Change your Shoes ANSWERS TO UNIC'S CRITICISMS

1. ANSWERS TO THE GENERAL CRITICISMS EXPOSED IN THE INTRODUCTION

UNIC wrote: «A large number of false claims, which are completely unsupported by official data. Even the data presented as provided by official sources are incorrect, incomplete, confused, contradictory»

Answer:

This point will be discussed case by case in the next pages, where we report the sources we used and demonstrate our adherence to the sources.

UNIC wrote: «In some cases the author made a selective choice of the data within the same source»

Answer:

Every research needs selective choices, being the same selection process an important step in researching.

UNIC wrote: «The report completely lacks a scientific approach, every staged evidence seems chosen to demonstrate an aprioristic thesis. The negative and prejudicial opinion against the sector is evident: every aspect is presented with a specific choice of language and through negative metaphors, thus indicating a pre-constituted opinion».

Answer:

Writing is the last stage of any research. Therefore, it seems quite inappropriate to refer to rethorical choices (language and metaphors) in order to demonstrate the existence of a "pre-constituted opinion". Style is chosen depending upon the kind of reader to whom the documents are addressed. Our documents are addressed at the general public that needs the help of metaphors in order to understand technical points out of everyday life.

UNIC wrote: «As regards the market and working conditions, many references are related to local press articles, rumors, opinions»

Answer:

Press articles, rumours and opinions are sources of information. The duty of the researcher is to indicate them, leaving it to the reader to decide on the effectiveness and reliability of the source.

UNIC wrote: «Many information are completely out of context and out of the declared scope of the project».

Answer:

This is an unjustified point. Given that UNIC is not entitled to discuss the scope of the project, all we have researched and reported, is perfectly coherent with the project that aims at "consumers become more aware that the lifestyle choices come with responsibilities and through advocacy enhanced by better and relevant information they can instigate policy change that, in the interest of human rights, will ultimately improve the working conditions and well-being of those further down the production chain in the shoe industry".

UNIC wrote: «The description of the tanning process from a technical point of view is very imprecise and contains many gross mistakes.»
Answer:
This point will be discussed in the next pages.

UNIC wrote: «Across the whole report, the authors' prejudice against leather because it is a product of animal origin and their ideological bias against multinational businesses in itself appear clearly».
Answer:
The claim is baseless: all statements have been supported by data and objective arguments.

2. ANSWERS ABOUT THE REPORT "A TOUGH STORY OF LEATHER"

In relation to the following excerpt: "*Entities in the tanning industry claim to play a positive environmental role, because they remove a waste product generated by the meat industry, much in the way of scavengers. But the quantities of money surrounding the leather industry are so substantial that it is difficult to see the industry as one that relies on the production of leftovers by other sectors*" (page 3), **UNIC wrote:** «Prejudice against the industry: it is a fact that tanning industry recycles a waste product of meat industry».
Answer:
The statement points at clarifying that tanning industry is organized not to guarantee an environmental service to the community, but to provide an economic return to private investors. The United Nations Industrial Development Organization puts the global trade value of leather at US$ 80 billion per year (see UNIDO, *Greening Food and Beverage Value Chains: the Case of the Meat Processing Industry. A report for the UNIDO Green Industry Initiative,* Vienna, 2013).
If the goal of tanning industry was to rid the community of a waste produced by the meat industry, it should not be worried about the shortage of skins, but rather rejoice.

In relation to the following excerpt: "[…] *leather sector shows that there is a general complaint by owners of tanneries about the dearth of raw material. So the more likely scenario is two sectors, the meat industry and the leather industry, working together as allies to create growth in livestock farming and slaughtering*" (page 3), **UNIC wrote:** «Unsupported defamatory accusation».
Answer:
Concerns about the shortage of raw material were expressed also by COTANCE Presidency on April 3, 2013 in Bologna[1].
The link between production of meat and supply of hides is stated repeatedly by COTANCE: "Red meat production and consumption patterns are crucial for the supply of raw materials to the sector" (COTANCE-IndustriAll, *A Future for European Leather! Final Report,* 2016). Furthermore the magazine " MDP- laCONCERIA" on April the 2nd 2014, while announcing that Rino Mastrotto was elected new president of International Council of Tanners, states that the program for the coming years is based on four points, the first one of which is "to communicate through media actions, the benefits of consumption of red meat to reverse the *parabola* of slaughterings". Moreover, industrial firms such as JBS, being at the same time big producers of meat and big tanners, confirm the interlacing of economic interest by the two sectors.

[1] http://www.euroleather.com/index.php/homepage/list-of-news-releases/98-shortage-of-raw-materials-for-eu-tanners

In relation to Box 1 "The environmental impact of farming" (page 4), **UNIC wrote:** «Completely out of context and proof of an ideological prejudice against the leather industry».

Answer:

COTANCE itself draws attention to the issue. A document published in Spanish on February 2016, entitled "*Manifiesto de los interlocutores sociales de la industria de la piel*", states the following: "Should the current trends of production and consumption be confirmed, in the year 2050 we will need resources equivalent to two and a half planets to sustain the world's population".

In relation to the following excerpts: "*The trend therefore indicates a gradual increase in the share of production by countries in the South, while the North is progressively reducing its commitment to an activity that poses certain environmental issues*" (page 7), and "*It is a type of production activity that advanced nations are tending to divest themselves of because of the substantial pollution that it generates*" (page 8), **UNIC wrote:** «Wrong explanation of a phenomenon, indicating poor knowledge of the sector's dynamics. The reduction of slaughtering activity in the North is certainly not related to environment protection but to more complex market factors».

Answer:

The text is not talking about slaughtering activity, but about tanning activity.

In relation to the contents of the chapter "1.4. Processing and trading of semi-processed leather", UNIC wrote: «The description of trade barriers is incorrect. The explanation of EU strategy to blackmail developing countries in favor of the EU tanning industry (Box 2 - Kenya's reasons and opposition from Europe) is untrue and completely unsupported».

Answer:

COTANCE itself states that "export restrictions and dual pricing of raw materials erode the competitiveness of leather not only in open economies, but also in those protectionist economies where trade barriers fail to produce the development objectives intended. This has highly adverse consequences on the European leather business model. Domestic availability of hides and skins is insufficient to guarantee the leadership role that Europe's leather industry plays in the global context" (COTANCE-IndustriAll, *A Future for European Leather! Final Report,* 2016).

Given the lack of "any full studies on these mechanism", as we say at page 8, every statement about trade barriers made in our report is clearly linked to a source. Information contained in Box 2 are taken from Mark Curtis, "*Developing the Leather Sector in Kenya through Export Taxes: The Benefits of Defying the EU*" (document produced with the financial assistance of the European Union).

In relation to the following excerpt: "*EU is a major net importer of wet blue and that its intention is to produce finished leather, because this is the area where the greatest profits can be achieved*" (page 11), **UNIC wrote:** «The analysis of the trade flows of the sectors and its conclusions reveal scarce knowledge of the sector. Finished leather has always been the specialization of EU and Italy and has higher added value compared to semi-finished products. That is the reason why every tanning country is competing in that segment».

Answer:

There are no substantial differences in the two statements.

In relation to the following excerpt: "[…] *the introduction of stricter environmental laws forced companies to make investments that not all of them wished to make or could sustain*" (page 15), **UNIC wrote:** «Misleading sentence, that seems to suggest that the majority of Italian tanneries preferred to change raw material rather than to comply with environmental protection legislation. This is false. Every company has to comply with Italian and EU law, which is among the most restrictive in the world. Moreover, wet blue is not substituting the raw hides and skins at all. The alternative use of the two materials depends on market factors that the author ignores. In a (hypothetical) liberalized world market, almost all Italian tanneries would prefer to buy raw hides and skins and make the whole process in Italy for quality control reasons».

Answer:

The text simply says that every operator decided to make its own economic choice in a legislative context under transformation.

In relation to Box 1 (page 18), UNIC wrote: «There is no link between the two big companies and one of the two was not involved in the tax evasion case of 2011 to which the study refers. The box just refers to "*no available information*", therefore admitting that every statement is a supposition based on the author's personal opinions. Mistaken reference to Greenpeace report».

Answer:

We are aware that Mastrotto Group and Rino Mastrotto Group were involved in two different cases, but both investigations run by public authorities, aimed at verifying missed payments to public coffers. The news was reported by many media among which Il Giornale di Vicenza, 31st August 2011 under the title "*Alla Rino Mastrotto nero per 174 dipendenti*".

The sentence "*no available information*" refers only to business in Brazil. As indicated in the notes, Mastrotto are repeatedly cited in the report *Slaughtering the Amazon* produced by Greenpeace International, in June 2009 (see further details at page 13 of this document).

In relation to the following excerpt: "*Like a spider in the middle of a vast web,* […] *receives orders from every corner of the globe and fills them by activating the tannery within its group that best meets the needs of the customer in terms of price, quality and distance*" (page 20), **UNIC wrote:** «Pre-constituted negative opinions on the sector expressed by a specific negative metaphor ("*a spider in the middle of a vast web*") to describe a multinational business, which is presented as if there was something immoral behind the appearance. This is a general attitude across the report».

Answer:

The metaphor has been used just to help the reader understand a complex trade mechanism.

In relation to chapter 3.1. "Organizational structure and employment" (page 21), UNIC wrote: «The source of data related to number of companies and employees is missing. We do not agree with numbers. Not even in the most flourishing period of tanning activity the industry in that area could count 12,700 workers. It could be an aggregate of leather-footwear-leather goods. Moreover, the study reports contradicting data».

Answer:

The number was calculated using data provided by the Chamber of Commerce of Pisa and Employment Management Centre of Pisa, taking into account workers employed, not only by tanning companies and their subcontractors, but also by companies that perform support activities (such as commercial and technical assistance). Furthermore the number includes workers employed, both directly by producing companies and indirectly through temporary agencies.

In relation to the following excerpt: "*Many families who own tanneries have made their fortunes with skins and are now expanding their activities into other sectors. […] for example, owns not just*

three tanneries but also various agricultural farms in Tuscany. Until June 2014, the family also had a major shareholding in the company operating Pisa Airport. They then sold this to a wider Argentinian company, Corporacion America, and we do not know what became of the tidy sum generated by that sale" (page 23), **UNIC wrote:** «The judgement on the personal investments of families running tanning businesses is out of the scope of the project. Normal and legal business operations are described by suggesting illegal or unclear behaviour».
Answer:
The text doesn't express judgements: it only refers facts appeared in the media and circumscribes what remains unknown.

In relation to the following excerpt: "*In the case of orders from major brands, the goods are always subject to inspection prior to delivery. They are examined either in the tannery by experts sent by the purchaser companies, referred to as 'pickers', or at the premises of the brands by their own quality control departments. In some cases, some of the goods are rejected because of defects, and the tannery must then invent a way to resell them. «Discarded items are either kept in the warehouse for resale to someone who is happy with a lower-grade product, or they are coloured black, because black covers everything. If it is not a special item, everything is coloured black*" (page 25), **UNIC wrote:** «Defamatory and misleading information. There are defects in tanning production because raw hides are a natural product, with unique characteristics. There are obviously different ranges of production, with different grades. It is just a different target price/segment. The idea suggested here is instead of a product of scarce quality and of a swindle for customers».
Answer:
The text only reports the experience of a worker employed in a tannery processing sheep hides.

In relation to chapter 3.5. "Methods of employment and illegal work", UNIC wrote: «Unsupported opinions, confused and wrong data to suggest the idea that workers are illegally exploited». **In relation to the following excerpt:** "*So, within the same company, there are workers with tannery contracts and others who, despite doing the same jobs, have support services contracts, which obviously are less costly for businesses and do not envisage any kind of specialization: workers are not trained for the jobs they do, especially in terms of safety. Furthermore, for these workers, overtime pay is shown as travel, so companies do not need to pay PAYE or social security contributions. The system works even better if the cooperative is based in another province, as in the case we uncovered*" (page 26), **UNIC wrote:** «There is no evidence of the use of that kind of contract for tanneries».
Answer:
The statement was made by Loris Mainardi, a trade union leader in Santa Croce. As indicated in the notes the statement appeared in an interview entitled "Troppe situazioni anomale nelle aziende del cuoio. Lavoratori senza tutele", *Il Tirreno*, 5 October 2011.

In relation to the following excerpt: "[…] *another even more convenient method is the use of labor supplied by temping companies, also referred to as employment agencies*" (page 26), **UNIC wrote:** «Defamatory and unsupported statement. Tanneries require temporary work because theirs is an activity with seasonal dynamics. The conditions and limits of use of temporary employment contracts are settled by the law. The study presents data on temporary jobs to suggest the idea of workers exploitation».
Answer:
The text doesn't say that temporary work is illegal. It just says that it is convenient for companies.

In relation to the following excerpt: "*In 2014, temp workers numbered 3 451, but there were 5,021 contracts concluded: one and half times the number of workers. This indicates that many workers are employed on a stop-and-start basis for periods that can be very brief*" (page 28), **UNIC**

wrote: «Incorrect data. The number of temporary workers is wrong. It is impossible that such a high number is referred only to tanneries, it is probably an aggregate of sectors. In addition, there is a misleading interpretation: considering the seasonal nature of the work in the tanning sector, 1.5 contract per worker is definitely not an indicator of stop-and-start occupation, but exactly the opposite».

Answer:

As indicated in the notes, data have been obtained from Employment Management Centre, Pisa, "*Sintesi statistica Centro impiego Santa Croce S/Arno focus Valdarno*", 2015. For what concerns the period of employment, Tania Benvenuti, another union leader of the CGIL, has reported that she has in fact heard a report of a worker with a contract for four hours: hired at 8:00 am and let go at midday. The news appeared also in the press (see Carlo Baroni, *"Assunto alle 8, licenziato a mezzogiorno: contratto interinale per sole quattro ore"*, La Nazione, 4 March 2015).

In relation to the following excerpt: "*From 1 January 2011 to 31 December 2014, Santa Croce (excluding the municipality of Fucecchio) saw inspections of 185 businesses (tanneries and sub suppliers) and a total of 1 024 workers. Of these, 70% were Italian and 30% immigrants. In all, illegal aspects were identified in relation to 217 workers, 116 of whom were totally undeclared. 43% of the individuals working on an undeclared basis were immigrants"* (page 28-29), **UNIC wrote:** «Incorrect, incomplete and misleading data. The Labour Directorate of Pisa province confirmed that the data refer to tanning and footwear industry (probably referring to ATECO 151, which includes leather goods). The sample cannot be considered as representative, as the companies to be verified are selected based on a previous analysis of the risk. Irregularities are an exception whilst here they are presented as a standard».

Answer:

Numbers have been calculated from data provided by the Provincial Labour Directorates in Pisa. Ateco codes were not provided in the official data, however a revision on a geographical basis will be considered.

In relation to the following excerpt: "*Despite the significant degree of mechanization, processing of skins continues to be a difficult and laborious activity because of the physical effort, noise, humidity and chemical fumes involved. This explains why 80% of persons permanently employed are males, while 16% are immigrants from non- EU nations*" (page 30), **UNIC wrote:** «Defamatory and misleading statement. The tanning industry is described as uncomfortable and discriminating, but the rate of men, women and immigrants employed depends on many elements. It is not a matter of uncomfortable job (some operations are considered heavy, as it is in general in the industry) and in fact the percentages of working women on total workforce of other Italian leather clusters are much differentiated. The different assignments of women are not a typical aspect of the tanning industry, but a general feature in many industries».

Answer:

The fact that heavy jobs are usually covered by males and possibly immigrants is an evidence. By no means the report maintains that this implicates a sort of intentional discrimination. As a whole, it is not clear what is the point of the remark.

In relation to Graph 4 *"Workers permanently employed in the tanning district by nationality*" (page 30), **UNIC wrote:** «Incorrect graph: 16% is represented as one fourth. This is another example of the high level of impreciseness of the report».

Answer:

In effect, a human error produced an imperfect graphic. The inexactitude will be corrected.

In relation to the following excerpt: "*In addition to doing the heaviest, dirtiest forms of work, temp workers also work under worse safety conditions*" (page 33), **UNIC wrote:** «Incorrect and defamatory claim».

Answer:

This appears to be an unclear point. The statement expresses the reality told by the immigrants interviewed. It's their experience. We don't see where the defamation is and against whom.

In the relation to the chapter 3.6 "The lives lived by immigrants", **UNIC wrote:** «There is a long description of working conditions of Senegalese (also the single story of one of them) based on interviews, but no scientific value can be attributed to those information as there is no reference to how many people have been interviewed, nor to how many and which questions have been asked. Only decontextualized sentences are reported».

Answer:

Scientific literature broadly makes use of oral interviews, without need of statistical evidence: it's called "qualitative approach" to oral interviews, or simply "qualitative interviews". See, for example: Rosalind Edwards and Janet Holland (eds.), *"What is qualitative interviewing?"*, London-New Delhi-New York-Sydney, Bloomsbury, 2013. The research used semi-structured interviews, in order to keep the attention on a set of key questions, but also allowing the interviewer to diverge in order to pursue an idea or response in more detail.

As required by a scientific approach, the individual cases are clearly presented for what they are: individual cases. The voices we have reported are the voices of immigrants working as temporary workers. People too scared of loosing any job opportunity to appear publicly. Data about illegal work and about temporary work confirm that immigrants are the most vulnerable and the most disadvantaged workers in the district.

In the relation to the chapter 3.6 "The lives lived by immigrants", **UNIC wrote:** «We read five names (Sylla, Mbaye, Mamadou, Diolas, Amina), and their statements are reported again as if it was the standard situation of tanneries. The conclusion of the paragraph provides an overview of the consequences of the economic crisis, focusing only on immigrants. However, the crisis is a general problem, touching every worker in every sector».

Answer:

The issue of the chapter under scrutiny is precisely working condition amongst the immigrants. Any way, interviews were made also with non-immigrant workers: see interviews to Mario (page 31) and Piero (page 36).

In relation to the following excerpt: "*The injustice of the Italian system is clear for all to see every day. Years and years of contributions paid to the national social security system, which will be all but impossible to turn into a pension when you leave, and an unemployment benefit granted only to those who can prove the existence of an employment contract for two consecutive years. These are measures deemed to be inadequate to support those experiencing difficulty after having worked for decades in tanning businesses*" (page 34), **UNIC wrote:** «This statement can be referred to everybody, not only to immigrants working in a tannery!»

Answer:

We completely agree with this statement. Nevertheless, it is not less true that this can be referred also to the tanning sector. The immigrants interviewed have always been working in the tanning industry, therefore tanning is their sector of reference.

In relation to the following excerpt: "*The salaries brought home by workers depend on the jobs they perform, the basis on which they were hired and the type of contracts applied. For temp*

workers, the amount depends primarily on the number of hours worked. In terms of hourly pay, few complain. A level-two labourer, which is the most common, often earns between 8.00 and 9.00 euros net, but if the number of hours is limited, the final sum is basically poverty. The story is different for labourers employed directly under permanent contracts, who perform the same work but can be paid up to 200 euros more each month, depending on the type of company they work for. Salaries in the tanning sector are set on the basis of a national agreement concluded between the National Union of Tanneries (UNIC) and the relevant trade unions […]" (page 34), **UNIC wrote:** «Misleading. A normal situation is described as a problem, implying that it is a matter of exploitation».

Answer:

This is an inconsistent point. In the passage quoted, a normal situation is described exactly as a normal situation. The text only highlights the difference between temporary workers and permanent workers. Not clear where the problem is.

In relation to the following excerpts: "[…] *the law sets a working week of 40 hours, except in the case of more favorable provisions laid down in collective bargaining agreements. It then adds: «The average duration of the working period may not in any case exceed, for each period of seven days, a total of forty-eight hours, including overtime hours». In other words, overtime may not exceed eight hours a week or 250 hours over the entire year*" (page 35); "*In Santa Croce, it is usual to work more than 40 hours a week, to the point that a work day of eight hours is considered to be a crisis. Use of overtime is normal practice, partly for technical reasons and partly for economic reasons*" (page 35); "*And Piero notes: «Here it's another world, we call it the Leather Republic. Now there is a high workload and we're doing eight hours of overtime a week, so 32 each month. On Mondays and Fridays, we do nine hours and on Tuesdays, Wednesdays and Thursdays we do ten. Obviously this is something that is happening for these months now, and then the other months of the year we work eight hours. So, yes, sometimes you're tired in the evening, you feel that it's a pace that sometimes says: we can't keep on like this»*" (page 36), **UNIC wrote**: «Misleading and defamatory statements. The description refers to a situation that is perfectly within legal limits, but it is described in negative terms».

Answer:

This is an inconsistent point. Not all legal situations are by definition positive situations. Not surprisingly, society is engaged in a continuous effort to improve the law. We don't really see where the defamation is.

As a final consideration about chapter 3.7 "Salaries and working hours", **UNIC wrote:** «industrial relations with trade unions in the tanning sector are consolidate and characterized by a mutually beneficial dialogue. A situation such as the one described in the document, reporting widespread poor working conditions in the sector, has never emerged».

Answer:

Industrial relations are not within the scope of this research that focuses on human, social, and environmental issues with the aim of obtaining the solution of the problems.

In relation to the following excerpt: "*In their lengthy journey from rawhide to finished product, skins pass through many different phases and move through many different firms*" (page 36), **UNIC wrote:** «Incorrect and misleading statement. The movement of skins and semi-finished leather

through many different factories is not common, nor a routine for all companies and for many processes as the document seems to imply. The description of the sector is not adherent to reality».

Answer:

This is a surprising statement. On its web site, Assa Terzisti, the organization representing subcontracting firms, states that 200 process operations are provided by subcontractors in the district. Leathers in and out of tanneries is considered a perfectly normal situation in the district.

In relation to the following excerpt: "*Each processing operation entails a potential risk for the health of workers, and, indeed, can become a real threat depending on the choices made by individual operators*" (page 36-37), **UNIC wrote:** «Misleading. That is true for all jobs and industrial activities».

Answer:

All that is true for all industrial activities, is also true for the tanning sector.

In relation to the following excerpt: "*In total, there were 176 serious accidents (25%), including one fatal accident, in 2012. The owner of a subcontractor company was struck by a forklift and died of a brain hemorrhage. The previous death occurred in 2004* […]" (page 38), **UNIC wrote: Incorrect and defamatory. The source of the data is missing. The official number declared by** INAIL (Italian Workers Compensation Authority), concerning the rate of serious accidents in the tanning sector in the referred period (2009-2013) is much lower. In addition, the frequency index of accidents in the leather sector (number of accidents per 1000 employees, source: INAIL for the period 2003-2005) is much lower than the average in all industrial sectors. The real picture therefore is of a virtuous industry. The fatal accident happened in 2012 was not related to the tanning sector, but, as declared by INAIL, to a self-employed entrepreneur who provided logistic services to the tanneries. That means that since 2004 no fatal accident has happened in the tanning industry.

Answer:

Data have been provided by Health Unit 11 of Empoli. The text itself refers that the dead person in 2012 was the owner of a subcontracted company.

In relation to the following excerpts: "*In addition to accidents, tanneries also have to deal with the problem of occupational diseases*" (page 39); "*There have been 493 cases of occupational illness recognized in Santa Croce between 1997 and 2014*" (page 39); "*The cases observed show sensitisation towards chromium and its compounds (chrome trichloride and potassium dichromate, a total of 36.4%), colourants (18.2%), formaldehyde and glutaraldehyde (10.6%), and rubber compounds (9.1%)*" (page 41); "*[…] Chromium salts are nevertheless one of the listed substances that can cause bronchial asthma*" (page 41), **UNIC wrote:** «Incorrect data presented in a misleading way. Incorrect description of the use of chemicals: the chromium compounds reported are not used in the tanning sector, but by the chemical companies».

In relation to the following excerpt: "*The Italian Workers Compensation Authority (INAIL), however, recognizes the occupational illness in workers who have been exposed to carcinogenic aromatic amines used above all as colourants in many sectors. In tanning processing and in finishing of skins, there has been documented use in the past of substances evaluated by the IARC as certain or suspected carcinogens for the bladder*" (page 40), **UNIC wrote:** «Misleading information. The sale and use of carcinogenic aromatic amines and colorants that can generate them were banned in the EU in 2002».

In relation to the following excerpt: "*The cases observed show sensitisation towards chromium and its compounds (chrome trichloride and potassium dichromate, a total of 36.4%), colorants*

(18.2%), formaldehyde and glutaraldehyde (10.6%), and rubber compounds (9.1%)" (page 41), **UNIC wrote:** «Incorrect, misleading, and out of the scope. Reference to chromium forms are incorrect. Indeed, the chromium form used as tanning agent is not a sensitizer. In addition, the assertion related to colorants is too generic».

Answer:

All information given in this chapter of the report, strictly adhere to what was written by Dr. Enza Tonina Iaia, officer in charge of the Occupational Health Department in Healt Unit 11 of Empoli.

In relation to the following excerpt: "*For each tonne of rawhide, the industry obtains 200-250 kg of leather, tanned using chromium, which require a total of 15-50 tons of water, 500 kg of chemical substances and 9.3-42 GJ of energy*" (page 42), **UNIC wrote:** «Incomplete and misleading. References to the BREF data are not complete. Figures are presented as they were highly impacting. If not placed in the correct context, the assertion sounds denigrating Italian tanning industry and therefore out of the project's scope». **In relation to the following excerpt:** "*Thus, for each ton of skins processed, we obtain 60-250 tons of waste water to be purified (with 20-30 kg of chromium and 50 kg of sulphide, among others), 1800-3650 kg of solid residues, 2500 kg of sludge, 4-50 kg of solvents in emissions of air*" (page 42), **UNIC wrote:** «Incorrect and defamatory. Wrong calculation of impacts per reference unit».

Answer:

As indicated, the data used come from the Joint Research Center Reference Report edited by the European Commission, Institute for prospective technological studies: *"Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins. Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control)*", Report EUR 26130 EN, by Michael Black, Michele Canova, Stefan Rydin, Bianca Maria Scalet, Serge Roudier, Luis Delgado Sancho (Luxembourg: Publications Office of the European Union, 2013), page 55.

In relation to the following excerpt: "*The Aquarno, which is larger, treats 4.5 million cubic metres each year, ¾ industrial and ¼ civilian*" (page 44), **UNIC wrote:** «Incorrect data».

Answer:

In effect, according to the document "*Quadro conoscitivo degli impianti del Comprensorio del Cuoio* Marzo 2013" produced by the Hydric Authority, the average annual inflow for Consorzio Aquarno is even higher: we opted to keep our description on a prudential scenario.

In relation to the following excerpt: "*Cuoiodepur produces an annual quantity of 13,000-14,000 tons of dehydrated sludge and Aquarno 20,000 tons*" (page 44), **UNIC wrote:** «Incorrect data».

Answer:

Data concerning Cuoiodepur have been given directly by Cuoiodepur. Data concerning Aquarno was estimated on the base of confrontation with similar purification plants. This method was adopted as a result of the inability to obtain information directly from operators.

In relation to the following excerpt: "*The plant (SGS ndr) treats approximately 100,000 tonnes of material each year, brought in directly by tanneries, from which it extracts fats and proteins resold in the form of products for agriculture and livestock farming*" (page 45), **UNIC wrote:** «Incorrect data».

Answer:

The number was calculated from data published by the company on its own web site in june 2015: "the plant works up to 400 tons per day of raw material", which translated to a yearly basis gives more than 100.000 tons.

In relation to the following excerpt: "*The risk of mutation into hexavalent chromium increases with the quantity of trivalent chromium remaining unbound from within the skin*" (box page 42), **UNIC wrote:** «Wrong data, scientifically incorrect and misleading».

Answer:

We know the most appropriated term is "oxidation", but we preferred not to use it, for fear of not being understood by the general public.

Regarding the risk being linked to unbound chromium III, this is stated by many sources. In his paper "*Forever young – avoiding ageing in leather?"*[2], Ivo Reetz, chemichal working at Pulcra Chemicals GmbH, writes: "Many investigations have proven that there is a relation of unbound CrIII and the proneness to CrVI formation [3,6]. The complex bonds of CrIII with collagen are obviously too strong so as to be opened in the course of oxidation processes."

Furthermore the International Union of Leather Technologists and Chemist Societies states the following: «Once the chrome is fixed to the fibre, the availability of it for the equilibrium of Cr(III) and Cr(VI) is dramatically reduced. Only the extractable part of Cr(III) in leather is fully available for the equilibrium. » (pag 3 of the article published on August 2013 by Dr. Dietrich Tegtmeyer, Chairman IUR, IULTCS, Dr. Martin Kleban, TEGEWA Working Group Tanning Chemicals, under the title *"Chromium and Leather Research A balanced view of scientific facts and figures")*

A similar statement comes from Leather International 5 March 2001, (*How to avoid Cr (VI) formation in leathers?*): «It is clearly seen that chrome retanning leads to very high Cr (VI) concentrations while leathers without chromium retanning show negative results. This result suggests that the presence of free Cr (III) could favour the formation of Cr (VI) since a large amount of the main reactant in the oxidation reaction remains unfixed.»

3. ANSWERS ABOUT INFOGRAPHICS "DID YOU KNOW THERE'S A COW IN YOUR SHOES?"

SLIDE 1

UNIC wrote: «"20% of the carcass value of the animal is obtained selling the hide". Incorrect data. The average value of hides is significantly lower than 20%. Even if it were 20%, this is not enough to justify the slaughtering of animals to produce hides. Therefore, the two reports are also contradicting».

Answer:

The information is given by Daisy Tarrier, president of the French NGO *Envol Vert*, as quoted in the article by Rachida Boughriet, "Cuir et déforestation amazonienne: l'industrie de la chaussure pointée", *Actu Environment*, 11 mars 2013[3]. The entire paragraph sounds as follows:

«L'Amazonie qui possède 10% des espèces connues au monde perd ses forêts "principalement à moins de 50 km des principales autoroutes brésiliennes suite aux feux de forêt déclenchés pour laisser place aux pâturages bovins", a expliqué le 7 mars Daisy Tarrier, présidente d'Envol Vert, à l'occasion d'une conférence de presse. Ces bovins "abattus pour notre consommation ont besoin de presque un hectare en moyenne par tête de bétail". *Le cuir issu de leur peau "représente un revenu indispensable pour les fermes avec 20% de la valeur moyenne d'un boeuf*". Issu du tannage de ces peaux, le cuir a par conséquent un impact via sa vente" lucrative" comme sous-produit de l'industrie de la viande bovine, et soutenue par la forte demande en articles de cuir, souligne l'association».

The reference to the value of skin is not aimed at arguing that the primary objective of slaughtering is skin, but that skin is an important element of revenue. This position is supported by the fact that

[2] http://www.pulcra-chemicals.com/fileadmin/user_upload/Forever_young__avoiding_ageing_in_leather.pdf

[3] http://www.actu-environnement.com/ae/news/cuir-deforestation-envol-vert-greenpeace-FFC-eram-tannage-chrome-vegetal-alternatives-18019.php4

the report edited by FAO, "Tackling Climate Change Through Livestock. A Global Assessment of Emissions and Mitigation Opportunities", Rome 2013, indicates skin as a co-product of dairy production, with milk, meat and manure (page xix).
However a revision according to price trends will be considered.

SLIDE 2
UNIC wrote: «Box – The indication of meat properties and alternative food, suggesting the limitation of meat consumption for health, environmental and equity reasons is completely out of the scope of the project».
Answer:
It is not up to UNIC to establish what is or is not coherent with the scope of the project. Since the general aim of the project is to stimulate consumers to responsible behaviours, information about sustainable nutrition is perfectly coherent.

SLIDE 3
UNIC wrote: «To produce a kilo of raw hides or skins, 17,1 mc of water are required". Data not scientifically supported».
Answer:
The number is calculated on data given by Mesfin Mergia Mekkonen and Arien Y. Hoekstra, in the report "The green, blue and grey water footprint of farm animals and animal products. Volume 1: Main report", edited by UNESCO-IHE, Institute for Water Education (*Value of Water Research Report Series No. 48*, December 2010). The exact data is 17,093 mc of water / ton, composed by 15,916 mc of green water / ton, 679 mc of blue water / ton, and 498 mc of grey water / ton.

SLIDE 4
UNIC wrote: «It describes the situation of Brazil and refers to the Greenpeace report of 2009 on deforestation. Wrong information, the report has been disproved and the main company involved won a lawsuit against Greenpeace for the defamatory and false information of that report».
Answer:
There is no mention in slide 4 about the 2009 Greenpeace report on deforestation. Furthermore, to our knowledge Greenpace has never gone on trial for its report. If UNIC refers to JBS' intention to sue Greenpeace, it should be noted that according to Reuters, 19 December 2012, JBS withdrew the lawsuit and renewed a promise not to purchase cattle from restricted areas in Brazil.

SLIDE 4
UNIC wrote: «The calculation of emissions to state that farming has a high environmental impact and the statement that this impact should be considered as part of the environmental impact of leather have no scientific base».
Answer:
The data (14.5%) is repeatedly indicated by FAO in the report "Tackling Climate Change Through Livestock. A Global Assessment of Emissions and Mitigation Opportunities", FAO, Rome 2013[4] (page xii, page 14 and page 15). For example, we can read at page 14: «With emissions estimated at 7.1 gigatonnes CO2-eq per annum, representing 14.5 percent of human-induced GHG emissions, the livestock sector plays an important role in climate change».

[4] http://www.fao.org/3/i3437e.pdf

SLIDE 5

UNIC wrote: «It is not true that one of the two biggest tanneries in Italy has been mentioned as one of the main buyers of raw hides coming from animals farmed in the Amazon deforestation areas. Not even Greenpeace, in the mentioned report, hazards to make such a false accusation».

Answer:

In the report "Slaughtering the Amazon", published in July 2009 by Greenpeace International (The Netherlands)[5], Rino Mastrotto Group (RMG) and Gruppo Mastrotto (GM) are cited several times as Bertin's customers. For instance at page iv we can read: «The two leading Italian leather processors, Rino Mastrotto Group (RMG) and Gruppo Mastrotto (GM), receive regular supplies of leather from Bertin». At pag. iii about Bertin it is stated: «Greenpeace undercover investigations have unpicked the complex global trade in beef products from part-Brazilian-government-owned corporations – Bertin, JBS and Marfrig. Greenpeace has identified hundreds of ranches within the Amazon rainforest supplying cattle to slaughterhouses in the Amazon region belonging to these companies. Where Greenpeace was able to obtain mapped boundaries for ranches, satellite analysis reveals that significant supplies of cattle come from ranches active in recent and illegal deforestation. Trade data also reveal trade with ranches using modern-day slavery. Additionally, one Bertin slaughterhouse receives supplies of cattle from an illegal ranch occupying Indian Lands».

It should also be noted that on the web site of BLC Technology Solutions LLP (a sister company of BLC Leather Technology Centre Limited based in Northampton, UK, with over 90 years' experience in material and product testing for leather industry), an important statement is given about the Greenpeace report: «Through this campaign, Greenpeace leveraged change by targeting brands that use Brazilian beef or leather in their products; the major successes came when Greenpeace targeted global footwear brands who then in turn raised awareness of the issue within the supply chain through their involvement with the Leather Working Group (LWG)»[6].

SLIDE 8

UNIC wrote: «Incorrect and defamatory. It is not true that employment of immigrants is high because it is a hard and uncomfortable job. Immigrants, who normally do not have a specialization, are employed in those functions of the tanning process, which do not require any specialized work. This is a normal phenomenon in the job market; there is no racism rationale, as the authors of the report imply, indicating an analogy with the Italian migration from the southern regions during the '60s».

Answer:

The functions of the tanning process which do not require any specialized skill are generally the harder and more uncomfortable one. And harder works are usually fulfiled by the most precarious people. Southeners in the '60s entered in the labour market as unskilled workers, as nowadays do immigrants. The report only describes a sociological reality, in no way it alludes to racism rationale.

SLIDE 12

UNIC wrote: «To treat a ton of raw hides or skins, 950-1230 kg of solid wastes are produced". Incorrect data».

Answer:

The data (950-1230 kg) is based on the Joint Research Center Reference Report edited by the

[5] http://www.greenpeace.org/international/en/publications/reports/slaughtering-the-amazon/

[6] http://www.leathersustainability.com/managing-ngo-activity-and-engagement/understanding-campaigns-of-importance/slaughtering-the-amazon/

European Commission, Institute for prospective technological studies: "Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins. Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control)", Report EUR 26130 EN, by Michael Black, Michele Canova, Stefan Rydin, Bianca Maria Scalet, Serge Roudier, Luis Delgado Sancho (Luxembourg: Publications Office of the European Union, 2013). In particular we've worked on Figure 3.1 "Input/output overview for a conventional (chrome-tanning) process for bovine salted hides per tonne of raw hide treated" (page 35). The final data is the result of the sum of two different outputs: 450-730 kg of solid process residues and 500 kg of sludge from waste water treatment at 40% of dry matter content.

SLIDE 13

UNIC wrote: «The assertions reporting solid wastes, dirty water and polluting gases are general and do not represent the Italian tanneries' environmental impact».

Answer:

The assertions refer to general risks in tanning industries, but also to specific events occurred in the Santa Croce District. The aim is to raise awareness of the reader on the environmental impact of such activities.

SLIDE 15

UNIC wrote: "*The risk of mutation into hexavalent chromium increases with the quantity of trivalent chromium remaining unbound from within the skin*". «Data are wrong, scientifically incorrect and misleading».

Answer:

See answer given at page 11 to the same criticism.

SLIDE 16

UNIC wrote: «From the ecological point of view, the law of the jungle was in force."

Incorrect and defamatory. At the time the report refers, there was no legislation in force as regards reduction of environmental impact. The report suggest instead that Italian tanners did not comply with rules».

Answer:

It's a wrong interpretation, which misleads the real meaning of the sentence. The expression "law of the jungle" wants to suggest precisely the lack of a legislation in force, not the lack of respect of the law. In fact, the reference to the "jungle" is to be meant as an ideal natural context where no human law is in force.

SLIDE 17

UNIC wrote: «The data reported are incoherent with the previous ones».

Answer:

The data in slide 17 are related to the production of a pair of leather boots, while the data in slide 16 are related to the chromium-based tanning of 1 kilo of skin. They refer to very different processes: then, in this case, no coherence is needed.

Pisa 21st march 2016