



Getting Started on Leather Due Diligence: A good practice guide for brands and retailers

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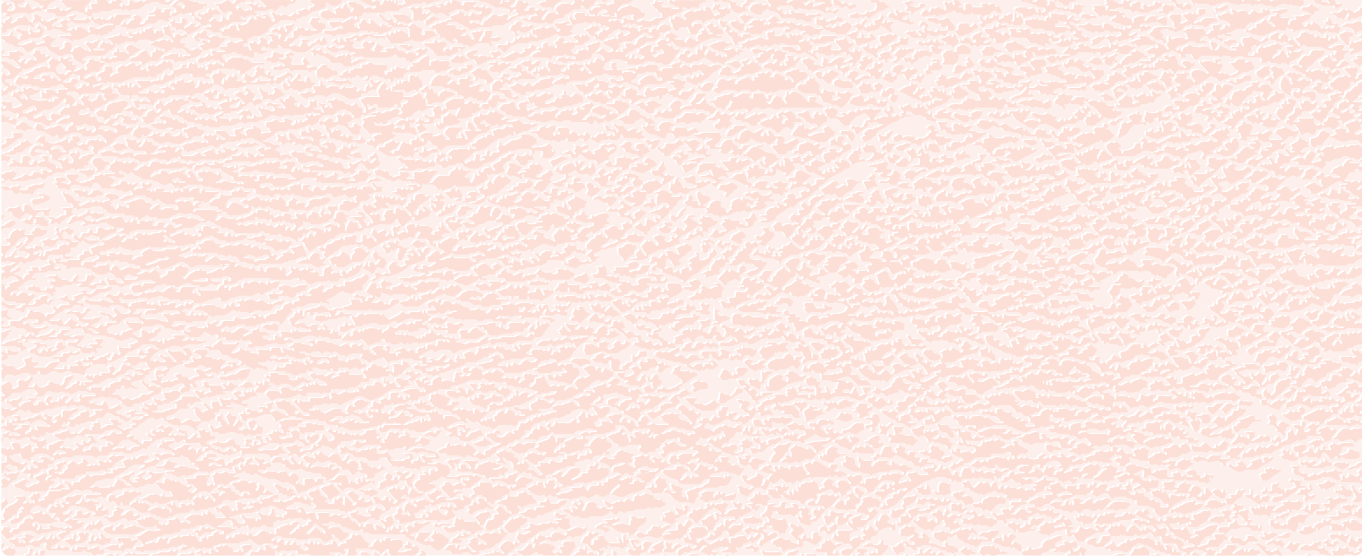


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Background and objectives

Over the past fifteen years, a growing body of voluntary standards and regulations has sought to strengthen expectations for businesses to conduct human rights and environmental due diligence (HREDD). These include the [UN Guiding Principles on Business and Human Rights](#), the [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#), and the forthcoming [EU Corporate Sustainability Due Diligence Directive](#). Due diligence refers to the process by which enterprises identify, prevent, mitigate and account for actual and potential adverse impacts across their operations, supply chains and business relationships.¹

In this context, the [Ethical Trading Initiative](#) (ETI) in partnership with [ETI Bangladesh](#), [Bangladesh Labour Foundation](#) (BLF) and [Mondiaal FNV](#), engaged [Beyond Sustainable Retail Group](#) (Beyond) to develop this introductory guide to HREDD in the leather industry, for brands and retailers. The project is part of a broader programme funded by UK International Development under its [Sustainable Manufacturing and Environmental Pollution](#) (SMEP) programme.

Leather is a durable, versatile, and sometimes biodegradable material widely used in fashion, automotive, and furniture industries. However, sourcing of raw hides and skins and processing them into leather, can involve significant social and environmental risks if not effectively managed. These risks can be particularly difficult to address due to the complex and fragmented nature of global leather supply chains.

The guide seeks to:

- ▶ Build brand awareness of salient risks and good practice approaches to due diligence.
- ▶ Direct brands to additional research and resources to strengthen due diligence.
- ▶ Encourage brands to take meaningful steps to advance human rights and environmental due diligence in their leather supply chains.

The guide is structured into five key sections:

- 1 Getting started with due diligence: Foundational actions
- 2 Mapping the supply chain: Traceability, and chain of custody
- 3 Due diligence in leather manufacturing
- 4 Due diligence in animal slaughter
- 5 Due diligence in livestock production

Scope, inclusions and exclusions:

- ▶ For the purposes of this guide, the leather industry is defined as beginning when a raw hide enters industrial processing to prevent decomposition and is transformed into leather. From this point forward, the sector holds direct responsibility for managing its impacts, while also retaining a duty to conduct due diligence on upstream meat processing and livestock production, and to use its influence to encourage better environmental and social practices.
- ▶ This guide focuses exclusively on leather derived from livestock raised for food and meat production, which accounts for approximately 99% of global leather.² Skins from exotic species are excluded.
- ▶ Given the salience of animal welfare risks in livestock and meat production, these considerations are included.
- ▶ Salient risks and due diligence practices at final goods manufacturing (i.e. tier 1) are excluded, as these have been extensively addressed in other resources and are generally more mature in practice.



Methodology

Summary

The research underpinning this guide was carried out in three key phases:

- ▶ **Consulting with subject matter experts** worldwide to capture diverse perspectives on leather due diligence.
- ▶ **Conducting desktop research**, including a comprehensive literature review and analysis of public disclosures from 20 leather-retailing brands.³
- ▶ **Assessing current brand practices** against the [OECD Responsible Business Conduct six-step due diligence framework](#).

Although not the focus of this guide, the project team also conducted a five-day field trip to Bangladesh to examine country-specific challenges within the leather industry. The visit included site visits to tanneries and consultations with a range of industry stakeholders.

Consultations

Eighteen one-hour consultations were completed with a diverse group of stakeholders, including brands (small-medium-large), leather manufacturers, employer representatives, labour representatives, and non-government organisations. These discussions provided valuable insights into current practices, challenges, and expectations around human rights and environmental due diligence in the leather sector. The table below lists the organisations included in the consultation phase.

Brands:

- ▶ adidas
- ▶ Tapestry
- ▶ Longchamp
- ▶ VF Corp
- ▶ Mulberry
- ▶ John Lewis Partnership
- ▶ Dr Martens
- ▶ Ralph Lauren

Other:

- ▶ Leather Working Group
- ▶ Textile Exchange
- ▶ Confederation of National Associations of Tanners and Dressers of the European Community (COTANCE)
- ▶ International Labour Organisation
- ▶ IndustriALL Global Union
- ▶ Sustainable Leather Foundation
- ▶ World Wildlife Fund
- ▶ International Council of Tanners
- ▶ JBS
- ▶ Prime Asia



Summary

Leather is a widely used in fashion, furniture, and automotive industries, valued for its durability, repairability, longevity, and natural aesthetic. As a by-product of the meat industry, hides that might otherwise become waste are transformed into a long-lasting material. The industry provides employment for thousands of workers worldwide and generates significant economic value for producing countries.

At the same time, leather can be linked to human rights and environmental risks. These vary by country and context but can be severe if not effectively managed. At the tannery level, risks may include inconsistent health and safety practices and inadequate wastewater treatment. Further upstream, brands may be indirectly linked to risks in meat processing and livestock production, such as inhumane animal welfare, deforestation, and the displacement of Indigenous communities. While many of these risks can be reduced through effective due diligence and responsible management, influence becomes increasingly limited the further upstream risks occur.

These challenges are compounded by the structural complexity of the leather supply chain. Hides and skins are separated from the carcass at slaughter, yet birth farm-to-slaughterhouse traceability exists in only a few regions. With limited commercial value, hides are often treated as by-products, giving meat processors little incentive to invest in identity preservation systems or meet downstream due diligence demands. Meanwhile, chain of custody systems connecting tanneries to slaughterhouses remain in the early stages of development. Together, these factors erode visibility and limit the ability of tanneries, manufacturers, and brands to act effectively on their own.

Despite these challenges, brands are expected to conduct risk-based human rights and environmental due diligence (HREDD) across their supply chains, in line with OECD guidance. HREDD is not a one-off exercise but a continuous, proactive process. It requires supply chain mapping, in-depth risk analysis, meaningful stakeholder engagement, and collective action. **It requires forging genuine partnerships with a range of leather industry stakeholders and rightsholders, along with critical actors in the meat processing and livestock industry.** Addressing risks deeper in the supply chain depends on building trust, taking shared ownership, and incentivising continuous improvement through responsible purchasing practices.

Progress on environmental risks — such as water pollution, deforestation, and greenhouse gas emissions — has been spurred by regulations, public commitments and environmental management systems. However, our research indicates that **human rights risks, including occupational health and safety, freedom of association, fair wages, and child labour, remain significant in some countries and comparatively under-addressed**. We encourage brands to bring human rights due diligence up to the same level of rigour as environmental management. A consistent and integrated approach to HREDD is increasingly essential for meeting net zero commitments, achieving a just transition, upholding international human rights standards, and complying with emerging regulations such as the EU Corporate Sustainability Due Diligence Directive (CSDDD).

Encouragingly, we also identified examples of innovation and leadership across the industry. Companies taking a pragmatic step-by-step approach have shown that meaningful progress is possible for brands of all sizes. For those just getting started, practical first actions include:

- ▶ **Updating** corporate human rights and environmental policies to address leather-related risks.
- ▶ **Mapping** leather supply chains, with an initial focus on tanneries.
- ▶ **Building** relationships with tanneries, worker representatives and affected communities and starting preliminary HREDD assessments.
- ▶ **Partnering** to mitigate adverse impacts, including through technical and financial support, and committing to responsible purchasing practices.

Whether you are a brand just getting started or a brand looking to deepen existing efforts, this guide is designed as a starting point for ongoing exploration and engagement with the leather industry and the people and communities it affects.

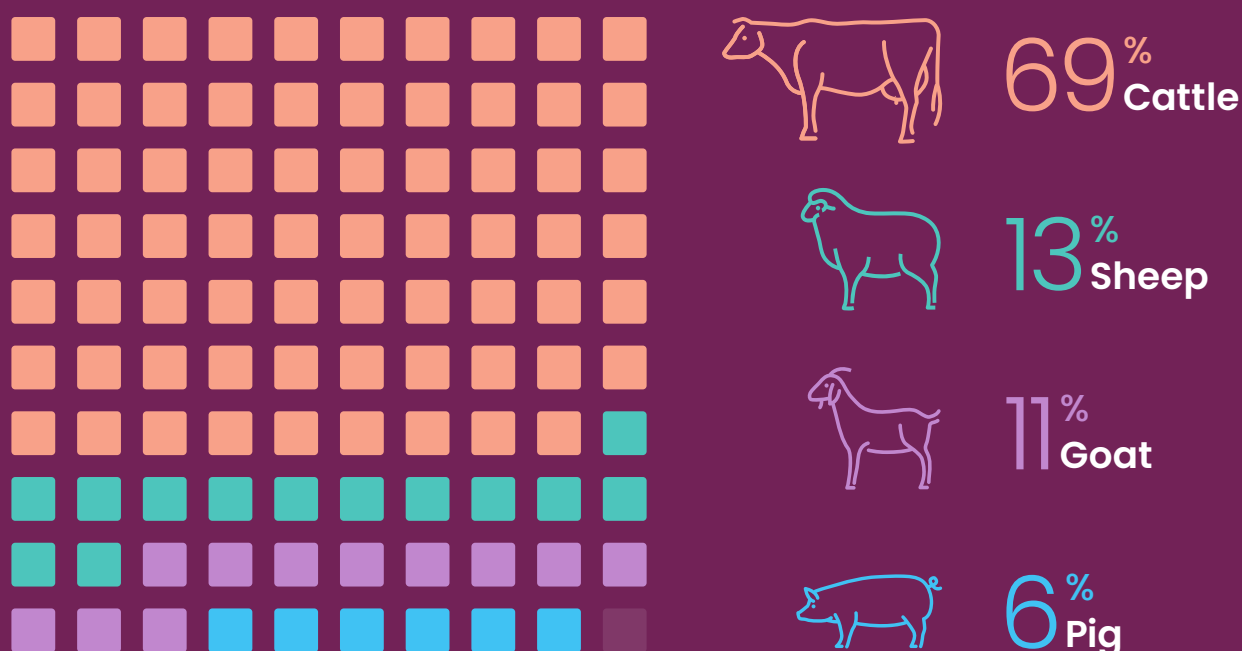


Scale and structure of the leather industry

The leather industry is global in scale and economically significant, processing more than 7.3 million tonnes of cattle hides each year.⁴ Almost 100% of all leather originates from hides and skins often considered a by-product that would otherwise be discarded by meat and dairy industries.⁵

Production is concentrated in a handful of major countries, including China, Russia, Italy, Brazil, and India.⁶ Cattle hides account for the majority of global output (around 69%), followed by sheep (13%), goats (11%), and pigs (6%). Exotic leathers such as crocodile and snake skins represent less than 1% of production.⁷

The tanning industry — where raw hides are transformed into finished leather — forms the core manufacturing segment. The industry was valued at approximately US\$28.4 billion in 2025 and is projected to reach US\$34.8 billion by 2034.⁸



Salient risks in the leather supply chain

Leather offers many benefits but can also be associated with human rights and environmental risks. Some of these risks arise directly from the leather manufacturing process, while others are linked to the meat processing and livestock industry. The diagram below provides a snapshot of some of the most salient risks across leather manufacturing, animal slaughter, and livestock production. Many of these risks can be mitigated through effective due diligence and responsible management practices. However, limited visibility and leverage make it harder for brands to address risks further upstream.

Brands have their most direct responsibility and leverage at the leather manufacturing level. Here, long-term partnerships, shared risk assessments, responsible purchasing practices, and technical support can help drive continuous improvements. Further upstream in animal slaughter and livestock production, brands may not directly cause or contribute to adverse impacts. However, under OECD guidance and the UNGPs, they are still expected to identify, prioritise, and take proportionate action – using their influence, building leverage, and, where necessary, engage in collective action.

The following sections of this report outline key global risks, including country-specific examples. The severity and likelihood of these risks vary according to regulatory frameworks, organisational capacity, and the maturity of social dialogue and industrial relations. Consistent with OECD guidance, brands are encouraged to go beyond desktop assessments and actively engage with leather industry stakeholders – including workers, communities, suppliers, and multi-stakeholder initiatives – to develop a more nuanced understanding of country, region, and site-specific conditions.



Livestock industry

Livestock production



Meat processing industry

Animal slaughter



Leather industry

Leather manufacturing



Human rights

- | | | |
|--|---|---|
| <ul style="list-style-type: none"> ▶ Occupational health and safety ▶ Low wages and informal employment ▶ Child labour ▶ Forced labour ▶ Freedom of association and collective bargaining ▶ Gender inequality ▶ Indigenous rights and land tenure | <ul style="list-style-type: none"> ▶ Occupational health and safety ▶ Low wages and precarious employment ▶ Child labour ▶ Forced labour ▶ Freedom of association and collective bargaining ▶ Gender inequality ▶ Community health and environmental impacts | <ul style="list-style-type: none"> ▶ Occupational health and safety ▶ Low wages and precarious employment ▶ Child labour ▶ Forced labour ▶ Freedom of association and collective bargaining ▶ Gender inequality ▶ Community health and environmental impacts |
|--|---|---|

Animal welfare

- | | | |
|--|---|--|
| <ul style="list-style-type: none"> ▶ Health, shelter and nutrition ▶ Handling, restraint and transport ▶ Painful procedures and health management | <ul style="list-style-type: none"> ▶ Improper handling and restraint ▶ Stunning and slaughter methods | |
|--|---|--|

Environment

- | | | |
|---|---|--|
| <ul style="list-style-type: none"> ▶ Deforestation and land-use conversion ▶ GHG emissions ▶ Water use and contamination | <ul style="list-style-type: none"> ▶ Energy use and GHG emissions ▶ Water use and pollution ▶ Solid waste ▶ Air emissions and odour | <ul style="list-style-type: none"> ▶ Water consumption and pollution ▶ Hazardous chemicals ▶ Air emissions and toxic exposures ▶ Energy use and GHG emissions ▶ Solid waste |
|---|---|--|

Getting started with due diligence: Foundational actions

Although leather supply chains are complex, brands of all sizes and levels of experience can make meaningful progress. This section highlights key foundational actions for brands beginning their leather due diligence journey. Subsequent sections build on these foundations, exploring supply chain mapping and salient risks in greater depth, and illustrating what 'good' and 'better' practice looks like. These approaches are grounded in OECD guidance and established industry experience to support continuous improvement.



Due diligence in leather manufacturing

The following preliminary actions are recommended for brands engaging in due diligence in leather manufacturing.

Set policies

A clear, principles-based policy signals your priorities, aligns with recognised standards and sets expectations across the leather supply chain.

Foundational actions:

- ▶ Develop high-level policies and commitments to address key leather manufacturing risks, informed by meaningful engagement with industry stakeholders and affected rightsholders.
- ▶ Share policies with direct suppliers, and other relevant stakeholders to support alignment and accountability.



Map tanneries

Mapping tanneries used in leather production is the first step in conducting effective human rights and environmental risk assessments.

Foundational actions:

- ▶ Request tannery names, locations, and production details from direct suppliers.
- ▶ Where possible, verify data accuracy with third-party sources and stakeholder engagement.



Identify and assess risks

Identifying, assessing and prioritising salient risks in partnership with tanneries and rightsholders is critical to focusing resources on the most adverse impacts.

Foundational actions:

- ▶ Conduct desktop research, assessments, and audits to understand salient risks at country and facility level, incorporating worker and community perspectives where possible.
- ▶ Prioritise risks based on severity and likelihood and engage more deeply with tanneries and rightsholders to understand systemic issues, including the role of brand purchasing practices.



Address impacts

Supporting tanneries and rightsholders to prevent and mitigate adverse impacts is key to continuous improvement and safeguarding human rights and the environment.

Foundational actions:

- ▶ Help suppliers and tanneries to address identified human rights and environmental issues, providing training, technical assistance and other practical support where needed.
- ▶ Collaborate with industry stakeholders and rightsholders to tackle systemic challenges, while committing to responsible purchasing to encourage continuous improvement.

Due diligence in animal slaughter and livestock production

The following preliminary actions are recommended for brands engaging in due diligence in animal slaughter and livestock production.

Set policies

A clear, high-level policy signals commitment to addressing slaughter and livestock production risks, while acknowledging constraints on visibility and leverage, and the critical role of partnerships.

Foundational actions:

- ▶ Develop policies and commitments to address specific slaughter and livestock-related risks, including meaningful engagement with industry stakeholders and impacted rightsholders.
- ▶ Share policies with direct suppliers, tanneries, and other stakeholders.



Map slaughterhouses

Mapping slaughterhouses supports the identification of upstream human rights, environmental, and animal welfare risks.

Foundational actions:

- ▶ Use standardised tools, such as questionnaires developed by LWG (see [next chapter](#)) and work in partnership with direct suppliers and tanneries to capture slaughterhouse names and locations.
- ▶ Where possible, verify data accuracy with third-party providers and other trusted stakeholders.



Identify and assess risks

Identifying, assessing and prioritising salient risks helps focus resources on the most adverse upstream impacts and reveals opportunities to strengthen leverage.

Foundational actions:

- ▶ Conduct desktop research to form an initial understanding of country and regional risks, incorporating worker and community perspectives where possible. Consider geospatial analysis, supplier surveys and other tools to support deforestation risk assessments.
- ▶ Prioritise risks based on severity and likelihood and engage more deeply with rightsholders to understand systemic issues and opportunities to enhance leverage and support collective action.



Address impacts

Preventing and mitigating adverse impacts at the slaughterhouse and livestock level requires collaboration with suppliers, industry partnerships, and the broader meat and livestock industry.

Foundational actions:

- ▶ Collaborate on pilot projects with suppliers, multi-stakeholder initiatives, or NGOs to address identified human rights, environmental, and animal welfare concerns.

Certification and audit

Certification and audit standards have brought some benefits to workers around the world through setting human rights and environmental standards in global supply chains. Demonstrating compliance with these standards has improved access to international markets for factories and producers. However, certification and audits as a tool to assess, manage and respond to human rights risks does have significant limitations.

Certification and associated audit processes can work well on tangible risks that can be inspected and easily verified, for example health and safety risks. For workers experiencing significant abuse however, such as forced labour and gender-based violence and harassment (GBVH), they are unlikely to feel comfortable identifying these problems to external auditors and certifiers.

Therefore, certification and audit processes are generally ineffective in identifying these problems and leading to lasting resolution. Whilst certification can be seen as one tool within a broader toolbox of risk management, it cannot replace the human rights and environmental due diligence process.



Responsible purchasing practices

A company's day-to-day purchasing practices significantly influence working conditions in the supply chain. Short lead times, last-minute order changes, inaccurate forecasting, prices set below responsible production costs, and late payments undermine suppliers' ability to plan capacity and operate efficiently. This often results in excessive overtime, suppressed wages, and reliance on temporary labour. As these pressures cascade through the supply chain, the risk of severe exploitation increases.

Purchasing practices refer to the actions a buying company takes when sourcing products, raw materials, or services. Responsible purchasing practices go beyond cost and quality considerations to account for broader social, environmental, and human rights impacts. By integrating responsible purchasing principles into procurement decisions, companies can reduce negative impacts on workers and communities, strengthen supplier relationships, and build long-term supply chain sustainability. Such practices also deliver business benefits, including improved product quality, greater supply chain resilience, stronger brand loyalty, and enhanced reputation.

A recurring theme in supplier feedback is the lack of incentives to invest in higher standards when buyers fail to recognise or reward these efforts.

To embed HREDD and responsible purchasing practices effectively, companies should:

- ▶ Build trust and open communication; co-develop solutions grounded in operational realities.
- ▶ Align audits and certifications with HREDD to avoid duplication and support continuous improvement.
- ▶ Incentivise good practice through longer contracts, guaranteed orders, public recognition, and preferential sourcing.
- ▶ Develop two-way codes of conduct that set mutual responsibilities and specify buyer support.
- ▶ Balance responsibility in contracts, sharing HREDD obligations rather than shifting risk to suppliers.
- ▶ Implement responsible costing that reflects the true cost of higher standards and accounts for externalities.
- ▶ Enable cascading by equipping suppliers to pass good practice down their own supply chains.
- ▶ Strengthen governance by assigning senior leadership to oversee HREDD and responsible purchasing.
- ▶ Engage stakeholders to assess links between purchasing practices and human rights risks and take corrective action.

To support companies, ETI developed the [Common Framework for Responsible Purchasing Practices](#), which sets out key principles and actions for apparel, footwear, and manufacturing companies to respect human rights and address salient supply chain risks. The framework has also been [adapted](#) for the manufacturing industry and is available in Bengali, English, Hindi and Mandarin.



Mapping the supply chain: Traceability, and chain of custody

For brands and retailers working with leather, improving visibility into the supply chain is a critical first step in conducting effective due diligence on human rights, environmental and animal welfare impacts. Without visibility of key actors and processes, brands cannot reliably identify, assess, or respond to risks and adverse impacts. To support this, brands rely on supply chain mapping, traceability, and chain of custody systems — three distinct but interrelated concepts.⁹

- ▶ **Supply chain mapping:** Identifying the actors in a supply chain and the relationships among them.¹⁰
- ▶ **Traceability:** The ability to track and verify a material's movement through defined production, processing, and distribution stages (ISEAL, adapted from ISO 22095:2020).¹¹
- ▶ **Chain of custody (CoC):** A system for transferring, monitoring and controlling inputs, outputs, and associated attributes as they move through the supply chain (ISEAL, adapted from ISO 22095:2020).¹²

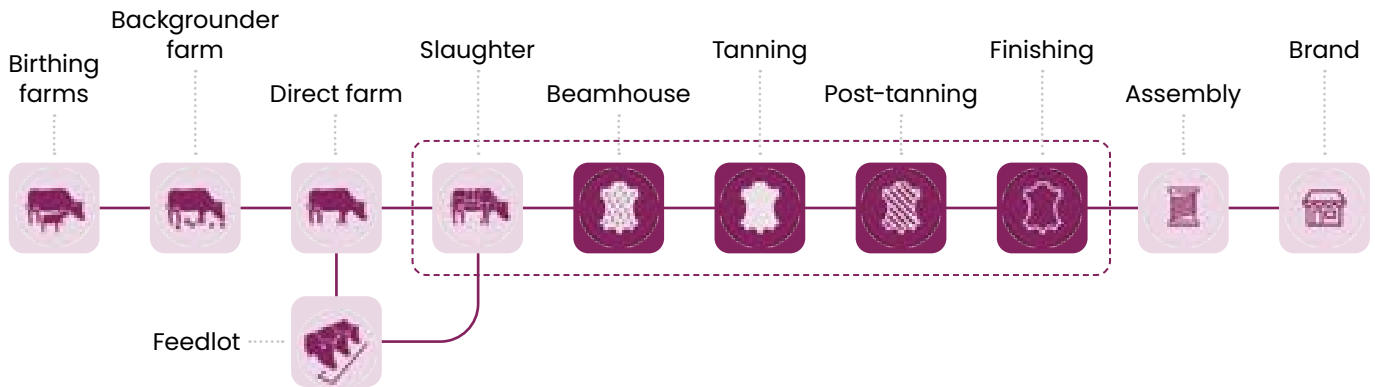
Supply chain mapping looks back to understand a material's history and origin, while CoC tracks material forward to the final buyer. Traceability refers to the ability to track materials in either direction.

Brand practices typically mature in three phases: first, mapping supply chain tiers; then, where feasible, introducing batch or product level traceability where feasible; and finally, implementing CoC systems. Progress through these phases directly determines how accurately and comprehensively brands can conduct due diligence.

Growing consumer, investor and regulatory scrutiny on human rights, animal welfare, climate change and biodiversity loss are driving the leather industry toward end-to-end mapping and traceability. Voluntary frameworks such as the [Science Based Targets Initiative](#) and the [Taskforce on Nature-related Financial Disclosures](#), as well as regulations like the EU Deforestation Regulation (EUDR), increasingly require farm-to-finished-product visibility — making these capabilities essential for compliance, market access and credible sustainability reporting.

The leather supply chain

The leather supply chain is long and complex, with multiple steps from birth farm to brand or retailer. The diagram below provides a simplified overview of key processes in the bovine leather supply chain.¹³ While the processes differ slightly, the structure is similar to other livestock such as sheep, goats, and pigs.



Brands face several challenges in achieving end-to-end traceability in leather supply chains.¹⁴ These include, among others:

- ▶ **Batch separation at slaughter:** Hides and skins are typically separated from the carcasses in batches. Traceability of individual hides back to the farm is generally lost after collection and sale.
- ▶ **Cultural, systemic and regulatory differences:** Birth farm-to-slaughterhouse traceability is feasible only in select regions, such as the European Union. In Brazil for example – the world’s largest beef producer, with 238.6 million head of cattle in 2023¹⁵ – the national System of Traceability for the Cattle and Buffalo Chain (SISBOV) currently applies only to direct farm relationships.¹⁶
- ▶ **Economic incentive:** Raw hides and skins often have lower commercial value than meat, limiting slaughterhouses’ investment in technologies such as laser marking or radio frequency identification (RFID) that enable identity preservation.
- ▶ **Limited buyer leverage:** Small- and medium-size hide traders and tanneries typically have limited bargaining power to request traceability measures from larger slaughter operators.
- ▶ **Informal slaughter practices:** In some countries, animal ownership and slaughter are informal, largely carried out by small family-run farms and butchers, that lack resources to implement effective traceability systems.
- ▶ **Lack of standard and consistent CoC systems:** Practices vary from simple handshake agreements and paper records to advanced digital traceability platforms with third-party verification or forensic testing.

Current brand practices

Based on an assessment of brand public disclosures and stakeholder consultations, this section provides a high-level overview of current practices on supply chain mapping, traceability, and CoC. These practices, essential for effective human rights, environmental and animal welfare due diligence, are presented in alignment with the OECD framework.

1 Embed responsible business conduct into policies and management systems

Many brands have begun integrating supply chain mapping and traceability expectations into their sourcing and sustainability policies and contracts, requiring disclosure of hide origins, including country and slaughterhouse location. Leaders have set public targets for full supply chain mapping, sometimes down to farm level in high-risk regions, and back this with CoC certification requirements.

2 Identify and assess actual or potential adverse impacts

Brands generally have good visibility of their tannery networks and are now working to map their supply chains back to the slaughterhouse. However, this work is still in its infancy, and only a small number of companies report comprehensive coverage. To accelerate progress and address emerging deforestation due diligence requirements, the [Leather Working Group](#) (LWG) has published a guidance note and standardised questionnaire to promote consistent, systematic data collection.¹⁷ LWG manufacturer audits also encourage improvement by assessing the proportion of hides traceable to the slaughterhouse or collection point. Not yet a critical scoring requirement, it is expected to become so in the revised standard.¹⁸

To strengthen data collection and verification, some brands are collaborating with supply chain partners to pilot third-party solutions. Common approaches include:

- ▶ Third-party document verification and on-site audits¹⁹
- ▶ Digital traceability platforms²⁰
- ▶ Isotope and DNA testing²¹
- ▶ Laser marking and physical stamping²²

Despite these advances, few brands currently achieve batch or purchase order level traceability beyond the tannery. A small number have trialled event-based farm-to-slaughterhouse technologies in high-risk regions to support more detailed risk assessments.²³

3 Cease, prevent or mitigate adverse impacts

Drawing on early mapping exercises, brands are focused on closing data gaps and improving consistency. High-quality, consistent data is essential for identifying where the greatest risks lie and for designing effective mitigation measures. Some brands have deployed digital traceability platforms; others are piloting standardised data-capture protocols²⁴ to enable accurate, scalable reporting. Leading companies also encourage full CoC certification²⁵ in high-risk geographies or where on-product claims require independent verification. To support credible traceability and claims, LWG is developing a CoC standard²⁶ — initially focused on segregation in tanneries, with plans to extend further upstream over time.

4 Track implementation and results

Brands monitor mapping and traceability progress through internal reviews, and in some cases, use third-party assurance. Aggregated data is visualised in digital traceability systems, product life cycle management (PLM) platforms and other dashboards, enabling companies to track coverage, data quality and supplier performance over time.

5 Communicate how impacts are addressed

Many companies report quantified mapping and traceability progress in their sustainability reports, sometimes including breakdowns by supply chain tier and country of origin. Clear reporting not only strengthens credibility but also helps stakeholders understand how risks are being identified and addressed, reinforcing trust.

6 Provide for or cooperate in remediation

Upstream remediation frameworks are at an early stage, but stronger mapping and traceability lay the groundwork for targeted corrective action and remediation. As systems improve, brands will be better equipped to identify, address and co-manage human rights, environmental and animal welfare risks and impacts with supply chain partners.



Good practice and better practice actions

Based on research and OECD guidance, the table below highlights actions brands can take to strengthen visibility and due diligence in the leather supply chain.

✓ Good practice

✓ Better practice

1 Embed responsible business conduct into policies and management systems

- | | |
|--|--|
| <ul style="list-style-type: none"> ▶ Integrate supply chain mapping and traceability expectations into sustainability policies and sourcing contracts. ▶ Require supply chain partners (such as tanneries and slaughterhouses) to disclose country of origin and location identifiers for all raw hides. | <ul style="list-style-type: none"> ▶ Set and publish time-bound targets to achieve supply chain mapping and traceability to slaughterhouse and, where viable, farm. ▶ Consult with direct suppliers, tanneries, worker representatives, and specialist NGOs to ensure targets are realistic and achievable. ▶ Embed supply chain mapping and traceability requirements and progress into enterprise-wide risk and compliance systems with senior oversight. |
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2 Identify and assess actual or potential adverse impacts

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|--|---|
| <ul style="list-style-type: none"> ▶ In partnership with direct suppliers, map all tanneries used in leather production. ▶ In partnership with direct suppliers and tanneries, implement a standardised mapping survey (e.g. LWG questionnaire) to capture slaughterhouse location data. | <ul style="list-style-type: none"> ▶ Pilot risk-based third-party verification to strengthen confidence in mapping data (e.g. document verification, site audits, or isotope and DNA-testing). ▶ Pilot farm-level traceability using transaction-mapping tools to test feasibility. Partner with direct suppliers, tanneries, worker representatives, local communities, and specialist NGOs to ensure mapping tools reflect local realities. |
|--|---|

3 Cease, prevent or mitigate adverse impacts

- | | |
|---|---|
| <ul style="list-style-type: none"> ▶ Provide training support to supply chain partners to improve accuracy and consistency of mapping data. ▶ Invest in a digital traceability solution to support scalable mapping and traceability across the leather supply chain and to support systematic identification of gaps. Select a traceability solution that is open, accessible and compatible with other systems to reduce reporting burden on suppliers. | <ul style="list-style-type: none"> ▶ Pilot CoC certification in high-risk regions or to substantiate on-product country of origin or farm-level claims. ▶ Co-fund initiatives (e.g. Deforestation-Free Leather Fund) to scale advanced traceability/CoC solutions across the industry, including upstream at farm level. ▶ Co-design training programmes with direct suppliers, tanneries, worker representatives, and specialist NGOs, that address barriers to accurate data capture, particularly in high-risk regions. |
|---|---|

4 Track implementation and results

- | | |
|--|--|
| <ul style="list-style-type: none"> ▶ Track and report on supply chain mapping and traceability progress using mapping data and digital traceability solutions, product-life-cycle management and digital platforms where available. | <ul style="list-style-type: none"> ▶ Commission third-party assurance to validate reported data. ▶ Monitor the progress of co-funded solutions in partnership with direct suppliers, tanneries, worker representatives, and specialist NGOs. |
|--|--|

5 Communicate how impacts are addressed

- | | |
|--|--|
| <ul style="list-style-type: none"> ▶ Publish a summary of progress on supply chain mapping and traceability in annual sustainability reports and related disclosures (e.g. % mapped, compliance rates). | <ul style="list-style-type: none"> ▶ Publish a detailed summary of progress on supply chain mapping and traceability in annual sustainability reports and related disclosures (e.g. % volume by country of origin, % by supply chain tier). ▶ Share regular updates with direct suppliers, tanneries, trade unions or worker representatives, and specialist NGOs to enhance credibility and trust. ▶ Report on progress and outcomes of co-funded traceability solutions and partnerships. |
|--|--|

6 Provide for or cooperate in remediation

- | | |
|--|--|
| <ul style="list-style-type: none"> ▶ When a grievance or audit flags potential remediation, use supply chain mapping and traceability data to instantly identify if the brand's supply chain partners have caused or contributed to the impact and if action is required. | <ul style="list-style-type: none"> ▶ Where remediation is required, require suppliers to upload evidence of corrective action plans (CAPs) into the brand's digital traceability solution to support systematic close-out of issues. Share updates with impacted rightsholders. |
|--|--|





Due diligence in leather manufacturing

The leather manufacturing process

Understanding the leather manufacturing process is essential for identifying where the most significant risks may arise. Tanneries turn raw hides into leather through stages including soaking, unhairing, and tanning. These steps may take place within a single integrated tannery or be divided across specialised facilities. For example:

- ▶ Wet-blue tanneries preserve hides using chrome tanning, which gives the hides a blue colour while keeping them soft and wet.
- ▶ Crust tanneries dry and re-tan the leather for strength.
- ▶ Finishing tanneries apply colour, softness, and protective coatings.

The tanning industry includes both large and small-to-medium enterprises. Smaller tanneries may employ fewer than ten workers,²⁷ often combining traditional methods with some automation. Larger industrial tanners operate across multiple sites, employ thousands of workers, and rely on automated systems to manage high volumes efficiently. Workforces are predominantly male in many regions due to cultural norms surrounding physically demanding work, though gender balance tends to be greater in countries with stronger equity policies and higher automation. Typical stages in the leather manufacturing process include:²⁸

- ▶ **Beamhouse operations:** Soaking removes dirt and rehydrate hides. Liming with lime and sulphides removes hair, fats, and unwanted proteins. Fleshing removes excess tissue and splitting adjusts thickness.
- ▶ **Tanning:** Stabilises collagen fibres to prevent decomposition. The most common method is chrome tanning, which uses chromium salts for durability and flexibility. Alternatives include vegetable tanning (plant tannins, firmer leather, and aldehyde) or synthetic tanning (phenolic syntans, aromatic sulfonic acid syntans).
- ▶ **Post-tanning (wet finishing):** Neutralisation removes excess chemicals, followed by re-tanning to improve properties. Dyeing ensures colour uniformity, while fat liquoring restores softness and flexibility.
- ▶ **Drying and finishing:** Drying methods include toggle, vacuum, or air drying. The leather is then buffed, embossed, or coated for aesthetics and performance.
- ▶ **Final grading and dispatch:** The finished leather is graded for thickness, softness, and surface quality before dispatch to footwear, garment, upholstery, and accessory markets.

Salient risks

Leather manufacturing can be associated with both human rights and environmental risks. Severity and likelihood depend on management practices, local approaches, and the strength of regulation and enforcement in producing countries. With effective due diligence and responsible management, many risks can be prevented or mitigated.

The sections below highlight the most frequently reported salient risks in public sources, illustrated with country-specific examples from the leather supply chain. OECD guidance and the UNGPs emphasise that brands should go beyond desktop assessments by engaging directly with tanneries, workers, rightsholders, and other stakeholders to build a more nuanced understanding of country- and site-specific realities.

Human rights risks²⁹

- ▶ **Occupational health and safety:** Like other heavy industries, tanneries can be high-risk operations due to heavy machinery, manual handling, and hazardous chemicals. For example, workers can suffer chemical burns, respiratory illness and skin disorders. However, protective measures and careful management will reduce or eliminate such risks. In Bangladesh, weak enforcement of safety standards has led to frequent accidents, chemical exposure and chronic health problems.³⁰
- ▶ **Low wages and precarious employment:** Tannery workers in many countries are hired on informal or day-labour contracts that pay below living-wage levels and provide limited social protections. In Ethiopia, studies show tannery wages are among the lowest globally, covering only a fraction of household needs.³¹
- ▶ **Child labour:** In some countries, children have been found handling raw hides and hazardous chemicals in tanneries. Investigations in Bangladesh, revealed children exposed to toxins, burns, and respiratory risks while engaged in tanning operations.³²
- ▶ **Forced labour:** Coercive conditions such as withheld wages, document confiscation, or debt bondage limits workers' freedom to leave. In India, studies have found tannery workers trapped in bonded arrangements that amount to forced labour.³³
- ▶ **Community health and environmental impacts:** Poor waste management can pollute air, land, and water, harming surrounding communities. In some producing countries, affected residents report a lack of meaningful consultation or remediation.³⁴ In China, weak controls on tannery sludge and effluent disposal have been linked to elevated local disease rates and long-term ecological damage.³⁵
- ▶ **Freedom of association and collective bargaining:** In many producing countries, organising and collective bargaining are restricted by weak labour law enforcement, informality, and employer resistance. In Pakistan's leather sector, research shows union coverage remains very low, leaving most workers without representation to secure fair pay or safer conditions.³⁶
- ▶ **Gender inequality:** In many leather-producing countries, women are concentrated in low-paid, insecure jobs and excluded from technical or leadership roles. In India's tanneries, research shows women working mainly in finishing tasks, face wage discrimination, harassment, and limited opportunities for advancement.³⁷

Environmental risks³⁸

- ▶ **Hazardous chemicals:** Leather production uses hazardous substances such as chromium salts, formaldehyde and azo dyes, however, these can be managed safely with strong controls. In some countries, however, such as Bangladesh, weak waste treatment and enforcement have left tannery zones heavily contaminated, with chromium pollution threatening soil, groundwater, and community health.³⁹
- ▶ **Water consumption and pollution:** Processing is highly water-intensive and generates effluent that can be managed safely with proper treatment. In some countries, however, weak controls have led to severe ecological harm. In Tamil Nadu, India, studies and court rulings found tannery discharges caused irreversible damage to water and farmland.⁴⁰
- ▶ **Air emissions and toxic exposure:** Tanneries can release airborne pollutants such as hydrogen sulphide, ammonia and volatile organic compounds, along with buffing dust, which degrade air quality and harm respiratory health if controls are weak. In Pakistan, for example, residents near tannery zones have reported persistent odours and elevated rates of respiratory illness.⁴¹
- ▶ **Solid waste:** Fleshings, trimmings, shavings and chemically loaded sludge accumulate rapidly in leather production and can leach toxins if not properly managed. In Brazil, studies estimate tanneries generate hundreds of tonnes of solid waste daily, much of it landfilled, raising long-term risks of chromium contamination to soils and groundwater.⁴²
- ▶ **Energy use and carbon emissions:** Leather processing is energy-intensive, particularly drying and wastewater treatment. In countries dependent on fossil fuel-derived energy grids, such as India,⁴³ this can contribute significantly to greenhouse gas emissions and climate impacts.

Meaningful stakeholder engagement

Many business and human rights initiatives have relied on top-down approaches that sideline rightsholders, reducing effectiveness and creating blind spots across supply chains. Meaningful stakeholder engagement (MSE) addresses this by prioritising genuine, two-way dialogue on salient human rights issues and ensuring that conversations translate into action. MSE is integral to every stage of HREDD – from identifying and prioritising risks to prevention, mitigation and remediation. Key stakeholders include rightsholders – such as workers and affected community members – their legitimate representatives (trade unions, community leaders, NGOs), business partners (suppliers, service providers), and government bodies. Engagement takes various forms, including collecting human rights information, consultation, collaboration, dialogue, and negotiation. When getting started on HREDD, whether focused on the leather supply chain, or more generally, ensuring that you are mapping and engaging meaningfully with key stakeholders and rightsholders across your supply chain will increase the effectiveness of your HREDD. The importance of MSE has been recognised by legislators and is included in the forthcoming EEU CSDDD as a key requirement of HREDD.

In partnership with six organisations within the [STITCH consortium](#), ETI has developed the [Meaningful Stakeholder Engagement Framework](#). This framework is designed to be relevant across all sectors and provides key principles that underpin what makes engagement meaningful.

Addressing impacts — Current brand practices

Based on an assessment of brand disclosures and stakeholder consultations, this section summarises current brand due diligence practices in leather manufacturing and their alignment with OECD guidance.

1 Embed responsible business conduct into policies and management systems

Environmental risks posed by leather manufacturing are typically addressed through corporate sustainability policies and principles, sometimes with specific strategies for chemicals, water, wastewater, and GHG emissions. Chemicals management typically requires suppliers and tanneries to comply with publicly restricted substances lists (RSLs) and manufacturing RSLs, reinforced in some cases by explicit, time-bound compliance targets. These requirements are embedded in supplier contracts, procurement rules and sustainability frameworks to ensure enforceability and clear accountability.

Human rights risks are generally addressed through human rights policies, ethical sourcing codes, or supplier codes of conduct. However, only about one-third of brands extend these codes to tier 2 suppliers, including tanneries. Public targets that specifically reference tanneries are rare, meaning human rights obligations often lack the focus and contractual force given to environmental requirements.

2 Identify and assess actual or potential adverse impacts

Most brands have visibility of their networks and often nominate tanneries to strengthen traceability, quality management, and risk mitigation. To operationalise their policies and assess leather-manufacturing risks, they rely primarily on audits governed by the LWG or similar third-party schemes.⁴⁴ Founded in 2005, LWG is a global, not-for-profit multi-stakeholder initiative that promotes responsible leather production. The organisation today has over 600 brand members and certifies over 2,000 tanneries across more than 60 countries, covering roughly 30% of global leather production.⁴⁵ Its flagship environmental audit is evolving into the LWG Leather Production Standard, which sets minimum thresholds, good practice criteria and guidance for environmental management, with tanneries rated Gold, Silver, Bronze or Audited.

Social compliance assessments — aimed at identifying and evaluating human rights risks — in contrast, are inconsistent. Where brands mandate social compliance audits, these typically follow the same standards used for direct suppliers and tier 1 factories — such as [SMETA](#), [FSLM](#) and [WRAP](#). Although social criteria were introduced into LWG's audit in 2021, a credible third-party social compliance audit is not yet a mandatory score criterion. The forthcoming LWG Leather Production Standard is reviewing this topic, and an update is expected in 2026.

Beyond audits, brand-driven initiatives that emphasise social dialogue, worker empowerment, gender-sensitive perspectives, and just transition — commonly in tier 1 supply chains — remain rare in leather manufacturing. Reliance on audits to identify and assess impacts risks blind spots in risk identification, leaving critical human rights issues unexamined, excluding workers from meaningful participation and creating a false perception of human rights compliance, that may not reflect reality.

3 Cease, prevent or mitigate adverse impacts

Brands generally encourage continuous improvement in environmental audit ratings (e.g. moving from Bronze to Silver to Gold under LWG). Acknowledging that audits are just one of several tools, brands are increasingly going beyond compliance to prevent and mitigate adverse environmental impacts, for example by:

- ▶ Providing targeted training to address impacts, sometimes delivered by third-party providers.
- ▶ Supporting tanneries to share detailed environmental data and set reduction targets, often aligned with climate, nature, or science-based targets (SBTs).
- ▶ Promoting good practice in wastewater management, in alignment with zero discharge of hazardous chemicals (ZDHC), wastewater guidelines or equivalent.
- ▶ Incentivising investment in innovation, such as water-saving technologies, lightweight leather, and circularity-oriented processes like metal free (chrome free) tanning.

Where brands extend social compliance to tanneries, CAPs are used to address gaps in human rights and labour standards, sometimes with brand support to strengthen compliance. However, broader brand-led collaborations aimed at addressing systemic human rights issues in leather manufacturing remain uncommon. Donor-funded and industry initiatives in countries such as Bangladesh and Pakistan offer potential learning for brands seeking to understand and engage with the sector.⁴⁶

4 Track implementation and results

Continuous improvement in environmental performance is tracked through periodic re audits. Some brands are also working with tannery partners to capture and report more granular data, which feeds into internal dashboards or third-party platforms and supports brand public commitments such as Scope 3 GHG reduction.

Human rights performance tracking is limited to brands that explicitly include tanneries in their social compliance framework. In those cases, and in-line with the approach taken with tier 1 suppliers and factories, tannery performance is tracked through periodic re-audits, with higher frequency where serious violations are identified).

5 Communicate how impacts are addressed

Brands maintain transparency by publicly disclosing their due diligence policies, supplier audit requirements and aggregate compliance figures, such as the percentage of leather volumes sourced from LWG certified Silver/Gold rated tanneries, and by reporting year-on-year improvements. These metrics are included in annual sustainability reports and related voluntary and mandatory disclosures.

Where social audits are in scope, human rights outcomes are typically reported in aggregate. In a few good practice examples, brands have provided disaggregated human rights data at tannery level – summarising the percentage of suppliers audited for labour standards, and the number and type of violations or grievances addressed. However, this is not the norm, underscoring the need for more granular and consistent human rights disclosures alongside environmental data.

6 Provide for or cooperate in remediation of adverse impacts

When environmental violations occur, suppliers must implement CAPs with root cause analysis and timelines according to government or other official bodies. Brands also operate grievance mechanisms – such as hotlines or third-party platforms – that apply across their supply chains and cover both environmental and human rights issues.

Social compliance follows a similar model: human rights-related violations or grievances, under some schemes, trigger CAPs and progress reports. On issues such as child labour and forced labour, some brands have also developed and published detailed remediation policies and processes that apply to their full supply chain.



Good practice and better practice actions

The following actions are suggested for brands seeking to strengthen human rights and environmental standards at tanneries in their supply chains.

▼ Good practice

▼ Better practice

1 Embed responsible business conduct into policies and management systems

Human rights:

- ▶ Explicitly reference requirements for tier 2, including tanneries, in human rights policies or ethical sourcing codes. Incorporate requirements for tanneries into direct supplier contracts to reinforce contractual accountability.

Environment:

- ▶ Establish relevant environment policies, such as chemicals policy encompassing RSL and MRSL requirements, and embed these into direct supplier contracts.

Human rights:

- ▶ Co-develop policies and codes with tannery representatives, worker representatives, and specialist NGOs to reflect local realities. Identify challenges and determine what support and commitments are needed from the brand to enable effective implementation. Consider additional requirements, such as gender-disaggregated data and OHS risk assessments, to support a more systematic approach.

- ▶ Set public, time-bound targets for tannery partners to achieve compliance with policies and requirements.

Environment:

- ▶ Set public, time-bound targets for tannery partners to achieve compliance with policies and requirements.

2 Identify and assess actual or potential adverse impacts

Human rights:

- ▶ Encourage tanneries to establish social dialogue processes and worker representative structures, and promote freedom of association, to empower workers and support joint identification of root causes and solutions to human rights risks.
- ▶ Require all tanneries, at least those located in countries assessed as high-risk, to undergo credible third-party social compliance audit, or share existing audit results, at least every 24 months.
- ▶ Review and score audit reports centrally, flagging any violations and assign them to a risk register.

Environment:

- ▶ Require each tannery to undergo an LWG audit or equivalent, and to share required actions for review.

Human rights:

- ▶ Augment third-party audits with worker-driven assessments (e.g. worker voice apps, surveys, interviews with worker representatives, worker-management committees) to capture worker at tannery level. Integrate risk data into a dashboard that triangulates results of audit and worker-driven assessments to strengthen overall risk assessments.
- ▶ Undertake meaningful stakeholder engagement processes with tannery representatives, trade unions, worker representatives, and specialist NGOs to build deeper understanding of systemic human rights risks and their causes.

Environment:

- ▶ For higher volume and higher risk tanneries, request periodic quantitative environmental data — such as GHG emissions, water, and wastewater discharge — to strengthen visibility and support hot spot analysis and deeper assessment of environmental risks.

3 Cease, prevent or mitigate adverse impacts

Human rights:

- ▶ For any social audit violations, require CAPs with root-cause analysis and corrective actions with specified timeframes in line with requirements for tier 1 factories.
- ▶ Provide targeted capacity building support for tannery partners, as required, to address critical violations. Collect worker feedback on improvements.
- ▶ Agree targets with tannery partners for year-on-year improvements social compliance audit score (e.g. orange, green).

Environment:

- ▶ Provide targeted training support for tannery partners, as required, to address serious environment impacts.
- ▶ Set expectations and targets for year-on-year improvements in LWG or equivalent audit scores.

Human rights:

- ▶ Co-invest in collaborative improvement projects with tannery partners, trade unions, worker representatives, and specialist NGOs — on salient risks such as OHS, gender equity, living wages.
- ▶ Offer preferential buying terms (e.g. volume guarantees, or longer-term contracts) to tanneries that demonstrate continuous improvement and/or demonstrate strong commitment to OHS, freedom of association, gender equality or living wages.

Environment:

- ▶ For higher volume tanneries, encourage ambitious environment targets — preferably aligned with the Science Based Targets initiative (SBTi) — and work towards year-on-year reductions.
- ▶ Co-invest in collaborative environment improvement projects with tannery partners, such as upgrades to effluent treatment systems, water recycling, and leather reuse and recycling schemes.
- ▶ Offer preferential buying terms (e.g. volume guarantees, or longer-term contracts) to tanneries that demonstrate continuous improvement and/or achieve quantified targets.

4 Track implementation and results

Human rights:

- ▶ Monitor social audit CAP remediation and log the number and type of human rights violations, and grievances raised and closed per tannery in supplier management systems. Escalate overdue actions through procurement reviews with direct suppliers and tanneries.
- ▶ Mandate periodic re-audit of tanneries assessed as high-risk or with past violations.

Environment:

- ▶ Mandate periodic re-audit of tanneries and track improvements in overall audit scores.

Human rights:

- ▶ Augment CAP result follow-up actions with worker feedback to validate the effectiveness of corrective actions and interventions (e.g. via worker voice apps, interviews with trade union representatives, surveys, worker-management committees) Track and validate outcomes of cross-sector projects on salient risks (e.g. OHS, gender equity, living wage, just transition) in partnership with tannery representatives, trade unions, workers, and NGOs.

Environment:

- ▶ For higher volume and higher risk tanneries, track year-on-year environmental data and agreed targets centrally — such as GHG emissions, water, and wastewater discharge — to strengthen visibility and assess effectiveness of interventions and alignment with brand public commitments.

5 Communicate how impacts are addressed

Human rights:

- ▶ Report the share of tanneries with established social dialogue processes, worker representative structures, and those with collective bargaining agreements. Report the share of tanneries covered by social audits, uptake of grievance mechanisms, and aggregated statistics on numbers of violations and resolved cases in annual sustainability reports and related public disclosures.

Environment:

- ▶ Disclose the percentage of leather volumes sourced from LWG-certified or equivalent tanneries in annual sustainability report and related disclosures, and comment on year-on-year improvements in key KPIs.

Human rights:

- ▶ Report on the progress and outcomes of cross-sector improvement projects – on salient risks such as OHS, gender equity, living wage, and just transition.
- ▶ Validate public reporting with input from worker representatives, trade unions, and specialist NGOs to ensure accuracy and credibility.

Environment:

- ▶ Publish disaggregated environmental data – such as GHG emissions, water, and wastewater discharge – showing the contribution of tanneries toward brand public environments target and year-on-year improvements.

6 Provide for or cooperate in remediation of adverse impacts

Human rights:

- ▶ Establish a basic remediation policy and process aligned with human rights and ethical sourcing codes.
- ▶ For every human rights violation, mandate a documented CAP with worker involvement in root-cause analysis, track progress in a central database.

Environment:

- ▶ Establish an environmental remediation policy and process aligned with company environmental policies and due diligence standards.
- ▶ For every serious environmental impact, mandate a root-cause analysis, engage relevant stakeholders where appropriate, and track corrective and preventive actions in a central database.

Human rights:

- ▶ Develop and implement grievance mechanisms for tannery workers and communities in consultation with tannery partners, trade unions, worker representatives, and specialist NGOs. Ensure mechanisms meet UNGP effectiveness criteria and enable safe, confidential access to remedy.
- ▶ Develop a detailed policy and process on remediation in consultation with tannery partners, trade unions, worker representatives and specialist NGOs that fully aligns with international standards (e.g. UNGPs). This should include mechanisms for compensation where brand actions have contributed to adverse impacts.
- ▶ Collaborate with tannery partners, trade unions, worker representatives and specialist NGOs on remediation projects where adverse impacts have been identified.

Environment:

- ▶ Develop detailed policy and process on environmental remediation in consultation tannery partners, worker representatives, local community, and specialist NGOs, that aligns with international standards and good practice (e.g., OECD Guidelines, UNGPs, IFC Performance Standards). This should include mechanisms for compensation where actions by the brand have contributed to adverse environmental impacts.

Case study: adidas — Working toward respect for human rights across the leather supply chain

adidas is one of the world's leading sportswear brands, with a long-term commitment to embed respect for human rights across its operations and value chain. Although leather makes up only around 5% of adidas's materials portfolio, the sector's complex human rights, environmental, and animal welfare risks have made it an important focus of its due diligence efforts. Over time, the company has deepened its insight into these risks at every stage of the leather supply chain — from manufacturing, to slaughter, to farm — with the aim of driving meaningful, lasting improvements.

adidas' human rights and environmental due diligence framework

adidas' HREDD framework draws on 25 years of stakeholder engagement to identify, assess, and remediate risks across its global operations and value chain. At its core are long-standing business and supplier partnerships — many lasting over a decade — and an understanding that achieving long-term improvements in working conditions and respect for human rights requires shared responsibility and action. The business takes a data-driven, risk-based approach to due diligence:

- ▶ **Identifying high-risk areas:** Assessing risks based on geography, including country-specific labour laws and regulatory environments; factory-level working conditions; and insights gained from stakeholder engagement, including with NGOs and local communities.
- ▶ **Prioritising action:** Preventing, mitigating and remediating impacts by strengthening policies and supplier contracts in high-risk areas, conducting regular audits and impact assessments, supporting workers through grievance mechanisms and training, and taking swift intervention when violations are found.
- ▶ **Supporting at-risk rightsholders and communities:** Protecting at-risk communities — including migrant workers, women, and Indigenous Peoples — by ensuring that suppliers uphold fair treatment for all workers, provide access to grievance mechanisms, and collaborating with NGOs to drive systemic change.



A cornerstone of adidas's HREDD framework is its human rights policy, which codifies expectations for employees and business partners in line with UNGP and ILO core conventions. This policy is reinforced by complementary standards and policies, including:

- ▶ **Workplace standards:** Establishes mandatory requirements for partner suppliers and factories — such as prohibiting forced and child labour and defining minimum wages, benefits, and compensation.
- ▶ **Responsible sourcing and purchasing policy:** Defines buying and sourcing expectations for all internal business units — such as payment terms and costing frameworks — to reinforce the objectives of the workplace standards.

All business partners and rightsholders can seek remedy through adidas's third-party complaint procedure for human rights and environmental impacts.

Beyond its core policies and standards, adidas invests in social dialogue, women's equality, and worker voice initiatives with its direct (tier 1) suppliers and factories to broaden its positive social impact and tackle systemic industry challenges.

Addressing human rights risk in leather manufacturing

Within this framework, leather supply chain due diligence focuses on identifying human rights and deforestation risks in manufacturing (tanneries) and upstream raw materials (slaughter to farm). adidas's leather supply chain encompasses tanneries worldwide, with approximately three-quarters of these facilities nominated. Like tier 1 suppliers, many of these tanneries are long-term business partners that have been supplying leather for adidas products for over a decade.

In line with its risk-based HREDD framework, adidas evaluates tanneries on two principal dimensions. First, it categorises facilities by country-level risk, prioritising regions with weaker labour laws, limited enforcement or a history of human rights violations. Second, it considers business volume and leverage, concentrating social compliance monitoring on those suppliers that represent roughly 80 per cent of adidas's total leather purchases.

Most in-scope tanneries are assessed by a third-party audit firm authorised by the adidas social and environmental affairs (SEA) team, using standards aligned with adidas's workplace standards. To minimise duplication of effort and audit fatigue, adidas also accepts equivalent audit reports from schemes such as the [Social & Labour Convergence Programme](#) (SLCP) and the [ILO/IFC Better Work](#) initiative. The SEA team and external providers track agreed corrective actions to ensure prompt remediation. Targeted training is provided, as required, to support continuous improvement in working conditions.

Building on this tannery-level engagement, adidas sees potential for new industry partnerships that leverage lessons from the apparel and footwear sectors to address systemic human rights issues in leather manufacturing; for example, by strengthening social dialogue, amplifying workers' voices, and promoting gender equality.

Addressing human rights and deforestation risks from slaughter to farm

Driven by modern slavery concerns, mandatory reporting and regulations such as Germany's [Supply Chain Due Diligence Act](#), adidas has over the past decade extended its human rights due diligence upstream into raw material sourcing, including leather. At the same time, the company recognised its exposure to significant environmental risks — notably deforestation and land conversion — associated with the meat and leather supply chain and livestock production in countries such as Brazil and Argentina.

In response to these risks, in 2023, adidas joined the [Deforestation-Free Call to Action on Leather](#) and committed to achieving a fully deforestation- and conversion-free (DCF) bovine leather supply chain by 2030. To support this goal, the company launched a supply chain mapping initiative to trace sourcing from tanneries back to slaughterhouses and assess deforestation-related risks. Working in partnership with its tanneries, the project has provided visibility into 98% of the slaughterhouses supplying its bovine leather, and, in some cases, down to the individual farm. When combined with geospatial analysis using satellite imagery, the initiative has enabled adidas to pinpoint deforestation risk zones with far greater accuracy. The supply chain mapping exercise will be repeated in 2025 to ensure up-to-date information is available.

However, assessing and mitigating human rights risks at slaughterhouses and farms remains challenging due to limited site-level data and limited leverage, considering these tiers of the leather supply chain fall under the meatpacking sector.

Looking ahead: biodiversity & ecosystems policy and deepening partnerships

Building on these initiatives, and to reinforce its environmental commitments and uphold human rights, adidas has recently published a biodiversity and ecosystems policy with objectives to conserve biodiversity, restore ecosystems, and protect the rights and livelihoods of local communities and Indigenous Peoples. To achieve these objectives the business recognises that partnership with the leather and meat industry, rightsholders and other stakeholders will be critical. Future areas of collaboration could include sharing of data and certifications, human rights impact assessments, and joint initiatives to strengthen worker voice and social protections.



Case study: Green Social Dialogue – Supporting a just transition in Bangladesh

Introducing environmentally friendly production modes can have mixed and sometimes counterproductive impacts on workers. These impacts can be economic, social, and psychological, and they often depend on how the transition is managed. A just transition refers to the shift toward a low-carbon economy that is fair, inclusive, and protects workers' rights and livelihoods. It emphasises worker participation, social protection, and access to reskilling, ensuring climate action upholds human rights and does not marginalise communities. This is especially critical in sectors like textiles and leather, where workers are disproportionately affected by decarbonisation efforts.

Bangladesh is the world's second-largest exporter of ready-made garments (RMG), employing over 4 million workers, most of them women. A just transition is vital as the country faces rising sea levels, extreme weather, pollution, and significant disruption from automation, digitalisation, and low-carbon technologies. In response, [ETI Bangladesh](#), in partnership with [Ethical Trade Norway](#), launched the [Green social dialogue](#) (GSD) programme in July 2022. Focused on the RMG sector, the programme integrates climate awareness and action into existing workplace dialogue structures between factory management and workers.

To date, the GSD programme has been piloted in five RMG factories, with over 300 management and worker representatives trained, and more than 10,000 workers reached through awareness initiatives. It has delivered baseline environmental assessments, training sessions, and communication tools to help workers engage with issues such as carbon emissions, waste, and resource use. Rather than treating climate action as a top-down or purely technical issue, the programme fosters collaborative problem-solving and mutual understanding at factory-level.

The pilot GSD programme has delivered strong, measurable results including:

- ▶ Five factories adopted formal sustainability action plans
- ▶ One factory installed a 40KW solar array, now supplying 7% of its energy needs
- ▶ One factory now recycles 50% of its treated water
- ▶ One factory cut water use by 13%
- ▶ One factory now reuses 5300kg of polythene each month.

The GSD model holds clear relevance for tanneries in Bangladesh and beyond. While climate awareness and environmental management in the leather sector are still developing, tanneries face mounting pressure to reduce emissions and ensure effluents are effectively treated. A social dialogue approach like GSD could help build worker trust and support a more inclusive and effective transition to cleaner and greener practices.

Gender

Gender sensitivity — recognising and addressing the different needs, experiences, and barriers faced by workers of different genders — is a fundamental aspect of responsible business conduct. It is central to promoting equality, reducing discrimination, and ensuring that all workers can enjoy safe, fair, and dignified conditions.

In supply chains around the world, women often face lower pay, limited access to training, unsafe working conditions, and underrepresentation in decision-making roles. Understanding and acting on these gender-specific risks is essential for creating fair and resilient workplaces. Collecting gender-disaggregated data — such as information on workforce composition, wages, overtime, promotions, and access to grievance mechanisms — allows companies to identify where inequalities exist and take targeted action. Initiatives such as ETI's Gender Data Initiative support company members in developing the skills and systems needed to collect, analyse, and use this data effectively.

When companies integrate gender-sensitive approaches into human rights due diligence, they are better able to address barriers to equality. This includes practical steps such as improving access to training for women, ensuring fair recruitment and promotion practices, supporting flexible working arrangements, and strengthening grievance mechanisms to address harassment or discrimination.

Businesses that proactively promote gender equality benefit from a more engaged and productive workforce. Forward-looking companies recognise that gender equality is not just a compliance requirement or ethical responsibility. It is a strategic approach to workforce engagement, risk management, and long-term sustainability.

For more information and guidance on implementing gender-sensitive practices, including ETI's Gender Data Initiative and related tools, please refer to ETI's [Gender Data Initiative](#).





Due diligence in animal slaughter

The slaughter process

Slaughterhouses supply raw hides and skins for global leather production. In 2022, global bovine hide production alone reached approximately 8.7 million tonnes, with China, the USA, Brazil and India the largest producers.⁴⁷

Slaughterhouses vary significantly in scale. Large, multinational meat processors operate industrial facilities employing thousands of workers, with formal oversight and mechanised processes, particularly in countries like Brazil, the USA, and Australia. In contrast, smaller, informal slaughterhouses are more common in South Asian countries and parts of sub-Saharan Africa. In some countries, slaughtering can occur at household or community level, particularly during religious festivals, such as Eid-al-Adhar.

The sector is predominately male, with men concentrated in slaughter and technical roles. Women are usually employed in support tasks such as cleaning, packing, or administration.

The slaughter process⁴⁸ involves several critical steps that transform a live animal into a meat product and its by-products. The following steps are typical for livestock used in leather production:

- ▶ **Stunning:** Animals are rendered unconscious using electrical, mechanical, or gas methods to minimise pain and distress. Stunning is not required in all countries due to cultural or religious beliefs.
- ▶ **Bleeding:** Major blood vessels are cut to ensure rapid blood loss, prevent recovery of consciousness and reduce contamination risks.
- ▶ **Skinning/hide removal:** Hides or skins are carefully removed post-bleeding to preserve integrity and quality. Mechanical or manual flaying must avoid cuts, holes, or contamination.
- ▶ **Evisceration:** Internal organs are removed while the carcass is suspended. This process must avoid contact with the hide to prevent bacterial or fecal contamination.
- ▶ **Washing and chilling:** Carcasses are cleaned and cooled to preserve meat safety. Hides are typically trimmed, graded, salted, and stored in cool conditions to prevent spoilage before transport to tanneries.

Salient risks

The slaughter process creates a range of human rights, environmental, and animal welfare-related risks. Like leather manufacturing, the severity and likelihood of these risks will depend greatly on management practices, local customs, regulations and enforcement.

This section provides a summary of the most common risks highlighted in literature. Country and regional examples are provided where relevant to the leather industry supply chain. For a deeper exploration of individual risks, brands are encouraged to review the included references, as well as engage with meat industry stakeholders and rightsholders.

Human rights risks

- ▶ **Occupational health and safety:** Slaughterhouses are high-risk workplaces where fast production speeds, heavy machinery, and sharp tools expose workers to serious injuries, ergonomic strain, and psychological stress. In the USA, for example, research documents frequent accidents, pathogen exposure, and chronic health impacts among meat processing workers.⁴⁹
- ▶ **Child labour:** In unregulated or informal slaughter operations, children may be found performing hazardous tasks such as handling knives, lifting carcasses, or cleaning blood and offal. In India, investigations have revealed minors working in slaughterhouses where weak enforcement leaves them vulnerable to exploitation and harm.⁵⁰
- ▶ **Forced labour:** Migrant and vulnerable workers may face coercion through threats, withheld wages, or debt bondage, limiting their ability to leave exploitative jobs. In the USA, reports highlight migrant children and adults subjected to forced labour conditions in meat processing plants.⁵¹
- ▶ **Low wages and precarious employment:** In many producing countries, workers are employed on temporary or informal contracts, with long hours and pay below living wage levels. In Brazil, studies highlight low wages, repetitive injuries, and unsafe conditions linked to weak oversight.⁵²
- ▶ **Freedom of association and collective bargaining:** Workers face restrictions on forming unions or bargaining collectively, limiting their ability to secure safer conditions or fair wages. In the USA, research shows employer resistance and legal loopholes have undermined unionisation in large meat processing plants.⁵³
- ▶ **Community health and environmental impacts:** Poor management of slaughterhouse effluent, waste, and odour can cause air pollution, water contamination, and reduced quality of life for surrounding communities. In the USA, litigation and community campaigns have drawn attention to slaughterhouse pollution and its public health impacts.⁵⁴
- ▶ **Gender inequality:** Women are concentrated in low-paid, repetitive roles with limited advancement opportunities, and may face workplace harassment or discrimination. In Brazil, reports highlight systemic gender inequality in the sector, particularly affecting migrant women.⁵⁵

The importance of freedom of association and collective bargaining

Freedom of association (the right of workers to form or join organisations of their own choosing) and collective bargaining (the process through which workers and employers negotiate employment terms) are internationally recognised human rights. They are enshrined in the ILO's core conventions ([C087](#), [C098](#), [C154](#)) and form the foundation of [decent work](#).

In supply chains across the globe, where low pay, insecure work, and poor conditions are common, these rights are critical. Independent worker representation helps to rebalance power, supporting workers to challenge exploitation and advocate for fairer treatment. When workers are able to organise and bargain collectively, they are better positioned to improve wages, safety, working hours, and respect on the job — all of which contribute to more resilient and productive workplaces.

A workforce that has a say in how work is organised is more motivated, more productive, and less likely to leave. Research shows that unionised workplaces have [lower accident and injury rates](#), and are [more productive and competitive](#). Developing constructive working relationships between worker representatives and management enables workplaces to proactively address issues before they escalate. This builds trust, reduces risk, and is invariably more cost effective than waiting until after the event.

Companies that actively support worker representation and build constructive relationships with unions can benefit in tangible ways. In the context of purchasing practices, companies can support representation by prioritising sourcing from countries and suppliers that respect freedom of association and where wages are a product of collective bargaining through mechanisms that meet ILO standards. Forward-looking businesses recognise that respecting union rights is not just a legal obligation or a matter of ethical responsibility. It is a strategic approach to workforce engagement, risk management, and long-term sustainability.

For more information and useful multi-lingual resources on supporting and implementing freedom of association please refer to ETI's guidance document [Implementing freedom of association — a five step plan](#).



Animal welfare risks⁵⁶

- ▶ **Improper handling and restraint:** Rough handling, inadequate facilities, and lack of training can cause animals unnecessary stress, pain, and injury during unloading and stunning. In India, reports show that weak enforcement and poor infrastructure contribute to frequent animal welfare breaches.⁵⁷
- ▶ **Stunning and slaughter:** While stunning can reduce suffering, in some contexts, it is poorly applied or not legally required due to cultural, religious practices or regulatory gaps. In Pakistan, assessments reveal poor stunning techniques and equipment failures that compromise animal welfare.⁵⁸

Environmental risks⁵⁹

- ▶ **Water use and pollution:** Slaughterhouses require large volumes of water and generate effluents containing blood, fats, and pathogens, which can damage ecosystems when untreated. In India, studies document severe water contamination from slaughterhouse discharges affecting both communities and agriculture.⁶⁰
- ▶ **Solid waste:** Offal, bones, and sludge can contaminate soil and water if not properly rendered or disposed. In Pakistan, research highlights poor sanitary controls and widespread challenges in managing abattoir waste.⁶¹
- ▶ **Energy use and GHG emissions:** Slaughterhouses rely heavily on energy for refrigeration, cleaning, and wastewater treatment. In countries dependent on fossil fuel-derived energy grids, such as China,⁶² this can contribute significantly to greenhouse gas emissions and climate impacts.
- ▶ **Air emissions and odour:** Slaughterhouse operations release odours, ammonia, and volatile organic compounds that degrade air quality and affect neighbouring communities. In the USA, local campaigns and studies have reported persistent odour and pollution from meat processing plants.⁶³



Addressing impacts — Current brand practices

Based on an assessment of brand disclosures and stakeholder consultations, this section summarises current brand due diligence practices in animal slaughter and their alignment with OECD guidance.

1 Embed responsible business conduct into policies and management systems

Most brands are at very early stages of integrating slaughter house related risks into their policies. Corporate level animal welfare policies are the most common, typically referencing the [Five Freedoms](#) and requiring hides and skins to be sourced as by products of meat production. Some brands also impose sourcing restrictions, avoiding countries with weak regulation and enforcement.⁶⁴ However, with a few exceptions, human rights and environmental risks at slaughterhouses are rarely addressed in overarching policies.

2 Identify and assess actual or potential adverse impacts

Building on supply chain mapping data, some brands have begun using location based intelligence tools⁶⁵ to assess human rights and environmental risk exposure at country-level. Supported by tannery partners, some have gone further and conducted supplier surveys to gather basic information on site specific slaughterhouse operations, including workforce numbers, labour practices, environmental management and animal welfare. However, overall risk assessments remain in their infancy, with limited data and evidence to support effective risk mitigation strategies.

3 Cease, prevent or mitigate adverse impacts

Where visibility and leverage are low, some brands are choosing to disengage from high-risk regions. Animal welfare is one area where a limited number of brands have acted, introducing requirements for humane handling and stunning aligned with EU standards⁶⁶ and implemented through tannery partners via documentation or certification.⁶⁷ Others are partnering with meat processors and retailers to share data and consider collaborative approaches. The meat and livestock sector brings extensive experience and existing initiatives⁶⁸ from farm to slaughter, with the commercial relationships and influence to drive improvements.

4 Track implementation and results

Monitoring remains limited, with few brands having mechanisms to consistently track compliance with slaughter house level requirements. A small number of brands are utilising third-party certification schemes, or audits completed by meat processors, to monitor compliance with animal welfare requirements.

5 Communicate how impacts are addressed

Brand disclosures are extremely limited. Most public reporting focuses on high level animal welfare commitments and sourcing policies, with no available information on site level improvements.

6 Provide for or cooperate in remediation

Remediation is not yet a focus, given the sector's complexity and brand leverage constraints. Where brand impacts are identified, effective remedies will require close collaboration with meat industry actors, trade unions and worker representatives.

Good practice and better practice actions

The following actions are suggested for brands seeking to strengthen human rights, animal welfare, and environmental due diligence at slaughterhouses.

✓ Good practice

✓ Better practice

1 Embed responsible business conduct into policies and management systems

- ▶ Recognise slaughterhouse-related risks within broader human rights, environmental, and animal welfare-related policies.

- ▶ Integrate specific requirements for slaughterhouses within broader human rights, environmental, and animal welfare-related policies and standards (e.g. humane stunning) and share these expectations with tannery partners.

2 Identify and assess actual or potential adverse impacts

- ▶ Use intelligence tools and risk indices to map country-level risks.
- ▶ Where slaughterhouses are owned by larger meat processors (or vertically integrated operations), conduct desktop research to assess the strength of existing published policies and compliance procedures.
- ▶ Where feasible, conduct supplier surveys cascaded by tannery partners to form a basic understanding of human rights, environmental, and animal welfare-related conditions at slaughterhouse operations.

- ▶ Where tanneries have strong relationships with slaughterhouses, or hides come from a tannery that is owned by a meat processor (i.e. vertically integrated), gather more nuanced site-level risk intelligence, including where available, third-party social and environmental compliance reports.
- ▶ Collaborate with meat industry stakeholders, trade unions, worker representatives, and specialist NGOs on research projects aimed at developing a deeper understanding of slaughterhouse-specific human rights and environmental risks.

3 Cease, prevent or mitigate adverse impacts

- ▶ Partner with tannery and meat industry stakeholders on pilot projects to address adverse human rights, animal welfare, and environmental impacts at site-level.

- ▶ Where tanneries have strong relationships with slaughterhouses, request existing human rights, environmental, and animal welfare-related certifications where available (e.g. [Certified Humane](#), [Global Animal Partnership](#) or [RSPCA Assured](#))
- ▶ Collaborate with meat industry stakeholders, trade unions, worker representatives, and specialist NGOs on social dialogue initiatives aimed at achieving systemic change at a national-level, including research and government advocacy.

4 Track implementation and results

▶ Review the effectiveness of pilot projects, including the potential to scale up.

▶ Where tanneries have strong relationships with slaughterhouses, periodically request and review the status of CAPs and, where available, ensure certifications remain up-to-date.

▶ Review the effectiveness of national social dialogue initiatives, including the potential to expand initiatives into other countries where relevant.

5 Communicate how impacts are addressed

▶ Publish regular updates on pilot projects and partnerships in sustainability reports and related disclosures.

▶ Publish policies and standards integrating specific requirements for slaughterhouses (e.g. humane stunning)

▶ Publish regular updates on the progress and outcomes of national-level social dialogue projects in sustainability reports and related disclosures.

6 Provide for or cooperate in remediation

▶ Assess existing remediation policies and procedures of meat processors mapped to the supply chain.

▶ Where an adverse impact has occurred at a slaughterhouse that a brand has mapped to its supply chain, engage with tannery partners relevant meat processors, trade unions and worker representatives to assess the effectiveness of existing remediation and, if required, the potential for shared action.



Due diligence in livestock production

The role of livestock production in leather production

Livestock rearing is the primary source of hides and skins used in the tanning industry. The sector is highly diverse, encompassing smallholder farms, pastoral systems, and large-scale industrial operations. The quality and characteristics of leather are influenced by farming conditions, including animal health, breeding methods, feed quality, and exposure to parasites or scarring.

Salient risks

Like the leather manufacturing and slaughter, livestock production is exposed to human rights, environmental and animal welfare risks, the severity and likelihood of which vary greatly across regions depending on farming systems, cultural practices, regulations and enforcement.

This section summarizes the most salient risks covered in literature. Country and regional examples are provided where relevant to the leather industry supply chain. For a deeper exploration of individual risks, brands are encouraged to review the included references, as well as meaningfully engage with livestock industry stakeholders and farm-level rightsholders.

Human rights risks

- ▶ **Child labour:** Children are engaged in herding and animal care in some countries, exposing them to long hours, hazards, and loss of schooling. Documented in India, where poverty and limited education opportunities leave children vulnerable to exploitation and harm in rural livestock-keeping households.⁶⁹
- ▶ **Forced labour:** Livestock supply chains in some regions face risks of forced labour, particularly in informal or remote production areas with weak oversight. Workers may be coerced through debt, withheld wages, or threats, limiting their ability to leave. In Brazil, reports have linked cattle ranching to cases of forced labour.⁷⁰
- ▶ **Indigenous rights and land tenure:** Expansion of cattle pasture and feed crops has encroached on Indigenous territories, creating land conflicts and undermining traditional livelihoods. Weak land protections heighten these risks. In Brazil, ranching has driven deforestation and illegal occupation of Indigenous lands.⁷¹

- ▶ **Low wages and informal employment:** Livestock workers, including migrants and seasonal labourers, are often employed without contracts, social protections, or wages that meet basic living standards. Studies in Brazil have highlighted low pay, insecure work, and poor oversight as persistent challenges.⁷²
- ▶ **Occupational health and safety:** Livestock workers face risks of infectious diseases, handling animals injuries, and long-term physical strain. Where veterinary services or training are limited, these risks are more acute. In Pakistan, studies have documented exposure to zoonotic diseases and injuries among rural livestock workers, reflecting significant gaps in occupational health and safety.⁷³
- ▶ **Freedom of association and collective bargaining:** In many livestock sectors, legal exclusions or employer resistance restrict workers' rights to organise and bargain collectively. In the USA, research has shown how farmworkers are excluded from core labour protections.⁷⁴
- ▶ **Gender discrimination:** Women contribute significantly to livestock production, particularly in smallholder systems, but often lack equal access to resources, training, and decision-making. In India, reports highlight systemic gender inequality, where women remain excluded from land ownership and leadership, despite central roles in animal care.⁷⁵

Animal welfare risks⁷⁶

- ▶ **Health, shelter, and nutrition:** Inadequate access to feed, water, shelter, and veterinary services can undermine animal welfare in both smallholder and industrial systems. Drought, poverty, and limited infrastructure heighten these risks. Reports from Ethiopia highlight poor housing and feed shortages, leaving animals vulnerable to hunger, disease, and preventable suffering.⁷⁷
- ▶ **Handling, restraint, and transport:** Rough handling, overcrowding, and long-distance transport expose animals to stress, injury, and exhaustion. Poor infrastructure and weak enforcement worsen the problem. In Brazil, cattle transport and live export have been linked to overcrowding and lack of rest causing significant suffering.⁷⁸
- ▶ **Procedures and health management:** In many countries, livestock are subjected to procedures such as castration and dehorning, often without pain relief, while disease management and antimicrobial use remain inconsistent. In China, reports highlight weak regulation of veterinary drug use and antimicrobial practices.⁷⁹

Environmental risks⁸⁰

- ▶ **Deforestation and land conversion:** Expanding cattle pasture is a leading driver of deforestation and land conversion in some countries, contributing to biodiversity loss, carbon emissions, and displacement of Indigenous Peoples and local communities. In Brazil, cattle ranching has contributed to large-scale clearance of the Amazon rainforest, with serious impacts on ecosystems and communities.⁸¹
- ▶ **GHG emissions:** Livestock are a major source of methane and nitrous oxide emissions through enteric fermentation and manure management. In Brazil, studies have documented how the world's largest commercial cattle herd contributes significantly to greenhouse emissions.⁸²
- ▶ **Water use and contamination:** Intensive livestock production intensifies water stress and poor manure management pollutes rivers and groundwater. Reports from China highlight severe local impacts, where waste from large-scale farms contaminates water sources, affecting ecosystems, agriculture, and surrounding communities.⁸³

Deforestation and conversion

Risk of deforestation and land conversion are now central concerns for brands and the leather industry, driven by NGO, media, and investor scrutiny,⁸⁴ regulatory requirements such as the [EU Deforestation Regulation](#) (EUDR), and the growing emphasis on nature-related reporting and science-based targets. The remainder of this chapter explores the key challenges and potential pathways to address these issues in more detail.

The [Accountability Framework Initiative](#)⁸⁵ defines deforestation as the loss of natural forests due to agriculture, other land uses, tree plantations, or severe long-term degradation. Conversion extends this to the loss of any natural ecosystem — such as forests, grasslands, or wetlands — through replacement by agriculture or significant disruption to its structure, species, or function.

As a by-product of the meat industry, the leather industry's contribution to deforestation and conversion has been disputed by some.⁸⁶ Nonetheless, brands sourcing leather have a responsibility to conduct due diligence and to work with the meat industry and other stakeholders to drive more sustainable practices along the supply chain.⁸⁷

South America has been a primary focus for brands and the leather industry. Countries such as Brazil, Paraguay, and Argentina face severe deforestation and conversion risks driven by cattle ranching and soybean expansion (a key source of animal feed), compounded by weak law enforcement and illegal land grabbing. From 2002 to 2024, Brazil lost 33.5Mha of humid primary forest — (9.8%),⁸⁸ with regions such as the Amazon Rainforest and Cerrado biome impacted heavily by agricultural expansion. Deforestation contributes significantly to GHG emissions, releasing large amounts of carbon stored in forest biomass and soils, and reducing the capacity of ecosystems to act as carbon sinks. While recent reports suggest deforestation is slowing in some regions,⁸⁹ the risk remains severe.

Deforestation and land conversion are closely tied to human rights risks, particularly in regions with weak land governance and where Indigenous or traditional communities rely on natural ecosystems for their livelihoods. An estimated 1.6 billion people depend on forests for their livelihoods, including around 70 million Indigenous Peoples.⁹⁰ In major cattle-producing countries, the expansion of pastureland has fuelled land conflicts, forced displacement, and the erosion of customary land rights. These impacts are often accompanied by exploitative labour conditions across upstream supply chains, including informal employment, inadequate protections, and poor OHS.⁹¹

Global frameworks increasingly recognise the need to integrate human rights into deforestation-free sourcing strategies.⁹² Land tenure insecurity, Indigenous rights,⁹³ absence of free, prior and informed consent (FPIC),⁹⁴ and social harm linked to a lack of traceability are all critical concerns. Companies sourcing leather from high-risk areas must ensure that due diligence addresses not only environmental loss but also the social and human impacts of land use change. Meaningful engagement with stakeholders, such as smallholders, women and Indigenous Peoples, enhances the inclusivity of activities and the sustainability of outcomes.

Addressing impacts — current brand practices

Based on an assessment of brand disclosures and stakeholder consultations, this section summarises how brands are currently approaching deforestation and conversion risks in leather supply chains, and how these practices align with OECD due diligence guidance.

1 Embed responsible business conduct into policies and management systems

Most brands' studied have adopted deforestation- and conversion-free (DCF) commitments, either as standalone policies or embedded in broader sustainability policies and strategies. These typically reference international frameworks and guidance such as the Accountability Framework Initiative (AFI),⁹⁵ the Deforestation Free Call to Action on Leather⁹⁶ (see case study below), and [OECD-FAO Business Handbook on Deforestation and Due Diligence](#).⁹⁷ Key elements include:

- ▶ No-deforestation and no-conversion goals
- ▶ Time-bound targets
- ▶ Grievance mechanisms
- ▶ Traceability requirements.

Human rights considerations, including land rights and impacts on local communities, including Indigenous populations, are also integrated. Some brands go further by incorporating DCF into broader biodiversity policies and strategies.⁹⁸

2 Identify and assess actual and potential adverse impacts

Most brands are mapping supply chains to the slaughterhouse-level, which is critical for understanding upstream deforestation and conversion risk. Some overlay slaughterhouse catchment areas with geospatial deforestation risk data and country-level social risk indicators, such as land conflict or child labour. While the ability to assess human rights impacts remains far more limited, brands are increasingly aiming to integrate both. For example, recent research by Fair Labor Association and Impactt has aimed to provide brands sourcing leather from Brazil with a more nuanced understanding of the risks and opportunities to address human rights in the supply chain.⁹⁹

3 Cease, prevent or mitigate adverse impacts

Based on initial mapping and risk assessments, some brands restrict sourcing from high-risk regions, while others set expectations for tanneries and slaughterhouses based on identified risks, including mandating documentation and due diligence to verify farm-level origin. The willingness of slaughterhouses to share this level of information often depends on the strength of commercial relationships between brands, tanneries and slaughterhouses and is challenging.

Several brands are also investing in regenerative farming to address environmental degradation. However, limited farm-level traceability still hampers the industry's efforts to practically address human rights risks related to cattle farming, such as the displacement of Indigenous communities and incidences of child or forced labour.

4 Track implementation and results

Brands periodically update supply chain mapping to slaughterhouse and geospatial analysis in high-risk regions to support ongoing monitoring of deforestation and conversion risks in their supply chain. Internal compliance teams monitor transactions and verify chain of custody documentation. However, very few brands are yet able to monitor and verify human rights impacts at farm level, reflecting persistent traceability challenges.

5 Communicate how impacts are addressed

Brand communications on deforestation and conversion have primarily been at policy-level to-date, with sustainability reports and related disclosures focused on supply chain mapping and deforestation risk assessment progress, as well as descriptions of risk mitigation approaches in high-risk regions. With a few exceptions, brands are not yet systematically measuring and communicating their land use impacts (along with human rights) and the effectiveness of risk mitigation strategies.

6 Provide for or cooperate in remediation when appropriate

Although gaps in traceability make targeted remediation difficult at this time, brands are beginning to invest in strategic initiatives aimed at addressing systemic roadblocks and encourage regenerative farming practices. Initiatives like the [Regenerative Fund for Nature](#)¹⁰⁰ and Deforestation-Free Leather Fund¹⁰¹ support ecosystem restoration and community livelihoods in leather sourcing regions.



Good practice and better practice actions

Drawing on the research and OECD guidance, the following actions are suggested for brands seeking to strengthen due diligence in livestock production, with a focus on deforestation and conversion.

✓ Good practice

✓ Better practice

1 Embed responsible business conduct into policies and management systems

- | | |
|---|--|
| <ul style="list-style-type: none"> ▶ Establish a DCF policy or integrate expectations into existing environment policies. Incorporate key human rights considerations, including impact on local communities and Indigenous populations. ▶ Set a public, time-bound DCF-free supply chain target. | <ul style="list-style-type: none"> ▶ Expand DCF into a broader biodiversity policy and strategy, including science-based targets and regenerative farming commitments. ▶ Embed DCF into enterprise-risk systems with senior oversight and a formal stakeholder engagement policy (including FPIC with Indigenous and local communities) and grievance mechanism. |
|---|--|

2 Identify and assess actual or potential adverse impacts

- | | |
|--|--|
| <ul style="list-style-type: none"> ▶ Map slaughterhouses and overlay geospatial deforestation risk and human rights indicator data. ▶ Where slaughterhouses are owned by larger meat processors, conduct desktop research to assess the strength of existing DCF policies and compliance procedures. ▶ For high-risk regions, request documentation from tanneries and slaughterhouses to deepen understanding of existing due diligence practices. | <ul style="list-style-type: none"> ▶ Pilot a farm-level, event-based traceability standard or programme (e.g. GSI EPCIS, VISIPEC) to support more granular deforestation and human rights risk assessments. ▶ In high-risk countries, partner with meat and livestock industry stakeholders, worker representatives, government and specialist NGOs on research projects aimed at developing a more nuanced understanding of deforestation-related risks, including impacts on local communities and Indigenous Peoples. |
|--|--|

3 Cease, prevent or mitigate adverse impacts

- | | |
|---|--|
| <ul style="list-style-type: none"> ▶ Cascade DCF expectations to tanneries and slaughterhouses in high-risk countries and mandate CoC documentation to verify that livestock does not originate from regions contributing to deforestation and conversion and displacement of local communities. | <ul style="list-style-type: none"> ▶ Investigate third-party certifications used by the meat industry in high-risk countries to further mitigate the risk of deforestation and to protect the rights of local communities and Indigenous Peoples. ▶ Commit to global partnerships (e.g. DFCTA) aimed at addressing systematic barriers, sharing resources and expertise, and scaling-up action. ▶ In high-risk countries, partner with meat and livestock industry stakeholders, worker representatives, government and specialist NGOs on research and advocacy initiatives aimed at strengthening respect for the rights and protection of local communities and Indigenous Peoples impacted by deforestation and conversion. |
|---|--|

4 Track implementation and results

- ▶ Periodically update supply chain mapping to slaughterhouse and geospatial analysis to support ongoing monitoring of deforestation and conversion risks in the supply chain.
- ▶ Where sourcing from high-risk regions, monitor ongoing compliance with farm origin and CoC requirements.
- ▶ Invest in advanced, real-time monitoring systems (e.g. [Global Forest Watch](#), [Planet Labs](#)) to identify and report on deforestation risks in the supply chain and trigger alerts for immediate investigation.
- ▶ Review the effectiveness of national research and advocacy initiatives aimed at strengthening respect for the rights and protection of local communities and Indigenous Peoples, including the potential to expand initiatives to other high-risk countries and regions where relevant.

5 Communicate how impacts are addressed

- ▶ Disclose DCF commitments and general progress via sustainability reports and related public disclosures.
- ▶ Measure and publish detailed metrics annually as part of sustainability reports and related disclosures, including land use impact and % of verified DCF volumes.
- ▶ Report on the progress and outcomes of national research and advocacy initiatives via sustainability reports and related public disclosures.

6 Provide for or cooperate in remediation

- ▶ Building on supply chain mapping, assess the effectiveness of existing DCF-related remediation policies and procedures of meat processors in high-risk countries.
- ▶ Where an adverse deforestation impact (including human rights) has occurred, engage with tannery partners and relevant meat processors to assess the effectiveness of existing remediation approach and, if required, the potential for shared action.
- ▶ Invest in strategic initiatives aimed at addressing systemic barriers and encouraging regenerative farming practices (e.g. Regenerative Fund and DFL Fund).



Case study: Deforestation-Free Call to Action for Leather: Partnering for systemic change

The [Deforestation-Free Call to Action for Leather](#) (DFCTA) is an industry-led initiative co-led by Textile Exchange, the Leather Working Group (LWG), and World Wildlife Fund (WWF). Launched in June 2023, it aims to eliminate deforestation and conversion from bovine leather supply chains by 2030 or earlier. The initiative responds to the environmental risks linked to cattle ranching, particularly in high-risk biomes such as the Amazon and Cerrado, and supports alignment with global climate and biodiversity goals.

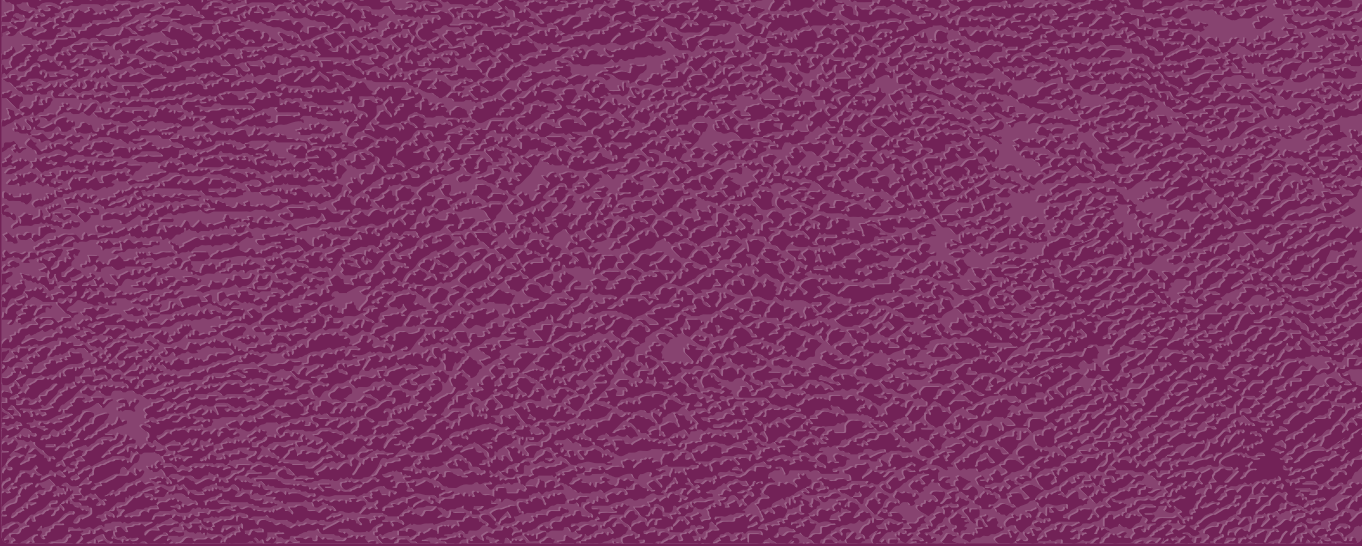
Brands acting alone often face challenges — limited visibility and leverage with upstream supply chains, inconsistent expectations across sourcing regions, and a lack of harmonised standards. Without alignment, they also have limited leverage to drive systemic change. The DFCTA addresses these barriers by promoting cross-industry collaboration, a unified framework, and shared impact.

Participating brands commit to:

- ▶ Set and cascade deforestation/conversion-free sourcing requirements
- ▶ Set and meet targets for mapping supply chains to slaughterhouse-level
- ▶ Invest in increasing supply of traceable, DCF leather — especially at farm-level
- ▶ Implement traceability systems to verify DCF sourcing
- ▶ Respect human rights, including those of Indigenous Peoples and local communities
- ▶ Report annually via [Textile Exchange's Materials Benchmark](#).

The DFCTA roadmap is structured in two phases. Phase 1 (2023–2025) focuses on supply chain readiness – onboarding brands, raising awareness, mapping supply chains to the slaughterhouse level, and identifying regionally appropriate verification approaches. Phase 2 (2025–2030) focuses on implementation – supporting brands to begin sourcing verified DCF leather, increasing verified supply, and tracking collective progress annually. To support this, the initiative provides signatories with technical guidance, tools, and regular updates.

To date, over 20 companies — including major fashion, footwear, luxury, and automotive brands — have joined the DFCTA, helping build momentum toward a sector-wide transition to verified deforestation- and conversion-free leather sourcing.



Conclusion

Embedding HREDD as a continuous process that goes beyond audits and certifications, provides brands with a pathway to build the trust, visibility, and collaboration needed to address adverse impacts and drive improvement across leather supply chains.

Drawing on this research, brands should focus on five key due diligence priorities:

- ▶ **Supply chain mapping:** As an essential first step, companies should begin mapping their supply chains. This is a complex, trust-based process that takes time, especially when working with direct suppliers and tanneries to trace back to earlier tiers.
- ▶ **Meaningful stakeholder engagement:** Effective HREDD requires brands to actively engage with a wide range of stakeholders, including workers, trade unions, communities, and civil society organisations. Building these relationships ensures that risks are understood from multiple perspectives and that solutions are grounded in local realities.
- ▶ **Leverage and long-term commitment:** Companies need to identify where they have leverage to drive change and take steps to increase it. Where severe risks are identified, they must be willing to invest in long-term engagement and collaborate with others to address systemic issues.
- ▶ **Cross-sector learning:** The leather sector can draw on lessons from other industries, such as ready-made garments (RMG), where worker engagement, social dialogue, and gender-sensitive approaches have proven effective. Adapting these insights to the leather context will accelerate progress and strengthen risk mitigation.
- ▶ **Responsible purchasing practices (RPP):** A company's buying practices have a direct impact on supplier, human rights and environmental outcomes. RPP must therefore be fully integrated into HREDD efforts.

By prioritising these areas, brands can not only meet regulatory requirements but also deliver meaningful improvements for workers, communities, and the environment — helping to build a more sustainable and responsible leather supply chain.

List of leather supply chain stakeholders

The following stakeholders are active in the leather supply chain and related sectors and can provide brands with useful resources and support.

Organisation	Type
▶ IndustriALL Global Union	Trade union
▶ UNI Global Union	Trade union
▶ ITUC	Trade union
▶ Fair Labor Association	Not-for-profit
▶ Sustainable Leather Foundation	Not-for-profit
▶ Leather Working Group	Not-for-profit
▶ Textile Exchange	Not-for-profit
▶ The Deforestation-Free Call to Action for Leather	Not-for-profit
▶ Shift Project	Not-for-profit
▶ Together for Decent Leather	Not-for-profit
▶ WWF	Not-for-profit
▶ Accountability Framework Initiative	Not-for-profit
▶ The Global Roundtable on Sustainable Beef	Not-for-profit
▶ Consumer Goods Forum	Not-for-profit
▶ Conservation International	Not-for-profit
▶ International Council of Tanners	Employer representatives
▶ COTANCE	Employer representatives
▶ International Labour Organisation	Intergovernmental organisation
▶ OECD	Intergovernmental organisation

Glossary

- ▶ **CAP (Corrective Action Plan):** A remediation tool enabling suppliers to address non-compliances and provide proof of improvement.
- ▶ **CoC (Chain of Custody):** A system for transferring, monitoring and controlling inputs, outputs, and associated attributes as they move through the supply chain.
- ▶ **DCF (Deforestation- and Conversion-Free):** A commitment by companies to source commodities that do not originate from land converted from natural ecosystems, including forests.
- ▶ **EU CSDDD (European Union Corporate Sustainability Due Diligence Directive):** A European directive requiring companies to identify and address negative human rights and environmental impacts in their operations and global value chains to promote sustainable and responsible business conduct.
- ▶ **EUDR (European Union Deforestation Regulation):** A law requiring companies to ensure that specific commodities placed on or exported from the EU market are legally produced and deforestation-free.
- ▶ **FoA (Freedom of Association):** The right of workers and employers to freely form or join organisations that promote and defend their interests at work, without interference from one another or from the State.
- ▶ **FPIC (Free, Prior and Informed Consent):** Consent that is given freely, by people fully informed of the consequences, prior to any decision being made, and according to their own decision-making processes.
- ▶ **GHG (Greenhouse Gases):** Gases that trap heat in the atmosphere. These include carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O), amongst others. The accumulation of greenhouse gases in the atmosphere is the cause of global warming and climate change.
- ▶ **GSI EPCIS (Electronic Product Code Information Services):** A global supply chain data standard for capturing and sharing event data, enabling interoperability in traceability.
- ▶ **HREDD (Human Rights and Environmental Due Diligence):** A continuous cycle of identifying, preventing, mitigating, and remediating risks to people and the environment connected to a company's activities, value chains, and business relationships.

- ▶ **LWG (Leather Working Group):** A global not-for-profit multi-stakeholder initiative that promotes responsible leather production through standards.
- ▶ **MRSL (Manufacturing Restricted Substances List):** A list of restricted substances specific to the manufacturing process.
- ▶ **MSE (Meaningful Stakeholder Engagement):** A genuine, ongoing two-way dialogue with rightsholders and other key stakeholders that addresses human rights concerns and leads to meaningful action.
- ▶ **MSI (Multi-Stakeholder Initiative):** A collaborative platform or partnership that brings together diverse groups, including enterprises, trade unions, NGOs, governments, academia and other relevant actors to jointly address complex societal challenges.
- ▶ **OECD RBC Framework:** A six-step due diligence framework from the OECD for responsible business conduct.
- ▶ **PLM (Product Lifecycle Management):** A set of processes and technologies used to manage the entire lifecycle of a product, from conception to disposal.
- ▶ **RBC (Responsible Business Conduct):** Business efforts to prevent and address any negative impacts their activities have on people and the environment, both in their own operations and throughout their supply chains.
- ▶ **RPP (Responsible Purchasing Practices):** ‘Purchasing practices’ are the actions taken by a buying company in order to purchase a product, raw material, or service (in whole or in part) from a supplying business. They encompass technical specifications, forecasting, production planning, contracts, order placement and lead times, cost and price negotiations and payment terms. ‘Responsible purchasing practices’ are purchasing practices which do not negatively impact the human rights of workers or harm the environment.
- ▶ **RSL (Restricted Substances List):** A list of chemicals that are restricted in products to ensure compliance with safety and environmental standards.
- ▶ **Social Compliance Audit:** Audits that evaluate an organisation’s ethical and social practices. They examine aspects such as working conditions, employee treatment, and the broader impact a company has on the communities in which it operates.
- ▶ **Supply Chain Mapping:** The process of capturing information from all suppliers or individuals involved in a company’s supply chain, so that the origin and flow of goods and services can be understood from beginning to end.
- ▶ **Traceability:** The ability to track and verify a material’s movement through production, processing, and distribution stages.
- ▶ **UNGP (The United Nations Guiding Principles):** The global authoritative standard on the business responsibility to respect human rights. These were endorsed by the UN Human Rights Council in 2011. They apply to all States and to all business enterprises, regardless of their size, sector, location, ownership and structure.

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