INTERNATIONAL WOOL TEXTILE ORGANISATION (IWTO) CONTRIBUTION TO THE DECREE RELATING TO SIGNAGE AND THE METHODOLOGY FOR CALCULATING THE ENVIRONMENTAL COST OF TEXTILE CLOTHING PRODUCTS

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IWTO acknowledges and supports the improvements to the PEF framework built into the Ecobalyse environmental cost calculator for clothing to account for the preservation of biodiversity and water resources and the fight against fast fashion.

However, IWTO highlights significant concerns yet to be overcome before this framework can provide a level playing field for natural fibres, such as wool. For each concern we propose a potential solution to address these shortcomings.

Concern	The current Ecobalyse calculator does not address fast-fashion as effectively as previous iterations.
Context	Whilst the Ecobalyse calculator can be lauded for attempting to tackle fast-fashion by considering the size of retailers and their ranges it falls short in terms of the other fast fashion indicators such as the number of collections per year, time on the retail shelf, retail price relative to the average and the levels of discounting. Price has been shown to be a major determinant of the 'perceived value' consumers have for their clothing - and consequently how long they keep that clothing in use.
A better way	Revert to the earlier version of Ecobalyse which addressed the above issues more effectively. Using the ratio of product-price to the average-product-price as an additional Coeff Durabilitie attribute would allow the indicator to more directly account for price.

Concern	Published science confirms that products made from natural raw materials are unfairly disadvantaged by the **wider system boundary** applied to them.
Context	Ecobalyse assesses cradle-to-grave impacts but the meaning of “cradle” differs based on raw material type. For natural fibres, the impacts of fibre formation are fully accounted (i.e. the farm's greenhouse gas emissions, land area, water use, fuel use, etc) but for fossil fuel-based products the impacts of forming oil are not counted - only the impacts of extracting the oil and onward are counted. With the majority of natural fibre product impacts occurring during the fibre formation stage, the omission of comparable data for synthetic fibres magnifies the inequity between natural and fossil fuel-based textiles. Ecobalyse assesses impacts across the product’s entire lifecycle from cradle-to-grave. However, the meaning of “cradle” differs based on raw material type. For natural fibres, the impacts of fibre formation are fully accounted, including the farm's greenhouse gas emissions, land area, water use, fuel use, and more. But for fossil fuel-based products, the impacts of forming oil are not counted - only the impacts from the extraction phase onward are counted. This methodology entirely excludes the processes that formed these resources, thereby granting synthetic fibres an unjustified advantage.

A better way	LCA methodology correctly omits the impacts of forming oil because they occurred millions of years ago and are not relevant to today's environment, however International standard IS0 14044 specifies that "the appropriateness of the system boundary shall be considered as part of the interpretation process". But this is not yet occurring. Ecobalyse should be updated to comply with the IS0 14044. The inclusion of a circularity indicator, capable of compensating for the system boundary difference between renewable and non-renewable raw materials could enable more equitable comparisons (see point below on Circular Footprint Formula).
Reference	https://www.mdpi.com/2071-1050/14/24/16683

Concern	The overriding focus on assessing environmental harm, inherent in environmental cost indicators, **ignores positive environmental impacts from farming natural fibres**, biasing against them.
Context	Well managed production of natural fibres captures and sequesters atmospheric carbon, enhancing soil health and farm resilience. Regenerative farming practices foster biodiversity by maintaining complex ecosystems on the farm. These fibres are not merely renewable, their production actively contributes ecosystem services that mitigate climate change, prevent land degradation, and support a healthier and more diverse environment.
A better way	Recital 32 of the Green Claim Directive states: "As regards foods and agricultural products, biodiversity and nature protection, as well as farming practices, including positive externalities of extensive farming and animal welfare, should, for example, also be integrated before the adoption of the PEFCR" Environmental cost calculators such as Ecobalyse, cannot provide a level playing field across textiles until the environmental positives are counted. Unwarranted collateral damage would be done to natural fibre industries – which of course is not aligned with the intent of French and EU environmental policy.

Concern	Ecobalyse should more fully align with the Circular Economy Action Plan goals by widening the currently **narrow view of circularity.**
Context	The Circular Footprint Formula (CFF) within Ecobalyse attempts to reward products made with recycled raw materials but largely overlooks the benefits of products made from materials with inherently circular attributes – including, renewability, biodegradability and recyclability. Sustainability in the long term is not possible unless the nutrients in products are ultimately returned to the soil for use again. Fossil fuel-based products do not biodegrade so do not return their nutrients to the soil. Fossil-based materials are not renewable and will eventually run out. These attributes must be heavily weighted (relative to other impacts) to recognise their vital role in sustainability.
A better way	The problem of overlooking the vital importance of renewability and biodegradability could be addressed by using a meaningful circularity indicator - such as the Ellen MacArthur Foundation's

	Material Circularity Index or WBSCD's Circular Transition Indicator (CTI). This would significantly increase Ecobalyse's alignment with delivery of the Circular Economy Action Plan.
Reference	Using LCA and Circularity Indicators to Measure the Sustainability of Textiles https://www.makethelabelcount.org/ Delivering EU environmental policy through fair comparisons

Concern	Admirable EU environmental goals, including tackling fast fashion and addressing microplastic release cannot be delivered if **key impacts of plastics are omitted.**
Context	The increased availability of cheap synthetic clothing has been shown to be a key enabler of fast fashion, yet major environmental impacts of synthetics are either overlooked or only partially accounted for in Ecobalyse. • Plastic waste is overlooked • Microplastic release has been included as a weighted metric but: ➢ All life stages other than the use phase have been ignored, overlooking approximately 98% of microplastic release ➢ Microplastics have been confounded with natural microfibres, so have reduced influence on the environmental score.
A better way	A persistent solid waste impact category should be included in Ecobalyse, with the metric quantified by the percentage of a product expected to be landfilled. The precautionary principle should be applied to microplastic accounting given the rapidly growing body of evidence of microplastic harm to both the environment and human health. ➢ Microplastic release should be accounted for across all life stages: utilising existing science and expert opinion where this is unavailable. ➢ Microplastic release should not be confounded with natural microfibres with the latter worn over eons without a buildup of fibres in the environment or our bodies.
Reference	The global apparel industry is a significant yet overlooked source of plastic leakage | Nature Communications Using LCA and Circularity Indicators to Measure the Sustainability of Textiles https://www.makethelabelcount.org/ Delivering EU environmental policy through fair comparisons The Rise of Lifecycle Analysis and the Fall of Sustainability: Berlin 202030 — Veronica Bates Kassatly The environmental Price of Fast Fashion) Research we are watching at Harvard University Leading medics warn of 'profound public health crisis' caused by plastics | The Independent.

Concern	Favouring plastics by **overweighting the importance of physical durability** testing in future evolutions of the calculator
Context	Ecobalyse's deferral of including physical durability testing as a proxy for product lifespan reflects awareness of and sensitivity to this concern. However, we understand it may yet be included. Garments need to be strong enough to provide a long use phase, but evidence linking superior strength to increased textile longevity is lacking. Clear evidence is available from waste audits showing a significant proportion of garments entering waste streams have no physical defects.

	Synthetic fibre products consistently outperform natural fibre products in most physical durability tests due to the high tensile properties of fossil fuel-based textiles (IWTO Position Paper 1). However, the strength of a garment is not the dominating factor determining whether consumers keep it. Evidence confirms that consumers keep/discard garments based on perceived value, quality and fit. Additionally, there is no robust or evidence-based way to weight and amalgamate the different physical test results together with other attributes into a single score.
A better way	A more robust measure of lifespan will be possible following implementation of the Digital Product Passport (DPP). DPP-derived data from waste collection facilities can report the average lifespan of clothing made by brands and this evidence-based measure can then inform the environmental score for that brand's current clothing (in the same product subcategory). The brand's score would be progressively updated as its newer products come onto the market and gradually made their way to waste collection facilities. Such a system would be: credible and evidence-based; low cost; present no barriers to SME involvement; motivate brands to produce long-lived clothing; and also deliver Green Deal strategies like putting fast fashion out of fashion. In short, this retrospective end-of-life tool would be much more effective than attempting to 'guestimate' clothing lifespan at start-of-life - as Ecobalyse currently attempts to do. In the absence of a more robust lifespan measure, the necessary research must be undertaken to identify, measure and weight the factors proven to determine textile longevity.
Reference	https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/

Concern	Disadvantaging raw material sourcing countries through **EU-centric characterisation factors.**
Context	Impact categories such as climate change, land use, ecotoxicity, acidification and eutrophication are based on European-default characterisation factors. With the farming stage typically dominating the environmental impacts of natural fibre products, scoring must reflect the countries and regions where those impacts are experienced. Application of default EU characterisation factors to remote countries with vastly different climatic and environmental conditions to the EU often significantly over-estimates environmental impacts experienced in those countries.
A better way	Characterisation factors should be amended to ensure impacts are relevant to the countries and regions where the impacts occur.

Concern	Ecobalyse calculator's traceability index ignores raw material sources.
Context	Knowledge of country of raw material origin adds perceived value to products, eg Mongolian Cashmere, Egyptian cotton etc.
A better way	Include raw material provenance along with manufacturing information in the calculation of the traceability index.