SUSTAINABILITY: ZDHC



In spite of doubts about the possibility of making manufacturing restricted substance lists (MRSLs) work in such an extended and globalised supply chain as textiles and apparel, the Zero Discharge of Hazardous Chemicals (ZDHC) Foundation believes a global standard, one that all companies can comply with as they attempt to lower the environmental and social impact of clothes production, remains a realistic objective.

ZDHC opens up

Clothing brands may not have liked it much when, in 2011, campaign group Greenpeace began its campaign to "detox" the clothing and textiles supply chain, but many good things have come from it, according to Frank Michel, the first executive director of the Zero Discharge of Hazardous Chemicals (ZDHC) Foundation. In the early days at least, Greenpeace would have been unlikely to include ZDHC as one of the positive fruits of its efforts. It complained initially that the "ambitions and actions" of the foundation, set up in the wake of the campaign, were "out of touch" with what was really happening to land and rivers as a result of apparel production, "limiting its ambition to pilots and promises".

Frank Michel appears to have broad enough shoulders to live with the criticism; besides, this happened before his time. He joined ZDHC exactly a year ago after devoting much of his career to sustainability. He was director of regulation and sustainability management for 1WorldSync, a product information network, and worked for around 15 years before that in governmental affairs and NGO liaison for various industry associations. On arriving at ZDHC he looked critically (in the strict sense) at every aspect of its working structure. What he says he found was a group of people who are "highly ambitious" about developing "in a spirit of collaboration" a set of tools that can make a

A protest at an adidas store in Hamburg in 2014. Brands have been less than pleased at some of the elements of the non-governmental organisations' campaigns to clean up clothes production, but ZDHC believes good things have come out of it.

Greenpeace

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difference to textiles and apparel companies. So far, these tools include a manufacturing restricted substance list (MRSL), details of relevant research and an audit protocol.

When 'standalone' won't work

He believes firmly that the launch of ZDHC by six companies (sports brands Puma, Nike, Li Ning and adidas, as well as fashion retail chains C&A and H&M) made one important point clear. "When, in 2011, they published their joint roadmap [to have zero discharge of hazardous chemicals by 2020], they discovered that having a detox commitment in their pockets was not enough because detox is not something that you can do behind closed doors, as a standalone," he says. Supply chain partners and other "relevant stakeholders", including chemicals manufacturers, academia, regulatory bodies, industry associations and so on, need to know what changes companies are putting in place. Information about objectives and progress towards them has to be shared.

The last 12 months or so have been a time of "tremendous change" for ZDHC, the executive director says. It moved from being a programme run by an external consultant (on behalf of the more than 20 companies that now contribute to its work), to becoming a formal Amsterdam-based, non-profit entity in its own right, using its own people to deliver the programme.

Beyond compliance

A first version of its protocol came out in June 2014 after three years of preparation, and development work is ongoing. Frank Michel thinks that taking a broad view that restricted substance lists (RSLs) are about compliance while manufacturing restricted substance lists (MRSLs) are about going beyond compliance is helpful. In December 2015, ZDHC published version 1.1 of its own MRSL and early feedback has been "entirely positive", the executive director says. He insists that the gap between compliance and 'beyond compliance' is narrowing and that the way to make it narrow further is "collaborative implementation"; this is the way to convince partners in a complex supply chain to accept changes.

Without being specific, Mr Michel says he has reservations about individual corporate or NGO-led initiatives that can "overload" and confuse the supply chain. "They're not always ideal," he says, "and there is potential for significant rebound effects and huge frustration in the supply chain." In the end, what Mr Michel wants to see is one standard that everyone can work to. He thinks automotive provides a good example, with its International Material Data System (IMDS), a joint development on which Audi, BMW, Daimler, Ford and others worked together. It provides car companies with what he calls "an infrastructure everybody can rely on", although he insists that even powerful automotive groups had difficulty convincing chemicals suppliers to submit product information for inclusion.

'Positive' product lists too

He believes it must be a common experience among the organisations that run MRSL-type lists such as his organisation's to receive requests to add more and more chemicals all the time. The question in his mind centres on how to make sure the process for adding a product is robust and how to make sure the list as a whole remains "reasonable" for the companies that have to implement it. At a meeting in Copenhagen in May 2016, ZDHC announced that it will also put together its own chemical registry, aimed at making it easier for manufacturers in the textile and footwear industries to identify alternatives to some of the chemicals in use in the apparel supply chain. It will, Mr Michel hopes, help the industry draw up a 'positive product formulation list' for companies to use. It will also be the backbone of a guide to conformance guidance to its MRSL that ZDHC will publish before the end of 2016. This registry is the result of a pilot project carried out in 2015 by several ZDHC brands.

Research and audits

To allow it to make correct judgements on which chemicals to concentrate on, and in which order, ZDHC has to carry out or tap into up-to-date research. "It's easier said than done," Mr Michel admits. Engaging with chemicals manufacturers themselves is a part of this.

Audits are very much part of the process too. Frank Michel makes it clear that, although there are now "multiple audits", he believes that they are all being conducted "with good intentions". Nevertheless, he says an effort to harmonise the different audits manufacturers have to take part in is now "desperately needed". Practising what it preaches, ZDHC completed its own audit protocol in 2015, but decided not to publish it. "There is a huge potential for synergy with the facility environment module 3.0 of the Sustainable Apparel Coalition (SAC)," Mr Michel explains, "so we have started to harmonise our audit protocol with the SAC's and it will be ready for use by the end of 2017."

Other recent examples of collaboration have included an agreement with the China National Textile and Apparel Council and work with the Business Environmental Performance Initiative that Brussels-based business association FTA has developed. "I think we are really opening up," Frank Michel says.



The first executive director of the Zero Discharge of Hazardous Chemicals (ZDHC) Foundation, Frank Michel.

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