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SYNOPSIS REPORT ON THE CONSULTATION ON THE EU STRATEGY FOR SUSTAINABLE AND CIRCULAR TEXTILES

Contents

1 Introduction

This report presents the synopsis of all stakeholder consultation activities undertaken in preparation of the EU Strategy for Sustainable and Circular Textiles (hereafter referred to as 'the Strategy') that took place from May 2021 to early September 2021.

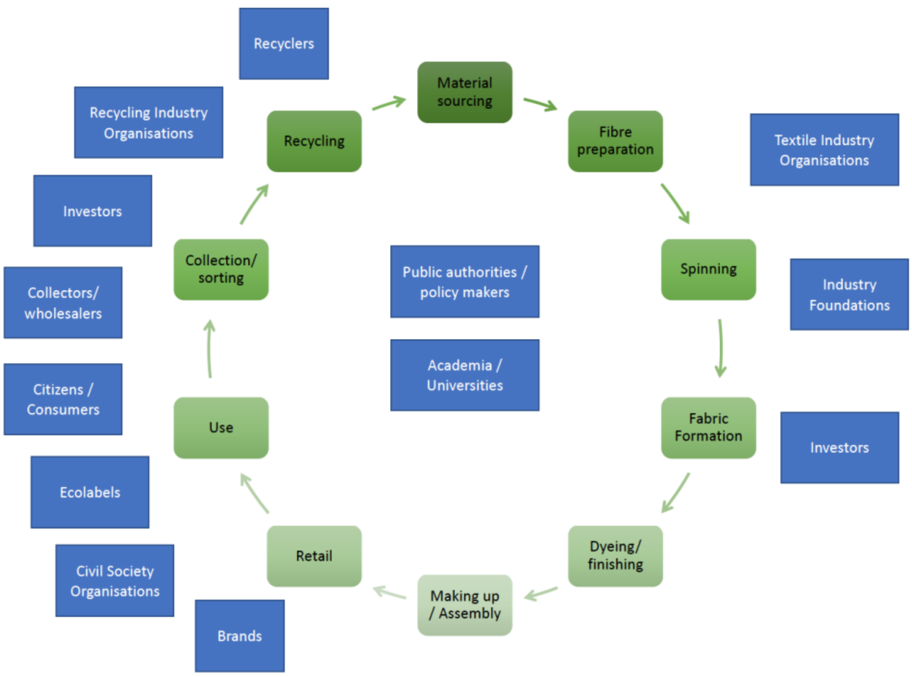
In line with the Better Regulation requirements, this report provides an outline of the consultation strategy, documents the consultation activities undertaken, presents the stakeholder groups that participated and describes the methodology and tools used to process the collected data. The results of each consultation activity are briefly presented. A summary of the initial results of this consultation has already been published, providing preliminary trends.

2 Consultation strategy

The objective of this consultation process is to ensure the involvement of a wide range of stakeholders in the development of the Strategy. In accordance with the Better Regulation Guidelines and their general principles, the consulting team developed a consultation strategy for the stakeholder consultation process ensuring an efficient and effective consultation approach.

2.1 Stakeholder mapping

The first step in the preparation of the consultation strategy was a thorough stakeholder mapping of the textile supply chain, including stakeholders related to the afterlife of textiles as well as public authorities, consumers and environmental NGOs. To ensure that the inputs from stakeholders are pertinent and add value, the Better Regulation method 'Six tests for Stakeholder Identification' was paired with the Prospex-CQI methodology[1] to identify and categorise relevant stakeholders.



1 Gramberger, M., K. Zellmer, K. Kok and M. Metzger (2014) Stakeholder Integrated Research (STIR): A new approach tested in climate change adaptation research. Climatic Change, 128(3), 201-214.

2.2 Methods for stakeholder engagement

The consultation comprised two activity streams:

- An Online Public Consultation (OPC) through an online survey, and
- A Targeted consultation via six online workshops.

2.2.1 Online Public Consultation (OPC)

The OPC took place between 12.05.2021 and 04.08.2021 and was disseminated via the European Circular Economy Stakeholder Platform[2] and through the social media accounts of the Directorate-General for Environment and the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs.

The OPC took place in the form of an online survey and enabled two forms of input:

- Input through a stakeholder survey that started with a general set of questions in a targeted questionnaire;
- Written input from stakeholders via position papers or other supporting documents.

The stakeholders targeted by the OPC were:

- Actors in the value chain: fibre, yarn, fabric or clothing/textiles manufacturers, suppliers, retailers, service and technology providers, post-consumer textile collectors, sorters, recyclers and waste management facilities;
- General public, citizens and consumers;
- Public authorities and policy makers: local, regional, national and international;
- Financial investors and incubators;
- Civil society and consumer associations: humanitarian/social and environmental;
- Research, innovation, education and training centres.

A total of 544 stakeholders responded to the consultation. Of these, 76 uploaded supporting documents via the questionnaire. A further 36 supporting documents were received by the European Commission via other channels.

Approximately 80% of respondents originate from within the EU. The non-EU respondents came from 3 EFTA countries and 18 additional countries around the world. Half of all responding stakeholders were either businesses or business associations (32.3% businesses and 17.6% business associations) and a fifth of responses coming from citizens (14.3% EU citizens, 4.8% non-EU citizens). The remaining responses were from: NGOs (11.8%); academic/research (7.4%); Public authorities (3.7%); Environmental organisations (1.8%); Trade unions (0.7%); consumer organisations (0.6%); Other (5.0%).

When classified according to their main activity within the value chain of textiles, those best represented were manufacturers of new textiles and clothing (23.3%), the technology R&D sector (10.3%) and brands & retailers (9.7%) followed by the value chain of post-consumer textiles: waste collectors (3.5%); recyclers (2.9%), collectors of used textiles (2.6%), processors/wholesalers of used textiles (0.6%) and second-hand retailers (0.6%). Providers of textile services comprised 1.7%

[2] https://circulareconomy.europa.eu/platform/

and the remainder classified themselves as Others (citizens, public authorities, certification organisations and NGOs but also businesses and business associations) (44.8%).

Data cleansing
One group of eight wool producers submitted identical responses, while a further group of 15 textile producers submitted identical comments under the free text submission fields, but differed somewhat in their responses to multiple choice questions. As these constituted a low percentage of the total submissions, they were not considered to fall under the definition of 'large campaigns'.

2.2.2 Online Workshops

Six targeted online workshops (half day) were held between 26.05.2021 and 15.07.2021 with the following themes and targeted stakeholders:

- Management of used textiles (*policy makers, local government, waste management companies, used textile collectors, wholesalers/sorters, textile manufacturers and retailers, circular economy businesses, recyclers*)
- Global dimension of textiles in a circular economy*:* (*social and environmental NGOs, policy makers, development aid organisations, intergovernmental organisations, trade organisations, textile brands, non-EU textile manufacturers, exporters of used textiles)*
- Sustainable consumption and circular business models (*consumer associations, retailers, textile brands with circular business models, textile leasing companies, social NGOs/companies, policy makers, researchers, circular economy businesses and platforms, online second-hand market companies/platforms, public procurement bodies, private bidders for public procurement*)
- Product design for circularity in the textile value chain (*policy makers, consumer associations, business organisations, producers and suppliers of textiles, fabrics, fibres, textile brands/companies (design departments), individual designers, circular economy businesses and platforms, reuse organisations, recyclers, researchers)*
- Traceability, the accuracy of information and market surveillance in the textile industry *(intergovernmental organisations, policy makers/market surveillance, national textile associations, textile manufacturers, brands/retailers, circular economy businesses (remake, reuse, recycling, sorting), academics/ consultants, consumer associations, voluntary tracing schemes, trade unions)*
- Increasing the capacity of research and development in the textile industry *(Intergovernmental organisations, policy makers/market surveillance, wholesalers/manufacturers, brands/retailers, circular economy businesses (remake, reuse, recycling, sorting), academics/ consultants /R&I specialists, R&D projects, fashion innovation spaces, trade unions/workers organisations).*
- Innovative and Digital Solutions *(National public authorities/national industrial associations, wholesalers/manufacturers, brands/retailers, circular economy businesses (remake, reuse, recycling, sorting), digital SMEs in the textile industry, academics/consultants, international organisations).*

The workshops were announced on the European Circular Economy Stakeholder Platform and a number of targeted invitations were sent to identified stakeholders within each target group. Each workshop was attended by between 50 and 70 participants. Each workshop featured presentations setting the policy context and presenting key topics for discussion. Stakeholder input was facilitated via online break-out discussion groups. The groups discussed goals for each topic, obstacles that could hamper the achievement of these goals and potential solutions to those obstacles, as perceived by stakeholders.

The consultation described above was preceded by a roadmap consultation[3] that ran from 05.01.2021 to 02.02.2021. This consultation received 229 responses from businesses (22.3%), NGOs (21.4%); Business Associations (20.5%), EU Citizens (11.4%), Academic/research (8.7%); Public authorities (5.7%); Environmental organisations (3.5%); Trade unions (0.9%); non-EU citizens (0.9%) and other (4.8%). 107 respondents to the roadmap consultation uploaded position papers or other documents to support their inputs.

2.2.3 Other contributions

In addition to the inputs received through the consultation activities described above, the Commission also received other relevant input in parallel to the formal consultation work (36 supporting documents).

2.3 Data processing

All data – both quantitative and qualitative – have been analysed, and quantitative data has been visualised in figures and tables and is presented in the factual summary report[4]. A comparison of the results of the questionnaire and the workshops has been made, including interdependencies, consistencies or contradictions in relation to contributions, and main stakeholder categories.

Quantitative inputs to the OPC were analysed, compared and contrasted by stakeholder types. Key differences in opinions between stakeholder groups have been identified and highlighted. Qualitative inputs provided via free text boxes in the questionnaire have been grouped according to main arguments, making note of the stakeholder type. Making use of the search function, relevant content within the 112 uploaded supporting documents was compared and contrasted under each thematic area.

Inputs received via the seven workshops and the roadmap consultation are used to supplement the OPC analysis under each thematic area.

The findings of this analysis and comparison is presented under section 3.

3 Results of the consultation process

The following section describes the main findings of the stakeholder consultation.

[3] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12822-EU-strategy-for-sustainable-textiles_en

[4] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12822-EU-strategy-for-sustainable-textiles/public-consultation_en (available in the factual summary report)

3.1 Support to a strategy on sustainable textiles

There was a wide positive response to the commitment of the European Commission to developing an EU Strategy for Sustainable and Circular Textiles as an overall framework to support the emergence of and circular, sustainable and resilient textile industry, and to provide consumers with more sustainable choices. Stakeholders called for the review and harmonisation of policy and regulatory frameworks to ensure more sustainable production and use of textiles. There was broad recognition amongst stakeholders of the need to ensure fair working conditions and environmental protection both in the global value chains of new products imported to the EU and the downstream value chains of exported used textile. Some of the policy instruments that stakeholders underlined as important in the development of the Strategy include the upcoming Sustainable Products Initiative, the EU Trade Policy, the EU Pact for Skills, the Chemical Strategy for Sustainability, the REACH regulation, the Consumer Agenda and the upcoming initiative on corporate sustainability due diligence.

Stakeholders are generally supportive of promoting circularity for textiles and express that the Strategy should aim to keep textile products in the economy for as long as possible through initiatives that promote higher product quality, durability, reuse and repair of products. There were also calls for reducing the material throughput of the industry, for waste prevention, for separate collection, reuse and recycling (e.g. under a harmonised EPR), for products that must meet sustainability and circular standards, and for reducing chemical use and greenhouse gas emissions.

The calls to increase circularity were made together with support to the social dimension of sustainability (e.g. reasonable working conditions and wages along European and global value chains).

3.2 Support to covering the complete value chain

Stakeholders showed support for a strategy covering the whole value chain.

Design for sustainability
There was broad agreement from stakeholders that design for circularity and sustainability should be prioritised in the Strategy. Stakeholders from the recycling and waste management industries focus on design for ease of recycling and for inclusion of recycled content. Other stakeholders argue, however, that durability should be prioritised before recyclability and that use of recycled materials and design for recyclability should only be implemented where this is assessed (using LCA methodologies) to lead to an overall reduction in impacts.

Stakeholders called for minimum eco-design requirements for all products placed on the European market, taking those which represent the highest product volumes first. They also stressed that criteria will need to be tailored to the functionality and type of product. It was argued that these requirements, and standardised methods to assess them, should be defined via a transparent, science-based process. This would also include harmonised definitions for recyclability, durability, reparability and reusability.

Materials and substances
Several NGOs and government stakeholders were cautious about prioritising or limiting any particular kind of fibre, arguing for choice of fibres that can be shown, via LCA methods or otherwise, to

be most sustainable under a particular function. A clear definition of sustainable materials is needed to optimise material choice under different circumstances.

Stakeholders are in relative agreement in prioritising the avoidance of hazardous substances and reducing emission to water, soil and air as the most important policy objectives for greener production processes. With respect to hazardous substances, stakeholders emphasise the need for innovation to find safe substitutions, the need to classify hazardous substances and the need for limiting hazardous substances used in textile production, as they inhibit recycling and build up toxins in the textile material loop.

Reducing the impact of micro-fibre shedding

Stakeholders called for reduced fibre shedding/release from textiles, through prevention measures such as mandatory requirements on product design to reduce shedding and controlled industrial pre-washing. Maximum benchmarks for all types of microfiber shedding could build on existing work i.e. the Cross-Industry Agreement[5]. Stakeholders also called for end-of-pipe measures such as mandatory requirements for microfibre filters in washing machines and dryers under the next round of Ecodesign Directive requirements for these appliances. Stakeholders argued that end-of-pipe solutions should only be a temporary mitigation action until micro-fibre shedding was prevented at source.

Across the board, stakeholders' most pressing priority was for more research on the issue to gain a better understanding of the causes of microfibers emissions and identification and development of technical solutions to tackle the issue.

Encouraging circular business models

There was general agreement on the need to stimulate and encourage circular business models concerned with reuse, redistribution, second-hand retail and repair, and product-as-service models, especially for products that experience rapid turnover such as baby and children's clothing. Businesses and businesses associations supported the uptake of models of quality durable products with high personal value, repair and fitting services, B2B leasing/rental, and redesign of used products.

Stakeholders argued that support to the uptake of circular business models is needed across the board, including large retail companies and brands. Some NGOs and reuse organisations called for caution to ensure that circular business models actually contribute to reduced environmental pressures and that they don't have a negative impact on social enterprises.

Information requirements, traceability and standards

There was broad stakeholder support for better transfer of standardized information between stakeholders in the value chain, and there was also broad agreement that much of this transfer of information could take place via a standardized Digital Product Passport (DPP).

Respondents stressed that different stakeholders (e.g. recyclers, consumers etc.) have different information demands. Accordingly, information requirements could cover aspects such as:

- working conditions under which products are manufactured, reused or recycled

[5] https://euratex.eu/cia/

- the environmental footprint of the product
- the bill of materials (BOM)
- reparability (defined through a standard)
- presence of hazardous chemicals including substances of concern used in production
- use of recycled content
- durability/expected lifetime
- microplastics release

Stakeholders call for common definitions and standard methodologies for calculating parameters such as expected lifetimes of products and their environmental and social footprint. The Product Environmental Footprint (PEF) methodology was identified as useful but needs to be widened to include social conditions in the value chain.

There was general agreement across stakeholder groups that the provision of reliable information to consumers is one key element in the transition to a circular and more sustainable textile economy, although stakeholders warned that this will not lead to more circular behaviour on its own. Stakeholders expressed a need to tackle false and misleading environmental, circular and social claims on products, and to ensure that underlying analysis is based on standard methodologies.

The EU Ecolabel was identified as a useful tool that already includes both standardised methodologies and a certification stamp for users, but the number of EU Ecolabelled textile products remains low. Mandatory labelling of products was suggested – but retailers and brands that took part in the consultation showed some concerns.

Stakeholders proposed a more formal recognition of other third party verified ecolabels and sustainability labels in line with the EU Public Procurement Directive. With respect to the organic label, it was proposed by some stakeholders that the EU Organic Regulation is updated to include all processing steps in the production of textile products and not just agricultural production.

Stakeholders call for policy ensuring that imports to the EU are produced under EU environmental and working condition standards. It was argued that the EU should use its market power to push global manufacturers and manufacturing countries to raise their standards. It was suggested by industry stakeholders that binding agreements can help to limit hazardous substances, but that initiatives should balance risk with functionality, especially with respect to technical textiles. Stakeholders also argued for stronger market enforcement including extra resources set aside and penalties for infringements, to ensure that products placed on the EU market, including via imports and e-commerce, meet minimum environmental and social standards.

Addressing overconsumption and the destruction of unsold goods

There was a general agreement amongst stakeholders that consumers have a key role to play in the transition to a more sustainable and circular economy for textiles by: extending the lifetime of textiles through proper care, repair and reuse; reducing the impacts of laundering through reduced wash temperatures and air drying; and passing on their used textiles for re-use and recycling. The EU, along with national and local governments, was seen to have a central role to play in encouraging these behaviours. Stakeholders argued that these changes can be brought about via campaigns, education of consumers and a greater availability of information. It was argued that the European Commission should put forward information requirements for textile products. It was also proposed that cities should be encouraged to provide citizens with information on available options for exchange of clothes and reuse, repair and recycling.

Several NGOs and government representatives argued that there is also a critical need to reduce the volume of textile products consumed in Europe. Stakeholders more broadly called for a reduction in the destruction of unsold dead stock through either a) an EU-wide ban on the destruction of unsold or returned goods, or b) by reducing the generation of returns via ensuring that transit costs are transferred to the consumer, or c) by the removal of tax and VAT obstacles to the donation of dead stock to second-hand organizations.

Sustainable textile waste management

Collection and sorting

Several government stakeholders and stakeholders from the post-consumer textile sector stressed the importance of developing and maintaining collection and sorting systems that retain the value of used textiles for as long as possible, and provide access to those organisations that can ensure that the textiles are treated as high as possible in the waste hierarchy. They also stressed the need for textile collection methods and emptying processes that guard against contamination by other waste and by rainwater.

The stakeholders identified a need to significantly scale up sorting activities in coming years to respond to the upcoming demand regarding separate collection of textiles waste which will enter into force on January 1st 2025. They also stressed the critical need for manual sorting by trained staff to ensure that all suitable items are separated for reuse and repair, prior to any automated sorting for recycling. Representatives from the same stakeholder groups argued for the development of uniform standards and guidance for optimal collection and sorting to retain the value of textiles as far as possible.

Social enterprises and others proposed that legislation within Member States delegating responsibility for the collection of textiles according to the 2025-requirement in the Waste Framework Directive, should take into account the role of social enterprises.

Reuse and recycling

There was general agreement that post-consumer textiles should be reused as far as possible, and where not possible, be prepared for reuse after entering waste streams. Stakeholders further agreed on the critical need to promote the recycling of textiles waste in Europe as the quantities of separately collected textile waste are expected to increase.

Exports of used textiles

All stakeholder groups including environmental organisations, public authorities and businesses agree that obligations ensuring that export of textiles are managed in a sound environmental manner, should be in place. Additionally, NGO's and local governments, reuse and industry associations, called for the need to 1) restrict the export of *unsorted* textiles to developing countries 2) promote reuse within Europe to reduce reliance on global reuse markets, and 3) ensure that exported, sorted textiles for reuse and recycling are monitored to ensure that they are reused and recycled.

Further proposals include reducing the consumption of new textiles in Europe to minimise the volume of used textiles for which solutions are needed.

Development of technology and innovation
There is a general recognition that there is an urgent need for innovation and development and scaling up of technology, to assist in maintaining and further expanding a competitive and sustainable textile sector in Europe. It was stressed that technology support must go beyond innovative recycling technologies and support durability, reuse and repair.

3.3 Regulatory instruments for implementation

Stakeholders showed support to a wide range of regulatory instruments for achieving the Strategy's objectives.

- Binding requirements on the supply of sustainable products were in particular supported by environmental organisations, NGOs and public authorities.
- Economic instruments for ensuring sustainable products were in particular supported by environmental organisations, NGOs and public authorities. Examples included reduced VAT for second-hand clothes and repair services; taxes on virgin raw materials to spur resource efficiency and circularity; incentives to extended product lifetimes.
- Awareness-raising amongst citizens and development of skills in sustainable textile production was in particular supported by businesses.
- Technical and business assistance to companies were supported by all stakeholder groups.
- Requirements on suppliers' provision of information on the environmental profiles of fibre types was broadly supported.
- Tackling due diligence issues in the textiles value chain through the upcoming Sustainable Corporate Governance Directive and the Corporate Sustainable Reporting Directive was in particular supported by industrial stakeholders. Mandatory due diligence was in particular supported by NGOs and intergovernmental agencies.
- Extended Producer Responsibility (EPR) as a tool for encouraging more sustainable products placed on the market and more sustainable treatment of post-consumer textiles was identified as important by the majority of the stakeholders that took part in the consultation. Stakeholders pointed out that EPR schemes can provide solutions to issues concerned with the collection and treatment of used textiles and textile waste, are in line with the polluter pays principle, can potentially incentivise the eco-design of textiles and innovative green industry solutions, and can be a driver for innovation.
- Public procurement is broadly considered as a potential driver for the development of more sustainable textiles and circular business models that can then be offered to a wider set of consumers. There was broad agreement among stakeholders on the need for target-setting and the development of mandatory sustainability criteria at EU level through sector-specific legislation.

4 Conclusion

This synopsis report, together with the factual summary report, present the methodology, data and key results of the consultation undertaken as part of the preparation of the EU Strategy for Sustainable and Circular Textiles with the objective of involving a wide range of stakeholders in the development of the Strategy. The consultation included:

1. An online Open Public Consultation (OPC) survey with 544 responses and 112 supporting documents businesses and business associations (47.9%), citizens (19.1%), NGO's (11.8), academia and research (7.4%), public authorities (3.7%), environmental organisation (1.8%), trade unions (0.7%), consumer organisations (0.6%) and other (5.0%).
2. Targeted consultation via seven online workshops with the following themes: a) Management of used textiles; b) Global dimension of textiles in a circular economy; c) Sustainable consumption and circular business models; d) Product design for circularity in the textile value chain; e) Traceability, the accuracy of information and market surveillance in the textile industry; and f) Increasing the capacity of research and development in the textile industry; g) Innovative and Digital Solutions
3. Consultation on the roadmap of the initiative with 229 responses.

The stakeholders consulted support the development of an EU Strategy for Sustainable and Circular Textiles as an overall mechanism to create a circular, sustainable and resilient industry. Stakeholders wish to see that the Strategy is harmonised with existing and coming policy initiatives impacting the production, use and end of life of textiles. The stakeholders further call for environmental sustainability to be balanced with social sustainability, ensuring working conditions and environmental responsibility and promotion of circular textiles along the value chain.