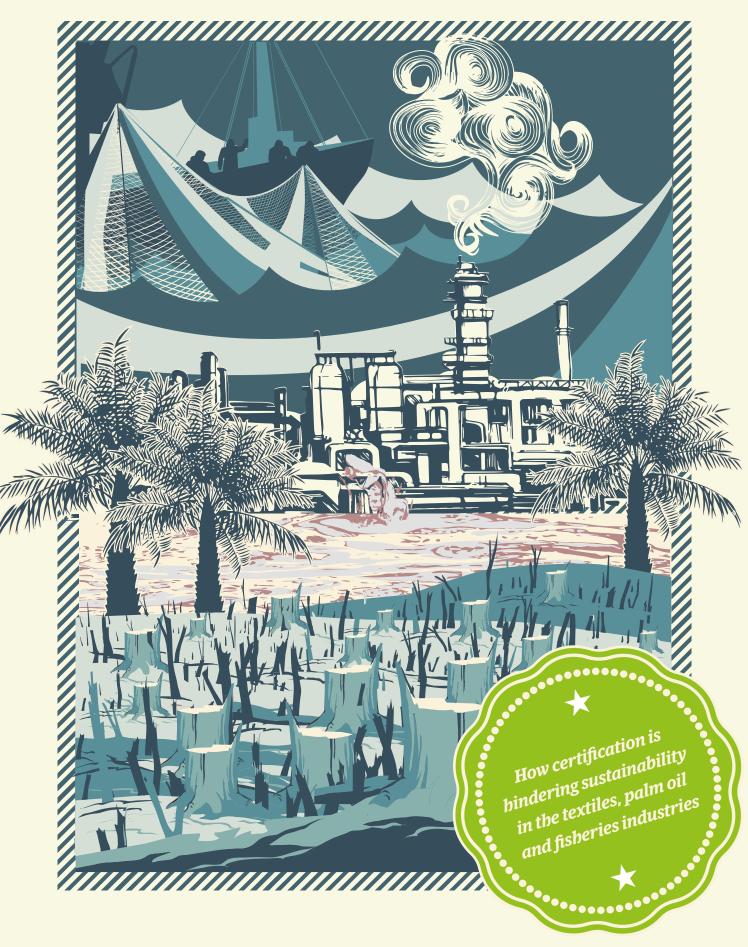
The false promise of certification



The purpose of this report is to shed light on industry-specific issues related to environmental impacts of certification schemes and voluntary initiatives in fisheries, palm oil and textiles sectors.

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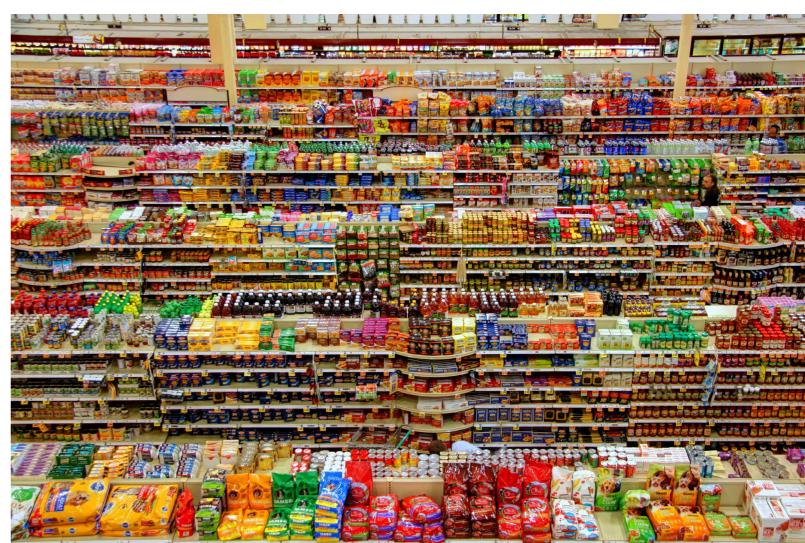
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Executive summary and key findings

1. Executive summary

Faced with the gravity of today's environmental and social Studies also show that many shoppers rely on labels and problems, consumers are increasingly seeking out sustaincertifications as a quick and easy way to identify more reable products that minimise negative impacts on people sponsibly made products without having to become supply and the planet. In 2015, a survey of 30,000 consumers in 60 chain experts (e.g. Nielsen, 2014). countries found that 66% of consumers are willing to pay As sustainability goes mainstream, more and more compamore for products or services from companies committed to nies are keen to show off their credentials by adopting difpositive social and environmental impact (Nielsen, 2015). In the UK alone, the market for ethical products grew to more ferent types of certification, labels and ethical commitments. than £81.3 billion in 2017, with demand for sustainable fish The number of different schemes and voluntary initiatives growing by nearly 37% in 2016 (Ethical Consumer, 2017). has grown exponentially in recent years. The Ecolabel Index,

The market for sustainable and ethical products is growing (credit- Peter Bond/Unsplash)



the largest global directory of ecolabels, currently lists over 460 labels in 25 different sectors (Ecolabel Index, 2018). Most of these have emerged in the past two decades. But are they any good? This report shows that, rather than being an accelerator for positive change, this 'flood' of certification creates confusion for consumers and the industry and is standing in the way of genuinely sustainable consumption.

We investigated voluntary initiatives in three sectors where growing consumption and unsustainable sourcing have caused serious environmental problems: palm oil, fisheries and textiles. Palm oil is one of the leading drivers of deforestation, greenhouse gas (GHG) emissions, forest fires and loss of habitat for charismatic and endangered species such as orangutans, elephants and rhinos. Industrial fishing has devastated the planet's oceans; nearly 90% of global fish stocks are either fully fished or overfished (FAO, 2016a). It is also a hugely wasteful industry. Nearly 10 million tonnes of good fish are thrown back into the ocean every year, while damaging fishing methods have wreaked havoc on ecosystems: gill nets commonly kill dolphins, porpoises and whales, longline fishing is a particular problem for birds and discarded fishing gear continues to kill sea life for many decades in what is called 'ghost fishing'. Last but not least, the textile industry uses one-quarter of the world's chemicals and has been blamed for 20% of industrial water pollution, making it the second biggest polluter of freshwater on the planet. Violations of human and workers' rights are also rife in all three sectors.

In the absence of effective national and international legislation to tackle these problems, and with increasingly globalised supply chains, voluntary schemes are seen as a convenient way to fill the gap. In this report, we analyse the context in which such voluntary initiatives emerge, what their role is and how they set out to address some of the challenges identified. We investigate an array of voluntary initiatives that provide a company, product or service with a sustainability endorsement, ranging from product labels to industry-wide initiatives aiming to improve the environmental performance of a sector as a whole. We review key schemes in each of the three sectors, evaluating how they work, their achievements and their failures. Our focus is mostly environmental issues, although in some cases we also look at reports on human rights violations.

This report comes at a time when many of these schemes are under pressure to reform from NGOs and scientists - and, in some cases, even progressive companies. But despite the fact that the tide is turning, there is still a massive push for certification - and not always for the right reasons. This report demonstrates that many of these schemes are being used as a cover, which makes it more difficult for NGOs and academics to question the sustainability of some products and companies. For example, McDonald's has used the Marine Stewardship Council (MSC) label to deflect criticism over the sustainability of the New Zealand Hoki Fishery, which has been criticised for its high discard levels and trawling methods (McGrath, 2016). Governments are also increasingly using schemes as evidence of sustainability, as demonstrated by the use of certified palm oil to comply with biofuels targets, despite doubts about its success in stopping deforestation. The following section presents the key findings of this report.

2. Key findings

2.1. Fisheries

In 2015, 14% of global seafood production was certified - up from only 0.5% nearly a decade earlier. Certified-sustainable wild catch accounts for 20% of global wild catch supply and has been growing ten times faster than conventional seafood production (Potts et al., 2016). This report focuses on two of the biggest schemes: Friend of the Sea (FOS) and the MSC, which certified over 9 million metric tonnes of fish in 2015. Other schemes are relatively insignificant in comparison. Both the MSC and FOS certification schemes cover the prohibition of destructive fishing techniques, management of by-catch, environmental risk, impact assessment and the management of stock regulation, among other issues.

MSC and FOS were both found to be certifying numerous fisheries as sustainable - even when they overfished, had very high levels of by-catch and, in some cases, were even at odds with national legislation. The MSC has also been found to certify a number of fisheries in a 'compartmentalised' approach, which means a vessel and crew can use their nets to catch tuna 'sustainably' (receiving MSC certification), and then - on the same day and using the same equipment - haul in tuna along with protected species: a practice that is unsustainable and therefore non-certified. Although some certification experts (Froese and Proelss, 2012) say certified to reform the scheme, many dozens of NGOs sent a letter to seafood is still a better choice (because those fisheries are the MSC Board in January 2018, requesting that it deliver on more likely to reflect healthy, moderately exploited stocks commitments to finally make urgently-needed reforms to and to ensure labelled fish has not been caught illegally), both the standard and the certification process itself. The critics charge that the MSC system has compromised its aim is to re-establish MSC as a gold standard in seafood standards to keep up with booming demand from Wal-Mart¹ certification. Unless this happens within a short timeframe and other retailers. Booming demand for sustainable seafood, (the deadline given in the letter is the end of 2018), NGOs and the desire to meet it, are actively threatening the MSC's may be forced to recommend that the public, partner organcredibility, as there are not enough truly sustainable fisheries isations, producers and retailers move away from seafood to supply demand.² labels altogether (Ziegler, 2017). Until (and if) this scheme is reformed, consumers and restaurants need to find other FOS does not have much support from NGOs and the scientools to enable them to source genuinely sustainable fish tific community due to its lack of transparency and stakethat contributes to the long-term sustainability and health holder involvement; hence, it should probably be abolished. of the oceans and livelihoods connected to it.

MSC, which looks better on paper, has come under a lot of criticism from NGOs and scientists and is also losing credibility in the eyes of many retailers. In a last-ditch attempt

2 The MSC actually has a specific target: to make 20% of all wild caught fish MSC-certified by 2020, and 30% by 2030 (up from the current 12%).

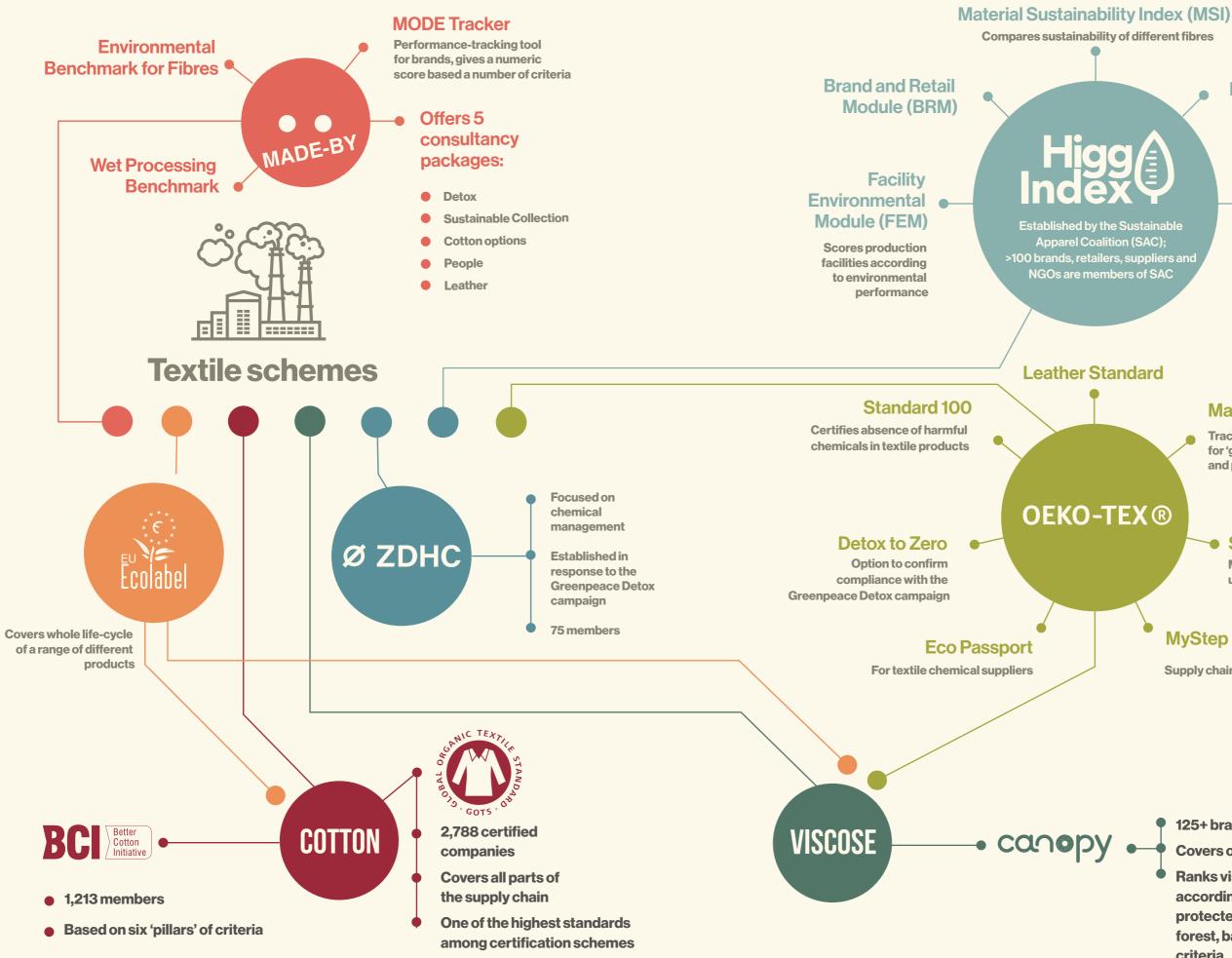


Wal-Mart committed to using only MSC-certified sources by 2011, but still hadn't fulfilled this commitment by 2015, due to lack of sufficient certified supply



⁽Potts et al., 2016)

OVERVIEW OF VOLUNTARY INITIATIVES ANALYSED IN THIS REPORT





Design and Development Module

Made in Green

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Traceable product label for 'green' production and products

STeP

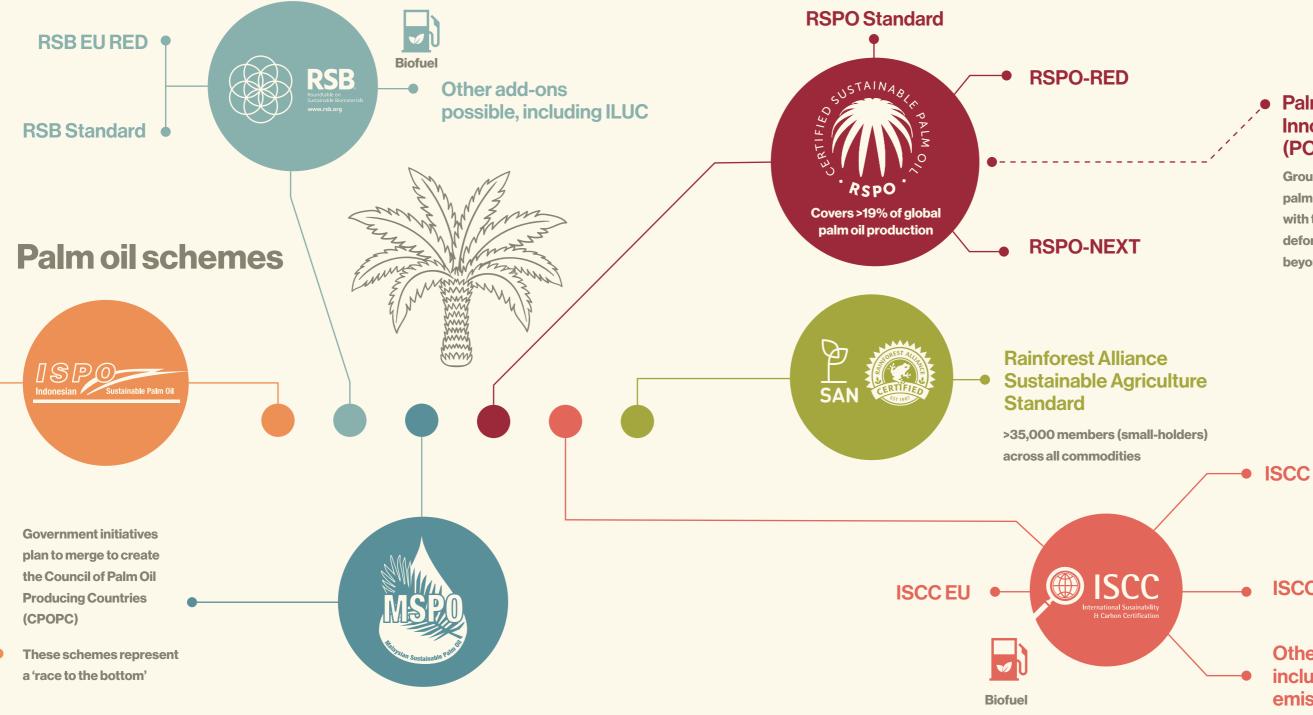
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Managing chemicals used in production

MyStep

Supply chain database

125+ brand partners **Covers only pulp sourcing Ranks viscose manufacturers** according to impact on protected and endangered forest, based on a range of criteria



Fisheries schemes

- Global coverage: 12% (2017)
- No. of fisheries certified: >300
- No. of companies committed to source certified seafood: >100







Palm Oil Innovation Group (POIG)

Group founded by NGOs and palm oil producers in 2013, with the aim of limiting deforestation by going beyond RSPO requirements

ISCC PLUS

Other add-ons possible, including GMO, GHG emissions

- Global coverage: 15% (2017)
- No. of fisheries certified: >500 (including aquaculture)
- No. of companies committed to source certified seafood: 27 retailers



Palm oil production is a leading cause of deforestation (credit-Ulet Ifansasti/Greenpeace)

2.2. Palm oil

Palm oil is now so common that is estimated to be present in half of all supermarket products (Amnesty International, 2016a). In addition, a third of all biodiesel burned in cars and trucks in the EU is now estimated to be palm oil (Transport & Environment, 2017). Since palm-oil cultivation is centred around tropical areas, it is in direct competition with tropical rainforests for land, and is one of the leading drivers of deforestation. Besides massive biodiversity loss, deforestation is also responsible for large amounts of GHG emissions. Indonesia alone, which is the largest palm-oil-producing country, is ranked second in the world for tropical deforestation; land-use change and peatland draining are responsible for 79% of Indonesian GHG emissions (WRI, n.d.). While Indonesia and Malaysia currently represent 85% of global palm-oil production, the plantations are quickly moving into new areas and countries, such as in Africa and Latin America, leading to similar problems there.

Founded in 2004, the Roundtable on Sustainable Palm Oil (RSPO) has become the most prominent voluntary palm-oil

certification scheme worldwide, now certifying 2.6 million hectares - or around 19% of global palm-oil production (RSPO, 2017). Since then, other certification initiatives in the palm-oil sector have emerged, leading to continuous growth in the amount of certified palm oil on the market. These include International Sustainability and Carbon Certification (ISCC) and the Roundtable on Sustainable Biomaterials (RSB), which mostly focus on palm oil used in biofuels, and the Rainforest Alliance (RA), which mostly focuses on sustainable agriculture. The Malaysian and Indonesian governments have also set up their own schemes: Malaysian Sustainable Palm Oil (MSPO) and Indonesian Sustainable Palm Oil (ISPO). ISPO certification, which is now a requirement for Indonesian plantations, has rapidly increased in recent years to cover 16.7% of all plantations, or 1.9 million ha (Indonesia Investments, 2017). However, as this report shows, ISPO represents a race to the bottom, as it merely requires compliance with already weak Indonesian legislation.

This report shows that none of the schemes has been effective at slowing down deforestation, peatland draining or the loss of biodiversity. While RSPO is often referred to as the

Sulfur pollution in village surrounding viscose factory, Indonesia (credit - Muhammad Fajar Fauzan)

best scheme in the sector, it has several shortcomings; most The report also reviewed the schemes set up by the Malaynotably, it allows the conversion of secondary forests and sian and Indonesian governments, which are now trying the draining of peatlands, it has not prevented human rights to merge their two schemes into one weak standard and violations and it does not require GHG emissions reductions. solidify it via trade agreements and cooperation with other All of the schemes investigated also have consistency issues: palm-oil-producing countries. This is a blatant effort to they offer numerous different standards within each scheme. 'greenwash' the sector and allow further expansion into These 'modules' have different levels of ambition (tailored to new areas, and is driven by continuing growth in demand the market of destination) and different traceability requirefor biofuels and processed food products. In light of this, ments (ranging from full segregation of certified products to we call for action to reduce demand for palm oil, such as just selling green certificates via trading platforms). RSB and ditching biofuels targets, as well as channelling new plan-ISCC have developed several modules, depending on which tations into non-forested areas by putting in place a strong biofuel market the company wants to sell to. In response to moratorium on palm-oil expansion to forests and peatlands. criticism, RSPO has developed a voluntary add-on module Most schemes in this sector should be abolished in light of called RSPO NEXT, which raises the bar on sustainability their failures on multiple fronts. by prohibiting peatland and secondary forest conversion. 2.3. Textiles The first 2,000 tonnes of this certified palm oil reached the market in February 2018, but were sold on the trading platform PalmTrace, which offers no traceability back to The textile sector has seen a proliferation of voluntary the source (RSPO, 2018). This lack of traceability is a major schemes and green labels - over 100 are listed in the Ecoproblem (and is criticised in this report) because it reduces label Index, and several other initiatives, such as the Higg the incentive for companies to take responsibility for their Index, are analysed in this report. Raw material sourcing, own operations further down the supply chain. manufacturing and processing of textiles are largely located

in countries with very low wages and weak environmental regulations, which has historically led to problems, ranging from environmental pollution with toxic chemicals to the exploitation of workers. This report focuses on schemes that set out to address the environmental performance of the textile industry as a whole, and at key schemes covering two fibre types: cotton and viscose. We found that, despite the proliferation of different initiatives, there is no overarching scheme that satisfactory addresses sustainability performance across the whole supply chain. The EU Ecolabel covers different types of textiles using a life-cycle approach - but in the case of viscose, it does not cover all parameters, notably water pollution indicators during the manufacturing of viscose fibres.

The Higg Index, which is widely used by fashion brands and counts several NGOs among its members, is often referred to as a key tool for improving the environmental performance of the sector as a whole. However, this report shows that it has many shortcomings; namely, a reliance on self-assessment and a lack of transparency, which would be a real incentive for fashion brands to continuously improve. While the Higg Index has promised full transparency by 2020, it remains to be seen how thorough this will be. A similar tool, MADE-BY's ModeTracker, also scores brands on their environmental and social performance - and suffers from incompleteness, allowing brands to pick and choose the areas on which they are assessed. This report also evaluates different types of OEKO-TEX Standards - not only the OEKO-TEX Standard 100 module, which deals with chemicals in the final product, but also the MADE IN GREEN and Sustainable Textile Production (STeP) modules, which deal with chemicals in the production process.

The report takes a closer look at schemes for cotton and viscose, based on the potential for these two fibres to be produced in an environmentally friendlier way. On cotton, it was found that a weak scheme - the Better Cotton Initiative (BCI), which allows for the use of toxic chemicals and genetically modified (GM) seeds - has grown very rapidly at the expense of organic cotton. A recent investigation broadcast on French television (Lucet, 2017), showed how BCI has overtaken organic cotton's market share and that farmers have switched from organic to GM cotton as a result of their participation in BCI. Even some well-intentioned and successful schemes (such as the CanopyStyle initiative, which addresses raw material sourcing in viscose production) can provide a misleading picture, because they only cover one part of the supply chain. As the Canopy initiative only covers the sourcing of wood pulp, but not the use of chemicals in the manufacturing of viscose, it can give companies that are continuing to pollute the environment an unjustified 'green glow' - which is then often used as a selling point with customers.

3. The way forward for certification

The main conclusion of this report is that certification has lost its way and that its contribution to creating a more sustainable world is minute. We argue that it can even cause active damage; it lowers the bar to certify higher product volumes and in many cases fails to enforce greater transparency, thereby providing cover for unsustainable companies and practices. If there is to be a role for certification in the transition to a sustainable economy, it must undergo some serious reforms. First of all, the majority of schemes in the three sectors examined here should be abolished, because they are leading to confusion and 'label shopping', which waters down the ambition of certification in general. Second, certification schemes should aim for the highest possible level of ambition - not develop different modules with differing requirements, based on their target markets and to satisfy different companies' priorities. Why has RSPO developed a voluntary add-on module (RSPO NEXT) to drive more sustainable practices, which will affect only a small share of supply, rather than prohibiting all expansion of palm oil to forested areas and peatlands? This piecemeal approach has to change.

The general problem with certification is that all these schemes come in the context of growing demand for commodities, as well as insufficient national and international regulation to protect the environment and safeguard human rights. These schemes also exist within the framework of globalised production and consumption, where complex and opaque supply chains often obscure relevant information and reduce the level of external scrutiny. Certification exists to address this problem, in part - but therein lies the problem: for all three sectors featured in this report, most of the schemes only certify a very small part of overall production volumes, or only one aspect of the 'problem' (e.g. only one part of the supply chain, only chemicals used at a specific part of the production process, etc.). Schemes should become more comprehensive and aim to cover the whole life-cycle of the product - as is, for example, the intention These measures are ultimately also beneficial for companies of the EU Ecolabel. operating in these sectors, as they guarantee the long-term viability of their business operations. It is evident that without Schemes must also be selective about their membership, healthy oceans there can be no fish for human consumption, with high entry requirements and a continuous drive for and that without healthy forests we risk dangerous climate improvement. Currently, schemes are all too often focused change, which will affect all agricultural production everyon getting all industry players on board, or trying to lower where. For the fashion industry, the lack of access to clean their bar to meet the growing demand for certified products, and sufficient water supplies represents a major business risk, which leads to a race to the bottom. This report calls for which is already affecting their operations. Industry must significant reforms, which should be based on the following realise that the scale of the challenge requires actions that go beyond the weak requirements of voluntary initiatives, and live up to its own commitments and market demands 1. Transparency, which includes availability of crifor greater sustainability.

four principles:

- teria and reporting on the performance of different members of the scheme, and encourages supply chain transparency.
- 2. Independence, which includes removing conflicts of interest, such as decoupling membership revenue from certification and compliance outcomes, and ensuring independent bodies set the standards.
- 3. Holistic approach with high traceability, aiming to cover the whole life-cycle of a product, and not allowing companies to pick and choose criteria or to be certified with conditions.
- 4. Aiming for continuous improvements, which includes setting the bar high enough to only certify companies that demonstrably go above and beyond average performance and are committed to continuous improvement. Schemes should also be science-based, reflect regulatory improvements and prevent backsliding.

While voluntary initiatives and certification can play a role in driving more sustainable practices, this report also concludes that they cannot - and should not - replace governmental and international regulations. The report proposes several measures that governments, companies and consumers can take, in the absence of effective certification schemes, and what can be done to put all three sectors on a more sustainable track. This includes: prioritising small-scale sustainable fisheries; establishing marine reserves and science-based fishing quotas, and enforcing them in the fisheries sector; a moratorium on deforestation and peatland draining in the palm-oil sector; and establishing zero-pollution policies and greater supply chain transparency in the textile sector.

References

- Amnesty International, 2016a. Palm Oil and human rights: What you need to know. [Online] Available at: https://www.amnesty. org/en/latest/news/2016/11/key-facts-about-palm-oil/ [Accessed 12 April 2018].
- Ecolabel Index, 2018. [Online] Available at: http://www.ecolabelindex. com [Accessed 2 April 2018].
- Ethical Consumer, 2017. Ethical Consumer: Markets Report. [Online] Available at: http://www.ethicalconsumer.org/portals/0/ downloads/ec%20markets%20report%202017.pdf [Accessed 2 April 2018].
- FAO, 2016a. The State of World Fisheries and Aquaculture (SOFIA). Rome. Food and Agriculture Organization of the United Nations (FAO), 2016. [Online] Available at: http://www.fao.org/ publications/sofia/2016/en/ [Accessed 2 April 2018].
- Froese, R. & Proelss, A., 2012. Evaluation and legal assessment of certified seafood. Marine Policy, Vol: 36, Issue: 6, Page: 1284-1289 [Online] Available at: https://doi.org/10.1016/j. marpol.2012.03.017 [Accessed 2 April 2018].
- Indonesia Investments, 2017. Only 16.7% of Indonesia's Oil Palm Plantations ISPO Certified. [Online] Available at: https:// www.indonesia-investments.com/news/todays-headlines/ only-16.7-of-indonesia-s-oil-palm-plantations-ispo-certified/ item8143 [Accessed 6 April 2018].
- McGrath, M., 2016. McDonald's fish: Row over sustainability 'cover-up'. BBC News, May 19 2016. [Online] Available at: http://www. bbc.co.uk/news/science-environment-36316246 [Accessed 28 March 2018].
- Nielsen, 2014. Global consumers are willing to put their money where their heart is when it comes to goods and services from companies committed to social responsibility [press release]. [Online], June 17 2014. Available at: http://www.nielsen.com/ us/en/press-room/2014/global-consumers-are-willing-toput-their-money-where-their-heart-is.html [Accessed 28 March 2018].
- Nielsen, 2015. The Sustainability Imperative: New Insights on Consumer Expectations [pdf]. October 2015. [Online] Available at: http://www.nielsen.com/content/dam/nielsenglobal/co/ docs/Reports/2015/global-sustainability-report.pdf [Accessed 28 March 2018].
- Potts, J. et al., 2016. The State of Sustainability Initiatives: Standards and the Blue Economy. Winnipeg: IISD/IIED/FAST. [Online] Available at: https://www.iisd.org/sites/default/files/publications/ssi-blue-economy-2016.pdf [Accessed 12 April 2018].
- Lucet, 2017. Cash investigation Coton: l'envers de nos tee-shirts (Intégrale). francetvinfo.fr. [Online] Available at: https://www. youtube.com/watch?v=_8dwxQGMgBw [Accessed 3 April 2018].
- Roundtable on Sustainable Palm Oil (RSPO), 2017. RSPO: Impacts. [Online] Available at: https://rspo.org/about/impacts [Accessed 12 April 2018].

- RSPO, 2018. World's most sustainable certified palm oil reaches market [press release]. 1 February. [Online] Available at: https:// rspo.org/news-and-events/news/worlds-most-sustainablecertified-palm-oil-reaches-market [Accessed 12 April 2018].
- Transport & Environment, 2017. Around half of EU production of crop biodiesel is based on imports, not crops grown by EU farmers - new analysis. [Online] Available at: https://www. transportenvironment.org/press/around-half-eu-production-crop-biodiesel-based-imports-not-crops-grown-eufarmers-new-analysis [Accessed 12 April 2018].
- WRI (n.d.) Project Potico [pdf]. [Online] Available at: http://www.wri. org/sites/default/files/potico_infographic_1_hb2_ja.pdf [Accessed 11 April 2018].
- Ziegler, I., 2017. Personal communication, International Cooperations at Sharkproject Germany. December 2017.

