

## Frequently Asked Questions

### 1. What is Eco or Environmentally preferred leather?

There are no official characteristics that determine whether leather can be classed as an ECO-leather. This language is typically marketing or consumer communication versus an actual classification of the leather type.

Our belief based on extensive research and industry knowledge that environmentally preferred leather can be defined by two key parameters:

- A. How the leather is manufactured
- B. What inputs are used to manufacture it

Careful research has shown that a significant part of the environmental impact of leather is in the manufacturing processes, taking it from a hide to finished leather. This protocol has been designed as a comparative analysis tool that can be used to assess the environmental stewardship practices of tanners. We believe that isolating one input substance, a tanning agent for example, from a process that uses hundreds of chemical substances is not meaningful when claiming that one leather is environmentally preferred over another. We believe that assessment of a supplier's environmental performance and providing transparency into best practices for leather manufacture is a significant and meaningful first step that the industry can support.

The end use of a leather product determines its performance and aesthetic requirements. These requirements will determine the process and inputs used in the manufacture of suitable leather. The opportunities to optimize leather processing are extensive, and the variations make industry collaboration challenging but, nevertheless, possible.

### 2. What is organic leather?

This term is sometimes used for leathers that are not tanned with mineral tanning agents. It is highly ambiguous and has led to the false belief in some quarters that the skins or hides have come from organically reared animals

### 3. Is chrome free leather better than chrome containing leather?

These two types of leather have different properties and each have their own market position. Lifecycle analyses have indicated that different tanning agents all have environmental impacts, but different ones. It's up to individual values to decide which impacts are higher priorities over others. Also, LCA work has shown that significant impacts occur throughout the leather making process, not just when the article is tanned.

**4. What is the scoring system based on?**

The scoring system is based on several benchmark studies undertaken by BLC Leather Technology Centre Ltd and involving over 40 tanneries in five leather manufacturing sectors around the world. It aims to reflect environmental impact and has drawn on published data such as the European Commission Reference Document "Best Available Techniques for the Tanning of Hides and Skins" (May 2001) and United Nations Document US/RAS/92/120/11-51 "The scope for decreasing pollution load in leather processing"

**5. How has the grading system been developed?**

To achieve a given grade a minimum score in each area is required. The system of scoring for awards has drawn on some of the concepts used by the International Safety Rating System (ISRS), a health and safety management system promoted and supported worldwide by Det Norske Veritas (DNV). That health and safety management system is based on a series of safety audits which comprise a number of sections with some 600 questions. Each answer is individually scored and finally the scores are aggregated. Five standard levels are used in the ISRS approach whereas Gold Silver and Bronze are used in the Leather Working Group approach.

**6. Are tanneries processing from raw skins penalised due to the additional waste they create?**

The scores for the manufacturing sections are rationalised so that tanneries are compared on their overall manufacturing operations, not on the individual components of those operations

**7. Do tanners operating in regions with stricter environmental legislation score differently?**

The aim of the protocol is to ensure that tanners across the world are assessed against a common framework. The protocol is based on environmental compliance and environmental stewardship and therefore all tanners are expected to be in conformance with local regulations or with protocol requirements, whichever are the more stringent.

**8. Do tanners with their own effluent treatment plants score more highly?**

The greater the effort that a tanner takes to reduce environmental impacts whether by reducing usage of environmental resources such as water or energy, or by reducing the level of emissions to the environment gaseous, solid or liquid, the higher will be the score on the protocol.

**9. Can an auditor terminate an audit if standards are found to be too low?**

The audit will not be terminated although a low score would not result in the award of a grade. If the tanner cannot provide evidence of adherence to operating permits in advance of the audit the audit may not be commenced

**10. What feed back does a tanner get from the audit?**

We hope that the auditor will provide a verbal report at the end of the audit to whichever representatives the audittee wishes to appoint. A good auditor should provide constructive advice regarding elements that could be improved upon and about any elements of the audittee's operations that are observed to require immediate attention. A copy of the completed audit should be provided with a commentary on the performance of the audittee and relevant recommendations for improvement

**11. How frequently should I have an audit?**

We recommend that an audit be conducted every 18 months

**12. What documents need to be made available?**

Copies of valid operating permits will need to be made available in advance of the audit. The auditor will contact the company to be audited in advance of the audit to ascertain which regulatory authorities are responsible for issuing permits

**13. Will a tannery group require more than one audit?**

The audit is an assessment of the site, not the organisation; therefore, where an organisation has multiple sites each site should be audited

**14. Will the type of leather produced affect the audit result?**

The audit has been designed to assess the performance of the tanner with respect to leather manufacture; the type of leather produced has no bearing on the result. The use of environmentally unfriendly materials where cleaner alternatives exist, however, could affect the result

**15. Will the scale of operation (size or output of the tannery) affect the audit result?**

Factors such as air emissions, energy consumption etc are determined per unit of leather produced, not gross values.

**16. What is the correct level of restricted substance testing?**

The correct level of testing, whether it be for restricted substances or any other property, remains subject to agreement between the individual supplier and customer. This protocol aims to assess the tannery's system for managing restricted substances.

**17. Can the audit protocol be used to improve performance?**

The tanner undergoing audit is provided with a copy of the assessment so that it is possible to identify those aspects which score less highly. The auditor will necessarily be a leather technologist capable of giving advice on the best means of achieving improved performance. This advice will be given at both the verbal debrief and in the audit report.

**18. Is it advantageous for the tanner to be accredited by any other scheme such as ISO14000 or EMAS?**

A company that operates according to an internationally recognised scheme and which is accredited as being in compliance by an independent third party will be given due credit and will score more highly than a company operating a self-certified or self-designed management system.

**19. Our Organisation is already certified to ISO 14001. In what way is this different from the LWG audit?**

ISO 14001 and the LWG audit do not assess environmental performance in the same terms. The LWG audit quantifies environmental performance whereas the ISO standard does not. The operation of the ISO (or other) standard is a component part of the LWG protocol. The ISO standard relates to the management system and is explicit in not attempting to quantify environmental performance, indeed, in the introduction it states "This International standard does not establish absolute requirements for environmental performance beyond the commitments, in the environmental policy, to comply with applicable legal requirements and with other requirements to which the organisation subscribes, to prevention of pollution and to continual improvement. Thus, two organisations carrying out similar operations but having different environmental performance can both conform to its requirements" (our italics). It further states "...adoption of this standard will not in itself guarantee optimal environmental outcomes".

In contrast the LWG audit proclaims "The purpose of this [LWG] tannery auditing protocol is to evaluate the environmental performance of tannery operations" The LWG protocol assesses tannery operations in absolute terms, for example energy requirement to produce a square foot of leather, proportion of wastes recycled etc. In a third-party pre-publication peer review the World Wide Fund-US (WWF) reported "The Protocol has also admirably emphasized management by metric measurement in almost every phase of processing" and "As described above, measurement is one of the strongest aspects of this Protocol. It gives good performers credit for what they have already done, an issue that many standards processes have not resolved to the satisfaction of new entrants. It will allow tanneries and leather finishers to demonstrate their baseline level of performance, improve it systematically, and report measurable results. It will also allow participating tanneries to report on an aggregate and a cumulative basis the levels of impacts of their operations on the local environment, and could even lay the basis for carbon or water rights trading regimes in this sector."

**20. What is the audit duration?**

Audit duration is typically two days per site.

**21. Will information from third party organisations be required?**

A certain amount of information, such as copies of permits from regulatory authorities issuing operating permits, third party restricted substance test reports etc will be required. The auditor will advise the auditee well in advance of the audit what documents will need to be examined.

**22. Are there sections that lead to automatic failure in the audit?**

If Operating Permits apply to the facility for which the facility is unable to demonstrate compliance automatic failure of the audit will result, irrespective of how well other sections of the protocol score. Gross failures can occur in relation to operating permits and two aspects of effluent treatment.

**23. What happens if my score just misses making a grade?**

The distinctions between grades are based on calculations of what tanneries are capable of achieving and on test audits undertaken in the development of the protocol. Some of the assessments are, however, necessarily subjective, therefore in the case of borderline score the auditor may make a recommendation based on the overall observations that an award be granted provided that the company being audited agrees to undertake agreed corrective actions.