



## **C&A's Commitment to Zero Discharge of hazardous chemicals**

In support of the principles of prevention and precaution<sup>1</sup>, and in line with our overall commitment to water stewardship<sup>2</sup>, **C&A**<sup>3</sup> recognises the urgent need for eliminating industrial releases of hazardous chemicals<sup>4</sup>. According to its approach based on prevention and the precautionary principle **C&A** is committed to zero discharge<sup>5</sup> of hazardous chemicals associated with supply chains and the lifecycles of **C&A**'s products by 2020.

We recognise that to achieve this goal, mechanisms for disclosure and transparency concerning the hazardous chemicals used in our global supply chains are important and necessary, in line with the 'right to know principle'<sup>6</sup>. We will increase the public availability and transparency of our restricted substance list and audit process, and will set up public disclosure of discharges of hazardous chemicals in our supply chain.

To make this a reality **C&A** will continue phasing out hazardous chemicals in our supply chain<sup>7</sup> and we will accelerate the phase out of the highest priority<sup>8</sup> hazardous chemicals. **C&A** will continue to work with brands, material suppliers, the broader chemical industry, NGOs and other stakeholders to achieve this goal.

**C&A** also commits to support systemic (e.g. wider societal and policy) change to achieve zero discharge of hazardous chemicals (associated with supply chains and the lifecycles of products) within one generation<sup>9</sup> or less. This commitment includes sustained investment in moving industry, government, science and technology to deliver on systemic change, and to affect system change across the industry towards this goal.

We commit to continue to share what we learn, our approaches and tools and work with others in finding new solutions and removing existing barriers, and to report progress towards comprehensive chemicals management.

**C&A** understands the scope of our commitment to be a long term vision – with short term practice to be defined in the clarification of actions to follow. An action plan will be set up by **C&A** within eight weeks from the time this commitment was made. This will detail the measures to be taken to implement this commitment including timelines for public disclosure<sup>10</sup> and for the elimination of the highest priority hazardous chemicals.

In addition, we will develop and implement a joint roadmap to detail specific programs and actions that we can take collectively with other brands to drive our industry towards the goal of zero discharge of hazardous chemicals.

The immediate set of actions to be executed by **C&A** within the period of these eight weeks will include the following:

- We will publish **C&A**'s current list of restricted substances within one week after agreement on this commitment. Updates will be published as and when this occur.
- We will request information from our suppliers in relation to the use of APEOs including Nonylphenol ethoxylates in the manufacturing processes.



- We will request information from our suppliers about their chemicals suppliers – specifically on how they control and report on what chemical ingredients they are using.
- We will initiate an investigation as to how to increase the focus on chemicals management and wastewater monitoring practices in a regular, comprehensive, environmental audit programme, with specific attention given to the suppliers with wet processes.

Monday, 21<sup>th</sup> November 2011

C&A Buying GmbH & Co. KG

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<sup>1</sup> *“The Precautionary Principle means that when (on the basis of available scientific evidence) an activity may harm human health or the environment, a preventative approach should be taken – even if the type and full extent of harm has not yet been fully established scientifically. It recognizes that such proof of harm may never be possible, at least until it is too late to avoid or reverse the damage done. The process of applying the Precautionary Principle must involve an examination of the full range of alternatives, including, where necessary, the development of sustainable alternatives where they do not already exist. It is based on the understanding that some (as per footnote 4) hazardous substances cannot be rendered harmless by the receiving environment, i.e. there are no ‘environmentally acceptable’ use or discharge levels.*

<sup>2</sup> *Water Stewardship: C&A is a sponsoring partner of the Water Footprint Network, working also with the University of Enschede in NL and the university of Beijing in China in order to map the water footprint linked to the C&A supply chain.*

<sup>3</sup> *C&A equals C&A Buying GmbH & Co. KG, Duesseldorf, Germany*

<sup>4</sup> *Hazardous chemicals are identified through the evaluation of intrinsic hazards including persistence, bioaccumulation and toxic (PBT), very persistent and very bioaccumulative (vPvB), carcinogenic, mutagenic and toxic for reproduction (CMR), and endocrine disruptors (ED), or other properties of equivalent concern, not just those that have been regulated or restricted in other regions. We recognize the need for continuous review of the identification process and elimination of hazardous substances based on the intrinsic properties science.*

<sup>5</sup> *Zero discharge means elimination of all releases, via all pathways of release, i.e. discharges, emissions and losses from our supply chain (contract factories, material suppliers, and dyeing/finishing facilities) and our products.*

<sup>6</sup> *Right to know is defined as practices that allow members of the public access to environmental information – specifically about the uses and discharges of hazardous chemicals based on reported quantities of releases of hazardous chemicals to the environment, facility-by-facility, year-by-year. Chemicals might initially (for the year 2012 reporting, then to be mutually reviewed) be reported only as a group with likewise chemical structure or similar functions/effects, such as restricted Azo-dyes, heavy metals etc.*

<sup>7</sup> *This means the commitment applies to the environmental practices of the entire company and for the whole product-portfolio of the company. This includes as a long-term vision all suppliers or facilities horizontally across all owned brands and licensed companies as well as vertically up the entire supply chain (including material suppliers and dyeing/finishing facilities, in particular those which include wet processes).*

<sup>8</sup> *Our approach is to prioritize hazardous chemicals that pose the most substantial risk to consumers, workers and the environment.*



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<sup>9</sup> *One generation is generally regarded as 20-25 years. However, we intend to accelerate timelines for elimination and substitution through active engagement with material and chemical suppliers and green chemistry innovation.*

<sup>10</sup> *The first data should be reported to the public by end 2012.*