



POLICY
HUB

circularity for
apparel and footwear

Celebrating
5 Years
of Driving Circularity
Change in the Textile &
Footwear Industry

“Over the last five years, the Policy Hub has emerged as a recognised leading force, serving as the primary destination for discussions among textile industry stakeholders, and providing valuable educational resources for institutional decision-makers regarding the sector’s dynamics. We advocate for the adoption of sustainable regulations that will fundamentally transform how textiles are produced, consumed, and disposed of. Additionally, we assist stakeholders in understanding and preparing for these transformative changes”.

Antoine Demarche,
Director of Public Affairs,
Policy Hub

The Policy Hub was launched with a mission: uniting stakeholders across the textile and footwear value chain to speak in a shared voice with European decision-makers. Our goal? To advocate for an ambitious regulatory framework that prioritises environmental and social sustainability within the sector.

Our unique technical expertise stems from members of the founding organisations: **Cascale** (formerly Sustainable Apparel Coalition), **Global Fashion Agenda** (GFA), **Federation of the European Sporting Goods Industry** (FESI), along with contributions from our Advisory Group: **Textile Exchange**, **Fashion for Good** and the **Social & Labor Convergence Program** (SLCP).

Together, these organisations unite over 700 brands, retailers, manufacturers, service providers, representing more than 50% of the apparel and footwear value chain. But above all, they represent long-standing expertise across diverse facets of the textile industry, ranging from design and manufacturing, to supply chain management, certifications, and sustainable fashion.

Despite being one of the largest global economic sectors, the textile industry has historically lacked robust regulation in terms of sustainability. It is now at a pivotal moment in its sustainability journey, marked by the groundbreaking introduction of an unprecedented regulatory framework at the EU level. Since our creation, nearly 20 legislative proposals have been presented by the European Commission. These are set to drive fundamental changes in how sustainable and circular practices are integrated, developed, and scaled within the textile industry.

Voices of Our Partners



"Since its origins, Cascale has focused on systems change, working collaboratively with like-minded organisations such as GFA and FESI to provide an industry voice on the pressing policy mandate. Five years ago, we co-founded the Policy Hub to propose ambitious sustainability policies for the textiles industry, with a focus on Europe. Since its founding, Policy Hub has led collaborative policy development on a number of key areas ranging from Ecodesign and waste, to green claims, product labeling and more. Policy Hub supports and shares our influence in education, alignment, and advocacy. Our hope is for many more years of success!"

Andrew Martin,
Executive Vice-President,
Cascale



"2024 is a key moment in time when it comes to EU textiles related regulation – with over 16 legislative pieces already unveiled targeting our sector and an increasing number of organisations working on textiles-related policies. Educating, convening and aligning are at the forefront of GFA's public affairs priorities in order to bring the right level of information to both the industry and policymakers. One way we aim to achieve this is through active partnerships, with for example, the Policy Hub in which GFA plays a pivotal role as a Partner."

Federica Marchionni,
Chief Executive Officer,
Global Fashion Agenda



"Over the past five years, the apparel and clothing industry has undergone a remarkable transformation, evolving from an unregulated landscape to a well-regulated sector. Sporting goods companies, in their efforts to adapt to and enforce these changes, quickly recognized the necessity of forging strong alliances within the textiles ecosystem. It became clear that no single company, sector, or industry could achieve such a monumental shift towards traceability and transparency on their own. It feels like just yesterday when visionary organisations came together, united by a common purpose, to create the Policy Hub—a dynamic platform designed to facilitate alignment, foster peer learning, and champion the development of progressive policies."

Jérôme Pero,
General Secretary,
Federation of the European Sporting
Goods Industry



"Since its inception, the Policy Hub has served an important role in providing a consolidated industry voice to EU policymakers. Textile Exchange is pleased to be an Advisory Group member of the Policy Hub, and we look forward to continuing to feed into the relevant discussions to ensure that policies strike the right balance of aspirational and realistic for the industry."

Beth Jensen,
Senior Director,
Climate and Nature Impact,
Textile Exchange



"Establishing the Policy Hub five years ago was a visionary move in light of the rapidly evolving legislative landscape. SLCP is proud to have become a member in 2024, aligning with PH in our shared vision of multi-stakeholder collaboration and industry consensus. Together, we leverage SLCP's credible social and labor data to drive evidence-based policy-making and ensure regulatory compliance, while also paving the way for aligned public policy advocacy and research initiatives. A recent highlight includes our joint efforts with PH to shape the European Commission guidelines for the textile sector on the implementation of the CS3D. Looking ahead, we are eager to deepen our collaboration to advance sustainability and decent work across global apparel and footwear supply chains."

Janet Mensink,
Chief Executive Officer, Social &
Labor Convergence Program

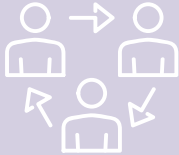


"Being part of Policy Hub has been instrumental as Fashion for Good navigates the upcoming EU legislation and its impact on our Innovators. It has also provided us with an opportunity to give our Innovators a voice in shaping future legislation, ensuring that innovation is not hindered but promoted."

Georgia Parker,
Innovation Director,
Fashion for Good

**Partner
Organisations**

6



**Stakeholders
Represented**

700+



**Ongoing Key
Legislative Files**

7



**Position Papers
shared with
EU Institutions**

14



**Five Years
in Numbers**

Published Reports

4



**Meetings with
EU Policy makers**

>185



**Contribution
to European Commission
Public Consultations
& Roadmaps**

18



**Opinion Pieces
& Blog Posts**

12



Policy Hub Events

7



EU Legislative Train

The textile sector is under growing legislative pressure, with Europe aiming to revolutionise the industry by 2030 through the EU Strategy for Sustainable and Circular Textiles. The objective? Transition to a circular economy by promoting goods that are sustainably made, longer-lasting and easier to repair and recycle.



Ecodesign Requirements



Textile products sold within the EU will need to comply with mandatory eco-design requirements related to durability, recyclability, reusability, energy and resource use, and carbon and environmental footprints based on a life cycle assessment.

Stepwise Approach

Start with realistic requirements that align with the industry's current capabilities and gradually raise standards over time with periodic reviews.

Design Focus

Design is central to making fashion more sustainable. New rules should emphasise the physical aspects of products, focusing on designing for their intended use.

Holistic Perspective

Consider the entire value chain, including the reverse value chain (i.e., returned products), and the various trade-offs of different materials and fibres. The approach should carefully balance product demands such as recycled content, durability, and recyclability to avoid negative trade-offs.

Encouraging Innovation

Set industry standards based on sustainable practices and foster stakeholder collaboration to adopt eco-friendly technologies.

Capacity Building

Provide training for all industry players on how to meet eco-design requirements.

Data Management

Ensure access to comprehensive data to set feasible eco-design rules.

PH RECOMMENDATIONS



Avoiding Misleading Green Claims



Legislative instruments enhancing transparency for consumers by prohibiting vague and misleading ecological claims on products (Empowering Consumers for the Green Transition Directive) and providing a legal framework for substantiating and verifying ecological claims on products (Green Claims Directive).

Harmonisation of definitions

to prevent greenwashing and ensure fairness and transparency when communicating with consumers. Legislative coherence between both Directives is fundamental for a smooth implementation.

Robust Background

The implementation of both instruments must be backed by scientific methods and data requirements to substantiate green claims.

Common Methodology Needed

Fundamental to use a mandatory common method for environmental claims to boost comparability and streamline the verification procedure.

Feasible Implementation Timeline:

We suggest the EU Commission provides support and feasible and realistic timeframes for implementation of new rules and phase-out of existing labels.

PH RECOMMENDATIONS



Social Sustainability



The Commission introduced a comprehensive set of measures to uphold human and environmental rights in the textile value chain. This includes due diligence for identifying and addressing adverse impacts, as well as obligations for remediation and communication under the Corporate Sustainability Due Diligence Directive. Furthermore, it proposed instruments to monitor and investigate products linked to forced labour (Forced Labour Regulation).

Clear and timely sector-specific guidelines

for the textile sector that are fit for purpose and effective in supporting meaningful implementation.

Harmonising and aligning with international standards,

notably when it comes to the transposition of the CS3D into national laws.

Ensuring alignment between CS3D guidelines and the Forced Labor Regulation,

as the two are closely linked.

Adopting a gender-responsive approach

to ensure a comprehensive and equitable human rights due diligence process.

Acknowledging the key role of traceability

and monitoring of supply chains.

Including climate change impacts

throughout the value chain, integrating risk reduction and mitigation efforts with climate adaptation measures.

Adopting a life-cycle and resource-efficiency approach

to identify and addressing serious risks across the value chain.

Maintaining industry certifications

supports environmentally responsible production and facilitates communication for sustainable choices.

PH RECOMMENDATIONS



Waste Management Legislation



Europe produces 12.6 million tons of textile waste each year, with clothing and footwear accounting for 5.2 million tons. To fight this, the EU has mandated a separate textile collection by 2025 and proposed holding producers responsible for the entire lifecycle of their products. Central to this initiative is introducing mandatory Extended Producer Responsibility (EPR) across Europe (revision of the Waste Framework Directive)

Strong need for creating efficiency and economy of scale

between waste management organisations.

Making the list of EPR schemes activities close-ended

and specifying “preparation for recycling”.

Clarifying where the EPR fees should be paid:

in the Member State where the waste is disposed of, rather than where the operator is based.

Circumscribing the ecomodulation criteria

exclusively to the parameters defined under the ESPR.

Including take-back schemes

into the scope but do not mandate waste permits to set such in-store collection points.

Do not mandate “sort for proximity”

as it will limit the feedstock availability per country and recycling type, impeding the scaling up of new recycling technologies.

Ensuring harmonisation of reporting requirements from companies to PROs.

PH RECOMMENDATIONS



Textile Labeling Regulation



In Q4 2024, the Commission will revise the textile labelling Regulation to introduce specifications for physical and digital labelling of textiles, including sustainability and circularity parameters based on requirements under the Regulation on eco-design for sustainable products.

Physical labels should be restricted to essential information:

all additional ones should be included in the digital label.

The digital label should also duplicate the essential information

to ensure compliance for e-retailers.

Avoiding duplication of information requirements

already introduced by other EU initiatives.

Aligning TLR with global standards

to ensure efficient international trade, facilitate market access and promote a level playing field for businesses operating at a global scale.

Enhancing tolerance levels for recycled fibres

to reflect the EU's goal of boosting the recycling of textiles.

Promoting collaboration between stakeholders

to improve the clarity and accessibility of sizing information, without imposing mandatory product sizing.

For more information on our work, follow us on LinkedIn and visit our website

Looking Forward

The next European Parliament will be elected in June 2024, shaping the formation of a new European Commission. Ursula von der Leyen's Green Deal, targeting climate-neutrality by 2050, has been challenged by COVID-19, geopolitical instabilities, and rising energy prices.

The anticipated top priority of the next Commission is to fight climate backlash while ensuring the resilience of the EU economy. This is likely to involve the adoption of a "European Industrial Deal" focusing on competitiveness and reducing bureaucracy over climate legislation.

Policy Hub's 5 Key Policy Recommendations for the New EU Mandate

Reaffirming Commitment to the EU Green Deal

and Europe's visionary approach to a more sustainable future.

Implementing the recently adopted Regulatory Framework

Reinforcing the implementation and enforcement of the EU Green Deal to ensure its success under the new mandate.

Enhancing Legislative Harmonisation across the EU and Ensuring an Equal Level Playing Field

Strengthening harmonisation of legislation across the EU and measures to secure fair competition within the industry.

Strengthening Global Collaboration

Encouraging meaningful dialogues with local authorities and suppliers, exploring capacity-building initiatives, providing financial support for manufacturers and raw material suppliers, and leveraging international standards whenever possible.

Addressing the Missing Links

Critical need for coherence between EU legislative proposals to ensure effective implementation by the industry.

[Read our full recommendations >](#)

FAQ

Why was the Policy Hub created?

In response to the proliferation of public affairs initiatives launched by sustainability organisations and industry players, each aiming to speak on behalf of the whole textile industry. This situation led to overlaps and inefficiencies, particularly for institutional decision-makers overwhelmed by opinions from numerous stakeholders. Additionally, many industrial organisations lacked the capacity to address the myriad of regulations emerging from the EU. Hence, we wanted to create one collaborative platform to provide concerted recommendations to the decision-makers, ensuring that the textile industry's voice is both clear and impactful.

How to become a member?

Membership is open to stakeholders within the apparel and footwear sector operating in the EU market, brands, manufacturers, retailers, service providers.

Eligible candidates must be members of one of the founding organisations (Cascade, GFA, FESI) or participating in the Advisory Group (Textile Exchange, FFG, SLCP), and have publicly committed to advancing circular practices and supporting others in this effort.

How are you funded?

The Policy Hub is financially supported by Cascade, annual fees paid by our Advisory Group and individual members, and additional in-kind contributions from the partner organisations.

How do you ensure a progressive voice in the industry?

Our vision and mission focus on promoting the adoption of an ambitious policy framework that accelerates sustainability and circularity.

This requires developing a progressive vision for the industry. By gathering stakeholders of all sizes, we stimulate debate and encourage the most hesitant actors to reconsider their positions. Additionally, our rigorous internal review mechanism ensures that each of our policy recommendations are representatives of the diverse perspectives of our members. This process also guarantees that the Policy Hub will not advocate for policies that could go against its mission.

Brands are at different stages of their circularity journey. How do you accommodate all of them?

We gather insights from industry leaders regarding best practices and disseminate this knowledge through our forum. At the same time, we engage with stakeholders in the early stages of their circularity journey to understand the difficulties they encounter. This dual approach empowers us to prepare well-informed policy recommendations that align with the aspirations of leading players, yet remain feasible for microenterprises, SMEs, and other brands at the beginning of their circularity efforts.

How do you contribute to the work of the EU institutions?

We provide institutional decision-makers with unique technical expertise throughout the legislative process. As a registered entity in the EU Transparency Register, the Policy Hub participates in all consultation processes initiated by the EU institutions regarding legislative proposals related to sustainable development in the textile and footwear sector. Therefore, we engage with the European Commission, the European Parliament, and Member States to provide them with data, recommendations and proposals for amendments.

How can I engage with the Policy Hub?



www.policyhub.org



[Linkedin page](#)



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