



How fair is fashion's water footprint?

Tackling the global fashion industry's destructive impacts on Africa's water and workforce health



Water Witness leads action, research, and advocacy for a global future of shared water security, where all people have access to the water needed to thrive, and are protected against pollution, droughts, flooding, water conflict and degradation of water-related ecosystems.

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Cover image: Pollution of the Caledon River, near Maseru in Lesotho caused by untreated industrial effluent discharge from denim and jeans manufacturers. Credit: Robin Hammond/Panos

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Executive Summary

***How fair is fashion's water footprint?* reports on the water-related impacts of textile and apparel production in Africa to supply the ever-growing needs of the global fashion industry.** It represents the results of research by Water Witness in five case study countries, analysis of data from across Africa and interviews with experts in government, business, and civil society.

Although pockets of good practice exist, our research shows that production of clothing, including for high street brands in Europe, the UK and the USA is killing Africa's rivers through polluting discharges of untreated industrial wastewater. We find that the sector competes with communities and nature for access to scarce water, and that in some cases, factory needs are prioritised over the human right to water. We also find that factory workers, around 80% of whom are women, often lack access to safe water, washing facilities and toilets, and that this undermines their dignity, wellbeing and health, including through exposure to Covid-19 transmission. Notably, a lack of access to clean water and toilets in the workplace is a widely recognised indicator of modern slavery.

We demand accountability and leadership from fashion sector stakeholders to reverse this unacceptable and seemingly widespread trend of irresponsible and illegal water use.

Immediate adoption of good water stewardship across the sector, factory certification against best practice standards, and transparent disclosure of performance on water are urgently needed so that responsible businesses can be differentiated.

We are not calling for an end to fashion sourcing in Africa. Instead, we call for action and assurance that sourcing and production of goods in Africa are based on sustainable resource use, decent working conditions and basic principles of social justice.

Producers, brands, retailers, investors, governments, and high street customers must act now to ensure that the fashion industry has a 'fair water footprint' in Africa, so that much needed job creation and growth are decoupled from the destructive water impacts we observe.

We set out what each of these groups must do to guarantee zero pollution, safe water and sanitation, equitable withdrawals, climate resilience and ecosystem protection, so that Africa can become a global role model of sustainable production and decent employment in the fashion sector rather than another victim of 'fast fashion'.

AFRICA - the rising star of global textile and clothing production

Reformed trade agreements, tax incentives, targeted aid programmes, and the cheapest labour costs on earth have stoked the rapid growth of garment manufacturing across Africa. Pre-pandemic, Africa's fashion exports generated revenue of US\$ 4.6 billion a year, a figure which exceeds the annual flow of aid into Africa from any European donor. Africa now has an important toehold in the global fashion industry that in 2019 was worth US\$ 2.5 trillion and employed 75 million people.

Irrespective of the pandemic's economic repercussions, the fashion industry can play an important role in Africa's social and economic progress. Its ability to generate jobs, foreign investment and export revenue give the textiles and apparel sector top billing in the growth strategies of many African states, where reducing youth unemployment is a priority because of its links to instability, conflict, and the tragedies of outward migration. Although accurate figures are difficult

to find, it is estimated that textile and apparel production already supports, directly or indirectly, the livelihoods of as many as 50 million people in Africa.

Realising these socio-economic benefits must be based on judicious resource stewardship, particularly because fashion is one of world's thirstiest and most polluting sectors and poses significant risks to Africa's environment. The region's water resources and water ecosystems are highly vulnerable and already face severe stress because of depletion and degradation, rocketing demand, climate change and deep-seated financial, capacity, and governance challenges.

Addressing the problems identified in our report, and safeguarding Africa's water and workers must be a priority. The continent's fledgling fashion sector, governments, suppliers and workers can ill afford to fall victim to the pollution problems, slave-labour scandals, and reputational risks that have dogged the sector elsewhere.

Brands and buyers sourcing from African textile and apparel production countries:

Ethiopia



Madagascar



Lesotho



Mauritius



Who's who within Africa's fashion value chain?

Several countries are already heavily dependent on the sector which can generate up to 60% of national export revenue, and as much as 30% of gross domestic product (GDP). Beyond the North African giants which account for 50% of Africa's exports, key producers include South Africa, Eswatini, Mauritius, Madagascar, Burkina Faso, Lesotho, Kenya and Ethiopia and a further 10 countries where the fashion sector is being actively nurtured.

Key consumer markets are in Europe, most notably France, the UK, Germany and Italy, East Asia, and the USA, which alone imports clothing worth US\$ 685 million a year from Africa. The list of those sourcing from Africa is a who's who of high street names and brands including: Adidas, Asos, Calvin Klein, Carrefour, Disney, Dockers, Esprit, Etam, G-Star, GAP, George (ASDA), Hanes, H&M, Hugo Boss,

Levi's, Mango, Marks and Spencer, Monsoon, Next, Otto, Primark, Puma, Reebok, Ralph Lauren, Sears, Tesco, Tommy Hilfiger, Walmart, and Zara.

These markets and customers are supplied with garments produced in factories owned by multi-national corporations, or more commonly by hundreds of supplier companies and small to medium sized enterprises (SMEs) which manufacture to order. Most production sites are owned and operated by Asian companies, although locally owned enterprises are increasingly involved. The supply chains are complex, with fabrics imported from Asia or locally produced, using foreign or African cotton - which itself supports over 3.5 million smallholder farmers who face a multitude of water-related problems.

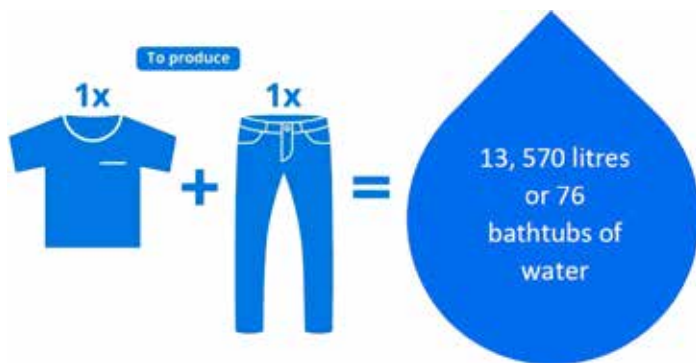
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Fashion industry impacts and water risks:

In our case study countries of Ethiopia, Lesotho, Madagascar, Mauritius and Tanzania, the rapid growth and strategic importance of textile and apparel production coincides with significant water challenges. The primary impacts and risks identified are set out here, supported by illustrative stakeholder testimony:

The typical combined water footprint of a tee-shirt and jeans, based on analysis by Chapagain et al.



Untreated industrial effluent from NIDA Textiles Ltd discharging to the Msimbazi River in Dar es Salaam where river flow was found to have a pH of 12 - like household bleach - and high Chromium levels. Source: Water Witness

1. Pollution by untreated industrial effluent and wastes

Pollution from textiles production is a very significant problem in Africa. Untreated effluent from textile factories is killing our rivers - there is no life downstream. These businesses need to stop polluting Africa's waters. We need economic growth, but it must never come at the expense of our environment and the health of our children.

Sareen Malik, Executive Secretary, African Civil Society Network for Water and Sanitation

Industries cause water pollution in surrounding towns...poor solid waste management by the industry is a major problem in our river systems. There are tensions between the communities and the textile industry because of water pollution turning rivers blue. Communities complain about the smell of water and health issues for livestock and people living close by.

Senior Government Official, Lesotho

The situation (of pollution from the textiles factory) has been brought to the attention of the authorities on several occasions but there has been no improvement or action... The pollution threatens our health as we eat vegetables irrigated with the water. Contact with the pollution results in burnt skin and disease.

Community Leader, Tanzania

Wastewater management is the main issue for Madagascar. Downstream communities face water pollution challenges because there is no water treatment. Our water law obliges companies to treat their wastewater, but industries and industrial zones are not complying, except for a handful, who do so voluntarily.

NGO Director, Madagascar

Reliable water quality monitoring data is not widely available, but we find credible evidence in all countries of non-compliance with pollution control law by textile and apparel manufacturers and impacts on human health and nature as a result of untreated wastewater discharges. The textile industry produces potentially toxic metals, dyes, bleaching agents, and other pollutants with cardiovascular, respiratory, carcinogenic, and neurotoxic impacts on

human health. Without proper treatment, wastewater discharges render rivers lifeless and unfit for use. Whilst some businesses are taking a responsible approach to wastewater treatment, our case studies also show how untreated effluent from textiles manufacture has contaminated the water needed by many thousands of vulnerable people for domestic use and food production, and how downstream businesses have been forced to close as a result.

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2. Inadequate water supply, sanitation and hygiene (WASH)

Access to water supply, sanitation and hygiene at factories is very poor. It affects women the most.

Senior Government Official, Lesotho

Many workers live without proper sanitation.

Researcher/Academic, Madagascar

Many thousands of women are employed in the textile and apparel sector in Africa. We don't know how well their WASH needs are provided for in the workplace or in their communities because the data isn't reported. We don't know if they have the services needed to protect against COVID or for menstrual hygiene.

Sareen Malik, Executive Secretary, African Civil Society Network for Water and Sanitation

Multiple sources raise serious concerns about the adequacy of access to clean water, washing facilities and toilets in Africa's garment factories, as well as in the communities where workers live. According to the International Labour Organisation and Ethical Trading Initiative, a lack of water, washing facilities and toilets in the workplace is one indicator of modern-day slavery. Access to safe water and sanitation in the workplace is a legal requirement and has been an international convention for over 50 years. Despite its importance, the adequacy of WASH services does not appear to be regularly monitored or disclosed by clothing manufacturers in Africa.

Whilst companies do not have direct responsibility for water and sanitation services in the communities where workers live, safe access for staff in their homes should be a priority because of well-documented benefits for health, and wellbeing and productivity. Many argue that the sector shares responsibility for inadequate services in communities where the influx of garment workers has overburdened outdated local infrastructure.

Ensuring sustainable access to safe water supplies, sanitation and hygiene services is an urgent priority, not only because of their roles in controlling Coronavirus, but because of their importance for health, menstrual hygiene management, and the dignity of the women who make up the majority of the workforce. Progressive action by business, such as ensuring full workplace access and joint advocacy toward the water Sustainable Development Goals (SDGs), could achieve much in Africa's garment production countries where typically, 90% of people lack basic sanitation and 50% lack basic water supplies.



3. Sustainable, equitable and resilient water use for production

Industries are prioritised for water provision over communities, who can be forced to manage for several days without water. There are tensions between water users and industries in urban areas.

Senior Government Official, Lesotho

Privileged access to water by businesses at the expense of community needs runs counter to the principles of water justice, and represents a direct contravention of the human right to water.

The reliable availability of water for production in the textiles and apparel sector is a current or emerging challenge. Concerns include the sustainability of withdrawals where knowledge of the available water resource is limited, and conflict and competition for water with existing users, including water needed by people and nature.

The examples we found where water for textile and apparel production is prioritised at the expense of the domestic needs of local communities are a cause for alarm. Such privileged access to water by businesses runs counter to the principles of water justice and represents a direct contravention of the human right to water. There are also concerns regarding the resilience of supply to the sector and the ability to respond to increasingly frequent drought and flood events without impacting on community needs.



4. Water risks in the supply chain

The production of cotton and leather as inputs to clothing manufacture pose significant water risks, and a lack of disclosure and transparency raise questions about the responsible sourcing of these raw materials. The use of agricultural chemicals, insecticides, herbicides, and fertilisers is especially intensive in cotton production, and

the controls in place to ensure safe use, handling and disposal are particularly weak in Africa. The health of cotton farmers supplying the sector, and ecosystems and communities downstream are therefore at risk. Cotton production can impose high water demands, and potential for soil degradation in production areas.

5. Water governance challenges

The pollution is blatant and well known, and the laws are strong but never enforced. Regulators are blind to the pollution. It is as if the industry has a free pass to pollute.

Herbert Kashililah, National Water Board, Tanzania

Regional water councils lack capacity in all regards to be able to manage water resources. Regional water councils lack the capacity to engage with stakeholders. They are barely able to respond to complaints.

NGO Director, Madagascar

It is unclear who manages what in terms of water resources management. The public sector is under financed.

Factory Group, Mauritius

As brands go into new countries and regions and conduct due diligence to determine risks, they should follow up on the promises made... At a global scale we frequently see that effluent treatment plants at factories and industrial parks are not maintained, if running at all.

Sean Ansett, President, At Stake Advisors

The root cause of these impacts and risks is inadequate water management and governance, both by those working in the sector and more widely, at municipal, basin and national scale.

The ability of utilities, regulators, and government authorities to control the water impacts of the textiles and apparel sector is severely constrained by a lack of data, staff, finance, accountability, and political will. In one country, corruption was cited as a problem. Alongside these stubborn institutional challenges, there is also evidence that water is a low priority for corporate governance in the sector.

Unless responsible water use becomes the operating norm, the reputational risks associated with poor water performance could destroy Africa's fashion sector in its infancy, derail sectoral growth and deny the continent of valuable contributions to sustainable and inclusive development.

There is negligence and lack of commitment from companies while the regulators are not strongly enforcing the required standards. Companies become responsive only when a letter/warning is given from government regulatory bodies.

Factory/Site Manager, Ethiopia

Foreign business owners do not engage on national interest issues like water.

Senior Government Official, Lesotho

Water management is not our issue, it is the responsibility of the government.

Factory Group, Mauritius

Some companies have the sustainability commitments in their documents but lack proactivity in terms of actual commitment on the ground.

Sustainability Manager, H&M, Ethiopia

Unprincipled businesses may view these governance and regulatory shortfalls as being beneficial to the sector, for example, by reducing short-term costs of wastewater treatment. However, this laissez-faire approach to environmental and social protection is highly destructive within an industry where responsible sourcing is now a basic expectation of investors and customers. Unless responsible water use becomes the operating norm, the reputational risks associated with poor water performance could destroy Africa's fashion sector in its infancy, derail sectoral growth and deny the continent of valuable contributions to sustainable and inclusive development.



Fair Water Footprints through credible water stewardship

Our ability to deliver social and economic development for our people is dependent on our adoption of water stewardship.

State Minister Teka Gebreyesus, Ethiopia's Minister for Trade and Industry.

There is a clear case for water stewardship among industries in Lesotho.

Senior Government Officer, Lesotho

It is time for these businesses to step up, to show leadership and demonstrate their credibility as responsible players. They have the potential to make an important contribution to delivering on the goal of universal water, sanitation and hygiene access.

Some authorities like those in Kenya are starting to get to grips with the pollution challenge, but they need help, and we need stronger accountability for water from all stakeholders. Politicians, producers, buyers, retailers, investors, communities and consumers need to take responsibility for improved water stewardship right now.

Sareen Malik, Executive Secretary, African Civil Society Network for Water and Sanitation

Stakeholders in all countries recognise the opportunity offered by improved water stewardship as a means of de-risking sectoral growth and ensuring a fair water footprint for the sector. Water stewardship is the use of water which is socially equitable, environmentally sustainable and economically beneficial. Proactive involvement in good water management by businesses at site level and beyond, offers multiple benefits. For companies it has been shown to reduce operational costs, and interruptions to production, drive resource efficiencies, innovation and full compliance with water-related law, improved supplier, staff and government relationships as well as generating new investment and market share with 'future facing' customers. It also holds companies to account for protecting workers, ecosystems and communities, planning for floods, droughts and resilience, alignment with government policy, and for contributing to addressing shared challenges at basin or municipal scale. Several leading companies in the sector are already adopting water stewardship and seeing benefits. The problem is that they are the exception rather than the norm.

The Alliance for Water Stewardship (AWS) has devised a voluntary international standard which guides and recognises good performance on water through third-party audit. It has been shown to be a cost-effective mechanism for mitigating water risks in supply chains, globally and in Africa. It drives benefits for communities, government, and businesses, and differentiates responsible water users to investors, buyers, and customers. Other voluntary initiatives and standards, such as the Higg Index, Sustainable Apparel Coalition, Textile Exchange and ZDHC exist to guide responsible production in the textile and apparel sector, but they have been shown to fall short in their ability to safeguard water, and water users.

There is a clear opportunity for textile and apparel sector stakeholders to adopt AWS water stewardship as a practical and strategic contribution to sustainable development and COVID recovery in Africa. Promisingly, a number of sector stakeholders such as Tooku in Tanzania, Indochine, H&M, PVH and the Industrial Parks Development Corporation in Ethiopia are committing to good water stewardship through alignment with the AWS Standard.

Certification of factories against the AWS standard and corporate disclosure on pollution to CDP Water are routes to a fairer water footprint for fashion.



Investor and customer action to trigger change

The adoption of water stewardship can be incentivised through market drivers. New demand by customers, buyers and financiers can drive certification against best practice standards, which in turn can enhance investment and competitiveness by providing assurance of responsible water use. In turn this can result in greater investment in, and preferential purchasing from water stewards. Therefore, as well as equipping producers with the knowledge needed to adopt water stewardship there is a need to stimulate demand for credible stewardship, and to strengthen the mechanisms through which it can be incentivised, disclosed and rewarded. Some of these, such as CDP's Water Disclosure Initiative can be powerful forces for positive change on the ground, in globalised supply chains, and in investment portfolios. CDP's water disclosure mechanism provides the transparency needed for investors to hold companies to account for mitigating risks and 'doing no harm'. Their global benchmarking has helped raise the importance of water management in the board room and to change corporate culture and practice.

As it emerges from the wreckage of 2020, when profits plummeted by 95%, the fashion industry must reforge its social relevance and embed resilience in its business models. Industry leaders themselves identify justice, sustainability, and meaningful value chain partnerships as essential components for recovery.

Consumers, and increasingly, investors, will reward companies that treat their workers and the environment with respect, and the deeper relationships that emerge will bring benefits in agility and accountability.

McKinsey & Co, State of Fashion Report, 2021

Countries and companies that champion water stewardship and which demonstrate and disclose good water performance within textile and apparel production will see considerable benefits. Those that do not, are likely to see water insecurity and reputational issues emerge as an impediment to future growth.

The immediate actions we need to see in response to our findings

Our analysis shows that everyone has a role to play in ensuring that global fashion, and the cotton, textile and apparel production behind it, has a fair water footprint - so that the sector's socio-economic benefits in Africa and elsewhere do not come at the cost of polluted rivers or the denial of human rights to workers and communities. In the following table we set out

what producers and suppliers, brands, retailers, buyers, investors, governments in producer and consumer countries, the media, citizens and consumers can do. Water Witness and our trusted partners stand ready to help all these stakeholders to learn from our findings, and to collaborate to forge the fairer water footprints, and the fairer water future we all need.

Action needed by all:

Commit to a Fair Water Footprint in the fashion sector which ensures:

- full access to safe water supply, sanitation and hygiene (WASH) for workers
- zero pollution
- sustainable water withdrawals
- protection of ecosystems and the human right to water
- preparedness for floods and droughts
- compliance with water-related law and an end to illegal water use.

Demand assurance and accountability for a Fair Water Footprint through responsible water stewardship:

- farm-to-factory certification against the Alliance for Water Stewardship (AWS) standard
- disclosure of corporate water performance to CDP's Water Disclosure Programme

Action needed by specific stakeholders:

Textile & apparel producers & suppliers	<ol style="list-style-type: none"> 1. Assess and understand water risks & opportunities across the business. 2. Set targets for better water performance & report on progress. 3. Innovate & collaborate to ensure sustainable water use, pollution control & support for supply chain producers, workers & their communities. 4. Benefit from programmes of support & training for good water stewardship. 5. Certify sites against the AWS Standard.
Brands, retailers, buyers & designers	<ol style="list-style-type: none"> 1. Map, track & disclose water risks & stewardship within supply chains & target support for AWS certification. 2. Establish stewardship as a condition of doing business through supplier codes & due diligence. 3. Tie C-Suite remuneration to improved water performance. 4. Talk to customers about water to drive action. 5. Improve traceability so that water stewardship is recognised and rewarded. 6. Join & lead local and global forums to drive stewardship performance in the sector.
Investors	<ol style="list-style-type: none"> 1. Engage companies, raise resolutions & vote down Boards that do not prioritise water stewardship. 2. Screen investments for good water stewardship, demand corrective action & divest where necessary. 3. Assess & disclose portfolio water risks, & management strategies. 4. Join & lead local & global forums to drive water stewardship performance.
Government - producer countries	<ol style="list-style-type: none"> 1. Prioritise water governance through financing, oversight & regulation. 2. Target capacity, financing, & action for wastewater treatment, & reform tariffs to reflect the value of water. 3. Make water stewardship a condition of business & investment licences. 4. Scale water stewardship in Industrial Parks to attract & safeguard responsible businesses. 5. Convene stakeholders to trigger action on shared water challenges.
Government - consumer countries	<ol style="list-style-type: none"> 1. Require mandatory disclosure & due diligence by companies & financiers on water performance. 2. Legislate so that imported goods meet domestic labour, health, safety, & environmental standards. 3. Understand the water footprint of goods & services, & and take action for sustainability. 4. Collaborate globally to ensure that global trade and consumer society have a Fair Water Footprint.
Fashion sector initiatives & standards	<ol style="list-style-type: none"> 1. Ensure that initiatives to improve social & environmental performance include proper handling of water & WASH related issues, & have credibility through accountability & disclosure. 2. Avoid piecemeal or partial handling of water issues - efficiency or ZLD are not enough! 3. Seek alignment & coherence within standards & avoid fragmentation, 'initiative overload', stakeholder fatigue & consumer mistrust.
Media & civil society	<ol style="list-style-type: none"> 1. Investigate & report on the water footprint of consumer society & its social & environmental impacts. 2. Demand & advocate for sustainable & just resource use by companies, financial institutions & governments. 3. Provide compelling & tenacious coverage of water issues, and the constructive steps which can be taken by decision makers and citizens to drive positive change.
Concerned citizens & customers	<ol style="list-style-type: none"> 1. Use people power! Only purchase from certified water stewards & call out corporate water abuse. 2. Demand disclosure on water impacts & credible water stewardship. 3. Ask retailers, banks, pension funds & government for their water stewardship credentials. 4. Demand guarantees that your custom & investment only supports responsible water stewards.

Take 5 STEPS to a fair water footprint

If we manage our water resources wisely there is enough water for everyone, forever. To achieve this, we need a worldwide revolution for fairer water footprints. Our water footprints describe the total water used to produce the goods and services we consume. Each UK citizen has a daily water footprint of around 30 bathtubs, two thirds of which is used overseas or 'imported' as embedded water. This is 'other people's water', and our consumption can deny distant communities and ecosystems of the water needed to thrive.

To avoid perpetual and catastrophic water crises we must ensure that our water footprint is based on sustainable and equitable water use. The production of everything we consume - must be based on good water stewardship, which means:

- taking water from rivers, lakes and aquifers in step with natural replenishment to avoid resource depletion.
- pollution control and treating chemicals, sewage and industrial wastewater properly to avoid resource degradation.
- looking after water ecosystems and preparing for floods and drought.
- realizing the human right to water, so that everyone has access to clean water, toilets and handwashing facilities.

Multi-national companies and the investors behind them have phenomenal power to shape how water is used, and they respond to market forces, consumer demand, stakeholder, and shareholder pressure. By demanding that they adopt water stewardship you can make your water footprint fair. You can change the world's water use for good.

Join the global struggle for water justice:

- 1 Step up and speak out for water** - conserve water at home. Find out where your water comes from and where your wastewater goes. Make sure local water use is fair and demand change where there is injustice or ecological damage.
- 2 Demand good water stewardship** - from grocery stores, farmers, food and beverage producers, retailers and the brands you buy goods from. Ask companies that benefit from your custom to show their stewardship credentials through certification against the **Alliance for Water Stewardship Standard**, which guarantees good practice.
- 3 Ensure your investments and banks don't abuse water** - financial markets, banks, insurers and pension funds channel your money into companies to turn profit. Make sure they divest from water abusers and invest in water stewards who can be differentiated via **CDP's Water Disclosure Programme**.
- 4 Put pressure on government** - let your representatives know that you care about the issue, and demand their support for stronger legislation, oversight and investment to safeguard water, at home and abroad.
- 5 Join our Fair Water Footprint campaign.** Help us to investigate water footprints, to take action on water misuse and to activate water rights for communities. Visit <https://waterwitness.org/programmes/fairwaterfootprints> to sign up.

Please sign up here to join the Fair Water Footprints campaign to receive updates and information about what you can do to ensure a fairer water future of water justice for all.

Use your power to shape a fair water future through a fair water footprint!

