



To:

European Commission
 Mr Matjaž Malgaj, Head of Unit ENV.B.4
 Ms Andreea Staicu, Acting Head of Unit GROW.G.1

In Copy:

Mr Carsten Wentink, Policy Officer DG ENV
 Mr Antonio De Sousa Maia, Policy Officer DG GROW

Berlin/Brussels, 09th January 2025

Ecodesign for footwear: Don't lose sight of measures for more sustainable production and use of shoes

Footwear production causes high greenhouse gas emissions and is responsible for at least a fifth of the greenhouse gas emissions and a third of the resource use and water pollution of the entire textile and footwear industry.^[1] The complex material composition of footwear – often consisting of materials that are difficult to separate or cannot yet be recycled – poses significant challenges to their recycling, ultimately leading to large amounts of waste. At the same time, footwear is often discarded a lot sooner than would be reasonable and necessary from an environmental perspective. This is due to a lack of information about materials and reparability and a low level of awareness among consumers.^[2] Developing ecodesign requirements for footwear could improve their durability, reparability and recyclability and thus significantly reduce their environmental impact.

Accordingly, we welcome that footwear is listed in Article 18(5) of the Ecodesign for Sustainable Products Regulation (ESPR) as a priority product group to be addressed under Ecodesign. In the JRC scoping study on product priorities published in November^[3], textiles and footwear are examined as a single product group and are identified as the product group with the highest relevance in terms of environmental impact.

The JRC is currently working on a preliminary study focusing solely on apparel. While we recognise that the latter represents the product category with the biggest volume within the textile and footwear product group, we are concerned that footwear might not be prioritised anymore, will disappear from the ecodesign agenda and that ultimately only apparel will be addressed within the product group. We understand the technical differences between footwear and apparel and thus the reasons why they were not addressed in the same preliminary study^[4]. Footwear differs from other textiles in terms of function and materials, and has a complex material composition that

requires customised ecodesign criteria. Nonetheless, footwear has a market size with a consumption value of over 26 billion euros in the EU^[5]; moreover, the environmental impacts associated with the production and disposal of footwear^[6] make the relevance of this product group clear. **We fear that the focus of the ‘textiles and footwear’ product group will be exclusively on the development of ecodesign requirements for apparel and that therefore the adoption of ecodesign requirements for footwear will be delayed considerably.**

The signatories of this letter therefore call on the European Commission:

- **to include footwear as a priority product group in the ESPR work plan; and**
- **to launch a preliminary study on ecodesign requirements for footwear as quickly as possible, in addition to the one currently ongoing for apparel.**

The first milestone of the preparatory study for textiles^[7] notes that too little research has been done so far on the reparability and recyclability of footwear, as well as on their lifespan and end-of-life management for footwear. This deficit makes it clear that there is an urgent need to take these aspects more into account in future research and development processes. Launching a preliminary study specifically on footwear would send a clear signal that the EU considers improving the sustainability of this product category as an important goal. Such a commitment could motivate research institutions to work specifically on this topic and encourage companies to develop innovative solutions.

The exclusion of footwear from the development of ecodesign requirements could also lead to inconsistencies with Extended Producer Responsibility (EPR) schemes, as provided for in the EU Waste Framework Directive. If footwear was to be included in the scope of ecomodulation under EPR systems – the criteria for which are being defined on the basis of ecodesign requirements (see Article 22c in the Parliament's position on the revised WFD), it would be important to ensure that the ecodesign criteria are established well in advance of the start of ecomodulation of products under the Waste Framework Directive.

The signatories of this letter represent stakeholders in the shoe retail, shoe repair, shoe recycler and recycled material producers and shoe manufacturing sectors, as well as associations in the field of environmental and consumer protection and social economy.

Signatories:

ECOS
European Environmental Bureau (EEB)
Fusio e.V.
INKOTA
NABU e.V.
Repair Your Pair
Right to Repair Europe
RREUSE

Runder Tisch Reparatur e.V.
Südwind e.V.
Sveriges Skomakarmästarförbund (Swedish Masters shoemakers organisation)
THE 8 IMPACT
Zentralverband des Deutschen Schuhmacher Handwerks (German central association of shoemakers)

^[1] European Environmental Agency (2022): Textiles and the environment: the role of design in Europe's circular economy, <https://www.eea.europa.eu/publications/textiles-and-the-environment-the>

^[2] Repair Your Pair (2023): Roadmap für einen nachhaltigen Gebrauch von Schuhen, <https://www.repairyourpair.com/ressourcen/>

^[3] JRC (2024a): Ecodesign for Sustainable Products Regulation: Study on new product priorities, <https://publications.jrc.ec.europa.eu/repository/handle/JRC138903>

^[4] JRC (2024b): Preparatory study on textiles for product policy instruments – 1st milestone, <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/467/documents>

^[5] JRC (2024b)

^[6] EEA (2022)

^[7] JRC (2024 b)