

ADVOCATING FOR NATURAL FIBRES IN THE ERA OF REGULATION

Olivier Segard

Group Managing Director, Segard Masurel

Vice President, International Wool Textile Organisation





About IWTO

WHAT WE DO

IWTO is the recognized global authority for standards in the wool textile industry. Since 1930, IWTO has represented the interests of the wool textile trade at a global level. Our worldwide membership encompasses the entire wool textile pipeline, from farm to retail. By facilitating research and development, wool textile education and knowledge sharing, IWTO ensures a sustainable future for wool.

OUR ACTIVITIES

- The annual IWTO Congress – a key event for the global wool textile industry
- Research key topics such as sustainability, sheep welfare, and biosecurity
- Work with governments, NGOs and other stakeholders on topics of joint concern
- Ensure a level playing field for wool in legislation, regulation, and policy
- Provide a platform for projects of common interest to the global wool industry
- License wool testing laboratories
- Publish wool trade standards, arbitration rules, and wool market statistics





OUR VISION

A sustainable, profitable, international industry working together for the future of wool.



OUR MISSION

To connect all parts of the wool supply chain in order to strengthen wool's credentials as the world's leading sustainable fibre.



OUR CORE VAUES

Global thinking
Transparency
Sustainability
Profitability



NETWORKING

We foster industry-wide relationships through IWTO working groups and events. Through our members-only platform, connecting with the wool community is easy.



STRATEGY

Our on-going industry forums review marketing, R&D and trends affecting the wool textile pipeline. By acting together, members can inspire new marketing strategies.



WOOL TRADE REGULATIONS

We maintain the global standards for wool testing methods and arbitration, and publish annual wool production & market statistics.



WOOL ADVOCACY

We promote the interests of the global wool trade with governments and international organisations.

Our Members

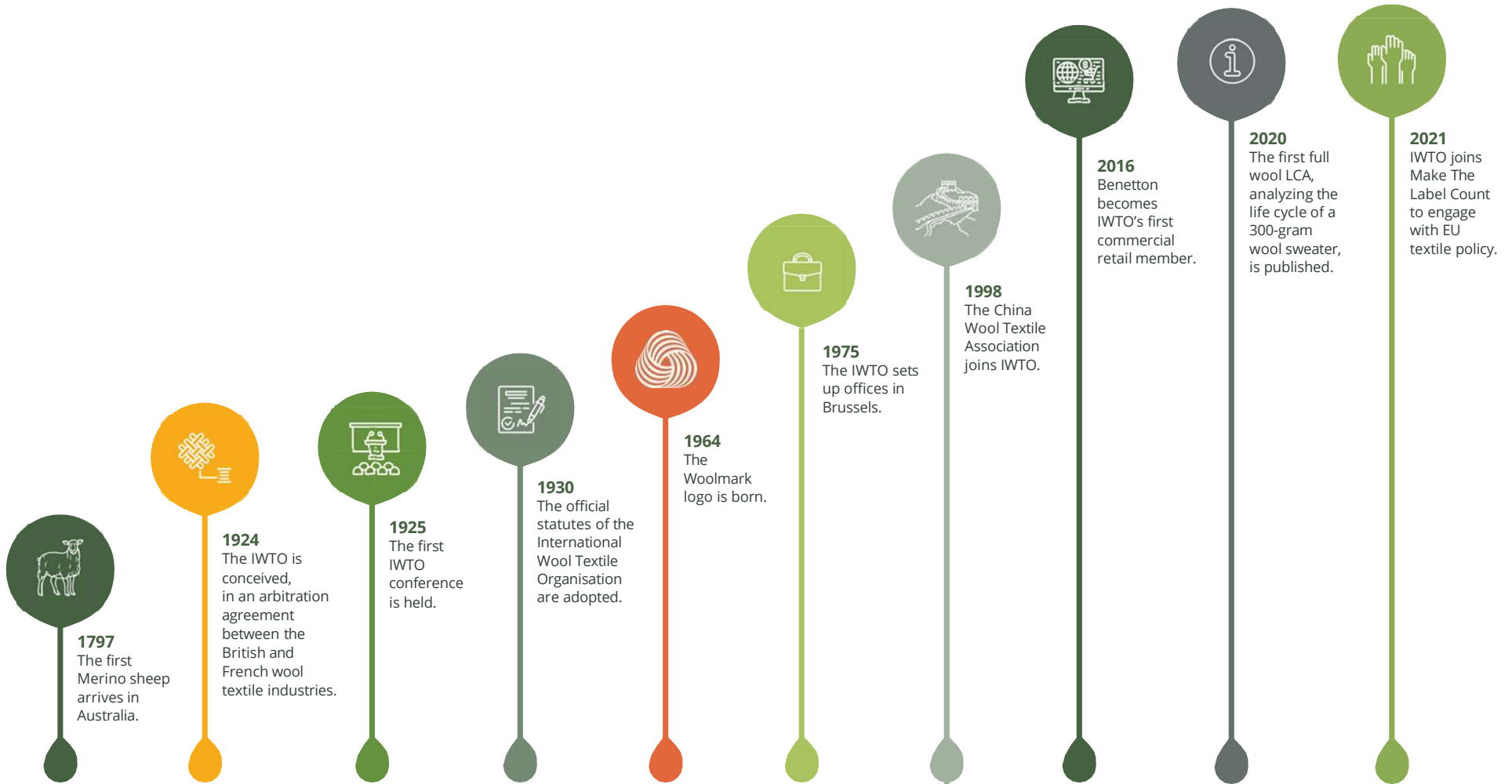
The IWTO's members represent all stages of the wool pipeline. Our 38 members can be found in 27 countries, growing and producing wool for clothing, interiors, handknitting yarns, industrial applications and more. By coming together, the wool industry can create a more sustainable industry focused on ensuring a viable future for wool and promoting the wool fibre's value. Wool growers, processors, brokers, spinners, weavers, brands and retailers – all have a place at the global table that is the IWTO.



IWTO

International Wool Textile Organisation





About Make the Label Count Campaign

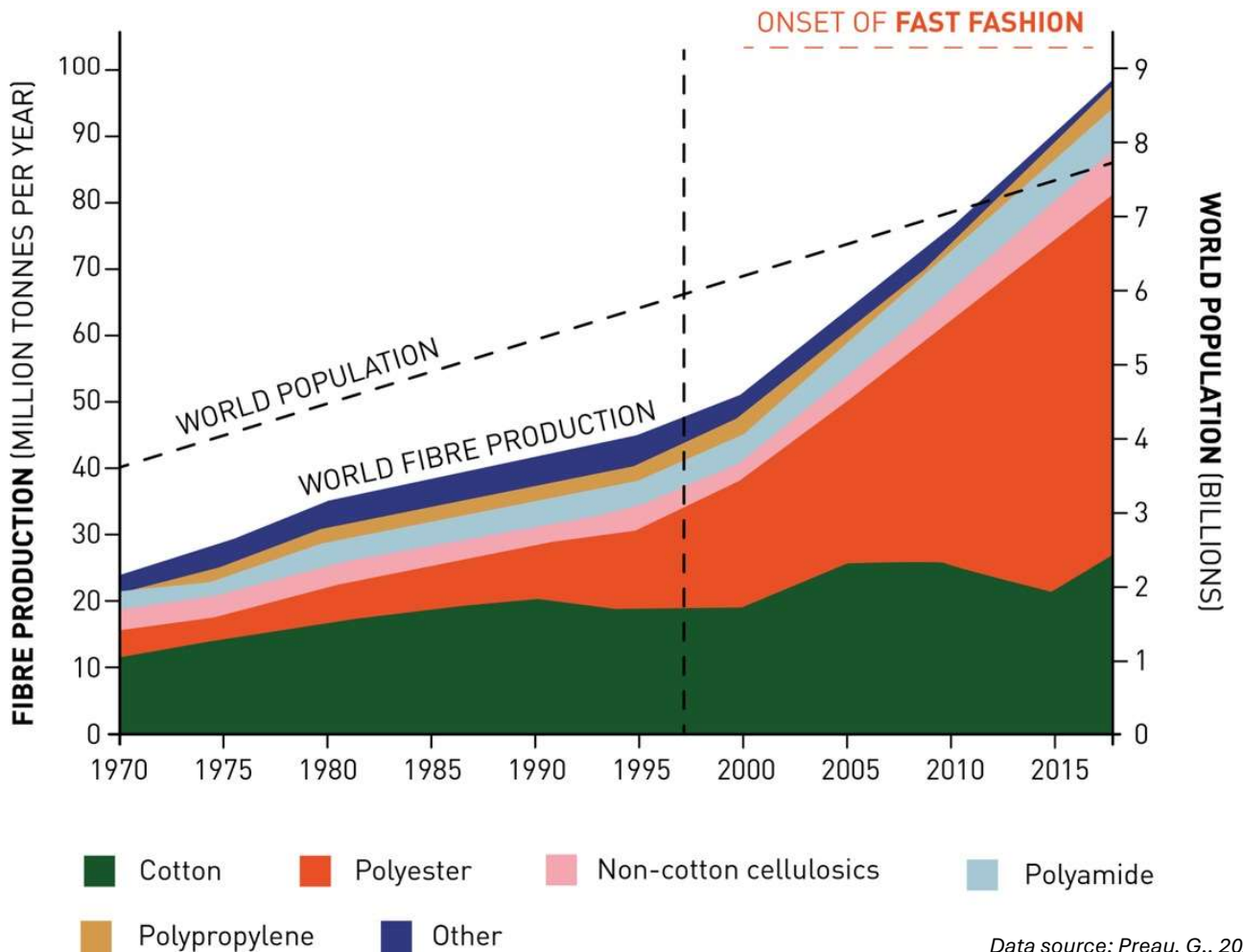


MAKE THE LABEL COUNT



WOULD YOU TRUST A SUSTAINABILITY CLAIM THAT DID NOT ACCOUNT FOR MICROPLASTIC POLLUTION?

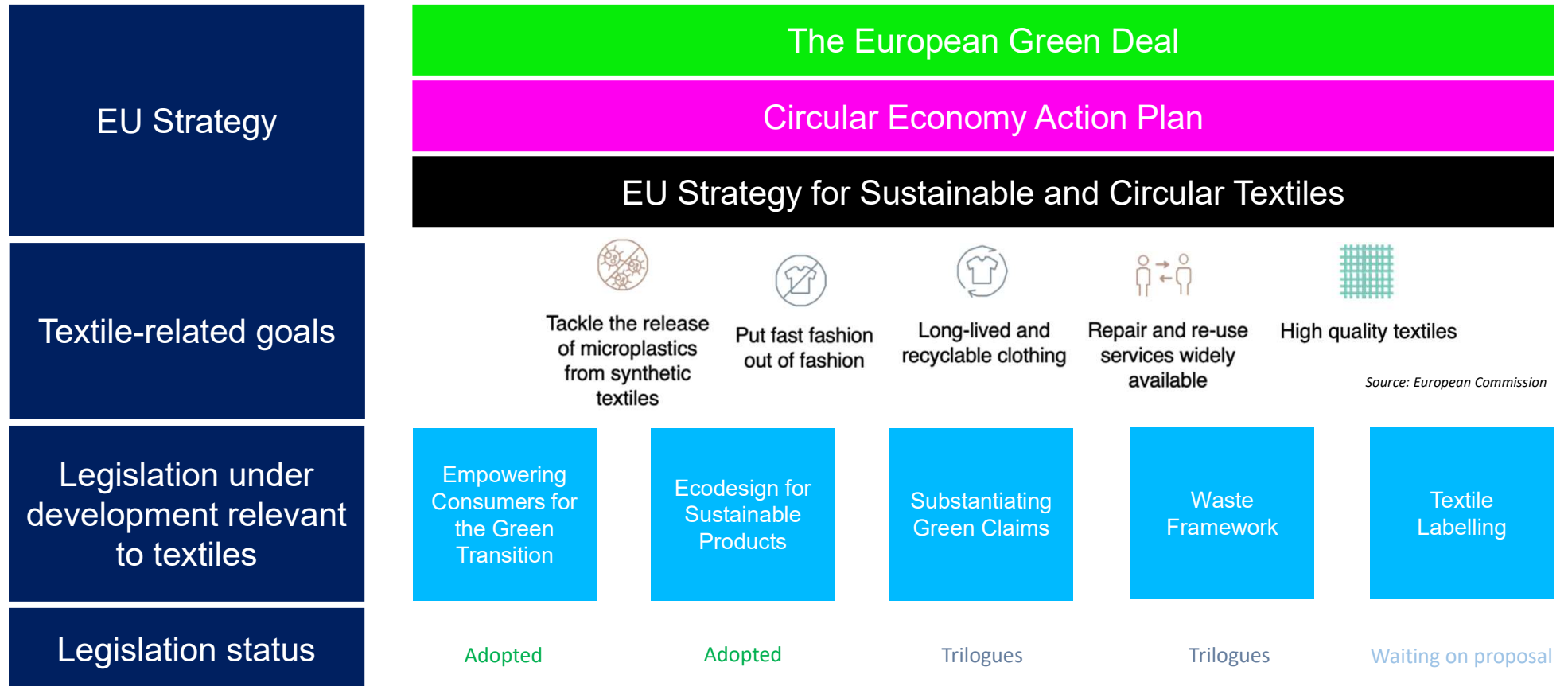
Over- production driving legislative action



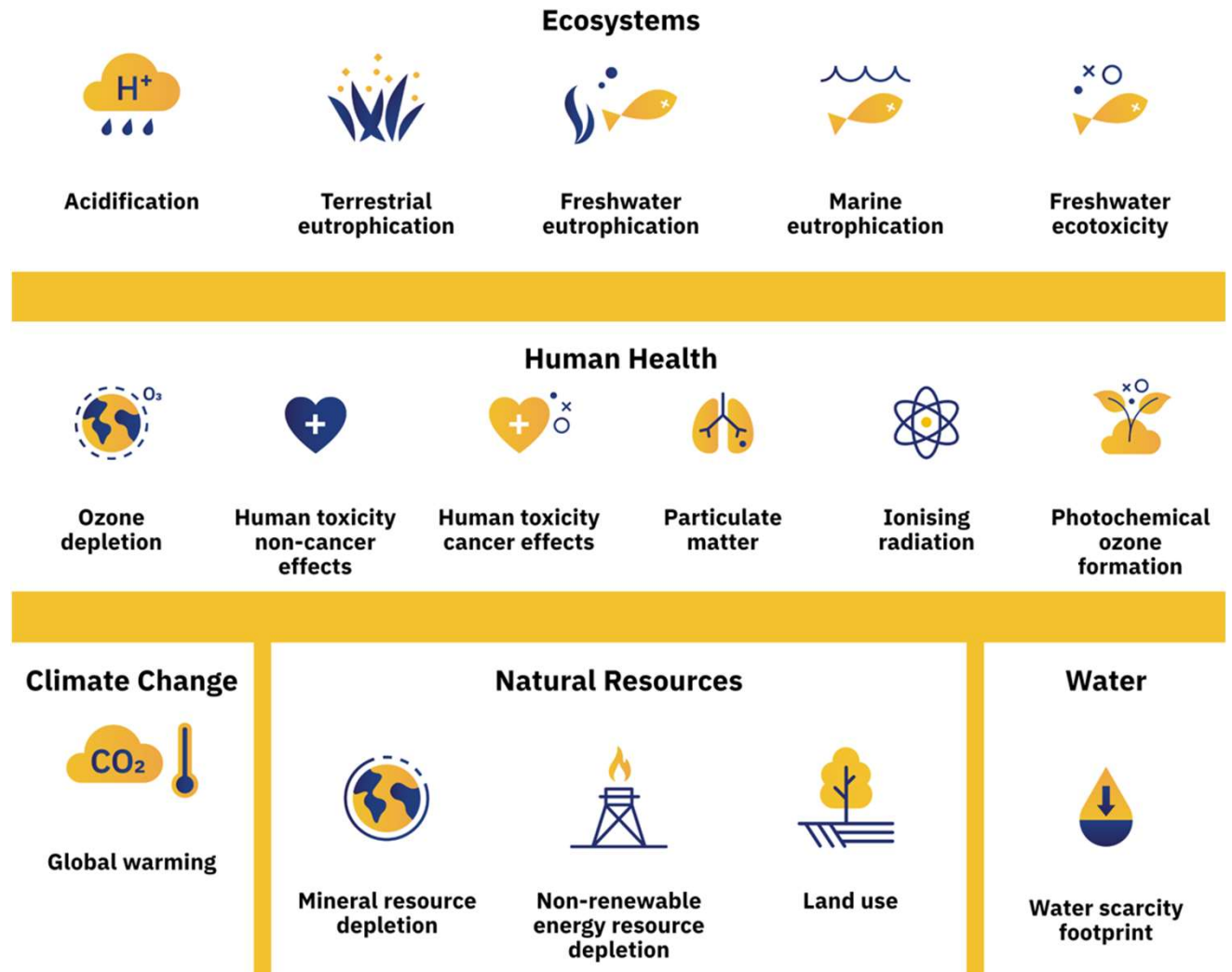
Data source: Preau, G., 2020

Image source: Getty

EU Sustainability Legislation for Textiles



Explaining Product Environmental Footprint (PEF)



PEF overlooks key impacts of synthetics

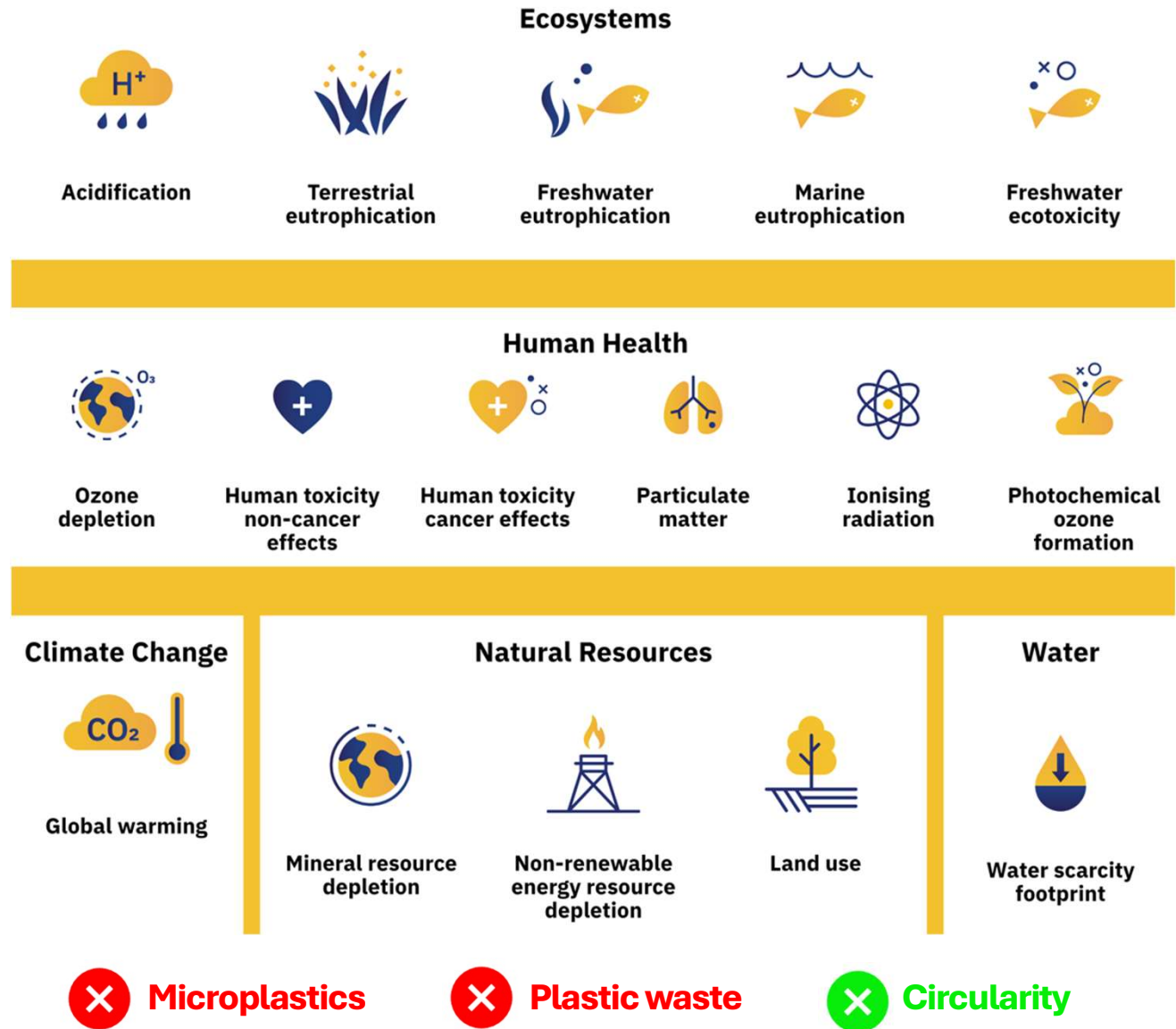
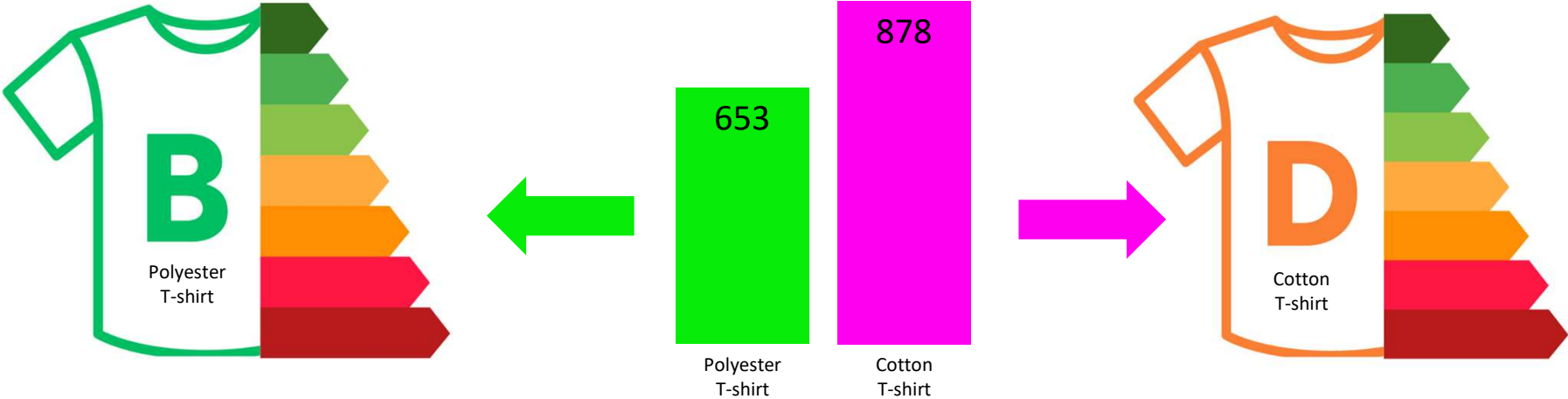


Image source: PEFAppearFootwear website

PEF IN PRACTICE

PEF Score in milli-points



SHORTCOMINGS OF PEF

WHAT DOES PEF CURRENTLY FAIL TO COMPREHENSIVELY INCLUDE?

 FULL IMPACT OF FOSSIL FUELS	 PRODUCTION PRACTICES	 RENEWABILITY AND BIODEGRADABILITY
 DURATION OF SERVICE LIFE	 SOCIAL IMPACT	 MICROPLASTIC POLLUTION

- Does not accurately reflect the latest environmental science
- **Fails to consider key impacts of synthetic fibres**
- Does not account for the formation of the oil and natural gas, **omits the inherently circular attributes of wool**
- **Make the Label Count Campaign** launched in 2021



46 coalition members
working to ensure
sustainability claims on
textiles in the EU are fair
and credible



OBJECTIVES OF MTLC

- Raise awareness about the shortcomings of PEF
- Provide solutions on how to improve PEF
- Asking European policy makers, to amend the PEF methodology before implementation within legislation.

“

Omitting microplastics from the PEF system effectively assigns zero impacts to this emission, which risks unintentionally guiding consumers towards plastic products and fibres, further increasing microplastic emissions.

”



**MAKE THE
LABEL COUNT**

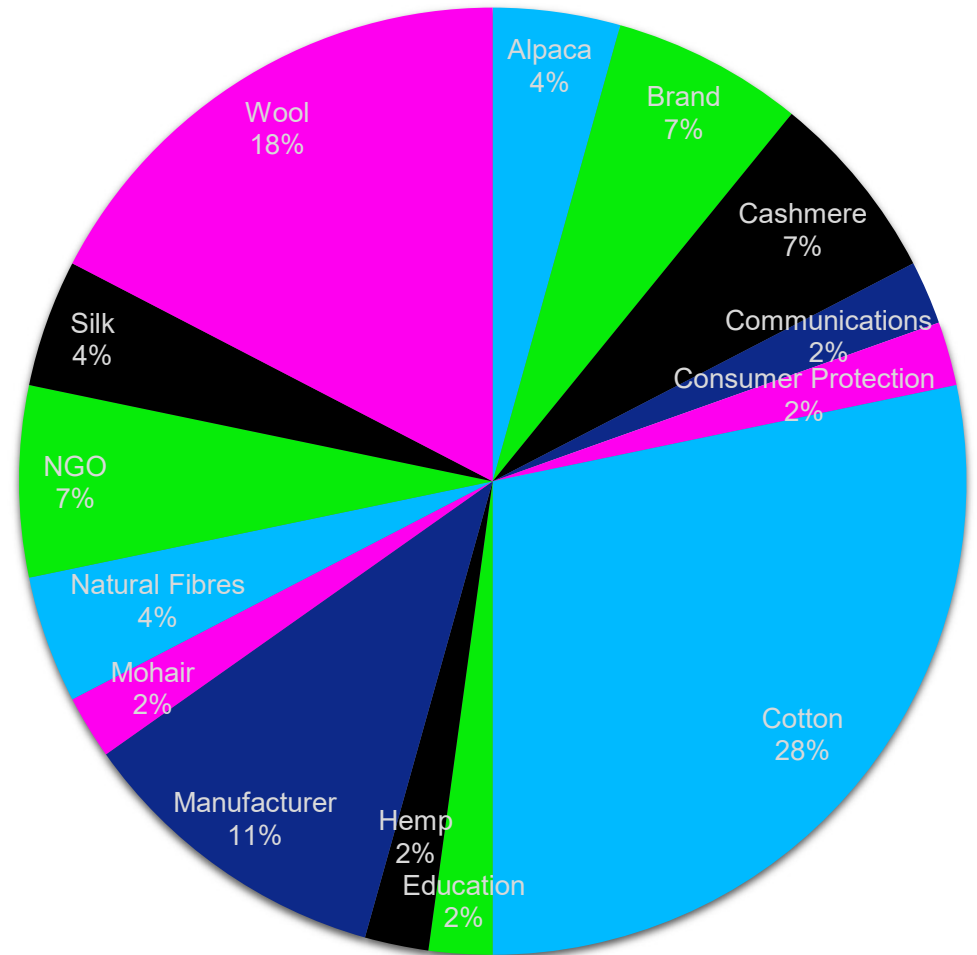
#MAKETHELABELCOUNT

COALITION OVERVIEW

Coalition Members from Cotton

- AFCOT
- ANEA
- Bremer Baumwollbörse
- Centro Algodonero Nacional
- Cotton Australia
- Cotton Egypt Association
- ECOM Trading
- International Cotton Association
- ICA Bremen
- National Cotton Council of America
- The Sourcery
- U.S. Cotton Trust Protocol

Coalition members by industry



CAMPAIGN TEAM & GOVERNANCE



CAMPAIGN SPOKESPERSON

Dalena White

Secretary General

International Wool Textile Organisation (IWTO)



CAMPAIGN SPOKESPERSON

Elke Hortmeyer

Head of Economic Research & Communication

Bremen Cotton Exchange



CAMPAIGN MANAGER

Elisabeth van Delden

Sustainability Manager Europe

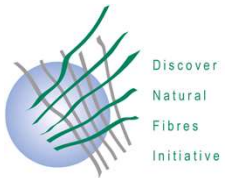
Australian Wool Innovation / The Woolmark Company

COALITION MEMORANDUM OF UNDERSTANDING (MOU)

An MOU governs the MTLC Coalition. All Coalition members are invited to be active in the campaign to the extent that they're able to contribute.

CAMPAIGN FUNDING

Funders over time since 2021



CAMPAIGN AIM

The aim of the Make the Label Count (MTC) campaign is to work with European policy makers to improve the PEF methodology

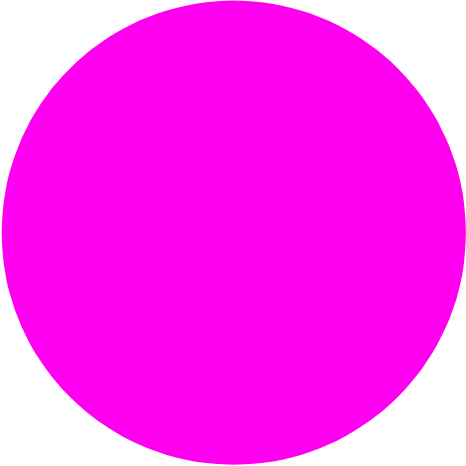
CAMPAIGN ACTIVITIES

- Meetings with policy makers
- Drafting amendments to EU legislation
- Organising events such as farm visit
- Drafting open letters to the Commission and Council as well as written opinion editorials



INDUSTRY IMPACT

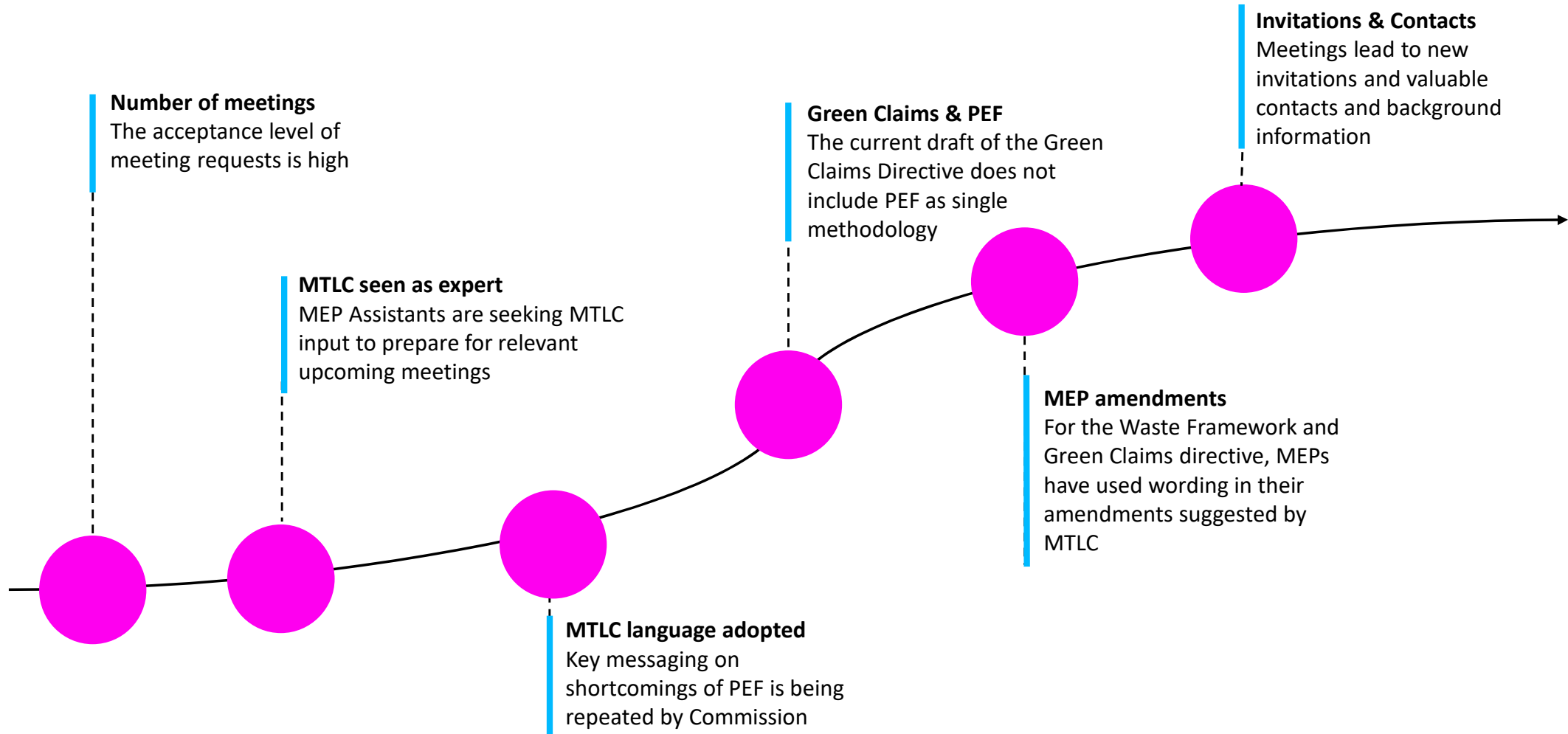
SYNTHETICS
VOICE



JOINING OUR
VOICES



PROGRESS



PROGRESS

The MTLC network drafted several open letter to the Council of the EU which also got picked-up by media.

News

Farmer livelihoods 'at risk' on Green Claims Directive PEF focus

A global collective of over 800 apparel and textile industry stakeholders have written a letter to the Council of the European Union voicing strong concerns about the proposed Green Claims Directive and its reliance on the Product Environmental Footprint (PEF) methodology, which they believe "unfairly" favours synthetic materials over natural fibres, putting farm



SUSTAINABILITY

Is the EU about to give synthetic fibre makers a competitive advantage?

An EU Green Claims Directive proposed by the European Commission intended to stop greenwashing, may play to the advantage of producers of synthetic fibres, say farmers. There's a great deal at stake.

BY SOPHIE BENSON
June 20, 2024



Fashion must protect our farmers, our land and our communities.

In an unprecedented move, hundreds of thousands of farmers from all over the world send urgent appeal to the European Council to protect their livelihoods and natural fibres from unjust fashion-focused policies favouring fossil fuel fibres.



Joint letter on urgent concerns and recommendations on the Green Claims Directive
Brussels, 6 June 2024

We, the undersigned, represent a coalition of natural fibre organisations, environmental non-governmental organisations and researchers committed to sustainability, consumer protection, and climate action. The signatories of this letter appreciate the Council's efforts to strengthen the Green Claims Directive, which aims to prevent greenwashing, a goal that the signatories of this letter fully support.

We write to express our collective concerns regarding the Council's current position on the Green Claims Directive regarding references to the use of the Product Environmental Footprint (PEF) as the methodology to substantiate claims.

It is imperative to improve the PEF methodology to ensure it accurately reflects the environmental impacts of the products in question. Until the PEF and PEFCR are improved, they should not be used to substantiate Green Claims as they risk further greenwashing.

We urge the Council to refrain from:

- (1) recommending the use of the PEF or PEFCR, and
- (2) presuming that requirements for substantiation are met when using PEFCR.

PEF is an incomplete tool for substantiation. We appreciate the Council recognising some of the shortcomings of the PEF method in recital 32. However, we are concerned about the Council's decision to recommend the incorporation of PEF in recitals 17, 24 and 32 as a tool for substantiating claims. The current PEF and subsequent Category Rules are incomplete and risk misleading well-intended consumers and becoming a greenwashing tool that the legislation is aiming to avoid. The PEFCR for apparel and footwear, for example, considerably downplay the benefits of using renewable, biodegradable materials like natural fibres and score fossil-fuel based materials like polyester better. The reason for this being fundamental flaws in the PEF methodology that need to be improved.

The PEF may be a valid methodology when applied to manufactured products, however it gives inaccurate results when it is applied to food and agricultural products, where the most intensively-produced product, the most environmentally friendly it tends to be according to PEF. It subsequently disregards the benefits of extensive and sustainable methods of production. For natural fibres, this is exacerbated even further by the PEFCR for apparel and footwear which assumes that the most durable products will have the longest life, despite the fact that clothing made from fibres with the lowest physical strength have the longest life in our wardrobes.

Dear Council of the European Union,

We are writing to you as a global collective of farmers highly concerned about the impact of the Green Claims Directive regarding references of the Product Environmental Footprint (PEF) methodology to substantiate claims.

10th June 2024

Dear Council of the European Union,

We write to you in our capacity as researchers, concerned consumers, farmers, textile companies throughout the value chain, and NGOs regarding the European Commission's proposal on the Green Claims Directive (GCD), and the recent integration of references to the Product Environmental Footprint (PEF) in the text prepared for the Council for the European Union for June 17th 2024.

We welcome that the Council has articulated some reservations regarding the integration of PEF (i.e. recital 32) into GCD. However, as we will seek to demonstrate, references to the PEFCR for apparel and footwear as a preferred method is, as of June 2024, both premature and misleading.

In its current iteration, the PEFCR focuses overwhelmingly on technical durability, and fails to include other key environmental indicators related to Duration of Service (DoS) or, more simply put, the "lifetime" of products and how we use and wear them. As prolonged wear is the most effective means by which to reduce fashion's environmental impact, PEF is essential in assessing true and fair product sustainability and impact.

ncil is endorsing PEF or PE
The PEF methodology
representing natural fil
risk of injustice to farm

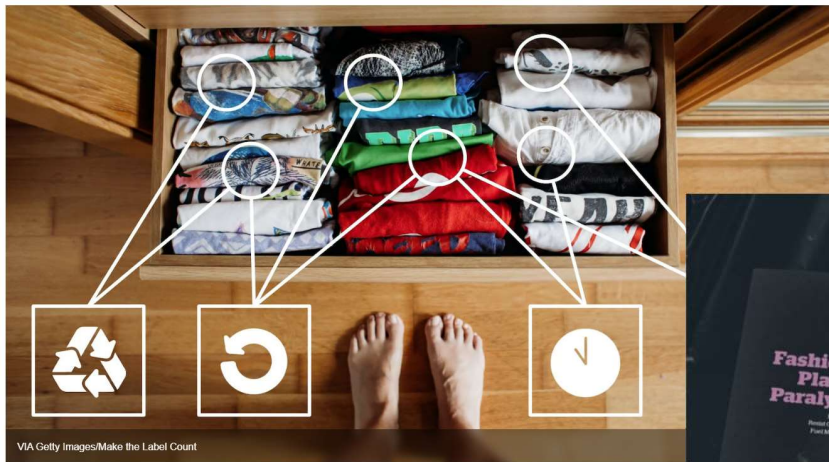
PROGRESS

The MTLC coalition and its network raise awareness on topics related to the campaign.

SPONSORED CONTENT FROM MAKE THE LABEL COUNT

Putting fast fashion out of fashion

The EU is leading the global pathway towards sustainable clothing... but a course correction is needed.



VIA Getty Images/Make the Label Count

BY DALENA WHITE, SPOKESPERSON, MAKE THE LABEL COUNT
NOVEMBER 8, 2022 | 5:00 AM CET



Fashion brands pause use of sustainability index tool over greenwashing claims

H&M has suspended its use of product labelling tool, The Higg Materials Sustainability Index



Shoppers could go onto H&M's website to check the environmental impact of 655 of its garments, as rated by the Higg Materials Sustainability Index, before it was paused this week. Photograph: Islandstock/Alamy

An alliance of major fashion brands has announced that it is pausing its use of a tool to measure garments' sustainability after critics described it as [greenwashing](#).

CAMPAIGN TIMELINE

OCTOBER 2021

Officially launched the MTLC campaign

MAY 2022

Submitted response to EU public consultation on Microplastics

OCTOBER 2022

Farm visit with EU legislators to Knitwit Stable in the Netherlands

JUNE 2023

PEF Technical Briefing with MEPs

November 2023

Amendments offered to MEPs on the Green Claims and Waste Framework Directives

JUNE 2024

Joint letter to Council of the EU attachés on Green Claims Directive

EU legislators outreach:
436 emails & 66 meetings

JANUARY 2022

Supported a joint MEP letter distributed to the European Commission

MAY 2022

Publication of white paper

MARCH 2023

Submitted response to public consultation on the public consultation on ESPR

SEPTEMBER 2023

Submitted response to the call for evidence on the European Commission's Textile Labelling Rules revision

APRIL 2024

Activated network to submit response to PEFCR public consultation

Ongoing involvement in the PEF Technical Secretariat via the IWTO Wool LCA Technical Working Group.

SIX-MONTH OUTLOOK

Brussels dynamics and the need to maintain campaign momentum:

PEFCR fundamentally flawed, governance question around Technical Secretariat

Over 60% of MEPs are newcomers following EU election

Some Member States are in favor of PEF

New Rapporteurs on Parliament Committees responsible for Green Claims and Waste Framework Directive

Secondary legislation- "Delegated Acts" - require more technical expertise and engagement

Increased lobbying by Fast Fashion

Climate policies losing momentum

Hungary holds EU presidency between July – December 2024

Main focus for MTLC: Green Claims Directive

- Over the next 6 months the MTLC team will advocate policy makers on the Green Claims Directive
- Our ask will be to NOT recommend the use of the PEF or PEFCR, and to NOT presume that requirements for substantiation are met when using PEFCRs.



EU Green Claims Directive:

- Common criteria on how companies should substantiate environmental claims

Opportunity Ecobalyse

- The EU's Green Claims Directive allows for other credible schemes to operate in parallel with PEF.
- Ecobalyse could be the 'better' credible alternative to PEF
- Important to engage with and improve Ecobalyse



WOOL & COTTON HAVE MANY TOPICS IN COMMON TO ADVOCATE FOR



Accounting for
sustainable
farming & social
impact



Image source: Cotton RDC, Getty



**MAKE
THE LABEL
COUNT**