



Textile
Exchange

Deforestation-Free Call to Action for Leather

Frequently Asked Questions



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Deforestation-Free Call to Action for Leather

Frequently asked questions (FAQ)

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General

What are brands committing to by joining the Deforestation-Free Call to Action for Leather?

Brands commit to:

- Sourcing leather from deforestation/conversion-free farms by 2030 or earlier.
- Respecting human rights, including the rights of indigenous peoples and local communities.
- Having and implementing an effective grievance mechanism that identifies and addresses grievances that arise.

The guides that are developed as part of the Deforestation-Free Call to Action for Leather are intended to support brands along this journey.

The Deforestation-Free Call to Action for Leather scope is bovine leather only (from cattle, primarily raised for beef production), but we encourage companies to extend their deforestation-free policy and commitment to other commodities at risk of being linked to deforestation.

When was the Deforestation-Free Call to Action for Leather launched?

We opened the Deforestation-Free Call to Action for Leather for brands to register on March 21, 2023, the International Day of Forests. It was publicly launched on June 14, 2023.

Why is the initial focus on South America?

The Deforestation-Free Call to Action for Leather is global in scope, but South America is the priority region for action due to the higher pressures it currently faces related to the deforestation/conversion of natural ecosystems. The Deforestation-Free Call to Action for Leather will initially develop guides that are geared towards South America but can be applied globally as well.

What happens if we fail to meet the requirements of the Deforestation-Free Call to Action for Leather, including the milestones set for policy commitment development, supply chain mapping, and investment?

Below is a reminder of the key milestones for brands:

	Policy	Investment	Supply Chain Mapping
Within 6 months from signing up:	<ul style="list-style-type: none"> ✓ Developed ✓ Public commitment to deforestation/conversion-free 	<ul style="list-style-type: none"> ✓ Plan developed ✓ Initial investment target identified 	<ul style="list-style-type: none"> ✓ Plan & develop milestones to slaughterhouse ✓ Initial actions started
Within 1 year from signing up:		<ul style="list-style-type: none"> ✓ First investment made 	

Brands are also encouraged to develop additional milestones for all the activities required as part of their specific Deforestation-Free Call to Action for Leather roadmap, based on what they feel are realistic and practical to achieve. We suggest you undertake an internal review/ gap analysis of your existing systems, procedures, and sourcing patterns (see the Management Systems Guide for further details), which will provide an important basis of internal support. It is also expected that **changes will be made** through the reporting process as activities progress or if they are delayed.

We have set key timelines and milestones that we feel are achievable and realistic, as well as the level of ambition needed. These timelines were determined based on our experience and knowledge working with brands and in other commodity sectors. If specific milestones are not met, please contact us so that we can better understand your situation and provide you with any relevant support.

For brands that miss the 2030 target, it will be important to understand the reasons for this. You should keep track of progress from the early stages of implementing the activities of the Deforestation-Free Call to Action for Leather and reach out to us when progress is slower than expected or when there are bottlenecks/challenges experienced. This will help to inform us what additional support and/or solutions are required for brands to meet the Deforestation-Free Call to Action for Leather requirements.

Will the Deforestation-Free Call to Action for Leather apply for other textile materials through Textile Exchange?

Deforestation/conversion may be a risk for any land-based material within the textile industry. While this Deforestation-Free Call to Action for Leather is specific to leather, a prohibition on deforestation/conversion is already included in the Responsible Animal Fiber standards. In addition, as we move to accelerate more regenerative land management across multiple materials, our models and guidance will address deforestation/ conversion as well.

There are effectively two categories of materials that will likely have different approaches on conversion, but that should be linked through a higher-level strategy on forests and land:

- Forest-derived materials, such as wood and paper, also including man-made cellulosics.
- Materials from agricultural expansion (sometimes known as commodity-driven deforestation), including everything from soy to cotton to cattle (leather).

The supply chains for the different materials will likewise be at different stages of maturity (for example cotton has well-developed traceability systems, whereas leather has almost none) and will have different levels of associated risk by region. There will be overlapping solutions and approaches for each, but they will be tied together by the understanding of the importance of forests and natural ecosystems for mitigating climate change, protecting biodiversity, and the impacts on local communities.

Registration and eligibility for the Deforestation-Free Call to Action for Leather

When is the deadline to register?

There is no deadline for brands to register and be part of this collective action. Brands can decide when is most appropriate for them to register for the Deforestation-Free Call to Action for Leather as this will also depend on the brand's strategy, ambitions, resourcing, and priorities.

Do I have to be sourcing leather from South America or a high-risk area to join the Deforestation-Free Call to Action for Leather?

The Deforestation-Free Call to Action for Leather is for any brand sourcing leather, and it applies globally. While the risks and pressures are higher in South America, it does not mean that other countries are not at risk, including for human rights violations.

A key step is for brands to first determine whether they have the supply chain visibility to know with confidence that they are not sourcing from South America. This means having visibility to slaughterhouse as a minimum. If your visibility is with vendors who are not slaughterhouses, then the likelihood is that further supply chain mapping efforts are needed.

What is the role of leather manufacturers in the Deforestation-Free Call to Action for Leather?

Leather manufacturers are important actors within the leather supply chain. They play a critical role in delivering on deforestation/conversion-free sourcing, especially in terms of cascading requirements of the Deforestation-Free Call to Action for Leather to the slaughterhouse and farm level, engaging with suppliers and supporting supply chain mapping activities, and implementing traceability systems.

Deforestation/conversion of natural ecosystems

How is deforestation-free defined in the context of this Deforestation-Free Call to Action for Leather?

The Deforestation-Free Call to Action for Leather refers to the [Accountability Framework Initiative's definition](#) of no deforestation. This refers to gross deforestation and prohibits both legal and illegal deforestation, including direct and indirect farms. The cut-off date is December 31, 2020 (in alignment with the European Deforestation Regulation (EUDR)).

Is conversion of natural landscapes included?

Conversion is included and will be expected to be addressed in a company's policy. However, we recognize that due to the lack of available data, monitoring methodologies, and verification systems for conversion, initial targets will be set only for regions where risk has been identified and monitoring tools are available. The Cerrado and Chaco, in particular, are specific areas in South America that are facing high conversion pressures and also have monitoring systems in place that will allow for effective action.

Cut-off dates and target dates

Why is the target date 2030 when the EUDR and others talk about 2025?

Many NGO initiatives have set targets for 2025. The European Deforestation Regulation requires that hides imported into the EU must be from deforestation/conversion-free supply chains and implementation of this target is also expected to be 2025.

The benefit of having an earlier target date is that it can increase pressure and accelerate the implementation of activities and brand performance. However, the Deforestation-Free Call to Action for Leather takes a longer-term and more practical approach for the following reasons:

- Leather supply chains are long and complex: They are further away from source when compared to their peers in the beef sector, and as such will require more time to gain visibility and to cascade down requirements within their supply chains.
- The leather industry is in the early stages of addressing deforestation/conversion. Brands will require time to tackle the challenges being faced and collaboration with the beef sector will be key.

Regardless, brands need to take immediate action by:

- Communicating with their suppliers about the policy requirements and especially the need to stop deforesting and converting natural ecosystems.
- Investing in solutions that support wider industry transformation (see the Investment Guide).

Can the commitment be earlier than 2030?

We encourage brands to set an earlier target if it is practical and sensible to do so. We recognize that not all brands are starting with the same level of knowledge and visibility of their bovine leather supply chains and additional time may be required for the development and implementation of activities critical to ensuring deforestation/conversion-free supply chains.

What is the difference between the cut-off date of December 31, 2020, and the target date December 31, 2030?

A cutoff date is a specific date after which the clearance of natural forests and ecosystems renders the affected area/production unit and the commodity produced (in this context, cattle) non-compliant with no deforestation/conversion commitments (Accountability Framework Initiative). Cut-off dates are essential as they send clear market signals and allow brands to establish precise, actionable, and monitorable commitments related to deforestation/conversion-free supply chains.

The target date is the date by which brands must meet their commitment to deforestation/conversion-free leather sourcing.

Policy commitment requirements

What guidance will be provided on how to implement meaningful grievance mechanisms?

As part of the Deforestation-Free Call to Action for Leather, we have put together a briefing note about the importance of grievance mechanisms, what the Deforestation-Free Call to Action for Leather specifically requires, and the available tools and guidance that brands can refer to when developing a new grievance mechanism or expanding their existing one.

For brands that commit to the Deforestation-Free Call to Action for Leather, what this means in practical terms is, as part of your brand's policy commitment:

- Publicly state that you will develop/are developing/have developed an effective grievance mechanism in line with the Effectiveness Criteria set out within the UN Guiding Principles of Human Rights
- Include the scope for both environmental (deforestation/conversion) and social (human rights) concerns.
- Once the brand-level grievance mechanism has been developed, you will:
- Carry out targeted sharing with key stakeholders through documentation and/or communications.
- Engage with suppliers to put a similar mechanism in place.

Investments

Does the brand have to make an investment if our supply chain does not source leather from high-risk areas?

Yes, they do. If a brand does have visibility to slaughterhouse level and can say with confidence that they do not source from higher-risk regions, then the Deforestation-Free Call to Action for Leather requires brands to make an investment for a minimum of two years or until the brand has converted all its leather sourcing to verified deforestation/conversion-free leather (see the Investment Guide).

Investments do not need to be linked to geographies you are currently sourcing from and can instead be made in geographies where risk is considered higher. For example, one mechanism for investment can be through [Impact Incentives](#). See the Investment Guide for more details.

An important note is that while the risks and pressures are higher in South America, it does not mean that other countries are not at risk, including for human rights violations. Therefore, brands are encouraged and required to understand and investigate potential risks related to all countries they source from, not only from the deforestation/conversion perspective, but also from the human rights perspective.

Are investments in regenerative agriculture accepted within the scope of the Deforestation-Free Call to Action for Leather?

Investments in regenerative agriculture are certainly important. However, the focus of the Deforestation-Free Call to Action for Leather is on stopping deforestation and conversion and/or increasing traceability along the whole supply chain. In that regard, if the regenerative agriculture investments specifically address either of these, then they (or a portion of them) might be considered as meeting the Deforestation-Free Call to Action for Leather requirements. Applicability of these types of projects would be considered by the Deforestation-Free Call to Action for Leather partner organizations on a case-by-case basis.

To be considered within scope of the Deforestation-Free Call to Action for Leather, the regenerative project must be on cattle raising farms in regions where there is higher risk of deforestation/ conversion.

All projects, including those related to regenerative agriculture, must have third-party verification of impacts for any claims that your brand's investment has contributed to deforestation/ conversion-free cattle farming.

Supplier engagement

What guidance is provided to the brand to engage suppliers?

The Supplier Engagement Guide provides good practice tips for developing a supplier engagement strategy and plan, including details on the suggested engagement activities. Where sensible, it also includes more detailed guidance for specific activities, such as a draft email text that brands can share with their suppliers during that initial engagement on the Deforestation-Free Call to Action for Leather requirements.

Would Textile Exchange or the Leather Working Group provide formal letters or statements with letterhead that brands can leverage when reaching out to suppliers on transparency work?

This is something that can be developed and shared with brands.

Supply chain mapping

Do brands need to map their supply chains all the way back to farm?

The Deforestation-Free Call to Action for Leather requires brands to map their supply chains to slaughterhouse during Phase One of the roadmap. Mapping to farm level is certainly not possible for brands to do individually. Slaughterhouses ultimately will play a strong role in this mapping process. Phase Two will focus on effective engagement with slaughterhouses, which will need to be conducted in close collaboration with the beef sector and with other existing initiatives.

Can a brand identify whether the sourced leather is from a deforestation/conversion-free committed slaughterhouse when traceability isn't clear at the tannery?

The short answer is no. If traceability has not been implemented (purchase control systems are not in place) between the slaughterhouse and farm levels and/or at the tannery stage, then it will not be possible for brands to credibly know whether the leather they source comes from deforestation/conversion-free farms. Within the first phase of the Deforestation-Free Call to Action for Leather, brands are expected to prioritize supply chain mapping to the slaughterhouse stage. Guidance on deforestation/conversion-free requirements at the slaughterhouse stage and traceability requirements between the slaughterhouse and farms will be developed as part of the resources to support phase two of the Deforestation-Free Call to Action for Leather.

How can direct supplier to a brand be verified?

Verification of data from direct suppliers to a brand or retailer will rely upon internal systems and processes which are likely to be well established based on purchasing relationships. The Deforestation-Free Call to Action for Leather expects that at least first-party verification of data must be in place. As a minimum, organizations providing data for supply chain mapping must provide some form of written declaration to provide assurance about the systems and processes in place to ensure accuracy and validity in relation to products/materials supplied to your brand (for further details and example text see the Supply Chain Mapping Guide). Further verification either through second or third-party means is encouraged and could either be conducted by members of a brand's team which might conduct on-site verification of data and documentation or through a contracted third party such as a certification body.

Does the commitment to develop product-level traceability need to be stated/communicated somewhere?

This is stated as part of the commitment form and does not need to be stated publicly in addition. However, if a signatory brand wishes to communicate about their plans, targets, and timelines for work in this area we would encourage transparency. Further guidance and resources on product-level traceability will be released as part of the Deforestation-Free Call to Action for Leather guidance.

Verification of deforestation/conversion-free farms

After mapping the supply chain to slaughterhouse level or farm level, how do I verify that my leather is deforestation/conversion-free?

There are two phases to the Deforestation-Free Call to Action for Leather roadmap:

- **Phase One: Supply chain readiness** sets the key building blocks for brands and their suppliers to source leather from deforestation/conversion-free farms. Available documentation for this phase guides brands on how to:
 - Develop a commitment to deforestation/conversion-free sourcing of leather and the internal systems that allow for effective policy implementation.
 - Build and manage relationships with suppliers towards policy compliance
 - Gain visibility of their supply chains
 - Support wider sector initiatives through credible investments
 - Identify, manage and monitor risks within their supply chain (guide in development)

- **Phase Two: Sourcing** marks the point at which brands begin sourcing leather from deforestation/conversion-free farms. Documentation will be developed for this phase to guide brands on how to:
 - Send clear market signals to slaughterhouses.
 - Track the movement of deforestation/conversion-free leather between slaughterhouses.
 - Support wider sector initiatives to accelerate action

Verification remains a challenge faced by many commodities, not just limited to leather and cattle. It is especially complicated with the cattle industry because, unlike other commodities, cattle move across different farms to the slaughterhouse. There is some guidance available for slaughterhouses (CGF Forest Positive Coalition), and tools already available at the production end for verified deforestation/conversion-free farms (such as Leather Impact Incentives, which require third-party verification that individual farms are deforestation/conversion-free). Some companies may decide to develop their own verification mechanisms as well. These will be reviewed as part of Phase Two.

How can I verify that a farm meets the December 31, 2020 cut-off date?

Developing guides for Phase Two (see question above) will include providing guidance for how deforestation/conversion can be mapped against the December 31, 2020 cut-off date. There are some national/regional level geospatial and satellite monitoring tools available, which we will identify and share as part of the guide development.

Does a third party need to be involved in declaring farms policy compliant as per the Deforestation-Free Call to Action for Leather requirements or is the assessment self-declared?

The Deforestation-Free Call to Action for Leather will require third-party verification in order to provide the confidence and credibility to brands and their consumers that the leather products they are using are from verified-policy compliant cattle farms.

Claims & Reporting

What are reporting expectations and requirements?

Brands will be required to report annually in Textile Exchange’s Materials Benchmark and the Leather Working Group Sourcing Declaration (if applicable). Although disclosure is a requirement, brands and retailers are not required to validate annual reporting until after 2025. The specific requirements beyond 2025 are being defined and developed and will be shared at a later date.

Why should the leather industry be involved in the Deforestation-Free Call to Action for Leather when deforestation/conversion in cattle is being driven by the beef industry?

While the beef industry does drive much of the cattle production, the leather industry still plays an important role and has shared responsibility to finding solutions to these global concerns. The latest IPCC assessment report reiterated the urgent need for a systemwide transformation to secure a net-zero, climate resilient future, and leather brands together with other sectors play a pivotal role in achieving this.