

ECRA POSITION ON EXTENDED PRODUCER RESPONSIBILITY FOR CARPETS

Brussels, 26.11.2024

Dear Mrs. Zalewska,

The European Carpet and Rug Association (ECRA) expresses its support for the implementation of an Extended Producer Responsibility (EPR) scheme for carpets within the European Union.

The sector is a key economy player and remains predominantly European. Europe is the second largest carpet market globally, with a significant portion of production occurring within the EU. As such the industry is a key part of the European supply chain.

The industry recognizes the critical importance of transitioning towards a circular economy as outlined in its own circular vision for 2030. Our aim is for all carpets in the EU market to be separately collected, reused, or fully recycled by 2030.

The carpet industry generates significant waste streams, and we are committed to addressing these challenges through a comprehensive EPR scheme. EPR is seen as crucial for initiating a shift from a linear to a circular economy. We advocate for a harmonized, EU-wide approach that extends producer responsibility to the post-consumer stage of the product lifecycle. This scheme should be designed to incentivize sustainable practices and innovation through modulated fees, ensuring a level playing field for all stakeholders.

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ECRA and the European Parliament both support the implementation of an Extended Producer Responsibility (EPR) scheme for carpets, but our approaches and priorities differ in several key areas:

Transition Period:

- **ECRA:** Advocates for a reasonable transition period to achieve full circularity, accepting "Waste to Energy", "Reuse of Chalk in Cement Kilns" as interim solutions.
- **European Parliament:** Proposes a shorter transition period for Member States to establish EPR schemes, reducing it from 30 months to 18 months.

Scheme Design:

- **ECRA:** Supports a tailor-made EPR scheme with modulated fees to incentivize sustainable practices and innovation. We emphasize the need for a **separate, mandatory and harmonized EU-wide scheme inclusive of all flooring types** to ensure a level playing field.
- **European Parliament:** Focuses on quicker implementation and stricter timelines. A separate scheme is not mandatory for Member States and the scope does not include all flooring types
- **ECRA:** Advocates for accepting "Waste to Energy" as interim solutions with a reasonable transition period.
- **European Parliament:** Assessment for textile waste reduction targets by 2025, including collection rates and phasing out landfilling.

To this end, ECRA would like to reiterate the industry shared vision to develop and implement an effective EU-EPR scheme for a sustainable and circular economy based on the following approach and priorities:

- **Harmonized Scheme:** ECRA supports a robust, EU-wide harmonized EPR scheme that ensures a level playing field for all stakeholders, including importers and non-EU producers.

- **Separate Collection Scheme:** ECRA strongly supports the implementation of an **EU wide mandatory and harmonised separate collection scheme**. This approach is crucial for achieving a level playing field. It is also essential for managing the bulky waste streams generated by carpets and for overcoming the challenges associated with collection and sorting infrastructure. This would enhance the circular economy potential of carpets, reduce waste, and promote sustainable practices across the industry.
- **Other Flooring Types:** ECRA's position on Extended Producer Responsibility (EPR) extends beyond carpets to include all flooring types and materials. We advocate for a scheme that covers various flooring categories. This approach aims to create a level playing field for all.
- **Modulated Fees:** ECRA advocate for modulated fees to incentivize sustainable practices and innovation. These fees should be based on eco-modulation principles, rewarding circular economy practices and penalizing less sustainable ones. **ECRA do not support a volume or mass-based approach**
- **Digital Product Passport:** ECRA proposes a mandatory digital product passport to ensure traceability and support the functioning of the EPR scheme. This passport would contain all relevant information about the product, its material content, and its lifecycle.
- **Green Public Procurement:** ECRA sees significant potential in Green Public Procurement to drive demand for circular economy products. We call for additional binding objectives to fully realize this potential.
- **Infrastructure and Funding:** The development of recycling facilities and technologies is crucial. ECRA calls for European and national funding to support these initiatives, ensuring the necessary infrastructure is in place.
- **Transparency and Responsibility:** the EPR scheme must allow for collective and individual take-back systems with independent auditing taking an essential role to verify compliance
- **Deposit Return Scheme (DRS):** ECRA believes DRS could have a key role to enhance reusability in certain

types of carpet such as event carpet, tiles and loose laid rugs and runners; and could be part of the overall approach

- **Export Controls:** ECRA highlights the need for better control or even a ban on the export of valuable waste to ensure that recyclable materials remain within the EU
- **Overlap and Integration:** Carpets fall under both the construction products (CPR) and textiles categories (ESPR), which means they are subject to EPR Regulations for both sectors. This dual classification creates a unique set of challenges for managing carpet waste and promoting circular economy practices. Addressing these challenges requires coordinated efforts from policymakers, industry stakeholders, and companies to harmonize regulations, streamline compliance processes, and promote innovation in waste management practices. These challenges are:

1. Complex Regulatory Compliance: Companies must navigate and comply with two sets of regulations, which can be complex and time-consuming. Each EPR scheme has its own requirements for labelling, documentation, and reporting, leading to increased administrative burdens.

2. Inconsistent Waste Management Practices: The dual classification can result in inconsistent waste management practices. Carpets may be treated differently depending on whether they are classified as construction products or textiles, leading to confusion and inefficiencies in collection, sorting, and recycling processes

3. Increased Costs: Complying with both EPR schemes can lead to higher costs for companies. They may need to invest in additional infrastructure, technology, and personnel to meet the requirements of both schemes. This can be particularly challenging for small and medium-sized enterprises (SMEs) with limited resources.

4. Coordination and Harmonization Issues: The lack of coordination and harmonization between the two EPR schemes can create challenges for companies. They may face difficulties in aligning their waste management practices with the requirements of both schemes, leading to potential conflicts and inefficiencies.

5. Market Disruption: The dual classification can disrupt the market by creating an uneven playing field. Companies that are

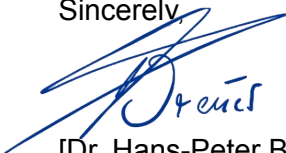
better equipped to handle the dual compliance requirements may gain a competitive advantage, while others may struggle to keep up. Moreover other floor coverings do not have a dual classification.

6. Innovation and Design Constraints: The dual classification can also constrain innovation and product design. Companies may need to design their carpets to meet the requirements of both EPR schemes, which can limit their ability to innovate and develop new products.

7. Environmental Impact: The dual classification can impact the environmental performance of carpets. Inconsistent waste management practices and increased administrative burdens can hinder efforts to promote recycling and reuse, ultimately affecting the circular economy goals in a negative way.

In conclusion, the European Carpet and Rug Association (ECRA) firmly believes that the implementation of a separate, mandatory and harmonized, EU-wide Extended Producer Responsibility (EPR) scheme covering all floorings is essential for transitioning the flooring industry towards a circular economy. By extending producer responsibility to the post-consumer stage, we can ensure that all floorings placed on the EU market are separately collected, reused, or fully recycled by 2030. ECRA is committed to collaborating with the European Parliament and other EU Institutions to achieve our shared vision of a sustainable and circular economy for carpets and other flooring types. Together, we can create a robust framework that not only addresses the environmental challenges but also fosters innovation and economic growth within the industry. Thank you for your attention to this important matter. We look forward to your support and cooperation in making this vision a reality.

Sincerely,



[Dr. Hans-Peter Breuer]

[Director General]

European Carpet and Rug Association (ECRA)