



**Committee for  
International  
Co-operation between  
Cotton Associations**

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**Cotton Associations represented:**

- African Cotton Association
- Alexandria Cotton Exporters' Association
- American Cotton Shippers Association
- Asociación para la promoción de la Producción Algodonera
- Association Française Cotonnière
- Australian Cotton Shippers Association
- Bangladesh Cotton Association
- Bolsa Brasileira de Mercadorias
- Bremer Baumwollbörse
- Centro Algodonero Nacional
- China Cotton Association
- Cotton Association of India
- Gdynia Cotton Association
- International Cotton Association Ltd
- Izmir Commodity Exchange
- Japan Cotton Traders' Association
- Karachi Cotton Association

13 June 2024

Dear Council of the European Union,

We are writing to you on behalf of the global cotton supply chain. The Committee for International Collaboration between Cotton Associations (CICCA) comprises 17 national and multinational associations who are committed to the sustainability of the cotton value chain. CICCA associations represent all cotton sectors, from farmers and producers to spinning mills and textile manufacturers. They include cotton organisations in Spain, Germany and Poland. Our member organisations span six continents, including all cotton producing and consuming regions of the world.

CICCA member organisations unreservedly support the Council's over-arching objective – to end fast-fashion and to promote a sustainable textile value chain. However, it seems inevitable that, as it is currently defined, the EU Green Claims directive will not have the effect you seek. We are writing to you on behalf of all our members to express our concerns about the European Council's current position on the Green Claims Directive regarding references of the Product Environmental Footprint (PEF) - the methodology to substantiate claims.

Recent communications suggest that the European Council is endorsing PEF or PEFCR, to underpin the Green Claims Directive, which will be voted upon on 17 June 2024. The PEF methodology unfairly favours synthetic, fossil fuel-derived materials over natural

fibres, misrepresenting natural fibres as harmful to the environment. The methodology has the unintended effect of promoting products derived from fossil fuels over natural products, and promoting non-biodegradable material over natural, biodegradable fibres. Not only does this give almost no recognition of this important sustainability criteria, it also poses a significant risk of injustice to farmers whose lives depend on the production of these natural fibres.

Our members who farm cotton are custodians of the land. They each recognise that this comes with enormous responsibility. In many regions, farms are often small, family-based, multi-generational operations, and we are yet to meet a farmer who doesn't want to hand their farm on in a better state than they found it; this is our definition of sustainability, our legacy, our heritage. If the EU introduces policy that favours cheap, synthetic fibres used by the fast fashion industry, the struggle for all those involved in the cotton supply chain, including farmers, will become even more severe and they may have no option but to give up on farming practices and providing food and fibre to humanity.

CICCA member farming practices involve supporting landscapes and communities, contributing to soil health and protecting biodiversity. These proven positive effects that result from responsible farming practices are all overlooked by the current PEF methodology. While we fully support meaningful sustainability labelling of clothing products based on accurate and complete methodologies, it is clear that the PEF methodology is not adequate to assess the environmental performance of agricultural products and will therefore enable greenwashing by fast fashion brands.

It is also important to highlight that the Technical Secretariat for the PEFCR for Apparel and Footwear has set a prohibitively high cost to participate in the voting process, meaning that only large brands with ample funding can afford to be a voting member. None of the 26 members are farmers. In fact, decisions are voted on and agreed by a two-thirds majority - there are 14 total voting members, 8 of which have a synthetic business model to protect. This highlights the extreme disadvantage for those of us in the wider community of natural fibres, up against the well-funded and powerful fast fashion industry.

If the European Council votes to include the PEF methodology on 17 June 2024, the Green Claims Directive will accelerate the growth of fast fashion and put farmers' livelihoods at risk. This directly contradicts the EU's promise to make "fast fashion out of fashion" and "support our farmers in a time when they are dealing with numerous challenges and concerns."

We therefore urge you to reconsider the use of the current PEF and PEFCR methodology and ensure that this policy truly reflects the realities of natural fibre production and does not risk damaging the livelihoods of all those who grow and employ cotton.

Sincerely,

Atif Dada (Pakistan – Chair)  
Josep Artigas (Spain – Vice-Chair)  
Bill Kingdon (UK and ICA – Secretary)