

EEB feedback to the Roadmap for an EU strategy for sustainable textiles: Discussion paper

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Introduction

With textiles and clothing value chains characterised by the use of huge amounts of our planet's finite natural resources, the use of huge amounts of hazardous chemicals, the production of high levels of waste, poor working conditions and human rights violations, the EEB welcomes the publication of the 'EU strategy for sustainable textiles Roadmap' and the Commission's initiative to address the impacts of textiles and the sustainability of this sector.

The aim of this paper is to give our feedback on the Roadmap's understanding of the problem and the possible solutions. We seek to build and elaborate on the ideas we previously set out in the European Civil Society Strategy for Sustainable Garments, Leather, and Footwear¹. We look forward to building on these ideas further as we play an active role in the continued stakeholder

¹ <https://eeb.org/library/european-civil-society-strategy-for-sustainable-textile-garments-leather-and-footwear/>

engagement around the Textile Strategy initiative, starting with the forthcoming public consultation.

Scope of the Initiative

We welcome the Roadmap's stated aim of '*setting in place a comprehensive framework to create conditions and incentives to boost the competitiveness, sustainability and resilience of the EU textile sector, taking into account its strengths and vulnerabilities, after a long period of restructuring and delocalisation, and addressing its environmental and social impacts*'. At the same time, given the integrated and complex nature of global textile value chains, it is vital that the textile-specific and horizontal actions included in the Strategy take a global approach. The Roadmap correctly identifies that most of the pressure and impact linked to clothing, footwear and household textiles in Europe occur at manufacturing sites in other regions of the world. However, the Textile Strategy should go further and recognise that this pressure and impact² is the result of a business model based on the sale of ever-more new products made from finite virgin resources which have a short useful lifespan and are seldom reused or recycled (the linear economic model), particularly when it comes to clothing and fashion products. The Textile Strategy should recognise that economic growth in the global textile and clothing industry is maintained through the extraction and exploitation of resources, from raw materials to labour.

The Textile Strategy should act as the overarching framework that ties together the various new and existing legal instruments affecting a textile product, from production to end-of-life. These instruments should be based on the principles of absolute resource-use reduction, achieving a toxic-free environment, absolute reduction in climate and environmental impact, and the respect of fundamental human rights.

Our vision

To protect the life-sustaining Earth functions we all rely on and to remain within a safe operating space for humanity, the Strategy should be ambitious and seek to truly move the sector away from the linear economic model. The Textile Strategy should not be limited to 'cleaning up' or counterbalancing the negative effects of overproduction and consumption while maintaining a 'business as usual' approach. This means that the textile industry's sheer growth in material use must be addressed if we are to respect ecological limits. We welcome that the Roadmap will investigate incentives for product as a service and other sustainable business models, however we would stress that they should not be 'add-ons' to the linear model, rather they should replace it and the conditions to make this replacement happen should be seriously thought through to ensure such new business models do not remain merely aspirational.

The Textile Strategy should therefore focus on significantly reducing the amount of natural resources (such as land, water and oil) used by the textile industry in the first place to tackle the overlooked emissions hidden in the textile products we buy and significantly reduce the

² The EU's consumption of clothing, footwear, and household textiles uses 675 million tonnes of raw materials every year – an average of 1.3 tonnes per EU citizen. 73% of all textiles end up in landfill or incineration (Ellen MacArthur Foundation) and about 5.6 million tonnes of textile waste was generated in the EU in 2013. Textiles cause the second highest pressure on land use and are the fifth largest contributor to carbon emissions from household consumption, and are responsible for using 53,000 million cubic metres of the world's water every year. (EEA)

footprint of overall EU production and consumption. To this end, we welcome that the initiative might consider setting targets to significantly step-up reuse and recycling efforts as well as sustainable public procurement in the EU, but we also urge the Commission to consider setting targets to reduce the use of primary raw materials and chemicals by the textile industry, and to propose ambitious mandatory requirements to make textiles sustainable by design.

There can also be no market access for textile products where both human rights and environmental due diligence has not been carried out. The transition to a more resource-sufficient and toxic-free industry must be a just one for its millions of workers. To date, voluntary self-regulation has not been effective in setting corporate accountability. With the EU being a significant market of major retailers and brands as well as where they are domiciled or based, policymakers have a responsibility to set the textile sector on a path to a fair and sustainable transition, one that is planned and invested in.

1. Making sustainable textile products the norm

1.1 Minimum requirements to deny worst-offending textile products entry to EU market

Ecodesign requirements for textiles will be the primary instrument for achieving the first objective of the Sustainable Products Initiative³ which is to deny *all*⁴ unsustainably produced, inefficient, toxic, wasteful, and polluting textile products access to the EU market. Minimum performance requirements should play a role in preventing a race to the bottom on price and quality which hampers the uptake of more sustainable solutions.

Ecodesign requirements for textiles must be set through an open, transparent, science-based process involving civil society actors, and build on existing requirements in the EU Ecolabel (and equivalent labels) to ensure that sustainable textiles become the default choice.

Design for sustainability

Designing for sustainability should go beyond ensuring the uptake of secondary raw materials and tackling the presence of hazardous chemicals (the approaches cited in the Roadmap). Designing for durability, reuse and repairability should be the priority.

To address the durability of textile products, Ecodesign requirements could ensure fabrics are more resistant to pilling, improve colour fastness properties, tear strength, and dimension stability. Repairability can be enhanced through requirements to provide spare buttons, thread and zips on demand/in store, as well as sewing plans and repair tutorials, for example. Such requirements would help to combat what the Roadmap describes as textile products being 'used

³ [EEB feedback to Sustainable Products Initiative](#)

⁴ While the Roadmap ascribes today's high rates of clothing discard to the 'fast fashion phenomenon' - the idea that we are buying too much, at too low a quality, for too cheap, and then throwing it away too fast - it should also consider that clothes sold at higher prices are not intrinsically more durable.

for a shorter period' today which results in high rates of discard. All textile products could also be required to come with a minimum warranty aligned with their expected lifetime. The Commission should explore ideas such as setting a minimum lifetime of five years for all textiles and ensuring that stated lifetimes match with the duration of warranties. This will help consumers see the values in textiles they acquire, and push producers to compete on making durable textiles with a long warranty.

Circular Material flows

Ecodesign requirements for textiles should encourage recyclability (for example through restricting the number of and types of certain material mixes).

To reduce the amount of virgin fibres used, Ecodesign requirements should set minimum thresholds for secondary raw materials in certain textile products. Requirements should be set on recycled material commitments to ensure these are being met with material from closed loop recycling rather than by material from other waste streams, such as plastic water bottles.

Circular material flows can only be safe if they are free from hazardous chemicals or if hazardous chemicals that cannot be phased out are strictly regulated. Ecodesign requirements for textiles should therefore restrict and substitute chemicals of concern. The strategy should ensure transparency on the chemicals present in textiles products, in line with the commitments of the Chemicals Strategy for Sustainability.⁵ (See section 'Stopping the chemical overload' below).

1.2 Product passport

Given the complexity of the textile supply chain, ensuring the traceability of chemicals used is crucial. The European Commission's initiative to develop a product passport⁶ is very relevant to achieving this goal. Alongside other existing EU product databases (e.g. SCIP and EPREL), the product passport could make available relevant environmental information such as the bill of chemicals and materials, as well as other information on repairability, durability, and due diligence. A product passport will be able to assist recyclers. For market access, producers would be obliged to ensure that relevant information on all elements of the textile value chain is available in a standardised way to allow common understanding, accessibility, clarity and comparison. For EU market access for textile products it must be mandatory to supply information about Tier 1, Tier 2, and Tier 3 production as well as the suppliers involved in the production of raw materials – following a 'farm to fibre' or 'ground to garment' approach.

1.3 Sustainable production

Ecodesign requirements alone will not be enough to achieve the objectives of a resource-sufficient and toxic-free industry, and we welcome that the Textile Strategy will also 'propose actions to promote more sustainable production processes'. The EU must strengthen and

⁵ [Chemicals Strategy for Sustainability: Towards a Toxic-Free Environment](#)

⁶ The EEB defines a product passport as a standardised format for collecting product specific environmental information. An interoperable information system would be established to access this standardised product data from on single public interface.

promote the EU Best Available Techniques (BAT) reference documents (BREFs) as a global standard and adopt more ambitious standards where they are in place in other countries. Clear legal standards for manufacturing within the EU should also be mandatory for products imported into the EU.

As part of the Textile Strategy, we encourage the Commission to consider how more sustainable sourcing of raw materials used to produce textiles can be incentivised in order to ensure that the full lifecycle of textiles will be covered.

1.4 Microplastics

We welcome that the Roadmap points to the need to tackle microplastic release given that synthetic textiles are a significant source of microplastic marine pollution, potentially accounting for up to a third of all microplastics entering the oceans annually⁷. To this end, mandatory requirements for textiles sold in the EU should address the reliance of the textiles industry on synthetic fibres and they should also address fibre shedding/release from textiles by going beyond measurement and towards prevention measures such as product design to reduce shedding and controlled industrial pre-washing. This is one example where the Ecodesign requirements should work hand in hand with the BREF. Requirements relating to the production of textiles could also be complemented by other measures related to sectors involved in the use phase (for example, the revision clause in the Ecodesign requirements for washing machines and waste-water treatment).

Above all the Textile Strategy should aim to enhance a preventative approach to reduce the use of fibres that shed microplastics in the first place, rather than simply focus on corrective measures. There is an urgent need to reduce the volumes of synthetic fibres in textile production, and clear targets to achieve this by 2030 and beyond should be set.

2. Facilitate resource-sufficient consumption: the role of consumer information

While we all have a responsibility to consume less and better, consumers expect products to be sustainable by default and affordable. While mandatory design requirements will be crucial to deny market access to unsustainable products, reliable and transparent information as well as well-designed price signals will be key to steer more sustainable choices.

2.1 Substantiating Green Claims

Minimum requirements for textiles should be complemented by better consumer information on textile products so that information can allow consumers to make sustainable choices.

For the textile products which are granted EU market access (i.e. those that meet the minimum

⁷ IUCN (2017), *Primary microplastics in the oceans: A global evaluation of sources*, IUCN International Union for Conservation of Nature, <http://dx.doi.org/10.2305/iucn.ch.2017.01.en>.

requirements) we need strict rules about what sustainability claims can be made so as to avoid unsubstantiated green claims. This will be increasingly important for the textile industry given the 'growing social trend for sustainability in the EU textile and fashion industry', as identified by the Roadmap.

There is a clear role to play for the Product Environmental Footprint Category Rules (PEF-CR) for apparel and footwear in the substantiation of green claims through the provision of reliable, comparable, and verifiable information on textile products. However, we have reservations about the use of PEF to develop a B2C textile label due to the granularity of scope. In addition, the PEF does not offer consumers and other stakeholders information on the social impacts of the product's production. The European Commission's initiative to develop a product passport should become the vehicle for accessing PEF data which supports green claims.

2.2 Empower consumers for the green transition

The new initiative to empower consumers for the green transition⁸ can deliver information on sustainability, durability and reparability of products which can also relate to the textile sector. Consumers would benefit from knowing how long textile items are expected to last (e.g. number of washing cycles and years) and how they can be repaired. A pre-approval system of sustainability claims used by the textile sector and limits on advertising that encourages premature psychological obsolescence can help increase the 'emotional investment' made in a product and reduce unnecessary consumption⁹.

Furthermore, the initiative can help establish a white list of environmental labels for textile products. This should identify only Type 1 ISO ecolabels (e.g. EU Ecolabel, Nordic Swan, Blue Angel) and a small number of credible independently verified labels (e.g. GOTS and OEKO-Tex). The Textile Strategy can also be an opportunity to incentivise the use of the EU Ecolabel by industry while tightening its ambition to ensure that they will go beyond mandatory requirements, reflect best-in-class textiles and continue to differentiate frontrunner companies.

The Textile Strategy is also an opportunity to achieve 'low hanging fruit' aims in line with citizens' expectations and hopes for more environmental action¹⁰ through a ban on the destruction of textile products, including the destruction of excess inventory, deadstock and return items¹¹, as has been introduced in France.

3. Economic incentives to overhaul the business model

⁸ [EEB feedback to 'Empowering the consumer for the green transition' initiative](#)

⁹ Premature psychological obsolescence is the idea that products are not designed so that consumers want to keep them for a long time. Therefore, the Initiative should also consider that it is not necessarily due to low quality that clothing is discarded, it can also be due to the product having a low level of 'emotional durability' in the consumers' eyes.

¹⁰ Eurobarometer: https://ec.europa.eu/commission/presscorner/detail/en/QANDA_20_330

¹¹ The Commission committed to consider a ban on the destruction of unsold durable goods in the Circular Economy Action Plan.

3.1 Sustainable Public and Corporate Procurement

Economic incentives are vital for pulling the market beyond better than average performance. We welcome that the Roadmap mentions the potential to introduce targets to boost Green Public Procurement (GPP) for textiles. Updated GPP criteria for textiles¹² could foster the market for more circular textiles. To boost the EU market for sustainable and circular textiles, the Textile Strategy might consider not only setting targets for green public procurement in the EU, but also public procurement of textiles produced by socially responsible enterprises. Just as minimum requirements should make sustainable products the default choice for consumers, sustainable procurement should be the default choice for public and private organisations. There can be no justification why public authorities should be procuring sustainably when private companies can avoid their responsibility when it comes to sustainable sourcing – particularly when we consider that private companies compete with public services and/or they operate under a delegated mandate of public authorities.

3.2 Extended Producer Responsibility

Extended Producer Responsibility (EPR) schemes should be developed for all textile products placed on the market in every EU country. EPR can play a vital role for EU countries to meet the regulatory requirement of separately collecting textiles by 2025.

In keeping with the polluter pays principle, a producer's responsibility for a product's environmental impact must not be calculated based solely on the end-of-life stage. EPR fees must be eco-modulated according to environmental performance along the whole value chain and take into account the costs beyond waste management (i.e. the environmental impact of production) and the circularity potential of a product. Eco-modulated fees, ideally set at EU level, can therefore play a role in driving the uptake of better fibres and higher quality textiles. By going beyond looking at the end-of-life stage, an EPR scheme for textiles can provide meaningful incentives for resource-sufficient production, design for circularity, and closed loop (circular) practices with high quality recovered materials.

Decisions made about the spending of the EPR fee must be decided by a collegial committee made up of organisations implementing EPR obligations, private or public waste operators, local authorities, environmental NGOs, re-use and preparing for re-use operators and social economy enterprises. In addition to collection, reuse and recycling activities, EPR fees should be spent to support Ecodesign, sustainable innovations along the value chain and their uptake by the sector, and safe chemical substitution. EPR fees should be clearly ear-marked for waste prevention and social economy activities. To avoid conflicts of interest, in no case should producers and organisations implementing extended producer responsibility be solely responsible for the spending of the fee.

3.3 Sustainable Finance

The ongoing 'taxonomy' process to set criteria for which economic activity relating to the 'manufacture of textiles and wearing apparel' can be labelled as a sustainable investment must

¹² [GPP criteria for textiles](#)

reward activities which are in line with the waste hierarchy, efforts to phase out hazardous chemicals, circular production principles, and emissions reductions.

3.4 COVID-19 recovery funds

Any use of the COVID-19 Recovery Plan funds under the EU strategy for textiles must come with strict conditions for compliance with international labour, environmental and taxation rules and standards. Priority should go to supporting business models that promote the reduction of the use of virgin resources.

3.5 VAT to promote repair and reuse

The Textile Strategy can promote the setting of lower VAT rates for repair/remanufacture/reuse activities in the textile sector in order to make them accessible, affordable and more attractive compared with buying new products.

3.6 'Fossil fashion' tax

As noted above, the increase in microfibre shedding (microplastics) is the visible result of the explosion in polyester use. While all types of fibre are resource intensive, over the last two decades, synthetic fibres - made from fossil fuels - have gone from a 20% share of global fibre production to 62%.¹³ Staying on this trajectory is incompatible with global efforts to reduce climate emissions. Taxes on virgin synthetic fibres should therefore be considered.

4. Stopping the chemical overload

Around 3500 chemicals are known to be used in textiles manufacturing. Although the hazards of all these substances are not fully known, over 240 chemicals are considered to be of potential risk to human health and 120 of potential risk to the environment according to EU regulations.¹⁴ They can remain on the textile products we buy, and using them can be dangerous for workers, as well as the environment and communities around production sites when released into wastewater. Most pollution from hazardous chemicals occurs during production processes to treat, dye, print and finish fabric, so-called 'wet processes'¹⁵ which are also very energy-intensive. When washed during use, chemicals present in textiles are released and can also pollute local waterways in the EU.

In its 'Chemicals Strategy for Sustainability: Towards a Toxic-Free Environment'¹⁶, the Commission has committed to minimise the presence of substances of concern in textile products through the introduction of new requirements, as well as through the Sustainable Product Policy Initiative. We welcome that the Roadmap identifies that substances of concern

¹³ https://textileexchange.org/wp-content/uploads/2019/11/Textile-Exchange_PREFERRED-Fiber-Material-Market-Report_2019.pdf

¹⁴ [Rapport 3/15: Kemikalier i textilier – Risker för människors hälsa och miljön](#)

¹⁵ [Destination Zero report, 2018](#)

¹⁶ [Chemicals Strategy for Sustainability: Towards a Toxic-Free Environment](#)

hamper future high-quality recycling and that they cause pollution to water and soil.

Going beyond voluntary approach

When it comes to the use of hazardous chemicals in the production of textiles, the industry is currently heavily relying on voluntary measures (for example ZDHC) which only cover part of the sector and do not represent a comprehensive approach. While voluntary initiatives and certification do play a role in informing best practice, they cannot, and should not, replace governmental and international regulations.

It is therefore vital for new legislative measures to – as a minimum – restrict the manufacture, marketing, import, and export of textile products containing hazardous chemicals/substances for which there are available substitutes to minimise their presence in products. This should go beyond the list of SVHC and anchor the principle of substitution of hazardous substances by safer alternatives, or via the use of alternative materials or designs in products placed on the EU market.

The Textile Strategy and the Sustainable Product Initiative can address the prevention (i.e. disclosure and traceability) of the use of hazardous chemicals across textile value chains by setting requirements on chemicals of concern in both final products as well as those used in manufacturing.

We recommend:

- Setting requirements on the restriction, testing and disclosure of chemicals of concern *present in final products*
 - As a starting point, the Commission should extend the existing restriction on several substances that are carcinogenic, mutagenic or toxic to reproduction (CMR substances) to include all substances of concern (EDC, CMR, etc).
 - The Commission could also build on existing chemical requirements under the EU Ecolabel for textiles and make them mandatory within a given timeframe.

and;

- Setting requirements on the restriction, testing and disclosure of chemicals of concern *discharged to wastewater (before any wastewater treatment)* as a result of the most chemically intensive processes, usually wet processes such as bleaching, dyeing and printing, but also during the production of fibres, for example viscose and modal. Testing should take place both before and after wastewater treatment.

The Commission should also ensure that the thresholds they establish for hazardous chemicals in wastewater discharges and their presence in textiles subject to ongoing restrictions are as low as possible to allow enforcement and ensure non-intentional use (e.g. PFAS).

Traceability of chemicals through a product passport

Given the complexity of the textile supply chain, the Commission should also set requirements

on the *traceability and disclosure of information on all chemical ingredients* used throughout the supply chain. This can be implemented through product harmonised information systems and/or the new initiative for a product passport (see section 1.2).

Setting the new chemicals requirements: a robust process

These requirements should go beyond national regulatory requirements and international standards and be set through an independent process. EU standards should apply to all imports and cover manufacturing in third countries, as workers and local communities are often exposed to discharges from sub-standard factories.

To inform the setting of these chemical requirements, the Commission must:

- Conduct an analysis of existing voluntary standards for safe chemical management (for example, the waste water testing guidelines of the ZDHC programme, Oeko-Tex, Bluesign, AFIRM, EU Ecolabel, the Nordic Swan and equivalent, and the value chain disclosure of these testing results via platforms such as the Institute of Public & Environmental Affairs (and to a lesser extent ZDHC Detox Live). The Commission should require the disclosure of wastewater testing results for hazardous chemicals from textiles wet processing facilities on the European Pollutant Release and Transfer Register (PRTR), to enable documentation of the problem and encourage facilities and their clients to eliminate the use of hazardous chemical inputs leading to their presence in wastewater.
- Conduct an assessment of the hazardous substances (on their own or in mixtures) most commonly used in the manufacturing value chain (inside and outside the EU), beyond the REACH SVHC list. The Commission should make use of best practice Manufacturing Restricted Substances Lists available via industry initiatives and certifications (see above), with particular attention put on addressing chemicals on a group basis where possible, and inclusion of Persistent Mobile and Toxic Chemicals.
- Conduct a gap analysis on hazardous substances addressed by existing voluntary standards for safe chemical management (which largely focus on chemicals used at the last stages of the production value chain, such as the textile wet-processing stage that includes textile dyeing, printing and finishing) in order to identify and address hazardous chemicals used throughout the entire supply chain.

5. Real corporate accountability: Human Rights and Environmental Due Diligence

While the Roadmap references the impact of COVID-19 on the EU textile industry, it falls short of specifically acknowledging the massive impact that COVID-19 has had on the millions of textile industry workers in low-income countries who were left without vital income or social protection when brands responded to the COVID-10 crisis by not paying their suppliers for both completed and in-process orders.

COVID-19 has compounded the existing injustices which have been associated with the textile sector for decades: poor working conditions; low wages; long working hours; limits to freedom of association and collective bargaining, as well as barriers to accessing remediation for violations and gender-based violence and inequalities¹⁷.

The Textile Strategy must complement the ongoing initiative¹⁸ towards an EU Human Rights and Environmental Due Diligence (HREDD) Directive.

An effective cross-sectoral HREDD Directive must obligate businesses to respect human rights and the environment in their own operations, in their global value chains and within their business relationships; and, to identify, cease, prevent, mitigate, monitor and account for potential and actual human rights and environmental adverse impacts through an ongoing due diligence process, in accordance with existing international due diligence standards. Business enterprises must provide for or cooperate in the remediation of adverse impacts in their global value chains and within their operations and business relationships, and they must be liable for human rights and environmental adverse impacts in their global value chains and within their operations and business relationships.¹⁹

Addressing gender equity must also fall within the scope of the Textile Strategy.

¹⁷ The global fashion industry is one of the most female-dominated industries in the world, and these women are overrepresented in the most vulnerable and marginalised positions in the industry where they work for poverty wages and under harsh conditions.

¹⁸ <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12548-Sustainable-corporate-governance>

¹⁹ <https://corporatejustice.org/eccj-publications/16828-principal-elements-of-an-eu-due-diligence-legislation>