Feedback to the Ecobalyse regulation consultation

19th December 2024

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Developing a system to assess and compare the environmental impact of textiles against each other should be based on knowledge and not guesswork. We see that Ecobalyse is based on some guesswork that is more probable than what PEFCR is based on, but both systems rest on some fundamental errors and lack of knowledge.

If fast fashion and perhaps even more importantly ultrafast fashion, which is the fastest growing, are to be reduced and preferably discontinued, then we need:

1. an operational definition of the terms fast fashion and ultrafast fashion
2. proposals for regulation that directly affect such business models.

The positive thing about Ecobalyse is that marketing is included (e.g., the length of time the product is on the market). We consider this a good guess of what probably has an impact on the Duration of Service, and could be included in a definition of fast fashion and ultrafast fashion. To investigate whether this is the case, simpler methods are needed to look at the connection between elements of marketing and product design on the one hand, and how long and how much the products are actually used. In other words: measure the effect on the use. How long something is used (DoS) is the single element that gives the greatest payoff when environmental impact is calculated for products, where many products are never used and other things are used over 1,000 times. To be able to measure such effects more effectively, clothing must be clearly dated, so that textile waste can be used as a source of DoS estimation. This is urgent.

That more durable clothes contribute to their being used more and longer, is a theory. A lot of things speak against this theory, such as the fact that more and more clothes are thrown away long before they are worn out and that 2/3 go out of use for reasons other than wear and tear. Stronger clothing will also have negative effects for the user (more plastic, thicker, heavier). Many light, thin and flimsy clothes, such as e.g. a silk blouse, is typically worn for a long time and a lot. If durability is to be used as an indication of DoS, this should apply to the types of clothing where it will have a positive effect (e.g. stockings) and it must be done with fibre-specific levels for strength testing. The fact that there are many blends can easily be solved with a simple formula where the various levels are added to the mix.

Ecobalyse is based on LCAs and does not take into account that it is in no way suitable for such a comparison.

- The lack of functional unit as we wear clothes for many different reasons.

- The lack of taking into account the health consequences of synthetic materials breaking down over time, but not being biodegradable, resulting in microplastics and plastic fragmentation in landfills and in third-world countries.

- Global average data for impact in value chains where it is important to know where and how something is produced, as this will vary widely.

- Avoid using indicators that are ambiguous. An example of this is land use. This indicator has a major impact on the calculation and contributes to favouring synthetic fibres. For animal fibres, it also contributes to favouring poor animal husbandry and poor utilization of rangeland resources. This is important in the Alps, the Pyrenees and in Norway. Instead of rewarding good utilisation of non-cultivable land and extensive pastures, the use of large areas of land is considered negative, while small unhealthy enclosures are considered positive. In addition, several parameters such as eutrophication, acidification, toxicity, etc. will be positively affected by the fact that grazing takes place over large areas and not small ones. For organic cotton, the lower yield is affected in the same way by using land use as a negative indicator.