Public Comment period for Raw Materials Sourcing in Apparel project

Question 1: Does the proposed change to the “priority raw materials” definition in the qualitative metric (CG-AA-440a.1) improve (1) alignment with common industry practices and guidance, (2) cost of implementation for companies, and (3) usefulness of disclosures?

Answer: Yes, they are. It is emphasized quite transparently.

Question 2: Do you agree with the rationale to structure metrics by priority raw material (e.g., cotton, leather, etc.) versus by another component such as sourcing region or environmental/social factor (e.g., water scarcity, animal welfare, etc.)?

Answer: No, I don’t. This is because that environmental/social factors are more crucial than structure metrics.

Question 3: Do the proposed changes to the quantitative metric (CG-AA-440a.2) improve the comparability, completeness, and usefulness of disclosures?

Answer: Not exactly, this is because it should be more detailed.

Question 4: The Board considered two approaches to revise the list of certifications/standards included in metric CG-AA-440a.2. Do you have a preference between the two approaches, and if so, why? What principles would you consider when evaluating the credibility and/or selection of third-party certifications/standards?

Answer: Yes, I’ve a preference. My preference is an illustrated one. This is because that it is more secure. Priority should be ESG disclosures and risk analysis.

Question 5: Do you agree with the Board’s conclusion to not expand the scope of the Raw Materials Sourcing disclosure topic to include materials used for packaging?

Answer: No, I don’t. This is because that everything should be taken into consideration. Every detail is always crucial.

Question 6: Do the proposed changes improve the usefulness of disclosures for companies identified in the industry scope (companies involved in design, manufacturing, wholesaling, and retailing)?

Answer: Yes, it is.