



RECYCLED MATERIAL SOURCING POLICY

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SCOPE

The scope of the policy covers textile materials used in all Clothing & Home areas for main fabrics, linings and filling. The requirements of the policy should to be applied to componentry where possible.

The policy does not cover the use of recycled material for packaging or recycled wood.

This policy is a general overview of recycling and is supported with additional specific guidance documents for individual material types, such as cotton, wool & cashmere, polyamide and polyester.

BACKGROUND

The use of recycled textile material in lieu of virgin material is recognised as an important way to reduce the environmental impact of the finished product. At the same time, including recycled materials from taking back our own products can present exciting opportunities to secure raw materials and keep them in circulation for longer.

RATONALE AND OBJECTIVES

The rationale and objectives for this policy are:

- To ensure M&S improves the environmental impact of its main raw materials
- To lay out a set of uniform principles around the inclusion of recycled materials into product that will need to be adhered to by all business units consistently
- To ensure due diligence is undertaken with regards to the provenance of recycled materials and that they are being sourced ethically
- To ensure M&S can substantiate any marketing claims for product with recycled content in accordance with existing standards

M&S MANDATORY PRINCIPLES FOR SOURCING PRODUCT CONTAINING RECYCLED MATERIALS

All product containing recycled material must adhere to the following principles:

1. Recycled material is used **in lieu** of virgin material.
2. Marks & Spencer aspires to have all recycled material from certified post-consumer waste wherever possible. If this is not possible, certified pre-consumer (post-industrial) is also acceptable.
3. Recycled material must have been originally destined for disposal. Disposal is either sending to landfill or incineration without energy recovery.
4. The source of the waste and its subsequent processing route must be identified and assessed before approval as a Marks & Spencer recycling route. See [Appendix 2](#) for the mandatory due diligence process.

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- All products made from recycled material must comply with the Marks & Spencer standards for quality, safety, chemical compliance, and relevant legislation (such as RSL, MRSL, ECP, ZDHC, etc).

MAIN FABRICS & FILLING

For main fabrics and filling, the material must be certified to one of the below standards:

- GRS or RCS certified with full chain of custody up to Marks & Spencer**
- GRS/RCS certification is not required if the recycled material contains inherent traceability that can measure not just the presence or absence of recycled material but also the percentage quantity.**

Currently M&S accepts the branded Repreve fibres from UNIFI and if used they must have an approved UNIFI U-Trust certificate – see section REPREEVE FROM UNIFI. Any other traceable recycled materials must be approved by M&S Clothing & Home Plan A team.

LINING

For recycled linings, these additional criteria must be followed:

- Lining must be GRS, RCS or Repreve from UNIFI certified with full chain of custody up to Marks and Spencer, in line with mandatory principles for main material and filling**

OTHER COMPONENTS

- Components with recycled claims must be certified to either RCS or GRS standards**

DEFINITIONS*

**All definitions are based on the GRS and RCS standards.*

Post-Consumer Material: Material generated by households or by commercial, industrial, and institutional facilities in their role as end-users of the product that can no longer be used for its intended purpose. This includes returns of materials from the distribution chain.

Examples:

- Down from a previously owned down jacket or duvet
- Garments collected and shredded into raw fibre

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Pre-Consumer Material: Material diverted from the waste stream during the manufacturing process. Excluded is the reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.

Recycled Material: Material that has been reprocessed by means of a manufacturing process and made into a final product or into a component for incorporation into a product.

Waste collected from one step of a production stage that is put back into the same production stage shall not be considered Recycled Material.

Both chemically and mechanically Recycled Material qualify.

Remake or Reuse is Reclaimed Material that does not undergo an additional step before being used again.

ACCEPTABLE SOURCES OF RECYCLED MATERIAL

In accordance with the above definitions, these are the acceptable sources of recycled materials for M&S product, in order of preference:

- 1) Certified* post-consumer recycled materials, such as:
 - Post-consumer textiles (for example, collected via the Shwopping programme)
 - Post-consumer man-made materials from other sources (PET bottles, fishing nets, carpet waste, ocean and terrestrial plastic waste etc)
- 2) Certified* pre-consumer recycled materials, such as:
 - Factory off-cuts (e.g. from CMT suppliers)
- 3) M&S excess stock garments

*See [Appendix 5](#) for Certifications clarifications

Not acceptable sources of recycled materials (see [Appendix 1](#) for full list):

- 1) Spinning mill waste or noils. This exclusion is in accordance to ISO 14021 definition of Recycled Content, as well as GRS/RCS definitions. Noils and spinning waste can be used in garments, but are not to be declared as recycled material.
- 2) Uncertified recycled or materials that are not traceable to the original source.

COMPLIANCE & LEGAL STANDARDS

Products made from recycled material must comply with all Marks & Spencer standards. The use of recycled material can lead to specific risks around safety, chemical compliance and fibre composition legislation.

SAFETY & CHEMICAL STANDARDS

Waste material can contain chemical residues and contamination from previous processing and/or use. Precautions must be taken to minimise these risks and ensure compliance to the appropriate chemical and safety standards. Detailed risk assessment must be carried out for

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each recycling route and any appropriate due diligence chemical testing should be conducted. Further details on the risks associated with different material types can be found in the policy documents for each specific material type.

COMPOSITION

The use recycled material can lead to variations in the fibre composition of fabrics and products. Marks & Spencer can be prosecuted if the product composition is found to be misleading. Therefore, the consistency of fibre composition must be assessed during the development process and action taken to minimise the risk of prosecution. Testing composition for every production batch may be the only secure solution.

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APPENDIX 1

Pre-consumer accepted materials

Pre-consumer materials can be use if the below criteria are met:

- a) The producer has not deliberately chosen to produce them. This implies that the material originates from a production process whose primary purpose is not its production itself;
- b) the material cannot be used directly without further processing;
- c) the material is not ready to be used in the same production process.

COTTON

Acceptable	Not acceptable
Roving waste; carding waste, provided it is regenerated	Combing scraps; flat strips; speed frame waste and rovings
Fabric off-cuts, selvedge, weaving scraps	

WOOL

Acceptable	Not acceptable
Yarn	Noils, combing waste, laps
Selvedge, weaving waste, fabric off-cuts, fabric mill waste, knitwear off-cuts from overlocking	
Rags, loops	

GLOSSARY

Noils	Short fibers discharged during the combing process. They are very valuable and can be directly used for producing goods which can be labelled as "virgin wool"	NO
Re-combing waste	Discarded fibres in the re-combing of wools that have been previously dyed. They are dyed, clean and of good quality	NO
Laps	Fibres discharged from tops and roving bobbins due to accidental stop of machines in operation. Are normally long fibres which can be directly re-introduced in the spinning process.	NO
Yarn waste	Portions of yarns discarded along the spinning process. They are normally twisted and cannot be directly used in the carded spinning cycle. Before usage they must pass through an opening stage in order to newly obtain fibres.	YES
Selvedge	These are the portions of fabric that are discarded on both sides of the fabric by modern weaving machines. In addition to being made of twisted yarns, they are also intertwined even though the weave is not very tight and has not undergone finishing.	YES
Weaving and fabric waste	They are small pieces of limited length that must undergo sorting operations before the regeneration.	YES
Cutting waste	They are small portions of fabric that come from the cutting process that must undergo sortation before the regeneration	YES
Knitwear waste from overlocking	Small pieces of knit fabric that result from garment construction of knitwear fabric with on overlocker. They need sorting before regeneration.	YES

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APPENDIX 2**Recycled Material Sourcing Due Diligence****OVERVIEW**

In order to ensure adherence to this Policy, departments and Sourcing offices must undertake the necessary due diligence to understand and verify the chain of custody for the recycled material included in the products M&S brings to market

The aim of the chain of custody is to preserve the identity of the claimed material, and to track its movement through the supply chain up to the final product. This is done through Scope Certificates (SC) and Transaction Certificates (TC).

Suppliers must provide:

SCOPE CERTIFICATE (SC) – Shows that a supplier is qualified to produce under the certification.

It is the responsibility of the Department Technologist to ensure that no order is placed without reviewing the Scope Certificate of the factory where the garments will be produced, and that the respective unit is certified for the product that is being sourced.

If the order is under 5,000 units per year from a single production unit, the Departmental Technologist and/or Sourcing Office must request the scope certificate of the fabric mill before placing an order. The Garment Maker/Product Manufacturer must then sign and submit a Declaration of Conformity for recycled materials (they are not required to become GRS or RCS certified)

TRANSACTION CERTIFICATE (TC) - Shows that the products shipped contain recycled materials.

A blanket Transaction Certificate may be issued for up to 100 shipments within a maximum of 3 months and it is not required to have individual TCs for each transaction.

If the order is under 5,000 units per year from a single production unit, the Garment Maker/Product Manufacturer must sign and provide a Transaction Certificate for Non-certified suppliers. It is mandatory that the quantity of recycled material is declared on this document and that it is checked by the Sourcing Office/Departmental Technologist

If certification claims are to be made (and include GRS or RCS logos), there must be a full chain of custody with scope and transaction certificates all the way to Marks & Spencer.

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APPENDIX 5

RECYCLED STANDARDS COMPARISON

RECYCLED MATERIALS STANDARDS

[Global Recycled Standard \(GRS\)](#) is a chain of custody standard to track recycled raw materials through the supply chain. It is an international, voluntary, full product standard that sets requirements for third-party certification of Recycled Content, chain of custody, social and environmental practices, and chemical restrictions. The goal of the GRS is to increase use of Recycled materials in products and reduce/eliminate the harm caused by its production.

The Global Recycled Standard is intended for use with any product that contains at least 20% Recycled Material. Each stage of production is required to be certified, beginning at the recycling stage and ending at the last seller in the final business-to-business transaction. Material Collection and Material Concentration sites are subject to self-declaration, document collection, and on-site visits.

The GRS does not address quality or legal compliance.

[The Recycled Claim Standard \(RCS\)](#) is intended for use with any product that contains at least 5% Recycled Material. Each stage of production is required to be certified, beginning at the recycling stage and ending at the last seller in the final business-to-business transaction. Material Collection and Material Concentration sites are subject to self-declaration, document collection, and on-site visits.

The RCS does not address social or environmental aspects of processing and manufacturing, quality, or legal compliance. Please note that only if you wish to use RCS or GRS in messaging/marketing (including the respective logos) you must follow the below guidelines and comply with the GRS/RCS logo use and claims guide

	GRS	RCS
Applies to:	<ul style="list-style-type: none"> Individual product (not facilities) 	
Chain of custody	<ul style="list-style-type: none"> All actors must be certified from the recycler up to the CMT facility They need to prove ability to segregate recycled materials from non-recycled materials in the production process 	
Minimum recycled content	<ul style="list-style-type: none"> 20% minimum recycled content in the finished garment 	<ul style="list-style-type: none"> 5% minimum recycled content in the finished garment
Additional requirements	<ul style="list-style-type: none"> The production units (factories) must be audited and pass environmental, ethical (in line with ILO standards) and chemical audits 	<ul style="list-style-type: none"> No production unit level audits, other than those to ensure segregation for the chain of custody
Labelling	If using GRS/RCS marketing or messaging (including logo use);- Must have full unbroken chain of custody to allow labelling on final product, incl. scope and transaction certificates up to retailer for each specific product.	

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