

Feedback to the ECOBALYSE consultation

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This is a short feedback document to the French ECOBALYSE consultation on textiles. The feedback is based on the available online information on how weighting of different aspects is measured, and has been reviewed by using Google translate. This may have led to misunderstandings, but we hope this does not detract from the main feedback in this document. The feedback is submitted from Consumption Research Norway (SIFO) at Oslo Metropolitan University and is based on over 20 years of research in the field of consumption, environmental issues and textiles. SIFO has actively contributed with feedback to EU's Textile Strategy, including on PEFCR, ESPR, the Waste Framework directive, etc. To see more of this feedback, please see:

<https://clothingresearch.oslomet.no/hearings-and-policy-papers/>

For more on SIFO's Clothing research, see:

<https://clothingresearch.oslomet.no/about-us/>

Favoring plastics (and thus Fast Fashion)

We commend the French government and ECOBALYSE in genuinely wanting to halt Fast Fashion (FF) and putting forward legislation that aims to do exactly this. However, we believe that something must be done about the fact that the tool underpinning the labelling scheme currently favors plastics. This is serious if a labeling scheme which is intended to show what products are better for the environment, ends up supporting FF by promoting the continued plastification of apparel and footwear. If the result of the system does not give natural materials a higher score than plastic materials, the scheme should not be used, as it will encourage FF and Ultra Fast Fashion (UFF). We further believe that it is high time that the discourse on apparel and the environment is adapted to the important political goal of ridding the world of plastic and microplastic pollution, and the major environmental and climate challenges that increased use of fossil materials entails. With this as a backdrop, we would like to address the issue of lifespan and duration of service in the proposed policy, which is our expertise.

Defining Fast Fashion

It is commendable that Ecobalyse includes an operationalized definition of Fast and Ultra Fast Fashion. We think both the use of price and length of market presence are good indicators. For the length of time a product is on the market, we are a bit confused by the longest and shortest intervals, and thereby that everything above and below 65 and 300 days is flat. What about clothes (or shoes) that have been on the market for many decades versus just one week? We have clothes from Norwegian brands that have been unchanged for more than 30 years. We do not know the research or the reasons behind the choice of the numbers, but it would be interesting to investigate this further. A long time on the market for a given product, is not only an indication of durable design, but also gives companies time for good product development and testing of the goods. Thus, there are several good reasons to "punish" a short timespan on the market.

For a product that has "sustained" 30 years on the market, see f ex:

<https://www.facebook.com/Norlender/posts/pfbid02c7FLbo6q1PA5SC76NGvdrJ7APotwvgCTdNPcTsMMkqHh9MFBhMyijKy2tXvRW7PEI>

Selling apparel is highly driven by marketing. We believe that more about marketing could have been included in the definition of FF and UFF. Like the length of time on the market, this could be derived from different marketing indicators, such as how much is sold at reduced prices (on sale), and how much money is spent on marketing. The latter would need to include all types of marketing, including sponsoring of influencers, etc.

Durability/Duration of Service (DoS)

It is a good thing that the aspect that is most important for the overall environmental impact (how long/how much each garment is used) has been attempted integrated by Ecobalyse. It may therefore be disappointing that this should only be calculated as 7% of the products' environmental impact, but it is possible that it has been chosen more based on the uncertainty in the calculation than on the importance of this aspect? It is not so easy to give good feedback on the way this is done, because of lack of background documents. In general, we would say that it is problematic when durability is confused with Duration of Service also referred to as «lifetime»: *"(...) product lifetime in Apparel & Footwear is subject to three influences: a. the intrinsic durability of the product b. the extrinsic durability and c. the reparability of the product"*.

As far as we know, there is very little research that indicates that more durable apparel is used longer than other apparel. As far as we are aware, there has been no investigation into the impact of the indicators that ECOBALYSE suggests on durability, such as length of time on the market, or access to repair services, related to the actual Duration of Service. In other words, we do not know whether clothes that are marketed/sold for a short time have a shorter lifespan with consumers. This is a weakness of the ECOBALYSE proposal. Although this is a good indicator of a type of marketing (or type of business model we can call FF or UFF) it does not say anything about longevity/lifetime.

Furthermore, any use of technical strength as an indicator of potential lifetime will favor the strongest materials (plastics). Here, too, there is a lack of documentation on the connection between durability and lifetime/DoS.

SIFO proposes to solve these problems by actually investigating DoS at company level and then allocating the companies a DoS score instead of using the more uncertain indicator "durability".

Lifetime/DoS could thus be included in the definition of FF and UFF, instead of letting durability become a proxy for DoS.

This can be done via analyzes of waste as we have proposed for Extended Producer Responsibility (<https://clothingresearch.oslomet.no/2022/10/24/how-to-make-sure-extended-producer-responsibility-becomes-a-silver-bullet/>) or it can be done with a new method we have developed for this purpose, called Waste Audit Interviews (<https://clothingresearch.oslomet.no/2024/04/18/new-method-to-capture-relationship-between-properties-and-use/>). There are also problematic issues related to measuring technical durability, because we often treat what we think is 'weak' or what we care about with more care - so in practice a strong polyester tie will not necessarily last longer - or be used longer - than a weak silk tie.

Thus, our proposed methods do not differentiate on the basis of why something is used for a long time (e.g. product qualities, price, marketing, offer of repair services), but look at the effect at product or company level. Our proposed methods simplify this with DoS considerably and DoS is made more dependable (because we then get empirical evidence that is not based on assumptions), and means that DoS and the consumer phase can actually count for much more than 7% in an overall assessment of a product's environmental impact.

Consumer rights

Labeling of products' environmental impact may have the undesired side effect such that an increase in actual consumption. This can happen as a result of some products being perceived as "green" and thus the resistance to buying something new is lower, or because another element to consider means that other parameters (such as the apparel actually fitting the style, taste, body, occasion and wardrobe) are downgraded. This in turn can lead to more mis-purchases and overall, more purchases. We therefore believe that the marketing of products as "greener" should only be done if the difference is well documented, substantial and comprehensible to consumers (these three points were stressed by the Norwegian Consumer Agency after the Higg label was deemed unlawful in marketing of apparel).

Complex systems and tools (such as PEFCR and ECOBALYSE) are in danger of undermining consumers' rights because they are too complex to understand and not based on current knowledge and research. The dangers of such systems and the unintended possible negative consequences should be investigated, before they are implemented. This applies regardless of whether the systems or tools are used to label products, or indirectly influence consumers through decisions at company level (for example in material choices).

We are not convinced that ECOBALYSE is fit for purpose as it stands today, both because of the problems surrounding the favoring of plastics, the lack of documentation, the complexity of the calculations - and not least the confusion of durability with DoS. On the other hand, we think that it is a good start to define FF and UFF, and integrating marketing into the discussion about apparel and the environment.

If you would like to discuss this further with us, you are more than welcome to contact us.