



4 June 2024

(By Email)

The Cambodian League for the Promotion and Defense of Human Rights

Attn: Naly Pilorge - Outreach Director

Dear Naly,

### **Unauthorized Waste Disposal - Cambodia's Brick Kilns**

I am following up on our communications from last year, where you raised concerns over garment waste being burnt in brick kilns in Cambodia.

The purpose of this letter is to provide you with a recap of the actions we have taken and to share with you the findings from our own investigations.

On receiving your complaint, we reached out to the other brands who had been named in your advocacy report and together we sought the support of American Apparel & Footwear Association (AAFA) to raise your issues directly with the Cambodian government.

Subsequently, on December 18<sup>th</sup>, 2023, a letter was issued by AAFA calling for the Cambodian government to take proactive steps to:

- Re-double efforts to inspect brick kilns and ensure compliance with Cambodia's labor/environmental laws;
- Evaluate waste disposal pathways and ensure compliance with all applicable waste disposal rules and regulations;
- Support initiatives to improve/expand Cambodia's waste disposal system.
- Secure the release of bonded laborers in the brick kiln industry from their debt.
- Make efforts to transfer any child laborers in the brick kiln industry to appropriate schooling.
- Support brick kilns in addressing occupational safety and health as well as environmental impacts; and
- Engage, as needed, the International Labor Organization (ILO) and other international institutions to support the transition to more responsible practices.

The Government responded at the end of January 2024 stating that it would be taking targeted action in high-risk sectors, such as the brick kilns, to address these issues.



In parallel, adidas investigated and assessed the waste disposal practices being followed by our suppliers in Cambodia. Having conducted a thorough review of all current waste disposal contracts, agreements and onsite practices, we have concluded that:

- All waste generated by our suppliers in Cambodia is strictly following adidas' waste management guidance, with detailed waste records being maintained and reported by the factories.
- All our suppliers have maintained formal contracts with various entities: recyclers, waste co-processing (energy recovery) and/or waste collectors. These entities are certified or accredited by the local authorities, ensuring the responsible waste management practices.
- None of our suppliers have had any kind of commercial or business relationship with the brick kilns and none of our suppliers have sent waste directly to the kilns.
- Where garment waste has been found outside of the normal disposal route, it is due to the unauthorized diversion by the waste collectors, or their subcontractors.
- The controls and regulation of these operators falls to the government, not to the manufacturers. This has been raised with the government through the AAFA's December 2023 letter.

On our part, we have asked our suppliers to be extra vigilant and strengthen their waste management contracts, to prohibit the subcontracting of waste collection services and third-party waste transfers.

We have also asked our suppliers to continuously check that all vendors have the required government certification and accreditation. We will be issuing additional guidance to our suppliers in due course to reinforce these requirements.

We will remind the Government that it has committed to improve the situation for the workers at the brick kilns and we hope the collective messaging from the apparel industry, and specifically from AAFA, has helped in that regard.

If you have any additional questions, please do not hesitate to contact me.

Sincerely,