Making sustainable products the norm:
RREUSE reaction to Commission’s promising plans

The “New proposals to make sustainable products the norm and boost Europe’s resource independence”, stemming from the European Green Deal and presented by the European Commission today, contain a set of promising initiatives to save resources, advance the implementation of the waste hierarchy whilst taking into account social impacts. The package includes, among others, an Ecodesign for Sustainable Products Regulation and a communication on a new Sustainable and Circular Textiles Strategy, which was met with high anticipation from social enterprises active in the re-use, repair, and recycling sector. The goal of this policy package is to make products (including textiles, furniture, and electronics) more durable, reusable, and recyclable. Specifically, for textiles, the Commission intends to tackle fast fashion, textile waste and the destruction of unsold textiles, whilst also ensuring the production process is respectful of social rights.

Scope of ecodesign widened to non-energy related products

The European Commission proposes to implement new Eco-design requirements that would increase the durability, reusability, repairability, and recyclability of certain products. Textiles and electronics (including ICT products such as smartphones and tablets) are on the radar, with furniture potentially following suit. RREUSE supports this commitment and highlights the importance of product design in the achievement of these goals. This will help improve the quality of products and allow for a longer life-time, benefiting the first, the second, and potentially the third user.

Extending Extended Producer Responsibility (EPR) to Textiles
The strategy also includes the Commission’s intention to propose harmonised EU Extended Producer Responsibility rules specifically for textiles as part of the revision of the Waste Framework Directive in 2023. Even though the RREUSE network has reservations concerning the effectiveness of EPR to respect the waste hierarchy beyond recycling and safeguard the role of social enterprises (as expressed in this position paper), it is reassuring to see that the Commission suggests that a share of contributions made to EPR schemes be dedicated to preparing for reuse and waste prevention measures. However, the implication that the revision of the EU waste legislation will still include combined recycling and preparing for re-use targets raises questions and highlights that more steps need to be taken and separate targets need to be set for preparing for re-use of textiles.

**Support for social enterprise**

Regarding the support of social enterprises, both Commission initiatives recognise the importance of their presence in the sector and their value in creating green and inclusive businesses and jobs, but also acknowledge the obstacles that often prevent them from becoming mainstream players in all Member States.

They also highlight the need for further support of social enterprises.

The Commission wishes to explore the opportunities presented by the repair and re-use sector and aims to develop guidance on how to support partnerships for the circular economy between social enterprises and other actors, including mainstream businesses, a key initiative outlined in the EU’s Social Economy Action Plan, published earlier this year.

Other measures include the encouragement of Member States to introduce favourable taxation for the sector, and the promotion of circular business models, job creation in the textiles ecosystem, and creation of circular value through funding opportunities and other incentives.
Whilst these two commitments are very positive, RREUSE regrets the probable use of guidance and encouragements instead of concrete legislative measures to help maintain the role of social enterprises in the circular economy.

Mathieu Rama, Senior Policy officer at RREUSE, said: “Today's publications show a shift of behaviour from the Commission, now clearly committed to a more concrete implementation of the waste hierarchy and to linking the Circular and the Social Economy. However, the devil is in the details and the Commission will have to pay attention not to develop solutions that exclude consumers, re-use social enterprises and independent repairers!”.

Finally, the Commission’s proposals are a clear indication that steps are being taken in the right direction. However, the absence of consumption reduction targets echoes loudly and raises questions on whether the European Commission could have aimed even further.

Overall, RREUSE, after highly anticipating and preparing the release of both the Ecodesign for Sustainable Products Regulation and Sustainable and Circular Textiles Strategy, is pleased with their content and appreciates the value and importance of their publication for the sector.