DELIVERING EU ENVIRONMENTAL POLICY THROUGH FAIR COMPARISONS OF NATURAL AND SYNTHETIC FIBRE TEXTILES IN PEF

Executive Summary

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Sustainability has become a priority objective for the European Union (EU). It is a key driver for policy development through the global leadership role the EU has taken in addressing climate change, decoupling economic growth from resource use, and the sustainable use of resources. The global supply of textiles has been recognized by the EU as a major source of emissions and resource use; the sector has become increasingly reliant on fossil feedstocks to supply synthetic fibres, and the textile industry has been roundly criticised for unsustainable and non-circular consumption patterns.

The Product Environmental Footprint (PEF) system – which assesses a product's environmental impact and provides consumers with information on that impact – has the potential to be paramount in directing the textile sector towards a sustainable system of production and consumption. However, the PEF system has not been designed to deliver the EU's strategies and, without amendment, its application to the textiles sector risks undermining the EU's laudable intent. The PEF system is designed to facilitate like-with-like comparisons, but assessment of textiles made from natural and synthetic fibres are not yet comparable because the impacts of forming natural fibres are fully accounted for, but omitted for fossil fuels. The single biggest sustainability issue for the textile industry is the growth in synthetic fibre production and the causally related rise in fast fashion. A PEF-derived comparison will not challenge the over-consumption of resources, and risks legitimising unsustainable consumption with an EU-backed green claim.

These limitations present a significant challenge to the delivery of both EU strategy and the PEF goal of providing fair comparisons of products based on their environmental credentials.

In combination, the characteristics of the textiles category, together with the limitations of PEF methodology, provide a strong argument for not comparing textiles made from renewable and non-renewable raw materials. However, achieving the EU Green Deal and circular economy objectives mandates a pragmatic approach; hence our analysis recommends methodological improvements to deliver EU environmental policy through fair comparisons of natural and synthetic fibre textiles in PEF. Addressing these limitations now will avoid the same problems arising when PEF is applied to other product categories that compare renewable and non-renewable raw materials, such as furniture and fuel.

Current concerns with the PEF methodology as it stands

There are critical environmental impacts that either aren't fully accounted for, or aren't included in the PEF methodology, that could significantly distort the credibility of the EU's environmental impact ratings of clothing and footwear products.

FULL IMPACT OF FOSSIL FUELS

PRODUCTION PRACTICES

MICROPLASTIC POLLUTION

RENEWABILITY & BIODEGRADABILITY

DURATION OF SERVICE LIFE

For consumers to understand the sustainability credentials of a product, they also need information on social impacts.

SOCIAL IMPACTS

Our analysis has identified the main challenges the PEF system poses to an equal comparison of products made from natural and synthetic fibres, and presents pragmatic recommendations to better align the methodology with the EU's Green Deal and circular economy objectives:

1

The PEF system must include impacts from microplastics to be consistent with EU expectations, strategies and communications, and to follow the precautionary principle. Omitting microplastics as an indicator effectively assigns zero impacts to this emission, which risks unintentionally guiding consumers towards plastic products and fibres, further increasing microplastic emissions. Similarly, omitting microplastics from the PEF single score and relegating the results to fields that are invisible to consumers (i.e., the 'Additional information' section of a PEF report) will not influence their purchasing choices. Microplastics can be added as an inventory-level indicator ahead of complete integration into the PEF system.

2

The PEF system must include a plastic waste indicator to be consistent with EU directives on plastic waste. This indicator would have broad applicability across product categories, including disposal of textiles made from synthetic fibres/plastics. There is a need to reduce the volume of plastic waste by reducing the demand for this material, and/or by diverting plastic away from landfill to preferred end of life processes, including fibre recycling. At present, the recycling of synthetic fibres is negligible, and end of life energy recovery is not sustainable because the incineration of plastic waste releases fossil CO_2.

3

The PEF system must include a circularity indicator to be consistent with the Circular Economy Action Plan (CEAP). Fossil materials are not renewable or circular and currently, none of the 16 PEF indicators directly measure circularity. Renewable and biodegradable raw materials (i.e., natural fibres) are inherently circular and more sustainable than those made from fossil feedstocks which resist biodegradation (i.e., synthetics). Including circularity as an indicator in PEF is the best means of equitably assessing the sustainability of raw materials originating from renewable and non-renewable sources.

This document is an Executive Summary. For detailed recommendations, references, and author credits, please access the full report here: www.makethelabelcount.org/PEF-whitepaper-May-2022

Efforts to introduce EU-harmonised assessment criteria that enable leveraging the power of the EU Single Market to transition global supply chains towards more sustainable production and consumption are laudable. However, the PEF system, in its current form, is not yet ready to deliver key EU environmental policies including the Green Deal and CEAP, nor is the method adequate to provide fair comparisons between products made from natural and synthetic raw materials.

Until these methodological limitations of the PEF system have been addressed, fair comparisons of products made from renewable and non-renewable raw materials are not possible, and the use of PEF scores to inform product labelling or substantiate green claims may mislead well-intended consumers. Failure to address these limitations now risks entrenching a system that is counter-productive to EU environmental policy, and misses opportunities for the transition to a circular economy.

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