

Heat Stress Implementation Guidelines for Brands

*Part of AAFA's Toolkit to Protecting Workers
from Heat Stress:*

- **Introduction to the Toolkit**
- **Heat Stress Management Guidelines for Manufacturers**
- **Heat Stress Management Workbook for Manufacturers**, the companion to these guidelines
- **Heat Stress Implementation Guidelines for Brands**

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AMERICAN
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ASSOCIATION

Heat Stress Implementation Guidelines for Brands

AAFA Heat Stress Toolkit, September 2026

Introduction

These guidelines are intended to complement, and be used in conjunction with, the Heat Stress Implementation Guidelines for Manufacturers and Manufacturer's Workbook, which provide technical guidance for manufacturers on establishing and implementing facility-level heat stress management programs, as well as the standard Brand Supplier Survey Questionnaire.

These guidelines are built on five principles:

1. *Designed to protect workers.* Not designed to create another audit protocol.
2. *Data is used to develop programs and processes, and target investment.* Data is not there to supply new reporting requirements that do nothing to protect workers from heat stress.
3. *Shared risk and financial responsibility.* Sharing risk means shifting the relationship to a partnership: from brand as solution-prescriber and supplier as implementer, to brand as targeted enabler, with both sides absorbing some of the consequences when disruption hits. In practice, this means creating the commercial conditions for manufacturers to invest in resilience to protect workers from heat stress, which benefits the entire supply chain. This includes:
 - a. *Backing the confidence to invest.* Brands can't guarantee future consumer demand, but purchasing commitments and the broader partnership shape whether a manufacturer can make and recover a resilience investment at all.
 - b. *Share costs where the economics don't work for the manufacturer alone.* Some measures matter for the resilience of the whole supply chain but won't pay back for the manufacturer on their own. Here brands are recommended to weigh appropriate cost-sharing, factoring in the scale of the investment, the benefit to the wider chain, and the manufacturer's ability to recover it.
 - c. *Share the downside when disruption hits production.* Heat measures and acute heat events can affect capacity, delivery, and order fulfilment. Brands and suppliers should pre-agree as to how these impacts are handled, so the cost of protecting workers isn't transferred disproportionately to only the suppliers, or to the workers themselves. Examples include, but are not limited to, lost hours or wages for workers, the risk of consolidated production timelines once production can resume (i.e., excessive overtime and related pressures), and costs of alternative shipments (air shipments for speed) to deliver on time following a disruptive climate event.
 - d. *Regular communication is key to making this work.*
4. *Contextual over prescriptive.* Every factory is different, built differently, with different operations and machinery. This can be true even between processes within a factory. Every country, and every region within a country, is different, with different access to energy, particularly renewable energy, different access to resources, and financing, and different workforces and related issues. While a prescriptive "cookie-cutter" approach is seemingly attractive to brands, such an approach won't effectively protect workers. While every supplier must implement programs and processes to protect workers from heat stress, the programs must reflect the reality on the ground, which can be different by type of facility, type of building, type of location, and so much more.

5. *Two-way communication.* A contextual approach only works if the conversation runs both directions. Brands are recommended to co-create heat stress programs with their manufacturers and with workers on the shopfloor: communicating expectations clearly, resourcing implementation, and talking openly about commercial impact without commercial penalty. Manufacturers, in turn, are recommended to engage brands early and do strategic planning in advance, flagging serious heat events ahead of time, identifying the financial support and purchasing commitments needed for high-capex or high-opex controls, and recommending any delivery adjustments before they become crises.

Suppliers remain responsible for day-to-day facility operations, workplace conditions, and implementation of facility-level heat stress programs, while brands should support through common tools, training, engagement, and risk sharing, including case-by-case review of, and support to address, documented challenges.

Elements of a Heat Stress Management Program for Brands

1. Assessing heat stress risk for sourcing countries and areas
2. Establishing heat stress threshold and policy
3. Implementing responsible purchasing practices
4. Communicating expectations and standards internally
5. Communicating expectations and standards with suppliers
6. Sharing risk, cost, and financial responsibility

Step 1: Assessing heat stress risk for sourcing countries and areas

Before establishing expectations for suppliers, brands should understand where heat stress risks are most likely to occur within their supply chains. Brands may use publicly available climate and weather data, government heat alerts, local regulatory requirements, and information from sourcing partners to identify higher-risk sourcing locations and prioritize supplier engagement.

If the brand determines it is necessary to survey its suppliers to help the brand determine the highest heat stress risks, the brand should use the Standard Buyer Supplier Survey Questionnaire included in the *AAFA Heat Stress Toolkit*.

Brands should Consider:

- **Country-level risks**
 - Evaluate factors such as frequency and severity of extreme heat events, seasonal weather patterns, and local health and safety regulations.
- **Facility-level risks**
 - Consider responses to the Standard Buyer Supplier Survey Questionnaire when assessing facility-level risk.
 - Consider whether suppliers have operations that increase heat exposure such as limited ventilation or overcrowding concerns.
 - Consider that different manufacturing processes and/or machinery in the factory could create different risks.
 - Consider that different factory building types can impact risk.
- **Workforce risks**
 - Evaluate groups of workers that may face higher heat stress risks.
 - Incorporate and consider input from workers/worker representatives.

Step 2: Establishing Heat Stress Threshold and Policy

Following initial risk assessment, brands should establish policies and procedures that support the development, implementation, and maintenance of thresholds and programs at suppliers throughout their supply chains, as described in the *AAFA Heat Stress Toolkit's* Heat Stress Implementation Guidelines for Manufacturers. The brand should focus their help and support on priority facilities in the supply chain. Implementation should be done in a way that is not duplicative and does not overwhelm facility resources.

Brands are encouraged to coordinate, where feasible, when sourcing from the same facility to accept one consolidated response (for the questionnaire) and program from the facility. Brands should utilize Industry developed tools, such as the AAFA Heat Stress Tool Kit, to standardize reporting and implementation. The goal is to standardize the process so that suppliers receive the same requests and requirements from all their customers.

In turn, brands should establish their own heat stress policies and procedures:

- **Update company code of conduct**
 - Incorporate heat stress management expectations, based on the Heat the *AAFA Heat Stress Toolkit's* Stress Implementation Guidelines for Manufacturers, into existing supplier codes of conduct, health and safety requirements, or equivalent supplier standards.
- **Evaluate internal policies**
 - Review and ensure responsible sourcing practices incorporate heat stress management.
 - Assign internal ownership for oversight of the Heat Stress Management Program based on the organization's structure, including creating heat stress metrics for key departments, including the Sourcing department, since Sourcing is the main contact between brands and suppliers.
- **Include assessment, remediation, and escalation process**
 - Develop and include standardized questions on heat stress in existing brand social and labor assessments. Advocate for inclusion of the same in industry assessments (e.g., SLCP, ILO-IFC Better Work, WRAP, SMETA, BSCI).
 - Establish remediation and escalation process. Remediation plans should prioritize worker health and safety, identify short, medium, and long-term corrective actions, consider facility-specific constraints, and include follow up to verify implementation.

Data Governance and Information Sharing

- Establish clear expectations regarding the collection, use, and sharing of supplier data related to heat stress management, in line with the *AAFA Heat Stress Toolkit's* Heat Stress Implementation Guidelines for Manufacturers.
- Brands should recognize that collecting, maintaining, and reporting data requires time, resources, and associated costs for suppliers.
- Data serves the production floor first. The purpose of measurement is to trigger protection and target investment, not to feed passive tracking.
- Disclosure is periodic and aggregated. It should not be a continuous feed into multiple proprietary brand platforms or be the basis for the creation of a separate heat stress assessment.
- Develop clear expectations and responsible data governance to build trust, improve data quality, and support effective collaboration throughout supply chains.
- Encourage priority suppliers to support industry research to better understand risks and identify appropriate and effective interventions.

Step 3: Implementing Responsible Purchasing Practices

Once a program has been established, brands and retailers should integrate heat stress considerations into sourcing, purchasing, and production planning processes.

Sourcing and purchasing teams should consider the following practices:

- Incorporating heat stress considerations into production planning, especially during seasonal or forecasted extreme heat events.
- Evaluating the possibility of providing reasonable flexibility in delivery schedules on a case-by-case basis when suppliers provide credible information that future expected heat events or past heat events will/have created excessive heat conditions that have materially affected production and worker protection measures will be/have been implemented.
- Building communication protocols into supplier contracts for excessive heat events.
- Considering modification or elimination of penalties for suppliers for late deliveries due to excessive heat events. Review documented heat-related delivery impacts through established escalation channels, including possible provision of documentation, before determining whether commercial accommodations, including changes to penalties or delivery expectations, are appropriate.
- Reviewing production targets to ensure they do not discourage suppliers from implementing heat mitigation measures.
- Avoiding commercial practices that lead to excessive overtime or unsafe production during periods of high heat.
- Maintaining regular communication between teams so that operational decisions remain consistent with heat stress commitments.

Purchasing practice examples

- Building flexibility into delivery timelines during periods of extreme heat.
- Appropriately planning production in advance with suppliers ahead of peak heat seasons.
- Avoiding requests or last-minute changes that may lead to excessive overtime during heat events.
- Considering seasonal heat risks during production planning.

Brands should recognize that suppliers may face financial, technical, or operational barriers to implementation. Brands should work with suppliers on support, where appropriate, and establish realistic implementation timelines.

At the same time, brands should ensure that manufacturers work to ensure production adjustments, rest breaks, or schedule changes do not unintentionally reduce worker earnings for regular working hours or shift the cost of heat stress protections onto workers.

Step 4: Communicate Expectations and Standards Internally

Brands should establish internal communication and training processes to ensure employees understand their roles and responsibilities. As Brands are not experts in heat stress or heat stress management, brands should use the *AAFA Guide to Protect Workers from Heat Stress* and the *AAFA Heat Stress Toolkit* as the foundation for training on the topic.

- Educate production and sourcing partners on expectations/
- Educate relevant teams on heat stress mitigation best practices, high-risk sourcing locations, responsible purchasing practices, interpretation of questionnaire responses, and action plans for addressing implementation challenges.
- Follow and respect responsible purchasing practices when deliveries are delayed by excessive heat events.
- Create communication protocols with suppliers to encourage open dialogue regarding excessive heat events.
- Keep sourcing partners up to date on related factory issues.
- Establish a cadence for process review, re-training, and communications.

Step 5: Communicate Expectations and Standards with Suppliers

Once internal policies and procedures have been established, brands should clearly communicate heat stress expectations to suppliers and provide resources to support implementation. Brands should utilize industry developed tools and guidance, such as the *AAFA Heat Stress Toolkit*, to help standardize processes across the supply chain. Bespoke individual programs only cause duplication and excess work for suppliers and provide no additional protections for workers.

- **Hold webinars**
 - Conduct supplier webinars or training sessions.
- **Share relevant resources and updates**
 - Examples include the *AAFA Heat Stress Toolkit*, sample heat stress management policies, implementation checklists, and more.
- **Collect data via the Standard Brand Supplier Survey Questionnaire, available in the *AAFA Heat Stress Toolkit***
 - Distribute standard AAFA Brand Supplier Survey Questionnaire to assess progress.
 - Follow up with supplier questionnaire and conduct re-assessments.
- **Establish a cadence for review, education, and communication**
 - Establish regular two-way communication with suppliers on heat stress, particularly before, and during, seasonal and predicted high-heat events.
 - Establish a regular schedule for supplier communications, training, and progress reviews.
 - Where questionnaire responses or other monitoring activities identify implementation gaps, communicate remediation expectations, timelines, and next steps to suppliers.
- **Continuous monitoring and supplier engagement**
 - This is not a “one-off” exercise but requires continuous monitoring and engagement from brands to ensure workers are protected from heat stress now and into the future.
 - This means ensuring:
 - Heat stress management programs are still being implemented, and improved to reflect experience and learnings;
 - Effective administrative and engineering controls continue to be considered, and implemented, as practical; and
 - Potential costs and production ramifications are regularly addressed.

- Again, this continuous monitoring and engagement should NOT create new assessments or reporting requirements but should utilize existing assessments and worker engagement tools, as well as through regular communication mechanisms.
- **Modify existing assessments to capture key questions on heat stress**
 - Do NOT create a new or separate assessments. Advocate for inclusion of the same in industry assessments (e.g., SLCP, ILO-IFC Better Work, WRAP, SMETA, BSCI).
 - Example questions to include are:
 - What are the hottest months for the factory? What are the hotspots within the factory? Has a heat threshold been established? What is it?
 - Has a heat stress management program been established? Has it been implemented? What training has been provided to workers? What metrics are being used to measure success of the program? Is the program successful based on those metrics?
 - What administrative or engineering controls are being implemented to mitigate the impact of heat stress on workers? What is the timeline for implementation? What metrics are being used to measure the success of the controls being implemented?
 - What are longer term plans for continuous improvement with the heat mitigation program, and implementation of administrative and engineering controls?

Step 6: Shared Risk, Costs, and Supplier Support Considerations

Effective heat stress mitigation depends on collaboration between brands, suppliers, workers, and other supply chain participants, as well as with policymakers and regulators. Suppliers are responsible for implementing facility-level heat stress management programs, while brands have an important role in enabling successful implementation.

Implementing effective heat stress measures may require significant investment, changes to operating practices, and adjustments to production. For a manufacturer considering such an investment, there are three fundamental questions: Will there be enough future business to recover the investment? Can the manufacturer afford to make the investment from its own margins? And what happens if the investment or a heat-related disruption affects production?

Shared risk means that manufacturers should not be expected to bear all of the uncertainty and downside associated with these decisions. Brands cannot guarantee future business or eliminate uncertainty, but where investments contribute to the resilience of the wider supply chain, the associated risk should not sit predominantly with the manufacturer.

This means considering three areas of action: creating sufficient commercial confidence to support investment; sharing the cost where the economics do not work for the manufacturer alone; and sharing the commercial consequences when resilience measures or heat-related disruption affect production.

Support confidence to invest

Significant resilience investments require a reasonable basis for believing that the investment can be recovered through future business. Brands cannot guarantee future demand but should consider how the commercial relationship and purchasing commitments affect a manufacturer's ability to make and recover resilience investments.

Consider sharing costs where the economics do not work for the manufacturer alone

Some resilience measures may be important to the resilience of the wider supply chain but may not generate sufficient return for the manufacturer to justify funding the full investment from its own margins. In these cases, brands should consider possible appropriate cost-sharing mechanisms, taking into account the scale of the investment, the benefits to the wider supply chain, and the manufacturer's ability to recover the investment.

Examples

- Provide energy cost support for manufacturers who install engineered controls such as fans and air conditioning. The support would help offset increased OpEx costs during the hot season.
- Make longer-term sourcing commitments to help suppliers derisk bank loans for necessary structural improvements and engineering controls to improve facilities' thermal comfort.
- Provide grants and/or brand expertise for engineering studies on how to improve the thermal comfort of supplier's facilities.
- Help suppliers access lower cost loans through putting up collateral with regional banks to de-risk loans for facility thermal improvements.
- Provide up-front order deposits well in advance of orders to allow suppliers to place material orders earlier to offset heat event related delays.
- Provide greater transparency on how sustainability performance and investments affect sourcing decisions so that suppliers can make informed decisions on investments and upgrades.

Consider sharing the downside when disruption affects production

Heat mitigation measures and acute heat events may affect production capacity, delivery schedules, and order fulfillment. Brands should establish pre-agreed arrangements for managing these impacts so that the commercial consequences of necessary measures to protect workers don't hurt workers or are not transferred disproportionately to suppliers.

Conclusion

The Implementation Guidelines for Brands should be used in conjunction with the other sections of the *AAFA Heat Stress Toolkit* as well as the *AAFA Guide to Protect Workers from Heat Stress* and other resources available through the [AAFA Resources on Heat Stress Webpage](#).