



15 November 2017

Dear Ged Sutherland,

Re: 13,606 citizens are calling on Schuh to tell them who made their shoes, and to stop endangering shoe workers

Labour Behind the Label is currently working within a coalition of 15 European and 3 Asian NGOs working to improve social and environmental conditions in global leather and shoe supply chains. We work with partners in producing countries – both inside Europe and globally – in raising public awareness of the poor working conditions in most shoe supply chains and at the same time encourage shoe brands and garment/shoe retailers to improve conditions within their own production chains.

We wrote you in April this year and again in June and September to ask you to follow the example of a growing number of garment and shoe brands, to show that you are willing to be held publicly accountable for conditions in your supply chain by making your supplier lists public. We also asked you to take action to improve safety, in particular for workers exposed to toxic chemicals during the leather tanning process.

On 8th May we launched a campaign involving a petition to shoe brands - including your company. 13,606 people call on you to:

- **Publish the names and addresses of all your suppliers**

t: 0117 9415844

a: The Easton Business Centre, Felix Road, Easton, Bristol BS5 0HE
w: www.labourbehindthelabel.org

e: info@labourbehindthelabel.org

- **Report on progress in moving away from dangerous chemicals**
- **Show that you are respecting the human rights of the people who make your shoes, ensuring fair wages and safe working conditions**

(see detailed demands below)

Our partners at UNISON Scotland will be visiting your head office on Monday 20 November at 12.30pm to hand over the petition to you, on behalf of the 13,606 people who have signed. They would welcome the opportunity to hand this over in person and to organise a photo.

We would also very much welcome a meeting to discuss transparency and improved working and environmental conditions in your supply chain, in more detail.

Transparency goes beyond the publication of supplier details – it requires regular reporting and data on suppliers but also on how conditions are monitored (audits etc.), social and environmental data such as the number of workers, wages, contract terms, chemicals used etc. Several global brands have made their supplier lists public, but only a few brands have publicised additional information like audit reports, action plans and wages. Precise state guidance and legislation is needed to make sure all brands make supplier information public and expand the scope of information to also include audit reports and corrective action, but it is also down to leading brands like yours to show that you are taking steps to identify and mitigate risks of human rights abuses in your supply chain.

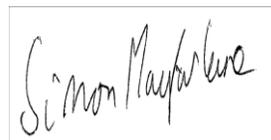
A full list of demands is again attached for your reference.

I look forward to hearing from you shortly.

Best regards,



Dominique Muller
Policy Director
Labour Behind the Label



Simon Macfarlane
Regional Organiser
UNISON

Annex: Full Change Your Shoes Demands on Transparency

For Brands

1. Report annually on the impact of their activities throughout the supply chain on human rights, including explicit reporting on due diligence processes, policies, and on the effectiveness of their responses to address the adverse impacts of their activities, using measurable indicators; ¹
2. Disclose the names, addresses and contact details of supplier facilities, subcontracted suppliers and labour agents managing home-working facilities, on an annual basis or more frequently;
3. Recognise and regulate home workers in the supply chain (new demand)
4. Publish social audit reports including Assessment findings including, wage levels, risk assessments, audit inspections of suppliers, and corrective actions plans.
5. Work alongside key stakeholders to report regularly on human rights impacts and their work towards protection, remedy, and remediation, where appropriate and in instances of adverse impact
6. To increase leverage, companies must cooperate with industry peers to resolve the problems with lack of transparency and worker's safety within the leather sector and provide full transparency and involvement of worker's representatives within multi stakeholder and business initiatives.

On Chromium

The leather and shoe industry must identify and remedy risks for workers and the environment in shoe production and tanning processes and regularly and publicly report on the remedies and processes used to ensure the safest way of production.

Companies must report on efforts to increase alternative tanning. If chromium tanning is used, companies must show use of state of the art technology.

European union and Country governments for other brand HQ Countries

1. Require that companies report, on an annual basis, on the effectiveness of their responses to address the adverse impacts of their activities on human rights, including in their supply chain.
 2. Require that companies disclose the names, addresses, and contact details of their supplier facilities, all subcontracted suppliers and labour agents managing home-working facilities, at least on an annual basis.
 3. Require that products sold within the jurisdiction are labelled to include a product code linked to a website that will provide information including supply chain traceability, employment statistics at the facility, economic information of the facility, pricing information and product information.¹
- Require that companies disclose their Human Right Risk Assessment findings, including wage levels, risk assessments, audit inspections of suppliers and corrective actions plans.

EU Directives and Labels

¹ Information should include more specifically: Supply chain traceability (Production place / facilities addresses, intermediaries, importer, brand), Employment statistics at the facility (number of workers at the facility and percentage men/women; average wage of each grade, average monthly overtime, benefits given, registered union and/or CBA presence, employment relationship information by percentage), economic information of the facility (turnover, number of pieces sold, % of factory product sourced per brand, price breakdown structure) and product information (Chemical products used, Certifications obtained and certification bodies).

Revision of Directive 94/11/EC to include the type of tanning (chromium or other) for inclusion on shoe label.

2. Ensure that all EU level and national level 'Eco' labelling of shoes bans chromium use and conforms to significantly higher than industry average standard with transparent and consistent guidelines on health and safety, the environment, and worker representation in conformity to ILO standards and recommendations.

EU Database

Operate a standardised shipping database at an EU level which stores records for all exports and imports of cargo entering European ports, noting the class of cargo, the trading names of the companies involved, the point of origin, the value as an FOB price and quantity, and the ultimate destination and recipient, and make this available by access request. Good examples exist in the US and Canada. For example, the US Import Genius Database that presents information from the US Customs.

Producing Country Governments

Governments of nation states where clothing, shoes and leather is produced have a duty under the UNGPs to make sure systems are in place to protect human rights. In our opinion, the promotion of this should include ensuring open and transparent data is available to encourage engagement in human rights protection and remedy.

Specifically: Require suppliers report on an annual basis on effectiveness of their responses to address the adverse impacts of their activities on human rights, supply chain traceability, employment statistics, economic information, and social audit reports.

Suppliers and Manufacturers

Suppliers as a primary employer have a direct responsibility to respect Human Rights in their facilities, and reporting on measures to ensure this is vital.

Specifically:

1. Disclose a buyer list, on an annual basis or more frequently;
2. Disclose the names, addresses and contact details of subcontractor facilities, and labour agents managing home working contracts, on an annual basis or more frequently;
3. Make available for the public social audit reports and information on: number of workers in each department and grade (including gender breakdown), number of migrant and juvenile workers, percentage turnover of workers, wage at each grade and by gender, number and percentage of short-term and/or contract workers, average overtime hours in a month, whether a collective bargaining agreement exists at the factory, existence of a worker complaint mechanism, number of grievances filed by workers, number of accidents causing injuries in the recent period, existence of a joint worker management committee to discuss grievances or complaints;
4. Appoint an individual at top level management responsible for social performance, and publish the contact information for this individual.

Ends.