



EEB

European
Environmental
Bureau

LEGAL AND POLICY DEVELOPMENTS IN ACCESS TO ENVIRONMENT-RELATED PRODUCT INFORMATION

Chemicals in textiles – a case study

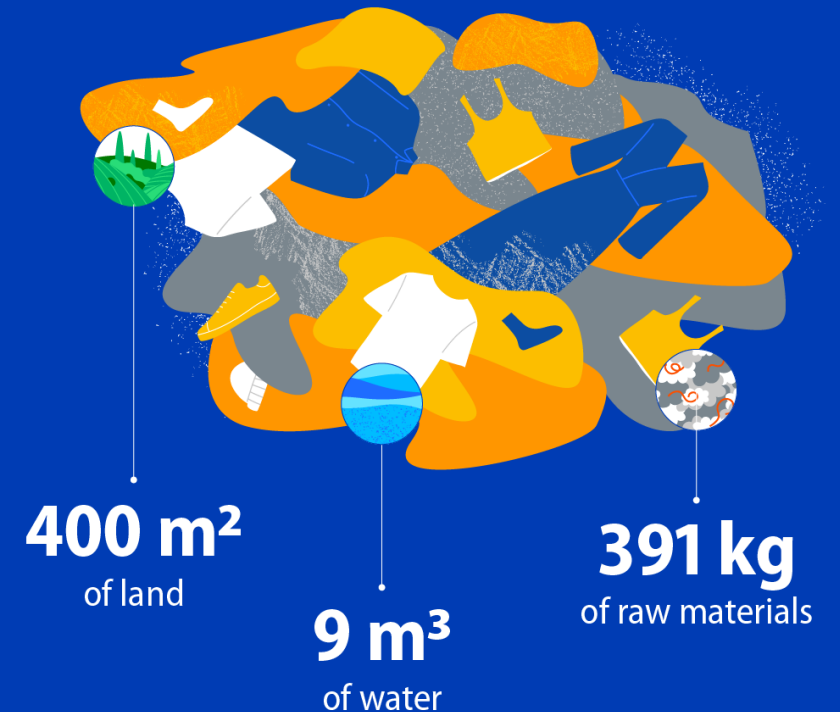
1. Environmental Impacts of textile products

Impacts:

- Overconsumption of natural resources
- Water pollution
- Greenhouse gas emissions
- Textile waste in landfills and low recycling rates
- Use of harmful chemicals
- ...

THE ENVIRONMENTAL IMPACT OF TEXTILES

In 2020 textile consumption per person in the EU required on average:



And caused a carbon footprint of about **270 kg**



(c) Francois Le Nguyen, Unsplash

Sorting through hundreds of tons of clothing in an abandoned factory for a social mission called Clothing the Loop, Cambodia



2. Chemicals in textiles – case study

Textile products drive immense environmental impacts

- Textile products have some of the most complicated chemical profiles of any product, with multiple chemical substances used to manufacture, process, weave, dye, finish, and assemble clothing and accessories. These substances may remain on the product during the use phase – either intentionally or not intentionally.
- Yet, information about the substances in our textiles is often non-existent.



3. EU policy mechanisms – opportunities for ‘ingredient lists’ for chemicals in clothing

- The 2014 review of the Textile Labelling Regulation concluded that more research was needed on allergenic substances in textile products and that the “need for further measures to control the presence of substances (in particular sensitizers) which are found in finished textile products and may be released from products should be assessed”.
- The Chemicals Strategy for Sustainability commits to substitute and minimize the presence of substances of concern in consumer products, such as textiles.
- The revision of the TLR – and the introduction of the DPP under the new ESPR – **should support full disclosure of harmful chemicals used in manufacturing processes and those present in textile products.**
- As a minimum, we need disclosure of all substances of very high concern (SVHCs); carcinogens, mutagens and reprotoxic substances (CMRs); allergens and sensitisers; endocrine disrupting chemicals (EDCs); per- and polyfluoroalkyl substances (PFAS) – including fluorotelomer acrylates (FTAs) and fluorotelomer alcohols (FTOHs); heavy metals; neurotoxins; flame retardants (halogenated compounds); alkylphenols; and phthalates.



4. Global mechanisms

- [UNECE Recommendation No.46](#): Enhancing traceability and transparency of sustainable value chains in the garment and footwear sector (ECE/TRADE/463)
- Target B3 set through the Global Framework on Chemicals (previously SAICM) is about chemicals in products and getting information to consumers. To meet this target, information must be made publicly available of all Substances of Concern in products. The Commission should refer to the criteria on information exchange systems for disclosing chemicals in products set out in the Guidance for stakeholders on exchanging chemicals in products information from the Strategic Approach to International Chemicals Management (SAICM) 'Chemicals in products' programme.



5. Civil society initiatives

- The **Fashion Transparency Index** is an annual exercise carried out by the NGOs Fashion Revolution and Ethical Consumer to track commitments made by companies.
- The Index ranks 250 of the world's biggest fashion brands and retailers based on their public disclosure of human rights and environmental policies, practices and impacts across their operations and supply chains.

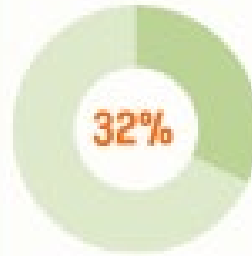
<https://www.fashionrevolution.org/about/transparency/>



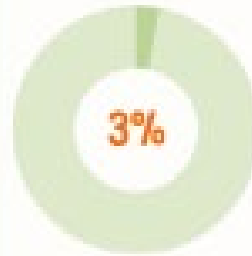


5. Civil society initiatives

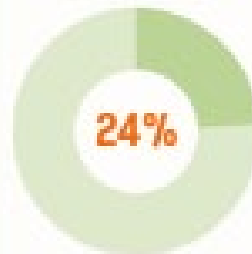
WATER USE



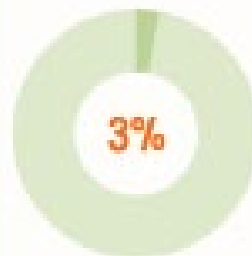
Publish annual water footprint in company's own facilities



Publish annual water footprint at raw material level



Publishes annual water footprint at manufacturing and/or processing facility level

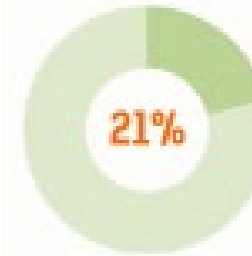


Publishes annual water footprint at fibre production and/or raw material level

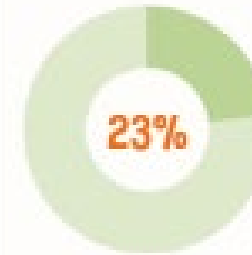
HAZARDOUS CHEMICALS



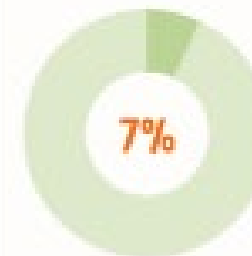
Discloses a time-bound commitment/roadmap to eliminate the use of hazardous chemicals as aligned with international standards such as ZDHC and Bluesign



Discloses measurable progress towards eliminating the use of hazardous chemicals at supply chain partners as aligned with international standards such as ZDHC MRSL, e.g. via Bluesign or StEP by Dekotex



Disclose process for conducting water-related risk assessments



Publishes supplier wastewater test results



6. Aarhus Convention Requirements

- **Article 5(6)**

“Each Party shall encourage operators whose activities have a significant impact on the environment to inform the public regularly of the environmental impact of their activities and products, where appropriate within the framework of voluntary eco-labelling or eco-auditing schemes or by other means.”

- **Article 5(8)**

“Each Party shall develop mechanisms with a view to ensuring that sufficient product information is made available to the public in a manner which enables consumers to make informed environmental choices”



6. Aarhus Convention Requirements

- **7th Task Force on Access to Information**

(c) Called on Parties to continue developing and improving frameworks encouraging operators whose activities had a significant impact on the environment to apply tools such as eco-labelling, energy-labelling, product passports, product declarations, warning labelling and other tools to inform the consumers;

Green Claims and Information Disclosure

LOVE
ME
LONGER

WHO
MADE
ME?

FASHION
TAKES
ACTION





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