.
- There is a need for stricter enforcement of labour standards and transparency requirements, while rewarding good practise could support the increase of onshoring and UK-based e-commerce.

With Kate Hills, CEO, Make it British, highlighting that:

- **90% of the UK garment and textiles manufacturing industry has been lost in the last 30 years and the Government needs to invest more into UK manufacturing in order to encourage onshoring.**
- **Make it British has seen an 83% increase in interest in onshoring manufacturing, with many citing ‘transparency’ as a key driver in this decision.**

Jenny Holloway, CEO at Fashion Enter, has led the campaign to have garment workers added to the Shortage Occupation List (SOL) for visas for the past 3 years. Garment workers, in the majority, do not earn £25,600 (the amount required to apply for a ‘skilled worker’ UK visa<sup>74</sup>) although at Fashion Enter, they can earn £17 an hour. After the Brexit referendum, she and many other UK factory owners saw a 25% fall in their EU workers remaining in the UK, some of whom left immediately. Meanwhile, Kate Hills at Make It British highlighted that in the last 15 months she has seen an 83% increase in requests from larger and smaller brands to onshore their production back to the UK.

Considering the Leicester scandal, with the allegations of worker exploitation in fast fashion factories across the city, it is concerning that the

Migration Advisory Committee (MAC), when asked by Fashion Roundtable, as the secretariat for the ESF APPG, whether they had done an impact assessment to see if not adding garment workers to the SOL would prevent rises in modern slavery in UK garment production, replied they had not. In light of this, the ESF APPG recommends that garment workers be added to the SOL, at least until such time as the design and craft T Levels are rolled out in September 2023 and graduate into the workforce. Despite the ambition of the UK government to build back better, the T Levels to support garment worker training, which would otherwise cost an estimated £40,000 per worker by a factory owner according to Patrick Grant, Director of Bespoke Tailors<sup>75</sup>, have not been pushed forwards to support a growth in onshoring post pandemic and Brexit.

Given the lack of raw materials produced in the UK, combined with the current lack of manufacturing of certain key components, such as zips and buttons, in the volume required to meet all of the UK’s fashion manufacturing needs, it is highly unlikely that any drive towards onshoring would impact vastly on production in more economically vulnerable nations. Many workers in the Global South rely on the business of fashion brands in the UK and pulling production out completely would exacerbate their existing poor conditions.

Whilst the negative impacts of the fashion production system are predominantly experienced

by workers and businesses in global supply chains - there is recent evidence of how easily garment worker exploitation, abuse, and even modern slavery can occur within the UK. In June 2020, Labour Behind the Label found evidence that garment workers in Leicester factories were forced to work during the UK’s national lockdown, under conditions that were not safe and to work even if ill and showing symptoms of the virus for as little as £3.50 per hour, well below the UK minimum wage<sup>76</sup>. The UK also suffers from a disproportionate impact of the crisis falling upon women - and ranked amongst the European countries with the largest differences in wage bill loss between men and women<sup>77</sup>.

The UK fashion industry has huge recognition as a truly global leader: from Charles Worth, the “father of haute couture”, who hailed from Lincolnshire, to our iconic heritage brands, such as Hunter, Barbour and Johnstons of Elgin and Savile Row tailoring, such as Norton and Sons, Gieves and Hawkes and Andersen and Sheppard. A Made in the UK label offers prestige and reputation to a range of celebrated heritage, as well as newly launched fashion brands. The growth of homegrown sustainable fashion companies, such as Huit, a sustainable denim brand based in Wales, or designers Bethany Williams and Richard Malone, who both manufacture in the UK and show their award-winning collections at London Fashion Week, is a progressive next step for domicile talent displaying leadership in embedding sustainability into their business structure. These exciting

new generation talents showcase clothes where an ethos of resourcefulness and social justice are core to their values.

Whether a fashion brand is looking to onshore for sampling, for shorter lead time for deliveries, travel-time for their sourcing teams, or through a commitment to support local jobs and communities, this ambition should be core to the UK government’s plans for levelling up and “build back better” agendas. Support for good jobs and developing the skills required in a decarbonised economy post-covid are essential.

The British Film Institute<sup>78</sup>, backed by DCMS and the National Lottery, offers funding to support film and TV production partly or wholly made in the UK. In tandem, UK Tax Film Relief<sup>79</sup> is available for all British qualifying films of any budget level; the film production company can claim a payable cash rebate of up to 25% of UK qualifying expenditure. This is capped at 80% of core expenditure with no budget limit. This support has stabilised UK film making and incentivises international productions to work here. The ESF APPG calls for similar funding incentives to support UK fashion production and manufacturing which demonstrates transparency and accountability, providing localised jobs and supporting domicile talent into sustainable and fulfilling work.

# MEASURES OF SUCCESS FOR A JUST TRANSITION AND WELLBEING ECONOMY

The evidence sessions have worked to highlight a need for a new model for fashion business that recognises prosperity in social, economic, and environmental terms.

However, there are no metrics that recognise this broader measure of prosperity across the sector and beyond it. But the just transition, as defined by the ILO, encourages the introduction of measures of business success beyond solely economic indicators. The ILO states that:

*“a just transition for all towards an environmentally sustainable economy...needs to be well managed and contribute to the goals of decent work for all, social inclusion and the eradication of poverty.”<sup>80</sup>*

As the APPG heard from Jessica Sparks, Nottingham University, “climate change and modern slavery are not linear relationships” - the just transition to a sustainable economy will require a joined-up approach that tackles environmental and social issues together, and understand social protections to be key to the race to net zero.

Companies investing in technologies and practices that enable sustainable production create value for the overall economy<sup>81</sup>. These benefits include, but are not limited to, creating new and green jobs, improved competitiveness, cleaner air, enhanced energy resources, better transportation and housing. These benefits translate into healthier and happier societies, as they amount to significant health gains, improved living conditions, and a decrease in poverty and inequality.

Moving towards a more sustainable economy

has been evidenced to provide greater economic potential than not doing so. A sustainable economy enables individuals to have a healthier, more fulfilling life: countries that do better in terms of Sustainable Development Goals (SDGs) are ranked higher in happiness and human well-being<sup>82</sup>. The UK Clean Growth Strategy estimated that the low-carbon sector of the economy will grow by 11% between 2015 and 2030, four times faster than the overall economy, and will amount to £60-170 billion in exports<sup>83</sup>. Addressing fashion and beauty industries at the Vogue Business Sustainability Forum, COP26 President Alok Sharma confirmed the need for businesses to adapt to a green economy:

*“We need business, we need investors driving companies, sectors, and the entire global economy towards its clean, green future.”<sup>84</sup>*

The UK government has put in place numerous financial incentives for companies to move towards climate-positive businesses, such as investing £99 million in innovative technology regarding resource and waste management<sup>85</sup>. To support this transition away from a purely economic focus there is a need for appropriate finance that includes business support. There is a need for more holistic measures of business success beyond economic indicators when assessing options for public sector support.

In order to recognise the benefits of a wellbeing economy<sup>86</sup>, there is a need to diversify support:

offering incentives that favour companies with a focus on reuse, repair, and extended responsibility, recognition of businesses who support their workers joining trade unions, as well as those who show how green jobs can be created, while also meeting high standards of working conditions (e.g. by providing Living Wage jobs and jobs in marginalised communities across the UK's four nations and for at risk groups of women).<sup>87</sup>

# CONCLUSIONS

Post-pandemic there is a real opportunity to rebuild with a cleaner and fairer fashion industry in line with the government's levelling up and "build back better" agendas. These ambitions are also in line with not just the UK government's, but the global recognition of the desire to increase the opportunities for green jobs in the transition to net zero. There is an exciting opportunity for the UK to be a world leader in aligning sustainability and ethical commitments.

This report recommends that the UK government needs to streamline its civil service approach to working with the fashion industry, invest in environmental infrastructure and implement and introduce the EPR policy as well as expediting the changes to the MSA which are so clearly needed by the industry, as noted by our evidence givers. Further to this, if a focus on levelling up and just transition is going to be made, investment in skills building as well as nurturing and supporting business through this transition is necessary.

It was also evident that whilst governmental enforcement of legislation is key to improving the impacts of the industry and overdue in the case of the Uyghurs, businesses need to take responsibility for the workers in their global and national supply chains. Failure to pay already low-paid workers during the pandemic by some brands has revealed with greater focus than ever before the propensity of these businesses to profit at the expense of garment workers.

While it is unlikely that we will see UK manufacturing numbers ever return to those of the 1980s<sup>88</sup>, with 1 million in the fashion production workforce, there is no reason to imagine that without the right R&D investment and nationwide commitment, the government could not seize the consumer's increasing desire to buy more sustainably and brands' growing ambitions to source more locally. This is an opportunity for businesses to really thrive once again within the UK market and among our global partners and competitors.

These recommendations will require enforcement, increased resources and innovative policies, alongside a rigorous overhaul of fashion business models and operations. From the evidence the APPG received, combined with further research, the link between reaching global environmental goals and protecting workers rights can no longer be treated in isolation to one another. It requires a holistic review and overhaul and long-term solutions orientated sustainable strategy. If implemented, the recommendations within this paper would support those vitally imperative next steps.

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The ESF APPG received over 110 submissions to this inquiry, ranging from industry leaders to consumers, through an industry survey and written evidence. It also heard oral evidence from: Basic Premier, Labour Behind the Label, Anti-Slavery International, University of Leeds, Demin Expert Ltd, Traidcraft, King's College London, University of Leicester, Corporate Justice Coalition (previously CORE), the UK Anti-Slavery Commissioner Dame Sara Thornton, First Mile, The Ethical Fashion

Initiative, University of Manchester, Dublin City University, Awaj Foundation, Human Trafficking Foundation, Centre for Social Justice, ASOS, TRAIID, University of Nottingham's Rights Lab, HURR Collective, Birdsong, Fashion Enter, Compare Ethics, Make It British, Protection Approaches, Uyghur Human Rights Project, IndustriALL Global Union, Worker Rights Consortium, World Uyghur Congress as well as several academics and experts. This report makes specific and direct reference to

research carried out to investigate the aims, values and working practices of fashion micro and small (MSE) businesses embedding sustainability within their enterprises. We engage on a regular basis with governmental departments, including the Department for Business, Energy and Industrial Strategy (BEIS), the Department for Environment, Food and Rural Affairs (DEFRA) and the Home Office on sustainability, business opportunities and labour exploitation in the fashion industry.



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