VOLUNTARY GUIDELINE ON VEGANISM IN FASHION



INTRODUCTION

The BRC's mission is to make a positive difference to the retail industry and the customers it serves, today & in the future. Our mission is to make a positive difference to the industry and to the customers it serves. Retailers want to provide their customers with the assurance that any vegan product can be purchased with confidence. This voluntary guideline is for those retailers and brands selling fashion products.

Veganism is a fast-growing trend. In fact, many people – some who don't even identify as vegan – seek out vegan products for a variety of personal reasons. This, coupled with the fact that the number of vegans in the UK has doubled between 2015 and 2019, means that vegan clothing and footwear is well placed to launch. Veganism is defined as containing or using no animal products; although some go further and "seek to exclude, as far as is possible and practicable, all forms of exploitation of, and cruelty to, animals for food, clothing or any other purpose."¹

Classing a product as vegan not only rules out using leather, wool and natural silk (which comes from the silkworm), but also many glues, dyes, and chemicals derived from animals. Despite some tests available, retailers believe there is currently no test to definitively confirm the presence of animal DNA in products that will also support supply chain transparency.

Consumers wishing to purchase vegan products are looking for assurances from retailers in the form of certification, labelling, or registration. However, retailers will need to consider all relevant impacts of any alternative materials used in vegan products.

¹The Vegan Society. <u>vegansociety.com</u>

It should be stated emphatically that retailers should not claim the product is sustainable simply because it is 'vegan'. 'Vegan' relates to the absence of animal-derived materials whereas 'sustainable' will mean different things depending on the issue analysed (including embedded water, carbon footprint, and more.

Vegan products should offer consumers with an alternative to products that are traditionally made using animal-derived materials or ingredients, where the animal-derived component (e.g. leather) has been replaced with a non-animal derived alternative. Any product that is not traditionally made with animalderived materials is not in scope. This means a cotton t-shirt should not be labelled as 'vegan' as it is traditionally made from cotton.

SCOPE

For the purposes of this guideline, the term "vegan product" is classified as clothing, textiles, accessories, footwear, etc. that contains no animal-derived components. This includes animal-derived materials, adhesives, and chemical ingredients used in the manufacturing such as dyes, pigments or inks.

HOW TO SOURCE A VEGAN PRODUCT

Retailers will need to take a sequence of steps to ask questions internally and of their suppliers of which materials will fall under the 'vegan' label and where the risks are. Below is a flow chart to help manage your decision-making dependent on your supply chain and product:



Be aware that not all synthetic materials necessarily mean they are vegan so you will need transparency of chemicals in the synthetic materials to validate vegan requirements. And lastly, be aware that vegan products / materials can be made in non-vegan factories so there is an element of cross contamination to consider. Good manufacturing practices and segregating where possible will help reduce the likelihood of being cross contaminated.

MATRIX OF QUESTIONS TO ASK INTERNALLY:

	What to consider	Where to start	How to do it	Who to ask (fill in)
1. CHECK SCOPE: MAPPING	What is required to produce the product (i.e.: could it potentially be made from animal-derived materials)? See APPENDIX 1 below for which materials and ingredients are common. Who are your immediate suppliers and who supplies them?"	Start by mapping major materials, components, and processing aids against product categories Create a visual map of your product supply chain	Review your current materials list which can be obtained from your buying or suppliers. Refer to your Bill of Materials (BOM) template in this guideline.	
2. CHECK MATERIALS: IDENTIFYING	 Which of your suppliers are crucial? Are there any alternative suppliers you could use? What are the risks to your business continuity, integrity, market presence, and reputation? What materials are you sourcing that could be the subject of media attention or other concerns? Does the supplier use animal derived materials or ingredients in its facilities or factories? 	Identify materials that have been mentioned in the media or by campaign organisations Effective measures can be taken to avoid cross- contamination of the vegan material by direct or indirect contact with contaminated material that is in the initial stages of the process (i.e.: ensuring persons handing raw or semi-finished materials are wearing protective clothing).	Ask your suppliers to confirm that none of the materials contain animal derived ingredients or by-products. Refer to the animal-derived ingredients or materials list in this guideline. Be aware that certain materials are used more commonly in some countries than others.	
3. RISK ASSESS: PRIORITISING	Are your suppliers direct or indirect? To what extent can your business influence these suppliers or do you need wider industry collaboration?	Seek input from your marketing, procurement, sourcing, regulatory, or technical teams to help assess the key risks and potential opportunities Create a risk matrix: timeline, importance to which stakeholders, ability to impact business operations, etc.	Where animal-derived materials or ingredients are identified, explore alternative options for your products. Consider all relevant impacts of any alternative materials used in vegan products and ensure it complies with brands' policies, (i.e. chemical and animal welfare).	

4.1 OVERALL DECISION: CREATING	What measures are feasible to address the priority risks and opportunities? Who is responsible for delivering the different aspects of the plan? Do you have support from your senior leadership team to address your plan? How can you best involve your suppliers?	Set up meetings with suppliers and relevant teams to explain why your business cares about elevating this issue	Create an action plan and set up meetings with suppliers and relevant teams to explain why your business cares about elevating this issue.	
4.2: OVERALL DECISION: IMPLEMENTING	Do your suppliers need on-going support to improve performance? How best can you measure and report progress to senior management and across the broader organisation? What are the avenues for wider communication and promotion of progress (ie: company reports, trade associations, press releases, etc.)?	Consider integrating relevant parts of the action plan into suppliers' contracts Agree a timetable for reviewing the action plan and regularly check it is on track Make sure all employees involved have the support and resources they need (ie: are there any training needs?)	"If available, explore animal DNA testing of your products in conjunction with supply chain transparency. Once you are assured no animal-derived materials are in your vegan products, you may wish to seek out relevant certification labels or registration to better communicate to your consumers and suppliers	

Note: if you are a smaller business and don't know where to start, try answering a few basic questions first: What are your key raw materials? Where do they come from? What are the typical inputs for producing the types of products you source?

APPENDIX 1 [AVAILABLE AS A DOWNLOAD] LIST OF ANIMAL-DERIVED FIBRES AND MATERIALS*:

Animal Materials & Fibres		Colourings & Dyes		Glues & Waxes		
Shearling including but not limited to: Exotic skins such as Alligator Sheep / Lambskin Goat Pig Cow Calfskin Buffalo Catgut (type of cord made from walls of sheep / goat intestines) Chamois Silks Anaphe (moth) Antheraea (moth) Byssus (sea silk made from mollusc) Doupioni Eri	Wool / Animal hair Alpaca Angora Boar bristles Camel hair Cashgora Cashmere Guanaco (Ilama) Horsehair Huarizo (alpaca) Karakul (sheep) Kemp (sheep) Llama Merino Mohair Pashmina Pantholops (antelope) Qiviut (muskox) Rabbit Hair Shahtoosh (antelope) Suri (alpaca) Vicuna (Ilama) Yak	Shell Capiz (mollusc) Chitosan (crustacean) Nacre / Mother of pearl Pearl Sea shell Horn / Bone Horn Bone Char Ivory Fur Any animal fur Beaver or Otter fur Feather / down Feather Down	Ingredients derived from insects Carmine / Cochineal Kermesic acid Lac Shellac Tekhelet (snail glands) Tyrian purple (sea snails) Inks from animals Sepia Octopus ink Urea	Milk or egg protein Albumen Casein paint (milk protein) Casein glue (milk protein) To note: Urea (Urine from mammals) can be used to dissolve dyes	Waxes from animals Arachidyl propionate (similar to lanolin) Beeswax Chinese Wax (insects) Lanolin / wax from wool Shellac Wax Spermaceti Glues from animals Bone glue Fish glue Hide glue Rabbit skin glue Gelatin Isinglass	To note: wax is made by either bees or secretion of the sebaceous glands of wool-bearing animals - sometimes found in fabric softeners or water resistant finishes To note: Gelatin and Isinglass are sometimes used to thicken adhesives, made from animal bones or fish

* This list was compiled December 2019 to be non-exhaustive and can be updated to reflect change in trends.

APPENDIX 2 [AVAILABLE AS A DOWNLOAD] EXAMPLE TEMPLATE FOR BILL OF MATERIALS (INCLUDE PHOTO OF PRODUCT FOR REFERENCE):

Vegan Products NOTE: For each and every component that is dyed or finished using chemicals a separate Ingredient List must be completed (see Tabs) along with a signed Declaration confirming that all chemical ingredients have been checked with the manufacturer to ensure that they do not contain chemicals derived from animals.

1. Bill of Materials

Item Number						
Description						
Supplier						
Technologist						
Colour						
PO Number (for batch control)						

No.	List of Components	Generic Substrate type	Specific Substrate type	Component Supplier Name	Vegan Product Declaration Received	Date
	List EACH AND EVERY component - all materials & trims including all 'hidden' components such as shanks, interlinings, stiffenings, backers, edge paints & adhesives/glues	Textile, Synthetic Leather, Rubber, Plastic, Metal, Wood, adhesive, paint	Cotton, polyester, PU, PVC, TPR, etc	Name of supplier of each component	Yes / No	
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

		Signed	Dated
Has this product been produced in a factory with any animal derived components within the factory? (i.e.: leather, glues containing animal derived components etc.)	Yes / No		

APPENDIX 3 [AVAILABLE AS A DOWNLOAD] TEMPLATE FOR VEGAN PRODUCT DECLARATION

I, ______ (name and role), for ______ (name of business) certify that the manufacture and development of ______ (name of components), supplied to ______ (factory name and address);

- does not and has not used any animal product, by-product or derivative;
- does not or has not used testing of any sort on animals (this includes for efficacy, toxicity, safety, cosmetic purposes, etc.) conducted at the initiative of the supplied company or on its behalf, or by parties over whom it has effective control;
- has had the fibre composition of the textile material tested, to confirm it does not contain animal-derived materials;
- does meet our brand policy requirements, including but not limited to chemical and animal welfare policies (i.e.: RSL, MRSL, ECP); and
- that cross contamination has been managed effectively by using good manufacturing practices, including by not limited to: segregating where possible, ensuring protective clothing is worn, etc.



GOING FORWARD

This voluntary guideline was produced in association with industry experts. BRC and its members will continue to work collaboratively across the fashion industry and supply chain to push for more responsible production and greater transparency of materials being sourced and brought onto the UK market.

For more information, please contact **info@brc.org.uk** to learn more about BRC and the member groups that are working to tackle this issue.



THE BRITISH RETAIL CONSORTIUM

The BRC's purpose is to make a positive difference to the retail industry and the customers it serves, today and in the future.

Retail is an exciting, dynamic and diverse industry which is going through a period of profound change. Technology is transforming how people shop; costs are increasing; and growth in consumer spending is slow.

The BRC is committed to ensuring the industry thrives through this period of transformation. We tell the story of retail, work with our members to drive positive change and use our expertise and influence to create an economic and policy environment that enables retail businesses to thrive and consumers to benefit. Our membership comprises over 5,000 businesses delivering £180bn of retail sales and employing over one and half million employees.

> Voluntary Guideline on Veganism in Fashion v.1.0 – Jan/2020



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