



# OPINION

European Economic and Social Committee

## Textile strategy

Communication from the Commission to the European Parliament, the Council, the European  
Economic and Social Committee and the Committee of the Regions

EU Strategy for Sustainable and Circular Textiles

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**CCMI/188**

Rapporteur: **Florian MARIN**

Co-rapporteur: **Antonello PEZZINI**

[www.eesc.europa.eu](http://www.eesc.europa.eu)

**EN**

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Outcome of vote (for/against/abstentions)	202/0/2

## 1. **Conclusions and recommendations**

- 1.1 The textile industry has the potential to contribute to the EU's environmental goals, and must become accountable for its environmental impact. The right balance must be struck between the end-of-life costs for textile producers and the competitiveness of the industry.
- 1.2 In order to embrace the circular and digital transition, the textile ecosystem needs appropriate and flexible measures that address its particular characteristics. Creativity and sustainable innovation must be an integral part of the Textile Strategy.
- 1.3 The Committee supports the extensive labelling requirements relating to the recycling degree and footprint of textile products as a possible incentive for consumers to choose sustainable products and quality over quantity, but this requires a thorough impact assessment and a large-scale information campaign at European level.
- 1.4 The EESC is concerned about unfair competition practices, and requests increased market surveillance of imported products and better coordination and cooperation between national enforcement authorities. The Committee calls for measures to ensure equilibrium between the actors in textile supply chains and recommends the launch of global sustainability best practices, in full compliance with CEN, CENELEC, and ETSI technical standards, while also stressing the right to health and environmental protection.
- 1.5 The Committee deems it necessary to strengthen existing and future trade agreements, and introduce sustainability and human rights protection paragraphs within the Generalised Scheme of Preferences for developing countries.
- 1.6 The Committee had expected more emphasis on social aspects in the sector, as the green transition must go hand in hand with the just transition. Further initiatives should be prepared related to social dialogue and collective bargaining.
- 1.7 The Committee points to the need for investments and programmes to consolidate the capacity of inspection institutions and the operational capacity of the social partners for monitoring global agreements, fundamental and workers' rights. Smart use of cohesion funds must contribute to reducing disparities between Member States and regions.
- 1.8 The EESC considers that supplementary assistance should be delivered to Member States in terms of cross-border cooperation, market surveillance, effective control and harmonised standards, and it calls for a supranational monitoring process.
- 1.9 The Committee supports obligatory due diligence for all EU companies, with specific support for SME compliance, and calls for strict measures that prohibit economic relations with entities that use child labour or fail to respect decent working conditions, as specified in the ILO core conventions.
- 1.10 The EU funds invested in the sector should include social and environmental criteria for project financing, and the EESC calls for a dedicated EU initiative for improving social security,

working conditions, health and safety at work and wages in the textile sector, with the involvement of the social partners, both within and outside the EU.

- 1.11 The transition to new ecodesign-based sustainable business models requires effective policies that deal with materials and design, production and distribution, market development, use and re-use, collection and recycling. It must be complemented by increased financing opportunities and incentives for local producers to shift production processes towards high-quality, durable, and recyclable products.
- 1.12 The future Extended Producer Responsibility (EPR) scheme should encourage fibre-to-fibre textile recycling instead of false circularity processes, and must be accompanied by the creation of sufficient collection points in all regions of all Member States, including in rural areas.
- 1.13 The EESC calls for national campaigns that promote textile sector labour opportunities, as well as financing programmes for upskilling and reskilling the labour force, together with the implementation of vocational training and apprenticeships programmes.
- 1.14 The Committee calls for sector-specific and harmonised social and environmental rules for public procurement in the Union. A European tripartite committee should be established, including the social partners and civil society organisations, for monitoring and supporting the social or environmental criteria in purchasing practices in the textile sector.

## **2. Competitiveness aspects**

- 2.1 The EESC notes the ambitions set out within the Commission Communication<sup>1</sup>, but considers that this Communication is just a statement of necessary steps and future legislative actions, commitments and delegated acts, rather than concrete actions that will selectively target and achieve these goals for the textile sector. The Committee would have been ready to engage in more detailed discussion and was eagerly expecting this, but appreciates the introduction of textiles into the discussion and considers that the 16 announced future legislative initiatives should be coherent, realistic and enforceable.
- 2.2 The textile ecosystem is an extremely composite one, with particular characteristics for each component that require appropriate and adaptive measures. In order to ensure an appropriate circular and digital sustainable transition, these specificities must be addressed with adequate graduality and not through a "one-size-fits-all" approach. The war in Ukraine and energy price increases are adding a burden to the sector's productivity and performance.
- 2.3 The rapid increase of online shopping has created a competitiveness issue for textile companies and the industry is struggling, especially against large platforms. Special attention must be given to companies which are operating in several Member States and third countries. The EESC considers that regulation of digital markets and supranational monitoring are needed and supplementary assistance should be delivered to the Member States in terms of cross-border cooperation, market surveillance, effective control and harmonised standards.

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<sup>1</sup> [EU strategy for sustainable and circular textiles.](#)

- 2.4 Purchasing policy, the relation between brands and different subcontractors, high volumes and low prices are factors which contribute to human and labour rights violations. The huge influence of brands at the supply chain level is a factor that can undermine manufacturers' efforts to respect labour and human rights and environmental conditionalities. The EESC calls for measures to assure equilibrium between the actors in supply chains. Furthermore, the Committee strongly recommends that the EU textile strategy and all future related actions take due account of the particularities of SMEs in an appropriate manner and that all measures be preceded and accompanied by a specific impact analysis.
- 2.5 The EESC is concerned about unfair competition practices and requests increased market surveillance of imported products, especially in relation to end products coming from third countries and entering the single market. Better coordination and cooperation between national enforcement authorities is necessary to provide consumers with safe and compliant products.
- 2.6 The EESC points out that ecodesign requirements for the textile sector must take into consideration the durability, recyclability, repairability, and reusability of the products, together with chemical use restrictions, as well as social rights, far beyond the "classical" aspects of design engineering. The EESC notes the need to find a balance between the end-of-life costs that will occur for textile producers and the competitiveness of the industry.
- 2.7 Free trade agreements can contribute to promoting decent work, fair supply chains and social dialogue at sectorial level. The Committee considers it an immediate necessity to strengthen the trade and sustainable development chapters within existing and future trade agreements, and introduce sustainability and human rights protection paragraphs within the Generalised Scheme of Preferences for developing countries. Ex-ante and ex-post human rights and environmental impact assessments should be used in the negotiation process, with the involvement of the social partners and civil society, and should cover a large period of time within the company.
- 2.8 Social economy enterprises and NGOs should and must be involved and supported and can bring an important contribution to achieving the environmental goals for the textile ecosystem. Based on the weight of plastic used for producing clothes, the EESC considers that the EU should consider imposing a tax on virgin synthetic fibres, in order to reduce the use of virgin plastic. Moreover, repairing, waste collection, selection and recycling processes should take into account industrial spacing, regional and geo-policy targets, and rural development.

### 3. **Sustainability, circularity and green transition**

- 3.1 The EESC would like to emphasise that, whatever the future developments of the transition pathway to a more resilient, sustainable and digital textiles ecosystem, the extension of products' lifetimes offers greater benefits than recycling. The Committee also notes the need to create a real EU market for secondary raw materials, and considers that the EU can become a world-wide leader in secondary textile materials if recycling requirements are respected. A contribution can be achieved through the European Circular Economy Stakeholder Platform<sup>2</sup>.

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<sup>2</sup> [European Circular Economy Stakeholder Platform](#).

- 3.2 The EESC is in favour of the obligation for increased traceability and transparency regarding the number of products that large companies discard and destroy. Furthermore, the Committee asks the co-legislators to support the empowering of the Commission to introduce bans on the destruction of unsold textile products and encourage, where necessary, the donation of textile products to disadvantaged groups or entities engaged in charitable actions.
- 3.3 Microplastics pollution caused by the current design of textiles has a significant impact on the environment. The EESC supports the Commission's conclusion that this is mainly caused by current production processes, especially the "fast fashion" phenomenon.
- 3.4 The EESC points out that companies need financial support to adopt automated sorting technologies for non-rewearable textiles, as well as the development of improved recycling facilities, including the possibility of designing local and regional recycling and sorting hubs. Furthermore, building infrastructure for repairing clothes, such as stores and shops, must represent a key issue for stakeholders in the industry. In this regard, the Committee salutes the EURATEX initiative to create five ReHubs (textile recycling hubs) near the European textile and clothing districts for collecting, sorting, processing and recycling industrial, pre-consumer and post-consumer textile waste. The Committee considers that technical, environmental, social and energy standards for recycled products are needed, and should be transposed and applied at ISO level and inserted in the international trade agreements.
- 3.5 The EESC is worried that textile waste can be exported as second-hand products and considers that immediate action on this is needed at EU level. Effective chemical controls must be implemented across all value chains. Furthermore, the EESC calls for the launch of global sustainability best practices that require buyers and brand owners to check and demand compliance with CEN, CENELEC, and ETSI technical standards.
- 3.6 The Committee considers that sector-specific and harmonised social and environmental rules for public procurement must be developed in the Union, facilitating cross-border participation and a level playing field with the final goal of having mandatory and harmonised systems across the EU. A European tripartite committee should be established, including the social partners and civil society organisations, for monitoring and supporting the social and environmental criteria in purchasing practices in the textile sector.

#### 4. **Consumers and digitalisation**

- 4.1 The EESC asks the European Commission to prepare an impact assessment on possible improvements to the labelling for textiles produced/sold in the internal market. Fair access to information for consumers concerning a repair score, traceability and information on the digital label must be ensured. The Committee considers that introducing extensive labelling requirements regarding the recycling degree and footprint of textile products could represent an important incentive for consumers to choose more sustainable textile products.
- 4.2 The EESC believes that a large-scale information campaign at European level can help citizens to make informed sustainable choices, while incentives should be provided for consumers to

choose quality over quantity, for example through different VAT rates for sustainable/unsustainable products in the internal market.

- 4.3 Transparent and common shared data regarding products, recycled and re-used compounds, destruction of goods, chemicals used in the production process, the social and labour impact of the production process and the environmental impact concerning every company in the supply chain are important for the monitoring of these supply chains. Furthermore, creating an open data framework and ensuring free access for consumers, civil society and the social partners is crucial for improving the textile sector's environmental and social situation. The EESC considers that consumers' digital literacy must be taken into account and the data content should target all the stakeholders in the supply chain. The right balance must be struck between the need for transparent data and the protection of industrial property rights.
- 4.4 The EESC is worried that less than 1% of textiles worldwide are recycled into new textiles<sup>3</sup>, and considers that the future EPR scheme should produce the right incentives that encourage fibre-to-fibre textile recycling instead of false circularity processes like the use of polyester from recycled plastic bottles for example.

## 5. **Education and working conditions**

- 5.1 The Committee points out that more detail could have been given on social aspects within the textile sector and more initiatives would have been welcomed. The green transition must go hand in hand with the just transition, and the Committee is disappointed that further initiatives related to social dialogue and collective bargaining have not been announced.
- 5.2 A fair redistribution of added value within supply chains and more responsible products implies the consolidation of collective bargaining, reducing atypical forms of employment and proper controls on working conditions. Together with the transformation of the sector towards sustainable production and digital technologies, there is an acute need for skilled workers. Compared to previous years, the needs of the sector are moving towards medium and highly skilled employees.
- 5.3 The sector is facing a serious ageing problem and jobs in textiles are not considered attractive by the young generation. Most of the workers in the sector are women, and this creates more social pressure on the ecosystem. Special attention needs to be paid to rural aspects, small farmers and their role in global supply chains. The Committee calls for specific campaigns in all Member States that promote textile sector labour opportunities, as well as financing programmes for upskilling and reskilling for the existing labour force, together with the implementation of vocational training and apprenticeships programmes in all Member States in order to create high quality textile jobs. Financial institutions should include social conditionalities in their performance standards as a contractual condition for financing.
- 5.4 Violations of labour rights and working conditions (precarious work, poverty wages, lack of health and safety at the workplace, forced labour) continue to be a problem, while different

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<sup>3</sup> [European Commission – Strategy for textiles.](#)

voluntary initiatives (social audits, global agreements, codes of conduct) have proven insufficient. The EESC advocates building up and consolidating the capacity of inspection institutions, the coherence and convergence of inspection methods and criteria, training for inspectors and cooperation with the social partners and civil society both within and outside the EU. Investments in increasing the operational capacity of the social partners for monitoring global agreements, fundamental rights and workers' rights are of paramount importance. Smart use of cohesion funds is needed to contribute to reducing disparities between Member States and regions in the EU.

- 5.5 In the context of very complex and fragmented value chains, the pathway towards sustainability and social justice requires complementary approaches. Asymmetric power relations and unfair competition practices have paved the way for the exploitation of workers and a production model decoupled from environmental boundaries. The EESC considers that a complaint mechanism at European level and in each Member State with the involvement of organised civil society is necessary for ensuring proper implementation of the strategy, and for respecting human and workers' rights and environmental conditionalities, in order to avoid the humiliating exploitation of workers.
- 5.6 The EESC appreciates the recent release of the proposal for a Corporate Sustainability Due Diligence Directive<sup>4</sup>, considers that obligatory due diligence for all EU companies is needed with specific support for SME compliance, and calls for strict measures that prohibit economic relations with entities that use child labour or fail to respect decent working conditions, as specified in the ILO core conventions. Furthermore, the Committee notes the existing restrictions in some countries regarding trade union activities, and consider that these have led to industrial accidents, harsh and inhumane working conditions, subsistence wages, lack of basic protective equipment, etc.
- 5.7 Freedom of association, the right to form or join a union and engaging in collective bargaining should not represent barriers for textile workers. The EU funds invested in the textile sector at EU level should include social and environmental criteria for project financing inserted in the evaluation grid. Due to the specificity of the textile sector, the EESC calls for a dedicated EU initiative for improving social security, working conditions, health and safety at work and wages dedicated strictly to the textile industry, with the involvement of the social partners, both within and outside the EU.

## 6. **Funding and investments**

- 6.1 The Committee believes that consolidating competitiveness and reducing the carbon footprint of the European textile sector is dependent on an integrated and interrelated product policy accompanied by stronger regulation, market instruments and incentives, new standards and appropriate information for consumers, manufacturers and other stakeholders. The carbon border adjustment mechanism can reduce the risk of carbon leakage and ensure that the price of imports takes full account of the environmental footprint.

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<sup>4</sup> [Proposal for a Directive on Corporate Sustainability Due Diligence and its annex.](#)



- 6.2 The transition to new sustainable business models requires effective policies that deal with materials and design, production and distribution, market development, use and re-use, collection and recycling, and must be accompanied by increased financing opportunities and incentives for local producers to shift the production processes, research and implement new technologies, adopt sustainable waste management policies and make use of the large amount of data available, alongside promoting cultural creativity. The EESC recognises the role of creative textile sectors in generating innovative solutions that positively impact other sectors and help boost European competitiveness.
- 6.3 The climate commitments must be applied at supply chain level, as the brands are not the owner of the factories in which the products are being made. Incentives should also be awarded to companies which are climate neutral and use 100% renewable energy. Making full use of the dedicated funds under NextGenerationEU can contribute to ensuring strategic investments, economic growth, and the creation of prosperity and employment, especially for SMEs.
- 6.4 The industry needs a common European framework and financial support to produce high-quality, durable, and recyclable products. This can be done with strong investment in R&D and large-scale European programmes that fund and support collaboration between large companies and SMEs, with the direct involvement of the social partners, academia and other stakeholders.
- 6.5 The introduction of the Extended Producer Responsibility scheme (EPR) must be accompanied by the creation of sufficient collection points in all regions of all Member States, available in rural areas as well. The EESC requests specific measures dedicated to SMEs for increasing the capacity to deliver traceability and transparency at supply chain level and for ensuring a proper connection with manufacturers, paying particular attention to micro and small enterprises.

Brussels, 14 July 2022.

Christa Schweng

The president of the European Economic and Social Committee

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