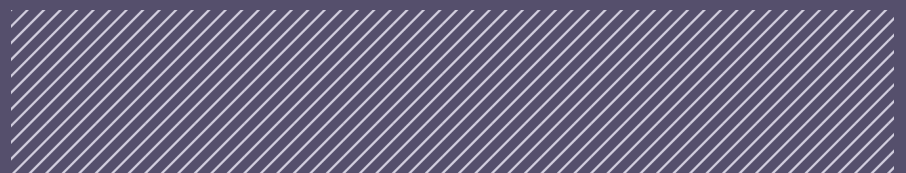


Proposal for an EU Green Recovery Plan in the Tex- tile, Apparel and Footwear Industry

June 2020



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Need for green recovery principles boosting the economy and circularity

The COVID-19 pandemic has been a shock to the global economy. The textile, apparel and footwear industry is one of the industries that have been hit particularly hard. Closed retail businesses and declining consumer spending are causing a tremendous decrease in sales worldwide. The industry can expect a slump in global sales of 28–38% during the course of 2020.ⁱ As a consequence, many companies already face severe financial challenges in terms of cash flow and liquidity as well as solvency concerns. The distress on the sector is not likely to ease soon with large amounts of overstock and consumer demand only slowly picking up post-restrictions.ⁱⁱ The pandemic also wears heavily on workers' livelihoods across the entire supply chain. Many of the 1.7 million workers employed by the apparel and footwear industry in Europe aloneⁱⁱⁱ are at risk of furloughs and lay-offs. Both environmental and social perspectives are deeply intertwined and shall be jointly considered for the sustainable development of the industry.

The pandemic comes at a time where sustainability programs and commitments are increasingly becoming the norm in the industry, consumer pressure is rising and first steps towards a circular economy and carbon neutrality have already been taken. This has been accompanied by policy initiatives such as the EU Circular Economy Action Plan. The crisis and its consequences now pose a risk of slowing down the fight against climate change or delaying commitments to circularity which had just started to gain momentum. While solutions for mitigating the impacts of lockdowns and store closures are at the top of the agenda in the immediate pandemic situation, previous crises have shown the potential to accelerate green transformation.^{iv} They have also illustrated the need for companies to prepare for a new normal as part of their crisis management. The ongoing pandemic can be a turning point for accelerating the building of a circular, resilient and carbon-neutral economy, while creating new businesses and job opportunities in Europe.

Making the economy more circular needs to be a joint effort by consumers, industry and policy-makers alike, and should build on existing commitments and initiatives. Consumers increase their expectations and favour value-led brands acting responsibly and sustainably during the crisis.^v Despite facing economic issues, more than 70% of European consumers see climate change as a more serious challenge than the pandemic,^{vi} again outlining the public demand for a commitment to climate goals. While continuing to work towards already established goals, the textile, apparel and footwear industry is committed to accelerating the circular transformation of products, business models and the value chain. Therefore, the Policy Hub welcomes the proposal of the European Commission to create a new recovery instrument called Next Generation EU as well as to reinforce the long-term EU budget for 2021–2027 in line with the European Green Deal, as stated by Ursula von der Leyen, *'The recovery plan turns the immense challenge we face into an opportunity, not only by supporting the recovery but also by investing in our future: the European Green Deal and digitalisation will boost jobs and growth, the resilience of our societies and the health of our environment'*.^{vii}

Building on the proposal for a recovery plan put forward by the European Commission, the Policy Hub suggests that EU Member States and EU Parliamentarians consider seven key principles when detailing and implementing the EU Recovery Plan to ensure economic recovery, while advancing the development towards a circular economy. The seven key principles have been defined with a twofold ambition of short- and long-term instruments balancing direct financial support, incentive-based policy instruments and legislation. On the one hand, the next wave of short-term government support should target liquidity and solvency concerns of companies with fiscal measures incentivising engagement in circularity while continuing to support the recovery of the

sector. This suggestion is detailed in principle 1-3 building on REACT-EU and the Solvency Support Instrument presented by the European Commission. On the other hand, this proposal calls for legislative measures and investments in green projects required now to achieve real progress in the medium to long term. This should ensure that pre-crisis ambition will be maintained and that efforts are stepped up in selected areas. Building on the proposal of the European Commission to strengthen InvestEU as part of Next Generation EU, this suggestion is detailed in principle 4-7.

Short-term measures: Next 12 months

1. Leveraging short-term government support to foster green engagement and commitments
2. Providing tailored support for companies linked to circular economy, especially for SMEs
3. Encouraging a shift in demand towards greener choices and circularity

Medium- to long-term measures: Up to 5 years

4. Supporting innovative low-carbon activities
5. Accelerating circularity by helping to scale up technologies and setting up infrastructure for collection, sorting, reuse and high-value recycling
6. Promoting circular design and a more sustainable material mix
7. Incentivising increased transparency to accelerate the transition to circularity and to empower the consumers

Short-term measures

1. Leveraging short-term government support to foster green engagement and commitments

Severely impacted by the lockdowns, the textile, apparel and footwear industry faces cash-flow, liquidity and immediate solvency concerns, resulting in a potential increase in unemployment and reduction in tax revenue. Direct financial support and fiscal stimulus packages by the European and national authorities can contribute to saving jobs and also enable direct investments in a healthier, more resilient and circular supply chain. The Policy Hub encourages the European Commission and EU Member States to guide their investments in a direction that is compatible with the political ambition outlined in the European Green Deal and the EU Circular Economy Action Plan, while preventing a potential slowing down of engagement due to the crisis. Therefore, the Policy Hub calls for dedicated government support; for example, in the form of loans, guarantees or equity, as well as grants and subsidies to be conditional upon green and circularity commitments. For defining these conditions, companies' existing engagement in circularity and climate action or the clear obligation to set targets and define roadmaps contributing to carbon neutrality by 2050 should be taken into account.

- **Conditional loans:** Conditional loans from the European Investment Bank, European Investment Fund, or national banks for European apparel and footwear corporations and suppliers should be tied to engagement in or commitments to sustainability, such as existing GHG emission reduction targets validated by the Science Based Targets initiative (SBTi) or a clear commitment to develop reduction targets in line with the SBTi, and respect for human rights by

adhering to the UN Guiding Principles on Business and Human Rights and implementing effective due diligence in alignment with the Guiding Principles and guidelines such as the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

- **Green project loans:** Financial support for projects aiming at reducing environmental impact, like energy efficiency, green buildings or more efficient production technologies and processes.
- **Incentivising green energy in in-house operations:** Subsidies for companies to switch to renewable energy sources, such as solar and wind, in their own operations or to use sustainable fuels in their logistics services or switch to logistic suppliers with low-carbon fuels – based on commonly-agreed certification schemes.

2. Providing tailored support for companies linked to circular economy, especially for SMEs

The next wave of government support has to go beyond resolving cash-flow concerns and provide funding to accelerate green growth, like for the development and scaling of circular, innovative, high-growth start-ups and businesses. The Policy Hub calls for tailored support mechanisms for all types of companies contributing to a circular textile economy, such as focusing on repair, rental, resale, or sharing services or engaging in textile waste collection and waste sorting processes or techniques. SMEs should be a particular priority, as their limited financial resources and greater challenges in accessing capital could lead to a higher risk of insolvency.^{viii} Investments have historically proven to have a stronger multiplier effect on GDP than tax cuts^{ix}, and the crisis in the 1930s already exhibited the potential of innovation to create growth and reduce unemployment.^x This correlation is even more relevant now with green innovation having the potential to create new markets. Beyond the impact of public investments, an increase in public funding can also unlock private sector investments as outlined by previous engagement within the Horizon program, where €1.00 invested by Horizon 2020 generated €1.60 of private investment on average.^{xi}

- **Increase in EU funding for the development and scaling of businesses linked to circular economy:** In line with the European Civil Society Strategy,^{xii} the Policy Hub emphasises the need for increasing financial support in the form of loans, guarantees and equity for innovative SMEs and start-ups linked to circular economy from early-stage development to growth and expansion, potentially building on existing programs such as Horizon 2020, LIFE or EIC Accelerator.
- **Funding support for independent designers and entrepreneurs:** Dedicated equity and funding support for independent designers and entrepreneurs working on projects focusing on circularity.
- **Incentives for temporary tax deferrals and reductions:** Incentivise EU Member States to impose temporary tax deferrals and reduction for circular businesses, like tax or social security deferrals and exemptions, such as deferral of employer payroll taxes to balance the particularly high labour costs common to circular business models or a reduction in or moratorium on corporate income and profit taxes.
- **Increase in EU funding to support reskilling:** Building on the proposal of the European Commission to strengthen the Just Transition Fund, the Policy Hub calls for employers to support the transition to a circular economy; for instance, by initiating up- and reskilling programs for

workers. This could help meet emerging needs in areas such as digitalisation and repair, re-selling and recycling services. It would also promote a strengthening of the European markets for recycling and new circular business models.

3. Encouraging a shift in demand towards greener choices and circularity

The European Commission and the EU Member States should build on the trend observed in consumer behaviour where environmentally and socially responsible brands and products are favoured.^{xiii} This would imply continuing to ensure that citizens have the information they need about products and services to make informed decisions, while also adopting other policy tools aimed to try to steer the market in a more sustainable direction. One example is tax reduction supporting the competitiveness of circularity.

- **Incentives for VAT reduction for circular business models:** The Policy Hub supports the application of preferential VAT rates on repair, rental, resale, or sharing services, for instance. One example of this is Sweden where the VAT on repair businesses went from 25% to 12% in 2017.
- **Incentives for VAT reduction on textiles with circular attributes:** The Policy Hub would also support a reduction in VAT for textiles clearly demonstrating circular attributes, such as recycled materials. This shift requires a harmonised definition of a circular product in the textile, apparel and footwear industry. The Policy Hub is willing to lead the discussion in detailing this proposal.
- **Subsidies for promoting demand for circular business models:** Providing incentives to increase consumer awareness and information to guide demand towards circular business models; for example, with consumer awareness campaigns addressing perception barriers of reuse, re-selling, and purchasing second-hand, or campaigns encouraging a prolonged utilisation of items and choosing circular options for product maintenance and care.
- **Subsidies for green vouchers for consumers:** Incentivising EU Member States to impose green vouchers for consumers to purchase textile items that are, for instance, second-hand, certified, repaired, rental, or demonstrate circular attributes and/or the use of materials with demonstrated lifecycle environmental footprint benefits. This program could be tied to existing initiatives in other industries in the Member States, such as EcoCheques in Belgium.
- **Incentivising green public procurement (GPP):** Increase in GPP practices for circular textile products and services building on the EU GPP criteria for textile products and services, and based on a standardised method for the evaluation of environmental performance. Existing initiatives in the Member States already exist; for example, the Dutch Ministry of Defence has committed to buy textiles with at least 10% recycled material.

Medium- to long-term measures

4. Supporting innovative low-carbon activities

Combatting the impacts of climate change and achieving an absolute reduction of GHG emissions in the industry to mitigate further global warming must remain a priority. This is regardless of the need to focus on responding to immediate business pressures arising from the pandemic and operating in an environment where oil prices are at an all-time low. Goals outlined in the European Green Deal, including a minimum 50% emission towards 55% reduction target for 2030 and carbon neutrality by 2050, must stay at the top of the agenda for the European authorities

and corporations, binding targets for the share of renewable energies by 2030 across Europe, on top of national targets. Delaying these goals or the action path towards them by softening corporate responsibility commitments should not be an option. In addition to existing ambitions, the Policy Hub wants to emphasise the need for government support and regulatory frameworks to facilitate the switch to energy-efficient technologies and processes.

- **Incentives and funding for energy-efficient technologies and processes:** Incentives and release of CAPEX funding for investing in the early deployment of energy-efficient or carbon-neutral technologies, for the implementation of energy efficiency solutions in companies' operations or for the development of new processes; for example, wet processing, water reuse and energy savings.
- **Accelerating renewable energy market in Europe:** Providing incentives to expand the underlying infrastructure and make renewable energy accessible in every market, to support the industry in pursuing renewable energy strategies.
- **Funding support for R&D:** Increase in funding support for innovation in clean fuels and sources of energy, and innovative, low-carbon production processes, such as with additional funding for Horizon Europe as suggested by the European Commission's proposal for a recovery plan.
- **Contributing to the exploration of a carbon taxation framework:** The Policy Hub will investigate its contribution to the debate on an impact-focused carbon taxation framework by assessing feasibility and different methodological approaches in order to find an appropriate solution for different sectors. This could in the long-term also balance higher public spending and create a source for fiscal revenue.

5. Accelerating circularity by helping to scale up technologies and setting up infrastructure for collection, sorting, reuse and high-value recycling

Accelerating the scaling of recycling technologies now can enable the EU to lead in building an industry layer that provides textile recycling capacity locally in Europe under the premise of clean, climate-neutral and sustainable processes. This approach would strengthen the European Union's position, reduce dependencies on raw materials and resources, improve its profitability and competitiveness, and create job opportunities in the phase of economic recovery. Therefore, the Policy Hub agrees with the European Commission's emphasis on innovation when it comes to end-of-life management, outlined in the EU Circular Economy Action Plan, to reduce the use of virgin resources and waste and to build a market for recycled materials. The Policy Hub calls for making the following measures a top priority to ensure real impact in the medium to long term.

- **Financing of and investing in waste classification technologies and high-value recycling technologies:** Mobilising financial resources for expanding the European industry by investing in developing and scaling up promising waste classification technologies and high-value, like-to-like recycling technologies (near-infrared, mechanical or chemical), potentially using EU funds such as Horizon or LIFE, or circular economy programs of the European Investment Bank. This is closely linked to EPR framework outlined below.
- **Harmonised end-of-waste criteria:** Developing end-of-waste criteria at EU-level that ensure secondary raw materials and post-consumer waste are recognised as resources and not as waste as currently in the WFD, would create enabling infrastructure and high benefits for the industry. This would solve current barriers in waste trade flows across borders within the EU

and outside the EU caused by the classification of these materials as waste; for instance regulatory barriers for trade flow of waste, recycled intermediate products and waste scraps.

- **Extended producer responsibility (EPR):** Defining an EU-wide framework for EPR for textiles, including a set of common principles, a clear scope and allocation of responsibilities among all relevant stakeholders, a robust mechanism of monitoring, control and surveillance with equal rules and proportional financing and maximum transparency. Working jointly to set the right foundations of EPR schemes for textiles can help provide workable solutions to used textiles, boost the recycled materials market and support robust green claims in products, creating tangible, long-lasting value for people and planet alike. Furthermore, collaborative research on how EPR and the eco-modulation of fees can be a workable and effective solution in practice to push circularity and to encourage transparency should be considered.
- **Incentives for the installation of waste collection circuits and take-back textile programs:** The Policy Hub calls for exploring different options for setting up collection and sorting facilities, defining a framework and paving the way for the EU Waste Framework Directive (WFD) that requires the EU Member States to set up separate collection of textiles by 2025.
- **Monetary incentives to find sustainable solutions for overstock and unsold products:** Creating dedicated monetary incentives for companies to mainstream sustainable options for inventory processing to retain the highest value possible of unsold products and overstocks. Options could include redesigning, repurposing, remarketing, renting, sharing, apparel-as-a-service platforms and high-value recycling. The EU could financially support promising pilots to accelerate the speed of scaling potential solutions. The overall focus should remain on minimising overstock and pre-consumer waste.

6. Promoting circular design and a more sustainable material mix

As outlined, strengthening the European market for recycled materials can contribute to Europe's economic recovery. It can also contribute to reaching the EU's climate goals, as recycled materials produce less CO₂ emissions than the conventional equivalent.^{xiv} An underlying prerequisite is circular design of products that ensures recyclability is factored in from the beginning. Here, the Policy Hub refers to its position paper *Better design for greater circularity*^{xv} to re-emphasise the importance of maintaining the outlined ambitions and perspective on circular design. Existing tools such as the Higg Materials Sustainability Index (MSI) can provide additional insights into materials' impact on the environment.^{xvi} In light of a green recovery plan, the Policy Hub additionally calls on the European Commission to increase investment in research and development in order effect real change in the long term.

- **Definition of circular and sustainable products in the product policy framework:** The Policy Hub welcomes the European Commission's announcement to publish a comprehensive product policy framework and looks forward to collaborating and discussing it with the European Commission and other stakeholders. The product policy framework should be flexible enough to adapt itself to future innovations, which may influence the definition of circular and sustainable products in coming years.
- **Dedicated research funds for material innovation:** Europe-based companies or research institutions should be supported financially for developing innovative, sustainable raw materials and for scaling up existing solutions. As a foundation, this requires a harmonised definition of what 'sustainable' products and materials entail in the textile apparel and footwear industry (as outlined in the previous bullet).

- **Funding of R&D in circular design:** The funding of research and development of public or private institutions in the area of circular design, enabling design innovation according to product type and supporting all sustainable solutions equally, and training of designers and commercial teams in circular design.
- **Supporting evaluation of material mix performance:** The European Commission should support companies to equip themselves with the right tools to properly evaluate the environmental impact of the design and material mix.

7. Incentivizing increased transparency to accelerate the transition towards circularity and to empower the consumers

The transition towards circularity requires the development and scaling up of an enabling infrastructure to ensure transparency and traceability. The industry has already worked on developing tools to manage its global supply chains and consider both environmental and social impact, and it is willing to continue to advance this process. However, building on the set of short-term measures guiding consumer demand towards green choices outlined in principle 3, it requires legislative instruments supporting the industry in increasing the level of transparency and traceability. Building on the momentum of shifting consumer preferences towards responsible and sustainable products accelerated by the crisis, transparency through trustworthy, harmonized, clear and accessible information can empower consumers to make sustainable choices for the environment, people and communities. The Policy Hub welcomes the European Commission's transparency ambition stated in the EU Circular Economy Action Plan as well as the ambition to define a Product Environmental Footprint (PEF) methodology as a tool to substantiate green claims. As part of an economic recovery plan, the Policy Hub calls for increasing efforts in this area and a joint effort of the industry and government bodies with two purposes in mind: setting-up an enabling framework in this area through new funds, partnerships, and pilot projects and creating greater transparency for consumers, through easy-to-digest information and easier access to information.

- **Development of the PEF methodology and preparation of the implementation:** The Policy Hub supports the continuation of the development of a PEF methodology.
- **Supporting supply chain mapping:** The European Commission should support companies in equipping themselves with the right tools to properly map the supply chain and identify the social and environmental performance of their partners.
- **Disclosure of minimum product information:** Explore the definition of a set of minimum product information to be disclosed for textile items on the EU market to accelerate the transition towards circularity. In this context, the industry is welcoming exploring the homogenization of standards.
- **Public-private partnership to provide technological infrastructure:** In order to enable transparency, new digital technologies must be deployed that support the collection, monitoring and reporting of data along the value chain, including customer and end-of-use phase. The Policy Hub calls for public-private partnerships to establish a framework for the underlying infrastructure for a digital platform and investigate technological options. In this context, exploring the digitalisation of evidence and standards to ensure verification and assurance would be appreciated.
- **Digitalisation:** The EU should mobilise the potential of digitalisation of product information, adding to available information and evidence-based approaches to define, jointly with the

industry, the content and methodology behind different solutions, such as digital passports, tagging and watermarks.

Conclusion and outlook

Through these seven key principles, the Policy Hub provides its initial contribution to the EU Green Economic Recovery Plan for the textile, apparel and footwear industry. This proposal outlines measures to provide short-term financial support for companies, and contribute to economic recovery for the EU, as well as to equip the sector to fully embrace the European Green Deal goals and accelerate the transition towards a circular economy. Combined with the industry's strong willingness to bring about change and changing consumer behaviour, this will serve as a foundation to work together towards more resilient supply chains and help to mitigate the climate crisis.

Looking beyond the EU, addressing the impact of the pandemic on producing countries by working with industry organisations and other key stakeholders to develop broad-based approaches should remain an essential part of the work. The European Commission should continue their dialogue and trade agreements in affected countries with the local companies and governments to identify what type of support is most needed, provide support where possible and jointly work towards the ambition of the ILO. Furthermore, it should be discussed how long-term partnerships with brands and manufacturers could be incentivized to help enable the industry to utilize the recovery to build these long-term relationships resulting in mutual trust and empowered workplaces.

The Policy Hub looks forward to joining a discussion on the outlined principles for an EU Green Economy Recovery Plan and will be happy to share additional proposals to promote circular economy in a broader sense than a green recovery for example under the EU Textile Strategy debate.

Authors

The Policy Hub, with support of Boston Consulting Group (BCG), are presenting this proposal, based on inputs and discussions with the partners of the Policy Hub – the Sustainable Apparel Coalition (SAC), the Federation of the European Sporting Goods Industry (FESI) and the Global Fashion Agenda (GFA) - and the Policy Hub members, representing more than 300 brands, retailers, manufacturers and other stakeholders. This proposal also received input from Amfori, European Environmental Bureau (EEB) and WWF, who were consulted during its development.^{xvii} This view is based on the circumstances of June 2020 and should be adapted accordingly to upcoming changes or a specific national or institutional context. We aim to continually update this work as a living document and detail elements as we move forward.

About the Policy Hub

The Policy Hub is an initiative launched in May 2019 by the Sustainable Apparel Coalition, Federation of the European Sporting Goods Industry, Global Fashion Agenda and their members to develop and promote a unified European policy framework that accelerates the transition to a circular system for the apparel and footwear industry, incentivises environmental performance at all stages of product life cycle and stimulates innovation and new business models.

The Policy Hub seeks to foster cross-stakeholder collaboration within apparel and footwear's global value chain and open dialogue with policymakers to jointly drive forward a circular economy agenda that generates new and sustainable competitive advantages for Europe and brings benefits to society at large and to the planet.

About Boston Consulting Group

Boston Consulting Group partners with leaders in business and society to tackle their most important challenges and capture their greatest opportunities. BCG was the pioneer in business strategy when it was founded in 1963. Today, we help clients with total transformation – inspiring complex change, enabling organizations to grow, building competitive advantage, and driving bottom-line impact.

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Annex – Definitions

The following definitions are based on a mix of internationally agreed notions (EU, Ellen MacArthur Foundation, ISO) and wording proposals from across the apparel and footwear industry for definitions where there is no pre-existing norm.

Circular economy (Ellen MacArthur Foundation)

A circular economy is an economic system where products and services are traded in closed loops or ‘cycles’. A circular economy is characterised as an economy which is regenerative by design, with the aim to retain as much value as possible of products, parts and materials. This means that the aim should be to create a system that allows for the long life, optimal reuse, re-furbishment, remanufacturing and recycling of products and materials.

End-of-waste status (EU definition)

Substance or object ceasing to be waste after a recovery operation (including recycling) if complying with specifically regulated criteria in accordance with the following conditions:

- is commonly used for specific purposes
- there is market or demand – fulfils the technical requirements for the specific purposes and meets the existing legislation and standards applicable to products
- its use does not lead to overall adverse environmental or human health impacts

EPR (extended producer responsibility – OECD)

An environmental policy approach in which a producer’s responsibility for a product is extended to the post-consumer stage of a product’s life cycle.

PEF (Product Environmental Footprint – EU definition & Higg Index)

Harmonised, life-cycle based methodology for the calculation of the environmental footprint of products (including carbon).

Recyclable (wording proposal from across the apparel and footwear industry in the absence of a pre-existing norm)

A product that can be processed and recycled within commercial recycling processes where the recycled material becomes a raw material that can be reintroduced in the production of new products.

Recycling (EU definition)

Recycling means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.

Recycled materials (wording proposal from across the apparel and footwear industry in the absence of a pre-existing norm)

Materials (fibres, yarns, or fabrics) made from the recycling process of ‘used products’ and ‘secondary materials’ and are suitable for the production of new products, such as garments, instead of or alongside virgin raw materials.

Reuse (EU definition)

Any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.

Secondary raw material (EU Parliament)

Recycled materials that can be used in manufacturing processes instead of or alongside virgin raw materials.

Sustainability (ISO definition)

State of the global system, which includes environmental, social and economic subsystems, in which the needs of the present are met without compromising the ability of future generations to meet their own needs.

Waste (EU definition)

Any substance or object which the holder discards or intends or is required to discard.

Endnotes

- ⁱ Sustainable Apparel Coalition, Higg Co and the Boston Consulting Group. Rebuilding a More Sustainable Fashion Industry After COVID-19, 2020
- ⁱⁱ BCG COVID-19 consumer sentiment survey. April 2020
- ⁱⁱⁱ European Environmental Agency. Textiles in Europe's circular economy. 19 November 2019.
- ^{iv} Mariana Mazzucato and Carlota Perez (2014). Innovation as Growth Policy: The Challenge for Europe. Science Policy Research Unit. Working Paper Series SWPS 2014-13
- ^v BCG report on "COVID Consumer Sentiment Snapshot #2, #4 and #6"
- ^{vi} Ipsos MORI; 28,039 online adults aged 16–74; fieldwork dates 17-19 April 2020
- ^{vii} European Commission. Press release 27.05.2020. Europe's moment: Repair and prepare for the next generation. Retrieved from: https://ec.europa.eu/commission/presscorner/detail/en/ip_20_940
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- ^{xi} European Commission, "Horizon 2020 SME Instrument Impact Report," Innovation Kitchen, 2018. Retrieved from https://ec.europa.eu/easme/sites/easmesite/files/smei_2018_impact_report_final_may_2018.pdf.
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- ^{xiii} BCG COVID-19 consumer sentiment survey. April 2020.
- ^{xiv} Global Fashion Agenda and Boston Consulting Group, Pulse of the Fashion Industry 2018
- ^{xv} Policy Hub. Better design for greater circularity. February 2020
- ^{xvi} Higg MSI. Material Sustainability Index. Retrieved from: <https://msi.higg.org/page/msi-home>
- ^{xvii} This does not entail full endorsement of the document's contents.