To: Jessika Roswall, Commissioner for Environment, Water Resilience and Competitive Circular Economy
Eric Mamer, Director-General for Environment

Subject: Supporting MEPs' call for the inclusion of sustainably sourced renewable materials in Ecodesign for Textile Apparel (ESPR 2024/1781 – Delegated Act)

Date: 29 June 2026

Dear Commissioner Roswall,
Dear Director-General Mamer,

I am writing on behalf of Make the Label Count to express our support for the letter sent on 19 March 2026 by 15 MEPs in the European Parliament Sustainable Textiles Working Group.

We stand with these MEPs' call for the inclusion of sustainably sourced renewable materials in the Joint Research Centre's preparatory study to inform the development of the Delegated Act under ESPR.

Committed to renewable and high-performing fibre solutions, Make the Label Count (MTLC) is an international coalition of more than 80 natural fibre and material producers, manufacturers, brands and NGOs advocating for the environmental footprint methodologies developed by the European Commission to be fair, science-based and credible, ensuring that natural fibres and materials are not put at a disadvantage.

We support the EU's goal of building a more sustainable and circular textile economy. That is why we are concerned that in its current trajectory, EU textile policy will afford synthetic fibres an advantage founded on a narrow focus on specific indicators, such as recyclability or limited lifecycle metrics.

Recycled materials, including recycled natural fibres, have an important role to play in a circular textile economy. Recognizing how recycled content complements sustainably sourced renewable materials, can ensure that EU policy supports both responsible material circulation and responsible renewable material production.

The MEPs rightly highlight the significant shortcomings in current sustainability assessments. Recyclability cannot be treated as a proxy for sustainability, detached from the realities of collection systems, contamination, quality loss, energy use, pollution, and real-world end-of-life pathways.

We support the MEPs' call to promote the use of sustainably sourced renewable materials (SSRMs) in forthcoming ecodesign requirements, and welcome their draft definition of SSRM as materials that are "continually replenished at a rate equal to or greater than its rate of depletion, and deliver reduced impacts and increased benefits for climate, nature, people, and animals."

Further to this, we believe that a definition of SSRM that depends too heavily on certification—particularly less rigorous ones—or third-party verification could create practical challenges for many natural fibre and material producers. While traceability and credibility are of paramount importance, certified does not inherently mean sustainable.

Natural materials must be assessed fairly and in full. They should not be downgraded because the policy lens focuses too narrowly on a subset of input metrics or on incorrect assumptions. The specific sustainability attributes of natural materials must likewise be properly recognised in comparative analysis: renewable in origin, a different end-of-life profile compared to synthetics, and the capacity to support better soil management, water stewardship, biodiversity protection, and rural resilience.

Given this, policymakers could consider a criteria-based approach rather than a rigid material hierarchy. For example, this could include how materials are grown, how land is managed, how biodiversity is protected, how greenhouse gases are reduced, and how livelihoods are supported. The intent of this should not be to penalise natural materials for not meeting these criteria, but to recognise when they do.

Such an approach would also help ensure that policy incentives are directed towards the best-performing materials and production systems, based on transparent and scientifically robust criteria. The framework should encourage continuous environmental improvement within materials, recognising and rewarding higher standards of environmental stewardship, responsible production and regulatory compliance across value chains. This is particularly important given evidence from the JRC's Milestone 3 Preparatory Study indicating that production taking place under stringent regulatory conditions is often associated with stronger environmental performance outcomes.

Additionally, any discussion on sustainably sourced renewable materials should be accompanied by equivalent expectations around sourcing transparency for non-renewable fossil-based materials. Natural materials should not be required to demonstrate increasingly detailed and difficult to collect information about origin, production and land-based impacts while fossil-based synthetics are assessed mainly through narrower recycled-content or recyclability metrics. A more effective framework would ask comparable questions of all material systems, including where feedstocks come from, how they are sourced, and what impacts arise across production and end-of-life, while avoiding unintended incentives that could favour substitution choices not aligned with overall sustainability objectives.

At the same time, the relevance of SSRM goes beyond correcting an imbalance with synthetics. Many natural materials are connected to agricultural, pastoral, forestry or land-based systems. SSRM could therefore provide a way to connect textile policy with wider EU objectives on nature, climate, agriculture and the bioeconomy. Agricultural, pastoral and forestry-based material systems should not be viewed only through a risk lens; when supported by appropriate policy and incentives, they can be part of achieving Europe's climate, biodiversity, bioeconomy and rural development objectives.

Broader EU policy frameworks already point towards the need for a more effective and equitable comparative assessment across materials. In particular, the promotion of sustainably sourced renewable materials is fully aligned with the Council conclusions of 17 March 2026, which endorse

the EU Bioeconomy Strategy (2025) and explicitly call for measures to stimulate demand for bio-based materials.[1]

The MEPs also rightly underscore the important global economic and social benefits of fibre production. Natural fibres and materials play a central role in the global textile economy and in the livelihoods of farming and rural communities in many regions of the world. For example, some 24 million households globally depend on cotton for their livelihoods, according to the International Cotton Advisory Committee. Promoting SSRMs and natural fibres supports positive social outcomes by fostering rural development and strengthening the economic wellbeing of growers across producing countries, including in the Global South. This is closely aligned with the EU's broader development cooperation goal of poverty eradication. [2]

The EU has already set out the key principles; what remains is to ensure they are effectively reflected in the design and execution of textile policies. What we are asking for is a rigorous and non-discriminatory framework, one in which all materials are assessed against robust evidence, comparable criteria and real-world environmental outcomes.

Natural materials are part of the solution in achieving a more sustainable textile economy. Across natural material producing regions, producers are investing in improved agronomy, traceability, resource efficiency and lower-impact, nature-positive production methods. We believe policy should incentivise innovation in this direction, not a switch to synthetics.

Europe has an opportunity to lead by showing that sustainability policy is strongest when it is holistic, disciplined, and fair.

We would welcome the opportunity to meet and discuss in more detail with you the development of a definition for sustainably sourced renewable materials.

Yours sincerely,

Dalena White and Elke Hortmeyer
Make the Label Count Spokespersons

[1] Council of the European Union. (2026, March 17). *Bioeconomy: Council backs moving bio-based innovations from lab to production*. Bioeconomy: Council backs moving bio-based innovations from lab to production
[2] European Union. (2016). *Consolidated version of the Treaty on the Functioning of the European Union: Article 208 (development cooperation)*. Official Journal of the European Union, C 202, 141. https://eur-lex.europa.eu/eli/treaty/tfeu_2016/art_208/oj/eng