

22 February 2022

To:

Mr. Thierry Breton, Commissioner for Internal Market

Don't lose the thread: the need for an ambitious tangible vision to change the textile sector

Dear Commissioner,

More clothing is being produced, consumed, and thrown away than ever before, putting immense pressure on people and our planet. Textile supply chains are notorious for human rights and environmental abuses, whose breadth and scope are often also concealed by corruption¹. The COVID-19 crisis has shed further light on the power imbalances across textile and garment value chains and how their impact is mostly felt by the most vulnerable in the value chain, namely workers and farmers.

Ambitious changes in the textile industry are essential to stand any chance of stopping further environmental and climate breakdown, preventing widespread human rights abuses, as well as securing human health.

The upcoming EU strategy for sustainable textiles should not miss the opportunity to set an ambitious vision for a sustainable and circular EU textile sector which delivers on the EU's zero pollution objectives and the bloc's 2050 climate-neutrality target, while advancing the EU's objectives for the respect of human rights and decent work worldwide.

On 11 December 2019, European Commission President Ursula von der Leyen presented the European Green Deal as an ambitious direction for Europe towards sustainability. We, co-signatories of the civil society *Strategy for Sustainable Textiles, Garments, Leather and Footwear*², look forward to seeing this ambition translated into an impactful and comprehensive EU strategy for sustainable textiles. Many Members of the European Parliament expect the same³.

For the upcoming EU strategy to be coherent, ambitious, and impactful, it must:

- Set an EU-wide quantitative target for material and consumption footprint reduction with specific objectives for textile products for the sector, and an accompanying timeline, while ensuring a Just Transition to prevent any worker or region being left behind. Targets for the re-use and preparing for re-use of textiles should also be set with the aim to create quality jobs in Europe in these fields.

¹ www.transparency.org/en/news/cpi-2021-highlights-insights

² <https://fairtrade-advocacy.org/wp-content/uploads/2020/07/Civil-Society-European-Strategy-for-Sustainable-Textiles.pdf>

See also:

<https://wardrobechange.eu/policy-recommendations/>

https://cleanclothes.org/file-repository/fashioning_justice.pdf/view

³ Letters from MEPS: The Civil Society Shadow European Strategy for Sustainable Textile, Garments, Leather and Footwear, 3 June 2020: https://heidihautala.fi/wp-content/uploads/2020/07/Letter_ShadowStrategy_3rdJune2020.pdf; Raising the ambition of the EU's strategy on Textiles, 26 January 2022: https://drive.google.com/file/d/1-zycVfOG50RhGHqcl9Mn_lgaggW1zkzq/view

- Set out how the ban on the destruction of unsold/returned durable goods (introduced by the Circular Economy Action Plan) would be implemented in the textile sector. Unsold goods should include excess inventory, deadstock and returned items, with a particular focus on returns through e-commerce.
- Ensure Ecodesign measures go beyond recyclability and recycled content to focus on design for longer lifetimes. Take clear regulatory action to minimise and phase out the use of harmful substances in textiles throughout the value chain through requirements on chemicals of concern in final products as well as those used in the different steps of the production cycle. Ensure the EU's market surveillance regime is made more robust as systemic and effective product checks will be necessary to ensure compliance with new requirements.
- Investigate an Extended Producer Responsibility (EPR) scheme for textiles with strong progressive eco-modulation criteria going beyond recyclability, by including disclosure of chemical information and setting fee thresholds that depend on the number of new products placed on the market by a company each year. Any EPR schemes for textiles must include separate targets on collection, reuse, and recycling of textiles, and strictly respect the waste hierarchy in cooperation with social economy enterprises active in the collection and re-use of textiles.
- Go beyond putting the responsibility on consumers to make sustainable choices and instead make the existing linear model unattractive through economic incentives and fiscal measures.
- Ensure a level playing field for EU-produced products, exports, and imports. The EU should strengthen social and environmental sustainability concerns in the EU's trade regime, especially the GSP regime. The EU should ensure that trade agreements and preference programmes are used as levers to promote sustainable development, human rights, and fair and ethical trade around the world, and to improve the responsibility of value chains.
- Address the economic, environmental and social impact of e-commerce across the value chain by setting out a plan to regulate this area through legislative means.
- Address the impact of unfair purchasing practices (UTPs) imposed by buyers upon manufacturers in the sector, including their environmental and social consequences. The Strategy must commit to undertaking legislative action to ban the most damaging UTPs from the textile sector.
- Show the way for the future sustainable corporate governance legislation and its human rights and environmental due diligence (HREDD) requirements to adequately tackle the challenges that are specific to the global apparel and textile sector, such as freedom of association, health and safety, living wages. This will require ensuring that all SMEs active in the sector are covered by the legislation, that the impact of chemical use on the environment and people in production countries as well as the impact of purchasing practices are covered by the due diligence obligations of buyers.⁴
- Require companies to provide detailed information about upstream or downstream environmental impacts (such as chemical and material-efficiency aspects) and human rights and social aspects as well

⁴ The EU has already taken an initiative to curb similar practices in the agri-food sector. See also: https://news.industrial-europe.eu/content/documents/upload/2021/9/637684400585561764_210106%20Draft%20Leveraging%20UTP%20transposition_20210927.pdf

as responsible business conduct including prevention of corruption. Such traceability and transparency requirements must include as a minimum information on all factories in the manufacturing and post-consumer phase and be accessible to all stakeholders. Furthermore, it shall also require that companies start mapping their full value chains, including home-based workers and informal workers, and require disclosure where such disclosure can be done without potential harm for workers. Require companies to provide detailed information on how they are recognising the essential role of freedom of association and collective bargaining. Require companies to prevent and mitigate the gap between actual and living wages. These obligations can benefit from the framework of the digital product passport as a traceability and reporting mechanism and could be included in the future HREDD framework.

- Set a strategy to achieve public procurement tenders which include integrity, environmental and social responsibility as criteria. The role of social economy enterprises collecting and re-using textiles must be enhanced and associated with the legal collection and waste management obligations and targets of local authorities and Producer Responsibility Organisations.

Timely and effective action on these policy measures as well as strong alignment between them can establish the ambitious pathway for sustainability and decent work that the textile industry urgently needs. To this end, we call on you to ensure our recommendations are reflected in the EU strategy for sustainable textiles.

We look forward to receiving your response,

Sincerely,

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████████████████████ ECOS

████████████████████ European Environmental Bureau

████████████████████ Max Havelaar France

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