



# Public Stakeholder Consultation on the Draft Common Framework for Responsible Purchasing Practices

## Summary document

The Common Framework for Responsible Purchasing Practices (CFRPP) (the framework) seeks to be a reference point on what constitutes 'responsible purchasing practices', to align and gain consensus on the language and terms used, to aid implementation by companies and use by policymakers. To this end, the MSI Working Group on Responsible Purchasing Practices<sup>1</sup>, which has collaborated to draft the framework, held a public consultation from Q4 2021 to Q1 2022 to receive feedback on the draft framework in terms of language, scope and purpose with relevant stakeholders.

The MSI Working Group has received detailed feedback on the draft framework from 34 organisations, (including the stakeholder groups shown in Graphic 1 below), and has carefully evaluated and integrated the feedback. The MSI Working Group further requested the framework to be checked by a competition law expert and the recommended changes have been integrated. The updated framework can be downloaded [here](#).

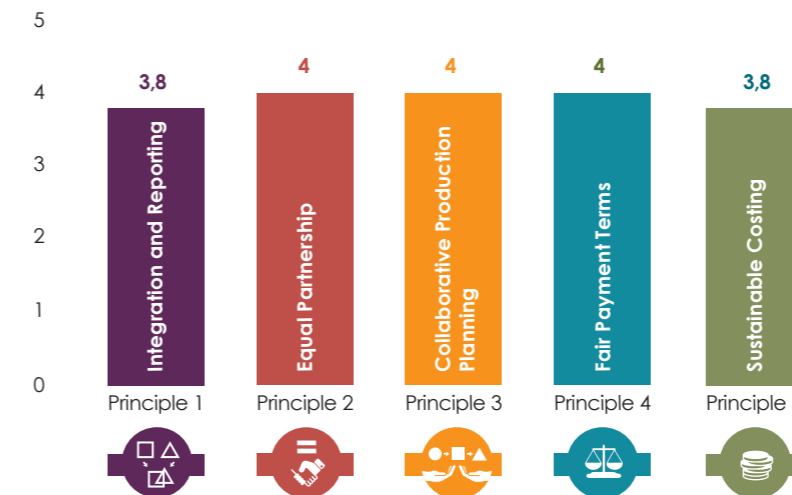
Across the framework's 5 key principles, stakeholders were asked to indicate how well they felt the text described Responsible Purchasing Practices (RPP) in each area, i.e.

whether it was an accurate and complete reflection. In general, the results point to a shared understanding of what constitutes RPP as stated in the draft framework, particularly relating to Principle 2 (Equal Partnerships), Principle 3 (Collaborative Planning and Forecasting), and Principle 4 (Fair Payment Terms) (Graphic 2). Moreover, a significant proportion of relevant corporate 1 The MSI Working Group on Purchasing Practices includes representatives from Fair Wear, ETI, Ethical Trade Norway, PST/GIZ, AGT/NGA. stakeholders indicated that they felt the practices were appropriate for the business model/size they represent (52%) or that this was partially so (44%) (Graphic 3).



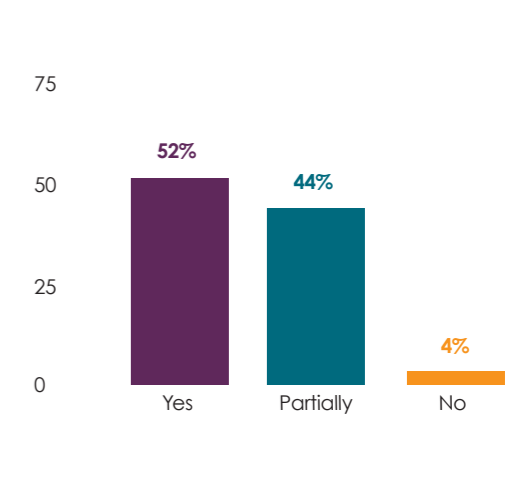
**Graphic 2: RPP per principle**

Do you think this section accurately describes responsible purchasing practices in this area? (1=no, 5=yes it covers it well)

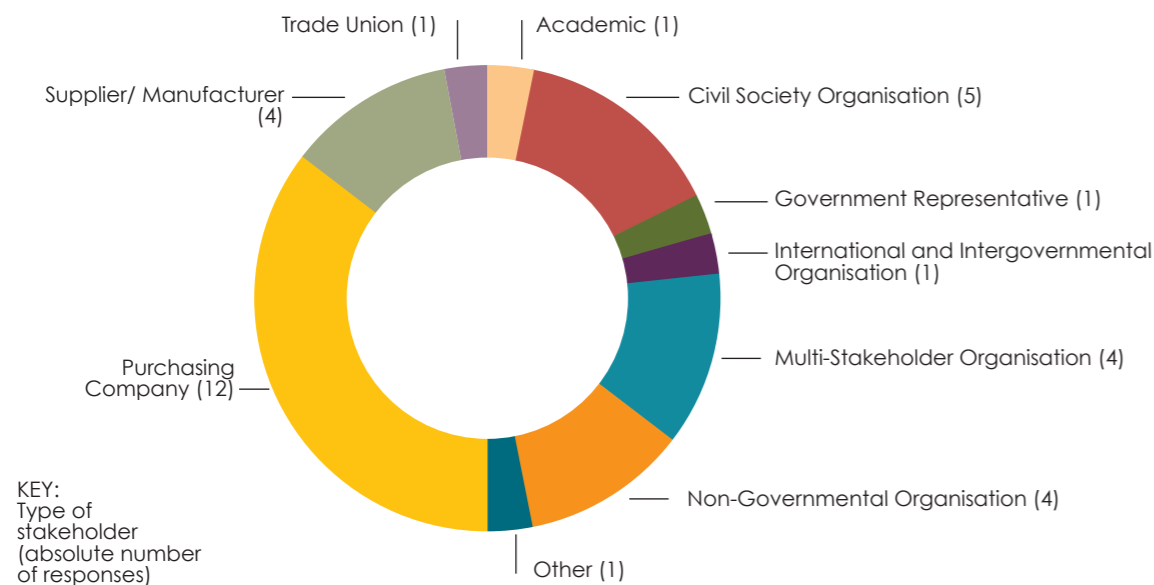


**Graphic 3: Business appropriateness**

Are the practices / lines appropriate for the business model / size you represent?



**Graphic 1: Feedback per stakeholder group**



KEY:  
Type of stakeholder (absolute number of responses)



**The MSI Working Group would like to thank everyone who took the time to give feedback on the draft framework, which has helped to make the document stronger.**

<sup>1</sup> The MSI Working Group on Purchasing Practices includes representatives from Fair Wear, ETI, Ethical Trade Norway, PST/GIZ, AGT/NGA.

## Feedback from different groups of stakeholders

Under each group of stakeholders, this section summarises briefly the main points of feedback received and how those have been integrated into the updated framework.

All the feedback was carefully considered and discussed by the MSI Working Group, and incorporated where appropriate, especially where feedback on a practice was received repeatedly and from various stakeholder groups. At times, opposing feedback was given as Civil Society, Non-Governmental Organisations (NGOs) and Trade Unions suggested a more challenging element to a practice, where companies' feedback on the same practice was that the draft practice was already too ambitious. On multiple points like this, the MSI Working Group has decided on a compromise in between the two sets of opinions.

The majority of the practices/lines in the framework have been amended in some way based on the feedback. Examples of how the feedback was integrated into the updated framework are mentioned below.

### Civil Society, Non-Governmental Organisations and Trade Unions

Civil Society, Non-Governmental Organisations and Trade Unions have pointed to the perceived lack of workers' involvement in some practices of the draft framework. The MSI Working Group welcomed these contributions and has included more specific provisions for worker/ worker representative involvement in Principles 1 (Integration and Reporting), 2 (Equal Partnership) and 5 (Sustainable Costing). These amendments now make explicit the importance of worker/ worker representative involvement in a number of key activities/practices including when tracking progress on mitigating negative impacts (Practice 1.14), in the communication of commitments to RPP and labour rights (Practice 2.1) and when taking action to close the living wage gap (Practice 5.7).

The importance of workers' involvement is currently developing and evolving in the context of purchasing practices. The feedback received detailed a few ambitious practices around worker involvement which are currently not common practice amongst purchasing companies.



The updated framework includes commitments to involve workers and worker representatives wherever it was seen to be feasible. This topic will continue to be re-evaluated and the MSI Working Group welcomes this feedback and acknowledges that worker involvement is a key topic for responsible purchasing practices.

In an effort towards stable and long-term business relationships, based on feedback received from this stakeholder group, provisions for purchasing companies to support suppliers to achieve social and environmental standards have been more explicitly specified (Practice 2.1).

NGOs recommended that there be more specific mention of Living Wages throughout the framework, and this has been incorporated in a number of places (e.g., Practice 1.12). However, feedback was also received from other stakeholders that this one issue was featured too heavily at the expense of other issues, so it wasn't included in all places suggested.

Some NGOs expressed concern that a voluntary framework might delay or hinder their calls for regulation. The MSI Working Group has expressly stated in the introduction of the updated framework that various streams of activity and efforts are valuable and complementary to work towards the shared goal of implementing responsible purchasing practices and that it does not oppose regulatory measures nor does the framework nullify the need for that.

Civil Society and Non-Governmental Organisations recommended an increase in the mention of the Human Rights and Environmental Due Diligence (HREDD) process, how purchasing practices fit within that and to ensure that it is clear that the processes are iterative and ongoing. This was helpful feedback and has been integrated (e.g. in the introduction and Practices 1.3, 1.8 and 1.14, amongst others), although the MSI Working Group has been clear to specify that the framework has a specific focus on purchasing practices and does not attempt to cover the full scope of HREDD.

### Purchasing companies

Purchasing companies made useful recommendations especially relating to the clarification of language within the framework. As a result of taking on board this feedback, the updated framework gives a more precise description of concepts and timelines in some practices (e.g., Practices 3.4, 3.5, 4.2 and 5.6). For example, purchasing companies requested clarification on the benchmarks to be used for Living Wages (in Principle 5: Sustainable Costing), which have now been specified and integrated into the framework.

Some purchasing companies pointed to specific practices in the draft framework that they felt would not fit their business model. The Principles are agreed as essential building blocks of RPP. The Practices/lines listed under each Principle are a collation of existing materials to outline what good practice looks like in terms of action steps companies can take to implement those Principles. Some of the Practices/lines in the framework will be more or less applicable to different business models and sizes. The MSI Working Group encourages companies to take constructive action steps towards the Principles, using the Practices as a guide, focusing on where they have identified greatest risk of negative impacts and where they can get traction to make change.

Some purchasing companies mentioned that a handful of the practices could potentially interfere with their commercial practices. As purchasing practices significantly influence labour conditions, they constitute a cross-cutting issue. Whilst the MSI Working Group acknowledges challenges linked



to the adaptation of commercial practices, gaining internal buy-in, including securing top management commitment and raising awareness across departments, is in itself part of the journey towards RPP.

### Suppliers

From a supplier perspective, [The Sustainable Terms of Trade Initiative \(STTI\)](#) encouraged the framework to align more closely with their White Paper on Commercial Compliance.

The Framework includes a significant majority of the recommendations by the STTI and the updated version further incorporates language and concepts as defined in the White Paper (e.g., the new Practice on audits in 2.13 and including re-processing in Practice 4.6 in order to limit potential forms of penalties). However, there are some specific points where the exact text hasn't been taken on board, because of specific opposing feedback from other stakeholders. For example, in Practice 5.8 (Ring-fencing labour costs), where the STTI recommended a ceasing of the practice of requesting 'open-books' from suppliers (until further research has been carried out), the MSI Working Group considers transparency of labour costs, so they can be ring-fenced, as an important element of achieving living wages. This practice is given as one way of closing the wage gap and the Practice text specifies how this needs to be safeguarded, so as not to drive down costs, acknowledging the concern of the STTI and others.

### OECD

Feedback from the OECD to further align language with the [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#), was largely incorporated into the updated framework.

### Moving Forward

In an attempt to keep the content of the framework concise, more detailed feedback and recommendations will be considered for inclusion in guidance documents rather than in the framework itself. As the 'Learning and Implementation Community' progresses, the MSI Working Group is open to amending the framework, based on the learnings of that group.



[Please find the updated framework here](#)