

Statement of the Confederation of the German Textile and Fashion Industry on the development process of the JRC study "Preparatory study on textile products" and the associated consultation processes

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The Confederation of the German Textile and Fashion Industry (Gesamtverband der deutschen Textil- und Modeindustrie e. V. – textil+mode) is the national umbrella association representing the interests of the German textile and fashion industry. The organization comprises 26 member associations, including 10 regional and 16 sub-sectoral trade associations. With around 1,400 companies and more than 120,000 employees in Germany, German textile and fashion is the country's second largest consumer goods industry. German textile and fashion companies generate an annual turnover of around 32 billion euros (60% textiles, 40% clothing and home textiles), making them the leaders in Europe. Textile companies are important suppliers for industries such as automotive, aerospace, medicine, geotechnology, etc. textil+mode represents the interests of the industry in the areas of economic and social policy as well as collective bargaining and education policy.

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textil+mode welcomes the European Commission's initiative to specifically promote sustainability in the textile sector. Environmentally friendly product design within the framework of the ecodesign regulation (ESPR) and the EU strategy for sustainable and circular textiles are intended to promote the transition to a more environmentally friendly industry. Global climate protection faces major challenges and requires innovative approaches to enable a successful transformation towards a circular economy – without losing sight of the competitiveness of European industry. The transition from a linear to a circular economy not only brings benefits for climate protection, but also essential aspects such as resource conservation, environmental protection and greater independence in supply chains.

We recognize the importance of introducing possible ecodesign requirements but have considerable concerns about the effectiveness of the measures examined. The EU's goal is climate neutrality by 2050, considering a **demonstrable CO₂ reduction**. In the measures examined to promote durability, reparability, reusability and recyclability, neither economic nor ecological interactions are sufficiently considered, nor are demonstrable CO₂ savings reviewed as a basis for the investigation.

Reducing textile waste and taking measures against fast and ultra-fashion are in line with the goals of the federation but require overarching and demonstrable objectives. The ESPR came into force in July 2024, as consumer textiles such as clothing, home textiles and shoes are included in the requirements to be prioritized under the legislation, various preparatory studies are now investigating various possible aspects of the ecodesign regulation for consumer textiles. As there are already various studies, workshops and developments in different member states on specific requirements and legislative initiatives, it is difficult for the affected industry (SME) to support this multitude of formats through technical expertise.

By examining the JRC **"Preparatory study on textile products"** closely and intensively we have identified key critical aspects that we would like to address in this statement, both regarding the study itself and the associated consultation processes.

1. Lack of transparency and involvement

The consultation process as part of the JRC study did not sufficiently ensure the active involvement of relevant industry stakeholders. Robust and effective policy development requires an open dialogue with all affected parties, including textile manufacturers, suppliers, retailers and consumer organizations, who are already involved in the design of preparatory measures. We call on the European Commission to increase transparency in the further course of the JRC study and to ensure that industry representatives are adequately involved in the development of the regulatory framework as well as in the preparatory measures. In addition, the consultations conducted are too complex and time-consuming. The questions are overloaded and fragmented, without an objective basis. The JRC lacks an overview of cooperation with other institutions or mandates to work on topics on member state level. In addition, studies are not only developed at European level, but also at national level – it remains unclear how these are integrated into each other and are used in legislation in later processes.

We demand:

- **More transparency** and faster evaluation of the consultation processes that have taken place, including disclosure of the comprehensible evaluation criteria for the consultation contributions.
- **Effective involvement of the industry concerned**, enabling early involvement of stakeholders from industry in the development of sub-studies right from early stages.
- **Harmonization of national and European research projects** in order to avoid contradictory results and reduce unnecessary regulatory hurdles.

2. Insufficient consideration of industry expertise

The JRC study has so far been primarily focused on theoretical and scientific assessments without taking adequate into account the technical feasibility and economic impact on the textile industry. However, practical industry knowledge is essential to define realistic and realizable ecodesign requirements. We therefore call for greater involvement of industry experts to ensure that the proposed measures are both technically feasible and economically viable. **The statements of the actual industry must be given more consideration than those of external stakeholders, who ultimately do not have any product responsibility.** In addition, the economic feasibility of the central questions of the study is not considered to any significant extent. The key questions are highly simplified and therefore lead to a specific result without providing a solid scientific and application-oriented basis. In view of the complexity of the subject, the JRC should have developed more differentiated and structured questions in close co-operation with industry. **Furthermore, some key questions are not formulated neutrally but rather guide the discussion in a specific direction – this undermines an objective, data-based analysis and should be critically questioned and corrected.** A generalized assessment of certain components within the study is not appropriate. Overall, the methodology and questions lack a comprehensive and structured approach that considers not only technical aspects but also economic and practical feasibility. The use of recycled materials for textiles is used here merely as an example but highlights comparable challenges in numerous other aspects of the study and also in the transfer of aspects to a possible ESPR, as there is no differentiated assessment of the feasibility of new requirements.

As an example, the following key questions on the use of recycled materials which were not sufficiently considered in the JRC study can be summarized:

- What and how to define recycled materials for textiles in principle?
- Are there demonstrable markets for the procurement of recycled materials for use in textiles? If this question can be answered with a positive answer, where do these markets occur and at what cost? Can developments in these markets be predicted? Is there a sufficiently substantiated data basis for evaluation?
- What is the actual demand for recycled materials compared to primary fibers?
- Can recycled materials be reliably detected in products?
- Are there any differentiations between various recycled materials or brand-specific recycled materials with different demand options?
- Which textile waste can be technically processed into recycled material for textiles?
- Is the fiber-to-fiber approach strictly necessary in the EU, focusing on economical scale or does it exclude reasonable other applications?
- Are recycled fibers produced in Europe at all competitive – and if so, in what quantities?
- What proportion of recycled fiber in textiles is technically feasible without compromising quality? What effects do recycled fibers have in the supply chain or in various production steps? On what data basis is this technical feasibility defined?

This example illustrates that the study does not constructively address key issues but rather relies on the unsubstantiated assumption that recycling is possible in the EU without any restrictions. This hypothesis was neither analyzed in a sufficiently neutral manner nor critically examined. Instead, scientifically substantiated development of knowledge, differentiated according to fiber types and technologies, would be necessary to precisely define the conditions under which recycled fibers can be best used. Another problem is the large number of studies that refer to each other but are too complex, inconsistent and not neutral. There is a lack of an overarching, structured view (zoom-out) and standardization with clearly researched, defined and verifiable objectives. This is particularly important in the context of the Clean Industrial Deal, which strives for an overarching and harmonized strategy for sustainable industries. Therefore, a stronger integration of the current consultations with this approach is urgently required.

Conclusion

The JRC study provides an important impetus for sustainability in the textile sector but has considerable methodological and substantive deficits. A lack of transparency, insufficient industry participation and unrealistic assumptions jeopardize practical implementation. Product conformity parameters may only be defined and developed with the stakeholders responsible for the product and owning the necessary practical expertise.

For valid eco-design requirements, we call for transparent consultation with clear evaluation criteria and early involvement of the industry. Technical and economic feasibility must be given greater consideration by developing realistic and neutral key questions as well as giving significantly greater weight to industry expertise. In addition, a sound analysis of the ecological and economic interactions is required, particularly regarding actual CO₂ savings and the marketability of recycled fibers. The study must be fundamentally revised to ensure fact-based, sustainable and economically viable regulation.