



Brussels, Belgium  
18 October 2022

## **Subject: Ensuring EU textile legislation does not licence greenwashing**

Dear President and Members of the European Commission,

The fashion and textiles industry must urgently reform if it is to mitigate its negative impact on people and the planet. We, the undersigned signatories of the Make the Label Count campaign, applaud the European Commission's ambitious proposals for sustainable textiles under the EU Green Deal and support the EU on its journey to become climate neutral and circular by 2050. However, if not done properly, EU textile legislation could give licence to greenwashing.

Ensuring that consumers can easily access reliable information about a garment's environmental impact and make responsible purchasing choices is key to driving the necessary changes in the textiles sector. In an industry flooded with greenwashing, facilitated by brand-dominated and self-governed definitions of 'sustainability', the need for regulation and harmonised sustainability language for consumers has never been more important.

This was signalled by consumer authorities in both the Netherlands and Norway when they issued joint guidance<sup>1</sup> on the use of the Higg Material Sustainability Index (MSI) tool to communicate product sustainability, stating that environmental claims based on the Higg MSI methodology need to be revised to mitigate the risk of misleading consumers.

These guidelines are based on the interpretation of current EU consumer law and confirm the shortcomings of current life cycle assessment-based methods used to quantify the environmental impacts of textile products. The two authorities send a timely and important message to the fashion industry and governments - environmental claims need to be accurate if they are to empower consumers to make well-informed and truly impactful purchasing decisions.

Therefore, we commend the European Commission's decision to regulate ecodesign requirements and the substantiation of green claims made by companies. If done right, this will be a game-changing and fair sustainability framework that can serve as an educational tool for the public, as well as an influential example of best practice for governments across the world. If done wrong, this will simply give the industry a licence to greenwash with catastrophic results.

The Commission maintains that a sustainable textile industry can only be the result of a combination of existing and upcoming policies. However, we ask for greater clarity from the Commission as to the interplay between these various policy initiatives and the tools which will deliver them. While the Commission is yet to confirm the tools it intends to deploy to underpin the assessment of claims, recent communications indicate that the Product Environmental Footprint (PEF) will be the primary tool used<sup>2</sup>.

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<sup>1</sup> [Guidance to the Sustainable Apparel Coalition](#), October 2022

<sup>2</sup> [European Commission College Agenda](#), October 2022



Should the current PEF methodology be the basis for future regulation of ecodesign requirements and substantiation of green claims - in particular those made for apparel and footwear - we are concerned that its use would omit the consideration of crucial product impacts that are the driving force behind the industry's huge environmental damage.

To make the PEF fit for purpose and ensure it helps deliver the EU's sustainability and circularity ambitions, three key indicators must be included: microplastic release, plastic waste, and circularity. Targeted strategies exist for each<sup>3</sup>, yet targeted indicators to measure and report progress for textiles are lacking. In other words, the EU cannot manage what it does not measure.

Clothing is one of the biggest contributors to microplastic pollution<sup>4</sup>; however, microplastic release is not currently measured in PEF. It should be reflected in the overall PEF score as a main indicator and given sufficient weighting against the other 16 indicators to have meaningful impact. The Commission has indicated that microplastic release might be included as "additional environmental information" in the PEF but fails to provide detail on how this information will reach consumers. Too much is known<sup>5</sup> about the scale of microplastic pollution and its environmental harm to prevent this information from influencing consumer purchasing choices.

A clearly defined plastic waste indicator should also be introduced, given the significant contribution of synthetic clothing to fast fashion<sup>6</sup> and plastic waste<sup>7</sup>. This is not a controversial idea – solid waste production is the least preferred option in the EU waste hierarchy<sup>8</sup>. The Commission claims that the life cycle environmental impacts of plastic waste are already accounted for in the PEF yet fails to elaborate on how it is measured or how a consumer can be informed of a garment's plastic waste impact upon purchase. Calculation of the PEF single score for a sweater going to landfill only increases the score by <1% if it is made from polyester, confirming the minimal weight given to this impact. If only minimal weight is given to plastic waste, it will not influence consumer choices, further fuelling growth of the fast fashion business model that relies so heavily on fossil fuel-derived materials.

Lastly, the inclusion of a circularity indicator is essential to delivering the EU's circular economy goals. Like plastic waste, the Commission claims that circularity is already addressed in the PEF, but its definition of circularity is narrow compared to indicators such as the Ellen MacArthur Foundation's Material Circularity Indicator<sup>9</sup>, under-weighting processes such as biological circularity and the importance of renewable inputs for sustainable product life cycles. To achieve the EU's laudable circular economy goals, inclusion of a circularity indicator must be prioritised and given sufficient weighting to send a strong market signal.

The evidence that the growth in cheap synthetic clothing is closely correlated to the growth of fast fashion is compelling. Omission of indicators linked to synthetic clothing, including microplastics, plastic waste and circularity will result in clothing made from fossil materials being shown as more sustainable, guiding well-intended consumers to buying more rather than less of the clothing primarily responsible for fast fashion.

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<sup>3</sup> [EU Microplastics Initiative; EU Strategy for Sustainable and Circular Textiles](#)

<sup>4</sup> [Primary Microplastics in the Oceans](#), 2017

<sup>5</sup> [European Environment Agency](#), November 2019

<sup>6</sup> [The environmental price of fast fashion](#), April 2020

<sup>7</sup> [Mapping clothing impacts in Europe](#), December 2017

<sup>8</sup> [EU Waste Directive](#), 2008

<sup>9</sup> [EMF Material Circularity Indicator](#)



We therefore urge you to ensure that the PEF, or any alternative tool, includes the necessary indicators to address the most critical environmental impacts of the fashion industry, and successfully deliver the EU's strategies. We are committed to working with the European Commission to be part of the solution in empowering consumers to make informed and sustainable choices.

Yours sincerely,

