



CEC Reaction to EP Plenary Vote on the Ecodesign Regulation

The European Footwear Confederation (CEC) is the voice of an industry willing to further contribute to the green transition in the EU and worldwide. In this regard, together with our members and stakeholders' network, we welcome any EU legislative initiative – including the proposal for the Ecodesign for Sustainable Products Regulation (ESPR) – supporting companies toward the circularity of the footwear industry, and our commitment does not diminish despite these difficult times. We therefore support research and investments on ecodesign approaches with the opportunities offered by the latest technologies. However, we consider that the ESPR should consider the specificities of each product, as well as the readiness of the related industry. We are thus concerned on the outcome of the European Parliament's Plenary Vote this week that includes the footwear industry as a priority for ecodesign, and reiterate our call for an enforceable Regulation.

The European Parliament voted on the Plenary sitting of 12th July a more restrictive Report on the proposal for the ESPR, in line with the EP resolution on the EU Strategy for Sustainable and Circular Textiles earlier last month. Among the provisions negotiated since the adoption of the ESPR proposal by the European Commission in March 2022, the legislators are considering a ban on destruction of unsold goods, where recycling is intended as a form of destruction. Moreover, the EP Report sets an ambitious timeline to define ecodesign requirements for a selection of products considered at high environmental impact; among the list, footwear is included in combination with garments.

In light of the legislative trends addressed to the textiles ecosystem (textiles, clothing, leather and footwear) also beyond the Ecodesign file and the EU Textiles Strategy, the CEC and its members reiterate the need for a feasible and enforceable legislation, able to boost the state of play of the footwear sector in a realistic way, and aligned to the characteristic of the product and its value chain.

In view of the upcoming interinstitutional negotiations, the co-legislators should consider that:

- Footwear is a complex product composed by a multitude of materials and components, assembled with different techniques, subject to specific health and safety standards and requiring specific recycling and circularity models;
- The technological development of the footwear industry cannot be compared with other more advanced sectors within the textiles ecosystem. Because of the complexity mentioned above, more research is necessary to overcome the gap, and adequate funding needs to be allocated;
- Assimilating recycling to destruction is in contradiction with other pieces of legislation, starting with Waste Framework Directive, as well as against the spirit of the ESPR proposal.

The CEC remains available to cooperate with the co-legislators towards an enforceable ESPR for the footwear industry. Thus, we will continue the constructive dialogue ongoing with the EC for the definition of the future ecodesign requirements specific for footwear products, allowing to reduce the product environmental footprint without shrinking the EU footwear manufacturing tradition and the creativity of its interpreters, and considering the limitations for more than 95% of our industry.