ENVIRONMENTAL & CHEMICAL POLICY (ECP) FOR TEXTILE AND LEATHER PROCESSING

INTRODUCTION

VERSION 4.0
FEBRUARY 2016
CONTENTS

Foreword from Head of GM Technology ................................................................. 3
Introduction ........................................................................................................... 4
How the guide works ......................................................................................... 5
Key performance Indicators ............................................................................. 7
FOREWORD from HEAD OF GM TECHNOLOGY

Dear Supplier,

We launched the first Marks & Spencer Environmental Code of Practice for chemical use in 1998 and I am writing to you to announce the launch of the latest evolution of our environmental and chemical standards.

The new Environmental and Chemical Policy for Textile Processing (ECP) replaces and builds upon the strong foundation of our previous standard (C99) by incorporating the latest information about chemical safety and new legislative requirements. It also provides guidance on the latest best practice for improving quality and efficiency and how the environment can be better protected.

ECP also forms a key part of the Marks & Spencer sustainability strategy, Plan A, which sets out how we will tackle the most important social, environmental and ethical challenges facing our industry through a series of commitments. ECP fulfils Commitment 16.3 of Plan A.

We expect every dyehouse, printer, finisher, laundry, and tannery that supplies product for Marks & Spencer to read the ECP documentation, and submit a fully completed Self Audit (Modules 5 and 5a) prior to production commencing. Completion and approval of the Self Audit is mandatory, and is your formal confirmation that your factory complies with all ECP requirements, a status that is reviewed every 18 months.

It is important to remind you that Marks & Spencer reserves the right to return or recall products which do not meet our stated ECP standards. Non-compliance to ECP requirements may result in a financial penalty being applied to your business.

ECP should be seen by our suppliers as a licence to do business with Marks & Spencer, without which orders cannot be placed. But it should also been seen as a tool that will help you improve the quality of your production, reduce waste, improve your efficiency and be more productive.

Thank you for your continued support,

Yours Sincerely

Krishan Hundal
Head of GM Technology
INTRODUCTION

In 1998 Marks & Spencer became the first retailer to issue environmental and chemical standards for dyehouses, printers and laundries and the Marks & Spencer Environmental Code of Practice (ECOP) is seen as a landmark document to this day. In 2005 this ECOP document was updated to create the Marks & Spencer C99 standard, which combined the requirements Marks & Spencer expects from our suppliers with clear, practical guidance on how to achieve them.

In 2007 the pioneering Plan A Strategy was launched setting out 100 commitments on the most important social, environmental and ethical challenges facing Marks & Spencer, our suppliers and our customers. In 2010, this Plan A Strategy was re-launched with a bolder statement for Marks & Spencer to become the world’s most sustainable major retailer by 2015, an initiative that now has 180 commitments for social, environmental and ethical change.

Within the 2010 Plan A Strategy clear reference is made to the standards expected by M&S of our suppliers in relation to responsible chemical use, efficient use of resources and environmental management. Commitment 16.3 makes specific reference to the M&S strategy for suppliers involved in the wet processing of textiles and leather.

The aim of this commitment is to ensure ALL Marks & Spencer suppliers, including dyers, printers, laundries and tanneries:

- can meet the standards we have for chemical compliance and safety,
- have the tools to reduce their impact on natural resources such as water and energy,
- and use the best practices available to deliver quality products.

The M&S Environmental and Chemical Policy (ECP) is the latest edition of the environmental and chemical standards for our suppliers which incorporates the philosophy and aspirations of Plan A. The information in the following documents will help all suppliers achieve the M&S minimum standards, provide guidance on how they can reduce their environmental impact as well as providing opportunities to improve efficiency and productivity.

You can see full details of the Plan A initiative at http://plana.marksandspencer.com/
HOW THE GUIDE WORKS

The ECP is presented in an easy to read modular format, to deliver all the necessary information a Supplier will need to know to be a compliant and efficient part of the Marks & Spencer supply chain. The modules are grouped as follows:

MINIMUM STANDARDS

ECP Proposer Guidance

Manufacturing Restricted Substance List (MRSL) & Restricted Substance List (RSL)
REACH (Registration, Evaluation and Authorisation of Chemicals)
Minimum Standards and Best Practices for Textile Wet Processing
Minimum Standards and Best Practices for Tanneries
Environmental Management
Self-Audit: Textile Wet Processing
Self-Audit: Tannery
Due Diligence Testing for Chemical Compliance

CHEMICAL GUIDANCE AND BEST PRACTICE

APEO (Alkylphenol ethoxylates)
Azo Dyes and Pigments – Banned Arylamines
PFC Substitution Guidelines and Non-PFC Application Best Practice
Phthalates
Chrome VI Management
New Chemicals Product Safety Evaluation
Solvents
Dimethyl formamide (DMF)
Smart phone app

POLICY DOCUMENTS

Perfluorinated chemicals (PFC)
Polyvinyl chloride (PVC)
Nickel
Nanotechnology
It is vital that each module is read and embedded within the quality and management systems of the factory. If there are any queries regarding the content of the document these should be referred to your contact within the Marks & Spencer Regional Office or the Departmental Technologists.

Throughout the document we provide links to different websites and publications so that you can find further information on different topics. We also provide you with links to some specific company websites so that you can see real examples of some of the best practice and products that we describe in the document. In most cases there will be other companies who provide similar products and services and you are advised to use your available resources to search for alternative providers.

We recognise that we have many exceptional mills in our supply base and accept that many of you will already be following much of the advice in this document, but we urge you to read the advice, follow the links and continually seek ways of improving your business.

**Self-Audit**

The **Self-Audits** contained within **Minimum Standards for Wet Processors and Tanneries** are very important tools. They are the only acceptable record of the capability, capacity and compliance of the factory to the Marks & Spencer standards. It also creates a direct communication link between Marks & Spencer and the factory, to facilitate open **two way** dialogue between supplier and retailer. For these reasons if the self-audit is not fully completed by the factory manager and returned to Marks & Spencer orders will **NOT** be placed with that factory.

The audit has also been designed to help your factory to monitor and reduce its impact on natural resources, the local environment and to help ensure your business is viable for the future.

The local M&S Regional Sourcing Office, or Full Service Vendor’s technical teams, will review these completed audits, which will be filed centrally in M&S Head Office in London. Each audit will be assigned a unique M&S factory reference code to verify the ECP approved status; without this code, your factory is not approved.

The audits will be repeated **every 18 months** following the first audit, to ensure that our records of factories reflect current best practices and capability.
KEY PERFORMANCE INDICATORS

Key performance indicators (KPI’s) are very important for monitoring progress. Marks & Spencer have identified KPI’s which are essential to assess the capability and capacity of a mill to deliver to the Marks & Spencer standards for quality, safety and the environment.

One of the most important KPI’s for a dyehouse is the percentage of Right First Time (RFT) dyeing. This is a measure of the number of batches produced that comply with the customer’s standards without the need for any re-working, additions or re-processing. Marks & Spencer use RFT to determine whether a mill has the capability to supply products to our standards. Factories with low RFT performance figures will undoubtedly have:

- poor control of their internal processes
- higher than average costs of production
- unacceptable levels of water, energy and chemical use
- poor delivery records
- poor quality control

There are two aspects of Right First Time; lab to bulk, and bulk to bulk. The success of achieving the customer’s standards for shade and fastness for the first bulk batch is indicated by the Lab to Bulk RFT performance. The success of achieving the customer’s standards for subsequent bulk batches is indicated by the bulk to bulk RFT performance.

The most experienced, world class dyehouses can regularly achieve RFT for lab to bulk and bulk to bulk in excess of 90%. These are the factories that Marks & Spencer aspires to work with, as they have clearly demonstrated that their approach to quality control, environmental protection and delivery performance is aligned with the Marks & Spencer values and expectations.

The Marks & Spencer Plan A strategy is a comprehensive approach to sustainability that requires a clear understanding of the current environmental impacts before strategies for improvement can be developed. The sustainability KPI’s that a mill will need to measure include:

- Water usage
- Energy usage
- Chemical usage
- Production volumes per day, week, month
- Machinery utilisation

Marks & Spencer sincerely believe that the modules contained in this ECP will help any dyehouse, printer, laundry or tannery to improve their performance against their KPI, which will in turn lead to improved quality, greater productivity and reduced costs.