

FEAD's reply to the EU strategy for sustainable textiles

FEAD, the European Waste Management Association, representing the private waste and resource management industry across Europe **welcomes** the European Commission's initiative on sustainable textiles under the European Green Deal, the new Circular Economy Action Plan (CEAP) and the Industrial Strategy. Private waste management companies are major operators in this service, operating in 60% of municipal waste markets in Europe, and in 75% of industrial and commercial waste.

In the last 15 years, production and per capita sales of clothing have approximately doubled while clothes utilization has declined. This is mainly due to 'fast fashion', with quicker turnaround of new styles, increased number of collections offered per year and, often, lower prices. The average number of times a garment is worn before it ceases to be used has decreased by 36%.

As of its current state, the textile sector, despite its efforts, entails significant environmental costs, without internalising the external costs created to the environment and to society. Thus, margins for improvement exist, especially for what concerns the end of life of clothes; across the industry, only 13% of the total material input is, in some way, recycled after clothing use. Most of this recycling consists of cascading to other industries and use in lower-value applications. This includes, for example, insulation material, wiping cloths, and mattress stuffing – all of which are currently difficult to recapture and therefore likely constitute the final use.¹

From a waste management perspective, in order to improve the circular economy which requires more and more ambitious targets in terms of quantity and quality, we would like to stress the following needs:

- **Ecodesign measures**

There is a large margin for improvement in clothes' design, in light of circular economy's principles. There is a need to transform the way clothes are designed, sold and used to break free from their increasingly disposable nature.

While designing clothes and textiles, their end of life should be kept in mind: garments have to be durable, reusable and recyclable.

Moreover, there are acknowledged hazardous substances in textiles that must be phased out, in order to increase their recyclability. When setting recycling targets and ecodesign measures, this must be taken into account.

In order to improve recyclability of garments, the following general rules should be kept in mind:

- phase out substances of very high concern and microplastics;
- reduce the use of composite fibers to an absolute minimum;
- use recyclable polymers or natural fibers as much as possible;
- the parts made from different materials should be removable.

¹ A-New-Textiles-Economy_Full-Report: Ellen Mc Arthur Foundation

- **Boost the European textiles' industry**

We recognize a huge need to boost the textile industry within the EU in order to increase environmental and economic sustainability and self-sufficiency.

There is also the need to build up a stable and competitive market for recycled materials in Europe. This can be best achieved by an EU-wide introduction of mandatory recycled content rules in products, as well as sustainable ecodesign measures for textiles for a better return flow of materials.

Having a strong textiles value chain is of strategic value and importance for Europe as well as for our industry.

- **Mandatory recycled content rules**

Mandatory recycled content in products is essential for the creation of a stable and competitive market for recycled raw materials in Europe. The mandatory integration of recycled content in textiles/clothes will boost the recycling market in Europe, foster investments in innovative recycling technologies and decrease the environmental footprint of textiles.

In order to guarantee a level-playing field, minimal recycled content should also be mandatory for imported textiles.

- **EPR schemes**

FEAD welcomes EPR scheme on textiles keeping in mind the following rules:

- the fees applied to products should be modulated according to environmental criteria such as recyclability, recycled content, durability and reusability with a common agreement on these definitions;
- if Member States are to implement separate collection systems with ambitious recycling targets, there is a need for good data to calculate recycling quotas (currently lacking);
- there is a need to subsidise beacon projects for textiles recycling.

In the context of setting up EPR schemes, due consideration should be taken of existing performant business to business contracts between producers and the waste management sector.

- **Green Public Procurement**

Green Public Procurement in textiles (such as uniforms, workwear, towels, linen, etc.) can be improved in selection criteria of public procurement processes. When assessing ability to perform a contract, contracting authorities should take into account specific properties related to environmental aspects. This includes, for example, recyclability or recycled content of procured textiles.

A best practice to be pointed out is the procurement of towels and washcloths containing at least 10% recycled post-consumer textile fibres introduced by the Ministry of Defense of the Kingdom of the Netherlands in 2016. Each bid was assigned a score out of a possible 100 points (maximum) based also on the maximum percentage of recycled content and certification of this. In the end, the 100,000 towels purchased by the MODNL contained 36% recycled post-consumer textiles fibres, and the overalls contained 14% recycled post-consumer textiles fibres.

- **Enforcing the control of illegal movements of textile waste**

The EU should set up an effective control mechanism for the exports of used textiles, in order to avoid illegal shipments and to ensure proper environmentally sound recycling/recovery processes outside EU.

- **Set EU reuse and recycling targets**

Set EU harmonised minimum re-use and recycling targets.

- **Harmonised end-of-waste criteria**

Harmonised end-of-waste criteria at EU level are needed both after recycling and preparation for reuse in order to support the development and marketing of secondary raw materials or products. Reaching the end-of-waste status leads to a higher market acceptance at EU and global level of the treated material compared to when it is still labelled as waste.

Without diverging from the current trend, the negative impacts of the textiles' industry will be potentially catastrophic. Thus, FEAD totally support the European Commission and the textiles' industry's efforts to improve its environmental and social sustainability.

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