

Sustainable Product Policy – Setting Design Requirements for Apparel and Footwear

Position Paper (Summary)

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The Policy Hub – Circularity for Apparel and Footwear supports the EU’s plans to make sustainable products a norm as part of the Sustainable Product Initiative (SPI). We expect that the SPI will ensure harmonisation across the EU and create a needed level playing field when it comes to design requirements of textiles to make them fit for the circular economy. To fully leverage SPI’s potential and achieve its intended goal of making products sustainable, the Policy Hub recommends the following focus areas:

1. A NEED FOR A HARMONISED AND ALIGNED SYSTEM WITH CLEAR OBJECTIVES

For a successful implementation of the SPI, we recommend the following:

- **Expand the Ecodesign Directive to textile and footwear products in coordination with industry stakeholders**

The Policy Hub supports the expansion of the Ecodesign Directive to include textile and footwear products.¹ We further ask for the European Commission to **consider the nature and specificities of textiles and develop tailored measures for our sector at the product and material level.**

- **Use the stakeholder consultation forum to develop product-specific measures**

The Policy Hub recommends using a stakeholder consultation forum to consult the relevant textile stakeholders including civil society when developing product-specific measures for textiles. We propose to create working groups which should further define appropriate design and data measures for textiles per product category.²

2. MEASURES NEEDED TO ACCELERATE SUSTAINABLE DESIGN OF TEXTILES

To create a comprehensive and effective policy instrument for measures needed to accelerate the sustainable design of textiles, the Policy Hub recommends the European Commission to consider the following:

1. **Set minimum mandatory design requirements per PEF product category**

- **The Policy Hub recommends introducing ecodesign requirements on physical durability and recyclability, and to further define targets for recycled content and carbon reduction.** It will be important that any requirements and targets set under **the SPI are realistic, reasonable, and measurable.** The SPI should also clarify how they will be verified with an appropriate enforcement mechanism to be set in place to ensure accountability.

¹ Hereinafter “textiles” are used to include both garment and footwear products.

² As part of the currently developed PEF CRs for apparel and footwear, 13 product categories were identified: (1) T-Shirts, (2) shirts and blouses, (3) sweaters and midlayers, (4) jackets and coats, (5) pants and shorts, (6) dresses, skirts and jumpsuits, (7) Leggings, stockings, tights and socks, (8) underwear, (9) swimwear, (10) apparel accessories, (11) open-toed shoes, (12) closed-toed shoes, (13) boots. We recommend using this classification when setting product-specific measures.

- **Set design requirements for textiles per product category using a comprehensive and scientific assessment**
 - **A comprehensive and scientific assessment should be used** to determine the potential environmental impact improvement of the textile value chain when setting design requirements and targets. **The Policy Hub recommends the European Commission to leverage the existing EU Product Environmental Footprint (PEF) methodology and use it as much as possible when assessing the environmental impacts of textile products and the feasibility of their improvement.**
- **Set (physical) durability requirements**
 - Textiles must be designed with longevity in mind and made to be used for long. To ensure this, **minimum thresholds for physical durability**, e.g., X number of washes at product category and fibre type should be set.
 - Any durability requirements such as the example above should be based on and **aligned with the durability requirements agreed as part of the EU PEF methodology**. This would ensure legislative consistency and reduce the administrative burden both for the EU and the business.
- **Set recyclability requirements**
 - **Consider the currently available recycling technology** when setting the recyclability requirements and timelines as part of the SPI.
 - **Provide economic and financial incentives** for the development of recycling solutions for textiles.
 - Develop recycling solutions for textiles and viable material alternatives (with the same or improved functionality) and **progressively limit the use of material mix, dyes, trims, sewing threads, prints, permanent fusion of different materials, and finishes not compatible with recycling, whenever meaningful based on environmental impact analysis.**
 - **Consider different trade-offs and the function of a product** when setting the recyclability requirements as explained above. The requirements should be defined together with recyclers.
 - **Any recyclability requirements should be aligned where possible with the recyclability requirements agreed under the EU PEF methodology** to provide consistency and reduce administrative burden.

II. Set relevant targets for textile products

We recommend setting targets for product design concerning recycled content and carbon emissions. They should be **based on a scientific methodology and a comprehensive assessment of the potential environmental impact improvement of the textile value chain**. An appropriate verification method will be needed to ensure compliance.

- **Set recycled content targets**
 - We recommend **setting minimum recycled content targets in the overall product portfolio of a company by fibre type**, e.g., X% recycled polyester per company's portfolio by 2025. We should prioritise the fibres based on the potential impact and availability of recycling technologies.
 - **The recycled content targets should be based on the condition that there is a sufficient amount of secondary raw materials, and the right infrastructure exists to access them** (see section iii).

- **A strong EU policy, including but not limited to incentives, should be developed to stimulate fibre to fibre recycling.** For example, the European Commission should organise round tables with fibre producers, material recovery facilities, and other stakeholders to gather insights as to how to accelerate fibre to fibre recycling.
- **Set carbon thresholds**
 - We recommend **introducing CO2 thresholds at a company/ producer level in line with the obligations set in the Paris Agreement.**
 - Also, **companies should progressively disclose the carbon footprint of their products.**

III. Stimulate market for secondary raw materials and build the right infrastructure

In addition to setting the eco-design requirements for textiles, the European Commission should also stimulate the creation of a market for secondary raw materials. **The Policy Hub encourages the European Commission to create the right market conditions for secondary raw materials which must be scaled to become competitive to virgin materials.**

Financial measures will be important to shape the right economic conditions for the secondary raw material market. **We recommend using short-term EU subsidies for scaling in collecting and sorting and introducing other price incentives, such as VAT reductions to companies using secondary raw materials or other tax or tariff relief on sustainable materials.** Also, through the EU-wide and harmonised EPR scheme, the European Commission should **introduce the eco-modulation of fees.**³

Moreover, **the relevant infrastructure must be built to ensure a constant flow of high-quality secondary raw materials.**⁴ Investments in material collection, sorting, disassembly infrastructure, and innovative recycling technologies are a prerequisite and a critical success factor for building a market for large-scale secondary raw materials in the apparel and footwear industry. The EU should contribute to them through research programs, such as Horizon 2020 and Life. In addition, dedicated funding should be allocated for the scaling of pilot/near commercial-scale technologies.

3. INCENTIVISING CIRCULAR BUSINESS MODELS

Transitioning to the circular economy will require changing the current business practices into more sustainable models, such as resell, recommerce, product as a service system, and others. The EU should create **the right market conditions for the circular business models to flourish using incentives and not through the enactment of binding requirements. The latter would only stall innovation and could lead to market barriers.** To incentivise the use of circular business models it will be important to use financial incentives, e.g., lower VAT for circular business models and sustainable textile products (as defined per EU Taxonomy), create consumer awareness and address other challenges, such as administrative barriers regarding liability and insurance for users. For precise recommendations on the circular business models, see pages 7-8 of our full [SPI position paper](#).

³ To see a list of recommendations as to what such an EPR scheme should look like, see our recommendations in the [joint position paper](#) with other relevant stakeholders.

⁴ For more recommendations on how to build the right infrastructure for textile waste management in Europe and on how to secure a constant flow of high-quality secondary raw materials see our [position paper](#) on “Waste as a Resource”.