

E.XTENDED **P.**RODUCER **R.**ESPONSIBILITY

CARPETS
AND
TEXTILE FLOOR COVERINGS
POSITION PAPER



The European Carpet Market

Globally, Europe is the second largest carpet market. Whereas rugs and runners are mainly imported, typical wall to wall floorcoverings are mainly produced inside the EU.

Including textile floor coverings, synthetic turf, automotive carpets and other technical applications, the value of the EU production in 2022 was 3,89 billion € (including an exported value to RoW countries of 1,76 billion €, source Eurostat/ECRA).

Roughly 78 % of the EU-production remain in the common market. This places the European carpet industry and its supply chain as one of the remaining, essentially European.

THE CARPET INDUSTRY HAS A EUROPEAN SUPPLY CHAIN BY EXCELLENCE AND BELONGS TO A SMALL REMAINING SELECTED CLUB OF PREDOMINANT EUROPEAN NODES IN CONTRAST TO THE REST OF THE TEXTILE SUPPLY CHAIN

This important asset needs to be kept in mind and preserved while EU policies are being developed and implemented.

At the same time, carpets create significant waste streams by volume essentially being used e.g. as solid recovery fuels for cement kilns allowing to reuse the incorporated chalk, or still disposed of as landfill.

Although these bulky waste streams are often considered to be textile waste, they have their own challenges linked with collection and sorting infrastructure. Even those volumes already being recycled do not contribute yet to a consequent increase of the circular economy potential, as they remain isolated solutions.

Considering the current long lifespan of carpet products and the large volumes currently on the market, the industry would request a reasonable transition time for achieving full circularity goals. This includes accepting “Waste to Energy” (W2E) and ‘Waste to Landfill’ (W2L) as transition solutions.

CARPET WASTE IS A BULKY WASTE STREAM WITH OWN CHALLENGES TO THE COLLECTION AND SORTING INFRASTRUCTURE WITH WASTE 2 ENERGY AS NECESSARY TRANSITION SOLUTION FOR THE COMING YEARS

In the [industry strategy](#) “Leading the carpet industry towards circular economy - a 2030 strategic approach” published January 2021, the carpet sector acknowledges the need to accelerate the move to a circular approach including a better end of life management of waste. The sector’s

2030 vision is that all carpets placed on the EU market can be separately collected, reused, or fully recycled. In its strategy, the industry supports an EU wide

harmonised scheme for all flooring types and flooring materials in which the producer's responsibility is extended to the post- consumer stage of the life cycle.

The industry would support a tailor-made EPR scheme, and an incentive-based approach rather than a volume or mass based one. This EPR scheme needs to be set up at European level based upon the need to ensure a level playing field. Extended Product Responsibility is the important key to initiate a change in the value chain and trigger the shift from a linear to a circular economy. But if not integrated in wider strategy its final impact will be limited.

The European Circular Economy Action Plan and within it the extension of the scope of the Eco-Design Directive to other product categories, the textile strategy, and the sustainable product initiative are necessary supporting instruments to achieve a sustainable shift to circular economy and low carbon footprint products.

*WE SUPPORT A ROBUST,
EU-WIDE HARMONIZED,
CIRCULAR ECONOMY
FOCUSSED EPR-SCHEME*

A future EPR scheme cannot be developed isolated from what would be considered under other strategies for coherence, complementarity, and safeguard of the internal flooring market.

*WE BELIEVE THE CURRENT PEF
AND EPD STANDARDS VALID
BUT TOO COMPLICATED TO BE
USED WITHIN MODULATED EPR-
SYSTEMS*

The Extended Producer Responsibility is a tool to account for all environmental costs of the product through its life cycle including the waste stage. But to fulfill circularity, other types of incentives are necessary to encourage producers and the supply chain to design for recycling.

To this end, EPR needs to be a way for stimulating innovation and better product design, create secure revenue streams for collection and recycling infrastructures, including incentives for effective practices while introducing penalties for less sustainable ones. This would mean, the associated fees for the scheme are not just a way to recover recycling and/or disposal costs but rather be a meaningful subsidy for new circular practices.

*EPR NEEDS TO BE A
MEANINGFUL INCENTIVE FOR
NEW CIRCULAR PRACTICES*

Modulated fees offer a good way of doing this. Hence, the need to build up a harmonised eco-modulation system across the EU is requested. The modulated fees can be set using the minimum product requirements that would be specified in the ESPR.

In addition floor coverings must comply with the Construction Products Regulation and Essential Requirements defined in harmonised Standards for CE marking and other existing sector specific EU and national standards.

***MARKET CRITERIA AND
CIRCULAR PRINCIPLES SHOULD
DEFINE FEES***

With modulated based fees the costs of the actual collection and treatment incurred could be charged back based upon the company's market share, and/or size and factored according to eco-modulation of circular economy

principles. These principles must be applied to EU made floor coverings and imported floor coverings in the same way to allow for a level playing field.

There should not be any discrepancy between collective and individual schemes within the EU and a defined bonus-malus system should be applied based on the technical characteristics of the floorcovering which allow or inhibit circularity.

In cases where a producer provides a take-back system and ensures an own collection, sorting, reuse, and/or recycling scheme no additional EPR charge should be incurred, if by independent auditing it can be assured that non recovered volumes do not become a burden or general EPR systems. However, independent auditing has to be requested to ensure full compliance with the mandatory legal requirements and that appropriate management and treatment of waste is guaranteed.

***THE EPR FLOORING SCHEME
SHOULD ALLOW FOR
COLLECTIVE AND INDIVIDUAL
TAKE-BACK SYSTEMS WITH
INDEPENDENT AUDITING TAKING
AN ESSENTIAL ROLE TO VERIFY
COMPLIANCE***

Deposit return scheme could be part of the overall approach. This could be particularly important for certain type of products to enhance reuse instead of disposal such as event carpet tiles and loose laid rugs and runners. An appropriate cost and benefit analysis would be necessary considering all ecological and economical aspects.

***DRS COULD HAVE A KEY ROLE
TO ENHANCE REUSABILITY IN
CERTAIN TYPE OF CARPETS***

Some EPR experiences in other sectors show that most waste is still exported to facilities outside the EU where the treatment requirement are not subject to the same standards as in the EU.

This is problematic in several ways. Valuable secondary materials are transferred to other economies and will have to be replaced by primary materials often linked with the shift of environmental impacts outside the EU. This is in contradiction to circular economy principles and objectives.

Consequently, exports of valuable waste must be better controlled or even be banned in specific cases.

The review of the Waste Shipment Regulation provides a golden opportunity to solve these concerns. The industry would advocate for better controls, a clear definition of “equal conditions” for the treatment of flooring waste at export and improved enforcement of the requirement by the EU to keep valuable, recyclable material as much as possible within the new EU Circular Economy. Therefore, the question of whether waste exports should be allowed and if so, in what circumstances needs to be actively discussed without any prejudice.

VALUABLE WASTE IS ESSENTIAL TO ACHIEVE FULL CIRCULARITY AND MUST BE INCENTIVISED TO STAY WITHIN THE EU

To reach its full potential, a flooring EPR scheme must incorporate a mandatory digital product passport with all relevant information allowing for the appropriate traceability of the product, its valuable material content, the producer, importer/distributor, and retailer. Such a product passport would also allow the good functioning of the scheme including for the modulate fees approach. With the launch of the [GUT-PRODIS product passport](#) the foundations for carpets are already laid.

WE ADVOCATE FOR A MANDATORY DIGITAL PASSPORT FOR ALL PRODUCTS PLACED ON THE EU MARKET

To achieve our goals, we request that a ‘level playing field’ be guaranteed for all building materials, flooring categories and recycling technologies for importers, distributors, retailers, and EU manufacturers. The fair contribution of imported products to the EPR system should be recognised and ensured from the outset.

Joint efforts by all stakeholders including consumers are needed to implement transparent communication and discussion tools. This comprises doing the utmost to increase awareness and to change consumption behavior.

SHARED RESPONSIBILITY IN THE VALUE CHAIN AND INVOLVEMENT OF ALL KEY PLAYERS INCLUDING IMPORTERS AND NON EU PRODUCERS

As our contribution to transparent communication, we will present an annual report to communicate the progress of our efforts to all stakeholders.

With the foundation of [PolyCertEurope](#) we have, together with our partners, set the starting point to do this in the most harmonized way on the reporting of recycled content. Similar systems could be helpful when setting up sector specific EPR schemes with modulated fees, not only in the flooring sector.

*LEAVE NO ONE BEHIND, FULL
TRANSPARENCY, TRACEABILITY,
AND RESPONSIBILITY*

In this respect a modulated fee approach will also contribute to more products following the Design for circularity principles.

Green Public Procurement offers significant potential to drive demand for products and circular economy modelling but needs additional binding objective to allow for its full potential. Upcoming policy reviews need to be coherent with circular economy objectives and principles and better complement EPR schemes.

The infrastructure required to implement an EPR scheme needs to be developed including recycling facilities and technologies. European and national funding would be necessary through existing or foreseen mechanisms in the Green Deal to facilitate access to finances also innovation.

*MANDATORY GREEN PUBLIC
PROCUREMENT (GPP) OFFERS
SIGNIFICANT POTENTIAL FOR
CIRCULAR ECONOMY*

Moreover, the sector advocates for the creation of polymer and material pools for circular use and the development of chemical recycling techniques for mixed waste streams.

*“CLOSED LOOP” IS NOT A
SYNONYME FOR CIRCULARITY.
CIRCULARITY NEEDS
FLEXIBLE LOOP*

A real Circular economy needs to overcome the idea of closed loop system in favor of open loop ones. As the carpet industry represents only <2% of the plastic volume converted in Europe each year, we need the participation of other industries to develop these

polymer and material pools and to reach economic viability of chemical recycling techniques. We ask therefore for EU capital support for investments in modern industrial recycling capacity.



About ECRA

— (European Carpet and Rug Association)

Based in Brussels, Belgium, ECRA was established in 2004 and represents more than 40 leading carpet producers from six European countries. Together, our members account for approximately 90% of European textile wall-to-wall carpet production and 73% of EU consumption. As an international membership association, we actively participate in the CEN standardisation work and encourage the exchange of knowledge, ideas and experience between our members and stakeholders.

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