RREUSE feedback on the consultation for New Product Priorities for Ecodesign for Sustainable Products

MAY 2023

RREUSE feedback on the consultation for New Product Priorities for Ecodesign for Sustainable Products

RREUSE welcomes the possibility to give feedback on new product priorities under the upcoming Ecodesign for Sustainable Products Regulation. As an organisation that promotes the reuse and repair of products, we believe that mandatory eco-design requirements can play a key role in reducing waste and minimizing the environmental impact of products throughout their life cycle, while also creating major savings for European households.

The recognition of furniture and textiles as the most important priorities for end-use products in the JRC study accompanying the consultation is particularly important for our sector as these are two categories of products with a high reusability potential that can be unlocked through ambitious eco-design legislation, resulting in a positive impact on the environment and significant opportunities for the creation of green and local jobs.

However, it is crucial that ICT products are not excluded from the list of priorities to avoid the risk of a big subset of products not being slipping through the cracks between the old working plan and the new one under the ESPR. This would be an enormous missed opportunity to advance regulation for a key value chain that is seeing a proliferation of completely unregulated products with very limited reparability and durability, which are responsible for negative environmental impacts across their whole lifecycle. Furthermore, the lack of regulation represents an important stumbling block for the future of the EU's strategic autonomy due to the inefficient resource management of the Critical Raw Materials contained in such products.

Therefore, RREUSE calls on the Commission to prioritise textiles, furniture and ICT products due to their high reusability potential and introduce ambitious mandatory requirements improving durability and reparability of these product categories, involving social enterprises in the consultation process due to their long-lasting expertise in the sector.

What follows is a short overview of why textiles and furniture should be prioritised among non-energy using products, with some suggestions on how durability and reparability for these two products group could be extended through specific requirements.

1.   Textiles

- ***Why do we need eco-design requirements for textile products?***

Textiles should indeed be identified as one of the highest priority product categories to be addressed in the ESPR because of the industry's considerable environmental and social impact. In 2019, 5.4 million tonnes of textiles were placed on the EU market and every year, EU consumers discard 5.8 million tonnes of textiles (i.e. 11 kg per person on average). This ever-growing consumption has major impacts on the environment: EU textiles consumption exerts the 4th highest pressure for the use of primary raw materials

and water of all value chains (the global textiles industry consumes 93 billion cubic meters of water every year[1]) and the 5th for emissions with 1,2 billion tonnes of GHG emitted every year[2].

In addition to the disastrous environmental impact of clothing production, the fast fashion business model produces unsustainable consumption patterns. Low-quality cheap textile products drive overconsumption as shorter-lasting products are discarded earlier, while also being unfit for re-use. Indeed, between 40 and 60 % of textiles are discarded because of low quality, failures in the garment itself, or functional changes (holes, worn-out appearance, stains, colour changing, pillage, colour fastness properties, tear strength, dimension stability, zipper quality...)[3].

Increasing products' durability is key to strengthening their environmental performance. Doubling the number of times that a garment is worn would decrease GHG emissions by circa 44% compared to producing a new item[4]. Likewise, extending the average life of clothing by nine months is estimated to generate a 25% annual reduction in the carbon footprint of garments across their whole lifecycle[5]. Therefore, eco-design requirements should be developed through the prism of re-use to ensure that textile products still hold value when reaching the second-hand market. However, at the moment, the legislation covering textile products' design focuses mostly on durability (50%) and recyclability (45%), whereas reusability (25%) and reparability (20%) are not sufficiently addressed[6].

- ***How to set eco-design requirements for textile products?***

Eco-design requirement should be set horizontally at fibre, yarn and fabric level. Here, textiles could be considered as intermediary products. If relevant, at a later stage, additional requirements could be set at product level. Building upon the best practices provided by the EU's Ecolabel, the Blue Angel, and the Nordic Swan, such an approach would help define the most environmentally performant fibres and materials. In addition, sportswear and leisure wear should be included in the scope of the Ecodesign for Sustainable Products Regulation.

A recent study showed that 23 million items of returned fashion were sent to landfill or incinerated in the UK in 2022[7]. It is therefore critical to swiftly implement horizontal requirement to ban the destruction of unsold goods. This ban should apply horizontally to all textiles products and be effective in all Member States.

In addition to eco-design requirements, information requirements should be set to improve products' durability and reduce overproduction. Brands should be required to disclose information on the production date (month and year) and on the number of garments produced in that series. Better transparency on production volumes is a prerequisite to driving more sustainable and circular business models.

---

[1] Earth Shot Prize (2021) The Ellen Macarthur Foundation: Designing waste and pollution out of fashion (Available here).
[2] European Environmental Agency (2022) Textiles and the Environment The role of design in Europe's circular economy (Available here).
[3] RREUSE (2022) RREUSE's Position Paper on the EU Textiles Strategy (Available here).
[4] WRAP (2013), Design for Longevity Guidance on increasing the active life of clothing (Available here)
[5] WRAP (2017) Valuing Our Clothes: The Cost of UK Fashion (Available here).
[6] ECOS (2021) Durable, repairable and mainstream How ecodesign can make our textiles circular (Available here).
[7] Institute of Positive Fashion (2023) Solving fashion's product returns (Available here).

2. Furniture

Almost a quarter of the world's furniture is manufactured in the EU and around 10 million tonnes are sold in the European market[8]. In the EU, 80-90 % of used furniture is destined to landfilling and incineration, while only 10 % is recycled[9]. To note that the lack of circularity in the sector directly impacts climate change as furniture emits methane when landfilled and CO_2 when incinerated, while also posing significant risks of chemical pollution if furniture is made from chemically-treated wood.

Reuse activities are mostly done by charity organisations, but still represent a very small fraction of all EoL scenarios, thus presenting a major opportunity for increasing circularity within the sector. Furthermore, a study by WRAP[10] on the re-use of sofas and dining tables in the UK showed that increasing re-use and preparation for re-use for these two product categories not only leads to significant environmental benefits by avoiding GHG emissions, but also results in net employment gains. This is especially the case if re-use activities are carried out by social enterprises and charity organisations, since the revenue from the sale of second-hand furniture is used to finance social programs.

Therefore, there is a lot of potential in upscaling re-use and preparation for re-use through mandatory eco-design requirements. A report by Eunomia commissioned by the EEB[11] and a study by the Nordic Council of Ministers[12] already provided some valid suggestions for potential eco-design requirements, including:

- A declaration by producers of expected lifetime under normal conditions and compliance with minimum durability requirements
- Specific provisions on the availability of spare parts at a reasonable price and for a reasonable time period
- Design for easy disassembly that can be carried out with unskilled labour and basic tools to facilitate repair, re-use and recycling
- A bill of materials providing detailed information on chemical composition, coupled with restrictions on the use of SVHCs to avoid legacy issues
- Information for consumers on maintenance, repair and disposal at end-of-life
- Mandatory EU-wide requirements on flame retardant label location, as an extremely simple and cost-effective solution to prevent re-usable furniture from not being legally sold due to consumers removing the label.

---

[8] European Commission (2014) The EU furniture market situation and a possible Furniture Products Initiative – final report (Available here).
[9] European Remanufacturing Network (2015) Remanufacturing Market Study. (Available here).
[10] WRAP (2011) Benefits of reuse case study: domestic furniture. (Available here).
[11] EEB (2017) Circular economy opportunities in the furniture sector. (Available here).
[12] Nordic Council of Ministers (2018) Potential ecodesign requirements for textiles and furniture. (Available here).

For more information, please contact:

Edoardo Bodo, Environment Policy Officer

www.rreuse.org