

Joint letter on concerns over methodologies for environmental impact assessment of natural fibres used in textiles

Brussels, 07 April 2025

Dear Executive Vice-President Séjourné,

Dear Commissioner Roswall,

Dear Commissioner Hansen,

CC Director Generals: Florika Fink-Hooijer, Kerstin Jorna, Wolfgang Burtscher.

We, the undersigned civil society organizations, are writing this letter to express our concern about how natural fibres and textiles made from natural fibres are currently looked at when developing legislation for a sustainable textile sector, notably in the context of PEF or LCA methodologies to assess environmental impacts or footprints and the circulatory capability of different textile and fibre types.

Against this background we ask you to take a more differentiated view of natural and synthetic textile fibres and their production methods and to adequately consider the positive characteristics and the beneficial role of natural, especially organically cultivated natural fibres and to adopt a more holistic perspective on sustainability.

As assessing the environmental impacts of a product is very complex and can lead to very different outcomes depending on the selected scope, system boundaries, impact criteria, data collection methods or weighting of criteria, PEF and LCA methodologies are by nature subjective and susceptible to being influenced by vested interests.

This is why we urge you to ensure that any PEF or LCA methodology used to assess the impact of different textiles be developed by independent institutions and informed by broad stakeholder participation. Furthermore, we recommend commissioning a study or impact assessment looking at different PEF and LCA methodologies and evaluating their potential to steer the market towards truly sustainable fibre production.

We also believe that there is a need for interservice cooperation that brings together expertise and provides information on natural textile fibres which are not only at the core of a more sustainable future textile sector but play an important role in the revitalization of textile value chains in Europe.

Despite increasing efforts toward sustainability, the textile industry's current trajectory is still incompatible with achieving key goals to mitigate climate change and its negative environmental and social impacts are further increasing with overproduction remaining rampant and unsustainable business models persisting. In 2020, according to an assessment made by the European Environment Agency, textile consumption in Europe had on average the fourth highest impact on the environment and climate change from a global life cycle perspective. It was the consumption area with the third highest impact on water and land use, and the fifth highest in terms of raw material use and greenhouse gas emissions.¹ In addition, high amounts of textile

¹ "Per average person in the EU, in 2020, [textile consumption](#) required nine cubic metres of water, 400 square metres of land, 391 kilogrammes (kg) of raw materials, and caused a carbon footprint of about

items end up as waste, often in third countries after export, as they have low reuse value (given an overflowing second-hand market and increasingly poor quality).

To reverse this trend of textile products becoming waste shortly after they hit the market, we must ensure that textiles are valued more again, and that they are used for longer. We need EPR fees that penalise companies engaged in the most aggressive fast fashion practices such as high product volumes, rapid collection renewal, discounts, small parcel sales, and aggressive advertising and marketing.

One of the most important pillars of the required transition, however, is the shift away from synthetic fibres (being the primary enabler of fast fashion) towards natural fibres which have many advantages:

1. As the EU is planning on making use of the growth potential of bio-based materials and to substitute fossil-based materials, natural fibres are the obvious choice for textile products. Natural fibres are from plant origin, such as cotton, linen, jute and hemp, or from animal origin such as wool and silk. These are renewable sources and, when cultivated and processed responsibly, reduce reliance on fossil-based raw materials through carbon substitution. In this way, they can significantly reduce the overall carbon footprint of textile products as compared to fossil-based synthetic fibres. This advantage becomes even more significant for natural fibres produced with sustainable or organic methods that limit or ban the use of pesticides and synthetic fertilizers.
2. The cultivation of natural fibres is often associated with high water and land use and this impactful life stage for textiles made of natural fibres is reflected in the PEFCR for Apparel and Footwear. The PEFCR, however, do not apply the same system boundaries and do not consider the impacts of the extraction of crude oil and the very energy-intensive chemical reactions required to produce synthetic fibres, which results in an inequitable comparison leading to a less favourable environmental footprint for natural fibres.
Actually, a large portion of the water needed to produce natural fibres comes from rainfall (depending on the region) and according to a recent study, the cotton's irrigation footprint is significantly lower than previously reported.² In addition, natural fibres are beneficial not although, but because they are agricultural products that provide “an important source of income for farmers and thus can play an important role in contributing to food security and nutrition, the realization of the right to adequate food and in eradicating poverty and hence in contributing to the achievement of the Sustainable Development Goals.”³ These farmers are predominantly smallholders who, for example, are estimated to produce over 75% of the world's cotton and are dependent on cotton for their livelihood and income.⁴
3. Synthetic fibres not only use finite resources in fibre production, but they also come with an unsolved problem: the release of microplastics. Globally, synthetic textiles account for 16-35% of microplastics released to oceans, according to estimates presented by the European Environment Agency.⁵ Furthermore, synthetic textiles do not only shed microplastics during their use phase, but throughout their whole lifecycle and notably also once they have been

270 kg. Most of the resource use and emissions took place outside of Europe.” [Textiles | European Environment Agency's home page](#)

² International Cotton Advisory Committee: [Water Footprint in Cotton 2020-2024: A Global Analysis](#)

³ UN Resolution 78/169 of December 2023 on natural plant fibres and sustainable development

⁴ [The cost of exclusion - How leaving smallholder farmers behind could disrupt global and EU markets; World Cotton Day 2023 Final Report EN.pdf](#)

⁵ [Textiles | European Environment Agency's home page](#)

discarded (according to a recent study, more than 80% of the textile related microplastics in the environment come from discarded synthetic clothing and not from the washing of apparel).⁶ This is concerning, since today high amounts of discarded synthetic textiles end up in open landfills and informal waste streams where they become a source of pollution with serious environmental and human health implications associated with it.⁷ The Group of Chief Scientific Advisors, whose role is to provide scientific advice to the College of European Commissioners, therefore recommend preventing and reducing microplastic pollution and targeting the most polluting activities with legal actions.⁸

Natural fibres, on the other hand, are to a large extent biodegradable, and the microfibrils shed during the lifecycle of textile products made from natural fibres must be clearly distinguished from microplastics in terms of their impact.⁹

4. Last but not least, natural fibres and sustainably produced textiles made of natural fibres offer opportunities for revitalizing and developing sustainable value chains also in Europe - spanning from farm-level cultivation to final garment manufacturing. By effectively incentivizing or demanding sustainable (preferably organic) cultivation methods for natural fibres, strict environmental and social criteria for all textile processing stages and the inclusion of external costs in (higher) product prices, EU legislators could create a market for sustainably produced textiles, which would benefit third country actors as well as local industries and SMEs in Europe. This, in turn, could promote regional innovation, and the positioning of the EU as a global leader in sustainable and circular textile systems.

We would be delighted to have the opportunity to meet with you, answer any questions that you might have or explain in more detail the above-mentioned concerns and our recommendations to address them.

Sincerely Yours,



⁶ [BWB_Studie_2025_P4.indd](#)

⁷ [EU exports of used textiles in Europe's circular economy — European Environment Agency](#)

⁸ [SAM-Summary_Factsheets_A4_Microplastics_042022.pdf](#)

⁹ [BWB_Studie_2025_P4.indd](#)