



Supplier Tool Kit

REWE Group Detox Program

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Version 1.0



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List of Abbreviations

APEOs	Alkylphenolethoxylates
CAP	Corrective action plan
MRSL	Manufacturing Restricted Substance List
PAP	Produktanforderungsprofil (Product requirement profile)
POC	Pre-order Confirmation
MRSL	Manufacturing Restricted Substance List



1 Introduction

The REWE Group takes its responsibility for society and the environment very seriously. That is why REWE Group initiated its own program for a safer use of chemicals in the textile production and also joined the Greenpeace Detox Campaign in 2014. The objective of the REWE Detox Program is to assure the use of safer and less hazardous chemicals in the whole lifecycle and production procedures of textiles such as apparel, footwear products, and home textiles for private label products by no later than 2020. In line with the Detox Program, REWE Group has committed to implement transparency in the textile supply chain, promote the use of non-hazardous chemicals in the textile production and therefore significantly reduce the release of hazardous substances into the water. The REWE Group strongly believes that these ambitious goals can solely be achieved in cooperation with other companies of the textile industry as well as with all supply chain partners. With joint efforts of all affected supply chain partners the REWE Group believes that the release of hazardous chemicals into the water can be improved.

This tool kit is aimed to

- ✓ Provide a general overview of the REWE Group Detox Program
- ✓ Give an overview of the process to become a Detox compliant supplier
- ✓ Clarify all corresponding requirements for you as one of our suppliers

2 REWE Group Detox Program

The Detox Campaign was initiated by Greenpeace in 2011 to achieve a toxic free supply chain. Since then more than 30 international fashion brands and retailers have joined the campaign. REWE Group tries to join forces with these companies to raise awareness for the consequences of hazardous chemicals in textile production and works on their phase out from production. In doing so, REWE Group follows the clean factory approach. This means, that REWE Group expects all suppliers to phase-out hazardous chemicals not only for REWE Group textiles, but establishing a chemical management to ensure that no hazardous chemicals are used in any production process in the whole factory.



Although there are a lot of hazardous chemical groups which need to be addressed in the long run, the foremost attention of the REWE Group Detox Program is with the following 11 priority chemical groups:

1. Alkylphenols
2. Phthalates
3. Brominated and Chlorinated Flame Retardants
4. Azo Dyes
5. Organotin Compounds
6. Perfluorinated Chemicals
7. Chlorobenzenes
8. Chlorinated Solvents
9. Chlorophenols
10. Short Chain Chlorinated Paraffins
11. Heavy Metals

The goal is to phase out these 11 chemical groups as well as additional hazardous chemicals which are defined on the REWE Group MRSL till 2020.

2.1 Scope of the Detox Program

The REWE Group Detox Program focuses on all private label textile products. In this sense textile means apparels, home textiles and shoes which are sold in one of the Penny, REWE or Toom DIY shops. All business partners involved in the production process of REWE Group private label textile products need to ensure that hazardous chemicals are phased out of their production till 2020.



2.2 The REWE Group Detox Roadmap

To achieve the goals of the Detox Program, a roadmap with eight steps which are in line with the main requirements outlined in the REWE Group Detox Commitment has been defined. These steps do not follow a defined order and do not end at a defined point of time. Only step 1 as starting point and step 8 as ending point are clearly defined, whereas all other steps are dealt with in parallel and continuously.

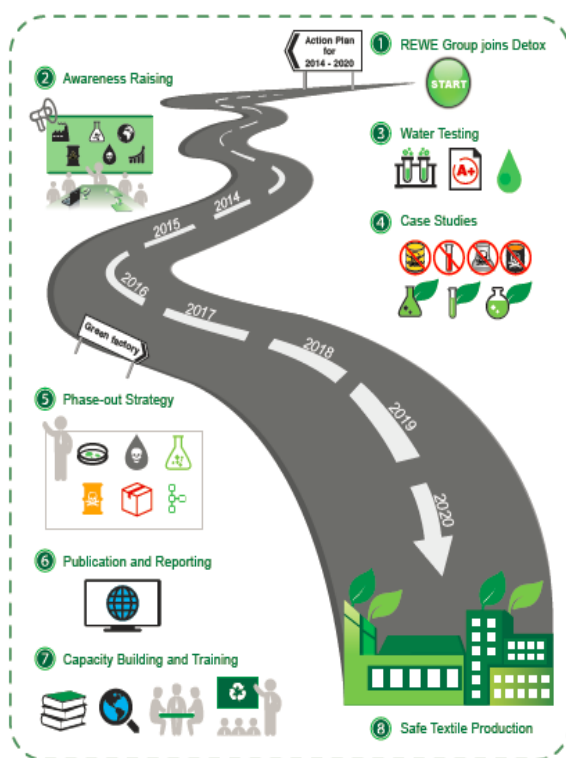


Figure 1: Detox Roadmap

1. REWE Group joins Detox in December 2014.
2. To implement the Detox Program, the REWE Group ensures a continuous dialog with all textile suppliers.
3. Waste water and occasionally sludge testing helps to raise the status quo for the phase-out strategy defined by the factories.
4. In case studies, the REWE Group outlines examples for the substitution of hazardous chemicals.
5. For any chemical defined in the REWE Group Manufacturing Restricted Substance List (short: MRSL), a phase-out timeline has been defined.
6. The REWE Group reports on the progress to raise awareness about the importance of more environmental-friendly textile production.
7. Trainings and workshops for suppliers and factories are a key element of the REWE Group Detox Program.
8. The aim is to ensure safer textile production by the end of 2020 in order to create a safer future for humans and the environment.



2.3 REWE Group MRSL and Phase Out Strategy

The MRSL is a list with hazardous chemicals that need to be phased out of the textile supply chain by the end of 2020, and builds the basis for REWE Group's Detox Program. It defines limit values (tolerance levels), test methods and timelines for each chemical listed. These parameters are set for the chemical formulations used by wet process facilities as well as for their waste water, sludge and products. The REWE Group MRSL contains the 11 priority chemical groups as well as further hazardous substances that will be phased out from production and replaced by safer alternatives.

The REWE Group MRSL builds on the MRSL defined together with Greenpeace. However, it is updated and revised at least on an annual basis. Generally, for the screening and elimination of hazardous chemicals, REWE Group follows the precautionary principle. This means that substances with potentially hazardous characteristics are not allowed for the production, even if these properties have not yet been clearly shown.

The yearly analyses might require changes with regard to the chemicals or substances listed, the defined limit values or test methods. The following sources will be used for this update:

- Feedback and new information from service providers
- Benchmark of MRSLs and standards
- Research studies and chemical screening tools
- Internal evaluation of chemicals

A standardized process is applied to ensure that the MRSL reflects the most current knowledge as well as the best current technology with regard to limit values. Furthermore there is a three-stage process to decide about the incorporation of new chemicals in the MRSL, comprising of (1) identification of new potentially hazardous chemicals, (2) screening of the intrinsic characteristics of these substances and (3) evaluation and classification with regard to inclusion to the MRSL. The most recent version of the MRSL can always be found on the [REWE Group website](#).

3 Process for Suppliers and Wet Process Facilities

The process for suppliers and wet process facilities when joining the Detox Program is divided into four steps. Starting with gathering information and the commitment to the program, the



following, second step focuses on supply chain transparency. The third step includes the monitoring of the progress that each wet process facility makes towards zero discharge. In the last step, corrective actions need to be undertaken and are supported by trainings. Every supplier will undergo the process of the REWE Group Detox Program with all of its wet process facilities producing main parts of Detox relevant product. In the following, each step of the process is explained in detail.

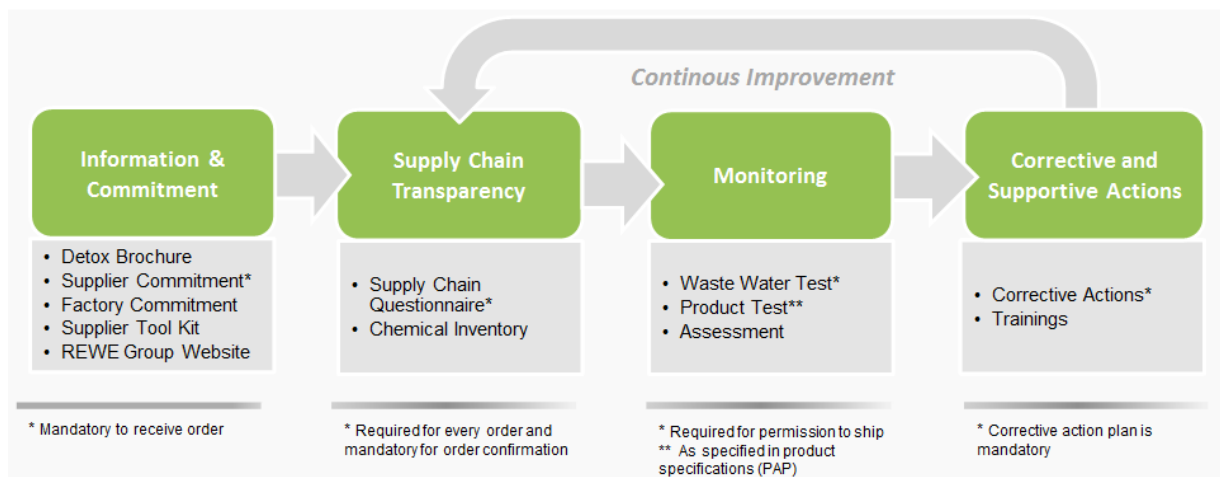


Figure 2: Process for Suppliers & Wet Process Facilities

The described process is applicable for every order and is mandatory for wet process facilities producing main parts of textiles ordered by the REWE Group, which covers supply chain transparency, monitoring as well as corrective and supportive actions. To reaffirm your and other REWE suppliers' obligation, the Detox requirements are also an integral part of every REWE supplier contract. This includes the submission of valid water test reports, the signing of the Supplier Commitment which incorporates the consent to a transparent supply chain, publication of test results and the willingness to get audited. By repeating the process, suppliers and their wet process facilities are expected to achieve continuous improvement.

3.1 Information and Commitment

In the first step, each supplier is provided with the Detox Brochure and the link to the Detox section on the REWE Group website. Furthermore, you receive the Detox Supplier Tool Kit as well as the Supplier Commitment. The Supplier Commitment must be signed by you as a REWE



Group supplier within two weeks after receiving it. Thereby, you agree – among other – to phase out hazardous chemicals, to disclose discharge data and to allow audits of your wet process facilities. To be considered in any tender, it is mandatory for every supplier who produces private label textile products for the REWE Group to sign the commitment once. It is your responsibility as one of our suppliers, to ensure that all wet process facilities involved in the production of main parts of REWE Group products sign the Detox Factory Commitment. Please send all signed commitments to detox@rewe-fareast.com two weeks after you receive the commitment template via email.



Figure 3: Ready by: Sourcing

3.2 Supply Chain Transparency

In addition to the supplier commitment every direct supplier will receive the Supply Chain Questionnaire which is supposed to create greater transparency of all supply chain partners involved in the production of any REWE Group textile product. Therefore, you as one of the REWE Group suppliers are asked to outline all supply chain partners contributing to the production of the textile product specified in the order. It is important that the production processes the factories or subcontractors perform during the production of the respective order are listed in detail in the questionnaire. The completed questionnaire must be available at the time of the Pre-order Confirmation (short: POC). If there are no wet processes in your supply chain, you need to prove that by sending detailed information on the process you use and explaining how the production is possible without any wet process. You furthermore need to provide clear evidence, for example by sending pictures that show your alternative production process. This proof – explanation as well as evidence – must be submitted by you to detox@rewe-fareast.com.



Figure 4: Ready by: Pre-order Confirmation

It is the responsibility of you as a supplier working with the REWE Group to ensure that the wet process facilities establish a Chemical Inventory including the CAS numbers for all chemicals.



Only if the facilities are aware of all the substances used during their production, it is possible for them to identify those hazardous chemicals that need to be replaced. If you lack a template for the chemical inventory please contact detox@rewe-fareast.com.

3.3 Monitoring

The monitoring steps consist of three main parts: first, the waste water test including the IPE upload, second, the product test and third, audits which may be required to verify all information delivered and to ensure that all supply chain partners are on the track to zero discharge on-site. In case of an audit you will be contacted by us in advance.

Waste water tests

After delivering the basic information, the commitment, the Supply Chain Questionnaire and the Chemical Inventory, you as one of our suppliers need to ensure that no banned chemicals are used in production. To assess the status quo, the waste water of the wet process facilities in your supply chain needs to be tested at least once per year.

The below checklist can help you evaluate whether a waste water test is needed for the facility. In general, those facilities with wet processes concerning the production of the main components of the product need to be tested.

- Wet processes are processes such as bleaching, dyeing, chemical finishing, garment washing, impregnation, post-print washing and printing.
- **For textiles**, main components are those that represent at least 30% of the total weight of the finished product for textiles. Ingredients and reinforcements are not main components.
- **For shoes**, main components are those that make up 80% of the upper, those that make up 80% of the lining and the sock and those that make up 80% of the outer sole. Ingredients and reinforcements are not main components.

	Upper
	Lining & Sock
	Sole

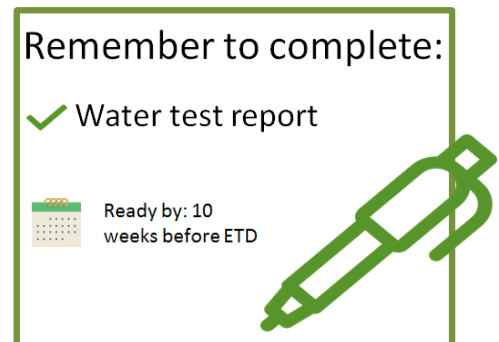


Figure 5: Ready by: 4 weeks after order confirmation

As soon as an order has been placed, you need to submit a valid test report for every wet process facility identified as carrying out a wet process for the main components. The waste



water report is valid for one year based on the report date if there is no banned chemical included. When the waste water test is going to expire, you are responsible to provide a new one, even if you do not have any running order with the REWE Group at the moment. Only selected service providers, who are familiar with the REWE Group requirements, are authorized to do the sampling and testing. For now, SGS and Intertek have been approved by REWE Group.

Testing institute	Contact
SGS	Simon.Draeger@sgs.com; Jasmine.To@sgs.com
Intertek	REWE.DETOX@intertek.com

The waste water tests target the 11 priority chemical groups mentioned before, and assure that non-compliances are identified. Furthermore, general chemical parameters are tested to ensure legal requirements are met. The costs for the tests have to be covered by you.

If you already have a valid test report of another institute or brand available, this report needs to be verified by one of the authorized testing institutes familiar with the REWE Group requirements, to assure that these requirements are fulfilled. In case that the test report fails to fulfil the requirements of the REWE Group, you need to ensure that the respective wet process facility conducts a new waste water test.

Minimum Requirements:

The current minimum requirements for a valid test report based in the ETD are:

- The waste water samples need to be taken after treatment. Just in special cases and after the confirmation of the REWE Group the samples are allowed to be taken before treatment.
- The tests have to cover at least the 11 priority chemical groups.
- No banned chemicals may be found in the samples.
- The test report is not allowed to be older than one year.



It furthermore has to dispose of the obligatory cover sheet that will be added by one of the selected testing institutes after having analysed the results, or checked a report of another testing institute or brand. The cover sheet and the summary of findings attached to the report make it easier to spot non-compliances or critical findings in general, since they provide you with a comprehensive overview over the test results. These will also help you to establish the corrective action plan (short: CAP, see chapter 3.4).

In figure 6, the testing procedure is shown. A waste water test consists of multiple steps and takes several weeks to be completed. Therefore, it is important for you to keep in mind that the testing has to be scheduled several weeks before the results are needed, to ensure the shipment can take place without problems.

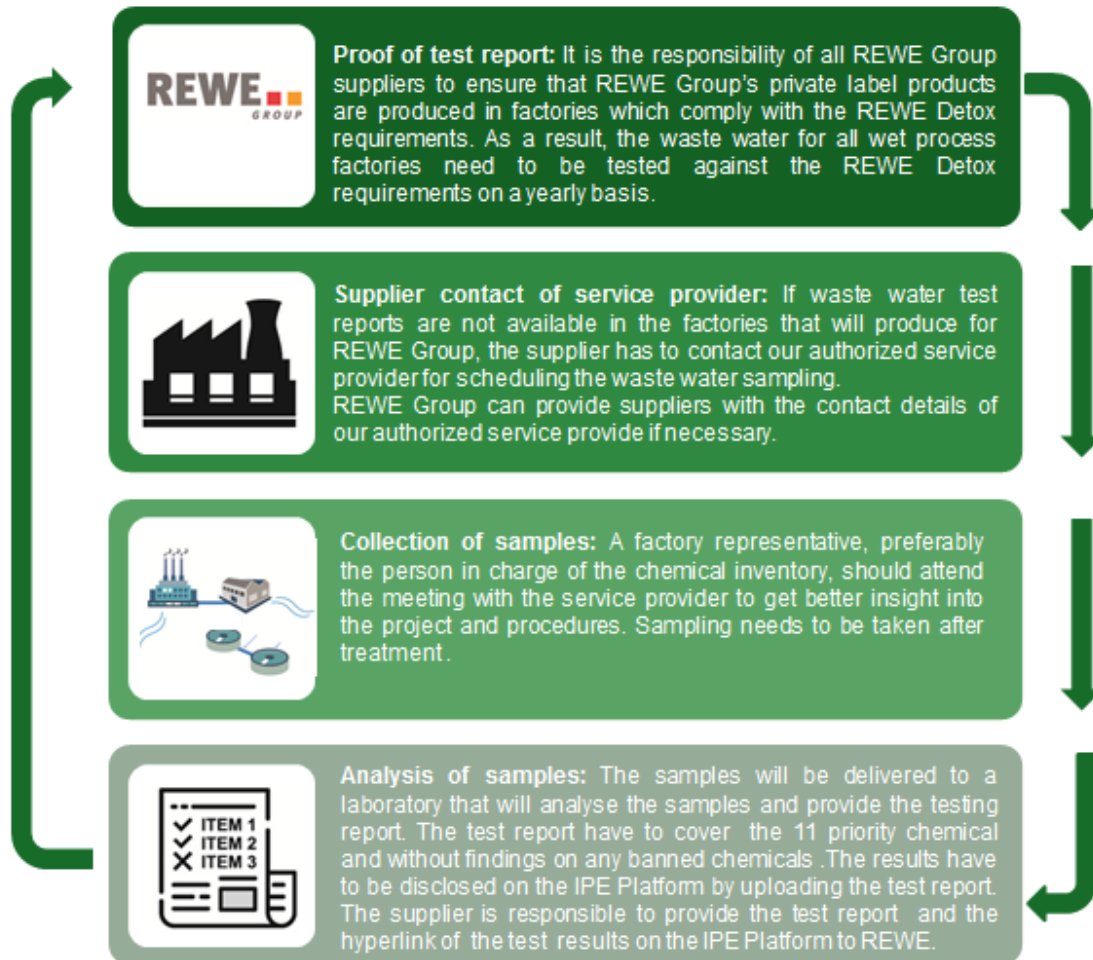


Figure 6: Process for Waste Water Tests

IPE upload

The [IPE platform](#) is a public database where waste water test reports are made accessible to the public. All test reports need to be uploaded to the IPE platform after they have been provided to you by the service providers. This public disclosure ensures transparency about the current status of discharge and your development towards elimination of hazardous chemicals. Every Detox relevant wet process facility is supposed to sign an agreement with one of the selected testing institutes so that these are able to access the IPE platform and support the wet



process facility to upload the test reports. You are responsible to ensure the accuracy, completeness and punctuality of this process. After the upload of your facilities' waste water test reports has been completed, you as our supplier need to provide us with the link to the test reports on the IPE platform by sending the link to detox@rewe-fareast.com.

Product tests

In line with the REWE Group standard procedure all textile products will be tested for Detox conformity according to the product specifications (short: PAP). The product specifications will be sent to you with every order to make you aware of the requirements. The subsequent product tests shall ensure that banned chemicals have been substituted. The testing requirements are continuously updated with regard to the latest version of the MRSL; therefore it is important that you carefully read every product specification you receive.

3.4 Corrective and Supportive Actions

It is important that you work closely together with your wet process facilities to replace the hazardous chemicals and implement processes which ensure that only compliant chemicals are used in future. Therefore, based on the results of the waste water test and the non-compliant findings identified you need to define a CAP together with your wet process facilities. This CAP shall outline the planned measures to tackle the non-compliant findings and define corresponding timelines. It needs to be provided to the REWE Group latest 8 weeks after the waste water report has been issued. Based on the measurements and timelines defined in the CAP the REWE Group tracks the progress made by you and your wet process facilities. However, the details of the implementation are not stipulated by REWE Group, but are rather within the discretion of each supplier, together with the wet process facilities in its supply chain. You have to update and adjust the CAP together with the wet process facilities as soon as new test results or other insights are available. Furthermore you have to provide a monthly update to the REWE Group by sending the updated CAP to detox@rewe-fareast.com. To support you and your wet process facilities in the implementation, REWE Group invites suppliers to workshops and trainings to convey knowledge. The constant



Figure 7: Ready by: 4 weeks after waste water test



exchange with suppliers enables REWE Group to recognize obstacles in the Detox implementation process as early as possible.

To actually phase out hazardous chemicals, the MRSL is a critical document to refer to. It defines which chemicals need to be phased out from the production process, and till when. From the test report you can see which substances have been found in the waste water of the respective wet process facility. Further information regarding the chemical groups can be found in some chemical fact sheets provided on the [REWE Group website](#). In the next step, you together with your wet process facilities need to identify which used chemicals or input materials have caused the negative findings of the tests. In discussion with the chemical suppliers you or your wet process facilities use, you need to find alternative chemicals which are not hazardous and which do not include substances named in the REWE Group MRSL. In the FAQs (see Chapter 5) you can also find some further sources for safer alternatives.

For the REWE Group it is important that all suppliers together with their relevant wet process facilities work to replace the hazardous chemicals and implement processes which ensure that only conform chemicals are used in future. The process itself rather takes place at the wet process facility, REWE Group provides assistance if necessary.



4 Summary

To summarise your task in the REWE Detox programme, figure 8 depicts steps that you are required to go through in the Detox process.

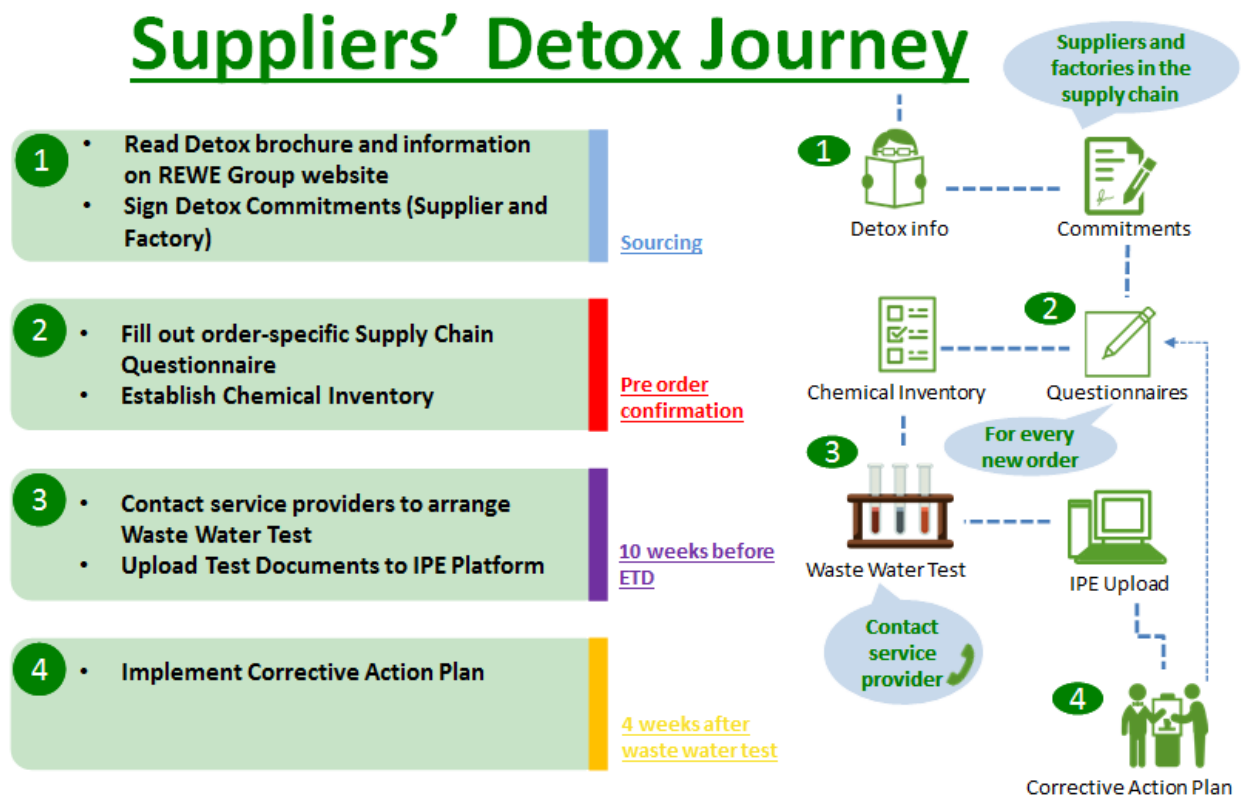


Figure 8: Suppliers' Detox Journey



5 Frequently asked questions (FAQs)

1.) What is the REWE Group Detox Program about?

Please refer to chapter 1 and 2 of this tool kit. You can find more information on the roadmap and on our Detox Program in our [REWE Group Detox Brochure](#) and the [REWE Group website](#).

2.) Which product groups are covered by the Detox Program?

Detox covers all REWE Group private-label-brand textile products including apparel, shoes and home textiles.

3.) What is the content of REWE Group's Detox Program?

REWE Group has committed to:

- Assuring the use of non-hazardous chemicals throughout production processes for our private label textile products by 2020
- Phasing out the use of hazardous chemicals defined in the REWE Group MRSL
- Disclosing information on discharges by factories in the supply chain
- Raising global awareness about sustainable consumption
- Reporting our progress and findings
- Implementing capacity building and training programs for supply chain partners
- Developing a pilot project to reduce the environmental footprint and/or impact on society by textiles (e.g. closed loop projects)

Further details can be found in [REWE Group's Detox Commitment](#) and on the [REWE Group website](#).

4.) Which companies have committed to the Greenpeace Detox Commitment?

Adidas, Aldi, Benetton, Berbrand Srl, Besani Srl, Burberry, C&A, Canepa, Coop (Schweiz), Esprit, Gritti Group, G-Star Raw, H&M, Italdenim SpA, .Kaufland, Lanfranchi, .Levi's, Li Ning, Lidl, Mango, Marks&Spencer, Miroglio SpA, .Nike, Paramo, Primark, Puma, Rewe Group, Tchibo, Tessitura Attilio Imperiali SpA, Uniqlo (Fast Retailing), Valentino, Victoria's Secret (Limited Brands), Zara (Inditex), Zip Gdf SpA, Prato Textile Suppliers, Other Italian Suppliers (As of July 2016). An up to date list can be found on the website of [Greenpeace](#).



5.) Is there one Detox Commitment for all companies?

No, the Detox Commitments are individual from company to company. However the requirements of the Detox Commitments have risen over the years, the goal of phasing out hazardous chemicals from the textile supply chain by the end of 2020 is the same for all companies.

6.) Why is it important to ensure chemical safety in the textile supply chain?

Hazardous chemicals used in various stages of textile production can have a significantly harmful impact on the ecosystem as well as on the health of workers. By teaming up with suppliers and manufacturers and integrating the Detox Program into REWE Group's existing sustainability strategy, REWE Group will significantly reduce the release of hazardous substances into the environment and, in particular, into water. The program will contribute to environmental protection and further increase the safety for consumers and workers.

More information is available in our [Detox Brochure](#) and on the [Greenpeace website](#).

7.) Which hazardous substances will be phased out?

The following 11 chemical groups have the highest priority and will be phased-out of the supply chain by 2020:

1. Alkylphenols, Alkylphenol-ethoxylates
2. Hazardous Azo-dyes & Carcinogenic Dyes
3. Chlorinated Solvents
4. Chloro-benzenes and Toluenes
5. Chlorophenols
6. Heavy Metals and Metalloids
7. Flame Retardants
8. Organotin Compounds
9. Phthalates
10. Perfluorinated Compounds
11. Chloroparaffins

You can find the full list of the defined hazardous chemicals in our Manufacturing Restricted Substance List (MRSL) on our website.



8.) What are the requirements REWE Group has for a valid test report?

REWE Group's requirements for waste water test reports based on the ETD are as follows:

- The waste water tests are conducted after treatment and are allowed to be conducted before treatment in exceptional cases
- The tests have to cover the 11 priority chemical groups
- No banned chemicals may be found in the samples
- The test report is not older than one year

9.) How does my company benefit from participating in a Detox project like REWE Group's?

Detox will support you in protecting your workers' and consumers' health as well as the environment. Joining the Detox Program is an investment in the future as more and more companies and customers are asking for more sustainable textiles. Participating in Detox will give you the chance to obtain support for phasing out hazardous chemicals from REWE Group and its service providers who are specialized in chemical management. Our service providers will offer training and information materials for your factories.

10.) What is a MRSL?

MRSL is an acronym for **M**anufacturing **R**estricted **S**ubstance **L**ist. The MRSL is a list with hazardous chemicals that need to be phased out of the textile supply chain by the end of 2020. The MRSL also defines limit values (tolerance levels), test methods and timelines. These parameters are set for the chemical formulations used by factories as well as for their waste water, sludge and products.

The REWE Group MRSL is available on our corporate website and is updated annually.

11.) What is a CAS number?

Every chemical is assigned a CAS (**C**hemical **A**bstract **S**ervice) number. While names for chemicals may differ, the CAS number is a reliable constant to help identify a substance. The Chemical Abstract Service is part of the American Chemical Society and maintains a database of chemical compounds and sequences. The CAS database currently contains over 55 million different organic and inorganic chemical compounds. Each CAS entry is identified by a CAS registry number, or CAS number for short.



12.) Where can I find a list of commercial products that may be suitable substitutes for hazardous chemicals?

- ZDHC – www.roadmaptozero.com
- HeiQ Materials – www.heiq.com
- Nano-Tex, Inc – www.nanotex.com
- Huntsman – www.huntsman.com
- Rudolf Chemie – www.rudolf.de
- CHT Bezema – www.cht-group.com
- BASF – www.basf.com
- Bayer – www.bayer.com

13.) Does REWE Group monitor MRSL adherence?

Yes, REWE Group will request data from suppliers and request that they will carry out waste water tests to ensure non-hazardous chemicals are used during textile production. These test reports have to be sent to REWE Group. Compliance will furthermore be assured within the product tests that are conducted for each product. They include all chemicals that are banned due to the Detox Program.

14.) What databases can I use to find more information regarding Green Chemicals?

- Greenscreen - www.greenscreenchemicals.org
- EcoPassport - www.oeko-tex.com
- Cleangredients - www.cleangredients.org
- Bluesign - www.bluesign.com
- ChemSec Textile Guide - textileguide.chemsec.org
- Subsport - <http://www.subsport.eu/>
- GOTS (not a database but standard) - <http://www.global-standard.org/>

15.) Where can I find background information on chemicals?

- Information on registered substances
<http://apps.echa.europa.eu/registered/registered-sub.aspx>
- European Chemicals Agency (ECHA)
<http://echa.europa.eu/>
- U.S. Environmental Protection Agency (EPA)



- <http://www.epa.gov/>
- Consumer Product Safety Improvement Act (CPSIA)
<http://www.cpsc.gov/about/cpsia/cpsia.html>
 - California Green Chemistry Initiative
<http://www.dtsc.ca.gov/PollutionPrevention/GreenChemistryInitiative/index.cfm>
 - ESIS: European Chemical Substances Information System
<http://ecb.jrc.ec.europa.eu/>
 - OECD: Global Portal to Information on Chemical Substances
<http://www.echemportal.org/echemportal/page.action?pageID=0>
 - Substitution Support Portal
<http://www.subsport.eu/>
 - Afirm: provides a toolkit for suppliers including general information on hazardous chemicals
<http://www.afirm-group.com/toolkit/>
 - Textile guide – ChemSec’s new online tool
<http://textileguide.chemsec.org/>



Contact:

REWE Far East

E-Mail: Detox@rewe-fareast.com

Website: www.rewe-group.com