IMPACT IN FOCUS

REDEFINING FASHION'S FOOTPRINT

EXAMINING FASHION'S SUSTAINABILITY CHALLENGES AND THE LEADERS DRIVING REAL CHANGE.

IMPACT IN FOCUS
REDEFINING FASHION'S FOOTPRINT
CARBON RESPONSIBLE

FOREWORD

I'M MATT PAVER, COO OF CARBON RESPONSIBLE, AND I'M HONOURED TO INTRODUCE THIS REPORT.

Understanding the relationship between fashion and sustainability is a topic that's especially important to me. In 2020, I founded SeaWear, a business dedicated to regenerative solutions for the textile industry, born out of my frustration with the status quo and a desire to drive and create tangible impact and systems level change. That same commitment to innovation now fuels my work at Carbon Responsible, here we help organisations gain a clear, pragmatic understanding of their carbon impact - empowering them to take informed, effective action.

As we navigate this critical moment for the fashion industry with regulatory pressure increasing and fast-fashion's rising impact, my hope is that this report not only highlights the issues but also offers credible, grounded solutions. As industry leaders, you're well aware of the shifting landscape. While the serious industry issues, especially on ethical labour practices can't be forgotten, this report and our Impact in Focus event series aim to bring some pragmatism to the conversation.

In preparing this piece, we really wanted to prioritise the leaders who are engaging in driving real change, even if incremental. We know many of you who will be reading this report are sustainability leaders at large organisations or innovators working on incredible solutions and hope that you find value here.

The challenges are real, and the pressure is high. But we hope to be able to create a space where you feel heard and to use our carbon expertise to help solve part of your organisation's sustainability puzzle.

Matt Paver
COO
Carbon Responsible

INTRODUCTION: THE STATE OF PLAY

As we know, the fashion industry in 2025 is at a critical juncture. Sustainability commitments are under scrutiny and regulatory pressure is morphing; in equal parts intensifying in some regions and relaxing in others. The gap between brand rhetoric and action is more evident than ever. London Fashion Week's recent announcement in early 2025 to gradually adopt a 'Copenhagen-style' minimum standards approach has led to debates about the industry's pace of change. Without a clear plan for industry-wide adoption, both approaches fall short of the systemic change needed to meaningfully cut carbon emissions and waste.

Meanwhile, Shein's continued expansion, both with consumers, its return to India and its listing on the London Stock Exchange challenges assumptions about consumer sentiment and economic ability to pay for more expensive, sustainable clothes.This raises difficult questions about whether the industry is moving fast enough to drive real systemic change.

Fashion is a vast global industry worth $1.3 trillion, employing over 300 million people along the supply chain. In the past two decades, global fibre production has nearly doubled, from 58 million tonnes in 2000 to 116 million tonnes in 2022, with projections of 147 million tonnes by 2030 if business continues as usual.

The industry's waste problem is well noted: the equivalent of one rubbish truck full of clothes is burned or dumped in landfill every second, and less than 1% of materials used to produce clothing are recycled into new garments, resulting in over $100 billion in material losses each year. A figure that should be seen as opportunity as well as concern. The environmental toll extends to emissions and pollution: the fashion sector is responsible for 2-8% of global carbon emissions, a figure that could rise to 26% by 2050 without systemic intervention. Additionally, 60% of all materials used by the industry are made from plastic, releasing 500,000 tonnes of microfibres into the ocean annually, alongside consuming 215 trillion litres of water per year, the equivalent of 86 million Olympic-sized swimming pools.

The situation is not all doom and gloom, however. For brands, retailers, and suppliers, the stakes are high. Regulations such as the Corporate Sustainability Reporting Directive (CSRD) in the EU and proposed legislation in the UK signal a new era of accountability. And while significant barriers remain: such as improving supply chains, data accuracy, and the ability to translate commitments into measurable impact, there is undoubtedly a collective desire to improve. Sustainability efforts are starting to truly shift the needle, no longer merely keeping pace with evolving greenwashing tactics. We just need to pause and examine how we arrived at this crossroads.

$1.3T

How much the global fashion industry is worth.

300M

Th amount of people the industry employees globally.

$100B

In material losses every year due to less than 1% of materials used to produce clothing are recycled into new garments.

147M TONNES

Predicted global fibre production by 2030.

INTRODUCTION

THE STATE OF PLAY

HOW WE GOT HERE

GOVERNMENT POLICY AND FASHION — A REALITY CHECK

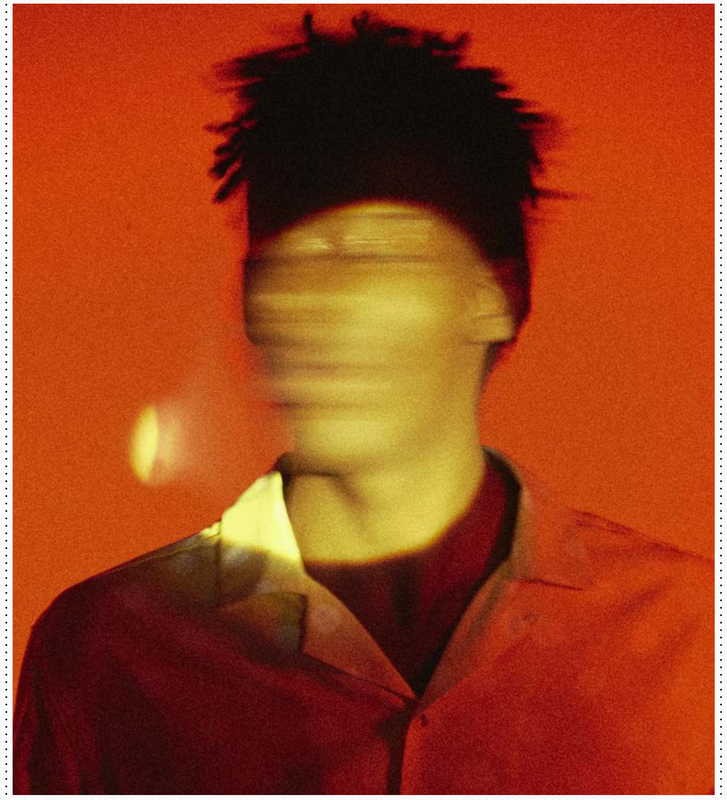
Fashion's regulatory landscape is evolving rapidly, with policymakers taking a firmer stance on sustainability. The EU's Corporate Sustainability Reporting Directive (CSRD) is set to impose stricter disclosure requirements, ensuring that brands account for their environmental impact in a transparent and standardised manner. Meanwhile, the UK's approach remains fragmented, with voluntary schemes still dominating despite growing pressure for legally binding mandates. The United States has also seen movement, with California's Fashion Act introducing supply chain due diligence requirements for major brands.

One of the most significant shifts in recent years is the focus on manufacturing emissions. Countries that have historically been the world's garment production hubs are under growing scrutiny to decarbonise their operations. Meanwhile, leading fashion brands are reconsidering their supply chains, with increased investment in nearshoring and low-carbon production methods.

Major fashion brands such as Nike, Adidas, and H&M have pledged to achieve net-zero emissions through voluntary frameworks such as the Science Based Targets initiative (SBTi), CDP, and the Fashion Pact, aligning their goals with the Paris Agreement. While these commitments indicate progress, some have been criticised as marketing strategies lacking genuine action or relying on carbon offsetting. However, scrutiny is increasing: the SBTi now requires detailed Scope 3 emissions reductions, and financial markets are demanding stricter Environmental, Social, and Governance (ESG) disclosures. The challenge remains whether brands will move beyond rhetoric by adopting low-carbon supply chains, renewable energy, and circular models, or if these pledges will remain unfulfilled promises. As mandatory carbon regulations tighten, voluntary commitments must now translate into measurable impact.

The fashion industry's supply chain reporting is mired in complexity, with a proliferation of certifications, standards, and regulations leading to a costly and inefficient reporting burden. Brands are having to navigate a patchwork of regional regulations and voluntary frameworks. In the EU, the Corporate Sustainability Reporting Directive (CSRD) is raising the bar for mandatory disclosures, while in the US, the SEC's proposed climate disclosure rules could require publicly traded companies to report emissions more transparently. Meanwhile, global initiatives such as the Science Based Targets initiative (SBTi) and the Carbon Disclosure Project (CDP) set voluntary standards that many brands, including Nike, H&M, and Kering, have pledged to follow. However, many companies develop their own bespoke reporting systems, forcing suppliers to input the same data across multiple platforms, increasing administrative costs and reducing focus on real sustainability action. The result is a complex, inconsistent approach that makes it difficult to compare progress across the industry and slows down systemic change.

To address these challenges, Carbon Responsible offers a streamlined solution. By providing audit-grade carbon emission reporting tools, Carbon Responsible simplifies the sustainability journey for businesses, ensuring compliance with diverse regulations while reducing the administrative load on suppliers. This unified approach enables companies to focus on genuine environmental impact rather than navigating a labyrinth of reporting requirements.

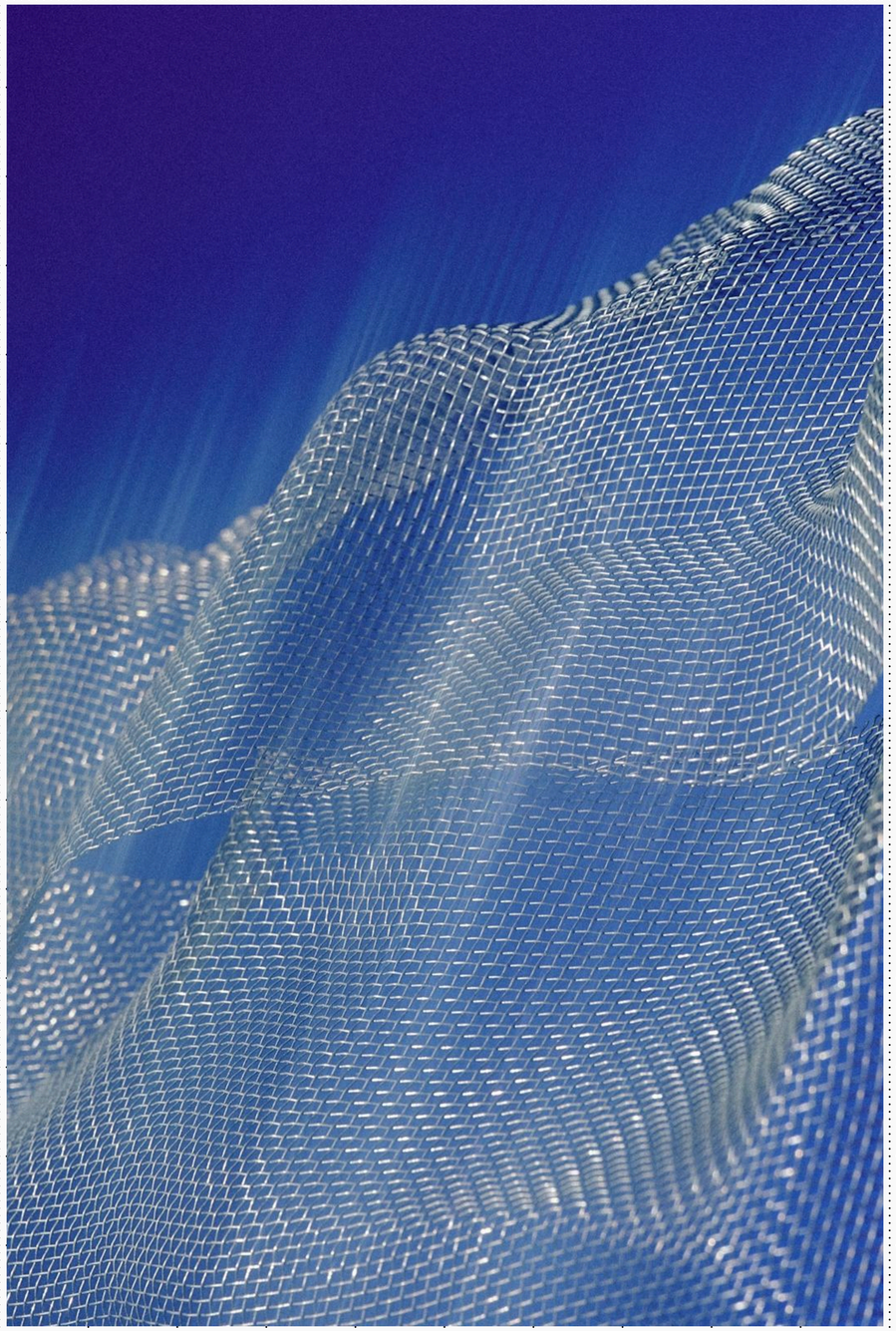


FAST FASHION PARADOX

INDUSTRY EVOLUTION VS CONSUMER DEMAND

While sustainability commitments continue to gain traction, the dominance of ultra-fast fashion giants like Shein provide a complex challenge to truly improving the industry. Shein's explosive growth has been fuelled by cheap disposable fashion, often at the expense of labour rights, environmental impact and unethical supply chains. Reports of low-wages, exploitative working practices and lack of transparency have raised concerns about whether industry-wide change can happen without stricter regulation and enforcement.

The downfall of Missguided serves as a cautionary tale that despite booming demand, its unsustainable business model, reliance on aggressive discounting and supply chain failures lead to its collapse. A collapse that demonstrates that while fast-fashion may be profitable in the short-term, reckless business practices can ultimately be unsustainable for business itself.



LOOKING BACK TO LOOK FORWARD

A DATA DRIVEN PERSPECTIVE

Back in 2021, Carbon Responsible conducted a study to assess how the UK's leading retailers reported their emissions. We wanted to understand:

1) How much UK fashion businesses were engaged and voluntary reporting

2) How accurate and clear their reporting was.

Now, nearly five years later, this report revisits that data to provide a comprehensive overview of where these retailers stand today and how their sustainability journeys have evolved.

MEASURING IMPACT: DOES FASHION NEED COMPULSORY REPORTING STANDARDS?

THE RACE TO SET TARGETS

Despite the challenges, many brands are actively working on reducing their emissions - but is it enough and how do we quantify what is ‘good’? Looking back at the UN Fashion Industry Charter for Climate Action launched in December 2018 at the UN Climate Change Conference (COP24) in Katowice, Poland we saw a significant push toward sustainability from leading businesses.

The initiative triggered household names to take action, such as Adidas, which committed to reducing absolute Scope 1, 2, and 3 emissions by 30% by 2030 from a 2017 baseline. Similarly, luxury leaders like CHANEL have pledged to reduce absolute Scope 3 GHG emissions by 42%.

The urgency for fashion businesses to engage is undeniable, but the key question is how consistent they are in meeting their targets versus the reality and challenges they face in achieving them.

In answer to this, in this section, we explore the role of reporting, mapping out key UK retailers' reporting practices from 2020, 2022, and 2024. We will also examine how carbon data mapping serves as an important foundation for meaningful action.

UNDERSTANDING SCOPE 1, 2, AND 3 EMISSIONS

We're sure you're very familiar with these scopes but thought this would be a helpful reminder for others in your organisation. To drive meaningful carbon reduction, businesses must categorise their emissions effectively:

S1

SCOPE 1: DIRECT EMISSIONS FROM COMPANY-OWNED OR CONTROLLED SOURCES.

Scope 1 refers to **direct emissions** from company-owned factories, logistics fleets, and retail stores using fossil fuels.Factories relying on **coal-fired boilers** or brands operating **diesel-powered transport fleets** are major contributors.

S2

SCOPE 2: INDIRECT EMISSIONS FROM PURCHASED ENERGY.

Scope 2 covers indirect emissions from purchased energy. Factories, warehouses, and retail stores powered by coal or gas-based electricity grids significantly increase a brand's carbon footprint. Transitioning to renewable energy in manufacturing, headquarters, and stores can cut Scope 2 emissions.

S3

SCOPE 3: ALL OTHER INDIRECT EMISSIONS ACROSS THE VALUE CHAIN.

Scope 3, the largest contributor, includes emissions from material sourcing, production, transportation, and consumer product use. Fast fashion's reliance on fossil-fuel-derived textiles (e.g., polyester) and global shipping networks adds to its emissions, while textile waste and landfill disposal further compound the issue.

Accurately measuring and addressing all three scopes is essential for credible decarbonisation. In the complex fashion industry, Scope 3 emissions should be the primary focus, as mapping them has the greatest impact, while Scope 1 and 2 serve as the minimum baseline.

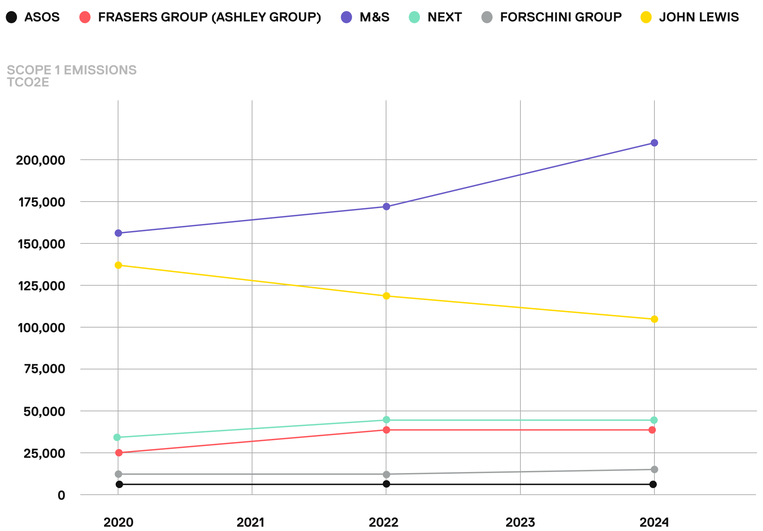
LOOKING BACK TO LOOK FORWARD

THE RESULTS

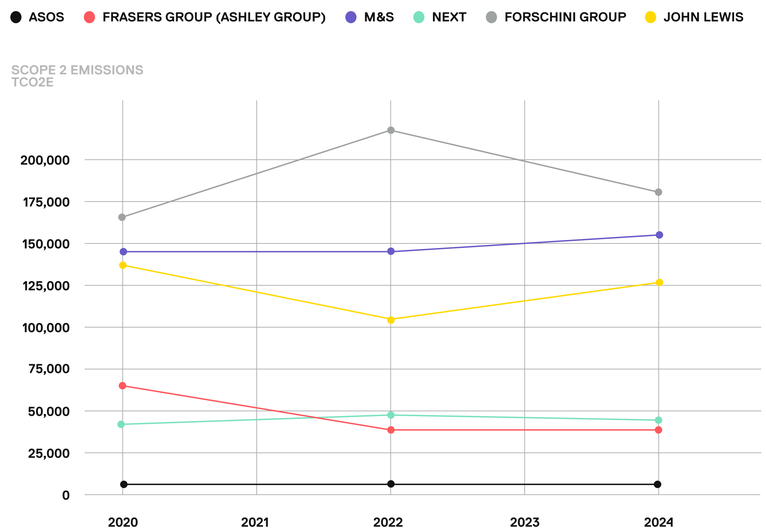
FOR THIS BODY OF RESEARCH, WE LOOKED INTO 49 RETAILERS IN THE UK, FOCUSED ON THEIR REPORT IN 2020, 2022 AND 2024.

Of the 49 companies 7 were not expected to report data due to their revenue being under 35 million. 4 companies were not expected to report as they had gone into administration. 5 companies are owned by parent companies and are not reporting their individual emissions. There were 16 companies that didn't have publicly disclosed 2024 data when expected. This left 17 companies that reported 2024 data. 12 of the 17 reported GHG data in 2022 and 9 of the 17 reported GHG data in 2020. However, only 6 of the 17 reported GHG data in 2020, 2022 and 2024. These companies will be referred to as the hero companies and include ASOS, Frasers group, M and S, Next, Forshschini group and John Lewis.

SCOPE 1 EMISSIONS TREND (2020-2024)



SCOPE 2 EMISSIONS TREND (2020-2024)



Note: We were unable to include a graph for Scope 3, as John Lewis was the only surveyed company out of the total 49 that provided publicly available data.

SCOPE 1 EMISSIONS

ASOS	Decreasing trend from 2020 to 2022, with a significant drop by 33.24% from 2022 to 2024.
FRASERS GROUP	A dramatic increase of 85.66% from 2020 to 2022, followed by a modest rise of 7.15% from 2022 to 2024.
M&S	A gradual increase in emissions, with a rise of 10.84% from 2020 to 2022 and 19.00% from 2022 to 2024.
NEXT	Positive growth trend with increases of 15.46% from 2020 to 2022 and 3.25% from 2022 to 2024.
FORSCHINI GROUP (TFG)	Fluctuated, with a drop in 2022 and a sharp rise in 2024.
JOHN LEWIS	A consistent decreasing trend, with a drop of 15.72% from 2020 to 2022 and an additional 12.93% by 2024.

SCOPE 2 EMISSIONS

ASOS	Also shows a decreasing trend, with a 17.12% drop from 2020 to 2022 and a further decline of 7.39% by 2024.
FRASERS GROUP	Significant reduction of 41.23% from 2020 to 2022, but a smaller decline of 2.28% to 2024.
M&S	Relatively stable, with a slight decline in the first period, but a recovery with a rise of 8.57% by 2024.
NEXT	Initially increasing by 6.16% from 2020 to 2022, but a decline of 8.25% by 2024
FORSCHINI GROUP (TFG)	An increase of 38.29% from 2020 to 2022, followed by a decrease of 10.26% by 2024
JOHN LEWIS	A significant drop of 21.66% from 2020 to 2022, followed by a recovery with an increase of 15.43% to 2024

SCOPE 3 EMISSIONS

Of the hero companies, only two (John Lewis and M&S) has external validation. Accreditation / third party external validation is key to ensure accuracy of ones reporting.

Scope 3 data for the companies without accreditation/ third party external validation will have data inaccuracies.

This varies depending on the individual company's access to supply chain data and its subsequent methodology of calculation. However, without accreditation/ third party external validation calculating the extent of data inaccuracy will be variable.

Furthermore, the translucent's around the methodology of scope 3 reporting in company reports demonstrate the further likelihood of data inaccuracies.

CASE STUDY: ASOS

CASE STUDY ASOS

Following the above, let's take a look at ASOS whose reported decrease in emissions may appear surprising given their continued growth and broad range of products.

For context, in recent years, ASOS, alongside Boohoo and ASDA faced regulatory scrutiny from the UK's Competition and Markets Authority (CMA) over greenwashing concerns in relation to claiming and advertising to shoppers that some of their own brand collections were more 'sustainable' options. This investigation by the CMA highlights the growing need for standardised and transparent sustainability reporting within the fashion industry. As carbon experts, who have years of experience mapping out businesses emissions, we looked into this further and concluded the following;

1. One of the key reasons for Scope1 drop in 2024 is likely linked to their significant financial loss of $459 million for the fiscal year ending September 1st, 2024, an increase from the previous year's loss of $359 million. This decline in profitability is coupled with an 18% drop in sales, bringing total revenue to $3.5 billion. While financial setbacks are common in the evolving retail sector, it is crucial to examine how these economic pressures influence ASOS's sustainability commitments. This drop in sales evidently would decrease overall impact. One way businesses can evidence progress even in a growth or loss cycle is to develop relevant intensity metrics (e.g., tonnes of CO2e per garment).
2. Another point to note for a business model such as ASOS when it comes to reporting numbers is the fact that they operate a wholesale model with hundreds of third party retailers listed on site. This asks the question on how true impact can be if not accounted for (which looking into their reporting is not). ASOS's ability to reduce Scope 3 emissions heavily depends on supplier and brand partner commitments. Encouraging these partners to adopt science-based targets is critical.This is something the group notes in their recent 2024 impact report; that by FY30, 90% of emissions generated by brand partner products sold on ASOS must come from brands with science-based targets (SBTi).

The example of ASOS identifies how complex public information regarding how challenging businesses emissions and wider impact is to interrupt on the surface

REFLECTIONS AND HOW WE CAN USE THESE FINDINGS TO MOVE FORWARD

During our data collection process, a key observation emerged: access to emissions reporting remains a challenge. This raises crucial questions about:

- The willingness of fashion businesses to report annually. While larger, multi-brand corporations appear to have a more comprehensive approach to data, many fashion brands are failing to provide complete and current emissions data. Fear of disclosure is a common feeling amongst brands.

- Whether regulation is needed to ensure transparent, public reporting. Relying on the voluntary benevolence of companies has helped drive the conversation forward, but self-policing in any arena rarely works.

- Additionally, the capacity to locate data is inconsistent and difficult. Sustainability is consistently mentioned by brands who do not report on their genuine GHG emissions. This indicates a systemic problem with reporting in the fashion industryTo provide more context, we sat down with Anna Woods, Founder of Positive Retail (formerly of Topshop and Whistles). As a former senior leaders at some of the UK's biggest fashion brands, Woods understands the complexities:

My thoughts are that everyone on the board needs to be fully bought in to drive real change - it shouldn't fall solely on one sustainability person or department. Businesses should approach the new retail frontier as responsible enterprises where everyone is involved and understands their role in contributing to progress.Isolating sustainability efforts within a single department makes meaningful impact difficult. The best results come when the entire organisation is engaged, directors recognise and take responsibility for how their teams contribute, and all leadership actively supports and champions sustainability. Ultimately, the CEO or person in the highest position of authority must see it as very worthwhile and non-negotiable for the business

- Anna Woods, Founder, Positive Retail (Ex Topshop and Whistles)

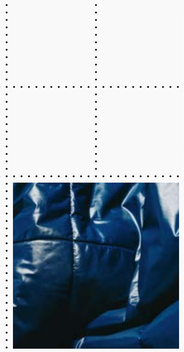
LOOKING AHEAD

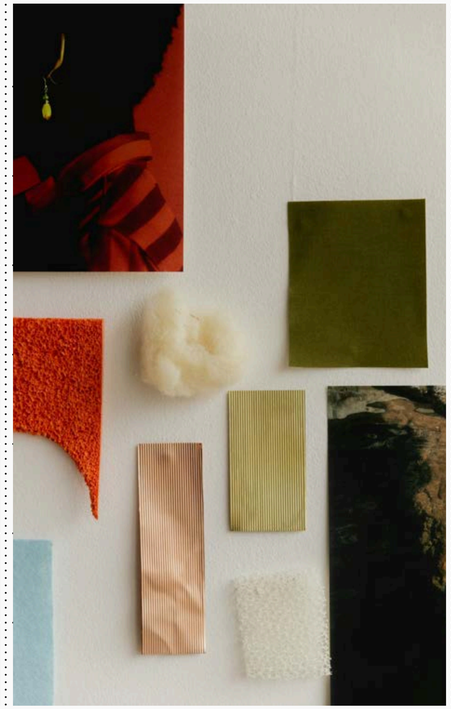
INNOVATIONS AND ACTIONABLE STRATEGIES

TRENDS TO WATCH IN 2025 AND BEYOND

A significant shift is occurring in material sourcing, with a growing emphasis on regenerative fibres and alternative textiles. Brands are exploring materials that not only reduce environmental impact but also promote biodiversity. For instance, the adoption of plant-based faux furs, crafted from natural fibres, like viscose and cotton, is gaining momentum as a sustainable alternative to traditional synthetic options.

Technological advancements are also playing a pivotal role in driving sustainability. The maturation of blockchain technology is enhancing supply chain transparency, allowing brands to create secure, decentralised records throughout a product's lifecycle. This innovation ensures traceability and accountability, crucial for sustainable practices.





INNOVATIONS DRIVING REAL CHANGE

Several startups are pioneering low-carbon solutions, particularly in denim manufacturing—a sector traditionally associated with high environmental costs. Crystal Denim, for example, has developed what it claims to be the first net-zero jeans, setting a new standard for sustainable apparel.

Collaborations are also fostering innovation. A partnership between Recover™, Evlox, and Jeanologia led to the creation of the REICONICS recycled denim capsule collection, combining expertise to improve circularity in the denim industry from fibre to finish.

These initiatives demonstrate that sustainable practices are not only feasible but can also drive industry transformation.

As many of you reading this report are sustainability leaders, we wanted to highlight innovative B2B solutions that could benefit your business models. We partnered with Sustainable Ventures - Europe's leading growth partner for climate tech startups and scaleups - to highlight a range of solutions within their ecosystem; from manufacturing innovations to in-store and point-of-sale advancements.

PULPATRONICS

Founded in 2023 by co-founders Barna Soma Biro and Chloe So, PulpaTronics develops affordable and sustainable metal-free RFID technology for a more circular economy.

RFID technology has been instrumental in product identification and tracking, however, more than 45bn of these single-use tags end up in landfill annually after a short lifespan. Unlike conventional RFID tags that are made of metal antennas, silicon microchips and layers of adhesives, our laser technology enables the RFID tag to be fully recyclable and metal-free. By doing so, we reduce components, simplify manufacturing and enable a more circular economy.

We estimate our tags to cut CO2 emissions by at least 60% and reduce costs by 30%.With the vision to expand from retail into other industries like packaging, hospitality and healthcare, PulpaTronics is on a mission towards making smart tracking more accessible and sustainable. The startup has already been awarded over a dozen prestigious design and engineering awards, gained grant support from Innovate UK and secured VC funding.

THIRD FIND

Third is revolutionising the preloved luxury market by making it easier than ever to find and compare the best deals on coveted designer bags. As a dedicated search and comparison platform, Third curates the broadest selection of preloved luxury bags from the world's most trusted resellers, ensuring seamless access to rare and iconic styles.

By aggregating inventory across leading resale platforms, Third eliminates the guesswork of shopping secondhand, empowering buyers with transparency, choice, and confidence. Operating as an inventory-free platform, Third is not just redefining luxury resale.

Third is making premium preloved more accessible, effortless, and smart.

PETTIT PLI

Founded in 2017 by aeronautical engineer, Ryan Mario Yasin, Petit Pli invents and applies groundbreaking material technologies that solve problems for individuals, businesses and the planet across the textiles value chain.

An estimated £140 million worth of clothing enters the UK landfill every year and our unused clothing is worth approximately £30 billion. These numbers are shocking, but suggest an opportunity to reimagine clothes from the ground up that won't endanger our future. With an obsession for reducing waste, in only a few years Petit Pli is proud to have won multiple design awards, started a sustainable childrenswear revolution with Clothes that Grow, and embarked on a journey to transform adult clothing too.

Petit Pli has developed a unique, patent-accepted, material technology inspired by deployable satellites. For LittleHumans, this means clothing that grows to expand 7 sizes - equal to 48 months, and for adults, garments that are so versatile they adapt to a wide range of body shapes and sizes, styles, activities and purpose.

RADIANT MATTER

Radiant Matter is a material innovation company, developing a new generation of sparkling colour and material solutions for the circular economy. Despite their small size, the collective impact of sequins is massive - but often overlooked.

Sequins are small disks of petroleum based plastic, using either a synthetic coating or metallic foil for the shimmering effect. They are widely used within all sectors of fashion, textiles and consumer goods, and have a long cultural relevance dating back to Egyptian times.

Due to their size they are classified as a micro plastic and contribute to the growing global plastic problem. Sequins, like glitter, also leak into our environment, causing problems to human and planetary health.

BIOPHILICA

Biophilica was founded in 2019 and is led by a talented, multidisciplinary team. The company's 300 m² facility is located in Earlsfield, Southwest London, where it has established a batch production and demonstration line.

Biophilica's first product, Treekind®, is a plastic-free leather alternative that contains no PU, distinguishing it from many other leather alternatives.

It is made using lignocellulosic feedstocks sourced from urban parks, gardens, and inedible agricultural feedstock. Treekind® is compostable and non-toxic. Following this innovation, Biophilica developed a 100% bio-based adhesive.

HOW CARBON RESPONSIBLE CAN HELP

At Carbon Responsible, we are dedicated to guiding brands through the complexities of sustainable transformation. Our expertise in carbon accounting and supply chain analysis enables us to provide tailored strategies that align with your sustainability goals. By partnering with us, fashion brands can navigate the path towards a lower-carbon future, ensuring compliance with emerging regulations and meeting the expectations of increasingly conscious consumers.

The journey towards complete sustainability is challenging, but with a commitment to change, and accountability the fashion industry can evolve to meet the demands of our time. Whether you're looking to explore where to start or want to look into accreditation for current mapping, we're here to help.

CONTRIBUTORS

EDITORIAL

MATT PAVER
COO, CARBON RESPONSIBLE

OISIN TEEVAN
CONTENT LEAD, CARBON RESPONSIBLE / OSHCOMM

ELE WARD
CMO, CARBON RESPONSIBLE

OLIVER KIMBER
DATA AND ANALYTICS ASSISTANCE

DESIGN

KEVIN KREMER
KK STUDIO

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CONTACT US:
INFO@CARBONRESPONSIBLE.COM

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