

To: **Members of the European Parliament - Environment Committee**

Subject: include textiles and electronics in the scope of an immediate ban on the destruction of unsold goods

26th May 2023

Dear Members of the European Parliament ENVI Committee,

The destruction of unsold products represents the most wasteful scenario conceivable in a linear economy. All upstream pollution involved in bringing a product to the market, including those related to the extraction of raw materials, manufacturing, assembly and distribution take place without delivering any utility to society. The 46 undersigned NGOs and business associations urge Environment Committee members to support an immediate ban on the destruction of unsold textiles and electronics. This letter illustrates that there is sufficient evidence and a robust case to support a ban for textiles and electronics in Article 20 of the Ecodesign for Sustainable Products Regulation.

The case for textiles

A huge share of all textiles are unsold, estimated at 4.1% in Franceⁱ and 6% in the Netherlandsⁱⁱ. Though some of these products are re-sold in secondary markets, a considerable share are destroyed, estimated to be 11%ⁱ in France and 6% in the Netherlands. In Norwayⁱⁱⁱ and Denmark^{iv} 825 and 677 tonnes of clothing are unsold and/or destroyed each year respectively.

In the case of t-shirts alone it is estimated that between 11 and 32 million new t-shirts are destroyed in the EU each year. This results in up to 220,000 tonnes of CO₂eq, 35 billion litres of water use, 12,300 tonnes of wasted cotton, and 1.9 million litres of wasted oil. Across the whole textile sector the carbon footprint of unsold destroyed textiles in the EU is between 1.2 and 3.3 Mt of CO₂eq.^v

The report on the Textile Strategy^{vi} has now paved the way for a ban on the destruction of unsold textiles; and the Council's General Approach further supports a ban for textiles, though with an unnecessarily long 36 month delay.

The case for electronics

Electrical and electronic equipment continue to be one of the fastest growing waste streams in the EU, with an annual growth rate of 2%. E-waste has proven to be a challenging waste stream with low collection rates (less than 40% of electronic waste is recycled in the EU^{vii}). Closely related digital services account for 4.2% of European GHG emissions, 54% of this results from the manufacturing of equipment.^{viii}

Analysis from France suggests that around 1% of all electronic appliances remain unsold and destroyed each year.ⁱ In the case of just microwaves and kettles alone, it is estimated that 98,000 and 140,000 units are destroyed respectively each year. For these two products this represents 25,000 tonnes of CO₂eq, 690 tonnes of steel, 110 tonnes of glass, 2 million litres of water annually.^{ix} The electronics sector comprises 1000s of product groups with a growing diversity.

Opportunity and recommendations

Ending the destruction of unsold goods will bring a number of benefits:

- *Reducing environmental impacts and preventing waste from the textile and EEE sectors*
- *Promoting industrial design and management innovation towards ending overproduction in the first place*
- *Remaining unsold goods provide an opportunity for secondary markets, for example feeding refurbishers and social economy actors with new products and parts*
- *Supporting strategic autonomy by reducing Europe's economic dependency on natural resource depletion, including for Critical Raw Materials*

The economic opportunity of finding new markets and utility for unsold products should not be underestimated. Projections show the value of destroyed electronics and clothing in the EU will amount to €21.74 billion by 2022, which is larger than the entire GDP of Cyprus for the year 2020. If no policy measures are taken, this could increase to up to €71.29 billion by 2030, as much as the revenue generated by the entire German e-commerce market in 2019.^x

Key recommendations for the ENVI Committee:

- Support an **immediate ban** for the destruction of both unsold textiles and electronics
 - with no more than a delay of 12 months after the entry into force.
- **Include medium size enterprises** in the scope of the ban, noting these companies have revenues up to 43 million EUR and overall SMEs are responsible for 60% of CO2 emissions and pollution.^{xi}
- Support **broad definitions of textiles and electronics**. The definition of EEE can be taken from the WEEE Directive (2012/19/EU), while the definition of textiles should include clothing, footwear and household textiles at a minimum.
- Find a robust solution to the risk that **many unsold products which are reported to be sent for recycling will ultimately be destroyed** anyway. This reality could undermine the objectives of this provision and divert usable products away from preferable solutions such as resale or refurbishment.

Yours faithfully,

[please see the supporting organisations on the following pages]

Back Market



Changing Markets FOUNDATION

Deutsche Umwelthilfe

Danmarks Naturfredningsforening



de TRANS FORMISTEN



EUREFAS European Refurbishment Association

Fair Trade ADVOCACY OFFICE

ecos

EN MODE CLIMAT

EEB European Environmental Bureau

fvs FUNDACIÓN vida sostenible

fixfirst

FRANCE NATURE ENVIRONNEMENT



Free ICT Europe



Friends of the Earth Europe

hej!support health · environment · justice

Future in our hands

Zaľā brīvība



GREEN TRANSITION DENMARK

HÖP HALTE À L'OBsolescence PROGRAMMÉE

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industriAll EUROPEAN TRADE UNION

Ingenieria Sin Fronteras

Les Amis de la Terre France

mwe MUNICIPAL WASTE EUROPE

POLSKIE STOWARZYSZENIE ZERO WASTE

RCUBE Fabrikation du Réemploi & Réparation

Recycling Network Benelux

re!commerce

refurbed

REPAIR & SHARE



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RIGHT TO REPAIR

rreuse

Setem



voice

VSI ŽIEDINĖ EKONOMIKA www.circulareconomy.lt

waag futurelab

zero.

ZERO WASTE EUROPE

Organisation

BackMarket	Refurbishment business, France
CATAPA	NGO Belgium
Changing Markets Foundation	Foundation, UK
Danish Society Nature Conservation	NGO, Denmark
De Transformisten vzw	NGO, Belgium
Društvo Ekologi brez meja	NGO, Slovenia
DUH	NGO, Germany
ECOS	NGO, international
En mode climat	Business association, France
European Environmental Bureau	NGO, international
Eurefas	Business association, international
Fair Trade Advocacy	NGO, Belgium
Fixfirst	Software company, Germany
France Nature Environnement	NGO, France
Free ICT Europe	Business association, international
Friends of the Earth Europe	NGO, international
Fundación Vida Sostenible	Foundation, Spain
Future in our hands	NGO, Norway
Green Liberty	NGO, Latvia
Green Transition	NGO, Denmark
Halte à l'Obsolescence Programmée (HOP)	NGO, France
HEJ! Support	NGO, Germany
iFixit	Repair business, international
IndustriAll European Trade Union	Trade Union, international
Ingeniería Sin Fronteras	NGO, Spain
Les Amis de la Terre	NGO, France
Municipal Waste Europe	Business association, international
Polish Zero Waste Association	NGO, Poland
RCUBE	Reuse Federation, France
Recommerce	Refurbishment business, France
Recycling Network Benelux	NGO, Netherlands
Refurbed	Refurbishment business, Austria
Repair & Share vzw	NGO, Belgium
Repair Together asbl	NGO, Belgium
Restart Project	Repair network, international
Right to Repair Europe	Repair network, international
RREUSE	Reuse network, international
SETEM	NGO, Spain
Share & Repair Network	Repair network, Scotland
Umwelt Dachverband	NGO, Austria
VOICE	NGO, Ireland
VšĮ "Žiedinė ekonomika"	NGO, Lithuania
Waag Futurelab	Research group, Netherlands
ZERO	NGO, Portugal
Zero Waste Europe	NGO, international

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