



R.E. European Commission response to French notification on draft law aimed at reducing the environmental impact of the textile industry

Brussels, 11 December 2025

Dear Vice-President Séjourné, Dear Commissioner Roswall,

With Member States required to set up mandatory Extended Producer Responsibility (EPR) schemes for textiles by April 2028, we, the 66 undersigned civil society organisations are writing to express our support for the draft French law which aims to ensure EPR policies tackle overproduction through meaningful ‘bonus-malus’ eco-modulation systems.

Overproduction in the fashion industry means Europe is consuming and discarding more clothing than ever, with huge amounts of surplus products driving the second-hand sector to breaking pointⁱ. Textile collectors and sorters are struggling to handle ever-greater amounts of low-value discarded clothing, much of which is ultimately exported, contributing to environmental pollution as well as debt and negative health outcomes in communities across Africa and Asia due to its low resale value. Overproduction is made possible by fossil fuel-based synthetic fibre useⁱⁱ, delocalised global supply chains and outsourcing to low-wage countries; a ‘race to the bottom’ model which has both negatively impacted workers and the environment in producing countries and hollowed out the European clothing and textile industry with 735,000 jobs lost between 2009 and 2021.ⁱⁱⁱ

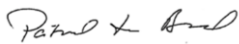
The true number of garments produced each year is not known due to a lack of transparency in disclosing production volumes. Just 17 out of the world’s 200 largest and most influential fashion brands disclose their production volumes; their combined annual production rate alone totals 4.3 billion items.^{iv} Yet while the EU’s Textile Strategy points to this increasing frequency of new collections and products as the root of the problem, there is a risk that the policies being developed do not consider the business and marketing practices that facilitate the sale and consumption of so much apparel and footwear, and that any environmental improvements made at the product-level through Ecodesign will continue to be cancelled out by such an overwhelming amount of new items.^v

But a **window of opportunity to tackle overproduction exists with the newly revised EU Waste Framework Directive (WFD)**.^{vi} The law gives Member States the possibility to require Producer Responsibility Organisations (PROs) to **modulate Extended Producer Responsibility (EPR) financial contributions on the basis of producers’ practices which lead to the overgeneration of textile waste**^{vii} – going beyond the mandatory harmonised eco-

modulation criteria which will be differentiated based on the future Ecodesign requirements for apparel textiles and set out in an Implementing Act.^{viii} **The French draft law^{ix} which aims to reduce the environmental impact of the textile industry** by introducing **a meaningful eco-modulation 'bonus-malus' system designed to target overproduction^x** represents the direct application of this WFD provision on producers' practices. Under the draft French law, eco-modulation criteria would be set with the aim of better capturing the environmental externalities of overproduction by looking at the price and the number of references, company size, and how long the product has been on the market for, as well as including a product's repair cost ratio into durability calculations – which considers the price of a new item in relation to its potential repair cost. Such criteria would only be efficient if they are linked to meaningful and progressive fees per product, and penalties which act as significant incentives for brands to improve their practices.

In light of the Detailed opinion no. 2 in the European Commission's response to Notification 2025/336/FR, we call on the European Commission to support Member States in their efforts to implement ambitious eco-modulation which is consistent with the revised Waste Framework Directive. The Waste Framework Directive gives Member States the possibility to set the rates and criteria for eco-modulation rules in national legislation. If it is only left to the Producer Responsibility Organisations who run EPR schemes there is little incentive for them not to settle for the lowest common denominator approach.

Yours sincerely,



Patrick ten Brink, Secretary General

European Environmental Bureau

Also, on behalf of the following organisations:

- Action Aid France
- Action Aid International
- Amigas de la Tierra - Spain
- Amis de la Terre Belgique
- Amis de la Terre France
- Buy Responsibly Foundation
- Changing Markets
- Clean Clothes Campaign
- Danish Society for Nature Conservation
- DUH - Germany
- Environmental Coalition on Standards
- Emmaüs Europe
- Emmaüs France
- Ethique sur l'Etiquette - France
- EU-Umwelt Buro - Austria
- European Environmental Bureau
- Fair Trade Advocacy Office
- Fashion Revolution
- Fashion Revolution Belgium
- Fashion Revolution France
- Fashion Revolution Germany
- Fashion Revolution Greece
- Fashion Revolution Italy
- France Nature Environnement - France
- Friends of the Earth Europe
- Future in our Hands - Norway
- Generation Climate Europe
- Global 2000 - Austria
- Good Gang Paris - France

European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org
International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:
ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

- Greenpeace International
- Halte à l'Obsolescence Programmée - France
- Hnutí Duha - Czech Republic
- INCIEN Slovakia
- L'Âme du Fil - France
- Malha Partage - France
- Max Havelaar France
- NABU - Germany
- NOAH - Denmark
- Parlons Chiffons - France
- Plastic Soup Foundation
- Public Eye - Switzerland
- RREUSE
- Réseau Francilien du Réemploi - France
- Réseau National des Ressourceries et Recycleries - France
- Sustainability Portal
- Südwind - Austria
- The Greener Good - France
- UAMEP - Collectif des autres modes
- Umweltdachverband - Austria
- Voice Ireland
- We Move Europe
- Za Zemiata - Bulgaria
- ZERO - Portugal
- Zero Waste Europe
- Zero Waste France
- Zéro Déchet Angoumois - France
- Zéro Déchet Essone - France
- Zéro Déchet Haute-Vienne - France
- Zéro Déchet La Rochelle - France
- Zéro Déchet Lyon - France
- Zéro Déchet Paris - France
- Zéro Déchet Saint-Etienne - France
- Zéro Déchet Sophie - France
- Zéro Déchet Toulouse - France
- Zéro Déchet Troyes - France
- Zéro Déchet Val de Siagne - France

ⁱ [Policy Paper: Addressing the second-hand textiles crisis](#), RREUSE

ⁱⁱ Over two-thirds of the 132 million tonnes of textile fibres produced globally in 2024 were fossil-based – the availability of which allows companies to produce high volumes of cheap clothing. Textile Exchange (2025) Materials Market Report. Available at: <https://textileexchange.org/knowledge-center/reports/materials-market-report-2025/>

Growth in polyester fibre use and growth in overall garment production are key drivers of a 7.5% increase in the fashion industry's greenhouse gas (GHG) emissions between 2022 and 2023. Apparel Impact Institute (2025) Taking Stock of Progress Against the Roadmap to Net Zero 2025. Available at: <https://apparelimpact.org/resources/taking-stock-of-progress-against-the-roadmap-to-net-zero-2025/>

ⁱⁱⁱ Textile & clothing industry employment by segment 2021. Statista. <https://www.statista.com/statistics/417725/eu-european-union-textile-clothing-industry-employment-by-segment/>

^{iv} Fashion Revolution (2025) What fuels fashion? Available at: <https://www.fashionrevolution.org/transparency/>

^v Maldini, I. and Klepp, I. (2024) The EU Textile Strategy: How to Avoid Overproduction and Overconsumption Measures in Environmental Policy. Available at: <https://luminousinsights.net/articles/JSN-2025-141>

^{vi} Directive (EU) 2025/1892 of the European Parliament and of the Council of 10 September 2025 amending Directive 2008/98/EC on waste. Available at : https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202501892

^{vii} Article 22c, 5a and 6

viii This is set to happen no earlier than 2027 after the adoption of the Ecodesign for Sustainable Products Regulation Delegated Act on apparel textiles.

ix Draft law, amended by the Senate, aimed at reducing the environmental impact of the textile industry, n° 1557, registered at the Presidency of the National Assembly on 10 June 2025. Available at: https://www.assemblee-nationale.fr/dyn/17/textes/l17b1557_proposition-loi (in French) and Available at: <https://technical-regulation-information-system.ec.europa.eu/en/notification/27032> (in English)

x See Article 2, paragraph 15 and 17