

Tilley's waste causing human rights and environmental harms in Cambodia: Request for comment and action

To: [REDACTED]

Fri, Oct 27, 2023 at 4:40 AM

Hello Naly

Thank you for bringing this issue to our attention while we are concerned with the findings we can assure you that Tilley only works with vendors who have passed audits by reputable and reliable third party organizations such as :

- Sedex Members Ethical Trade Audit (SMETA)
- Business Social Compliance Initiative (BSCI)
- World Responsible Accredited Production (WRAP)

These audits provide assurance that the selected vendors follow safe, lawful and ethical manufacturing practices.

The factory that produced the item listed in your mail, was audited and Certified by WRAP - please see attached certification valid at the time of production. Under WRAP audits - production facilities go through compliance with all applicable legally mandated environmental standards, and demonstrate a commitment to protecting the environment by actively monitoring their environmental practices. In particular, *facilities will ensure proper waste management, including monitoring the disposal of any waste material* — whether solid, liquid or gaseous — to ensure such disposal is done safely and in a manner consistent with all relevant laws. Facilities are encouraged to minimize their impact on the environment by applying the principles of reduce, reuse, and recycle throughout their operations.



Every WRAP-certified facility has undergone an intensive social compliance audit verifying it abides by their 12 Principles, which are based on local laws and internationally recognized standards. Unlike other programs, WRAP provides annual, independent determinations of each facility's standing and incorporates risk-focused reviews after certification to confirm continued compliance. They also train manufacturer staff on a variety of critical subject matters and educate the next generation of social compliance auditors about best practices, evolving regulations, and the ever-changing landscape of responsible production.

Please see attached link to WRAP website detailing their 12 Principles

12 Principles
wrapcompliance.org



Once again thank you sending us a picture of a distressed belly band on some fabric scraps, do you have some addition pictures that can show that this packaging originated from the above factory, I will appreciate if you can share these with us. While we are waiting for your proof, we will be suspending all production / development form this factory.

I hope you will find the above explanation satisfactory demonstrates that we as a brand do take our corporate social responsibility very seriously and trust our vendor partners do the same.

Best regards



Tilley's waste causing human rights and environmental harms in Cambodia: Request for comment and action

Naly Pilorge

Mon, Oct 30, 2023 at 7:31 AM

To: [REDACTED]

Dear [REDACTED]

Thank you for your email.

We can confirm that at least one other brand whose waste we found at the same brick factory also sources from In Kyung (Cambodia) Co., Ltd., based on that brand's public supplier list.

We therefore urge Tilley to conduct a prompt and thorough investigation into its supply and value chain in order to determine how your pre-consumer garment waste could be improperly disposed of at a brick factory, including any weaknesses in the factory's management system. Based on the outcome of that investigation, we further urge Tilley to use its leverage to prevent, mitigate, and remedy the risk of any negative social and environmental impacts.

If the investigation sheds light on weaknesses in the factory's management system, we urge Tilley to work with the factory to determine if they have the will to comply with your social and environmental standards, and if so, to bring them into compliance at the earliest possible date. It is our stance that meaningful engagement and appropriate use of leverage is a preferable first step, as opposed to risking negative social impacts on factory workers by terminating business relationships without first attempting to bring all partners into compliance.

Pending the outcome of any investigation, we urge Tilley to work with the factory to prevent or mitigate any adverse economic impacts on factory workers during a suspension. Cambodian garment workers should not suffer the consequences of the mismanagement of pre-consumer garment waste. Many garment workers in Cambodia are already facing prolonged economic hardship, as evidenced by a recent [report](#).

Finally, we would like to note that while we appreciate your quick action, suspending or removing a supplier from your supply and value chain does not remedy any social or environmental harms that Tilley may have already contributed to or is directly linked to.

Best regards,
Naly



Naly Pilorge <[REDACTED]>

Tilley's waste causing human rights and environmental harms in Cambodia: Request for comment and action

Naly Pilorge <[REDACTED]>

Fri, Nov 24, 2023 at 4:44 PM

To: [REDACTED] <[REDACTED]>

Dear [REDACTED]

Thank you for copying LICADHO on your recent email to [REDACTED]

In particular, we note that Tilley outlined that:

"We further investigated this issue with the factory and can provide the following :

1

We have validated with the factory and can confirm that in accordance with local legislation, the factory had at this time, and continues to have contracts, in place with a Cambodian ministry of environment licensed contractor to remove waste regularly from their factory to an approved facility. The factory does not have visibility of what subsequently happens to that waste.

2

Attached are the contract between the factory and Sarom (Ministry of Environment approved waste contractor) and the business permit/license from the ministry of Environment for Sarom (with details of how waste was to be stored and reporting requirements to the government) – both of which were in place at that time – the factory has also provided current contracts / licenses that they have which can be provided if required.

3

We are unable to comment on the origin of the packaging shown in the Licadho document, but we can demonstrate that the factory used for the production in 2021 had the necessary contracts in place to ensure the secure disposal of waste in accordance with local legislation."

We appreciate that Tilley took steps to determine that the supplier factory has the required contracts with an approved waste disposal company. This finding demonstrates the ineffectiveness of these licenses and contracts in ensuring that waste is disposed of properly.

We therefore urge Tilley to complete a full and thorough investigation to identify and address the actual cause of improper disposal, regardless of where that occurred in the value chain or if that occurred after the waste left the supplier factory. In particular, we urge Tilley to raise these concerns with Cambodia's Ministry of Environment to ensure that these issues do not reoccur.

Further, as mentioned in your initial response to LICADHO, we note that Tilley initially suspended all production / development with the supplier factory. How long did this suspension last?

For reference, LICADHO this week published its [full report](#) documenting human rights abuses in Cambodian brick factories, as well as a [photo album with photographs of brands' waste at brick factories and brands' replies](#). We will continue to update this page with further replies if they are received.

Thank you for your continued engagement on this issue. We look forward to hearing from you.

Best regards,
Naly