



DISCUSSION PAPER

ON (THE LACK OF) TRANSPARENCY

IN THE PARTNERSHIP FOR SUSTAINABLE TEXTILES

June 2021

FASHION
CHECKER 

Clean
Clothes
Campaign 

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This publication was produced with the financial support of the European Union. Its contents are the sole responsibility of Clean Clothes Campaign and do not necessarily reflect the views of the European Union.

Introduction

This paper looks at how transparency is handled within the German Partnership for Sustainable Textiles (PST) - regarding both supply chain transparency and transparency on the due diligence processes of its members, i.e. the PST's so-called Review Process. The German Clean Clothes Campaign (CCC) is a member of the PST and has always worked towards improving the Partnership's approach to supply chain and reporting transparency. However, as this analysis shows, there has been almost no progress at all in terms of supply chain transparency. A new reporting system for PST members is set to be implemented in 2021. This new system will be crucial to evaluate whether this is a step forward in companies' human rights due diligence and progress towards greater transparency. This paper wants to contribute to an improved Review Process and supply chain transparency by providing recommendations for the way forward.

The textile, garment and footwear industry is characterised by a lack of transparency, facilitated by **complex global value chains**, where goods sold worldwide are predominantly produced in factories across Asia, Southern and Eastern Europe, Africa and Latin America. In general, these factories work under extreme time pressures to deliver orders, and multi-layered supply chains mean that the manufacturing market is opaque. The **confidentiality** of contractual obligations makes it challenging to identify which factories produce for which brands, and whether a specific supplier is respecting workers' rights and providing safe working conditions: the only way to know this information is to rely on what brands say. Effectively, **what happens in the factory, stays in the factory.**

Over the past few years, transparency has become increasingly fashionable, however many companies continue to keep large parts of their business practices in the dark. The lack of clear information creates the following negative consequences:

- It prevents public scrutiny of companies' behaviour as well as an understanding among a broader public of the real impact of that specific company's chain of operations and, therefore, the consequences of their purchases.
- It does not allow the company concerned to effectively understand the impact of its business operations and to reassess its practices after a proper risk evaluation.
- It prevents workers from identifying the buyers of the products they make, thus weakening their possibility for complaints and remedies as they often do not know the company they are producing for.

Transparency enables workers, labour organisations, human rights groups, and others to swiftly alert apparel companies to labour abuses in the factories producing for them, giving companies an opportunity to intervene, stop and rectify rights violations

at an early stage. It allows workers to further their fight for justice by providing access to information on which brands and retailers, multi-stakeholder initiatives or judicial courts they can approach for remedy. Transparency facilitates brand collaboration and collective action to stop, prevent, mitigate, and provide remedy for labour abuses in supply chains.

In recent years, there has been an encouraging increase in **supply chain transparency**, i.e. in how transparent fashion brands are about where and how their clothes are produced. More and more brands are disclosing production locations and signing the [Transparency Pledge](#) (see text box).

The Transparency Pledge

Lacking an industry-wide standard for transparency means that companies adopt differing approaches, creating a lack of consistency and confusion for consumers. To tackle this, in 2016, the Clean Clothes Campaign, together with eight other labour and human rights organisations, formed a coalition to advocate for a minimum transparency standard in the apparel supply chains. This coalition endorsed a Transparency Pledge as a minimum standard for supply chain disclosure, demanding all apparel companies sign up to this Pledge, which aims at consistency in disclosure practices. By signing the Transparency Pledge, companies commit to bi-annually publish on their website: (i) the full name of all authorised production units and processing facilities; (ii) the production site addresses; (iii) the parent company of the business at the site; (iv) the type of products made (apparel, footwear, home textile, accessories); (v) the number of workers at each site by category: less than 1.000, 1.001 to 5.000, 5.001 to 10.000, more than 10.000 workers. Companies shall publish the above information in a spreadsheet or other searchable format, to allow stakeholders to effectively make use of the data.

However, there are still too many brands that refuse to do so, and even the most progressive brands still do not show their entire supply chain let alone transparently report on what they do to prevent and address human rights violations within these supply chain. And this although international standards such as the **UN Guiding Principles on Business and Human Rights** (UNGP) state that companies must account for how they address human rights, providing adequate and transparent information.

The UNGP explain that *“formal reporting is expected by enterprises where risks of severe human rights impacts exist, whether this is due to the nature of the business operations or operating contexts”*, such as the garment industry model. **Chapter IV of the OECD Guidelines for Multinational Enterprises** mandates companies to *“carry out human rights due diligence as appropriate to their size, the nature and context of*

operations and the severity of the risks of adverse human rights impacts.” The sector-specific [OECD Due Diligence Guidance on Responsible Supply Chains in the Garment and Footwear Sector](#) recommends as good practice for companies to disclose a list of their suppliers, the assessment findings for their suppliers, the corrective action plans of their suppliers, the grievances raised against them and how those grievances were addressed¹.

The German Partnership for Sustainable Textiles (PST)

The PST is a multi-stakeholder initiative bringing together members from the industry (companies and associations), non-governmental organizations (NGOs), including the German Clean Clothes Campaign, trade unions, standards organizations, and the German Federal Government. It was initiated by the German Government in 2014 as a response to Rana Plaza and other deadly accidents in textile factories in Bangladesh and Pakistan. Today, it has around 135 members and its 85 corporate members cover roughly half of the German market (compared with the 100 top-selling companies in the German textile retail industry).

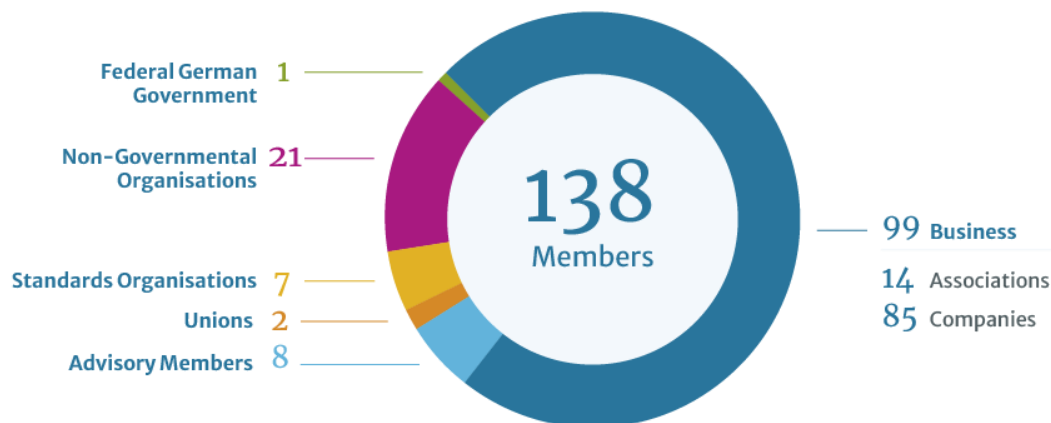


FIGURE: PST members

[source: <https://www.textilbuendnis.com/en/uebersicht/>]

The Partnership is supported by the Partnership Secretariat. On behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ), the Secretariat is hosted by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH / German Corporation for International Cooperation GmbH.

Disclosing:

Transparency on Member Brands` Supply Chains

In the [latest report of the Transparency Pledge Coalition](#), published in December 2019, the PST has been given a rating of "Zero Progress" on the issue of supply chain transparency.

Since then, progress has continued to be minimal. In November 2020, the PST published a voluntary aggregate list of first-tier suppliers of 23 of its 85 corporate members² on the Open Apparel Registry.³ Corporate members that choose to include this voluntary information must provide the PST Secretariat with the names and addresses of (at least) all Tier 1 suppliers used during the last 12 months. The suppliers that they indicate on this list as still 'active' are part of the published aggregated list, whereas 'inactive' suppliers are listed only internally by the PST Secretariat. The list shall be updated at least annually. The PST only recommends its corporate members to publish their data anonymously via this aggregate list on the Open Apparel Registry. **Since the contribution to this aggregate list remains voluntary, the PST is still not driving forward corporate members' practices regarding supply chain transparency and transparency on suppliers is still not linked to the Partnership's membership criteria.** In its current form, the list is of little use. As it remains voluntary and covers only 27% of the corporate members, it does not give a full picture of the factories covered by the PST, not even at Tier 1. In case of complaints, it therefore remains impossible for workers to draw a connection to the PST. Due to its character as an *aggregate* list, it is also impossible to trace incidents at a factory back to an individual corporate member. The only way to learn which corporate members contribute to the list is to click through each individual member profile on the PST website. Since some corporate members of the PST publish supply chain data individually, some even also beyond Tier 1, the aggregate list partly even conceals existing transparency. It is also questionable whether the aggregate list can fulfil its intended purpose for the PST. Due to the Steering Committee, the list shall serve as a basis to identify areas for collaborative activities among PST members. However, so far, such endeavours remain limited to the 23 contributing corporate members, leaving out the vast majority of the PST's corporate members.

The limited willingness of corporate members of the PST to move forward on supply chain transparency became manifest in an internal survey conducted by the PST Secretariat in October 2019. Of the 62 that responded, only 17 corporate members said they were willing to publicly disclose supply chain information. The remaining survey participants were not willing to disclose at all (26 companies) or offered to disclose only internally within the PST (19 companies).⁴ Many of the small- and medium-sized corporate members have stated that publishing their suppliers might attract other larger brands to these suppliers with the result that they might lose production capacity at the supplier to larger competitors. However, this excuse has

been widely refuted and such business risks exist regardless of supply chain transparency. Therefore, such arguments should not deter companies from ensuring the benefits of supply chain transparency such as improved human rights due diligence.

In April 2020, the PST Secretariat published a [“Step by Step Guide to Transparency in the Supply Chain”](#). This guidance document emphasizes the benefits of supply chain transparency as a prerequisite for meaningful human rights due diligence. However, at the same time it suggests that the extent of external transparency is a matter of strategic decisions for each individual company (*“The decision on which data are to be disclosed lies with the decision-makers within the companies and should be based on the purpose of the disclosure”*, *ibid.* p. 16). It also openly acknowledges that the requirements for voluntary, aggregated supply chain transparency under the PST fall far short of the requirements of the Transparency Pledge.⁵

It is also clear that PST fails to keep pace with other Responsible Business Initiatives: For example, the Fair Labor Association has moved to include the publication of supply chain data aligned with the Transparency Pledge at the latest by end of March 2022 as part of their membership requirements; the Dutch Agreement on Garment and Textiles (AGT) requires its corporate members to list their production facilities in an aggregate list published on the Open Apparel Registry. **In effect, the PST is currently stuck in a soft, non-binding approach towards supply chain transparency.**

Supply Chain Transparency: Insights from the FashionChecker

The Clean Clothes Campaign publishes corporate transparency information in its online **Fashion Checker**, active since June 2020 (www.fashionchecker.org). This portal collects information from a variety of sources on the degree of transparency and the payment of living wages along the supply chain of more than 100 brands, shining a spotlight on their individual commitment to effective transparency.

The FashionChecker analysis included 18 PST corporate members (out of a total of 108 surveyed brands). On supply chain transparency three corporate PST members are among the few brands (only six out of the total 108) that achieved the highest rating of 5 stars in the FashionChecker – meaning that the brand discloses name, address, parent company, type of product and number of workers for most production units fully in line with the Transparency Pledge, provides additional information such as a gender breakdown and makes data available in a machine-readable format (for an explanation of the rating please see the Annex).

TABLE: (Non-)Compliance of PST brands with the Transparency Pledge

<i>FashionChecker rating</i>	no. of PST members in the FashionChecker (n=18)	brands
1 star	3	BP., KiK, s.Oliver
2 – 3 stars	11	ALDI Nord, ALDI SÜD, C&A, Engelbert Strauss, Hugo Boss, Lidl, Otto, Primark, Puma, Tchibo, Vaude
4 stars	1	Kings of Indigo
5 stars	3	adidas, Esprit, H&M

One corporate member achieved the runner-up category of 4 stars, being fully compliant with the Transparency Pledge and cooperating with the Open Apparel Registry. Three PST member companies had only one star, revealing that they did not disclose names and addresses of its supplier. A further 11 corporate members were placed between these two extremes by achieving 2 to 3 stars in the FashionChecker, meaning they at least provide addresses (2 stars) or also further information (3 stars), yet not enough to be compliant with the Transparency Pledge.

When looking beyond the FashionChecker data for publicly disclosed lists of PST brands, only 19 out of all the 85 PST brands individually disclose at least name and addresses of their tier 1 suppliers⁶ (see Annex for details).

Conclusion on Supply Chain Transparency

Only a few PST corporate members show that they have understood that transparency matters for meaningful stakeholder engagement and good practice for due diligence, while several of these still need to provide further information to align with the Transparency Pledge. However, the vast majority of corporate members fail to provide any meaningful supply chain transparency.

Reporting:

Transparency on Member Brands' Due Diligence

Within the so-called Review Process, PST members are supposed to carry out an individual risk analysis and on the basis of the results of the analysis, the companies are to derive targets and measures to prevent and mitigate the major social, environmental and compliance risks in their value chains. Since 2017, members of the German Partnership have had to publicly report in a standardized format on how they individually support achieving the goals of the Partnership. To this end, they needed to submit action plans (so-called Roadmaps) that specified what targets they seek to achieve in the coming year, as well as annual progress reports to communicate

publicly on their risk analysis and their responses to address these risks. For each year, certain topics were set as mandatory to set respective targets and report on progress.

In 2020 the OECD's Alignment Assessment⁷ pointed to significant shortcomings in the PST's reporting process, especially the fact that the PST did not make sure that *"companies are carrying out measures that are commensurate with the severity of the issues that they are facing in their own operations and in their supply chains"* (ibid, p. 40). Companies could firstly cherry-pick which risks to prioritise and secondly propose actions that did not necessarily reflect or address the danger or scope of the risk, i.e. **the old PST review process was totally failing to create a meaningful risk analysis. The Partnership has now reformed this review process, but the new process is yet to show whether the PST can make a contribution to the responsible business conduct of its members.**⁸

From 2021 onwards, corporate reporting will have to take all eleven OECD sector risks into account and report in accordance with the risk-based approach specified in the OECD Due Diligence Guidance. Risk-based due diligence means that companies prioritize those risks that are most salient, i.e., risks where harm is most severe, most likely, or affect the most people. Under this revised process, the PST has also switched from annual reporting to a reporting every second year even though the OECD recommends annual reporting.

The reformed concept of the Review Process⁹ additionally specifies further details on the content of public reports of company members ("roadmaps") and a process of external assessment and evaluation of draft reports before their publication.

Public Reports on Brands` Due Diligence Process

Before their publication on the PST website, the "Roadmaps" of company members are externally assessed and evaluated. This process combines elements of evaluation and consulting.

As a first step, company members prepare their roadmaps, including risk analysis, prioritization of risks and targets based on a standard reporting template. The information provided is then shared with a team of external reviewers composed of one person from the PST Secretariat and one external due diligence expert.¹⁰ A set of guiding questions derived from the OECD Due Diligence Guidance provides a general framework what the external review shall focus on, such as the adequacy of the methodology of the risk analysis, the plausibility of the results of the risk analysis and the prioritization of risks, and the risk-adequacy of suggested targets and measures. Based on these guiding questions, the review team discusses the information provided by the company in a face-to-face meeting at the company premises. In this meeting, the company can be asked for proof of any point of information as a random verification of correct reporting.

FIGURE: *Due Diligence in the PST - the PST Review Process*

[source: <https://www.textilbuendnis.com/en/der-review-prozess/>]



The review team can recommend or require improvements of the initial roadmap / report, including the targets and measures. In case that the review team requires changes to the report, members need to correct the report before the final publication date, otherwise the company is expelled from the Partnership.

The German Institute for Human Rights, which is the National Human Rights Institution according to the UN Paris Principles, will act as an observer to the review process and will prepare a report that evaluates whether the process is useful to facilitate the implementation of due diligence. However, it will directly observe only 10% of the meetings between company members and the external review team and only where companies have consented to its participation.

Content of the Public Brand Reports

The new public brand reports – “roadmaps” - must include the following components:

- overview of **key information** about the company and its supply chain management¹¹;
- description of the company’s **methodology** for conducting a risk analysis; the description is structured according to a list of questions¹²;
- a report on the **results** of the risk analysis, progress on previous targets, new targets with specific measures to achieve them, and a justification for not setting a target for a specific risk (non-prioritization of risk) based on a fixed template (see below for more details).

- a report on current percentage of sustainable **cotton**, including the percentage of organic cotton¹³ and specified commitment for an increase in the share of sustainable and organic cotton until the next report.
- a description on existing **complaint mechanisms** and targets plus measures for improving access to effective complaint mechanisms. The existing complaint mechanisms can include local / factory-level complaint mechanisms as well as external back-up complaint mechanisms. In addition, companies must report internally on the number of complaints received since the last report, the mechanisms or other channels used for these complaints, the sector risks addressed by these complaints, the responses to these complaints, and the process for involving stakeholders and victims. Companies may opt to publish this information as part of their Roadmap. The Partnership Secretariat will report in aggregate form on the number of complaints received by company members and the topics addressed in these complaints.

For due diligence reporting it is crucial that stakeholders can derive meaningful information from the reporting. Therefore, it is worth looking more in detail at the reporting requirements for the results of the risk analysis, targets and measures, and justification for not setting a target:

Report on the results of the risk analysis: In the reporting template, company members report the results of their risk analysis for all eleven OECD sector risks. The description of results can be aggregated at the level of a country / region / supplier, tier, or material. Company members may modify the information provided internally in the public report with regard to sensitive business data, especially concerning to the relationship between identified risks on the one hand and targets and measures on the other. In principle, companies are expected to set targets and measures for every OECD sector for which they have identified a risk in their supply chain. Targets have to be formulated as “S.M.A.R.T.” goals, meaning they are specific, measurable, ambitious, realistic, and time-bound. For each target, companies need to describe specific measures that they will take to achieve the target. For each sector risk, the targets and measures can be focused on those countries/regions, tiers, suppliers, materials where the risks are most salient (meaning where harm is most severe, most likely, affecting most persons). The targets and measures must relate clearly to the identified risk and are assessed by the review team for their adequacy in addressing the identified risk. In future reports, companies must specify progress on the targets of their previous report. However, there are several possible exemptions:

- A sector risk may not at all be relevant to a company’s business. For instance, a company not using any fibre from animals may not have salient risks in the field of animal welfare.
- The company can show that they already minimize the respective risk through effective measures. These justifications for not setting a target

must be made plausible in the public report. As of now, reference to product standards and membership in other initiatives is not accepted as an automatic justification. The review team will check the appropriateness of these measures for each sector risk individually.

- The company lacks leverage to address the specific risk. In this case, the company has to show how it has sought to generate leverage through cooperation with other actors. The Partnership Secretariat collects these cases to generate recommendations for collective engagement, for instance, through Partnership Initiatives with other PST members. Given the lack of supply chain transparency, it remains unclear how specific such recommendations for collective engagement and leverage can be.
- The company currently lacks resources to take effective measures. In this case, the company may set targets with a longer timeframe and describe measures that do not allow the achievement of the target.¹⁴ It remains unclear, how broadly a company may define a “lack of resources”.

Conclusion on Reporting Transparency

While the old review process was missing the point of a meaningful risk analysis, the new reporting framework as of May 2021 promises to better reflect how companies implement due diligence. However, the exemptions given to companies on setting some specific targets/risks and the structure of the dialogue-based review procedure (based on guiding questions instead of benchmarks or clear key performance indicators) leave a lot of room to water down the overall level of ambition of the roadmaps. The first round of the new Review Process in 2021 and the publication of the resulting roadmaps will show whether or not the Partnership and its members are moving towards meaningful due diligence processes.

Demands and Recommendations

As pointed out by CCC and others in earlier studies and papers, “reports produced by companies in the context of their membership in MSIs [...] fall short of providing an accurate and complete picture of HRDD practice”.¹⁵ The analysis of the PST’s approach to transparency confirms that the PST has set few mandatory minimum standards for its corporate members to adhere to regarding supply chain transparency. In addition, the reporting requirements for due diligence implementation have gaps and loopholes and the process for external review of the reports lacks robust benchmarks and key performance indicators. As long as these gaps remain, **PST membership cannot be considered as evidence that a company adequately implements human rights due diligence (HRDD). Effective binding human rights due diligence and corporate accountability legislation at the German and European level that cover the majority of brands and retailers in the textile, garment and footwear industry are therefore urgently needed to address the underlying practices that lead to human rights abuses. Such laws should include robust requirements on supply chain transparency.** Recent studies confirm that as long as voluntary initiatives such as the PST do not set mandatory minimum standards, MSIs are “creating a misperception that they are effectively addressing human rights concerns when they are not.”¹⁶

By making progressive public supply chain transparency a membership requirement, the PST could ensure further progress of its corporate members on this crucial issue. To effectively address transparency, the PST and its corporate members should commit to the following minimum requirements in line with CCC recommendations on transparency¹⁷:

The German Partnership for Sustainable Textiles needs to:

- bridge the transparency gap among corporate members, regardless of size or business model, and exert leadership by making supply chain transparency a condition of membership.
- require all supply chain information—whether published by companies or the PST—to comply with the Open Data Standard for the Apparel Sector and submit information to the Open Apparel Registry.
- mandatorily track which companies are transparent about their supply chains and periodically publish these lists to inform consumers, investors, and broader civil society.

- specify clear mandatory requirements for reporting on human rights risks, impacts and their management¹⁸
- publish information on its members' human rights due diligence in a format that allows for an evaluation of the aspiration level of companies' targets and the adequacy of the measures taken to cease, prevent or mitigate harm in their supply chains.

Member companies (regardless of size and business model) need to:

- commit to and implement the Transparency Pledge by disclosing names, addresses, and other details of supplier factories.
- begin publicly disclosing other tiers of the supply chains, including mills and farms.
- align published factory lists with the Open Data Standard for the Apparel Sector and consider submitting the information to the Open Apparel Registry.
- disclose data using machine readable supplier lists, including wage data, gender breakdown of roles in each factory, migrant workers as share of workforce in each factory, and presence of unions or worker committees in each factory.
- publish comprehensive information in line with the OECD DD Guidance that allows for an evaluation of the aspiration level of companies' targets and activities, following a minimum reporting standard.

Annex

Methodology

As a member of the PST's steering committee and working groups, the German Clean Clothes Campaign has a clear insight into PST structures and processes. Additionally, research on brands' transparency has been undertaken through a brand survey within the context of the project "Filling the Gap: Achieving Living Wages through improved transparency". This 3-year project co-funded by the European Commission (DG DEVCO) involves 17 CCC partners from all over Europe (Austria, Belgium, Croatia, Czech Republic, Finland, Germany, Hungary, Italy, Poland, Romania, Sweden and The Netherlands) as well as partners from China and Indonesia. For the brand research 108 brands and retailers from 14 countries were contacted for surveys and survey data were complemented by desktop research. The research has been consolidated with input and comments from stakeholders working on and in the PST and other MSIs (such as the Dutch Covenant and the Fair Wear Foundation) and the wider CCC network.

Transparency Rating on the FashionChecker

1/5 stars

This brand provides no information on the supplier factories and garment workers in its supply chain which is required by the transparency pledge.

2/5 stars

This brand provides some, but not enough information on the supplier factories and garment workers in its supply chain.

3/5 stars

- a) This brand provides basic information like supplier factory names and addresses, product type, number of workers, and supplier group, if the supplier factory is part of a larger entity; or
- b) this brand provides some, but not enough information on the factories and garment workers in its supply chain; it publishes in a practical, machine-readable format; or
- c) this brand provides some information beyond the basics but falls short of the minimum needed for the transparency pledge.

4/5 stars

- a) This brand provides information beyond the basics such as the gender composition of the workforce if there is a union or if there is a collective bargaining agreement in place; or
- b) this brand provides basic information in a practical, machine-readable format such as Excel spreadsheets which makes the data usable for others.

5/5 stars

This brand provides information beyond the basics in a practical, machine-readable format such as Excel spreadsheets which makes the data usable for others.

Recommended Reading

- Clean Clothes Campaign (2020): Policy Paper on Transparency. URL: https://cleanclothes.org/file-repository/transparency_position_paper_ccc_2020-10-15.pdf/view
- Clean Clothes Campaign (2021): Fashioning justice: A call for mandatory human rights due diligence. URL: https://cleanclothes.org/file-repository/fashioning_justice.pdf/view
- MSI Integrity (2020): Not Fit-for-Purpose: The Grand Experiment of Multi-Stakeholder Initiatives in Corporate Accountability, Human Rights and Global Governance, URL: https://www.msi-integrity.org/wp-content/uploads/2020/07/MSI_Not_Fit_For_Purpose_FORWEBSITE.FINAL_.pdf

PST Brands` Supplier Lists

PST brands	Brand`s individually disclosed supplier list	Membership in other MSIs
red	= no information or information does not contain factory name and address	FWF AGT
yellow	= at least factory name and address provided	
green	= information provided at least compliant with the Transparency Pledge	
3FREUNDE	Mila Clothing Ltd	
adidas AG	https://www.adidas-group.com/en/sustainability/managing-sustainability/human-rights/supply-chain-structure/	
Adler Modemärkte AG	no	
ALDI Nord (ALDI Nord Einkauf GmbH & Co OHG)	https://www.aldi-nord.de/unternehmen/verantwortung/lieferkette-non-food/transparenz-in-der-lieferkette-von-textilien-und-schuhen.html	
ALDI SÜD (Hofer KG)	https://cr.aldisouthgroup.com/de/verantwortung/unsere-schwerpunkte/textilien/transparenz-lieferketten-textilien-schuhe	
Alsico NV	no	X
Bead GmbH	no	
Bierbaum Proenen GmbH & Co KG	https://www.bp-online.com/wp-content/uploads/2021/04/RL_BP_Nachhaltigkeitsbericht_2021_DE_v8-2.pdf	X
Brands Fashion GmbH	no	
C&A	http://sustainability.c-and-a.com/uk/en/sustainability-report/2018/suppliers-list/	X
Ceres Dis Ticaret	no	
Chaps Merchandising GmbH	no	
Charle - Sustainable Kids Fashion	no	
Chasin' Wholesale B.V.	no	X
Deuter Sport GmbH	https://www.deuter.com/deuter/documents/social-reports/deuter-social-report-19-20-de.pdf	X
Dibella b.v.	no	X
elkline GmbH	no	

Engelbert Strauss GmbH & Co. KG		https://www.engelbert-strauss.de/Nachhaltigkeit/Overlay/Sozialbericht	X
erlich textil		https://erlich-textil.de/media/wysiwyg/cms/nachhaltigkeit/nachhaltigkeit/csr-report-2019/csr_bericht_erlichtextil_2019.pdf	
ESPRIT Europe Services GmbH		https://www.esprit.com/en/company/sustainability/produce-responsibly/transparent-supply-chain	X
Essenza Home GmbH & Co KG		https://openapparel.org/?contributors=505	X
Explosiv Arbeitsschutz & Industriebedarf GmbH		no	
Gebr. Heinemann GmbH & Co KG		no	
Global Tactics		no	
Gerry Weber International AG		no	
Gotsutsumu GmbH		no	
GREIFF Mode GmbH & Co KG		no	X
GrenzGang		no	
H&M b.v. & Co KG		https://hmgroup.com/sustainability/leading-the-change/supplier-list.html	
HAKRO GmbH		https://hkweb2019fe-prod.azureedge.net/HAKRO_Nachhaltigkeitsbericht_2019.pdf	X
Hch. Kettelhack GmbH & Co KG		no	
Helmut Peterseim		no	
Hess Natur Textilien GmbH		no	X
Hopp KG		no	
Hugo Boss AG		https://group.hugoboss.com/de/verantwortung/partner/beschaffung-lieferanten	
Human Blood B.V.		https://humanblood.de/nachhaltigkeit-arbeitsbedingungen/	
Ivy & Oak GmbH		no	
Jako AG		no	
Karl Dieckhoff GmbH & Co KG		no	
Kaya & Kato GmbH		no	

KiK Textilien & Non-Food GmbH		no		
Kings of Indigo		https://www.kingsofindigo.com/pages/factory-information; https://openapparel.org/?contributors=575	X	X
Lanius GmbH		https://www.lanius.com/de/nachhaltigkeit/produktionsstaetten/		
Lidl GmbH & Co KG		https://www.lidl.de/de/geschaeftpartner/s7377419		
Lodenfrey Menswear GmbH & Co KG		no		
Mantis World		https://www.mantisworld.com/who-makes-our-clothes/	X	
Mela Wear GmbH		no		
Mey GmbH & Co KG		no		
NKD Services GmbH		no		
Orsay GmbH		no		
Ortovox Sportartikel GmbH		https://www.ortovox.com/ORTOVOX/catalogs/sustainability-insights/de/index.html	X	
Otto GmbH & Co KG		https://www.ottogroup.com/media/protected/docs/supplyChain/Otto-Group_List-of-business-partners-and-factories.pdf for brand Bonprix: https://www.bonprix.de/corporate/fileadmin/user_upload/company/de/unsere_verantwortung/bonprix_Lieferantenliste_05032020.pdf		
P.A.C. GmbH		no		
Paul H. Kübler Bekleidungswerk GmbH & Co KG		no		
Peppermint Holding GmbH		https://www.peppermint.biz/de/ueber-uns/wer-wir-sind.html		
Pervormance International GmbH		no		
Primark Ltd		https://globalsourcingmap.primark.com/		
Puma SE		https://about.puma.com/en/sustainability/social		
PURE STYLE - Clothes Made for Individuals		no		
Rademakers Fur & Fashion		no		X
Retailpraxis GmbH		no		

REWE Group		https://www.rewe-group.com/content/uploads/2020/12/primary-production-facilities.pdf	
s.Oliver Bernd Freier GmbH & Co KG		no	
Sabine Feuerer		no	
Schöffel Sportbekleidung GmbH		https://storage.googleapis.com/schoeffel-b2c-shop-public/pdf/Schoeffel_SustainabilityReport20_A4_DE.pdf	X
SUTURA Einsatzbekleidung GmbH		no	
Sympatex Technologies GmbH		no	
Takko Holding GmbH		no	X
Tchibo GmbH		https://www.tchibo-nachhaltigkeit.de/media/pages/mm_download-files/ffc1a81f21-1621594597/tchibo-manufacturers-and-wet-processing-units-english.xlsx	
Teamdress Holding GmbH		no	X
textilekonzepte GmbH		no	
textilhandel cotton-n-more GmbH		no	
Textilkontor Walter Seidensticker GmbH & Co KG		no	
Topp Textil GmbH		no	
Trigema		no	
Varvaressos S.A.		no	
Vaude Sport GmbH & Co KG		https://nachhaltigkeitsbericht.vaude.com/gri-wAssets/pdf/de/VAUDE-Manufacturer-List-2019.pdf	X
Waschbär GmbH		no	X
Wilhelm Zuleeg GmbH		no	
Wilox Strumpfwaren GmbH		no	

Endnotes

- 1 OECD Due Diligence Guidance on Responsible Supply Chains in the Garment and Footwear Sectorp. 91, URL: https://www.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-responsible-supply-chains-in-the-garment-and-footwear-sector_9789264290587-en
- 2 <https://openapparel.org/?contributors=661>
- 3 The Open Apparel Registry is an open-source platform on which different actors can name production sites. The production sites can then be located with a fixed identification number on an online map with precise GPS data. The Open Apparel Registry currently records more than 58,000 production sites worldwide. The production site lists of more than 100 brands and retailers can be viewed via the registry and the production sites can be located on the world map. Further data, such as audit results, are not displayed via the Open Apparel Registry. The Board of the Open Apparel Registry is multi-stakeholder, including a representative of the international office of the Clean Clothes Campaign. PST corporate members that participate in the aggregate list are: adidas, ALDI Nord, BrandsFashion, C&A, Deuter, ESPRIT, Greiff, H&M, Hopp, KiK, Lidl, MantisWorld, Orsay, Primark, Puma, REWE, s.Oliver, Schöffel, Sympatex, Tchibo, Vaude
- 4 Results of the survey published in: <https://www.hrw.org/report/2019/12/18/fashions-next-trend/accelerating-supply-chain-transparency-apparel-and-footwear>, p. 5
- 5 “Step by Step Guide to Transparency in the Supply Chain”, figure 4, p. 16.URL: <https://www.textilbuendnis.com/downloads>
- 6 3FREUNDE, adidas, ALDI Nord, ALDI SÜD, C&A, ESPRIT, Essenza, H&M, Hugo Boss, Lidl, Kings of Indigo, Otto, Peppermint, Primark, Puma, REWE, Schöffel, Tchibo, Vaude
- 7 <https://mneguidelines.oecd.org/Alignment-Assessment-Partnership-Sustainable-Textiles-PST.pdf>
- 8 <https://www.textilbuendnis.com/download/oecd-alignment-assessment-response-pst/>
- 9 “Gesamtkonzept Review-Prozess 2020”, available only in German at: <https://www.textilbuendnis.com/downloads>
- 10 The external due diligence experts have been determined by a vote of the Steering Committee of the PST. The experts are designated to the review of a company by random draw but are ultimately paid by the company. A

contractual relationship between company and external expert in the past 12 months excludes the designation and experts commit to refrain from taking other contracts from the company for two years. Micro- and small enterprises (max. 49 employees, annual revenue of 10 million €) may choose to be reviewed by a person of the Partnership Secretariat only.

11 Mandatory data points are:

- number of employees,
- product categories,
- top 5 sourcing countries ranked by sourcing volume,
- membership in other initiatives and forms of certification used,
- description of how sustainability is operationally integrated into the business structure,
- a link to a list of suppliers if that is already published elsewhere; if not, there is explicit mentioning of “not provided”,
- types of cotton fibres used, including an estimated percentage for each fibre. With regard to synthetic fibres, such as viscose, modal, polyester, company members that are not yet able to provide exact data or estimates of the tonnes used of each fibre category need to explain this gap and show how they seek to close the data gap (Steering Committee decision in September 2020).
- If the member is a producer (not brand / retailer), description of its own production.

The following data points have to be reported internally, but the company member may opt to disclose them as part of the Roadmap:

- annual revenue in garment and textiles,
- percentage of certified products per certificate used,
- number of 1st Tier Suppliers,
- percentage of overall sourcing volume for top 5 sourcing countries,
- description of the sourcing model.

12 Companies need to provide answers on the following questions:

- Which sources of information and methods were used?
- Did the company, next to a general analysis of all potential risks, focus its risk analysis on specific issues (countries, products/materials, tiers), and if so, which ones?
- Did the company conduct a deeper assessment, such as human rights impact assessments, on specific topics, and if so, which ones?
- Who has been involved in the process of conducting the risk analysis?
- How were views of external experts, stakeholders and potentially affected persons taken into consideration?

13 The Partnership has agreed on list of eligible certifications that are accepted as proof of sustainable and organic cotton.

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- 14 This exemption is not available for the topics of living wages, hazardous chemicals and wastewater treatment, corruption, the goals of increasing the percentage of sustainable cotton used and extending access to effective complaint mechanisms.
 - 15 Clean Clothes Campaign (2021): Fashioning justice: A call for mandatory human rights due diligence, p. 39, URL:
https://cleanclothes.org/file-repository/fashioning_justice.pdf/view
 - 16 MSI Integrity (2020): Not Fit-for-Purpose: The Grand Experiment of Multi-Stakeholder Initiatives in Corporate Accountability, Human Rights and Global Governance, URL:
https://www.msi-integrity.org/wp-content/uploads/2020/07/MSI_Not_Fit_For_Purpose_FORWEBSITE.FINAL_.pdf
 - 17 Clean Clothes Campaign (2020): Policy Paper on Transparency, URL:
https://cleanclothes.org/file-repository/transparency_position_paper_ccc_2020-10-15.pdf/view
 - 18 The Clean Clothes Campaign advocates for the adoption of one reporting standard for all companies and endorses the reporting requirements outlined by the Supply Chains Transparency project:
https://cleanclothes.org/file-repository/statement_civil_society_organisation_supply_chain_reporting_requirements_final.pdf/view