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ECOS response to the EU Strategy for Textiles Roadmap

ECOS welcomes the Commission's initiative to set out an EU vision for an environmentally sustainable, circular EU textile sector¹ that delivers on EU zero pollution objectives and climate neutrality targets by 2050, and addresses the environmental and social impacts of textiles. The EU has the opportunity to take significant steps towards making textiles truly circular, making sustainable products the norm and inspiring the rest of the world. It is urgent to turn this vision into action since the *"important climate and environmental"* impacts of the textile sector continue to grow within the current linear system.

We welcome the fact that **textiles are recognised as a key product value chain** by the European Commission. We are also pleased to hear that **mandatory, and hopefully ambitious, measures are foreseen to move away from the "buy - use - throw away" pattern towards a real circular model**. In line with our suggestions set out in the European Civil Society Strategy for Sustainable Garments, Leather, and Footwear², we welcome the will to combine reinforced protection of human rights, environmental duty of care and due diligence towards a **sustainable, circular, and fair textile industry**. The textiles sector has been identified as one of the 'ecosystems for recovery' and the EU should set the sector on a path to a **fair and sustainable transition**, through a substantial business model shift: a sustainable sector is ultimately a more resilient one. We fully support the fact that the EU Strategy for Textiles will be providing incentives and support to product-as-service models, circular materials, and production processes, considering an EPR for textiles, setting targets to step up re-use (and recycling), boosting green public procurement and the sorting, re-use and recycling of textiles. We also agree that addressing fast fashion, tackling the release of microplastics and overall, the textile cross border pollution effects should be priorities.

Below, we set out ECOS views on how the EU Strategy for Textiles can go even further:

- ECOS firmly believes that the strategy should be more ambitious to **boost a shift towards circularity** and ultimately discourage the EU textiles sector to maintain a linear economy. It needs to better promote **upstream solutions** including prevention, better design, re-use, and overall improve the environmental performance and impact of products put on the market **instead of focusing mostly on the recycling/post-consumer phase**. Measures presented in the strategy should follow a real circular economy hierarchy, where **value retention is prioritised**, and where **prevention strategies** to avoid material consumption in the first place are adequately valued.
- The strategy should include the need for an **absolute reduction of global textile production and consumption** to significantly reduce the overall environmental footprint of the sector, while ensuring that enhanced sustainability standards for textile products will contribute to a just transition that ensures the fair distribution of prosperity across the value chain.³

¹ The textile industry comprises clothing, footwear, household textiles, including carpets and mattresses, and technical textiles.

² <https://fairtrade-advocacy.org/wp-content/uploads/2020/04/Civil-Society-European-Strategy-for-Sustainable-Textiles.pdf>

³ Ibid

- The textile industry today is linear, with synthetic fibres produced from finite resources accounting for two-thirds of the material input for textile production. There is an urgent need for a regulatory framework ambitious enough to contribute to **deliver on EU zero pollution objectives and climate neutrality targets by 2050**. This aspect is currently missing from the roadmap.

Make sustainable products the norm

- In line with the Sustainable Products Policy Initiative, the primary focus must be on **removing inefficient, toxic, wasteful and polluting products from the EU market** altogether, to ensure a level playing field. Textile products which do not comply with a minimum sustainability requirements should not have access to the EU market.
- Design phase should be front and centre to provide long term, lasting solutions. **Design for durability, reuse and reparability need to be a priority**. “*Design for sustainability*” should cover much more than just the “*uptake of secondary raw materials and tackle the presence of hazardous chemicals*”.
- **Minimum ecodesign requirements** are needed to address durability, reusability and recyclability, as well as eliminate hazardous chemicals, providing clarification on the expected lifespan of textile products and the durability of clothes, at the same time tackling microplastics release. An ambitious set of legal requirements supported by appropriate technical standards should enhance the design and manufacturing phases of textiles, and dramatically increase their potential to be reused, repaired and recycled, as well as improve the information to be conveyed across the value chain. Ambitious legislative tools are also needed, based on comprehensive and clear methodologies to ensure measurability, enforceability and comparability among products and services, but also to address trade-offs between different sustainability parameters.
- **Mandatory requirements for textiles sold in the EU should cover microplastic release from textiles**. Microplastics pollution and textile shedding consideration should be incorporated in all main instruments tackling textile products (Product Environmental Footprint, etc.) to prevent this form of plastic pollution.
- The Strategy should extend the **right to repair** to textile products.
- Textiles need a **product passport** to include environmental information, including a bill of materials and chemicals, and information on reparability, durability, and due diligence (social and environmental).
- More **sustainable and consumption production patterns** are needed and should indeed cover “*land, water use and the use of chemicals*”, but also **microplastics shedding and pollution**.
- **Mandatory standardised labelling and claims on sustainable and circular textiles** must be introduced to ensure environmental claims are relevant, transparent, and reliable to avoid ‘greenwashing’.
- Ultimately, the strategy needs to include and enforce the **ban on the destruction of textile products** (including excess inventory, deadstock and return items).

Regulate the use of chemicals in the production process and in final products systematically

- The strategy is currently lacking a **restriction on the manufacture, marketing, import, and export of textile products containing hazardous substances of concern**, going beyond the list of SVHC and securing the principle of substitution of hazardous substances by safer alternatives.
- **Disclosure on chemicals** used in finished products and during production processes is needed and ensuring their **traceability** is crucial. Instruments that are currently available should be **used consistently**. Given that they were not specifically designed for the textile value chain, they require

specific complementary measures to address its specificities, going beyond testing hazardous chemicals within products, but also the ones used and released in the value chain.

- Between 60-80% of textile products sold in Europe are manufactured outside of the EU. It is vital to achieve **effective chemical management throughout the whole textile value chain** and go beyond just looking at what is in the final product.

Set up EPR schemes for textiles in line with the EU waste hierarchy

- Ensure producers are responsible for the environmental performance of their products **along the whole value chain**. EPR schemes for textiles must respect and implement the **EU waste hierarchy**, not only focusing of the end-of-life stage, with a **clear transparent governance**.
- EPR fees should be **modulated** according to environmental performance along the value chain and circularity potential.
- EPR schemes should go beyond garments and footwear, to include **household textiles, carpets, mattresses**, and other textiles.
- EPR schemes should be coupled by ambitious **re-use and preparing for re-use targets**, making sure that local reuse is prioritized.

Ensure coherence and provide a clear direction for change

- The EU Strategy for textiles must act as the overarching framework, **tying together and reinforcing various new and existing legal instruments** and policy initiatives affecting a textile product, from production to end-of-life (*the planned Regulation on Green Claims, Empowering Consumer for the Green Transition Initiative, the Sustainable Product Policy Initiative, Initiative towards an EU Human Rights and Environmental Due Diligence Directive, Sustainable Finance and Taxonomy, review of Non-Financial Reporting Directive, Sustainable Corporate Governance Initiative etc.*) and the different impact areas (environmental, social, human rights, etc.), **preventing trade-offs and loopholes**.
- Ensure and enforce **sustainable production processes inside and outside the EU** is key for a level playing field where EU rules can set the bar, also through trade related initiatives.

We look forward to playing an active role in the continued stakeholder engagement around the Textile Strategy initiative.

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