
Finnish Textile & Fashion Association's views on ESPR product categories and requirements

Finnish Textile and Fashion takes a positive view on developing the environmental sustainability of textile products. The EU's proposed ecodesign for sustainable products regulation (ESPR) extensively comments on the sustainability, durability, reparability and recyclability of products, as well as on the provision of information related to environmental sustainability.

At best, the actions in the proposed regulation will increase the number of more environmentally sustainable products in EU, but they will also set significantly more requirements for products and companies. For this reason, it is difficult to assess the impacts for business in advance. The preparation and enforcement of the regulation should particularly account for the resources of small companies, since 88% of European companies in the textile and clothing industry, for example, are micro enterprises (fewer than 10 employees) and 11% are SMEs. In addition to targeted support, companies should be guaranteed a sufficient transition period to fulfil the new requirements.

ECODESIGN REQUIREMENTS MUST BE PLANNED CAREFULLY FOR DIFFERENT PRODUCT GROUPS

Textile products are a very heterogenous product group. In addition to clothing and home textiles targeted at consumers, for example, textile products include health care and hygiene textiles, work and protective clothing, textiles for public spaces and geotextiles. The ecodesign requirements should primarily be targeted at the product groups with the largest environmental impacts, such as consumer-targeted products, which constitute over 50% of textile production in the EU. It is important to account for the perspectives of textile industry companies when preparing the criteria for specific product groups, as they are the ones who have to comply to new regulations.

The goal at the heart of ecodesign requirements should be to improve the products' durability. According to estimates, 89% of the Finnish textile and clothing industry's indirect (scope 3) emissions are caused by textile fibre and material production. Doubling the life cycle of products could reduce the industry's global emissions by almost half.

The quality of textile products is directly connected to product reusability and reparability. It's more likely that high quality products will be reused and repaired. However, repairing products is not currently an appealing prospect to consumers due to the high price of repairs. Instead, many would rather buy a new product. Repairing products should be made more worthwhile for both consumers and companies.

The emotional durability of consumer products should also be equally considered alongside technical quality, as fast fashion is the most likely aspect leading to low quality products.

Assessing the environmental impacts of products requires harmonized and product-specific calculation methods that enable comparable and reliable communication. This benefits both consumers and companies in the green transition, provided that environmental databases are kept open for economic operators.

TECHNICAL TEXTILES AND PERSONAL PROTECTIVE EQUIPMENT OUT OF THE SCOPE

It is unnecessary to include personal protective equipment and their compliance verification in the proposed regulation. Personal protective equipment, which includes items such as protective clothing, is already regulated in terms of product features and information requirements. As a result, personal protective equipment should be left out of the proposed regulation, and ecodesign requirements should not be targeted at them.

Also technical textiles have requirements and properties that aim at protection and hygiene, for instance, that are essential for their functionality, and offer solutions in various products. The ecodesign criteria should not act as an obstacle and therefore, technical textiles should not be covered.

RECYCLED FIBRE GOALS SHOULD BE KEPT REASONABLE

The ecodesign requirements propose obligations related to the use of recycled fibre. Increasing the use of recycled fibre supports emission reductions and tackles biodiversity loss, if it reduces the need for virgin fibre. Equal obligations accelerate the industry's transition towards a circular economy.

Nevertheless, it should be noted that not all recycled fibre in the market is suitable for all products, so using recycled fibre may conflict with product quality and durability. Currently, recycled fibre in the textile industry is still mostly mechanically recycled whose quality is not equal to virgin fibre. This should be considered when creating quality criteria. As such, the goals related to recycled fibre in products should be kept reasonable. Regularly using even a small amount of recycled fibre has positive impacts. In addition, more focus should be placed on different recycling methods, such as chemical recycling, if there is a desire to establish mandatory requirements for the use of recycled fibre in textile products. Now, the availability of higher quality recycled fibre is limited.

For circular economy, using renewable resources is equally important. This should be kept in mind, and not only focus on recycled content. The industry is developing new man-made cellulosic textile fibres, which are more environmentally friendlier than the traditional fibres. New regulation should support these new technologies.

A HOLISTIC VIEW ON ENVIRONMENTAL SUSTAINABILITY NEEDED

Focusing on quality, recycled content and recyclability should not come at the expense of other environmental aspects. We should also keep in mind a holistic approach, which looks at the whole lifecycle of textile products and their overall impact.

Restricting harmful chemicals is important for the textiles industry. We shouldn't make additional requirements regarding chemicals through ESPR but focus on developing the REACH regulation.

The European Parliament has proposed that social sustainability criteria should be considered in the regulation alongside environmental sustainability. Human rights,

labour rights and occupational safety are essential parts of the textile and fashion industry's operations. That said, it is our view that the promotion of social responsibility must be targeted at the entire business, not individual products, and it should be developed through the EU's corporate social responsibility legislation.

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