

Response to JRC's Preparatory study on textiles for product policy instruments (Ecodesign)

Written by Tone S. Tobiasson, journalist and author.

Firstly, I would like to thank JRC for opening up the dialogue with stakeholders for feedback and answering very honestly some difficult questions during the two-day session online. As I was called on to ask "my" questions both days, and I am not able to deliver my feedback in the online format (Norwegian cell-phone numbers lack one digit in order to get the code to get a password), I am therefore using the second option offered: To send additional documents via email.

I have earlier contributed with feedback, as part of a group and research project (Fletcher et al., 2023), and I am concerned that the insights previously delivered not have been considered properly in this preparatory study. I may be wrong, but when reading the preparatory study, I am struck by how the document is an attempt to make the landscape adhere to the map (EU's Textile strategy) and not the opposite: make reality dictate what policy strives to fix. During the two-day online sessions several of us felt very much that JRC have had their hands tied and thus have only included references and research that serves a predetermined strategy; rather than adjusting policy to the knowledge that exists.

JRC said as much during the two-day sessions: Lack of data has forced them to make some assumptions. The question remains if these assumptions are actually right, or in line with knowledge that is available.

One thing JRC asked for, was research to guide on how lifespan relates to durability, and also if recycling is viable as an industry in Europe; I will answer both below, as promised in the on-line sessions by me to you. I have kept my word, and I hope this knowledge will be taken seriously.

Firstly, I would like to offer some overall comments, because even though JRC did say that you talk to others, not 'siloining', I believe this is true only to a certain degree.

Textiles are deeply rooted in Europe's history and culture. They are part of our daily lives and our identities as indigenous people and/or nations. In dealing with the great and frightening environmental challenges, we must not forget that the production and consumption of textiles is also part of what we want to protect and safe-guard. Production of textile raw materials can also have an important positive impact on the climate and, through for example grazing, also hinder bio-diversity loss (Klepp & Tobiasson, 2022). Local production, home production and textile craft traditions are important in people's lives and in making the textile ecosystem more robust and diverse. In Norway, our Crown Princess recently arranged a weaving symposium that was full of artisans and practitioners, and set the scene for recruiting the younger generation into crafts and small-scale industry. Several measures have been initiated to utilize more of EU's own wool, where approximately 80% is not utilized today (Klepp & Tobiasson, 2022) and the same day that the Crown Princess had her symposium, we were visited by Portuguese Rosa Pomar, who on her own, has spearheaded a revival of the use of Portuguese indigenous sheep breeds in knitting wool. The positive contribution that small-scale and local businesses contribute - and could contribute - must be taken seriously, and it must be ensured that regulations do not hinder this.

The document has little focus on these more positive aspects of textile production and consumption. It is particularly problematic because several of the possible measures will affect small and vulnerable businesses, and not least the cultural preservation safeguarded by voluntary organizations. It can be anything from requirements for documentation (which is often expensive and difficult for small businesses), requirements for recycled content, or rules against the use of traditional materials such

as fur (which does not have to originate in farmed furs, rather from hunting or herding). The textile field has a lot to learn from food, where culture and tradition – under the headline of healthy and good food – have been used more in the promotion of alternatives to mass-produced global, industrial products. Alternatives are also needed when working with textiles. These are absent from the preparatory study document (except a mention of local at the very end in Table 65) - and unfortunately as far as I know - from EU's Textile Strategy in general.

By aligning with the New European Bauhaus and the EU Soil Mission, this could, however, be brought forward. Every time I bring this up in EU meetings, there is a general embarrassment that these are not seen as related.

Which then brings me to the first ask JRC had of me. The Swedish IVL paper, which you had clearly not heard of, states: “Peters and colleagues conclude that this is within the range estimated by other studies of these sectors (from 0.3 to 4 billion t CO₂ eq.) conclude that for Sweden, clothing contributes to about 3% of the consumption-based carbon footprint, or 327 kg CO₂ eq. per capita per year. In the present report, we consider not only recycling of clothing textiles, but also home textiles and potentially other textiles. Let us assume the textile consumption in the EU is responsible for 3% of our consumption-based carbon footprint. And let us consider that the per-capita consumption-based carbon footprint in the EU is 7 t CO₂ equivalents per year (Our World in Data 2023) and the population of the EU is 448.4 million (Eurostat 2023c) (which results in an annual carbon consumption based carbon footprint of about 3.2 billion t CO₂ eq. for the EU). Then the annual climate impact of textile products purchased in the EU is about 94 million t CO₂ eq. This means that the above estimated climate-impact reduction of large-scale textile to-textile recycling, of on average 1.2 million t CO₂ eq., corresponds to a 1.3% reduction of the climate impact of textile products purchased in the EU. We consider this to be a relatively small contribution to the reduction needed for the carbon footprint of textile products.” (Sandin Albertsson, G., Lidfeldt, M., Nellström, M., Strandberg, J., Billstein, T., Hammar, T., & Larsson, M., 2024).

When JRC's own research, in addition, says that only 11% of consumers actually want recycled content in their apparel or footwear, why is the EU so set on this? Consumers actually prefer natural fibers and consider them to be sustainable (Sigaard, A. S., & Laitala, K., 2023). A conversation with a person from Euratex enlightened me. According to him, it was a fluke that EU had decided that recycling should be a major push. Without any data to underpin this, no reasoning, it just happened, so if my Euratex source is right, this is very disturbing. Is this indicative of the several “assumptions” being made?

The main issue for ESPR is that this addresses problems at the product level, when the “problem” is not at a product level, but at a systemic level. As long as there is massive over-production with sophisticated marketing, a constant influx of new products, there is no possibility to “use up” products, there is no incentive to repair, and there is no need or incentive or recycled content, we have a system that has hijacked ecodesign per se, when ecodesign can only work outside a system of perpetual growth, not within. A system of scarcity would work, yes, but what we have is a system of abundance. In the current system, the constant influx of new stuff will kill any ESPR effect.

This said, there is the last ask from JRC that I would like to address. The functional unit, measuring the use phase and addressing “durability” – or rather Duration of Service.

The background paper discusses this at length, but here again, definitions and assumptions wrongly reign and confuse. But, behold, the problem is solved:

Two of the researchers you cite have just now developed a new method to capture your ask! Not to measure “emotional” durability (bad wording) but to capture the intrinsic quality or Duration of Service of apparel (Laitala & Klepp, 2024). This can be done now and very quickly ensure a level playing field that captures the actual life span and DoS. And that *then* can be translated to ecodesign in a meaningful way. No “forced assumptions”, just data and facts that underpin good policy decisions. Only one third of apparel goes out of use because it is used up (Klepp & Laitala, 2022), so it is time to accept that durability, repairability, recyclability and a demand for recycled content is a dead end. Unless you forbid on a massive level, imports to the EU based on synthetic content or other ecodesign measures, that are much easier to implement.

References:

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