

EU ECOLABEL AND GPP TEXTILES

BEUC and EEB comments on the criteria proposal December 2014

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EU Ecolabel and GPP comments form – Textiles

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No.	Comment from	Contact person	Reference: - document - section/task - page	Subject of the comment	Comment
1	BEUC/EEB	Blandine Cupidon Jens Soth	General comment		<p>BEUC and EEB believe that GPP is an excellent instrument to promote a more resource-efficient economy by valorising environmental friendly goods and services. Public authorities have significant purchasing power that can foster the expansion of the green market and incite companies to innovate and minimize their environmental impact. They have also the potential to increase knowledge about the chemical content of textiles, and ensure adequate information sharing across supply chains. We believe GPP has a strong potential in addition to the EU Ecolabel for the following reasons:</p> <ul style="list-style-type: none"> - The two-level criteria approach based on core and comprehensive criteria is very well embedded and contributes to the ambition level raising among the tenderers. - Stringent and ambitious GPP criteria have the power to foster green innovation and lead to jobs creation. The expansion of the green sector is one serious solution to the high unemployment rate in the

					<p>European Union (EU). Setting high requirements is a way to boost companies to raise their environmental performance.</p> <p>To give a concrete example, GPP structure could allow to get the textiles back, for instance to collect staff uniforms in many sectors (military, hospitals) in order to limit the amount of waste.</p> <p>Finally, we believe there is room for improvement and more ambitious criteria as textiles are not subject to fast changes.</p>
2	BEUC/EEB	Blandine Cupidon Jens Soth	2.1.2 Fibre sourcing Cotton fibres	Supported with modification	<p>BEUC and EEB believe that the proposed minimum content of cotton coming from Integrated Pest Management (IPM) or organic culture are not stringent enough.</p> <p>We strongly call for a requirement of 60% IPM or organic cotton as the core criteria and 100% organic cotton as the comprehensive criteria.</p> <p>We would like to forestall the argument concerning the assumed insufficient volume of organic cotton.</p> <p>Since 2005, organic cotton has gained a lot of visibility and accessibility: the amount of organic cotton produced has been multiplied by 5 between 2005 and 2012. We would like to stress that in 2013/2014, 109826 metric tons of organic cotton have been produced and this would be sufficient for producing approximately 315 million T-shirts. We are assuming that there is practically a lot of volume space for applicants until the approximately 109'000 tons might be reached.¹</p>

¹ Textile Exchange, Farm & Fiber Report 2014.

					<p>Therefore integrating organic cotton into a product supply chain should not be difficult for textile companies.</p> <p>On top of this there are huge organic cotton schemes that do not supply to the organic cotton market right now (e.g. in Tanzania, Benin, Colombia, Kyrgyzstan) because clear market signals are missing. The formulation of stringent GPP criteria could bring a little more planning certainty into the market.</p> <p>Moreover a most recent Life Cycle Assessment (LCA) study proves clearly the environmental benefits of organic cotton over conventional cotton. The long awaited scientific evidence to substantiate a call for organic cotton within criteria documents is therewith substantiated. Indeed, this study demonstrates that the organic cotton production has the following potential impact savings compared to the conventional one:</p> <ul style="list-style-type: none"> - "46% reduced global warming - 70% reduced acidification potential - 26% reduced eutrophication potential (soil erosion) - 91% reduced blue water consumption - 62% reduced primary energy demand (non-renewable)"² <p>It is now widely recognized that the organic cotton cultivation needs less water and energy use.</p> <p>Furthermore GPP textiles have longer development cycles as compared to fashion items and clearly predictable volumes and qualities. Thus tenderers will not run into a shortcoming of available organic cotton, if the timespan for responding to the call and its corresponding delivery times is within usual ranges.</p> <p>We support the exclusion of genetically modified cotton.</p>
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² The Life-cycle assessment of organic cotton fiber – A global average. Summary of findings, Textile Exchange, November 2014, http://farmhub.textileexchange.org/upload/library/Farm%20reports/LCA_of_Organic_Cotton%20Fiber-Summary_of%20Findings.pdf.

3	BEUC/EEB	Blandine Cupidon Jens Soth	2.1.2 Fibre sourcing Wool fibres	Rejected, modification suggested	<p>Even though we recognize that organic wool may not be easily available on the market, we recommend the JRC to introduce a requirement on the use of wool pesticides. We suggest to align with the Nordic Swan wording:</p> <p>"The total content of the following substances must not exceed 0.5 ppm: γ-hexachlorocyclohexane (lindane), α-hexachlorocyclohexane, β-hexachlorocyclohexane, δ-hexachlorocyclohexane, aldrin, dieldrin, endrin, p,p'-DDT and p,p'-DDD, cypermethrin, deltamethrin, fenvalerate, cyhalothrin and flumethrin.</p> <p>The total content of the following substances must not exceed 2 ppm: diazinon, propetamphos, chlorfenvinphos, dichlorfenthion, chlorpyrifos, fenclorophos, diflubenzuron and triflumuron."</p>
4	BEUC/EEB	Blandine Cupidon Jens Soth	2.1.2 Fibre sourcing Man-made cellulose fibres (Viscose, modal, lyocell)		<p>1. We welcome the criterion on the legal and sustainable sourcing of wood pulp. However, we call for a deeper harmonization of the certification schemes among European countries for the sake of clearer and easier application processes for tenderers. The Forestry Stewardship Council (FSC) and the Programme for the Endorsement of Forestry Certification (PEFC) schemes have been identified by Belgium, Denmark, Germany, UK and the Netherlands as the most reliable schemes in Europe which provides a high level of assurance. FSC and FEPC should be therefore commonly used as a basis for timber policies in Europe in order to harmonize the GPP criteria among european countries.</p> <p>We suggest JRC to evaluate the feasibility of chlorine free bleaching.</p>

					<p>2. Halogenated emissions to water from pulp production</p> <p>BEUC and EEB recommend relating the AOX content to the pulp but not to the fibre. We propose to lower the total amount of chlorine and organically bound chlorine in the finished fibres down to 100 ppm.</p>
5	BEUC/EEB	Blandine Cupidon Jens Soth	<p>2.1.2 Fibre sourcing</p> <p>Polyester and Polyamide fibres</p>		<p>EEB and BEUC call on the JRC to check for the availability of antimony-free PE. Since GPP textiles have longer cycles and are less subjected to fashion trends, applicants for a GPP call should have chances to link with suppliers for antimony-free PE. We strongly recommend lowering the level of antimony in the standard.</p> <p>On the percentage of the recycled content in synthetic fibres, BEUC and EEB will present here a qualified position. From a consumer point of view, recycling textiles that date back to years are not the safest option. The underlying reason is that very few information is available on chemicals present in textiles and there is no proof that the amount of chemicals in textiles comply with the criteria on hazardous substances. Even if recycling contributes to reducing the environmental burden of products, it makes no sense from a safety and human health perspective to recycle dubious chemicals. It is also worth to stress that hazardous substances are very likely to be released in the environment during the recycling process. From this point of view, recycling textiles would mean perpetuating toxic substances into new products.</p> <p>However, environmental NGO's consider recycling as a strong signal sent to tenderers in order to lower the amount of waste and to tend toward a more resource-efficiency economy. Recycling is one of the main environmental hotspot of a textile life-cycle. It would be therefore relevant to set stringent criteria on the recyclable content in synthetic</p>

					fibres to ensure a high recyclability potential.
6	BEUC/EEB	Blandine Cupidon Tatiana Santos	2.1.2. Chemicals restriction		Please see our comments on chemicals in the Annex document attached.
7	BEUC/EEB	Blandine Cupidon Jens Soth	2.1.2. Chemicals restriction Restrictions on the use of substances to be verified by production sites	Explanations requested	In this criterion, the JRC focuses more on the final product testing to measure the presence of hazardous substances, rather than on the restriction of hazardous substances (formaldehyde, phthalates, APEO's) at an earlier production stage. However, the EU Ecolabel approach puts more emphasis on the substitution of hazardous chemicals in production formula at the earliest stage. We therefore call the JRC for further explanation on why they adopt a different approach for GPP. We would strongly recommend the JRC to adopt the approach of textile producers group ZDHS who focus on chemicals at the source. ³

³ Please see <http://www.roadmaptozero.com/>.

8	BEUC/EEB	Blandine Cupidon Tatiana Santos	2.1.2. Chemicals restriction Flame retardants	Rejected	<p>The EEB and BEUC strongly recommend that products that are impregnated with hazardous flame retardants to meet fire safety standards are not awarded the EU Ecolabel, as they should not be labelled as green products of environmental excellence. Fire safety is needed but hazardous substances that may affect human health and the environment should be avoided in EU Ecolabel products, and in particular considering that safer alternatives (please see the document attached) to meet fire safety requirements are available. In this respect, EEB and BEUC recommend the introduction of a wording similar to the Blue Angel requirements for textiles requiring that:</p> <p><i>The flame-retarding effect should preferably be achieved by use of flame-resistant fibres or by means of the fabric structure.</i></p> <p>This specification could accompany the derogation conditions for flame retardants, so that the manufacturer should justify that for the specific application under consideration these alternatives are not available.</p>
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