

BURBERRY CHEMICAL MANAGEMENT PROGRAMME 2020 UPDATE

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BURBERRY

LONDON ENGLAND

FOREWORD

At Burberry, we continue to deliver on our commitment to eliminate the use of chemicals that may have a negative environmental impact, going beyond the required international environmental and safety standards.

In recognition of this, and aligned with our commitment to Greenpeace, we commissioned this external review of our chemical management programme during 2020 to verify achievements and identify opportunities for improvement. The following report details the findings of the independent review.

AUTHOR'S NOTE

In order to complete this report, I was granted access to Burberry systems, databases, teams and suppliers.

I conducted face to face interviews with team members from all key disciplines in the London head office and in the regional office in Italy and these were supported by detailed questionnaires.

I also interviewed key vendors and raw material suppliers one-on-one, both in an office setting and during a factory assessment, and they were clearly able to speak openly and honestly about their relationship with Burberry and the positive and negative aspects of the chemical management programme and the approach adopted.

In nearly 25 years of managing restricted substances in brands and supply chains I have almost always encountered a level of push back from commercial and creative disciplines that undermines the efforts of chemical management teams to some extent.

At Burberry I experienced almost complete buy-in to the concept that all components must meet the business standards and an acceptance that it was reasonable to demand more stringent standards than required by law or by mainstream fashion brands.

Similarly, with vendors and raw material suppliers, there is an acceptance that what Burberry is trying to achieve, and how they are trying to achieve it, is reasonable and they are pleased to be part of it. Several commented to me that they believe Burberry is ahead of the curve and working with them to these exacting standards future proofs their business to some extent.

Most vendors and raw materials suppliers commented that they were very appreciative of the fact that engagement with Burberry had improved their business but they would struggle to assign adequate resources to have similar levels of engagement with other brands.

In common with many wider sustainability initiatives, there is praise and criticism for the Burberry Partner Progress Tool (PPT), which has been developed to measure supply chain performance, with some calls for improvements to the scoring system. In my experience, the assessment criteria of such schemes are usually sound but there are always flaws with scoring systems, and they need constant review and refinement.

Ongoing, excellent performance rarely happens without being underpinned by robust management systems but the balance of scoring between written management systems, training and activities and resulting performance must be monitored.

Burberry has deliberately described the PPT as a 'tool' and, provided it is used in a mature way to highlight opportunities to improve, rather than attaining the best score, then it will be beneficial.

In my opinion Burberry is doing a very good job in terms of progressive chemical management and this is only possible because they do a very good job in maintaining a small, stable, transparent supply chain with whom they can communicate quickly, clearly and easily. I can attest to the fact that the supply base is significantly more consolidated than most clothing brands of a similar size.

Phil Patterson

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BACKGROUND

In 2014, Burberry made a commitment to eliminate chemicals that may have a negative environmental impact used in the manufacture of clothing, footwear and accessories¹. Simultaneously, the business also committed to greater supply chain transparency and to drive systemic change in the supply chain in order to achieve those goals.

Over the past six years Burberry has created, developed or adopted four key standards which their partners are expected to meet on an ongoing basis – along with supporting training programmes to eliminate chemicals of concern.

“BURBERRY’S COMMITMENT TO MEET ITS OWN STANDARDS AND POLICIES IS VERY EVIDENT”

THIRD PARTY VENDOR/SUPPLIER*

1. The Product Restricted Substances List (PRSL) – provides maximum allowable limits for the presence of chemicals which can be present in components in finished products
2. The Manufacturing Restricted Substances List (MRSL) – Burberry adopted the ZDHC MRSL with an addendum restricting the full list of Per- and Poly-Fluorinated Chemicals. These limits are applicable for chemicals which can be present in formulations
3. The ZDHC wastewater guidelines (ZDHC WWG) – The WWG has limits for ‘conventional parameters’ such as pH, Temperature, Biological Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) among others, and a non-detection requirement also for all MRSL chemicals
4. Burberry Partner Progress Tool (PPT) assesses in-factory equipment and management systems for storage, dispensing and handling of chemicals, as well as procuring compliant raw materials/chemicals, upstream supplier/sub-contractor performance, and due diligence product testing.

This report considers the progress against these standards. It also considers how Burberry is performing with respect to driving systemic change via a collaborative approach. Interviews and questionnaire-based surveys have been conducted with Burberry colleagues, suppliers and other key stakeholders to gauge satisfaction with the Burberry approach and highlight opportunities for improvement.

*Note: All quotes in this report are taken from answers given in an anonymous survey that was shared with the Burberry Supply Chain and other external stakeholders

¹ https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility_docs/Policies_statements/Chemical_Management/2014/burberry-commitment-on-chemical-management-in-manufacturing.pdf



THE BURBERRY SUPPLY CHAIN AND HOW STANDARDS ARE IMPLEMENTED

Annually, there are several product collections and Burberry ensures details of every component in every style is recorded on Product Lifecycle Management (PLM) software – this includes all components including main materials, linings, and trims (including textile, leather, metals and plastics).

With certain sustainability parameters it is not uncommon for companies to report on selective progress and successes without putting them in the context of the wider supply chain performance.

With a focus on only finished product compliance it is theoretically possible to focus solely on the finished components and products but, when MRSL compliance (chemical inventories in factories) and wastewater are considered, there is a requirement to consider all manufacturing facilities' activities and their input management and output compliance.

Burberry has a relatively small, relatively consolidated supply chain and very close, direct working relationships with finished goods vendors² and key raw material suppliers³.

Burberry suppliers accounting for 93.5% of Burberry's annual production are actively engaged with Burberry's chemical management programme. The remaining suppliers, who account for 6.5% of Burberry's annual production are managed directly or indirectly by the Chemical Managers⁴ of raw material suppliers or finished goods vendors. Burberry endeavours that Chemical Managers are trained by Burberry or through third parties, such as the ZDHC Academy⁵.

**“THE BURBERRY TEAM IS
THE MOST ENGAGING TEAM
I AM WORKING WITH”**

THIRD PARTY VENDOR/SUPPLIER

² Finished goods vendors considers Tier 1 facilities that produce finished product such as Apparel, Soft Accessories, Hard Accessories and Footwear for Burberry

³ Raw material suppliers are suppliers who provide textile, leather and other materials such as polyurethane and may be a vertical organisation that conducts wet processing in-house, or a company that subcontracts wet processing on their behalf

⁴ Chemical Manager refers to the person responsible for implementing chemical management in their own facility and upstream partner/sub-contractor facilities and acts as the point of contact to Burberry

⁵ <https://academy.roadmaptozero.com/>

120

THE LENGTH OF YEARS
WORKING WITH ONE
FINISHED GOODS VENDOR

99.4%

OF INDIVIDUAL MRSL
SUBSTANCES ARE
NOT DETECTED
IN WASTEWATER*

85

THE NUMBER OF
RESPONDENTS
TO THE SURVEY

91%

OF BURBERRY'S
PRODUCTION IS FROM
SUPPLIERS WITH
CHEMICAL TRAINING

2016

2016 THE YEAR
BURBERRY ELIMINATED
SHORT CHAINED PFCS
FROM PRODUCTION

164

THE NUMBER OF CHEMICAL
MANAGEMENT ASSESSMENTS
BURBERRY HAS PERFORMED
(2019 – 2020)

99.25%

OF INDIVIDUAL BULK
TESTS WITH NO
CHEMICAL FAILURES**

1700

THE NUMBER OF CHEMICAL
FORMULATIONS TESTED
USING CHEMIQ

*Details found on page 21

**Details found in Appendix 2

“IT IS CERTAINLY THE BRAND THAT HAS DRIVEN THE MOST CHANGE, NOT ONLY ON PAPER...”

THIRD PARTY VENDOR/SUPPLIER

82% OF TIER 1 PRODUCERS HAVE WORKED WITH BURBERRY FOR OVER 10 YEARS

91% OF TIER 1 PRODUCERS HAVE WORKED WITH BURBERRY SINCE THE 2014 LAUNCH OF ITS CHEMICAL MANAGEMENT PROGRAMME

1 TIER 1 PRODUCER HAS WORKED WITH BURBERRY SINCE 1900

Note: In this report progress is described in terms of numbers of finished goods vendors, raw material suppliers, or wet processors and also in terms of 'units' supplied. This refers to stock units such as a pair of shoes, a coat etc. The figures would be different if reported by value or by weight of materials.

This stable, small and consolidated supply chain is key to Burberry's collaborative approach to chemical management for a number of reasons:

- Direct relationships: It is possible to communicate standards and expectations directly to those involved in the selection and use of chemicals and ensure appropriate training is undertaken
- Stability: It is possible to work on longer term improvement initiatives by providing confidence to suppliers that they will remain part of the Burberry supply chain

The ability to communicate directly, quickly, easily and effectively with partners has enabled Burberry to explain not just what is required in terms of compliance but why it is required, and how it may be achieved.

Via education and training, the intention has been to change the mind-set of supply chain partners from doing what they are told to do, to doing what they know to be the right thing to do.

“BURBERRY HAS POSITIVELY STIMULATED ITS SUPPLY CHAIN”

THIRD PARTY VENDOR/SUPPLIER

IMPLEMENTATION OF STANDARDS IN THE BUYING PROCESS

Burberry places orders with established vendors and raw material suppliers who are fully conversant with the standards and expectations related to chemical management.

When a new partner is introduced into the business there is an established onboarding process and Burberry's sourcing and procurement departments arrange onboarding in partnership with the Burberry Responsibility team and chemical management team. All new partners must be approved and Burberry must be satisfied with the commitment of the partner to the Burberry Responsible Business Principles⁶ before commencing production.

**“BURBERRY CREATED AN
INTERNAL TEAM THAT HAS
SIGNIFICANT IMPACT ON
SUPPLIER SELECTION AND
BUSINESS STRATEGY”**

EXTERNAL RESPONSE

Burberry normally nominates the raw materials with which finished goods must be made and they will almost always be from established component suppliers who are fully conversant with the standards and expectations related to chemical management.

Burberry is a design-led company but all components in samples and bulk production must be compliant with the PRSL and all facilities must be compliant, or working towards compliance with MRSL, ZDHC WWG and the Burberry Partner Progress Tool (PPT).

Where a vendor, raw material supplier or specific wet processing facility fails to meet expectations and demonstrates a poor attitude to improvements or remediation the chemical management team are empowered to work with sourcing and procurement departments to take business decisions accordingly.

**“BURBERRY HAS BEEN
A PIONEER BRAND IN
ZDHC MANAGEMENT,
INVOLVING AND ENGAGING
THE SUPPLY CHAIN”**

THIRD PARTY VENDOR/SUPPLIER

⁶ https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility_docs/Policies_statements/Policies/Updated_Policies/RESPONSIBLE%20BUSINESS%20PRINCIPLES%20-%204.%20Burberry%20Partner%20Non-Compliance%20Policy.pdf



BURBERRY REQUIREMENTS

PARTNER PROGRESS TOOL (PPT) ASSESSMENT

In 2016, Burberry developed and launched an assessment protocol for both vendors and raw material suppliers, which was updated and publicly⁷ released in 2019.

Burberry uses a “traffic-light” scoring system of Red, Amber and Green ratings and sets corrective actions to ensure continuous improvements. Ultimately the scoring system influences sourcing and procurement decisions, and Burberry leaders responsible for vendor and raw material supplier selection have personal objectives set against the chemical management performance of their vendors and raw material suppliers.

Vendors and raw material suppliers with poor scores should demonstrate improvements to Burberry but long-term failure to do so may result in future orders being jeopardised.

Concerns have been raised that orders can be placed with Red-rated facilities. Burberry currently expects corrective action plans to be in operation in such circumstances and there is a target to have no Red-rated facilities by 2022. This forms part of Burberry’s wider responsibility targets, whereby 100% of product must have at least one positive attribute by 2022⁸. A positive attribute relates to social and/or environmental improvements achieved at either raw material sourcing or product manufacturing stage.

“IT DOES HIGHLIGHT AREAS FOR IMPROVEMENT, BUT THE TRAFFIC-LIGHT SCORING APPROACH CREATES AN EMPHASIS ON THE SCORE RATHER THAN IMPROVEMENT”

THIRD PARTY VENDOR/SUPPLIER

Burberry has developed a “Chemical Manager Qualification”, where Chemical Managers who have demonstrated excellent understanding of the PPT Assessment can become accredited by Burberry to perform PPT assessments on behalf of Burberry. This process involves training, shadowing of Burberry or other third parties on PPT assessments, and gap analyses of scores to prove understanding.

To achieve a Green rating, a score of 70% or above must be achieved. A Red rating is assigned to any score below 50%.

⁷ https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility_docs/Policies_statements/Chemical_Management/2019/Burberry%20Partner%20Progress%20Tool%20Use%20Guidance.pdf

⁸ <https://www.burberryplc.com/en/responsibility/creating-tomorrows-heritage.html>

PARTNER PROGRESS TOOL ASSESSMENTS⁹

95%

**% OF UNITS COVERED
BY VENDORS WHO HAVE
COMPLETED ASSESSMENT**

92%

**OF UNITS COVERED
BY RAW MATERIAL
SUPPLIERS WHO HAVE
COMPLETED ASSESSMENT**

PARTNER PROGRESS TOOL GRADINGS¹⁰

	%GREEN	%AMBER	%RED	% YET TO BE GRADED AGAINST LATEST PPT CRITERIA*
APPAREL AND SOFT ACCESSORIES VENDORS	88	5		7
SHOE VENDORS	59	15		16
HARD ACCESSORIES VENDORS	88	8		4
RAW MATERIAL SUPPLIERS	59	16	6	19

*Some facilities have not yet been graded at all and some were previously graded using an earlier version of the PPT with slightly different criteria to the 2019 PPT.

⁹ These figures do not include assessments of vendors or raw material suppliers who have had more than one PPT assessment during this period

¹⁰ Status as of March 20

**“WE CAN SAY THAT THE BURBERRY
PPT IS THE MOST PROFESSIONAL
APPROACH WE HAVE EVER SEEN”**

THIRD PARTY VENDOR/SUPPLIER

ENGAGEMENT AND TRAINING

All partners are briefed on Burberry’s chemical management requirements. The strong, established relationships with finished goods vendors have enabled Burberry to create a “Chemical Manager Community”, comprised of dedicated Chemical Managers covering 98% of units produced.

The Chemical Managers are responsible for ensuring compliance, coordinating chemical management initiatives in their organisations and supply chains, managing corrective action plans at component suppliers and act as the primary contact for the Burberry chemical management team.

**“BURBERRY HAS INVOLVED THE
SUPPLY CHAIN RESPONSIBLY BUT
FIRMLY, THROUGH INTEGRATION
AND PARTNERSHIP SUCH AS
PARTICIPATION IN ROUND TABLES
AND CHEMICAL MANAGER MEETINGS”**

THIRD PARTY VENDOR/SUPPLIER

Additionally, the Chemical Manager Community works collaboratively to find answers to challenges for which there are no obvious solutions, such as highly durable, highly repellent PFC-free finishes for rainwear. Burberry eliminated the use of all PFCs in 2016.

Burberry has developed in-house training on chemical management for the Chemical Manager Community and they are also promoting ZDHC Academy external training.

**“BURBERRY HAS MADE ITS
EXTERNAL SUPPLY CHAIN AWARE
OF ISSUES THAT WERE OTHERWISE
LARGELY UNKNOWN”**

THIRD PARTY VENDOR/SUPPLIER

VENDOR (TIER 1 PRODUCERS) TRAINING AND SUPPORT NETWORK

% OF UNITS COVERED BY VENDORS WHO HAVE ATTENDED ZDHC TRAINING	87%
% OF UNITS COVERED BY VENDORS WHO HAVE ATTENDED FORMAL IN-HOUSE TRAINING	93%
% OF UNITS COVERED BY VENDORS WITH A CHEMICAL MANAGER	98%

RAW MATERIAL SUPPLIER (TIER 2 PRODUCERS) TRAINING

% OF UNITS COVERED BY RAW MATERIAL SUPPLIERS WHO HAVE ATTENDED ZDHC TRAINING	70%
% OF UNITS COVERED BY RAW MATERIAL SUPPLIERS WHO HAVE ATTENDED IN-HOUSE TRAINING	91%

PRODUCT RESTRICTED SUBSTANCES LIST (PRSL) COMPLIANCE

The Burberry PRSL contains the same restricted substances as many other major brands and multi-brand initiatives such as the AFIRM Group¹¹. However, to accelerate the phasing out of several key substances, the maximum allowable limits are lower for many chemical groups in the Burberry PRSL.

Compliance with the PRSL is mandatory and, on occasions, Burberry will initiate corrective action plans where there is a “pass” test result where a listed chemical has been detected below the maximum allowable limit.

During the design and product development process all components must be checked for PRSL compliance and, equally important, new vendors and raw material suppliers are made fully aware of their responsibilities with regards to chemical management.

Despite being design-led, Burberry uses many components across multiple styles and seasons and test results for a component are valid for 12 months provided there has been no change to raw materials or process route/recipe.

This effectively means many products are built from compliant components from known, established manufacturers with whom Burberry has close direct relationships.

Burberry partners are required to share a finished product or raw material test report prior to goods leaving the factory. All chemical failures are reviewed by the Burberry Chemical Management team, along with sourcing, procurement and regulatory and

¹¹ https://www.afirm-group.com/wp-content/uploads/2020/03/2020_AFIRM_RSL_2020_0130_EN.pdf

compliance teams and any non-compliant results require a Root Cause Analysis and Corrective Action.

Burberry keeps detailed records of all test data which informs their own due diligence programmes.

Burberry requires partners to meet standards that are, in many cases, stricter than industry norms or those required by legislation. They have done this because they believe it is possible to eliminate the deliberate use of certain chemicals of concern by careful selection of compliant formulations from the best chemical suppliers and careful attention to detail.

They have, on occasions, had to involve chemical suppliers to make adjustments to their formulations in order to make compliance with the tougher standards achievable.

For the Autumn/Winter 2019 and Spring/Summer 2020 seasons, there were 12436 individual chemical tests conducted on bulk components and finished products for priority chemical groups. In total there were 92 failures against the Burberry standards and less than 50 of these would have been failures against industry standards that other brands use. Details can be found in Appendix 2.

All failures were subjected to Root Cause Analysis and Corrective Action.

BURBERRY PRODUCT TESTING AW19/SS20 COMPLIANCE	
AP	99.6%
APEO	98.2%
AZO DYES	99.9%
CHLORINATED SOLVENT	92.0%
CHLOROBEZENES & TOLUENES	96.5%
CHLOROPHENOL	98.4%
FORMALDEHYDE	99.9%
ORGANOTIN COMPOUNDS	97.2%
PFCS	98.9%
PHTHALATES	98.0%
SCCPS	97.1%

“BURBERRY’S POLICY GOES FURTHER THAN MOST, PUSHING TRACEABILITY AND CHEMICAL DUE DILIGENCE TESTING”

EXTERNAL RESPONSE

RESULTS FROM DUE DILIGENCE TESTING

Burberry has a rigorous due diligence testing programme and this is the most mature part of the chemical management programme, which has been in place for 10 seasons (since 2015).

Where there is confidence that particular chemicals have been successfully phased out, the number of due diligence checks to confirm ongoing compliance has been significantly reduced – this can however lead to increased spikes in % chemical detections and % failures if a small number fail.

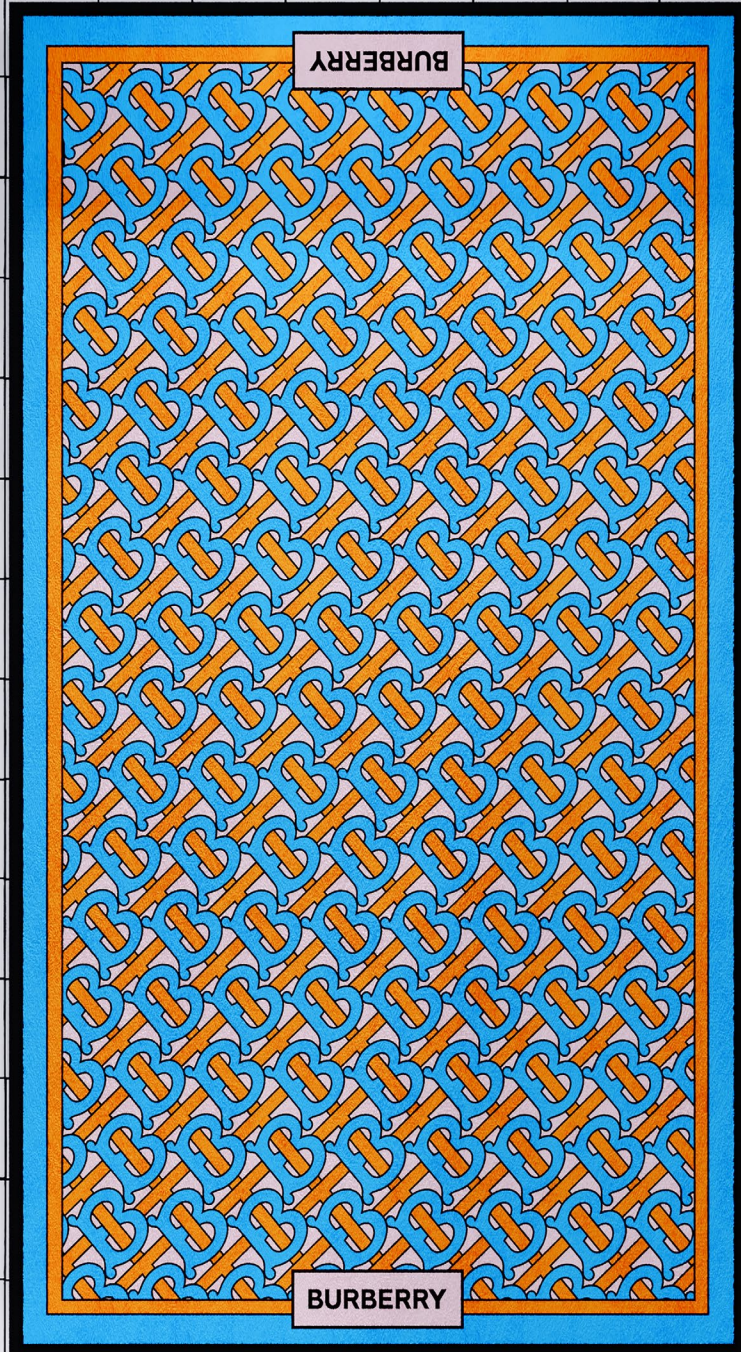
In order to demonstrate the progression of the chemical management programme it is necessary to consider historical results and to put them in context, these can be found in Appendix 1. Overall the failure rate of the due diligence programme has fallen over the years, despite maximum allowable limits for several chemicals being reduced considerably over that period of time.

For priority chemical groups included in the due diligence tests from the start of the programme the picture is positive with decreases in both detections and failures being observed across the board.

However, the due diligence programme is designed to seek out issues and new chemicals are included where there are concerns. For example, chlorinated solvents were included in the Spring/Summer 2020 programme and were detected in 22% of tests – although the Burberry limit is many times more stringent than common RSLs for these solvents and includes additional chemicals, this is now the subject of root cause analysis with partners and the chemical industry.

“BURBERRY HAS HELPED THE FASHION INDUSTRY AS A WHOLE TAKE SOME VERY IMPORTANT STEPS IN TERMS OF CHEMICAL MANAGEMENT”

THIRD PARTY VENDOR/SUPPLIER



BURBERRY

BURBERRY

INDUSTRY PARTICIPATION

Burberry is a member of several independent, multi-brand initiatives including Zero Discharge of Hazardous Chemicals (ZDHC), which Burberry is currently a board member of.

Demonstration of compliance and transparent reporting of MRSL and Wastewater compliance via the ZDHC Gateway is still evolving and therefore these are deemed 'progressive standards':

- Compliance with these standards is expected
- Compliance with these standards does not need to be demonstrated before orders are placed, unlike the PRSL
- Burberry is progressively rolling these standards out across the wet processors and will use the PPT to assess progress and report coverage and levels of non-compliance
- Any non-compliance will be subject to corrective action plans

“THE FIRST LUXURY BRAND TO TAKE A CONCRETE COMMITMENT AND ACTION, THEY OPENED THE DOORS FOR OTHERS WHO FOLLOWED. THEY ARE THE BRAND WHO IS RESPONSIBLE FOR MAKING THE ITALIAN SUPPLY CHAIN A BETTER AND MORE ENVIRONMENTALLY CONSCIOUS ONE”

EXTERNAL RESPONSE

MANUFACTURING RESTRICTED SUBSTANCES LIST (MRSL)

Burberry adopted the ZDHC MRSL¹² in 2015 and partners are expected to ensure all chemical inputs meet these requirements, plus Burberry's restriction on the use of PFCs.

Demonstrating compliance of a factory chemical inventory is an emerging subject and the tools for transparent reporting of levels of compliance are in their early stages.

Prior to 2019, whilst ZDHC were developing the acceptable methods of demonstrating chemical formulation compliance and the tools for transparent reporting, Burberry adopted ChemIQ¹³, an analytical testing methodology which can screen chemical formulations for over 400 analytes. Over 1700 formulations were tested in 30 wet

¹² <https://mrsl.roadmaptozero.com/>

¹³ <https://s3.amazonaws.com/content.stockpr.com/vfcsustainability/files/pages/resources/policies-standards/VF+CHEM-IQ+Method.pdf>

processing facilities and 94% were found to be compliant, with the 6% of failing formulations removed from Burberry production.

Burberry has helped develop an online chemical inventory tool to aid better chemical management practices. The tool was first adopted in 2017, and over 50 Burberry partners are registered, with 25 of these partners being wet processors. This emergent technology provides information regarding the MRSL compliance of chemical inventories in the supply chain. Facilities who do not directly use chemicals can “link” to their suppliers and view with their consent the chemical inventory, for example, a finished goods vendor with a dyehouse. Other brands are also using this online chemical inventory tool, and if a facility that is in Burberry’s supply chain is also being used by another brand, they can also “link” to more than one brand, growing a network and sharing their chemical inventory. Burberry encourages the use of this tool, but it is not mandatory for the supply chain to adopt it.

WASTEWATER GUIDELINES (WWG)

Burberry started conducting wastewater tests in 2014¹⁴ in facilities in their supply base and they have already published detailed results on their website.

Burberry has now committed to promoting the ZDHC Wastewater Guidelines throughout the supply chain and making the results available via the ZDHC Gateway–Wastewater Module, as well as publishing the results and an analysis of trends on Burberry’s website.¹⁵

The ability to demonstrate compliance with MRSL chemicals and conventional parameters (for direct discharge facilities), is considered in the scoring criteria of the Burberry PPT. Burberry expects partners to follow the ZDHC Wastewater Guidelines, meaning testing twice a year, and publishing results on the ZDHC Gateway.

The table below shows details of the tests conducted by Burberry suppliers for the October 2019 round of wastewater testing:

WASTEWATER ANALYSIS OCTOBER 2019	
TOTAL NUMBER OF ZDHC WASTEWATER TESTS	58
% UNITS COVERED BY ZDHC WASTEWATER TESTING	63.3%
TOTAL NUMBER OF WASTEWATER TEST REPORTS WHERE CHEMICAL ANALYTES WERE DETECTED	24
% OF TEST REPORTS WHERE CHEMICAL ANALYTES WERE DETECTED	48%

¹⁴ https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility_docs/Policies_statements/Chemical_Management/2014/JUN14%20burberry_water_testing_for_80_summary.pdf

¹⁵ https://www.burberryplc.com/content/dam/burberry/corporate/Responsibility/Responsibility_docs/Policies-and-Commitments-as-sets/Effluent%20Testing%20Trend%20Analysis%20-%20Oct%20Apr%2019.pdf

TOTAL NUMBER OF MRSL ANALYTES TESTED	10863
TOTAL NUMBER OF INDIVIDUAL ANALYTE DETECTION IN RAW WASTEWATER	62
% OF NON DETECTIONS	99.4%
AVERAGE NUMBER OF MRSL ANALYTES DETECTED PER TEST REPORT (WHERE DETECTED, IN WASTEWATER ONLY)	2.58
TOTAL NUMBER OF CONVENTIONAL PARAMETERS TESTS	1840
TOTAL NUMBER OF CONVENTIONAL PARAMETER WASTEWATER TEST REPORTS	58
TOTAL NUMBER OF DIRECT DISCHARGE FACILITIES	7
TOTAL NUMBER OF DIRECT DISCHARGE FACILITIES TEST REPORTS WHERE AT LEAST ONE CONVENTIONAL PARAMETER DOES NOT MEET FOUNDATIONAL REQUIREMENTS	4
% OF CONVENTIONAL PARAMETERS WHICH MEET FOUNDATIONAL LIMITS IN DIRECT DISCHARGE FACILITIES	97.5%

Breakdown of Raw/Untreated Wastewater MRSL listed chemical tests performed in October 2019

ANALYTES DETECTED	NUMBER OF FACILITIES	TOTAL ANALYTES
0	34	0
1	9	9
2	5	10
3	3	9

4	3	12
5	3	15
6	0	0
7	1	7

Each wastewater test checks on average for 191 specific chemicals in effluent before it is treated and of the individual 10863 tests conducted on raw wastewater there have been 62 analyte detections (~0.6% detection rate).

However, in 24 out of 58 raw wastewater samples tested (48%) there was at least one listed chemical group detected. The WWG are guidelines so this does not represent failure per se but suppliers are required to conduct investigations to find the source of the chemical.

Burberry does not test for sludge at present but is closely monitoring ZDHC activities and recommendations.



STAKEHOLDER RESPONSES

Burberry's approach to chemical management is with a spirit of openness and collaboration and they are keen to understand how the programme is viewed by key stakeholders and how the overall process can be improved.

Interviews were conducted with Burberry colleagues across different disciplines (technical, compliance, buying, corporate responsibility) as well as vendors, raw material suppliers and external stakeholders. Additionally, a survey was conducted to allow stakeholders to provide anonymous, constructive feedback. It was completed by stakeholders including ex-colleagues, other brands, vendors, raw material suppliers, chemical companies, laboratories and NGOs. Full details are provided in the Appendix 3 and 4.

**"I THINK THAT BURBERRY HAVE
ALREADY PLAYED AN IMPORTANT
PART IN THE CONTINUOUS
IMPROVEMENT IN THE INDUSTRY
AND I THINK THAT THEY WILL
CONTINUE TO STRIVE FOR THIS"**

THIRD PARTY VENDOR/SUPPLIER

SURVEY AND INTERVIEW SUMMARY

Burberry is recognised by their partners and external stakeholders as being leaders in the drive to eliminate chemicals of concern from production processes.

Burberry is seen as being extremely demanding of their partners with several praising Burberry for being the most advanced brand in terms of chemical management. It was not uncommon for partners to report that their own businesses have been improved significantly as a result of Burberry requirements and that they feel they have somewhat future-proofed their businesses as a result of Burberry's approach. However, several reported that they would struggle to assign adequate resources should other brands also adopt such a stringent methodology and they would therefore welcome a single, aligned industry approach.

With this in mind, Burberry transitioned from in-house tools and measures (such as their own wastewater testing programme) to those used more universally throughout the industry (e.g. ZDHC) whilst maintaining the chemical management community within their supply chain.

Burberry has a very compact, transparent supply chain. This is viewed extremely positively and is clearly what makes their approach doable – the level of collaboration with a less consolidated supply chain would be more difficult and the approach does not work without transparency to wet processor level.

82%

AGREE THAT BURBERRY
ARE PROACTIVE LEADERS

77%

THINK BURBERRY REACTS
TO INDUSTRY ISSUES
QUICKLY AND CREDIBLY

72%

AGREE CHEMICAL
MANAGEMENT IS EMBEDDED
IN BUYING PROCESSES
AND WAYS OF WORKING

74%

AGREE BURBERRY'S
APPROACH IS MORE
COLLABORATIVE
THAN MOST BRANDS

94%

AGREE THAT THE CHEMICAL
MANAGEMENT POLICIES
AND STRATEGY IS CLEAR

87%

AGREE THAT BURBERRY HAVE
BEEN EFFECTIVE IN THE
ELIMINATION OF CHEMICALS

92%

AGREE BURBERRY HAS
DRIVEN POSITIVE CHANGE

81%

AGREE THAT THE
PPT IS BENEFICIAL

**“BURBERRY HAS RAISED
AWARENESS OF ENVIRONMENTAL
AND CHEMICAL ISSUES IN THE
FASHION SUPPLY CHAIN”**

THIRD PARTY VENDOR/SUPPLIER

Product and wastewater results clearly demonstrate that the elimination of chemicals of concern is working, with detections and failures falling significantly. The ongoing roll out of education programmes to vendors and raw material suppliers with a clearer focus on managing chemical inputs throughout the supply base should see both product failures¹⁶ and discharges to the environment continue to diminish in coming years.

The roll out of the MRSL, Partner Progress Tool and Wastewater Guidelines are viewed positively but there are some calls for greater clarity on how they are implemented. Currently Burberry is being demanding and pragmatic – action plans are required for non-compliances, but suspending business relationships will only be applied for persistent offenders.

**“BURBERRY RECOGNISED IT IS
NOT POSSIBLE TO DRIVE POSITIVE
CHANGE ALONE. IT HAS ALWAYS
COLLABORATED WITH OTHER
BRANDS AND SUPPLY CHAIN
PARTNERS, AND BECAUSE OF THIS,
BURBERRY PLAYED AN IMPORTANT
ROLE IN DRIVING POSITIVE CHANGE”**

EXTERNAL RESPONSE

As with any fashion brand, the search for newness and the desire to place the very best designs on sale requires research and development. Although new materials are developed by existing supply chain partners, it is recognised that there are opportunities to strengthen the chemical approval of new raw material suppliers to the business.

The Burberry approach is respected and the latest version of the Partner Progress Tool (PPT) is viewed positively. Currently Burberry gives Red-rated facilities the opportunity to improve and sets 3 months for corrective actions to be put in place. However, some stakeholders believe that orders should not be placed with ‘Red-rated’

¹⁶ Failures may increase if Burberry reduces maximum allowable limits

facilities until issues are rectified. Burberry has committed to eliminating the use of Red-rated facilities by 2022.

Burberry is recognised by external stakeholders as a leader in the area of change management to the point where there have been calls for them to pioneer other initiatives too.

**“THE PPT IS A GOOD DOCUMENT
AND I THINK THAT BURBERRY
AND OTHERS WOULD BENEFIT
BY SHARING AND WORKING WITH
THE SAME METHODOLOGY”**

EXTERNAL RESPONSE



SUMMARY AND CONCLUSIONS

This report contains details about what Burberry has done, what it has achieved, how it has achieved it and how it has laid out foundations for ongoing improvements.

It is not uncommon for brands to report what has been done and what has been achieved, but it is very unusual to provide this information alongside full details of the supply chain in order to demonstrate how far chemical management practices have been embedded in vendor and raw material suppliers' ways of working.

Not only does Burberry have clear, stringent chemical standards, they know they have been clearly communicated with the raw materials suppliers and that raw materials suppliers who produce the components for 91% of the units manufactured for Burberry have undertaken formal chemical management training, 60% which has been performed by accredited ZDHC trainers. The team knows that vendors who account for 98% of units manufactured have dedicated chemical managers who are part of a supplier community who share best practices across the Burberry supply chain.

One survey respondent commented that the Burberry chemical training session was "one of the best I have ever attended", but as Burberry transitions to more generic industry-wide training, there are some calls for in-house specifics to continue to be covered.

Helping the Burberry chemical management team continuously improve their supply chain implementation is the support from commercial colleagues who maintain a stable, competent supply base that is fully conversant with the Burberry standards.

**"BURBERRY FIRST TRIED
TO UNDERSTAND THE SUPPLY
CHAIN BEFORE CHANGING IT, AND
ALWAYS SOUGHT A DIALOGUE
TO FIND A SOLUTION"**

THIRD PARTY VENDOR/SUPPLIER

Members of the supply chain understand they are part of a select group and see the benefits of consolidation for their own organisations. When asked about the consolidated supply chain with low churn rate, respondents commented that they understood the advantages in terms of easier communication and engagement.

The low levels of pre-assembly component failures of 0.7% and low levels of due diligence failures of 4% indicate (considering that Burberry requirements are much stricter than the industry standard) that progress is being made but there are ongoing efforts to continuously improve supply chain knowledge through training.

Burberry standards are more stringent than industry norms but vendors and raw materials suppliers know that they are really implemented and not just for show. "Burberry's commitment to meet its own standards is very evident" is a typical response when asked about policing.

Burberry has deliberately chosen to involve supply chain partners in the chemical management programme rather than simply demand compliance. This approach has been broadly welcomed by vendors and raw material suppliers, who, seeing the direction of travel for the wider industry, have viewed it as an opportunity to future proof their business.

Burberry's depth of collaboration is what stands out as being different to the majority of brands operating in the chemical management space. The following survey response is from an external stakeholder but sums up the general view: "they believe in engagement, partnership and improvement through dialogue and collaboration rather than dictation and giving the tasks to suppliers. This is the best possible way to engage with the suppliers to meet the objectives however tough and ambitious they are, which are needed for change management."

The two-way dialogue with the supply chain is helpful when rolling out initiatives such as the Partner Progress Tool. Supply chain partners are largely supportive but are not afraid to provide constructive criticism, for example in relation to scoring systems.

This two-way relationship is healthy. Despite the chemical management programme being challenging and resource-intensive when surveyed, 90% of supply chain respondents said Burberry are proactive leaders in relation to chemical management and 92% said Burberry have driven positive change in relation to the way chemical management is approached.

However, from the perspective of chemicals on finished products, suppliers do not particularly want to see standards become more stringent. The standards are, overall, significantly more stringent than the industry average and the law of diminishing returns dictates that, in future, enormous efforts will be required for marginal cumulative benefits.

There are opportunities to improve on-site chemical management practices and monitoring of chemical inputs and wastewater compliance. Burberry has signalled their intention to align with industry-wide programmes rather than pursuing a brand-specific approach and this is likely to meet the approval of their supply chain.

Burberry's supply chain has found working on the chemical management programme rewarding but challenging and several remarked that they would prefer industry alignment of standards and implementation rather than other brands demanding the same level of individual engagement - which they say would be difficult to manage. However, despite concerns about workload, there are some calls for Burberry to extend its programmes further.

**"BURBERRY HAS BEEN
COMMITTED TO STRENGTHENING
COLLABORATION WITH THE
SUPPLY CHAIN AND OPERATING
WITH INTEGRITY"**

THIRD PARTY VENDOR/SUPPLIER



APPENDIX 1: DUE DILIGENCE PRODUCT TEST RESULTS

- Limit of Detection (LOD)
- Allowable limit (AL)
- Parts per million (ppm)
- Not Detected (ND)

AP [Industry Standard 10ppm, Burberry Standard 3ppm]

APEO	AW15	SS16	AW16	SS17	AW17	SS18	AW18	SS19	AW19	SS20
LOD ppm	1									
AL ppm	10		6			3				
AL Recycled						25				
AL Kids Recycled						10				
%detection	7	6	7	3	5	6	0	1	0	0
%fail	1	2	1	0	0	3	0	0	0	0

APEO [Industry Standard 100ppm – EU legislation comes into force in February 2021, Burberry Standard 15ppm]

APEO	AW15	SS16	AW16	SS17	AW17	SS18	AW18	SS19	AW19	SS20
LOD ppm	3									
AL ppm	100		50			25			15	
AL Recycled	250									
AL Kids Recycled						100				
%detection	27	27	21	11	12	7	11	5	3	0
%fail	7	5	7	4	2	4	0	0	0	0

Chlorobenzenes [Industry standard sum 1 ppm, Burberry Standard – Not Detected]

Chlorobenzenes	AW15	SS16	AW16	SS17	AW17	SS18	AW18	SS19	AW19	SS20
LOD ppm			0.1							
AL ppm			ND							
% detection/fail			0	4	3	1	0	0	0	0

Chlorophenols [Industry Standard 0.5ppm each, Burberry Standard sum 0.5ppm]

Chlorophenols	AW15	SS16	AW16	SS17	AW17	SS18	AW18	SS19	AW19	SS20
LOD ppm			0.05							
AL ppm			Sum <0.5							
% detection		48	31	23	28	40	45	10	6	6
% fail		37	14	11	13	20	20	2	6	3

PFC's [C8 - Industry and Burberry Standard Not Detected – EU legislation comes into force in July 2020, C6 - not routinely restricted, Burberry Standard – Not Detected]

C8	AW15	SS16	AW16	SS17	AW17	SS18	AW18	SS19	AW19	SS20
LOD µg/m ²			1-10							
AL			ND							
%detection/fail	18	18	4	5	0	3	0	4	0	9

C6	AW15	SS16	AW16	SS17	AW17	SS18	AW18	SS19	AW19	SS20
LOD µg/m ²			1-10							
AL µg/m ²		2000		ND						
%detection	33	24	37	C6 Banned – if detected this is reported as a failure						
%fail	18	18	4	5	0	3	0	4	0	9

SCCPs [Industry Standard 1000ppm, Burberry Standard -Not Detected]

SCCP's	AW15	SS16	AW16	SS17	AW17	SS18	AW18	SS19	AW19	SS20
LOD ppm		30		50		50sccp	50sccp	50sccp	50sccp	50sccp
						100mccp	100mccp	100mccp	100mccp	100mccp
AL ppm		100	100	ND	ND	ND	ND	ND	ND	ND
%detection		2	0	0	0	19	44	20	0	6
%fail		2	0	0	0	15	11	0	0	6

CHEMICAL GROUPS INCLUDED FROM SS18:

Azo Amines [Industry standard 20ppm, Burberry Standard 5ppm]

Azo Amines	SS18	AW18	SS19	AW19	SS20
LOD ppm	5				
AL ppm	ND				
AL Recycled	20				
% detection	0	2			
% fail	0	2			

Chlorinated Solvents [Industry standard – variable, Burberry Standard Not Detected]

Chlorinated Solvent	SS18	AW18	SS19	AW19	SS20
LOD ppm					0.1
AL ppm					ND
% detection/fail					22

Formaldehyde [Industry & Burberry Standard AL = Kids 16ppm, Adult 75ppm]

Formaldehyde	SS18	AW18	SS19	AW19	SS20
LOD ppm	16				
AL ppm	75				
AL Kids	ND				
% detection	3	5			
% fail	0	3			

Organotin Compounds [Industry standard variable (tbt and tpht 0.5ppm, others 1ppm), Burberry Standard sum of all <1ppm]

Organotins	SS18	AW18	SS19	AW19	SS20
LOD ppm	0.025				
AL ppm	Sum <1				
AL Kids	Sum <0.5				
% detection	17	9	5	0	0
% fail	0	9	3	0	0

Phthalates [Industry standard 500ppm each, Sum 1000ppm, Burberry Standard sum of all 100ppm]

Clorophenols	SS18	AW18	SS19	AW19	SS20
LOD ppm	10				
AL ppm	250				100
% detection	9	14	8	0	0
% fail	9	0	0	0	0

VOCs [Industry standard 1000ppm, benzene 5ppm, Burberry Standard sum of all 20ppm, benzene 5ppm]

VOC	SS18	AW18	SS19	AW19	SS20
LOD ppm					0.1
AL ppm					20
					5 Benzene
% detection					9
% fail					0

APPENDIX 2: BURBERRY BULK PRODUCT TESTING RESULTS – AW19, SS20

ANALYTES DETECTED	AW19, SS20		%	
	FAIL	PASS	FAIL	PASS
AP	4	1022	0.4%	99.6%
APEO	19	1022	1.8%	98.2%
AZO DYES	2	2701	0.1%	99.9%
CHLORINATED SOLVENT	27	81	8.0%	92.0%
CHLOROBENZENES & TOLUENES	7	195	3.5%	96.5%
CHLOROPHENOL	18	1129	1.6%	98.4%
FORMALDEHYDE	4	4666	0.1%	99.9%
ORGANOTIN COMPOUNDS	7	245	2.8%	97.2%
PFCs	3	265	1.1%	98.9%
PHTHALATES	20	987	2.0%	98.0%
SCCPS	1	33	2.9%	97.1%
TOTAL	92	12346	0.75%	99.25%

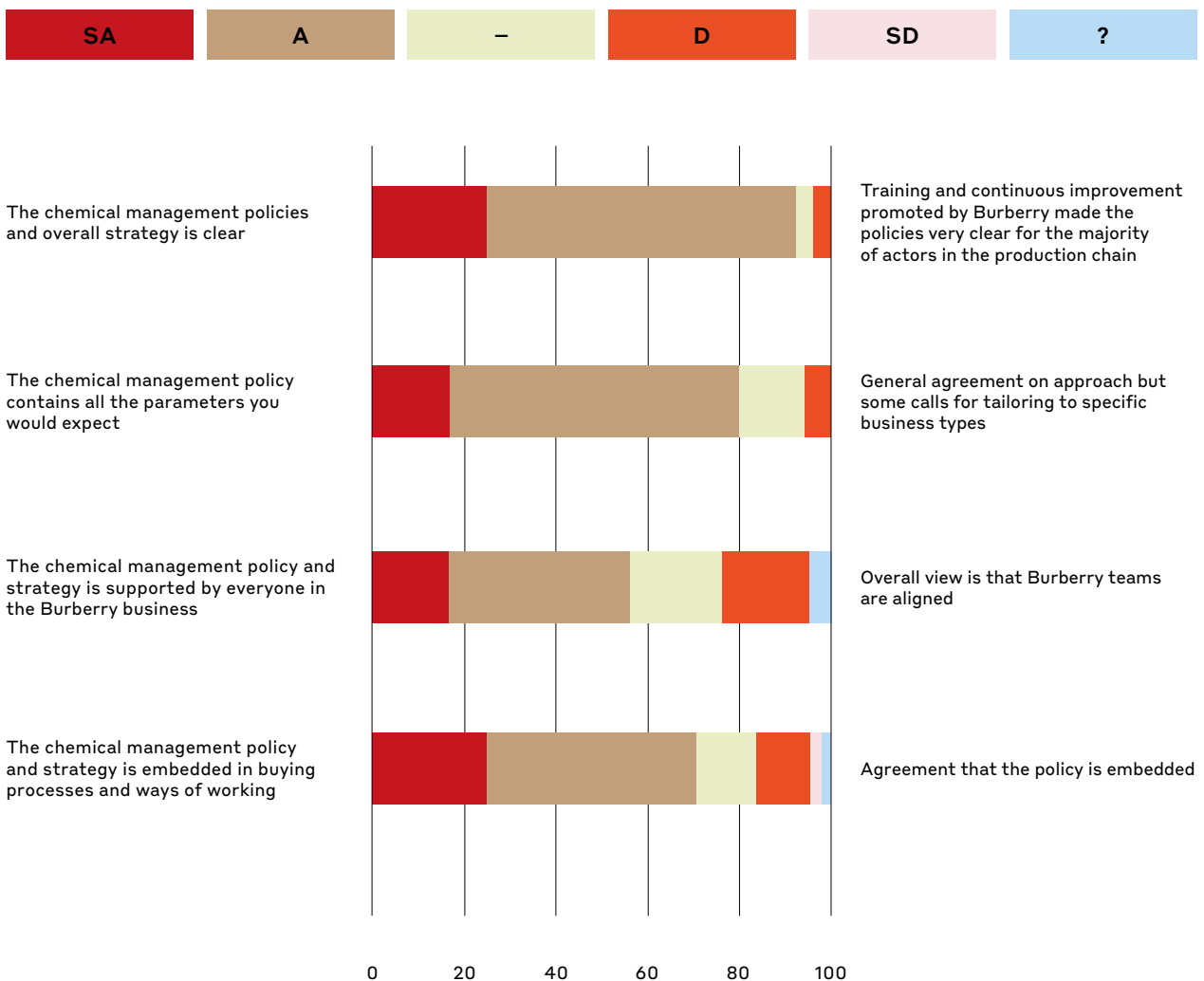
APPENDIX 3: SUPPLY CHAIN STAKEHOLDER SURVEY

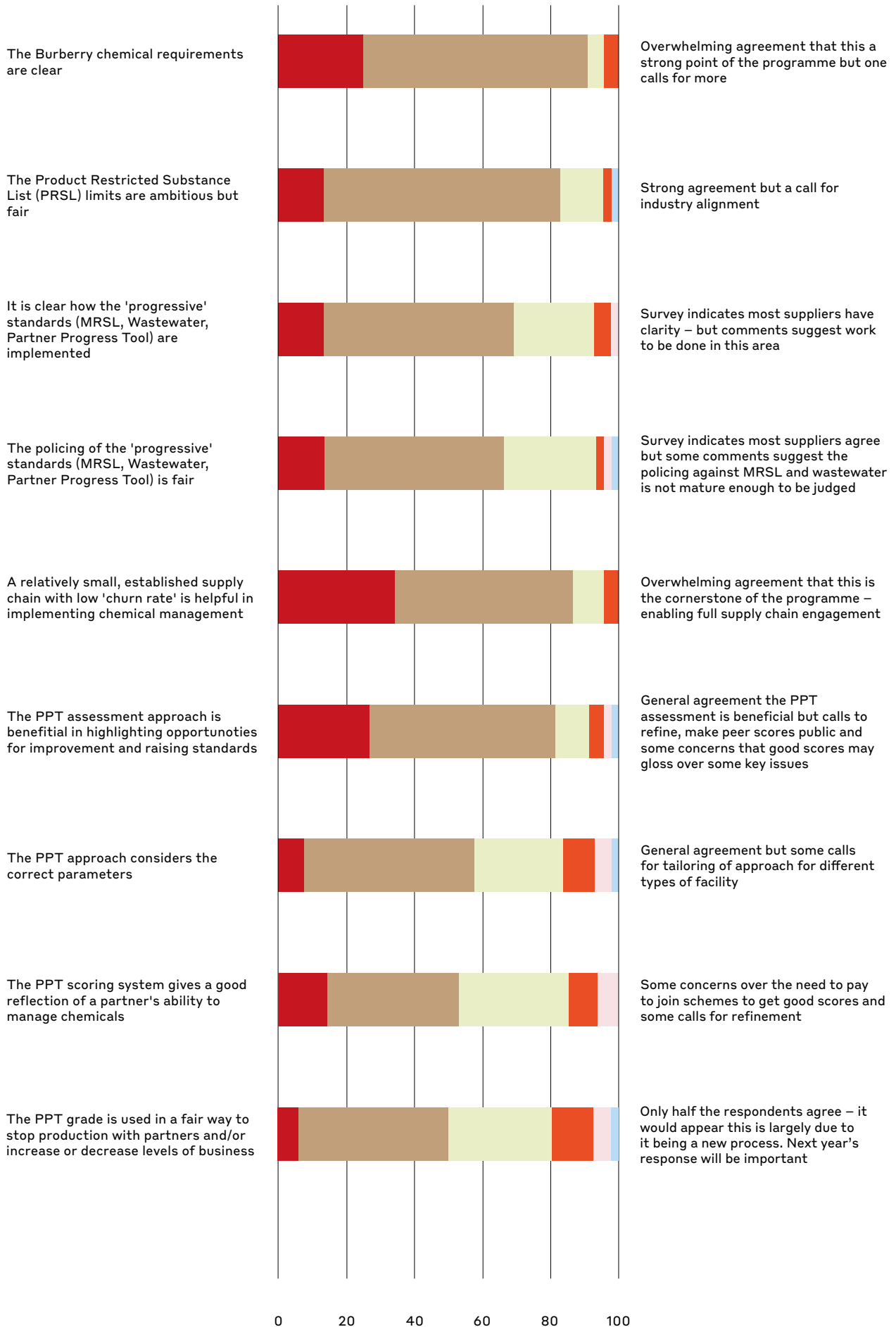
27 statements were provided and participants were asked if they:

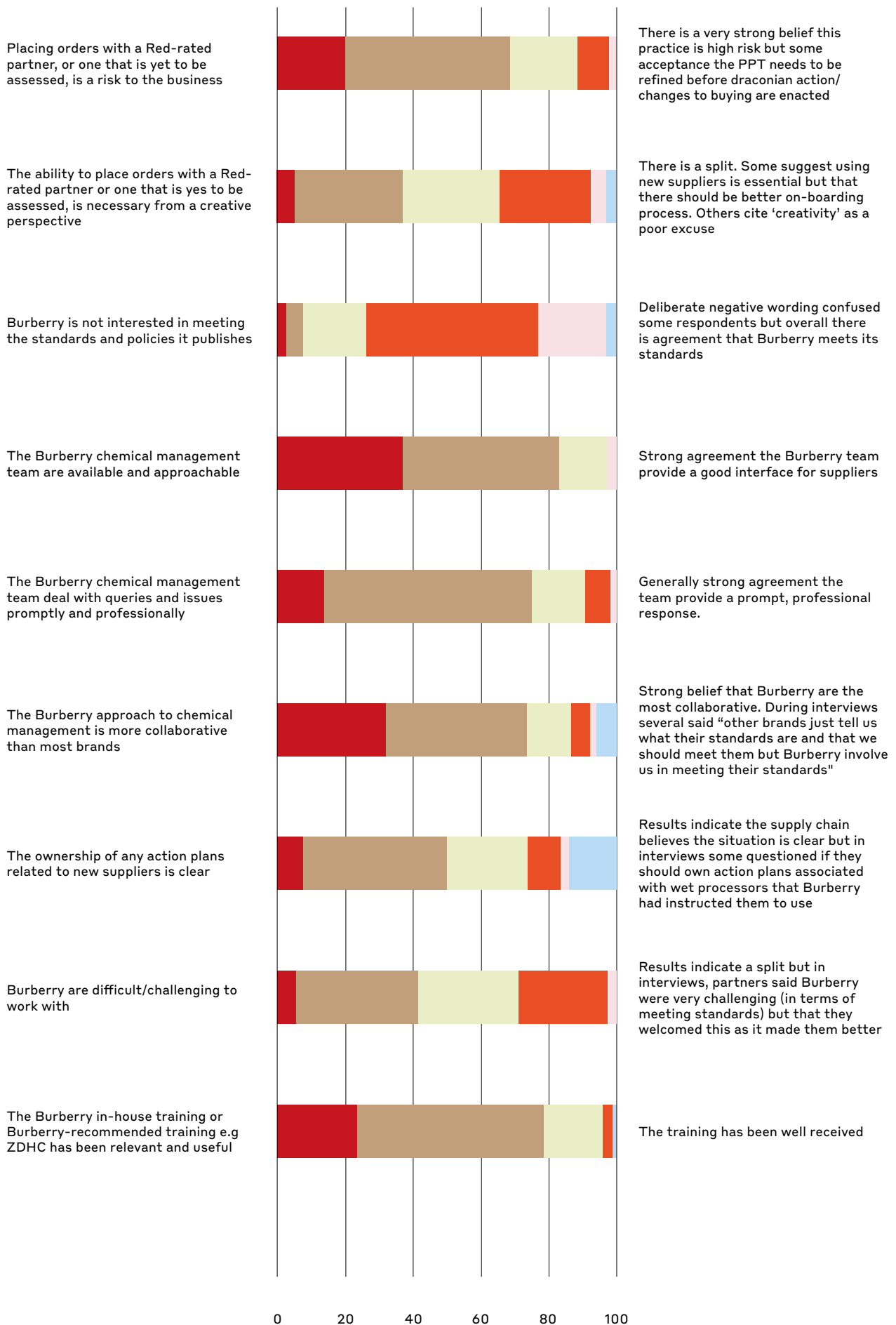
- Strongly agree (SA)
- Agree (A)
- Neither disagreed or agreed (-)
- Disagree (D)
- Strongly disagree (SD)
- Not sure (?)

They were also invited to comment to support their answers and provide general commentary on the Burberry approach to chemical management.

SUPPLY CHAIN RESPONSES – In total there were 65 responses to the questionnaire:







There is a very strong belief this practice is high risk but some acceptance the PPT needs to be refined before draconian action/ changes to buying are enacted

There is a split. Some suggest using new suppliers is essential but that there should be better on-boarding process. Others cite 'creativity' as a poor excuse

Deliberate negative wording confused some respondents but overall there is agreement that Burberry meets its standards

Strong agreement the Burberry team provide a good interface for suppliers

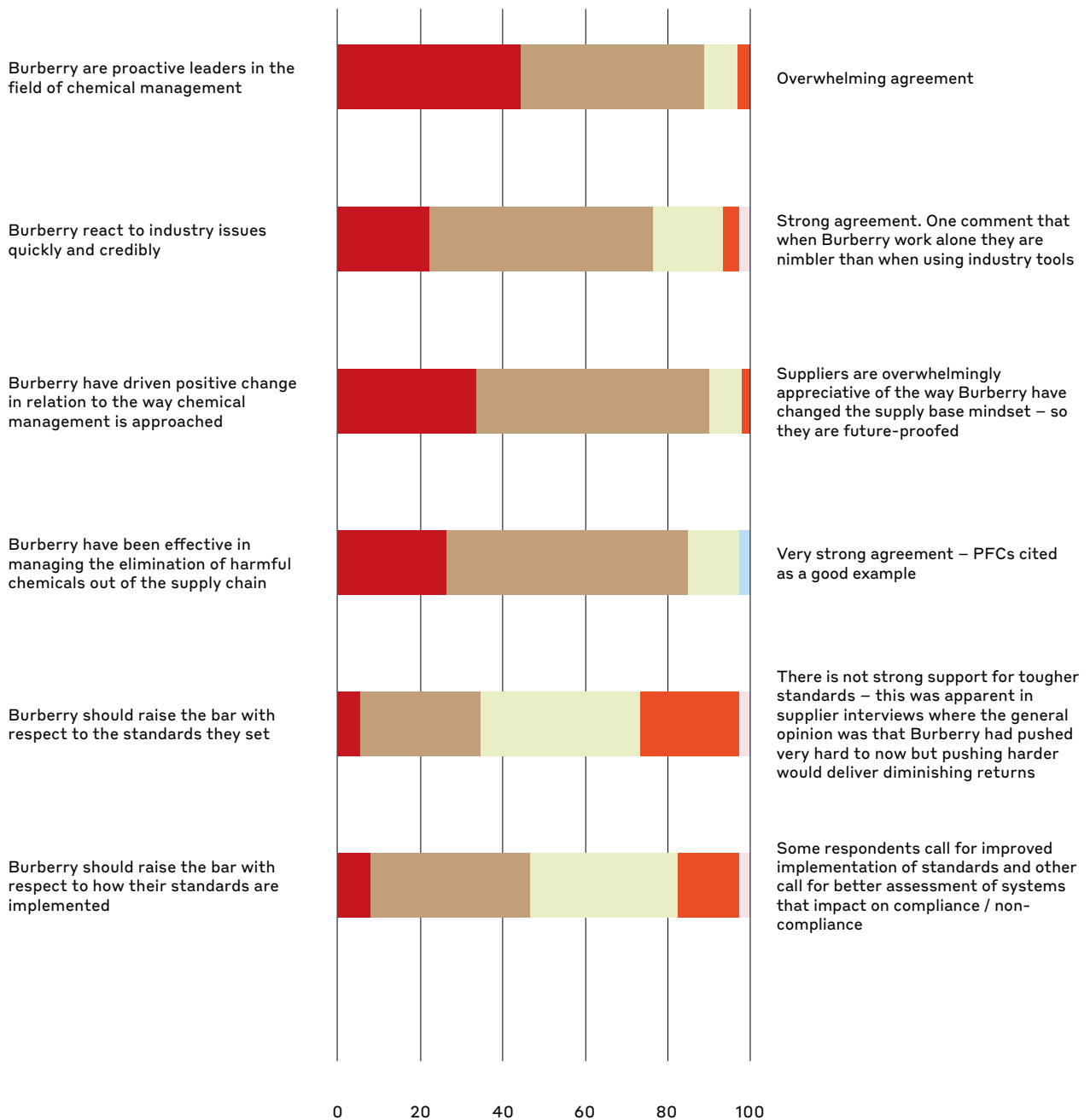
Generally strong agreement the team provide a prompt, professional response.

Strong belief that Burberry are the most collaborative. During interviews several said "other brands just tell us what their standards are and that we should meet them but Burberry involve us in meeting their standards"

Results indicate the supply chain believes the situation is clear but in interviews some questioned if they should own action plans associated with wet processors that Burberry had instructed them to use

Results indicate a split but in interviews, partners said Burberry were very challenging (in terms of meeting standards) but that they welcomed this as it made them better

The training has been well received



FURTHER FINDINGS

HAVE HAVE BURBERRY DONE WELL?

- Clarity of standards and policies and clear communication with supply chain.
- True engagement with supply chain to improve chemical management and to eliminate deliberate use of certain chemicals.
- They have sent out an important message regarding environmental protection.
- Provision of training and the formation of the Chemical Manager Community to enhance understanding and to place responsibility for compliance with supply chain.
- Broken down barriers throughout the supply chain to find solutions via dialogue.
- Created an objective tool and methodology for highlighting risks and opportunities for improvement.
- Burberry have proved it is possible to make positive changes via transparency, collaboration and tenacity

FROM YOUR POINT OF VIEW, WHAT HAS BEEN BURBERRY'S MAIN ACHIEVEMENT/S?

- Changed the mindset of the supply chain from doing what they are told to wanting to implement good practice and looking forward to future requirements.

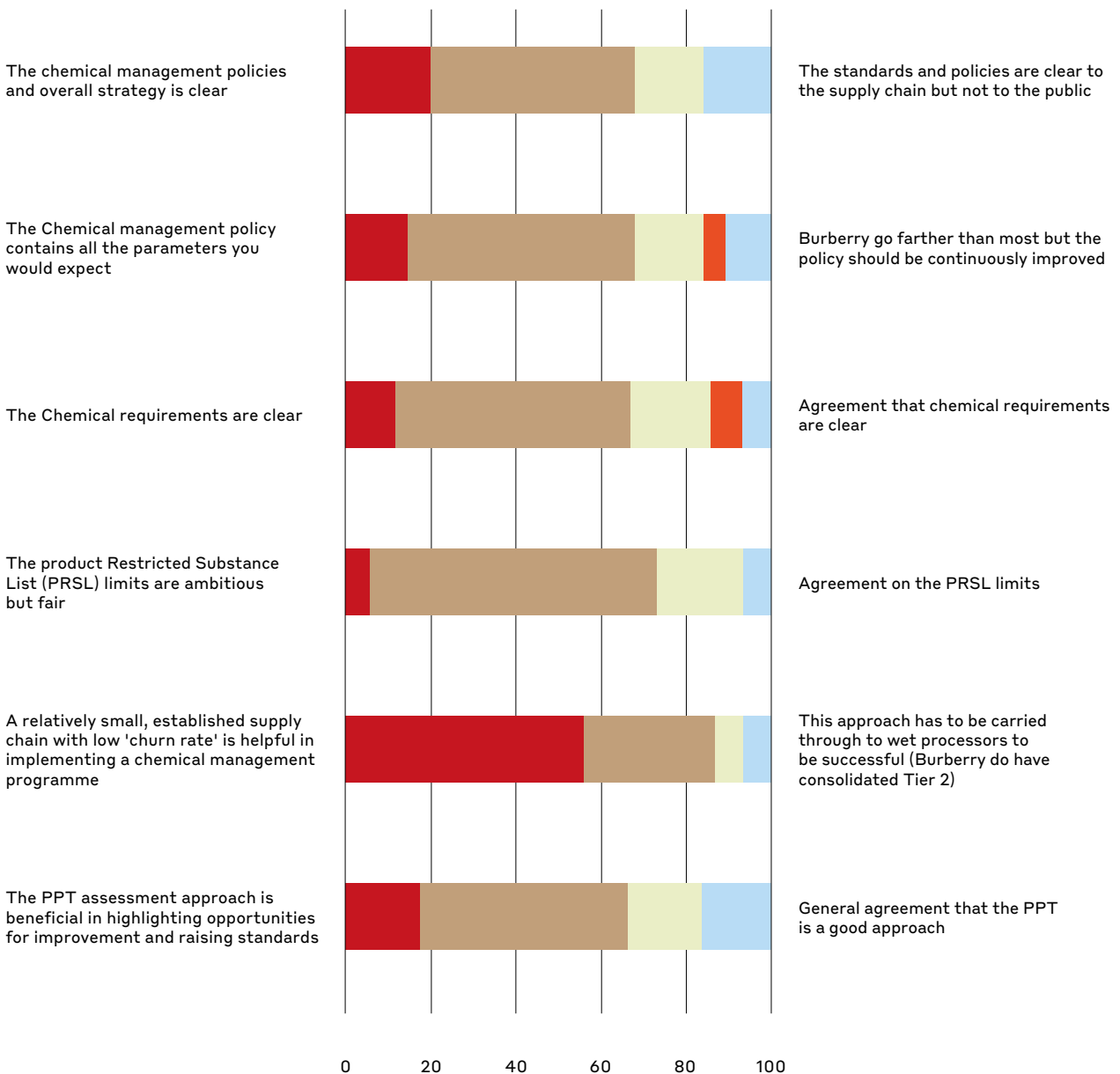
WHAT WOULD YOU LIKE BURBERRY TO CHANGE IN THE FUTURE?

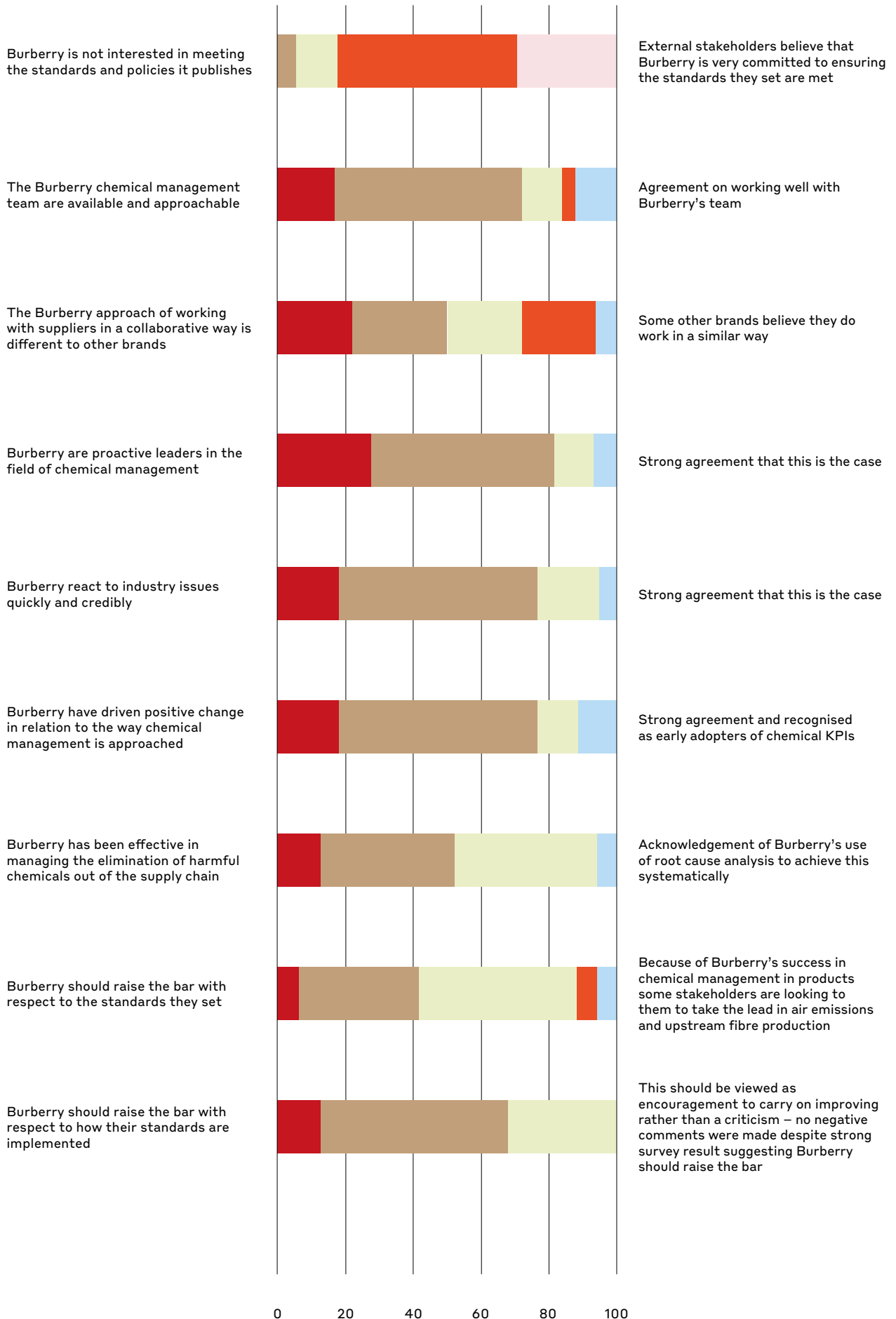
- Industry alignment for sustainability standards.
- Consistency of PPT assessment – moderation of audits and fewer questions that are open to interpretation.
- The most common request was for “more progress” – the supply chain feel they are part of a movement and want to see more training, more labs, greater industry roll out and so on.

APPENDIX 4: EXTERNAL STAKEHOLDER RESPONSES

This groups includes (ex-colleagues, other brands, chemical companies, laboratories and NGOs) and they have given their views based on what they know and their perceptions. They may not be fully informed regarding specific standards and ways of working and there is inevitably a greater % of “not sure” responses.

In total there were 20 responses to the questionnaire.





FURTHER FINDINGS

HAVE HAVE BURBERRY DONE WELL?

- Set clear objectives, communicated them well, collaborated with supply chain and listened to them.
- Provided training and implementation tools in order to make the project a success.

FROM YOUR POINT OF VIEW, WHAT HAS BEEN BURBERRY'S MAIN ACHIEVEMENT/S?

- Establishing strong relationships with production facilities and driving cultural change throughout the supply base.
- Transparency and public reporting.

WHAT WOULD YOU LIKE BURBERRY TO CHANGE IN THE FUTURE?

- Follow through on proposals to reward better facilities with more business
- Demonstrate that Red facilities are being improved.
- Guarantee of business for the supply chain to ensure ongoing engagement
- Expand scope to air emissions and upstream fibre production

GLOSSARY

CHEMICAL FORMULATION: A proprietary mixture of chemical substances that is available for purchase from chemical suppliers under their own trade name

CHEMICAL MANAGER (CM): A person responsible for implementing Burberry's chemical management requirements in all Burberry production and processes

CHEMICAL MANAGER COMMUNITY: Related to vendors and suppliers that receives monthly updates on chemical management activities and that participates in training and sharing of initiatives

CMS: Chemical Management System

CONFORMANCE LEVELS: Assigned to chemical formulations by accredited third-party certifiers to show how confident you can be that a chemical formulation would always conform (Level 0 is the lowest level of confidence and Level 3 is the highest)

DIRECT DISCHARGE: A point source that discharges wastewater to streams, lakes, or oceans. Municipal and industrial facilities that induce pollution through a defined conveyance or system such as outlet pipes are direct dischargers

ETA: Ethical Trade Audit. This forms part of Burberry's compliance program

FINISHED GOODS VENDORS: Any company that supplies Burberry with finished goods

INCOMING WATER (IW): Water that is supplied to a manufacturing process, usually withdrawn from surface water bodies, groundwater or collected from rainfall. This includes water supplied by municipalities and condensation from external sources of process streams

INDIRECT DISCHARGE: The discharge of wastewater to a treatment facility not owned and operated by the facility discharging the pollutants, for example a municipal wastewater treatment plant or industrial treatment park

KPI: Key Performance Indicator, a measurable value that demonstrates how effectively an activity is implemented

MRSL: Manufacturing Restricted Substances List

PPT: Burberry Partner Progress Tool, the framework used to implement the chemical management expectation

PRSL: Product Restricted Substances List

RAW MATERIAL/TRIMS SUPPLIER: Any company that supplies goods or a service to Burberry PLC directly or indirectly. This includes but is not limited to printing, weaving, knitting, dyeing, processing, etc

RAW WASTEWATER (RAW WW): Wastewater that has not yet been treated prior to direct or indirect discharge from the facility, or prior to water recycling efforts

ROOT CAUSE ANALYSIS (RCA): Method of problem solving, by identifying the cause of the failure and why it is happening

RM: Raw Material

UNIT: a single sales unit such as an item of clothing, pair of shoes or a bag. Progress is reported in terms of the % of total units manufactured that are covered by specific standards or initiatives

WET PROCESS: Any manufacturing process that makes use of water in association with chemicals, such as garment dyeing, laundering, printing, dyeing, finishing, tanning etc. Also any process that discharges wastewater (special cases: digital printing is a wet process when the Chemical Managers and the fixation are performed in the same facility; placement print is a wet process when the facility discharges wastewater for example from screen/cylinder washing)

ZDHC: Zero Discharge of Hazardous Chemicals, a group of major apparel and footwear brands and retailers who made a shared commitment to help lead the industry towards zero discharge of hazardous chemicals

ZDHC ACADEMY: A training platform for sustainable chemical management

ZDHC GATEWAY – CHEMICAL MODULE: An online database that provides an easy way to register and browse safe and sustainable chemistry solutions. This builds trust and reduces the administrative burden

ZDHC GATEWAY – WASTEWATER MODULE: An online platform to upload wastewater test reports and share the results simultaneously with all clients

ZDHC INCHECK: A report to show how much a chemical inventory conforms to the requirements of the MRSL

ZDHC WASTEWATER GUIDELINES (WWG): A standard for wastewater discharge and sludge quality