



## **COMMENTS AND PROPOSAL FROM THE BRANDS AND RETAILERS COMMITTEE**

(This document will be presented by the  
Chair- Nate Herman during the PSAC session  
at the ICAC Plenary meeting)

For PSAC's session at the ICAC Plenary Meeting, the following workflow was decided for the PSAC:

**All the Permanent Committees of the PSAC will discuss 'The Regulatory Policies by some Governments that Could Negatively Affect the Consumption of Natural Fibres', which is also supported by all the Permanent Committees as a topic for the PSAC session at the ICAC Plenary Meeting in November.**

Various Governments are contemplating policies that could impact the consumption of natural fibres. In particular, once the European Commission publishes the substantiating Green Claims Initiative, they are going to use the PEF method to establish how we proclaim something to be Green in the textile world going forward. It's difficult to turn back from these proposals once they have been adopted. Therefore, we need to make our voices heard now. What we are missing at this stage is a united voice from cotton's private sector stating concerns over the socio-economic repercussions if we are not provided a level playing field with manmade fibres.

The European Commission will have discussions on the Substantiating Green Claims Initiative at the end of November 2022, which will form a major part of the legislation going forward. This legislation will be presented in European parliament in 2024.

### **An Update:**

- The discussed IWTO document will be available next week, and we will notify you immediately.
- The Norwegian Consumer Authority has taken an action against an environmental label that the Sustainable Apparel Coalition was testing out to translate the Higg Index and MSI into a consumer friendly eco label. The Norwegian Consumer Authority claimed that the label was greenwashing because it undercounted the impact of petroleum-based fibres and there are still discussions going-on on this issue.



### **How can you help:**

- Please fill in your comments under each draft question below. These comments will be compiled to form a proposal from this committee and will be presented by the Chair to the ICAC Member governments' delegations.
- Arrange that your organisation joins 'Make the Label Count Campaign'. Please review the campaign and register directly with them, plus advise any comments or advice from the representative of your organisation.

### **1. How does cotton bring stability and resilience to world communities: -**

- Wherever cotton is grown it supports economy of that country by rising the income of farmers and downstream stakeholders. Cotton fibre is used since the time of recorded history and it has brought the prosperity to the communities involved in cultivation and process of cotton. M.K (Mahatma Gandhi) considered to be father of Indian nation realised the importance of cotton in creation of wealth in rural India. He made manual spinning of cotton as a national symbol of self- reliance.

### **2. Recommendations/Comments/Concerns from the Brands and Retailers Committee Members to the European Commission on the on-going debated legislations: -**

(As collected from the committee members)

The Subcommittee lauds the objectives and being at the forefront if seeking to implement the policies, however there are issues, including but not limited to:

- Microplastics and micro fabrics from the polyester can never decompose, and the Product Environmental Footprint (PEF) system is silent about microplastic pollution.
- Ensuring a level playing field for natural fibres in the environmental rating tools is crucial.
- Old Life Cycle Assessments (LCAs) should not be used to compare one fibre to another, which is also against International Organisation for Standardization (ISO) recommendations. ISO recommends that LCAs not be used for comparing fibres.
- Consumer impact should be taken into consideration. Studies show that 70% of a garment's impact can be reduced by how the consumer uses that garment.
- The use phase of a garment should be taken into consideration. We don't have to wash a natural fibre garment as frequently as manmade fibres.



- Existing certification systems do not match the work they undertake with parts considered 'irrelevant'.
- Cotton apparel offers reusability options. It can be shredded and converted into either fibre or in bulk. The life cycle of cotton fibre can be extended substantially. On the other hand manmade fibres do not offer recycling options.

**3. What are the anticipated socio-economic impacts and direct impacts on businesses of Brands and Retailers as a repercussion of these legislations: (how does it impact you?)**

- There are many brands and retailers that produce a big part of their product line-up using cotton. Not providing a level playing field for natural and manmade fibres impacts the brands' freedom of choice regarding which fibres they want to use in their production.
- A study conducted with brands and retailers in Germany showed that cotton accounted for more than 50% of the fibres used by the brands.
- Cotton plays a very important role for Brands and Retailers, and they have an interest in having a fair evaluation of fibres.
- Any restriction on natural fibres will have an effect both in volume and value of the Brands' and Retailers' businesses.
- Potential impact on consumer demand — consumers who still prefer to wear cotton.
- Risk of confusing consumers who have historically chosen cotton with sustainability in mind.
- From a consumer's perspective, the negative labelling of cotton textile products compared to man-made fibre products doesn't fit with the Single-Use-Plastic Directive of the EU, where the use of all sorts of one-way plastic products has been forbidden due to microplastic pollution.
- In negative labelling of cotton fibre will have a significant socio-economic impact since it will affect the preferred choice of consumers. Retailers will be impacted because negative labelling will create a bias in the mind of consumers. The ecological benefits of cotton fibres are well known.



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ADVISORY  
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4. Statements of support from the Brands and Retailers Committee organisations, including examples of “good and strong” data as support: