**EuRIC DRAFT Feedback about the prioritization of product groups included in the first working plan under the proposed Ecodesign for Products Regulation**

Textiles have on average the fourth highest negative life cycle impact on the environment and climate change, after food, housing and mobility[[1]](#footnote-1). Moving towards a circular textile production which includes textiles that can be used longer and are easier to be recycled can significantly decrease those impacts.

**a) Scope**

The purpose, use and design of textiles vary greatly between the various product categories which is why it is important to have a broad and detailed range of product categories included in the scope of potential delegated acts for textiles. Therefore, we support the inclusion of the previously identified textile product groups: (1) apparel, (2) home/interior textiles (e.g. bed linen, towels, tablecloths), and (3) footwear.

**b) Digital Product Passport**

The introduction of a Digital Product Passport (DPP) to provide clear, structured and accessible information on the environmental sustainability characteristics of products can be beneficial for the textile reuse and recycling industry if properly implemented. The DPP must be easily and freely accessible ideally by using a RFID or Near-field communication technology in conjunction with an open database. It is important to note that the level of information will greatly differ between the textile reuse and textile recycling industry. For example, important information for the reuse industry includes brand name, year of production and certificates and for the recycling industry it would be for instance the material composition and presence of chemicals. EuRIC welcomes the introduction of a DPP for textile products in order to enhance traceability and transparency in the textiles value chain.

**c) Circularity Requirements**

As laid down in the EU Strategy for Sustainable and Circular Textiles[[2]](#footnote-2), extending the life of textile products by using eco-design criteria is the most effective way of significantly reducing their impact on the climate and the environment. EuRIC therefore calls for

* Setting durability requirements for all textiles,
* Setting recyclability requirements for all textiles,
* Incorporating recycled fibre-to-fibre content into all new textiles.

**1. Durability requirements**

Extending the lifetime of a textile is of utmost importance to reduce its environmental impact. For EuRIC, durability means that a textile lasts longer without major deterioration and minimum maintenance while keeping its original function. Naturally, durability expectations vary per individual item; outdoor wear is expected to last for over five years while underwear is expected to last around three years[[3]](#footnote-3). Durability furthermore depends on the design, product and manufacturing choices and the use phase of the textile.

**2. Recyclability requirements**

Another important aspect when it comes to sustainably design a textile is its recyclability. It is to a large extend determined by the used recycling technology (e.g., mechanical, chemical or thermal recycling), the fibres and chemicals used during the production process and the subsequent sorting process. The introduction of recyclability requirements for textiles should be considered under readily available current technology, even though it is expected that innovative fibre-to-fibre technologies will substantially expand their capacities in the coming years[[4]](#footnote-4).

**3. Recycled fibre-to-fibre content incorporation**

Lastly, EuRIC advocates for the introduction of mandatory recycled content targets for textiles whereby recycled content means that a certain percentage of a recycled textile fibre from post-consumer textiles is put into a new textile and should not be understood as the incorporation of other recycled materials (e.g. rPET) into a new textile. Setting minimum fibre-to-fibre recycled content targets could stimulate the development of sorting and recycling technologies[[5]](#footnote-5), and has an overall large potential for great environmental improvement[[6]](#footnote-6).

EuRIC strongly advocates for balancing the various ecodesign principles in a proportionate way as certain trade-offs will occur. For example, the inclusion of recycled content or the design for recyclability may hinder the design for durability and vice versa. Nevertheless, introducing ecodesign principles such as design for durability and recyclability as well as the inclusion of post-consumer recycled content is of utmost importance to move away from a linear economy for textiles. As highlighted in a recently published study commissioned by EuRIC Textiles[[7]](#footnote-7), reuse followed by recycling have a much smaller environmental footprint than producing new textile items and therefore remain the best environmental options to treat the large amounts of textile waste.

**d) Strategic autonomy**

**e) Role and target substances of concern**

**f) Policy coherence with product-specific and horizontal legislation**

In terms of policy coherence there is currently no specific legislation in place that puts a focus on textiles reuse and recycling. The EU Strategy for Circular and Sustainable Textiles which was published in March 2022 aims to change that by putting many ambitious actions forward including mandatory performance requirements for the environmental sustainability of textile products and a Digital Product Passport for textiles with information requirements on environmental sustainability.

1. EEA: Textiles and the environment: the role of design in Europe’s circular economy (2019) [↑](#footnote-ref-1)
2. COM(2022) 141 final (2022) [↑](#footnote-ref-2)
3. WRAP: Sustainable Clothing – A practical guide to enhancing clothing durability and quality (2017) [↑](#footnote-ref-3)
4. McKinsey & Company - Scaling textile recycling in Europe—turning waste into value (2022) [↑](#footnote-ref-4)
5. OVAM: Ecodesign criteria for consumer textiles (2021) [↑](#footnote-ref-5)
6. JRC – ESPR – Preliminary study on new product priorities (2023) [↑](#footnote-ref-6)
7. [LCA-based assessment of the management of European used textiles (2023)](https://euric-aisbl.eu/resource-hub/reports-studies/study-lca-based-assessment-of-the-management-of-european-used-textiles) [↑](#footnote-ref-7)