

HEJSupport comments to the EU Commission Roadmap for an EU strategy for sustainable textiles

HEJSupport welcomes the EU strategy for sustainable textiles Roadmap' and the EU Commission's initiative to address the impacts of textiles. We agree that the application of sustainability principles in the textile sector will improve natural resource efficiency, minimise waste, improve working conditions, gender equality and human rights. We believe that the Textile Strategy has the capacity of becoming a framework that unites legal instruments, practices, and initiatives in the textile sector throughout product life-cycle.

To succeed, the Textile Strategy should be based on the principles of a safe circular economy that eliminates toxic chemicals in the materials cycle, ensures less extraction of raw materials and increases the use of materials already in circulation in the most efficient way. This approach will save energy and water, provide safer chemicals and non-chemical alternatives, thus having a positive impact on climate change, ecosystem integrity, food production systems and human health. However, circular material flows can only be safe if they are free from hazardous chemicals or if hazardous chemicals that cannot be phased out are strictly regulated.

This paper includes our ideas and recommendations to the Roadmap. The ideas are built on our recent report [“Sustainable Fashion? How companies provide sustainability information to consumers”](#), research and analysis that we conducted in the last three years. We look forward to engaging further in the Textile Strategy initiative, starting with the forthcoming public consultation.

Problem definition

The Roadmap correctly identifies key challenges faced by the textile industry, including:

- Intensive use of primary raw materials and water;
- GHG emissions;
- Low recycling rates;
- The presence of toxic chemicals that complicates recycling, pollutes the environment and harms people's health;
- Production taking place in other regions of the world with often lower production costs and environmental and social standards.
- Violation of human rights, women's rights and labor rights

We agree that being among the most polluting industries, textile industry has to explore ways of becoming sustainable to minimize resource use and pollution, improve the safety

of workers, eliminate sexual abuse, and ensure the right of consumers to make an informed choice. The Textile Strategy should recognise that the future of sustainable textiles largely depends on its ability to reduce the use of resources, such as land, water and oil, ensure reuse and recycle of products to minimize waste. In addition, there are other aspects of sustainability that the Textile Strategy should focus on, including protection of the environment and human health, occupational safety, gender equity and women's empowerment, as well as meeting the demand of consumers for eco-friendly textile products. In addition, the Textile Strategy should include measures to raise the capacity and awareness of industry, politics, and civil society in low- and middle income production countries, to tackle problems at source.

Increasing consumer awareness

Though the Textile strategy notes the need “to reinforce the protection of human rights, environmental duty of care and due diligence across value chains” more attention should be paid on the importance of increasing consumers' awareness of consumerism and the associated environmental and health risk. Consumers play a key role in the sustainability of the textile sector, even though they are often not aware of this. For consumers to make informed decisions regarding their clothing, they must be aware of the issue at hand.

Awareness involves not only having the information, but also ensuring it is easily understood and accessible by all. Adopting an environmentally friendly laundry regime is an example of how better knowledge could change people's habits.

Nevertheless, our recent analysis of product sustainability information available to consumers revealed that:

- Companies engage increasingly in information flow within the supply chain but do little to inform consumers.
- Some product sustainability claims are not advanced enough for broad application and implementation, which is misleading for consumers.
- Companies usually do not communicate with consumers directly on those topics to find out their needs.
- Companies do not train retailers and sales consultants to explain the meaning of product sustainability claims, thereby depriving them of the opportunity to be a source of information for consumers.
- There is a discrepancy between the number of sustainability labels on the product and the actual information on product sustainability available to consumers on-line.
- Textile companies are often members of initiatives like Sustainable Apparel Coalition, Better Cotton Initiative, ZDHC Programme, IPE DETOX platform and Partnership for Sustainable Textile. However, consumers remain largely unaware about such sustainability initiatives because no information is provided on the products they purchase. For example, not all targeted companies use BCI label on

their products, thus depriving consumers from knowing about company's sustainability efforts.

- General sustainability claims are often limited to commitments and plans while no real proof of action/impact is available.
- Companies like to develop labels of their own or use labels that present commitments instead of using monitored labels that require strict obligations.
- Companies advertise flagship articles highlighting that their products are made of recycled materials or postconsumer waste, which might be misleading to consumers. Often no information about toxic chemicals in clothing and textile products is available. Products made of recycled plastic or postconsumer waste may pose similar risk to the environment and human health as the original product, however no information about toxic chemicals in clothing made of recycled materials is provided.

Make consumers a driving force for sustainability

The Textile Strategy should encourage regular survey of consumer demands for product sustainability information in the garment industry to improve the relevant information provided to consumers. Information on toxic chemicals in clothing and textile should become part of information on how companies reduce their impact on the environment and should be made available to consumers. Product sustainability claims should be oriented on the proof of action to reduce negative environmental and social impact throughout the supply chain and from manufacturing up to labelling and should not be limited to commitments and plans only.

Furthermore, the Textile Strategy can initiate regularly updated electronic and smart phone applications and links to product sustainability information to ensure trustworthy information provision to consumers in a timely manner. Information on product sustainability claims from various retail companies and fashion brands should be provided at a one-stop clearing house website that is publicly accessible and regularly updated. The sustainability claims on products should be reliable, traceable, backed by science and the civil society organisations, verified by the third party, be accessible and transparent.

In addition, the Textile Strategy can help establish a list of environmental labels for textile products that consumers can trust, including Type 1 ISO ecolabels (e.g. EU Ecolabel, Nordic Swan, Blue Angel) and independently verified labels (GOTS, bluesign, Blue Angel). These labels provide full transparency and meaningful criteria for a healthy environment and social justice. The Textile Strategy should on the opposite discourage companies from using labels that present commitments instead of using monitored labels that require strict obligations.

Circularity

Circularity in the textile and fashion industry means closing the loops in production thus making brands responsible for collecting and processing as much as they produce to

maintain textile resources in circulation. A real circular economy is where the manufacturer is responsible for ultimate disposal and therefore re-designs the product to make disposal more feasible and environmentally sound. Besides, safe circularity requires all materials to be free from hazardous chemicals and ready for reuse and safe recycling.

The Textile Strategy is an opportunity to encourage all businesses along the supply chain of textile sector know and share information about the materials, ingredients and especially harmful chemicals being used in the products they manufacture, use and sell. A full transparent supply chain is the key for sustainability in the textile industry.

The new initiative towards green transformation of the textile sector should include the phase out of harmful chemicals from textile products and processes, and use safe alternatives, including non-chemical alternatives. Investing into research and development of safer non-toxic and non-chemical alternatives in the textile industry will help achieve a non-toxic circular economy which is the cornerstone of sustainable textile.

The Textile Strategy can provide a unique opportunity to set up globally agreed requirements to ensure the availability and accessibility of information on hazardous chemicals in textile products throughout the product life cycle. Transparency and traceability that contribute to preventing the presence of chemicals of concern in products and the associated material flows are at the core of a circular economy that should be safe to human health and the environment.

Noting that supply chains for many materials and products in the textile sector are multi-national, the spread of chemicals of concern in them is hard to address until harmonized global actions are adopted. However, the lack of globally agreed requirements to ensure the availability and accessibility of information on hazardous chemicals in textile products throughout the product life cycle leads to continued contamination of the supply chain. The Textile Strategy could play the leading role in developing global information requirements that would eliminate this obstacle and improve progress in the work between countries.

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