

**Dear Executive Vice-President Timmermans, Commissioner Sinkevičius and Commissioner Breton,**

We would like to share our views on the announced EU Strategy for Sustainable Textiles. This paper serves as a follow-up to the Roundtable on Textiles that took place on the 1<sup>st</sup> of June 2021. We wish to thank Commissioner Sinkevičius for his participation and the much appreciated opportunity to have an open discussion on this very relevant and important initiative.

**General reflections**

- The textile sector is a resource-intensive sector with significant climate and environmental impacts, which is identified as a key value chain in the EU Circular Economy Action Plan and as one of the priority industrial ecosystems to address the twin green and digital transitions in the context of the EU industrial strategy.
- We therefore very much welcome the announced initiative of the Commission for an EU Strategy for Sustainable Textiles.
- We would like to emphasise the need for an ambitious and comprehensive EU Strategy, that focuses on the entire textiles value chain. To achieve the ambitions of the Green Deal and a future competitive European textile industry, the transition towards a safe, sustainable, just, circular and climate-neutral economy is crucial.
- We stress the urgency, which has become even more apparent during the COVID-19 crisis. We need to act now to facilitate the textile industry to recover in a more resilient, circular and sustainable way that increases the competitiveness of the EU on the global market. Besides our dependency on linear models with long supply chains, which are susceptible to disruption, the crisis also highlights the emerging awareness among consumers and civil society of our wasteful patterns and aspirations to different lifestyles and ways of doing business.
- With the upcoming requirement for separate collection of textile waste in the EU, combined with recent achievements in sorting and recycling technology, there is a clear possibility for the EU to become a competitive leader in secondary textile materials.
- We therefore would strongly welcome the introduction of clear, incremental and ambitious targets on collection, reuse and recycling of textiles and the necessary EU-actions to ensure that these goals are achieved.
- In doing this, we urge the Commission to take an integrated approach and focus on both environmental and social aspects in the textiles sector.

**Design, product requirements and hazardous substances**

Large amounts of unsustainably produced textiles enter the European market that are unfit for repair and recycling and that do not meet sufficiently high durability standards. We believe this situation needs to be addressed urgently, and propose the following actions:

- The Strategy should be complementary to other policy initiatives, in particular the announced Sustainable Products Initiative and Chemicals Strategy for Sustainability. It is crucial to focus on the entire textiles life cycle and to stimulate the production and use of chemicals, materials and products that are safe and sustainable from the design stage.
- Within the framework of the Sustainable Product initiative and chemicals and products legislations, we ask for measures that set clear and ambitious product requirements and sustainability criteria, with equal conditions for EU produced, exported and imported textile materials and products in a WTO compatible way. This will boost safe and sustainable manufacturing worldwide.
- In this regard, we would also like to stress the importance to address products entering the market through e-commerce.
- We ask to prioritize regulatory actions for minimizing and phasing-out the use of harmful substances in textiles. These are not only harmful to health and the environment, but also form an obstacle for recycling. Besides, the level of chemicals safety should not be lower for recycled based articles compared to the other products on the market. Giving special attention to PFAS, polybrominated flame retardants and other POPs. Furthermore we stress the importance to minimize emissions of microplastics and the use of textiles that cannot be recycled. Regulatory actions in this field should inscribe into (or in coherence with) the REACH and CLP regulatory frame.

- We would like to stress the need to foster innovation and utilize available funds to stimulate research and investments for non-toxic alternatives, high-level recycling technology, resulting in non-toxic, high-quality secondary raw materials, sustainable bio-based fibres, as well as utilizing fibres from waste- and side-streams. Thereby ensuring an overall positive environmental and climate performance.

### **Closing the loop**

The very linear model of the textile sector and the very fast turnover of products (an over-consumption phenomenon also known as *fast fashion*) lead to significant and unsustainable impacts. Therefore, the transition to a more circular model is indispensable. Fast Fashion is a major issue; the average EU citizen buys 60 per cent more clothing and keeps them for about half as long as compared to 15 years ago. Measures need to be put in place urgently to tackle overconsumption and increase reuse and recycling as increasing (over)production and consumption results in huge amounts of waste and aggravates the overall environmental impact of textiles.

- We ask for a study on the dynamics of fast fashion and how to address this phenomenon, including influencing consumer behaviour as well as encouraging new circular business models to counteract the negative effects of fast fashion.
- We call for the waste hierarchy to serve as a basis in developing the strategy.
- We ask for measures to prolong the lifespan of textiles to be key part in the strategy.
- We would strongly welcome clear EU targets on collection, reuse and textile-to-textile recycling.
- We furthermore ask to explore for which materials textile-to-textile recycled content requirements can be established on the short term.
- We would strongly support measures to avoid disposal of unsold goods, for instance via a ban, as it is unacceptable that products skip the use-phase entirely. While destruction may be warranted in very specific cases, we ask for measures that tackle the root of the problem. It could be helpful to oblige companies to provide data on the remains of their products and to report on measures they undertake to prevent the destruction of goods.
- We support the focus on harmonized EU-wide EPR principles, in line with the polluter pays principle.
- We stress the important role of green public procurement as a means to help create a new market for recycled textiles and ask for comprehensive EU criteria and to consider common targets.
- Measures should not impede reuse initiatives, unless they are required to adhere to restrictions on the further use of specified textiles, restrictions which are decided following the REACH regulation.

### **Transparency and consumer information**

Transparency needs to be improved and greenwashing must be avoided. Consumers have a right to know the environmental and social impact of their purchases, as this enables them to make informed choices.

- We support the development of a digital product passport for textiles in order to enable tracking and tracing and ensure access to information about products and their components concerning; origin and composition including declaration of hazardous chemicals and substances of concern, their durability if appropriate, reuse, repair and dismantling possibilities and end-of-life handling, as well as their environmental performance.
- We stress the importance of awareness raising measures among consumers, including the production, use and disposal phase
- We call for a mandatory label to inform consumers in a direct, simple and comprehensive manner about both the environmental and social impacts of a garment at the moment of purchase.
- We would strongly welcome horizontal legislation on due diligence and sectoral criteria and guidance for textile products.
- We suggest the Strategy to be aligned with the Green Claims initiative.

**Yours sincerely,**

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