

Minutes on the exchange with the Confederation of the German Textile and Fashion Industry

22 March 2023

Participants: [REDACTED] Brussels Office of the Confederation of the German Textile and Fashion Industry), 20 managers of member associations, Kristin Schreiber (Director DG GROW, Unit GROW.F), [REDACTED] DG GROW F.1)

In her introductory words, Ms. Schreiber expressed understanding for the concerns of the textile and fashion industry and especially SMEs in this sector.

Industry representatives highlighted the potentially very high impacts of the wide restriction of **PFAS**. The participants underlined the necessity of **differentiating between different uses**. They consider the use of PFAS essential for technical textiles such as protective vests. Moreover, industry should be better supported in the **research and development of substitutes**, *inter alia* by legally providing for the possibility of testing potential substitutes. Support, in particular for SMEs, would also be necessary to ensure their **competitiveness** and strengthen **Europe as an industry location**. They were concerned about **the incoherence of different regulatory instruments and conflicting sustainability goals**, e.g. the interplay between the Ecodesign Directive and REACH. They fear that shifting the burden of proof for derogations to industry in the REACH revision will **not** make processes **less burdensome for industry**. They prefer semi-dynamic links to dynamic links, as they are more enforceable and provide better planning security.

Ms. Schreiber explained that the **consideration of socio-economic aspects** (under the current REACH) and the **essential use concept** (under the revised REACH) will ensure that critical uses will still be possible or only be restricted with long transition periods where no alternatives are available. She also agreed that **research on substitution** should be promoted and supported, without, however, provoking competition issues. As to the planned changes under the REACH revision, she underscored that, if conceived in a reasonable manner, they will effectively **reduce the burden for industry**. In general, Ms. Schreiber encouraged industry to **provide the Commission and ECHA with detailed information** on PFAS, skin sensitisers, essential uses, etc. and to come up **with constructive solution proposals**.