

The background of the entire page is a vibrant green color. It is covered with a repeating pattern of small, light-colored icons representing various organic products. These icons include fruits like apples, grapes, and strawberries; vegetables like carrots, mushrooms, and leafy greens; and animal products like cows, chickens, and fish. The icons are arranged in a grid-like fashion, creating a textured, organic feel.

# Organic textiles

Protecting the credibility of the organic label

August 2022

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## Executive summary: IFOAM Organics Europe Recommendations

In the European Union (EU), the use of the term “organic” in relation to textiles<sup>1</sup> is not protected the same way as it is for the food chain. There is a need to improve credibility, and thus ensure that when the term “organic” is used in this sector, it is clearly substantiated, and ideally relates to the whole production and processing chain, just as it is the case for certified organic food and drink products.

IFOAM Organics Europe recommends that for textile products to be labelled “organic”:

- The textile fibre should originate from raw material produced in organic farms according to globally recognised organic farming standards (such as the EU Organic Regulation or the US National Organic Programme, or standards in the IFOAM Organics International Family of Standards);
- The textiles should also be processed according to a recognised organic textile processing standard that prohibits hazardous and residual inputs according to clear criteria.
- IFOAM Organics Europe acknowledges that stating the organic fibre content (“contains X% organic fibre”) is a relevant and useful step.

Moreover, IFOAM Organics Europe recommends that the European Commission clearly defines and differentiates two categories of textile products that could use the “organic” claim:

- **textiles containing organic fibres:** textiles with minimum 50% organic fibres. In this category, only the traceability of the organic fibres will be required, enabling a guarantee to the end-consumer regarding the organic fibre content. At this level, no criteria at the processing stage regarding environmental (e.g., prohibited chemicals), nor social conditions will be required to be met.
- **“organic textiles”:** textiles with minimum 70% organic fibres and processed according to an adequate processing standard, produced with complete control of chemicals used (based on appropriate hazard and risk-based criteria), with respect of the environment, and minimum social conditions throughout the supply chain.

The approach suggested by IFOAM Organics Europe would require relatively little EU resource. The recognition of already existing standards is in line with the approach taken in the US. This approach is also in line with the EU Textile Regulation, that establishes harmonised provisions on the labelling and marketing of textile products in order to eliminate hindrances to the internal market in the textile sector and to guarantee adequate information for consumers, in particular relating to environmental and social labelling.

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<sup>1</sup> When referring to “textiles”, this paper refers to the textile products made with fibres listed in the Table 1 of the Annex I of the Regulation (EU) No 1007/2011 of the European Parliament and of the Council of 27 September 2011 on textile fibre names and related labelling and marking of the fibre composition of textile products.

Current situation at the EU level	IFOAM Organics Europe policy recommendations
<p><a href="#">Regulation (EU) 2018/848</a> on organic production and labelling of organic products protects the use of the term “organic”.</p> <p>Protection of the term “organic” for textiles through this regulation is limited in its scope: (1) it only applies to silkworm cocoon suitable for reeling, cotton, and wool (both non carded nor combed) and (2) does not extend to processed textile goods, being only limited to fibre.</p> <p><a href="#">Regulation (EU) 1007/2011</a>, that regulates textile fibres names, has a broader scope, including a large number of natural (and synthetic) textile fibres, including cotton, silk, wool, hemp or linen.</p> <p>This regulation does not protect the use of the term “organic”.</p>	<p>IFOAM Organics Europe recommends that the EU Commission amends the existing Regulation (EU) 1007/2011 on textile fibre names and related labelling and marking of the fibre composition of textile products.</p> <p>The following definition should be included:</p> <p><i>“The term organic and equivalent terms such as eco, bio, ecological (as per art. 30 of Regulation (EU) 2018/848 on organic production and labelling of organic products) in relation to textile and clothing/apparel may only be used if:</i></p> <ol style="list-style-type: none"> <li>1. <i>the goods have been produced in accordance with <u>a recognised, independently set organic textile scheme</u>, that meets the following criteria:</i> <ol style="list-style-type: none"> <li>a. <i>The scheme should be independent and impartial.</i></li> <li>b. <i>The scheme should be established accordingly with an open and transparent standard-setting process in line with industry best practices.<sup>2</sup></i></li> <li>c. <i>the label requirements are based on objectively verifiable and non-discriminatory criteria.</i></li> </ol> </li> <li>2. <i>the goods are certified by a duly accredited and independent certification body.</i></li> <li>3. <i>the goods clearly differentiate between textiles containing organic fibres and “organic textiles”.</i></li> </ol>

<sup>2</sup> Such as for example the best practices provided in the ISEAL Codes of Good Practice.

## Context

The Commission's [European Green Deal](#) (EGD), unveiled by the Commission in December 2019, has as one of its main objectives to “transform the EU's economy for a sustainable future” by *inter alia* “preserving and restoring ecosystems and biodiversity”.

The EGD spurred the publication of the [Circular Economy Action Plan](#) (CEAP), including a “sustainable products initiative and particular focus on resource intense sectors such as textiles, construction, electronics and plastics”. As such, the [EU strategy for sustainable textiles](#) is part of the CEAP and aims to “set in place a comprehensive framework to create conditions and incentives to boost the competitiveness, sustainability and resilience of the EU textile sector”. Protecting the term “organic” in the context of textiles is entirely in line with the objectives of this strategy.

## The need for action

Consumer interest in organic products of all types is growing. This is also the case with organic textiles<sup>3</sup>, where the market for organic products is increasing every year.<sup>4</sup> In the European Union (EU), the use of the term ‘organic’ in relation to textiles is not protected in the same way as it is for food. It is possible for textile products to carry an organic claim without the legal need to demonstrate that organic production (meaning the production of fibres under organic farming systems) and processing has taken place along the whole supply chain – “processing” referring to the whole process of conversion from fibre to fabric (and finished product), including spinning, weaving, knitting, finishing, dyeing and printing, and the Cut, Make and Trim (CMT) involved in garment production.

This may lead to misleading claims and creates an unlevel playing field for businesses. Interestingly, consumers are aware of this uneven playing field: 86% are in favour of an environmental impact and labour conditions labelling, and 82% agree that not enough information is available on environmental impacts. 87% think there should be stricter rules.<sup>5</sup>

The Impact Assessment<sup>6</sup> published as part of the review of the EU Regulation 834/2007 (EU Organic Regulation) acknowledged that the exclusion of textiles and clothing from the regulation could be considered a risk to the credibility of the term “organic”. It was recognised that the global nature of the supply chain would necessitate a global approach to the organic standard for the farm production of organic fibre, as well as textile processing and manufacturing. As such, as per Article 2 of Regulation 2018/848, this legislative framework covers “products originating from agriculture”, as well as “products closely linked to agriculture” such as those listed in Annex I of the same regulation, among which “cotton, not carded or combed” and “wool, not carded or combed”.

Today, organic fibres are produced on organic farms that meet organic production standards and are independently certified by organic certification bodies, according with the applicable regulation.<sup>7</sup> However, the rest of the chain, i.e., processing, manufacturing and wholesale are not included even though they are also of great importance. For textiles and clothing processed and manufactured using

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<sup>3</sup> Textiles refers to all textile products, including fabric, garments and personal care products.

<sup>4</sup> In 2018, market value was estimated to more than 37 billion US Dollars. Source: [Sutlej Textiles \(2020\), A Global Textile Trend – Switching to Organic Clothing](#).

<sup>5</sup> European Commission (2020), [Special Eurobarometer 501: Attitudes of European citizens towards the Environment](#).

<sup>6</sup> [Impact Assessment \(2014\) accompanying the Proposal for a Regulation of the European Parliament and of the Council on organic production and labeling of organic products](#).

<sup>7</sup> E.g. EU Regulation 2018/848, NOP (USA), NPOP (India), IFOAM Standard.

certified organic fibre to be certified as organic textiles to adequate processing standards, they must undergo certification to a standard such as the Global Organic Textile Standard (GOTS).

**At present, there is a clear risk of 'greenwashing', i.e., unsubstantiated, vague claims regarding the green credentials of a product. This emphasises the need for action at the European level.**

## The market for organic fibre, textiles and clothing

Demand and production of organic cotton continue to boom year after year. These trends are the result of a growing consumers sensitivity for sustainable solutions and protection of the environment. In 2018, the global market size of organic cotton crossed USD 37bn<sup>8</sup>, although organic cotton still only comprises 1.1% of the total cotton production in the world, which is an indicator for a potential growth.<sup>9</sup>

According to the 2021 Organic Cotton Market Report, 249,153 tonnes of organic cotton were produced in 2020, a 3.9% growth compared to 2019. The three main organic cotton producers are India, China, and Kyrgyzstan. Worldwide, 21 countries are growing organic cotton.<sup>10</sup>

Taking advantage of the economic recovery and the consumers' willingness to switch to more sustainable alternatives, the sector expects the production to grow by 48% in 2021: increased demand leads to increased price, making organic cotton a more attractive option for farmers.<sup>11</sup>

The continuous development of the market also leads to a steep rise in facilities being certified as organic by GOTS. According to the World GOTS Annual Report 2020, more than 4 million workers were reported in 10,388 GOTS-certified facilities in the world – 7,765 facilities were reported in 2019.<sup>12</sup> There are significant rises in the EU: countries with largest growth in GOTS-certification in percentage in 2019 were the Netherlands (+73%) and Spain (+71%)<sup>13</sup> and the 2020 Top 10 countries for certified facilities include Germany (684), Italy (585) and Portugal (449).<sup>14</sup>

After some years with a stable growth rate between 6 and 16%, the Organic Content Standard (OCS) has experienced a significant growth of 47% in 2019, with 6,294 OCS-certified companies.<sup>15</sup>

## Existing schemes for protecting the credibility of organic textiles

The credibility of organic textiles depends on the credibility of two separate but linked parts of the value chain – the production of the organic fibre<sup>16</sup>, and the processing, manufacturing and retailing of that organic fibre into textile products (for example: apparel, fashion, home textiles and personal care products).

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<sup>8</sup> Sutlej Textiles (2020), *A Global Textile Trend – Switching to Organic Clothing*.

<sup>9</sup> Organic Growth (2021), Inside Denim, Issue 4.

<sup>10</sup> Textile Exchange (2021), *Organic Cotton Market Report 2021*.

<sup>11</sup> *Ibid.*

<sup>12</sup> GOTS (2021), *World Annual Report*.

<sup>13</sup> GOTS (2020), Annual Press release, *GOTS registers highest growth rate ever in 2019*.

<sup>14</sup> GOTS (2021), Annual Press Release, *GOTS certifications in 2020 reach five figures for the first time*.

<sup>15</sup> Textile Exchange (2020), *Quick guide to the organic content standard*.

<sup>16</sup> Organic fibre refers to every other fibre but cotton: wild crafted and other fibre types, including fibre animals not produced on a farm – e.g. in mountainous regions or other types of lands.

### *Protecting the credibility of the organic raw fibre through the whole textile supply chain*

Several textile production standards for “more sustainable” natural fibres production exist, yet they are not organic.<sup>17</sup> The Textile Exchange’s Organic Content Standard (OCS) allows textile manufacturers to make a verified claim regarding the organic fibre content of their textile products, by providing an independently certified system which verifies that raw fibre produced on farm meets the applicable organic production regulation in the country where the fibre is produced.<sup>18</sup>

### *Protecting the credibility of the organic textiles through the whole textile supply chain*

Several schemes limit and control the chemicals used in the processing and manufacturing of textiles and textile products.<sup>19</sup> There are also several schemes that ensure better conditions for workers involved in the manufacturing of clothing, for example by ensuring compliance with ILO norms in processing factories.<sup>20</sup> They are often used in conjunction with schemes that also protect the credibility of the organic fibre, since none of these schemes relates directly to maintaining the credibility of organic fibre.

The Global Organic Textile Standard (GOTS) is a comprehensive textile processing standard, based on the use of organic fibres from certified organic farms – the same way as the Naturland Textile Standard.<sup>21</sup> GOTS sets strict environmental and social standards<sup>22</sup> and is endorsed by IFOAM Organics International.<sup>23</sup> Certification to GOTS ensures that the credibility of the organic fibre is maintained throughout the value chain. Certification to GOTS includes a dual quality assurance: onsite inspection and product testing. The whole chain must be GOTS-certified to allow reference to GOTS and use of the GOTS logo on the final textile product.

### *Scope for improving credibility and traceability of organic textiles*

At the present time, it seems many businesses do not even use existing voluntary standards to support their organic fibre content claim. Furthermore, there is no regulatory requirement for mandatory certification.

From organic fibre production at farm level (certified in compliance with applicable organic farming regulation around the world) to organic processing, there is still scope for improving the traceability of the organic textile label. GOTS is leading the development of an organic textile database, which will allow exchange of comprehensive traceability information, including Scope and Transaction Certificates. This will considerably improve traceability and thus credibility of organic textile certification.

**Bringing together the two parts of the value chain, production and processing is the only way forward to ensure adequate consumer protection and provide a level playing field for operators.** In achieving it, the benefit of organic standards at the farm level in terms of organic farm practices and

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<sup>17</sup> These standards include Better Cotton Initiative (BCI), Cotton made in Africa (CmiA) and Fairtrade. BCI permits the use of GM seed and synthetic fertilisers, herbicides and pesticides. CmiA and Fairtrade both prohibit the use of GM seed, but both allow non-organic production.

<sup>18</sup> Conformity to the Textile Exchange OCS is independently verified by 10 organic certification bodies.

<sup>19</sup> E.g. Bluesign, Oeko-Tex, EU Eco-Label.

<sup>20</sup> e.g., SA 8000, ETI, Fair Trade standards.

<sup>21</sup> Naturland (2022), *Standards: Textiles*.

<sup>22</sup> GOTS (2020), *Global Organic Textile Standard, Version 6.0, March 2020*. See also the *Manual for Implementation of GOTS*.

<sup>23</sup> Conformity to the GOTS is independently verified and certified by 19 organic certification bodies (accredited by GOTS).

the prohibition of GM, synthetic fertilisers and pesticides will be matched by high environmental and social standards in organic processing and manufacturing of the textile products and clothing.

**In view of these considerations, an approach towards greater credibility, and a more holistic approach to farm/fibre growing/sourcing and textile processing sustainability is needed.**

## **Labour rights & workers health, consumer protection and greenwashing**

### *Labour rights*

Organic practices are based on the 4 principles of ecology, health, care, and fairness. GOTS fulfils the latter two principles with stringent social criteria, based on ILO key norms including prohibiting forced and child labour. GOTS ensures that workers in the textile supply chain are treated fairly. GOTS requires third-party certification which provides independent external verification.

### *Protection of worker health in fibre production*

Farm production of cotton fibre accounts for 16.1% of the world's insecticides, and 5.7% of total pesticides. This results in poisoning of people and the environment. 77 million agricultural workers suffer poisoning from pesticides each year and 83% of manufactured nitrogen fertilisers used on crops end up in the environment.<sup>24</sup> However, as organic cotton production bans the use of hazardous pesticides and fertilisers, these toxic chemicals are not released into the environment, consequently workers and the environment are not exposed to harm so human and environmental health are protected.

### *Consumer protection*

As it currently stands, consumers that purchase organic food know that the whole supply chain, from farm to finished product, is independently inspected, verified and certified according to a comprehensive standard that meets the requirements of the EU organic regulation. This is not the case for organic textiles and clothing. Consumers may be confused and incorrectly assume that the whole textile supply chain is covered (as with food), even though this is not necessarily the case. Protection of the use of the term "organic" in relation to textiles will ensure that consumers can have confidence that the whole textile supply chain, from on-farm production of organic fibre through all the processing stages, meets a coherent standard that covers environmental and social criteria.

### *Greenwashing*

The poor protection of the organic label for textiles allows to make unclear and ambiguous claims about a certain product being "organic" although the raw material may be conventional-natural or man-made, is not certified or has not undergone third party verification, for example. Other vague, imprecise terms such as "eco", "green" or "conscious" are also used to refer to the alleged sustainability qualities of certain products, without legally based substantiation. This threatens the organic textile market and aggravates the confusion of consumers who increasingly want to switch to more sustainable textiles<sup>25 26</sup>.

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<sup>24</sup> GOTS, Infographic, *Compare! From field to fashion*.

<sup>25</sup> The 2019/2020 Consumer Market Monitoring Survey found that 78% EU customers consider the environmental impact of products to be important.

<sup>26</sup> 82% of EU consumers think that green claims cannot be trusted, according to European Commission (2020), *Special Eurobarometer 501: Attitudes of European citizens towards the Environment*.

Without fixing the problem of these other greenwashing terms that also mislead consumers, protecting the use of the term “organic” would fix the problem of products being wrongfully labelled as “organic” and would allow for more consumer certainty.

Greenwashing is proportional to this consumer sensibility. Following a corporate screening in various business sectors including garment, cosmetics or household equipment, the Commission estimated in January 2021 that 42% of the analysed claims were “exaggerated, false or deceptive”.<sup>27</sup> Other have given a higher figure in the textile sector, at around 60%.<sup>28</sup>

At the same time, clothing production doubled from 2000 to 2019<sup>29</sup>, whilst the average lifecycle duration of clothes has plummeted<sup>30</sup>, with high rates of unsold items going into waste streams<sup>31</sup> resulting in very low rates of recycling.<sup>32</sup> In short, more and more clothes lasting less and less time are being produced, with an ever-greater environmental impact.

Greenwashing reinforces an unsustainable model over a growing organic market based on the reliability of claims. This reinforces the need for a clear standard with environmental and social criteria for finished textiles and clothing products. This standard shall be independently verified by approved certification bodies. This will ensure that vague and/or self-claims will no longer be possible and will benefit to businesses at several levels.

## Conclusion

The persistence of the distinction between legal regimes at EU level between organic food and drink and organic textiles reinforces the need to protect the credibility of the organic textile label.

The EU is increasingly active on issues of sustainability, transition to environmentally friendly business models, the protection of biodiversity and reaction to climate change. Consumers are also increasingly sensitive not only to these issues, but also to improving their consumption patterns. At the same time, organic textiles represent a credible and popular alternative, as well as a promising market.

IFOAM Organics Europe recommendations on how to protect the credibility of organic textiles are summarized in the table below.

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<sup>27</sup> European Commission (2021), Press release, *Screening of websites for ‘greenwashing: half of green claims lack evidence’*.

<sup>28</sup> Synthetics Anonymous (2021), *Fashion brands’ addiction to fossil fuels*.

<sup>29</sup> Ellen MacArthur Foundation (2021), *The trends and trailblazers creating a circular economy for fashion*.

<sup>30</sup> Ellen MacArthur Foundation (2017), *A new textiles economy: Redesigning fashion’s future*.

<sup>31</sup> *Ibid.*

<sup>32</sup> *Ibid.*

## IFOAM Organics Europe recommendations

Current situation at the EU level	IFOAM Organics Europe policy recommendations
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<sup>33</sup> Such as for example the best practices provided in the ISEAL Codes of Good Practice.