JOINT CONTRIBUTION

as part of the TRIS notification procedure on the French Draft law aimed at reducing the environmental impact of the textile industry

En Mode Climat and **Impact France** would like to emphasize:

- the **consistency** of the draft law on the textile industry with European law and in particular with the recent **revision of the waste framework directive** ;

- The urgency for **action to safeguard the European textile industry** and the appropriateness of the provisions of the proposed draft law ;

and therefore call on the European Commission to allow the adoption, as it stands, of the French draft law aimed at reducing the environmental impact of textiles.

THE CHALLENGES FACED BY THE EUROPEAN TEXTILE INDUSTRY

1) A situation of environmental and economic crisis

2) The “benefit of wrongdoing*” that affects both European businesses and consumers

A LAW ADAPTED AND COMPLIANT WITH EUROPEAN LAW

1) The proposed law is part of the European Textile Strategy and the provisions of the revised Waste Framework Directive.

2) The Polluter-Pays Principle is strengthened and applied more fairly

ABOUT EN MODE CLIMAT

ABOUT IMPACT FRANCE

THE CHALLENGES FACED BY THE EUROPEAN TEXTILE INDUSTRY

1) A situation of environmental and economic crisis

The Draft law aimed at reducing the environmental impact of the textile industry responds to serious environmental issues, but also to an **economic and social crisis situation**, for the European textile sector.

On the economic level, we observe:

- Upstream, an acceleration of the **deindustrialization** with the risk of losing key players in the textile manufacturing chain: spinning mills, finishers, dyers.
- Downstream, several distribution segments affected by a significant number of **bankruptcies** and layoff plans, from mid-range to premium brands (in France: Camaïeu, Devianne, San Marina, Esprit, Princesse Tam Tam, etc.) and ethical brands, that are contractors for “made in France” and “made in Europe” products
- A remarkably high **trade deficit**: for France, -8.5 billion euros for clothing textiles in 2023[1]

The evolution of employment and territorial dynamics are worrying:

- **Massive job destruction** linked to deindustrialization (which affects certain regions more severely), to competition from online sales platforms for clothing sales and, more generally, to the race for low prices, which do not allow jobs in sales to be maintained.
- **Devitalization of city centers** with the disappearance of independent stores and several brands historically present in medium-sized towns:

[1]Customs, 2023

Camaïeu (520 stores closed), André (159), Celio (102), Comptoir des Cotonniers (28), Esprit (100), Pimkie (64), Naf Naf (25), etc.
- A **lower economic contribution** to the territories, linked to the shift of part of the market towards online platforms and the disappearance of local economic players in the textile industry and trade.

Finally, the environmental issues linked to the textile sector have been widely documented, particularly by European institutions:

- **An exponential increase in production** and consumption: 16 kg per year per person are consumed by European citizens, a quantity which far exceeds the waste management capacity in the EU.
- **The polyester challenge**: its production has exploded (3 million tonnes in 1975 ⇒ 80 million tonnes in 2025[2]) and contributes massively to global plastic pollution. Synthetic fibers are particularly used by fast fashion brands.
- **Less than 1% of clothing items** are recycled into new clothing. National circular economy infrastructures (sorting, reuse, recycling) are not able to absorb the quantities produced.

2) The “benefit of wrongdoing*” that affects both European businesses and consumers

** In French, the “prime au vice”*

The above-mentioned impacts are to be linked to the development of fast fashion and, more recently, ultra-fast fashion, that have profoundly changed the economic landscape of the textile sector.

The negative consequences are cumulative, for the population as well as for businesses, particularly those that strive to produce products with less environmental impact in France or Europe.

[2] Textile Exchange Market Report

The **citizens** are in favor of regulating the sector[3]and many Europeans **companies** call for urgent action: through petitions, tribunes or public calls in the media.

Along with them, we denounce the use of ultra-fast product renewal models and mass production at ridiculously low costs. This unfair competition is forcing independent retailers, responsible brands and platforms, and French brands into an unsustainable price war, sacrificing their margins, and even leading to their disappearance. All sectors of the textile sector are affected, from fiber production to major retail chains.

COMPLIANCE AND ENFORCEMENT OF EUROPEAN LAW

1) The proposed law builds upon the European Textile Strategy and the revised Waste Framework Directive.

The Textile Strategy adopted in 2023 very clearly states the objective of the European Union to **regulate fast fashion practices** and to **strengthen the Polluter Pays Principle** regarding textile waste.
The revision of the Waste Framework Directive, finally validated by the European Parliament on September 9th 2025, clarifies the application of this Strategy, particularly in regard to the mechanism of extended producer responsibility.

The text recalls the **goals** of this mechanism:
(31) "The purpose of the extended producer responsibility for textile, textile-related and footwear products is to ensure a high level of environmental and health protection in the Union (...)

[3]See in particular this petition:https://action.wemove.eu/sign/2025-04-score-fast-fashion-petition-FR

It also makes it very clear that fast fashion business practices can lead to **ecomodulations**, relating in particular to the **two criteria used by France to award penalties** through the sustainability coefficient (article 2 paragraph 15 of the Draft Law):

> (40) *Industrial and commercial practices, such as ultra-fast and fast fashion, influence the length of use of the product and the likelihood of a product to become waste because of aspects not necessarily linked to its design, and are often based on market segmentation. These practices may lead to the premature discarding of the product before it reaches the end of its potential lifetime resulting in an overconsumption of textile products and, consequently, an overgeneration of waste textile. To characterise these practices and allow for eco-modulation of extended producer responsibility fees, Member States could consider criteria such as the width of the product range understood as the number of product references offered for sale by a producer, with defined thresholds per market segment, or the frequency of offers, understood as the number of references per market segment offered for sale by a producer in a given period, or repair incentives, understood as the likelihood of the product to be repaired"*

By thus inaugurating the provisions of the revised framework directive, the French draft law offers the possibility to other Member States and to the services of the European Commission to draw, in the long term, valuable feedback from it.

2) The Polluter-Pays Principle is strengthened and more fairly applied

Article 2 of the French Draft law allows for a **more precise application of the Polluter-Pays principle** under the extended producer responsibility mechanism.

Indeed, the use of **stronger ecomodulations** will allow to **truly distinguish the respective responsibilities of different categories of producers** and their **financial repercussions**.

→ Producers using commercial practices that encourage overconsumption actually induce **increased expenses** in the management of textile waste. It is therefore fair that they should be affected by heavy penalties. A simple change in their business strategy can allow them to avoid them.

→ Conversely, producers who internalize environmental objectives and prohibit incentives for overconsumption contribute to **limit the costs covered** within the framework of the EPR, it is therefore logical that their efforts are supported through **premiums**.

This application of the Polluter-Pays Principle is therefore better targeted, fairer, and more proportionate than the fees currently applied in the French textile EPR scheme, which offer little incentive to producers.

ABOUT EN MODE CLIMAT

The En Mode Climat association brings together more than **500 companies** (ethical brands, French manufacturers) and other players in the textile industry, who are calling for more restrictive legislation for the sector, in particular to help achieve the climate objectives of the Paris Agreement.

En Mode Climat brings proposals to tackle textile **overproduction**, linked to the consumption incentives of fast fashion players: ridiculous prices, frantic renewal of collections, promotions that are too strong or too frequent... The coalition also aims to promote the **relocation** of textile industries in France or in Europe, in countries where the energies used emit less greenhouse gases.

To find out more:www.enmodeclimat.fr
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ABOUT IMPACT FRANCE

Born from the merger of Mouves and Tech for Good France in 2020, the Impact France Movement is the first movement of French entrepreneurs and business leaders committed to the ecological and social transition.

It brings together **30,000 companies** to build a robust economy of common interest.

To find out more: www.impactfrance.eco
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