



The Danish Government's comments on the Roadmap for an EU strategy for textiles

The Danish Government appreciates the opportunity to comment on the Commission's roadmap for an EU strategy for textiles.

The Danish Government strongly supports the Commission's decision to launch a common European strategy for textiles, as well as achieving a green transition. A more sustainable textile industry requires a common and coordinated effort.

The Danish Government advocates for an ambitious textile strategy that contributes positively to environmental, climate and health outcomes, whilst considering the current covid-19 crisis. The Danish Government supports the outlined scope of the textile strategy, as presented in the roadmap. Thus, we would encourage the Commission to consider additional content in the final strategy within five prioritised areas, which we consider to be in line with the roadmap:

1. Increased focus on prolonging product lifetime via design and ecolabels
2. Minimise harmful chemicals and plant protection products
3. Less waste – more and higher quality recycling. Establishing a market for recycling and secondary raw materials
4. Use of business models and public procurement to promote the transition to a circular economy
5. Combating micro plastics, biodiversity loss and climate change

1. Increased focus on prolonging product lifetime via design and ecolabels

Based on the knowledge that the design phase of products is a deciding factor for products' environmental impact and durability, Denmark calls for a coherent product policy that supports circular design of products with increased focus on resource efficiency and prolonged product lifetime. This requires an increased focus on quality, durability, reparability, re-usability, recyclability and substitution of chemicals of concern in regards to design practices.

With an increased focus on more sustainable design, avoiding the overconsumption of goods is central, and should therefore be included in the EU strategy for textiles. Furthermore, the strategy should discourage overproduction, as this causes an unnecessary use of resources. An opportunity to achieve this is focusing on innovation that reduces by-products and waste in production and increase the opportunity for production-on-demand.

To inspire to more sustainable design, encouragement for more traceability throughout the value chain should be included in the textile strategy. This would also be a first step to minimise green washing.

More sustainable product design practices could be achieved e.g. by innovations and digitalisation. Both factors are important in regards to accelerating the green transition and should therefore be a strong focus area of the coming strategy.

Moreover, Denmark supports the widening of the eco-design directive to the widest range of products possible, including textiles as part of the Sustainable Products Initiative, to set minimum requirements and thereby removing the worst performing products from the market.

Denmark finds that in order to ensure transparency and coherency - a common underlying methodology is required for the various instruments assessed in the Impact Assessment Study for the Sustainable Product Initiative (SPI), as well as the Sustainable Product Policy Framework (SPPF), including the three legislative initiatives, as a whole. The Product Environmental Footprint (PEF) developed by the Commission is an important instrument that should serve this purpose. Furthermore, it is essential that the common underlying method is based on a common knowledge base, with updated and validated data of high quality. The EU Ecolabel and national Type I ecolabels has proven useful for companies promoting their products and substantiating green claims. The ecolabels include environmental and quality criteria, as well as “how to use” information (wearing and washing).

2. Minimise chemicals and plant protection products

The Danish Government supports the aim to address challenges regarding the widespread and diverse use and presence of substances of concern in textiles. Thus, the strong connection to the Chemicals Strategy for Sustainability and the Circular Economy Action Plan is essential. The Danish Government supports the aim to propose actions to promote more sustainable production processes (including for raw materials used for textile production) and tackling the presence of chemicals of concern throughout the entire life cycle of textiles and in recycled raw materials for textile production. In addition, the Danish Government supports the use of green diplomacy from the EU to globally phase out the use of the most harmful substances in textiles and use of pesticide active substances not authorized in the EU. The diplomatic work should also focus on enhancing the flow of information on most harmful chemicals throughout the supply chains.

It is worth highlighting the importance of including the effects that chemicals and plant protection products in the production, distribution, use and disposal of textiles might have on health, including occupational health, biodiversity and the environment, including waterways, groundwater and water quality. This would contribute to underlining the need to reduce negative effects on human health and the environment stemming from the use of chemicals of concern throughout the entire lifecycle of textiles.

The importance of product safety for consumers should be emphasised. This includes avoiding substances of concern in products, as well as ensuring that consumers have easy access to information on the chemical content throughout the product lifecycle.

3. Less waste – more and higher quality recycling. Establishing a market for recycling and secondary raw materials

The Danish Government supports the focus on extended producer responsibility schemes in promoting a more sustainable textile and treatment of textile waste in accordance with the waste hierarchy. The requirement in Directive (EU) 2018/851

for separate collection of textile waste from 1st of January 2025 in EU member states, will already be implemented in Denmark by January 2022, as part of the Government's strategy for a green waste sector and Circular Economy from June 2020. This will create a push for new business models and technology development in recycling. Furthermore, this will contribute to the transition to a circular economy and EU's goal of a climate neutrality.

The Danish Government supports the proposal to make the textile ecosystem fit for the circular economy for instance by improving textile waste collection and recycling in the member states. The Danish Government encourages the Commission to focus on less textile waste throughout the whole value chain, reuse, repair, refurbishment and recycling possibilities, in regards to design, business models and especially technological development.

The Danish Government supports using targets to improve reuse and recycling efforts, as well as promoting green public procurement. The planned engagement of a broad range of stakeholders in forming the objectives is of great importance in order to develop and implement the solutions successfully.

The Danish Government stresses the importance of developing technological solutions for textile recycling. This can increase the options for textile recycling and be a way to address the expected increase of textile waste following the entry into force of the requirement of collecting textile waste in 2025. Solutions for higher traceability (including of chemicals of concern) in regards to textile waste, especially exports hereof, should be part of the new textile strategy.

4. Use of business models and public procurement promote circular economy

The Danish Government stresses the importance of exploiting the potential in circular business models in the aim of reaching a sustainable textile industry. Circular business models can help companies to extract significantly more value from textile products by prolonging the lifetime of products. The higher value extraction can imply a good business case besides the environmental and climate related benefits of the lower need for raw materials. Therefore, the Danish Government supports the proposal of actions to underpin business models that e.g. sell textile products as services, buy back and resale of used products, second hand stores, renting of products, and stores for repair and refurbishment of textiles. In this regard, it is important to note that data and digitalisation can enable the circular business models - also in the textile industry. Data on the condition and damage of textile products after use or intelligent price setting on second hand- or rental of textile products are examples of how data and digitalisation can enable circular business.

Moreover, it is important to gain further insights and improve the available data on the consumer's use of textiles and clothes during its lifetime to promote sustainable usage and contribute to the development of sustainable business models.

The Danish government supports proposing minimum mandatory Green Public Procurement (GPP) criteria and targets, including for textiles. The Commission

should ensure a better and more systematic monitoring of member states' use of GPP criteria, common definitions and the different tools. The Danish government suggests that PEF or ecolabel criteria should be used to provide the basic environmental profile for a product or service.

5. Combating micro plastics, biodiversity loss and climate change

The Danish Government supports the Commission's focus on tackling the climate crisis and limiting the release of micro plastics. Additionally, the global biodiversity and habitats of animals and insects should be considered as a central topic in relation to the production of textiles. Agriculture, resources extraction, micro plastics, climate change and the release of chemicals play a central part in shrinking local habitats, but also globally. We encourage the Commission to present concrete actions to address these issues.

The Danish Government welcomes the cost-benefit analysis of policy measures reducing unintentional release of micro plastics but would suggest an extension of the analysis to include an ecological profile (e.g. by using PEF) and taking into account the user pattern. Natural fibres (e.g. cotton, wool etc.) and synthetic fibres (e.g. PET, polyamide etc.) typically have different applications not necessarily interchangeable one-to-one, and the Danish Government would thus urge the Commission to take into consideration the specific challenges related to release of micro plastic from synthetic fibres.

The Danish Government suggests that the strategy highlight the potential contribution towards achieving climate neutrality in the EU by 2050.

Please do not hesitate to contact the Danish Ministry of Environment for further explanation of the above points.

We look forward to participating actively in the implementation of the Commission's work towards an EU textile strategy.