TIME TO DELIVER

A REPORT ON TRANSPARENCY AMONG SWEDISH ONLINE FASHION BRANDS





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Fair Action is a non-profit organisation pushing Swedish companies to take responsibility for their impact on people and the environment. We examine how consumer goods and services are produced and pressure companies to improve working conditions and pay living wages. Fair Action is a member of the Clean Clothes Campaign. This report has been financed by ForumCiv. Responsibility for the content lies entirely with the creator. ForumCiv does not necessarily share the expressed views and interpretations.

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SUMMARY

The coronavirus pandemic has accelerated the trend towards a shopping culture in Sweden that is increasingly taking place online. In the first quarter of 2021, the e-trade sales of the Swedish apparel and footwear retailers alone had increased by 34 percent compared to the same, non-pandemic struck period the year before. Close to one in three pieces of garments sold in 2020 was traded via eCommerce platforms, and this proportion is expected to rise. Many of the online companies involved in the exploding sector are racing to the top and have become among the fastest growing businesses in Sweden.

Fair Action hopes this race for sales will include the same high ambitions towards, and investments in, sustainable business practices. Transparency in the supply chain plays a key role in transforming the fashion business into an industry where factory workers can make a decent living off their wages, raise their collective voices through free, independent unions, and where the climate and environmental footprint of the fashion industry on our planet is minimized.

In this report, six of the largest and most influential Swedish online fashion brands have been placed under scrutiny regarding their willingness to openly share information about their supplier factories and data on average factory floor wages.

We found that three of the companies, NA-KD, Bubbleroom, and Ellos Group are publicly disclosing information about their private label suppliers, including names and addresses of the factories. The other three companies, Ridestore, Junkyard, and Stronger, have committed to publish their supplier lists during 2021.

While there may be a general positive shift in the willingness among brands to publish supplier lists, progress seems dependent on external pressure. Furthermore, none of the brands are willing to share any information on wages for workers sewing the clothes. In addition, none of the companies have a strategy for how to increase factory wages, even though low wages have been a well-known problem for decades in the industry.

The lack of wage data transparency makes it impossible to assess whether wages are sufficiently high to cover costs for basic living needs such as food, education, housing, health care and savings for unforeseen events.

According to the United Nations (UN) Guiding Principles on Business and Human Rights, companies are expected to "know and show" that they respect basic human rights, such as paying a living wage.

Fair Action believes it is time to deliver.

TRANSPARENCY IN ONLINE FASHION

Over the course of the pandemic-struck past year, online sales in Sweden have exploded. As the coronavirus restrictions have ushered us away from physical stores to online platforms for anything from groceries to apparel and footwear, companies well-equipped for this transition have rapidly been able to gain new market shares.¹

By the end of the first quarter of 2021, the change in shopping habits had led to an increase in e-trade sales of 53 percent compared the year before. Apparel and footwear retailers alone had increased their sales by 34 percent.²

However, the trend is not new. Over the last decade, there has been a steady increase in online sales. In 2020, the online fashion trade had a turnover of 1,5 billion EUR (15 billion SEK), equivalent to a market share of 30 percent of the Swedish total fashion sector,³ while in 2010, the turnover for garment and footwear was 0.55 billion EUR (5.5 billion SEK).⁴

Many of the brands involved in the eCommerce business have been growing fast. According to the company itself, Swedish brand NA-KD was one of the fastest growing companies in Europe in 2019.⁵ Stronger, another fast-growing eCommerce brand, founded as late as 2013, stated earlier this year that it aims for an annual turnover of close to one hundred million EUR by 2022.⁶⁷

Fair Action argues that with the power that comes with financial muscle and strong influence over consumers, these brands have a particularly important role to play in the development of a sustainable and transparent fashion industry.

To transform the fashion business into an industry where factory workers can make a decent living off their wages, raise their collective voices through free, independent unions, and where the footprint of the fashion industry on our planet is minimized, transparency in the supplier chain plays a key role.

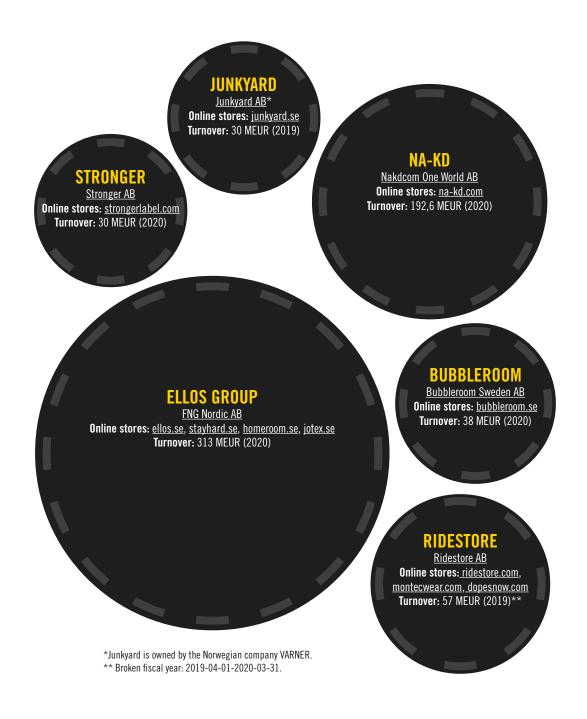
Fair Action, along with many trade unions, factory floor workers, industry initiatives, and other civil society organisations around the world, have long emphasized how crucial it is to have increased transparency in the supply chain in order to enable local unions, factory management, and buying brands to work together for improved working conditions. Furthermore, mapping average wages has been identified as one of the first important steps towards ensuring fair living wages for factory workers. Being transparent about this data should be central to any credible corporate accountability program. 9

The companies also have a responsibility for their impact on the human rights of the people making their products, as set out in the UN Guiding Principles on Business and Human Rights.¹⁰

In this report we have asked six Swedish eCommerce fashion brands about transparency in their supply chain. Our questions are, how much knowledge do they have about where and how their clothes are produced, and are they willing to share the details of this production?

We have also asked whether they have a policy on living wage and if they are willing to share information about the wages of the men and women sewing the t-shirts and trousers sold to consumers in Sweden and abroad.

The companies surveyed in this report are: **Ellos Group, Junkyard, NA-KD, Bubbleroom, Ridestore, and Stronger**.



SHARING IS CARING - WHY TRANSPARENCY MATTERS

When fashion brands open up about where their clothes are made, it is a "win-win" situation, with upsides for garment workers, the fashion companies and the consumers.

The benefits for workers

For garment workers and trade union representatives, information that link factories to international brands is crucial. For example: if a trade union leader is dismissed from a factory because of his or her trade union engagement, if garment workers do not get wage paid in time, or if a work-related accident occurs, they can raise the issue with the retailers buying from the factory only if they know their names. After the Rana Plaza building collapse in Bangladesh in 2013, that killed over 1,100 workers and injured more than 2,000, the only way to hold brands accountable was to interview workers and to search in the rubble to find brand labels and logos.¹¹



When implementation of local labour law is not working well enough and/or international law does not hold companies accountable for human rights violation within their supply chain, transparency is an important tool for workers and trade union representatives to get remedy and economical compensation.

"In the mind of the workers they do not know who their primary employers are, the brands are their real employers,"

says Parvathi Madappa, program officer garment sector, at the non-governmental organisation Cividep India.

"Without the brands, no work,"

Parvathi continues.



Babul Akhter, secretary general of Bangladesh Garment and Industrial Workers Federation, shares the view that buyers have significant influence:

"Factory owners only listen to brands. If we file a complaint to the labour court, it could take three to four years to get a decision. If we go through a brand it can be solved within a week." 12

Disclosure of suppliers can also be useful for trade unions when they plan where to organize. They can then prioritize to organize workers at workplaces where they know that one or more of the buying companies are committed to promoting freedom of association in the supply chain. If they face threats or dismissals from the employer, they can raise the problems with the buyer.¹³

A report by the International Labor Rights Forum on worker-led strategies for corporate accountability in the garment industry found that public reporting and disclosure of factories and working conditions are central for ensuring that workers' rights are respected. The study also shows that transparency is fundamental for initiatives that have achieved improvements of working conditions such as the Bangladesh Accord on Fire and Building Safety and the Indonesia Protocol on Freedom of Association.¹⁴

Under the Indonesia Protocol on Freedom of Association, signatory brands share their list of suppliers with a committee that monitors the implementation of the protocol. The committee consists of trade unions, manufacturers and brands.¹⁵

The Transparency Pledge

A global coalition of nine trade union federations and human rights organisations have developed the Transparency Pledge and are campaigning for all apparel and footwear companies to adopt this. The objective of the Transparency Pledge is to help the garment industry reach a common minimum standard for supply chain disclosures by getting companies to publish standardized, meaningful information on all factories in the manufacturing phase of their supply chains.

The Transparency Pledge require companies to publish the company's manufacturing sites. The list should be published on the company's website, be updated on a regular basis and include:

- The full name of all authorized production units and processing facilities (processing factories include printing, embroidery, laundry, etc.).
- The site addresses.
- The parent company of the business at the site.
- Type of products made (apparel, footwear, home textile, accessories).
- Worker numbers at each site (by category: less than 1,000, 1,001 to 5,000, 5,001 to 10,000, more than 10,000).

The information should be published in a downloadable, machine-readable file at a regular common frequency in one or more of the following formats: csv, json, or xlsx.²¹

The business case for transparency

However, greater and better transparency is not only in the interest of the garment workers. Fashion companies also have a lot to gain from revealing more information about their supply chain. Recent research finds that "businesses enjoy better reputation, greater operational efficiency, improved legal compliance and increased access to capital when they adopt greater supply chain transparency measures.¹⁶

Sharing information with stakeholders opens up opportunities for joint solutions that can increase the impact of brands' efforts to improve working conditions in the supply chain. If trade unions and non-governmental organisations can alert brands to problems at their suppliers, the issues can be solved quickly before it leads to negative publicity or production stoppage.

In addition, company investors often urge companies to reveal more information about their supply chain: The Corporate Human Rights Benchmark (CHRB) has gained support from many investors. Among other things, the CHRB scorecard assesses whether companies map their suppliers and disclose the mapping publicly.¹⁷ Internationally, Adidas, Levi Strauss, Nike, Patagonia and Puma have been front-runners regarding disclosing information on their supplier factories during the last decade.¹⁸

of consumers within the EU think fashion brands should disclose their manufacturers.



Who made my clothes? Consumers want to know

There is also a strong demand from consumers for more information about where and how clothes are made: 80% of consumers within the EU think fashion brands should disclose their manufacturers and almost as many (77%) think that fashion brands should publish which suppliers they use to source the materials used in their clothing. Two out of three consumers say it is very or somewhat important for fashion brands to share detailed information about wages and working conditions in the supply chain.¹⁹

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International standards on supply chain transparency The United Nations, and national laws in some countries, 22 urge companies to perform better on supply chain transparency. According to The UN Guiding Principles on Business and Human Rights, companies should "account for how they address their human rights impacts, business enterprises should be prepared to communicate this externally," and their communications should "be of a form and frequency that reflect an enterprise's human rights impacts and that are accessible to its intended audiences." The OECD Due Diligence guidelines for Garment and Footwear Supply Chain also emphasize the importance of communication and disclosure of information by garment brands. 24

The sustainable development goals – for a better world

Through the Sustainable Development goals, the world leader agreed on a common approach to end poverty, fight inequality, and stop climate change.

Goal 1, aims at ending poverty, in all its forms and everywhere. Following the severe consequences of the coronavirus pandemic for millions of factory workers, target 1.5, which is to build the resilience of the poor and reduce their exposure and vulnerability to economic and social shocks and disasters stands out as particularly relevant.

Goal 8, "decent work and economic growth," specifically outlines the need to "protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment" in target 8.8.

Goal 17, "partnership for the Goals," underlines the importance of a stronger commitment to partnership and cooperation from all actors, including multi-stakeholder partnerships. Thus, the business sector has an important role to play in achieving the Global Goals.



RECOMMENDATIONS TO THE BRANDS

Fair Action's recommendations to the brands are in line with United Nations Guiding Principles on Business and Human Rights, the Sustainable Development Goals,²⁶ and the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.²⁷

As a minimum: Commit to the Transparency Pledge

Publish the company's manufacturing sites. The list should be published on the company's website, be updated on a regular basis, and include:

- The full name of all authorized production units and processing facilities (processing facto ries include printing, embroidery, laundry, etc.).
- The site addresses.
- The parent company of the business at the site.
- Type of products made (apparel, footwear, home textile, accessories).
- Worker numbers at each site (by category: less than 1,000, 1,001 to 5,000, 5,001 to 10,000, more than 10,000).
- The information should be published in a downloadable, machine-readable file at a regular common frequency in one or more of the following formats: csv, json, or xlsx.

Disclose information about suppliers beyond the first tier

When in line with The Pledge, expand transparency beyond the cut-make-trim manufacturing phase to other aspects of the supply chain, including manufacture of yarn, fabric, and other inputs, and the production of raw materials like cotton and leather.

Provide data in formats that can be used in a searchable database

Use new technologies including the tools from the Open Data Standard for the Apparel Sector (ODSAS), to improve data formats and update more frequently as supply chain tracking technology evolves. ODSAS has developed an Open Apparel Registry; a tool for brands to upload supplier lists to assign each factory a standard factory identification number.²⁸



Communicate detailed information on wages in the supply chain

As outlined by the Supply Chain Transparency Project, developed in 2020 by Frank Bold along with over 30 supply chain experts to build a consensus on meaningful supply chain reporting requirements, wage data is a central part of what companies should communicate to the public. This includes mappings of a gender pay gap and living wage gap, including details on the calculation methodology adopted.²⁹ In the Road Map to a Living Wage, the Clean Clothes Campaign identifies a publicly available living wage strategy with time-bound goals and key steps towards long term and sustainable payment of living wage.³⁰

Answer questions from stakeholders

Whether inquires come from trade unions, journalists, NGOs, or other relevant stakeholders, give an accurate and clear response. Audit and investigations reports, corrective action plans of their suppliers and the grievances raised against them and how those grievances were addressed should be available to workers and to the public.

Provide more social and environmental information to consumers

Surveys show a strong demand of greater transparency from European consumers. To be able to make more sustainable choices, consumers need more information from companies. According to the OECD guidelines, information should be relevant, current, accessible and user-friendly.³¹

RESEARCH METHODOLOGY

During spring 2021, we sent a questionnaire regarding supply chain transparency to six Swedish brands. The brands were selected on the following criteria:

- Focus on eCommerce fashion.
- Presence of private labels (clothes).
- Sales turnover.
- Relevance for target audience in social media.

Prior to publishing this report, all brands had the opportunity to fact check the information concerning their own survey responses.

The interview with Babul Akhter, secretary general of Bangladesh Garment and Industrial Workers Federation, was carried out during a visit to Sweden in June 2019. The interview with Parvathi Madappa from the non-governmental organisation Cividep India was conducted in Bangalore, India in September 2019. The interview with Dee Lee at Inno Community Development Organisation was conducted in May 2021.

THE RESULT

- SORING SALES, BUT SHORTFALLS IN TRANSPARENCY

Three out of six transparent about suppliers

The survey shows that out of the six companies under scrutiny in this report, three, NA-KD,³² Ellos Group,³³ and Bubbleroom,³⁴ have publicly available information about their supplier factories and their location on their websites. Ellos Group, however, adds that the supplier list only includes suppliers of textile and garments and not their suppliers of footwear, furniture, and home decoration.

Have the brands made their supplier list public?



The other three companies, Junkyard, Ridestore, and Stronger, have committed to publish their supplier lists during 2021.

While it is clear that there is a positive shift in the willingness among garment companies to publish supplier lists,³⁵ it is also clear that many brands still need a nudge in the right direction. For instance, Bubbleroom, which had not published any information at the beginning of this year, were quick to announce that they would publish their lists when approached by Fair Action in connection with this report. Furthermore, Stronger chose to announce their commitment only days before the release of this report, and Ellos Group, which stated already in 2019 that they would publish their supplier lists "by the end of 2019 or early 2020," did not act on their commitment until April 2021.³⁶

In addition, the information is often published in file formats that are difficult to use, and lack information required by the Transparency Pledge, such as information on the parent company of the supplier. This makes it difficult to compile databases and to search within them for relevant linkages between factories and buying brands when needed. Fair Action emphasizes the need for companies to carefully follow the recommendations outlined in the Transparency Pledge with reference to both details on file formats and information details in supplier lists.

Have the brands made their wage data public?



Committed to publish 2021



No information on wages

When looking at publicly available information on living wages for factory floor workers, the survey responses are disappointing. None are transparent with the average wage for workers employed at manufacturing factories, and none plan to publish this information in the foreseeable future. The lack of public wage data hinders the assessment of an eventual gap between actual wages and living wages. According to the UN Guiding Principles on Business and Human rights, companies have the duty of "knowing and showing" that they respect fundamental human rights.

Furthermore, none of the companies have a living wage strategy.



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APPENDIX: FULL COMPANY RESPONSES

Information about suppliers

Based on company responses as of April 2021.

Company and private labels	Production countries (% of total purchasing value*)	Public supplier list (Yes/No)
Ellos Group (FNG Nordic AB) Ellos, Jotex, Stayhard, Studio Total, Áhkká,Adrian Hammond, Kvarn, Sons of Owen, Speechless, Willi- am Baxter, Agnes Cecilia, Pure, Milly & Will	China (49%) Bangladesh (17%) India (15%) Pakistan (7%) Turkey (2,3%) EU (7,4%) Other (2,3)	YES**
Junkyard AB (Varner AS) Junkyard, Junkyard Market, Junkyard Skateboarding, SWEET SKTBS, District 46, Yoke, Cava	Turkey (69,5%) China (22,5%) India (6%) Canada (2%) (figures for 2019)	NO, but committed to publish by the end of 2021
Nakdcom One World AB NA-KD	China (54,9%) Turkey (39,4%) India (2,6%) Bangladesh (2%) Portugal (0,5%) Taiwan (0,2%) Poland (0,2%) Pakistan (0,2%) Vietnam (0,1%) Italy (0,1%)	YES
Bubbleroom AB Alexandra Nilsson x Bubbleroom, Bubbleroom, Bubbleroom Sport, Happy Holly, Chiara Forthi, Chiara Forthi Resort, Moments New York, Make Way, Martina Lunde x Bubbleroom, Moa Mattsson x Bubbleroom, Nicole Falciani x Bubbleroom, Sandra Willer x Bubbleroom, Sara Sieppi x Bubbleroom, 77thFLEA	China (61,5%) Turkey (16,7%) India (15,4%) Pakistan (4,4%) Bangladesh (2%)	YES
Ridestore Dope, Montec	China (98%) Taiwan (1%) Sri Lanka (0,2%) Vietnam (0,8%)	NO, but committed to publish by the end of 2021
Stronger Stronger	China (88%) India (5%) Turkey (5%) Vietnam (2%)	NO, but committed to publish by the end of 2021

^{*} Rounded off to one decimal place.

 $^{{}^{**} \, \}text{Supplier list only includes manufacturers of textile and garment and exclude footwear, furniture and home decoration.}$

Information about wages in the supply chain Based on company responses as of April 2021.

Company and private labels	Public living wage strategy (Yes/No)	Public data on wage in supply chain (Yes/No)
Ellos Group (FNG Nordic AB) Ellos, Jotex, Stayhard, Studio Total, Áhkká, Adrian Hammond, Kvarn, Sons of Owen, Speechless, William Baxter, Agnes Cecilia, Pure, Milly & Will	NO	NO
Junkyard AB (Varner AS) Junkyard, Junkyard Market, Junkyard Skateboarding, SWEET SKTBS, District 46, Yoke, Cava	NO	NO
Nakdcom One World AB NA-KD	NO	NO
Bubbleroom AB Alexandra Nilsson x Bubbleroom, Bubbleroom, Bubbleroom Sport, Happy Holly, Chiara Forthi, Chiara Forthi Resort, Moments New York, Make Way, Martina Lunde x Bubbleroom, Moa Mattsson x Bubbleroom, Nicole Falciani x Bubbleroom, Sandra Willer x Bubbleroom, Sara Sieppi x Bubbleroom, 77thFLEA	NO	NO
Ridestore Dope, Montec	NO	NO
Stronger Stronger	NO	NO

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Promoting responsible business