



Animal Welfare.
Worldwide.

BEHIND THE WOOL

Transparency on
Live Lamb Cutting
in Fashion



IMPRINT

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About: FOUR PAWS is a global animal welfare organisation that has worked to improve the lives of animals used in fashion for over 35 years. Through its Wear It Kind programme, FOUR PAWS advocates for higher welfare standards across the textile industry by driving evidence-based policy, supporting the development of standards, and running impactful public campaigns. The organisation focuses on ending some of the industry's most severe cruelty issues, including the use of fur, live lamb cutting (mulesing) and live feather plucking. As a critical friend to the fashion sector, FOUR PAWS engages across the entire supply chain – from consumers to brands to farmers – promoting systemic change for animals.

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Disclaimer: The Transparency Report is an independent FOUR PAWS publication. It provides a snapshot assessment of selected fashion brands' transparency on live lamb cut (mulesed) wool, based on publicly available information and direct engagement up to a set deadline. While we strive for accuracy, FOUR PAWS makes no guarantees regarding the completeness, correctness, or timeliness of the information. Use of this report is at the user's own risk. FOUR PAWS accepts no liability for any actions taken based on its content. Links to external websites are provided for convenience only. FOUR PAWS is not responsible for their content or accuracy.

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Executive Summary

This report spotlights sheep wool – the fashion industry’s most widely used animal fibre – and exposes its most urgent welfare issue: live lamb cutting (also known as mulesing). Over half of the wool used in global fashion comes from Australian sheep subjected to live lamb cutting (LLC). This outdated and painful mutilation practice, carried out to reduce the risk of flystrike, involves restraining young lambs, usually 2–12 weeks of age, on their backs while an area of skin bigger than the palm of a hand is cut off their hindquarters. Despite the availability of proven alternatives, live lamb cutting continues to cause immense suffering to over 10 million lambs every year.

With awareness of animal welfare in fashion growing and 80% of surveyed people wanting brands to exclude live lamb cutting once they know what it is,¹ are fashion brands being transparent enough to support consumers to make this choice?

To find out, FOUR PAWS investigated over 100 fashion brands across market segments including outdoor, fast fashion and luxury in Australia, Austria, Bulgaria, France, Germany, New Zealand, South Africa, Switzerland, the Netherlands, the UK and the US. The assessment of brand transparency on LLC used only information accessible to the public, including sourcing policies, online and in-store product details.

Transparency gaps despite clear market signal

While this report exposes a significant transparency gap, with more than two-thirds (67%) of brands failing to provide clear and consistent public information on live lamb cutting, including wool sourcing policies and product labelling, it also reveals that many brands are actively distancing themselves from this cruelty. A strong majority (84%) opposes the practice, with 58% having already started to use, or only using, live lamb cut-free wool.

67% of brands fail to provide clear and consistent public information on live lamb cutting

The biggest transparency gap was found where it matters most for consumers – at the point of sale. While 65% of brands say they seek robust wool certification, understanding its value to mitigate LLC, only 39% share these certifications at the product level to support evidence-based claims, leaving consumers largely without the assurance they need.

65%

of examined brands claim to seek robust wool certification.

Only 39%

share these certifications at the point of sale.

Signs of progress

25%

of reviewed brands improved transparency immediately by strengthening their policies or product labelling, or joined collective action as a direct result of the investigation.

17%

pledged to take further action to ensure better transparency signalling a growing industry consensus: live lamb cutting has no place in modern fashion.

This includes **14 brands that have signed an open letter** urging the Australian wool industry to **end LLC by 2030**, joining a **global movement of over 140 brands**.

Leaders & laggards



Transparency leaders

Arcteryx, COS, Ortovox, Patagonia and Tchibo exclusively source certified LLC-free wool and provide shoppers with clear product disclosure.



Worst laggard

Michael Kors scores 0 points – no policy, no product disclosure, no response, no transparency.



Biggest improvers

Bulgarian brands Junona, Teodor and DiKa moved from red to green in our scoring system by clearly stating they source only certified LLC-free wool, both in policy and online product labels.

To safeguard lambs and consumer trust, FOUR PAWS urges brands to commit to using only LLC-free wool, certified to robust standards with full traceability and product transparency.

This report serves as both a wake-up call for the fashion industry and a practical tool for change, offering brand-specific advice and shopper guidance on LLC-free fashion.

Introduction



With consumers demanding higher animal welfare standards, fashion brands are making them an ever-greater priority. Transparency in fashion is no longer optional. Shoppers today increasingly want to know not just what their clothes are made of, but how they are made, and at what cost to animals, people and the planet.

A global online poll commissioned by FOUR PAWS and conducted by YouGov in 2024 surveyed nearly 11,000 adults across twelve markets and revealed that nearly two-thirds (65%) are aware of animal cruelty issues in the fashion industry. Additionally, over half (53%) say fashion brands should be transparent about their animal welfare standards.¹

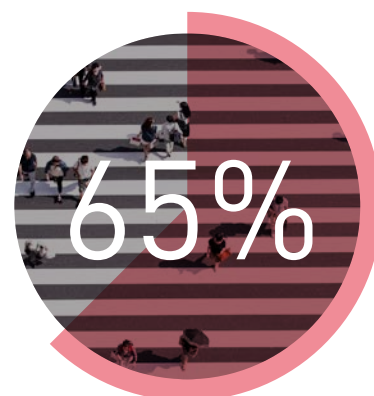
Evolving textile labelling regulations and global policy frameworks reflect growing consumer demand for honesty and accountability. Brands are under increasing pressure to set meaningful targets and back up their sustainability claims with clear, evidence-based information. While there is no commonly agreed definition of “sustainable fashion”, it holistically includes animal welfare, alongside environmental protection and workers’ rights.

Animal welfare is now formally recognised by the Organisation for Economic Co-operation and Development (OECD) as a requirement for responsible business conduct,² and has been identified by the United Nations as key to achieving many Sustainable Development Goals.³

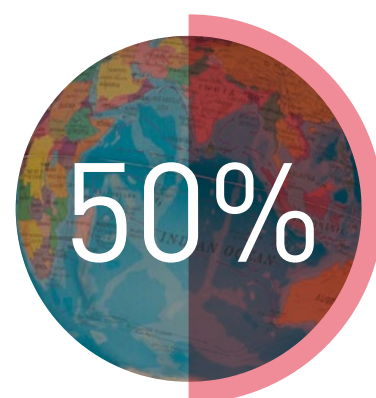
One of the most urgent and overlooked animal welfare issues in fashion is the Australian wool industry’s continued use of the cruel and outdated practice of live lamb cutting (LLC), also known as mulesing.

Despite the availability of viable industry-proven alternatives, many producers continue to use this brutal practice that is proven to cause excruciating pain to millions of lambs every year. This report sheds light on how fashion brands are (or aren’t) addressing this issue, and why transparency is key to driving change.

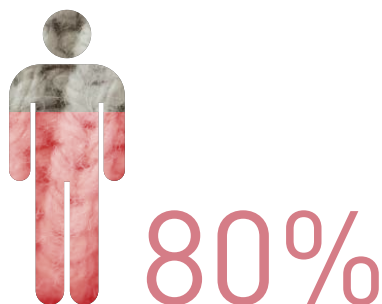
Wool is the most widely used animal fibre in fashion,⁴ and while several countries contribute to global wool production, Australia dominates the market, producing 80% of fine wool for apparel.⁵ Alarmingly, less than 20% of Australian wool is declared as free from live lamb cutting⁶ – meaning that over half of the wool used in global fashion likely comes from lambs subjected to this painful practice.



Two-thirds (65%) of adults are aware of animal cruelty issues in the fashion industry.



Over half of the wool used in fashion globally is live lamb cut wool from Australia.



want brands to remove live lamb cutting from their supply chains.

This is not a distant issue. It is woven into the fabric of global fashion. Without strong standards, it's near impossible to mitigate the high risk of unknowingly selling wool sourced from sheep who have suffered live lamb cutting. This is a global problem – harming around 10 million lambs every year – and it's one we can all contribute to solving.⁷

After learning about the practice of live lamb cutting in Australia, and the availability of pain-free alternatives, four in five adults (80%) globally agree that retailers sourcing wool should phase out their use of LLC wool, with 62% strongly agreeing.¹ This statistic underscores a critical truth: **people care, but they need to know.**

Brands must take responsibility for the animals in their supply chains. They must be clear about their sourcing practices and provide consumers with the information they need to make cruelty-free choices. Transparency is the foundation of ethical fashion – it enables scrutiny, drives accountability and leads to improvement.

When brands fail to disclose their sourcing practices, they rob consumers of the ability to align their purchases with their values.

Live lamb cutting: A cruel legacy in wool production

The cruelty of live lamb cutting

The highly controversial practice of live lamb cutting is a painful procedure only practised in Australia's wool industry. It involves separating young lambs, usually 2–12 weeks of age, from their mothers and restraining them on their backs in a metal cradle. Shears similar to garden shears are then used to cut away an area of skin bigger than the palm of a hand from around the lamb's tail, anus and vulva in female lambs – without adequate pain relief.⁸ The resulting fear, stress and excruciating pain can last for days, or longer, and wounds can take weeks to heal.⁹⁻¹² Many don't survive, succumbing to the consequences of this severe mutilation.¹³



sheep for excess skin, and it can be solved the same way: by selectively breeding for plain-bodied sheep. This is not a new solution; the wool industry has known about it for decades. The approach became better understood in the 1990s through the work of veterinarian Dr Jim Watts,²⁴ and has been successfully implemented by thousands of wool producers since then. A survey of nearly 100 wool producers from a broad range of climatic and geographical zones in Australia noted that transitioning to plain-bodied flocks is feasible within two to five years, improves lamb survival and growth rates as well as overall welfare, and is economically viable.²⁵

Yet, progress is slow. An estimated 80% of Australian wool still comes from sheep that have suffered live lamb cutting, with transition rates as low as 1–3% per year.^{6,26} At this pace, it could take another 40 years to phase out the practice.

The global market is growing impatient. At the International Wool Textile Organisation Congress in May 2025, Jiang Yali, Director of the Nanjing Wool Market, announced that China – Australia’s largest wool buyer, accounting for 85% of exports – now favours South African wool due to the availability of Responsible Wool Standard-certified, live lamb cut-free wool.^{27,28}

Although South Africa doesn’t practise live lamb cutting, without strong certification systems ensuring full traceability, the complex global wool supply chain can lead to LLC-free and LLC wool being mixed. Over 1.2 billion sheep are used in the textiles industry each year,²⁹ and, with less than 5% of wool certified to welfare standards, most are left unprotected.³⁰

Transparency and why it matters

Transparency is the cornerstone of ethical fashion. Without it, consumers cannot make informed choices, brands cannot be held accountable, and systemic issues like live lamb cutting remain hidden behind polished marketing campaigns. When brands publicly commit to sourcing only certified, live lamb cut-free wool, they are taking a positive step



forward for both animals and consumers.

Brands have a responsibility to know where their wool comes from and how the animals in their supply chains are treated. They must move beyond generic animal welfare statements and adopt certified, traceable and transparent sourcing standards. Brand transparency as a driver of change

Over 340 fashion brands have already made strong commitments to exclude live lamb cutting from their supply chains through robust certifications, independent audits and full traceability, sending a clear market signal for a shift away from live lamb cut wool and the risk of inadvertently using it.³¹ More than 140 global brands have gone the extra mile to sign the FOUR PAWS Brand Letter of Intent, urging the Australian wool industry to end the practice by 2030.³² Public and brand pressure is a powerful force for change: it prompted the Australian wool industry to commit to phasing out live lamb cutting back in 2004. Although the industry controversially abandoned its commitment, market demand remains a key reason many Australian wool producers are voluntarily stopping the practice.

With several certifications available and all major wool suppliers capable of providing verified live lamb cut-free wool, brands have the tools they need to commit to not using LLC wool. The time for silence is over – without transparent sourcing policies and clear product labelling, brands are complicit in leaving consumers in the dark, and lambs at risk of immense suffering.

The power of informed consumers

Honest and credible product labelling isn't just good ethics, it's smart business. A new impact report from Amazon highlights the positive influence of sustainability labelling on consumer behaviour. Products that joined the Climate Pledge Friendly (CPF) programme saw a 13.3% increase in gross merchandise sales, a 12.5% rise in unit sales, and a 4.4% boost in shipped units within just 12 weeks of joining.³³ Transparency and credible sustainability claims can significantly influence purchasing decisions. Brands that align with societal values and communicate clearly and credibly will be the ones that earn consumer trust and thrive.



fashion brands made strong commitments to exclude live lamb cutting.



fashion brands have signed an open letter urging Australia to end the practice by 2030.

However, as conscious consumerism continues to grow, so does the rise of misleading marketing – often referred to as “greenwashing” or “welfare-washing” – where companies exaggerate or falsely claim ethical practices. At the same time, the opposite trend, known as “greenhushing”, is also gaining traction, with brands staying silent about their sustainability efforts to avoid scrutiny. In both cases, the result is the same: consumers are misled, and harmful practices continue unchecked.

A crisis of trust in fashion

A 2024 study by Fashion Takes Action highlights growing erosion of consumer trust in the fashion industry. The results highlight the reputational and financial risks for brands that mislead consumers:



79%
of consumers
are frustrated by
greenwashing



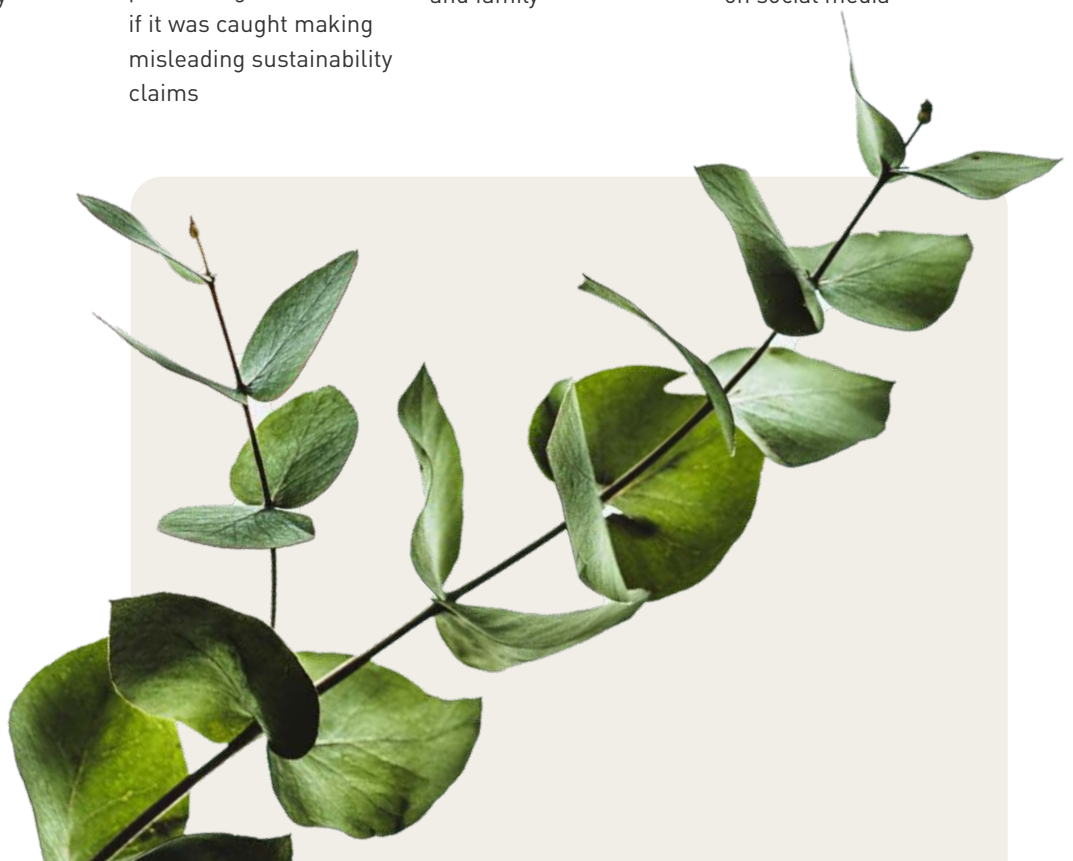
64%
said they would stop
purchasing from a brand
if it was caught making
misleading sustainability
claims



25%
would warn friends
and family



17%
would share concerns
on social media³⁴



A consumer survey conducted across the US and Canada in 2025 found that nearly 49% of consumers abandon products due to confusing sustainability claims. That figure rises to 87% among highly conscious shoppers. Additionally, 55% of respondents said they are likely to change their buying habits for ethical or social reasons within the next year, a trend already reflected in ongoing boycotts across North America.³⁵

This growing mistrust is echoed globally. In April 2025, consumer protection authorities from over 20 countries issued an open letter to the fashion industry, warning against misleading environmental claims and urging compliance with consumer protection laws.³⁶ The letter, coordinated by the International Consumer Protection and Enforcement Network (ICPEN), signals a global shift towards stricter oversight and accountability.

Global crackdown on misleading marketing

Media exposure of greenwashing has surged, from around 300 articles annually a decade ago to over 2,000 in 2021.³⁷ In response, governments worldwide are tightening rules to protect consumers from deceptive marketing claims and ensure fair competition. These rules are designed to ensure that brands can prove what they claim.

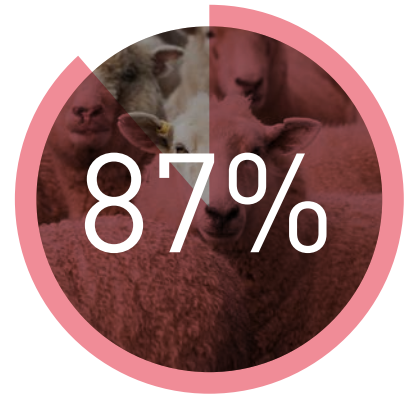
The once “grey area” is increasingly regulated by strengthened consumer protection laws in major apparel markets including the EU, US, UK, Canada and Australia, where misleading or unsubstantiated claims can now lead to serious consequences.

Fashion brands under fire

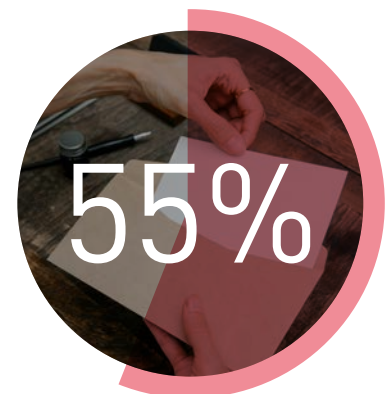
Recent cases show regulators mean business:

- ▶ **Netherlands:** The Authority for Consumers and Markets (ACM) investigated 70 fashion brands over vague green claims, giving companies six weeks to comply or face penalties. H&M and Decathlon responded by dropping unclear labels including Conscious and Ecodesign, and pledged donations of up to EUR 500,000 to environmental causes.³⁸
- ▶ **North America:** The US Federal Trade Commission’s (FTC) Green Guides outline which types of product claims are considered deceptive and may result in fines.³⁹ Canada’s Bill C-59,⁴⁰ passed in June 2024, requires sustainability claims to be backed by

Nearly 49% of consumers abandon products due to vague claims – a figure that rises to



for highly conscious shoppers.



are likely to change their buying habits for ethical or social reasons.



recognised scientific methods, with fines of up to USD 10 million.^{41,42} Lululemon faced lawsuits in the US⁴³ and an investigation in Canada⁴⁴ for greenwashing after its “Be Planet” campaign claimed sustainability while its emissions had doubled.

- ➔ **Australia:** The Australian Competition and Consumer Commission (ACCC) fined Clorox AUD 8.25 million for falsely marketing GLAD bags as made from recycled ocean plastic.⁴⁵
- ➔ **European Union:** Laws such as the Unfair Commercial Practices Directive (UCPD) and the Empowering Consumers for the Green Transition Directive (ECGTD 2024/825) have resulted in legal action.⁴⁶ Hunkemöller,⁴⁷ for example, was sued for misleading advertising of sustainable cotton products, when in fact they were mixed with mostly conventionally produced cotton. Similarly, Adidas faced legal action over unsubstantiated claims of becoming “climate neutral by 2025” without providing a credible plan for how this would be achieved.⁴⁸

Claims and EU legislation

While enforcement is rising globally, the detailed and demanding requirements of the legislative framework from the EU Green Deal set a benchmark often used by other jurisdictions. The EU sets a high bar, and brands that meet its requirements are likely well positioned globally and better prepared for the regulatory direction in which other markets are moving. EU law specifies that:



Animal welfare claims, including “mulesing-free”, are considered part of a product’s social characteristics under recital 3 of the ECGTD. False or untruthful information regarding these claims is considered an unfair practice and, therefore, banned.^{49,50}



Any “mulesing-free” label or logo created by a brand (rather than a public authority) falls under the EU definition of a sustainability label in Article 2(q). This means third-party verification must be provided; otherwise, the brand risks violating EU law.⁴⁶



If the claim implies an environmental benefit, e.g. “responsibly sourced”, it is also considered an environmental claim as per Article 2(o) of the UCPD, requiring brands to disclose any information used to support that claim, including details of the traceability or assurance scheme used. This information must be provided on the same medium where the claim is used.⁴⁶

Claims must be truthful, specific and evidence-based. If brands make comparisons, they must be fair and meaningful, and all claims must be verifiable, ideally through third-party certifications and strong internal systems.

What this means for live lamb cutting claims

To avoid legal risks and be genuinely transparent, brands must move beyond vague buzzwords. Terms such as “animal-conscious wool” or “ethically sourced” don’t measure up, and brands that rely on vague claims that aren’t backed by solid evidence risk losing consumer trust and facing legal consequences. To comply with the most stringent regulations and earn customer trust, brands should:



Adopt a clear, measurable policy to fully exclude live lamb cut wool by a specified date



Commit to using only robust, third-party-certified LLC-free wool (see guidance for brands below)



Provide third-party verification information for LLC-free wool on physical product labels, and within online product information – ideally also linking to their policy.



Methodology



Purpose

This report examines current brand behaviour on transparency around LLC in wool supply chains, offers brands guidance for improvement, and equips consumers with the information they need to avoid LLC wool when shopping and identify brands committed to ending LLC.

During the investigation, we engaged with brands to encourage stronger policy commitments and product disclosure.

Scope

For this report, FOUR PAWS assessed 102 fashion brands across Australia, Austria, Bulgaria, France, Germany, New Zealand, South Africa, Switzerland, the Netherlands, the UK and the US to:

- Evaluate their policy on excluding live lamb cut wool
- Build a stronger understanding of brand behaviour regarding LLC disclosure
- Determine whether brands are helping consumers avoid wool from sheep subjected to LLC.

This report focuses specifically on LLC and does not assess broader animal welfare practices. However, its findings offer valuable insights into corporate responsibility and transparency practices that extend beyond LLC. We reviewed brands' wool sourcing policies, online product descriptions and in-store on-product labelling.

Approach

Brands were selected based on factors including their wool product range, size and market segment, and popularity and relevance in FOUR PAWS countries. Ratings were determined based on information that was publicly available at the time of the assessment.

The review was carried out in three phases. We:

- 1 Conducted an online assessment of brand sourcing policies and product claims on their websites.
- 2 Undertook an in-store investigation to evaluate disclosure on the physical items sold in retail locations.
- 3 Based on this data we evaluated a brand's transparency and action on live lamb cutting.



We then reached out to all brands with their ratings, offering guidance and the opportunity to flag any inaccuracies, as well as to strengthen their policies and online transparency before publication.

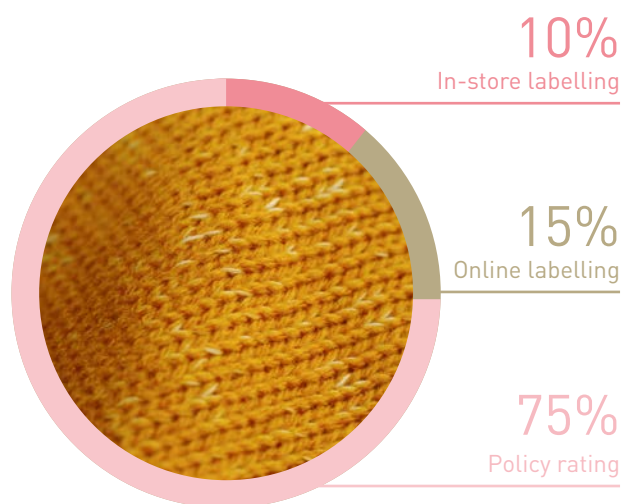
Assessment process

We used a traffic light system to indicate each brand's level of transparency and action on LLC. Each brand received a final colour rating based on three combined indicators:

- 1 Policy rating
- 2 Online labelling
- 3 In-store labelling

Brands were assessed in relation to four categories – green, yellow, orange or red – with green representing strong transparency and action, and red indicating no action taken.

Category indicators and weighting



- ➔ Policy rating [75%]. Does the brand publicly address live lamb cutting and show commitment? This category carries significant weight in the total score, as a brand's policy represents its formal commitment and describes the business intention across its entire wool supply chain. Brand policy statements were assessed using a traffic light system:
 - **Green:** The brand uses exclusively 100% certified LLC-free wool, supported by robust certifications.

- **Yellow:** The brand has made a strong public commitment to phase out LLC wool by 2030, supported by robust certifications.
 - **Orange:** The brand has taken some steps but lacks a strong commitment, such as missing robust certifications or timelines, or a less than 100% wool target.
 - **Red:** The brand uses wool but has not disclosed any position or action to address LLC.
- ➔ Online labelling [15%]. Can consumers identify LLC-free wool in online shops? Based on online searches, we reviewed 10% of each brand's online wool products – a minimum of 10, and a maximum of 30 items. We assessed the LLC-free claims and certifications applied within product descriptions. The rating reflects how clearly brands communicate the use of certified LLC-free wool across their online product listings:
- **Green:** 90–100% of reviewed wool products clearly state they are LLC-free and are backed by robust third-party certifications.
 - **Yellow:** More than 50% of reviewed wool products disclose LLC-free status with credible certification.
 - **Orange:** 21–50% of products disclose LLC-free status with certification, OR any percentage of products make LLC-free claims without robust certification.
 - **Red:** 0–20% of reviewed wool products disclose LLC-free status, with or without certification.
- ➔ In-store labelling [10%]. Can consumers identify LLC-free wool in physical stores? We assessed three to five wool products per brand, checking for relevant LLC-free in-store labelling, including QR code information. Given the limited availability of physical products compared to online listings, in-store reviews were conducted with slightly more flexibility. We assessed in-store product transparency using a traffic light system based on whether consumers can identify LLC-free wool in stores:
- **Green:** All reviewed wool products in-store clearly disclose live lamb cut-free details.
 - **Yellow:** Some reviewed products include live lamb cut-free information.
 - **Red:** No reviewed products provide any live lamb cut-free details.



Four levels of transparency

Brand performance was assessed across three categories that together determined an overall rating. Brands were then assigned to one of four transparency levels, from lowest to highest:

- ➔ **RED:** “No transparency.” Brands either lack a public policy on the issue and do not communicate on product labels OR they may have a position against the practice but not a strong commitment to phase out live lamb cut wool, nor do they communicate it on product labels.
- ➔ **ORANGE:** “Limited transparency.” Brands either have a position against LLC but not a strong commitment to phase out LLC wool and only partially communicate about LLC-free wool in product details OR they have a strong commitment but do not communicate on product labels.
- ➔ **YELLOW:** “Moving towards transparency.” Brands have made a time-bound commitment to transition towards 100% certified LLC-free wool.
- ➔ **GREEN:** “Leading in transparency.” Brands already source fully certified LLC-free wool products and communicate this in product details.

Top-rated brands use 100% live lamb cut-free wool certified to robust assurance schemes and communicate this in product details. Lowest-rated brands don’t even offer a public policy against live lamb cutting, nor transparency at the point of sale.

To influence their rating, brands had to make improvements visible to consumers by a set deadline. While future commitments to improvement are noted, they don’t influence current scores. Several brands intending to make changes have requested a follow-up review in the coming years.

Findings



While more than half of examined brands have published strong policies to mitigate LLC, **the biggest transparency gap was found where it matters most – in evidence-based consumer communication at the point of sale.** Only 39% of examined brands disclose third-party certifications on the product. The good news is that 9% of brands immediately improved their online product-level disclosure and an additional 8% committed to doing so in the next months, demonstrating that they care and that progress is possible.

Key statistics

Transparency gaps in wool sourcing

67%

of examined brands fall short on transparency. They either fail to publish a clear policy, omit product-level disclosure, or both. This leaves consumers in the dark about the high risk of LLC.

27%

have a position against LLC but make no firm targets.

25%

are clearly committed to avoiding LLC wool but offer no product-level proof.

15%

provide no information at all.



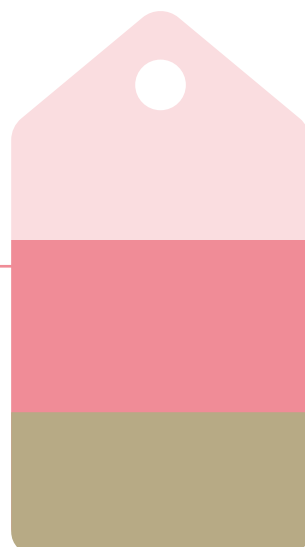
Transparency lags behind ambition

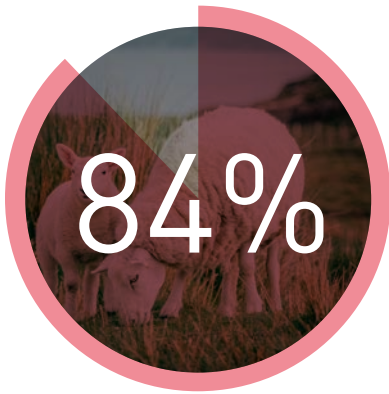
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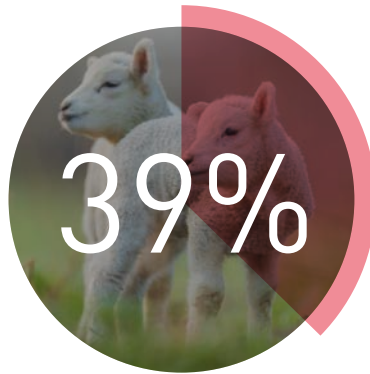
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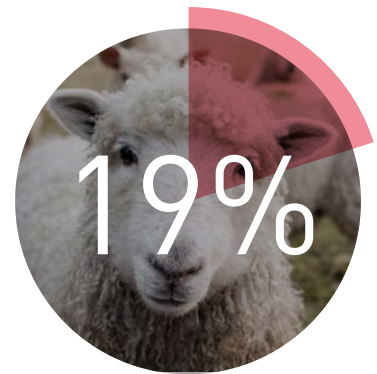




of brands reviewed have formal policies opposing LLC, indicating widespread industry rejection.

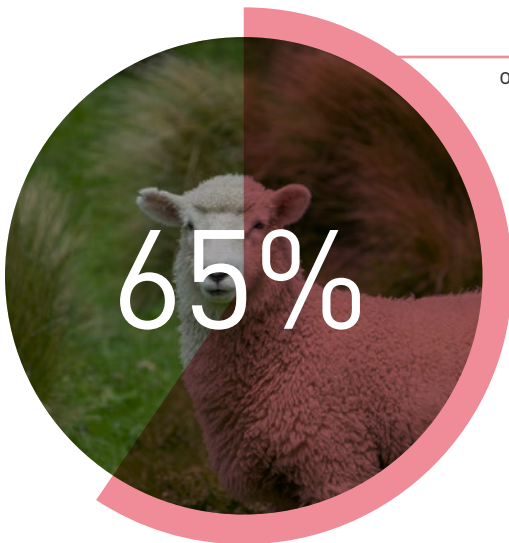


are committed to transitioning to 100% certified LLC-free wool, backed by robust certification and clear timelines.



of brands now use only certified LLC-free wool, but only half of them provide certification information at product level, within product descriptions or labels.

Signs of progress



of brands actively engaged with us during the research phase.



of all brands reviewed improved transparency immediately by strengthening their policies or product labelling, or joined collective action as a direct result of the investigation.



21

policy improvements were published.

17

brands pledged to increase transparency in the coming months.

14

brands are advocating for an end to LLC by signing the open Brand Letter of Intent, joining 140 companies globally.

11

new strong commitments to moving towards 100% LLC-free certified wool.

9

brands improved product-level labelling.

8

policy updates disclosed that LLC-free wool, certified to robust standards, is used exclusively.



Leaders and laggards



Transparency leaders

Arcteryx, COS, Ortovox, Patagonia and Tchibo (the top 5% of brands) are leading transparency by exclusively using wool that is certified as LLC-free and clearly communicating these certifications at the point of sale.



Biggest Improvers

Bulgarian brands DiKa, Junona and Teodor moved from red to green by publishing a strong wool-sourcing policy or by strengthening their existing one to highlight exclusive use of certified LLC-free wool and by adding certifications to all wool product details online.

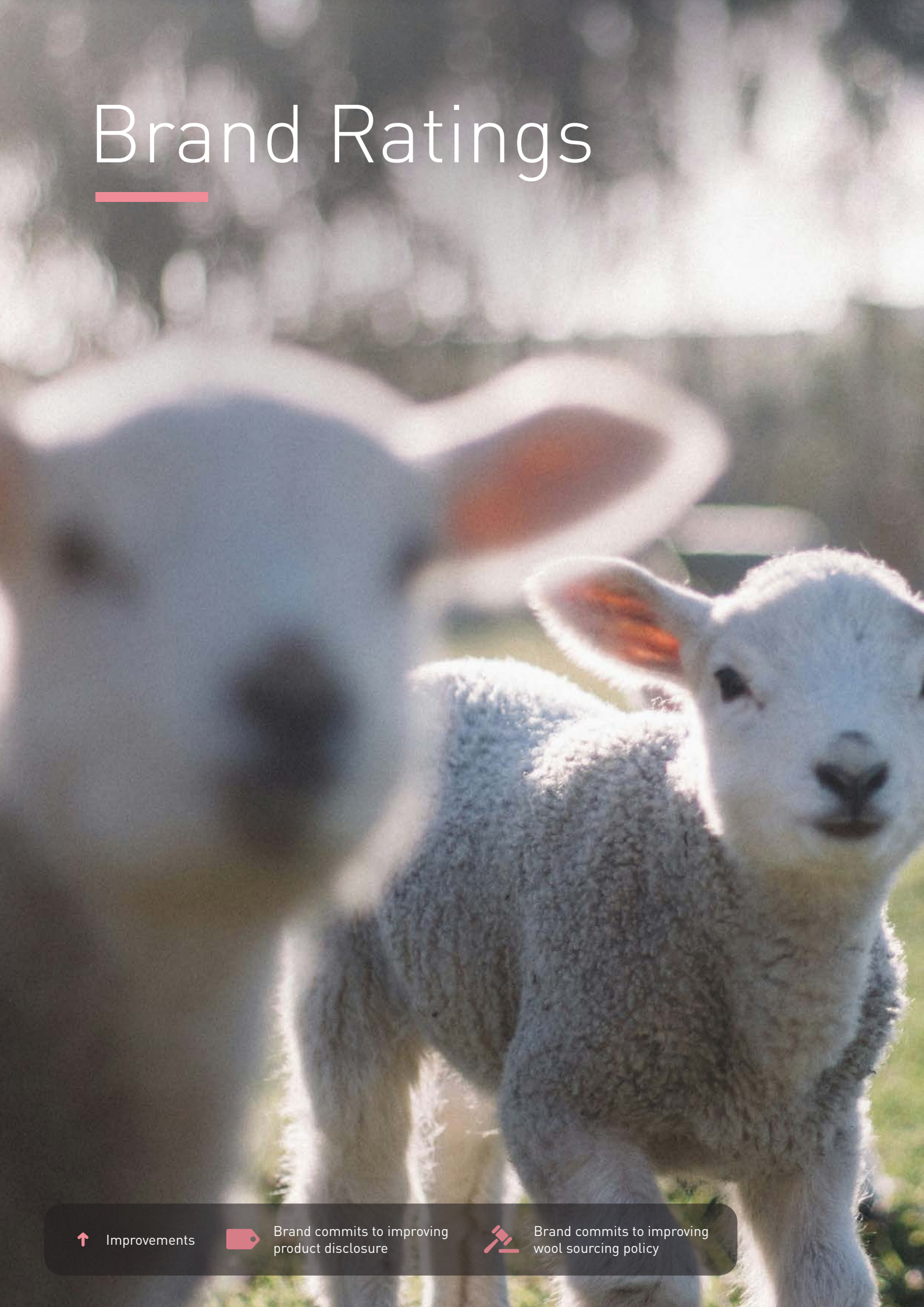


Worst laggard

Michael Kors scored 0 out of 100 in our investigation, making it the worst of the well-known global brands. Despite selling many wool products, it has no animal welfare or wool sourcing policy, no stance on live lamb cutting, and no use of certified alternatives. We found no relevant product information, and the company ignored repeated outreach. As a major global brand, this lack of transparency and accountability is unacceptable.



Brand Ratings



↑ Improvements



Brand commits to improving product disclosure



Brand commits to improving wool sourcing policy

Brand name	Final Rating	Policy	Online Product Disclosure	In-store Product Disclosure	Responded	Future improvements
ALLSaints	●	●	●	●	✗	
Arcteryx	●	●	●	●	✗	
Barkers	●	●	●	●	✓	
COS	● ↑	● ↑	●	●	✓	
DiKa	● ↑	● ↑	● ↑	●	✓	🏷️
Junona	● ↑	● ↑	● ↑	●	✓	
Mammut	●	●	●	●	✓	
Marc O'Polo	● ↑	● ↑	●	●	✓	
OLYMP	● ↑	● ↑	● ↑	●	✓	
Ortovox	●	●	●	●	✓	
Patagonia	●	●	●	●	✓	
Teodor	● ↑	● ↑	● ↑	●	✓	🏷️
Tchibo	●	●	●	●	✓	
Abercrombie & Fitch	●	●	●	●	✓	
Adidas	●	●	●	●	✓	
Aje	● ↑	●	● ↑	●	✓	
Bershka	●	●	●	●	✗	
BRAX	● ↑	●	● ↑	●	✓	🏷️
Breuninger (house brands)	●	●	●	●	✓	
Calida	●	●	●	●	✓	
Camilla and Marc	● ↑	● ↑	● ↑	●	✓	🏷️
CLOSED	●	●	●	●	✓	🏷️
Country Road	●	●	●	●	✓	
Devred	● ↑	● ↑	●	●	✓	🏷️

Brand name	Final Rating	Policy	Online Product Disclosure	In-store Product Disclosure	Responded	Future improvements
Gorman	●	●	●	●	✓	
H&M	● ↑	● ↑	●	●	✓	
Jack & Jones	●	●	●	●	✓	
Jack Wolfskin	● ↑	● ↑	●	●	✓	
Lacoste	●	●	●	●	✓	
MANGO	●	●	●	●	✓	
MARCCAIN	●	●	●	●	✓	🏷️
NILE	● ↑	● ↑	●	●	✓	
Paul Kehl (PKZ)	● ↑	● ↑	●	●	✓	
Peek & Cloppenburg Düsseldorf house brands	● ↑	● ↑	●	●	✓	🏷️
Ralph Lauren	●	●	●	●	✓	
REI Copp	●	●	●	●	✗	
REISS	● ↑	● ↑	●	●	✓	🏷️
Sandro	●	●	●	●	✗	
Smartwool	●	●	●	●	✓	
Tom Tailor	● ↑	●	●	● ↑	✓	🏷️
Vero Moda	●	●	●	●	✓	
Zara	●	●	●	●	✗	
Zegna	●	●	●	●	✗	
A.P.C.	●	●	●	●	✓	
American Vintage	●	●	●	●	✓	🏷️
Barbour	● ↑	● ↑	●	●	✓	🏷️ 🛠️
Bonobo	●	●	●	●	✓	
Burberry	●	●	●	●	✗	

Brand name	Final Rating	Policy	Online Product Disclosure	In-store Product Disclosure	Responded	Future improvements
Bybar						
Coop	↑	↑				
Décathlon						
Devold						
Ernsting's family						
Espresso						
Falke						
GAP						
John Lewis						
King Louie						
MacPac						
Manor						
Marks and Spencer						
Migros Essentials						
Monoprix	↑	↑				
Ochsner Sport	↑	↑	↑			
Peek & Cloppenburg Hamburg						
Petit Bateau						
Promod	↑	↑				
Salomon						
Schöffel	↑	↑				
Sessun						
Sissy Boy						
S.Oliver						

Brand name	Final Rating	Policy	Online Product Disclosure	In-store Product Disclosure	Responded	Future improvements
Strellson						
The Sting						
Walbusch	↑	↑				
Zimmerman						
Agnès b						
Aleta Parizi						
ANN TAYLOR						
Benetton						
Blue Illusion						
Brandy Melville						
Buff						
Cape Union Mart Group						
Comptoir des cotonniers						
Daphne						
Elizabeth						
Fabienne Chapot						
Fred Perry						
Galeria S.à r.l. & Co. KG house brand "Galeria Essentials"						
HEMA						
Kensol						
LL Bean						
Loro Piana						
Lucy Fashion						
Michael Kors						

Brand name	Final Rating	Policy	Online Product Disclosure	In-store Product Disclosure	Responded	Future improvements
Monni	●	●	●	●	✗	
Moscow	●	●	●	●	✓	
Pirin Hill	●	●	●	●	✗	
Rohner Socks	●	●	●	●	✓	
SABA	●	●	●	●	✗	
Superdry	●	●	●	●	✗	



Conclusion

Live lamb cutting remains one of the fashion industry's darkest secrets – over ten million lambs mutilated despite effective alternatives being used by Australian farmers for decades. Transparency matters – without it, consumers can't make informed choices, brands avoid accountability, and systemic cruelty remains hidden.

Australian wool industry leaders have proven themselves incapable of leading sector-wide change. We need global pressure from brands and consumers to signal market demand and drive both the Australian wool industry and the Australian government to take action on live lamb cutting. The stronger and clearer the signal, the more Australian woolgrowers will be compelled to shift their practices.

FOUR PAWS calls on brands to make clear, time-bound commitments to using only LLC-free wool, certified to robust standards with full traceability, on-farm audits and product-level transparency, so no consumer is misled, and lambs get the protection they deserve. Brands that meet these standards not only protect animals, they build consumer trust, future-proof their business, and align their supply chains with upcoming regulations.



FOUR PAWS Recommendation

This report does more than assess brand performance on LLC-free wool; it serves as a practical roadmap for improvement.

For brands, it offers clear, actionable steps to reliably exclude live lamb cutting from supply chains. This includes example timelines; an overview of the certification standards that provide the strongest safeguards; and recommendations for clear, compliant product labelling in line with relevant regulatory frameworks. See Brand Guide below for more information.

For consumers, it provides practical guidance on what to look for when shopping. It:



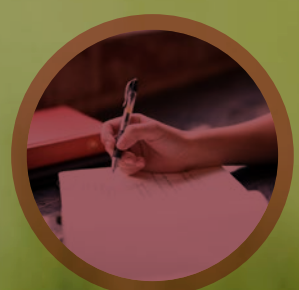
Offers a useful brand rating platform



Explains which certifications matter



Shows what trustworthy language looks like



Provides a list of powerful advocacy actions

See Consumer Guide below for more information.

The solution already exists – and when consumers and brands unite and refuse to be complicit in live lamb cutting, we can put an end to this cruel and outdated practice.



Guidance



Brand Guide - A brand toolkit for excluding live lamb cutting

LLC remains a painful reality for millions of lambs every year, but fashion brands have the power to change that – and it starts with transparency. With clear targets based on credible standards, brands can assess their LLC status and take meaningful action to protect animal welfare. Consumers are increasingly choosing ethical products, yet many feel misled by vague marketing claims. Purpose builds trust, and brands that embrace holistic sustainability, including animal welfare, are earning stronger consumer loyalty and standing out as leaders in a changing industry.

A roadmap to phase out live lamb cutting – the steps to ensure your supply chains are truly free from LLC and meeting consumer expectations.

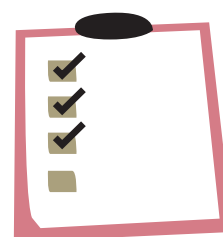
Step 1: Know your supply chains

- Identify where your wool comes from, where there are traceability gaps with regards to LLC, and which certifications your suppliers use to ensure your wool is LLC-free, or whether they don't use any at all.



Step 2: Publish a policy to exclude LLC wool by a specified time

- Involve staff, suppliers, NGOs and investors to set clear goals and pathways.
- Publish a time-bound policy with measurable targets and robust certifications, and make this a leadership-level priority.
- Ensure all suppliers are aligned with your policy and ensure compliance through verified standards.



Step 3: Implement a robust traceability system and internationally recognised LLC-free certification

- Prioritise standards with full supply chain traceability and regular on-farm welfare audits (see next page).
- Understand certification requirements and meet them to be able to display certification logos.





- For stronger assurance, combine internal and external audits.

Step 4: Help customers make informed choices by clearly labelling whether a product is certified LLC-free

- Communicate clearly and honestly. Avoid vague claims and use specific, evidence-based language (for more information, see section 'Product labelling that builds trust' on next page).
- Include certification information in your online product descriptions, such as the certification name, and, as best practice, also provide batch or transaction certificate numbers.
- Display the certification logo on physical product labels.
- Inform brand ranking platforms (e.g. GoodOnYou, FOUR PAWS Wear It Kind Directory) of your commitment.

Choosing the right certification

While well-designed animal welfare standards are a valuable tool for informing consumers, improving animal welfare and encouraging better farming practices, they come with limitations. Poorly developed or carelessly applied standards can contribute to “welfare washing” and provide brands and consumers with a false sense of assurance.

FOUR PAWS has reviewed a range of widely used standards to determine their reliability in excluding wool from sheep subjected to LLC. For a more detailed review, read:

<https://www.four-paws.org/llc-certifications-overview>

This is not an exhaustive list, and even among the “more reliable certifications” there is still substantial room for improvement as recent investigations have exposed poor and inhumane shearing and handling practices – even within certified supply chains⁵¹ – underscoring the urgent need for more consistent and comprehensive on-farm auditing. Therefore, FOUR PAWS calls for annual, third-party, independent audits of every farm. This is one of the most effective tools for protecting animal welfare.

FOUR PAWS actively engages with certification bodies to support continuous improvement and is encouraged by their willingness to cooperate. For example, GOTS is currently revising its standard (Version 7) with the aim of tightening requirements to better prevent LLC wool from entering certified supply chains for Version 8.

Product labelling that builds trust

The lack of product-level, evidence-based information (backed by strong certifications) is the biggest transparency gap identified in our research. Only around 5% of reviewed brands demonstrated consistent leadership in this area.

Clear, honest labelling isn't just a legal requirement – it's a chance to build real credibility with customers. Even when brands have committed to sourcing certified LLC-free wool, many fall short at the final step: communicating this clearly at the point of sale.

Help consumers make informed choices through transparent communications.

Fully substantiated claim: Product labels should include information that is specific and backed by credible, third-party certification, for example:

- "This garment is made with 100% certified Responsible Wool Standard (RWS) wool"
- "This product contains 100% ZQ certified wool"
- "100% GRS certified wool"

Ideally, these claims are supported by easy access to certification details, either in the product description, via a hyperlink or through a scannable QR code.

Partially substantiated claims: Claims such as "mulesing-free" or "live lamb cut-free" are not fully substantiated when they appear without visible third-party certification in product descriptions. These types of claims are often made by brands that:

- May source certified materials but are not certified as a brand, and therefore not permitted to use the certification logo on their products.



- ➔ Rely on weaker forms of verification, such as certificates of origin, supplier statements, or less robust certifications that lack third-party assurance or full chain-of-custody tracking.

In both cases, these claims must be clearly explained, ideally via a hyperlink or QR code directing consumers to the brand's wool policy.

For brands sourcing from countries where LLC is legally prohibited, such as New Zealand, the term "LLC-free" should not be used as a marketing claim or added value, to avoid greenwashing under the proposed EU Green Claims Directive.⁵⁰ Instead, brands can say: "Wool sourced from countries where live lamb cutting (mulesing) is not practised."

Unsubstantiated and risky claims: Avoid vague and potentially misleading claims like these:

- ➔ "Ethically sourced wool"
- ➔ "Responsibly sourced wool"
- ➔ "Animal welfare-conscious wool"
- ➔ "Animal-friendly wool"

Without clear evidence and third-party verification, these claims may not only erode consumer trust, they may also violate consumer protection laws. It is also important not to overstate what certified wool can guarantee.





Consumer Checklist – How to avoid live lamb cut wool

Avoid supporting the cruelty of live lamb cutting by following these steps.

Visit the FOUR PAWS Wear It Kind Directory⁵²

Check the FOUR PAWS Wear It Kind Directory to see how fashion brands perform on key animal welfare issues, including live lamb cut wool, fur, live-plucked down, and the use of animal-free alternatives.

Check the brand's website

Check the brand's website for an animal welfare policy. A responsible company will clearly state which animal materials it uses or avoids, how it sources wool, and how it ensures animal welfare. Look for the terms "mulesing" or "live lamb cutting" and check for more robust certifications like ZQ Merino, the Responsible Wool Standard (RWS), NATIVA, Cape Wool or certified recycled wool like GRS.

Check with staff

Asking staff is a powerful way to show that animal welfare matters to customers. Ask if the brand uses certified wool and which standards it follows. Check for signs or brochures with more information in-store.

Inspect the product

Check fabric labels and hang tags for certifications and claims, but be wary of vague terms like "responsibly sourced" or "animal-friendly". Look specifically for "mulesing-free wool", "live lamb cut-free" or the certifications mentioned above. The best brands follow strict animal welfare standards, even for wool sourced outside Australia, because global supply chains are complex and, without full traceability, unwanted mixing of LLC wool with LLC-free wool can't be ruled out.

Follow the general rule of "reduce, refine and replace"

To protect animals and the planet, choose less but choose better. Buy fewer animal-based products, choose those with stronger certifications, and switch to recycled or plant-based materials like organic cotton, hemp or linen.

Become an advocate – your voice makes a difference

Ending animal cruelty requires action from brands, suppliers and policymakers. You can help by signing petitions⁵³, contacting brands like Michael Kors,⁵⁴ and raising awareness. Every voice matters, and helps push for change.

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About FOUR PAWS

FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. Founded in 1988 in Vienna by Heli Dangler, the organisation advocates for a world where humans treat animals with respect, empathy and understanding. FOUR PAWS' sustainable campaigns and projects focus on companion animals including stray dogs and cats, farm animals and wild animals – such as bears, big cats and orangutans – kept in inappropriate conditions as well as in disaster and conflict zones. With offices in Australia, Austria, Belgium, Bulgaria, Germany, France, the Netherlands, Switzerland, South Africa, Thailand, the UK, the USA, and Vietnam as well as sanctuaries for rescued animals., FOUR PAWS provides rapid help and long-term solutions to address animal welfare issues.



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