

Cepi feedback for the inception impact assessment on the EU strategy for sustainable textiles

Sustainable textiles: the European pulp and paper industry is part of the solution

Cepi welcomes the European Commission's call for a sustainable recovery of the European textile industry, aligned with the objectives outlined in the European Green Deal, the Circular Economy Action Plan, and the Industrial Strategy. As highlighted in the roadmap, the textile industry is a resource-intensive sector in terms of raw materials, energy and water usage with long value chains. After the COVID-19 outbreak showcased the fragility of economic systems that depend on global supply chains, the European Union committed to improving its resilience.

There is a huge untapped potential within the European textile industry to foster sustainable economic growth, to improve the competitiveness of our industries and to build more resilient supply chains. We believe that the European pulp and paper industry has the capability to be part of the solution, as explained in a study recently published and dedicated to biorefineries¹. Cepi acknowledges that this potential needs to be tapped into through a coherent policy framework, that provides businesses with certainty to invest in long term sustainable solutions, that will benefit our European industry, our citizens and our environment.

In the light of the EU-Next Generation Recovery Plan, it is essential that the European Commission encourages the development of a new kind of European textile industry, which will be able to **increase European resilience**. Cepi believes this objective can be achieved by relying on, where possible, the sustainable and European sourcing of renewable raw materials and the deployment of innovative, cleaner European technologies that will contribute to a more circular economy.

To ensure that the textile industry becomes more circular and less energy intensive, it is important to follow a holistic approach that will consider the necessary steps along the entire value chain.

As the choice of the fibres and the product's design not only define the textile product properties and performance, but also determines the environmental impact of the resulting product, ***we believe the European Commission should take measures to ensure more sustainable and recycled material inputs are the starting point of a more sustainable and circular European textiles industry.***

Wood-based cellulose fibres are already commercially available, having the same level of malleability as synthetic fibres, while retaining the comfort typical for natural fibres. This kind of fibres should be promptly promoted as a highly sustainable alternative. By incentivising the uptake of wood-based cellulose fibres, Europe could significantly decrease its dependence on imported raw materials and reduce GHG emissions, arising both from the transport and the manufacturing of textiles in extra-EU countries. In Europe, the sourcing of forest biomass is framed by both European and national legislations, as well as market-based certification systems, which ensure the product is not contributing to deforestation or biodiversity loss, but rather to sustainable forest management, increasing the abilities of our forests to act as carbon sinks. Additionally, the uptake of wood-based cellulose fibres can also deliver on other important environmental objectives, such as the need to control and prevent pollution. ***Wood-based cellulose fibres are 100% renewable, recyclable and biodegradable. They also have a low water footprint during the growth phase and do not lead to soil depletion*** but are rather capable of reversing soil degradation and erosion.

The European pulp and paper industry is a key player in the transition towards a more circular economic model and is committed to retaining the value of the materials used in the loop for as long as possible³. ***This effort can also be recognised in the different solutions our industry has developed to improve the circularity performance within the textiles industry.***

Keeping in mind the goal of achieving a fully circular system, where, instead of becoming waste, resources that have reached their end-of-life stage or are being discarded are used as material input, we would like to inform the

¹: [Biorefineries in Europe: a study conducted by the Confederation of European Paper Industries, January 2021](#)

²: https://www.researchgate.net/publication/227883017_Biodegradability_of_cellulose_fabrics

³: In 2019 57.5 million tonnes of paper and board were collected in Europe and recycled by the paper industry, almost reaching the physical capacity limit with an overall recycling rate of 72%.

Commission and other stakeholders that it is currently possible for our industry to preserve the material value of used textiles. Industry effort made it possible to recycle old textiles, made also from non-wood-based fibres, using an innovative process that allows for the separation of synthetic fibres from cotton, or other plant-based fibres from mixed textiles, to make them a secondary raw material for new textiles.

While investing in research and development to find new sustainable materials is certainly important, it is also urgent to increase the market demand for more sustainable material inputs, such as recovered fibres and wood-based fibres, which are already available could provide immediate environmental benefits if mainstreamed. Incentivising the use and consumption of textiles made from these sources, would also provide certainty to European industry to increase the investments related to the technologies that process and recycle this kind of fibres. These technologies are European and have been advancing the material technology in the area significantly in the past ten years. In the long run, this approach could become a competitive advantage that could make the European textile industry a sustainability role model.

Another concern the industry would like the EU Sustainable textile strategy to address is the proliferation of green labelling schemes with different requirements. As the scope of the labels seems to change quite often and the requirements needed are not always science-based, we believe that the upcoming strategy should create standardised methods for green textiles labels to create a level playing field for this kind of products.

Considering the holistic approach needed to increase the overall sustainability of the textiles industry, we would like to recall the Commission on the importance of increasing the recycling rates for textiles in Europe. In order to do so it is necessary to invest in the necessary infrastructure for the sorting, collection and recycling of textiles.

As the inception impact assessment duly pointed out, the European textile and clothing industry faces an uneven playing field due to the often-lower production costs and environmental and social standards in place in third countries. We would like to highlight that by incentivising the development of a truly European textiles industry, in both materials and technologies deployed, would not only result in tangible environmental benefits, but would also yield social ones. However, while we agree that the textile strategy should have a social reform focus as well, we also believe that such objectives should be addressed by the Commission's proposal on sustainable corporate governance and mandatory due diligence.

We thank you for consideration and remain at your disposal in case any further information was required.

About Cepi :

Cepi is the European association representing the paper industry. We offer a wide range of renewable and recyclable wood-based fibre solutions to EU citizens: from packaging to textile, hygiene and tissue products, printing and graphic papers as well as speciality papers, but also bio-chemicals for food and pharmaceuticals, bio-composites and bioenergy.

We are a responsible industry: 92% of our raw materials are sourced in Europe and certified as sustainable, 91% of the water we use is returned to the environment, in good condition. We are the world champion in recycling at the rate of 72%. At the forefront of the decarbonisation and industrial transformation of our economy, we embrace digitalisation and bring 20 billion value addition to the European economy and €5.5 billion investments annually.

More information about our sustainability performance [here: https://sustainability.cepi.org/snapshot/](https://sustainability.cepi.org/snapshot/)

Through its 18 national associations, Cepi gathers 500 companies operating 895 mills across Europe and directly employing more than 180,000 people.