WHAT FUELS FASHION?

A special edition of the Global Fashion Transparency Index ranking 250 of the world's largest fashion brands on decarbonisation and related disclosure.

2024 EDITION

FASHION REVOLUTION

What Fuels Fashion? is a special edition, single-issue report of the Global Fashion Transparency Index. This report ranks 250 of the world's largest fashion brands on disclosure of their climate and energy-related policies, practices and impacts in their own operations and supply chains.

The research is broken down into five key themes:

Accountability

Decarbonisation

Energy Procurement

Financing Decarbonisation

Just Transition and Advocacy

FOREWORD

REFUGEE CAMP AS A CHILD

© UNHCR/SAMUEL OTIENO

MY LIFE DEPENDS ON THE RAIN

MALISH GODFREY

My name is Malish Godfrey, and I am from the Yamgbara tribe of South Sudan in Central Equatoria. My life has been marked by displacement since 1992, when civil war forced my family to flee to Uganda. We lived as refugees in Imvepi refugee camp. When peace agreements were signed in 2005, it allowed us to return home to South Sudan in 2008. My mother, sister, and I hoped for a new beginning, but the realities of our region's ongoing struggles with internal conflicts and drought made that difficult.

At the refugee camp in Uganda, my mother, who was not formally educated, used to do embroidery. She acquired the skills from her mother and as a refugee she had little or no means to work aside from her embroidery. The income earned from embroidery kept us going. It would pay people to grow crops for us, buy our food, our clothes and materials for school.

In 2016, I began working with an organisation called the Roots Project, a social enterprise based in Juba and a partner of MADE51, the UN Refugee Agency's global brand for refugee-made artisanal products. Women working with Roots create beautiful beadwork used as jewellery, accessories and home decor. The organisation works with over 150 women from 22 different South Sudanese tribes and refugees from Ethiopia and Sudan who have formed a sisterhood group of love and psychosocial support over years of working together.

Violence and insecurity are the primary reasons for displacement for the women at Roots. However, the impact of the climate crisis has compounded their hardships. Food insecurity and food aid shortages are exacerbated by climate-induced flooding, making survival even more challenging. Hear directly from the Roots' artisans on page 86.

My life depends on the rain – and this is true for so many of us in this region. Most livelihoods here are tied to the predictable patterns of the seasons. We need to know when the rain will come and when it will stop. Unfortunately, the cycles of drought, heat and heavy rain that cause floods have become increasingly unpredictable and severe, causing hunger, diseases and further displacement. Maize, our staple food, becomes scarce when farmers cannot harvest it, forcing us to import it at a high cost. We would be more food secure if we could grow our own food year in, year out. To compound this, in a hunger crisis, animals often destroy farmers' cash crops, leaving us with even less.

The climate crisis not only affects farmers. Last year, Roots' artisans worked on a large order for an international brand, which became incredibly stressful as the rains changed. The delayed rains meant the expected cultivation period was disrupted, and then severe rains caused flooding. Artisans then had to balance the need to harvest the crops they had grown to feed their families with their beading work so that we could fulfil the order on time and meet production deadlines. The fear of failing to deliver the order on time weighed heavily on us all and was stressful to navigate.

> "The cycles of drought, heat and heavy rain that cause floods have become increasingly unpredictable and severe, causing hunger, diseases and further displacement.

This is why I support Fashion Revolution's calls in this report for brands to provide financial compensation for supply chain workers affected by climate hazards like flooding. This report reveals that just 3% of major fashion brands disclose their efforts to financially compensate workers affected by the impacts of the climate crisis, including loss and damage. This needs to increase to safeguard workers in the supply chain who are most affected by the climate crisis.

Through this foreword, I hope to convey the challenges those of us on the frontlines of the climate crisis are dealing with. It is my hope that sharing my story will inspire others, including the major fashion brands in this report, to join us in taking action for a more stable and just world.

ABOUT FASHION REVOLUTION

Fashion Revolution works towards a vision of a fashion industry that conserves and restores the environment and values people over growth and profit. The Rana Plaza disaster in Bangladesh instigated the creation of Fashion Revolution and spurred millions to join our call for greater industry transparency and accountability in the fashion industry. Fashion Revolution has become the world's largest fashion activism movement, mobilising citizens, industry and policymakers through research, education and advocacy work.

The issues in the fashion industry never fall on any single person or brand. That's why we focus on using our voices to transform the entire system. With systemic and structural change, the fashion industry can lift millions of people out of poverty and provide decent and dignified livelihoods. It can conserve and restore our living planet. It can bring people together and be a great source of joy, creativity and expression for individuals and communities.

This report was researched and written by Fashion Revolution CIC.

www.fashionrevolution.org

LEAD AUTHORS AND RESEARCHERS

Liv Simpliciano
Maeve Galvin
Ciara Barry
Delphine Williot
Isabella Luglio
Ysabl Marie Dobles

Designed by Molly Porteous
Published in August 2024

FASHION REVOLUTION

CONTENTS

GLOSSARY

24/7 HOURLY MATCHING

24/7 hourly matching ensures every hour of electricity usage is paired with locally or regionally sourced carbon-free generation, precisely aligning consumption with renewable production to reduce emissions.

ADAPTATION

Adaptation involves adjusting practices, processes, and systems to reduce the adverse impacts of the climate crisis. For example, developing supply chains that are resilient to climate hazards, such as installing flood defences in a factory.

ANNUAL MATCHING

Annual matching involves aligning a company's yearly electricity use with renewable sources, but it may not fully decarbonise the grid due to timing mismatches between renewable availability and actual consumption, leading to lower emission reductions compared to hourly matching.

CARBON FOOTPRINT

This measures the total amount of carbon dioxide (CO2) emissions produced by an individual, organisation, or activity, typically through the burning of fossil fuels. It helps gauge the impact of these activities on climate change.

CLIMATE HAZARDS

Climate hazards are natural events in weather cycles. We've always had hurricanes, droughts and wildfires, flooding and high winds. However, we are currently witnessing a scale of destruction and devastation that is new and terrifying.

DEGROWTH

Degrowth challenges the paradigm of unlimited economic growth by advocating for a socially just and ecologically sustainable society. It promotes reducing global consumption and production, emphasising well-being over material accumulation and advocating for equitable distribution of resources.

ENERGY PROCUREMENT

The process of buying/sourcing energy from a supplier to meet the needs of an organisation.

JUST TRANSITION

A framework that ensures climate vulnerabilities are addressed without compromising human rights for workers and affected communities. Refer to the Just Transition section of the report for specific recommendations on enabling a Just Transition for workers and suppliers in fashion supply chains.

CARBON OFFSETTING

Carbon offsetting is when companies compensate for their carbon emissions by investing in external projects that reduce or sequester GHGs, such as reforestation or renewable energy. While it allows companies to claim 'carbon neutrality', it often does not address the emissions produced directly within their own operations and can be controversial due to issues like double-counting and the effectiveness of the projects.

POWER PURCHASE AGREEMENTS (PPA)

A Power Purchase Agreement (PPA) is a contract where a company buys electricity directly from a renewable energy producer, often facilitating the development of new renewable projects and expanding renewable capacity. PPAs are high-quality procurement tools, linking specific projects and locations to ensure additional renewable energy generation.

RENEWABLE ELECTRICITY

Renewable electricity is power generated from sustainable sources like wind, solar, and hydro, which naturally replenish and have minimal environmental impact.

RENEWABLE ENERGY

Renewable energy comes from natural sources that are replenished faster than they are consumed, like sunlight and wind. It produces significantly lower emissions than fossil fuels, making it essential for combating climate change. However, not all renewable sources are entirely green or clean if they generate some emissions or environmental harm.

RENEWABLE ENERGY CREDIT/CERTIFICATES

Certificates that brands can buy to claim they are using renewable electricity. They may also go by the name of Guarantees of Origin (GOs) and Energy Attribute Certificates (EACs).

UNBUNDLED ENERGY ATTRIBUTE CERTIFICATES (EACS)/ RENEWABLE ENERGY CERTIFICATES (REC)S

A 'bundled' REC (Renewable Energy Certificate) is sold together with the actual electricity produced from a renewable source. This means when you buy the electricity, you also get the certificate verifying that the electricity is renewable. One REC represents 1 MWh of renewable electricity.

An 'unbundled' REC is sold separately from the actual electricity. You can buy the certificate even if the electricity you are using comes from non-renewable sources. The certificate alone claims that a certain amount of renewable energy was generated somewhere, but it doesn't mean that the electricity you are consuming is directly from renewable sources.

MITIGATION

Mitigation refers to actions taken to reduce or prevent the emission of greenhouse gas. This can include measures like switching to renewable energy and improving energy efficiency.

SCOPE 1 EMISSIONS

Scope 1 emissions are direct greenhouse gas emissions from sources that are owned or controlled by an organisation, such as emissions from fuel combustion in company-owned vehicles and facilities.

SCOPE 2 EMISSIONS

Scope 2 emissions are indirect greenhouse gas emissions from the generation of purchased electricity, steam, heat, or cooling consumed by the organisation.

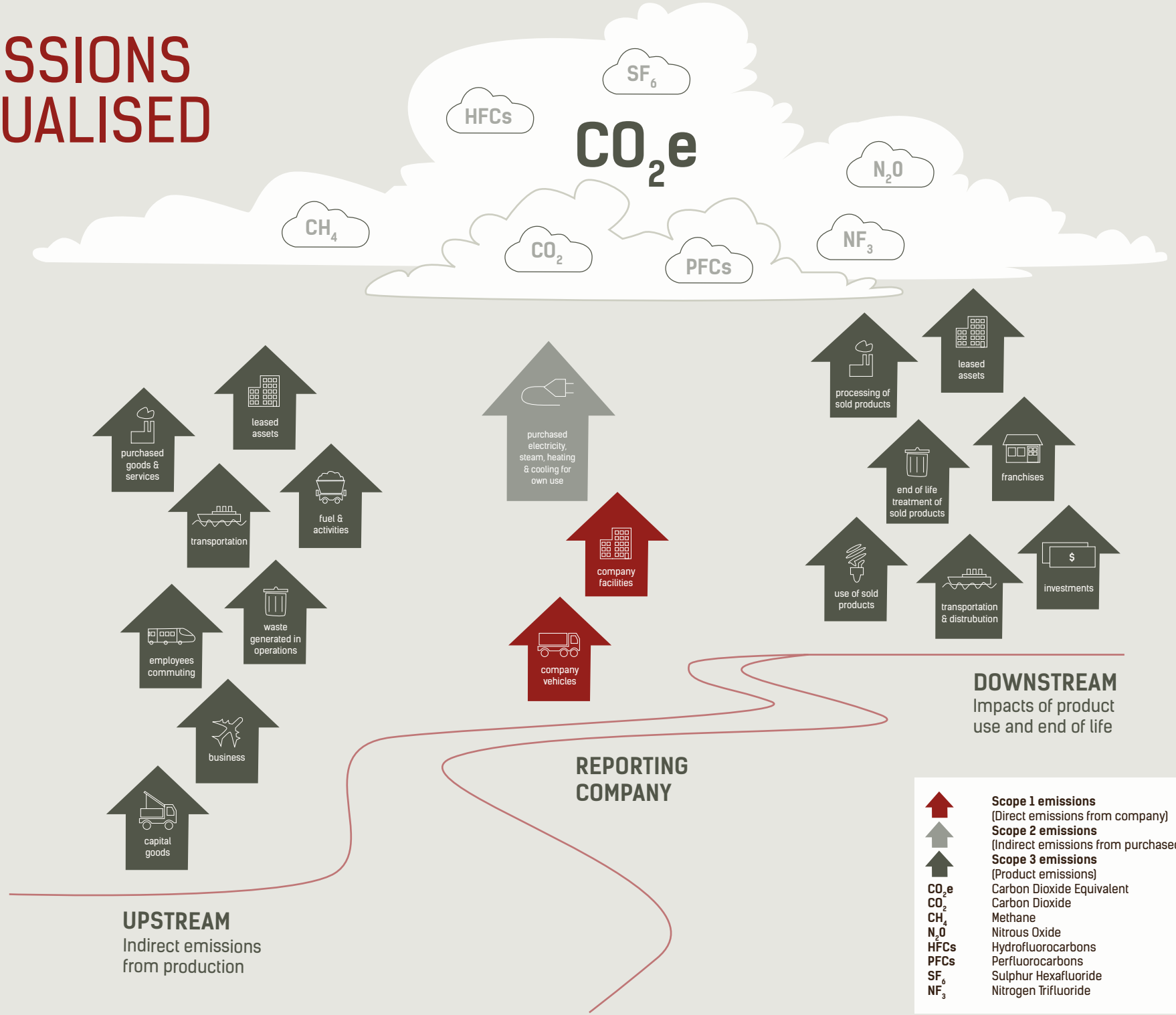
SCOPE 3 EMISSIONS

Scope 3 emissions are all other indirect greenhouse gas emissions that occur in the value chain of the organisation, including both upstream (related to purchased goods and services) and downstream (related to sold goods and services) emissions.

SELF-GENERATION

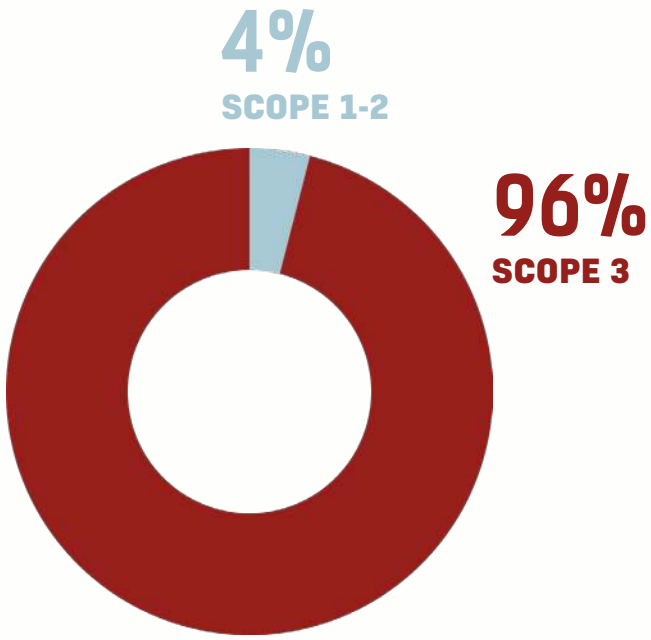
Producing renewable energy on-site rather than purchasing it from external suppliers. It can take the form of solar panels and wind turbines.

EMISSIONS VISUALISED



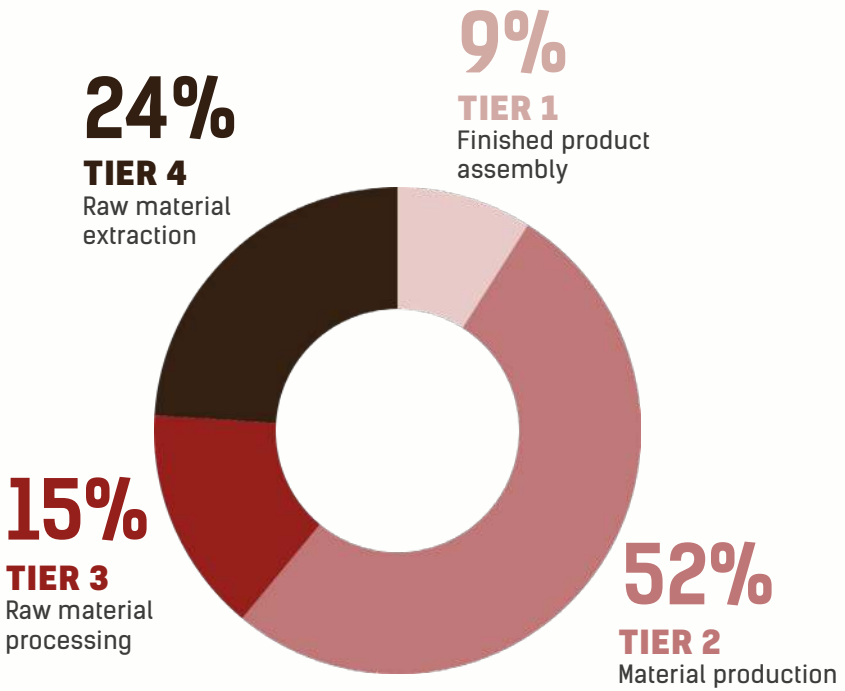
EMISSIONS VISUALISED

SUPPLY CHAIN EMISSIONS SPLIT



For apparel brands, scope 1 emissions (with Science Based Targets) typically account for 1% of their total emissions, while scope 3 represents around 96%.

SCOPE 3 EMISSIONS SPLIT



Note: Averages taken from Apparel Impact Institutes Annual Impact Report 2023

EXECUTIVE SUMMARY

INTRODUCTION

The climate crisis is an existential threat to our planet and everyone living on it. It is the defining crisis of our time. Extreme weather events – from hurricanes and wildfires to heatwaves, floods and droughts – are becoming more frequent and more intense. The climate crisis threatens our food and water security, disrupts entire ecosystems, and pushes species towards extinction. The science is clear: we must halve emissions by 2030 across all industries to limit global warming below 1.5°C above pre-industrial levels. Rising temperatures are not simply the warming of our atmosphere by a few degrees – it's the loose thread on the sweater. What we all stand to lose is 'nothing less than all we love and all we are'. Heating above 2.0°C could push our planet into a 'hothouse state'; unravelling into a cascade of crises that will unfairly impact the most vulnerable. Climate breakdown is a process of atmospheric colonisation. These communities, predominantly in the Global South, have contributed least to climate emissions, and are most affected by the catastrophic impacts of the climate crisis whilst the Global North continues to pollute for its own enrichment.

The fashion industry alone is set to overshoot the 1.5°C limit by 50%; doubling emissions rather than halving them as the science is crying out for.

To confront the climate crisis, we need to look at the main cause – fossil fuels. Fashion is one of the most polluting industries on the planet. Our clothes are fuelling the climate crisis, and the people who make them are paying the price. The industry relies on fossil fuels at every stage – from synthetic fibres to the energy used to dye our clothes and to power the factories making them.

But there are solutions. By transitioning to renewable energy sources like solar and wind power, fashion brands can significantly reduce their carbon footprint and lead the way towards a more sustainable industry. This shift isn't just about protecting the environment; it's about ensuring a safer and more equitable future for everyone, especially those most vulnerable to the impacts of the climate crisis.

Significant progress in reducing greenhouse gas emissions in the fashion industry can be achieved by focusing on several key areas:

1. Transitioning the supply chain from coal and fossil fuels to renewable energy
2. Producing fewer clothes
3. Minimising the use of air freight
4. Phasing out the use of synthetic materials derived from fossil fuels

In this report, we emphasise the first issue: the energy transition within the supply chain, with a particular focus on phasing out coal at the production facility level.

This report demands an end to the top-down, colonial dynamics that have plagued the fashion industry for decades. Justice and respect for impacted communities must be at the forefront of the shift to cleaner, renewable production. Brands must acknowledge their responsibility to the people who make their products and ensure the transition is a Just Transition. This is the bare minimum that major fashion brands and retailers – who have built their massive wealth by exploiting people and the planet – can do.

> This report calls on major fashion brands to invest at least 2% of their annual revenue on a fair transition away from fossil fuels

With the publication of this report, big fashion can no longer mask its lack of decarbonisation progress with vague, insufficient targets and pilot projects that fail to benefit most of the supply chain. The need for absolute systemic change is undeniable.

That's why we are asking big fashion to put their money where their emissions are. This report calls on major fashion brands to invest at least 2% of their annual revenue on a fair transition away from fossil fuels – like coal – to renewable energy sources – like wind and solar – to power fashion's supply chain in a clean way.

This isn't a question of feasibility; it's a matter of willpower.

Another future, a clean and just transition for renewable energy in fashion supply chains, is possible. We simply need urgent collective action alongside industry and political will.

KEY FINDINGS

While more major fashion brands and retailers are disclosing emissions reduction targets, scope 3 emissions are *still* increasing.

Nearly half (47%) of major fashion brands and retailers are now disclosing emissions reduction targets verified by the Science Based Targets Initiative (SBTi) – up 13 percentage points from last year's 34%. Of the nearly half (117 out of 250 brands) with decarbonisation targets, only 105 disclose their progress. Among them, 56 report emissions reductions. Progress is overshadowed, however, by the seven brands reporting increases in scopes 1 and 2 emissions and a concerning 42 brands reporting increases in scope 3 emissions against their baseline year, the most critical area to decarbonise.

Nearly one quarter (24%) of the world's largest fashion brands disclose nothing on decarbonisation – signifying that the climate crisis is not a priority for them.

Sixty brands score 0% in the decarbonisation section. Amid record-breaking heat waves, it's alarming to see that the industry's emissions are rising alongside one quarter of brands reviewed disclosing no information about their decarbonisation efforts. This lack of transparency is actively harmful as it impedes collective action toward achieving climate targets. Underlining this is the finding that just four out of 250 major brands (ASICS, H&M, Marks & Spencer, and Patagonia) disclose emissions reduction targets that meet the level of ambition called for by the United Nations, which is a 55% absolute emissions reduction by 2030 from 2018 levels. Most troubling, however, is that 58% of brands reviewed show no clear progress on their climate targets – if they disclose them at all. This means that more than half of brands reviewed either lack an SBTi-approved target, do not disclose progress, or fail to disclose any decarbonisation efforts at all. The findings send a clear message: major fashion brands are evading accountability for their emissions, indicating that the climate crisis is not a priority for them.

Climate scientists are calling for an urgent phase-out of coal but big fashion is not delivering: 86% of brands lack a public, time-bound and measurable coal phase-out target.

It will not be possible for fashion brands to meet climate targets without publicly available, clear and credible strategies towards achieving them. This includes phasing-out fossil fuels, adopting renewable energy and electricity across their supply chains. Coal is burnt in factories to heat the water used in dyeing and printing the fabrics that make our clothes, contributing significantly to CO2 and other greenhouse gas (GHG) emissions. Without widespread commitment to coal phase-out, it will not be possible to meet overall progress toward global climate targets – and it is clear the industry is lagging with just 14% of brands disclosing a public, time-bound and measurable target.

What's more, the majority of the industry does not disclose a renewable energy target or renewable electricity target for their supply chains (94% and 92% of brands do not disclose this, respectively). A renewable electricity target without a renewable energy target means that only the electricity used by the company is being sourced from renewable resources, while other energy forms such as heating, cooling, and transportation fuels may still rely on fossil fuels. **In other words, 100% renewable electricity does not mean 100% fossil fuel free.**

Setting clear targets is essential for driving accountability and ensuring progress towards reducing the industry's environmental impact but for the majority of big fashion, these targets are not publicly disclosed or do not exist at all. The absence of credible targets is like navigating a storm without a compass.

We don't know what fuels fashion because the vast majority – 95% of major fashion brands and retailers – are not upfront about what fuel is used in their supply chains.

Most fashion brands (95%) do not publish a country-by-country breakdown of the energy mix in their supply chains. This is underscored by the fact that a significant majority (77%) of big fashion brands are not transparent about how they define renewable energy. Much like it is important to understand how brands define what they mean by 'sustainable material' – it is important to also have transparency on what constitutes renewable energy to understand the robustness of brands' efforts and progress toward renewable energy adoption. The lack of transparency in how brands define renewable energy casts doubt on the credibility of their transition plans.

Full supply chain traceability is necessary to accurately map the industry's carbon emissions globally, but just 52% of brands disclose their first-tier factory lists and even fewer publish their processing facilities.

Climate accountability begins with transparency. Our research finds that of the 47% of major brands and retailers who disclose an SBTi-verified decarbonisation target that covers scopes 1 to 3, 13% do not disclose their supplier lists. This discrepancy raises a critical question: how can fashion brands be accountable for their climate targets when they don't even disclose where their clothes are made?

Not disclosing this information directly hampers collective action on decarbonisation. Most garment-producing countries struggle to decarbonise and rely on fossil fuels. Therefore, brands must disclose their sourcing locations, as they contribute to these countries' emissions and must be held accountable. If there is no transparency, there is no credible visibility into whether and how the brand is addressing suppliers' needs regarding climate decarbonisation, mitigation, and adaptation. The climate crisis clock is ticking and we cannot afford to waste time determining chains of responsibility.

Despite evidence showing that clothing production is excessive, the fashion industry is avoiding accountability by failing to disclose how many clothes they make and the emissions generated in the process.

The industry is producing at staggering volumes, with global consumption projected to increase 63% by 2030 and clothing sales potentially reaching 160 million tonnes by 2050—over three times today's amount. Most brands (89%) do not disclose the number of clothes they make each year. Nearly half of the brands reviewed (45%) disclose neither their production volumes nor their raw material carbon footprint. This is important because it means that nearly half of big fashion brands are (1) not telling us how much they are making and (2) how many emissions are generated in the process of making our clothes – that often end up being discarded after only a few wears. These emissions are particularly concerning at the raw material level, fibre extract and processing involves fossil fuels at various stages of their production processes. This includes farming operations, transportation, and processing activities such as cleaning, dyeing, and finishing the fibres – contributing significantly to the industry's overall footprint. This is highlighted by the fact that the textile sector was the third largest source of water degradation and land use in 2020. By failing to disclose the emissions generated during the extraction and processing of fibres for clothing, the fashion industry is essentially having its cake and eating it too, skirting accountability while continuing to contribute significantly to environmental harms linked to production.

So-called ‘sustainable’ clothes may still be produced using fossil fuels.

The fashion industry’s climate impact has largely been scrutinised through the lens of the materials used in our clothes rather than the manufacturing processes behind them. While 58% of brands disclose sustainable material targets, only 11% reveal their supply chain’s energy sources, meaning ‘sustainable’ clothes might still be made in factories powered by fossil fuels.

Few brands are using their significant influence to push for legislation supporting the just, clean energy transition.

Big fashion brands hold significant purchasing power, which can influence policymakers and governmental policies within the supply chain countries they source from – particularly in countries such as Bangladesh where garment production makes up a significant proportion of GDP. This represents an opportunity to advance a clean energy transition in garment-producing countries – but the vast majority of brands are failing to disclose evidence of utilising this leverage.

Only 13% of brands disclosed evidence of past and current renewable energy advocacy in their supply chains and only 2% disclosed the outcomes of these advocacy efforts. Given the urgency to transition to renewable energy in garment-producing countries, a surge of legislation potentially penalising them to export their goods and numerous governments cracking down on trade unions and garment workers, brands have a responsibility to advocate for a just, clean energy transition to policymakers worldwide.

Workers are increasingly losing their livelihoods due to climate hazards – but they are not being compensated.

A mere 3% of brands – that's just seven brands – disclose efforts to financially compensate workers affected by the impacts of the climate crisis. This is particularly stark given the weakness of social protection schemes in most garment production countries and the fact that garment workers, most of whom are paid poverty wages, already incur high debt levels. Given the regularity of climate hazards hitting the industry and affecting workers' livelihoods, there is a clear need for brands, the most profiting stakeholder in the supply chain, to step up and provide compensation mechanisms – not out of charity, but justice.

Fashion executives are still incentivised to deliver shareholder value above all else – including decarbonisation.

Meaningful incentives for executives to reduce carbon emissions signal a genuine commitment from the brand to decarbonise. However, our findings show that just 18% of major brands and retailers disclose this information – highlighting the need for better alignment between accountability, executive incentives and achieving decarbonisation targets. Even fewer (11%) disclose the percentage of executive bonus or pay tied to these targets.

In 2023, the highest-paid CEOs primarily received their compensation through stock and option awards. This means that their income is closely tied to the performance of their company's stock. In other words – if the stock value goes up, their compensation increases, inextricably linking their financial interests with the company's success and shareholders' gains.

Despite the urgency of the climate crisis, it is clear that just a minority of executive bonuses are explicitly tied to the achievement of absolute carbon reduction – the most pressing issue at hand to mitigate this global challenge. This raises a critical question: when will fashion executives be truly held accountable for prioritising their commitment to decarbonisation over maximising profits for shareholders?

Polluter pays: Big fashion brands must put their money where their emissions are.

Major fashion brands that contribute the most towards fashion's climate emissions should bear the greatest financial responsibility for the industry's transition to renewable energy. The fact that 94% of major fashion brands disclose no information about their investments in renewable energy within their supply chains is an appalling and dangerous indictment of corporate impunity in the fashion industry.

Just 6% of major fashion brands disclose how much they invest in renewable energy in their supply chain. Even fewer, just 4%, disclose the scale of support provided. Those 6% of brands disclose efforts including their contributions to joint climate funds like Apparel Impact Institute's (Aii) Fashion Climate Fund and Fashion Pact's Future Supplier Initiative. Typically, these funds provide suppliers with loans at favourable rates to invest in costly infrastructure like solar panels. But suppliers, who already operate on thin margins, need brand funding, not debts. Burdening suppliers with debt to meet brands' climate targets is not a fair solution.

Debt-based financing exacerbates the longstanding power imbalances between fashion brands and the suppliers and workers who make their clothes. These imbalances have been the bedrock of persistent labour rights issues in fashion supply chains, such as poverty wages.

Stable, long-term purchasing practices are crucial for decarbonising fashion.

Focusing solely on short-term brand profits is incompatible with decarbonising fashion's supply chains, yet this remains the industry norm. Establishing long-term supplier relationships and making financial investments is essential for fashion brands to facilitate suppliers in driving the renewable energy transition. Major fashion brands that own part or all of their supply chain score higher in this research than those that do not. Similarly, market segments like sportswear and luxury, which require speciality suppliers that they stay with for longer periods of time, outperform other retailers in this research, too. The renewable energy transition in fashion depends on systems change which values leverage and collective brand action, responsible purchasing practices and long-term, stable supply chains. This systems change is essential not only for climate action but also for addressing other persistent issues in fashion's supply chains.

ROLES & AIMS OF THE REPORT

INTRODUCTION

What Fuels Fashion? aims to:

- Respond to the urgent need to mitigate the worst impacts of the climate crisis.
- Place a spotlight on the world's largest and most influential fashion brands, analysing trends and comparing transparency levels in their decarbonisation efforts.
- Incentivise major fashion brands and retailers to disclose more detailed and comparable data on the decarbonisation targets and strategies.
- Provide a vital tool for stakeholders to understand the disclosed data enabling informed actions against the climate emergency.
- Raise public awareness and educate on the pressing social and environmental challenges in the global fashion industry, using this research to drive activism and collective mobilisation in the face of the climate crisis.
- Drive scrutiny, accountability and positive change on decarbonisation among the world's largest fashion brands.

Fashion Revolution began transparency research seven years ago, and the persistent and alarming lack of transparency on climate highlights the critical need for our unwavering focus on decarbonisation. The need for greater transparency and primary data has never been more acute – nor has the imperative to protect both the workers and communities along fashion's supply chains, who are on the front lines of the climate crisis.

Despite the urgency of the climate crisis, much of the global fashion industry remains shrouded in secrecy, concealing abuses and hindering progress. Transparency empowers individuals, activists, experts, worker representatives, environmental groups, policymakers, investors, and even brands to scrutinise, hold accountable, and drive positive change in the industry. Transparency is a first step; it is not radical, but it is necessary. Transparency is not to be confused with sustainability. However, without transparency, achieving a sustainable, accountable and fair fashion industry will be impossible.

HOW TO UNDERSTAND THE DATA

This is a special edition report. Much of the data is not comparable year-on-year – but where it is, it is stated. All percentages shared in relation to the findings, unless otherwise specified, are meant to be perceived out of 250 brands reviewed.

As an example, in 2023, 34% of brands reviewed disclosed a time-bound and measurable commitment to decarbonisation whereas less, 32% of brands, disclosed progress against their decarbonisation targets. This indicates that fewer brands report on their progress than those who state they have such targets. It does not mean that of the 34% of brands who have a decarbonisation target, 32% of them disclose progress against their target.

THE SCOPE OF OUR RESEARCH

What Fuels Fashion? reviews and ranks 250 of the world's largest and most influential fashion brands and retailers based on the following criteria:

- **Annual turnover**: Over USD $400 million*
- **Market segments**: Includes high street, luxury, sportswear, accessories, footwear, and denim
- **Geographic spread**: Represents brands from Europe, North America, South America, Asia, and Africa

We have deliberately chosen to focus on transparency by means of public disclosure. If information and data disclosed by brands is publicly available, detailed and specific enough, it can be used by multiple stakeholders – including worker representatives, environmental groups, investors, consumers and brands themselves – to drive positive change on human rights and environmental issues. This is what we are looking for and what this research incentivises major brands to do.

Limited and inward-facing disclosure limits the scope for transformative impact. Public disclosure drives public accountability. For this reason, **What Fuels Fashion?** purposely excludes information which is not in the public domain.

Transparency ≠ Ethics and Sustainability

What Fuels Fashion? does not measure ethics or sustainability. A brand can score highly on transparency of their decarbonisation efforts, but this does not mean they are ethical or sustainable.

We do not endorse any brand in the research or suggest that consumers shop at specific brands based on their ranking. This is not a shopping guide.

*__Note__: For privately held brands, turnover estimations are based on publicly available information.

Public self-disclosure

What Fuels Fashion? evaluates what brands publicly self-disclose about their decarbonisation efforts in their operations and supply chain.

Verification of Claims

Points are awarded only for publicly disclosed information/data on major brands' policies, procedures, performance, and progress on decarbonisation efforts across the value chain.

Up-to-date information

Most of our research indicators are time-sensitive, and we only consider disclosure that has been published January 2022 or later.

Public self-disclosure

What Fuels Fashion? does not measure a brand's decarbonisation impacts; it measures public disclosure.

Verification of Claims

Verification of claims made by brands and retailers is beyond the scope of this research. However, stakeholders are encouraged to use our research to hold brands accountable for their claims.

Up-to-date information

This does not apply to disclosure that is not time-sensitive (e.g. we will allow relevant policies and commitments published before this date if they still apply and are publicly disclosed).

Accepted Sources for Public Disclosure

We award points only for information/data that has been publicly disclosed on the brand or parent company's own website (or directly linked to it).

We review information which is publicly available from one of the following places:

- On the brand or parent company's website
- Sustainability microsites (provided there is a direct web link to it from the main brand or parent company website)
- In annual reports or annual sustainability reports published on the brand or parent company website
- In any other documents which are publicly available and can be downloaded freely from the brands' or parent company's websites
- Via external, third-party websites, but only when there is a direct web link from the brand or parent company's website to the third-party website where specific disclosures can be found

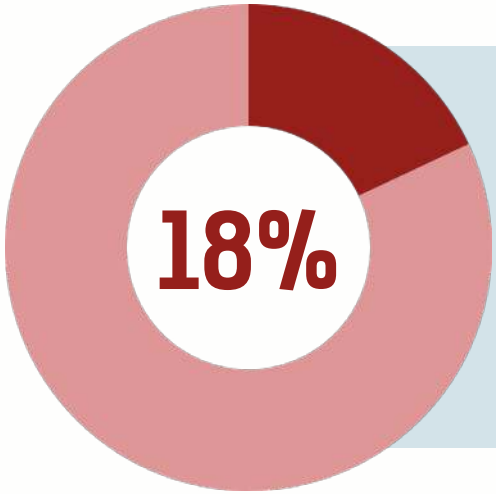
We do not count the following information sources:

- A third-party website or document where there is no web link from the brand's own website, including press articles
- Clothing labels and hang tags on products
- In-store or other physical locations
- Smartphone apps
- Social media channels
- Information provided to us by a fashion brand that cannot be found on the brand's website

KEY FINDINGS

KEY RESULTS

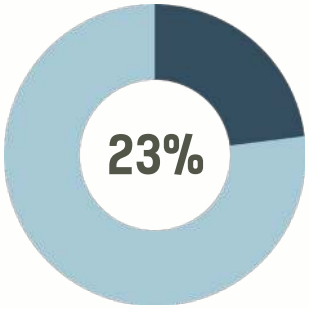
AVERAGE SCORES



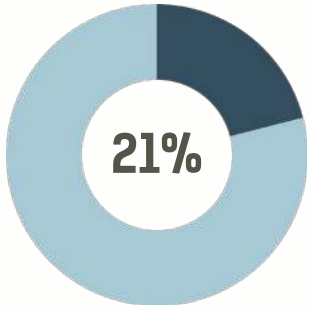
Overall average score across the 250 brands reviewed in 2024

BY SECTION

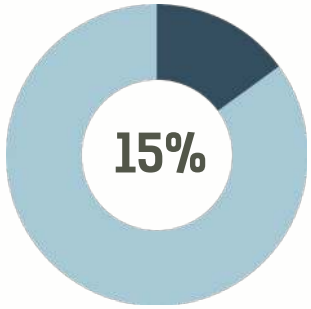
ACCOUNTABILITY



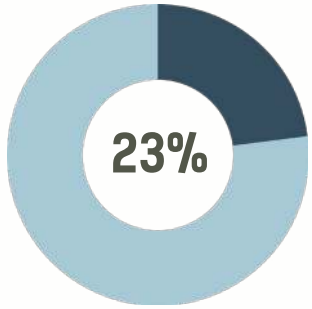
DECARBONISATION



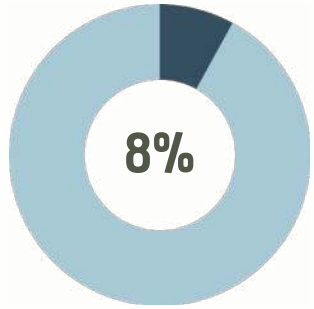
ENERGY PROCUREMENT



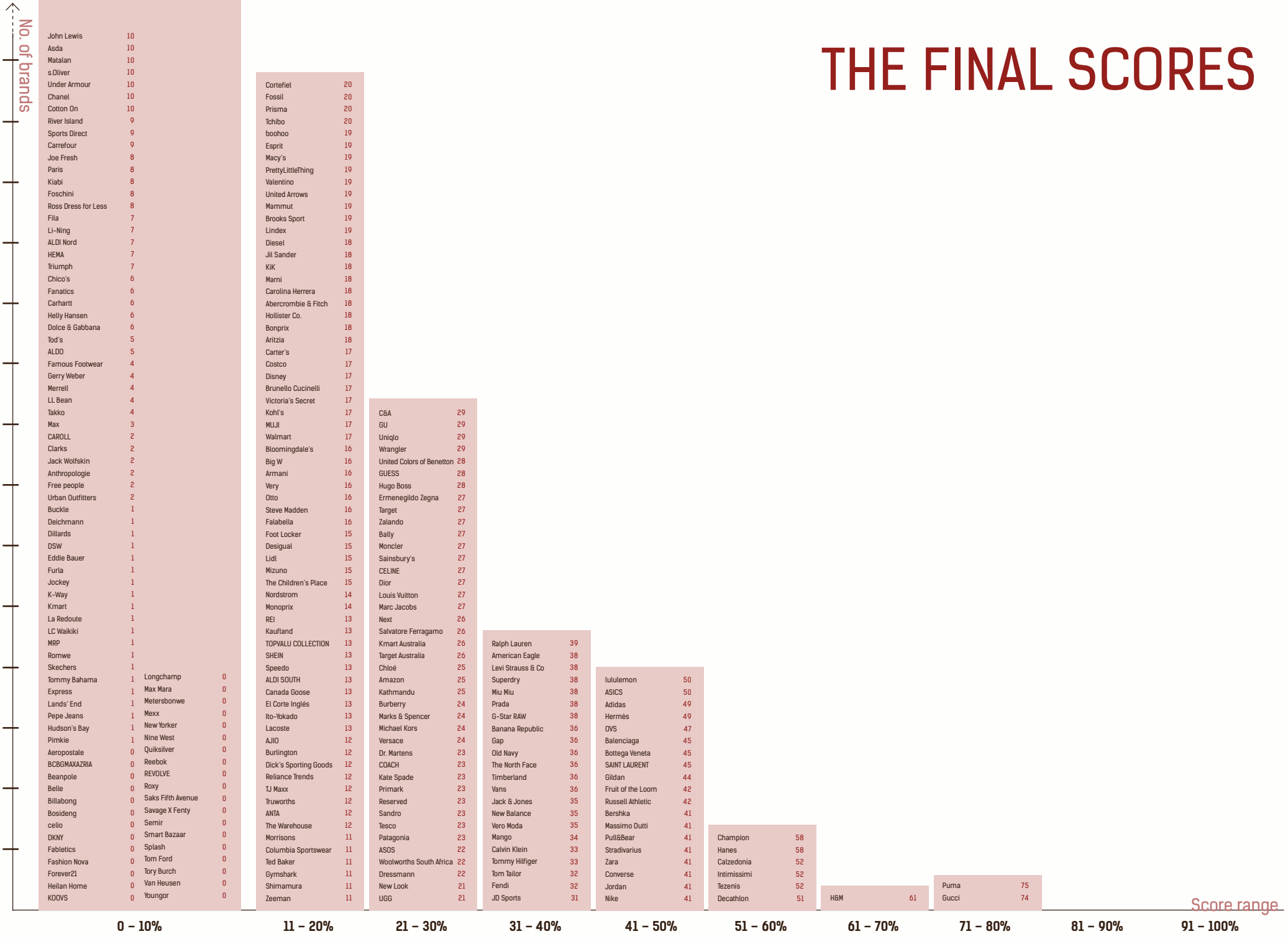
FINANCING DECARBONISATION



JUST TRANSITION & ADVOCACY



THE FINAL SCORES



0 – 10%			
John Lewis	10	Longchamp	0
Asda	10	Max Mara	0
Matalan	10	Metersbonwe	0
s.Oliver	10	Mexx	0
Under Armour	10	New Yorker	0
Chanel	10	Nine West	0
Cotton On	10	Quiksilver	0
River Island	9	Reebok	0
Sports Direct	9	REVOLVE	0
Carrefour	9	Roxy	0
Joe Fresh	8	Saks Fifth Avenue	0
Paris	8	Savage X Fenty	0
Kiabi	8	Semir	0
Foschini	8	Smart Bazaar	0
Ross Dress for Less	8	Splash	0
Fila	7	Tom Ford	0
Li-Ning	7	Tory Burch	0
ALDI Nord	7	Van Heusen	0
HEMA	7	Youngor	0
Triumph	7		
Chico's	6		
Fanatics	6		
Carhartt	6		
Helly Hansen	6		
Dolce & Gabbana	6		
Tod's	5		
ALDO	5		
Famous Footwear	4		
Gerry Weber	4		
Merrell	4		
LL Bean	4		
Takko	4		
Max	3		
CAROLL	2		
Clarks	2		
Jack Wolfskin	2		
Anthropologie	2		
Free people	2		
Urban Outfitters	2		
Buckle	1		
Deichmann	1		
Dillards	1		
DSW	1		
Eddie Bauer	1		
Furla	1		
Jockey	1		
K-Way	1		
Kmart	1		
La Redoute	1		
LC Waikiki	1		
MRP	1		
Romwe	1		
Skechers	1		
Tommy Bahama	1		
Express	1		
Lands' End	1		
Pepe Jeans	1		
Hudson's Bay	1		
Pimkie	1		
Aeropostale	0		
BCBGMAXAZRIA	0		
Beanpole	0		
Belle	0		
Billabong	0		
Bosideng	0		
celio	0		
DKNY	0		
Fabletics	0		
Fashion Nova	0		
Forever21	0		
Heilan Home	0		
KOOVS	0		

11 – 20%	
Cortefiel	20
Fossil	20
Prisma	20
Tchibo	20
boohoo	19
Esprit	19
Macy's	19
PrettyLittleThing	19
Valentino	19
United Arrows	19
Mammut	19
Brooks Sport	19
Lindex	19
Diesel	18
Jil Sander	18
KiK	18
Marni	18
Carolina Herrera	18
Abercrombie & Fitch	18
Hollister Co.	18
Bonprix	18
Aritzia	18
Carter's	17
Costco	17
Disney	17
Brunello Cucinelli	17
Victoria's Secret	17
Kohl's	17
MUJI	17
Walmart	17
Bloomingdale's	16
Big W	16
Armani	16
Very	16
Otto	16
Steve Madden	16
Falabella	16
Foot Locker	15
Desigual	15
Lidl	15
Mizuno	15
The Children's Place	15
Nordstrom	14
Monoprix	14
REI	13
Kaufland	13
TOPVALU COLLECTION	13
SHEIN	13
Speedo	13
ALDI SOUTH	13
Canada Goose	13
El Corte Inglés	13
Ito-Yokado	13
Lacoste	13
AJIO	12
Burlington	12
Dick's Sporting Goods	12
Reliance Trends	12
TJ Maxx	12
Truworths	12
ANTA	12
The Warehouse	12
Morrisons	11
Columbia Sportswear	11
Ted Baker	11
Gymshark	11
Shimamura	11
Zeeman	11

21 – 30%	
C&A	29
GU	29
Uniqlo	29
Wrangler	29
United Colors of Benetton	28
GUESS	28
Hugo Boss	28
Ermenegildo Zegna	27
Target	27
Zalando	27
Bally	27
Moncler	27
Sainsbury's	27
CELINE	27
Dior	27
Louis Vuitton	27
Marc Jacobs	27
Next	26
Salvatore Ferragamo	26
Kmart Australia	26
Target Australia	26
Chloé	25
Amazon	25
Kathmandu	25
Burberry	24
Marks & Spencer	24
Michael Kors	24
Versace	24
Dr. Martens	23
COACH	23
Kate Spade	23
Primark	23
Reserved	23
Sandro	23
Tesco	23
Patagonia	23
ASOS	22
Woolworths South Africa	22
Dressmann	22
New Look	21
UGG	21

31 – 40%	
Ralph Lauren	39
American Eagle	38
Levi Strauss & Co	38
Superdry	38
Miu Miu	38
Prada	38
G-Star RAW	38
Banana Republic	36
Gap	36
Old Navy	36
The North Face	36
Timberland	36
Vans	36
Jack & Jones	35
New Balance	35
Vero Moda	35
Mango	34
Calvin Klein	33
Tommy Hilfiger	33
Tom Tailor	32
Fendi	32
JD Sports	31

41 – 50%	
lululemon	50
ASICS	50
Adidas	49
Hermès	49
OVS	47
Balenciaga	45
Bottega Veneta	45
SAINT LAURENT	45
Gildan	44
Fruit of the Loom	42
Russell Athletic	42
Bershka	41
Massimo Dutti	41
Pull&Bear	41
Stradivarius	41
Zara	41
Converse	41
Jordan	41
Nike	41

51 – 60%	
Champion	58
Hanes	58
Calzedonia	52
Intimissimi	52
Tezenis	52
Decathlon	51

61 – 70%	
H&M	61

71 – 80%	
Puma	75
Gucci	74

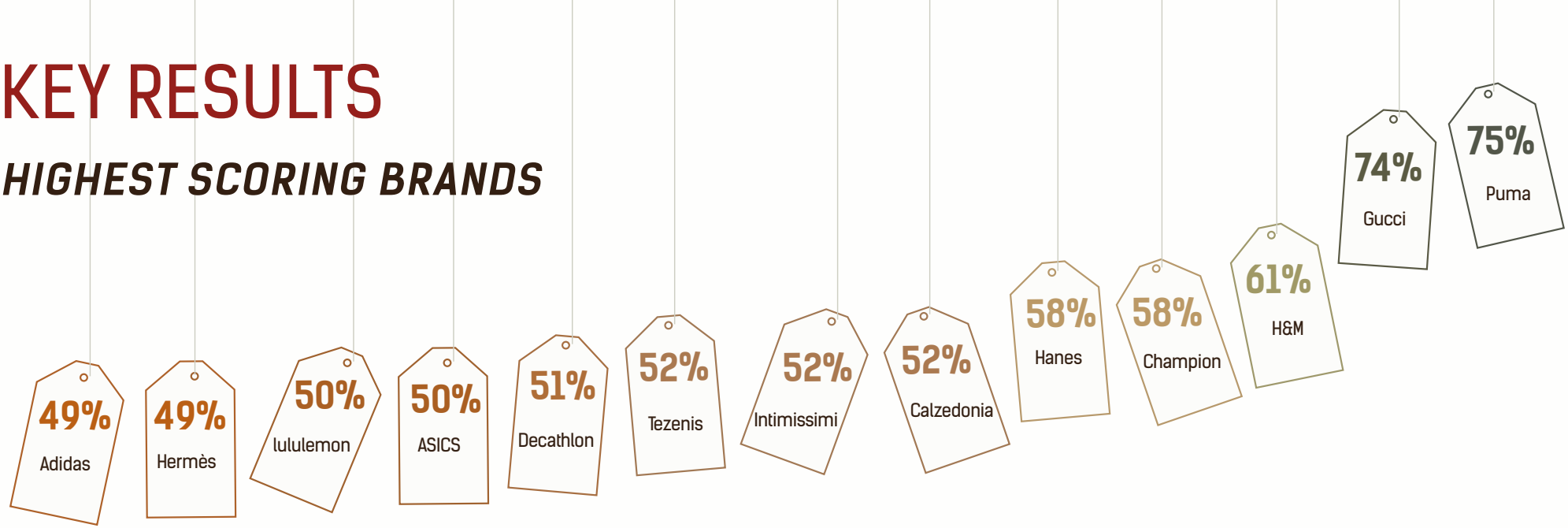
81 – 90%	

91 – 100%	

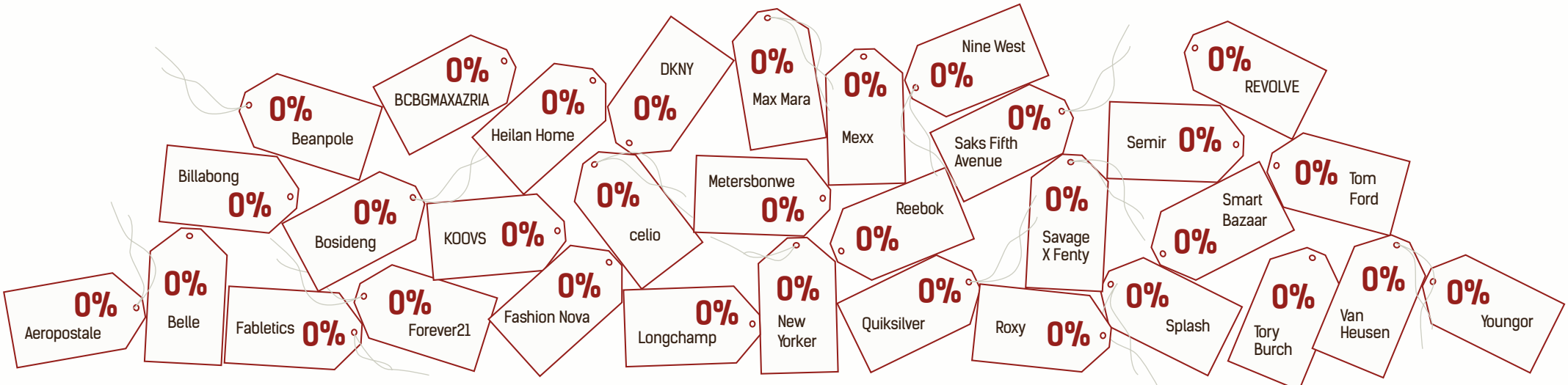
* Brands ranked in alphabetical order by score out of 250, shown as rounded-up percentage.

KEY RESULTS

HIGHEST SCORING BRANDS



LOWEST SCORING BRANDS



ACCOUNT-ABILITY

APPROACH

WHAT THIS SECTION COVERS

GOVERNANCE

In this subsection, we examine who in the company is accountable for the brand's climate performance and impacts. We check if brands publish information that links CEO and executive-level pay and incentives to achieving absolute carbon reduction across the entire value chain. We also look at the percentage of executive bonuses or pay tied to these reduction targets.

Additionally, we assess whether suppliers' incentives, such as long-term contracts, increased order sizes, price premiums, and reduced audits, are tied to decarbonisation improvements.

TRACEABILITY

This subsection focuses on whether brands are publishing supplier lists, focusing on the level of detail provided at three different levels:

1. **The factories** where clothes are made are often referred to as the first-tier or tier 1 manufacturers – in other words, the facilities with which brands have a direct relationship and typically do the cutting, sewing and final trims of products;
2. **The processing facilities** further down the supply chain – knitting, weaving and spinning mills, wet processing, embroidery, printing and finishing, dye-houses, tanneries and laundries;
3. **The suppliers of raw materials** – primary materials such as fibres, hides, rubbers, chemicals and metals.

We check whether brands are sharing the following information:

- Name of parent company
- Address of the facility
- Type of products/services supplied
- If the list is in machine-readable format (CSV, JSON, or XLSX)
- If the list is contributed to the Open Supply Hub platform

In this research, the methodology is more concise to focus on decarbonisation. Some indicators typically reviewed in the traceability section of the Global Fashion Transparency Index have been removed.

OVERPRODUCTION & MATERIALS

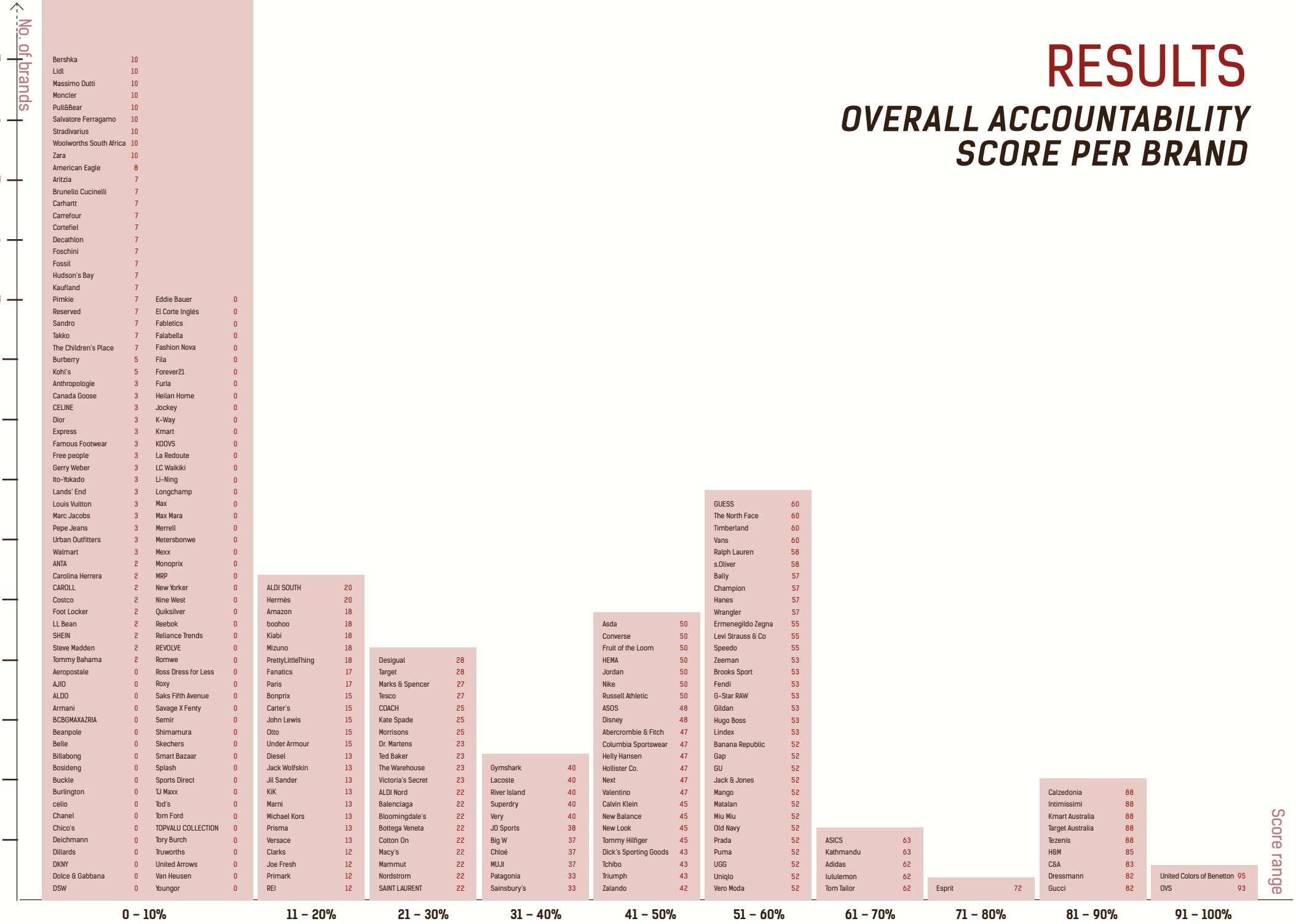
Here we assess what brands are doing to increase the use of sustainable materials and address overproduction. We looked specifically at:

- Public disclosure on brands' strategies and progress to use more sustainable materials
- Public disclosure on brands' overall fibre mix
- Public disclosure on how many items were produced in the reporting period
- Brands' public commitment to degrowth

Image: Fair Wear Foundation

RESULTS

OVERALL ACCOUNTABILITY SCORE PER BRAND

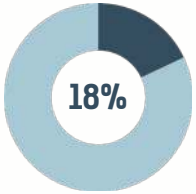


* Brands ranked in alphabetical order by score out of 15 possible points in this section, but shown as rounded-up percentage.

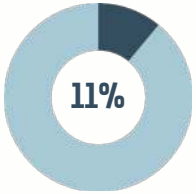
GOVERNANCE

FINDINGS

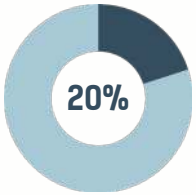
GOVERNANCE



Disclose if executive pay and bonus are explicitly tied to decarbonisation



Disclose the percentage of executive bonus or pay tied to these targets



Disclose incentives for suppliers on decarbonisation

ANALYSIS
GOVERNANCE

Fashion executives are still incentivised to deliver shareholder value above all else – including decarbonisation.

Fashion executives should, indisputably, be held accountable for the human rights and environmental impacts of the brands they lead. However, to ensure accountability, they must be properly incentivised. For the first time, we are looking to see if brands disclose how executive pay, bonuses and/or performance reviews are tied, explicitly, to achieving absolute carbon reduction across the whole value chain. Meaningful incentives for executives to reduce carbon emissions signal a genuine commitment from the brand to decarbonise.

The findings show that just 18% of major brands and retailers disclose this information – highlighting the need for better alignment between accountability, executive incentives and achieving decarbonisation targets. Even fewer (11%) disclose the percentage of executive bonus or pay tied to these targets. Oftentimes, as seen with Versace and Joe Fresh, only 10% of the executive bonus relates to Environmental, Social, and Governance (ESG) targets which include but are not limited to carbon reduction.

In 2023, the highest-paid CEOs primarily received their compensation through stock and option awards. This means that their income is closely tied to the performance of their company's stock. In other words – if the stock value goes up, their compensation increases, inextricably linking their financial interests with the company's success and shareholders' gains.

Despite the urgency of the climate crisis, it is clear that only a minority of executive bonuses are explicitly tied to carbon reduction – the most pressing issue at hand to mitigate this global challenge. This raises a critical question: when will fashion executives be truly held accountable for prioritising their commitment to decarbonisation over maximising profits for shareholders?

> It is clear that only a minority of executive bonuses are explicitly tied to carbon reduction

A slightly higher number of brands (20%) disclose supplier incentives tied to decarbonisation. Supplier incentives such as long-term commitments and contracts, increased orders, price premiums and fewer audits are important to spur on much-needed decarbonisation actions in the supply chain. However, to accelerate changes at the scale and speed needed, incentives and accountability systems must be built at brand AND supplier level. This is especially important considering the well-documented power imbalance between suppliers and their brand customers, and the perception among suppliers that brands and retailers are shifting the burden of decarbonisation onto them.

The findings here highlight there is significant progress needed in integrating ambitious and robust climate targets into corporate governance and leadership priorities. Investors must pressure brands to deliver their decarbonisation commitments across their entire value chain, rather than solely focus on profit and stock performance. Investors should require brands to establish sustainability-linked executive compensation focused on absolute carbon reduction. This includes setting and communicating targets that meet or exceed Paris Agreement goals, using scientifically valid metrics, ensuring independent verification, and reporting progress annually. Executive pay should be tied to these carbon reduction targets, with penalties for non-compliance, and remain separate from other financial performance measures. In addition, if major brands and retailers are to meet their decarbonisation targets, they must collaborate with their suppliers through direct funding or order guarantees, working hand in hand with suppliers to drive meaningful actions across the entire value chain.

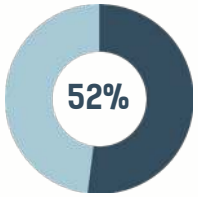
ACCOUNTABILITY

TRACEABILITY

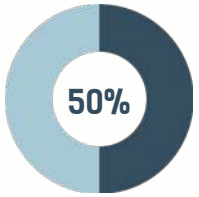
FINDINGS

TRACEABILITY

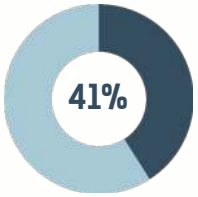
DISCLOSING FIRST-TIER MANUFACTURERS



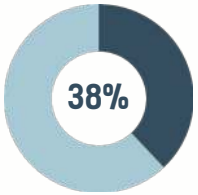
Publish a list of their first-tier manufacturers



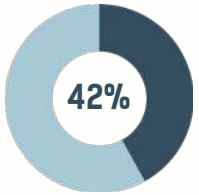
Include the address



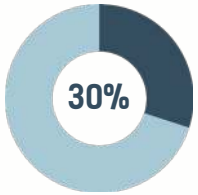
Disclose a publicly available list in alignment with the Open Data Standard for the Apparel Sector



Include the name of the parent company



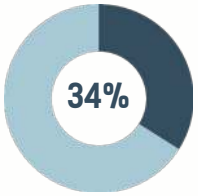
Include the type of product/ service provided



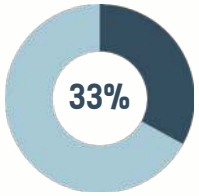
Disclose their supplier lists on the Open Supply Hub

TRACEABILITY

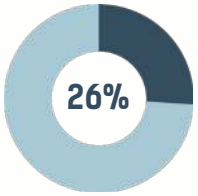
PROCESSING FACILITIES



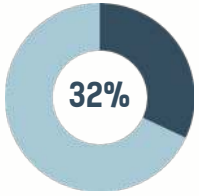
Publish processing facilities beyond the first tier



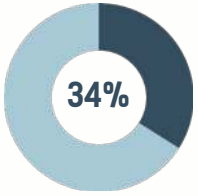
Include the type of product/ service provided



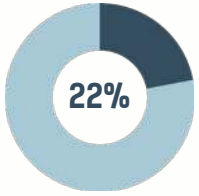
Include the name of the parent company



Disclose a publicly available list in alignment with the Open Data Standard for the Apparel Sector



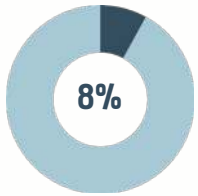
Include the address



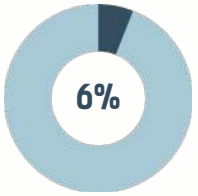
Disclose their supplier lists on the Open Supply Hub

TRACEABILITY

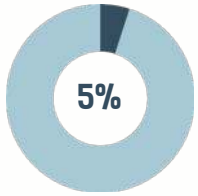
RAW MATERIALS



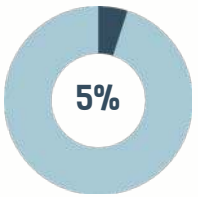
Publish selected raw material suppliers



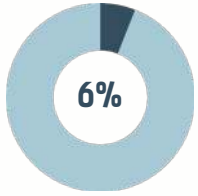
Disclose specific raw material fibre, products or services



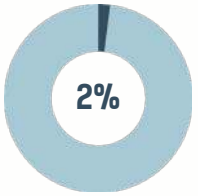
Disclose the name of specific facility or farm



Disclose a publicly available list in alignment with the Open Data Standard for the Apparel Sector



Include the address



Disclose their supplier lists on the Open Supply Hub

ANALYSIS
TRACEABILITY

Supply chain transparency has increased since Fashion Revolution began advocating for it more than a decade ago, however, the most energy-intensive areas of the supply chain remain the most opaque.

Publicly-disclosed supplier lists are valuable to environmental and human rights activists, trade unions and worker representatives, as they provide evidence of where responsibility lies when labour and environmental abuses are discovered within the supply chains of major brands and retailers.

Supply chain traceability helps identify hotspots, giving a clear picture of where brands are sourcing their products

Regarding the climate crisis, supply chain traceability helps identify hotspots, giving a clear picture of where brands are sourcing their products. This insight is critical for assessing whether these areas are significant contributors to carbon emissions or are particularly vulnerable to extreme weather events, such as droughts, floods, and heatwaves.

This year, 52% of major fashion brands and retailers disclose their direct suppliers' lists, maintaining the same level as in 2023.

This marks significant progress when compared to the inaugural FTI edition in 2017, where only 32 out of 100 brands shared this information. Nine out of 250 brands reviewed in last year's Index have since disclosed their first-tier manufacturers – Bloomingdale's, Carter's, Express, Kiabi, Macy's, Michael Kors, Prisma, The Warehouse and Versace – while six brands – Armani, Carrefour, El Corte Inglés, LL Bean, Pimkie, Saks Fifth Avenue – are no longer disclosing direct supplier lists in line with our methodology.

At processing level, 34% of brands disclosed the names of their facilities – a slight decrease from 2023. Estimates indicate that material production and raw material processing are responsible for approximately 68% of scope 3 emissions. Industrial processes such as yarn spinning, fabric weaving and knitting, and fabric dyeing consume substantial amounts of heat and electricity. Given the industry's urgent need to decarbonise, a lack of visibility in the most energy-intensive part of the supply chain hampers efforts to reduce emissions and even more importantly, obscures who is accountable for addressing the issue. It is concerning that 66% of big fashion brands do not reveal their processing facilities. This aligns with a broader trend – the areas of the global fashion industry that most urgently require climate action are often the least transparent.

Traceability tends to diminish further down the supply chain, with brands typically having the least visibility at the raw material level. Only 8% of brands disclose at least a small selection of their raw material suppliers, with just 5% naming specific facilities and 6% specifying raw material types. This lack of transparency is concerning because raw material extraction significantly contributes to emissions and deforestation. Raw material extraction is responsible for nearly a quarter (23%) of scope 3 emissions, and several studies show that deforestation continues to be linked to the production of key raw materials used in our clothes and shoes, such as leather, viscose and cotton. In fact, 300 million trees are logged each year to produce viscose, with ancient forests in Indonesia, Canada, and Brazil bearing the brunt of this demand. Ancient forests are crucial carbon sinks, meaning they absorb large amounts of carbon dioxide from the atmosphere. When these forests are destroyed, not only is this carbon storage capacity lost, but the carbon stored in the trees is released back into the atmosphere, exacerbating climate change. Additionally, deforestation disrupts ecosystems, reduces biodiversity, and destabilises local climates, further intensifying global environmental issues.

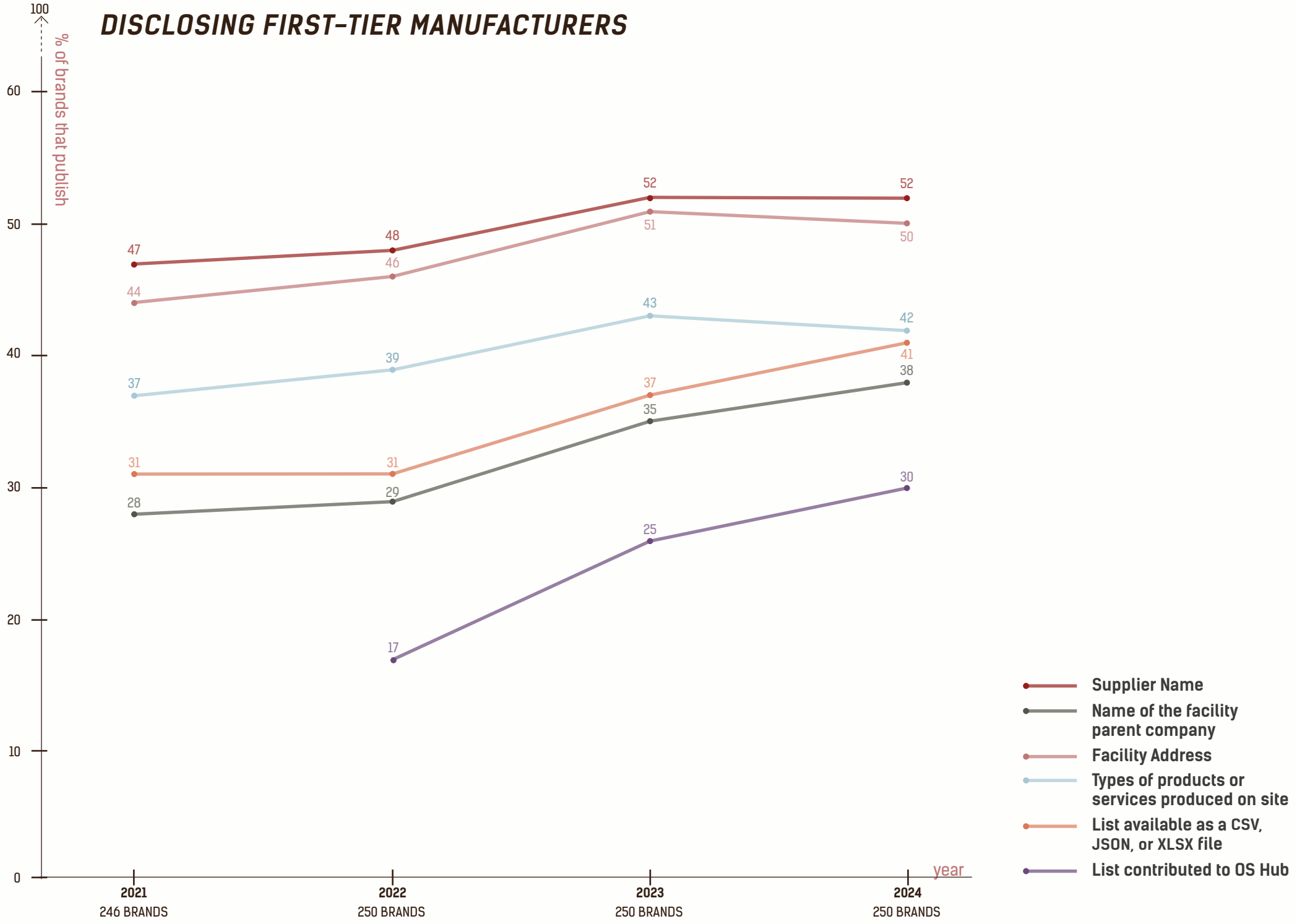
Another relevant data point analysed in the research is whether the brands' supplier lists were provided to the Open Supply Hub (OS Hub) in order to enable collaboration as well as easy and efficient access

for trade unions & NGOs. Of the brands analysed this year, 30% disclosed their direct supplier lists on the OSH platform, a 13 percentage points increase from 2022 – the first year when this indicator was included. Additionally, 41% provided supplier lists in a machine-readable format (CSV, JSON, or XLSX), a significant improvement from 10% in 2019.

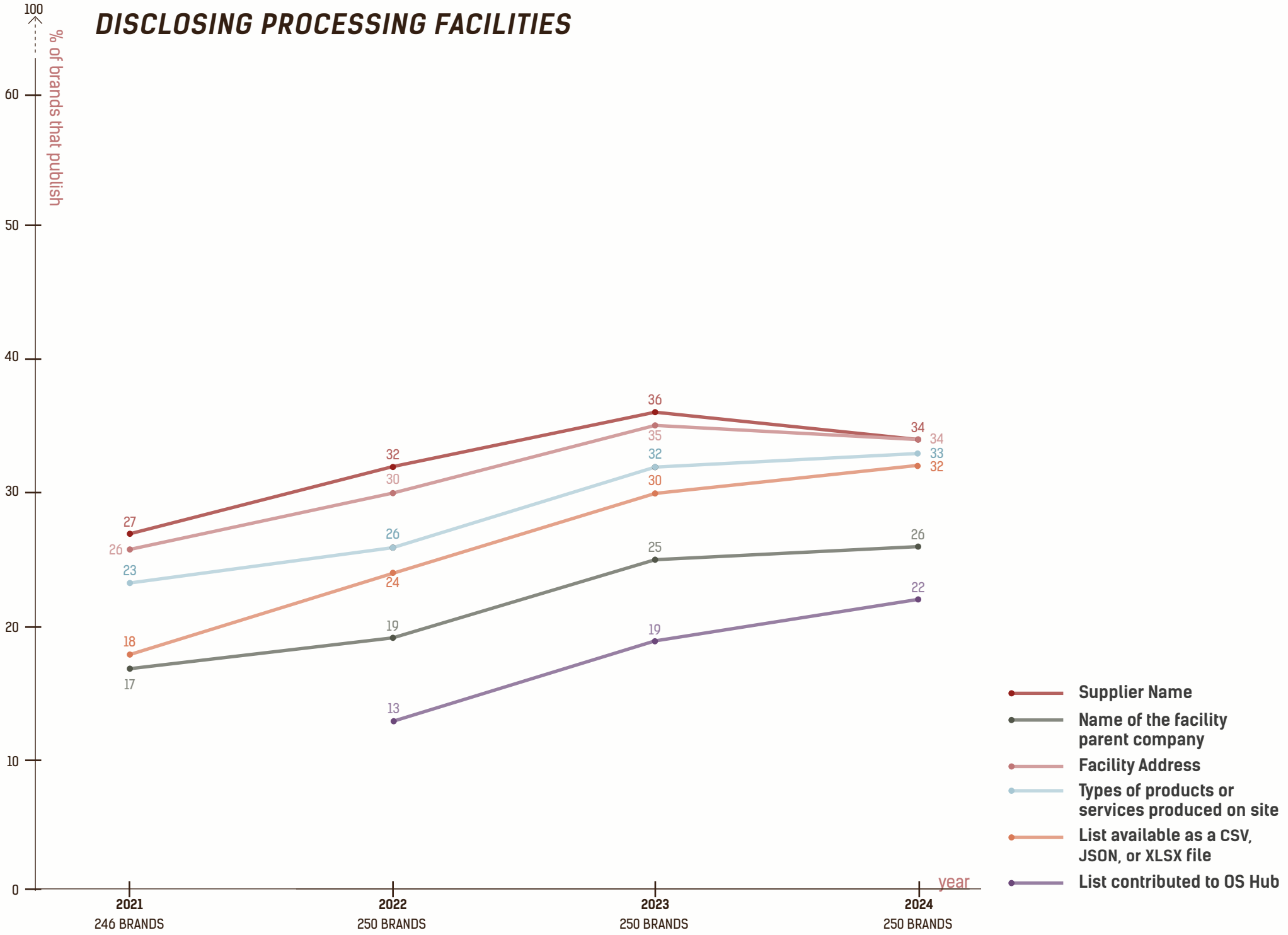
It is encouraging to see significant improvements in the number of major fashion brands disclosing their supply chains since 2017, with now over half (52%) doing so. However, this progress appears to have slowed and begun to plateau. This highlights the need for binding regulation to move the non-movers that will not disclose voluntarily, requiring major fashion brands to publicly disclose supply chain details to address human rights and environmental risks effectively. Increased transparency and accountability are crucial in combating the climate crisis. At EU level, Fashion Revolution is among those advocating for ambitious reporting requirements for fashion brands as part of the forthcoming sector-specific standards for the textile industry that will be required as part of the Corporate Sustainability Reporting Directive (CSRD). On several key issues, including transparency, it's far too easy for many brands to remain impervious to advocacy and resistant to change if the obligations on them are purely voluntary. The urgent need for meaningful legislation to drive the non-movers and enable a level playing field has never been more important.

Image: Fair Wear Foundation

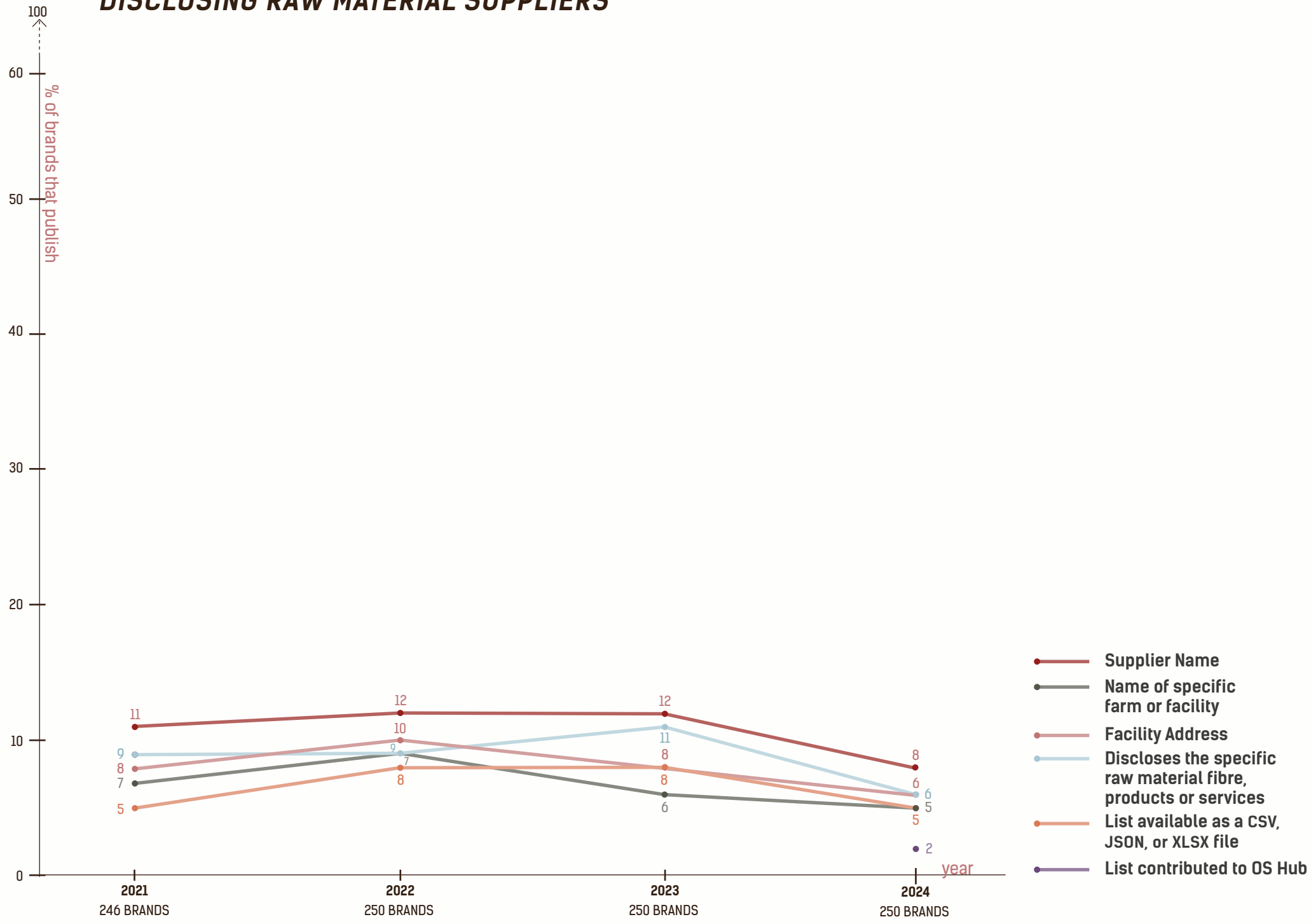
DISCLOSING FIRST-TIER MANUFACTURERS



DISCLOSING PROCESSING FACILITIES



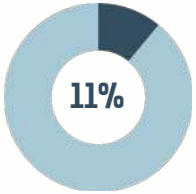
DISCLOSING RAW MATERIAL SUPPLIERS



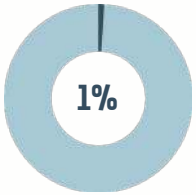
MATERIALS & OVERPRODUCTION

FINDINGS

OVERPRODUCTION

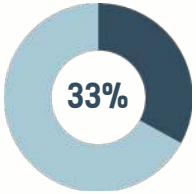


Discloses quantity of products produced annually

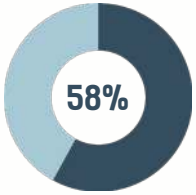


Discloses a commitment to degrowth

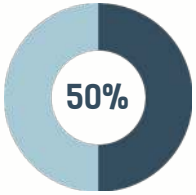
SUSTAINABLE MATERIAL USE



Discloses breakdown (% or tonnes) of types of fibres sourced annually



Discloses a time-bound and measurable sustainable materials strategy, roadmap or targets



Publishes annual progress on achieving sustainable material targets

ANALYSIS

SUSTAINABLE SOURCING & MATERIALS

Only 33% of brands disclose the breakdown of fibres sourced annually – concealing the industry's worrisome reliance on synthetic fibres.

Given the prevalence of false claims around so-called 'sustainable' materials, transparency of the actual materials used to make clothing is critical. Many brands claim the material fibres in their products are sustainable without proof, often focusing on a single environmental aspect. Governments are now cracking down on greenwashing. In addition to investigations into several brands' environmental claims taking place in the UK and Australia, the Norwegian Consumer Authority ruled the Higg Materials Sustainability Index (Higg MSI) unlawful to support such claims from retailers. These actions, which have resulted in accountability, illustrate why transparency is crucial to enable change. Nonetheless, the need for robust evidence-backed claims remains a persistent issue.

> Synthetic fibres in our clothes account for 1.35% of global oil consumption – this exceeds the annual oil consumption of Spain

The fashion industry's reliance on fossil fuels is exemplified by the fact that synthetic fibres in our clothes account for 1.35% of global oil consumption – this exceeds the annual oil consumption of Spain. If the fashion industry continues on this trajectory of oil-dependency, by 2030 almost three-quarters (73%) of our textiles will be produced from fossil fuels. Fashion

While 58% of brands disclose sustainable material targets, only 11% reveal their supply chain's energy sources. This means 'sustainable' clothes might still be made with fossil fuels.

brands' favoured fibre – polyester – will account for 85% of this. And yet, our findings are that only 33% of brands disclose their annual fibre mix breakdown, which fails to provide a full picture of the fashion industry's material usage and its collective environmental impact.

> By 2030 almost three-quarters of our textiles will be produced from fossil fuels and fashion brands' favoured fibre – polyester – will account for 85% of this

Research by Changing Markets Foundation found that many brands are opaque about their polyester and other synthetics suppliers yet they make up a majority of their collections and have significant climate and waste impacts. While there is greater acknowledgement of plastic pollution from plastic packaging, there is less awareness of polyester clothing as plastic. Consequently, there remains a persistent disconnect regarding the environmental threats posed by clothes made from fossil fuel-based fibres. These garments are nearly unrecyclable, significantly contribute to the fashion waste crisis, and contaminate our bodies and natural environments with plastic microfibres. Fossil fuels and fashion form a disastrously harmful combination.

For more in-depth discourse specifically on fossil fuels within materials see Fossil Fashion Campaign.

Amid greenwashing reaching new heights, new regulations are underway to tackle false claims made by brands. In the EU, the Green Claims Directive will require fashion brands to substantiate claims about the environmental footprint of their products and services using standardised methods and the Empowering Consumer for the Green Transition Directive will forbid vague environmental claims, meaning that companies will no longer be able to declare that they are 'green' or 'environmentally friendly' if they cannot demonstrate it. This means brands must disclose the percentage of sustainable materials used and provide evidence of the environmental benefits, including detailed lifecycle information from production to disposal, and the impact on fossil fuel usage throughout this process. By enforcing such transparency, these regulations aim to curb greenwashing and ensure that sustainability claims are reliable, comparable, and verifiable.

Despite these new requirements, however, only 58% of brands disclose sustainable materials targets for one or more materials and an increasing number of clothes are made using fossil fuel-based textiles. Fashion relies on fossil fuels to power factories, yet only 11% of major brands and retailers disclose their supply chain's energy sources. This means 'sustainable' clothes might still be made with fossil fuels.

We know that synthetic materials such as polyester, nylon, and acrylic are derived from petroleum but what is less obvious is that even natural materials like cotton often rely on fossil fuel-based energy for cultivation, processing, and transportation. Cotton farming, for example, is highly dependent on machinery powered by diesel and other fossil fuels for planting, irrigation, and harvesting. The processing of cotton into fabric involves energy-intensive steps such as spinning, weaving, and dyeing. These processes typically require substantial amounts of electricity and heat, which are often generated from fossil fuels. The dyeing process, in particular, is a significant contributor to the fashion industry's carbon footprint, as it requires large amounts of hot water and steam, usually produced by burning fossil fuels.

> Even natural materials like cotton often rely on fossil fuel-based energy for cultivation, processing, and transportation

The energy-intensive nature of these processes not only increases the carbon footprint of natural fibres but also negates many of the potential environmental benefits that these 'sustainable' materials might otherwise offer. The reliance on fossil fuels throughout the supply chain means that even 'sustainable' clothes can have a significant environmental impact due to the fossil fuel-based energy used in their production.

ANALYSIS
OVERPRODUCTION

Most brands (89%) do not disclose their production volumes.

The fashion industry today is bloated with overproduction, overconsumption and waste. The industry continues to produce at staggering volumes, with global consumption projected to increase 63% by 2030, with total clothing sales potentially reaching 160 million tonnes by 2050, more than three times today's amount. Despite this massive output, only 1% of clothes are recycled into new garments each year. In the UK alone, of the 300,000 tonnes of clothing donated to charity annually, an estimated 80% is incinerated. The fashion industry's linear 'take-make-dispose' model starkly contrasts with the urgent need for rapid emissions reduction. This cycle of waste represents a significant loss, considering the finite resources and human effort that go into making our clothes.

Countless tonnes of clothing waste are scattered across the globe. Intensifying this waste crisis, microplastic particles shed from garments during washing and wearing infiltrate the atmosphere, waterways, and even human placentas.

> Total clothing sales could reach 160 million tonnes by 2050, more than three times today's amount

Despite the indisputable fact that clothing waste reaches all facets of life, 89% of brands still do not disclose their annual production volumes. Brands absolutely know how much they are producing; what business can survive without this information? The continued lack of transparency begs the question, what's being hidden?

The term overproduction has been co-opted by major fashion brands to mean excess, unsold goods. However, Fashion Revolution's stance is clear: overproduction means the overall growing quantities of clothing and other textiles, and as such constitutes a surplus, whether these clothes are discarded or stored in the consumers' wardrobes and cupboards. By this definition, simply 'producing to demand' does not equate to a viable solution to overproduction by our definition. We are calling for producing less – full stop.

> In the UK alone, of the 300,000 tonnes of clothing donated to charity annually, an estimated 80% is incinerated

The necessity to produce less is undeniable. This means that business models reliant on mass-selling, which drive overproduction, need to be overhauled. The Fashion ReModel, an initiative from Ellen MacArthur Foundation which some big brands have signed on to, promises to tackle this by "decoupling revenue from production" via circular business models such as rental, resale, repair, and remaking. However, uptake to similar efforts have historically been slow and incremental. Last year's Global Fashion Transparency Index found that just 30% of major brands offered new business models that slowed consumption. Brands ought to innovate to meet the challenge of slowing down production.

For example, modular design with clothing that can be disassembled and reimagined such as a coat that can transform into a skirt or a short jacket represents an opportunity. However, false solutions that detract from the need to simply produce less clothing must be avoided.

Already we are seeing that overestimating the importance of garment durability and underestimating the environmental impact of overproduction is shaping the policy landscape. Research by Oslo Met University reveals the "Plastic Elephant in the Room" – which critiques the EU's Sustainable Textiles Strategy, particularly its focus on durability. The research argues that the most effective way to reduce the fashion industry's environmental impact is to cut production volumes rather than merely extending product lifespans (and that focusing on durability unintentionally supports synthetic fossil fuel-derived fibres).

EXTENDED PRODUCER RESPONSIBILITY (EPR) & TARGETED PRODUCER RESPONSIBILITY (TPR)

	Extended Producer Responsibility (EPR)	Targeted Producer Responsibility (TPR)
Definition & Principle	EPR requires manufacturers – fashion brands – to bear financial responsibility for the entire lifecycle of their products, including disposal. The principle behind EPR is the Internalised Cost of Waste Management, meaning producers pay for the waste management costs of their products. The OR Foundation, through both their Speak Volumes campaign and their research, advocate for leveraging Extended Producer Responsibility to catalyse a justice-led circular textiles economy.	TPR is a proposal developed to extend the concept of EPR specifically to reduce overproduction in the fashion industry. It focuses on labelling clothing with the date of manufacture or market introduction and applying a fee based on the product's lifespan. Oslo Met research advocates how at the end of a product's lifespan, when the garment enters a waste stream, a fee would be applied to the fashion brand, commensurate with how long the product was used for. As a policy instrument, TPR would deter brands from overproducing clothes.
Implementation & Fee Structure	The OR Foundation suggests an eco-modulated fee of US $0.50 – $2.50 (depending on the item) to be imposed on the retailer for each newly produced garment at the time it is made. These fees are directed to communities and 'end-of-life managers' in the Global South, such as Ghana, who manage the end-of-life stage of clothing.	The fee is imposed when the garment enters the waste stream, calculated based on how long the product was used. This fee structure aims to create a direct financial disincentive for producing garments that are quickly discarded.
Goals and Impact	The aim is to create a justice-led circular textiles economy by ensuring producers contribute to the infrastructure needed for waste management. By making producers pay more as they produce more, EPR seeks to discourage overproduction and promote sustainable practices.	The primary goal is to deter overproduction by making it more costly for fashion brands to produce items with short lifespans. TPR promotes longevity in clothing use and encourages brands to produce higher quality, longer-lasting garments.
Information source	stopwastecolonialism.org/stopwastecolonialism.pdf	clothingresearch.oslomet.no/wp-content/uploads/sites/1026/2023/03/Briefing-paper-TPR-QA.pdf

The fashion industry is avoiding accountability by failing to disclose the excessive amount of clothes they make and the emissions generated in the process.

Nearly half of the brands reviewed (45%) disclose neither how many clothes they make each year nor their raw material carbon footprint. This is important because it means that nearly half of big fashion brands are (1) not telling us how much they are making and (2) how many emissions are generated in the process of making our clothes – that often end up being discarded after only a few wears. These emissions are particularly concerning at the raw material level, where the extraction and processing of materials like cotton, polyester, and wool contribute significantly to the industry's overall carbon footprint. This is highlighted by the fact that the textile sector was the third largest source of water degradation and land use in 2020. By failing to disclose the emissions generated during the extraction and processing of fibres for clothing, the fashion industry is essentially having its cake and eating it too, skirting accountability while continuing to contribute significantly to environmental harms linked to production.

How much exactly is big fashion producing?

The Global Fashion Transparency Index has been examining brands' transparency on their annual production volumes since 2020. Previously, we accepted disclosures both in terms of the number of items produced per year and in tonnes. However, to better align with The OR Foundation's Speak Volumes campaign, we now only accept disclosures that explicitly state the number of items produced. Further, Oslo Met research shows that measuring annual production by volume weight incentivises synthetic fabrics, as plastics are lighter than natural fibres.

For instance, Inditex (owner of Zara, Bershka, Pull & Bear, Massimo Dutti, and Stradivarius) previously disclosed in 2020 that they produced 1.6 billion items, but shifted to reporting 565,027 tonnes of garments placed on the market in subsequent years. It remains unclear why brands prefer to disclose production volumes in tonnes rather than units, but it may be because tonnes are harder to conceptualise. For reference, an average-sized small car weighs just over 1 tonne. This shift in reporting makes it challenging for stakeholders to grasp the actual scale of production. Please refer to the table on the next page to see what brands report about their production volumes.

We have heard time and again that clothing overproduction is a 'fast fashion' problem, and yet it is clear that luxury brands are also overproducing and ultimately driving trends for other brands to take inspiration from and mass reproduce similar styles. For too long, the fashion industry has hidden the true scale of overproduction. Rather than taking responsibility for downstream impacts, they have failed to act while importing countries foot the bill, resulting in serious human rights and environmental implications. The OR Foundation has reported that an estimated 15 million used garments flood Kantamanto Market in Ghana per week. Basic transparency on annual production volumes is just one critical step to help grapple with the global fashion industry's waste and is the bare minimum that we can expect from brands.

Just two big fashion brands disclose a commitment to degrowth, signalling that the vast majority of the industry is unwilling to tackle its unsustainable business model.

Whilst major brands are making commitments to decarbonise their global supply chains, a meaningful impact on carbon reduction must coexist alongside addressing overproduction and overconsumption as a vital part of reducing climate impact. Time is running out and the industry desperately needs to slow down and scale back.

> Nearly all (99%) of brands do not disclose a commitment to reduce production of new clothes

This year, we are, once again, capturing whether brands disclose a commitment to 'degrowth,' a concept aimed at balancing economic activity with planetary boundaries through a planned reduction in production and consumption. Degrowth emphasises that those who have benefited most from relentless resource extraction must take the lead in addressing climate impacts and reducing consumption.

Despite this urgent need, nearly all (99%) of brands do not disclose a commitment to reduce production of new clothes. The dominant global ideology behind growth is intrinsically tied to energy and resource consumption. As production increases, the economy demands more energy, resources, and generates more waste, pushing consumption even further beyond safe planetary limits.

The planetary boundaries concept presents a set of nine boundaries that we must exist within for humanity to continue to develop and thrive for generations to come. These vital thresholds, such as climate change, biodiversity and the nitrogen cycle, are already being approached or have been crossed; for example, the Arctic could be ice-free by Summer 2030. The reality is, if we continue to push these boundaries, we increase the risk of generating irreversible environmental changes like rising sea levels and temperatures. We are overshooting, with grave ecological consequences.

> **"Brands are manufacturing demand in the same way they manufacture too many clothes"**
>
> **Liz Ricketts**
> Co-founder and Executive Director of
> The OR Foundation

This highlights the need for brands to not only produce less but also rethink how they stimulate demand through relentless marketing on social media, targeted digital ads, email campaigns, and a constant cycle of discounts and promotions.

It is clear that we cannot shop our way out of the climate crisis and yet the industry continues to grow at a staggering rate, ignoring the science and prioritising the money. To put this excess into clearer view, recent research by WRAP finds that the average UK adult has

BRAND DISCLOSURES ON PRODUCTION VOLUMES

Brand	Annual product volume in the reporting period	Year
Adidas	Our footwear manufacturing partners produced approximately **311 million pairs of shoes**	2023
Bally	The number of items crafted by Bally totaled around **450,000 pairs of shoes and approximately 650,000 ready-to-wear items and accessories**	2022
Calzedonia Group *(Calzedonia, Intimissimi, Tezenis)*	The Calzedonia Group produced **351 million items of clothing** in-house and using service providers	2022
Desigual	**11,609,806 units** produced	2022
FENDI	FENDI produced and distributed around **3,000,000 products**	2023
lululemon	Total products procured (units, '000's): 141,088 = **141,088,000 items**	2022
Mango	**155,159,011 units** manufactured	2022
OVS	OVS manufactured **196,740,204 million items of clothing and accessories, 4,463,314 household items as well as 30,070,085 perfumery items**	2023
Wrangler	**175 million units of apparel and accessories** produced and sourced	2022

118 items of clothing in their wardrobes of which one quarter (26% – 31 items) were unworn for at least a year – meaning there are 1.6bn items of unworn clothing in UK wardrobes alone with some studies suggesting that globally, there is enough clothing already in circulation to outfit the next six generations of people.

Superdry and United Colours of Benetton are the only 2 out of 250 brands who have disclosed a commitment to degrowth, with Superdry disclosing that they are "implementing a 'degrowth' strategy to ensure [they] are buying less and reducing product wastage" and reducing their "total buy volumes by 12% whilst also reducing historic excess by 23%".

Last year, United Colours of Benetton disclosed their plan to 'decouple the company's economic performance from the increase in the volume of garments' and disclosed that "in 2023 the total production volume for Benetton Group was reduced by 10% compared to last year and by 20% compared to 2019, with the commitment to maintain this trend in the next years."

What this could look like at scale, according to The OR Foundation, is for reduction targets for new clothing of at least 40% over five years, balanced by the increase of reuse and remanufacture of existing materials.

The concept of degrowth stands in stark contrast to an industry driven by relentless expansion. There have been meteoric rises and also collapses. Sudden collapses can happen, without warning, where a business falls into administration. When this does happen, time and again, shareholders are the first to be paid, far before the suppliers and workers who make the clothes – if they are paid at all.

Degrowth, however, offers a different approach. It necessitates addressing the industry's power imbalance to ensure that the voices and concerns of garment workers, upon whom major fashion brands depend, are heard and prioritised. Degrowth is not synonymous with recession or a strategy to make workers bear the costs of change – it is 'the end of business-as-usual and a horizon of opportunity'.

A degrowth approach would involve significant systemic changes, such as the implementation of policies ensuring living wages and better working conditions for all workers, particularly in supply chains. This would help redistribute wealth more equitably and ensure that workers' voices are central to policy-making processes. Paying workers living wages has a two-fold impact – it helps alleviate money poverty and time poverty. Garment workers often endure excessive working hours, frequently exceeding 60 hours per week, merely to make ends meet.

"The fashion industry has a big role to play in resolving the climate crisis and transparency is a vital step towards that goal. Meaningful climate action requires brands to address carbon intensive practices at all stages through their supply chains – including raw material sourcing for textiles like viscose and energy sourcing in production. This research is an important benchmark for the sector and this year's Index reveals significant gaps in visibility. It reinforces the need for greater transparency and an acceleration away from carbon-intensive raw materials, such as sourcing viscose from carbon-rich forests, and towards low-carbon circular alternatives."

Nicole Rycroft
Founder and Executive Director
Canopy

DECARBON-ISATION

APPROACH

WHAT THIS SECTION COVERS

In 2019, the global fashion industry was estimated to be responsible for a staggering 1 billion tonnes of greenhouse gas emissions (GHG emissions). There are long-standing estimates suggesting that the industry accounts for 3–8% of total GHG emissions, with some citing 10%. However, the true extent remains unclear. A lack of transparency in emissions reporting, coupled with flawed carbon-tracking systems, obscures the true scale of the problem. Without decisive action, the fashion industry's emissions could soar 30% by 2030 – with others suggesting 40%.

The industry will fail to meet targets needed to limit global heating to 1.5°C. Some projections indicate the fashion sector alone will overshoot the 1.5°C target by 50%. These estimates must be viewed within the crucial context that transparency around big fashion's emissions is unclear given the absence of comprehensive primary emissions data. The problem may be significantly larger than current models indicate. The urgency for accurate emissions tracking, primary data on energy use and consumption, alongside robust climate targets and emissions reduction in fashion has never been more critical.

In line with the urgency to reduce emissions, this section is the most heavily weighted of the report – worth 40% of brands' overall score.

The Decarbonisation section is broken down into the following subsections:

DECARBONISATION

Examines transparency of brands' emission reduction targets, implementation plans, and progress, including disclosure on specific actions and strategies, time-bound targets for renewable energy, coal phase-out, and electrifying energy-intensive processes in garment manufacturing.

ENERGY CONSUMPTION

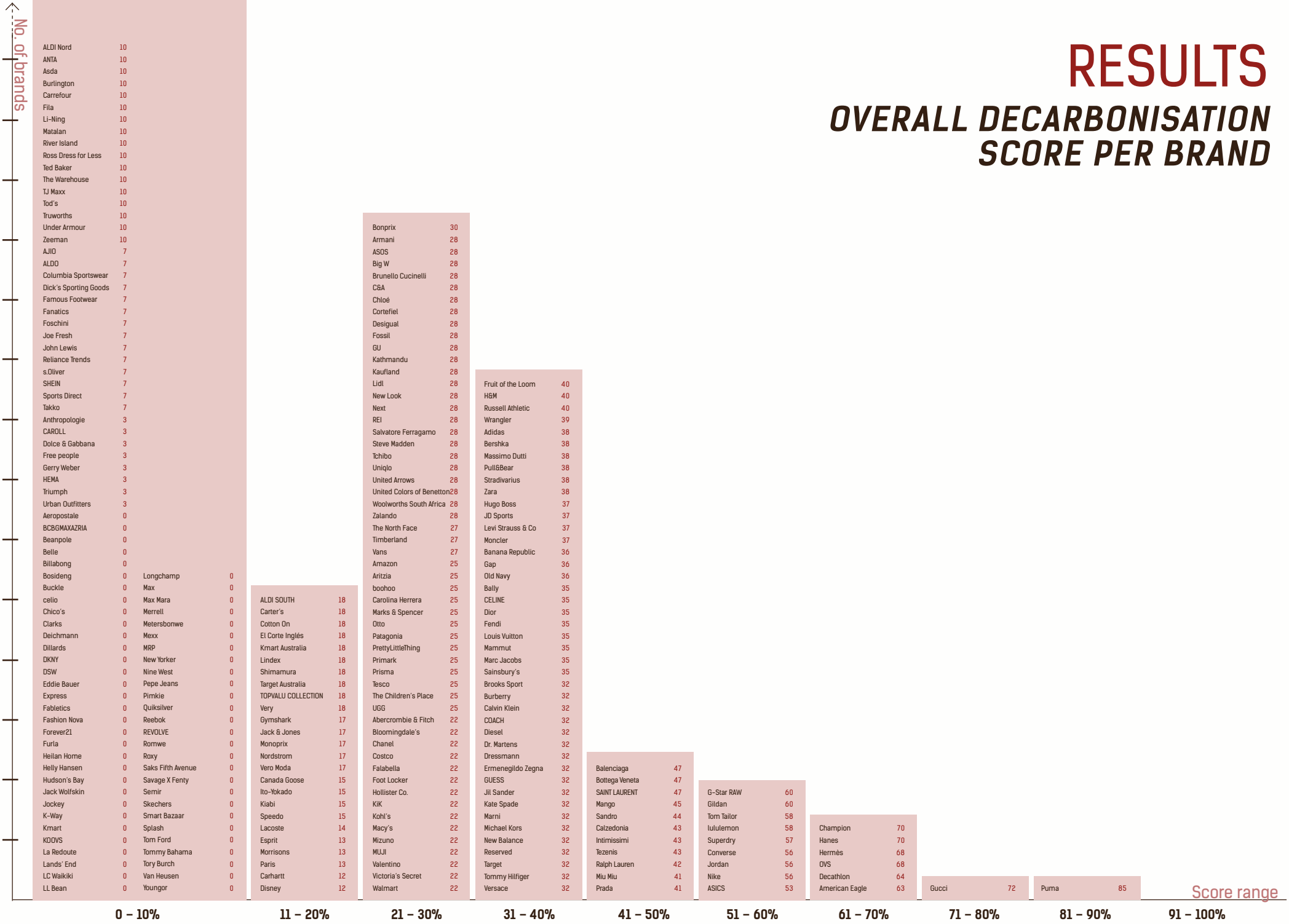
Examines transparency of how brands define renewable energy, publicly disclose their energy and electricity consumption in their own operations and supply chain level, broken down by country and production process.

GREENHOUSE GAS (GHG) FOOTPRINT

Examines transparency of how brands publicly define their company's scope 1, 2 and 3 emissions, and what they are disclosing about their GHG footprints across the different scopes.

RESULTS

OVERALL DECARBONISATION SCORE PER BRAND



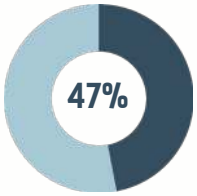
* Brands ranked in alphabetical order by score out of 60 possible points in this section, but shown as rounded-up percentage.

DECARBONISATION

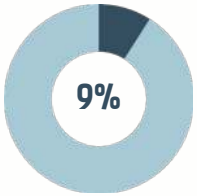
DECARBONISATION

FINDINGS

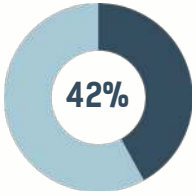
DECARBONISATION



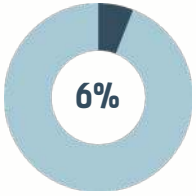
Publishes time-bound, measurable commitment to decarbonisation covering scopes 1 to 3



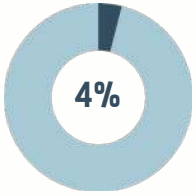
Publishes near (5–10 years) and long term (2040–2050) science based targets (aligned with the 1.5°C pathway) in line with the Science Based Targets Initiative



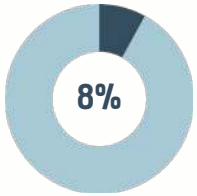
Publishes measurable progress towards decarbonisation



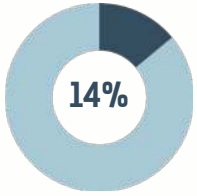
Discloses a renewable energy target for the supply chain



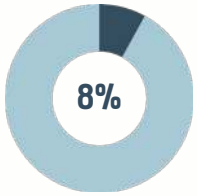
Discloses progress against this target



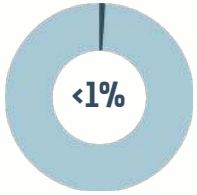
Discloses a renewable electricity target for the supply chain



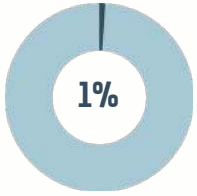
Discloses target to phase-out combustion of thermal coal (or other fossil fuels)



Discloses progress against this target



Discloses target to electrify all energy-intensive processes in garment manufacturing where feasible



Discloses progress against this target

ANALYSIS
DECARBONISATION

Nearly one quarter of the world's biggest fashion brands disclose nothing on decarbonisation, signifying that the climate crisis is not a priority for them.

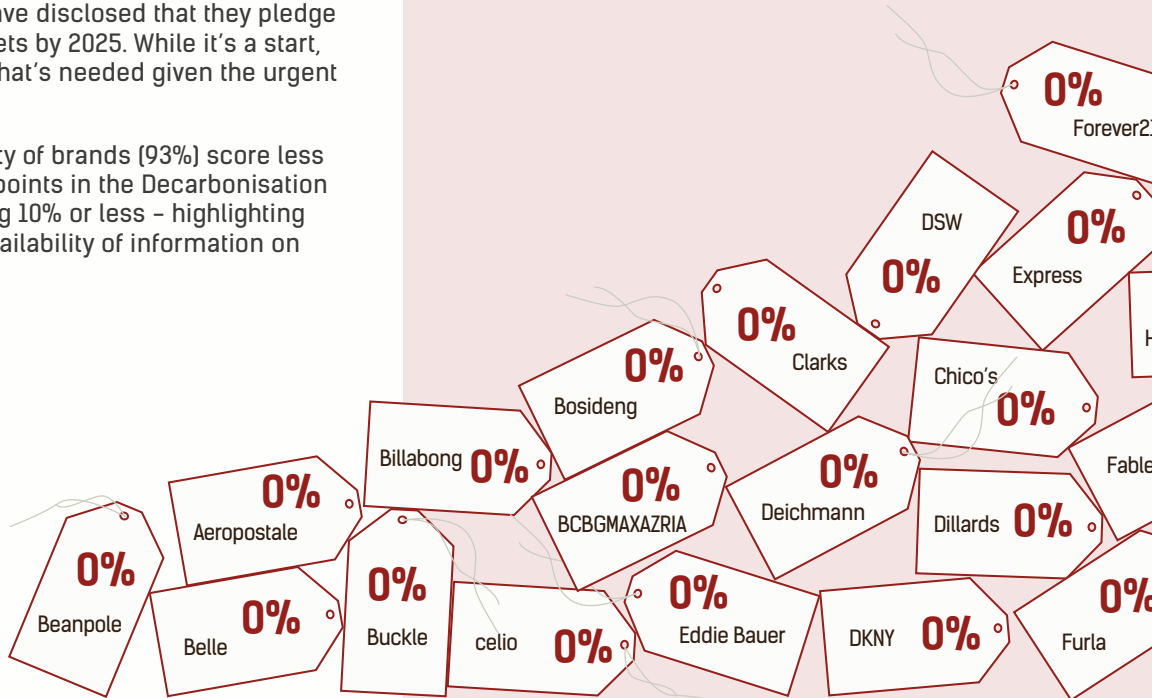
This year, we find that 59 out of 250 brands score zero in the Decarbonisation section. Brands scoring zero in this section do not disclose any Science Based Targets Initiative (SBTi) verified targets covering scopes 1 to 3, nor do they report progress or publish time-bound and measurable targets for renewable energy, renewable electricity, or coal phase-out. They do not disclose anything about their energy consumption or fuel mix at operations and supply chain level. The reality that 24% of the world's largest fashion brands score zero in this critical area highlights a significant lack of commitment to decarbonisation and an alarming lack of urgency. Globally, we need to halve emissions by 2030, a deadline fast approaching, yet these brands hide their decarbonisation efforts, possibly because they do not have any meaningful action to report.

> The reality that almost 25% of the world's largest fashion brands score zero in this critical area highlights an alarming lack of urgency

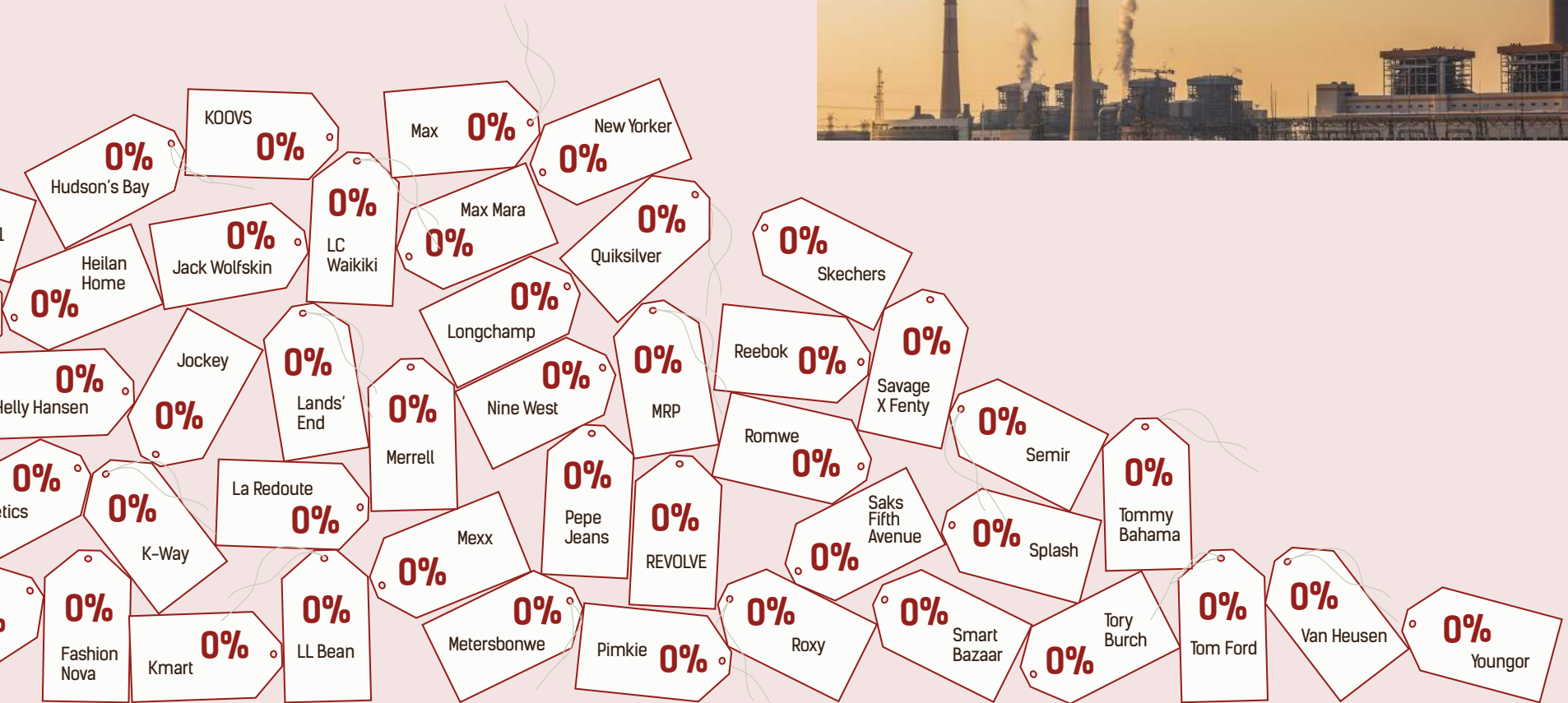
There's a possibility they are taking action but choosing not to publicise it. However, given that sustainability is often leveraged as a marketing tool and given the regulatory pressure for more transparency and action on decarbonisation, their silence is telling. The most logical conclusion is that these brands are not prioritising the climate crisis. On the other hand, some brands that scored zero have disclosed decarbonisation targets – but they are not verified by the SBTi and therefore are not awarded points. Others have disclosed that they pledge to set SBTi-approved targets by 2025. While it's a start, it falls woefully short of what's needed given the urgent nature of the crisis.

The overwhelming majority of brands (93%) score less than half of the available points in the Decarbonisation section – with 39% scoring 10% or less – highlighting a significant gap in the availability of information on decarbonisation efforts.

BRANDS SCOR



ING 0% IN THIS SECTION



ANALYSIS
DECARBONISATION

Less than half of the biggest fashion brands in the world disclose a credible* emissions reduction target.

In this report and previous editions of the Global Fashion Transparency Index, we have tracked whether brands publicly disclose a time-bound and measurable commitment to decarbonisation. Our research reveals that 47% of brands now publish decarbonisation targets for their operations and supply chain, verified by the Science Based Targets Initiative (SBTi). This is a significant increase from 34% in 2023, showing good progress that may be attributed to increased regulatory pressure and industry standards, consumer expectations and investor and stakeholder pressure.

VERIFICATION BY THE SCIENCE BASED TARGETS INITIATIVE

We only accept targets that cover scopes 1, 2 and 3 (own operations and supply chain) and are verified by the Science Based Targets Initiative (SBTi). As the world's most influential validator of corporate targets, SBTi plays a critical role in corporate climate commitments. SBTi verification is integrated into the methodology of this report because utilising SBTi enhances the efficiency and standardisation of these targets, facilitating straightforward comparison across the 250 brands in the scope of this research. Without a standard framework for setting and communicating climate goals, corporate reporting would become disorganised and confusing, making accountability more challenging to achieve (than it already is!). While SBTi's standards are currently being redrafted, including a controversial consideration of offsets to count toward progress on corporate climate targets, this report's use of their methodology predates those possible changes.

* i.e. one that covers scopes 1 to 3 and is verified by the Science Based Targets Initiative

Most major fashion brands lack robust targets. Only four disclose scope 3 emission reduction goals that meet the UN's call for a 55% reduction by 2030.

Last year, we introduced a new indicator to assess brands' decarbonisation plans by examining their transparency in disclosing both near *and* long-term Science Based Targets (SBTs) aligned with a 1.5°C pathway. When the SBTi verifies a target as 1.5°C-aligned, it means the target adheres to the latest climate science aimed at limiting global warming to 1.5°C above pre-industrial levels. Therefore, having a near and long-term target aligned with the science means that the near-term target can help drive immediate action (e.g. drive the current business strategy and investments) whereas the long-term target outlines a vision for a sustained effort (e.g. investment in new technologies and business models to unlock deep decarbonisation), cementing commitment to achieving decarbonisation goals.

Last year, 12% of brands received points for this indicator but this year, only 9% did. The reason for a slight drop in disclosure may be due to some brands' commitments being removed from SBTi for not making sufficient progress toward them.

In this report, near-term targets are defined as those set for the next five to ten years, while long-term targets refer to milestones set for 2040 and 2050. Notably, the SBTi does not align scope 3 targets with the 1.5°C classification because scope 3 emissions encompass a wide range of indirect emissions that are more complex to standardise across various sectors.

Our research did not extend to assessing the individual ambition levels of each brand's targets – as we prioritise transparency as a critical first step toward accountability. However, it is notable that a mere four out of 250 of the world's largest brands (ASICS, H&M, Marks & Spencer, and Patagonia) disclose absolute emissions reduction targets for the near term that meet the level of ambition required, as defined by the UN's Emissions Gap report which calls for a 55% reduction in absolute emissions by 2030 compared to 2018 levels. It is worth noting that there are only two brands whose targets go further. The first being ASICS, who commits to reduce absolute scope 3 GHG emissions from purchased goods and services

CLIMATE COMMITMENTS REMOVED

As of March 2024, several fashion brands failed to set a long-term science based target to reach net-zero value chain emissions by 2050, missing the crucial deadline of January 31, 2024. More than a thousand companies signed up to set these targets between June 2019 to Oct 2021 via the Business Ambition for 1.5°C Campaign.

Although 40 fashion brands had their commitments removed, those within the scope of our research include **Banana Republic, Gymshark, Gap, Old Navy, Marks & Spencer, Prada, Miu Miu, Mammut and New Look**. The SBTi surveyed companies and of those who had their commitments removed, more than half (54%) cited scope 3 as too much of a challenge, with little more than a third (35%) lacking certainty that the target could be achieved.

(all the products and services that a company buys) and end-of-life treatment of sold products 63% by 2030 and H&M who commits to reduce absolute scope 3 GHG emissions 56% by FY2030 from a FY2019 base year.

This stark finding underscores a critical gap in comprehensive climate action among major brands and highlights the blindingly urgent need for more ambitious commitments. Prioritising long-term targets without setting ambitious scope 3 near-term targets is like planning a marathon without training for it. You may have the finish line in sight, but without daily effort and short-term milestones, you'll never be prepared to cross it.

> Most companies will need to reduce emissions at least 90% to reach net-zero

When it comes to long-term targets, while both net-zero emissions and absolute emissions reduction are important to address climate change, they have different implications and effectiveness. Absolute emissions reduction is more impactful because it involves directly reducing the amount of greenhouse gases (GHGs) emitted into the atmosphere. According to the SBTi Net-Zero standard, most companies will need to reduce emissions at least 90% to reach net-zero. Net-zero is less ambitious than absolute reduction because brands may be reliant on offsetting their emissions rather than actually reducing them. In other words, offsets may create a false sense of progress. There is a great deal of technical terminology when it comes to understanding climate issues. At the end of the day - the most important thing to ask oneself when looking at corporate climate plans are:

1. Does the plan reduce the consumption of fossil fuels?
2. Does it result in a reduction of absolute emissions at the source?

The fact that most brands that disclose long-term, SBTi verified targets have chosen the path of net-zero begs the question: are their decarbonisation plans robust enough to actually reduce their emissions?

The threat of offsets being allowed to count toward corporate climate targets is so concerning that, in July 2024, in an open letter, more than 80 civil society organisations demanded that SBTi reject the use of carbon offsets to meet corporate climate targets. The letter calls on the SBTi and Greenhouse Gas Protocol to continue excluding offsets and stick to scientifically-sound methodologies for tracking corporate climate efforts, because 'offsetting often ends up providing the social licence for high-emitting activities to continue while reinforcing past injustices.'

ON TOP-DOWN APPROACHES, FEASIBILITY AND EQUITY

It is crucial to acknowledge the fact that big fashion's climate targets are often made without consultation with their suppliers, who are expected to achieve brand targets and even set their own. The need for emissions reductions by 2030 and Net Zero by 2050 place enormous pressure on the supply chain.

Transformers Foundation is an organisation representing a unified voice for the denim supply chain. In recent research, they have highlighted supplier sentiments on fashion's climate strategies. Increasingly, suppliers are expected to not only do most of the work to decarbonise but also to fund these efforts, which is often impractical and inequitable. The burden of decarbonisation is disproportionately placed on suppliers in the Global South, which have contributed the least to climate change historically and currently. More on this in section 5: Just Transition & Advocacy.

The current top-down approach to sustainability, where brands dictate terms to suppliers, is deemed ineffective. Transformers Foundation is calling for a collective approach where responsibility and resources are shared across the entire value chain. Importantly, in their view, science based targets often ignore the feasibility and context of different suppliers, particularly those in the Global South. Not all supply chain actors have the same capacity or resources to meet stringent targets, making the current approach inequitable. When putting pressure on brands to achieve climate targets, it is also essential to acknowledge that meeting such goals must be done fairly and feasibly across the supply chain.

ANALYSIS
DECARBONISATION

Major fashion brands' scope 3 emissions are *increasing* rather than decreasing.

Of the nearly half of brands (117 out of 250) with decarbonisation targets, only 105 disclose their progress. Among them, 56 report emissions reductions. Progress is overshadowed, however, by the seven brands reporting increases in scopes 1 and 2 emissions and a concerning 42 brands reporting increases in scope 3 emissions against their baseline year, the most critical area to decarbonise. Against the backdrop of record-breaking heatwaves and the 2030 target for the Paris Agreement threateningly close, it is worrisome to see the emissions of some of the world's largest fashion brands increasing – most of all, at scope 3 level where the most urgent action is needed. Of the brands that disclosed an increase in scope 3 emissions, to the right are some examples of disclosure captured.

Transparency is crucial for assessing brand progress—or the lack thereof. Alarmingly, for 58% of the brands reviewed, their emissions reduction progress remains unclear. These brands either do not disclose an SBTi-approved target, have approved targets but aren't disclosing progress, or, worse yet, do not disclose anything publicly about their decarbonisation efforts. This lack of transparency sends a clear message that major fashion brands are evading accountability for their emissions at a crucial moment to mitigate the worst impacts of the climate crisis. With reports of waves of layoffs in multiple fashion brands including at Authentic Brands Group (i.e. Quiksilver, Billabong, Roxy, Ted Baker), who now own ten brands included in the scope of this research, it is also possible that diminished sustainability teams are not sufficiently resourced to deliver this vital work. A striking example of this is Nike's recent laying off

BRANDS' SCOPE 3 EMISSIONS INCREASING

Brand	Disclosure
Hugo Boss	Emissions have increased 45% against a 2019 baseline, reflecting the "strong business performance of HUGO BOSS since the introduction of 'CLAIM 5'," the name of the brand's business strategy.
lululemon*	The scope 3 emissions have increased by approximately 44% since 2018.
Primark	"This year, there has been an overall increase of 11% in carbon emissions across the value chain compared to our baseline financial year 2018/19. This is as expected: scope 1 and 2 emissions reduced but there was an increase in our scope 3 emissions due to an increase in the volume of materials used to produce the higher number of products sold in the period year-on-year. In the short term, this trend is likely to continue".

* **Note:** lululemon is currently under investigation by the Canadian government for greenwashing by allegedly exaggerating climate action as part of its "Be Planet" marketing campaign.

The following brands also disclose decarbonisation targets but increasing scope 3 emissions:

Adidas
American Eagle
ASOS
Bershka
Brooks Sport
Brunello Cucinelli
Champion
Chloé
COACH
Converse
Diesel
Dr. Martens
Ermenegildo Zegna
Hanes
Hugo Boss
Jack & Jones
JD Sports
Jil Sander
Jordan
Kate Spade
lululemon
Mammut
Marks & Spencer
Marni
Massimo Dutti
Moncler
New Balance
Nike
Primark
Pull&Bear
Sandro
Stradivarius
Target
The North Face
Timberland
UGG
Vans
Vero Moda
Woolworths South Africa
Wrangler
Zalando
Zara

of 20% of their staff working on sustainability issues. This parallels trends observed during the Great Recession and the COVID-19 pandemic where sustainability teams were viewed as optional rather than essential to business operations during periods of declining sales and profits.

> Brands can achieve their goals on paper by updating how they measure emissions rather than by making substantial emission reductions

All in all, this lack of transparency complicates the assessment of true progress, making it difficult to distinguish between genuine emissions reductions and improvements merely on paper. Some brands have reported decreases in their emissions due to updates in their carbon accounting methodologies. For instance, PVH Group, the parent company of Calvin Klein and Tommy Hilfiger, noted a reduction in their scope 3 emissions, citing improvements in data collection and better alignment with carbon accounting practices. While PVH Group is not alone in attributing decreased emissions to refined accounting methods, this highlights a broader issue: brands can achieve their goals on paper by updating how they measure emissions rather than by making substantial emission reductions.

ON CREDIBILITY AND EFFECTIVENESS – OFFSETS AND 'CARBON NEUTRALITY'

OFFSETS

Non-profit organisations in the climate policy space like New Climate Institute have assessed the SBTi and found that the voluntary initiative permits "a significant degree of leniency in the current validation practices', outlining suggestions for improvement.

The SBTi is amidst a review to determine whether or not it will allow usage of carbon offsets to meet scope 3 targets – which will be published later this year. A now rescinded announcement from the SBTi board said that it would allow offsets, but the decision was quickly reversed when the technical staff at SBTi issued a statement rejecting the Board's premature decision, stating that it undermined their Standard Operating Procedure and governance processes.

In summary, although the SBTi continues to be the benchmark for validating corporate targets and a necessary institution to standardise how targets are set and communicated, it's important to hold in mind that brands may rely on loopholes, such as carbon offsets, to meet their goals. Therefore, it is crucial for standard-setting organisations to uphold a high level of integrity in determining what can and cannot be counted towards achieving brands' emission reduction targets.

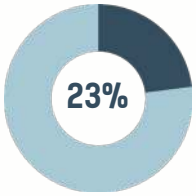
"CARBON NEUTRALITY"

As part of a crackdown on misleading environmental claims, the EU will ban terms such as "climate neutral" or "climate positive" that rely on carbon offsetting by 2026 through its Empowering Consumers for the Green Transition Directive. Under the new directive, only sustainability labels using approved certification schemes will be allowed. This new legislation comes amid widespread concern that brands use carbon offsetting schemes to justify labelling products "carbon neutral", deceiving consumers. Under the Green Claims Directive, green claims based solely on carbon offsetting schemes will remain banned as well. These new legislations will be significant measures against greenwashing.

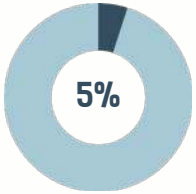
ENERGY CONSUMPTION

FINDINGS

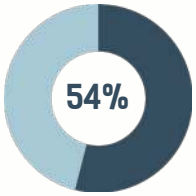
ENERGY CONSUMPTION



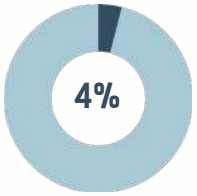
Discloses how the company defines renewable energy



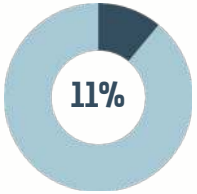
Discloses a breakdown of the energy consumption by country in the supply chain



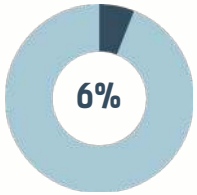
Discloses a breakdown of the energy consumption profile in company's owned and operated facilities



Discloses a breakdown of energy consumption by process in the company's supply chain



Discloses a breakdown of the energy consumption profile in the company's supply chain



Discloses supply chain electricity consumption profile

ANALYSIS

ENERGY CONSUMPTION

The urgency of achieving a just, clean energy transition is paralleled by the critical need for primary data on the energy consumption of major fashion brands, particularly within their supply chains.

The data reveals a significant lack of transparency in the fashion industry regarding the energy consumption and renewable energy use in brands' supply chains. While more than half of the brands disclose energy consumption in their own operations such as stores and offices, there is a stark drop in transparency when it comes to supply chain details. Only a small fraction of brands provide a breakdown by country, process, or disclose their supply chain electricity consumption profiles.

Most brands (95%) do not disclose a breakdown of the energy consumption by country in the supply chain.

The only brands to disclose this information are: American Eagle, Calzedonia, Champion, G-Star Raw, Gildan, Gucci, Hanes, Intimissimi, OVS, Puma, Tezenis and Tom Tailor. G-Star Raw discloses best practice transparency – publishing the energy type, how much energy is consumed across their main sourcing countries and the percentage breakdown by country. From their disclosure, it is understood where the greatest opportunities and challenges may lie in terms of transitioning to clean, renewable energy.

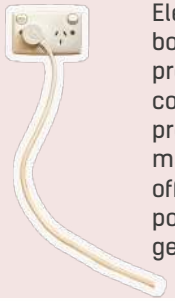
Most brands (96%) do not disclose a breakdown of energy consumption by process in the company's supply chain.

The brands disclosing this information include Calzedonia, Champion, Gildan, Hanes, Hermès, Intimissimi, Lacoste, Puma, Sandro, Tezenis and Wrangler. Interestingly, these retailers are a mix of brands that directly own some or all of their manufacturing, luxury and sportswear. Given that the profile of brands are either those who disclose that they own their factories or who may disclose that they have more of a factory's share of production given the speciality focus of their product, it can be inferred that brands disclosing this information have greater leverage and transparency on this type of information.

Gildan discloses best practice transparency, disclosing how much energy is generated and utilised by various processes with the brand's supply chain. Gildan's disclosure covers processes such as: hosiery manufacturing (398,135 GJ), textile manufacturing (4,377,445 GJ), Integrated manufacturing e.g. textiles and sewing (433,745 GJ), yarn spinning (2,685,859 GJ), sewing operations (238,827 GJ), garment dyeing (221,599 GJ). Transparency on this data point allows brands to identify which areas are the most energy-intensive and target them for efficiency improvements. This information is crucial for developing strategies to reduce overall energy consumption and carbon emissions, contributing to climate goals.

HOW ENERGY IS CONSUMED IN THE SUPPLY CHAIN

Energy use varies at different stages in the supply chain, sometimes known as tiers. Processing facilities, where fabrics are made, are the stage of the garment supply chain that has the biggest carbon footprint because of its reliance on coal. Typically, coal is burnt on-site to heat water which is used in dyeing and printing fabrics.



Electricity is a more prevalent energy source at both the garment factory level and the raw material processing level, where materials like cotton are converted into fibres. Although electrification is preferable to burning coal, the electricity used may still originate from fossil fuels. This can occur offsite through the national grid, which is often powered by coal plants, or onsite through diesel generators and liquefied natural gas.

Coal is commonly burnt on-site at textile mills and other facilities to generate the heat required to dye and process our clothes.

Coal is the most commonly used fuel for thermal energy as it has a high heat content and it is fairly cheap and accessible. However, coal is highly polluting. Burning coal produces more toxic greenhouse gas emissions and air pollution than alternative fuel sources. Phasing out coal could reduce fashion's Tier 1 and 2 emissions by 13%. But we could reduce emissions even further by removing the need for energy-intensive wet dyeing processes alltogether.

Most big fashion brands (94%) do not disclose their supply chain electricity consumption profile.

The brands disclosing this information include Banana Republic, Champion, Converse, Decathlon, Gap, Gildan, Hanes, Jordan, lululemon, Miu Miu, Nike, Old Navy, OVS, Prada, and Puma.

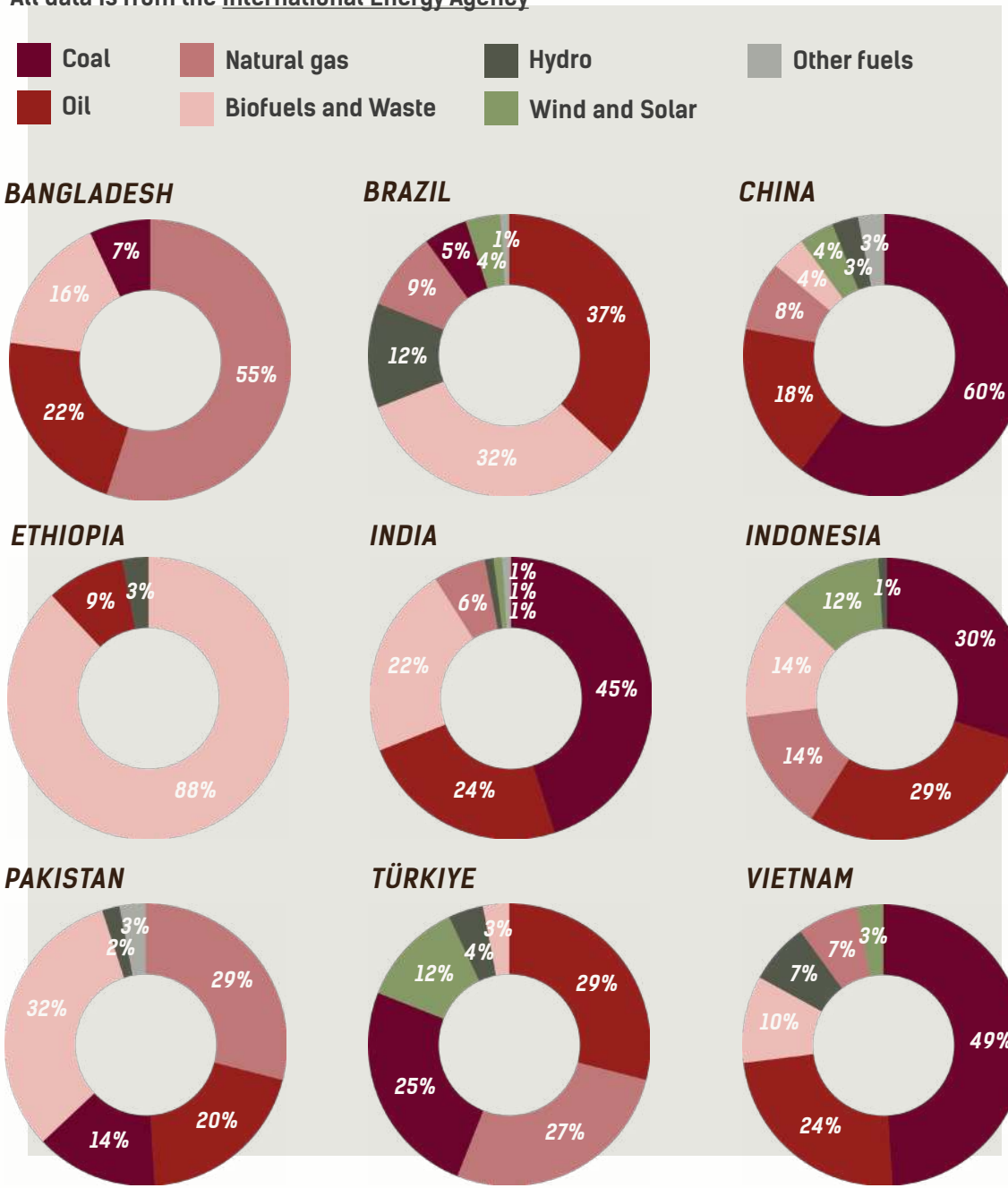
> Greater transparency helps to facilitate accountability and improvements in energy efficiency and renewable energy adoption

Overall, the lack of transparency in how major fashion brands fuel their supply chains obscures the effectiveness of their renewable energy and electricity targets and action plans. Greater transparency in the form of detailed and granular data on energy usage at operations and supply chain level helps to facilitate accountability and improvements in energy efficiency and renewable energy adoption.

To see the energy mix of key garment manufacturing regions, please see the charts to the right.

ENERGY MIX BY COUNTRY

All data is from the International Energy Agency



ANALYSIS

ENERGY CONSUMPTION

A significant majority of major fashion brands and retailers (77%) do not disclose what they mean by renewable energy or how they use it.

From an accountability perspective, we need to know two things:

1. If the brand has a clear definition of renewable energy and if they are transparent about how they account for it in their reporting. This is crucial to understand the criteria and standards brands follow when reporting on renewable energy usage.
2. If the brand discloses its energy consumption breakdown and its procurement methods. This is crucial to understand the brand's actual energy use and to ensure false solutions are not rewarded.

Overall, much-like it is important to understand how brands define what they mean by 'sustainable material' – it is important to also have transparency on what constitutes renewable energy to understand the robustness of brands' efforts and progress toward renewable energy adoption.

The lack of transparency in how brands define renewable energy casts doubt on the credibility of their transition plans. For example, given the urgent global need to phase-out the usage of coal – some brands rely on biomass as a transitional fuel, despite its questionable sustainability. Studies have shown that wood pellets, the most prevalent form of biomass, can generate higher carbon emissions than traditional fossil fuels. This is due to CO2 emissions during cultivation, transportation, and processing, as well as the depletion of carbon stocks caused by deforestation.

An Indonesian biomass project, funded with $9.4 million in green climate funds, is clearing 2,500 hectares of rainforest in Papua, raising deforestation and carbon emission concerns. Critics, including 16 environmental groups, argue that using forest wood for biomass is a "greenwashing tactic" that delays the transition to truly clean energy sources like wind and solar, while exacerbating deforestation and environmental harm.

The urgent need of the fashion industry to phase-out the combustion of coal as soon as possible is underscored by the lack of available options to produce the same level of heat required to manufacture clothes – which is why waterless dyeing technology, dry processing, electrified dyeing via electric boilers and heat pumps are so important. Organisations such as Rainforest Action Network, Transition Asia, and Friends of the Earth Indonesia are calling for the transition away from biomass boilers and the prioritisation of electrification and use of renewable energy to meet thermal energy demands.

It is important to note, however, that there are limitations to what transition pathways are feasible today in different manufacturing regions. In countries like Pakistan who are heavily reliant on natural gas, oil and coal, biomass is deemed to be a viable transition pathway for suppliers and local stakeholders on the ground who are trying to diversify their country's energy mix and transition away from fossil fuels. Crucially, suppliers hold important context and transition pathways should be led by supplier needs, with brand support.

It will not be possible for fashion brands to meet climate targets without clear and credible strategies towards achieving them.

In 2021, the Apparel Impact Institute (Aii) and World Resources Institute (WRI) identified seven solutions the fashion industry must adopt to stay within the 1.5°C pathway by 2030. The good news is that their research indicates that 45% of the necessary emissions reductions by 2050 can be achieved with existing solutions, including: renewable electricity, scaled-up sustainable materials and processes, energy efficiency, and phasing-out burning coal.

This year, we asked brands for transparency on several crucial key targets aligned with these existing solutions, including:

- Discloses a renewable energy target for the supply chain and progress against this target
- Discloses a renewable electricity target for the supply chain
- Discloses target to phase-out combustion of thermal coal (or other fossil fuels) and progress against this target
- Discloses target to electrify all energy-intensive processes in textile and garment manufacturing where feasible and progress against this target

Why we need a coal phase-out:

Coal is the most carbon-intensive fossil fuel, emitting substantial CO2 levels into the atmosphere, driving global warming, and severely polluting the air—a link established since the late 19th century.

This issue significantly impacts those working in clothing production. Research reveals that burning coal in textile factories releases numerous harmful chemicals into the air. One study found that air pollution from burning coal causes about 20,000 premature deaths annually in Southeast Asia, where many of our clothes are made. Alarmingly, deaths linked to coal emissions are projected to triple by 2030, reaching 70,000 per year. The immense human and environmental cost of coal production underscores the urgency in which it needs to be phased-out.

In 2023, we looked for transparency on what proportion of fashion brands' production is powered by coal, including which geographies and sectors are affected and just 6% of brands disclosed this information.

ANALYSIS

ENERGY CONSUMPTION

A mere 14% of big fashion brands disclosed commitments to phasing out coal, severely hindering progress toward global climate targets.

This year, instead, we are asking for transparency on whether or not brands disclose a time-bound and measurable target to phase-out combustion of thermal coal in their supply chain. Our research reveals a worryingly low level of brands disclosing this commitment – with just 35 out of 250 brands disclosing this information. This is particularly concerning given the ongoing prevalence of coal in major production countries (as shown in the energy mix by country charts on page 57). Without widespread commitment to coal phase-out, it will not be possible to meet overall progress toward global climate targets. Thermal coal combustion is a major contributor to CO2 emissions, and its continued use poses a significant threat to efforts aimed at mitigating climate change.

Coal consumption in fashion's supply chain is fuelling environmental breakdown and human rights impacts

Decathlon plans to phase-out coal consumption at their Rank 1 production sites by 2025 and their Rank 2 production sites by 2030. Decathlon is the only brand that is transparent with regard to the amount of coal it consumes (in tonnes). Decathlon's Rank 1 (contracted directly by Decathlon for products and materials) and Rank 2 (supplying materials to Rank 1 suppliers, indirectly supporting Decathlon) suppliers consume in total 528,524 tonnes of coal per year. To put that into perspective, an average truck can hold 40 tonnes of coal. So, to meet the energy demand here, one would need about 13,213 trucks full of coal. Significantly, other research indicates that just one processing facility in lululemon's supply chain reports consuming 22,000 tonnes or about 734 trucks full of coal in one year.

Coal consumption in fashion's supply chain is fuelling environmental breakdown and human rights impacts. These two brand examples highlight the vast amount of coal required to produce clothing globally each year. This is particularly concerning for countries like Vietnam, where coal accounts for 49% of the country's energy mix. With 16% of Vietnam's GDP dependent on textile and apparel production and 40% of this production exported to the United States, the reliance on coal is substantial. In Vietnam, coal is used primarily for onsite thermal heat in textile factories, as well as electricity from coal-power plants.

UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE (UNFCCC) COAL PHASE-OUT

Brand signatories to the UNFCCC are committed to phasing out coal as soon as possible, or by 2030 at the latest. However, we observed that some of these signatory brands do not publicly disclose their targets on their websites or in their reports. We reached out to all brands, emphasising the necessity of explicitly disclosing these targets on their brand websites or reports. In cases where a time-bound target was not explicitly provided, we accepted a public disclosure that, as UNFCCC signatories, they commit to a coal phase-out by 2030 at the latest, with a link to the UNFCCC.

Despite being UNFCCC signatories, some brands including Bonprix and Hugo Boss disclosed their targets publicly for the first time in response to our request. Others indicated they were unprepared to disclose their own brand-level targets, and some did not respond at all. While multi-stakeholder initiatives like the UNFCCC provide a platform for collective action, they can also become safe harbours of inaction, allowing brands to more easily evade accountability.

"For every sustainability claim we see, we need to ask one fundamental question. Does this actually make an impact on reducing emissions, ditching fossil fuels or scaling up renewable energy? If not, the Earth simply cannot tell the difference.

Ruth MacGilp
Fashion Campaign Manager
Action Speaks Louder

Most (92%) of brands do not disclose a time-bound and measurable renewable electricity target for the supply chain – a crucial cornerstone of any climate action plan.

Whilst there are many industry-specific actions required, transitioning to renewable electricity is the cornerstone of all other initiatives. Transitioning to renewable electricity across a company's supply chain has the potential to cut emissions in the fashion industry by as much as 27%, according to the Apparel Impact Institute.

WHAT IS RENEWABLE ELECTRICITY?

Renewable electricity, generated from natural, carbon-free resources such as wind and solar, is a high-quality, sustainable alternative to fossil fuels like coal and natural gas. Projects can be off-site, feeding into the grid, or on-site, such as rooftop solar installations, which are cost-effective and established in many regions. The cost of solar energy has dropped significantly, with prices decreasing over 80% from 2010 to 2020, making it cheaper than conventional fossil fuels in many cases.

Why does a brand need both a renewable energy target and a renewable electricity target?

A renewable electricity target without a renewable energy target means that only the electricity used by the company is being sourced from renewable resources, while other energy forms such as heating, cooling, and transportation fuels may still rely on fossil fuels.

In other words, 100% renewable electricity ≠ 100% fossil fuel free

This approach limits the overall impact of reducing greenhouse gas emissions and doesn't address the company's entire energy footprint, thereby undermining comprehensive action. Having both targets is important to enhance credibility and transparency, drive market demand, and align with long-term climate goals. This dual focus supports robust corporate sustainability strategies and demonstrates a genuine commitment to addressing the climate crisis across all aspects of energy use.

Targeting for 100% renewable energy in manufacturing clearly shows that renewable energy is a key factor in a brand's purchasing decisions. This encourages manufacturers, governments, and competitors to prioritise clean energy. It also signals to garment-producing countries that there is a demand for clean energy, helping them shift towards renewable sources where it's most needed.

Just one brand discloses a time-bound and measurable target to electrify all energy intensive manufacturing processes in their supply chains.

Energy-intensive manufacturing processes are significant contributors to greenhouse gas emissions. Electrifying these processes with renewable energy is crucial for reducing carbon footprints. Without targets, brands may continue relying on fossil fuels, undermining efforts to combat climate change.

Under an accelerated emissions reduction scenario, energy efficiency and energy transition levers could cut around 1 billion tonnes of GHG emissions in 2030 across the value chain. Around 45% of savings can be derived from efficiency improvements in raw material production, preparation and processing, while 39% will be associated with the transition to renewable energy. The remaining 16% could be delivered by switching from coal energy boilers to electric boilers for synthetic material production.

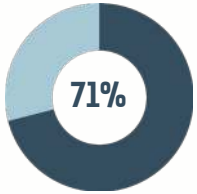
Further, setting clear targets can drive innovation and investment in new technologies. Brands that fail to establish these goals might miss out on advancements that could make their operations more efficient.

Canada Goose was the only brand that disclosed any information regarding electrification. Although they do not explicitly disclose a target for 100% electrification, they disclose that they "expect to take on two to three sites per year to achieve their 2025 Net Zero Carbon Target."

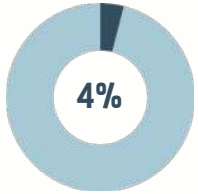
GREENHOUSE GAS FOOTPRINT

FINDINGS

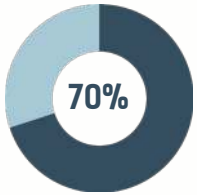
GREENHOUSE GAS (GHG) FOOTPRINT



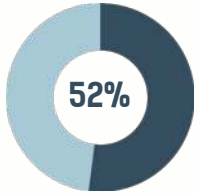
Explains what is included in the company's scopes 1, 2 and 3 emissions



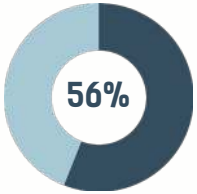
Discloses a breakdown of scope 3 emissions by country, volume and emission type



Publishes annual carbon footprint or GHG emissions in scopes 1&2/ owned and operated facilities



Publishes annual value chain/carbon footprint at a raw material level, with estimations for downstream impacts



Publishes annual value chain/scope 3 carbon footprint, focusing on detailed calculations on GHG emissions in the supply chain

ANALYSIS

GREENHOUSE GAS FOOTPRINT

Brands are not tracking their emissions down to the raw material level therefore they cannot accurately measure their climate impacts.

While the Greenhouse Gas (GHG) Protocol provides a widely accepted framework for categorising emissions into three scopes, the actual implementation and interpretation can vary between companies. As a result, there is no standard for how companies identify their emission sources and categorise them into scopes. Therefore, understanding how brands define their different scopes is crucial in order to hold them accountable for reducing emissions. These scopes categorise and organise emissions based on their source and the level of direct connection to the brand.

According to our research, 71% of the world's largest fashion brands disclose what is included in their scopes which enables scrutiny of their decarbonisation claims. For example, if a brand's target only includes scopes 1 or 2 or they do not include purchased goods and services in their scope 3 calculations, brands ultimately fail to account for their greatest environmental impacts.

Overall increase in disclosure on GHG emissions may be due to increased pressure from stakeholders such as civil society, investors and policymakers

What is the level of transparency on their emissions across the different supply chain scopes?

Scopes 1 & 2

Emissions in scope 1 and 2 (under direct brand control) only account for approximately 3% – 5% of an organisation's total GHG emissions and in some cases, it could be as little as 0.3%, as is the case for lululemon (pg.50). According to our data, nearly three quarters of the world's biggest fashion brands disclose this information (71%). This overall increase in disclosure on GHG emissions compared to 64% last year may be due to increased pressure from stakeholders such as civil society, investors and policymakers to disclose this data in order to mitigate brands' environmental impacts. Although reducing scope 1 and 2 emissions is important, it reflects only a small proportion of big fashion's overall footprint.

Scope 3

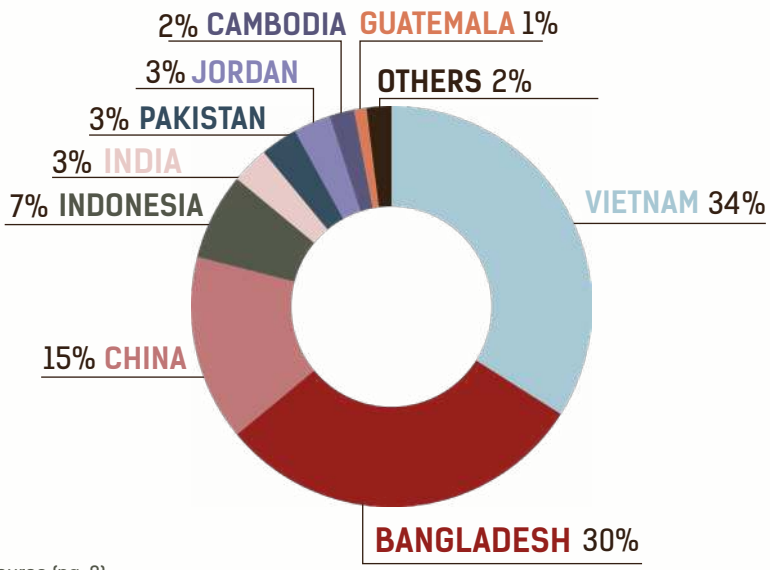
Scope 3 usually represents a brand's most significant greenhouse gas impact, highlighting the most critical area of need. In the fashion industry, on average, 96% of emissions stem from scope 3 across fashion brands with approved Science Based Targets (SBTs). Within scope 3 emissions, more than 80% come from upstream emissions – i.e. all the products and services a company buys. The remaining 20% come from downstream emissions i.e. the emissions associated with the use, disposal and end-of-life treatment of a company's products and services.

The data shows that a little more than half (56%) of brands disclose their scope 3 carbon footprint. Scope 3 emissions reduction is where the greatest needs lie and yet, six years out from the global 2030 Paris target, 110 of the world's biggest brands still do not disclose this information. There is a chance that they are tracking it and choosing not to disclose it or worse yet, they are not tracking it at all. Given the urgency required to reduce emissions 55% by 2030, it is important to know where the greatest challenges lie geographically.

According to our data, just 4% of brands (11/250) disclose their scope 3 emissions by country, volume and emission type. Transparency of this information helps identify specific areas or regions where emissions are highest. The brands disclosing this information include: American Eagle, Balenciaga, Bottega Veneta, Champion, G-Star Raw, Gucci, Hanes, JD Sports, lululemon, OVS, and SAINT LAURENT. OVS demonstrates best practice transparency by also disclosing the percentage of emissions in each country. For example, they publish that 58% of their scope 3 emissions footprint occurs in Bangladesh. This helps in targeting efforts to reduce emissions more effectively, focusing on the most significant sources first. It also signals where the brands' greatest responsibility lies. This is information brands may hold internally but public disclosure on this helps enable collaborative efforts to reduce emissions across the value chain and encourages shared responsibility for climate action.

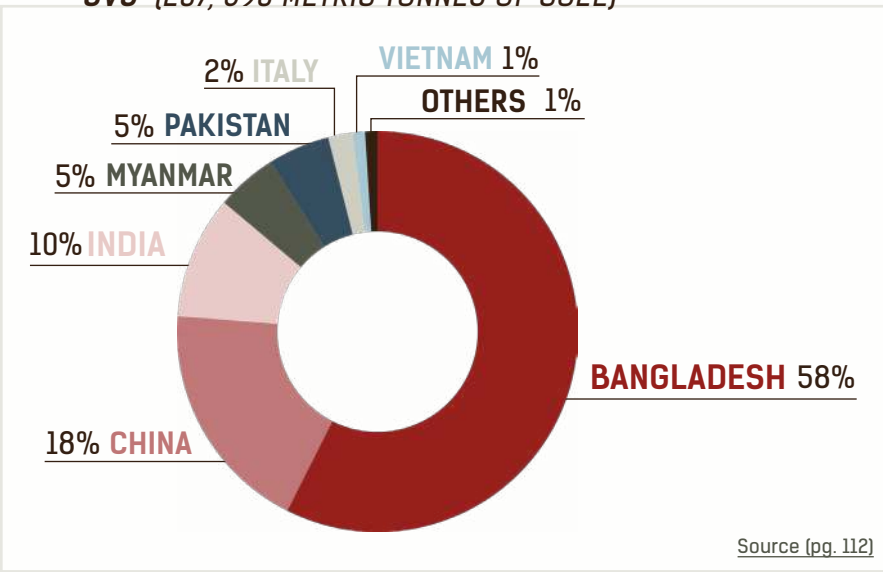
EMISSIONS BREAKDOWN BY COUNTRY

AMERICAN EAGLE (154, 517 METRIC TONNES OF CO2E)



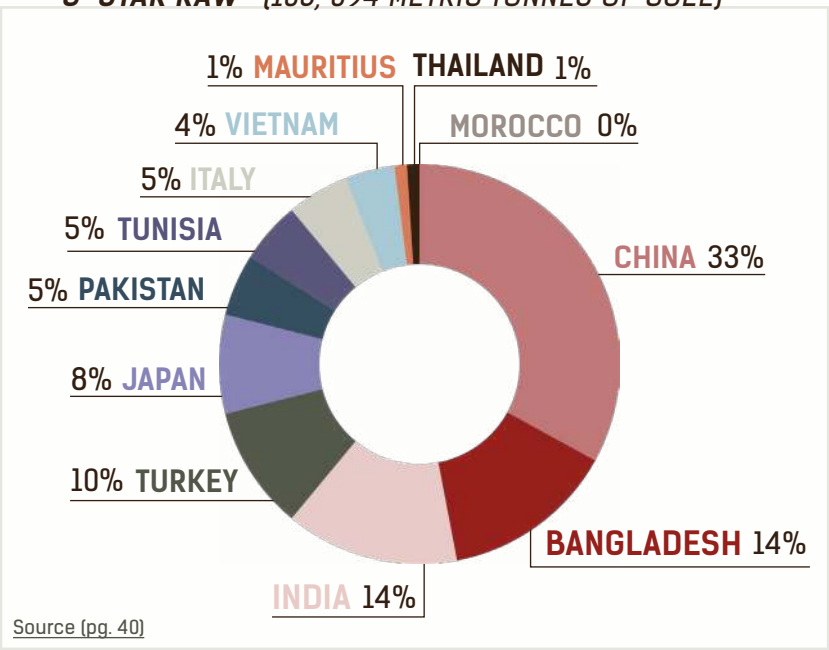
Source (pg. 8)

OVS (267, 596 METRIC TONNES OF CO2E)



Source (pg. 112)

G-STAR RAW (103, 094 METRIC TONNES OF CO2E)



Source (pg. 40)

ANALYSIS

GREENHOUSE GAS FOOTPRINT

Scope 3: Purchased Goods and Materials (Raw Materials)

Finally, the most hidden areas of the supply chain are at the raw material level, which includes purchased goods and services. This category encompasses all emissions from producing raw materials to processing fibres and manufacturing the clothes we wear. While slightly more than half (52%) of brands disclose their emissions at the raw material level, nearly half do not.

> Lack of transparency can lead to missed opportunities for innovation, collaboration and efficiency

Without this critical information, a significant portion of a company's overall carbon footprint and environmental impact remains unknown. This lack of transparency can lead to missed opportunities for innovation, collaboration and efficiency. Ultimately, if major brands do not track carbon emissions throughout the supply chain down to the raw material level, they cannot accurately measure their climate impacts. And importantly, without this information publicly disclosed, it is harder to hold big fashion accountable for reducing its emissions.

Collecting accurate data on greenhouse gas emissions (GHG) is crucial in order for brands and retailers to reduce emissions and meet their decarbonisation targets. However, achieving these reductions requires a clear and consistent approach to emissions tracking.

Major brands and retailers should focus on reducing their GHG emissions in absolute terms rather than based on intensity reduction. This means reducing their overall GHG emissions rather than their emissions per revenue. Brands only pursuing intensity-based emissions reductions may result in an increase in their overall emissions (as long as their emissions increase less than their revenue increases each year). Big fashion's emissions tracking is inconsistent and muddled – and this won't be fixed soon. As better data and potential regulations emerge, fashion brands are updating their carbon footprint calculations – and it is crucial that any updates in accounting methods are robust. In the meantime, the inconsistency makes it hard to gauge their progress or lack thereof.

SCRUTINY TIP: BASELINE YEARS & CANCELLED ORDERS

When assessing the robustness of brand targets, it is important to consider the baseline year—the starting point a company uses to measure its greenhouse gas emissions. Best practice is to use a 2018 baseline year to reflect pre-COVID stability. Baselines from 2019-2020 fail to accurately represent typical economic activity due to significant disruptions caused by the COVID-19 pandemic.

When fashion brands cancel orders due to force majeure events – most notably the example of the COVID-19 pandemic, the emissions from already produced goods still enter the atmosphere. These emissions often go unreported in standard carbon accounting because practices focus on completed transactions and marketed products. Consequently, emissions from cancelled orders are not captured in official reports, despite their environmental impact.

The Greenhouse Gas Protocol, a widely used standard for carbon accounting (i.e. the act of tracking emissions), emphasises scopes 1, 2, and 3 emissions from direct and indirect activities controlled by the reporting entity e.g. the fashion brand in this case. Emissions from products that never reach the market due to cancelled orders typically fall outside these traditional accounting boundaries.

Critically, there may be future unjust cause for brands to repeat the mistakes made during COVID-19 and cancel orders en masse due to the increased frequency of climate hazards. Accounting loopholes such as not counting products already made enable brands to wipe their hands clean when tragedy occurs. For more on just transition and climate hazards, see pg. 88.

ENERGY PROCURE-MENT

APPROACH

WHAT THIS SECTION COVERS

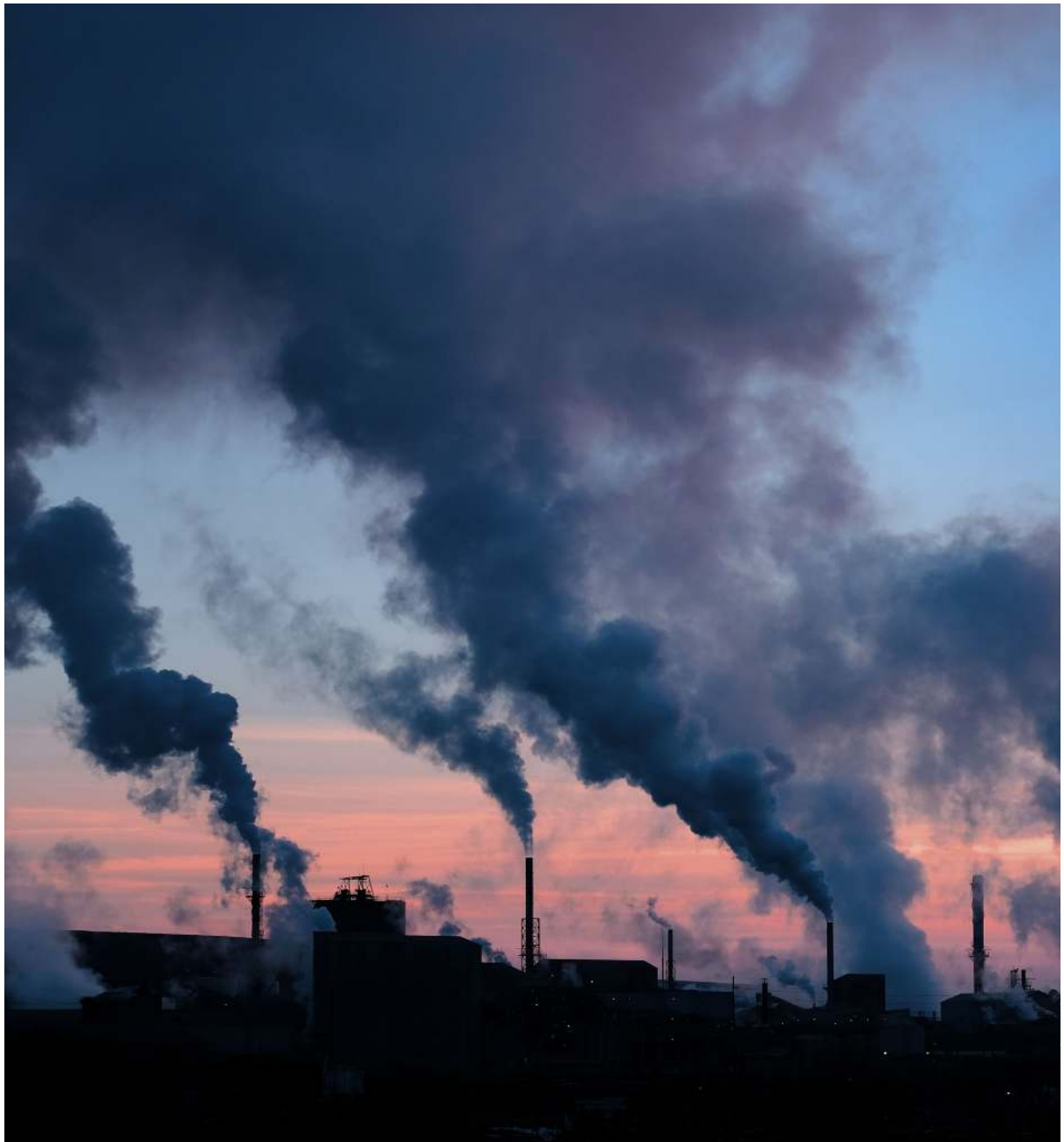
What are fashion brands revealing about how they buy renewable energy, their use, and how effective and impactful their approaches are?

In this section, we try to understand major fashion brands' progress on adopting renewable energy through their commitment to the RE100 initiative – a global corporate pledge to 100% renewable energy.

We are also looking to assess the transparency levels and detail of their energy procurement strategies for both owned facilities and supply chains. This includes examining the types of procurement methods used and how robust and credible these approaches are.

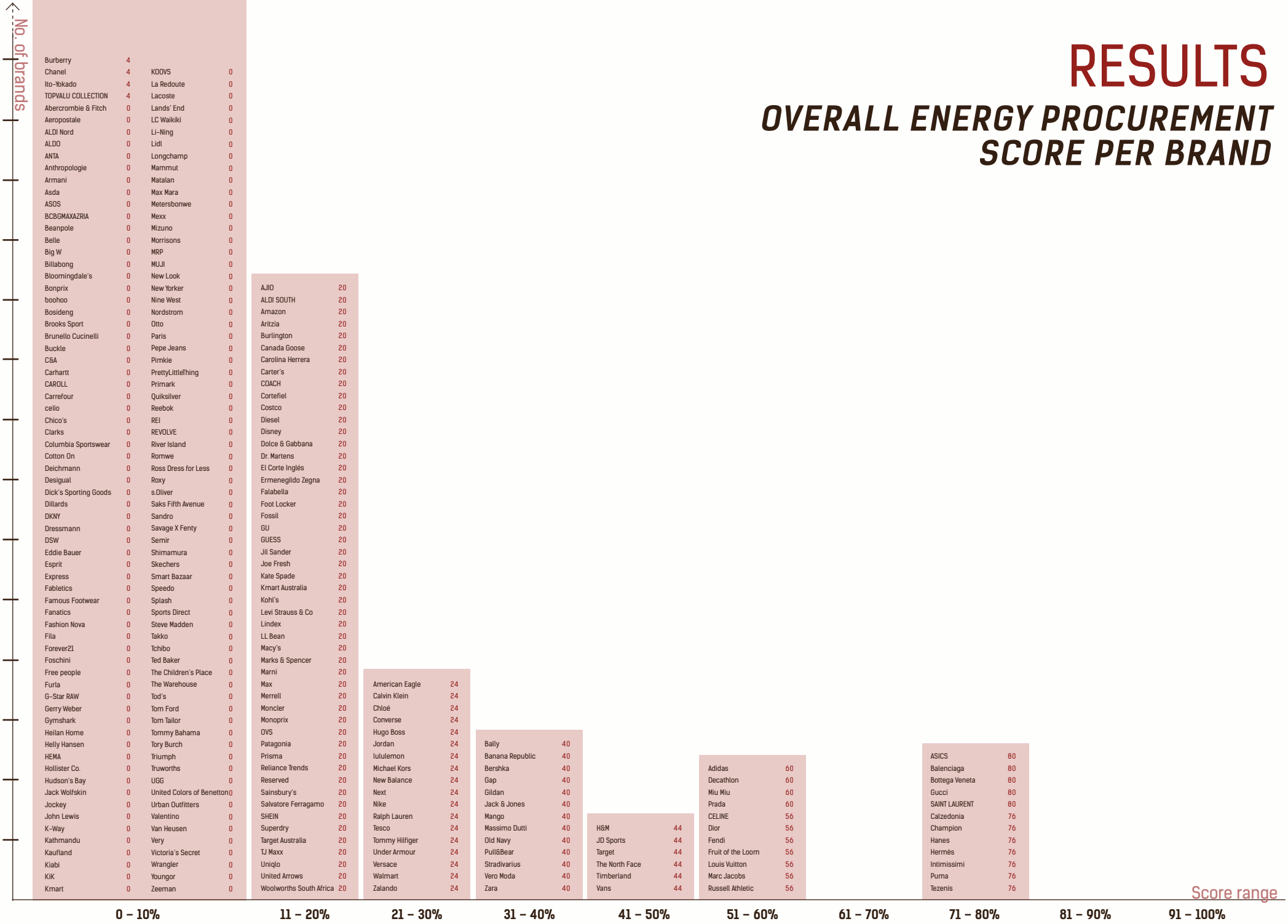
Alongside this, we are also evaluating the level of transparency on the scope and scale of renewable energy use and production in the supply chain by looking at the percentage of electricity consumption that is matched to renewable energy both annually and hourly – also known as 24/7 hourly matching.

Finally, we are looking at brands' future plans for renewable electricity procurement and what specific constructs they are pursuing, alongside what other measures they are seeking to support renewable electricity procurement in their supply chains.



RESULTS

OVERALL ENERGY PROCUREMENT SCORE PER BRAND



0 – 10%			
Burberry	4	KOOVS	0
Chanel	4	La Redoute	0
Ito-Yokado	4	Lacoste	0
TOPVALU COLLECTION	4	Lands' End	0
Abercrombie & Fitch	0	LC Waikiki	0
Aeropostale	0	Li-Ning	0
ALDI Nord	0	Lidl	0
ALDO	0	Longchamp	0
ANTA	0	Mammut	0
Anthropologie	0	Matalan	0
Armani	0	Max Mara	0
Asda	0	Metersbonwe	0
ASOS	0	Mexx	0
BCBGMAXAZRIA	0	Mizuno	0
Beanpole	0	Morrisons	0
Belle	0	MRP	0
Big W	0	MUJI	0
Billabong	0	New Look	0
Bloomingdale's	0	New Yorker	0
Bonprix	0	Nine West	0
boohoo	0	Nordstrom	0
Bosideng	0	Otto	0
Brooks Sport	0	Paris	0
Brunello Cucinelli	0	Pepe Jeans	0
Buckle	0	Pimkie	0
C&A	0	PrettyLittleThing	0
Carhartt	0	Primark	0
CAROLL	0	Quiksilver	0
Carrefour	0	Reebok	0
celio	0	REI	0
Chico's	0	REVOLVE	0
Clarks	0	River Island	0
Columbia Sportswear	0	Romwe	0
Cotton On	0	Ross Dress for Less	0
Deichmann	0	Roxy	0
Desigual	0	s.Oliver	0
Dick's Sporting Goods	0	Saks Fifth Avenue	0
Dillards	0	Sandro	0
DKNY	0	Savage X Fenty	0
Dressmann	0	Semir	0
DSW	0	Shimamura	0
Eddie Bauer	0	Skechers	0
Esprit	0	Smart Bazaar	0
Express	0	Speedo	0
Fabletics	0	Splash	0
Famous Footwear	0	Sports Direct	0
Fanatics	0	Steve Madden	0
Fashion Nova	0	Takko	0
Fila	0	Tchibo	0
Forever21	0	Ted Baker	0
Foschini	0	The Children's Place	0
Free people	0	The Warehouse	0
Furla	0	Tod's	0
G-Star RAW	0	Tom Ford	0
Gerry Weber	0	Tom Tailor	0
Gymshark	0	Tommy Bahama	0
Heilan Home	0	Tory Burch	0
Helly Hansen	0	Triumph	0
HEMA	0	Truworths	0
Hollister Co.	0	UGG	0
Hudson's Bay	0	United Colors of Benetton	0
Jack Wolfskin	0	Urban Outfitters	0
Jockey	0	Valentino	0
John Lewis	0	Van Heusen	0
K-Way	0	Very	0
Kathmandu	0	Victoria's Secret	0
Kaufland	0	Wrangler	0
Kiabi	0	Youngor	0
KiK	0	Zeeman	0
Kmart	0		

11 – 20%	
AJIO	20
ALDI SOUTH	20
Amazon	20
Aritzia	20
Burlington	20
Canada Goose	20
Carolina Herrera	20
Carter's	20
COACH	20
Cortefiel	20
Costco	20
Diesel	20
Disney	20
Dolce & Gabbana	20
Dr. Martens	20
El Corte Inglés	20
Ermenegildo Zegna	20
Falabella	20
Foot Locker	20
Fossil	20
GU	20
GUESS	20
Jil Sander	20
Joe Fresh	20
Kate Spade	20
Kmart Australia	20
Kohl's	20
Levi Strauss & Co	20
Lindex	20
LL Bean	20
Macy's	20
Marks & Spencer	20
Marni	20
Max	20
Merrell	20
Moncler	20
Monoprix	20
OVS	20
Patagonia	20
Prisma	20
Reliance Trends	20
Reserved	20
Sainsbury's	20
Salvatore Ferragamo	20
SHEIN	20
Superdry	20
Target Australia	20
TJ Maxx	20
Uniqlo	20
United Arrows	20
Woolworths South Africa	20

21 – 30%	
American Eagle	24
Calvin Klein	24
Chloé	24
Converse	24
Hugo Boss	24
Jordan	24
lululemon	24
Michael Kors	24
New Balance	24
Next	24
Nike	24
Ralph Lauren	24
Tesco	24
Tommy Hilfiger	24
Under Armour	24
Versace	24
Walmart	24
Zalando	24

31 – 40%	
Bally	40
Banana Republic	40
Bershka	40
Gap	40
Gildan	40
Jack & Jones	40
Mango	40
Massimo Dutti	40
Old Navy	40
Pull&Bear	40
Stradivarius	40
Vero Moda	40
Zara	40

41 – 50%	
H&M	44
JD Sports	44
Target	44
The North Face	44
Timberland	44
Vans	44

51 – 60%	
Adidas	60
Decathlon	60
Miu Miu	60
Prada	60
CELINE	56
Dior	56
Fendi	56
Fruit of the Loom	56
Louis Vuitton	56
Marc Jacobs	56
Russell Athletic	56

61 – 70%

71 – 80%	
ASICS	80
Balenciaga	80
Bottega Veneta	80
Gucci	80
SAINT LAURENT	80
Calzedonia	76
Champion	76
Hanes	76
Hermès	76
Intimissimi	76
Puma	76
Tezenis	76

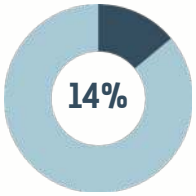
81 – 90%

91 – 100%

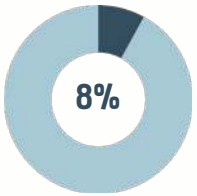
* Brands ranked in alphabetical order by score out of 22.5 possible points in this section, but shown as rounded-up percentage.

FINDINGS

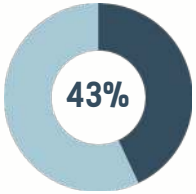
ENERGY PROCUREMENT



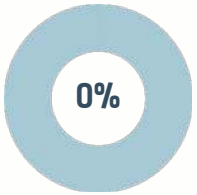
Discloses commitment to RE100



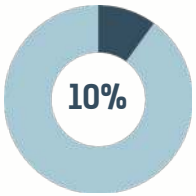
Discloses share/ percentage of supply chain electricity consumption matched to renewable generation on an annual basis



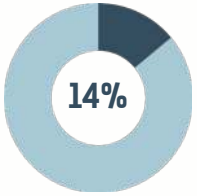
Discloses a procurement strategy and/or detailed breakdown of procurement type in their company's owned and operated facilities



Discloses share/ percentage of supply chain electricity consumption matched on an hourly basis – also known as a 24/7 hourly matching



Discloses a procurement strategy and/or detailed breakdown of procurement type in their company's supply chain



Discloses details on the renewable electricity constructs it plans to pursue to meet its future renewable electricity target or any other measures to support renewable electricity procurement in the supply chain

ANALYSIS
ENERGY PROCUREMENT

Energy procurement is a lens to assess the effectiveness of wider decarbonisation strategies

The ways in which major brands and retailers buy their energy (i.e. their procurement strategy) and the mechanisms they use to report it (Renewable Energy Credits, Power Purchase Agreements, onsite generation) define whether or not their renewable energy strategies are actually leading to absolute carbon reduction. Fashion brands have varying levels of effectiveness in their renewable electricity strategies, making transparency about their commitments, procurement strategies, and future plans crucial for assessing effectiveness.

This report does not provide a detailed brand-by-brand analysis but aims to highlight key information such as:

- Type of renewable electricity/supply construct (such as PPA, utility contract...)
- Location of renewable electricity generation capacity for each construct
- Volume of electricity procured through each construct
- The percentage of electricity demand covered by the construct
- For PPAs, agreements regarding the bundling (or cancellation) of any associated certificates

For the 250 brands within our research scope, detailed information was often scarce or missing from public sources. While some details were available in CDP (formerly Carbon Disclosure Project) reports, overall transparency was limited. Therefore, for this initial exploration, we accepted a range of disclosures. For example, we awarded points if brands were at least transparent about the constructs they used, such as on-site generation, Power Purchase Agreements (PPAs), or Renewable Energy Credits (RECs).

Some major fashion brands (14%) are committing to 100% renewable electricity in their own operations through the RE100 initiative

Last year, for the first time, we measured which brands were committed to sourcing 100% renewable electricity across their own operations (scopes 1 and 2) through membership to the RE100 initiative. RE100, led by the Climate Group in partnership with CDP (formerly the Carbon Disclosure Project), is a global effort to accelerate the transition to a zero-carbon economy by encouraging companies to commit to 100% renewable electricity. This initiative facilitates the sharing of best practices, setting of ambitious energy goals, and showcasing of corporate leadership. The RE100 technical criteria defines renewable energy as wind, solar, geothermal, 'sustainably sourced biomass' (excluding biogas) and 'sustainable hydropower'.

Notably, last year, 12% of brands disclosed their commitment, increasing to 14% this year – a positive increase that shows growing commitment to renewable energy and membership which signals a robust demand for renewable energy, driving market changes that favour investments in this sector. Additionally, while there are other initiatives similar to RE100, such as the Clean Energy Buyers Association (CEBA) we prioritise RE100 due to its global reach, rather than a focus on a single geography.

Only 43% of brands are transparent about energy procurement in their operations, and a mere 10% for their supply chains, complicating the assessment of decarbonisation efforts.

Not all procurement constructs are equal – there is a clear hierarchy in terms of effectiveness. Transparency of renewable energy procurement strategies is crucial to understanding how brands are decarbonising their operations and supply chains, as well as the accounting mechanisms they are using.

> Renewable Energy Credits (RECs) offer minimal impact on actual renewable energy generation and often lack a direct link to where it is consumed

The renewable energy procurement hierarchy prioritises on-site solar panels and new local grid installations through Power Purchase Agreements (PPAs) because they directly add renewable capacity and support the local grid. In contrast, Renewable Energy Credits (RECs) are at the bottom of the mitigation hierarchy, offering minimal impact on actual renewable energy generation and often lacking a direct link to where it is consumed.

Major brands and retailers, irrespective of their procurement strategies, should strive to minimise energy consumption across all levels of their value chains to achieve significant reductions in emissions. Additionally, they should prioritise energy procurement methods that genuinely contribute to increasing renewable energy on local grids, rather than depending on RECs, which do not effectively promote the production or consumption of renewable energy.

RENEWABLE ENERGY PROCUREMENT METHODS DEFINED

Procurement construct	Description	Effectiveness
Self-generation	Producing renewable energy on-site rather than purchasing it from external suppliers. It can take the form of: • Solar panels • Wind turbines • Other renewable technologies installed on company premises Self-generation allows brands to directly control and utilise renewable energy, contributing to a reduction in their overall carbon footprint and helping to ensure a more sustainable energy supply chain.	High
Power Purchase Agreements (PPA)	Power Purchase Agreement (PPA) is defined as a contract between a company and a renewable energy producer, where the company agrees to purchase electricity directly from the producer. This arrangement often involves the development of new renewable energy projects and contributes to the expansion of renewable capacity. PPAs are typically considered higher quality procurement instruments because they are more likely to result in the generation of additional renewable energy and are often tied to specific projects and locations, ensuring a direct link between energy production and consumption.	High
Standalone and/ or unbundled Energy Attribute Certificates(EACs) / **Renewable Energy Credits** (RECs)	A 'bundled' REC (Renewable Energy Credit) is sold together with the actual electricity produced from a renewable source. This means when you buy the electricity, you also get the certificate verifying that the electricity is renewable. One REC represents 1 MWh of renewable electricity. Less effective still is an unbundled REC which is sold separately from the actual electricity. You can buy the certificate even if the electricity you are using comes from non-renewable sources. The certificate alone claims that a certain amount of renewable energy was generated somewhere, but it doesn't mean that the electricity you are consuming is directly from renewable sources.	Low

ANALYSIS
ENERGY PROCUREMENT

Major fashion brands and retailers report purchasing unbundled renewable energy credits to offset emissions at both own operations and supply chain level, creating an unclear picture of progress against climate targets

Brands use different procurement methods to certify the generation of electricity from specific sources. Brands may purchase Renewable Energy Credits (RECs), which are known under various names, such as Guarantees of Origin (GOs) and Energy Attribute Certificates (EACs).

> Both buyers and grid users may think they are using renewable electricity, which leads to double-counting and misleading data

Big fashion brands may claim to be reducing their emissions by purchasing RECs. These are certificates that brands can buy to claim they are using renewable electricity, even if the actual electricity they consume comes from dirty sources (like coal). RECs are considered poor quality because there is often a very weak or no physical link between the grid where the RECs were generated and where the renewable electricity is claimed. For example, brands could be purchasing RECs for wind-powered electricity produced in Norway to offset coal-powered electricity in Vietnam.

Buying RECs in one place doesn't signal demand where the electricity is actually used, so both buyers and grid users may think they are using renewable electricity, which leads to double-counting and misleading data.

RECs allow fashion brands to claim to use renewable energy even if their actual carbon emissions remain the same or worse still, their emissions increase as the fashion industry continues to grow. RECs as an accounting tool are a necessary complement to short and long-term procurement contracts for renewable electricity, like PPAs. However, it is common for brands to treat RECs as a procurement method for renewable electricity. Ultimately, RECs are a false solution, helping brands play the system. Used on their own, RECs do not reduce the use of energy generated by fossil fuels or limit their production. It's like sweeping dust under the rug; it may look better, but doesn't actually clean the house.

> RECs are a false solution, helping brands play the system

TRANSPARENCY OF BRANDS' REC USAGE

Brand	Disclosure
American Eagle	"RECs account for 23% of electricity usage"
Carter's	"Purchased 14,000 RECs that were applied to our 2022 emissions – 2024 purchased 10,000 RECs that will be applied to 2023 emissions"
VF Corp ***(The North Face, Timberland, Vans)***	"VF contracts with utilities to purchase the energy attribute certificates we retire in our name. The EACs come from various generation origins represented by the generation mix. Because the certificates may originate in more than one place, we cannot determine the commissioning year of the energy generation facility."

Please note: American Eagle and VF Corp's scope 3 Emissions have increased; Carter's does not disclose an SBTi approved scope 3 target so it is unclear whether their emissions have increased or decreased.

BRANDS' DISCLOSURE OF POWER PURCHASE AGREEMENTS (PPAS)

Brand	Disclosure
El Corte Inglés	"El Corte Inglés Group has entered into two long-term renewable energy agreements (power purchase agreement or PPAs) with NoyFund and Eranovum. The energy covered by these two PPAs comes from photovoltaic plants in Cuenca, with approximately 330 MW of combined installed capacity and the ability to produce slightly over 650 GWh/year of power. In line with our environmental strategy, we are also committed to having our energy come exclusively from renewable sources, free of CO2 emissions and with CoGs (guarantees of origin). To complement our consumption from renewable sources, we purchase green certificates in PPAs, thereby reaching 100% zero-emission supplies in Spain."
H&M	"In 2023, we sourced renewable electricity equal to 94% of the group's total electricity use. When we procure standalone Energy Attribute Certificates (EACs), we focus on the lowest-impact sources — primarily wind and solar. All our EAC purchases comply with the RE100 technical criteria. In addition to increasing the share of renewable electricity, we are also committed to procure in more impactful ways. For example, we are signing PPAs directly with developers of solar parks or wind farms. To date, we have signed five PPAs in Europe for solar parks in the UK, Spain and Sweden. The first one, in the UK, started delivering electricity in December 2022. This means we have secured a capacity of 240MW of renewable electricity in total, which will result in an indicative annual output of 370 GWh, corresponding to more than a quarter of yearly electricity use in our own operations. In addition, we have installed solar panels on some of our warehouses to increase renewable electricity generation."
Hanes	"We recently signed a purchase power agreement to source solar power for our energy-intensive textile facility in the Dominican Republic. This facility is now powered by 100% renewable electricity. We also implemented direct invest solar systems at facilities in Honduras and Thailand."

While RECs play a vital role in promoting renewable energy and can be an essential part of a broader sustainability strategy, they should only be used after all efforts to avoid and reduce emissions have been exhausted. The hierarchy prioritises direct actions to prevent and reduce impacts before turning to measures like RECs to offset residual emissions.

The time and location aspects of renewable electricity claims are crucial. For example, claiming 100% renewable electricity through RECs may greenwash the reality, making it seem like the sun shines all day and night. In other words, purchasing RECs can be like buying solar credits to offset nighttime coal consumption. RECs are also often purchased far from where the energy is consumed, leading to claims of renewable electricity usage in places where it isn't physically feasible.

In real electricity markets, such mismatches are not allowed. For instance, a user cannot contract renewable energy in Norway for use in Portugal. However, RECs enable this loophole. RECs do not create a demand for local, clean electricity, undermining the push for local renewable energy development.

Despite scientific consensus that RECs should be used as a last resort, fashion brands increasingly disclose that they are buying them to meet their renewable energy targets and offset their emissions. This reliance often serves to strategically enhance sustainability claims rather than directing real resources toward renewable energy investments. Put differently, RECs serve as a convenient mechanism to offset emissions without driving significant changes. This is underscored by the fact that the Science Based Targets Initiative – the world's most influential validator of corporate targets, provide little incentive for higher-quality renewable electricity strategies as they validate subpar practices that may undermine genuine efforts to boost renewable energy use.

To illustrate this point, some brands transparently disclose the percentage of their electricity usage that is matched to RECs. For instance, a brand with a 100% renewable electricity target might claim that 20% of their electricity usage comes from RECs, suggesting 20% progress toward their target. However, this does not mean that 20% of their electricity consumption is derived from renewable sources; the actual electricity may still come from non-renewable sources like coal and gas. The bottom line: RECs allow fashion brands to play the system because they allow brands to keep using fossil fuels and offset that consumption rather than reflective of a physical shift to renewable energy use – like claiming to improve traffic by purchasing a bus pass but continuing to drive your car.

> RECs allow brands to keep using fossil fuels and offset that consumption rather than physically shift to renewable energy use

So, where brands are claiming to have achieved 100% renewable electricity in their scopes 1 and 2, it is important to have transparency on how they are accounting for this to understand the robustness of their claim. The primary issue remains the lack of action on scope 3 emissions – which account for 96% of emissions on average – and is far more challenging to address.

"The temptation to skip to steps lower in the hierarchy that are easier or cheaper will at best provide a temporary bandaid to these complex global challenges and at worst, cannibalise efforts for meaningful change"

Martha Stevenson
Senior Director Forest Strategy & Research
Chris Weber
Global Climate & Energy Lead Scientist at WWF

No major fashion brand discloses hourly supply chain electricity use, making their renewable energy claims unreliable and incomplete for true decarbonisation.

For the first time, we are measuring if brands disclose the share of supply chain electricity consumption matched on an hourly basis – also known as a 24/7 hourly matching. This practice ensures that electricity consumption is matched by renewable energy production every hour, unlike traditional annual or monthly matching.

> The fashion industry shows a mixed commitment to renewable energy, with significant gaps in supply chain transparency and rigorous accounting methods

Think of it like budgeting money: traditional methods are staying within your budget for the month, even if spending varies widely day to day. With 24/7 hourly matching, it's never spending more than you earn each hour, ensuring continuous financial stability. Similarly, annual or monthly matching can claim renewable energy use without meeting hourly demand, leading to gaps filled by fossil fuels.

This approach is vital for achieving a fully decarbonised power system by 2040, as it supports robust emissions tracking and signals demand for renewable electricity. With corporate electricity consumption accounting for half of global use, hourly matching helps stabilise the grid and reduces reliance on fossil fuel power plants, aiding in climate target achievements.

Until the much-needed shift from annual carbon accounting to 24/7 hourly matching occurs, carbon accounting lacks credibility. Simply put, 24/7 hourly matching ensures emissions are measured accurately and reported correctly.

Currently, Denmark is the only country with over 50% of its energy from solar and wind. Achieving 100% 24/7 hourly matching through granular certificates is costly, but not impossible. When fashion brands claim that 24/7 hourly matching is unfeasible, they are essentially admitting that full decarbonisation of the fashion industry is not possible.

To conclude, the fashion industry shows a mixed commitment to renewable energy, with significant gaps in supply chain transparency and rigorous accounting methods. Transitioning from annual matching and RECs to 24/7 hourly matching and more transparent and meaningful procurement strategies is essential for deep decarbonisation and achieving long-term sustainability goals.

As outlined already, many fashion production countries are reliant on fossil fuels and crucially, the procurement options in these areas are limited and each country has its own challenges. For example, PPAs are not yet available in Bangladesh. Brands have an important role to play in advocating for the policy changes required to grow access to renewable energy in production countries. More on this in Section 5: Just Transition and Advocacy.

"24/7 hourly matching is the ultimate end goal. By ensuring that a company is supplied by clean power every hour, everywhere – fossil reliance is truly eliminated. This creates critical incentives for renewables and the flexibility technologies needed to integrate them into the power system."

Killian Daly
Executive Director at EnergyTag

VIEWPOINT

HIDDEN DATA IS DELAYING PROGRESS ON CLIMATE ACTION

RUTH MACGILP

Fashion Campaign Manager
Action Speaks Louder

Climate scientists are increasingly alarmed by just how quickly climate models are being outpaced by record-breaking temperatures and extreme weather events. Even the most optimistic predictions risk being surpassed as we smash through six out of nine planetary boundaries and already exceed 1.5°C of global heating.

How could this be? In part, it is because we really don't know the true scale of our global carbon footprint, due to a system of mostly voluntary, unregulated emissions accounting.

Several calculations have attempted to estimate the fashion industry's emissions, largely based on incomplete fibre production data, ranging from 1.8% to 4.6% to 8–10% of the whole economy. But as this report shows, almost half of brands do not even disclose their Scope 3 emissions. There are also huge gaps in our understanding of fashion's climate impact because of the top-down nature of the sector, where supply chain emissions data is largely based on secondary averages pulled from flawed lifecycle analysis (LCA) studies. Meanwhile, brands only report emissions from products that reach the shop floor, leaving cancelled orders as ghosts in the machine.

Out of the 117 brands that disclosed SBTi targets, 42 have reported an increase in their scope 3 emissions compared to their baseline year. What's more, 24% of brands disclosed absolutely nothing about their decarbonisation plans, and most brands failed to commit to phasing out coal, electrifying thermal processes or transitioning to renewable energy.

As the Intergovernmental Panel on Climate Change (IPCC) recommends, emissions of all sectors must halve by 2030 to mitigate the most catastrophic climate impacts—which are already being experienced by communities and workers in brands's own supply chains—so we must call out these major brands for their climate inaction, just like the fossil fuel companies they rely on.

> We really don't know the true scale of our global carbon footprint, due to a system of mostly voluntary, unregulated emissions accounting

So much of the problem, and therefore the solution, lies with the rules of the game – aka the non-binding nature of emissions disclosure and decarbonisation plans. Accounting loopholes, misleading reporting, corrupt funding and false solutions – like carbon offsets and renewable energy credits – dominate the corporate sustainability landscape. Certification schemes and multi-stakeholder initiatives provide smokescreens for inaction. PR-friendly promises are substitutes for implementation and investment. While I'm under no illusion that a corporate entity will have pure intentions for the challenging and expensive work of climate mitigation, integrity and transparency are essential to align with the harsh reality climate science is screaming at us.

It is positive to see tangible signs of progress in this year's report, like a growing number of brands setting emissions reduction targets across all scopes. Time-bound, measurable targets are essential to driving investment, enabling accountability, and signalling change across the industry. Still, it's difficult to celebrate these incremental improvements when emissions continue growing beyond an already sky-high baseline.

Looking forward, we need to see brands prioritise three actions. First, setting short and long-term targets aligned with a 1.5°C pathway. Second, developing credible, strategic roadmaps to meet these targets, including renewable energy procurement plans. Third, integrating the climate strategy into the business strategy by backing up these targets with financial investment— brands must provide substantial support and fairer purchasing practices for suppliers to access decarbonisation, and ultimately address the short term profit-driven fast fashion business model that drives overproduction and waste. Where should companies start? By publicly disclosing each of these steps.

For every sustainability claim we see, we need to ask one fundamental question. Does this actually make an impact on reducing emissions, ditching fossil fuels or scaling up renewable energy? If not, the Earth simply cannot tell the difference.

FINANCING DECARBON-ISATION

APPROACH

WHAT THIS SECTION COVERS

In this section, we measure transparency of efforts to finance fashion's decarbonisation from fossil fuels to renewable energy. Firstly, we look for a brand's efforts to identify and respond to climate-related risks – like floods, droughts and heatwaves – which have financial impacts on their business. When fashion brands identify substantive costs of climate risks on their business operations, they are more likely to act on them. This is why we look for disclosure of climate risks through a financial lens.

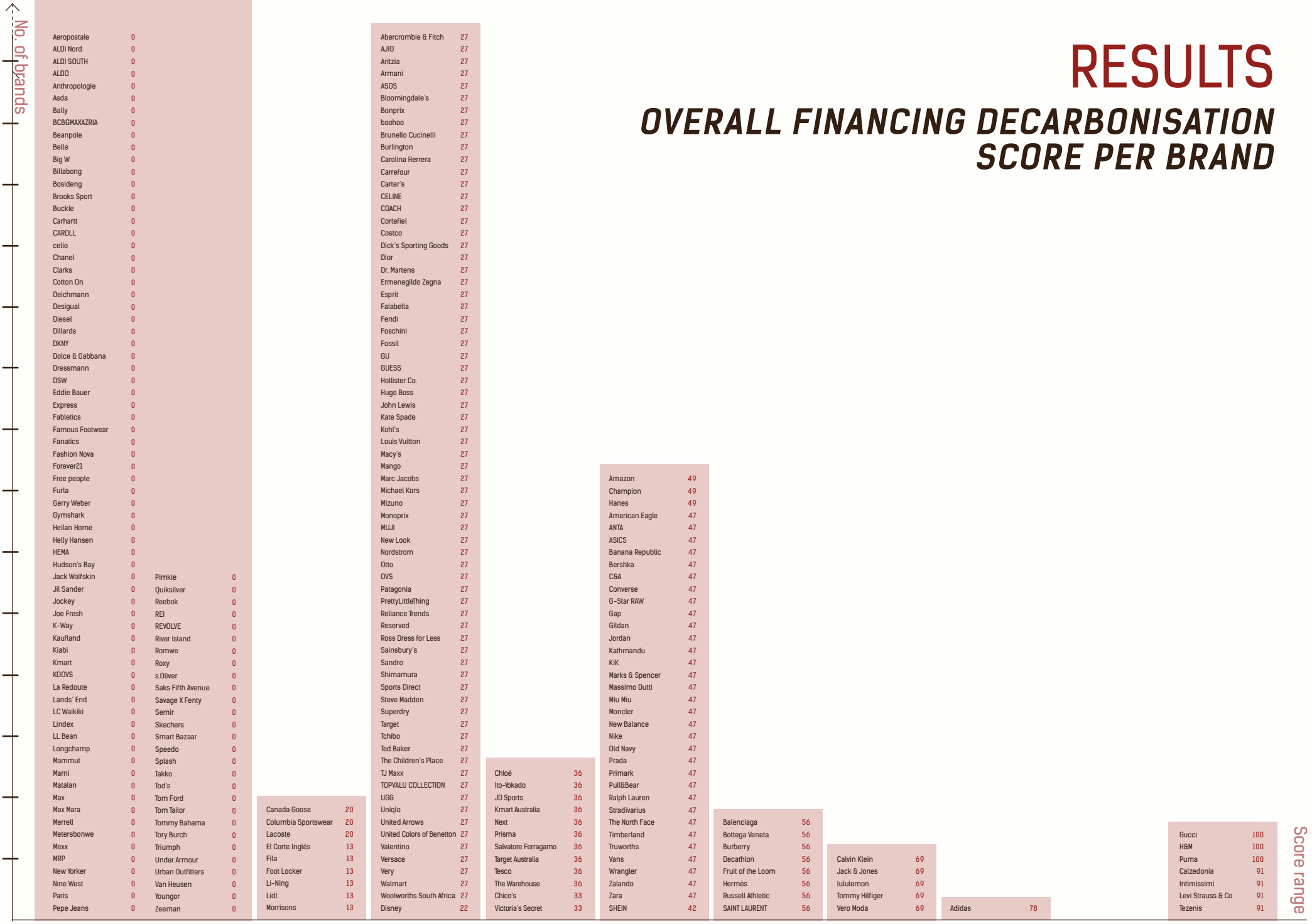
We measure disclosure on the level of annual investment in renewable energy in the brand's supply chain, and look for details on the scale of support offered. The annual investment figures that brands disclose could encompass costs like helping suppliers access finance to cover costs of a just transition, sustainability-linked loans, insetting back into supply chain such as investment in renewable energy projects. This finance could cover costs such as replacing coal-powered boilers with electric boilers and installing solar-panels on factory roofs. Without substantial financial investment, the transition from fossil fuels to renewable energy in fashion's supply chains will not be possible.

This section also captures internal carbon pricing. In essence, an internal carbon price helps fashion brands make more environmentally and financially sound decisions by taking into account the cost of carbon emissions in both internal accounting and strategic planning. We are looking for whether brands disclose an internal price on carbon and what that price is. For example, if a fashion brand discloses that they set an internal carbon price of $50 per tonne of CO2e, this would be used in decision-making. When making sourcing decisions, if a brand includes the cost of expected emissions in its calculations, a more energy-efficient factory that emits less CO2e becomes more financially attractive because it would incur lower internal carbon costs.

Finally, we look for how brands invest in energy efficient solutions in facilities across their supply chain. For example, investment in better building insulation or efficiency manufacturing processes to reduce energy consumption. This could also include metering, optimising and fixing broken equipment. We also credit disclosure on brand participation in programmes to improve energy efficiency across the supply chain, such as Apparel Impact Institute's (Aii) Clean by Design Programme and the Partnership for Cleaner Textiles (PaCT).

RESULTS

OVERALL FINANCING DECARBONISATION SCORE PER BRAND

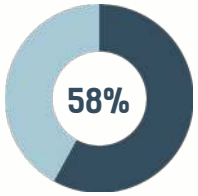


0 – 10%				11 – 20%		21 – 30%		31 – 40%		41 – 50%		51 – 60%		61 – 70%		71 – 80%		81 – 90%		91 – 100%	
Aeropostale	0	Pimkie	0	Canada Goose	20	Abercrombie & Fitch	27	Chloé	36	Amazon	49	Balenciaga	56	Calvin Klein	69	Adidas	78			Gucci	100
ALDI Nord	0	Quiksilver	0	Columbia Sportswear	20	AJIO	27	Ito-Yokado	36	Champion	49	Bottega Veneta	56	Jack & Jones	69					H&M	100
ALDI SOUTH	0	Reebok	0	Lacoste	20	Aritzia	27	JD Sports	36	Hanes	49	Burberry	56	lululemon	69					Puma	100
ALDO	0	REI	0	El Corte Inglés	13	Armani	27	Kmart Australia	36	American Eagle	47	Decathlon	56	Tommy Hilfiger	69					Calzedonia	91
Anthropologie	0	REVOLVE	0	Fila	13	ASOS	27	Next	36	ANTA	47	Fruit of the Loom	56	Vero Moda	69					Intimissimi	91
Asda	0	River Island	0	Foot Locker	13	Bloomingdale's	27	Prisma	36	ASICS	47	Hermès	56							Levi Strauss & Co	91
Bally	0	Romwe	0	Li-Ning	13	Bonprix	27	Salvatore Ferragamo	36	Banana Republic	47	Russell Athletic	56							Tezenis	91
BCBGMAXAZRIA	0	Roxy	0	Lidl	13	boohoo	27	Target Australia	36	Bershka	47	SAINT LAURENT	56								
Beanpole	0	s.Oliver	0	Morrisons	13	Brunello Cucinelli	27	Tesco	36	C&A	47										
Belle	0	Saks Fifth Avenue	0			Burlington	27	The Warehouse	36	Converse	47										
Big W	0	Savage X Fenty	0			Carolina Herrera	27	Chico's	33	G-Star RAW	47										
Billabong	0	Semir	0			Carrefour	27	Victoria's Secret	33	Gap	47										
Bosideng	0	Skechers	0			Carter's	27			Gildan	47										
Brooks Sport	0	Smart Bazaar	0			CELINE	27			Jordan	47										
Buckle	0	Speedo	0			COACH	27			Kathmandu	47										
Carhartt	0	Splash	0			Cortefiel	27			KiK	47										
CAROLL	0	Takko	0			Costco	27			Marks & Spencer	47										
celio	0	Tod's	0			Dick's Sporting Goods	27			Massimo Dutti	47										
Chanel	0	Tom Ford	0			Dior	27			Miu Miu	47										
Clarks	0	Tom Tailor	0			Dr. Martens	27			Moncler	47										
Cotton On	0	Tommy Bahama	0			Ermenegildo Zegna	27			New Balance	47										
Deichmann	0	Tory Burch	0			Esprit	27			Nike	47										
Desigual	0	Triumph	0			Falabella	27			Old Navy	47										
Diesel	0	Under Armour	0			Fendi	27			Prada	47										
Dillards	0	Urban Outfitters	0			Foschini	27			Primark	47										
DKNY	0	Van Heusen	0			Fossil	27			Pull&Bear	47										
Dolce & Gabbana	0	Youngor	0			GU	27			Ralph Lauren	47										
Dressmann	0	Zeeman	0			GUESS	27			Stradivarius	47										
DSW	0					Hollister Co.	27			The North Face	47										
Eddie Bauer	0					Hugo Boss	27			Timberland	47										
Express	0					John Lewis	27			Truworths	47										
Fabletics	0					Kate Spade	27			Vans	47										
Famous Footwear	0					Kohl's	27			Wrangler	47										
Fanatics	0					Louis Vuitton	27			Zalando	47										
Fashion Nova	0					Macy's	27			Zara	47										
Forever21	0					Mango	27			SHEIN	42										
Free people	0					Marc Jacobs	27														
Furla	0					Michael Kors	27														
Gerry Weber	0					Mizuno	27														
Gymshark	0					Monoprix	27														
Heilan Home	0					MUJI	27														
Helly Hansen	0					New Look	27														
HEMA	0					Nordstrom	27														
Hudson's Bay	0					Otto	27														
Jack Wolfskin	0					OVS	27														
Jil Sander	0					Patagonia	27														
Jockey	0					PrettyLittleThing	27														
Joe Fresh	0					Reliance Trends	27														
K-Way	0					Reserved	27														
Kaufland	0					Ross Dress for Less	27														
Kiabi	0					Sainsbury's	27														
Kmart	0					Sandro	27														
KOOVS	0					Shimamura	27														
La Redoute	0					Sports Direct	27														
Lands' End	0					Steve Madden	27														
LC Waikiki	0					Superdry	27														
Lindex	0					Target	27														
LL Bean	0					Tchibo	27														
Longchamp	0					Ted Baker	27														
Mammut	0					The Children's Place	27														
Marni	0					TJ Maxx	27														
Matalan	0					TOPVALU COLLECTION	27														
Max	0					UGG	27														
Max Mara	0					Uniqlo	27														
Merrell	0					United Arrows	27														
Metersbonwe	0					United Colors of Benetton	27														
Mexx	0					Valentino	27														
MRP	0					Versace	27														
New Yorker	0					Very	27														
Nine West	0					Walmart	27														
Paris	0					Woolworths South Africa	27														
Pepe Jeans	0					Disney	22														

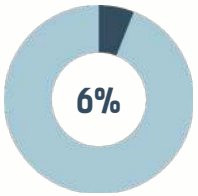
* Brands ranked in alphabetical order by score out of 22.5 possible points in this section, but shown as rounded-up percentage.

FINDINGS

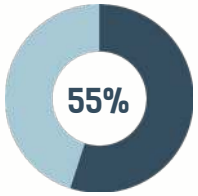
FINANCING DECARBONISATION



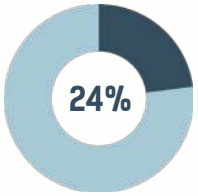
Discloses process(es) for identifying, assessing and responding to climate-related risks including details of risks identified with the potential to have a substantive financial or strategic impact on your business



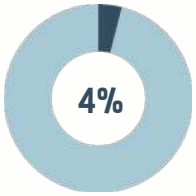
Discloses the level annual investment in renewable energy (i.e. investment in R&D, purchase of facilities, helping suppliers access finance to cover costs of a green transition, sustainability-linked loan, insetting back into supply chain such as investment in renewables)



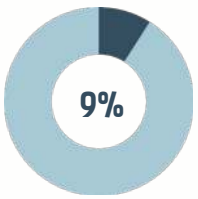
Provides details of risks identified with the potential to have a substantive financial or strategic impact on your busines



Discloses how brand invests in energy efficient solutions at supplier level: eg. investment in better building insulation or efficiency manufacturing processes to reduce energy consumption



The brand discloses details on the scale of support offered



The brand discloses an internal price on carbon and what that price is

ANALYSIS

FINANCING DECARBONISATION

Polluter pays: Brands must put their money where their emissions are

Leaving aside the moral imperative for companies to act, our findings reveal that the majority of big fashion brands understand in detail how significantly the climate crisis is likely to impact their bottom line. 58% of brands disclose how they identify and respond to climate-related risks which have a substantive financial or strategic impact on their business. Slightly fewer, 55%, provide specific details of these climate-related risks – such as floods, droughts and heatwaves. Understanding these climate and financial risks is crucial for brands to take proactive steps towards reducing greenhouse gas emissions (mitigation) and developing resilient supply chains capable of navigating climate hazards (adaptation).

> Major fashion brands that contribute the most towards fashion's climate emissions should bear the greatest financial responsibility for this transition to renewable energy

In terms of the costs of transition, a positive is that energy efficiency investments offer energy, emissions and cost savings that eventually pay for themselves through reduced energy bills. For instance, electrification projects with heat pumps in textile supply chains in Japan, China and Taiwan offer energy cost savings. However, the initial transition from fossil fuels to renewable energy in fashion manufacturing is a greater budgetary consideration as it requires substantial upfront financial investment. It is also far more costly than false or partial solutions such as carbon offsetting. From replacing coal-fired boilers in fabric mills to electric ones, to installing solar panels on factory roofs, one thing is clear – decarbonising fashion's supply chains costs money. At the upper end, equipping one facility (factory) with solar or wind renewable energy costs between USD 1M – 5M. At mid-level, energy efficiency improvements such as boiler replacement, smart metering etc can cost between USD 500K and 1M per facility. The key question is – who pays?

To reach Net Zero by 2050, an estimated USD $1 trillion of financial support for suppliers is needed to transition to renewable energy over the next 30 years in fashion's supply chains – that's about USD$33 billion per year. This funding could go far to significantly reduce the industry's greenhouse gas emissions and help phase out fossil fuels in fashion's manufacturing.

> We are calling for major fashion brands to invest at least 2% of their annual revenues on a fair transition away from fossil fuels

Major fashion brands that contribute the most towards fashion's climate emissions should bear the greatest financial responsibility for this transition to renewable energy. This is in alignment with the Polluter Pays Principle, which states that the costs of pollution should be borne by those causing it, rather than those who suffer the effects of the resulting environmental damage.

To that end, Fashion Revolution is urging big fashion to put their money where their emissions are. We are calling for major fashion brands to invest at least 2% of their annual revenues on a fair transition away from fossil fuels – like coal – to renewable energy sources – like wind and solar – to power fashion's supply chain in a clean way.

We also look to other stakeholders that profit from fashion's climate emissions to contribute towards the transition to renewable energy. Simply put, those that profit from fashion's emissions also have a responsibility to pay towards this transition. Collaboration with and co-financing from other stakeholders, known as blended finance, is central to the transition to renewable energy. These stakeholders include local and national governments, which can provide incentives, subsidies, and supportive policies, as well as international organisations like the World Bank and the United Nations, which can offer funding and technical assistance, as well as investors, financial institutions and philanthropy funds. Suppliers themselves also have a role to play in financially contributing to upgrades, commensurate with their ability to pay. However, major fashion brands – who profit the most – have an outsized responsibility to finance this transition.

Suppliers need brand funding, not debts

The fact that 94% of major fashion brands disclose no information about their investments in renewable energy within their supply chains is an appalling and dangerous indictment of corporate impunity in the fashion industry. Given the scale and urgency of the climate crisis, and fashion's role as a key driver of the climate crisis, this lack of transparency is particularly egregious. Fashion brands, which profit immensely from driving one of the most polluting industries on the planet, have a profound responsibility to finance the transition away from fossil fuels to renewable energy and to be transparent about their actions. By failing to disclose their investments (if any), and by evading accountability, these fashion brands perpetuate environmental degradation and climate injustice.

Just 6% of major fashion brands disclose how much they invest in renewable energy in their supply chain. Even fewer, just 4%, disclose the scale of support provided. Those 6% of brands disclose efforts including their contributions to joint climate funds like Apparel Impact Institute's (Aii) Fashion Climate Fund and Fashion Pact's Future Supplier Initiative. Typically, these funds provide suppliers with loans at favourable rates to invest in costly infrastructure like solar panels. But suppliers, who already operate on thin margins, need brand funding, not debts. Burdening suppliers with debt to meet brands' climate targets is not a fair solution.

Debt-based financing perpetuates and exacerbates the longstanding power imbalances between fashion brands and the suppliers and workers who make their clothes. These imbalances have been the bedrock of persistent labour rights issues in fashion supply chains, such as poverty wages. There may also be some cultural and religious reluctance to accrue debts among some suppliers who have proudly built their businesses up with cash, not debt. This reluctance is understandable given the prevalence of exploitative purchasing practices among fashion brands, who routinely race to the bottom to chase the lowest prices. How can suppliers afford to repay loans if brands stop buying or push prices so low that suppliers cannot make a reasonable profit?

> 94% of major fashion brands disclose no information about their investments in renewable energy

In addressing the urgent need for decarbonisation in the fashion industry at pace and scale, we advocate an expansion of grant-based funding within fashion climate funds. For example, the Aii Fashion Climate Fund currently provides grants and subsidies for initial sustainability initiatives, including technical assistance and carbon roadmapping. These grants need to be expanded to also cover the costs of implementing renewable energy infrastructure, such as solar panels, and energy-efficient upgrades, including improved insulation.

To enable this, Fashion Revolution calls directly on the 94% of major fashion brands that currently disclose no information about their investments in renewable energy within their supply chains to contribute towards this critical transition. Collective action and collaboration from all major fashion brands, especially those currently silent, is essential to addressing the scale and urgency of the climate crisis.

Aligning with the principles of equity and proportionality, as advocated by suppliers calling for a Fair Climate Fund, this expanded funding would ensure that all suppliers can access the necessary resources to transition to more sustainable operations. By subsidising renewable energy projects and energy-efficient upgrades based on supplier need, we can create a more just pathway toward a sustainable future for the fashion industry that avoids burdening suppliers with debt to meet brands' climate targets. This is especially true given the lack of transparency on how suppliers were consulted in the formation of climate targets that affect them, as outlined in Section 5: Just Transition & Advocacy.

Systems change, not pilot projects: Brand investment in decarbonisation must urgently be scaled up beyond a few token suppliers.

The fashion industry's short-term, profit-focused outlook is also preventing much-needed decarbonisation work from getting funded. Research from Fashion for Good and Apparel Impact Institute (Aii) shows that most garment manufacturers have limited visibility into order volumes beyond 12 months. The short-term nature of purchase agreements discourages banks – often seeking assurances that volumes will be maintained during the life of the loan – from financing decarbonisation projects at supplier level. Alongside essential brand financing, for suppliers to transition to renewable energy, they need long-term commitments from their brand customers that provide confidence that they will be able to recover their significant investments in new infrastructure.

> 24% of brands disclose their investments in energy-efficient solutions at the supplier level

Pilot projects to improve energy efficiency in garment supply chains have been documented for years. This year, 24% of brands disclose their investments in energy-efficient solutions at the supplier level such as better building insulation, installing metering, optimising and fixing broken equipment and more efficient manufacturing processes to reduce energy consumption. Over time, these investments will pay for themselves through reduced energy bills, as well as reducing emissions. While all efforts to reduce energy use at the facility level are necessary and welcome, current initiatives often operate in isolation, driven top-down by fashion brands without sufficient consultation with suppliers. These incremental advancements fail to match the scale and urgency required for a renewable energy transition in fashion. Moreover, brands often spotlight these efforts on their websites and in sustainability reports as though they are widespread across the entire supply base rather than being implemented in a few choice suppliers. This is misleading and does not accurately represent what is happening systemically across a brand's full supply chain.

Among the 24% of brands that are transparent about investments in energy-efficient solutions at the supplier level, many receive credit for brand participation in programmes to improve energy efficiency across the supply chain, such as Aii's Clean by Design Programme and the Partnership for Cleaner Textiles (PaCT). While we welcome these efforts, there is a need for greater transparency regarding the implementation and outcomes of these initiatives, as well as how extensively suppliers are consulted about participating in them. Meaningful consultation with suppliers is crucial to determine whether these initiatives are the most effective way to reduce energy use at their facilities. Suppliers possess valuable expertise about their specific contexts, and brands should leverage this knowledge to identify the best solutions.

Putting a financial cost on carbon emissions

Setting an internal carbon price helps fashion brands make better environmentally and financially sound decisions by taking into account the cost of carbon emissions in both internal accounting and strategic planning. Carbon prices can be used to justify or avoid business decisions, such as whether or not to make an investment. For example, if a fashion brand discloses that they set an internal carbon price of EUR 86 per tonne of CO2, and their factories rely on fossil fuels to function, putting a price on the carbon emissions emitted by those factories will incentivise brands to move to renewable energy to reduce their carbon footprint and, thus, the cost associated with their carbon emissions.

> 9% of fashion brands publicly disclose using an internal carbon price

9% of fashion brands publicly disclose using an internal carbon price, and the price itself ranges from one brand to another. There is a need to standardise and align the carbon price across the industry. Typically, brands disclose their carbon price in the Task Force on Climate-related Financial Disclosures (TCFD) section of their CDP Reports. Interestingly, in that section, brands identify carbon as a financial risk – i.e. carbon pricing imposes a direct financial cost on brands for their GHG emissions. Therefore, operations with high carbon footprints represent a significant financial risk to the company. Brands using an internal carbon price integrate GHG emission reductions into their decision-making, promoting accountability for carbon emissions across the company.

"In order to achieve the UNFCCC'S Fashion Charter goal of 50% reduction by 2030 and net zero by 2050, we do need to move beyond foundational best practices. We must start to focus on implementing process-level decarbonisation activities and a rapid transition to renewable energy sources. These types of projects have longer payback periods and are more risky to implement for suppliers, therefore more collaboration between brands and suppliers is needed.

[According to the data,] six percent of brands disclose their investment in renewable energy in their supply chain or production country. It is great to see leading brands taking these actions as it presents a departure from business-as-usual relationships with suppliers. Given renewable energy – in particular, the transition to lower carbon thermal energy – will be a large contributor to achieving sectoral targets, more financial commitments from" brands are needed. We should expect this from all 47% of the brands that have set and are disclosing science-based targets."

Pauline Op de Beeck
Environmental Portfolio Lead,
Apparel Impact Institute (Aii)

HOW HAS THE CLIMATE CRISIS IMPACTED YOU?

Achol

Jahia

Hana (centre) **Credit:** UNHCR/ N. Abdulhak

Abogo
Credit: © UNHCR

My name is Achol and I am an internally displaced person. I was born in Bor Jonglei–State South Sudan. I have been displaced twice. First, in 2013, due to the civil war outbreak in my State. Then, I returned home, but was displaced for a second time by floods.

This year was so hot that our children's school closed for almost one month. The heat brought eye disease to us.

In 2022, there were so many floods that destroyed our food crops – sorghum, maize and beans. My family lost all the livestocks, all our cows died, my house was half submerged in water and fell down. As a result of the water level being high, my daughter has now developed knee problems.

To escape the flooding, we then moved to a small piece of land that was high in elevation. But there we could not grow crops and our cows produced very little milk. It became hard to feed our children.

All of us were staying in a small piece of land that is high. We could not cultivate, cow's milk was very scarce, feeding our children became hard. Moving to another location was very hard because there were no boats. The lack of basic resources, like food, led to further conflict in the community, and many young people lost their lives.

I found my way to Juba where I am now doing beading at Roots and other relatives of mine are in a camp in Uganda and others in Kakuma camp in Kenya.

Life is hard.

Achol

We live in Gorom refugee camp because of insecurity in our home, Ethiopia. We love beading and it's part of us. We are happy that we get to work as beading artisans for Roots while living in this camp.

Back home in Ethiopia, we had farms and we could grow crops. But then the rain stopped. There was not enough rain for a long time and we could only harvest crops once a year.

For 3 to 4 years in a row now we are experiencing a drought. When the rain comes it can be so heavy that it destroys all our crops.

Hana and Abogo

I am from Gambella, Ethiopia, and I became a refugee 15 years ago in South Sudan due to political instability in my motherland. I have been doing beading since I was a child. Now I find myself in the Gorom camp working for Roots, and my beading skills are providing an income.

When my family was back in Gambella, we used to plant crops throughout the year. But here in Gorom refugee camp, the soil is not fertile all year round due to the climate. We had to wait for months before planting a seed. Now you can see, there is fresh maize, because the rain has finally come.

Now there is too much hunger and too much heat. I don't know how I can finish the year.

Jahia

The effects of the climate crisis are very visible across communities in Zimbabwe and yet the cause remains an inheritance of communities elsewhere. This injustice can be experienced across craft and fashion with fewer natural resources available to artisans and more clothing waste being brought into the country. And though communities across craft, art and fashion find creative ways to repurpose, reuse and recycle, our slow processes can hardly keep pace with the fast consumerism.

Haleema Mekani
Fashion Revolution Zimbabwe

Haleema

Shruti

Local communities in India face significant challenges related to healthcare, education, transportation, livelihoods, and food security. The climate crisis presents an additional hurdle to their socio-economic development. These communities have long been adapting to the impacts of the changing climate through adjustments in mobility, land use, livelihood strategies, and institutional arrangements. Even efforts to achieve the Net Zero goal have unintentionally aggravated several problems. For example, the development of hydropower plants has adversely affected biodiversity, caused job losses and displaced residents.

Akanksha Mary
Fashion Revolution India

Akanksha

The climate crisis poses a significant threat to the rich heritage of crafts and the livelihoods of craftspeople in India and globally. Unpredictable weather patterns, extreme temperatures, erratic rainfall, and heatwaves disrupt production cycles and affect the availability of natural resources crucial for traditional crafts, such as cotton, silk, and natural dyes. Craftspeople, who are on the frontline of the climate crisis, face increased vulnerability as their livelihoods depend heavily on these natural resources. Without timely intervention, many traditional practices are at risk of becoming extinct. Protecting artisans and their vital cultural legacies demands urgent climate action.

Shruti Singh
Fashion Revolution India

Hadeel

The impacts of extreme heat, desertation, haboob (intense dust storms) and flooding have become increasingly dire across the 18 states of Sudan. The climate crisis has been noticeable to the average individual and mostly to those working in the farming, agriculture and energy sectors.

Alongside these intense environmental changes to the already climate vulnerable Sudan, the proxy war which has been ongoing for a year and three months, caused millions of civilians to either become internally displaced or having resorted to fleeing to neighbouring countries for shelter and safety. As such, the nation is essentially not functioning as prior to the war and both the climate and the conflict have caused all production, manufacturing and agricultural activities to face disruption. Major losses and infrastructural damages in the entire supply chain are seen, where homes, farms, roads, markets, irrigation systems and storage facilities have all either been completely destroyed or damaged and looted.

It makes me feel very hopeless. I live in constant fear knowing that the lives of my extended family and community are at risk, with no lifeline in sight. Not only have they had to flee to different parts of the country, they are struggling with the extremely high temperatures at a time where access to electricity is either non-existent or sporadic. They are also unable to access clean water or any water at all, are at fear of the impending flooding that is expected to come with the rainy season and worst of all, the famine that is predicted to affect the lives of millions by this September.

Hadeel Osman
Fashion Revolution Sudan

JUST TRANSITION & ADVOCACY

APPROACH

WHAT THIS SECTION COVERS

This section looks at how transparent major fashion brands and retailers are about their efforts to support a clean, fair, and just energy transition from different angles. Firstly, we looked at what business strategies they have publicly outlined that explicitly commit to a Just Transition. Our assessment was shaped by what Climate Action 100+, the World Benchmarking Alliance and the We Mean Business Coalition advocate for when it comes to just transition policy. We also utilised the International Labour Organization's Just Transition Guidelines.

Secondly, we explored whether big fashion brands are transparent about how they consult and co-create with their suppliers on the setting of their climate targets. We also looked at how they are supporting suppliers to adapt to climate change, sensitive to their local contexts.

Thirdly, we looked at how transparent big brands are when it comes to engaging with workers and local communities impacted by their climate strategies. This looks like public disclosure on how they are co-creating solutions, how they retain and or up-skill workers whose jobs may be at risk and also public disclosure on how they compensate workers who may be impacted by climate hazards.

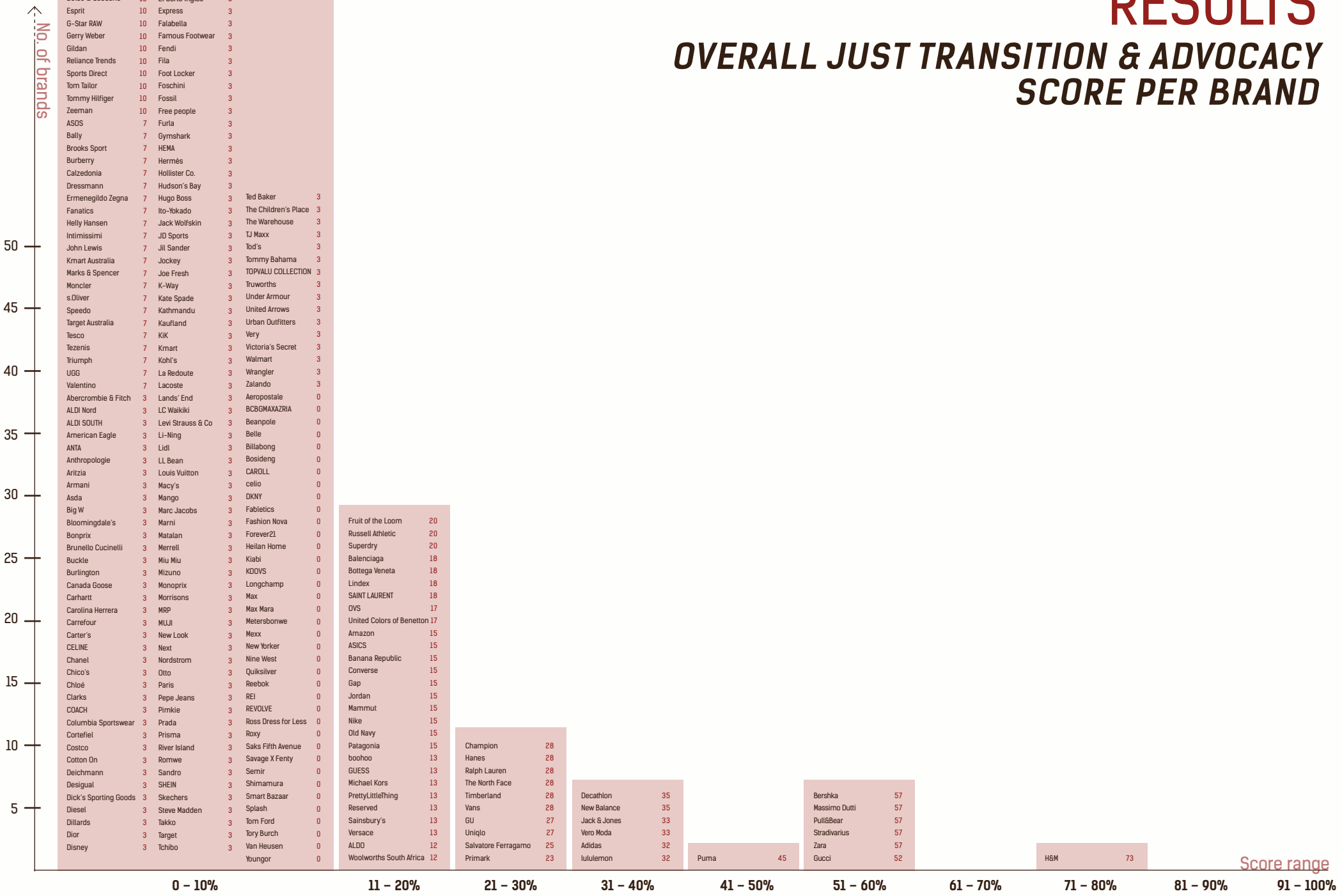
We also evaluated the extent to which brands publish their commitments to enabling rights like freedom of association and collective bargaining.

Additionally, we sought to understand how major fashion brands might be fuelling change in their supply chains where access to renewable energy through public disclosure of their political advocacy for renewable energy and the outcomes of this advocacy. Finally, we looked at whether or not brands disclose a public commitment to ensure that their suppliers transitioning to renewable energy do not procure solar panels made with high-risk of State-Imposed Forced Labour.

Image: Fair Wear Foundation

RESULTS

OVERALL JUST TRANSITION & ADVOCACY SCORE PER BRAND

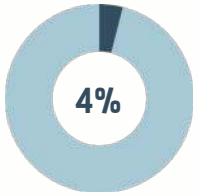


* Brands ranked in alphabetical order by score out of 30 possible points in this section, but shown as rounded-up percentage.

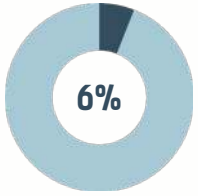
JUST TRANSITION

FINDINGS

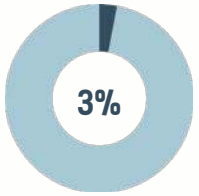
JUST TRANSITION



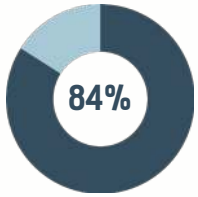
Publicly commits to a Just Transition strategy to identify, cease, prevent & mitigate adverse social impacts to workers, local communities and other stakeholders



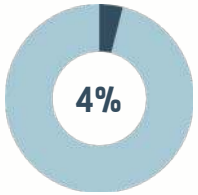
Disclose how the brand is engaging with workers, local communities, and other affected stakeholders to identify the impacts of the climate strategy and co-create local solutions and mitigations



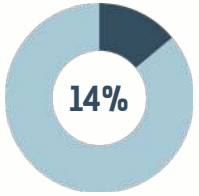
Discloses how suppliers were consulted to co-create climate targets that impact the brand's supply chain



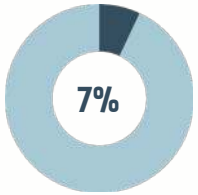
Discloses the brand's commitment or policy on Freedom of Association, Right to Organise & Collective Bargaining in the supply chain



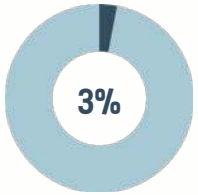
Discloses brand efforts to retain and re- and/or up-skill supply chain workers whose jobs are at risk



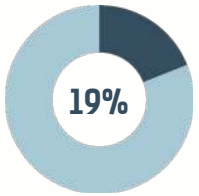
Discloses the number or % of supplier facilities covered by collective bargaining agreements



Discloses how the brand is engaging with suppliers across the supply chain to co-create local solutions to climate adaptation, sensitive to local contexts

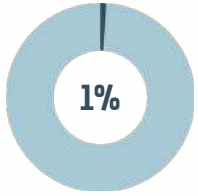


Discloses efforts to financially compensate workers affected by the impacts of the climate crisis (loss and damage) and/or a brand's decarbonisation strategy



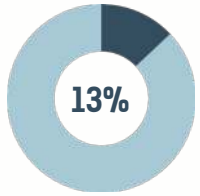
Discloses the number or % of supplier facilities that have independent, democratically elected trade unions

RIGHTS-RESPECTING TECHNOLOGIES

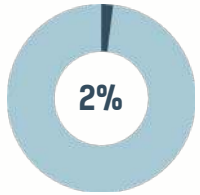


Discloses a public commitment to ensure that suppliers transitioning to renewable energy do not procure solar panels made with high-risk of State-Imposed Forced Labour

RENEWABLE ENERGY ADVOCACY



Discloses evidence of past and current renewable energy advocacy in their supply chains



Discloses outcomes of past and current renewable energy advocacy in their supply chains

ANALYSIS
JUST TRANSITION

The climate crisis is fundamentally an inequality crisis. It is profoundly unjust that communities contributing the least to climate emissions are the most affected by its catastrophic impacts. This is sharply highlighted by Malish in the foreword of the report on page 3, and by artisans and other affected stakeholders on page 86 in response to the prompt: **how has the climate crisis impacted you?** These testimonies convey the devastating challenges faced by communities on the frontlines of the climate crisis.

> **"It is my hope that sharing my story will inspire others, including the major fashion brands in this report, to join us in taking action for a more stable and just world."**
>
> **Malish Godfrey**
> ROOTS of South Sudan

Fashion Revolution stands in solidarity with Malish and all communities experiencing climate hazards, urging the major contributors to emissions to fund a fair transition to renewable energy. This includes major fashion brands and retailers.

Workers are increasingly losing their livelihoods to climate hazards – but they are not being compensated.

The International Labour Organization (ILO) predicts that in 2030, 2.2% of total working hours worldwide will be lost to high temperatures – a productivity loss equivalent to 80 million full-time jobs. Fashion supply chain countries are often those most vulnerable to climate crisis impacts. Key production locations in Bangladesh, India, Pakistan, Ethiopia, Brazil and Türkiye are among those already hit by catastrophic climate hazards such as heatwaves, monsoons and droughts in recent years. These events are, with increasing frequency and intensity, disrupting garment production and damaging businesses to the cost of millions; for example, 45% of Pakistan's cotton crops were washed away by floods in 2022. See the map on page 96. Even more concerning are the impacts that hazards are having on workers, who are among the least responsible for causing climate harms. The most prevalent consequence at worker level is a loss of income due to, for example, flooding of factories or heat stress, making it difficult for them to reach daily production targets. Workers and their families are also among those most vulnerable to illness and fatalities caused by climate hazards.

A striking finding is that a mere 3% of brands – that's just seven out of 250 brands – disclose efforts to financially compensate workers affected by the impacts of the climate crisis, and/or a brand's decarbonisation strategy. For example, we credit brands' disclosure on compensating cotton farmers impacted by the floods in Pakistan. This finding also applies to workers in facilities (like factories) that are exited in favour of an alternative facility in line with the company's climate strategy. This is particularly stark given the weakness of social protection schemes in most garment production countries. Garment workers, most of whom are paid poverty wages, well below a living wage, are already in debt. A study in Cambodia found four out of five workers had gone into debt to cover daily expenses. Without compensation schemes, workers who lose their incomes due to climate hazards are likely to incur even greater debts and face increased financial vulnerabilities, perpetuating the cycle of in-work poverty. Given the regularity of climate hazards impacting the industry and workers' livelihoods, there is a clear responsibility for major fashion brands, the most profiting players in the supply chain, to step up and provide fair compensation mechanisms. This is a matter of justice, not charity. The urgency is underscored by the fact that these brands are driving up the very same GHG emissions that are causing the climate hazards that workers now battle.

> A mere 3% of brands disclose efforts to financially compensate workers affected by the impacts of the climate crisis

The brands that have disclosed their efforts include boohoo, Decathlon, H&M, Jack & Jones, PrettyLittleThing, Primark, and Vero Moda. For specific examples of these disclosures, please refer to the table on the next page.

BRAND DISCLOSURE ON FINANCIAL COMPENSATION FOR WORKERS AFFECTED BY THE CLIMATE CRISIS

Brand	Disclosure
H&M	"To support the people affected by the 2023 earthquake in Türkiye, we made in-kind and cash donations totalling SEK 6.7 million and our customers donated a further SEK 2 million"
Jack & Jones, Vero Moda *(BESTSELLER)*	"A part of this year's New Year's gift in BESTSELLER is a DKK 5 million donation on behalf of the colleagues to seven hand-picked projects in Pakistan, Cambodia and Bangladesh, among others."
boohoo/ PrettyLittleThing	"Making a £100k donation to Kizilay, the Turkish Red Crescent Association to support their work in helping those affected by the earthquakes in Türkiye*"
Primark	"All Primark Sustainable Cotton Programme farmers in Pakistan were affected to varying degrees by the floods in June 2022 which caused damage to crops, livestock, houses and community infrastructure. We worked closely with CottonConnect and REEDS to assess the damage and to understand what support they needed. The Primark Flood Relief Project was established and £140,000 was given to support the setup of 20 mobile medical and veterinary camps. These camps provided support to 2,000 people and 3,000 livestock. 250 families also received goats and hens, while 130 hand pumps and community toilets damaged by the floods were repaired and rebuilt."

* The Türkiye and Syria Earthquake of 2023 was not directly caused by the climate crisis. However, due to its significant impact, it is included in this report. The earthquake on February 6, 2023, tragically killed 55,000 people and severely affected garment worker communities. Transparent data via the Open Supply Hub revealed that the location of the earthquake impacted thousands of mostly apparel, textile, footwear and leather production facilities in the area, highlighting the responsibility of major fashion brands sourcing from the region to support relief and recovery.

Image: Fair Wear Foundation

Big fashion is not taking sufficient action to protect or engage with supply chain workers.

It is estimated that extreme weather events could lead to the loss of nearly 1 million jobs in the fashion sector. However, our data signifies that big fashion brands are not taking sufficient action to protect workers in their supply chain – either from job loss or any other climate hazards.

Just 4% of brands disclose efforts to retain and/or up-skill supply chain workers whose jobs are at risk. We also found that very few brands are disclosing that they are engaging with workers and communities in their supply chains affected by climate breakdown; only 6% of brands disclose how they are engaging with workers, local communities, and other affected stakeholders to identify the impacts of their climate strategy and co-create local solutions and mitigations. This is extremely low and could be seen as a reflection of the top-down, colonial dynamics that have persisted for decades in fashion. Incorporating the insights of workers and other affected stakeholders is essential in leveraging lived experiences to inform a more effective and robust climate strategy. Moreover, gaining buy-in from workers and others affected is likely to improve its implementation.

Confronting the climate crisis involves an overhaul of a system powered by fossil fuels which cannot occur without a knock-on effect on workers and communities. Emerging from the context of trade unions protecting workers in fossil fuel industries, the concept of a 'Just Transition' has grown to include the impact of the climate crisis on vulnerable communities generally. It has come to capture the need for more equity and inclusiveness to be incorporated into climate actions.

Just 4% of brands researched in this year's report disclose a commitment to a Just Transition strategy. Without a public commitment to a Just Transition, we have no guarantee that brands are ensuring that justice and respect for communities are being considered in their transition processes. Major fashion brands often highlight their social and environmental initiatives separately. To make a comprehensive impact on both people and the planet, they need to bridge these divides and approach their actions as an interconnected whole.

The average brand score on the Just Transition and Advocacy section overall across 12 indicators was just 8%. This indicates that big brands are even less transparent about any actions taken to tackle the social impacts of the climate crisis than they are on actions taken on workers' rights generally (the latter will be covered later). With climate hazards expected to intensify in the coming years, workers are confronting increasingly dangerous and uncertain conditions. The fashion industry must learn from the mistakes of the pandemic in which major fashion brands neglected their responsibilities. Mass order cancellations and demands for discounts left suppliers unable to pay wages, triggering a humanitarian crisis for workers.

Persistent inequalities in fashion perpetuate poverty and injustice for those at the bottom of the supply chain. Urgent action is needed to prevent deepening inequalities and to avoid shifting more costs onto workers and suppliers in an unjust transition.

MAJOR CLIMATE HAZARDS IMPACTING THE FASHION INDUSTRY

TÜRKIYE & SYRIA

2023

"A 7.8-magnitude earthquake **killed more than 53,000 people*** in 11 Turkish provinces and displaced over three million. In neighbouring Syria, recent estimates put the number **killed between 5,000 and 8,500 people** while tens of thousands were displaced."

"Unofficial figures for February show a **1.8 per cent drop in exports**."

MOROCCO

2021

"**More than 24 people have died** after heavy rain flooded an illegal underground textile factory in Morocco"

PAKISTAN

2022

"**At least 1,136 people have died** since the monsoon season began in June."

"**Over 45%** of the country's cotton crops are officially deemed to have been **swept away** by the flooding."

"Nationally, **€2.6 billion worth of cotton might have been destroyed** by the torrential rains"

RIO GRANDE DO SUL, BRAZIL

2024

"More than half a million people have abandoned their homes in search of higher ground and **147 are confirmed to be dead**. Another 127 are reported missing."

"**4,000 fashion-related suppliers** are likely in the affected zone."

MONGOLIA

2023–24

More than two million animals including goats died in Mongolia due to deep snowstorm conditions this past winter.

This has had a devastating effect on the livelihoods of goat herders working in the cashmere industry.

BANGLADESH

2024

"More than 2 million people have been affected by the floods. **At least 31 people have died** in the floods and landslides since May 29"

"With local media reporting an **economic toll of over $11.4 million**."

2024

"Bangladesh **loses US$6 billion a year** in labour productivity due to the effects of extreme heat."

CAMBODIA

2020

79 garment factories were affected by floods forcing 40 of them to halt production.

INDIA & PAKISTAN

2022

"Torrential rains **damaged 80% of the cotton crop** in the Sindh province,

Killed at least 1,700 people,

And caused a damage of **around $15 billion."**

* The Türkiye and Syria Earthquake of 2023 was not directly caused by the climate crisis. However, due to its significant impact, it is included in this report. The earthquake on February 6, 2023, tragically killed 55,000 people and severely affected garment worker communities. Transparent data via the Open Supply Hub revealed that the location of the earthquake impacted thousands of mostly apparel, textile, footwear and leather production facilities in the area, highlighting the responsibility of major fashion brands sourcing from the region to support relief and recovery.

ANALYSIS
JUST TRANSITION

What does a Just Transition look like for workers?

It is now beyond urgent that major fashion brands take action to enable a Just Transition for workers and ensure that climate vulnerabilities are addressed without worsening human rights. A Just Transition fund to support affected stakeholders has been implemented in other sectors and could provide some much-needed relief for garment workers facing hardship. However, this would only be a partial solution.

Given that the frequency and intensity of disasters is forecast to increase, sporadic and irregular charity donations will fall short on what is truly needed – systemic worker resilience. Specifically, in the context of production countries having very little social protection schemes for workers, the best mechanisms for brands to enable a Just Transition for workers are:

- **Enabling the payment of living wages.**
  The rationale for living wages (as a minimum standard) and ending systemic poverty pay in fashion is extensive and well-documented. In the context of climate disasters disrupting garment production, living wages prevent workers from falling into extreme poverty by enabling them to put savings aside for emergencies.
- **Genuine social dialogue.**
  The climate crisis ought to be an opportunity to make long-needed structural changes and finally ensure the voices of workers are truly heard. Consulting with independent, democratically-elected trade unions to ensure workers are involved in making decisions that affect them and co-creating solutions is key to equipping workers with climate resilience in anticipation of disasters. Ensuring that workers have sufficient bargaining strength is key to enable them to demand infrastructures and systems that workers need such as plentiful drinking water and effective cooling systems. The outcomes of this could include collective bargaining agreements that safeguard workers during transitions, the implementation of essential social protection schemes, and the upskilling of workers to adapt to new technologies. Such protections should include context-specific mitigations co-created with workers. For example, SEWA (Self Employed Women's Association), a union in India which organises women workers, including home-based workers in the garment industry recently launched a heat wave insurance programme for its members. Additionally, responsive support for workers affected by the climate crisis may involve assistance with relocation when necessary or compensation for loss and damage resulting from climate-related impacts.

Brands must start to treat suppliers as partners rather than just as vendors.

Brands and retailers are indisputably the most powerful actors in the fashion supply chain. By design, most do not own the factories where their products are made. As outlined elsewhere in this report, 96% of carbon emissions in fashion are at manufacturing level. Transformers Foundation, which represents suppliers in the denim industry, has argued that the concentration of emissions, combined with the lack of direct responsibility on the part of brands, means that responsibility for climate action in fashion is not shared, it is largely approached as a supplier problem.

The group is among those who have highlighted the need for brands to be less directive and top down in working to decarbonise supply chains, particularly in setting targets.

While brands often pay lip service to working in 'partnership' with suppliers, our findings are that just 3% of brands disclose how suppliers were consulted in the establishment of climate targets that impact their supply chains. This indicator specifically looks at targets to reduce greenhouse gas emissions (mitigation). Given that the burden for doing the work of decarbonisation falls on suppliers, it is short-sighted if brands are failing to consult them about targets. However, more worryingly, it does not inspire confidence that the targets being set by brands are truly achievable if they are not grounded in the supply chain realities. Moreover, gaining buy-in from suppliers is likely to improve their implementation.

> Just 3% of brands disclose how suppliers were consulted in the establishment of climate targets that impact their supply chains

We also found that 93% of brands do not disclose if they are engaging with suppliers on climate adaptation i.e. investing in protections needed across garment supply chains to navigate climate hazards. For example, we are looking for disclosure on how brands engage with suppliers on adapting facilities to an increase in natural hazards (e.g. flood defences in a factory). The lack of transparency here suggests that decision-making and target-setting continue to be top-down from brands rather than the more balanced partnership suppliers are calling for.

What does a Just Transition look like for suppliers?

Brands have gleaned the most profit from an industry powered by fossil fuels, so they bear the greatest responsibility for funding the just transition and ensuring the well-being of workers and others affected. The largest burdens faced by suppliers when it comes to adopting new technologies or mitigating the impacts of the climate crisis are financial. Suppliers face significant financial burdens when adopting new technologies or mitigating the impacts of the climate crisis. Those operating on thin profit margins are often reluctant to make expensive investments that do not offer short-term returns, especially when brand commitments remain uncertain. As we shared previously, there may be some cultural and religious reluctance to accrue debts among some suppliers who have proudly built their businesses up with cash, not debt. This reluctance is compounded by fashion brands' exploitative purchasing practices, which make it difficult for suppliers to repay loans if brands push prices too low or stop buying. While training and upskilling programmes are commonplace and can be helpful to suppliers, it is indisputable that the primary need of suppliers is shared or full financial investment by brands to support the Just Transition.

A Just Transition for suppliers must include:

- **Shared or full investments** in renewable energy infrastructure such as solar panels. This also extends to investments in infrastructure to improve working conditions in response to the impacts of climate change i.e. air conditioning to manage heat levels in wet processing facilities.
- **Supportive purchasing practices** that are aligned with sustainability goals that address power imbalances. Fair costings from brands and stable, long-term commitments are all needed if suppliers are to invest in renewable energy and enable living wages for garment workers. Suppliers also need responsive support when impacted by climate hazards such as compensation, and an end to 'cut and run' policies. Absorbing price surges or losses related to decarbonisation including transitional supports so that suppliers do not suffer financial losses while making environmental upgrades is key to suppliers making changes i.e. brands financially supporting farmers so they don't make a loss as they make the transition to organic cotton.
- **Genuine consultation** and collective goal-setting amongst brands and suppliers, particularly on climate targets.

ANALYSIS

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

Freedom of association empowers workers to advocate for their collective rights during the green transition. Brands must actively help, not hinder it.

Freedom of association and collective bargaining are enshrined in international human rights, the International Labour Organization (ILO)'s conventions and many national labour laws. These enabling rights play an indisputable role in unlocking fair pay and good working conditions and as outlined earlier, are essential to ensuring that workers' needs are not overlooked in the fight against the climate crisis.

For the last seven years, the Global Fashion Transparency Index has consistently found that a majority of big brands disclose a commitment to freedom of association. Typically, it is found in their codes of conduct. This year we found that 84% of brands disclose their commitment to freedom of association, which is a similar level to last year (85%). Although brands broadly endorse these rights, there is a notable lack of evidence showing these policies in action. For example, the presence of independent trade unions within a brand's supply chain would indicate successful implementation of its commitment to freedom of association. However, just 19% of brands disclose the number of their supplier facilities that have independent, democratically elected trade unions – a slight increase from 15% of brands last year.

Another sign that policies on freedom of association are impactful to workers is the presence of collective bargaining agreements, negotiated by unions and employers, that achieve better working conditions and pay. However, just 14% of brands disclose the number or percentage of suppliers that have collective bargaining agreements, a slight increase from 12% last year.

Although brands broadly endorse these rights, there is a notable lack of evidence showing these policies in action

These incremental improvements in brand disclosure are welcome, but they are neither widespread nor rapid enough to be significant. Brands have a responsibility to ensure that the independent worker representation and negotiation they claim to support is happening within their supply chains. The low levels of disclosure on freedom of association do not instil confidence that brands are genuinely committed to their stated commitments. Recent research by the Business and Human Rights Resource Centre (BHRRC) also supports this, finding that some fashion brands and suppliers are employing "weak and bogus" representative structures, including worker committees and "yellow" (non-independent) unions, to appear to fulfil brand requirements of freedom of association. This is harmful as it perpetuates an exploitative model which restricts worker rights and maintains low wages throughout the fashion supply chain. As BHRRC's research reminds us: "Independent trade unions achieve gains for workers that alternative structures cannot." Brands have a vital role to play in enabling meaningful collective bargaining.

On top of an already challenging landscape, the erosion of democratic rights in production countries, compounded by geopolitical challenges such as war and the pandemic, has further restricted workers' ability to collectively organise on working conditions and pay. Additionally, the on-paper commitments to freedom of association are increasingly undermined by brands' sourcing strategies as many major fashion brands predominantly produce in countries that are fragile democracies, if democracies at all. In these countries, workers' rights to organise, collectively bargain and secure better conditions for themselves are extremely repressed. Fashion production countries such as Bangladesh, Myanmar and Türkiye, are named by the International Trade Union Confederation (ITUC) as among the worst countries for working people. This past year has seen high profile union-busting cases in Türkiye. In 2023, wage protests in Bangladesh were met with a brutal crackdown by the national authorities resulting in workers' mass arrests on dubious charges and several workers killed by police. Against this dangerous backdrop, brand inaction on freedom of association is deeply troubling.

There is substantial evidence that brands can play a constructive role in ensuring that workers' voices are heard and rectifying issues such as union busting. As the industry decarbonises and conditions change for workers, the imperative for robust freedom of association for workers is critical – to ensure not just a cleaner but fairer fashion supply chain.

VIEWPOINT

WHEN HOT ISN'T COOL ANYMORE – AN URGENT CALL TO ACTION

GIUSEPPE CIOFFO & PAUL ROELAND

Clean Clothes Campaign

It's becoming abundantly clear that the climate crisis isn't in the future – it is happening now. In many places where fast fashion is made, workers are already feeling the impact. Heatwaves last for weeks, reaching life-threatening highs of 45 °C and above. When the rain falls, it comes down harder and longer than ever, causing entire regions to flood. Hurricanes and sea level rise are a direct threat to low-lying coastal areas.

All of these directly affect garment workers. Heat stress on the factory floor can lead to illness, loss of income, and injury. Flooding forces workers to stay home and lose income as factories are temporarily closed – at a time when their own dwellings are also damaged.

All of this is, by now, well-researched. Yet, whenever we hear about "climate mitigation" by brands, it's usually a few token attempts to appear a tiny bit "greener". Yay, no more plastic bags in our stores! We did an experimental run of sneakers made from pineapple fibres! In short, variations on "*Oh look, a squirrel!*" Some are just bitter, when the maybe-slightly-less-damaging clothes are increasingly transported by air.

While companies embark on pilot projects to reduce carbon emissions and "green" factories, workers still face rights violations. "Green" factories in Bangladesh still harbour labour rights violations, still pollute the rivers and fields that local communities rely on, and lack appropriate ventilation and cooling policies.

Factories need adaptation – with brands providing funding and investment stability, or they will close. That would trigger a new wave of income loss and poverty for workers, as production shifts to areas deemed at lower risk. As the COVID-19 pandemic showed, with many cases of workers being laid off without compensation, the cost is then born by those who can least afford it.

> A fundamental change is needed in how workers are respected, valued, and protected

This report focuses on what brands should do to enable a just transition, respecting the millions of workers that made them rich. We very much welcome this spotlight. However, the results paint a bleak picture: On average, 96% or more of brands do not disclose a Just Transition strategy.

That is not acceptable.

All the fancy words and glitzy forums on decarbonisation and a circular economy cannot hide that fundamental changes are needed. Yes, also on materials, on recycling, on repair. But also a fundamental change in how workers are respected, valued, and protected.

JUST TRANSITION & ADVOCACY

RENEWABLE ENERGY ADVOCACY

ANALYSIS

RENEWABLE ENERGY ADVOCACY

Few brands are using their significant influence to push for legislation supporting a just, clean energy transition.

Big fashion brands hold significant purchasing power which can influence policymakers and governmental policy within the supply chain countries they source from – particularly in countries such as Bangladesh where garment production makes up a significant proportion of GDP. This influence is an opportunity to advance a clean energy transition in garment-producing countries – but the vast majority of brands are failing to disclose evidence of utilising this leverage. The majority of major brands and retailers – 87% – fail to provide evidence of past or present advocacy for renewable energy within their supply chains. Considering that the bulk of brands' greenhouse gas emissions occur in the supply chain, this lack of supply chain advocacy is particularly disappointing. Points were only awarded for advocacy efforts in the supply chain, where renewable energy is typically less available and where the majority of emissions occur. Even fewer brands – a mere 2% – disclose the outcomes of their advocacy efforts. This lack of transparency hinders progress in improving access to renewable energy in manufacturing regions.

Some political outreach work happens via industry associations and multi-stakeholder groups, like the United Nations Fashion Industry Charter for Climate Action, whose work includes organising bilateral discussions between brand signatories, suppliers and government leaders to grow understanding of the political and technical barriers to renewable energy transition and derive solutions – such as green tariff mechanisms, for example.

As outlined in other sections, many garment-producing countries are experiencing the impacts of the climate crisis in their daily lives, with climate hazards increasing in frequency and intensity. Floods destroying entire crops of cotton or heat waves in factories without appropriate ventilation systems are already disrupting fashion supply chains. Garment workers are bearing the brunt of these impacts – without compensation for their crop losses or even facing violence as they struggle to meet their productivity targets due to increased heat-related fainting.

The urgency is further heightened by the top-down pressure garment-producing countries face to decarbonise, adapt, and mitigate the climate crisis. Prioritising high-impact renewable electricity solutions, such as direct Power Purchase Agreements (PPAs) and on-site renewables like solar and battery storage, is crucial for achieving real-world reductions in fossil fuel use. This shift not only improves air quality but also brings significant community benefits to areas surrounding manufacturing sites. However, transitioning to renewable energy remains a significant challenge across manufacturing regions.

On the next page is a brief country-by-country overview of some of the political barriers hindering the clean energy transition along with some actions major fashion brands and retailers are taking to overcome these challenges. Crucially, advocacy often occurs behind closed doors with little disclosure of outcomes. Fashion Revolution is urging brands to be transparent about their advocacy efforts to foster trust, and allow stakeholders to see how brands are actively working towards (or against) the changes they want to see.

Bangladesh

As mentioned earlier, about 11% of Bangladesh's GDP comes from the fashion industry but only 0.36% of the country's energy consumption is from renewable sources. Despite the government's targets to raise renewable energy sources to 40% of total energy by 2041, there are numerous economic, technical, policy and human capacity barriers that are hindering this development. For example, the high cost of photovoltaic technology, lack of infrastructure, innovation, and manpower hinder the growth of renewable energy in the country. Moreover, there are some doubts among policymakers about renewable energy's viability because of its intermittency while subsidies for conventional fuel make renewable energy projects infeasible. In addition, natural disasters, excessive rainfall, floods and riverbank erosion cause significant challenges in producing solar energy because climate hazards damage infrastructure, reduce efficiency and disrupt consistency of power generation. Bangladesh's wind energy potential is relatively limited, with the exception of some coastal places, meaning that production of electricity on a large scale from wind energy is limited or obstructed due to wind speeds that are not strong or consistent enough to generate sufficient power. Grid-scale production is also hampered by insufficient wind speed. H&M and BESTSELLER have joined forces alongside the Global Fashion Agenda to build the country's first offshore wind project – it is currently undergoing a feasibility study. If approved, construction would begin in 2028 and reduce CO2 emissions by approximately 725,000 tons annually.

Vietnam

Similarly, in Vietnam, 16% of GDP comes from textile exports. The energy mix in Vietnam is predominantly coal-based. However, some major brands and retailers are advocating for the development of an ambitious Power Development Plan VIII (PDP8). The Joint Statement of Support in Vietnam emphasises the need for policy frameworks that encourage private sector investment in renewable energy, aiming to accelerate Vietnam's transition to a clean and sustainable energy sector. The goal of the plan is to double national electricity output and reduce dependence on fossil fuels. In addition, USAID is leading the Vietnam Low Emission Energy Programme (V-LEEP) which aims to support Vietnam's transition by improving energy planning, increasing the deployment of advanced energy systems, and mobilising private sector investment in renewable energy, such as rooftop solar. A few brands included in this research received points for their advocacy on this.

China

As the world's largest textiles exporter, China's textile industry heavily relies on coal and natural gas power plants. As such, the country's adoption of renewable energy plays a pivotal role in transitioning the industry to renewable energy. However, Power Purchase Agreements are unevenly available in China. Some brands included in this research disclose that they are advocating for corporate PPAs in China.

Indonesia

In Indonesia, transparent brand advocacy is exemplified by the Statement of Mutual Aspiration: Supporting Renewable Energy Procurement for Commercial and Industrial Sectors, organised by the Clean Energy Investment Accelerator. This initiative is endorsed by a few brands included in this research. The letter supports renewable energy advancement and expresses a willingness to collaborate with the Indonesian government, financial sector, and other stakeholders to achieve shared energy goals, fostering a policy framework that promotes scaling renewable energy use.

ANALYSIS

RENEWABLE ENERGY ADVOCACY

Impact of Global Net-Zero Legislation on Garment Production

Global legislation to achieve net zero will increasingly impact garment-producing countries and how they produce our clothes, by pushing them to reduce their carbon footprint – despite many contributing less to the crisis. For instance, the EU's Generalised Scheme of Preferences (GSP) provides reduced tariffs to countries that comply with human rights and environmental standards. However, the Carbon Border Adjustment Mechanism (CBAM) aims to tax carbon-intensive imports, potentially burdening garment exporters in the Global South with higher costs and economic challenges.

> As brands chase the bottom line, sourcing from other countries may lead to reduced demand and job losses in garment-producing countries without as much access to clean energy

Although it does not yet apply to garment imports, this policy could be particularly harmful. Importing textile and garment products into the EU from countries without renewable energy access will become more expensive for brands. As brands chase the bottom line, this may lead brands to prioritise sourcing from other countries (perhaps moving production onshore where renewable energy is available), thus leading to reduced demand and job losses in garment-producing countries without as much access to clean energy. Given the urgent need for renewable energy in garment-producing countries, forthcoming legislation penalising exports, and government crackdowns on trade unions and workers, brands must advocate for a just and fair transition to policymakers globally.

Enhancing clean energy access for local communities in manufacturing regions

According to the International Energy Agency's World Energy Outlook, one billion people – 13% of the global population – live with no access to electricity, mostly in Africa and South Asia. This lack of access can result in inadequate heating, lighting, and power for essential appliances, adversely affecting health, education, and economic opportunities. Lack of access to reliable energy often disproportionately affects low-income households and rural areas, limiting their ability to improve their living standards and overall quality of life.

Whilst direct Power Purchase Agreements (PPAs) are the most transformative solutions, this is an option not commonly available in emerging markets. Where there are gaps in availability, major retailers could consider investing in community-based renewable energy generation, which is crucial for a just, clean energy transition. Investments by major corporations into decentralised energy credits would count towards their net-zero goals but experts believe that decentralised energy credits are more impactful than RECs because they are more transparent and traceable.

Positive examples of this approach exist in other industries. In South Korea, where PPAs are hard to obtain, an internet corporation partnered with 60 Hertz, a social venture, to boost renewable energy access in Gyeonggi-do Province by purchasing solar energy from local citizens instead of a utility company that may still operate using fossil fuels. This method means that the province provides the renewable energy certificates, bypassing Korea's bureaucratic system, and enabling local communities to use clean energy democratically, overcoming the country's restrictive renewable energy policies.

In India, erratic power supply, high power tariffs and limited access to modern technology have adversely impacted rural garment workers. To overcome this, the central government recently released a national framework to promote decentralised renewable energy (DRE) in India, which would make rooftop solar panels, micro or mini-grids and rechargeable batteries and increase access to affordable, reliable and clean energy services in India.

> There are transition pathways that benefit local communities and contribute to residential decarbonisation

While the most transformative policy change that brands should prioritise is the implementation of PPAs, there are transition pathways, such as the solutions found in Korea and India, that benefit local communities and contribute to residential decarbonisation. There is some concern that they might enable companies to claim 100% renewable energy use while still burning fossil fuels, as the energy may not directly power their operations in that country. However, decentralised energy initiatives, such as the projects in South Korea and India, can play a role in bridging gaps where Power Purchase Agreements (PPAs) are unavailable.

JUST TRANSITION & ADVOCACY

RIGHTS-RESPECTING TECHNOLOGIES

ANALYSIS

RIGHTS-RESPECTING TECHNOLOGIES

The Human and Environmental Cost of Transition Minerals & 'Green' Technologies

To achieve global emissions reduction targets, significant investments in renewable energy—primarily wind and solar—are essential. This has already triggered growing demand for unprecedented mining for transition minerals. Take, for example, copper and copper alloys. Due to its conductive properties, it is often used in power generation – including in wind turbines and solar panels. For example, wind turbines utilise copper to transmit electricity from the turbine to the grid whereas solar panels use copper in the conductive layer of photovoltaic cells (to capture and transfer electricity) – among other uses.

Demand for copper has almost doubled in the last 20 years to 20 million tonnes in 2019. Research predicts that the building of wind turbines between 2018 and 2028 will use 5.5 million tonnes of copper. The potential for impact from copper mining is immense. Take, for example, the Grasberg copper and gold mine in West Papua. Extraction has caused the pouring of waste, estimated to be up to *280,000 tonnes per day*, into the local river system. This has been going on for almost half a century and has caused or exacerbated conflict with the local Amungme population, leading to the deadly militarisation of the area.

To put the issue to scale, the International Energy Agency estimates that we need to extract six times more critical minerals like cobalt, lithium, nickel, rare earths and copper by 2040. This is underscored by the fact that The Sustainable Metals Institute has revealed that over half the known global reserves of transition minerals lie on or near Indigenous peoples' territories and peasant communities–custodians of these last lands. Crucially, the rights of Indigenous people to consultation and free prior informed consent are embedded in United Nations declarations.

Fashion Revolution acknowledges the widespread human rights abuses within transition mineral supply chains – in places including the Democratic Republic of Congo, the Philippines, Zambia and many more – the world over. Crucially, at least 1,390 environmental defenders have been killed between the adoption of the Paris Agreement on 12 December 2015 and 31 December 2022.

> At least 1,390 environmental defenders have been killed between the adoption of the Paris Agreement on 12 December 2015 and 31 December 2022

While this research focuses exclusively on the human rights abuses associated with the assembly of solar panels, it's crucial to recognise that the exploitation starts much earlier in the supply chain, beginning at the site of extraction. This early-stage exploitation lays the groundwork for the entire system. Therefore, achieving a just energy transition will also mean that the extractive industry will need to fundamentally change. Stronger regulation is essential to minimise the human and environmental impacts of mining for transition minerals critical to the energy transition. It is crucial for world leaders, policymakers, and the extractive industry to listen to the voices of those most affected in the local communities of impacted countries.

The fashion industry must ensure that its transition to renewable energy is not at the expense of human rights.

The fashion industry must ensure that its shift to renewable energy does not come at the expense of human rights or leave affected communities behind. The essence of a Just Transition is to address the climate crisis urgently, such as by adopting renewable energy, while being mindful of and supporting the communities impacted by this change.

Garment manufacturing mostly takes place in sunny climates and very often in single-storey, purpose-built buildings with ample roof space for solar panels particularly at cut and sew level. However, this essential shift to solar is complicated by the heavy reliance on the Uyghur Region in Northwest China, which produces between one-third and one-half of the world's solar-grade polysilicon. In the region, the Chinese government subjects Uyghurs and other Turkic and Muslim-majority peoples to an unprecedented system of state-imposed forced labour. An estimated 1 million to 1.8 million people are subjected to forced labour, including detainee labour in internment camps and prisons, as well as mass involuntary labour transfers. The very nature of the state-imposed abuse makes it impossible for brands to ensure that any workplace in the Uyghur Region is free of forced labour. In addition, the region's 'green' technology industry is heavily reliant on coal-based energy, further tainting the solar panels produced in the region.

Our research finds that just two brands out of the 250 researched, OVS and United Colors of Benetton, are disclosing information about this issue. We look for a public commitment to ensure that suppliers transitioning to renewable energy do not procure solar panels made with high-risk of State-Imposed Forced Labour. The widespread lack of transparency on this issue across the fashion industry demonstrates the

urgent need for greater awareness among brands. Given the severity of these crimes, it is imperative for brands to take responsibility and avoid complicity. Although some brands may currently be unaware, our aim is to eliminate any excuse for inaction by surfacing these risks directly to major fashion brands through forums such as this report.

The fashion industry's transition to renewable energy does not need to be facilitated by grave human rights abuses. A growing body of research from academia and civil society is offering education and guidance for brands on this issue. Tools like Supply Trace are also helping to expose links between forced labour in the Uyghur Region and apparel supply chains.

Fashion industry stakeholders have a responsibility to deepen their understanding of the risks around solar panel procurement and engage with expert groups such as The Coalition to End Forced Labour in the Uyghur Region and Anti-Slavery International to work on solutions. Given the purchasing power of the fashion industry as a buyer of solar technology, fashion brands and suppliers wield significant commercial and political influence. There is an enormous opportunity for the fashion industry, particularly if brands act collectively, to put pressure on governments and investors to divest from the Uyghur Region and diversify sourcing locations. This would ensure an ethical and stable supply of inputs for solar technology.

"For people and the planet, we urgently need to transition away from fossil fuels to clean energy, and the solar industry is critical to this transition. But we cannot allow this crucial transition to be built on an acceptance of and complicity in human rights abuses. Currently, the global supply of solar panels relies heavily on Uyghur forced labour. The fashion sector, as a huge buyer and user of electricity globally, is a key actor to facilitate a truly just and fair transition. In the absence of effective preventative measures, the sector risks facilitating profit from Uyghur forced labour through solar procurement. The fashion sector must urgently step up and conduct due diligence on its procurement of solar panels, alongside the necessary measures to prevent the use of Uyghur forced labour in its own products."

Chloe Cranston
Head of Thematic Advocacy Programmes,
Anti-Slavery International

RECOMMEN-DATIONS

TAKING ACTION ON DECARBONISATION

WHAT NEEDS TO HAPPEN NEXT?

The fashion industry needs to decarbonise – fast. This requires major fashion brands to fund the transition to renewable energy sources in the supply chain, with a particular focus on phasing out coal at the manufacturing level. To enable this transition, this report calls on major fashion brands to invest at least 2% of their annual revenue on a fair transition to power fashion's supply chain in a clean way.

This transition requires greater transparency from major fashion brands on their investments to decarbonise their supply chain and what they are doing to help their suppliers both technically and financially to achieve this goal. Transparency is a powerful tool for driving the decarbonisation of the fashion industry, fostering accountability, building trust, encouraging collaboration in fashion's shared facilities, ensuring regulatory preparedness, and empowering stakeholder scrutiny and activism. By being transparent, fashion brands can more effectively reduce their carbon footprint and contribute to a more sustainable industry.

We want to see an industry that invests in a just, clean and fair transition across the entire value chain. Transparency is an essential first step towards making change in the global fashion industry. By asking brands to be more transparent, we can hold them to account on their decarbonisation efforts and push them to do better.

FOR MAJOR BRANDS AND RETAILERS, THIS MEANS:

First and foremost, investing at least 2% of their annual revenues into their decarbonisation and Just Transition efforts

- Producing less products and committing to degrowth
- Committing to robust, near and short-term targets for the reduction of scope 3 absolute emissions including a target for phasing out thermal coal and other fossil fuels
- Disclosing detailed decarbonisation plans including targets and actions co-created with suppliers and other affected stakeholders
- Committing to 100% renewable energy (wind and solar) in the supply chain by 2030
- Disclosing 100% of processing facilities
- Advocating to policymakers in garment-producing and importing countries to enable renewable energy production and access
- Collaborating with decarbonisation experts, civil society such as trade unions and NGOs, to boost knowledge and technical skill sets for delivering decarbonisation
- Ensuring your executives are financially incentivised to help meet your decarbonisation goals
- Decarbonising collectively by engaging with, co-funding and aligning with other brands, particularly those with whom you share suppliers

FOR CITIZENS, THIS MEANS:

- Not using this research to inform your shopping choices but rather using these findings to inform your activism. Scrutinise the claims made by major brands and hold them to account
- Calling on major brands and retailers to invest at least 2% of their annual revenues into their decarbonisation and Just Transition efforts
- Calling on major brands and retailers to work with their suppliers to ensure they are co-creating their decarbonisation targets and actions
- Calling on policymakers in both garment-producing and importing countries to push for renewable energy production and access

FOR POLICYMAKERS, THIS MEANS:

- Referring to the methodology and findings in this report to the drafting of any relevant forthcoming transparency requirements, particularly considering the areas in which there is little voluntary disclosure
- Enhancing regulation and policies by implementing stronger requirements that require a fair transition to renewable energy access in the global fashion industry
- Increasing government investment in renewable energy transition and enacting supporting legislation to unlock further funding
- Engaging with major brands and retailers as well as international investors to support renewable energy initiatives throughout the supply chain
- Strengthening enforcement and sanctions of existing laws, including sanctions on environmental issues that relate to the global fashion industry
- Creating incentives for more equitably distributed financial risk across value chains
- Creating incentives for fairer brand purchasing practices and long-term sourcing commitments, which are the bedrock of a just renewable energy transition in the fashion industry

FOR INVESTORS AND SHAREHOLDERS, THIS MEANS:

- Using this data and other credible resources to engage major brands and retailers and steer them towards a just, clean energy transition, reinforcing the demands put to brands. In particular:
  - promoting the capital allocation of brands towards at least 2% of annual revenues investment in the renewable energy transition
  - calling for board level accountability on achieving 1.5°C aligned decarbonisation targets and demanding that executive pay is tied to meeting carbon net zero targets
  - demand that the board has expertise on the complexities and nuances to decarbonise across global supply chains
- Directly funding and co-funding renewable energy and decarbonisation projects as well as Just Transition efforts and initiatives within the fashion supply chain
- Responding to and dismantling market barriers that impede access to much-needed finance for supply chain decarbonisation efforts while scaling up access to existing finance mechanisms (that aren't debt-based)
- Conducting and responding to risk assessments within the fashion supply chain focused on brand actions on decarbonisation

FOR CIVIL SOCIETY, JOURNALISTS AND ACADEMICS, THIS MEANS:

- Using this data and findings to scrutinise and verify the public claims made by major brands and hold them to account
- Referring to the methodology and findings in this report in coverage of any relevant forthcoming transparency requirements, particularly considering the areas in which there is little voluntary disclosure
- Using this data to collaborate with other stakeholders and brands themselves to address issues found in supply chains and prevent them in the future
- Standing together in calling for major brands and retailers to commit to invest at least 2% of their revenues into renewable energy and to push for mandatory legislation promoting renewable energy production and access, including in major garment-producing countries

ANNEX

FULL METHODOLOGY & SCOPE OF RESEARCH

HOW BRANDS AND RETAILERS ARE SELECTED

What Fuels Fashion? reviews and ranks 250 of the world's largest and most influential fashion brands and retailers based on the following criteria:

- **Annual turnover**: Over USD 400 million*
- **Market segments**: Includes high street, luxury, sportswear, accessories, footwear, and denim
- **Geographic spread**: Represents brands from Europe, North America, South America, Asia, and Africa

As major brands in the apparel industry, these retailers have significant negative human rights and environmental impacts and bear an outsized responsibility to drive transformative change. With some of the wealthiest owners and CEOs, these brands have the resources and moral imperative to take meaningful action on transparency and climate impacts, including improving human rights and environmental practices at the core of their business models.

We list brand names rather than parent company or controlling group names for public familiarity. For brands part of larger groups (e.g., H&M Group, Inditex, PVH), scores reflect all brands within the group unless disclosure varies, in which case scores are disaggregated by brand.

*__Note__: For privately held brands, turnover estimations are based on publicly available information.

WHAT DOES BRAND PARTICIPATION MEAN?

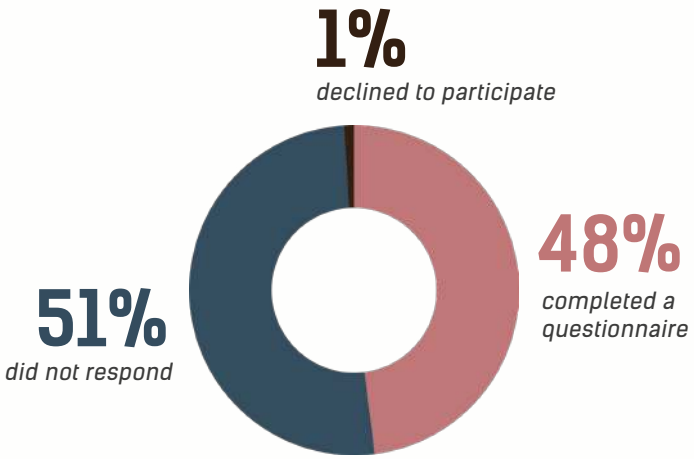
This year, 48% of the reviewed brands and retailers participated by returning a completed questionnaire.

We include all brands in our research, whether they participate or not, and treat them equally. However, participating brands typically score higher as they can highlight relevant disclosures our researchers may have missed or provide additional information.

Fashion Revolution contacts all 250 brands annually at the start of the research cycle. Brands are informed of methodology updates and invited to participate.

Participation involves brands reviewing their pre-filled questionnaires, filling in any public disclosure we missed, and responding to researcher queries. This process helps brands improve their disclosures and aligns them with industry best practices. As a result, participating brands typically receive higher scores year-on-year.

HOW MANY BRANDS PARTICIPATED THIS YEAR?



A–Z OF BRANDS

● participated in brand questionairre

Abercrombie & Fitch (Ambercrombie & Fitch) ●
Adidas (Adidas AG) ●
Aeropostale (Authentic Brands Group LLC)
AJIO (Reliance Retail)
ALDI Nord (ALDI Einkauf GmbH & Co. oHG)
ALDI SOUTH (ALDI Einkauf GmbH & Co. oHG)
ALDO (The Aldo Group Inc.) ●
Amazon (Amazon.com, Inc.)
American Eagle ●
ANTA
Anthropologie (URBN) ●
Aritzia ●
Armani (Giorgio Armani S.p.A)
Asda (George.) (TDR Capital) ●
ASICS ●
ASOS ●
Balenciaga (Kering) ●
Bally (JAB Holding Company) ●
Banana Republic (Gap Inc.)
BCBGMAXAZRIA (Marquee Brands)
Beanpole (Samsung C&T)
Belle
Bershka (Inditex) ●
Big W (Woolworths Group) ●
Billabong (Boardriders)
Bloomingdale's (Macy's Inc.)
Bonprix (Otto Group) ●
boohoo (Boohoo group plc) ●
Bosideng
Bottega Veneta (Kering) ●
Brooks Sports (Berkshire Hathaway) ●
Brunello Cucinelli
Buckle
Burberry ●
Burlington
C&A ●
Calvin Klein (PVH) ●
Calzedonia (Calzedonia Group) ●
Canada Goose ●
Carhartt
Carolina Herrera (Puig)
CAROLL (Vivarte)
Carrefour
Carter's (Carter's Inc) ●
CELINE (LVMH)
celio
Champion (HanesBrands Inc.) ●
Chanel
Chico's
Chloé (Richemont)
Clarks
COACH (Tapestry, Inc.) ●
Columbia Sportswear ●
Converse (Nike, Inc.) ●
Cortefiel (Tendam) ●
Costco
Cotton On (Cotton On Group)
Decathlon (Association Familiale Mulliez) ●
Deichmann
Desigual
Dick's Sporting Goods
Diesel (OTB Group) ●
Dillard's
Dior (LVMH)
Disney (The Walt Disney Company)
DKNY (G-III Apparel Group)
Dolce & Gabbana ●
Dr. Martens (Permira) ●
Dressmann (VARNER) ●
DSW (Designer Brands)
Eddie Bauer (Authentic Brands Group LLC)
El Corte Inglés
Ermenegildo Zegna
Esprit ●
Express
Fabletics
Falabella
Famous Footwear (Caleres)
Fanatics (Kynetic) ●
Fashion Nova
Fendi (LVMH)
Fila
Foot Locker
Forever21
Foschini (TFG) ●
Fossil (Fossil Group, Inc.) ●
Free People (URBN) ●
Fruit of the Loom (Fruit of the Loom) ●
Furla
G-Star RAW ●
Gap (Gap Inc.)
Gerry Weber
Gildan ●
GU (Fast Retailing) ●
Gucci (Kering) ●
GUESS ●
Gymshark ●
H&M (H&M Group) ●
Hanes (HanesBrands Inc.) ●
Heilan Home
Helly Hansen (Canadian Tire Corporation) ●
HEMA
Hermès ●
Hollister Co. (Abercrombie & Fitch) ●
Hudson's Bay (Hudson's Bay Company)
Hugo Boss ●
Intimissimi (Calzedonia Group) ●
Ito-Yokado (Seven & i Holdings Co)
Jack & Jones (BESTSELLER) ●
Jack Wolfskin (Calloway Golf Company)
JD Sports ●
Jil Sander (Onward Holdings) ●
Jockey
Joe Fresh (Loblaw Companies Limited) ●
John Lewis
Jordan (Nike, Inc.) ●
K-Way
Kate Spade (Tapestry, Inc.) ●
Kathmandu ●
Kaufland ●
Kiabi
KiK ●
Kmart (Sear Holdings)
Kmart Australia (Westfarmers)
Kohl's
KOOVS
La Redoute (Galeries Lafayette Group)
Lacoste (Maus Frères) ●
Lands' End ●
LC Waikiki
Levi Strauss & Co ●
Li-Ning
Lidl ●
Lindex (Stockmann Group)
LL Bean
Longchamp
Louis Vuitton (LVMH)
lululemon ●
Macy's (Macy's Inc.)
Mammut (Telemos Capital Limited) ●
Mango ●
Marc Jacobs (LVMH)
Marks & Spencer
Marni (OTB Group) ●
Massimo Dutti (Inditex) ●
Matalan
Max (Landmark Group)
Max Mara
Merrell (Wolverine World Wide, Inc.)
Metersbonwe
Mexx
Michael Kors (Capri Holdings) ●
Miu Miu (Prada Group) ●
Mizuno
Moncler
Monoprix (Groupe Casino)
Morrisons (Nutmeg)
MRP
Muji (Ryohin Keikaku Co.) ●
New Balance ●
New Look ●
New Yorker
Next
Nike (Nike, Inc.) ●
Nine West (Authentic Brands Group LLC)
Nordstrom ●
Old Navy (Gap Inc.)
Otto (Otto Group)
OVS ●
Paris (Cencosud) ●
Patagonia ●
Pepe Jeans
Pimkie
Prada (Prada Group) ●
PrettyLittleThing (Boohoo group plc) ●
Primark (Associated British Foods plc) ●
Prisma (S Group)
Pull&Bear (Inditex) ●
Puma ●
Quiksilver (Boardriders)
Ralph Lauren ●
Reebok (Authentic Brands Group LLC)
REI
Reliance Trends (Reliance Retail)
Reserved (LPP) ●
REVOLVE
River Island ●
Romwe (Shenzen Globalegrow E-Commerce Co., Ltd.)
Ross Dress for Less
Roxy (Boardriders)
Russell Athletic (Fruit of the Loom) ●
s.Oliver ●
Sainsbury's (Tu Clothing) ●
SAINT LAURENT (Kering) ●
Saks Fifth Avenue (Hudson's Bay Company)
Salvatore Ferragamo ●
Sandro (SMCP) ●
Savage X Fenty
Semir (Semir Group)
SHEIN ●
Shimamura (Shimamura Co., Ltd.)
Skechers
Smart Bazaar
Speedo (Pentland Group)
Splash (Landmark Group)
Sports Direct (Frasers Group)
Steve Madden
Stradivarius (Inditex) ●
Superdry ●
Takko ●
Target
Target Australia (Westfarmers)
Tchibo ●
Ted Baker
Tesco (F&F Clothing) ●
Tezenis (Calzedonia Group) ●
The Children's Place
The North Face (VF Corporation) ●
The Warehouse
Timberland (VF Corporation) ●
TJ Maxx (TJX)
Tod's
Tom Ford
Tom Tailor ●
Tommy Bahama (Oxford Industries, Inc.)
Tommy Hilfiger (PVH) ●
TOPVALU COLLECTION (AEON)
Tory Burch
Triumph ●
Truworths
UGG (Deckers Brands) ●
Under Armour
Uniqlo (Fast Retailing) ●
United Arrows ●
United Colors of Benetton ●
Urban Outfitters (URBN) ●
Valentino ●
Van Heusen (Authentic Brands Group LLC)
Vans (VF Corporation) ●
Vero Moda (BESTSELLER) ●
Versace (Capri Holdings) ●
Very (The Very Group) ●
Victoria's Secret (L Brands) ●
Walmart (Walmart Inc.)
Woolworths South Africa (Woolworths Holdings Limited) ●
Wrangler (Kontoor)
Youngor
Zalando ●
Zara (Inditex) ●
Zeeman

ABOUT THE RESEARCH PROCESS

METHODOLOGY ADVISORY COMMITTEE

The methodology for **What Fuels Fashion?** builds off of the Global Fashion Transparency Index methodology that was first created in 2017. Some of the indicators included were formed in previous years.

The methodology was designed in 2017 through a four-month consultative process with a variety of industry experts and stakeholders from academia, the trade union movement, civil society organisations, socially responsible investment, business consulting and journalism. This year we have made significant updates to the methodology in consultation with experts, which included:

Andrew Glumac, CDP

Edward Collins and Faye Holder, Influence Map

Joseph Zacune, Consultant

Killian Daly, Energy Tag

Kim van der Weerd, Transformers Foundation

Kaarina Kolle, European Climate Foundation

Paul Roeland, Clean Clothes Campaign

Rachel Kitchin, Stand.Earth

Ruth MacGilp, Action Speaks Louder

Silke Mooldijk, New Climate Institute

We have strived to align the methodology, so far as possible, with existing international standards and frameworks such as GRI, Open Data Standard, UN Guiding Principles, SDGs, OECD Due Diligence Guidelines, the GHG Protocol and the relevant ILO conventions, as well as other benchmarks and initiatives including ACT, CHRB, Know The Chain, Transparency Pledge and several others. We also collaborate to share research with other benchmarks through our partnership with the open research platform Wikirate.

The weighting of the scores is designed to incentivise detailed, granular public disclosure. The intention is to put the greatest emphasis on results, outcomes, impacts and the most actionable data that can be used by external stakeholders to hold brands to account.

LIMITATIONS OF THE RESEARCH

- Data is as current as of **15th of May 2024.** Brands may have disclosed or retracted information or links to evidence may have moved or stopped working after this date
- Changes to the methodology in 2023 may affect year-on-year comparability of the results. Please make annual comparisons with that in mind.
- Desk-based research relies upon people and that means human errors are possible
- Verification of brands' claims are beyond the scope of this research, only on-the-ground rights holders and experts can hold brands to account when their practices and impacts do not stand up to their claims

We are confident that the methodology is comprehensive and robust when it comes to the public disclosure of actionable information by major brands. Our research team has tried our best to be as thorough, meticulous, objective and consistent as possible across all 250 brands. However, we acknowledge that it can always be improved and welcome your concerns or feedback. You can email us at transparency@fashionrevolution.org.

What Fuels Fashion? covers 71 individual indicators across 250 brands comprising 17,750 data points. If you would like the full methodology, please reach out to transparency@fashionrevolution.org.

HOW WE CALCULATE THE FINDINGS

All scores have been calculated to two decimal places (in the complete data set) and then rounded to the nearest whole percentage point for this report.

To calculate the total score for each brand, we add the score awarded to the brand for the 5 different sections. Each section has a different weight as some sections are worth more points than others:

1 Accountability is worth 15/150

2 Decarbonisation is worth 60/150

3 Energy Procurement is worth 22.5/150

4 Financing Decarbonisation is worth 22.5/150

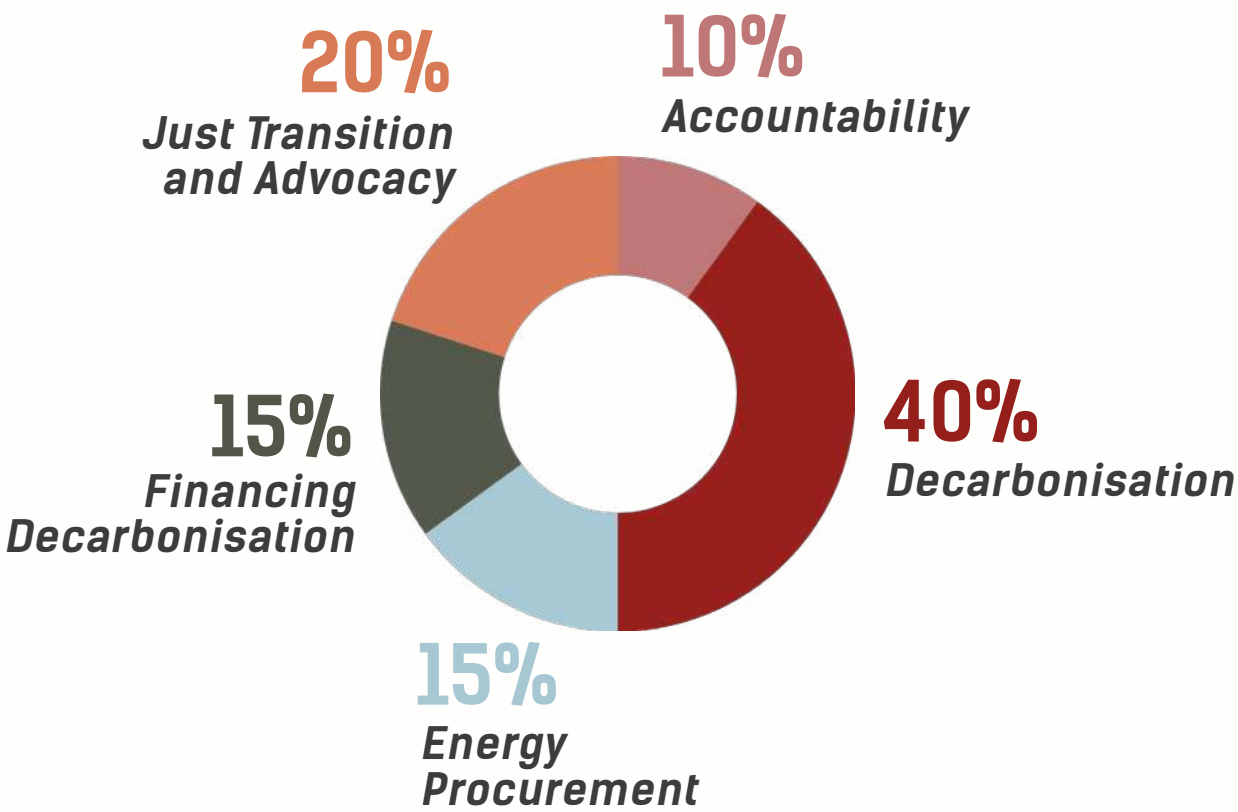
5 Just Transition & Advocacy is worth 30/150

All averages in this report represent the mean.

The overall average score across all 250 brands is calculated by taking the average of all brands' individual final scores. Year-on-year differences in scores are described as the change in percentage points rather than the rate of percentage change. This is true unless explicitly stated otherwise. For instance, if a brand scored 30% in one year and 45% in the next, we are usually reporting that the brand increased by 15 percentage points (45–30=15) rather than saying the brand increased by a 50% rate of change (45/30=1.5).

Where a score may have been rounded to the nearest percentage point in previous editions, we are calculating the year-on-year difference according to the rounded figures rather than to the exact decimal points. For example, where the average score in a particular section is 17.74% we have rounded this up to 18%. If in a previous year's report the average score in that section was 12.41% we rounded it down to 12% in the report. Therefore, the year-on-year difference is technically 5.33 percentage points, but if we go by the nearest rounded figures it is 6 percentage points.

WEIGHTING OF THE SCORES



CREDITS

What Fuels Fashion? was researched and written by Liv Simpliciano, Maeve Galvin, Ciara Barry, Delphine Williot, Isabella Luglio and Ysabl Marie Dobles between January and July 2024. The report was designed by Molly Porteous.

We extend the utmost gratitude to our pro-bono consultation committee, who have been instrumental in guiding our team through this project.

A very heartfelt thanks to the experts who contributed their additional analysis and viewpoints for the report this year.

We extend our gratitude to Malish, Achol, Jahia and Abogo for their valuable contributions. Thank you to the teams at Roots and MADE51, who made this collaboration possible. Additionally, we thank Haleema, Akanksha, Shruti, Hadeel in the Fashion Revolution Global Network for their powerful testimonies.

Thanks also to the entire Fashion Revolution CIC team, especially to Lauren Rees and Molly Porteous for their outstanding support on communications and design, and we would also like to thank Melanie Hughes for her incredible support.

Thanks to all of the representatives from the brands and retailers who participated in the **What Fuels Fashion?** research. Your participation is both vital and appreciated.

What Fuels Fashion? is funded by the Laudes Foundation, Pooled Fund on International Energy (PIE) and Tara Climate Fund. We thank them for their ongoing support.

FASHION REVOLUTION

REFERENCES

REFERENCES

60Hz. (2024). Retrieved from https://60hz.io

ABCA. (n.d.). Retrieved from https://www.abca.com.br/

Adobe Acrobat. (n.d.). Retrieved from https://acrobat.adobe.com/link/track?uri=urn%3Aaaid%3Ascds%3AUS%3A5f29b5fb-e705-45a1-8b24-d61de77d8ddc&viewer%21megaVerb=group-discover

AEG. (2023). **CDP Climate Response**. Retrieved from https://www.aeo-inc.com/wp-content/uploads/sites/4/2023/10/CDP-Climate-Response-2023.pdf

Al Jazeera. (2024, July 10). **Mining for the energy transition needs to respect human rights.** Retrieved from https://www.aljazeera.com/opinions/2024/7/10/mining-for-the-energy-transition-needs-to-respect-human-rights

Amazon. (n.d.). **Path to zero: Fashion industry decarbonisation.** Retrieved from https://www.amazon.co.uk/Path-Zero-Fashion-Industry-Decarbonisation/dp/1032569425#:~:text=This%20book%20serves%20as%20a,emissions%20to%20reach%20Net%20Zero.

Anti-Slavery International. (n.d.). Retrieved from https://www.antislavery.org/

Apparel Impact Institute. (2021). **Roadmap to net zero report 2021.** Retrieved from https://apparelimpact.org/resources/roadmap-to-net-zero-report-2021/

Apparel Impact Institute. (2021). **Roadmap to net zero.** Retrieved from https://apparelimpact.org/wp-content/uploads/2021/11/21_WorkingPaper_RoadmapNetZero_.pdf

Apparel Impact Institute. (2023, June). **Aii roadmap report.** Retrieved from https://apparelimpact.org/wp-content/uploads/2023/06/Aii_RoadmapReport-752.pdf

Apparel Impact Institute. (2024). **Aii concept note for financing climate action.** Retrieved from https://apparelimpact.org/wp-content/uploads/2024/03/Aii-Concept-Note-for-Financing-Climate-Action.pdf

Apparel Impact Institute. (2024). **Fashion climate fund.** Retrieved from https://apparelimpact.org/fashion-climate-fund/

Apparel Impact Institute. (2024). Retrieved from https://apparelimpact.org/

Apparel Impact Institute. (2024). **Unlocking the trillion-dollar fashion decarbonisation opportunity report.** Retrieved from https://apparelimpact.org/resources/unlocking-the-trillion-dollar-fashion-decarbonisation-opportunity-report/

ASICS. (2022). **ASICS sustainability report 2022.** Retrieved from https://assets.asics.com/system/libraries/1577/ASICS%20sustainability%20report%202022.pdf?_ga=2.118593930.2037658980.1709206896-675526302.1709206896

BBC News. (2023). **Sustainable fashion: The environmental impact of cotton.** Retrieved from https://www.bbc.com/news/science-environment-68110310

BBC News. (2023). **Turkey earthquake: What we know about the disaster.** Retrieved from https://www.bbc.co.uk/news/world-europe-62712301

BBC. (2021, February 8). **Covid-19 vaccines and South Africa's new variant**. Retrieved from https://www.bbc.com/news/world-africa-55986356

BBC. (2022, September 1). **Our lives are very worthless: Massive earthquakes devastated a city built for textile and garment workers.** Retrieved from https://www.bbc.com/news/world-europe-62712301

BBC. (2022). Retrieved from https://www.bbc.com/news/world-europe-62712301

BBC. (2023). **Science and environment.** Retrieved from https://www.bbc.co.uk/news/science-environment-68110310

Bestseller. (2023). **Bestseller spreads new year's cheer to seven charity projects.** Retrieved from https://bestseller.com/news/bestseller-spreads-new-years-cheer-to-seven-charity-projects

Better Work. (n.d.). **Greening Viet Nam's textile and garment sector: A high-stakes challenge**. Retrieved from https://betterwork.org/greening-viet-nams-textile-and-garment-sector-a-high-stakes-challenge/

Better Work. (n.d.). **Greening Viet Nam's textile and garment sector: A high-stakes challenge.** Retrieved from https://www.betterwork.org/greening-viet-nams-textile-and-garment-sector-a-high-stakes-challenge/#:~:text=The%20textile%20and%20garment%20industry,polluters%20to%20the%20country%27s%20environment

Benetton Group. (2024). **Sustainability: Company approach**. Retrieved from https://www.benettongroup.com/en/sustainability/company-approach/

Better Work. (2024). **Greening Viet Nam's textile and garment sector: A high-stakes challenge.** Retrieved from https://www.betterwork.org/greening-viet-nams-textile-and-garment-sector-a-high-stakes-challenge/#:~:text=The%20textile%20and%20garment%20industry,polluters%20to%20the%20country%27s%20environment

BGMEA. (n.d.). **A success story: The Bangladeshi garment sector has made remarkable progress in recent years.** Retrieved from https://www.bgmea.com.bd/index.php/page/A_success_story:_The_Bangladeshi_garment_sector_has_made_remarkable_progress_in_recent_years

Bloomberg. (2023, August 18). **Dyeing is fashion's fossil-fueled secret: Startups want to fix it.** Retrieved from https://www.bloomberg.com/news/articles/2023-08-18/dyeing-is-fashion-s-fossil-fueled-secret-startups-want-to-fix-it

Blogs LSE. (2023, March 6). **Heatwaves for the poor: How can Bangladesh deal with it?** Retrieved from https://blogs.lse.ac.uk/southasia/2023/03/06/heatwaves-for-the-poor-how-can-bangladesh-deal-with-it/#:~:text=A%20study%20published%20by%20the,heat%20stress%20from%20extreme%20temperatures

Bonprix. (n.d.). **Positive making: Climate**. Retrieved from https://en.bonprix.de/corporate/responsibility/positive-making/climate/

Boohoo Group. (2023, June). **Boohoo sustainability report.** Retrieved from https://www.boohooplc.com/sites/boohoo-corp/files/2023-06/boohoo-sustainabilty-report-jun-2023.pdf

Business & Human Rights Resource Centre. (2024). **Just for show: Worker representation in Asia's garment sector, the role of fashion brands, and employers.** Retrieved from https://www.business-humanrights.org/en/from-us/briefings/just-for-show-worker-representation-in-asias-garment-sector-the-role-of-fashion-brands-employers/

Business & Human Rights Resource Centre. (2024). **Turkey: Impact of earthquake on garment & textile workers remains unknown as brands are instructed to engage with suppliers' representatives.** Retrieved from https://www.business-humanrights.org/en/latest-news/turkey-impact-of-earthquake-on-garment-textile-workers-remains-unknown-as-brands-are-instructed-to-engage-with-suppliers-representatives/

Capri Holdings Limited. (2024, December 13). **Capri Holdings Limited fiscal 2024 second quarter results**. Retrieved from https://s22.q4cdn.com/557169922/files/doc_downloads/2023/12/13/Dec-12_2024_Capri.pdf

Carter's. (2023). **Corporate Social Responsibility Report.** Retrieved from https://www.carters.com/on/demandware.static/-/Sites-Carters-Library/default/vf7f4e298c7553ed307447d13f13e7be0fca94bce/PDF/carters/Carters_CSR_May_17_10a.pdf?version=1,715,187,749,393

CDP. (2023). **VF Corporation CDP disclosure.** Retrieved from https://www.cdp.net/en/formatted_responses/responses?campaign_id=83630982&discloser_id=1037650&locale=en&organization_name=VF+Corporation&organization_number=22872&program=Investor&project_year=2023&redirect=https%3A%2F%2Fcdp.credit360.com%2Fsurveys%2F2023%2Fjwbhd7d6%2F294779&survey_id=82591262

CDP. (2024). Retrieved from https://www.cdp.net/en

CE Buyers. (n.d.). Retrieved from https://cebuyers.org/

Centre for European Reform. (2021). **EU's carbon border adjustment mechanism: How to make it work.** Retrieved from https://www.cer.eu/publications/archive/policy-brief/2021/eus-carbon-border-adjustment-mechanism-how-make-it-work

Changing Markets Foundation. (2023). **Dressed to kill: Fashion brands' hidden links to Russian oil in a time of war.** Retrieved from https://changingmarkets.org/report/dressed-to-kill-fashion-brands-hidden-links-to-russian-oil-in-a-time-of-war/

Chatham House. (2017). **The impacts of demand for woody biomass for power and heat on climate and forests.** Retrieved from https://www.chathamhouse.org/2017/02/impacts-demand-woody-biomass-power-and-heat-climate-and-forests

Clean Clothes Campaign. (2024). **The impact of the earthquake on textile and garment workers.** Retrieved from https://cleanclothes.org/file-repository/the_impact_of_the_earthquake_on_textile_and_garment_workers_ss.pdf

Clean Clothes Campaign. (2024). **Union busting.** Retrieved from https://cleanclothes.org/union-busting

Climate Action 100+. (2021, October). **Benchmark indicators.** Retrieved from https://www.climateaction100.org/wp-content/uploads/2021/10/Climate-Action-100-v1.1-Benchmark-Indicators-Oct21.pdf

Clothing Research OsLOMet. (2023, March). **Briefing paper TPR QA.** Retrieved from https://clothingresearch.oslomet.no/wp-content/uploads/sites/1026/2023/03/Briefing-paper-TPR-QA.pdf

CNN. (2024, June 22). **Bangladesh flooding: Sylhet climate impact.** Retrieved from https://edition.cnn.com/2024/06/22/asia/bangladesh-flooding-sylhet-climate-intl-hnk/index.html

CNV Internationaal. (2024). **Alarm bells for garment workers in Cambodia: An urgent call to action for improved living conditions.** Retrieved from https://www.cnvinternationaal.nl/en/topical/news/alarm-bells-for-garment-workers-in-cambodia-an-urgent-call-to-action-for-improved-living-conditions

Corporate Lululemon. (2022). **Impact report**. Retrieved from https://corporate.lululemon.com/~/media/Files/L/Lululemon/our-impact/reporting-and-disclosure/lululemon-2022-impact-report.pdf

Creative Commons. (2024). **Attribution-NonCommercial-NoDerivs 4.0 International (CC BY-NC-ND 4.0).** Retrieved from https://creativecommons.org/licenses/by-nc-nd/4.0/

Creative Salon. (2024). **Vanish partners with British Fashion Council.** Retrieved from https://creative.salon/articles/work/vanish-partners-with-british-fashion-council

Datacenter Dynamics. (2024). D-RECs: **Power investments that wire up the developing world.** Retrieved from https://www.datacenterdynamics.com/en/analysis/d-recs-power-investments-that-wire-up-the-developing-world/

Degrowth. (2024). Retrieved from https://degrowth.info/

Desigual. (2022). **Corporate sustainability report.** Retrieved from https://www.desigual.com/on/demandware.static/-/Library-Sites-DsglSharedLibrary/default/dw14a4ae1e/docs/corporate/LoveTheWorld/Corporate_DesigualMemoriaDeSostenibilidad_2022_EN.pdf

Drive. (n.d.). **Not fit for purpose.** Retrieved from https://drive.google.com/file/d/1ZzGAlw2W1FK5GrOJzzjGvoXsyzAyZkQa/view

Dropbox. (2024). **SBTi staff response to the board of trustees April 9 statement.** Retrieved from https://www.dropbox.com/scl/fi/gvjkqr4k4cdtt57qit9s6/SBTi-Staff-Response-to-the-Board-of-Trustees-April-9-Statement.pdf?rlkey=o38yubknqezjqzim44wjtk5fb&e=1&dl=0

Earthsight. (2024). **Fashion crimes.** Retrieved from https://www.earthsight.org.uk/fashion-crimes

Ecostandard. (2024, July). **Joint CSO Statement.** Retrieved from https://ecostandard.org/wp-content/uploads/2024/07/Joint-CSO-Statement-Offsetting2.pdf

Ecotextile. (2024, March 13). **Textile firms drop SBTi scope 3 commitments.** Retrieved from https://www.ecotextile.com/2024031331807/social-compliance-csr-news/textile-firms-drop-sbti-scope-3-commitments.html

El Corte Inglés. (2023). **Informe no financiero.** Retrieved from https://www.elcorteingles.es/recursos/informacioncorporativa/doc/portal/2023/07/24/informe-no-financiero-en72883.pdf

Ellen MacArthur Foundation. (2024). **The fashion remodel: Overview.** Retrieved from https://www.ellenmacarthurfoundation.org/the-fashion-remodel/overview?utm_campaign=fashion-remodel-24&utm_medium=referral&utm_source=press_release&utm_content=link/fashion&utm_term=PRACTITIONERS/intermediate

Ember Climate. (2024, May). **Report: Global Electricity Review 2024.** Retrieved from https://ember-climate.org/app/uploads/2024/05/Report-Global-Electricity-Review-2024.pdf

EnergyTag. (2024). **Electrification of heating in the textile industry**. Retrieved from https://static1.squarespace.com/static/5877e86f9de4bb8bce72105c/t/638d6b730356aa0ac4620610/1670212494724/Electrification+of+Heating+in+the+Textile+Industry..pdf

End Uyghur Forced Labour. (n.d.). Retrieved from https://enduyghurforcedlabour.org/

EnergyTag. (n.d.). Retrieved from https://energytag.org/

Equaltimes. (2024). **Our lives are very worthless.** Retrieved from https://www.equaltimes.org/our-lives-are-very-worthless?lang=en#:~:text=Massive%20earthquakes%20that%20devastated%20a,by%20the%20Clean%20Clothes%20Campaign

Equal Times. (n.d.). **Between war and the recent.** Retrieved from https://www.equaltimes.org/between-war-and-the-recent

Equal Times. (n.d.). **Our lives are very worthless.** Retrieved from https://www.equaltimes.org/our-lives-are-very-worthless?lang=en#:~:text=Massive%20earthquakes%20that%20devastated%20a,by%20the%20Clean%20Clothes%20Campaign

Europarl. (2024). **Parliament wants to improve consumer protection against misleading claims.** Retrieved from https://www.europarl.europa.eu/news/en/press-room/20240308IPR19001/parliament-wants-to-improve-consumer-protection-against-misleading-claims#:~:text=Carbon%20offsetting%20and%20removals,schemes%20for%20residual%20emissions%20only.

European Commission. (n.d.). **Carbon border adjustment mechanism.** Retrieved from https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism_en

European Commission. (n.d.). **Corporate sustainability reporting.** Retrieved from https://finance.ec.europa.eu/capital-markets-union-and-financial-markets/company-reporting-and-auditing/company-reporting/corporate-sustainability-reporting_en#legislation

European Parliament. (2020, December 8). **The impact of textile production and waste on the environment.** Retrieved from https://www.europarl.europa.eu/topics/en/article/20201208STO93327/the-impact-of-textile-production-and-waste-on-the-environment-infographics#:~:text=The%20fashion%20industry%20is%20estimated,of%20CO2%20emissions%20per%20person.

European Commission. (2024, March 27). **New EU rules empower consumers green transition.** Retrieved from https://energy.ec.europa.eu/news/new-eu-rules-empower-consumers-green-transition-enter-force-2024-03-27_en

European Commission. (2024). **Textiles strategy.** Retrieved from https://environment.ec.europa.eu/strategy/textiles-strategy_en

Fashion Dive. (n.d.). **Fashion industry fossil fuels carbon emissions mapping.** Retrieved from https://www.fashiondive.com/news/fashion-industry-fossil-fuels-carbon-emissions-mapping/645992/

Fashion for Good. (2021). **Unlocking the trillion-dollar fashion decarbonisation opportunity.** Retrieved from https://reports.fashionforgood.com/wp-content/uploads/2021/11/REPORT-Unlocking-The-Trillion-Dollar-Fashion-Decarbonisation-Opportunity-Fashion-for-Good-Aii.pdf

FashionUnited. (2023, June 15). **Retailers must have better engagement with their supply chains to claim green credentials.** Retrieved from https://fashionunited.uk/news/fashion/retailers-must-have-better-engagement-with-their-supply-chains-to-claim-green-credentials/2023061570037

FashionUnited. (2024, March 29). **Boardriders to lay off 590 employees in latest round of job cuts.** Retrieved from https://fashionunited.uk/news/business/boardriders-to-lay-off-590-employees-in-latest-round-of-job-cuts/2024032974874

Fibre2Fashion. (n.d.). **Navigating the impact of CBAM: Insights for textile and garment exporters**. Retrieved from https://www.fibre2fashion.com/industry-article/9745/navigating-the-impact-of-cbam-insights-for-textile-and-garment-exporters

Fibre2Fashion. (n.d.). **The textile industry's transition to renewable energy.** Retrieved from https://www.fibre2fashion.com/industry-article/9496/the-textile-industry-s-transition-to-renewable-energy

Forum for the Future. (2024). Global press release: Cotton 2040 planning for climate adaptation. Retrieved from https://www.forumforthefuture.org/global-press-release-cotton-2040-planning-for-climate-adaptation

Forbes. (2024, May 13). **Canada launches greenwashing investigation into Lululemon.** Retrieved from https://www.forbes.com/sites/jonmcgowan/2024/05/13/canada-launches-greenwashing-investigation-into-lululemon/

France24. (2024, February 26). **2 million animals dead as extreme winter weather hits Mongolia.** Retrieved from https://www.france24.com/en/live-news/20240226-2-million-animals-dead-as-extreme-winter-weather-hits-mongolia

Future Supplier Initiative. (2024). Retrieved from https://futuresupplierinitiative.com/

G-Star. (n.d.). **Energy consumption breakdown – carbon footprint 2022.** Retrieved from https://img2.g-star.com/image/upload/v1715757957/CSR/24-1/Energy_Consumption_Breakdown_-_Carbon_Footprint_2022.pdf

G-Star RAW. (2022). **Sustainability Report 2022.** Retrieved from https://img2.g-star.com/image/upload/v01/raw-responsibility/downloads/strategy-reporting/G-Star_RAW_Sustainability_Report_2022.pdf

Geographical. (n.d.). **Cashmere crisis.** Retrieved from https://geographical.co.uk/culture/cashmere-crisis

GHG Protocol. (n.d.). Corporate standard. Retrieved from https://ghgprotocol.org/corporate-standard

GHG Protocol. (n.d.). **GHG protocol gold standard for accounting greenhouse gas emissions.** Retrieved from https://ghgprotocol.org/blog/ghg-protocol-gold-standard-accounting-greenhouse-gas-emissions

Gildan. (2022). **ESG Report.** Retrieved from https://gildancorp.com/media/uploads/sustainability_reports/b2022_gildan_esg_report_OTiA3Xk.pdf

Global Witness. (2023, September). **Who were the 11 Philippines environmental defenders killed in 2022?** Retrieved from https://news.mongabay.com/2023/09/who-were-the-11-philippines-environmental-defenders-killed-in-2022/#:~:text=The%20Philippines%20has%20gained%20the,to%20the%20nonprofit%20Global%20Witness.

Global Witness. (n.d.). **Standing firm.** Retrieved from https://www.globalwitness.org/en/campaigns/environmental-activists/standing-firm/#:~:text=Last%20year%2C%20at%20least%20177,2015%20and%2031%20December%202022.

Global Witness. (n.d.). **Transition minerals: Climate solution could cost Earth.** Retrieved from https://www.globalwitness.org/en/blog/transition-minerals-climate-solution-could-cost-earth/

Government of the United Kingdom. (2024). **ASOS, Boohoo and Asda greenwashing investigation.** Retrieved from https://www.gov.uk/cma-cases/asos-boohoo-and-asda-greenwashing-investigation#full-publication-update-history

Government of the United Kingdom. (2024). **Environmental principles policy statement.** Retrieved from https://www.gov.uk/government/publications/environmental-principles-policy-statement/environmental-principles-policy-statement#fnref:9

Greenpeace. (2024). **Fashion greenwash report: Companies hiding true environmental costs of fast fashion.** Retrieved from https://www.greenpeace.org.uk/news/fashion-greenwash-report-companies-hiding-true-environmental-costs-fast-fashion/

Guardian. (2024, April 11). **Climate target organisation faces staff revolt over carbon offsetting plan: SBTi.** Retrieved from https://www.theguardian.com/environment/2024/apr/11/climate-target-organisation-faces-staff-revolt-over-carbon-offsetting-plan-sbti

Guardian. (2024, January 17). **EU bans misleading environmental claims that rely on offsetting.** Retrieved from https://www.theguardian.com/environment/2024/jan/17/eu-bans-misleading-environmental-claims-that-rely-on-offsetting#:~:text=Terms%20such%20as%20%E2%80%9Cclimate%20neutral,crackdown%20on%20misleading%20environmental%20claims

Guardian. (2024, January 18). **It's the industry's dirty secret: Why fashion's oversupply problem is an environmental disaster.** Retrieved from https://www.theguardian.com/fashion/2024/jan/18/its-the-industrys-dirty-secret-why-fashions-oversupply-problem-is-an-environmental-disaster#:~:text=on%20to%20consumers.-,Brands%20are%20manufacturing%20demand%20in%20the%20same%20way%20they%20manufacture,cycle%20of%20discounts%20and%20promotions

Guardian. (2024, July 1). **Surely we are smarter than mowing down 1,000-year-old trees to make T-shirts: The complex rise of viscose.** Retrieved from https://www.theguardian.com/fashion/article/2024/jul/01/surely-we-are-smarter-than-mowing-down-1000-year-old-trees-to-make-t-shirts-the-complex-rise-of-viscose

Guardian. (2024, January 17). **EU bans misleading environmental claims that rely on offsetting.** Retrieved from https://www.theguardian.com/environment/2024/jan/17/eu-bans-misleading-environmental-claims-that-rely-on-offsetting#:~:text=Terms%20such%20as%20%E2%80%9Cclimate%20neutral,crackdown%20on%20misleading%20environmental%20claims

Guardian. (2024, January 18). **It's the industry's dirty secret: Why fashion's oversupply problem is an environmental disaster.** Retrieved from https://www.theguardian.com/fashion/2024/jan/18/its-the-industrys-dirty-secret-why-fashions-oversupply-problem-is-an-environmental-disaster#:~:text=on%20to%20consumers.-,Brands%20are%20manufacturing%20demand%20in%20the%20same%20way%20they%20manufacture,cycle%20of%20discounts%20and%20promotions.

H&M Group. (2024, March). **Climate transition plan.** Retrieved from https://hmgroup.com/wp-content/uploads/2024/03/Climate-Transition-Plan.pdf

HBIS Group. (n.d.). **Climate.** Retrieved from https://hbisustains.com/climate/

H&M Group. (2023, March). **Sustainability Disclosure 2023.** Retrieved from https://hmgroup.com/wp-content/uploads/2024/03/HM-Group-Sustainability-Disclosure-2023.pdf

Hugo Boss. (2023). **Sustainability Report 2023.** Retrieved from https://sustainabilityreport-2023.hugoboss.com/_assets/downloads/HUGO-BOSS-Sustainability-Report-2023.pdf

Hugo Boss. (2024). **Climate Protection.** Retrieved from https://group.hugoboss.com/en/sustainability/planet/climate-protection

IBM. (n.d.). **Carbon accounting.** Retrieved from https://www.ibm.com/topics/carbon-accounting

IEA. (2024). Retrieved from https://www.iea.org/

ILO. (2024). Retrieved from https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_emp/@emp_ent/documents/publication/wcms_432859.pdf

ILO. (n.d.). Retrieved from https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C098

International Energy Agency. (2019). **Global energy & CO2 status report 2019: Emissions.** Retrieved from https://www.iea.org/reports/global-energy-co2-status-report-2019/emissions

International Energy Agency. (n.d.). **Asia-Pacific.** Retrieved from https://www.iea.org/regions/asia-pacific

International Labour Organization. (2024). Retrieved from https://www.ilo.org/media/407986/download

IndustrIALL Union. (2024). **SEWA India provides members with heat wave insurance.** Retrieved from https://www.industriall-union.org/sewa-india-provides-members-with-heat-wave-insurance

International Energy Agency. (2024). **Bangladesh: Renewables.** Retrieved from https://www.iea.org/countries/bangladesh/renewables

International Labour Organization. (2024). **Climate breakdown.** Retrieved from https://www.ilr.cornell.edu/global-labor-institute/higher-ground-fashions-climate-breakdown

International Labour Organization. (2024). **Policy brief updated.** Retrieved from https://www.antislavery.org/wp-content/uploads/2024/01/ASI-HCIJ-IAHR-Policy-Brief-updated.pdf

International Labour Organization. (2024). **Renewable electricity report.** Retrieved from https://newclimate.org/sites/default/files/2024-01/NewClimate_RenewableElectricityReport_%20Jan24.pdf

International Labour Organization. (2024). Retrieved from https://www.ilo.org/

International Labour Organization. (2024). **Roadmap to net zero: Delivering science-based targets in the apparel sector.** Retrieved from https://www.wri.org/research/roadmap-net-zero-delivering-science-based-targets-apparel-sector

International Labour Organization. (2024). **Working papers.** Retrieved from https://webapps.ilo.org/static/english/intserv/working-papers/wp031/index.html#ID0EEAAC

International Labour Organization. (2024). **Worldwide production volumes.** Retrieved from https://report.adidas-group.com/2023/en/group-management-report-our-company/global-operations.html?search-highlight=Worldwide%20production%20volumes%20products%2C%20product%20volume%20production%2C%20Production%20products

International Trade Union Confederation. (2024). **Global rights index.** Retrieved from https://www.ituc-csi.org/ituc-global-rights-index-2024

IOP Science. (2017). **Climate impacts of woody biomass for power and heat.** Retrieved from https://iopscience.iop.org/article/10.1088/1748-9326/aaa512/meta

IPCC. (2024). **IPCC AR6 WGIII Press Release.** Retrieved from https://www.ipcc.ch/2022/04/04/ipcc-ar6-wgiii-pressrelease/

Jason Hickel. (2024). **Less is more.** Retrieved from https://www.jasonhickel.org/less-is-more

Kontoor Brands. (2024). **Sustainability report 2021-2022**. Retrieved from https://d1io3yog0oux5.cloudfront.net/_7961158c8774a6d24e92fd32e4467671/kontoorbrands/files/pages/kontoorbrands/db/802/description/Sustainability_Report_2021-2022.pdf

Laudes Foundation. (2024). Retrieved from https://www.laudesfoundation.org/?locale=en

LightCastle Partners. (2024, February). **Renewable energy in the apparel industry.** Retrieved from https://www.lightcastlebd.com/insights/2024/02/renewable-energy-in-apparel-industry/

Loblaw Companies Limited. (2023). **ESG report.** Retrieved from https://dis-prod.assetful.loblaw.ca/content/dam/loblaw-companies-limited/creative-assets/loblaw-ca/responsibility-/ESG%20Report_ENGLISH_final%20AODA.pdf

LSE Blogs. (2023, March 6). **Heatwaves for the poor: How can Bangladesh deal with it?** Retrieved from https://blogs.lse.ac.uk/southasia/2023/03/06/heatwaves-for-the-poor-how-can-bangladesh-deal-with-it/#:~:text=A%20study%20published%20by%20the,heat%20stress%20from%20extreme%20temperatures

Lululemon. (2022). **Impact report.** Retrieved from https://corporate.lululemon.com/%7E/media/Files/L/Lululemon/our-impact/reporting-and-disclosure/lululemon-2022-impact-report.pdf

Lululemon. (2022). **Impact report.** Retrieved from https://corporate.lululemon.com/~/media/Files/L/Lululemon/our-impact/reporting-and-disclosure/lululemon-2022-impact-report.pdf

Made51. (2024). Retrieved from https://made51.org/

Made51. (2024). **Roots.** Retrieved from https://shop.made51.org/collections/roots

McKinsey & Company. (2024). **Fashion on climate.** Retrieved from https://www.mckinsey.com/%7E/media/mckinsey/industries/retail/our%20insights/fashion%20

McKinsey & Company. (2024). **Sustainable style: How fashion can afford and accelerate decarbonization.** Retrieved from https://www.mckinsey.com/industries/retail/our-insights/sustainable-style-how-fashion-can-afford-and-accelerate-decarbonization

McKinsey & Company. (n.d.). **Fashion on climate.** Retrieved from https://www.mckinsey.com/%7E/media/mckinsey/industries/retail/our%20insights/fashion%20on%20climate/fashion-on-climate-full-report.pdf

MDPI. (2021). Retrieved from https://www.mdpi.com/2071-1050/13/14/7694

Mongabay. (2023, June). **Report: Forest-razing biomass plant in Indonesia got millions in green funds.** Retrieved from https://news.mongabay.com/2023/06/report-forest-razing-biomass-plant-in-indonesia-got-millions-in-green-funds/

MSI Integrity. (2024). **Not fit for purpose.** Retrieved from https://www.msi-integrity.org/not-fit-for-purpose/

Nature. (2023). **Climate change: Set to breach limit for first time by 2027.** Retrieved from https://www.nhm.ac.uk/discover/news/2023/may/climate-change-set-breach-limit-for-first-time-by-2027.html

Nature. (2023). **Indian workers suffer heat waves that turn factories into furnaces.** Retrieved from https://www.preventionweb.net/news/indian-workers-suffer-heat-waves-turn-factories-furnaces

Nature. (2024). **Climate impacts on agriculture: A comprehensive study on cotton, rice, and sugarcane.** Retrieved from https://www.nature.com/articles/s41598-023-30347-y#:~:text=Thus%20approximately%2057%25%20(2.8%20million,cotton%2C%20rice%2C%20and%20sugarcane.

Nature. (2024). **Time is running out to close fashion's ambition-action gap, report says.** Retrieved from https://www.voguebusiness.com/sustainability/time-is-running-out-to-close-fashions-ambition-action-gap-report-says

New York Times. (2019, April 22). **Earth Day and climate.** Retrieved from https://www.nytimes.com/2019/04/22/opinion/earth-day-climate.html

Nike. (2024, July). **Nike slashed its sustainability workforce after a pledge to reduce its carbon footprint.** Retrieved from https://www.oregonlive.com/business/2024/07/nike-slashed-its-sustainability-workforce-after-a-pledge-to-reduce-its-carbon-footprint.html

Open Supply Hub. (2023, February). **Press release.** Retrieved from https://info.opensupplyhub.org/press/sourcing-journal-feb-23

Open Supply Hub. (2024). Retrieved from https://opensupplyhub.org/

OVS. (2024). **Consolidated non-financial statement.** Retrieved from https://wecare.ovscorporate.it/pdf/bilancio-sostenibilita/2023_OVS_consolidated_non-financial_statement.pdf

PCIAW. (2024). **Flooding in Pakistan: What repercussions for the textile industry?** Retrieved from https://pciaw.org/flooding-in-pakistan-what-repercussions-for-the-textile-industry/

Phnom Penh Post. (2023). **Floods close 40 factories.** Retrieved from https://www.phnompenhpost.com/national/floods-close-40-factories

Planet Tracker. (2023, April). **Textiles remuneration report.** Retrieved from https://planet-tracker.org/wp-content/uploads/2023/04/Textiles-remuneration-report.pdf

Primark. (n.d.). **Sustainable cotton programme.** Retrieved from https://corporate.primark.com/en-gb/a/primark-cares/product/sustainable-cotton-programme

Primark. (2023). **Sustainability and ethics progress report 2022-23.** Retrieved from https://primark.a.bigcontent.io/v1/static/primark-sustainability-and-ethics-progress-report-2022-23

PV Magazine. (2020, June 3). **Solar costs have fallen 82% since 2010.** Retrieved from https://www.pv-magazine.com/2020/06/03/solar-costs-have-fallen-82-since-2010/

PVH. (2022). **Corporate responsibility report 2022.** Retrieved from https://www.pvh.com/-/media/Files/pvh/responsibility/PVH-CR-Report-2022.pdf

RE100. (2022, December 12). **Technical criteria and appendices.** Retrieved from https://www.there100.org/sites/re100/files/2022-12/Dec%2012%20-%20RE100%20technical%20criteria%20%2B%20appendices.pdf

Roots of South Sudan. (n.d.). Retrieved from https://www.rootsofsouthsudan.org/

Reuters. (2024). **The Times: Former owner of In The Style set to wind up.** Retrieved from https://www.thetimes.com/uk/article/in-the-styles-former-owner-set-to-wind-up-ztk3n5l3l

SEWA. (n.d.). Retrieved from https://www.sewa.org/

Science Based Targets. (2024). **Companies taking action.** Retrieved from https://sciencebasedtargets.org/companies-taking-action

Science Based Targets. (2024). Retrieved from https://sciencebasedtargets.org/

Science Based Targets. (2024). **SBTi Business Ambition final report.** Retrieved from https://sciencebasedtargets.org/resources/files/SBTi-Business-Ambition-final-report.pdf

Sky News. (2024). **World has lost battle to stop glaciers melting and sea level rising, UN meteorological chief says.** Retrieved from https://news.sky.com/story/world-has-lost-battle-to-stop-glaciers-melting-and-sea-level-rising-un-meteorological-chief-says-12898899

Solaric Global. (n.d.). **Barriers and limitations of renewable energy in Bangladesh.** Retrieved from https://solaricglobal.com/blog/barriers-and-limitations-of-renewable-energy-in-bangladesh

Sourcing Journal. (2023). **Rio Grande do Sul flooding impacts Brazil's footwear and leather industries.** Retrieved from https://sourcingjournal.com/topics/business-news/rio-grande-do-sul-flooding-brazil-footwear-leather-impacts-510693/

Sourcing Journal. (2024). **Denim brands: Ozak Textile denim factory in Turkey, Levi's freedom of association.** Retrieved from https://sourcingjournal.com/denim/denim-brands/ozak-textile-denim-factory-turkey-levis-freedom-of-association-wrc-515413/

Sourcing Journal. (2024). **Pakistan floods monsoon cotton crops: Soorty climate change, GAP, Zara.** Retrieved from https://sourcingjournal.com/topics/raw-materials/pakistan-floods-monsoon-cotton-crops-soorty-climate-change-gap-zara-368082/

Speak Louder. (2024). **Industry associations: Advancing climate goals or protecting corporate interests?** Retrieved from https://speakslouder.org/blog/industry-associations-advancing-climate-goals-or-protecting-corporate-interests/

Speak Louder. (n.d.). Retrieved from https://speakslouder.org/

Speak Louder. (2024). **Be Planet: Toxic pollution and fossil fuel reliance in Lululemon's supply chain.** Retrieved from https://speakslouder.org/report/be-planet-toxic-pollution-and-fossil-fuel-reliance-in-lululemons-supply-chain/

Springer. (2022). Retrieved from https://link.springer.com/article/10.1007/s12053-022-10071-8

Springer. (2024). **Carbon emissions and energy efficiency in fashion.** Retrieved from https://link.springer.com/article/10.1007/s12053-022-10071-8

Squarespace. (n.d.). **Fabric white paper.** Retrieved from https://static1.squarespace.com/static/5efdeb17898fb81c1491fb04/t/65e732540b9f0163f3fbc2d5/1709650517808/240229_Fabric_WhitePaper_A4.pdf

Stand.earth. (2024). **Nowhere to hide: How the fashion industry is linked to Amazon rainforest destruction.** Retrieved from https://stand.earth/resources/nowhere-to-hide-how-the-fashion-industry-is-linked-to-amazon-rainforest-destruction/?ea_tracking_id=facebook-social-social

Stockholm Resilience Centre. (2018, August 6). **Planet at risk of heading towards hothouse Earth state.** Retrieved from https://www.stockholmresilience.org/research/research-news/2018-08-06-planet-at-risk-of-heading-towards-hothouse-earth-state.html

Stockholm Resilience Centre. (2023, September 13). **All planetary boundaries mapped out for the first time: Six of nine crossed.** Retrieved from https://www.stockholmresilience.org/research/research-news/2023-09-13-all-planetary-boundaries-mapped-out-for-the-first-time-six-of-nine-crossed.html

Stop Waste Colonialism. (2024). **Speak volumes.** Retrieved from https://stopwastecolonialism.org/speak-volumes/

Stop Waste Colonialism. (2024). **Stop waste colonialism.** Retrieved from https://stopwastecolonialism.org/stopwastecolonialism.pdf

SupplyTrace. (n.d.). Retrieved from https://info.supplytrace.org/

Sustainable Fibre Alliance. (2024). **Dzud hits Mongolia: Devastating conditions for livestock herders.** Retrieved from https://sustainablefibre.org/dzud-hits-mongolia-devastating-conditions-for-livestock-herders/

Switch Asia. (n.d.). **The true cost of cashmere.** Retrieved from https://www.switch-asia.eu/news/the-true-cost-of-cashmere/

TextilePact. (2024). Retrieved from https://www.textilepact.net/

The Guardian. (2022, April 9). **Why eco-conscious fashion brands can continue to increase emissions.** Retrieved from https://www.theguardian.com/environment/2022/apr/09/why-eco-conscious-fashion-brands-can-continue-to-increase-emissions?CMP=Share_iOSApp_Other

The Wire. (2023). **Cotton farmers in India and Pakistan bear the brunt of extreme heat, unpredictable rainfall.** Retrieved from https://thewire.in/environment/cotton-farmers-in-india-and-pakistan-bear-the-brunt-of-extreme-heat-unpredictable-rainfall

The World Bank. (2024). Retrieved from https://pubs.acs.org/doi/10.1021/acs.est.6b03731

Third Light. (n.d.). **Circular business models.** Retrieved from https://emf.thirdlight.com/file/24/0m5sTEKOmm-fEeVOm7xNOmq6S2k/Circular%20business%20models.pdf

Times of India. (2023, July 24). **H&M Group testing disruptive tech to reduce eco-impact of dyeing process.** Retrieved from https://www.just-style.com/news/hm-group-testing-disruptive-tech-to-reduce-eco-impact-of-dyeing-process/

Transformers Foundation. (2024). **Annual report 2023.** Retrieved from https://www.transformersfoundation.org/annual-report-2023

Transformers Foundation. (n.d.). Retrieved from https://www.transformersfoundation.org/

Transformers Foundation. (2024). **Towards a collective approach.** Retrieved from https://static1.squarespace.com/static/5efdeb17898fb81c1491fb04/t/659ca75536446a3f34a7d108/1704765271297/TF_TowardsACollectiveApproach_20240108.pdf

Trend Asia. (n.d.). **Indonesian and international CSOs call on the fashion industry to rule out biomass to ensure a clean energy transition away from fossil fuels and false solutions.** Retrieved from https://trendasia.org/en/indonesian-and-international-csos-call-on-the-fashion-industry-to-rule-out-biomass-in-order-to-ensure-a-clean-energy-transition-away-from-fossil-fuels-and-false-solutions

Trend Asia. (2024). **Indonesian and international CSOs call on the fashion industry to rule out biomass in order to ensure a clean energy transition away from fossil fuels and false solutions.** Retrieved from https://trendasia.org/en/indonesian-and-international-csos-call-on-the-fashion-industry-to-rule-out-biomass-in-order-to-ensure-a-clean-energy-transition-away-from-fossil-fuels-and-false-solutions/

UK News Yahoo. (2024). **Scary NASA visualisation shows 30 years of sea level rises.** Retrieved from https://uk.news.yahoo.com/scary-nasa-visualisation-shows-30-years-of-sea-level-rises-123803296.html

UN. (n.d.). **Net zero coalition.** Retrieved from https://www.un.org/en/climatechange/net-zero-coalition#:~:text=to%202010%20levels.-,To%20keep%20global%20warming%20to%20no%20more%20than%201.5%C2%B0,reach%20net%20zero%20by%202050

UNEP. (2019). **Emissions gap report 2019.** Retrieved from https://wedocs.unep.org/bitstream/handle/20.500.11822/30797/EGR2019.pdf?sequence=1&isAllowed=y

UNFCCC. (2021). **Fashion Industry Charter for Climate Action.** Retrieved from https://unfccc.int/sites/default/files/resource/Fashion%20Industry%20Carter%20for%20Climate%20Action_2021.pdf

UNFCCC. (2024). **UN helps fashion industry shift to low carbon.** Retrieved from https://unfccc.int/news/un-helps-fashion-industry-shift-to-low-carbon#:~:text=The%20fashion%20industry%2C%20including%20the,aviation%20and%20shipping%20industry%20combined.

United Nations. (2024). **Net Zero Coalition.** Retrieved from https://www.un.org/en/climatechange/net-zero-coalition#:~:text=to%202010%20levels.-,To%20keep%20global%20warming%20to%20no%20more%20than%201.5%C2%B0,reach%20net%20zero%20by%202050.

United Nations. (2024). **Freedom of association report.** Retrieved from https://media.business-humanrights.org/media/documents/2024_FoA_report.pdf

UNFCCC. (2020). **UN fashion industry charter for climate action.** Retrieved from https://unfccc.int/sites/default/files/resource/20_REP_UN%20FIC%20Playbook_V7.pdf

UNFCCC. (n.d.). **UN helps fashion industry shift to low carbon.** Retrieved from https://unfccc.int/news/un-helps-fashion-industry-shift-to-low-carbon#:~:text=The%20fashion%20industry%2C%20including%20the,aviation%20and%20shipping%20industry%20combined

UNICEF. (2024, February 21). **Mongolia humanitarian situation report: Dzud.** Retrieved from https://www.unicef.org/media/153056/file/Mongolia-Humanitarian-SitRep-Dzud-21-February-2024.pdf

VF Corporation. (2023). **Sustainability report.** Retrieved from https://s203.q4cdn.com/764564379/files/doc_sustainability/FY23-Sustainability-Report.pdf

Vietnamese WTO Center. (n.d.). **Seizing investment opportunities in Vietnam's garment and textile industry.** Retrieved from https://wtocenter.vn/chuyen-de/17054-seizing-investment-opportunities-in-vietnams-garment-and-textile-industry

Vietnam Garment Hub. (2024). Retrieved from https://asiagarmenthub.net/agh-countries/vietnam

Vogue Business. (2024). **In the aftermath of earthquakes, Türkiye's textile industry calls on brands for support.** Retrieved from https://www.voguebusiness.com/sustainability/in-the-aftermath-of-earthquakes-turkiyes-textile-industry-calls-on-brands-for-support

Vogue Business. (2024). **Ted Baker cuts 200 jobs following outsourcing deals.** Retrieved from https://www.drapersonline.com/news/ted-baker-cuts-200-jobs-following-outsourcing-deals

War on Want. (2023, August). **Fashioning the future: Putting workers at the heart of a just transition.** Retrieved from https://waronwant.org/sites/default/files/2023-08/WOW_Fashioning%20the%20Future_report.pdf

Waronwant. (2024). **Fashion is not an island: Workers at the heart of a just transition.** Retrieved from https://waronwant.org/fashioning-future/fashion-not-island-workers-heart-just-transition

We Mean Business Coalition. (n.d.). **Just transition resource platform.** Retrieved from https://www.wemeanbusinesscoalition.org/just-transition-resource-platform/

Wikirate. (n.d.). Retrieved from https://wikirate.org/

World Resources Institute. (2024). **Roadmap to net zero: Delivering science-based targets in the apparel sector.** Retrieved from https://www.wri.org/research/roadmap-net-zero-delivering-science-based-targets-apparel-sector

World Bank. (2024). **Just transition 2.** Retrieved from https://www.blfbd.com/just-transition-2/

World Benchmarking Alliance. (2021, February). **Just transition approach report.** Retrieved from https://assets.worldbenchmarkingalliance.org/app/uploads/2021/02/Just-transition-Approach-Report-February-2021.pdf

World Meteorological Organization. (n.d.). **Record temperature streak continues.** Retrieved from https://wmo.int/media/news/record-temperature-streak-continues-june

World Wildlife Fund. (2018). **Guideline for cleaner production in the textile industry.** Retrieved from https://d2hawiim0tjbd8.cloudfront.net/downloads/wwf_guideline_cleaner_production_textile_2018.pdf

Wrap. (2024). **Nation's wardrobes hold 16 billion items of unworn clothes as people open new wardrobes.** Retrieved from https://wrap.org.uk/media-centre/press-releases/nations-wardrobes-hold-16-billion-items-unworn-clothes-people-open-new

WRI. (n.d.). **Roadmap to net zero emissions in the apparel sector.** Retrieved from https://www.wri.org/technical-perspectives/roadmap-net-zero-emissions-apparel-sector

WWD. (2023). **Highest paid fashion CEOs.** Retrieved from https://wwd.com/lists/highest-paid-fashion-ceos-1236450589/

WWF. (2024). **First things first: Avoid, reduce, and only after that, compensate.** Retrieved from https://wwf.panda.org/wwf_news/?362819/First-Things-First-Avoid-Reduce--and-only-after-thatCompensate

Xinhua News. (2024, February 27). **Mongolia's extreme winter weather affects livestock.** Retrieved from https://english.news.cn/20240227/68e4f8deec5848a6b6c22fb1b975d578/c.html

DISCLAIMER

What Fuels Fashion? is made available on the express request that it will be used only for general information purposes. Readers are encouraged to form their own views and opinions on each of the brands mentioned in this Report. All content in **What Fuels Fashion?** is not to be construed as connected to or relating to any form of legal, governance, regulatory, research or investment advice nor any other specific or general advice on buying, selling or dealing in any way with the brands mentioned in this Report. This Report has not been prepared to any specific or general investment objectives. Before acting on anything inspired by anything contained in this Report, you must consider whether it is suitable to your circumstances and, if necessary, seek professional advice. No representation or warranty is given that the material in this Index is accurate, complete or up-to-date.

The material in this Index is based on information that we have found in the public domain and reasonably considered correct at the time of publication. Fashion Revolution has not verified, validated or audited the data used to prepare this Index.

The assessment of fashion brands has been carried out solely according to the new Fashion Transparency Index methodology and no other assessment models used by any of the project partners or our analyst team. Any statements, opinions, conclusions or recommendations contained in this Index are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions based on detailed research as of the date of the publication of this Index only and may change without notice. Any views expressed in this Index only represent the views of Fashion Revolution CIC, unless otherwise expressly noted. The content of this publication can in no way be taken to reflect the views of any of the funders of Fashion Revolution CIC or **What Fuels Fashion?**.

While the material contained in this Index has been prepared in good faith, neither Fashion Revolution CIC nor any of its partners, agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representations or warranties (either express or implied) as to the accuracy, completeness, reliability, or truth, of the information contained in this Index or any other information made available in connection with this Index, and disclaims all liability for loss of any kind suffered by any party as a result of the use of this Fashion Transparency Index. Neither Fashion Revolution CIC nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of this Index with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent.

Reference herein to any specific brand, commercial product, process, or service by trade name, trademark, manufacturer, or otherwise, does not constitute or imply its endorsement, recommendation, favouring, boycotting, abusing, defaming by Fashion Revolution CIC nor any of its agents, representatives, advisers, affiliates, directors, officers and employees.

To the maximum extent permitted by law any responsibility or liability for this Index or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings in connection with or arising in relation to this Index will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

ATTRIBUTION

This work is owned by Fashion Revolution CIC (Company number: 8988812) and has been written by Maeve Galvin, Liv Simpliciano, Ciara Barry, Delphine Williot, Ysabl Marie Dobles and Isabella Luglio on the Policy & Research team at Fashion Revolution CIC.

The research is led by Fashion Revolution's Policy and Research Manager, Liv Simpliciano and others from the Policy & Research team at Fashion Revolution CIC, including Ciara Barry, Delphine Williot, Ysabl Marie Dobles and Isabella Luglio – with support from Fashion Revolution's Policy Director, Maeve Galvin. It has been designed by Molly Porteous.

The Laudes Foundation, the Pooled Fund for International Energy (PIE) and Tara Climate Foundation funded Fashion Revolution CIC to carry out the research for this Index. Laudes Foundation is an independent foundation and part of the Brenninkmeijer family enterprise, alongside COFRA Group businesses, and the family's other private philanthropic activities, including Porticus, Good Energies Foundation and Argidius Foundation. The Foundation is independent from the Group and works to influence all of the garment industry, including the COFRA group businesses which includes C&A.

We would like to highlight our fair treatment of fact and our unbiased approach to assessing C&A in the report. We have mitigated any risk of a conflict of interest by the following three methods: viewing and treating C&A and the Laudes Foundation as separate entities; treating C&A like any other of the 250 brands we analysed and not giving C&A any preferential treatment in this or additional assessments of C&A by our technical partner in Brasil ABC Associados.

LICENCES – CREATIVE COMMONS

Published August 2024

DONATE

Change takes time, persistence, and lots of effort and resources to achieve. Your support will help us continue to research, raise awareness, activate and amplify to hold the largest power brokers in the fashion industry to account for their role in the climate and equality crisis.

It will also help us to continue the important ongoing work of lobbying policymakers to take action and helping to create game-changing legislation for fashion and textiles.

Fashion Revolution has a global network of close to 75 countries. Your donation will also help us to expand our diverse and informed movement, mobilising communities and bringing people and organisations together around the world to take collective action to address the systemic challenges facing the global fashion industry.

Please consider making a regular donation to Fashion Revolution, or a one-off donation, to help us continue our critical work.

Thank you so much for your support!

To donate, click here

WELCOMING YOUR FEEDBACK

We recognise that this research is not perfect and can always be improved. We welcome any feedback or questions on the report to transparency@fashionrevolution.org.

www.fashionrevolution.org
@fash_rev
fash_rev
facebook.com/fashionrevolution.org