Joint statement from Cross Industry Agreement Signatories in response to the EU Stakeholder Workshop on Microplastics and EU Call for Evidence on measures aiming to reduce the presence in the environment of unintentionally released microplastics from tyres, textiles and plastic pellets[1]

Introduction

The Cross Industry Agreement[1] signatories have been working with the European Commission on this topic since 2018. Collectively, their associated memberships, and the community of research organisations and stakeholders that it has created are committed to tackling emissions of microplastics throughout the life cycle of products. As responsible sectors and organisations we welcome any effort that is science and risk-based, realistic, enforceable and proven to provide effective impact.

The signatories of the CIA welcome the opportunity to provide feedback on the impact assessment on the proposed measures to reduce the impact of microplastics pollution on the environment. The submission focuses on questions and assumptions that - if not resolved - could potentially render the proposed measures useless or in some cases counterproductive.

Response to BIOIS Study

Inconsistencies with production and consumption data

In the presented data, there is a general confusion on the production, consumption and end uses of textiles and fibres within the EU. Data from 2019[2] demonstrates:

- EU man-made fibre (MMF) production only accounts for 4% of global fibre production. MMF include both synthetic and cellulosic fibres (the latter account for ca. 23 % of EU MMF production. Regenerated cellulose in the form of e.g. viscose or lyocell is not plastic (SUP Directive) and is therefore not part of the scope of this study.

[1] The Cross Industry Agreement (CIA) is a voluntary collaboration for the prevention of microplastic release into the aquatic environment during the washing of synthetic textiles. The signatories are five European industry associations representing the global value chain of garments and their associated maintenance, namely AISE, CIRFS, EOG, EURATEX and FESI. The CIA signatories believe that to address this issue, coordination of efforts across different domains of knowledge and at a global level is necessary.
The five associations agree to support finding effective and economically feasible solutions by:

- Contributing to the development of international standardised test methods to identify and quantify microplastic present in water and the environment
- Sharing information on progress of research, knowledge gaps, options and priorities
- Supporting and participating in industrial research for feasible and effective solutions

Coordination of efforts is intended to compliment, without replacing, individual efforts and to accelerate identifying and deploying effective global solutions.

[2] CIRFS European Man-Made Fibre Association. Data from CIRFS Yearbook, available on request.

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- Wider European (incl Turkey and Switzerland) textile mill consumption data[3] on end-uses suggests that only ca. 30% of all fibres (synthetic, cellulosic and natural) go into apparel/clothing. The remaining 70% goes into home textiles (28%) and technical textile (42%) applications, both of which are washed less frequently and mainly professionally cleaned.

Data conflicts on consumption, washing frequency and subsequent MP release
In the presented information, a rise in MP release is predicted based on increased laundering frequency due to forecasted increased consumption. However, it is not possible to determine a relationship between consumption and either microplastic emissions or laundering frequency. Laundry frequency is related to wear frequency, and not ownership/consumption volumes.

A consumer habits data survey[4] carried out by A.I.S.E. showed that between 2017-2020 the average number of washes rose by 10% to 6.7 washes every 2 weeks after falling over the period 2008-2017. At the same time the fill level has remained constant with 82% of machines being full, although we know washing machine capacities have increased.

Challenges circularity principles
The report acknowledges that garment ageing increases emission rates due to degradation of the garment fibre structure. While this statement is correct, measures to address this contradict basic circularity principles where garment longevity and durability are key, and ways to extend the garment lifetime encouraged. This suggests that measures to extend garment lifetime as is the focus of Circular Economy Action Plan (CEAP) may be increasing the risk of microplastic release due to degradation and presents a general confliction between various policy and legislative initiatives.

Response to Call for Evidence

Misunderstands the full scope of the Cross Industry Agreement (CIA)
The CIA initiative was set up in response to requests for action from the European Commission in 2018 and the CIA signatories have been in discussion with the Commission on this topic since that time.

The signatories and associated stakeholders have successfully delivered the first aim of the agreement, the development and certification of a globally harmonised test method which is a necessary pre-requisite to the development of effective and economically feasible solutions as well as towards effective policy development.

A statement in the call for evidence suggests that voluntary approaches are limited and have achieved little to no reduction so far. Given the progress to date made by the CIA we suspect that the scope and achievements of the CIA have been misunderstood and recommend that

[3] CIRFS European Man-Made Fibre Association. Data from CIRFS.
[4] A.I.S.E. *Pan-European habits survey 2020 Key facts & figures.* 2020. https://www.aise.eu/documents/document/20200917130851-aise_consumerhabitssurvey_2020_highlights.pdf

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the work to date (which has been carried out in-kind, at an estimated cost of over €400,000) is not dismissed and is leveraged appropriately going forward.

The finalisation of this harmonised test method allows the CIA to achieve their two further objectives of sharing information and knowledge to define common priorities to fill knowledge gaps and advise on mid/long-term measures and supporting and participating in industrial research activities to investigate feasible options to tackle the fibre fragmentation issue.

Fails to acknowledge existing industry initiatives to understand and reduce microplastics from textiles

The call for evidence suggests that industry is not acting on this topic and fails to acknowledge industry initiatives, most notably, the work of The Microfibre Consortium (TMC).

TMC is a research-led sustainable textiles NGO which works to convene the global textiles sector, to provide mitigation actions to limit fibre fragmentation and microfibre pollution. Their vision is set out in The Microfibre 2030 Commitment[5] and Roadmap which is an industry first in globally aligning the topic of microfibres against a collaborative, target based and accountable roadmap. Part of their outputs include the Microfibre Data Portal, an industry first in bringing together testing results with the underlying technical details required to run deep technical analysis.

Presents unfounded statements with no supporting data

The call for evidence does not provide a balanced representation of available research on the topic and makes unfounded statements without presenting supporting data on risks to human health, reduction of consumer confidence in food produce and the associated economic consequences, as well as on the economic impact on activities such as fishing and tourism.

The statements provided are 'worst case scenario', and none of the available peer reviewed reports that show otherwise are presented. A report from Science Advice for Policy by European Academies (SAPEA) suggests that 'in controlled experiments, high concentrations of these particles have been shown to cause physical harm to the environment and living creatures, including inducing inflammation and stress, however, concentration levels measured in many real-world locations are well below the threshold and there are also limitations in the measurement methods currently available'[6].

Challenges with regional initiatives

The issue of microfiber pollution has triggered policy initiatives across the world, notably in the individual states of the USA and more recently in Italy. Such early attempts aimed at introducing mandatory labelling in garment products to inform consumers of potential risk of fibers release or even advised to hand washing. While the efficacy or effectiveness of labelling initiatives remain unclear or is disputed, we observe that none of the measures proposed in

[5] The Microfibre Consortium, *The Microfibre 2030 Commitment*, 2021 https://www.microfibreconsortium.com/2030

[6] SAPEA, Science Advice for Policy by European Academies. *A Scientific Perspective on Microplastics in Nature and Society.* 2019 Berlin: SAPEA. https://doi.org/10.26356/microplastics

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US states has been finalised. In other European Member States the policy debate is on-going and may benefit of coordination with stakeholders as well as of alignment at EU level. As microfiber pollution is a global issue, harmonised policy measures shall be preferable to isolated initiatives.

Response to Suggested Policy Options

In response to the suggested policy options for synthetic textiles we provide the following feedback:

Ecodesign requirements including using new materials such as biodegradable yarns
In principle we support the idea of ecodesign requirements that recognise the following considerations:

- The ecodesign framework must be developed based on scientific data that considers the impacts of different material profiles in addition to shedding volumes.
- Costs and implementation conditions in real-life manufacturing must be considered.
- Ecodesign requirements must consider all environmental sustainability topics with all potential impacts measured using a common framework, for example the PEF.
- Ecodesign measures must support and/or align with those stipulated in the Sustainable Product Initiative (SPI) as part of the Circular Economy Action Plan.
- Biodegradable yarns should not be focused on as a solution due to mounting evidence[7,8,9,10] around the lack of biodegradation potential of so called 'biodegradable fibres' in locations where factors that promote biodegradation (UV, temperature, oxygen, appropriate pH, microbes etc) are absent. For example, deep sea, soil etc.
- This approach may result in quick fixes such as chemical impregnation which could have unintended consequences, would require more production processes and lead to increases in GHG impact.

Improving manufacturing processes including pre-washing of clothes, before they are placed on the market

- Prewashing in Europe may be viable due to the existing efficient WWTP infrastructure, however garment production and assembly in the EU is minimal.
- The global nature of value chains would make this hard to regulate as it removes the problem from the EU jurisdiction into geographies over which the EU has little to no influence.
- From an industry perspective this would be fragmented and difficult to control due to the varied nature of suppliers, from suppliers with in-house facilities to those using contract laundries.

Establishing rules to make producers responsible for intervening before products can become waste, such as take back schemes

[7] OWS. (2019). *Biodegradation study in partnership with Patagonia.* Email: stephanie.karba@patagonia for more details
[8] Li, L., Frey, M. and Browning, K. J. (2010) *Biodegradability Study on Cotton and Polyester Fabrics*. Journal of Engineered Fibers and Fabrics, 5(4), pp. 42–53. Available at: http://www.jeffjournal.org (Accessed: June 23, 2021).
[9] Zambrano, M.C.,Pawlak, J.J.,Venditti, R.A..(2020) *Effects of chemical and morphological structure on biodegradability of fibres, fabrics and other polymeric materials*. BioResources, 15(4), pp.9786–9833.
[10] Collie, S.R., Ranford, S.L., Fowler, I.J., Brorens, P.H., *Microfibre Pollution-What's the Story for Wool?.* 2019. AUTEX2019 – 19th World Textile Conference on Textiles at the Crossroads, 11-15 June 2019, Ghent, Belgium

This approach would have little impact and is not relevant to address microplastic emissions.

Facilitating recycled content or remanufacturing
There is no evidence to suggest that the use of recycled content or remanufacturing would impact the release of microplastics from synthetic textiles.

Applying filters or other technical solutions to washing machines, washer-dryers, and tumble-dryers
End of pipe solutions, while seemingly easy, come with several challenges which highlight the need for addressing the root cause and not rely on end of pipe solutions:

- Tangible solutions rely predominantly on regular consumer interaction to achieve impact. Engagement with consumers to commit and maintain that commitment is difficult.
- These solutions are only viable in wealthy western countries, while this is a global problem.
- Filters or other technical solutions require an infrastructure to collect and properly dispose of the collected waste.

Setting minimum sustainability and/or information requirements, and labelling products according to their level of microplastics emission

- There is currently insufficient information that could be printed on a label and the challenges of generating this information for every material are significant. Furthermore, accounting for how different materials are used in garments in a reliable and reproducible way is not understood.
- The relationship between the physical flows and concentrations of microplastics and the associated environmental impacts is not understood. While the industry is a considerable way towards a global standardised method to assess material loss from fabrics, this only provides a measure of quantity and significant challenges remain in translating from presence to impact.
- This needs to be well designed to drive impact and will only drive impact if supported by consumer campaigns.
- There has been no impact assessment of labelling or if it will drive change at the point of purchase.

Developing voluntary approaches by industry
We support this suggestion and highlight the Microfibre Consortium 2030 Commitment and Roadmap as an initiative that with appropriate support, could work with industry to scale data collection, and develop appropriate solutions.

Common position from signatories of the CIA

The signatories of the Cross Industry Agreement support both policy and legislative measures to reduce the environmental presence and associated risks of unintentionally released microplastics from textiles. However, we emphasise the existence of the knowledge gap that is acknowledged by the European Commission in the call for evidence.

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For policy measures to be effective we need more data and to build upon the outputs of the work that has occurred to date with the development and certification of a test method. We call on the European Commission to respect the time and effort that has been spent on the development and standardisation of the method within a reasonable timeframe. The existence of this critical first step now puts the industry in a good position, and with appropriate support from the European Commission, able to bridge the knowledge gap and rapidly scale the data required to create meaningful policy measures.

As such, we call on the EU:

- To support the industry to bridge the research and innovation gap as a priority through the allocation of targeted funding that is cross disciplinary, multi-regional, and multi-sector.
- For policy or legislative measures to be based on detailed risk and impact assessments.
- For any eventual ecodesign measures to be well-developed and address the challenge in a scientific manner.
- For a harmonised approach that does not allow fragmentation at a member state level.
- For alignment between policy and legislative initiatives (SPI, CEAP, PEF) that use a common assessment framework where possible.

About the CIA:

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