DEFEND OUR HEALTH

Solutions for a Toxic-Free Tomorrow

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DEFEND OUR KIDS FASHION SCORECARD 2025

Ranking of 10 kids' apparel brands on their efforts to reduce chemicals and plastics of concern

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ABBREVIATIONS

AAFA	American Apparel and Footwear Association
AFIRM	Apparel and Footwear RSL Management Group
ESG	Environmental, social, and governance
GOTS	Global Organic Textile Standard
MRSL	Manufacturing restricted substance list
PFAS	per- and polyfluoroalkyl substances
PFC	Perfluorinated chemicals
PVC	Polyvinyl chloride
RSL	Restricted substances list
ZDHC	Zero discharge of hazardous chemicals

ACKNOWLEDGEMENTS

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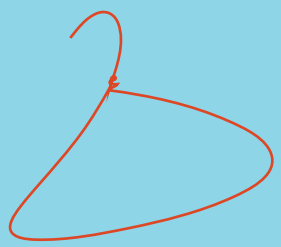
Designer: Pine Street Publishing LLC



FINAL SCORES

COMPANY	LETTER GRADE	PERCENTAGE
H&M	B+	61.5 %
RALPH LAUREN	B	56.4 %
HONEST®	B	56.1 %
GAP	C+	44.3 %
carter's®	C	36.5 %
PRIMARY	C	35.5 %
THE CHILDREN'S PLACE	C-	28.5 %
Gerber® Childrenswear	D+	21.3 %
hanna Andersson	D-	13 %
JANIE AND JACK	F	0 %

EXECUTIVE SUMMARY

The 2025 Defend Our Kids Fashion Scorecard is the first annual ranking on the progress of select kids' apparel companies to reduce the use of potentially toxic chemicals and plastics in fibers and product packaging. Children and infants can be more vulnerable than adults to these chemicals because their brains and organs are still developing, they receive a higher dose due to their lower body weight, and they tend to put their hands in their mouths more than adults. Moreover, most plastics, used in packaging and as clothing fibers such as polyester, can add to the overall load of potentially dangerous chemicals a company is using. The majority of plastics are made from fossil fuels using polluting manufacturing processes that can harm nearby communities with chemical emissions to the air and water.[1] Fossil-fuel derived plastics may inherently pose risks to health tied to the oil and gas source material,[2] and microplastics shed from plastic products may pose health risks to humans.[3] **Because of this, we believe that baby and children's apparel companies should take steps to reduce and if possible eliminate the use of chemicals of concern in manufacturing and packaging in order to protect the health of customers and the communities adjacent to sites of production.** This scorecard examines efforts to reduce all chemicals of concern, including efforts to eliminate PFAS, ortho-phthalates (phthalates), and PVC, as well as initiatives to reduce the use of plastic in fibers, such as polyester, and in packaging.

The problem of potentially toxic chemicals in apparel and shoes has made sporadic headlines in recent years. Testing of certain products sold by Shein and Temu revealed phthalates, formaldehyde, and lead at levels much higher than some jurisdictions' legal limits.[4,5] Parents and caregivers have also had concerns about flame retardants in kids' sleepwear because the U.S. government requires that children's sleepwear be either flame-resistant or tight-fitting.[6] Flame retardants can raise concerns of neurotoxicity and, depending on the type of flame retardant, endocrine disruption, carcinogenic effects, and possible disruption to bone health.[7] Due to the high level of concern around flame retardants and the availability of alternatives, most leading apparel brands have likely stopped using them.[8]

Toxics in clothing can enter the human body in a number of different ways, including dermal absorption, inhalation, and ingestion.[9] While the main route of exposure for toxics in clothing is dermal — many chemicals can be absorbed through skin[10] — chemicals can also enter the body through inhalation of dust particles or chemical vapors.[11] Young children and babies are particularly vulnerable to exposure through ingestion due to their increased mouthing behavior, which can lead to a higher transfer of harmful substances from the clothing into the body.[12] Exposures caused by clothing also contribute to the cumulative impacts of chemicals over time. For example, PFAS and microplastics have already been found in nearly every child,[13,14] making it even more important to limit further intake and minimize long-term health risks.

Apparel brands have taken collective steps in recent years to clean up supply chains after public pressure exposed pollution from manufacturing, often associated with the dyeing process.[15] ZDHC (Zero Discharge of Hazardous Chemicals)[16] was formed in 2011 and developed the Manufacturing Restricted Substances List (MRSL) and Wastewater Guidelines that are now in use by some leading brands. The Apparel and Footwear RSL Management Group (AFIRM) was formed to help companies follow a

[1]Center for Environmental Health (2021). How the Process of Making Plastic is as Harmful as Plastic Waste. https://ceh.org/yourhealth/how-the-process-of-making-plastic-is-as-harmful-as-plastic-waste/
[2]Woodruff, T. J. (2024). Health Effects of Fossil Fuel-Derived Endocrine Disruptors. New England Journal of Medicine, Vol. 390. DOI: 10.1056/NEJMra2300476
[3]Nature Medicine, Vol 30 (2040). Microplastics are everywhere — we need to understand how they affect human health. https://doi.org/10.1038/s41591-024-02968-x
[4]MSN (2024). Fast-Fashion Failure: Toxic Chemicals Found in Shein, Temu shoes https://www.msn.com/en-us/news/world/fast-fashion-failure-toxic-chemicals-found-in-shein-temu-shoes/ar-AA1p2V9U
[5]Greenpeace (2022). Taking the Shine Off SHEIN: Hazardous chemicals in SHEIN products break EU regulations, new report finds.
https://www.greenpeace.org/international/press-release/56979/taking-the-shine-off-shein-hazardous-chemicals-in-shein-products-break-eu-regulations-new-report-finds/
[6]United States Consumer Product Safety Commission (2023). Summary Information for Children's Sleepwear, 16 CFR Parts 1615 & 1616.
https://www.cpsc.gov/s3fs-public/1615-and-1616-Fact-Sheet-Childrens-Sleepwear-English.pdf?VersionId=hQCkaWdU_.OnqlvmFUSsfBx0vCaiL1DX
[7]National Institute of Environmental Health Sciences. Flame Retardants. https://www.niehs.nih.gov/health/topics/agents/flame_retardants
[8]Ecocult (2023). Should You Be Worried About Flame Retardants in Clothing? https://ecocult.com/flame-retardants-clothing-pajamas/
[9]Licina, D., Glenn C. M., Gabriel B., Charles J. W., and William W. N. (2019) Clothing-Mediated Exposures to Chemicals and Particles. Environmental Science & Technology, Vol. 53, no. 10: 5559–75. https://doi.org/10.1021/acs.est.9b00272
[10]Ragnarsdóttir, O., Mohamed A., and Stuart H. (2022) Dermal Uptake: An Important Pathway of Human Exposure to Perfluoroalkyl Substances?. Environmental Pollution, Vol. 307: 119478. https://doi.org/10.1016/j.envpol.2022.119478
[11]Bu, Z., Cong D., Daniel M., Yanghui Y., and Zhu C. (2021) Modeled Exposure to Phthalates via Inhalation and Dermal Pathway in Children's Sleeping Environment: A Preliminary Study and Its Implications. Building Simulation, Vol. 14, no. 6: 1785–94. https://doi.org/10.1007/s12273-021-0769-8
[12]OECD. (2019) Estimating Mouthing Exposure in Children – Compilation of Case Studies. OECD Series on Testing and Assessment, No. 306, OECD Publishing, Paris, https://doi.org/10.1787/debe99f0-en
[13]Oh, J., Hyeong-Moo S., Kurunthachalam K., Stefanie A. B., Rebecca J. S., Julie B. S., Irva H., and Deborah H. B. (2022) Childhood Exposure to Per- and Polyfluoroalkyl Substances and Neurodevelopment in the CHARGE Case-Control Study. Environmental Research, Vol. 215, no. Pt 2: 114322. https://doi.org/10.1016/j.envres.2022.114322
[14]Zhang, J., Lei W., Leonardo T., and Kurunthachalam K. (2021) Occurrence of Polyethylene Terephthalate and Polycarbonate Microplastics in Infant and Adult Feces. Environmental Science & Technology Letters, Vol. 8, no. 11: 989–94. https://doi.org/10.1021/acs.estlett.1c00559
[15]Greenpeace International. Detox My Fashion. https://www.greenpeace.org/international/act/detox/
[16]ZDHC. Welcome to the ZDHC Gateway. https://www.zdhc-gateway.com/

restricted substances list (RSL), as were other consortiums and certification programs. These groups typically bring companies into compliance with regulatory requirements in the countries they operate in. **While the adoption of a third-party RSL or MRSL is a strong step in the right direction, some analyses suggest that current regulatory requirements may not be strong enough to protect our health, especially for children and infants.**[17]

States in the U.S. are now moving to fill the federal regulatory gaps and have implemented several laws that are expected to drive the industry away from PFAS (California, Maine, Minnesota, and New York) and phthalates (Washington and Maine), among other chemicals of concern.[18]

Defend Our Kids Fashion Scorecard addresses concerns not only about potentially toxic chemicals used directly in the making of apparel, but also examines the use of fossil fuel-derived plastics in textiles and packaging because of the inherent potential toxicity of plastics. Over 16,000 chemical substances have been identified for use with plastics as additives, processing aids, and monomers–4,200 of these were found to be substances of concern, while hazard information is lacking for over 10,000 other chemicals.[20] **Polyester — a synthetic fabric made of plastic — is now the most widely produced fiber, accounting for 57% of global fiber production,[21] and has surpassed cotton production due to the advent of fast fashion and high oil and gas production in the U.S.**[22] Some chemicals of concern, such as phthalates and vinyl chloride, are directly associated with plastics. Phthalates, for example, are used to give flexibility to PVC plastic. When we examine the full supply chain of plastics used to make packaging and synthetic fibers, we find further potential harm from chemicals of concern to communities near sites of oil and gas extraction and plastic production.[23]

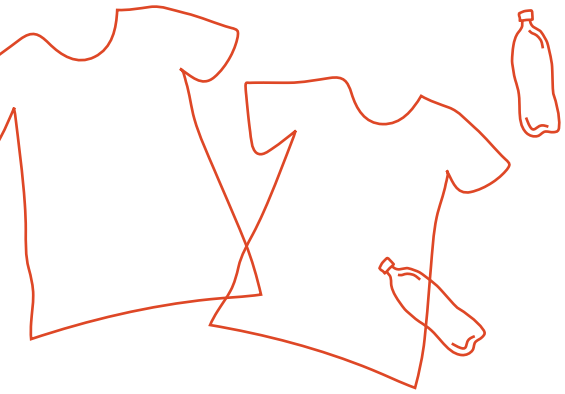
KIDS' SLEEPWEAR: FLAMMABILITY AND POLYESTER USE

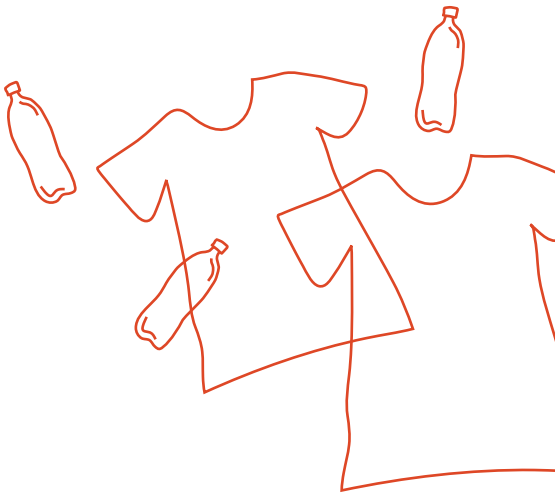
Federal regulation requires all sleepwear made for infants and children to be either flame-resistant or tight-fitting. Tight-fitting sleepwear is less flammable because it is less likely to catch a flame, unlike loose clothing. Because there is less oxygen between the wearer's skin and the material, any contact with a flame is less likely to ignite. To make a loose-fitting sleepwear garment flame-resistant, companies must either make it with flame-resistant material or have been treated with flame retardants.

Many kids' clothing companies choose to market loose-fitting sleepwear made from polyester because it is inherently flame-resistant, while natural fibers like cotton are not. This generates demand for fossil fuel-derived fabric and is one reason children's clothing companies may not move to reduce their use of polyester in sleepwear.[19] While we encourage reducing polyester and other fossil fuel-derived fabrics, we recognize that polyester is preferable to applying flame retardants when tight-fitting sleepwear is not marketable.

[17]Fashion FWD. US Policies Fall Short. https://www.fashionfwd.org/uspolicies
[18]Safer States. Bill Tracker. https://www.saferstates.org/bill-tracker/?status=Adopted&issue_sectors=Children%27s%20Products,Textiles
[19]Wirecutter (2025). What's Up With the Scary Tags on Children's Jammies? https://www.nytimes.com/wirecutter/reviews/flammability-rules-for-childrens-pajamas/
[20]Wagner, M., Monclús, L., Arp, H. P. H., Groh, K. J., Løseth, M. E., Muncke, J., Wang, Z., Wolf, R., & Zimmermann, L. (2024). State of the science on plastic chemicals - Identifying and addressing chemicals and polymers of concern. Zenodo. https://doi.org/10.5281/zenodo.10701706
[21]Textile Exchange (2024). Materials Market Report. https://textileexchange.org/app/uploads/2024/09/Materials-Market-Report-2024.pdf
[22]S&P Global (2019). Shale-fueled US plastics boom puts spotlight on sustainability. https://www.spglobal.com/commodity-insights/en/news-research/blog/chemicals/101619-shale-fueled-us-plastics-boom-puts-spotlight-on-sustainability
[23]Grist (2024). A Louisiana court just revived plans for the country's biggest plastics plant. https://grist.org/regulation/louisiana-court-revived-biggest-plastic-plant-formosa/

CHEMICALS OF CONCERN	COMMON USE IN CLOTHING AND/OR PACKAGING	POTENTIAL HEALTH EFFECTS
PFAS (per- and polyfluoroalkyl substances)	Water and stain repellency	PFAS are highly persistent, bioaccumulative, and linked to developmental, immune, and metabolic harms[24]
phthalates	Used with plastics, like PVC, to impart flexibility, durability, and transparency	There is no known safe level of exposure to phthalates for infants and children. These chemicals are endocrine-disrupting and have been linked to developmental, reproductive, and metabolic harms[25,26]
PVC (polyvinyl chloride)	Used in some screenprints, elastic bands, waterproof coatings, leather, and faux leather items, and widely used in rigid packaging	Vinyl chloride, which PVC can emit, is associated with liver damage and is the highest classification (Class A) carcinogen[27]
Other chemicals that could be associated with recycled plastics	Recycled PET beverage bottles are commonly used to produce polyester clothing. PET beverage bottles often contain antimony and cobalt compounds	Antimony and cobalt forms are possible human carcinogens[28]
Microplastics	Shed from polyester and other synthetic clothing and packaging	Microplastics are widely distributed in human bodies.[29] Research is still in the early stages, but microplastics have begun to be associated with heart disease and stroke,[30] inflammation,[31] obesity,[32] and fertility issues[33]





[24]Rapazzo, K. M., Coffman, E., Hines, E. P. (2017). Exposure to Perfluorinated Alkyl Substances and Health Outcomes in Children: A Systematic Review of Epidemiologic Literature. International Journal of Environmental Research and Public Health, Vol 14, no. 7. https://doi.org/10.3390/ijerph14070691
[25]Engel, S. M., Heather B. P., Charlotte B., Russ H., Ami R. Z., Deborah H. B., Maureen S., and Robin M. W. (2021). Neurotoxicity of Ortho-Phthalates: Recommendations for Critical Policy Reforms to Protect Brain Development in Children. American Journal of Public Health, Vol. 111, no. 4: 687–95. https://doi.org/10.2105/AJPH.2020.306014
[26]Ahn, C., and Eui-Bae J. (2023) Endocrine-Disrupting Chemicals and Disease Endpoints. International Journal of Molecular Sciences, Vol. 24, no. 6: 5342. https://doi.org/10.3390/ijms24065342
[27]U.S. Environmental Protection Agency. (2016). Vinyl chloride: Health effects (EPA 740-R-16-001). U.S. Environmental Protection Agency. https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/vinyl-chloride.pdf
[28]International Agency for Research on Cancer. (2023). IARC Monographs on the identification of carcinogenic hazards to humans: Volume 131, Cobalt, Antimony Compounds, and Weapons-grade Tungsten Alloy. World Health Organization. https://publications.iarc.fr/618
[29]Prata, J., João P. C., Isabel L., Armando C. D., and Teresa R. (2020) Environmental Exposure to Microplastics: An Overview on Possible Human Health Effects. Science of The Total Environment, Vol. 702: 134455. https://www.sciencedirect.com/science/article/abs/pii/S0048969719344468?via%3Dihub
[30]Marfella, R., Francesco P., Celestino S., Gianluca F., Laura G., Tatiana S., Nunzia D., et al. (2024) Microplastics and Nanoplastics in Atheromas and Cardiovascular Events. The New England Journal of Medicine, Vol. 390, no. 10: 900–910. https://doi.org/10.1056/NEJMoa2309822
[31]Kadac-Czapska, K., Justyna O., Eliza K., and Małgorzata G. (2024) Microplastics and Oxidative Stress—Current Problems and Prospects. Antioxidants, Vol. 13, no. 5: 579. https://doi.org/10.3390/antiox13050579
[32]Zhao, J., Ngozi A., Daniel G., Marina M., Daniel J. C., Abigail E., Jianzhu L., et al. (2024) Obesogenic Polystyrene Microplastic Exposures Disrupt the Gut-Liver-Adipose Axis. Toxicological Sciences: An Official Journal of the Society of Toxicology, Vol. 198, no. 2: 210–20. https://doi.org/10.1093/toxsci/kfae013
[33]Zhang, C., Guanghui Z., Kuan S., Jingchao R., Jiaming Z., Xuan L., Fenglong L., et al. (2024) Association of Mixed Exposure to Microplastics with Sperm Dysfunction: A Multi-Site Study in China. EBioMedicine, Vol. 108: 105369. https://doi.org/10.1016/j.ebiom.2024.105369

FINDINGS AND RECOMMENDATIONS

Overall, the ten companies analyzed in this scorecard received an average composite score of 35.3 out of 100 points, or a C grade. The highest score was attained by **H&M**–a B+ with 61.5 points. **Ralph Lauren** is in second place with a B and 56.4 points. The lowest score was for **Janie and Jack**, which obtained 0 points and an F.

Transparency & Commitment Criteria

Publicly Available Information

H&M Group stands out for using a hazard-based assessment of all chemicals in use to identify safer substitutions. Defining and investing in safer substitutions is a crucial step for companies that have eliminated chemicals of concern.

Disclosure of Specific Intentionally Added Chemicals of Concern

None of the companies evaluated discloses the chemical ingredients of its apparel products, although several companies have banned some but not all of the chemicals of concern highlighted (phthalates, PVC, and PFAS), negating an ability to disclose those chemicals. It is not a practice of the fashion industry to label its products with the chemicals used to produce them. Yet, apparel is worn against skin where skin contact may facilitate the uptake of chemicals in clothing.[34] Apparel companies should begin to disclose any intentionally added chemicals of concern that are used in the manufacturing process and may still be present in finished products.

Transparency & Commitments to Reduce Plastic Fibers

Only four companies **(Carter's, H&M Group, Ralph Lauren, and The Children's Place)** publish material mixes to show what portion of their products are made from polyester, cotton, linen, and other materials. If companies choose to reduce reliance on polyester and other fossil fuel-derived fibers, the publication of a material mix allows the public to track their progress. No company here has yet made public a goal to reduce reliance on polyester, however, **Primary** appears to prioritize 100% cotton in its products outside of its active and swimwear lines.

Commitments to Reduce Plastic Packaging

Six companies (**Gap Inc., Gerber Childrenswear, H&M Group, Primary, Ralph Lauren, and The Honest Company**) have made public commitments to reduce the use of plastic packaging and/or to eliminate PVC packaging, but **H&M Group** is the only company to set a public numerical plastics packaging reduction target. Companies should set and publicize targets that are time-bound and tied to a reduction percentage.

Action Criteria

Use of RSLs and MRSLs

Nine companies utilize an RSL to varying degrees. **Janie and Jack** lags behind the other analyzed brands with no public or known use of an RSL. Five companies use an MRSL (**Carter's, Gap Inc., H&M Group, Ralph Lauren, The Children's Place, and The Honest Company**). Utilization of RSLs and MRSLs is a crucial step towards reducing the use of chemicals of concern. Companies should expand their use to encompass 100% of products sold, and companies that have not yet implemented MRSLs should do so. While RSLs and MRSLs are a great first step, they may lag behind research on the health harms of chemicals, and so additional points were awarded for actions taken to go above and beyond existing third-party RSLs.

Elimination or Prohibition of Chemicals of Concern

Eight companies have taken steps to reduce or eliminate one or more chemicals of concern. **Gap Inc.** reports that it has achieved its goal of not sourcing any fabrics intentionally treated with PFAS, and it maintains an internal list of non-PFC-based finishes for water-repellent and weather-resistant performance that it shares with suppliers. **Carter's** has a public policy to not intentionally add PFAS to any of its

[34]Rovira, J., Domingo, J.L. (2019). Human health risks due to exposure to inorganic and organic chemicals from textiles: A review. Environmental Research, Vol. 168. https://doi.org/10.1016/j.envres.2018.09.027

apparel or accessory products. The company states that it conducts total fluorine testing on all products with claims of water or stain resistance. **Ralph Lauren** reportedly bans the intentional use of PFAS, potassium permanganate, and PVC. **The Honest Company** states that it maintains a list of banned ingredients, including phthalates, PFAS, and over 3500 chemicals. **H&M Group** states that it has banned the use of PVC in its textiles. The focus on PFAS may reflect the increasing public attention and resulting regulation of the compounds. Companies should put similar efforts into eliminating the use of any phthalates or PVC in the manufacturing of their products.

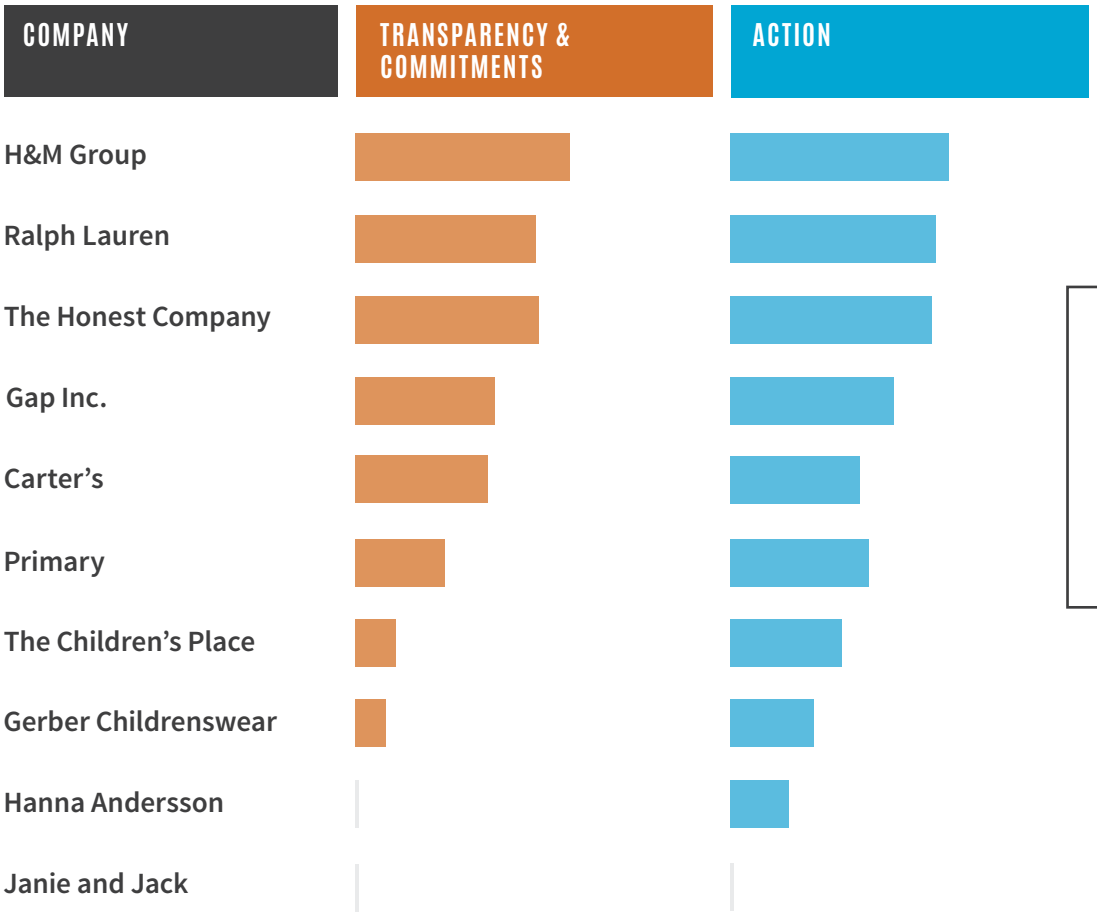
Reduction or Elimination of Plastic Packaging

H&M Group reports that it has reduced its volume of plastic packaging by 54% against a 2018 baseline, exceeding its 2025 target of 25%, and it has banned the use of PVC in its packaging. **Gerber Childrenswear** and **Primary** state that they have eliminated PVC in packaging, and **Ralph Lauren** states that it has begun to work on phasing out PVC in its packaging. Eight companies received some credit for action to reduce plastic packaging and/or eliminate PVC packaging. Still, **Hanna Andersson** and **Janie and Jack** have not disclosed any reductions to that effect nor disclosed that they do not use any plastic packaging as a matter of policy. Companies should eliminate any use of PVC packaging and reduce their overall use of plastic packaging.

Advocacy to Restrict Hazardous Chemicals or Plastics & Investments in Safer Solutions

No company scored points for either public advocacy to restrict hazardous chemicals or plastics or for public investments in safer solutions. By investing in safer solutions, companies can help ensure that regrettable substitutions or losses in product performance will not undermine their efforts to reduce the use of chemicals of concern.

LEADERS & LAGGARDS



Portion of company scores obtained with transparency and commitments criteria (in orange) and action criteria (in blue).

carter's®

Carter's, OshKosh B'Gosh, Little Planet, PurelySoft, Skip Hop

C

RANK #5

Total points: 36.5 out of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: Carter's publishes both an annual sustainability report [35] and a chemicals management program on a stand-alone webpage.[36] It does not appear to disclose a safer substitutions policy or definition. The company should adopt a public safer substitutions policy and a "safer alternative" definition aligned with the state of Washington Department of Ecology's definition.

1.5 out of 3 points

Chemicals disclosure: Carter's does not disclose chemical components of its products through product labeling or other means, but its ban on intentionally added PFAS is an assurance to customers. The company should disclose to customers any intentionally added phthalates or PVC in any quantity and at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: Carter's has a policy to not intentionally add PFAS to any apparel or accessory products.

4 out of 4 points

Reducing fossil fuel-derived fibers: Carter's publishes its material mix in its annual sustainability report but does not have a public target to reduce the overall use of fossil fuel-derived fibers. The company should set a public target to reduce the overall use of fossil fuel-derived fibers.

2 out of 4 points

Reducing plastic packaging: Carter's does not publish a target to reduce potential toxicity and/or use of plastic packaging. The company should set a public target to reduce the overall use of plastic packaging and set a public target to eliminate the use of any plastic packaging containing PVC.

0 out of 4 points

Action

Managing chemicals using RSL: Carter's uses OEKO-TEX Standard 100 Certification for its products. Carter's has stated that by the end of 2023, 98% of its product in scope was certified, and 99% of its manufacturing facilities were certified. Carter's uses a small amount of organic cotton certified by GOTS, but it is under 5%.

9 out of 9 points

Managing chemicals using MRSL: Carter's reports that it is adopting ZDHC's MRSL and has reached 80% compliance among its fabric mills and at least 58% among its laundry facilities (with a goal to reach 80% compliance among laundry facilities by 2025). The company should expand the use of ZDHC's MRSL to encompass a greater portion of its product line.

7 out of 9 points

Further reducing chemicals of concern: Carter's has a policy to not intentionally add PFAS to any apparel or accessories. It conducts total fluorine testing on all products with claims of water or stain resistance but has not publicly taken steps to restrict PVC, phthalates, or other chemicals of concern beyond the minimums set in its RSL and MRSL. The company should eliminate the use of any phthalates and PVC in its products.

6.5 out of 25 points

Reducing plastics use: Carter's has replaced plastic shopping bags in Canada with paper bags and plastic packaging with paper in some Skip Hop Moby Bath Bundles. Based on publicly available information and communication with the company, Carter's has not decreased the weight of plastic packaging, phased out any use of PVC in packaging, or reduced the percentage of fossil fuel-derived synthetics in its fiber mix in the last two years. The company should continue to reduce the overall use of plastic packaging, take action to eliminate the use of any plastic packaging that contains PVC, and reduce the percentage of fossil fuel-derived synthetics in its fiber mix.

6.5 out of 25 points

[35]Carter's (2023). 2023 Raise the Future Impact Report. https://www.carters.com/on/demandware.static/-/Sites-Carters-Library/default/vf7f4e298c7553ed307447d13f13e7be0fca94bce/PDF/carters/Carters_CSR_May_17_10a.pdf?version=1,715,187,749,393
[36]Carter's. Chemicals Management. https://esg.carters.com/2022-chemicals-management

carter's®

Carter's, OshKosh B'Gosh, Little Planet, PurelySoft, Skip Hop

C

RANK #5

Total points: 36.5 out of 100

Advocating to restrict hazardous chemicals and plastics: Based on available public information and communication with the company, Carter's has not supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Carter's has developed the Little Planet product line, which appears to test and scale safer materials. However, the company has not publicized the dollar amount invested in its development of the product line.

0 out of 10 points

GAP

Athleta, Banana Republic, GAP, Old Navy

C+

RANK #4

Total points: 44.25 out of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: Gap Inc. publishes both an annual ESG report,[37] and a chemicals management program on a stand-alone webpage.[38] It does not disclose a safer substitutions policy. Still, it does maintain an internal list of non-PFC-based finishes for water-repellent and weather-resistant performance that it shares with suppliers (awarded partial credit). The company should adopt a formal safer substitutions policy and a "safer alternative" definition aligned with the state of Washington Department of Ecology's definition.

2 out of 3 points

Chemicals disclosure: Gap Inc. does not disclose chemical components of its products through product labeling or other means, but its ban on intentionally added PFAS is an assurance to customers. The company should disclose to customers any intentionally added phthalates or PVC in any quantity at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: According to the company, Gap Inc. has a goal (since achieved) to not source any fabrics intentionally treated with PFAS. The company also states that it has begun to address its use of dimethylformamide (DMF) in synthetic leather by seeking alternatives through mill audits and training. Gap Inc. reports that it has also engaged suppliers on using potassium permanganate (PP), which is used in denim bleaching, with technical training on safer alternatives and engineering controls when PP is used.

4 out of 4 points

Reducing fossil fuel-derived fibers: Gap Inc. does not disclose its material mix and does not have a public target to reduce the use of fossil fuel-derived fibers. The company should make its annual material mix public and set a public target to reduce the overall use of fossil fuel-derived fibers.

0 out of 4 points

Reducing plastic packaging: Gap Inc. is a member of the Fashion Pact and adheres to the Pact's 2025 goal to eliminate unnecessary or problematic plastics in consumer packaging and the Pact's 2030 goal for business to business packaging. As part of this process, Gap Inc. reportedly has a goal to eliminate and substitute plastic packaging with non-plastic alternatives. It does not publish a target to reduce the weight of plastic packaging or to reduce or phase out any PVC in plastic packaging. The company should set a public target to eliminate the use of any plastic packaging that contains PVC.

1.75 out of 4 points

Action

Managing chemicals using RSL: All Gap Inc. suppliers are reportedly expected to adhere to the AFRIM RSL.

9 out of 9 points

Managing chemicals using MRSL: All Gap Inc. suppliers are reportedly expected to follow the ZDHC MRSL and the ZDHC Wastewater Guidelines.

9 out of 9 points

Further reducing chemicals of concern: Gap Inc. reports that it has met its goal to not source any fabrics intentionally treated with PFAS and has begun restrictions on dimethylformamide and potassium permanganate. Gap Inc. does not publicly restrict PVC or phthalates beyond the minimums set in its RSL and MRSL. The company should eliminate the use of any phthalates or PVC in its products.

12 out of 25 points

[37]Gap Inc. (2023). 2023 ESG Report. https://gapinc-prod-a6bndyfubmc5d9ey.z03.azurefd.net/gapmedia/gapcorporatesite/media/images/values/sustainability/esg-resources/2023-gap-inc-esg-report.pdf
[38]Gap Inc. Chemicals Management. https://www.gapinc.com/en-us/impact/bridging-the-climate-gap/chemicals-management

GAP

Athleta, Banana Republic, GAP, Old Navy

C+

RANK #4

Total points: 44.25 out of 100

Reducing plastics use: As of 2023, Gap Inc. reports that it has eliminated 47% of unnecessary or problematic packaging for consumers and replaced it with non-plastic alternatives. It does not appear to have decreased the weight of plastic packaging or phased out the use of any PVC in plastic packaging. It is unknown if Gap Inc. has reduced the percentage of fossil fuel-derived synthetics in its fiber mix within the last two years. The company should eliminate the use of any plastic packaging that contains PVC.

6.5 out of 25 points

Advocating to restrict hazardous chemicals and plastics: Based on available public information, it is unclear whether Gap Inc. has supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Based on available public information, it is unclear whether Gap Inc. has invested in safer solutions to chemicals of concern in the last 6 years. The company should publicly support developing, verifying, and implementing safer solutions with a direct financial contribution.

0 out of 10 points

Gerber® Childrenswear

D

RANK #8

Total points: 21.25 out of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: Gerber Childrenswear does not publish a sustainability report, disclose a formal chemicals policy, or disclose a safer substitutions policy or definition. The company should publicly disclose a formal chemicals policy and adopt a public safer substitutions policy.

0 out of 3 points

Chemicals disclosure: Gerber Childrenswear does not appear to disclose chemical components of its products through labeling or other means. The company should disclose any intentionally added PFAS, phthalates, or PVC in any quantity at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: Gerber Childrenswear does not have a public target to reduce or eliminate one or more chemicals of concern in apparel or apparel manufacturing. The company should set a public target to eliminate any use of PFAS, phthalates, and PVC.

0 out of 4 points

Reducing fossil fuel-derived fibers: Gerber Childrenswear does not appear to disclose its material mix and does not have a public target to reduce its use of fossil fuel-derived fibers. The company should make its annual material mix public and set a target to reduce the overall use of fossil fuel-derived fibers.

0 out of 4 points

Reducing plastic packaging: Gerber Childrenswear has a target to phase out PVC in plastic packaging by 2025.[39] The company should set a public target to reduce the overall use of plastic packaging.

1.75 out of 4 points

Action

Managing chemicals using RSL: Gerber Childrenswear utilizes OEKO-TEX certification for some portion of its products. The company should expand its use of OEKO-TEX certification to all its products.

6.5 out of 9 points

Managing chemicals using MRSL: Gerber Childrenswear does not provide public evidence of participation in a third-party MRSL or its own MRSL. The company should implement an MRSL or, if it currently does, make that use publicly accessible to customers.

0 out of 9 points

Further reducing chemicals of concern: Gerber Childrenswear has not disclosed any reductions in chemicals of concern in apparel or apparel manufacturing. However, using OEKO-TEX certification ensures the company is taking additional steps to restrict the intentional use of PFAS in products.

6.5 out of 25 points

Reducing plastics use: Gerber Childrenswear reports that it has completed a target to phase out PVC in plastic packaging by 2025. The company should reduce the overall use of plastic packaging and the percentage of fossil fuel-derived synthetics in its fiber mix.

6.5 out of 25 points

Advocating to restrict hazardous chemicals and plastics: Based on available public information, it is unclear whether Gerber Childrenswear has supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Based on available public information, it is unclear whether Gerber Childrenswear has invested in safer solutions to chemicals of concern in the last 6 years. The company should publicly support developing, verifying, and implementing safer solutions with a direct financial contribution.

0 out of 10 points

[39]Gerber Childrenswear. Gerber Childrenswear's Journey to Sustainability. https://www.gerberchildrenswear.com/pages/sustainability

H&M Group

B+

RANK #1

Total points: 61.5 out of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: H&M Group publishes an annual sustainability report,[40] discloses a formal chemicals policy broken down by product category,[41] and uses a hazard-based assessment of all chemicals in use to identify safer substitutions.[42] H&M Group does not disclose a safer substitutions definition. The company should adopt a public "safer alternative" definition aligned with the state of Washington Department of Ecology's definition.

2.5 out of 3 points

Chemicals disclosure: H&M Group does not appear to disclose chemical components of its products through labeling or other means, but its ban on intentionally added PFAS and PVC is an assurance to customers. The company should disclose any intentionally added phthalates in any quantity at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: H&M Group reports that the company proactively eliminates the use of hazardous chemicals, including PFAS, dimethylformamide, and PVC, among others.[43]

4 out of 4 points

Reducing fossil fuel-derived fibers: H&M Group discloses its material mix in its sustainability report but does not have a public target to reduce the use of fossil fuel-derived fibers. The company should set a public target to reduce overall use of fossil fuel-derived fibers.

2 out of 4 points

Reducing plastic packaging: H&M Group has a target to reduce plastic packaging volume by 25% in 2025, against a 2018 baseline. It has banned the use of PVC in packaging.[44]

3.5 out of 4 points

[40]H&M Group (2025). H&M Group Annual Sustainability Report 2024. https://hmgroup.com/wp-content/uploads/2025/03/HM-Group-Annual-and-sustainability-report-2024.pdf
[41]H&M Group. Chemical Restrictions. https://hmgroup.com/sustainability/circularity-and-climate/chemicals/chemical-restrictions/
[42]H&M Group (2023). H&M Group's Approach to Hazard Assessment. https://hmgroup.com/wp-content/uploads/2023/01/HM-Groups-approach-to-hazard-assessment-Jan-2023.pdf
[43]H&M Group (2024). H&M Group Sustainability Progress Report 2024. https://hmgroup.com/wp-content/uploads/2025/03/HM-Group-Sustainability-progress-report-2024.pdf
[44]H&M Group. H&M Group Chemical Restrictions 2025. https://hmgroup.com/wp-content/uploads/2025/01/HM-Group-chemical-restrictions-non-consumer-goods-construction-and-packaging-2025.pdf

Action

Managing chemicals using RSL: H&M Group reportedly adheres to the AFIRM RSL.

9 out of 9 points

Managing chemicals using MRSL: H&M Group reportedly maintains an MRSL that restricts chemicals of concern.

9 out of 9 points

Further reducing chemicals of concern: H&M Group states that it has banned the use of PVC in its textiles and has banned the use of PFCs in its products since 2013. It uses a total fluorine test for PFCs.[45] H&M Group has also banned the use of potassium permanganate, styrene-based polymers, dimethylformamide, and possibly other chemicals of concern. The company should eliminate any use of all phthalates in its products.

18.5 out of 25 points

Reducing plastics use: According to the company, H&M Group has reduced its volume of plastic packaging by 54% against a 2018 baseline, exceeding a 2025 target of 25%. H&M Group also states that it has banned the use of PVC in packaging. The company should take action to reduce the overall use of fossil fuel -derived fibers.

13 out of 25 points

Advocating to restrict hazardous chemicals and plastics: Based on available public information and communication with the company, H&M Group has not supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Based on available public information, and communication with the company, H&M Group has not invested in safer solutions to chemicals of concern in the last 6 years. The company should publicly support developing, verifying, and implementing safer solutions with a direct financial contribution.

0 out of 10 points

[45]H&M Group (2017). Case Study Phase Out of Perfluorinated Compounds (PFCs). https://hmgroup.com/wp-content/uploads/2020/10/HM_Case-Study-Phase-out-PFC.pdf

Hanna Andersson

D-

RANK #9

Total points: 13 out of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: Hanna Andersson does not appear to publish a sustainability report, disclose a formal chemicals policy, or disclose a safer substitutions policy or definition. The company should publicly disclose a formal chemicals policy and adopt a safer substitutions policy.

0 out of 3 points

Chemicals disclosure: Hanna Andersson does not appear to disclose chemical components of its products through labeling or other means. The company should disclose any intentionally added PFAS, phthalates, or PVC in any quantity at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: Hanna Andersson does not have a public target to reduce or eliminate one or more chemicals of concern in apparel or apparel manufacturing. The company should set a public target to eliminate the use of phthalates and PVC.

0 out of 4 points

Reducing fossil fuel-derived fibers: Hanna Andersson does not disclose its material mix and does not have a public target to reduce the use of fossil fuel-derived fibers. The company should make its annual material mix public and set a public target to reduce the overall use of fossil fuel-derived fibers.

0 out of 4 points

Reducing plastic packaging: Hanna Andersson does not publish a target to reduce the potential toxicity of and/or use of plastic packaging. The company should set a public target to reduce the overall use of plastic packaging and set a public target to eliminate the use of plastic packaging containing PVC.

0 out of 4 points

Action

Managing chemicals using RSL: Some Hanna Andersson products are OEKO-TEX certified and GOTS certified.[46,47]

6.5 out of 9 points

Managing chemicals using MRSL: Hanna Andersson does not provide public evidence of participation in a third-party MRSL or its own MRSL. The company should implement an MRSL.

0 out of 9 points

Further reducing chemicals of concern: Hanna Andersson has not disclosed any additional reductions in chemicals of concern. However, using OEKO-TEX certification ensures that the company is taking additional steps to restrict the intentional use of PFAS in its products.

6.5 out of 25 points

Reducing plastics use: Hanna Andersson has not disclosed any reductions in plastics used in packaging and fibers. The company should reduce the overall use of plastic packaging, eliminate the use of any plastic packaging containing PVC, and reduce the percentage of fossil fuel-derived synthetics in its fiber mix.

0 out of 25 points

Advocating to restrict hazardous chemicals and plastics: Based on available public information, it is unclear whether Hanna Andersson has supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Based on available public information, it is unclear whether Hanna Andersson has invested in safer solutions to chemicals of concern in the last 6 years. The company should publicly support developing, verifying, and implementing safer solutions with a direct financial contribution.

0 out of 10 points

[46]Hanna Andersson. Sustainability. https://www.hannaandersson.com/sustainability.html
[47]Hanna Andersson. FAQ. https://www.hannaandersson.com/faqs.html

JANIE AND JACK

F

RANK #10

Total points: 0 out of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: Janie and Jack provides vague information on its website regarding chemicals management, stating, "Janie and Jack encourages vendors to reduce waste, use recycled and non-toxic materials whenever possible and to improve energy and water efficiency."[48] It does not publish a sustainability report, disclose a formal chemicals policy, or disclose a safer substitutions policy or definition. The company should publicly disclose a formal chemicals policy and adopt a safer substitutions policy.

0 out of 3 points

Chemicals disclosure: Janie and Jack does not appear to disclose chemical components of its products through labeling or other means. The company should disclose to customers any intentionally added PFAS, phthalates, and PVC in any quantity at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: Janie and Jack does not have a public target to reduce or eliminate one or more chemicals of concern in apparel or apparel manufacturing. The company should set a public target to eliminate the use of PFAS, phthalates, and PVC.

0 out of 4 points

Reducing fossil fuel-derived fibers: Janie and Jack does not disclose its material mix and does not have a public target to reduce the use of fossil fuel-derived fibers. The company should make its annual material mix public and set a public target to reduce the overall use of fossil fuel-derived fibers.

0 out of 4 points

Reducing plastic packaging: Janie and Jack does not publish a target to reduce the potential toxicity of and/or use of plastic packaging. The company should set a public target to reduce the overall use of plastic packaging and set a public target to eliminate the use of any plastic packaging containing PVC.

0 out of 4 points

Action

Managing chemicals using RSL: Based on available public information, Janie and Jack apparently does not participate in a third-party certification or RSL, nor does it have its own RSL. The company should implement an RSL.

0 out of 9 points

Managing chemicals using MRSL: Janie and Jack does not provide public evidence of participation in a third-party MRSL or its own MRSL. The company should implement an MRSL.

0 out of 9 points

Further reducing chemicals of concern: Janie and Jack has not disclosed any reductions in chemicals of concern in apparel or apparel manufacturing. The company should eliminate the use of any PFAS, phthalates, or PVC in its products.

0 out of 25 points

Reducing plastics use: Janie and Jack has not disclosed any reductions in plastics used in packaging and fibers. The company should reduce the overall use of plastic packaging, take action to eliminate the use of any plastic packaging containing PVC, and reduce the percentage of fossil fuel-derived synthetics in its fiber mix.

0 out of 25 points

Advocating to restrict hazardous chemicals and plastics: Based on available public information, it is unclear whether Janie and Jack has supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Based on available public information, it is unclear whether Janie and Jack has invested in safer solutions to chemicals of concern in the last six years. The company should publicly support developing, verifying, and implementing safer solutions with a direct financial contribution.

0 out of 10 points

[48]Janie and Jack. Social Responsibility. https://www.janieandjack.com/social-responsibility.html?lang=en_US

PRIMARY

C

RANK #6

Total points: 35.5 out of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: Primary does not publish a sustainability report, disclose a formal chemicals policy, or disclose a safer substitutions policy or definition. The company should disclose a formal chemicals policy and adopt a public safer substitutions policy.

0 out of 3 points

Chemicals disclosure: Primary does not disclose chemical components of its products through labeling or other means. The company should disclose to customers any intentionally added phthalates, PVC, and PFAS in any quantity at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: Primary does not have a public target to reduce or eliminate one or more chemicals of concern in apparel or in apparel manufacturing. The company should set a public target to eliminate any use of PFAS, phthalates, and PVC.

0 out of 4 points

Reducing fossil fuel-derived fibers: Primary does not disclose its material mix and does not have a public target to reduce the use of fossil fuel-derived fibers, however it does appear to use 100% cotton in most or all of its apparel outside of its active and swimwear lines (partial credit). The company should make its annual material mix public.

1 out of 4 points

Reducing plastic packaging: Primary has a goal to transition to "sustainable, plastic-free packaging."[49]

4 out of 4 points

Action

Managing chemicals using RSL: All of Primary's organic 100% cotton products are certified by GOTS and the company claims that all materials used in its products must comply with its own RSL.[50]

9 out of 9 points

Managing chemicals using MRSL: Primary does not provide public evidence of participation in a third-party MRSL or its own MRSL. The company should implement an MRSL.

0 of 9 points

Further reducing chemicals of concern: Primary has not disclosed any additional reductions in chemicals of concern, however, using GOTS certification ensures that the company is taking additional steps to restrict the intentional use of PFAS in its products. The company should eliminate the use of any phthalates and PVC in its products.

6.5 out of 25 points

Reducing plastics use: Primary reports it has reduced its use of plastic packaging by discontinuing the use of polybags, and it reports it is committed to not using PVC packaging. The company appears to use 100% cotton in most or all of its apparel outside of its active and swimwear lines (partial credit).

15 out of 25 points

Advocating to restrict hazardous chemicals and plastics: Based on available public information, it is unclear whether Primary has supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Based on available public information, it is unclear whether Primary has invested in safer solutions to chemicals of concern in the last 6 years. The company should publicly support developing, verifying, and implementing safer solutions with a direct financial contribution.

0 out of 10 points

[49]Primary (2024). Primary's Sustainability Initiative. https://www.primary.com/blogs/using-our-words/primarys-sustainability-initiative?ref=footer_15
[50]Primary (2024). FAQ. https://www.primary.com/pages/help

RALPH LAUREN

B

RANK #2

Total points: 56.375 out of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: Ralph Lauren publishes an annual sustainability report [51] and has a formal chemicals policy.[52] It does not disclose a safer substitutions policy or definition. The company should publicly adopt a formal safer substitutions policy and a "safer alternative" definition aligned with the state of Washington Department of Ecology's definition.

1.5 out of 3 points

Chemicals disclosure: Ralph Lauren does not appear to disclose chemical components of its products through labeling or other means, but its ban on intentionally added PFAS and PVC is an assurance to customers. The company should disclose any intentionally added phthalates in any quantity at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: Ralph Lauren reports that it has a goal to eliminate the use of hazardous chemicals in manufacturing by 2025, and is working to eliminate the use of PFAS, potassium permanganate, and PVC.

4 out of 4 points

Reducing fossil fuel-derived fibers: Ralph Lauren discloses its material mix but does not have a public target to reduce the overall use of fossil fuel-derived fibers. The company should set a public target to reduce the overall use of fossil fuel-derived fibers.

2 out of 4 points

Reducing plastic packaging: Ralph Lauren is piloting paper-based alternatives to polybags used in its North American Polo Retail Outlets and e-commerce but does not have a formal reduction target. It is also a member of the Fashion Pact, which has a 2025 goal to eliminate unnecessary or problematic plastics in consumer packaging, and a 2030 goal for business to businesses packaging (awarded partial credit).[53] It has a target to phase out PVC in its packaging. The company should develop a formal public target to reduce reliance on plastic packaging.

2.625 out of 4 points

Action

Managing chemicals using RSL: Ralph Lauren reportedly adheres to the AAFA RSL.

9 out of 9 points

Managing chemicals using MRSL: Ralph Lauren reportedly utilizes ZDHC's MRSL.

9 out of 9 points

Further reducing chemicals of concern: Ralph Lauren bans the intentional use of PFAS, potassium permanganate, and PVC, but does not restrict the use of phthalates beyond the minimums set in its RSL and MRSL. The company should eliminate any use of phthalates in its products.

18.5 out of 25 points

Reducing plastics use: Ralph Lauren is piloting paper-based alternatives to polybags used in its North American Polo Retail Outlets and e-commerce and has begun work to phase out PVC in packaging (awarded partial credit for PVC progress). The company should also reduce the percentage of fossil fuel-derived synthetics in its fiber mix.

9.75 out of 25 points

Advocating to restrict hazardous chemicals and plastics: Based on available public information, it is unclear whether Ralph Lauren has supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Based on available public information, it is unclear whether Ralph Lauren has invested in safer solutions to chemicals of concern in the last 6 years. The company should publicly support developing, verifying, and implementing safer solutions with a direct financial contribution.

0 out of 10 points

[51]Ralph Lauren (2024). 2024 Global Citizenship & Sustainability Report and GC&S Supplement. https://corporate.ralphlauren.com/citizenship-and-sustainability
[52]Ralph Lauren. Sustainable Chemical Management Policy. https://corporate.ralphlauren.com/on/demandware.static/-/Sites-RalphLauren_Corporate-Library/default/dwce032b11/documents/2023_reports_and_policies/RL-SustainableChemicalMGMT.pdf
[53]Fashion Pact (2022). A Guide to Inform Packaging Choices in the Fashion Industry. https://www.thefashionpact.org/wp-content/uploads/2024/03/the-fashion-pact-packaging-guide.pdf

THE CHILDREN'S PLACE

The Children's Place, Gymboree

C

RANK #7

Total points: 28.5 of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: The Children's Place publishes an annual sustainability report[54] but does not disclose a formal chemicals policy or disclose a safer substitutions policy or definition. The company should disclose a formal chemicals policy and adopt a public safer substitutions policy.

0.5 out of 3 points

Chemicals disclosure: The Children's Place does not appear to disclose chemical components of its products through labeling or other means. The company should disclose any intentionally added PFAS, phthalates, and PVC in any quantity at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: The Children's Place does not have a public target to reduce or eliminate one or more chemicals of concern in apparel or apparel manufacturing. The company should set a public target to eliminate any use of PFAS, phthalates, and PVC.

0 out of 4 points

Reducing fossil fuel-derived fibers: The Children's Place disclosed its material mix in its 2022 sustainability report,[55] but does not have a public target to reduce its overall use of fossil-fuel derived fibers. The company should set a public target to reduce the overall use of fossil fuel-derived fibers.

2 out of 4 points

Reducing plastic packaging: The Children's Place does not publish a target to reduce potential toxicity and/or use of plastic packaging. The company should set a public target to reduce the overall use of plastic packaging and set a public target to eliminate the use of any plastic packaging containing PVC.

0 out of 4 points

Action

Managing chemicals using RSL: The Children's Place appears to report that it adheres to the AFIRM RSL for its products and uses OEKO-TEX certification for at least 80% of select products. The company should expand its OEKO-TEX certification to a greater percentage of products.

6 out of 9 points

Managing chemicals using MRSL: The Children's Place's in-scope vendors utilize ZDHC's MRSL. To the extant the policy does not cover all products, the company should expand its use of ZDHC's MRSL to encompass a greater percentage of products.

7 out of 9 points

Further reducing chemicals of concern: The Children's Place has not disclosed any additional reductions in chemicals of concern. However, using OEKO-TEX certification ensures the company is taking additional steps to restrict intentional use of PFAS in its products.

6.5 out of 25 points

Reducing plastics use: The Children's Place has reduced material usage in the poly bag, and the plastic hanger in its underwear packaging. The company should take action to eliminate the use of any plastic packaging containing PVC and reduce the percentage of fossil fuel-derived synthetics in its fiber mix.

6.5 out of 25 points

Advocating to restrict hazardous chemicals and plastics: Based on publicly available information, it is unclear whether The Children's Place has supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Based on publicly available information, it is unclear whether The Children's Place has invested in safer solutions to chemicals of concern in the last 6 years. The company should publicly support developing, verifying, and implementing safer solutions with a direct financial contribution.

0 out of 10 points

[54]The Children's Place (2023). 2023 Sustainability & Social Impact Update. https://corporate.childrensplace.com/static/TCP_SUS_IMPACT_2023-5d3f50b1f96c8ef071586695a889e39d.pdf
[55]The Children's Place (2023). The Children's Place 2022 ESG Report. https://corporate.childrensplace.com/static/TCP-2022-ESG-Report-Final-85d3db4e7e0d6e97bdfd2425839573c5.pdf

HONEST®

The Honest Company, Honest Baby

B

RANK #3

Total points: 56.125 out of 100

KEY FINDINGS & RECOMMENDATIONS

Transparency & Commitment

Publicly available information: The Honest Company published an ESG tear sheet for investors[56] in 2021 but has not published a more recent report (awarded partial credit). The company has stated that it "avoids ingredients and ingredient classes of concern, such as parabens, formaldehyde donors, isothiazolinones, butylated hydroxyanisole (BHA), and butylated hydroxytoluene (BHT). We do not use triclocarban/triclosan or nanosilver for any purposes." It is a member of the Green Chemistry and Commerce Council. It reports that it is working closely to identify safe alternatives and incorporate more green chemistry principles in its product formulations (awarded partial credit). It does not include a definition of safer substitutions. The company should adopt a formal safer substitutions policy and a "safer alternative " definition aligned with the state of Washington Department of Ecology's definition.

1.75 out of 3 points

Chemicals disclosure: The Honest Company does not appear to disclose chemical components of its apparel products through labeling or other means, but its ban on intentionally added PFAS and phthalates is an assurance to customers. The company should disclose any intentionally added PVC in any quantity at any stage in the manufacturing process.

0 out of 5 points

Reducing chemicals of concern: The Honest Company reports that it avoids ingredients and ingredient classes of concern.

4 out of 4 points

Reducing fossil fuel-derived fibers: The Honest Company does not publicly disclose its material mix and does not have a public target to reduce its overall use of fossil fuel-derived fibers. However, it appears to use 100% cotton exclusively.

2 out of 4 points

Reducing plastic packaging: The Honest Company has not published a specific target to reduce plastic packaging, but its research and development strategy for packaging considers ways to "reduce plastic use and utilizing PCR or recycled plastic" (awarded partial credit). It has a policy to not use PVC packaging.[57] The company should set a public target to reduce the overall use of plastic packaging.

2.625 out of 4 points

Action

Managing chemicals using RSL: The Honest Company uses organic cotton certified by GOTS for 100% of its product.[58] It also reportedly maintains a "NO List" of over 3500 ingredients that are banned from its products.

9 out of 9 points

Managing chemicals using MRSL: The Honest Company reports that it maintains a "NO List" of over 3500 ingredients that are banned from its products, and its products do not contain any chemicals on Washington State's List of Chemicals of High Concern to Children. However, whether these restrictions extend to manufacturers is unclear (awarded partial credit). The company should implement an MRSL.

4.5 out of 9 points

Further reducing chemicals of concern: The Honest Company reportedly maintains a list of banned ingredients that includes phthalates, PFAS, and over 3500 chemicals, and claims its clothing line is "free of harmful dyes."[59] The company should take additional steps to restrict any intentional use of PVC in its products, if it has not already.

18.5 out of 25 points

[56]The Honest Company. 2021 Environmental, Social & Governance Investor Tear Sheet. https://investors.honest.com/static-files/0262bb2e-d39c-4c2e-949d-efdffba3cfc8
[57]The Honest Company. Honest Standard Page Four, Packaging. https://www.honest.com/honest-standard/page-four
[58]The Honest Company. Our Story. https://honestbabyclothing.com/pages/our-story
[59]The Honest Company (2024). Investor Strategic Update 2024. https://investors.honest.com/static-files/ebcc2a6e-ff52-4061-8b04-2693ec61786d

HONEST®

The Honest Company, Honest Baby

B

RANK #3

Total points: 56.125 out of 100

Reducing plastics use: The Honest Company claims to have reduced plastic packaging in skin and personal care products, but it is unknown how much and whether plastics have also been reduced in apparel packaging (awarded partial credit).[60] The Honest Company has a policy not to use PVC packaging and appears to use only cotton in its apparel. The company should reduce the overall use of plastic packaging in its apparel line, if it's not already doing so.

13.75 out of 25 points

Advocating to restrict hazardous chemicals and plastics: Based on publicly available information, it is unclear whether The Honest Company has supported any laws or regulations to reduce chemicals of concern or petrochemical plastics in the last two years.

0 out of 2 points

Investments in safer solutions: Based on publicly available information, it is unclear whether The Honest Company has invested in safer solutions to chemicals of concern in the last 6 years. The company should publicly support developing, verifying, and implementing safer solutions with a direct financial contribution.

0 out of 10 points

[60]The Honest Company. Industries. https://investors.honest.com/esg/Industries

SCORING CRITERIA

Companies were scored in two primary areas and eleven total criteria. Five "Transparency and Commitment" criteria account for 20% of the total score, and six "Action" criteria account for 80%, reflecting the importance of meaningful action to reduce chemicals of concern and plastics.

Transparency is a critical first step for companies to take when making commitments and taking action. Transparency actions can include a sustainability report, information on a webpage or press release, and formal and public policies available to the public. Transparency allows the public a window into what companies are doing, and without it, companies may take meaningful steps that customers will not know about. Customers seeking more sustainable products need to look into company practices to make informed purchasing decisions.

Commitments are often a step towards action. Clear and achievable commitments help guide action steps and associated timelines by companies. Commitments without meaningful and timely action, however, can quickly become greenwashing.

Action is the steps a company takes to clean up its supply chain and product. Actions scored in this scorecard range from using restricted substances lists (RSL) to ban or limit the amount of chemicals of concern used in product manufacturing, to reductions in the use of certain types of plastics and financial investments in safer solutions.

Where criteria contain sub-criteria, the points allotted for that criteria are a sum of the points given for each sub-criteria.

Transparency & Commitment Criteria

- **Publicly available information about the company's approach to chemicals management**
    - a. Publication of an annual sustainability report
    - b. Disclosure of a formal chemicals policy: a stand-alone document independent of sustainability reports that described the company's approach to chemicals management
    - c. Disclosure of a safer substitutions policy
    - d. Adoption of a definition of "safer alternative" that aligns with the state of Washington Department of Ecology's definition[61] (the only regulatory definition of "safer alternative" in the U.S.)

- **Disclosure to customers through product labeling or other means of any intentionally added phthalates, PVC, and PFAS in any quantity (> 0 ppm) to products at any stage in the manufacturing process. Companies that have achieved 0 ppm of intentionally-added phthalates, PVC, and PFAS will also be awarded full points in lieu of disclosure (no partial credit)**

- **Publication of a target to reduce or eliminate one or more chemicals of concern in apparel or in apparel manufacturing, above and beyond any RSL or MRSL in use**

- **Transparency and targets to reduce fossil fuel-derived fibers**
    - a. Disclosure of material mix (at minimum once in the previous two years)
    - b. Publication of a target to reduce overall use of fossil fuel-derived fibers in product lines

- **Publication of targets to reduce the use of plastic packaging**
    - a. Publication of a target to reduce the weight of individual plastic packaging ("lightweighting") as a means to reduce the overall use of plastics
    - b. Publication of a target to reduce the overall amount of plastic packaging used (no credit given for the use of recycled content without an overall plastic reduction)
    - c. Publication of a target to reduce or phase out PVC in plastic packaging

[61] Washington State Legislature (2024). Revised Code of Washington 70A.350.010. https://app.leg.wa.gov/RCW/default.aspx?cite=70A.350.010&pdf=true

Action Criteria

• Chemicals management: utilization of a restricted substances list (RSL)

a. Public participation in GreenScreen Certified, Chemical Footprint Project, Cradle2Cradle, OEKO-TEX Standard 100, AAFA RSL, AFRIM RSL, GOTS, or the company's own public RSL
b. Maximum credit is given for disclosure that more than 95% of products are certified by the company's own RSL or third-party certification

• Chemicals management: utilization of a manufacturers' restricted substances list (MRSL)

a. Public participation in a third-party manufacturer's restricted substances list (such as ZDHC MRSL)
b. Maximum credit is given for disclosure that more than 95% of products are certified by the company's own MRSL or third-party certification

• Publicly disclosed reductions in chemicals of concern in apparel or apparel manufacturing above and beyond RSL/MRSL

a. Additional steps taken to globally restrict intentionally added PVC in finished products (0 ppm), above and beyond any RSL or MRSL in use
b. Additional steps taken to globally restrict intentionally added phthalates in finished products (0 ppm), above and beyond any RSL or MRSL in use
c. Additional steps taken to globally restrict intentionally added PFAS in finished products (0 ppm), above and beyond any RSL or MRSL in use (except participation in OEKO-TEX or GOTS, which meet this criterion)
d. Additional steps taken to globally restrict one or more other chemicals of concern in finished products

• Publicly disclosed reductions in plastics used in packaging and fibers

a. The company has made reductions in the weight of individual plastic packaging within the last two years
b. The company has reduced the overall use of plastics in packaging within the last two years
c. The company has phased out the use of packaging that contains PVC
d. The company has reduced the percentage of fossil fuel-derived synthetics in fiber mix within the last two years
e. The company has a policy not to use any fossil fuel-derived synthetic fibers

• Advocacy for restricting hazardous chemicals and plastics: the company has publicly supported laws or regulations to restrict hazardous chemicals and/or plastics (with lobbying, testimony, or letters in the last two years)

• Investments in safer solutions to chemicals of concern: the company has invested over the past six years (since May 2019), on its own or through its foundation, in the development, verification, and implementation of safer solutions. The dollar amount invested and results of this investment are made available on a shared or public platform.

Investments may include:

a. Sponsoring or co-sponsoring credible hazard assessments (using GreenScreen or ChemFORWARD) for alternatives to chemicals of concern or plastics of concern in products, packaging, or operations
b. Independent research into safer alternatives to chemicals of concern
c. Funding for material/product development for safer solutions at bench-scale, pilot, or commercialization phases

METHODOLOGY

This scorecard was produced using only publicly available information that was published or provided by the companies themselves. The number of companies selected for inclusion was restricted to ten to minimize the scope of work, with the intention that this first iteration of the Defend Our Kids Fashion Scorecard will serve as a model for an annual project that will ultimately include a larger number of companies. We restricted companies included to those that either exclusively, or nearly exclusively, sell apparel made for babies and/or children (and have an annual revenue over twenty million dollars) or are a large apparel company (with annual revenue over one billion dollars and not primarily a sportswear company) that sells a large U.S. market share of the apparel made for babies and/or children. However, many candidate companies were not included simply due to space, and we anticipate including a larger selection of companies in future iterations of this scorecard. Companies were also restricted to those with headquarters located in North America or the EU, and we excluded companies that are private labels to retailers. Retailers and their private label brands were excluded because many have been included in the Mind the Store Campaign's Retailer Reportcard, or may be included in the future, and we aimed to avoid overlapping examinations of companies.

The ten companies scored were contacted before the start of scoring with the intent and scope of the project. Companies received a stock email and questionnaire outlining the scoring criteria. They had the opportunity to return the questionnaire with responses and meet with the staff of Defend Our Health to discuss the scorecard process and details. For the companies that declined to communicate with us, our analysis was restricted to the publicly available information that we could find. Draft scores were developed using publicly available information found through searches or shared directly by the companies. Copies of the draft scores were sent to the companies requesting any follow-up or added information to occur within three weeks. Meetings were held at the request of companies. Draft scores were altered when companies shared publicly available information that had not already been found. When partial credit was allotted, companies received 50% of the maximum allowable points per criteria or sub-criteria.

LETTER GRADE SCALE (out of 100)

A+	91 - 100	B-	45 - 50.9	D	15 - 19.9
A	73 - 90.9	C+	39 - 44.9	D-	10 - 14.9
A-	65 - 72.9	C	31 - 38.9	F	0 - 9.9
B+	59 - 64.9	C-	25 - 30.9		
B	51 - 58.9	D+	20 - 24.9		

Disclaimer: This document has been prepared using best practices and due diligence using information available at the date of publication. All information is subject to change. This report is published only for the purposes of reference, information sharing, and the wider public interest in chemicals management. Any liability shall not be borne by Defend Our Health due to the use of this report during the course of any investments or other decision-making processes. The content of this report is based on information from publicly available sources. If you represent a company that appears in this material that you believe is not accurately represented, supplemental information can be sent to info@defendourhealth.org