



FACTORY ENVIRONMENTAL STANDARDS

At Dr. Martens, we partner with key suppliers to manufacture the majority of our footwear and accessories. Our supply chain operates on a global scale and we want to ensure its environmental impact is managed properly and reduced where possible.

Operational factors which can have an impact on the environment include but are not limited to: energy use, air emissions, water consumption, waste management and chemical use. If factors such as these are managed correctly, any negative impact to the environment can be minimised and suppliers can benefit from increased efficiency, cost savings and positive business reputation.

These standards set out the principles that all Dr. Martens approved footwear and accessories suppliers must respect in order to operate in an environmentally responsible manner. These should be considered as minimum requirements and suppliers may be required by law or other means to achieve a higher standard of performance.

Compliance will be monitored by regular audits. Suppliers are also encouraged to adopt an approach of continuous improvement by implementing incremental changes in order to achieve best practices.

1. Legal Compliance

Failure to comply with environmental law is a serious regulatory and reputational risk for both suppliers and brands.

- a) Supplier must comply with all relevant environmental protection laws and regulations in the countries in which they operate. It is recommended that suppliers maintain a regulatory register to ensure they remain abreast of relevant environmental laws.
- b) Supplier must be properly licenced, registered and ensure all required environmental permits are in place. These can include a general operating permit, water abstraction, water discharge, air emissions, solid waste disposal and storm water and chemical purchase / storage permits.
- c) Supplier must have suitable internal policies and procedures in place which routinely identify and mitigate operational risks to the environment and human health. Supplier must ensure environmental procedures are regularly reviewed, updated, implemented and communicated to staff.
- d) Supplier must inform Dr. Martens of any written cautions, warnings, prosecutions or other form of regulatory action taken against the company within 30 days of issue.

2. Emergency Procedures

It is vital that effective emergency procedures are implemented within a facility and communicated to all employees, to ensure critical events are dealt with appropriately and in a timely manner.

- a) Supplier must review all activities that take place within the facility and prioritise the most critical based on risk to workers' health and the environment. Critical activities could include but are not limited to; chemical handling, hazardous waste management and using specific machinery or tools.
- b) Supplier must define written emergency procedures for all critical activities. Emergency procedures must be communicated to staff and practiced regularly. They must be reviewed and updated when necessary.



3. Restricted Substances

Regulations within many countries limit or prohibit the use of certain harmful substances in the manufacture of products and materials. Dr. Martens suppliers are legally required to comply with these regulations to ensure protection of human health, the environment and brand reputation.

- a) Supplier must adhere to the Dr. Martens General Materials Requirement Policy (GMRP). If local or national laws relating to restricted substances are stricter than the GMRP, these should take precedence.
- b) Supplier must ensure a written restricted substances management system or procedure is in place which explains how they comply with Restricted Substance List (RSL) requirements from their customers, including Dr. Martens.
- c) Supplier must have their own internal restricted substance specification which their other customers should follow if they do not have their own.
- d) Supplier must have a procedure in place for when a chemical or material in a shoes construction is substituted by an alternative. The product range affected should be subject to a new restricted substance risk analysis.
- e) Comprehensive third party testing for restricted substances must be carried out by a Dr. Martens approved laboratory. For more information on third party testing and restricted materials, please see the Dr. Martens General Materials Requirement Policy.

4. Energy Management

Good energy management is integral to running an efficient facility. Monitoring energy use and implementing improvements can lead to a more reliable energy system and cost savings.

- a) Supplier are expected to track and monitor their monthly energy consumption.
- b) Energy information to be collected on a monthly basis includes but is not limited to; energy consumption total, energy type (e.g. electricity, natural gas, diesel, solar etc.), unit of measurement, the date the reading was taken and the area of the facility the reading is for. Records should be maintained and kept on file for a minimum of two years. Energy use should be reported as energy used per pair produced for shoe supplier factories.
- c) Supplier should investigate unexpected trends or spikes in energy use. Issues should be rectified as soon as possible.
- d) Supplier should share energy consumption data with Dr. Martens if requested and respond to any queries regarding the data in a timely manner. Environmental data provided by supplier may be benchmarked and reviewed against other Dr. Martens approved suppliers' data.
- e) Supplier should aim to reduce their energy consumption by setting and working towards energy reduction targets.
- f) An energy management review should be carried out annually to identify inefficiencies in the system which once fixed, could lead to a reduction in energy use and cost savings.
- g) Suppliers encouraged to explore the use of renewable energy sources, such as solar or wind.

5. Water Management

Correct water management minimises regulatory risks and helps reduce localised water shortages. Regularly monitoring water consumption means inefficiencies and issues can be identified more quickly.

- a) Supplier are expected to record their monthly water use and must have a water meter installed.
- b) Information to be collected on a monthly basis includes but is not limited to: volume of water used, water source (e.g. municipal, groundwater well, etc.), unit of measurement, the date the reading was recorded and the process the reading covers (e.g. process, domestic, drinking etc.). Records should be maintained and kept on file for a minimum of two years. Water use should be reported as water used per pair produced for shoe supplier factories.
- c) Supplier should investigate unusual water readings and any issues that are identified should be rectified as soon as possible.



- d) Supplier should share water use records with Dr. Martens if requested and respond to any queries regarding the data in a timely manner.
- e) Supplier factories should aim to reduce their water use by setting water reduction targets.
- f) Supplier should carry out a water management review annually to identify inefficiencies in the system.

6. Wastewater Management and Effluent Treatment

Wastewater can be described as effluent consisting of domestic water, wastewater from commercial establishments, industrial effluent, storm water or other urban run-off¹. Effluent can be hazardous and must be treated before it is released back into the natural environment to protect sensitive water bodies and human health.

- a) Supplier must ensure all discharge permits are in place and effluents from all facilities meet all legal discharge requirements and / or comply with the ZDHC Wastewater Guidelines, whichever is more stringent. Wastewater discharge must be tested for guideline compliance at least twice a year.
- b) Supplier should monitor the outgoing water volume.
- c) All wastewater must be treated on or off site before it is discharged back into the natural environment. A septic tank is sufficient for treating domestic water, however process effluent must be treated at a specialised effluent treatment facility. Treatment may occur on or offsite, such as at a common effluent treatment plant.
- d) Supplier must ensure there is a suitable mechanism in place to prevent wastewater mixing with storm water.
- e) Common activities within a factory such as chemical storage and equipment handling can cause pollutants to leak from a facility into storm/rain water. This can then flow into sensitive bodies of water such as rivers, ponds and the ocean which poses a risk to the environment and human health. Containers which hold pollutants such as chemicals should be kept in good condition and stored within secondary containment Supplier should carry out regular inspections of equipment and factory buildings to guarantee effective storm water pollution prevention.
- f) All employees who work with pollutants should be given training on spill response and pollution prevention to minimise the risk of a pollution event and ensure an effective response and clean up.

7. Air and Noise Emissions

Supplier should ensure sufficient air emission control measures are in place across the facility. High risk areas must be monitored regularly to ensure harmful substances are not released into the atmosphere.

- a) Supplier must operate in compliance with all emissions regulations and ensure all required air and noise emission permits are in place.
- b) Supplier must have an up-to-date air emission inventory which details all points of forced emissions to air (e.g. boiler stacks, gluing stations, dust extractors etc.). A good inventory will also detail the results of environmental aspects and impacts assessments made upon those emissions.
- c) Plant emission sources (e.g. stacks and vents) must be fitted with control devices where required and should be inspected regularly to ensure they are in good working order. Any air emissions resulting from processes such as coating, painting, spraying and printing must be filtered in line with regulations.
- d) Heat sealing machines produce hydrogen chloride. If used, they must be fitted with an on board extraction pipe, as well as foam and activated carbon filters. All filters must be replaced regularly at the appropriate frequency as detailed in the filter change schedule. Please refer to the Heat Sealing Operation Manual for more information.
- e) Annual air emission testing of stacks, boiler stacks and other high risk areas must be carried out by a third party and the reports kept on file for a minimum of two years.
- f) Supplier with an onsite incineration plant should ensure the machine is equipped with air pollution control, all required permits are in place, all permit conditions are met and that the incineration waste is disposed in the correct manner

¹ <http://www.unwater.org/publications/wastewater-management-un-water-analytical-brief/>

at a licenced facility. Onsite incineration plants should be emissions tested on a monthly basis. Incineration of waste or by-products in a regulated co-generation plant is preferential to incineration which does not generate energy.

- g) All materials and substances which produce air emissions must be stored in air tight containers in a well ventilated area.
- h) Ideally factories should be located so that external noise level monitoring is not required. If noise monitoring is required, it should be carried out three times per year at several periods of the day and in several locations.
- i) Supplier must ensure they have a written procedure in place to record and manage complaints from the public. All complaints must be investigated and acted upon and records should be maintained and kept on file for future reference.

8. Chemical and Solvent Management

Supplier must ensure chemicals used during the manufacturing process are managed correctly. Many could be hazardous and could be a risk to human health if handled, stored, or used incorrectly.

- a) Supplier must have an internal chemical safety programme, emergency response procedure, inventory list and Material Safety Data Sheets for all chemicals present within the facility. These must be reviewed regularly and updated when there are any changes to the inventory. Supplier must also maintain a record of incidents and accidents.
- b) Supplier must maintain and update when necessary a facility map showing the location(s) of chemical storage, chemical use, chemical disposal, including packaging and drains etc.
- c) Supplier must carry out a risk assessment for each employee working with chemicals to define the required personal protective equipment (PPE) and recommend best practice handling procedures.
- d) Supplier must provide training to workers if they are exposed to hazardous chemicals. Regular and ongoing training must also be given following the initial session. Employees who handle chemicals must wear PPE as outlined in the chemical safety guidelines.
- e) The total amount of pure solvents and solvents forming a constituent of chemicals used should be recorded on a monthly basis.
- f) Volatile organic compound emissions (expressed as grams of solvent emitted to the environment per pair) must also be recorded and monitored based on the volume of solvents used.
- g) All chemicals and hazardous substances and storage areas must be identified and labelled with warning signs (see Figure 1). Only authorised members of staff may access chemical storage areas.
- h) All chemicals must be stored in a locked and well-ventilated area, located away from storm water drains. Hazardous chemicals must be stored in secondary containment which should be 10% of the total volume of the chemicals or 110% of the single largest container, whichever is greatest. Combustible and flammable chemicals must be kept separate from oxidising chemicals, reactive chemicals and electrical items.
- i) Chemical spill kits or absorbents must be kept in close proximity to chemical storage areas. Emergency showers and eye wash stations must also be kept near to chemical storage areas for easy access and these should be inspected monthly.



Figure 1: Hazard symbols



9. Waste Management

Effective waste management minimises risk of environmental harm, can lead to cost savings and protects business reputation. Waste is classified as hazardous and non-hazardous; the following requirements are applicable to both waste types.

- a) Supplier must have a formal waste management procedure in place. This should include written guidelines regarding the identification, collection, storage and disposal of hazardous and non-hazardous wastes. The individuals (names and positions) within the factory for management of hazardous and non-hazardous wastes should also be outlined.
- b) The waste management plan should make reference to and comply with all applicable national, regional and local laws and any other applicable regulations. Procedures should be reviewed and updated on a regular basis to ensure they remain up to date.
- c) Supplier must only use registered and licenced waste carriers for waste collections and waste should only be disposed at licenced end destination sites. If applicable, factories must follow their local requirements for recycling waste segregation.
- d) Within the facility, hazardous and non-hazardous waste must not be mixed and should be stored, collected and disposed of separately.
- e) Supplier should monitor their waste disposal records. This information should include the waste type, volume, unit of measurement, date of collection or disposal from facility, details of the waste collection contractor and the disposal method (e.g. reuse, recycling, landfill, etc.). These records should be kept on file for a minimum of two years for non-hazardous waste and a minimum of three years for hazardous waste.
- f) Supplier should manage all waste following the order of reduce, reuse, recycle, recover, disposal (in order of preference, with reduce as most preferable and disposal as least). Supplier should create and implement a strategy to prevent and reduce waste at source. Waste which cannot be prevented should be reused or sent for recycling. If neither of these options are viable, waste should be sent for energy recovery or disposal. Landfilling of waste is the least preferable option and should be avoided if possible.
- g) Factories should follow these suggested disposal methods for each waste type when possible:
 - Dr. Martens branded waste (e.g. soles, tags, etc.) must not be disposed in landfill or with general waste and should follow Dr. Martens' representative's instructions.
 - Material waste should be recycled or reused where possible.
 - Thread cones should be returned to the manufacturer for reuse.
 - Cardboard boxes should be recycled or reused if undamaged.
 - Wooden crates and pallets should be returned to the supplier for reuse, or recycled if broken.
 - Glass, plastic and aluminium should be recycled. Local requirements for recycling these materials such as segregation must be identified and managed correctly.
 - Containers which have previously held hazardous materials should be considered and treated as hazardous waste (please see Section 9: Hazardous Waste).
 - Waste electronic equipment such as computers or sewing machines should be recycled rather than being disposed of in landfill.

10. Hazardous Waste Management

In a factory, hazardous waste should be managed in a way that minimizes the risk of exposure to workers or contaminating the environment. Hazardous waste must not be mixed with non-hazardous waste and should be stored, collected and disposed of separately.

- a) Examples of hazardous waste includes but is not limited to: spent chemicals such as bleach and caustic cleaners, used oil, used batteries, used fluorescent lamps, electronic equipment, pesticides, ballasts and medical waste.
- b) Supplier must have written procedures in place to safely deal with hazardous materials and waste. Supplier should implement an emergency response plan which can be used in the event of a spill or other contamination event. These



should be communicated to workers and reviewed on a regular basis. Workers who handle or transport hazardous materials and waste must receive regular training about the associated hazards.

- c) Supplier must only use registered and licenced hazardous waste contractors and waste should only be disposed at licenced end destination sites. Factories which transport their own hazardous waste and materials must also have written procedures to safely transport hazardous materials.
- d) Supplier should audit their hazardous waste contractor, recycler and disposal sites to ensure they are processing the waste in an appropriate and safe manner. Copies of audits must be kept on file for future reference.
- e) Supplier should keep copies of the hazardous waste disposal records for a minimum of three years. Factories must also keep written records of employee training, transporter permits and licences and hazardous material and waste shipping documents.
- f) Supplier should record and track the type of hazardous waste they generate. This information should include the waste type, volume, unit of measurement, date of collection or disposal from facility, details of the waste collection contractor and the disposal method (e.g. reuse, recycling or landfill). These records should be kept on file for a minimum of three years for hazardous waste.
- g) Hazardous waste should be stored in labelled, good condition containers, which are compatible with the hazardous content. These should be stored indoors, in a labelled, locked, and properly ventilated area, with secondary containment and located away from storm water drains.
- h) Following the waste hierarchy, supplier should make efforts to reduce hazardous waste and materials where possible. For example, non-toxic cleaners and citrus based solvents can be used as alternatives. Supplier should also seek to recycle as much hazardous waste as possible.

11. Housekeeping

Good housekeeping prevents injuries, can improve productivity and is vital for the operation of a well-managed and efficient facility.

- a) A traffic management system including a written document and site map should be in place to control vehicle and pedestrian movement within the site. Walkways should be clear of obstructions. Work in progress items should be stored in an orderly manner.
- b) Equipment should be stored in defined areas in an orderly manner. All materials, including wastes, solvents and chemicals should be stored in an appropriate manner – please see relevant sections within the policy for more information.
- c) Machinery should be regularly cleaned and kept in good working order. The facility buildings and grounds should be clean and tidy at all times.

12. Plastic

Plastic is used to protect, preserve and present products but plastic is polluting when not managed. There are actions we can all take today to make a difference for tomorrow.

- a) Use less: wherever possible, suppliers are expected to use less packaging across their business. This includes single cups, plastic cutlery, cafes, bags etc.
- b) Recycle more: where supplier choose to use plastic because there is no viable alternatives, make sure it is non-coloured and fully recyclable. Supplier are expected to reduce the use of non-recyclable mixed materials.



Factory Environmental Standards Statement of Acknowledgement

We acknowledge receipt of the Dr. Martens Factory Environmental Standards. We confirm that we have read and that we understand these standards and will actively strive to ensure are met in our production sites.

Factory.....

Name.....

Signed.....

Position.....

Date.....