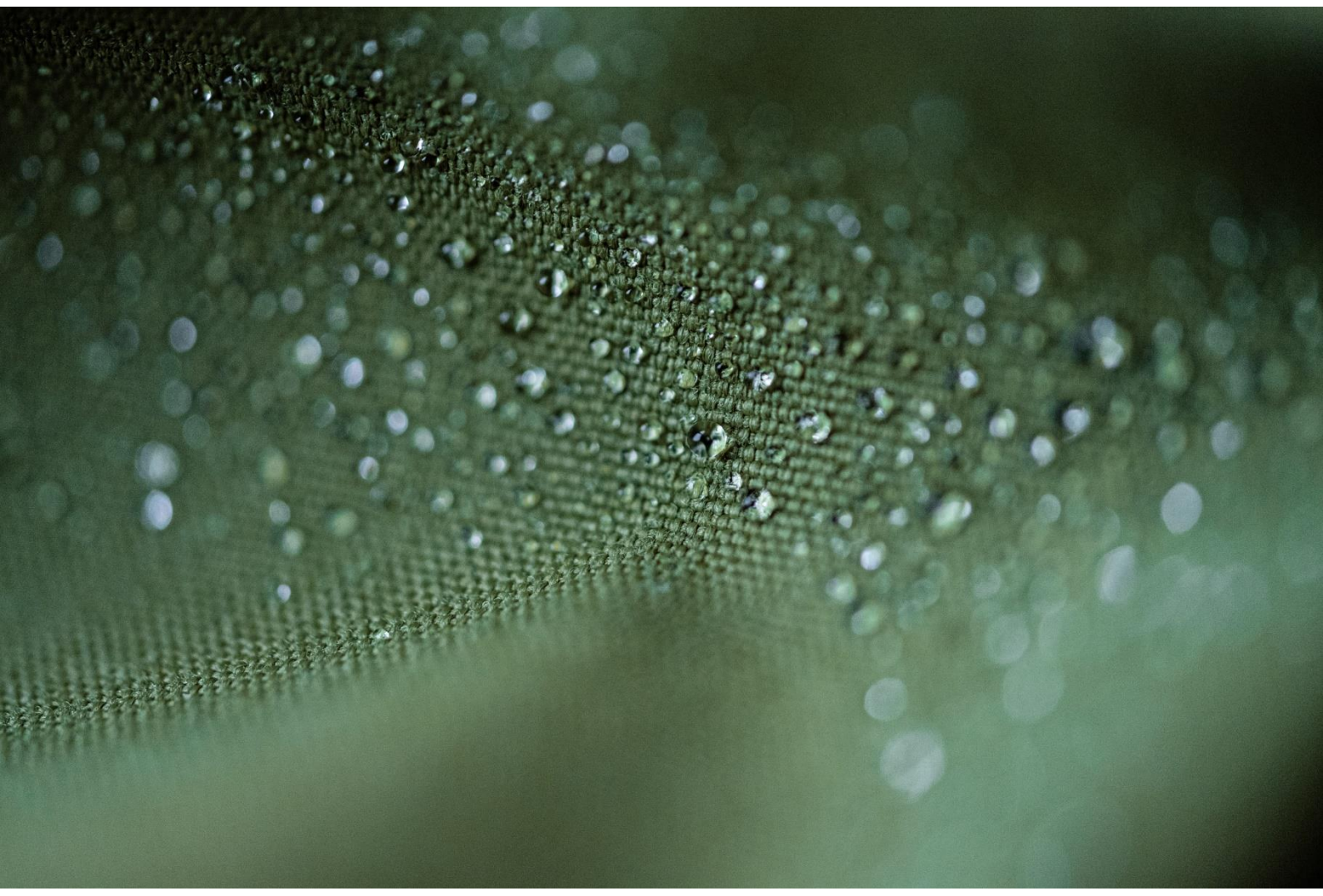


Sympatex® comments on the EU Commission's proposal for Ecodesign for Sustainable Products Regulation

Sympatex welcomes the opportunity to provide feedback to the EU Commission's proposal for Ecodesign for Sustainable Products Regulation.

Sympatex fully supports EU policy to regulate that design for circularity becomes the norm for new products in order to ensure that waste is avoided at the end of life and material resources are used in the most economic way. This is not only a moral imperative for future generations, but it will create a level playing field for manufacturers placing products on the EU market and at the same time will boost a resource limited economy.



Sympatex main comments on the ESPR proposal are the following:

- Sympatex truly welcomes the ESPR and welcomes the future adoption of ecodesign criteria for textile products. As an industry, we should press the accelerator as much as possible now that a direction is set. Ecodesign will make the industry more sustainable, will ensure a level playing field and boost innovation through channeling creativity.
- Minimum design requirements for textile shall include: oClear rules specifying requirements for design for economic efficient recyclability and rewarding recyclability analogously to durability. This should include restricting materials where no economic recycling solutions are available on the market as well as substances that hinder recycling; the most sustainable garment is a garment, which has a long lifetime, high quality and can be recycled to a new product to truly close the loop. ohigh minimum requirements for recycled content for materials where recycling technology is readily available today e.g. polyester-based textiles. We call on the EU to legislate a 50% recycled content target in all textiles by 2025 and 95% by 2030.
- The Product Environmental Footprint methodology should serve as a basis for product requirements for apparel and textiles. Nevertheless, the PEF as it stands today needs to better integrate circularity and end-of-life to serve both purposes.
- The Digital Product Passport shall prioritises the disclosure of data required to accelerate the circular economy i.e. information on a need-to-know basis to allow for better recycling at end-of-life. For the supply chain, transparency should be favoured against traceability as it is the most economic means for transformation. SME's should also be given additional support to effectively implement the DPP. Data carriers attached to the products shall not hamper the recyclability of the products.
- Involve the appropriate set of stakeholders when product requirements are developed. As eco-design will move to become more focused on circular design, it is key to ensure that the whole value chain relevant for circular design is duly represented. Brands and manufacturers should be directly represented as well as the expertise and input from end-of-life managers like recyclers.
- Develop markets for uptake for recycled materials through mandatory green public procurement standards rewarding recycled content and design for recyclability. GPP should become the leading role model and set the standards.
- Ensure strict compliance with and strong market surveillance of ecodesign requirements as this is essential to create the level playing field.
- Sympatex fully supports the planned ban on destruction of unsold goods - and to implement it immediately. In cases where unsold stock is available, it should be offered to circular business startups in order to support their first steps in going to the market. This would create a clear incentive to limit production to the actual demand as well as incentivising new circular business models.

About Sympatex®

Sympatex® is a EU-based manufacturer of high-tech functional materials used in apparel, footwear, contract & work wear and technical applications, such as water resistant outdoor garments. Sympatex produces a significant share in European countries, but also in Asia. Its markets are the EU, Japan, Korea, US and Canada.

Sympatex' core product is a polyester-based membrane (with by now >25% bio-based content and an increasing recycling share). On this basis it develops, produces and markets laminates for functional textiles and finished products for a range of brands around the world.

Since its foundation more than 30 years ago, Sympatex is working intensively on the topics of recycling and resource efficiency and offers recycling solutions on all three levels, i.e. membrane, laminate and garment with the explicit goal to accelerate the process of "Closing-the-Loop" in the apparel and shoe industry.

As products made from unmixed materials are much easier to recycle than those made from textile blends, for all its laminates, the clear focus is to convert to polyester-based mono-material solutions that by now represent over 85% of the Sympatex portfolio. In combination with an increasing share of recycled material, it aims by the latest in 2030 to have its entire portfolio based on circular material – and perfectly tailored for recycling.

Today, our pioneer product is made of 30% recycled polyester from old textiles and 70% recycled material from PET bottles. PET-recycling however, is not sustainable in the long-run and will likely not remain an available resource in the future. This is also not in line with our vision: our vision is to fully rely on input from recycling old polyester textiles.

Our goal is to become zero waste, from raw material to finished product, by 2030. The company's goal is to achieve a reduction in resources and waste through textile recycling management while maintaining the same level of recyclable materials.

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