

# EU PUBLIC CONSULTATION

## PEFCR APPAREL & FOOTWEAR

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### WHAT IS HAPPENING?

The European Commission is holding a public consultation on the Product Environmental Footprint Category Rules (PEFCR) for Apparel and Footwear.

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### WHAT ARE PEFCR?

The PEFCR for Apparel and Footwear are an environmental footprinting tool that will be used by brands to assess certain environmental impacts of textile products and substantiate environmental claims on products.

3

### WHAT IS THE ISSUE?

In its current version, PEFCR scores are expected to result in fossil fuel-based fibres (such as polyester) being the most sustainable, with natural fibres scoring the worst.

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### WHAT IS AT RISK?

If the PEFCR tool remains in its current form, brands and well-intended consumers may stop using natural fibres and switch to synthetic fibres. This will see increased microplastic pollution and plastic waste. It will also threaten the livelihoods of growers and herders around the world, along with natural fibre supply chains.

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### WHAT TO DO?

Widespread feedback to this public consultation by 28 April 2024 is vital to preventing adoption of this version of PEFCR and encouraging improvement. Please submit your feedback using the guidance in the Make The Label Count document, where useful.

## HIDDEN DATA, UNCERTAIN FUTURE

Public consultation on PEFCR is undermined by inaccessible studies and incomplete methodologies, which will result in ill-informed public feedback and severe impacts on natural fibre industries.

## THE BIAS AGAINST NATURAL FIBRES

PEFCR unfairly favour fossil fuel-based fibres by excluding the environmental costs of fossil fuel formation, skewing comparisons and disadvantaging natural fibre products in environmental footprint assessments.

## MICROPLASTIC GREENWASHING

The PEF method's failure to fully integrate microplastics as an environmental impact category, opting instead to report 'microfibres' as "additional information" in PEFCR, undermines consumer awareness and EU environmental policies.

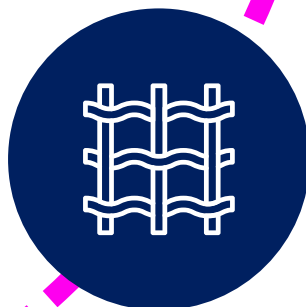
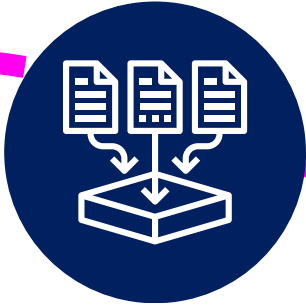
## FLAWED DURABILITY ASSUMPTION

PEFCR overemphasize physical durability in garment life estimation, ignoring consumer behavior. This favours synthetics, thus enabling fast fashion.

## BLIND SPOT ON PLASTIC WASTE

The PEF methodology's exclusion of solid waste as an impact category goes against the essential principles of the circular economy, overlooking the mountains of synthetic clothing in landfill and the biodegradability benefits of natural fibres in environmental footprinting.

# Key concerns with PEFCR for Apparel & Footwear



## 5 STEPS TO

# Submit your opinion to PEFCR Public Consultation

01

Review the Excel sheet provided by MTLC with a suggested response.

02

Adapt the Excel sheet with your own comments, name and organisation.

03

Create an ECAS account:  
<https://tinyurl.com/4z64hkd7>

04

Once you are logged in with your ECAS account submit the Excel sheet here:  
<https://tinyurl.com/5ctjwcj3>

05

Tell your network to complete the public consultation as well!