

Comments to the working document: *Preparatory study on textiles for product policy instruments – 1st milestone*

Fields marked with * are mandatory.

Welcome to the form that will allow you to contribute to the development of the [preparatory study on textile products](#).

On 23 February 2024, the Joint Research Centre (JRC) of the European Commission shared with all registered stakeholders the **working document** [Preparatory study on textiles for product policy instruments – 1st milestone](#).

On 18 and 19 March, registered stakeholders and JRC exchanged ideas during an online meeting about the working document.

From 20 March to 22 April, all registered stakeholders will be able to provide **comments in writing** to the working document.

The consultation process enables the JRC to improve the work under development and the exchange with registered stakeholders aims to:

- verify the work done to date,
- collect additional evidence on the investigated topics.

This web form allows all registered stakeholders to provide 10 written comments to the working document.

If you would like to provide more than 10 comments, **you can submit more than one web form**.

If you wanted to share a document, you can send it via email to JRC-B5-TEXTILES@ec.europa.eu

Confidentiality of personal data and information provided

Data and information provided via this form will be treated confidentially and complying with the General Data Protection Regulation ([Regulation 2016/679](#)). Therefore, data will be treated for the development of EU policies on textiles and it will be of the exclusive use of the European Commission.

The European Commission will process data and information complying with [Regulation 2018/1725](#). For more information, please, visit [this link](#).

Details of the stakeholder

	First Name	Last name	Organization	Email address
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My contribution can be published provided that I remain anonymous: I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.

1st comment

1. Please report the section number and the line number that your comment refers to.

	Section	Line
. *	3.2.2	536-538

1. Please report your comment

Text of 1 to 5000 characters will be accepted

E-textiles are excluded from the scope of the PS. We would like to clarify if apparel containing Li-Ion batteries (e.g. to produce sound or light) are considered e-textiles or apparel. These pieces will be collected together with other type of apparel and waste management companies are currently facing strongly increased fire incidents caused by lithium batteries in waste collection, sorting or recycling plants where they are not expected. This in causing enormous economic damage to waste management plants due to the fires, but also issues with insurance companies no longer wanting to insure the plants. Batteries integrated in apparel should be banned as soon as possible through ecodesign criteria .

1. Do you want to add a comment?

- Yes
 No

2nd comment

2. Please report the section number and the line number that your comment refers to.

	Section	Line
. *	9.2.8	General comment

2. Please report your comment

Text of 1 to 5000 characters will be accepted

It was commented during the meeting, that the actual recycling capacities, the actual amount of recycled fibre available and the commercial viability of the products with recycled content must be considered in order to define recycled content targets. First of all, it must be said, that if products with recycled content are not commercially viable, recycling is not commercially viable and would thus not happen. Further than this, it must be noted, that recycled content targets allow to create a strong and stable demand for recyclates, which on its turn allows to invest and innovate, scaling up textile recycling technologies. In addition, it must be considered that the ongoing revision of the Waste Framework Directive, with the potential introduction of a mandatory EPR system across the EU, will provide further incentivise investments in waste management capacities. This means that recycled content targets are essential for the recycling industry and that future potential and not only current situation must be considered when setting targets. Targets should in any case be phased in time to accompany the progress.

2. Do you want to add a comment?

- Yes
 No

3rd comment

3. Please report the section number and the line number that your comment refers to.

	Section	Line
. *	9.2.8	General comment

3. Please report your comment

Text of 1 to 5000 characters will be accepted

Concerns have been expressed over the use of PET as recycled content in textiles, asking for it to be banned. Such a ban would be an unjustified market restriction. There are already mechanisms in place under the Packaging legislation to ensure recycled content, mainly for PET. In addition, Regulation (EU) 2022 /1616 on recycled plastic materials and articles intended to come into contact with foods also defined strict criteria for the collected plastic waste, among others, that it originated from separately collected waste. This means that with these measures, most of the PET waste packaging should be directed back to rPET packaging. However, there will still be some waste PET that could be used for textile production, meaning that it will still be recycled even if not possible for food contact material (e.g. because it does not meet the quality criteria as it was not separately collected, or it is littered PET taken out of oceans). Such recycling shall not be banned. The market supply of recycled PET currently vastly outstrips the demand for the recyclate which means there is no reason to restrict the use of recycled PET in textiles.

3. Do you want to add a comment?

- Yes
 No

Your opinion matters to us.

Thank you very much for taking the time to contribute to this consultation.

Contact

[Contact Form](#)