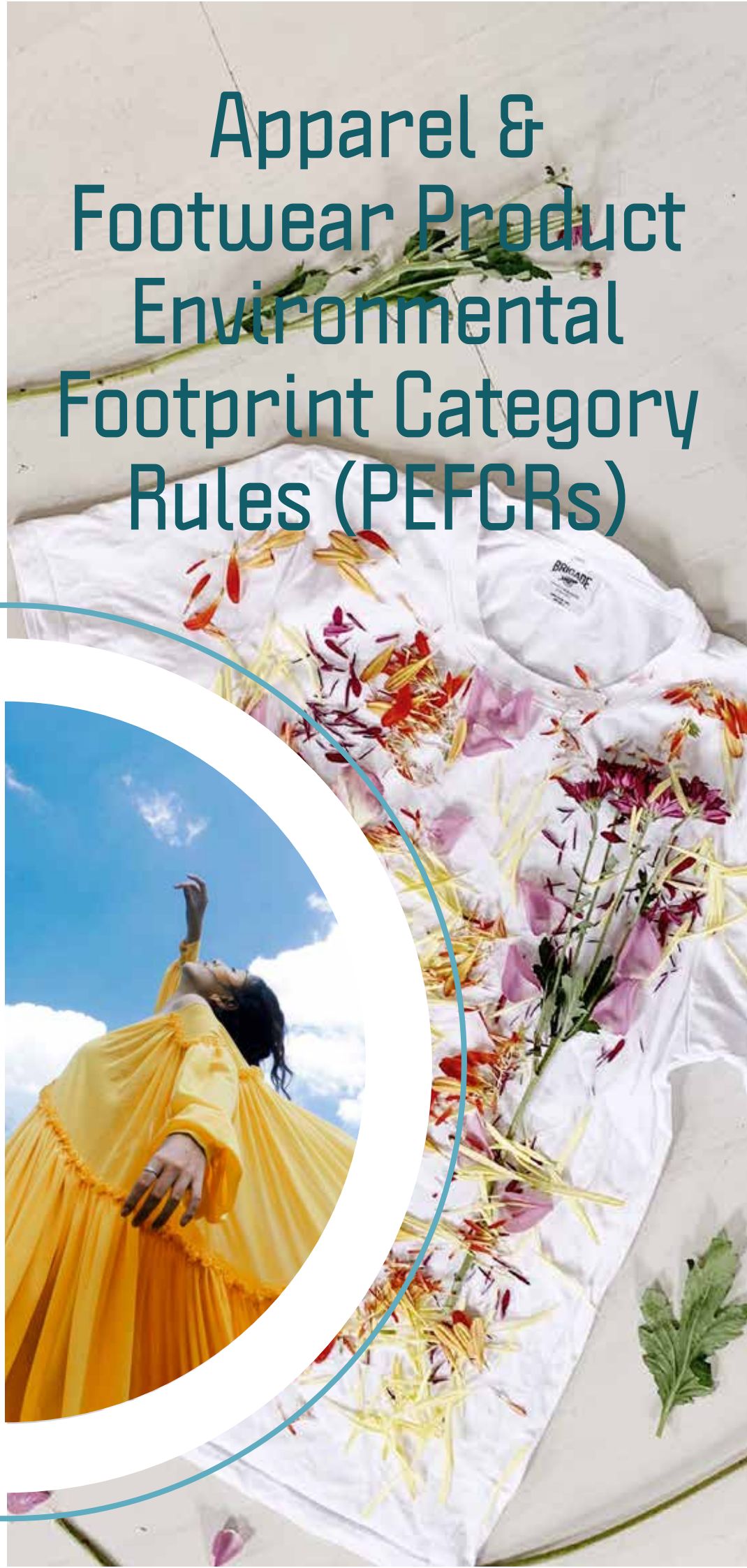




Apparel & Footwear Product Environmental Footprint Category Rules (PEFCRs)



*EURATEX agrees with the **need for a harmonized method** to evaluate the environmental impact and welcomes the European Commission's vision to develop such a method.*

*It is important to ensure that in times of economic crisis and uncertainties companies will be able to use the **PEF as an asset** for their competitiveness, and that the PEF would not be a new burden. Companies shall be entitled to decide whether to make environmental claims, hence the use of the PEF shall be voluntary.*

EURATEX identifies several elements necessary to implement the full potential of the Product Environmental Footprint methodology, as well as to break down the complexity of the term sustainability into individual, understandable and well-defined building blocks.

*For the industry to recognize and support the method, EURATEX **calls for improvements.***



The **Product Environmental Footprint (PEF)** is an EU official method developed based on LCA (Life Cycle Assessment) criteria; in 2010, the European Commission proposed PEF as the system to measure environmental performances. The objective was to establish a common methodological approach which enables assessment and benchmark of the environmental performance of products based on comprehensive assessment of environmental impacts. Between 2013 and 2016, the so called **Product Environmental Footprint Category Rules (PEFCRs) were developed with the aim to generate robust and reliable information on environmental impacts.** Since 2019, this single set of rules is being developed for Apparel and Footwear products.

EURATEX, representing the European Textile and Clothing Industry and as non-voting member of the PEFCR Technical Secretariat, which is developing Apparel & Footwear PEFCRs, supports the goal of the European Commission 2020 Circular Economy Plan to substantiate environmental claims using the Product Environmental Footprint (PEF) method along with the new sustainable product framework.

EURATEX agrees with the need for a harmonized method to evaluate the environmental impact of textiles consumer goods and welcomes the European Commission's vision to develop such a method. However, in times of economic crisis and uncertainties, it is important to ensure that, companies shall find in the PEF method an asset for their competitiveness, and not a new burden.

As it currently stands, brands would benefit the most from the PEF method, whereas detailed information on the production processes would be used. or an accurate and consistent use of the PEF. In this

case, the producers would carry most of the burden by installing measurement and data acquisition devices to be able to acquire the data required by current PEFCRs, thus incurring in additional expenses, especially heavy for SMEs.

The development of the PEF method is a long and complex process, especially for apparel and footwear products, which have different functionalities and production processes. Currently, the method has a rather theoretical approach; it considers all garment and footwear products available on the EU market, calculates averages and makes up a benchmark based on “average product”. The average product is a theoretical product, with no reference to an actual product in the market. It remains a major bottleneck to compare and assess the impact of real products, considering the complexity of the products available, the wide variety of processes involved, the number of stakeholders involved, the global spread of the supply chain (with all barriers concerning languages and willingness to provide data) and variety of clothing items (including a potential range of colors, prints and sizes). Furthermore, in the fashion industry, the time the products are on the market (for sale) is relatively short as they are fast moving consumer goods.

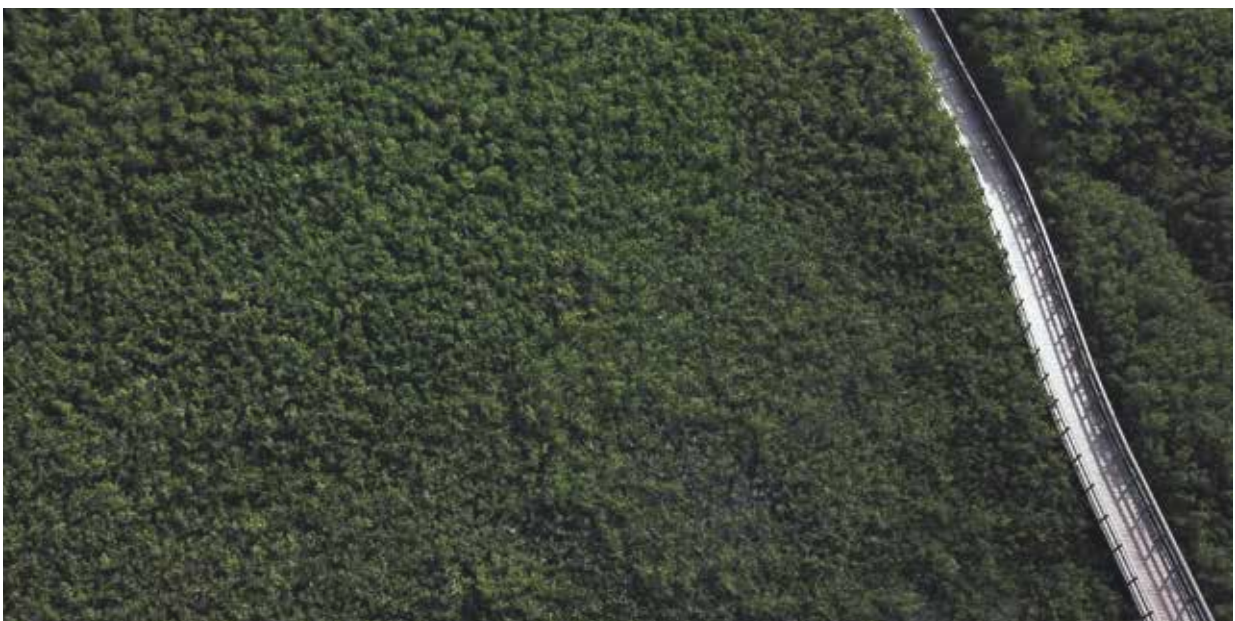
To make the use of PEFCR proportional for every actor in the supply chain, the European Commission should consider a modular approach in which every actor can contribute with its own information instead of using calculation made by one sole actor. Making it modular, the system would become more efficient by giving decision-makers in the supply chain the option to compare building blocks and choose the most effective option.

Many companies already use LCAs to evaluate the environmental impacts of products. PEFCRs need to realistically take into consideration the capabilities and constraints of smaller players (SMEs, niche sectors and product groups) and of the upstream industries. This needs to be considered so that such players would not be penalized, for instance by the lack of tools available to them. The development of a simple and easy-to-use tool based on the PEF environmental database would be a solution to tackle this problem and thus compare the footprint of products. In doing so, the reporting on the environmental impact could as well be standardized.

EURATEX has identified several **key elements necessary to implement and recognize the full potential of the Product Environmental Footprint methodology**, as well as to break down the complexity of the term “sustainability” into distinct, understandable and clear building blocks:

- **Optionality.** Making environmental claims using PEF should remain voluntary.
- **Accessibility.** The process to develop a sector specific PEF needs to be fully transparent and easily accessible to all key value/supply chain actors, no matter the size.
- **Level playing field.** Legislation fostering PEF must ensure a level playing field, avoiding the proliferation of different methods in order to improve comparability and avoid unfair comparisons among materials/products.
- **Robustness.** For robust environmental claim, the use of PEF needs to rely on high quality and verified data. This is a continuous process to update and enlarge the database of materials, processes and products, and to avoid misleading results.

- **Usability.** SMEs shall be able to process the necessary data without extra burdens (expensive and inaccessible secondary data) and without having to overly depend on (non-EU) datasets owners.
- **Verification.** Sufficient transition period must be guaranteed, taking into account the impact on SMEs, for the purpose to verify the intended goal of PEF.
- **Scientific.** PEF needs to be scientifically sound and provide for a regular/periodic scientific and independent review.
- **Flexible.** The PEFCRs development process shall be open to new industries and product groups. The development timeline shall be flexible, with a continuously open call for applications and a more adaptable schedule.



Methodological limitations need to be acknowledged and resolved

Elements such as the impact of biodegradability or the release of microfibres are not part of the current PEF methodology. They are to some extent covered by other impact categories (e.g. climate change, land use, eutrophication or acidification). These impact categories, that are currently not within the PEF scope, should be included as mandatory environmental footprint impact categories as soon as scientifically proven methods are available, avoiding overlapping with other EU provisions. At the same time, the selected impact parameters shall not bias the use of certain fibers. In addition, scientific studies shall be promoted to investigate issues, as the release of microfibers, and to identify appropriate characterization factors on the PEF category, such as for example “freshwater ecotoxicity”.

Furthermore, the PEFCRs need to explicitly solve uncertainties on a number of key issues and parameters, such as number of product uses and quality of secondary data. Underlying data must be plausible for the analyzed product and must also be usable in order not to draw any misleading conclusions. Data needs to be peer reviewed to ensure robustness and quality in order to reflect the reality.

EURATEX recommends making sure all relevant environmental impact categories are captured within the PEF methodology. We **ask for a commitment or action plan to address and improve key data issues**, especially their constant update and quality improvement and request involvement of the industry in co-creation and verification of these data.

Reliable information is a must

When it comes to interpretation of the results and communication to different audiences, specifically to consumers, PEF score must deliver meaningful information. Environmental footprint information shall be communicated in a meaningful way, while avoiding misleading consumers with over-simplifications. **The communication format should be reasonably flexible.** It is not recommended to only provide a very simplified and seemingly clear PEF message, like traffic lights or A-B-C-D-E performance classes, due to the complicated nature of apparel products (functionality, specific properties, upstream variety) and above-mentioned uncertainties (e.g. data quality). **EURATEX** recommends B2B communication on cradle to gate only in order to provide useful information to the consumer.

The actual use of a product is very subjective and depends on personal needs, as well as geographical conditions and is beyond the influence of the retail companies placing products on the EU market. **EURATEX** suggests either adding key facts on better use, care, etc. as additional information than trying to “model them into a number” which doesn’t give the consumer a good guideline on how to use and consume more sustainably. In addition, the current model to calculate the impact of product’ use stage gathers all products within a subcategory, without any differentiation on fiber or function (e.g. basic cotton t-shirt, long sleeve wool shirt or high function sport t-shirt).

The PEF method shall solve (and not allow) greenwashing

The PEF is an essential step forward for EU harmonized LCA calculation, which currently still has some methodological shortcomings. Existing limitations can cause misleading results and information can lead to incorrect purchase decisions and wrong environmental strategies. The European Commission is preparing different policy measures, such as Ecodesign requirements for textiles (ESPR), mandatory green criteria for public procurement, EU Ecolabel scheme and measures to substantiate green claims. The PEF is visioned to support setting these policies, to improve comparability and prevent from greenwashing. However, EURATEX is concerned that the current single PEF score method is not able to make enough distinction and fulfill the requirements set in other EU policy measures.

To be effective and **fit for purpose, the PEFCRs must be regularly reviewed and updated** in line with the unfair commercial practices directive, where companies are obliged to underpin the benefits of their products with adequate evidence. Therefore, the European Commission should not exclusively adopt the green claims system based on PEF, the uncertainties on the underlying PEF rules shall be first addressed.

The PEF can be recognized and supported by the industry if it matches with the improvements marked in this paper.



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As the voice of the European textile and clothing industry, EURATEX works to achieve a favourable environment within the European Union for design, development, manufacture and marketing of textile and clothing products.

The EU-27 textile and clothing industry, with around 160,000 companies employing 1.5 million workers, is an essential pillar of the local economy across many EU regions. With over € 62 billion of exports, the industry is a global player successfully commercializing high added value products on growing markets around the world.

Working together with EU institutions and other European and international stakeholders, EURATEX focuses on clear priorities: an ambitious industrial policy, effective research, innovation and skills development, free and fair trade, and sustainable supply chains.