

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1,800 sporting goods manufacturers (85% of the European market) through its 12 National Sporting Goods Industry Federations and its directly affiliated member companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 650,000 EU citizens and has an annual turnover of some 66 billion euro.



Federation of the European
Sporting Goods Industry

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The sporting goods industry supports efforts to transition to a circular economy. Our industry has been investing in resource efficient solutions for years and continues to invest in sustainable innovative solutions to reduce the environmental footprint of production and products throughout their lifecycle. The Federation of the European Sporting Goods Industry (FESI) calls on Members of the European Parliament Environment (ENVI) Committee to adopt sustainable and effective amendments pertaining to footwear and apparel waste management by considering the following:

- Invest in new infrastructures needed for sustainable waste management of textiles in Europe;
- Secure high quality secondary raw materials to increase user confidence and strengthen demand;
- Create industry specific EPR schemes: one size doesn't fit all;
- Avoid limiting innovation through prescriptive design requirements.

Invest in new infrastructures for sustainable waste management in Europe

In Europe, sustainable textile waste management requires more and better infrastructures. The systems that are currently in place in some Member States are mainly designed for resale and overseas export of clothing. Also, export markets are increasingly saturated. It is therefore important to rethink existing and future schemes to make them suitable for increased reuse and recycling. In Europe (and beyond), cost-effective and commercial-scale textile recycling technologies are not available, in particular for mixed and complex materials. Textiles are becoming increasingly complex because of the materials used to deliver innovative and high performance products to consumers. Investment in recycling technologies based on infrastructure needs is a critical component of a restorative and regenerative circular economy.

Several actors in the textile fibres value-chain, including footwear and apparel industry leaders, are currently discussing an industry-wide collaborative research program, in partnership with the Ellen MacArthur Foundation. The research aims to overcome the limitations of today's incremental improvements and fragmented initiatives, to create a systemic global and cross value-chain approach to transition the fibres value-chain into a positive spiral of value capture, more resilient economics, and better environmental outcomes.

We expect the question of infrastructure for textile collection, processing and sorting to be addressed as part of this work. Preliminary findings will be shared in May 2017 and we recommend the EU consider the outcome of the research.

Secure high quality secondary raw materials to increase user confidence & strengthen demand

In order to secure the economic and environmental viability of reuse and recycling, a constant flow of high quality secondary raw materials is needed. Also, to boost the use of secondary raw materials, end-of-waste criteria must ensure high quality material and compliance with existing legislation, e.g. for chemicals REACH and other chemical regulations should serve as a basis when developing the criteria.

Textiles are complex, mixed materials and it may therefore be challenging to set standards for their use as secondary raw materials. These challenges need to be understood better, potentially through a feasibility study, which requires close collaboration between the EU Joint Research Center, Member States, industry and academia. Furthermore, end-of-waste criteria should be defined at EU level and emphasis should be placed on the consistent interpretation and implementation of EU waste policy and objectives across Member States to leverage the potential of the single market.

Create industry specific EPR schemes: one size doesn't fit all

EPR schemes should be considered on a case-by-case basis, taking into consideration the specificities of the industry in question. One size doesn't fit all. As the minimum requirements would apply to any existing or future EPR scheme, it is important to ensure that these requirements can be applied and are appropriate for any particular waste stream.

EPR costs should not be modulated based on the presence of 'hazardous' materials. The interface between chemicals and waste legislation is a complex matter and therefore should be addressed as outlined in the Circular Economy Action Plan. Furthermore, existing chemicals legislation already addresses the concerns expressed in the amendments.

The calculation of the financial contributions required from producers should be proportionate to their role and responsibilities and should not go beyond that. Also, obligations should be explicitly differentiated: clear roles and responsibilities should be defined for all actors involved in EPR implementation – industry, municipalities and consumers.

Avoid limiting innovation through prescriptive requirements on product design

Innovation plays a critical role in the sporting goods industry. It allows the sector to serve the athletes and respond to consumer trends and expectations. Innovation and performance are the core of product design. Resource efficiency has also become an intrinsic component of innovative product design (e.g. methods of make that reduce waste in the manufacturing phase). Resource efficiency goes beyond making products repairable and recyclable.

Instead of only focusing on the end of life of products, a more holistic approach is needed in order to increase resource efficiency. A lifecycle assessment is generally the most appropriate methodology to determine relevant measures to reduce the environmental impact of products. EU Environmental Footprint (PEF) pilot projects are currently being conducted and aim to find appropriate methodologies to measure the environmental impact of products and assess suitable tools for communicating this information to consumers. These pilots are ongoing for footwear and T-shirts and will provide helpful industry learnings and recommendations.

In light of the above, end of life waste legislation should avoid prescriptive design requirements and align with insights from the full life cycle assessments of products in order to be effective and not hamper innovation.