

Dear Frank Egleton

We have read all of the reports by Brian Leveson on the Boohoo website. We feel that neither the reports nor your response to our letter contain sufficient evidence to dispel our concerns regarding Boohoo Group's ethical and environmental standards. The auditing processes and supplier expectations you reference are relatively standard in the industry today, yet garment production remains rife with human rights abuses. Once more we ask, do you have proof that these auditing processes are working? Do you have proof that you intend to make structural changes to your business model, provide full transparency or ensure the wellbeing of workers at *all* stages of the supply chain? If not then we can only assume that exploitation remains present in your supply chains and that Boohoo Group have simply become better at concealing this fact, after being publicly shamed into addressing the labour rights abuses taking place at garment factories within its UK supply chain.

To directly respond to your comment on loss leaders, we feel it is necessary to clarify that it is the sheer quantity of clothing on your website that is sold at exceptionally low prices that is deeply problematic. Many of us have studied fashion or worked in the industry and fully understand the concept of loss leaders. Firstly, we argue that the constant use of sales and discounts are demonstrative of overproduction. It would simply not be necessary to continually run sales if production was scaled back to a responsible rate. Pretty Little Thing does not use sales and discounts in moderation, as a means of selling end of line garments that would otherwise remain unsold. At the time of writing, there are 25,066 items on sale on Pretty Little Thing, with only 174 of these over £50. With loss leaders being used on this scale, we fail to understand how that cost is being absorbed fairly. It is also important to point out that even the pre-sale price of PLT garments is low enough to raise questions about the quality, sustainability and ethics of each item. We would like to stress again that these consistently low prices and enormous volumes were previously exposed as reliant on the social injustices within your supply chains. Surely, if both UK and international supply chain practices had been significantly reformed since the 2020 Labour Behind the Label exposé then it would have been necessary to raise prices and lower production quantities. Therefore, our question remains how can you consistently sell vast quantities of clothing at such low prices whilst ensuring that living wages and safe working conditions are provided for workers throughout PLT supply chains?

In addition, XR Fashion Action feels that constant sales and price reductions - when employed as an integral part of a brand's business model - need to be abandoned in order to allow the transition to a truly sustainable and ethical fashion model. You freely admit that you sell items at prices lower than their material worth to actively encourage consumption. Sales and discounts, especially of the extremity that we see from PLT, are designed to generate impulse buys. Shoppers can indulge in fashion without considering whether or not they need or even really desire the garment because it's only costing them pennies. This practice perpetuates the dangerous notion that clothing is disposable and of little worth, a social attitude that is resulting in mass overconsumption and presenting huge social and environmental issues. For example, thousands of tonnes of barely worn, mostly synthetic clothing, like that produced by Pretty Little Thing, is ending up as [colonial textile waste](#). It is this cycle of overproduction, overconsumption and disposability which is causing the fast fashion industry to push our planetary boundaries past the point of collapse whilst also sustaining social injustice.

Whilst we have your attention, we would also like to address some of our key sustainability concerns with you. As I am sure you are aware, environmental justice is inextricably linked to social justice. Unsustainable manufacturing methods such as over-farming, chemical pesticide use and water pollution, all have huge impacts for communities whose indigenous lands are being polluted and degraded and their resources depleted. It is deeply concerning to us that in the 'sustainability' section of Brian Leveson's final report - which consisted of only three points and less than one A4 page - the only issues addressed were textiles waste management and energy efficiency.

The 'sustainability' page on the Pretty Little Thing website does not demonstrate any significant commitment to achieving true sustainability. The language used on this page is noncommittal, vague and therefore mostly likely

intended to mislead shoppers. For example, a statement like ‘all of the materials we use will be more sustainably sourced [by 2030]’ contains no details or specifics and as a consequence, means very little. In other words, this statement could also mean ‘all of the materials we use will be slightly less harmful than they currently are’. **‘More sustainably sourced’** does not mean ‘sustainably sourced’. It seems very likely that these vague commitments towards environmental progress are little more than greenwashing tactics, designed to dupe consumers into believing that Pretty Little Thing is an ethically and environmentally conscious brand, which is very clearly not the case.

Another misleading marketing tactic is Pretty Little Thing’s intention to advertise cotton garments using the Better Cotton Initiative. The website states that ‘this will not appear on product until 10% of all cotton is sourced through BCI’. However the website also states that ‘Better Cotton is not traceable to end products. However, BCI farmers benefit from the demand for Better Cotton in equivalent volumes to those we source.’ Reading between the lines, this suggests that Pretty Little Thing intends to advertise cotton garments with a BCI claim even though there may not actually be any organic cotton whatsoever in the garment. In fact, they will do so even though only 10% of the cotton in PLT’s supply chain is actually sourced through the Better Cotton Initiative. We ask you to clarify how PLT will be using these BCI statistics to promote cotton garments whilst making it completely clear to the consumer that the remaining 90% of the supply chain does not consist of BCI cotton. We also ask whether PLT has any future goals to reach 100% BCI approved cotton as this is not stated anywhere on the website. As I am sure you will agree, 10% is far from a sufficient end goal.

Unfortunately, PLT’s apparent commitment to increasing the use of recycled materials is also flawed. The PLT website directs shoppers to a clothes recycling app, however it does not state any commitment to transitioning to a closed loop system. If a garment is made from a blended or mixed material fabric it becomes very difficult to recycle. The PLT business model is to encourage the constant consumption of garments that are cheap and have a short lifespan which presents a fundamental sustainability issue, despite garments consisting of recycled materials. A cheap dress made from a percentage of recycled polyester may be easy to market to consumers as a ‘sustainable’ choice but when the dress is discarded (usually after just a few wears) it will be almost impossible to recycle or process responsibly if it is made from mixed materials. Sustainability ‘solutions’ such as recycling schemes are being used industry-wide in an attempt to deflect attention away from the key issue which is the fundamental unsustainability of mass producing cheap and disposable clothing.

Ultimately, genuine brand sustainability is impossible to achieve whilst operating a fast fashion business model. It is unsurprising that Alison Levitt found in her investigation that ‘commercial issues such as growth and profit were still considered to be a higher priority than supply chain supervision and scrutiny’. Cheap and rapidly produced garments, regardless of whether or not they are made from recycled or organic cotton, will continue to rely on the exploitation of both human and planetary resources. To echo the Labour Behind the Label report, we must all recognise that unethical working conditions are ‘not only the result of some unscrupulous suppliers but also an inevitable outcome of the current fast fashion business model’. No amount of supply chain audits can possibly remedy this.

Leveson’s reports contain many references to audits taking place throughout supply chains in the UK and in the rest of the world but much less emphasis on what action is being taken to resolve the shortcomings that surely must be being uncovered by these auditing processes. We have also found no reference to whether the results of these audits will be made public. We wish to remind you that Levitt’s Independent Review criticised an ‘overreliance on audit as the sole method of managing supply chain compliance’, as well as the lack of sanctions for non-compliance and ongoing monitoring to ensure that noncompliances had been remedied.

Although the publication of Boohoo Group’s international factory list is a step in the right direction, it cannot be considered full transparency. This list is meaningless to a conscious consumer seeking evidence that your supply chains are free of human rights abuses. The press release accompanying the publication of this list states that it is the result of an ‘extensive period of mapping and auditing’. If so, we call for the results of these audits to be made public in addition to the factory list. Leveson also refers to an RAG status being attached to each manufacturer in the supply chain, with

red signalling that urgent action is required, orange and yellow progress needed and green 'no issues of any sort'. This is the kind of data that needs to be available in the public sphere in order for actual transparency to be achieved, as a traffic light colour system is accessible to everyone. XRFA would like to know how many of the manufacturers fall into the amber categories and what action is being taken to follow up these failings.

In each of his reports, Leveson is quick to praise Boohoo Group's enthusiasm and commitment to its 'Agenda for Change' programme and the 'very real progress' that is being made. However, the reports do not contain any substantive evidence of this progress in the form of data or analytics. With all due respect, we cannot and will not simply take yours or Leveson's word for it that Boohoo Group are taking sufficient action to clean up their supply chains without any actual evidence of this. In the interest of supply chain transparency and in response to Pretty Little Thing's misleading response to backlash against the company's International Women's Day campaign on social media, we are asking that you **release a clear response to the question of how the brand intends to fully address the ethical and environmental failures in its supply chain whilst refusing to scale back their rate of production.**

So, see you around...

XR Fashion Action