

Brussels, 9 July 2020

Tender Specification

“Ecodesign” for textile: Focus on minimum requirements and material efficiency

Background

ECOS promotes and defends environmental interests in the development of standards at European and international level, as well as in the development of technical environmental product policies. As part of our work, we aim to promote the principles of resource and material efficiency from the very start of a product’s lifespan, i.e. from the design stage.

We need to dramatically limit negative environmental impacts of textile products¹, ensuring that standards and legislation contribute to a circular textile economy, including more durable design of (non-toxic) textile products as well as cleaner production and closed-loop recycling. ECOS strives to make sure that textiles on the EU market are circular, durable, and produced in a sustainable way, free of hazardous chemicals.

As textile consumption increases, so does its environmental impact. This is even more exacerbated by our throw-away culture and highlights our incapacity to deal with textile waste globally.

The European Commission believes there is a large potential for a circular economy action in the textile sector². A sectoral strategy for textiles under the Circular Economy Action Plan has been identified as a priority in the European Green Deal, which also sets out the Commission’s zero pollution ambition for a toxic-free environment. As in the case of energy-related products regulated through the Ecodesign Directive³, EU legislation can stimulate circular design and material-efficiency. Moreover, the European Parliament and Council have already expressed their wish to apply ecodesign requirements to the textile sector⁴.

Objective of this tender

ECOS seeks to commission a study to identify and specify minimum requirements for circular textiles, focusing specifically on material efficiency aspects (primarily focusing on durability, some aspects of

¹ In this text, the wording ‘textile product’ is used, as defined in the Textile Fibre Regulation (EU) No 1007/2011

² https://ec.europa.eu/environment/circular-economy/pdf/sustainable_products_circular_economy.pdf

³ The Eco-design Directive currently sets legally-binding/mandatory minimum requirements for energy-related products on the EU market. Until recently, these requirements have mainly focused on energy-efficiency, but material-efficiency aspects are gradually taken more into account.

⁴ European Parliament resolution of 31 May 2018 on the implementation of the Ecodesign Directive (2009/125/EC) (2017/2087(INI)) http://www.europarl.europa.eu/doceo/document/TA-8-2018-0241_EN.pdf Council conclusions on More circularity - Transition to a sustainable society. 4 October 2019 (12791/19) <https://www.consilium.europa.eu/media/40928/st12791-en19.pdf>

reusability, repairability, recyclability)⁵ and exploring ways to drive more environmentally responsible design of textile products through policy and standard recommendations.

Textile products should be designed for a long useful life and should be easy to re-use, repair or recycle. This includes the minimal use of virgin non-renewable resources, zero use and discharge of hazardous chemicals throughout the entire value chain and extending the life of products. Higher quality textiles will promote the use and reuse of those products for as long as possible and therefore circularity.

The study is also intended to provide contribution to the implementation of the EU's Product Policy Framework contributing to the Circular Economy, and its efforts to promote the eco-design principles to textile products. Improved enforcement mechanism should also be investigated.

A list of minimum requirements for textile on the EU market, in terms of durability and phase out substances of concern from the entire value chain, durability standard and design for longevity, for reuse and recycle, should be identified.

Scope:

The study will focus on textiles and more specifically on clothes and garments. Based on several studies⁶, clothes (in particular tops, underwear, jackets, and bottoms) have the highest environmental impact. Specific fibres and materials should be assessed carefully, such as cotton, polyester, polyamide, rayon, elastane, viscose, and their mix (including the most common one, polycotton)⁷. Chemical additives should be investigated as well, including dyes, anti-wrinkle agents, water repellents, flame retardants or antibacterial agents and their wider effect on circularity. Moreover, different yarns and way of spinning and weaving should be considered as well.

The study **will not** focus on the following areas:

- Carpets, mattresses, but also linen and household textiles seems to have a longer lifespan than clothes, but specific data are missing. Studies on the reasons that lead to the discard of those products are also missing. Those products will therefore not be covered within this study.
- Leather and footwear sector.
- Social, human rights, due diligence aspects, even though those are integral to a real comprehensive textile strategy within a circular economy.
- Textile reuse, remanufacturing, EPR schemes and how they are set up, sorting of clothes, logistics aspects, bans on incineration, access-based models based on renting, leasing or sharing.

The following material-efficiency aspects are to be covered: durability, repairability and reusability, recyclability, and recycled content.

⁵ Building on the paper by the Nordic Council of Ministers "Potential Ecodesign requirements for textiles and furniture" (2018) <https://norden.diva-portal.org/smash/get/diva2:1221509/FULLTEXT01.pdf>

⁶ Joint Research Center "Environmental Improvement Potential of textiles" (2014) https://publications.jrc.ec.europa.eu/repository/bitstream/JRC85895/impro%20textiles_final%20report%20edited_pubsy%20web.pdf

⁷ EEA briefing and ETC report Textiles and the environment in a circular economy

The study should focus on durability, taking a close look at the quality of the clothes currently on the market. Wear, tear and technical failures account for 50-60% of discards⁸, aside from subjective causes for discarding clothes (boredom, change of size, etc.), therefore identifying minimum criteria for durability will be central in the study.

Durability standards are already covered by EU Ecolabel and to some extent by other certification schemes (EU Ecolabel for textile products, The Nordic Swan, OEKO-TEX, Global Organic Textiles Standard GOTS, The Blue Angel, etc.). Durability aspects could cover for example: tensile strength of fibres, durability of fasteners, colours, shape, resistance to pilling, resistance to dry/wet rubbing, resistance to pilling, form retention, seams break, fasteners fail, fabric stained, colour change and staining⁹, chemical content etc. We understand that “design for durability” is often linked to characteristics such as oil repellence and waterproof qualities, but in this study it should cover the overall aim to increase the quality of textiles used and their reuse, repair potential, as well as their recyclability into high-value goods.

Design for reuse and recycling is not covered by the main labels around (EU Ecolabel for textile products, The Nordic Swan, OEKO-TEX, Global Organic Textiles Standard (GOTS), The Blue Angel, etc.). On minimum recycled content, the EU Ecolabel include some quantitative information.

When it comes to the textile industry and policy recommendation, the field of action of European policies and legislation could be limited by the fact that most production takes place outside of the EU borders.

Process

We propose that the process has three distinct steps:

1. Mapping of tools

A preliminary mapping and research phase to identify all relevant legislative, policy, standards, and other tools to identify minimum requirements for textile covering material efficiency aspects. The study should examine various product policy options to achieve the above objectives including regulation, sectoral policies, voluntary and industry certification, standards, and other potential tools. This list will be drawn up in agreement with ECOS. Both existing and potentially new instruments should be explored, and recommendations formulated towards achieving objectives of material efficiency.

ECOS is particularly interested in the following aspects:

- What is already available in this field?
- What are the minimum requirements covered?
- What do they include?
- How are these measured?
- Which threshold are there and why?
- Are there gaps that should be covered?

⁸ Nordic Council of Ministers “Potential Ecodesign requirements for textiles and furniture” (2018) <https://norden.diva-portal.org/smash/get/diva2:1221509/FULLTEXT01.pdf>

⁹ Data provided in Nordic Council of Ministers “Potential Ecodesign requirements for textiles and furniture” (2018) <https://norden.diva-portal.org/smash/get/diva2:1221509/FULLTEXT01.pdf>

- How can those be covered?
- Are there harmonised standards to test material-efficiency aspects of textiles products that should have priority to get things started?
- What are the fibres with a high wear/tear resistance? What are the ones with low wear/tear resistance? What are the coatings or dyes with a good colour fastness?
- Which durability standards and labels could be developed, in order to set a baseline for product quality and durability?
- Is there a sustainable mix of material that would be preferable?

2. Assessment and identification of minimum requirements

An assessment is to be made of tools (the list to be agreed with ECOS) against their potential to identify minimum requirements. Then identify potential gaps and regulatory needs, as well as regulatory and standards barriers to the identified minimum requirements.

This step will inform the first draft conclusions and recommendations and will be subject to a round of feedback from ECOS staff involved in the study.

ECOS is particularly interested in the following aspects:

- Are definitions of key terms clear cut?
- Any verification process in place? What does this entail?
- Are there key aspects overlooked?

Minimum requirements are to be benchmarked against best practice and the requirements set for chemical and environmental risks under the EU Ecolabel. While minimum requirements could be product specific, the study should also focus on identifying horizontal minimum requirements for all textile products.

It would be useful to allocate environmental benefits as a result of extended the lifetime of products because of increased durability, reuse, recycling activities by applying identified minimum requirements.

Market surveillance: investigate how market surveillance be improved for the identified minimum requirements. The Commission supports Member States with the market surveillance with new regulations¹⁰.

Possible questions:

- Would it be useful for those enforcing minimum requirements for textiles products?
- How to ensure improved monitoring and control at national level (i.e. EU testing facilities)?
- How would the establishment of a Union Product Compliance Network¹¹ can enhance market surveillance when it comes to minimum requirements for textiles put on the EU market?

¹⁰ To improve market surveillance there are already mechanisms under the REGULATION (EU) 2019/1020 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 June 2019 on market surveillance and compliance of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011.

¹¹ Hosted by the Commission and aimed at structured coordination and cooperation between enforcement authorities of the Member States and the Commission, and at streamlining the practices of market surveillance within the Union.

3. Policy recommendations and asks

Following feedback from ECOS, final recommendations will be agreed upon. The recommendations are required to be as specific as possible, and should include concrete asks in the framework of clearly identified EU initiatives in the pipeline under the European Green Deal (including the EU Textiles Strategy), the Industrial Strategy (specifically the textile ecosystem and recovery), as well as standardisation and certification activities, etc. It should underline as well when aspects are currently not covered and how those gaps can be overcome.

Project implementation

Delivery of the analysis will involve active contribution from and regular coordination with ECOS.

The key milestones of the projects include:

- A kick-off meeting
- An interim meeting
- An online final meeting

The kick-off and the interim meeting should preferably be in person meetings, in Brussels with the consultants directly involved in the study.

Throughout the implementation of the project, contractors will prepare at least:

- An inception report (around 10 pages, presenting the structure of the report and a methodology and process, to send to ECOS ahead of the kick-off meeting)
- An interim report (to send to ECOS ahead of the interim meeting)
- And a draft final report (to send to ECOS ahead of the final meeting)

After each report, consultation with ECOS and Rethink Plastic Alliance partners will take place, which will be led by ECOS.

Outputs

The contractor will deliver **a report**:

- Following roughly the following structure:
 - o Executive Summary
 - o Introduction
 - o Methodology
 - o Critical assessment / Analysis
 - o Recommendations
 - o Conclusions
- Contractors will provide when possible and relevant key facts and figures to ECOS to be used in communication materials. Contractors will provide a comprehensive draft, including suggestions for parts that could be represented visually, e.g. in infographics, and ECOS will coordinate the design work after the study is finalised., and ECOS will take care of designing infographics and representation.
- The length of the report should not exceed 20/25 pages (excluding references and annexes). Recommendations should be precise and have a policy relevance.

The contractor will deliver an **executive summary** of no more than 2 pages providing analysis highlights, conclusions, and recommendations.

The tenderer will assign to ECOS the exclusive right to own and use the outputs of this study. The authors will be acknowledged in the published ECOS report.

Tender preparation

Tenderers are requested to submit a proposal by **12:00 CET 17 August 2020** outlining:

- A brief description of the tenderer's understanding of the analysis demanded.
- A description of the anticipated activities to achieve the desired analysis.
- A description of how close coordination with ECOS will be ensured throughout the project.
- A description of the proposed outputs, including a draft structure for the full report.
- A detailed timeline on milestones and deadlines.
- Budgeting for each element of the work.
- Biographies and time availability of the key staff delivering the work, as well as their areas of expertise.

Budget

The budget available for this work is €15,000, excluding VAT, and all other costs incurred by the subcontractor. The table below provides an indication of percentage of time against the headlines of the different activities.

Activity	Percentage of time
1. Analysis	
1. Mapping of (policy) tools	25
2. Assessment & identification of gaps	20
3. Policy Recommendations& asks	30
2. Outputs	15
1. Full report	
2. Executive report	
3. Management	10
Project management (including meetings, coordination calls, travel, ...)	

Timeline

The final report should be provided by the 23rd of October 2020. The study should be subsequently published by end of November 2020. A pre-kick off online meeting will be held with the successful applicant(s) in the month of August, depending on the management team and contractor's availability. The kick-off meeting will take place in September.

Tender Assessment

Assessment of the tenders will be made by an appointed selection committee, using a pre-agreed evaluation template. The award criteria are:

- 70% quality:
 - delivery team expertise (CVs + relevant experience to be provided) and efficient coordination with ECOS,
 - relevance of application,
 - usefulness of the expected outcome
- 30% price

Only short-listed tenderers will be contacted.

Tenderers are requested to submit a proposal by 17th August 2020 to info@ecostandard.org.