

A CALL TO ACTION

Sustainable Products Initiative



TEKSTILREVOLUTIONEN

Tekstilpolitisk tænketank

EXECUTIVE SUMMARY

The Sustainable Products Initiative (SPI) is a proposal for an EU directive to make products that are produced in or imported to the EU more sustainable. The idea is to introduce measures that ought to make products more durable, reuseable, recyclable, repairable and more energy-efficient. The EU Commission is gathering opinions from the public and stakeholders on the main policy options for the proposal that is planned to be adopted in the fourth quarter of 2021. We took part in the consultation and are emphasising which elements are crucial to look at if we want this proposal to succeed.

We welcome the initiative in so far as it results in legislation that actually makes a difference in terms of reduced resource extraction and decreased greenhouse gas emissions. The proposal stresses the need to produce products that last longer, which has a great impact in reducing our footprint. Indicating an expected lifespan on products is something we strongly believe in, and advocate for. Producing products that can be repaired plays into the durability aspect, as it creates an incentive for brands to produce clothes that are worth repairing. In addition thereto, the proposal suggests a so-called digital product passport that is supposed to contain information about the product and its impact. All these initiatives are interesting and have a huge potential to shift the industry and our mindset away from a take-make-use-dispose culture, to a more transparent, circular and sustainable one.

The precise wording, implementation and execution of this directive are crucial to its impact. Making information accessible and easy to understand is imperative, if the initiative is to succeed. If things are unclear and not worded in a way that actually incentivises brands to operate more sustainably, but allows them to circumvent this directive by using greenwashing-techniques, SPI will merely constitute another administrative burden. If enough stakeholders and representatives from the public sector, NGOs etc. will speak up and participate in the consultation, there is a greater chance of legislation that can save a lot of resources and decrease our negative impact on the world.

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BACKGROUND

The **Sustainable Products Initiative** (SPI) is a proposal for a directive by the European Union (EU) that currently is in public consultation. It is expected to be adopted by the EU Commission in the fourth quarter of 2021. The initiative is part of a more comprehensive strategy and thus, in order to understand what the SPI is actually about, it is necessary to zoom out and comprehend what the EU is aiming for and which other initiatives are in play.

In December 2019, the EU Commission adopted the **European Green Deal**, which is a growth strategy (not a piece of legislation) aiming at creating a modern economy with no net emissions of greenhouse gasses by 2050 and with economic growth being decoupled from resource use. This 'deal' is a framework or recommended mindset for policymakers. Along these lines, the **Circular Economy Action Plan** (CEAP) came into being in March 2020 as a core part for the Green Deal. While the Green Deal is relatively short (24 pages), CEAP is an initiative that introduces legislative and non-legislative measures to achieve a circular economy. Therefore, these documents are precursors to the directives that are going to change operations within business, society and the EU economy.

This is where the SPI comes into the picture - as part of a larger collection of proposals for directives that are being developed at the

moment. Other initiatives that should be mentioned are **Consumer policy – strengthening the role of consumers in the green transition** and **Environmental performance of products & businesses – substantiating claims**. The SPI is also a revision of the 2009 **Ecodesign Directive** which focused on energy-related products. As 'ecodesign' is supposed to become the norm, the intention with the SPI is to encompass the widest range of products possible.

The scope of this initiative is broad, as it encompasses a wide range of products and is also expected to affect the textile industry. While building on the SPI, the EU has also paved the way for industry-specific procedures and is drafting an **EU strategy for sustainable textiles** which is expected to be adopted in the fourth quarter of 2021. The strategy is partly developed to ensure that the textile industry recovers from the COVID-19 crisis in a sustainable way. We will also keep an eye on this proposal.

VOLUNTARY APPROACHES ARE NOT ENOUGH

It is evident that voluntary schemes, such as voluntary certifications, Global Compact, Science Based Targets initiative, Better Cotton initiative, etc do not go far enough to ensure a comprehensive and fundamental move towards the green transition in the textile

and apparel industry. Instead of these partial, divergent voluntary initiatives, we need guidelines and legislation that guarantee rudimentary and common principles to which we can adhere in the coming circular economy where all actors from designers and producers to waste managers will be interacting and interconnected on another level. Hopefully, the CEAP and the following initiatives will be a kickstarter to this new industry through legislation that holds imperative and harmonized principles. This is also why the EU Commission has proposed a law on due diligence, to improve checks-and-balances in respecting human rights along the supply chain. **Thus, the implementation of legislation is necessary to facilitate change in moving towards an industry with a reduced negative impact.**

INTRODUCTION

THE INITIATIVE

The Sustainable Product Initiative (SPI) aims at setting criteria for products on the EU market, with the objective to make them 'more sustainable'. It introduces a range of measures, focusing on designs that are durable, reusable, repairable, recyclable, and energy-efficient.

THE DEVIL IS IN THE DETAILS

The SPI directive has great potential. If done right - meaning by incentivising brands to focus on impactful areas, such as their business models, durability, and transparency - it could reduce the footprint of the textile industry immensely. However, there is a risk that the directive becomes just another administrative burden, with very little impact. The final wording, the implementation and execution

are crucial elements, which is why Tekstilrevolutionen took part in the consultation and forwarded its opinion on the SPI to the EU commission.

INITIATIVES THAT MATTER

An increasing focus on sustainability challenges consumers to identify the most significant efforts. Greenwashing has a significant role to play in delivering biased messages to the public about some products being more sustainable than others. **Initiatives that actually make a difference often remain undressed.**

SPI clearly has the potential to incentivise the development of circular business models, enhanced durability and more transparency - initiatives that matter more.

As part of the Sustainable product Initiative, the following measures are considered:

- establishing overarching product sustainability principles
- make producers more responsible for generating circularity - ultimately incentivising products as a service, providing repair service and ensuring spare parts availability
- make it mandatory to disclose products' sustainability performance to market actors along the value chain in the form of a digital product passport
- mandatory minimum sustainability requirements on public procurement of products
- requirements to address social aspects throughout the products lifecycle
- measures on production processes, such as facilitate recycled content or remanufacturing and track the use of hazardous substances
- measures to ban the destruction of unsold durable goods

THE HIERARCHY OF MEASURES

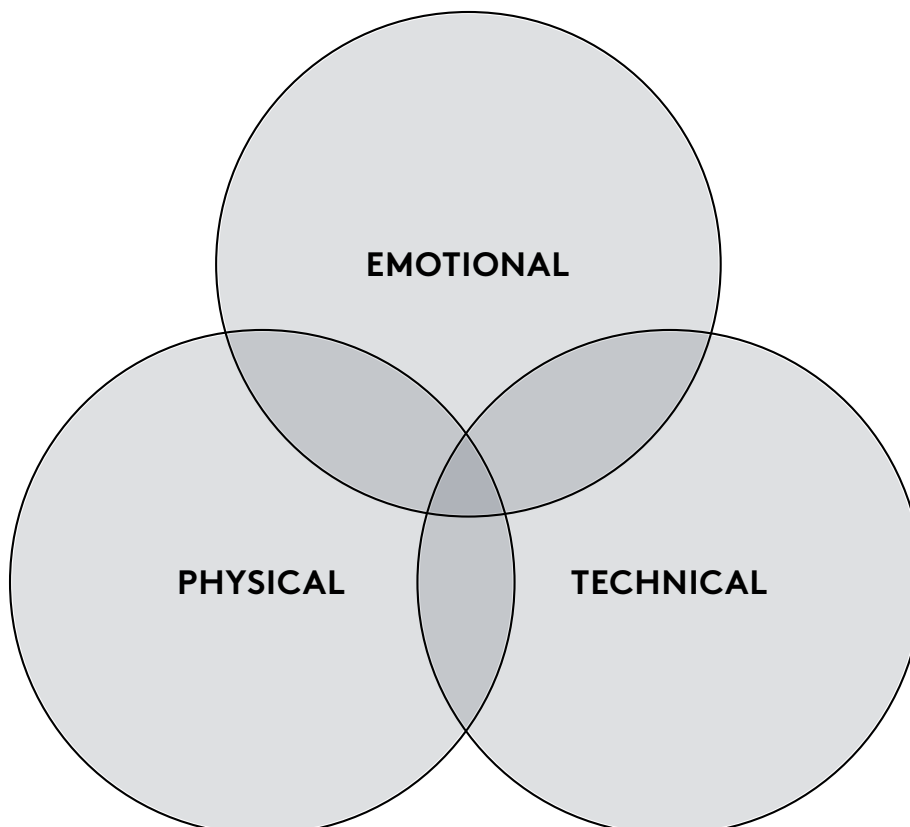
SPI suggests that rules should be made for producers and importers to improve the durability, reusability, repairability and upgradeability. In that order. Following this hierarchy is crucial, as some aspects are more resource efficient than others and thus the effort made to realise these should be prioritised accordingly. In fact, **the most resource effective is to keep the product as intact as possible for as long as possible. This means making it more durable** (see also our [impact guide](#)).

Setting requirements for the durability of products should form part of Extended Producer Responsibility (EPR), which incentivises companies to create products that last longer.

3 different types of durability

There are several ways to make clothes more durable. But first, it is useful to understand that there are different kinds of durability.

- **Physical durability** has to do with how intact a garment is, meaning how easily a garment rips, gets holes etc.
- **Technical durability** deals with a garments' performance, meaning how well it e.g. keeps its shape. A loose elastic band e.g. can determine this.
- **Emotional durability** has to do with how long a piece of clothing is loved. When it ceases to be loved - because it doesn't fit in terms of size or style - it stops being used.



DURABILITY

Durability is one of the most impactful elements to focus on. A significant amount of the products we buy – clothing included – are not made to last. Requiring producers to make more durable products would have a huge impact as it postpones the purchase of a new piece of clothing, and thereby saves a lot of resources that would otherwise be used to produce a new garment.

Today, most clothes are only used for a fraction of their lifespan. We are buying more than ever and using our clothes for a shorter period of time. The environmental impact a garment has when considering its use phase is therefore incredibly high. However, if we focused on keeping clothes in the loop through reuse then doubling the lifespan of a garment would result in reducing the climate impact by nearly 50%.¹

Having established that extending the lifetime of a piece of clothing is massively reducing the environmental impact per time used, this is what can be done:

Repair as first remedy

As part of the fast fashion model, which underpins our throw-away culture, it is often easier and cheaper to buy a new garment instead of repairing it. But repairs do not require nearly

as many resources as providing a brand-new product. To facilitate repairs as a first remedy, products need not only to be durable but also designed so that they can be repaired more easily. This could be done by introducing a so-called modular design where parts or areas that are particularly exposed to wear and tear, can be upgraded or repaired.

State information on expected lifespan

In order for consumers to be able to make decisions based on the product's lifespan, we need to disclose information about e.g. the reparability and recyclability of a product. Making the expected lifespan public, could, in the long run, have the potential to make durable products more competitive on the market and thus incentivise brands to focus more on creating products that last longer.

Measuring an expected lifespan can be done by conducting durability tests, like e.g. dimensional changes, colour fastness to washing and light, wet rubbing, dry rubbing, pilling, etc. And while some brands already conduct these tests - also because it often forms part of certificate requirements - a set of criterias must be developed which all companies can use to measure and report lifespan fairly. Equally crucial is the need to establish how, for example, brands in a measurable way can prove that they are making genuine efforts to extend the

¹ Roos, Larsson & Jönsson (RISE), [Supply chain guidelines: vision and ecodesign action list](#), *Mistra Future Fashion*, no. june 2019, p. 11

lifespan of the products.

However, this particular element requires vigilance, as the precise wording will decide whether the directive merely becomes a tedious administrative burden on businesses, or whether it will actually change operations for the better.

DIGITAL PRODUCT PASSPORT

The SPI introduces the idea of a so-called Digital Product Passport (DPP). According to the [Green Deal](#), this passport “could provide information on a product’s origin, composition, repair and dismantling possibilities, and end of life handling”². It is aimed at addressing the lack of information and transparency in global supply chains, which are especially scarce in the globally fragmented textile industry. The DPP is intended to enable ‘track and trace’ information on product specifications in order to both enable a strong data driven economy as well as facilitate circularity.

We are aligned with the European Environmental Bureau (EEB)³ in that the DPP should include information on:

- Materials - Bill of materials
- Chemicals - Bill of substances
- Circularity performance - Durability, reparability, reusability, recycled content,

recyclability including presence of hazardous chemicals and maintenance

- Environmental and climate footprint - for instance water impact and greenhouse gas emissions
- Due diligence certificates - As a part of the [due diligence legislature](#) proving fair, social and ethical behaviour

Collecting this information would be useful for each actor along the supply chain, as they could get better access and insight into product specifications and thereby be able to manage their own production more smoothly. This would also be advantageous for the post-consumer stage when products are to be recirculated. Also, authorities would be able to monitor the content and qualities of the products thus making it easier to enforce restrictions, for instance related to harmful substances. Lastly, the DPP is aimed to provide details about the products that will enable critical consumers to base their purchases on far more informed choices.

Now, the success of the initiative is dependent on the implementation: is this going to be a neglected platform, where information is presented in a technical, incomprehensible form, making it unattractive and confusing to the consumer? Or will this be a tool that is easily

² European Commission. *The European Green Deal*. COM(2019) 640 Final; European Commission: Brussels, Belgium, 2019.

³ European Environmental Bureau, [Discussion paper: sustainable product policy initiative](#), 2019

accessible and user-friendly? Does it allow every consumer to access credible information directly to their smartphone, when shopping? What type of information will be presented? Will it be one platform - or will consumers need to download an app for each brand they buy from? And will it be integrated to include second-hand clothes as well?

All of these things are up in the air and have yet to be decided - but it will determine how successful the initiative proves to be.

A valuable source for detecting greenwashing?

Introducing a DPP can make a difference if the information it provides - on a garment - is understandable and easily accessible to the public. If done right, it might, in the long

run, function as a catalyst for changing consumer behaviour, as it will expose consumers to more reliable information and thus make it easier to compare different products fairly. This can also prove a valuable source for NGOs and non-profit organisations, as they can spot brands that actually provide false information in their communication.

However, it is necessary to clarify which group the information in the DPP is targeted to - is it the industry (suppliers, producers, brands), consumers and/or actors working with reuse, recycling or waste management?

Rethinking business models

We need to move away from fast fashion business models. **The SPI has the potential to facilitate this transition, as it requires**

What are sustainable products?

Products are not sustainable. Something is sustainable when it can sustain itself. It is therefore a word one can use when talking about systems. Systems can be sustainable and thus “be able to support themselves” indefinitely. To talk about actors or products inside the system as sustainable, makes little sense. That would imply that they were completely isolated and had no impact on the rest of the world at all. Likewise, these actors, and to this end the processes they contribute to the system, cannot be “more sustainable” than any other alternative. They can, however, have a large or small impact on different aspects of the system. This could for example be through GHG emissions, use of land or water.

companies to actually investigate and get to know their supply chain better.

Providing information on harmful substances is an integrated practice, but looking into aspects of durability, recyclability and repairability would force producers to open up and rethink their way of producing textiles. The rules would also require them to prove that the design of their products respects the recyclability hierarchy. This could be a catalyst for facilitating more transparent and sustainable business practices.

THE PROCEDURE

You have until the 9th of June to fill in the survey. After that, the feedback is reviewed by the EU Commission, which formulates the final directive and adopts it by the end of this year.

CALL TO ACTION

It is crucial to make sure that this initiative lives up to its potential and will not merely be an administrative burden. Let's push for this legislation to have a positive impact on the way products are made and used. Whether you represent a business, NGO, consumer or another actor, you can voice your opinions through the survey by the EU Commission (access and read the survey [here](#)).

Legislators:

Make sure that this directive will not be filled with empty words and that its implementation makes it easy for the consumer to make better decisions. In an everyday life scenario, a few clicks can be a sufficient barrier for not using the collected information.

Industry Leaders:

If you are not already working on advancing sustainability, you have to do so. This initiative is on its way and will be accompanied by more. Specifically, you need to think about how to create a business model that is not following the make-use-waste model and focus on durability and transparency.

If you are not already fully aware of everything going on in your supply chain, make an effort to find out.

Consumers:

Spend 20 seconds extra when making decisions. Reflect on the reasons why you want to buy a product. Ask more questions about the clothes you are about to buy, such as How long will the product last? Do they offer repair services? Where were the different components made? Can they be substituted?

Designers:

Rethink your way of designing products, if durability is not your first priority. Follow the hierarchy of measures and make sure to have the following factors in mind: how can I design a piece of clothing that can be repairable, reusable and/or recyclable? Keep in mind that the order of these measures is important and that it is better to just focus on one criteria, like durability, which is higher on the list than on several criteria that have a lower priority. It

ABOUT TÆNKETANKEN TEKSTILREVOLUTIONEN

Tekstilrevolutionen is an independent think tank working towards a textile industry in which production and consumption has a positive impact on the world and its inhabitants.

We believe in inspiration, information and co-creation are the tools that will bring us there. We want to develop an environment where scientists, scholars, brands, consumers, politicians and authorities are collaborating to find, cultivate and realize the best solutions.

We collect data, come up with ideas and pinpoint barriers and possibilities connected to the green transition that the industry is bound to undergo. To brands, we assist in reaching their green potentials; to politicians, we provide industry knowledge and push for progressive legislation; to customers, we share knowledge and develop tools which can guide towards informed decisions and cognizant consumer behaviour.

We want a nourishing textile industry where stock prices can grow, revenue streams flow, and business life can take centre stage, yet it cannot be on the expense of flourishing ecosystems where trees endure, rivers are pure, and all people can earn a living wage.

Contact us

[www. tekstilrevolutionen.dk](http://www.tekstilrevolutionen.dk)

Maarie Josephine Mustelin

Mail: marie@tekstilrevolutionen.dk

Markus Hatting

Mail: markus@tekstilrevolutionen.dk