

24 September, 2021

Via email: [EF\\_Helpdesk@sphera.com](mailto:EF_Helpdesk@sphera.com)

**RE: European Union's consultation on the Apparel and Footwear Product Environmental Footprint Category Rules (PEFCR)**

WoolProducers Australia welcomes the opportunity to a submission into the European Union's consultation on the Apparel and Footwear Product Environmental Footprint Category Rules (PEFCR)

WoolProducers Australia is the peak industry body representing Australia's approximately 60,000 wool growers. Our membership is comprised of the industry's commercial, superfine, broad wool and stud breeding sectors.

WoolProducers is nationally representative through our State Farming Organisation members and three democratically elected Independent Directors. Our policy areas include animal health and welfare, biosecurity, sustainability, pest management control, natural resource management, drought policy, emergency animal disease outbreak preparedness, trade and market access, and industry development including research, development, and extension.

As the representative body of Australian woolgrowers, who pride themselves on the sustainable manner that they produce our fibre, we hold grave concerns over the proposed PEFCR as presented in this consultation, as they fail to account for significant factors that demonstrate the sustainable attributes of wool.

The attached table details our concerns and proposed changes to the PEFCR, that in our opinion would more accurately reflect and account for wool's eco-credentials in an evidence based manner.

Please do not hesitate to contact me to discuss our submission further.

Kind regards



**Jo Hall**  
**Chief Executive Officer**  
**WoolProducers Australia**

*Table 1: European Union’s consultation on the Apparel and Footwear Product Environmental Footprint Category Rules (PEFCR)*

Subject	Page	Line #	Section	Figure/ Table/ Note	Type of comment (G,T,E)	Comment (justification for change)	Proposed Change
Default product Duration of Service of clothing (DoS)	32	421	3.3.2.2	Table 6	T	<p>The most sensitive factor influencing the environmental impact of a garment is how long it’s worn. It’s critical that the default values in Table 6 reflect the real lifetimes of garments to the degree possible. However, the use of the same default lifetime for all products in a subcategory prevents this.</p> <p>Peer-reviewed evidence demonstrate that animal fibre-based clothes are some of the oldest in the wardrobe.</p> <p>Donation rates to charity are also heavily influenced by the fibre composition of the garment<sup>1,2,3</sup>, making fibre type an important factor influencing the level of reuse.</p>	<p>The requirement to use the default Duration of Service should be removed, and users of the method should be given the opportunity to use supply chain specific values, <u>provided evidence of a different duration of service can be provided</u>. Such as peer-reviewed consumer surveys and surveys of rates of donation to charity.</p>

Intrinsic quality multipliers	34	460	3.3.3.1	Table 7	T	<p>It's logical that garments need to be sufficiently tough to provide a long lifetime. However, the proposed 'intrinsic quality multiplier system' assumes super tough garments will have a super long lifetime and evidence for this is lacking.</p> <p>Other factors such as adjustable garment size (i.e. adjustable waistline and the garment's ability to stretch) are known to significantly affect the duration of service of clothing and should be accounted for.</p>	<p>To achieve a credible and balanced PEF rating, the method must include non-physical attributes known to influence product lifetime.</p> <p>Design for adjustable fit factors should be included such as:</p> <ul style="list-style-type: none"> <li>• Adjustable or flexible waist</li> <li>• Loose shapes including pleats, draping and flares</li> <li>• Fabric stretches &gt; 15%</li> </ul>
-Assessing intrinsic quality	127-176	2107-2184	Annex V	Tables 42 - 60	T	<p>The test protocols selected for intrinsic quality are dominated by strength tests including tensile strength, tear strength, burst strength and abrasion resistance. As such they will advantage clothing made from stronger fiber types. All animal fibre-based products will be disadvantaged because of their relatively low tensile strength. Animal fibre garments are durable and long-lived because of their elasticity not their strength.</p> <p>The contribution of elasticity to the duration of service is not proposed for assessment. This disadvantages inherently elastic fibres, such as those made from animal fibres.</p> <p>Under this system animal fibre-based products cannot achieve 'aspirational' performance, while many synthetic fibre-based products would be expected to do so.</p>	<p>The multiplier system is not fit for purpose and should be dropped.</p> <p>A single set of tests and thresholds which only the highest tensile strength fibre types can aspire to meet, ignores the reality of the actual duration of service provided by products made from different fibre types, and will bias PEF scoring.</p> <p>This limitation could be addressed by including lower strength thresholds animal garments to reflect their lower tensile levels.</p> <p>Alternatively, elasticity tests could be included to allow consideration of the positive impact of this attribute on garment lifetime.</p>
Assessing intrinsic quality	127-176	2107-2184	Annex V	Tables 42 - 60	T	<p>Ignoring the reality of less frequent cleaning of animal fibre-based products and imposing unfeasibly tight tolerances for dimensional</p>	<p>The multiplier system is not fit for purpose and should be dropped.</p> <p>To address this limitation, include</p>

					<p>stability for animal fibre-based products precludes this class of fibres from achieving high levels of intrinsic quality.</p> <p>The inherent odour resistant properties of animal fibre-based clothing result in them being cleaned less often during their lifetime<sup>17,18</sup>, reducing their footprint.</p> <p>The inherent elasticity of animal fibre-based products<sup>22,23</sup> enables greater tolerances in dimensional change of knitwear.</p>	<p>fibre specific thresholds for dimensional stability and cleaning frequency to reflect the actual use in real life.</p>
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