



European
Circular Economy
Stakeholder Platform

EUROPEAN CIRCULAR ECONOMY
STAKEHOLDER PLATFORM
(ECESP) COORDINATION GROUP



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REFLECTION
PAPER

LEADERSHIP GROUP ON TEXTILES

PREAMBLE

The work of the ECESP Textiles Leadership Group (TLG) has been ongoing since 2020, aiming to bring relevant actors together to discuss the main topics and actions to support the CE transition in the European textile sector.

In 2020, the TLG identified the most relevant social, environmental and economic challenges facing the textiles value chain, which require action in the following areas: Sustainable and fair production of raw materials; Overconsumption of textiles; Re-use and design for re-use; Recycling and design for recycling. Given their cross-cutting influence along the value chain, the TLG agreed to pay particular attention to Business models and Design.

In 2021, the ECESP Textiles Leadership Group identified three key topics: the EU Policy Framework, Extended Producer Responsibility (EPR) and Circular Design for textiles. In order to deep-dive into these topics together with policy makers, stakeholders from the entire value chain and other experts, the Group held three #EUCircularTalks online events. This document summarises the main takeaways from the events and a year of work^[1].

The work of the Leadership group aimed to inform relevant EU policy processes, including the consultations on the EU Textile Strategy leading to the Communication to be published in 2022 as well as the EU Sustainable Product Initiative. During 2021, the European Commission's JRC also published a key study: Circular Economy Perspectives in the EU Textile sector.

POLICY CONTEXT

The European Commission is considering EPR as a regulatory measure to promote sustainable textiles and treatment of textile waste in accordance with the EU waste hierarchy in the forthcoming EU Strategy for Sustainable Textiles. It remains to be seen whether EPR schemes will become mandatory for all Member States and whether criteria for EPR schemes for textiles will be harmonised at EU level.

What issues could EPR schemes for textiles help solve?

- EPR schemes for textiles can be an important driver promoting more sustainable products.
- Combined with eco-modulation of fees, EPR schemes for textiles could reward investments in circularity, ecodesign, recycling technologies and initiatives.
- EPR schemes for textiles could help account for externalities and hence provide an incentive to reduce related costs.

Experience and expectations: Setting EPR for textiles

- Harmonisation of EPR schemes and eco-modulated fees and a common approach within an EU-wide framework could help avoid market fragmentation and inefficiencies.
- National and regional schemes need to be coordinated with a view to better traceability, lifecycle assessment and reporting.
- The existing EPR schemes were referred to as a possible example to learn from for future EPR schemes for textiles. Considering the differences between the other product groups like Waste from Electrical and Electronic Equipment (WEEE) and plastics and the particular challenges stemming from them, it might be necessary to rethink EPR schemes for textiles altogether. The French EPR scheme for textiles remains the main source.

What is left to discuss?

- What would be more effective: adapting the fee to the degree of recyclability of a product, or to the volume that could not actually be recycled?
- How to leverage the common attitude among consumers that used textiles are not waste but resources? What approach, instruments and measures should be used to drive behavioural change in the way we produce and consume textiles and prevent them from becoming waste?
- How to drive demand for recycled content in order to scale up this market?

CIRCULAR DESIGN

80% of the environmental impact is defined in the design stage. With the forthcoming EU Textile Strategy, we need to convince stakeholders that action is needed on the ecodesign front. In this talk, we shared research results and practical examples of ecodesign to give decision makers tools to make circular change happen.

DESIGN CRITERIA FOR TEXTILES / EXISTING STUDIES AND STANDARDS PRACTICAL CIRCULAR DESIGN EXAMPLES

- **Ecodesign criteria for textiles - OVAM (to be published at the end of 2021)** - Resortecs is a dissolvable thread enabling clothes to be disassembled quickly without compromising on quality.
- **Durable, repairable and mainstream - How ecodesign can make our textiles circular - ECOS (2021)** - WEAR2™ Ecostitching Technology uses Wear2®Thread combined with microwave technology, an innovative, patented sewing thread that consists of recycled polyester in combination with an innovative core composition partly consisting of Copper Sulfide. These can be processed in a garment in exactly the same way as regular yarns. Microwave technology breaks the core of the yarn, guaranteeing complete disassembly at the end of its life.
- **Standardisation on circular textiles CEN TC248 WG 39** - A mono-cycle approach and design refers to products made entirely of materials suitable for the same cycle. This means that all trims and additional, such as buttons, thread, size and care label etc. need to match the main material of the piece and its recycling cycle. In this way, the product is designed to fit within either the biological or technical cycle and therefore to biodegrade or be recycled and regenerated into resources for the future. An example is HellyHansen.

- **Sustainable Product Policy – Setting Design Requirements for Apparel and Footwear - The Policy Hub - Circularity for Apparel & Footwear (2021)** - Design for longevity: Adjustable size - A common reason for a garment not being used as long as intended is that it simply does not fit anymore. Designing a garment to be size adjustable over time would overcome this challenge and prolong the use of it. Thus, size adjustability has the potential to result in less overstock of products and avoid the risk of overproduction. An example is Petit Pli.
- **EEA/ETC/WMGE Report on the role of ecodesign in the European circular economy with a focus on the textile sector and its needed enablers to transition (to be published Jan 2022)**- C&A Cradle to Cradle® Certified Jeans. The Jeans Redesign guidelines, developed by the Ellen MacArthur Foundation together with brands, manufacturers, mills, recyclers and academics, are based on the principles of a circular economy. To date, participants of The Jeans Redesign have put more than half a million pairs of circular jeans on the market, meeting minimum requirements for durability, traceability and recyclability, while using safe materials and processes.

What is left to discuss?

- As well as a minimum quality level of products entering the EU market, do we also want a premium quality level in the form of a standard (e.g. ISO)? Should the EU Ecolabel adopt this premium quality standard to become an aspirational label for textiles?
- Should we introduce a labelling system as with household appliances? How would it work and what would it indicate?
- How can we best address trade-offs between different design requirements (e.g., recyclability vs durability), with a focus on the lowest environmental impact of a product?

CLOSING REMARKS AND OUTLOOK

Taking action on ecodesign is a complex but essential matter to make a circular economy for textiles happen and reduce the impact on our environment. One possible avenue is to introduce minimum quality criteria for products entering the EU market to ensure better quality and prolong the lifetime of clothes. A second way to take action on ecodesign further down the product lifecycle is by encouraging and embracing technological innovations which make recycling more efficient. How to strike a balance between requirements for reusability and recyclability is one of the challenges here.

EPR schemes can also play a role in managing end-of-life textiles in line with the waste hierarchy. How much they can also help push for better products through eco-modulation and how such a fee should be designed still needs to be discussed.

This document is published in anticipation of the EU Textile Strategy Communication in 2022 and in the hope for a strong policy framework for the EU to boost sustainable business models, products and ways of consumption which will create a textile value chain that respects planetary boundaries.

ANNEX

Full list of priorities of the 2021 Textiles LG in order of priority, including EU Talks held

1. Circular design
EU Circular Talk: 9 November 2021
2. EPR
EU Circular Talk: 21 September 2021
3. Functional policy framework
EU Circular Talk: 6 July 2021
4. Projects, R&D, Innovation
5. Reduction of resource consumption
6. Mainstream / scale up circular
business models
7. Skills for sustainable textiles
8. Communication & public awareness
raising

List of LG members and observers in 2021

Members:

CSCP
RREUSE (Coordinator)
EEB
European Environment Agency
EESC
Ellen MacArthur Foundation
Circle Economy
EuRIC
Policy Hub - Circularity for Apparel &
Footwear
SMEUnited
Dutch Circular Textile Valley
Eurocommerce
Netherlands Enterprise Agency
INEC
Innozent
INNOWO
ENEA
OVAM
ECOS
Ecopreneur.eu
European Investment Bank
Generation Climate Europe

Observers

European Commission -
DG ENV, DG GROW