

ACS

CIRCULAR ECONOMY
AMBITIONS

EXECUTIVE SUMMARY

ACS has set out 10 interconnected Strategic Impact Ambitions that together define a clear, credible roadmap for transforming the fashion industry and redefining what responsible business looks like in the 21st century.

These ambitions go beyond incremental improvement. They combine policy leadership, industrial-scale operational transformation, regenerative environmental practice, inclusive employment, and global thought leadership to tackle the root causes of waste, inequality, and emissions embedded in today's linear fashion system.

Grounded in internationally recognised frameworks — including the UN Sustainable Development Goals (SDGs), B Corp, Circulytics, and the UN Global Compact — and aligned with UK and Scottish policy priorities such as the Scottish Circular Economy Bill, Extended Producer Responsibility (EPR), and Fair Work, the ambitions position ACS at the intersection of delivery, policy, and systems change.

Each ambition is underpinned by measurable actions, time-bound targets, and named leadership accountability. Taken together, they reflect ACS's core conviction: that sustainability must be circular by design, inclusive by default, and scalable in practice — and that business has a responsibility not just to reduce harm, but to actively create positive value for people, communities, and the planet.

SUMMARY OF AMBITIONS

Making Sustainable Fashion Attractive & Affordable

Driving VAT reform and a national Salary Sacrifice Scheme to remove cost barriers and make circular fashion the most accessible choice.

Cementing ACS's Leadership in Circular Fashion Infrastructure

Scaling traceable, standards-aligned circular infrastructure across the UK and Europe through PEFCR, Digital Product Passports, and systems leadership.

Transforming Waste into Value Through Circular Innovation

Building EPR-ready systems that recover, remake, and recycle post-consumer textiles into high-value new products and materials.

Achieving Net Zero Carbon Emissions

Cutting Scope 1–3 emissions, enabling Scope 4 client savings, and launching a Carbon Savings Bank to evidence shared decarbonisation.

Leading With Clean Power

Generate More, Use Less

Generating 60% of ACS's energy onsite by 2026 while driving down consumption through smart technologies and workforce engagement.

Toward Zero-Impact Cleaning

Reducing water use, eliminating microplastics, and advancing closed-loop, low-chemical garment care at industrial scale.

Building a Regenerative, Nature-Rich Future

Delivering biodiversity and restoration projects — from community microforests to marine and peatland recovery — alongside education and access.

Championing Whole-Person Welfare

Creating a leading workforce welfare model that supports physical, mental, financial, and spiritual wellbeing through inclusive, trauma-informed systems.

Championing Equity, Diversity, and Inclusion in the Circular Economy

Embedding EDI across governance, employment, procurement, and policy — focused on systemic inclusion of underrepresented groups.

Redefining Leadership Through Standards & Shared Impact

Using ACS's voice to shape global frameworks, influence policy, co-create with academia, and model continuous improvement at system level.

Strategic Vision: ACS 2030

ACS Clothing Ltd. stands today as Europe's largest circular fashion operator, serving major retailers, charities, and public-sector partners through a fully integrated infrastructure for rental, resale, repair, refurbishment, and recycling. With over 30 years of experience and a purpose-driven model rooted in inclusion, sustainability, and innovation, ACS is actively reshaping how fashion is made, used, and reused.

Yet the wider fashion system remains dominated by fast, linear models that generate waste, lock in emissions, and exclude large sections of society from opportunity. Four systemic barriers continue to constrain progress:

- Fiscal policy that favours disposable fast fashion over circular alternatives
- Fragmented infrastructure that prevents reuse and recommerce at scale
- Insufficient recognition, funding, and regulation for circular practices
- Persistent social inequality, excluding underrepresented communities from green jobs and economic participation

ACS is not simply responding to these challenges — it is working to dismantle them.

By 2030, ACS aims to be the infrastructure backbone of a circular fashion system across the UK and Europe, enabling a just transition that is measurable, inclusive, and scalable. In this future:

- Circular fashion is more affordable than throwaway alternatives
- Zero-impact cleaning and reuse are the default, not the exception
- Every product carries a Digital Product Passport
- Every person — regardless of background — can access meaningful, sustainable employment

The 10 ambitions set out in this document define how ACS will deliver that future — through action, evidence, and leadership.

Strategic Enablers: Driving Systemic Change

To deliver its ambitions at scale, ACS is investing in five interconnected strategic enablers that ensure impact is durable, measurable, and system-aligned:

1. Policy & Regulation Influence

ACS actively shapes the enabling environment for circular fashion through direct engagement with regulators, policy submissions, and working groups. We advocate for VAT reform, EPR, Fair Work, and the integration of reuse and recommerce into climate and waste strategies — across Holyrood, Westminster, and global forums.

2. Digital & Data Innovation

Digital capability underpins ACS's circular infrastructure. Investments in AI, IoT, automation, and Digital Product Passports enable traceability, efficiency, compliance, and transparent decision-making at scale.

3. Measurement & Transparency

Every ambition is linked to robust metrics aligned with Circulytics, GRI, and the UN SDGs. ACS works with independent auditors such as Normative to track Scope 1–4 emissions and report progress through scorecards, reviews, and public disclosures.

4. Partnerships & Coalition-Building

System change is collaborative by nature. ACS works alongside WRAP, SEPA, UKFT, the British Fashion Council, universities, employers, and social enterprises to co-develop solutions, unlock investment, and mainstream circular models.

5. Workforce Inclusion & Development

ACS is building a workforce fit for the future — inclusive, skilled, and empowered. Through partnerships with the Scottish Refugee Council, Armed Forces Covenant, and training providers, we prioritise pathways into work for disabled people, refugees, ex-offenders, and those from low-income backgrounds.

AMBITION 1: Making Sustainable Fashion Attractive & Affordable

North Star

Make circular fashion the cheapest, easiest, and most attractive choice for UK consumers.

Why it matters

Current tax and employment policy favours fast fashion and locks consumers out of circular options. Correcting this market failure is essential to reducing emissions, tackling clothing poverty, and accelerating Net Zero.

When: 2026

Lead: Anthony Burns, Chief Operating Officer

Strategic Intent

Embed circular fashion into UK tax and employment frameworks so affordability and access drive behaviour change at scale.

Hard KPIs (Monitoring & Assurance)

- Formal VAT relief or equivalent fiscal mechanism progressed to consultation or pilot stage
- Salary Sacrifice Scheme piloted with ≥ 3 employers and $\geq 1,000$ employees
- Demonstrated consumer cost reduction of $\geq 20\%$ versus linear alternatives

What Success Looks Like (Outcomes & Metrics)

- VAT relief or exemption pathway agreed for circular fashion services
- Salary Sacrifice Scheme piloted with major employers
- Demonstrable consumer cost reduction versus linear alternatives

What We Will Deliver (Key Outputs)

- National Salary Sacrifice Scheme design and pilot
- Economic modelling and consumer impact evidence pack
- Public policy brief and implementation roadmap

AMBITION 2: Cementing ACS's Leadership in Circular Fashion Infrastructure

North Star

Build the UK and Europe's backbone infrastructure for traceable, scalable circular fashion.

Why it matters

Circular fashion cannot scale without trusted infrastructure, shared standards, and transparent data. ACS provides the missing delivery layer between policy ambition and real-world impact.

When: 2027

Lead: Andrew Rough, Chief Executive Officer

Strategic Intent

Position ACS as the reference infrastructure partner for governments, brands, and charities transitioning to circular models.

Hard KPIs (Monitoring & Assurance)

- Circulytics score published and improved year-on-year
- ≥80% of garments processed carrying Digital Product Passport lifecycle data
- ≥5 national or international policy/sector frameworks referencing ACS infrastructure

What Success Looks Like

- Circulytics score published and benchmarked
- Digital Product Passport integration live across services
- Formal recognition as a UK/EU circular infrastructure leader

What We Will Deliver

- Circulytics assessment and disclosure
- PEFCR-aligned impact metrics
- DPP-enabled traceability across rental, repair, resale

AMBITION 3: Transforming Waste into Value Through Circular Innovation

North Star

Turn post-consumer textiles into high-value products at industrial scale.

Why it matters

Textile incineration destroys value and locks in emissions. Circular innovation can recover materials, create jobs, and underpin EPR delivery.

When: 2028

Lead: Anthony Burns, Chief Operating Officer

Strategic Intent

Build EPR-ready infrastructure that prioritises reuse, remaking, and material recovery over disposal.

Hard KPIs (Monitoring & Assurance)

- $\geq 50\%$ reduction in textile incineration volumes versus 2024 baseline
- $\geq 70\%$ of post-consumer textiles diverted to reuse, remaking, or recycling
- ≥ 5 commercially viable non-garment product streams established

What Success Looks Like

- Year-on-year reduction in incineration volumes
- Increased percentage of textiles reused, remade, or recycled
- ACS recognised as an EPR delivery partner

What We Will Deliver

- Scaled repurposing and remaking capability
- Textile-to-product pilots beyond garments
- Published diversion and recovery metrics

AMBITION 4: Achieving Net Zero Carbon Emissions

North Star

Deliver Net Zero operations while enabling measurable carbon savings for clients.

Why it matters

Circular fashion is one of the fastest routes to emissions reduction. ACS can decarbonise both its own operations and its clients' supply chains.

When: 2029

Lead: Michael Cusack, Chief Sustainability Officer

Strategic Intent

Deliver a science-based Net Zero pathway that includes Scope 4 (avoided) emissions enabled through circular services.

Hard KPIs (Monitoring & Assurance)

- ≥90% reduction in Scope 1 & 2 emissions versus 2019 baseline
- Verified Scope 4 emissions reported annually and used by ≥10 clients
- Carbon Savings Bank operational and externally assured

What Success Looks Like

- Verified Net Zero pathway in place
- Scope 4 emissions quantified and reported
- Clients using ACS data for ESG reporting

What We Will Deliver

- Science-based carbon reduction roadmap
- Carbon Savings Bank for clients
- Transparent annual carbon disclosures

AMBITION 5: Leading With Clean Power

North Star

Power circular fashion with clean, self-generated energy while cutting demand.

Why it matters

Energy resilience and affordability are critical to sustainable manufacturing and Net Zero delivery.

When: 2030

Lead: Craig Findlay, Chief Financial Officer

Strategic Intent

Reduce exposure to grid volatility while embedding energy efficiency across operations.

Hard KPIs (Monitoring & Assurance)

- $\geq 60\%$ of total energy generated onsite by 2026
- $\geq 10\%$ annual reduction in energy intensity (kWh per garment processed)
- $\geq 95\%$ uptime of smart energy monitoring systems

What Success Looks Like

- 60% onsite energy generation achieved
- Annual reduction in energy intensity metrics

What We Will Deliver

- Solar PV and energy optimisation systems
- IoT-enabled monitoring and reporting

AMBITION 6: Toward Zero-Impact Cleaning

North Star

Prove industrial garment care can be water-light, chemical-light, and microplastic-free.

Why it matters

Laundry is one of fashion's hidden environmental hotspots. Low-impact cleaning is essential to scalable reuse.

When: 2029

Lead: Michael Cusack, Chief Sustainability Officer

Strategic Intent

Transform garment care into a closed-loop, low-impact system.

Hard KPIs (Monitoring & Assurance)

- $\geq 40\%$ reduction in water use per garment versus 2024 baseline
- $\geq 95\%$ microplastic capture efficiency across laundering systems
- 100% transition to eco-certified cleaning chemicals

What Success Looks Like

- Year-on-year water reduction per garment
- Microplastic capture systems operational

What We Will Deliver

- Rainwater harvesting and reuse systems
- Advanced filtration and ozone cleaning

AMBITION 7: Building a Regenerative, Nature-Rich Future

North Star

Move beyond harm reduction to actively regenerate nature and strengthen local ecosystems.

Why it matters

Climate resilience and biodiversity recovery require active restoration, not just emissions reduction.

When: 2028

Lead: Michael Cusack, Chief Sustainability Officer

Strategic Intent

Embed regeneration and biodiversity into ACS's operational footprint and community partnerships.

Hard KPIs (Monitoring & Assurance)

- ≥1 community-owned microforest established and maintained
- Measurable biodiversity net gain across ACS-led sites/projects
- ≥500 community engagement or education hours delivered annually

What Success Looks Like

- Community-owned regenerative microforest established
- Measurable biodiversity uplift
- Active community participation

What We Will Deliver

- Community microforest and habitat restoration programme
- Biodiversity education and volunteering pathways
- Partnerships for nature-based solutions

AMBITION 8: Championing Whole-Person Welfare

North Star

Set a national benchmark for dignified, secure, whole-person work.

Why it matters

Long-term productivity and resilience depend on workers feeling safe, valued, and supported.

When: 2029

Lead: Anthony Burns, Chief Operating Officer

Strategic Intent

Embed wellbeing and security into operational excellence.

Hard KPIs (Monitoring & Assurance)

- ≥90% staff satisfaction or engagement score
- ≥20% reduction in staff turnover versus 2024 baseline
- 100% Living Wage, Living Hours, and Living Pension compliance

What Success Looks Like

- Improved retention and wellbeing outcomes
- Strong progression for staff facing barriers

What We Will Deliver

- Integrated wellbeing framework
- Trauma-informed support and counselling access
- Annual welfare reporting

AMBITION 9: Championing Equity, Diversity & Inclusion

North Star

Ensure the circular economy creates opportunity for those historically excluded.

Why it matters

The green transition must not reinforce inequality.

When: 2028

Lead: Michael Cusack, Chief Sustainability Officer

Strategic Intent

Make equity and inclusion core performance requirements.

Hard KPIs (Monitoring & Assurance)

- Year-on-year improvement in representation across underrepresented groups
- ≥85% retention rate for inclusive recruitment pathways
- Annual publication of disaggregated EDI metrics

What Success Looks Like

- Improved representation and progression
- Transparent EDI reporting

What We Will Deliver

- Inclusive recruitment and progression pathways
- Leadership accountability mechanisms
- Supplier inclusion standards

AMBITION 10: Leading Through Standards & Shared Impact

North Star

Shape the rules, standards, and narratives that define responsible business globally.

Why it matters

System change requires credible leaders who demonstrate what good looks like.

When: 2030

Lead: Anthony Burns, Chief Operating Officer

Strategic Intent

Influence policy and standards while embedding continuous improvement.

Hard KPIs (Monitoring & Assurance)

- Sustained year-on-year improvement in B Corp and Circulytics scores
- ACS cited in ≥ 10 policy, academic, or sector publications
- Annual multi-stakeholder impact review completed

What Success Looks Like

- Recognition as a thought leader
- Evidence of policy and standards influence

What We Will Deliver

- Annual improvement plans and disclosures
- Policy engagement and thought leadership outputs
- Academic and multi-stakeholder collaborations

KPI OWNERSHIP & REPORTING FRAMEWORK

(Monitoring, Assurance & Accountability)

This framework assigns clear data ownership, reporting cadence, and assurance routes to each ambition, ensuring the strategy is:

- Board-Governable
- Funder-Assurable
- Audit-Ready
- Delivery-Focused

Ambition 1: Making Sustainable Fashion Attractive & Affordable

KPI	Data Owner	Reporting	Assurance
VAT / Salary Sacrifice policy milestones achieved	CSO (Policy)	Quarterly	Board & SE review
Average consumer cost reduction vs retail	COO	Biannual	Economic model validation
Number of employers participating in scheme	COO	Quarterly	Pilot governance review

Ambition 2: Circular Fashion Infrastructure Leadership

KPI	Data Owner	Reporting	Assurance
Circulytics score & maturity level	CSO	Annual	Ellen MacArthur Foundation
% of garments with Digital Product Passports	IT & Data Lead	Quarterly	Systems audit
Number of policy / strategy references citing ACS	CSO	Annual	External desk review

Ambition 3: Transform Waste into Value

KPI	Data Owner	Reporting	Assurance
Tonnes diverted from incineration	COO	Quarterly	Waste audit
% of incoming textiles repurposed / remade	COO	Quarterly	SEPA / internal audit
Number of new circular product streams	Head of Innovation	Annual	Commercial review

Ambition 4: Net Zero & Carbon Enablement

KPI	Data Owner	Reporting	Assurance
Scope 1–2 emissions (tCO ₂ e)	CSO	Quarterly	Normative verification
Scope 3 emissions coverage (%)	CSO	Annual	Methodology review
Client Scope 4 savings enabled (tCO ₂ e)	CSO / Commercial	Annual	Carbon Savings Bank logic

Ambition 5: Clean Power – Generate More, Use Less

KPI	Data Owner	Reporting	Assurance
% of energy generated onsite	CFO	Quarterly	Meter validation
Energy intensity (kWh per garment)	Operations Director	Quarterly	Performance audit
Energy monitoring system uptime (%)	Facilities / IT	Monthly	System logs

Ambition 6: Zero-Impact Cleaning

KPI	Data Owner	Reporting	Assurance
Water intensity (litres per garment)	Operations Director	Quarterly	Water audit
Microplastic capture efficiency (%)	Engineering Lead	Biannual	Equipment testing
% of chemicals eco-certified	CSO	Annual	Supplier verification

Ambition 7: Regenerative Nature & Biodiversity

KPI	Data Owner	Reporting	Assurance
Regenerative projects delivered	CSO	Annual	Partner confirmation
Biodiversity uplift indicators	External Ecologist	Biannual	Independent assessment
Community participation numbers	CSR Lead	Annual	Attendance records

Ambition 8: Whole-Person Workforce Welfare

KPI	Data Owner	Reporting	Assurance
Staff engagement & wellbeing score	HR Director	Annual	Survey audit
Staff retention rate	HR Director	Quarterly	HR reporting
Living Wage / Hours / Pension compliance	HR / CFO	Annual	Living Wage Foundation

Ambition 9: Equity, Diversity & Inclusion

KPI	Data Owner	Reporting	Assurance
Representation across protected groups	HR Director	Annual	B Corp / BITC
Retention of under-represented groups	HR Director	Quarterly	HR analysis
Publication of EDI metrics & actions	CSO	Annual	Public disclosure

Ambition 10: Leadership, Standards & Influence

KPI	Data Owner	Reporting	Assurance
B Corp & Circulytics score improvement	CSO	Annual	External certification
Number of policy frameworks influenced	CSO	Annual	Citation review
Independent stakeholder review completed	COO	Annual	Facilitated review