



PEF CONSULTATION - OVERVIEW

The European Commission currently offers another period of public consultation and this time on the EU Product Environmental Footprint Category Rules (PEFCR). As communicated before, a scientific and evidence-based approach to methodology is lacking in the current process. Without correction, fossil fuel-based textiles will be advantaged above those made of natural fibres.

This part of the consultation process can be challenging, and we offer a step-by-step guide on how to access it. We also offer a DRAFT response, particularly aimed at textiles made from animal fibres.

A garment's footprint size is significantly influenced by the number of times it will be worn. Evidence from peer-reviewed consumer surveys confirm that animal fibre-based products do have long serviceable lifetimes. At least four factors contribute to this:

1. Highly valued – owners want to make use of their high-value clothing for a long time and typically take good care of them
2. Washed less often - due to the inherent odour resistance and wrinkle resistance properties of animal fibres, enabling them to retain their 'as new' appearance longer and consequently be worn more often between washes
3. Garments are sufficiently durable for a long life – and this is largely because of their high elasticity. When put under pressure, they stretch rather than break, and then recover and return to their original shape
4. Recycled more often - surveys of donations to charities confirm animal fibre-based garments (i.e. silk, cashmere, wool, etc.) are donated at a higher rate than garments made from less expensive fibre types, giving them the likelihood of second and even third lives

However, none of these attributes are currently considered in the proposed PEFCR methodology. Instead, tensile-related durability tests are primarily used to determine the duration of service of clothing. As you may be aware, animal fibre types typically have low tensile properties, and the thresholds that have been chosen for clothing with a long duration of service (i.e. 'aspirational' service) will be unattainable by all but the heaviest fabric animal fibre products.

The 'multiplier system' proposed for improving the PEF score of high strength clothing lacks evidence and has the clear risk of generating perverse outcomes by suggesting physical durability is the only factor influencing how long garments are worn, despite evidence to the contrary.

In its current form, the proposed PEF methodology does little to discourage the scourge of cheap, fast-fashion and synthetic textiles which are contaminating our land and water in both macro- and micro-plastic form.

This consultation is open until 24 September and we encourage you to raise your concerns. Please contact Emma or Emily in cc if you need further assistance with the process.

International Wool Textile Organisation aisbl

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President: Wolfgang Edmayr

Secretary General: Dalena White

MAKE THE LABEL COUNT CAMPAIGN

We now have a landing page ready for the *Make the Label Count* website and plan to launch the campaign on 12 October in Brussels. We are investing in a strong social and digital campaign to target content at EU policy makers. Access the page here: www.makethelabelcount.org

To help amplify this, we'd like to request MOU members **consider supporting with contributions** towards sponsored media content in Politico, a leading political policy title with over 1.5 million readers monthly and highly regarded in Brussels amongst EU policy makers. The total cost of the sponsorship opportunity is €40,000, so any support you may be able to contribute towards this would be greatly appreciated. Please contact me for more information.

We call on all members of the Natural Fibre Coalition to submit their own information and requests, to enable legislators to make the most informed decisions in future textile labelling processes.

With Kind Regards,

Dalena White

Secretary General

IWTO

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