October 8, 2020

Julie M. H. Brown
Director, Higg Index — Higg Product Tools
Sustainable Apparel Coalition
344 Thomas L Berkley Way #K7
Oakland, CA 94612 USA

Re: Suspension of the Higg Index MSI Score for Leather

Dear Ms. Brown,

I am writing on behalf of the International Council of Tanners (ICT), the global body representing producers of leather and comprised of the national associations of leather producers in the world's major leather-producing countries. The views expressed herein are also supported by the co-signatories, representing leather manufacturers and the advocacy groups, research and technical organisations and associations that represent them at the national and supranational level. As such, these comments are the collected and shared opinion of the global leather industry.

The undersigned request that the Higg Index MSI Score for leather be suspended, pending review of the underlying methodologies and data. While we recognise the need for and value of assessments of the environmental impacts of products, to inform the move towards more sustainable products, we believe that the use of inappropriate methodologies and out of date, unrepresentative, inaccurate and incomplete data, means that leather has been burdened with a disproportionately high Higg Index score. This has led to a negative perception of leather which does not reflect its sustainable, circular nature.

In the quest for improved sustainability, manufacturers will reference the Higg Index when designing products and making choices on materials. On the basis of current Higg score, these manufacturers are deselecting leather in favour of fossil fuel-derived, unsustainable synthetic products. As such, we believe that the reputation and viability of leather and leather manufacturers is being unfairly damaged by an assessment that does not reflect the true nature of leather or indeed, the alternatives.

There are several areas of concern in the current basis for the Higg Index score for leather. The following are some of the most important issues reported by industry stakeholders:

- The score is based on datasets that use data from no later than 2013 and are therefore, not representative of the current status of the leather supply chain. This is particularly relevant to the impact of livestock rearing and the use of economic allocation to determine the environmental burden carried by hides and skins.
- The data refer to Brazilian and US herds only and as such, do not reflect the varying impacts of the different farming methods used in the rest of the world,
- The lifespan of cattle is assumed to be five years which, in the case of beef animals, will significantly increase the apparent environmental impact. As the lifespan of a typical beef

animal is usually between 12 and 36 months, the apparent impact under the Higg Index will be significantly larger than the real impact.

- The score does not differentiate on the type of leather produced, e.g. no account or allocation is made for splitting of hides into grain leather and suedes.
- The use of inappropriate multiplication factors artificially distorts the Eutrophication and Resource Depletion scores for all natural fibres, including leather, compared to synthetic materials.
- The methodology for the assessment of the impact of Chemistry is not transparent, but places a significant burden on leather and all other natural fibres.
- The assessment for climate impact does not take account of advance in climate studies and in particular, GWP*, which recognises the biogenic, short-lived and circular nature of methane emissions from cattle.
- The assessment is cradle-to-factory gate only and as such does not recognise the critical use and end-of-life phases of a product. A recent study on wool products found that 'the number of times a wool garment is worn and length of garment lifetime has comfortably the largest influence on its overall environmental impact'. Similarly, leather products are durable, long-lasting and repairable yet this is disregarded in the current Higg assessment.

On the last point, we understand that the new Higg Index Product Module will eventually include assessment of the environmental impacts of a product, from factory gate to end of life. However, until this Module available, the score only tells half of the product story, which can be very misleading for users and consumers. By way of analogy, if the Higg Index were applied to cutlery, a single-use plastic fork would be scored more sustainable than a metal one. As such, the score should be suspended until this Product Module is complete and supporting data is updated.

More troubling is the lack of transparency on the basis for score and the lack of engagement with the wider leather industry to ensure that the data used is accurate. A viable and transparent alternative would be for the Higg Index score to be derived using the EU Product Environmental Footprint Category Rules (PEFCR) for Leather. The PEFCR have been developed and adopted by a credible and independent inter-governmental organisation, the European Commission, in consultation with the industry and using current and reliable datasets.

Leather manufacture takes a waste from another industry and transforms it into a durable, versatile and sustainable product. As a result of a number of factors, including multiple campaigns of disinformation, demand for leather has fallen and we are now seeing vast amounts of renewable raw hides and skins simply being thrown away. It is estimated that as much as 16% of the cattle hides produced in the USA (5.5 million) were disposed of to landfill in 2019, with the negative environmental consequences this entails. In Brazil, a similar number have been diverted to lower value destinations, such as collagen and gelatine. Regrettably, the flawed Higg Index score for leather is one of those factors that has brought us to this point. It is hard to imagine that those companies using the Higg Index would want to be associated with the unnecessary waste of a sustainable, renewable and recyclable raw material.

For the reasons given, we request that the Higg Index score for leather is suspended. We would welcome the opportunity to discuss the basis for the score, to provide the necessary data and assist with development of appropriate methodologies, to address its shortcomings. Sustainability in products is an admirable and necessary ambition but it can only be achieved by

informed and balanced consideration of the whole story of those products. At this time, it is clear that leather is not being given that consideration.

Our thanks in anticipation of your cooperation on this pressing issue

Yours,

Kerry Senior
Secretary, International Council of Tanners

Co-Signatory Organisations:

Australian Hides, Skins and Leather Exporters Association (ASHLEA)
Centro das Indústrias de Curtumes do Brasil (Brazilian Tanners Association – CICB)
Confederation of National Associations of Tanners and Dressers of the European Community (COTANCE)
International Council of Hides, Skins and Leather Traders Association (ICHSLTA)
International Union of Leather Technologists and Chemists Societies (IULTCS)
L'Unione Nazionale Industria Conciaria (Italian Tanners Association – UNIC)
Leather and Hide Council of America (LHCA)
Leather Naturally
Leather UK
Leather Working Group (LWG)
One 4 Leather
Society of Leather Technologists and Chemists (SLTC)