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1. Kaufland’s DETOX commitment
DETOX is a worldwide Greenpeace campaign seeking to eliminate hazardous chemicals from the manufacturing processes for textiles and footwear for the benefit of mankind and the environment. In December 2015, Kaufland joined the DETOX campaign with a pledge to eliminate environmentally hazardous chemicals from the manufacturing processes for own brands/imports in our apparel, footwear and home textile ranges by 2020. We are therefore demonstrating our commitment to using and producing textiles in an environmentally sound manner, with the emphasis on conserving resources.

Kaufland’s key DETOX aims:

1. **To gradually substitute hazardous chemicals** used in apparel, footwear and home textiles in own brands/imports by 2020. This policy is based on the Kaufland Manufacturing Restricted Substances List (Kaufland MRSL), which applies to Kaufland and its suppliers. The Kaufland MRSL includes the 11 chemical groups to be eliminated from products and production processes and specifies the timescales by which definitive usage bans will come into force.

2. **To design sustainable product ranges for our own brand textiles** by constantly increasing the proportion of environmentally friendly and resource-efficient products (e.g. GOTS certification, recyclable or recycled products). Our target is to increase the proportion of environmentally friendly textile items across our entire textile range (own brands/imports) to at least 25% by the end of 2017.

3. **To introduce a textile take-back scheme** and promote a recycling mentality (circular economy) in the world of textiles to ensure that more and more textiles are reused or, at the very least, recycled efficiently. Our target is to reach 80% of our customers by the end of 2016.

4. **To achieve transparency in the supply chain** and in the use of chemicals, as well as promoting continued consumer awareness and encouraging sustainable use of textiles and footwear.
2. Progress and schedule
2.1 Achievements to date and next steps

**Dec. 2015**
- DETOX commitment signed
- Project planning and organisation
  - Creation of a DETOX team and organisation of external expertise
  - Involvement of relevant specialist departments
  - Action planning and timescales
  - Development of DETOX processes
- Informing the general public

**2016**
- Creation and publication of the Kaufland MRSL (elimination plan)
- Supply chain involvement, transparency and commitment
  - Information events in manufacturing countries covering all affected suppliers
  - All suppliers committed to fulfill the DETOX requirements (incl. Kaufland MRSL); supplier contracts extended accordingly
  - Identification of wet process facilities (processes such as washing, dyeing, printing)
  - Training and chemical management training for suppliers, production and wet process facilities
- DETOX water tests
  - Water tests performed by accredited test institutes in over 80% of wet process facilities in China and results published on the IPE database*
- DETOX product tests
  - 850 product tests carried out as part of quality checks to establish the current situation
- DETOX audits and consulting
  - Initial DETOX audits undertaken in wet process facilities including consulting sessions with external experts
  - Current situation in wet process facilities established and assessed (including chemical inventory); initial improvements introduced/chemicals substituted
- Case studies and chemical bans
  - PFC banned in wet process facilities and products with effect from 31.12.2016
  - Case studies published on substituting AP/APEO** and PFC***
- Information exchange and communication
  - Knowledge sharing with scientists, service providers, suppliers and DETOX stakeholders
  - Notification of consumers and employees, including raising awareness by providing information in our customer brochure, on the internet, in newsletters and via the intranet
- Textile take-back
  - A textile take-back (or recycling) scheme has been introduced in German Kaufland stores; this initiative should reach around 55% of all Kaufland customers, although this has recently been stopped in the short term due to regulatory reasons

**2017 and beyond**
- Further developments
  - Kaufland MRSL updated
  - Water tests extended to other manufacturing countries incl. publication
  - Audits, assessment and advice offered to all wet process facilities including introducing a chemical management system
  - Fine-tuning of a substitution plan with the assistance of external consultants
- Product range configuration
  - Constant increase in the proportion of environmentally friendly and resource-efficient textile items (with a target of 25% by 31.12.2017)
- Promotion of a circular economy
  - Assessment of opportunities to (further) develop the concept of a circular economy
- Transparency and raising awareness
  - Greater transparency/ever-expanding internet presence
  - Ongoing efforts to raise consumer awareness and encourage sustainable consumption

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* IPE: Institute of Public and Environmental Affairs
** AP/APEO: alkylphenols and their ethoxylates
*** PFC: per- and polyfluorinated chemicals
2.2 Wet processes at the heart of the chemical management system

- Upstream suppliers/ upsteam production
- Wet process facilities (e.g. dyeing, printing)
- Final production
- Kaufland product range
### 2.3 Relevant suppliers and wet process facilities

#### Number of suppliers per country

<table>
<thead>
<tr>
<th>Country</th>
<th>Suppliers</th>
</tr>
</thead>
<tbody>
<tr>
<td>China</td>
<td>36</td>
</tr>
<tr>
<td>India</td>
<td>12</td>
</tr>
<tr>
<td>Pakistan</td>
<td>5</td>
</tr>
<tr>
<td>Turkey</td>
<td>8</td>
</tr>
<tr>
<td>Bangladesh</td>
<td>7</td>
</tr>
<tr>
<td>Other</td>
<td>7</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>73</strong></td>
</tr>
</tbody>
</table>

#### Number of wet process facilities per country

<table>
<thead>
<tr>
<th>Country</th>
<th>Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>China</td>
<td>45</td>
</tr>
<tr>
<td>India</td>
<td>11</td>
</tr>
<tr>
<td>Pakistan</td>
<td>2</td>
</tr>
<tr>
<td>Turkey</td>
<td>8</td>
</tr>
<tr>
<td>Bangladesh</td>
<td>5</td>
</tr>
<tr>
<td>Other</td>
<td>2</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>89</strong></td>
</tr>
</tbody>
</table>
3. Eliminating critical chemicals
3.1 Procedure

Supplier information and commitment
1. Information event involving all suppliers
2. Supplier commitment signed
3. Transparency in the supply chain achieved

Training
Training and chemical management training for all suppliers, production and wet process facilities

Water/product tests
1. Water tests carried out in wet process facilities
2. Product tests carried out
3. Test analysis

Audits and consulting of wet process facilities
1. Analysis of the chemical inventory
2. Audits including consulting
3. Introduction of chemical management system and improvements

Further developments
1. Assistance with implementing improvement plans/chemical management system
2. Gradual substitution of critical chemicals (in line with Kaufland MRSL)
3. Re-audits performed
4. Annual water tests
5. Regular product tests and analysis
3.2 Supplier information and commitment

Supplier commitment to meet DETOX targets

- The supplier commitment and necessary documentation is sent out

- The DETOX commitment is signed: suppliers and their production facilities sign mandatory contractual agreements confirming that they comply with the limits

- MRSL: suppliers receive instructions on using the Kaufland MRSL

- Transparency: plants (final production) and wet process facilities must be disclosed to Kaufland
3.3 Training in the supply chain

All suppliers including the relevant plants (final production) and wet process facilities are trained to ensure they comply with the requirements of the DETOX commitment.

Training priorities

- Aims and details of the DETOX commitment
- Chemical management: hazards and risks, procurement/transport/storage/handling of chemicals, explanatory notes on safety data sheets, protective equipment/work clothing, disposal of hazardous chemicals
- Instructions for maintaining chemical inventory lists (CIL)
- Use of the “Chemical Checking Tool” (IT application) to compare existing chemical stocks quickly and easily with the Kaufland MRSL
- Improvement/substitution options

86% achieved
3.4 Water tests in wet process facilities

Process

Accredited test institutes carry out annual checks on wastewater discharges from wet process facilities to verify the limits agreed in the Kaufland MRSL. These test results are uploaded to a public platform (IPE database). The water tests are analysed in preparation for the DETOX audit with a view to introducing targeted improvement/substitution procedures.

Test parameters

- Wastewater: the water sample is currently tested for the 11 priority chemical groups (see Kaufland MRSL)
- Incoming water: if the wastewater sample indicates the presence of chemicals, the incoming water is also tested

Water tests published for 84%* of wet process facilities in China

*due date 01.09.2016
3.4 Water tests in wet process facilities

Results of water tests 2016

Since 2016, water tests have been performed in wet process facilities, focusing on China.

Data based on: **104** water tests in **54** wet process facilities used by our suppliers.

- In the case of AP/APEO it is quite clear that our MRSL limits were observed in 82% of the test results, or these substances were not detected, whereas the limits were exceeded in 18% of cases.

- The substances detected most frequently were heavy metals, chlorobenzenes/chlorinated solvents/chlorophenols/chlorinated paraffins and phthalates. This was often due to the contamination of incoming water (see next page).

- There were virtually no instances in which limit levels of flame retardants or organotin compounds were exceeded or even detected in the tests.
3.4 Water tests in wet process facilities

Results of water tests 2016

Data based on: 104 water tests in 54 wet process facilities used by our suppliers.

Chemical findings/Kaufland MRSL limits exceeded

- Chlorobenzenes/chlorinated solvents/chlorophenols/short chain chlorinated paraffins, phthalates, heavy metals, PFC and AP/APEO were found in both incoming and wastewater, indicating that the water source itself is often contaminated at the outset.

- There was no evidence of organotin compounds, flame retardants or azo dyes in incoming water. This suggests 100% use in the production process.
3.4 Water tests in wet process facilities

Results of water tests 2016

Data based on: 104 water tests in 54 wet process facilities used by our suppliers.

Chemicals found in incoming water
(number of water tests performed in %)

- Limit observed, or not detected: 62%
- Limit exceeded: 38%

Chemicals found in wastewater
(number of water tests performed in %)

- Limit observed, or not detected: 68%
- Limit exceeded: 32%
3.5 Eliminating chemicals such as PFC and AP/APEO

In the initial stages regarding the elimination of the 11 priority chemical groups, the emphasis is on PFC and AP/APEO. Wet process facilities with significant water test results for PFC and AP/APEO are being investigated and advised with priority.

**PFC**

PFC are used to make apparel or footwear water-repellent. Kaufland already used more environmentally friendly alternatives such as bionic finishes in the past, and is now able to remove all PFC from production processes and end products, in line with the ban due to take effect on 31.12.2016. Nevertheless, all wet process facilities are still being tested for PFC via the water tests as these facilities often make products for other companies too. Kaufland ultimately hopes to ensure that PFC are not even used to fulfil production orders for other customers.

**AP/APEO**

AP/APEO are often used for washing purposes, but are due to be replaced in the production process by more environmentally friendly alternatives by 2020 at the latest. The limits shown in Kaufland’s MRSL will be subject to ongoing reductions. Wet process facilities showing significant findings of AP/APEO will be prioritised in the audit planning process to ensure that rapid progress can be made.

**Development of case studies on substituting PFC and AP/APEO**

Case studies on substituting PFC and AP/APEO have been carried out with a view to improving production processes. These are published on www.subsport.org
3.5 Eliminating chemicals such as PFC and AP/APEO

**Chemical findings PFC 2016**
Number of wet process facilities in %

- 86% Limit observed, or not detected
- 14% Limit exceeded

**Target:** zero discharges* by 31.12.2016

**Chemical findings APs/APEO 2016**
Number of wet process facilities in %

- 81% Limit observed, or not detected
- 19% Limit exceeded

**Target:** zero discharges by 2020

*Zero discharges: no hazardous chemicals released into the environment*
3.6 DETOX audits in wet process facilities

Content and schedule

Checkpoints

General
- operating licence
- building safety
- management systems
- welfare standards

DETOX-specific
- environmental assessment/permits
- chemical management
- water treatment/wastewater treatment

Outcome

Green
1 year later

Red
depends on the result*

Date re-audit

Initial DETOX audit

*After successful implementation of the management action plan, but not later than one year
3.6 DETOX audits in wet process facilities

Consulting process as part of the initial and re-audit

Initial DETOX audit by Kaufland auditors and external consultants (scheduled)
Needed documents: current water test results, chemical inventory list, current product test results for end products

DETOKX re-audit (unscheduled)

The DETOKX re-audit takes place without advance warning. Any irregularities observed in the initial audit are reviewed and further advice given to the facility.
3.7 Further development of the chemical management

Positive list for chemicals
We are gradually developing a positive list for substituting hazardous chemicals in the production process with the support of external experts and the chemical industry.

Positive list for wet process facilities
Carrying out water tests and DETOX audits gives us information about which wet process facilities are able to meet the DETOX requirements, those which still have potential for improvement and to identify the scope for further training and advice. Wet process facilities that produce products in accordance with DETOX standards and successfully meet the requirements are identified as “best practice” and are forwarded to our suppliers.

Development of a phase out plan to eliminate the 11 hazardous chemical groups
Suppliers and their production facilities sign mandatory contractual agreements confirming that they comply with the limits set in our Kaufland MRSL. Chemical raw materials, other materials and end products must all comply with the limits. Suppliers and their plants (final production) and wet process facilities receive training, advice and audits to ensure that they comply with the limits. The 11 hazardous chemical groups will be eliminated as part of a phase out plan. The new requirements will be introduced gradually to our suppliers so that the production process can be converted gradually and with our support. We will give suppliers enough time to do this, setting mandatory deadlines for the new limits defined for all specified chemical groups so that use of these chemicals can be reduced gradually. The aim is to eliminate the 11 hazardous chemical groups completely by 2020.
4. Communication
4.1 Information and awareness campaigns

Internal and external communication measures

- Informing employees and getting them involved via in-house training and publishing articles on the intranet
- Raising consumer awareness by publishing articles in our customer brochure and online media (website and newsletters)
4.1 Information and awareness campaigns

Advertising environmentally friendly textiles/footwear

Regular advertising to increase sales and raise awareness
5. Designing sustainable product ranges
5.1 Current situation and outlook

- **Creation/specification** of CSR product standards on designing environmentally friendly and resource-efficient textile and footwear ranges

- **Listings/transition** to more environmentally friendly textiles

Target: 25% environmentally friendly textiles used in own brands/imports (e.g. products with GOTS certification, recycled products, “Made in Green” products) by 31.12.2017. Textiles may only display the GOTS label if they can be shown to have been manufactured in line with environmentally friendly and socially responsible requirements. These include extremely stringent regulations regarding the chemicals used.
6. Textile take-back scheme and the circular economy
6.1 Textile take-back scheme

It is essential that we extend and develop existing textile take-back schemes if we are to have any chance of establishing a circular economy in the textile sector in the long term.

**Target:**

Introduction of a textile take-back scheme in Kaufland stores to reach 80% of all Kaufland customers by the end of 2016.

**Current status:**

- General technical and organisational conditions created.
- The system was initially due to be rolled out in all German Kaufland stores, thus reaching 55% of Kaufland customers worldwide in the first instance.
- Unfortunately, we were unable to meet our target due to requests for clarification from the authorities regarding with product responsibility in textile take-back schemes.
- Rollout has therefore been halted until further notice.

Target not met due to regulatory hurdles
Contact

Kaufland Warenhandel GmbH & Co. KG

E-mail: csr@kaufland.de
Website: www.kaufland.com/detox