

The Better Cotton Initiative's Position on the EU Circular Economy Act

The Better Cotton Initiative (BCI) welcomes the European Commission's ambition to make the Circular Economy Act (CEA) a cornerstone for accelerating the EU's transition to a truly circular economy. By strengthening the Single Market for secondary raw materials, boosting supply and demand for high-quality recycled inputs, and remove regulatory barriers, of the Act aims to double the EU circularity rate from 11.8% to 24% by 2030. These objectives are critical, achieving genuine circularity requires going beyond recycling. It must integrate **Sustainably Sourced Renewable Materials (SSRM)** alongside recycled materials, ensuring a fair and inclusive transition for primary producers and rural communities.

Cotton: the second most sourced textile fibre

Cotton remains the second most widely produced fibre after polyester. While conventional cultivation often relies on hazardous pesticides with serious social and environmental costs, sustainable practices can turn cotton into a driver of climate resilience, soil health, and rural prosperity. BCI promotes a continuous improvement approach that tackles environmental, social, and economic challenges – reducing pesticide use, protecting water and soil, conserving natural habitats and ensuring safe and fair working conditions for workers and farmers. Representing 23% of global cotton production, BCI's farm-level standard demonstrates how natural fibres can be part of the solution when backed by robust sustainability frameworks.

Beyond recycling: circularity needs SSRM

Circularity is not only about keeping materials in use; it is about designing systems that allow natural resources to be renewed. Recycling alone cannot meet industry demand for secondary raw materials due to structural and economic constraints.

The CEA must explicitly recognize that sustainably sourced renewable materials are indispensable for reducing dependence on fossil-based inputs and preventing environmental impacts such as microplastic pollution from synthetic fibres. SSRM – including fibres such as sustainably grown cotton offer a pathway to resource efficiency, climate resilience biodiversity protection and rural livelihoods support.

SSRM should be understood as materials that consistently deliver lower environmental impacts and greater benefits for climate, nature, and people compared to conventional equivalents. This means reducing greenhouse gas emissions, water use, and chemical inputs, improving biodiversity and soil health, and guaranteeing ethical labour practices. Certification through credible schemes provides assurance that these criteria are met. Embedding these principles into the CEA will harmonise definitions and prevent bias toward fossil-dependent recycled synthetics.

True circularity goes beyond physical durability

True circularity begins with keeping garments in use for as long as possible. It must also encompass the functional, sensory and emotional qualities that influence how long consumers value and retain textile products. Research on emotionally durable fashion shows that garments fostering attachment, care and a sense of belonging have longer lifespans, counteracting the logic of planned obsolescence in mainstream fashion.

Emerging policy tools, such as France's Textile Eco-Score, incorporate a *durability coefficient* into Life Cycle Assessment, adjusting environmental impact based on expected garment lifespan and incentives for repair.

The CEA should prioritise strategies that enhance product value – encouraging consumers to keep, care for and reuse garments across multiple life cycles – while ensuring that recycled content targets do not compromise functionality, comfort, and emotional value.

Aligning policies for a coherent circular framework

The CEA can enable greater harmonisation and legislative coherence, creating a robust framework to boost circularity. Regulation is a crucial lever: it drives supply through the Waste Framework Directive (WFD) and demand through the Ecodesign for Sustainable Products Regulation (ESPR). However, the lack of alignment between these instruments creates regulatory obstacles and risks disadvantaging natural fibres compared to synthetics, particularly under durability-focused criteria in ESPR.

By aligning with the EU Bioeconomy Strategy and the forthcoming Biotech Act, the CEA can create synergies that make circular materials – both recycled and renewable – the norm rather than the exception.

Circularity must ensure a Just Transition

Finally, circularity must also be regenerative and equitable. The CEA should reinforce the role of primary producers, particularly smallholder farmers, ensuring that rural communities are not excluded from the benefits of the circular economy. Embedding just transition principles will protect rural livelihoods and promote global inclusivity, aligning environmental goals with social responsibility.

The global textile industry employs approximately 140 million people, with 61.5 million working in the informal economy – underscoring the need for policies that safeguard social wellbeing alongside environmental objectives.

BCI urges the European Commission to deliver a Circular Economy Act that champions resource efficiency, inclusivity, and regeneration – with renewable materials and the work of primary producers of natural fibres at its core.

Sources

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