

Public Consultation on the EU Strategy for Sustainable Textiles

Fields marked with * are mandatory.

Introduction

The [European Green Deal](#), the [Circular Economy Action Plan](#) (CEAP) and the [Industrial Strategy](#) identified textiles as a priority sector in which the EU can pave the way towards a carbon neutral and circular economy, and announced an EU Strategy on textiles. The strategy will be developed taking into account:

- The recovery needs identified in the context of the [Recovery Plan](#), in the light of current and expected weaknesses on both the demand and supply sides following the impact of the pandemic
- The preparation of the [Sustainable Products Initiative](#)

The questionnaire is divided into:

- General information about the respondent
- Main consultation questions:
 - Support to the recovery, resilience, sustainability and competitiveness of the sector
 - Opportunities and challenges for increased circularity along the value chain
 - International dimension of the strategy, due diligence and transparency

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French

- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

FEAD

* Surname

Secretariat

* Email (this won't be published)

info@fead.be

* Organisation name

255 character(s) maximum

FEAD

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

* Please specify your sector:

- Agriculture, forestry and fishing
- Textile, apparel, footwear
- Chemicals and chemical products
- Construction
- Electrical equipment
- Computers, electronic and optical products
- Food and beverages
- Materials (e.g. metals, plastics, paper)
- Retail & wholesale trade
- Banking, insurance, reinsurance and pension funding
- Accommodation and food service activities
- Other

If "Other", please specify:

200 character(s) maximum

European Federation of Waste Management Industries

Please specify the type of product your organisation produces or represents:

- Intermediate product (e.g. ingredient or component for a final product)
- Final product (used as it is)
- Both intermediate and final products

- Other (e.g. services)

* Please specify your main activity (or as an umbrella organization, the activities of your members):

- Manufacturer of textiles, clothing or footwear
- Brand/retailer of new textiles, clothing, or footwear
- Provider of textile services (leasing, repair, digital platform owner, etc.)
- Collection of used textiles and footwear for reuse (non-waste)
- Waste collection (public or private)
- Processing/wholesale of collected used textiles and/or textile waste
- Second-hand retail
- Recycling and/or remake/redesign
- Technology researcher or developer on textiles, clothing or footwear
- Other

If "Other", please specify:

200 character(s) maximum

* Please indicate the level of market(s) you are active on:

- Local market
- Regional market
- EU market
- Non-EU market
- Worldwide market
- Not applicable

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Djibouti
- Libya
- Saint Martin

- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and
Nevis
- Saint Lucia
- United States
Minor Outlying
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and
Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Main Questions

1. TEXTILES, A KEY SECTOR OF THE EU ECONOMY AND KEY ENABLER FOR THE RECOVERY

1.1. How would you assess the relative importance of the following factors in promoting sustainability while ensuring resilience and competitiveness of the Textile Industry?

	Very important	Important	Not very important	Not important	I do not know/ no opinion
Mobilising funding and investments to support innovation (advanced materials technologies, green production technologies, advanced multifunctional products) and digitalisation (e-commerce, monitoring of value chains, business models)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Using sustainably sourced fibre types	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Designing textiles for circularity (e.g. durable, repairable, ease of disassembly, recyclable)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Using production processes where use of hazardous substances, waste generation and use of water are limited	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring textiles put on the EU market have proven low environmental footprint along the entire life-cycle	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing consumers with the necessary information about environmental and social impacts of textiles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing economic operators with the necessary information about environmental and social impacts of textiles along the whole value chain	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the uptake of circular business models among consumers (e.g. product-as-a-service, leasing, customised design)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creating the conditions to ensure sufficient flow of recycled materials (e.g. acting upon prices, facilitating shipment of waste or supporting industrial symbiosis)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring proper and sustainable functioning of global value chains (e.g. compliance with environmental, human and labour rights)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that additional factors not listed above should be considered, please specify:

200 character(s) maximum

Ensure a market for recycled materials through measures like Green Public Procurements or mandatory recycled content

Would the reply above differ, depending on whether it is clothing, home textiles or technical textiles?

If yes, please specify:

500 character(s) maximum

1.2. Which of the tools listed below should be given priority at EU level to recover from the crisis and promote resilience and sustainability of the textile industry?

(Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Provide technical and business assistance to promote green and digital technological innovation and product development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Propose regulation and policy frameworks (e.g. for emerging technologies and processes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Set binding requirements at EU level to foster product sustainability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Require Member States to implement mandatory Extended Producer Responsibility for textiles (and footwear)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Facilitate SMEs short-term access to finance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the development of skills applicable to sustainable textile production (e.g. design, product development)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Establish measurable mandatory criteria in public procurement through sectorial legislation and monitoring their implementation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Support and encourage the application of economic instruments (e.g. taxation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promote voluntary instruments on eco-labelling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Raise awareness among consumers to support the market for sustainable textiles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that additional options not listed above should be considered, please specify:

200 character(s) maximum

Establish measures for the market of recyclates such as mandatory recycled content

1.3. In your opinion which of the following technologies will contribute most to support a competitive and sustainable textile sector in the EU?

	1	2	3	4	5	I do not know/ no opinion
Advanced manufacturing (e.g. computer-aided manufacturing, automation, robotics)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Customisation, production on-demand and virtualisation (e.g. digital twins, bodyscanners, 3D-printers)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Automated sorting of textile waste by fibre type and colour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fibre-to-fibre recycling of single fibre type waste (e.g. 100% cotton, 100% polyester etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fibre-to-fibre recycling of fibre blends (e.g. polycotton etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Open loop recycling of textiles into high-value non-textile products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Digital passport/tagging (e.g. reading of bill of materials, chemical content of products)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Production of innovative technical and smart textiles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that additional technologies not listed above should be considered, please specify:

200 character(s) maximum

2. CIRCULAR ECONOMY IN THE EU TEXTILE SECTOR

2.1. Overview – full value chain

2.1.1. Which elements of circularity in the value chain do you consider should be tackled as a priority?

(Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion

Designing textile products for durability, ease of repair, ease of disassembly and ease of recycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reducing the environmental impact of textiles production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promoting slow fashion (e.g. slowing down the rate of clothing consumption)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Supporting circular business models so that products are used longer and more often by one or more consumers until they are no longer fit for use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring repair services and consumers rights to repair	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring transparent, traceable, verified consumer and business information (e.g. on material and chemical content, environmental and social aspects)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring that no textile products are landfilled/incinerated without ever having been used (e.g. unsold clothes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Transforming used clothing/textiles and the fabrics they contain into new clothing (e.g. remaking)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Recovering fibres from textile waste and using these to produce new textiles products (e.g. fibre-to-fibre recycling)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Recovering fibres from textile waste and using these to produce other products (e.g. downcycling)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that additional options not listed above should be considered, please specify:

500 character(s) maximum

Ensuring the possibility of disassembling different parts of the cloth made with different fibers in order to boost recyclability
Phase out SVHC and micro-plastic from textiles' production.

2.2. Raw materials

2.2.1. Which element of raw material selection do you consider should be prioritised in order to promote sustainability?

(Please rate the choices below from 1 to 5 (with 1 denoting low preference and 5 denoting high preference))

	1	2	3	4	5	I do not know/ no opinion
Promoting the utilisation of sustainably sourced/produced fibre types in the EU and globally (e.g. through certification)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Making available information on the environmental profile of different fibre types and textile products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improving the price competitiveness of recycled fibres compared to virgin fibres (e.g. through economic instruments)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Acting on the inconsistent definitions/ classification of waste/ non-waste/ secondary resources/ end-of-waste between Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Increasing utilisation of secondary resources by ensuring quality/safety/durability of recycled content yarns and fabrics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improving knowledge / awareness of designers on the characteristics and functionality of recycled content yarns and fabrics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Acting on the lack of demand from end-consumers (households and public bodies) for recycled content in clothing and textiles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that additional elements not listed above should be considered, please specify:

200 character(s) maximum

Price for secondary raw materials may be higher than for primary where environmental, social or health costs are externalized. Strong measures such as mandatory recycled content and GPP are key.

2.3. Production processes

2.3.1. Which of the actions listed below should be given priority to promote more environmentally friendly production processes?

(Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Reducing fibre/fabric waste through more efficient production and confection processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reducing emissions to water, soil and air from production processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Avoiding/limiting the use of hazardous substances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Using renewable energy and promotion of energy efficiency in production facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Promoting water reuse by production facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Enhancing interactions between stakeholders in the production chain to increase sustainability of production processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that further actions not listed above should be considered, please specify:

200 character(s) maximum

2.4. Design of products

2.4.1. *In order to facilitate the transition to a more circular economy, how would you assess the relative importance of the following product features?*

(Select from following options for each feature: very important, important, not very important, not important, no opinion)

	Very important	Important	Not Very important	Not important	I do not know/ no opinion
Technical durability and information on the expected lifetime	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Less sensitive to trends, focused more on timeless design	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Availability of information on product repair	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Product design facilitating maintenance and repair activities and availability of spare parts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the environmental impacts of the product over its whole life-cycle from raw materials to re-use and disposal.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reusability: upgradability, modularity, size and shape flexibility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower resource demand for care and maintenance (e.g. require less frequent laundering, lower temperature, easy/no iron etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Recyclability: ease of disassembly, reduced fibre blends, avoidance of chemicals that hamper recycling, information on material and chemical content	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Avoiding the presence of hazardous substances	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of recycled fabrics or fibres	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of natural and sustainably grown fibres	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other features not listed above should be considered, please specify:

200 character(s) maximum

When designing a product, clearly and transparently identify its end-of-life/recyclability

2.4.2. How can the environmental impact from microplastics shed from clothing /textiles best be tackled without causing environmental problems in other areas?

(Please rate the choices below from 1 to 5 with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Reducing the use of synthetic fibres in textile products in favour of natural fibres	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Supporting and developing manufacturing processes able to reduce fibre-shedding from products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capturing microplastics in washing machines/ washer-dryers/ tumble-dryers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing eco-design measures, such as essential requirements per fibre type (e.g. filament, staple fibre) that ensure low shedding rates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labelling products according to their level of microplastics release	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting technologies to separate microplastics from sludge in waste water treatment plants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Research on better understanding of the causes of microplastics emissions and identification and development of technical solutions to tackle the issue.



If you think that other actions not listed above should be considered, please specify:

200 character(s) maximum

Avoid the use of microplastics in textiles

Do you have any other comments about product design?

500 character(s) maximum

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.

2.5. Consumption Behaviour

2.5.1. How would you assess the relative importance of the following measures to promote sustainable consumption behaviour at EU level?

(Select from following options for each measure: very important, important, not very important, not important, no opinion)

	Very important	Important	Not very important	Not important	I do not know/ no opinion
Provide information for consumers (e.g. on expected lifetime of clothing/ textile products, reparability, care of use, respect of human rights and environmental footprint)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further promote the EU Ecolabel for textile products and footwear to consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide stronger protection of buyers against false and misleading information in environmental claims (greenwashing)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Organise EU-wide awareness campaigns, education and training to	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

promote sustainable textiles use and address overconsumption (e.g. fast fashion)					
Provide/support platforms/websites promoting repair of clothing/textiles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Raise awareness of and incentivise new business models (e.g. for sharing, rental of textiles)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve (and increase consumer awareness of) rules on legal and commercial guarantees and shift the burden of proof from consumers towards producers/retailers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage economic incentives to buy sustainable/circular textiles (e.g. through differentiated taxation levels depending on products' resource efficiency)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that further measures not listed above should be considered, please specify:

200 character(s) maximum

2.5.2. Which of the following business models contributing to a circular economy do you believe have most potential for economic viability and upscaling?

(Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Selling quality durable products with high personal value (e.g. partially designed by or tailored for the consumer)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Take-back and resell of own brand products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Second-hand retail (of others' products)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Leasing/rental services for consumer (e.g. baby clothing subscriptions)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumer to Consumer exchanges of products (e.g. wardrobe sharing for accessing/sharing clothing)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Business to Business leasing/rental services, such as textiles for hospitals, kitchens, hotels.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Repair and fitting services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Redesign of used textiles/textile waste into new products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that other options not listed above should be considered, please specify:

200 character(s) maximum

Do you have any other comments about the consumption phase?

500 character(s) maximum

2.6. Post-consumer textiles reuse and recycling

2.6.1. How would you assess the relative importance of the following challenges to a greater reuse of used textiles? (note that challenges to recycling are considered later)

(Select from following options for each challenge: very important, important, not very important, not important, no opinion)

	Very important	Important	Not very important	Not important	I do not know/ no opinion
Lack of separate collection systems for post-consumer textiles and textile waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Saturation of global markets for second-hand textiles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of European businesses' demand for second-hand clothing and textiles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of knowledge among collectors and sorters of global markets for second-hand textiles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of options for consumers to access second-hand clothing and textiles (e.g. new business models)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lowering quality of new textiles placed on the market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Falling global prices for second-hand clothing reducing the economic viability of used textile collection



If you think that further challenges not listed above are of high importance, please specify:

200 character(s) maximum

The main challenge for textile reuse is the very scarce quality of textiles which makes the majority of them not reusable

2.6.2. How would you assess the relative importance of the following challenges to *recycling* of post-consumer waste textiles into new textiles in the EU?

(Select from following options for each challenge: very important, important, not very important, not important, no opinion)

	Very important	Important	Not very important	Not important
Lack of markets and capacities for textile waste recycling including textile-to-textile recycling	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of targets for reuse and recycling to be implemented at national level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of traceability of chemical content in textile waste	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of automated sorting capacity of textile waste by fibre type and colour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of data on the overall fibre composition and fibre blends of textile waste collected in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of investments in sorting and recycling technologies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Textile products not designed for ease of disassembly or ease of recycling (e.g. use of complex fibre blends)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of new techniques that make it possible to separate material and fibre blends while keeping the value	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of economically viable and sustainable chemical recycling technologies especially for fibre blends	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of demand for recycled content yarns and fabrics from brands/producers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Insufficient cooperation/exchange of information along the value chain (e.g. between brands, textile manufacturers, recyclers and waste collectors)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
High labour costs in Europe for redesign / upcycling/ textile production	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
High costs of logistics for waste transportation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Regulatory/administrative obstacles to the transport of textiles waste across borders	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that other obstacles not listed above are important, please specify:

500 character(s) maximum

Do you have any other comments about enabling factors to promote increased collection, reuse and recycling of post-consumer textiles?

500 character(s) maximum

- 1) Mandatory recycled content in products is essential for the creation of a stable and competitive market for recycled raw materials in Europe
- 2) Green Public Procurement in textiles (such as uniforms, workwear, towels, linen, etc.) can be improved in selection criteria of public procurement processes
- 3) 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 product

3. GLOBAL COMPLIANCE, DUE DILIGENCE AND TRANSPARENCY

3.1. Which of the following aspects are in your opinion more effective to promote sustainability (including fair wage, decent working conditions and labour and human rights) across the value chain?

(Select from following options for each: very important, important, not very important, not important, no opinion)

	Very important	Important	Not very important	Not important	I do not know/ no opinion
Better integration of social sustainability into EU Green Public Procurement criteria for textiles and setting targets for green public procurement of textiles in Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better integration of social sustainability into the EU Ecolabel textiles products					

and footwear and increased promotion of the EU Ecolabel amongst consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of harmonized certifications of sustainably produced textiles including compliance with UN's guiding Principles for Business and Human Rights	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public private partnerships that engage in improving sustainability, including labour- and human rights across the value chain	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging European brands /producers to engage in Voluntary Agreements on taking greater responsibility for upstream working conditions, labour rights, job security etc	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring better enforcement of the Trade and Sustainable Development (TSD) chapters of free trade agreements with third countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing specific guidance on textiles to supplement the EU horizontal due diligence rules in the upcoming sustainable corporate governance initiative covering environmental protection, human and labour rights	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislation ensuring that textiles placed on European markets have been produced under minimum standards for human rights and labour rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring businesses compliance with OECD Due Diligence Guidance applicable to textiles	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU external action and development funding directed to projects on social inclusions, environmental awareness, etc	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exchange and promotion of best practice between brands, producers and recyclers across global value chains.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring consistency on definitions of waste/non-waste with respect to used textile collection	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other actions not listed above should be considered, please specify:

500 character(s) maximum

3.2. Which of the following instruments should be given priority to ensure that imported textiles materials and products comply with EU’s legislative requirements?

(Please rate the choices below from 1 to 5 with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Guidance in EU’s legislative requirements placed upon imported goods, including free trade agreements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Customs controls - market surveillance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Economic incentives for compliance with sustainability standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of tracing technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Cooperation with online marketplaces	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other instruments not listed above should be considered, please specify:

500 character(s) maximum

Ensure traceability and certainty in liability for all textiles put on the market with all tools such as product passport

3.3. Which of the actions listed below should be given priority to ensure that separately collected post-consumer textiles in the EU are processed and treated with due diligence to the waste hierarchy, environmental protection, human and labour rights and decent working conditions abroad?

(Please rate the choices below from 1 to 5 with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion

Requirement for Member States to report on the processing and eventual destination of separately collected post-consumer textiles and textile waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Establishment of a third party verified code of conduct for actors collecting and processing post-consumer textiles including verification of appropriate treatment of textiles exported to third countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Specify obligations for exporters to ensure and verify that textile waste exported to third countries are managed in an environmentally sound manner.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Developing specific guidance on textiles for collectors and processors of post-consumer textiles including environmental compliance and social conditions downstream as supplementary to the EU horizontal due diligence rules in the upcoming sustainable corporate governance initiative	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Establishing a voluntary agreement with the post-consumer textiles industry on environmentally and socially responsible collection and processing of post-consumer textiles including downstream elements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic incentives for compliance by collectors and processors with sustainability standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Education and training in due diligence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development of EU level criteria to differentiate between used or second hand clothes and textile waste.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that other actions not listed above should be considered, please specify:

500 character(s) maximum

Optional Additional Comments

If you wish to add further information, comments or suggestions (relevant to the scope of this Public Consultation), please do so here:

2000 character(s) maximum

Margins for improvement exist in the sector especially in the end of life of clothing: 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.

The first issues to be tackled are:

- 1) Ecodesign measures and a stable and reliable market for secondary raw materials
- 2) Boost the textile industry within the EU in order to increase environmental and economic sustainability and self-sufficiency
- 3) Set up an effective control mechanism for the exports of used textiles, to avoid illegal shipments and to

- ensure proper environmentally sound recycling/recovery processes outside EU
- 4) Harmonised end-of-waste criteria at EU level are needed to support the development and marketing of secondary raw materials or products
 - 5) 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
 - 6) EPR scheme on textiles must be established, 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;
 - there is a need to subsidise beacon projects for textiles recycling (R&D is key in the sector)
 - 7) An eco-label for sustainable and recycled textiles should be a priority, bearing information on the carbon footprint of the product.
 - 8) Financial instruments should be employed to address the price gap between textile products containing recycled materials and those based on virgin materials
 - 9) For textiles imported to the EU, a Carbon Border Adjustment Mechanism should be applied and consider both the energy content and the material content

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Contact

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