

GOODBYE GREENWASHING: ENVISIONING THE
FUTURE OF BRAND SUSTAINABILITY REPORTING IN
THE APPAREL INDUSTRY

by

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Brands' environmental action is becoming more and more important to the average consumer, yet existing brand sustainability reporting does not match this shift in consumer priorities. The intent of this thesis is to address this reality as it relates to the apparel industry. First, by describing the players, reporting styles, and nuances in sustainability reporting. Second, by breaking down the current reality of brand sustainability reporting in the apparel industry. Third, by sharing experiences of industry professionals navigating sustainability across the non-profit sector, advertising and media, business, and the law. This project aims to offer some peace of mind to those who may feel overwhelmed by their sustainability journey as well as to offer some guidance on what the future of accessible brand sustainability reporting could look like.

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Introduction

Sustainability is a growing conversation in the United States with 62 percent of American saying climate change is having at least some effect on their local communities.¹ 67 percent of Americans also say they do not think the federal government is doing enough to reduce the effects of global climate change. With this increasing concern over our environment, more people are beginning to expect companies to take environmental action instead of considering it a nice addition to a business model. The problem as this shift in the consumer mindset occurs, is that current brand sustainability reporting is neither made for consumers nor freely offered in a transparent manner. Businesses have been publishing annual reports to share financial data with their investors for decades, but it has only been in recent years that information on a company's environmental response has been included in such reports. It's this information that consumers should have access to, to make informed decisions on where to spend their money.

With that in mind, the approach I took for this project was to come from the perspective of an average American consumer trying to navigate how to shop for apparel sustainably. My process started with a lot of questions: How does one know whether a brand is taking environmental action to better our planet? Why isn't brand sustainability information made accessible to consumers? Who are the players creating and publishing brand sustainability data? How do you know whether a brand's

¹ Funk, C., & Hefferon, M. (2019, November 25). *U.S. public views on climate and energy*. Pew Research Center Science & Society. <https://www.pewresearch.org/science/2019/11/25/u-s-public-views-on-climate-and-energy/>

sustainability reporting is trustworthy or a marketing ploy? What could the future of accessible, transparent sustainability reporting look like? What I found from my questioning is that the topic of sustainability as it relates to each individual brand is a completely different narrative. Each company reports in different ways, includes or excludes different information, and uses industry jargon that the average consumer likely would not understand. Discovering this lack of standardization made this topic more of a challenge to tackle but one I found even more important because of it. If the task of understanding the apparel industry and subsequent brands' impact on the environment is impossible to understand, how can consumers form an opinion on where to shop sustainably?

Answering this question and going even deeper into why it needs to be asked in the first place is the purpose of this thesis. I've worked to try to understand all the sides of sustainability, who's involved in getting a brand's sustainability report out in the open, who current sustainability reporting is made for, and why consumers *should* feel overwhelmed by the state of brand sustainability reporting today and want to see it change for tomorrow. I hope by breaking down deceptive terminology, the players in the reporting game, and other reasons why today's brand sustainability reporting is so inaccessible, I can not only offer some peace of mind to those who feel overwhelmed by their sustainability journey but also give some guidance on what the future of accessible sustainability reporting could look like.

Hypothesis & Research Questions

The average American consumer does not know the true impact of their clothing consumption on the planet. They also don't have the tools to take the issue seriously or make an educated change. According to a 2020 study from Getty Images that included 10,000 global respondents, 81 percent of people see themselves as eco-friendly yet just 50 percent say they only buy products from brands that try to be eco-friendly. In the UK, 84 percent of respondents say that being environmentally friendly is important to them but only 68 percent could name an environmentally friendly brand.² These statistics begin to explain the current discrepancy between wanting to be sustainable and actively doing it. But consumers are not to blame for this. While people may want to shop sustainably or even think they already have sustainable practices built into their lives, the reality of eco-friendly products today is a confusing scene. No one knows if they're making a positive impact or how to take a legitimate environmental stance with their purchasing decisions. But what we do know is that more people are starting to care about the topic of sustainability and whether things like clothing are made sustainably or not. This is why reporting and access to brands' environmental data is so important.

In summary, my hypothesis is that if comprehensive sustainability reporting becomes a standardized requirement for apparel brands, they'll be forced to keep up with their pledged sustainability goals and take even further steps to protect our environment, while being held accountable by an increasingly larger and more knowledgeable consumer base.

² Fleming, M. (2020, February 26). Consumers don't want to choose between sustainability and convenience. Marketing Week. <https://www.marketingweek.com/brands-sustainability-convenience/>

The questions I plan to tackle with this project are as follows:

1. What about current brand sustainability reporting methods are inaccessible to consumers?
2. Who and what are standing in the way of making brand sustainability information accessible?
3. What are business owners, third-party organizations, non-profits, and media professionals doing to help make brand sustainability reporting that is trustworthy, and accessible to the average consumer?
 - a. What do these groups/people believe needs to happen for apparel brands to take our environment more seriously?
4. What could the future of brand sustainability reporting look like, specifically for consumer use?

With climate conversations front and center in people's minds, now is the time for consumers to put pressure on brands to stop talking about what they *plan to do* and show *what they're doing*. That's information a consumer can and should weaponize to protect our planet and it all starts with accessible reporting.

Background

According to the United Nations' panel of experts on global resources, overconsumption has surpassed overpopulation as the greatest driver of our environmental crisis.³ With a population increase in the United States of 60 percent since 1970, consumer spending is up 400 percent.⁴ This does not bode well for our environment and the apparel industry is largely to blame.

The apparel industry, largely in part due to the rise of fast fashion at the turn of the century, accounts for about eight to ten percent of global carbon emissions and nearly 20 percent of wastewater.⁵ In one year, Americans throw away about 70 pounds of textiles resulting in 34 billion pounds of annual waste, only 5,000 of which is recycled.⁶ With falling costs, streamlined operations, and rising consumer spending, clothing production doubled from 2000 to 2014, and the number of garments purchased per capita increased by about 60 percent. Clothing collections, which used to come out with the year's seasons, now come out 12-24 times each year with store offerings being refreshed weekly. This can be attributed to why we hold onto our clothing about half as long as we did 15 years ago.⁷

3 MacKinnon, J. B. (2021, May 14). Opinion: We're ready to spend again. But there are profound costs to consumption. *The Globe and Mail*. <https://www.theglobeandmail.com/opinion/article-were-ready-to-spend-again-but-there-are-profound-costs-to-consumption/>

4 Waters, J. (2021, May 30). Overconsumption and the environment: should we all stop shopping? *The Guardian*. <https://www.theguardian.com/lifeandstyle/2021/may/30/should-we-all-stop-shopping-how-to-end-overconsumption#:~:text=We%20are%20devouring%20the%20planet>

5 Ro, C. (2020, March 11). Can fashion ever be sustainable? *BBC*. <https://www.bbc.com/future/article/20200310-sustainable-fashion-how-to-buy-clothes-good-for-the-climate>

6 Noyes, L. (2021, September 23). Fast Fashion 101: Everything You Need to Know. *EcoWatch*. <https://www.ecowatch.com/fast-fashion-guide-2655084121.html#toggle-gdpr>

7 Remy, N., Speelman, E., & Swartz, S. (2016, October 20). Style that's sustainable: A new fast-fashion formula. *McKinsey & Company*. <https://www.mckinsey.com/business-functions/sustainability/our-insights/style-thats-sustainable-a-new-fast-fashion-formula>

We live in a culture fueled by consumerism, but this is not a sustainable way to live. Change must be made and that starts with making the true impact of the apparel industry on the environment known to consumers and holding brands accountable for the waste they produce from their overproduction.

Greenhouse gas emissions are no easy thing to track, so it's not a shock that brands' environmental impact can be so hard to decipher. According to the Greenhouse Gas Protocol, emissions are broken into three categories: Scope 1, Scope 2 and Scope 3.⁸ Scope 1 emissions are produced directly by a business's operations. Scope 2 emissions include emissions from purchased energy like heating and electricity to run machinery. Scope 3 emissions are not directly controlled by the retailer but include the emissions from suppliers, transportation of products and materials, the use of sold products, business travel and more.⁹ Scope 3 emissions are also by far the hardest to track and can make up as much as 98 percent of fashion retailers' total carbon footprint (8). The challenge of tracking emissions, among other things under the environmental umbrella to be weary of, make building a comprehensive and representative sustainability report no easy task. From waste, to emissions, to the afterlife of a product, some structure must be made to keep tabs on a company's environmental impact if we're to become aware of the true impact of our clothing consumption.

Ultimately, the most sustainable thing we as consumers can do is to consume less. Overconsumption is the driver of climate change, but slowing our consumption is a

⁸ Bhargava, A., Hoffman, S., & Jakic, N. (2022). *Climate sustainability in retail: Who will pay?* McKinsey & Company.

⁹ Ferrera, G. R., Alexander, M. M., Wiggins, W. P., Kirschner, C., & Darrow, J. J. (2022a). *Scope 1 and Scope 2 Inventory Guidance*. Wolters Kluwer Law & Business.

challenging thing to tackle all at once. That's why this project focuses instead on the results of our overconsumption and how to access the information that shows what little progress brands are making to take climate change seriously.

Breaking Down Terminology

The language we choose to use is closely tied to the audiences we want to read and understand it. You can write something simply so it's accessible to a wide variety of people or you can write something full of industry specific terms that force wider audiences away and focus on one specific target group. Current sustainability reporting in the apparel industry goes in both directions and neither are entirely successful. Companies' annual reports are made for investors and company stakeholders, so they span hundreds of pages, cover a wide variety of topics, and use language intended for those specific audience. As brand sustainability becomes more important to consumers, companies are beginning to share a fraction of their annual reporting data with their consumers. But since they have to cut industry jargon to be more accessible, they switch to greenwashing.

The first step to understanding a brand's environmental response is to be aware of the language they use to share this information. This starts by breaking down industry jargon and greenwashing. Jargon can be defined as "special words and phrases that are used by particular groups of people, especially in their work."¹⁰ The term greenwashing was invented in 1986 by environmentalist Jay Westerveld and is defined as "behavior or activities that make people believe that a company is doing more to protect the environment than it really is."¹¹ Apparel brands employ greenwashing in their advertising to convince consumers they care about the environment and are

10 Cambridge Dictionary. "JARGON | Definition in the Cambridge English Dictionary." Dictionary.cambridge.org, dictionary.cambridge.org/us/dictionary/english/jargon.

11 Cambridge Dictionary. "GREENWASHING | Definition in the Cambridge English Dictionary." Cambridge.org, 2019, dictionary.cambridge.org/us/dictionary/english/greenwashing.

making actionable changes to protect it with their products. The use of greenwashing in the apparel industry leads consumers to not know what's sustainable or what's not. This makes it incredibly hard for the consumer to take a stance and choose to shop sustainably. Some examples of greenwashing terms include recyclable, cyclical fashion, carbon-neutral, eco-friendly, and non-toxic. By using these terms, brands seem to be implying they're making a positive impact on our environment. But the reality is the use of these terms is not regulated. For example, the United States Environmental Protection Agency (EPA) regulates the production, use, distribution, and disposal of toxic chemicals in the US but does not regulate companies' use of the term "non-toxic." Anyone can print a label with that statement, but there's no regulation in place that defines what it means. This is an example of greenwashing. Greenwashing has become a huge problem as the need for environmental change reaches a cataclysmic peak. Brands are not held accountable for the language they use, so consumers have no way to navigate the apparel industry from a sustainability perspective.

The definition of sustainability, as it relates to our environment is, "the quality of causing little or no damage to the environment and therefore able to continue for a long time."¹² When something like a piece of clothing is "sustainably made," it implies the item was created with its environmental impact and lifespan in mind. However, this term is also not regulated and could refer to an overwhelmingly long list of things involved in a product's creation. Sustainability relates to what kind of materials are used, where they came from, and how much water a product needs to be produced. It

¹² Cambridge Dictionary. "SUSTAINABILITY | Definition in the Cambridge English Dictionary." Cambridge.org, 2019, dictionary.cambridge.org/us/dictionary/english/sustainability.

includes the dyes used to color the item and where the toxic waste from those dyes ends up. It includes the workers along the item's supply chain and whether they're properly cared for and paid. The sustainability of an item also includes how it got into your hands in the first place. Where did all the pieces of your shirt travel from? How and where did they meet to be assembled? How many trains, boats, or planes were employed to get that final product beneath your fingers at the department store or on your doorstep, wrapped in plastic with a return shipping label tucked beside it? There are so many layers to sustainability when it comes to our clothing, which is what makes access to digestible information on apparel brands' climate impact so important.

In essence, asking whether a product is sustainable or not is questioning whether its production can be repeated without an overwhelming drain on our resources. One branch of the apparel industry that disembodies sustainability is fast fashion.

But what is fast fashion? Fast fashion is “an approach to the design, creation, and marketing of clothing fashions that emphasizes making fashion trends quickly and cheaply available to consumers.”¹³ The goal of fast fashion brands is to mass-produce runway styles and get them into the hands of shoppers as quickly as possible no matter the quality or external costs. Fast fashion brands typically use cheap, often unethical labor and with such high levels of production, their supply chains are not sustainable. Fast fashion continues to grow as our society falls victim to a culture that jumps from trend to trend, daily. We're told to never wear an outfit twice, to always hit the big sales, and that we must have what's popular at the moment, even if that moment

13 Merriam-Webster. (n.d.). Fast fashion. In Merriam-Webster.com dictionary. Retrieved February 3, 2022, from <https://www.merriam-webster.com/dictionary/fast%20fashion>

is fleeting. The creation and growth of fast fashion brands is largely to blame for the apparel industry's strain on our earth's resources and our growing consumerist tendencies. Ultimately, it's these industry behemoths that must be held accountable for their waste and to share with the world what impact they're making on our environment. The results will be frightening.

Navigating a reporting landscape full of industry jargon and greenwashing is no easy task. Both complex terms and overly simplified language can be used to hide ugly truths which I will demonstrate in the upcoming brand analysis. As consumers in today's reporting landscape, we must read brand sustainability information with caution. And in the future, advocate for standardized reporting that accurately and succinctly shares brands' environmental data to better guide our shopping decisions.

Existing Brand Reporting Methods

The problematic reality of sustainability reporting today is the lack of standardization and access for consumers. There is a plethora of reporting methods currently in use, all of which use varying frameworks and primarily target investors. With no standardized methodology, businesses can choose to report on or withhold any information they want. This is what makes accessing and understanding sustainability data so challenging. And why it's so hard to make educated purchasing decisions as consumers. Some common reporting frameworks that businesses have been using for decades to communicate with their investors include the Corporate Social Responsibility (CSR) report and the Environmental, Social, and Governance (ESG) report.

A CSR report is an internal and external-facing document used to communicate a business's impact on the environment and community.¹⁴ Information in a CSR report typically falls into four categories: environmental, ethical, philanthropic, and economic. CSR reports are typically over 100 pages long and by no means written in layman's terms. In some countries, it's mandatory for businesses to publish CSR reports annually but this is not the case in the United States. There is also no standardized reporting style that a CSR report must follow. Businesses have the freedom to employ any format they choose and highlight whatever information they want. This also allows them to leave out whatever information they want. With no standardized format, it's challenging to

¹⁴ Cote, Catherine. "What Is a CSR Report & Why Is It Important?" Business Insights - Blog, 20 Apr. 2021, [online.hbs.edu/blog/post/what-is-a-csr-report#:~:text=A%20corporate%20social%20responsibility%20\(CSR](https://online.hbs.edu/blog/post/what-is-a-csr-report#:~:text=A%20corporate%20social%20responsibility%20(CSR).

compare CSR reports across companies as they can range from straightforward text documents to design-driven information packets in a wide range of lengths.

An ESG report is another non-standardized reporting method that companies can use to disclose information on their environmental, social, and corporate governance.¹⁵ ESG reporting is primarily used by investors to decide if a business is worth investing in based on their performance in these three areas.

While CSR and ESG reports are typically produced by brands themselves, there are several reporting methods and tools that companies use to outsource and legitimize their reports. Some of these include the Dow Jones Sustainability Indices, the Carbon Disclosure Project (CDP), the Sustainability Consortium (TSC), the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), the Environmental Profit and Loss (EP&L), and the Sustainable Apparel Coalition (SAC). All of these help companies report their sustainability initiatives for various audiences and with different environmental expectations, metrics, and ranking systems. With so many reporting methods and no standardization throughout them, it's difficult to understand how brands stack up when it comes to their sustainability initiatives. To help understand the wide variety of environmental reporting tools in use today, I've broken down each platform including their goal, who they target, and what they report on.

To start, the Carbon Disclosure Project, shortened to the CDP is a not-for-profit charity that scores companies and cities on their environmental impacts to “incentivize and guide them on a journey through disclosure towards becoming a leader on

¹⁵ Sphera. “What Is ESG Reporting, and Why Is It Important?” Sphera, 12 Apr. 2021, [sphera.com/glossary/what-is-esg-reporting-and-why-is-it-important/](https://www.sphera.com/glossary/what-is-esg-reporting-and-why-is-it-important/).

environmental transparency and action.”¹⁶ The CDP scores businesses’ environmental performance from their reporting questionnaire responses with a letter grading system from A to D-. Different scores are provided for climate change, water, and forests. Over 680 investors with over 130 trillion dollars in assets request the companies they invest in disclose their environmental data through the CDP.¹⁷

The Dow Jones Sustainability Indices are also primarily for investor use. Companies included within the DJSI represent the top 10% of the 2,500 largest companies within the S&P Global Broad Market Index. The Corporate Sustainability Assessment (CSA), which companies fill out to be considered, includes industry-specific criteria including economic, social, and governmental (ESG) information. The CSA aims to evaluate transparent communication of corporate sustainability strategies and the extent to which stated targets have been met, among other things.¹⁸ S&P Global ESG Research has separate CSA questionnaires for 61 industries with general and industry specific questions. With up to 120 questions, S&P Global ESG Research uses an evidence-based performance assessment for each ESG subject to score companies’ performance. Businesses receive a Sustainability Score between 0-100 and are ranked against each other. Only the companies that score within the top 10% are included in the index. The CSA questionnaire can be filled out by companies free of charge. The main constraint of the Dow Jones Sustainability Indices is its exclusivity. Only the top ranked companies within each industry are chosen to be included in the DJSI family.

16 “Scores - CDP.” Cdp.net, 2018, Error! Hyperlink reference not valid..

17 CDP. “What We Do.” Cdp.net, 2019, www.cdp.net/en/info/about-us/what-we-do.

18 S&P Global. Frequently Asked Questions S&P DJI ESG Scores.

SASB is a nonprofit organization founded in 2011 “to help businesses and investors develop a common language about the financial impacts of sustainability.”¹⁹ The SASB Standards identify ESG issues most relevant to financial performance across 77 industries for companies to disclose to their investors.

The GRI is an international, independent organization that “helps businesses and other organizations take responsibility for their impacts by providing them with the global common language to communicate those impacts.”²⁰ The GRI Standards are a modular system made up of three series of standards: Universal Standards, Sector Standards, and Topic Standards. Businesses can use the Standards to prepare sustainability reports in accordance with the GRI Standards or use parts of Standards to report to investors or consumers on specific information like climate change impacts or child labor.

The Sustainability Consortium is a global non-profit organization working to make consumer products more sustainable by helping businesses create transparent supply chains. By becoming a member, TSC helps businesses measure their progress against their sustainability commitments, benchmark their products’ sustainability against similar products, and adopt quantitative sustainability metrics that align with the business’s other reporting initiatives.²¹ Membership costs anywhere from \$100,000 to \$25,000 depending on the size and type of organization.

Luxury goods corporation, Kering developed a tool to measure and quantify its’ brands’ environmental impact, called the Environmental Profit & Loss (EP&L). Kering

19 SASB. “About Us.” SASB, www.sasb.org/about/.

20 GRI. “About GRI.” www.globalreporting.org, 2022, www.globalreporting.org/about-gri/.

21 Our Story | The Sustainability Consortium. sustainabilityconsortium.org/our-story/. Accessed 28 Apr. 2022.

has made the tool accessible to the rest of the luxury sector and any other company that may find the tool useful. The EP&L measures carbon emissions, water consumption, air and water pollution, land use, and waste production across entire supply chains.²² These findings are then converted into monetary values to help companies manage and alter their use of natural resources. The EP&L is an internal tool valuable only to brands' teams and investors.

Lastly, the Sustainable Apparel Coalition. The SAC is made up of over 250 apparel, footwear and textile brands, including Arc'teryx, Carhartt, and Gap Inc. Retailers, suppliers, non-profits, NGOs, service providers, trade associations, and academic institutions are also included, "working to reduce environmental impact and promote social justice throughout the global value chain."²³ The SAC is part of a collaboration with Higg Co and the Apparel Impact Institute working to improve social and environmental sustainability within the apparel industry. Together they created the Higg Index, a suite of tools "for the standardized measurement of value chain sustainability (22)." The tools help improve a product's life cycle and identify opportunities for sustainability improvements in facilities and company operations. These tools are used by sustainability analysts, material and product developers, manufacturers, brands, and retailers.

The seven organizations described above all offer different tools to help businesses communicate their environmental action with their stakeholders, investors, and the occasional curious consumer who's willing to do some digging to source the

²² *EP&L: a measurement tool for sustainable Luxury.* (n.d.). Kering: French Luxury Group | Kering. Retrieved May 8, 2022, from <https://www.kering.com/en/sustainability/measuring-our-impact/our-ep-l/>
²³ Sustainable Apparel Coalition. Our Vision. apparelcoalition.org/the-sac/.

hard data. But, generally speaking, these reports and tools are not intended for consumer use. They're meant to convince businesses that implementing sustainable practices is worthwhile, something the consumer already believes. In 2020, nearly eight in ten consumers indicated sustainability was important to them and six in ten said they'd be willing to change their shopping habits to reduce their environmental impact.²⁴ The time is quickly approaching for apparel brands to either start seeing the value and importance of taking our environment seriously or lose their customer loyalty.

The question I hope this analysis of existing reporting tools sparks is in what format and setting consumers should access this information in the future? No brand expects or wants their consumer base to sift through their CSR report to decide whether to shop with them, so what alternatives are they offering? Not any impressive ones. Brands often have a page on their main website titled "Social Responsibility," "Sustainability," or a similar term that offers a brief synopsis of how and why they care about the environment. In the following section, I conduct a study to detail the consumer experience trying to source brand sustainability information in today's landscape. But before that, I'd like to offer four non-brand affiliated ways consumers can access brand sustainability information in a format built for them. Though a great source of digestible data for consumer use, it's important to note that these sources are also not standardized in any way. They exist to help consumers be more conscious in their buying habits but again use their own metrics to determine "sustainable" versus "not sustainable."

24 Haller, K., Lee, J., & Cheung, J. (2020). *Meet the 2020 consumers driving change*. IBM. <https://www.ibm.com/downloads/cas/EXK4XKX8>

The first is Good On You, a sustainability rating system that compares brands' impacts on people, the planet, and animals.²⁵ In describing its process, Good On You says, "we bring together the world's leading and most reliable sources of information on sustainability and present it in clear and accessible ratings anyone can comprehend (25)." Good On You rating analysts employ the Fashion Transparency Index, CDP, numerous environmental certifications, and brands' own public reporting to compile its ratings. The rating system is on a five-point scale from "Great" to "We Avoid." Good On You also publishes a blog to discuss recently rated brands, share shopping top picks, and discuss current fashion trends in relation to sustainability. As part of its commitment to transparency, Good On You states that it may make a commission if visitors go shop with a brand linked on their site. The Good On You team sources brands to rate, but brands and retailers can also request to be ranked with a form on the site.

Remake is a non-profit organization educating citizens, legislators and brands through articles, brand accountability reports, education programs, and social media.²⁶ Through Remake's accountability report, brands can earn up to 150 points across six sections: traceability, wages and wellbeing, commercial practices, raw materials, environmental justice, and governance. Remake bases its findings on publicly available brand disclosures, NGO findings, media reports, and independent research. Each company is sent its report prior to publication on Remake's site as an opportunity to fill in any gaps or make additional information available to the public.

25 Good On You. "How We Rate Fashion Brands." Good on You, 2019, goodonyou.eco/how-we-rate/.

26 "About Us." Remake, remake.world/about-us/.

Lastly, in the category of brand environmental rating tools for consumers, is the Fashion Transparency Index, a subset of the non-profit social enterprise, Fashion Revolution. Fashion Revolution was founded after the 2013 Rana Plaza disaster in Bangladesh. It now identifies as the world's largest fashion activism movement "mobilizing citizens, brands, and policymakers through research, education and advocacy."²⁷ The Fashion Transparency Index is released annually, and in 2021 it rated 250 of the world's largest apparel brands on how transparently they disclose their social and environmental policies, practices, impacts, operations and supply chains. The tool reviews brands' public disclosure on human rights and environmental issues across 239 indicators and five key areas. Some of the areas include policies and commitments, governance, supply chain traceability, etc. With this tool, Fashion Revolution hopes to incentivize the world's largest apparel brands to increase the transparency in their reporting by publicizing how much improvement brands need to make.

The annual Fashion Transparency Index, Good On You and Remake can all be used as sustainability search engines for consumers. Shoppers can go to these sites, search the brand they're interested in, and have all of that company's sustainability information broken down for them on one easy to access page. Though all three use their own rating system, researchers and analysts from these organizations dive deep into brand disclosure reports and share the facts they believe consumers should know.

For the consumers that don't want to investigate brand reports and just want to go shopping, there's an option for that too. [Renoon](#) is a shopping app that curates

²⁷ *ABOUT - Fashion Revolution*. (n.d.). Fashion Revolution. Retrieved May 5, 2022, from <https://www.fashionrevolution.org/about/>

sustainable clothing options from numerous sites all on one platform. Renoon's technology extracts and processes information related to a product's sustainability and adds it to the app's database if it meets Renoon's sustainability criteria.²⁸ The app's technology analyzes materials, composition, certifications, and production processes at the product level. By looking at a product's sustainability as opposed to the brand, Renoon hosts only the most responsible offerings of a brand. It also shows used, made to order, rentals, and other buying options on the market. On the app, users select the sustainable practices that are most important to them, and Renoon filters through the thousands of products to show items that employ that practice. An example of a criterion is saving water. When selecting a product, Renoon breaks down why it meets each criterion in a brief paragraph. This app is a great way for consumers to continue shopping, feel good about what they're buying, and see what sustainable practices in the apparel industry can look like.

In summary, in today's sustainability reporting landscape, consumers cannot expect to find accessible environmental information made for them from brands themselves. They must go to non-profits or other organizations that exist to break down that information for them. The reporting methods that brands' currently employ to track their environmental action or inaction are for their investors to track growth. It's also possible they utilize a third-party organization to legitimize their environmental claims, but these reports are also not meant for consumers.

²⁸ *About Renoon*. (n.d.). Renoon: Find Sustainable Fashion. Retrieved June 2, 2022, from <https://renoon.com/about-us>

Brands have not yet devised a successful method to disclose their sustainability data to consumers because we're just now experiencing a turn in consumer culture where more buyers expect it. In a 2021 survey of global *Vogue* subscribers, Condé Nast found that the number of subscribers that said sustainability was an important factor in making a fashion purchase jumped from 65 percent in October 2020 to 69 percent in May 2021.²⁹ Respondents also said that they would rather the brands they shop with now become more sustainable than change to alternative sustainable options. This insight shows apparel brands that their buyers would like to stick with them if they start taking environmental action. What better way to show what action you're taking as a brand or retailer than making your sustainability initiatives transparent and accessible to your buyers?

²⁹ Cernansky, R. (2021, August 5). *Customers care more about sustainability post-lockdowns. Now what?* | *Vogue Business*. Vogue Business; Vogue Business.
<https://www.voguebusiness.com/sustainability/customers-care-more-about-sustainability-post-lockdowns-now-what>

Brand Sustainability Reporting Study

Currently, apparel brands offer two sources of sustainability information, the long form CSR and ESG reports for investors and the front facing webpage for consumers. The difference between the two? One includes real, longform data and the other uses non-specific language and greenwashing terms to put up an environmentally friendly front. To prove this, I've conducted a brand analysis of five apparel brands to show what accessing brand sustainability reporting as a consumer looks like today.

For my brand analysis, I broke apparel brands into four categories: fast fashion, sports brands, brands marketed as sustainable, and luxury. I chose one brand to represent each category, with one outlier, Stella McCartney, which fits into both marketed as sustainable and luxury. The brands I'll analyze include SHEIN, representing the fast fashion sector, Nike for sportswear, Reformation as a brand marketed as sustainable, Burberry to represent luxury, and Stella McCartney. The purpose of this analysis is to simulate the experience an average consumer might go through to source a brand's sustainability information. By putting myself into the perspective of the consumer, I will try to access each brand's sustainability information as if I were trying to decide whether I should shop there based on their environmental response.

SHEIN

SHEIN has a few sources of sustainability information that can be accessed through different searching methods. The first can be found by typing "Shein sustainability report" into a search engine. The first link that pops up reads "CSR – Shein." From there, users are directed to a webpage on SHEIN's US website that is very

short and includes only a few of the common sections found on a CSR report. The webpage has three sections, and each section is under 35 words. Viewers can click on the “Our community” or “Our products/Our planet” sections to learn more about SHEIN’s business of ‘doing good’ as it states at the top of the page. Lots of imagery is used to create a friendly atmosphere. SHEIN also uses bolding to alert readers of statements that make it look especially environmentally conscious.



Figure 1: An Example of SHEIN’s Bolding Technique

On SHEIN’s Social Responsibility page, the company utilizes a bolding technique to draw readers attention to specific statements that make it look good. This is a deceptive strategy as no context for these bolded words is given to put it into perspective or validate it as genuinely sustainable.

On its community page, bolding is used 16 times in a section with only six sentences. The planet page states that SHEIN only produces 50-100 pieces per new product, but what it doesn’t include is that SHEIN adds up to 6,000 new items to its website daily.³⁰

The other method to find SHEIN’s sustainability information is by starting at its current US website, <https://us.shein.com/>. From the main page, users can scroll to the

³⁰ Jones, L. (2021, November 9). *Shein: The secretive Chinese brand dressing Gen Z - BBC News*. BBC News; BBC News. <https://www.bbc.com/news/business-59163278>

site’s footer and click on the section titled “Social Responsibility.” This takes users to an entirely different webpage that lists the brand’s community service projects and references the United Nations Sustainable Development Goals as a framework for its social and environmental impact strategies. From this page, users can also click on a hyperlink to view SHEIN’s [2021 Sustainability and Social Impact Report](#). This 28-page CSR report uses a standard structure, starting with a letter from the CEO, information for stakeholders, and then sections on people, protecting the planet, and supporting communities. The protecting the planet section only spans four pages and includes no hard data. It repeatedly states that SHEIN is “developing innovative solutions” or “establishing goals” but no action or plan is yet clear. SHEIN also continues to use its bolding technique to point out information it wants consumers to view as the brand making a positive impact. The report concludes with a Q&A with Adam Whinston, SHEIN’s Global Head of Environmental, Social and Governance (ESG). He answers questions about how SHEIN will distinguish itself from other fast fashion brands in the ESG space, why stakeholders should trust SHEIN is coming from a genuine place with its environmental claims, and what SHEIN’s next steps might be on its sustainability journey. Whinston states SHEIN’s “commitment to sustainability and social impact will be proven through actions, not statements.”³¹ As the first publicly published CSR report from the brand, there is hope for this claim, but SHEIN has a long way to go.

In summary, from these two ways to access SHEIN’s sustainability pledges and progress, consumers are unable to gather a clear picture of SHEIN’s environmental

31 SHEIN. “2021 Sustainability and Social Impact Report | SHEIN USA.” Us.shein.com, 2021, us.shein.com/2021-Sustainability-and-Social-Impact-Report-a-1218.html. Accessed 25 Apr. 2022.

impact. The language used may be simple and accessible but SHEIN’s statements are too short and baseless to hold any value. Without any hard data and with the overall size of the company, it’s impossible to consider SHEIN sustainable.

“Is SHEIN sustainable”	“SHEIN sustainability report”	“SHEIN eco-friendly”
How ethical is SHEIN? - Good On You - 2021	CSR - Shein	How ethical is SHEIN? - Good On You - 2021
Is SHEIN Ethical and Sustainable? - Wear Next. - 2021	SHEIN - Sustainability Rating - Good On You Directory	Shein Child Labor, Sustainability, and More - Brightly.eco - 2021
Shein Child Labor, Sustainability, and More - Brightly.eco - 2021	SHEIN Scores Zero Points In Our Sustainability Assessment	Is Shein an Ethical Brand? A Look Into the Fast Fashion Empire - 2021
Is Shein an Ethical Brand? A Look Into the Fast Fashion Empire - 2021	Shein Child Labor, Sustainability, and More - Brightly.eco - 2021	Is SHEIN Ethical and Sustainable? - Wear Next. - 2021
Is SHEIN Ethical? Deep Dive Into Their Greenwashing - 2021	Is SHEIN Ethical? Deep Dive Into Their Greenwashing - 2021	How are Shein hauls making our planet unlivable? Euronews - 2021

Table 1: Google Search Terms – What pops up when searching SHEIN’s sustainability information?

In simulating the consumer’s journey to source SHEIN’s sustainability information, this table represents Google search terms and responding links to access brand sustainability information in various formats.

Nike

Nike has three sources of environmental information. One can be found directly on the footer at [Nike.com](https://www.nike.com) under “Sustainability.” This takes viewers to a fully fleshed out website with its own color palette and illustrations, and with hyperlinks to four sustainability sections: [Materials](#), [Climate x Sport](#), [Circularity](#), and [Nike Refurbished](#). At the top of the page the company uses the title “MOVE TO ZERO” to represent its sustainability initiative. This initiative is explained in the following paragraph,

MOVE TO ZERO IS NIKE’S JOURNEY TOWARD ZERO CARBON AND ZERO WASTE TO HELP PROTECT THE FUTURE OF SPORT. FOLLOW EACH STEP IN OUR JOURNEY AND DISCOVER NEW WAYS WE CAN MOVE TO ZERO TOGETHER.³²

This webpage is very stylized with design assets created specifically for the MOVE TO ZERO project. A new logo was even made for the campaign.



Figure 2: Nike’s MOVE TO ZERO logo

On Nike’s sustainability webpage, the MOVE TO ZERO campaign is described with contributing design assets including this logo. The webpage states, “When you see this logo, you see one small step in our journey to Move to Zero.”

Nike also uses all capitalization to summarize each section. The use of capitalization is similar to SHEIN’s bolding in that it garners attention for being big,

³² *Nike Sustainability. Move to Zero.* . (n.d.). Nike. Retrieved May 6, 2022, from <https://www.nike.com/sustainability>

bold, and implying strength. Many photos are used on the page, along with links to shop sustainable products and to environmentally related blog posts.



Reuse-A-Shoe

Help reduce waste by cleaning and donating or recycling worn athletic shoes and apparel.

[Learn More](#)

Refurbished

We source a mix of eligible returns and open box footwear to create an opportunity to purchase gently used shoes at a lower price.

[Learn More](#)

Figure 3: An Example of the Stylistic Choices Used in Nike’s Move To Zero Campaign

The Move To Zero Campaign utilizes imagery and illustration to make the environmental initiatives Nike is implementing look more official.

In summary, the Sustainability page has a lot going on which may feel overwhelming for a consumer, but the unique style guide and number of sections could also be perceived as Nike taking the climate issue seriously. However, it’s dangerous to make assumptions purely on looks.

Moving away from the main page, the intro to the [Nike Refurbished page](#) reads as follows,

NIKE REFURBISHED EXTENDS THE LIFE OF ELIGIBLE PRODUCTS BY TAKING LIKE-NEW, GENTLY WORN, AND SLIGHTLY IMPERFECT KICKS, REFURBISHING THEM BY HAND, AND OFFERING THEM TO YOU AT SELECT NIKE FACTORY, NIKE UNITE, AND NIKE COMMUNITY STORES.

From this description, this program seems to suggest Nike accepts gently worn shoes back from buyers, cleans them up, and resells them, however this is not the case. If you scroll down the page to the FAQ section, you will find that you cannot bring Nike shoes into Nikes stores to be refurbished. Instead, Nike encourages you to “donate or responsibly recycle footwear at the end of your use.” The shoes Nike refurbishes are returns, exchanges, or shoes with small imperfections.

[The Climate x Sport page](#) details climate research Nike has conducted and ties it to quotes from top athletes and their opinions on the importance of combatting climate change to succeed in their sport. With this section, Nike uses celebrity athletes to show how committed it is to the environmental cause which can distract consumers from looking deeper into the work Nike is doing.

[The Circularity page](#) is quite long offering a downloadable workbook and mini guide that “support a universal call to action for our industry.” This page seems to be a resource for other apparel or sportswear brands, whereas the pages before seemed to be targeting consumers. Further down the Circularity page are examples and explanations of improved design concepts from material choice to cyclability, waste avoidance, disassembly, green chemistry, refurbishment, versatility, durability, circular packaging and new models. Each page offers “thought starters” which are questions to ask within the category or field as well as an inspiration and case studies sections. Once again, all of this content sounds promising, but there are no examples of Nike implementing these practices and strategies across its own products. Nike has published an industry

resource with guiding questions for what companies should do but isn't showing many examples of its own progress.

Nike's other source of sustainability information is a separate website, purpose.nike.com. When users type "Nike sustainability report" in a Google search, this is the first source that comes up. On this website, you can read and watch a message from Nike's President and CEO, access Nike's 2021 Impact Report, look through its 2025 Targets, and the brands approach to Diversity, Equity, and Inclusion (DEI). Only the impact report and 2025 targets address the environment. Nike breaks its "Planet work" into four categories: carbon, waste, water, and chemistry. At the bottom of the 2025 Targets page, you can see Nike's goals for each of these sections which include a 70 percent "absolute reduction of greenhouse gas emissions in owned or operated facilities, through 100 percent renewable electricity and fleet electrification."³³ Nike is clear to preface this goal by stating this reduction in GHG emissions only extends to owned or operated facilities and does not tell readers how many other facilities are a part of their supply chain. Another 2025 goal is to reduce GHG emissions by 0.5 million tons by "increasing our use of environmentally preferred materials to 50 percent of all key materials" (33) which include polyester, cotton, leather, and rubber. While the over production and overuse of any material is bad for the environment, polyester is a manufactured synthetic fiber made from petroleum which makes it especially bad.³⁴ Polyester is the most widely used fiber in the world (34) and greatly contributes to our microplastic problem. With every wash, our clothes shed approximately 700,000

³³ *2025 Targets*. (n.d.). Nike Purpose. Retrieved May 6, 2022, from <https://purpose.nike.com/2025-targets>

³⁴ *POLYESTER*. (n.d.). CFDA. Retrieved May 7, 2022, from <https://cfda.com/resources/materials/detail/polyester#:~:text=Polyester%20is%20a%20manufactured%20synthetic,agricultural%20crops%2C%20or%20even%20waste.>

microplastic fibers which end up in our water and natural landscape.³⁵ With this information, knowing polyester is one of Nike's key materials should be a red flag for consumers even if some of it is recycled.

Under the waste category, Nike hopes 100 percent of its waste will be diverted from landfills in its extended supply chain with "at least 80 percent recycled back into NIKE products and other goods." It is unclear what will happen to the other 20 percent of diverted waste.

Looking at this site as a whole, Nike's sustainability goals are made fully accessible to the consumer. This is great news, but the problem with massive apparel giants like Nike is that the core of their problems continues to be overproduction and waste. Nike can improve the cyclicity of its products, but waste will continue being produced in the manufacturing process and synthetic fibers will continue to pollute our environment no matter how many times you recycle them. It's important for brands to share their goals and progress working through those goals, but consumers also need to know the reality of brands' production rates. A Nike Air Max shoe made of 50 percent recycled manufacturing waste means nothing if that shoe is never sold and ends up in a landfill or broken down into parts again to make another shoe that may never be sold. Consumers need to see the scale of these brands' production processes and that's the information that seems to be missing from Nike's Purpose website and MOVE TO ZERO campaign.

³⁵ Napper, I., & Thompson, R. (n.d.). *Release of synthetic microplastic plastic fibres from domestic washing machines: Effects of fabric type and washing conditions* - ScienceDirect. ScienceDirect.Com | Science, Health and Medical Journals, Full Text Articles and Books. Retrieved May 7, 2022, from <https://www.sciencedirect.com/science/article/pii/S0025326X16307639?via%3Dihub>

The final way to access Nike’s sustainability information is by reading the brand’s Impact Report. This report can be found on Nike’s [Purpose website](#). This document is highly branded to fit Nike’s style guide, but it’s formatted like a standard Corporate Social Responsibility Report. It spans 184 pages and is written in accordance with the Global Reporting Initiative (GRI) Standards. This is where all of Nike’s long form data can be found. There are comparisons of renewable energy use from year to year detailing the company’s progress, a breakdown of scope one, two, and three emissions, and many disclosures on how Nike compiles this data. In a section titled “Uncertainty,” the brand explains the margin for error in calculating GHG emissions.

GHG emissions quantification is subject to significant inherent measurement uncertainty because of such things as GHG emissions factors that are used in mathematical models to calculate GHG emissions and the inability of these models, due to incomplete scientific knowledge and other factors, to accurately measure under all circumstances the relationship between various inputs and the resultant GHG emissions. Environmental and energy use data used in GHG emissions calculations are subject to inherent limitations, given the nature and the methods used for measuring such data. The selection by management of different but acceptable measurement techniques could have resulted in materially different amounts or metrics being reported.

The preparation of the other sustainability metrics requires management to establish the criteria, make determinations as to the relevancy of information to be included, and make assumptions that affect reported information. The selection by management of different but acceptable measurement techniques could have resulted in materially different amounts or metrics being reported.

NIKE recognizes that commercial air travel and logistics remain an estimate since unforeseen circumstances can occur (e.g., different routes due to adverse weather or unforeseen aircraft fleet changes), however the figures presented are considered to be a reasonable estimate of NIKE’s commercial air travel and logistics emissions.³⁶

³⁶ *Breaking Barriers: FY21 NIKE, Inc. Impact Report*. (2022). Nike. https://purpose-cms-preprod01.s3.amazonaws.com/wp-content/uploads/2022/03/17210319/FY21_NIKE-Impact-Report.pdf

By publishing this uncertainty statement, Nike is owning up to the challenge of calculating accurate GHG emissions and showing that it is trying to take this task seriously. With that in mind, this task would likely become easier if the amount of emissions companies were allowed to produce was better regulated. There is not yet sufficient infrastructure to get an exact calculation on a business's emissions, but I hope in the future, that margin of error will continue to grow smaller.

To summarize Nike's three sources of sustainability information, the brand does a good job by offering consumers a lot of information, a fact not all brands can say. Nike has a stylized webpage, website, and Impact Report all available to consumers to investigate its environmental action. The Sustainability webpage seems to target primarily consumers and the Purpose site exists as an industry resource. Both do a good job of detailing Nike's goals and current technology succinctly and with accessible language. Some data points are included which often have a disclaimer on the limitations of the data, which is a concern. Most of the data, however, is left in the Impact Report for those that really want to dig into the details. Overall, I think Nike has a lot to hide behind its goals for zero carbon and zero waste. It's an industry behemoth that has the funds to tackle this issue, in theory, but as consumers are asking, brands must commit to sustainability even if it means losing profit (27). It's impossible to know whether profit has to be sacrificed for a brand to implement valuable sustainability initiatives into its business model, but Nike must be held accountable in its progress toward its sustainability goals. Only time and continued access to important sustainability data will tell if Nike can truly become a carbon neutral apparel brand.

“Is Nike sustainable”	“Nike sustainability report”	“Nike eco-friendly”
<p>How Ethical Is Nike? - Good On You</p> <p>- <i>Good on You</i>, 2020</p>	<p>FY20 NIKE, Inc. Impact Report</p> <p>- <i>Nike</i>, 2020</p>	<p>Nike Sustainability. Move to Zero</p> <p>- <i>Nike</i></p>
<p>Nike Sustainability. Move to Zero</p> <p>- <i>Nike</i></p>	<p>FY20 NIKE, Inc. Impact Report</p> <p>- Amazon AWS</p> <p>- <i>Nike</i>, 2021</p>	<p>At Least 20% Sustainable Material. Nike.com</p> <p>- <i>Nike</i></p>
<p>Here's what Nike is doing to become more sustainable in 2021</p> <p>- <i>Dazed</i>, 2021</p>	<p>Nike publishes 2020 Impact Report, sets new targets for 2025</p> <p>- <i>Fashion Network</i>, 2021</p>	<p>Planet Nike Purpose</p> <p>- <i>Nike</i></p>
<p>Nike Inc - Ethical Consumer</p> <p>- <i>Ethical Consumer</i></p>	<p>NIKE Global Impact and CSR Report – NIKE Spent \$81.9 ...</p> <p>- <i>The CSR Journal</i>, 2020</p>	<p>Sustainable and Eco-Friendly Shoes for Every Occasion - Nike</p> <p>- <i>Nike</i>, 2022</p>
<p>How Green is Nike? — The Greenish Life, But Greener</p> <p>- <i>The Greenish</i>, 2021</p>	<p>Nike, Inc. Corporate Responsibility Report FY07-09</p> <p>- <i>Fibre 2 Fashion</i>, 2021</p>	<p>Sustainable Materials. Nike.com</p> <p>- <i>Nike</i></p>

Table 2: Google Search Terms – What pops up when searching Nike’s sustainability information?

In simulating the consumer’s journey to source Nike’s sustainability information, this table represents Google search terms and responding links to access brand sustainability information in various formats.

Reformation

Reformation's tagline is "Being naked is the #1 most sustainable option. We're #2." As a brand founded in sustainability, users can find Reformation's sustainability data right from the homepage of its website. The first section of the homepage features product photography, but scrolling down, the following sections are [Getting stuff done](#) and [The Sustainability Report](#). On the sustainability report page, Reformation already has its 2022 quarter one report published and available for shoppers to read. The message attached to the report is as follows,

Here at Ref, loving the planet is a year-round thing. That's why sustainability is at the core of everything we do. We believe in focusing our efforts where we can make the biggest impact for our business and the planet. So we send out this report at the end of each quarter to show where we're at in our four main areas of sustainability: People, Planet, Product, and Progress.

With sustainability as the basis of Reformation's brand, the company has always made discussion around the environment and its connection to its products very conversational. As a women's apparel brand targeting primarily Millennials and Gen-Z, the company's tone reflects the language these generations use, including some slang and informal wording. Everything is written so casually and with accompanying visuals that viewers don't realize they're reading about a topic that's considered "scientific." An example of this is Reformation's numbers and figures section called "Sexy Math." This section discusses its internal lifecycle tool RefScale, which calculates its environmental footprint by adding the pounds of carbon dioxide emitted, gallons of water used, and pounds of waste generated by the business. A climate neutral certified seal is also featured under this section which proves the brand offsets 100 percent of its emissions. In a basic chart, Reformation states its carbon footprint to date in 2022.

Instead of showing how much it used or emit, it shows how much Reformation is saving compared to the industry standard.

2022 Year to Date total footprint

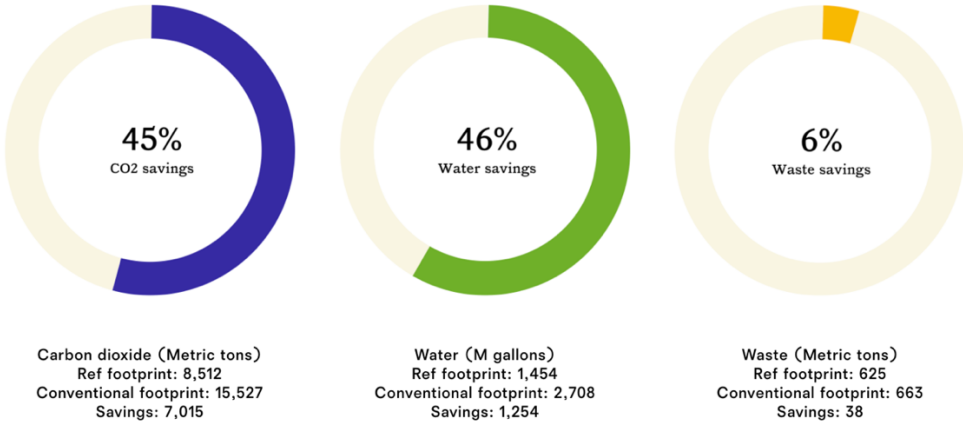


Figure 4: Reformation’s Total Footprint to Date in 2022

On Reformation’s sustainability page, the brand shows the exact amount of metric tons and metric gallons of water, carbon dioxide, and waste they’ve produced in comparison to the industry standard thus far in 2022

If shoppers want to look at Reformation’s annual report, the 2021 report is available at the bottom of the Sustainability webpage. The first page of this report is a sustainability scorecard made by [Eco-Age](#), a third-party sustainability strategy agency that measures Reformation’s progress and sources opportunities for the brand to grow as a leader in sustainable fashion. Eco-Age makes changes to its benchmark to reflect the ever-changing sustainability landscape. In 2021 biodiversity, circularity, and animal welfare were added as topics.

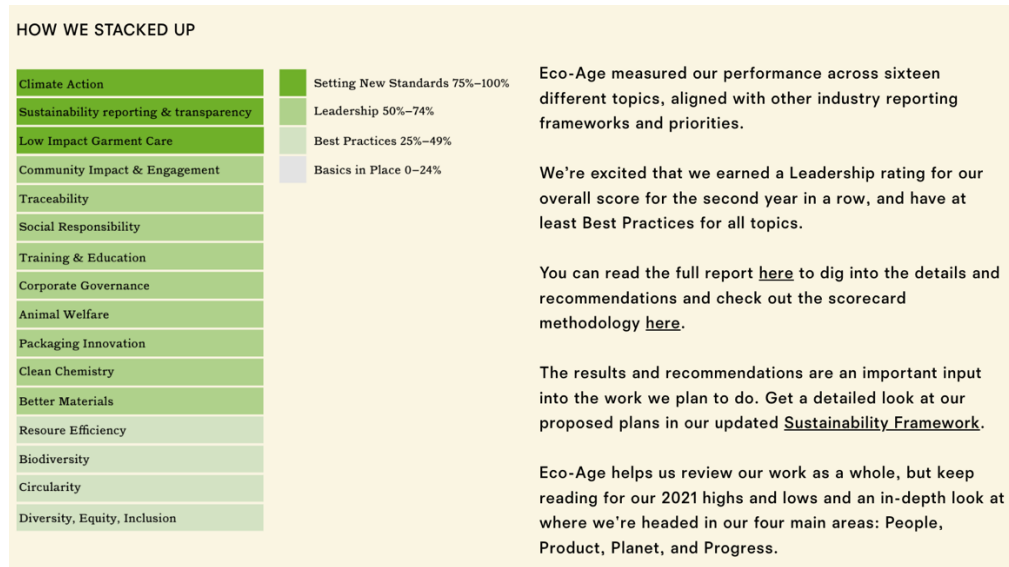


Figure 5: Reformation’s 2021 Sustainability Scorecard

Eco-Age, a third-party sustainability strategy agency rates Reformation’s progress across sixteen different categories to be included in their annual sustainability report

This scorecard is not only easy to read and understand, but to the right there are hyperlinks to sources that explain the scorecard methodology and elaborate on why Reformation scored the way it did in each category. This is one of many examples of Reformation breaking down areas of sustainability in an accessible fashion. Another successful tactic Reformation employs is reporting a “high,” “low,” and “focus” for each of its four areas of sustainability. No one likes to admit their faults, especially not brands which is what makes Reformation sharing its successes next to a failure and goal so impressive. To admit you are not perfect is to establish more trust between you and another person, or in this case, between a brand and buyer. In the product section of the 2021 annual report, the high was that Reformation invested in innovative materials. The low was that it did not hit its 2021 clean chemistry goal, and its focus for 2022 is to improve resource efficiency. These statements are somewhat vague but beside each one is an explanation showing how and why Reformation succeeded or failed. This is a very

succinct way to summarize goals that brands set and whether they met them or not, plus what they're doing now to make sure they succeed the next time around.

All in all, Reformation does an incredible job making scientific reporting data accessible to its consumers. With all the brand's sustainability information readily available on its website the content is thorough but not overwhelmingly long. This is likely because the company *wants* it to be accessible – in its language, visuals, text, etc. Where some brands use imagery to distract from text, Reformation uses captioned imagery to share important facts or data points. Furthermore, Reformation utilizes simple charts to share its environmental data.

Reformation is an interesting case study because it's a brand founded in sustainability, where most businesses are not. This gives it an advantage in publishing its sustainability data but none of its methods are untransferable to other businesses. The difference between Reformation and the other brands mentioned above is that Reformation only offers its quarterly and annual reports whereas other brands typically offer a consumer facing sustainability webpage and a longform annual report for investors. Reformation has no distinction between what's for consumers and what's for investors, at least from a sustainability standpoint. Reformation also shares minimal data points from each of its four sustainability categories. This is likely because it wants to keep the document accessible to consumers and not overload them with information. More failures could be hidden in what is not published on Reformation's site, but generally speaking, its sustainability data is more open and accessible to consumers than the average apparel brand today.

“Is Reformation sustainable”	“Reformation sustainability report”	“Reformation eco-friendly”
How Ethical Is Reformation? - Good On You - 2019	The Sustainability Report Reformation	Sustainable practices Reformation
Sustainable practices Reformation	How Ethical Is Reformation? - Good On You - 2019	How Ethical Is Reformation? - Good On You - 2019
Is Reformation Ethical and Sustainable? - Wear Next. - 2021	Reformation: Brand Report, Sustainability, and Ethics - <i>Selfless Clothes</i> , 2019	Is Reformation Ethical and Sustainable? - Wear Next. - 2021
The rise and fall of Reformation - Glossy.co	Reformation Annual Report by DEARZAVA - Issuu - 2020	Ethical Fashion: How Carbon-Neutral Reformation Is ... - Forbes - 2021
Ethical Fashion: How Carbon-Neutral Reformation Is ... - Forbes - 2021	THE SUSTAINABILITY REPORT: Q2 - Reformation - Milled - 2021	Virtue and Vanity at Reformation The New Yorker - 2019

Table 3: Google Search Terms – What pops up when searching Reformation’s sustainability information?

In simulating the consumer’s journey to source Nike’s sustainability information, this table represents Google search terms and responding links to access brand sustainability information in various formats.

Stella McCartney

Via Stella McCartney's main website, its sustainability webpage can be found on the footer. From there, there's a gif with an arrow that when clicked takes users down the page to the brand's sustainability intro. In a lower section, readers will find a Sustainability Timeline that outlines the brand's current and past innovations in the environmental space. Like Reformation, Stella McCartney was founded on sustainable ideals and since day one, in 2001 its made clothing with no feathers, leather, fur, or skin from animals. The timeline very clearly states the year and what innovation was introduced into the brand at that time. Stella McCartney's other sustainability sections include [Circularity](#), [Social Sustainability](#), and [Measuring Our Impact](#).

The Circularity page is more of an education platform than a way for Stella McCartney to share its cyclical successes. Some of Stella McCartney's partners are listed on the page and address the topic of circularity but no data shows how many of Stella McCartney's products are recycled, re-enter their supply chain, or are resold in secondhand markets.

Under Measuring Our Impact, Stella McCartney says, "We use a natural capital accounting methodology to measure and understand our impact on the environment that goes far beyond traditional environmental reporting."³⁷ The brand goes on to elaborate on the Environmental Profit and Loss (EP&L) tool which it uses to measure its greenhouse gas emissions, water use, water pollution, land use, air pollution, and waste across their global supply chain. At the bottom of the page there's a link to Stella

³⁷ *Measuring our Impact*. (n.d.). Designer Clothing | Luxury Fashion | Stella McCartney US. Retrieved May 7, 2022, from <https://www.stellamccartney.com/us/en/sustainability/measuring-our-impact.html>

McCartney's 2018-2019, 2017, 2016, and 2015 Eco Impact Reports. These are surprisingly out of date compared to other brands' reports. Though its website is out of date, Stella McCartney's 2020 Eco Impact Report is published and appears as the second result when users search "Stella McCartney sustainability report" on Google.

Like the sustainability webpage, the 2020 Eco Impact Report starts off with a timeline detailing the brand's environmental successes from each year.³⁸ It's broken into short chapters and like Reformation, utilizes simple charts to describe environmental impact across waste, materials, emissions, etc.

³⁸ *2020 Eco Impact Report*. (2020). Stella McCartney.
https://www.stellamccartney.com/on/demandware.static/-/Library-Sites-StellaMcCartneySharedLibrary/default/v10fa54905bdecf9d53f57900f8000b97231cfce6/report/EcoImpact_2020.pdf







ENVIRONMENTAL IMPACT GROUP	PROPORTION OF IMPACT		
	2017	2018	2019
 Air Emissions	07%	07%	07%
 GHGS	36%	27%	27%
 Land Use	29%	37%	37%
 Water Consumption	12%	09%	10%
 Water Pollution	07%	18%	17%
 Waste	09%	02%	02%

Table 2. Distribution of total impact by environmental impact group from 2017-2019

Figure 6: Stella McCartney’s Distribution of Total Impact by Environmental Impact Group from 2017-2019

This is an example of a chart used in Stella McCartney’s Eco Impact Report.

The whole report spans 39 pages long which is shorter than most standard ESG or CSR reports. It’s also stylized, following a color palette and utilizing brand fonts. The language used in the report is also unlike common ESG or CSR reports, using accessible language that primarily excludes industry jargon. The length of this report, inclusion of charts, and the use of accessible language seem to imply this report may be targeting consumers who want to know the details of Stella McCartney’s environmental impact.

For a luxury brand strongly invested in sustainability, Stella McCartney publicizes very little hard data on its environmental impact. Its reporting methods are educational, explaining in paragraphs the importance of things like regenerative

farming, organic fibers, and using recycled materials but do not show how these practices are represented in Stella McCartney’s supply chain via data.

“Is Stella McCartney sustainable”	“Stella McCartney sustainability report”	“Stella McCartney eco-friendly”
How Ethical Is Stella McCartney? - Good On You - 2018	Measuring our Impact Stella McCartney US	Sustainability - Eco-friendly Clothing - Stella McCartney
Sustainability - Eco-friendly Clothing - Stella McCartney	ECO IMPACT REPORT 2020 - Stella McCartney	Stella McCartney Made an Impassioned Call for Sustainability - <i>Vogue</i> , 2021
What Stella McCartney Taught Us About Sustainability - L ... - <i>L'officiel</i> , 2021	Sustainability - Eco-friendly Clothing - Stella McCartney	What Stella McCartney Taught Us About Sustainability - L ... - <i>L'officiel</i> , 2021
Stella McCartney Made an Impassioned Call for Sustainability - <i>Vogue</i> , 2021	Stella McCartney Eco Impact Report 2018/19 - <i>Stella McCartney</i> , 2020	How Ethical Is Stella McCartney? - Good On You - 2018
How Sustainable is Stella McCartney? Luxiders Magazine	2017 Environmental Profit and Loss Account - Stella McCartney	How Sustainable is Stella McCartney? Luxiders Magazine

Table 4: Google Search Terms – What pops up when searching Stella McCartney’s sustainability information?

In simulating the consumer’s journey to source Stella McCartney’s sustainability information, this table represents Google search terms and responding links to access brand sustainability information in various formats.

Burberry

The easiest ways to source Burberry’s sustainability reporting is to either search “Burberry sustainability report” in a search engine (see Table 5) or go to the footer of Burberry’s shopping site.

Starting at Burberry’s footer, under the drop-down menu “Our Company” users can click on “Sustainability” to be directed to Burberry’s environmental information. The front page of this webpage is a rotating gif of images with the words “Burberry Beyond” across it (see Figure 7).³⁹

³⁹ *Burberry Beyond*. (n.d.). Burberry® Official | British Luxury Fashion & Beauty. Retrieved May 7, 2022, from <https://us.burberry.com/burberry-beyond/>

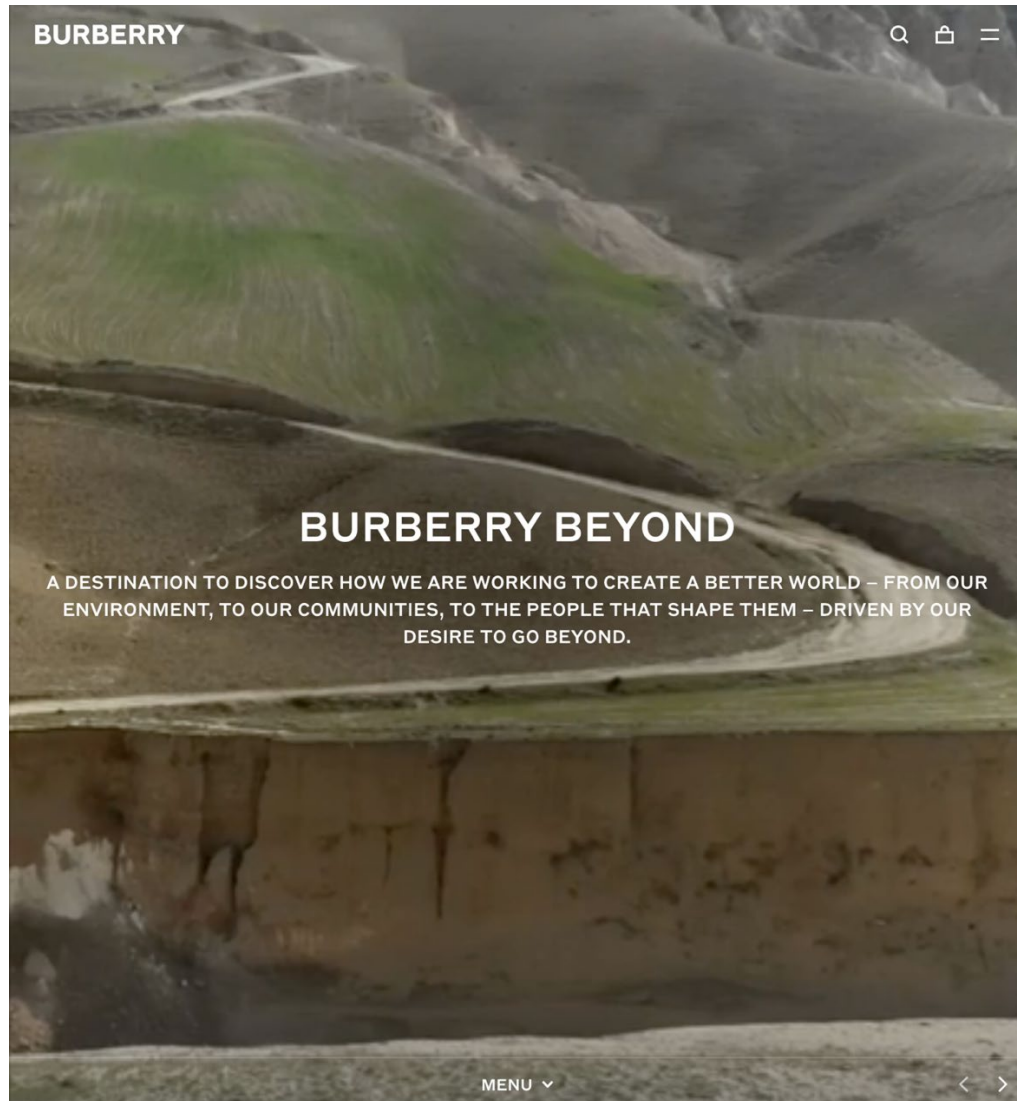


Figure 7: Burberry's Sustainability Landing Page

Burberry has a high-tech website built to share its environmental initiatives. That consumer journey starts here with this rotating gif and the title “Burberry Beyond.”

The sections under Burberry's sustainability page are “Environment,” “Communities,” and “People.” Focusing on the [Environment page](#), Burberry has four more hyperlinked pages there, including “Going Beyond, For Better,” “Going Beyond For Biodiversity,” “Our Products,” and “The Cashmere Journey: Afghanistan.” In a blog style, each page is heavy in text, and includes large imagery and video content. On the “Going Beyond, For Better” page, Burberry pledges to become climate positive by

2040. Under that statement is a side-by-side video and photo, followed by eight paragraphs talking about Burberry's history and future of sustainability. In the text, Burberry says, "As we work toward our goals, we will accelerate our ambition to reduce emissions across our extended supply chain, aiming to reduce them by 46 percent rather than our previous goal of 30 percent, by 2030, and become Net-Zero by 2040."⁴⁰ This is followed by information on the Burberry Regeneration Fund which was established in 2020 to fund carbon offsetting to "tackle the environmental impact of our operations." Carbon offsetting is not necessarily a bad thing but it's better to develop ways to emit less carbon than pay an organization to offset what you produced. After this text and one more photo, this page offers no further details on how Burberry will become climate positive.

Moving onto "Going Beyond For Biodiversity," Burberry says it will "protect, restore, and regenerate nature" through three focus areas: protecting and restoring nature, regenerative supply chains, and support for farming communities. While quite repetitive, there is no elaboration on what the action in any of these three focus areas may look like. Instead, the webpage is very photo and video heavy as seen in Figure 8 below.

⁴⁰ *Going Beyond, for Better*. (n.d.). Burberry® Official | British Luxury Fashion & Beauty. Retrieved May 7, 2022, from <https://us.burberry.com/going-beyond-for-better/>

PROTECTING AND RESTORING NATURE

Minimising negative environmental impacts and supporting projects through the Burberry Regeneration Fund.



REGENERATIVE SUPPLY CHAINS

Applying regenerative and holistic land management practices to grazing and farming.

Figure 8: Burberry's Going Beyond For Biodiversity Webpage Example

Burberry's webpages on the environment are very text and video heavy with little text and no hard data.

On the "Our Products" page, Burberry states "By 2022, every product we produce will make a positive social or environmental impact and by 2025, all of our key materials will be 100 percent traceable – helping our products to have a positive environmental and social impact for years to come."⁴¹ With no further information, it's impossible to know what Burberry means by every product making a positive social or environmental

⁴¹ *Our Products*. (n.d.). Burberry® Official | British Luxury Fashion & Beauty. Retrieved May 7, 2022, from <https://us.burberry.com/our-products/>

impact. Furthermore, Burberry admits to not having full traceability in its supply chain but does not offer any data on its current progress.

On its last Environment page, “The Cashmere Journey: Afghanistan” describes an environmental project Burberry is conducting to develop a more “inclusive, sustainable and resilient cashmere industry in Afghanistan.”⁴² The webpage includes a short film on the topic and three statistics on the goats of Afghanistan.

All in all, these four webpages on Burberry’s site give very little information into specific action Burberry is taking to protect our environment. The sections remain vague and goal-driven with no accompanying progress or data.

Turning to Burberry’s 2020/2021 Environmental, Social and Governance report, this document is not linked or downloadable anywhere on Burberry’s website but can be found via a Google search. This report is 34 pages and uses the same three sections as Burberry’s Sustainability webpage: “Our People,” “Our Communities,” and “The Environment.”⁴³ Unlike the website, it does outline Burberry’s goals and progress within each of those sections. For example, a product goal was to “procure 100% of our cotton more sustainably by 2022 by using a portfolio approach. This includes working with partners and exploring new sources, including organic and regenerative cotton.” Burberry next states that its met this goal 78% as of 2021 when this report was published. The only table with hard data on this report was on global GHG emissions. The rest of the report continues the pattern of sharing goals and possible percent points on how close it is to meeting those goals. This information is however, buried in 34

⁴² *The Cashmere Journey: Afghanistan*. (n.d.). Burberry® Official | British Luxury Fashion & Beauty. Retrieved May 7, 2022, from <https://us.burberry.com/c/the-cashmere-journey/>

⁴³ *Strategic Report | Environmental, Social and Governance*. (2021). Burberry.

pages worth of paragraphs, content the average consumer will not take the time to read through. Burberry is putting up a very performative front with its ESG report and Sustainability webpage and needs to improve by sharing more background information and data to support its environmental goals.

Table 5: Google Search Terms – What pops up when searching Burberry’s sustainability information?

In simulating the consumer’s journey to source Burberry’s sustainability information, this table represents Google search terms and responding links to access brand sustainability information in various formats.

“Is Burberry sustainable”	“Burberry sustainability report”	“Burberry eco-friendly”
Burberry - Sustainability Rating - Good On You Directory	Burberry Environmental Social and Governance 2020/21	Burberry - Sustainability Rating - Good On You Directory
Trending: Burberry, Gucci Strut Ever Closer to Sustainability - 2021	ESG - Burberry Group Plc	Environment - Burberry Group Plc
Approach to Responsibility - Burberry Group Plc	Approach to Responsibility - Burberry Group Plc	5 Sustainable Products Made by Burberry - LeafScore
The British luxury brand Burberry and its sustainable ...	RESPONSIBILITY AGENDA 2017 – 2022 Our goals - Burberry ...	Trending: Burberry, Gucci Strut Ever Closer to Sustainability -2021
Burberry and Moncler Are The Most Sustainable Fashion Brands - 2021	Results & Reports - Burberry Group Plc	The British luxury brand Burberry and its sustainable ...

Brand Sustainability Reporting Study Findings

To summarize the five analyses above, we can conclude that it's common for brands to publish a long form report and to have a webpage on their shopping site that addresses their sustainability initiatives. Sustainability webpages on brands' sites are intended for consumer use and typically remain at a surface level with their content. These sites typically employ performative language, distract viewers with visuals, and are very goal-oriented versus factually based. Brands often spend a lot of time explaining their material innovation or technological advancements instead of their impact. They would rather tell buyers about regenerative cotton and recycling programs than how much waste they produce in a year. New innovations appear positive but when there is no data attached to them, it's impossible to know whether their implementation actually has a positive impact on our environment. Consumers cannot assume because a brand is innovative that it's also sustainable because innovation too has an environmental cost.

Most brands also publish a longer form report like a Corporate Social Responsibility Report or an Environmental, Social and Governance Report. Some brands link these directly on their websites for consumers to access and some can only be found through a Google search. These reports vary greatly in length and the depth of data. All of them employ a creative style guide to make the content more engaging but in most cases, the target audience of these reports is not consumers, based on their length and language. SHEIN and Reformation both have their reports accessible on their websites whereas Nike and Stella McCartney have links on their sites to download

their impact reports as PDFs. Burberry is the outlier with no place to access their sustainability report via their website.

On their websites or reports these brands share the names of the partners that help them certify their reporting, offset their emissions, and those helping them develop new technology. Reformation is certified climate neutral through the organization [Climate Neutral](#).

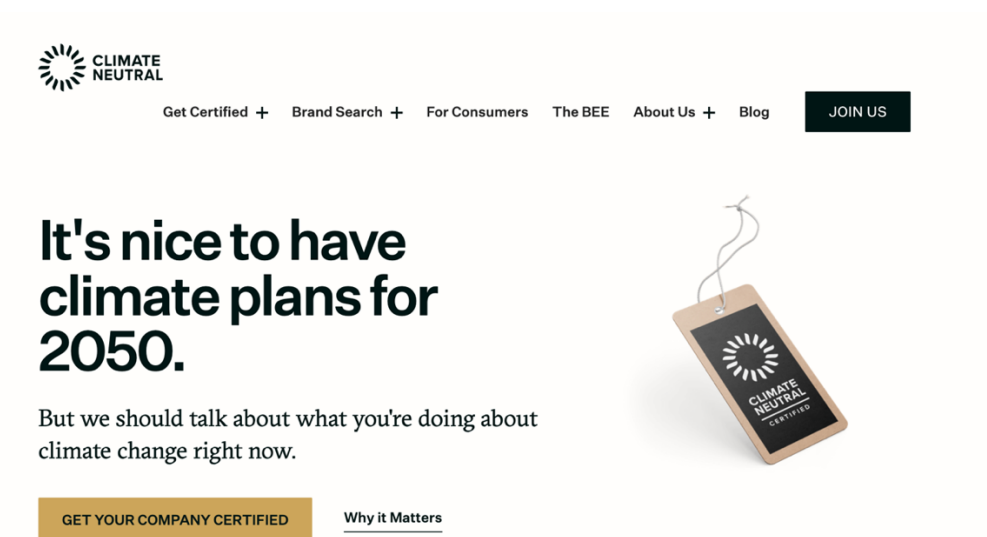


Figure 9: Decarbonization Organization, Climate Neutral’s homepage

Climate Neutral is an organization that partners with brands, like Reformation, to help them offset their emissions. Their mission is to “eliminate carbon emissions by making climate neutrality something that all businesses do.”

Reformation also states they have a relationship with [Land To Market](#), the world’s first outcomes-based verified sourcing solution for regenerative agriculture and [Fashion for Good](#), a global platform working to change the fashion industry through innovation and collaboration. It’s important that brands share their sustainability partners because these partners can hold brands accountable to continue improving.

Stella McCartney states specifically it uses Kering’s EP&L reporting tool to measure and monetize its environmental impact and Nike is a member of the Sustainable Apparel Coalition. Nike also partners with the [Better Cotton Initiative](#) to help farmers use less water and fewer chemicals in producing products’ raw materials. Burberry says it’s a member of the [Ellen MacArthur Foundation’s](#) Make Fashion Circular Initiative and they partner with [PUR Projet](#) to implement regenerative agriculture practices in their supply chain.

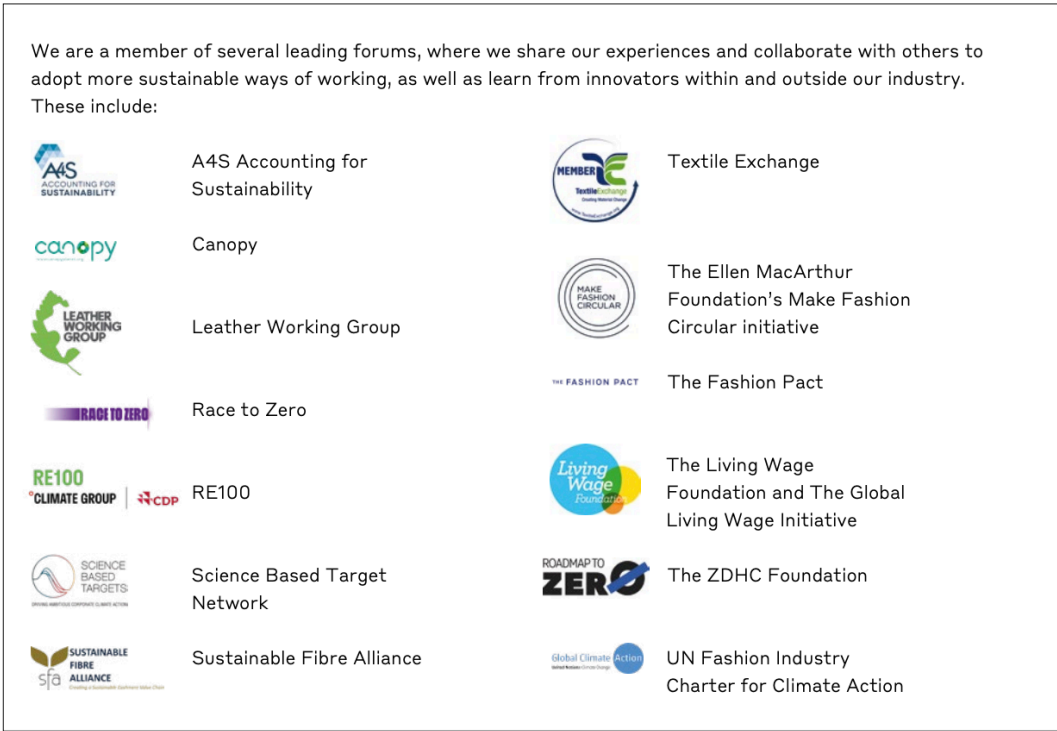


Figure 10: Burberry’s Listed Partners in the Sustainability Sector

Burberry offers this list of organizations they partner with to help improve sustainability in the apparel industry.

For having so many partnerships with environmental organizations, Burberry offers very little hard data on their own sustainability journey.

The lack of publicized partnerships is telling too. SHEIN generalizes the Non-Governmental Organizations (NGOs) it partners with to monitor its compliance with environmental standards to “organizations who can provide meaningful perspectives” and only addresses non-profits it donates to by name. This is notable because SHEIN does not share any hard data on its environmental standards nor specific goals it has in this area. The lack of names in who’s monitoring their business should feel suspicious to those looking into SHEIN’s environmental impact.

From numerous methods of reporting, environmental partners, and certifications, it’s no surprise that navigating brands’ environmental response is no easy task for consumers. There is no standardization across brands and no way to know whether one certification or rating is more valuable than another. Burberry uses Kering’s EP&L tool to report on their environmental impact whereas SHEIN uses no tool at all. Nike has a full website dedicated to the environment whereas Reformation keeps its reporting tight and right on its main website right next to its shopping pages. These discrepancies must be addressed if consumers are to start understanding the true impact of their apparel purchases.

The Future of Reporting

The future of sustainability reporting in the apparel industry is no easy thing to predict, especially as one lone consumer. That's why I reached out to industry professionals working in and around sustainability to explain the nuances of sustainability reporting today and understand what they envision the future of accessible brand sustainability reporting could look like. I spoke to sustainable business owners, brand sustainability advisors, non-profit organizers, and the sustainability editor at Adweek, an American advertising trade publication. See the full contact list in the appendix. Here are some of the things they said.

What do you think stops people from thinking and shopping sustainably now?

Joel Shoening, Vice Chair Member of the Association of Oregon Recyclers: *A lot of people think they are shopping sustainably. Marketers have capitalized on sustainability as an opportunity. There's tons out there that suggests people will pay extra for a product that they believe is sustainable. So people are out there buying products that are labeled sustainable in one way or another. I think a lot of people actually feel like they are shopping sustainably, whether or not you can shop sustainably at all. On the flip side of that, because there's a premium on sustainability, those people who can afford it or think they can, I think they are doing it already. And people who can't afford it, it's out of their price range. So the sustainability label has become a band aid for people who can afford it and has made it unreachable for everybody else.*

Emily McKay, Remake Community Organizer for Canada and Executive Director & Founder of Rising: *I would say, top two reasons would be people have a misunderstanding that shopping sustainably is going to be more expensive when that is not necessarily true, and people are addicted to shopping. And that is social media's fault. It's our consumer society's fault. It's our government's fault. Our Western society's fault. It's the growing up with haul videos and the fact that you can't wear something twice on an Instagram post. It's that mentality that has created a group of people who are addicted to shopping.*

Elias Stahl, Founder & Chief Executive of Hilos Shoes: *Education and price.*

What about current brand sustainability reporting methods are inaccessible to consumers?

Emily Stochl, Remake's Director of Education: *Greenwashing of sustainability terminology has made it very difficult for consumers to wade through the messages brands are putting out about the impact and discern real results from "pledges" and marketing language. The [Remake Fashion Accountability Report](#) aims to make this whole process more transparent. Our findings are all completely open-source, meaning brands only receive points for information that is available to customers, not just industry-insiders.*

Kathryn Lundstrom, Adweek Sustainability Editor: *All of it? I think there's a lot of really complex issues but oftentimes, brands allow that to obscure the real meaning of their sustainability messaging because it's easier to keep all the complex stuff in the report in a way that you really can't understand it, unless you have an advanced degree in sustainable business, or just spend a lot of time looking at these things. And then just kind of like, give a quippy little "we love sustainability" message through advertising.*

Becca Coughlan, Remake's Transparency Manger:

I just think, on their websites and stuff brands are trying to be more explicit in presenting what they're doing. But even that is difficult. You need to do the deep dive to understand those consumer facing websites, what that language means. But when you do the deep dive as well it's just so overwhelming.

Emily McKay, Remake Community Organizer for Canada and Executive Director & Founder of Rising: *I think it's really interesting that so many third-party assessors have cropped up like the B-Corp and Certified Organic and those types of things. But I don't think a lot of people know that brands have to pay for those certifications. So those companies are automatically associated with those brands because they're getting paid by them. Whereas Remake doesn't get paid by brands to give them a score. So when a brand isn't B-Corp certified that doesn't necessarily mean they don't live up to those standards that B-Corp has set, it's probably because they can't afford the certification because they're a smaller brand. And the smaller the brand, the more*

sustainable they're likely to be. So there's a lot of things that I think people don't really understand about that part of the industry.

Can we trust brands to be transparent in their sustainability reporting?

Joel Shoening, Vice Chair Member of the Association of Oregon Recyclers: *No.*

Kathryn Lundstrom, Adweek Sustainability Editor: *No, I would say no. But then again, I talk to marketers all day long. Maybe other people have a more optimistic perspective, but I just feel like the incentives aren't there. Like if the goal of a company is to make money and sell more, then there's no incentive to transparently report. I guess the only incentive is that you don't want to be embarrassed, right? You don't want your brand to be the example. You don't want to be [the Volkswagen of fashion brands](#).*

Where does initiative need to come from for brands to become more sustainable and report in a more accessible and transparent way?

Joel Shoening, Vice Chair Member of the Association of Oregon Recyclers: *I actually think a foundation funded, nonprofit or academic study would be a great place to start. Then you'd go through a negotiation with government and the industry to all come to the table and adopt it. I think if it's created by business or government there's potentially too much opposition. But if you have an independent research group, take that initiative, then you could get closer to having a methodology that more people would agree on.*

Joel Shoening, Vice Chair Member of the Association of Oregon Recyclers: *from my perspective, in the United States, the business and industry have basically said, the environmental issue is a consumer choice issue. And the way we solve it is for consumers to make smarter choices. That's not going to get us a solution. That's putting the emphasis in the wrong place. What we need is structural systems and policies in place that regulate. No consumer is going to have time to do the research on every single consumer purchase they make.*

We've done this in other industries. When you buy a home, you sign 400 pages worth of documentation because consumers have been ripped off by the industry. But now there's rules in place to protect you, we need the same attention paid to the environment, as we put into finance instruments.

Ian Yolles, Advisor, Board Member & Thought Partner for Brands, Early-Stage Ventures & Non-Profits: *Perhaps first and foremost, from employees of that company. I think employees can have a strong impact on the internal thinking of any company. That's certainly one segment that can be a catalyst for change from the inside out.*

Ian Yolles, Advisor, Board Member & Thought Partner for Brands, Early-Stage Ventures & Non-Profits: *I think it requires an inward look on the part of particular brands to understand the nature of the impact that it's having, and then making some commitments over time to begin to lessen that impact. It has to start with that kind of internal analysis, and commitment. There's nothing inherently constraining any brand*

with the exception of making the commitment and realizing why it's important not only from a planetary standpoint, but ultimately from a business point of view.

Kathryn Lundstrom, Adweek Sustainability Editor: *I think it would have to come from regulators. There would have to be penalties in order for brands to actually get on board.*

Becca Coughlan, Remake's Transparency Manger: *I think we're seeing more and more fashion related legislation being introduced around the world, that I think collectively, there is the thought that this is going to be the most effective way to make lasting change. Because, you know, nonprofits and whoever have been trying to get brands to change for decades, and brands are just not going to hold themselves accountable. So I personally think that the only way that we'll see proper change is through legislation, like binding agreements.*

Emily McKay, Remake Community Organizer for Canada and Executive Director & Founder of Rising: *I definitely know that we cannot trust the majority of brands to be truthful or to give the whole picture in their sustainability reporting. Not all brands, but for the most part, so then the responsibility kind of falls on governments to make it mandatory for certain pieces of information to be shared, which is, as far as I understand a big portion of the New York Fashion act that's in the works right now. So pieces of legislation like that, that make it mandatory for certain information to be shared, such as wages, or regular audits of factories or something like that. Or*

obviously on the environmental side of things, CO2 emissions, water wastage, those types of hard numbers, and making that legally required by brand to release that information. Now, that doesn't necessarily mean that that information is going to be easily accessible or understandable by the average consumer. So in that case, it's organizations like Remake, who are not at all brand affiliated to make that information, easily accessible for consumers, which I think they're doing a brilliant job of.

What's the future of brand sustainability reporting look like, especially for consumer use?

Joel Shoening, Vice Chair Member of the Association of Oregon Recyclers: *Oregon passed Senate Bill 582 last year, which is an extended producer responsibility bill. I think the extended producer responsibility model will result in a lot of increased transparency, because it sends real price signals back to brands, about the cost of disposing of their products. The extended producer responsibility is a great model, or at least it has a ton of potential to really create some transparency. If it's structured right, you still allow industry flexibility to innovate, and to manage the program. But you have a public oversight body that requires a certain level of reporting and shared responsibility. I've seen some research that suggests when institutions, especially government and business or government and academia partner, there's increased levels of trust. So I think those models have a lot of potential.*

Ian Yolles, Advisor, Board Member & Thought Partner for Brands, Early-Stage Ventures & Non-Profits: *My sense is that most consumers don't want to or have the time or the interest or the inclination to dive.*

Ian Yolles, Advisor, Board Member & Thought Partner for Brands, Early-Stage Ventures & Non-Profits: *I think there are examples of third-party certifiers. Although it's challenging, because we're talking about many levels of complexity in terms of, are we talking about greenhouse gas emissions, use of toxic chemicals? Are we talking about the impact of water? Manufacturing? There's a lot of inherent complexity. So I'm also a little reluctant to try to reduce it to some sort of rating. I think that's part of the challenge. Even if you want to go this sort of certification route, how do you ensure that that third party certification is reliable and consistently applied across different companies operating in different places, different sized supply chains? It's not entirely easy to answer, you know, to get to a shorthand that is both accessible to consumers, but also meaningful? I think that's a challenge.*

Kathryn Lundstrom, Adweek Sustainability Editor: *What would be helpful is if there was some kind of standard, as far as what exactly brands have to report so that consumers could get a sense. Because if you just open up any sustainability report, and you try to understand what it's telling you it's impossible to compare between one brand and another. The way that it's laid out, the terms they're using, it's all different, it's all jargony. I think if there were reporting requirements, and then an easy to access*

database of all of that stuff that would trickle down into all these different formats that consumers use.

Becca Coughlan, Remake's Transparency Manager: *the internet is obviously major. Organizations like Remake and then increasingly, fashion publications are starting to report more accurately and more critically of these issues. And I think that's a really big piece of the puzzle as well. And then just social media in general. I would also include other media like, watchdog organizations and advocacy groups, as being like the middlemen. And then again going back to the education aspect of it as well, I think that is what we're increasingly seeing. For example, Remake has partnered with another organization and is piloting sustainable fashion curriculum in middle schools and high schools. I just think that younger generations through school curriculums, through social media are growing up inherently more aware of these issues, and hopefully will then be more critical.*

Becca Coughlan, Remake's Transparency Manager: *Today, so much of sustainability, and like the solution is put on the shoulders of the consumer. And I think that's been a very intentional move by not just fashion companies, but big oil companies, every kind of company and every kind of industry, so that they don't have to be accountable. And so again, it comes down to this thing of like, oh, well, me as a consumer, I have to be the change, which I agree is a big component of the puzzle. But I think that it's just not going to happen quick enough. We shouldn't spend our lives stressing about which t-shirt to buy. All t-shirts should just be sustainable. All language around us should just*

be truthful and genuine. And, again, that's very, like idealistic, but that's why my personal view, is that it needs to come from the top down. Legislation needs to be in place that prohibits brands from taking consumers for a ride because, people have so much to do in life. I don't want to waste my time reading a CSR report every time I want to go to the shops, be that for a T shirt or like, a packet of food. I just think that while consumer education is a huge part of the puzzle, I think it's a crutch that companies and the world have used to continue to make very, very slow progress.

Elias Stahl, Founder & Chief Executive of Hilos Shoes: *Rather than brands just publishing sustainability reports, there should be third party audits, there should be third party case studies, there should be ways that they're working to advance the knowledge base of the entire industry, rather than just for themselves. I think that would be something I would hope we can move towards.*

Elias Stahl, Founder & Chief Executive of Hilos Shoes: *I believe that a lot of brands are setting very large goals at the board level, like we will be net positive by 2030, for instance, right? Why? Because they feel the pressure to do that. But they're not engaging in a conversation with their entire team around what are the actual ways that we believe we can be more sustainable today, tomorrow, two years from now, five years from now, and then working from there. I feel like that's a more thoughtful and intentional way to build a roadmap, which then says, we believe that in five years we'll be here, and these are the steps we're going to take to get there. And we've worked with our entire team, and there's buy in from the entire team. And there's clarity on how*

we're going to get there, and it doesn't feel like you know, a rock looming over your head. I think the way that brands are talking internally about sustainability goals, needs to change in order for them to be more effective and have an understanding of how to reach them.

What are the next one to three steps we need to take to transform the apparel industry to be more environmentally friendly?

Joel Shoening, Vice Chair Member of the Association of Oregon Recyclers: *There needs to be some advocacy work to recognize the impact of consumption. We had the plastic straw turtle prior to COVID. And sadly, we almost need another turtle straw moment. We need politicians and campaigns to consider material management in their campaigns, and we need a groundswell movement for that. We need some excitement at the policy level because that's what will drive the funding for the research and the methodology that would lead to an extended producer responsibility model, or even something like mandatory CSR reporting.*

Ian Yolles, Advisor, Board Member & Thought Partner for Brands, Early-Stage Ventures & Non-Profits: *I think what the Sustainable Apparel Coalition is doing is important in the sense that it's putting together a standardized set of meaningful sustainability measurements that are relevant across this particular sector. I think that's a huge initiative. But ultimately, it's going to be up to any particular apparel or footwear manufacturer, to choose to put the data to use. What will incentivize more and more apparel companies to use this tool? It's either gonna happen, because there's*

some enlightened leader, within a company, or the voice of the employees becomes strong enough that that not enlightened leader sees the light. Or there's going to be regulatory pressure, or there's gonna be customer pressure. In other words, the tools exist, the ability exists and ultimately, there's a choice that's made, you know, how serious are we about this?

Kathryn Lundstrom, Adweek Sustainability Editor: the fashion act in New York? I haven't done a deep dive into that legislation, but it sounds to me like that could be an exciting first step.

Kathryn Lundstrom, Adweek Sustainability Editor: I guess I feel like the safest things here is to say just regulation. Because I think if there was regulation that held brands responsible for the waste they create, that could start to address the problems of textile waste. It's mind boggling to go down a rabbit hole and look at where our old clothes end up, you know, like, in burning piles off the coast of Ghana or dumped in a desert somewhere? It's shocking.

Elias Stahl, Founder & Chief Executive of Hilos Shoes: You've got to understand what you're designing for in terms of environmental impact. So are you designing for a given material that's more sustainable, for a given disassembly process, for the ability to make on demand so that you eliminate overproduction? Whatever the levers are, you're seeking to pull to reduce your environmental impact, that's going to be your design brief.

How much of an impact do you think an advertising agency could have in helping a brand craft a legitimate, transparent story around sustainability?

Kathryn Lundstrom, Adweek Sustainability Editor: *I feel like greenwashing happens not because of any like ill intent, but because people just didn't know what they were talking about. If the people writing the copy for the ads in the agency don't have a solid understanding of what any sustainability term means and if they don't have a full understanding of what this brand is trying to say, then greenwashing can happen just by accident. They were just trying to make a nice green ad but then you know, you can end up with untrue statements in your ad copy if the right expertise isn't there.*

All brands are trying to talk about this stuff. But if you don't have the expertise to do it, then you shouldn't be doing it. But you should get the expertise as soon as possible to make sure that you can guide brands on this stuff, because it's only going to get more important.

Interview Findings

Speaking to these six industry professionals and learning their takes on the reality and future of brand sustainability reporting was coming to terms with the scale of the problem and how many parties play a part. A brand's sustainability extends to so many topics and includes factors from the conception of the raw materials to make a product to the day those same raw materials are recycled or more likely end up as waste. It will take time for us to tackle the full spectrum of the problem, but for now, there are a few specific impact points that brands should 100 percent share in an accessible fashion with their consumers. From what these professionals said, there are multiple ways to go about that sharing, but one thing that must occur is standardization and regulation across the industry. Brands cannot be trusted to transparently report on their sustainable impact, so they need a push from somewhere to do it. It will come from consumers voting with their wallets, non-profits and media watchdogs holding brands accountable, and internally from employees and company leadership saying this is important and we need to take it seriously. But it will also need to come from a clear, standardized expectation of what numbers absolutely *must* be publicized.

The next question is always why can't the market regulate itself? Is legislature absolutely necessary for this change to happen? If we had more time to stop climate change the answer could be no, but with the state of our planet, yes. It's possible that if consumers continue to vote with their wallets and ask for environmental change at the brand level that enough brands will get on board and start taking real action. But we unfortunately do not have time to wait for that shift. Climate change is here and it's going to be devastatingly detrimental. The global temperature cannot rise more than 1.5

degrees Celsius this century if we are to avoid catastrophic change on our planet. That means cutting our carbon dioxide emissions by 45 percent by 2030, a goal we are not on track to meet.⁴⁴ Businesses would like to offload the blame onto consumers, but most emissions come from corporations that must be held accountable. If we had centuries more time, apparel brands might eventually self-regulate and create more environmentally friendly and transparent supply chains, but we don't have that kind of time.

If this thesis proved one thing it's that the tools brands need to report on their environmental impact are already available to them. There will always be improvements to make like more accurate ways to calculate emissions or sourcing better alternatives for toxic chemicals, but the number of organizations ready to help businesses take environmental action today is already lengthy. The sad reality is a lot of brands are still actively choosing not to make their environmental data available to the public. Likely because it doesn't shine a positive light on them. That's why some form of regulation to get brands to start utilizing these tools will be essential to spreading standardized and accessible sustainability reporting across the apparel industry.

The standardization of reporting across the industry will be a challenge but we cannot allow brands to use this as a crutch. In fact, we cannot allow any more cutches at all. As Ian Yolles and Elias Stahl told me, brands must decide the environment is worth fighting for at an internal level. Yes, brands can build partnerships with third-party organizations to help them improve and report on their sustainability, and yes, we can

⁴⁴ McGrath, M. (2019, July 23). *Climate change: 12 years to save the planet? Make that 18 months*. BBC News; BBC News. <https://www.bbc.com/news/science-environment-48964736>

create regulatory systems to hold them accountable, but brands are the ones that must say, yes, this is important, here are the ways we're going to make change and track that progress transparently as we go.

It's time the era of performative change appears in our rearview mirror. It's time for real change that we agree from consumer to brand to planet, is essential to our survival.

Existing & Future Legislation Related to the Apparel Industry

Legislation to regulate the apparel industry is just starting to appear in the United States. On September 27, 2021, Senate Bill 62, also known as the [Garment Worker Protection Act](#), was passed in California.⁴⁵ This law makes California the first state to require garment workers be paid hourly versus per garment as was done prior to the law's passing. Senate Bill 62 also penalizes manufacturers and brands for wage theft and illegal pay practices. No apparel brand openly opposed this bill's passing, and some even signed a petition to help get it passed. This goes to show that business and the law can work together to create positive change. If brands were to oppose a regulatory bill on the use of greenwashing terms or environmental reporting this would show that they aren't willing to take climate change seriously which is not an option.

Senate Bill S7428, also known as New York's Fashion Sustainability and Social Accountability Act, or even shorter, as the Fashion Act was sponsored in 2021 by New York State Senator Alessandra Biaggi. Under the bill, apparel and footwear retailers with global revenue of at least \$100 million would be required to map their supply chains, disclose environmental and social impacts, and set binding targets to improve those impacts.⁴⁶ If this bill passes, it would be a great start for similar legislation to spread across the industry in the United States and world.

⁴⁵ Farra, E. (2021, September 30). *California Just Passed S.B. 62 to Protect Garment Workers—Here's What It Means for the Entire Fashion Industry*. Vogue. <https://www.vogue.com/article/california-sb-62-garment-worker-protection-act>

⁴⁶ *NY State Senate Bill S7428*. (2021, October 8). NY State Senate. <https://www.nysenate.gov/legislation/bills/2021/S7428>

Looking to the Future

To conclude, I'd like to lay out change that can and should come from every player in our fight to implement accessible and transparent sustainability reporting across the apparel industry.

Consumers: You are powerful.

Continue advocating for the importance of brand sustainability, vote with your wallets, seek out sources of education but be weary of performative messaging, and write your lawmakers and sign petitions to pass environmental regulations

Media Watchdogs: Continue to fight the good fight.

Root out brands' performative messaging and expose their true impacts. Use your platform to do the deep research dive that consumers cannot.

Advertisers: Get accountable and educated.

The days of creating advertising solely to sell products are behind us. Advertising has a significant environmental impact that can no longer be ignored. Use your agency for good by being conscious of greenwashing language, seek advice from experts in your branding, and say no to big oil clients.

Environmental NGOs: Keep up the good work.

Continue to hold brands accountable for their environmental impact and use your education to guide them to sustainable solutions. Work to educate American consumers

to make better shopping decisions by making brands' environmental impact data accessible to them until regulation catches up and forces that change.

Apparel Brands: See the light.

Caring for our environment and making sustainable change is no longer a suggestion, it's a requirement. Employees, speak up in meetings and voice solutions for change. Leaders, consider more than profits and lead your teams to innovative change that not only pleases your consumers but creates a better world.

The Law: Regulate and standardize.

Our environmental time clock is running out. Save our planet by implementing regulatory legislation that holds brands accountable for their environmental impact and helps consumers gain access to sustainability data.

Everyone has a part to play to get brands to make action-driven environmental change and make that change known at the consumer level. The task is large but not impossible. You know the players, you understand the current playing field, you know the reporting tools available, you have the language, you know the stakes, you know what part you play in the puzzle, and you even have some idea of what the future could look like. Now it's time to turn that knowledge into action.

Glossary

1. Biodiversity: biological diversity in an environment as indicated by numbers of different species of plants and animals⁴⁷
 - a. The apparel industry is a significant contributor to biodiversity loss. Apparel supply chains are directly linked to soil degradation, conversion of natural ecosystems, and waterway pollution.⁴⁸
2. Carbon Neutral: having a balance between emitting carbon and absorbing carbon from the atmosphere⁴⁹
3. Carbon Offsetting: to offset emissions made in one sector by reducing them somewhere else. This can be done through investment in renewable energy, energy efficiency or other clean, low-carbon technologies (49)
4. Climate Neutral: reducing greenhouse gas emissions as much as possible and compensating for any remaining emissions⁵⁰
5. Climate Positive: going one step further than Carbon Neutral by saving more greenhouse gas emissions than you generate⁵¹
6. Climate Sequestration: removing carbon from the atmosphere, or through offsetting measures, which typically involve supporting climate-oriented projects (49)
7. Cyclical Fashion: creating apparel with the intent to repurpose it at its end of life and turn it into something new to avoid waste

⁴⁷ Merriam-Webster. (n.d.). Biodiversity. In *Merriam-Webster.com dictionary*. Retrieved May 9, 2022, from <https://www.merriam-webster.com/dictionary/biodiversity>

⁴⁸ Granskog, A., Laizet, F., Lobis, M., & Sawers, C. (2020, July 23). *Biodiversity: The next frontier in sustainable fashion*. McKinsey & Company; McKinsey & Company. <https://www.mckinsey.com/industries/retail/our-insights/biodiversity-the-next-frontier-in-sustainable-fashion>

⁴⁹ *What is carbon neutrality and how can it be achieved by 2050?* (2019, March 10). European Parliament. <https://www.europarl.europa.eu/news/en/headlines/society/20190926STO62270/what-is-carbon-neutrality-and-how-can-it-be-achieved-by-2050>

⁵⁰ *5 facts about the EU's goal of climate neutrality*. (2020, October 13). Home - Consilium. <https://www.consilium.europa.eu/en/5-facts-eu-climate-neutrality/>

⁵¹ *What is climate positive?* (n.d.). To Carbon Neutral and beyond | Go Climate Positive. Retrieved May 9, 2022, from <https://go-positive.co.uk/climate-positive#:~:text=What%20does%20climate%20positive%20mean,emissions%20than%20you%20are%20generating.>

8. Greenwashing: behavior or activities that make people believe that a company is doing more to protect the environment than it really is (10)
9. Made to Order: (esp. of clothing) created especially for a particular person⁵²
10. Modular Concept: clothing items that have detachable pieces so that one can easily alter the clothing item to suit changing needs and tastes over time⁵³
11. Net Zero: when the amount of greenhouse gas released into the atmosphere is neutralized through carbon sequestration (49)
12. Non-toxic: not toxic⁵⁴
 - a. There is no regulated definition for what chemicals or materials in the apparel industry are non-toxic
13. Eco-Friendly: not environmentally harmful⁵⁵
14. Recyclable: to process materials or substances (such as liquid body waste, glass, or cans) in order to regain material for human use⁵⁶
15. Regenerative Agriculture: farming and grazing practices that, among other benefits, reverse climate change by rebuilding soil organic matter and restoring degraded soil biodiversity – resulting in both carbon drawdown and improving the water cycle.⁵⁷

⁵² *MADE TO ORDER*. (n.d.). Cambridge Dictionary | English Dictionary, Translations & Thesaurus. Retrieved May 9, 2022, from <https://dictionary.cambridge.org/us/dictionary/english/made-to-order>

⁵³ Peter, J. (2018, October 22). *Transformable Fashion: The Biggest Sustainable Clothing Trend That Never Was*. The Fashion Studies Journal; The Fashion Studies Journal. <https://www.fashionstudiesjournal.org/longform/2018/9/15/transformable-fashion>

⁵⁴ Merriam-Webster. (n.d.). Nontoxic. In *Merriam-Webster.com dictionary*. Retrieved May 9, 2022, from <https://www.merriam-webster.com/dictionary/nontoxic>

⁵⁵ Merriam-Webster. (n.d.). Eco-friendly. In *Merriam-Webster.com dictionary*. Retrieved May 9, 2022, from <https://www.merriam-webster.com/dictionary/eco-friendly>

⁵⁶ Merriam-Webster. (n.d.). Recycle. In *Merriam-Webster.com dictionary*. Retrieved May 9, 2022, from <https://www.merriam-webster.com/dictionary/recycle>

⁵⁷ *Why Regenerative Agriculture?* (n.d.). Regeneration International. Retrieved May 9, 2022, from <https://regenerationinternational.org/why-regenerative-agriculture/>

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Emily McKay	Remake Community Organizer for Canada, Executive Director & Founder of Rising	Virtual Interview
Joel Shoening	Vice Chair Member of the Association of Oregon Recyclers	Virtual Interview
Elias Stahl	Founder & Chief Executive of Hilos Shoes	Virtual Interview
Emily Stochl	Remake Director of Education	Interview Questions via Email
Ian Yolles	Advisor, Board Member & Thought Partner for Brands, Early-Stage Ventures & Non-Profits	Virtual Interview

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