



## Comments on EU strategy for sustainable textiles

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SBS welcomes the consultation on the Roadmap for an EU strategy for sustainable textiles. The implementation of sustainability and circular economy principles in relation to the textile sector is very much welcomed. It represents a great development opportunity for companies, including SMEs, which are a big part of the textile and textile care sector in Europe.

We would like to highlight a series of aspects in relation to the roadmap and the future EU strategy on sustainable textiles:

### 1. Strengthening of the EU infrastructure and production capacities

The textile sector is an important sector for SMEs. The implementation of the circular economy principles and the transformation of waste into new resources to be re-employed in the production cycle, represent a great development opportunity for companies.

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The roadmap also highlights the need to incentivise ‘product as a service’ and other sustainable business models. To this respect SBS would like to highlight the role of the textile care sector. This sector is an SME driven sector where local and regional players –laundries and dry-cleaning companies –are key to provide all sorts of functional Personal Protective Equipment (PPE) clothing and other clothing and textiles reprocessed on a regular basis. They serve customers in their region with services and products that are rented. Their business principle is, that these products should be reprocessible as often as possible –a core concept of a circular economy. By ensuring better reprocessability and repairability of textiles the textile care sector could be strengthened and ensure the local supply of PPE clothing and textiles while saving resources.

### 2. Quotas for the re-use of textiles

The EU Commission has rightly recognised the textile sector as a key sector in relation to the circular economy. Considering the potential that lies in the reuse of textiles in both the B2B and B2C sector, it is important to stress that not only the value chains in production and the consumption of raw materials are important for the sustainability of certain products but that the usage cycle is also of utmost importance. With respect to textiles, this is where the greatest sustainability potential lies.

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### **3. Strengthening green public procurement**

Public procurement processes should include more elements of circularity. A procurement process focused on prices for products and services does not consider the costs during a longer period such as the costs stemming from the limited lifespan of products when they have to be replaced earlier than products with longer lifecycles or with possibilities for repair and reuse. It also ignores the environmental costs and loss of resources along production chains.

PPE clothing or disposable surgical drapes and gowns, which cannot be reprocessed properly, consume much more natural resources. Thus, textiles for public procurement (hospitals, workwear, for example from fire brigades, rescue services, police, military) would have enormous sustainability potential if procurement was based on the principle of "product-as-a-service", as product-as-a-service incentivises durability and repairs and allows for effective and scalable recycling.

### **4. Support sustainable product design**

In addition to the sustainable production of textiles and clothing, the aim should be to increase the number of usage cycles. This is possible with the help of the production of long-lasting, recyclable and repairable textiles and clothing. If aspects such as "reuse, reprocessing, reparability and recyclability" were considered more often in product standards, a lot of resources could be saved - not only in textiles - since all products can be used longer in the cycle. Embedding eco-design aspects in product standards along the supply chain will therefore play a decisive role in sustainability.

To achieve a circular economy for workwear and protective clothing for example, criteria and standards for a clear recognition of repairable and recyclable clothing should be available (similar to the EU energy labels).

### **5. Need for end of waste legislation**

From our perspective textiles should follow a hierarchy of value retention. Products as a service, reuse and reparability should be promoted in the first place. When this is not possible anymore, recycling and reuse as secondary raw materials should be further promoted.

According to the Waste Directive (2018/851), EU countries will be obliged to collect textiles separately by 2025. In order to make the reuse of waste to produce new textiles and products a reality, it is necessary to create a European regulation containing End of Waste legislation for such materials and to encourage designers to use recycled raw materials and to simplify recycling operations at the end of the products' life. This legislation would guarantee a correct and smoother commercial circulation of the reusable products obtained from their treatment and selection, as well as a level playing field in the European market.



## 6. European Standards play an important role

The future EU strategy should also consider the role of standards developed by the European Standards Organisations in ensuring a more sustainable textile sector. Standards can support the sustainability of the sector by supporting the establishment of specifications related to reuse, reprocessing, repairability, recyclability and quality of secondary raw materials. This would help changing production chains to develop products which are designed and fitted for a circular use.

With the New PPE Regulation (2016/425) and Medical Device Regulation (2017/745) several European standards will be revised to be harmonised with the provisions of these new regulations. The focus of these Regulations is on health and safety, nevertheless, the possibility to incorporate the circular thinking when revising these standards should also be considered.

