

# Textile Recycling Association

Sent on: Thursday, June 17, 2021 1:40:16 PM

To: misleadinggreenclaims@cma.gov.uk

Subject: Misleading Green Claims Consultation

Dear Sir/Madam

I am responding to your consultation document on misleading green claims on behalf of the Textile Recycling Association. Our trade association is the established UK trade association for the used clothing and textile collection, sorting and processing industry. Collectively our membership represents over 75% of the established professional trade in the UK.

The environmental and social impacts associated with the fashion and textile industry are becoming increasingly apparent. Some estimates suggest that the industry is responsible for around 10% of all global greenhouse gas emissions. Additionally it is massive consumer and polluter of scarce freshwater supplies. About 10,000 litres of water are required to produce just 1kg of cotton and it is thought that around 20% of all global freshwater pollution can be attributed to the textile production process (mainly during the dyeing and finishing process). There is apparently a saying in China which goes along the line of “you can tell the colour of this season’s fashion just by looking at the colour of the rivers. Additionally, it is thought that clothing is the biggest source of micro-plastics and the potentially even more damaging “natural” micro-fibres in the oceans. Garments made from natural fibres such as cotton shed more and therefore in order to reduce this problem, finishes are applied to try and make the garments last longer. But still more natural fibres escape into the waterways and because of the finishes used they stick around for many years. Additionally these finishes can contain toxins and mutagens (hence they are a problem).

This just gives a brief idea of some of the really big environmental issues associated with the fashion industry. Very often one might find that in attempting to address one environmental aspect of the clothing supply chain, there could be a bigger environmental impact caused elsewhere. For example somebody who might have read about micro-plastics in the ocean, may decide not to buy any polyester clothing and decide to switch to cotton clothing. Yet the over-irrigation of cotton plantations around the Aral Sea in central Asia has led to one of the biggest environmental

disasters in the world (which many still do not know about). At the beginning of the 20<sup>th</sup> Century the Aral Sea was the 4<sup>th</sup> largest inland body of water in the world. In the 1960s the Soviet Union started rapidly expanding cotton production in the region and diverted water from the river that supplies the sea. As a result of this the sea has now all but disappeared. It is now just 10% of its original size and where there once an inland sea there is now just dessert.

Therefore making claims about the environmental credentials of a garment or textile product is very tricky.

A few weeks ago you could hardly switch on a commercial TV channel without seeing this advert from Levi.

<https://www.youtube.com/watch?v=M7ZBIcUz-IE>

As I probably pay more attention to the advert than most, I have picked up that the advert is actually telling us to buy less clothing, keep it for longer, buy better etc, which is all very laudable.

However, to the less attentive, they may take home the message that Levi is an ethical and environmentally friendly brand and that their products are better for the environment, yet in this advert they do not actually explain what Levi are doing to address their environmental impacts or why their products are better for the environment than other apparel companies.

Because of the known environmental impacts of the apparel industry and the fact that the UK Government, EU, UN and national Governments have identified textiles as an urgent priority to address, more apparel companies are suddenly clamouring to be seen to be green and more green claims about clothing and textile products will be made for decades to come.

### **3.6 – Case Study – The Netherlands – The Authority for Consumer and Markets (ACM).**

Whilst we do not have a silver bullet answer that will help you to address all these issues, we wanted to make sure that you are aware of what the Authority of Consumer and Markets (ACM) is doing in the Netherlands to try and tackle the issue of greenwashing in the apparel sector (as well as the energy and dairy sectors).

As a rule of thumb the ACM require that sustainability claims should be honest and:

- Make clear what sustainability benefit the product offers
- Substantiate sustainability claims with facts, and keep them up-to-date

- Ensure comparisons with other products, services, or companies must be fair
- Be honest and specific about the company's efforts with regard to sustainability
- Make sure that visual claims and labels are useful to consumers, not confusing

To me it is not clear whether the Levi advert that has just gone out in the UK, would meet the requirements of the ACM.

You can find out what the ACM are doing at <https://www.acm.nl/en/publications/acm-launches-investigations-misleading-sustainability-claims-three-sectors>

You can also find the letter that the ACM has sent out to apparel businesses operating in the Netherlands at <https://www.acm.nl/en/publications/letters-companies-energy-clothing-and-dairy-sectors-about-sustainability-claims>

I hope that you find this useful and if you would require any clarification about the points raised, please do not hesitate to contact me.

Thank you.

Kindest regards

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