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LUMINOUS INSIGHTS

Research Article

# The EU Textile Strategy: How to Avoid Overproduction and Overconsumption Measures in Environmental Policy

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ABSTRACT

The environmental impact of clothing has become critical in recent decades and the growing volume of products in circulation plays a main role. The European Union's Strategy for Sustainable and Circular Textiles is a particularly influential policy in this area given the number of regulatory instruments included and their global influence. However, this study highlights the limitations of this Strategy in reversing the trend of growing production and consumption volumes due to its focus on the product level, specifically on product durability. Based on the analysis of public documents and interviews with participants of the policy making process, the study unpacks the factors that enabled such a decision, and how it was integrated in the final document. The analysis shows that by focusing on product durability, an explicit aim to reduce the volume of clothing was avoided, leaving potentially impactful marketing-related measures out of the scope. Two main factors leading to this exclusion are identified: (a) the framing of the Strategy in terms of competitiveness, and (b) a policy-making process prioritizing input from anecdotal rather than scientific knowledge. The study concludes with recommendations to advance knowledge and policy initiatives in marketing-related environmental policy for production and consumption reductions.

KEYWORDS

*Clothing, Product Demand, Product Durability, Production and Consumption Volumes, and Sustainable Marketing Policy*

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## 1. Introduction

The volume of clothing consumed in Europe has increased dramatically in the last decades, with significant environmental damage globally (Manshoven et al., 2023; Niinimäki et al., 2020). While early environmental policy to mitigate such damage focused on better production and waste management, more recently, increasing product durability to extend product lifetime has become a central approach. In a review of EU and Norwegian environmental policy applicable to consumer goods, including clothing, Heidenstrøm et al. (2021) found a massive increase in product longevity related measures in 2015-2020 in line with the growing influence of the circular economy framework. The EU Strategy for Sustainable and Circular Textiles issued in March 2022 is one such case, and a particularly influential one given its scope, application, and its influence on the global textile industry going forward.

The EU Textile Strategy proposes to

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> (H)elp the EU shift to a climate-neutral, circular economy where products are designed to be more durable, reusable, repairable and recyclable. It aims to ensure that the textile industry recovers from the COVID-19 crisis in a sustainable and competitive way by applying circular economy principles to production, products, consumption, waste management and secondary raw materials (European Commission, 2022a).

The strategic document is now operationalized in different regulatory measures. These include the Waste Framework Directive (including Extended Producer Responsibility), Eco-design for Sustainable Products Regulation (including Digital Product Passports) and Green Claims Directive, where it is still up for debate if the Product Environmental Footprint will be included. All in all, there are 16 new forthcoming directives and regulations that apply to apparel, where directives need delegated acts in each country, and regulations supersede each country's national laws.

This research focuses on the development of the EU Textile Strategy itself as a guiding document for all associated regulations, with significant global implications. The EU is the biggest importer of apparel globally (World Trade Organization, 2023) and requirements from this region are expected to impact global markets, including other production, trade, consumption and waste intensive areas overseas. It is the most ambitious environmental policy applied to apparel and textiles globally and will probably play an influential role in future policy developments elsewhere.

More specifically, this study focuses on how the Strategy intends to reverse the current growth in production and consumption volume through product durability. A critical analysis of this approach is relevant because, as we will explain below, the expected effects of product durability on production volume are questionable and not supported by empirical research. Moreover, the focus on product durability leads to regulation at the product level (on product design, product labeling, etc.), leaving other areas of regulation behind. Remarkably, marketing-oriented actions with potential to confront overconsumption and overproduction are absent from the Strategy.

According to a recent review (Ray and Nayak, 2023) scholarly efforts in sustainable marketing applied to fashion have mostly focused on supporting the competitive advantage of "sustainable fashion" products, while none of the studies reviewed discuss if or how consumption of more sustainable product reduces the demand for less sustainable products. These publications acknowledge the agency of consumer behavior as a driver of production, but do not question the role of marketing in boosting demand and its potential role in reducing it, leading to fewer products being made.

Another review focuses specifically on marketing as a tool to promote sufficient consumption levels across sectors (Gossen et al., 2019). The study discusses existing and possible efforts to discourage overconsumption through commercial marketing, of which the case of the "don't buy this jacket" campaign by outdoor company Patagonia is considered paradigmatic (Hwang et al., 2016; Reich and Soule, 2016).

However, the strategies and effect of marketing-oriented public policy for demand reduction in the apparel sector have not been the focus of sustainable marketing research; nor has environmental policy for consumer goods emphasized marketing regulation. Pricing, social media, and retail strategies are important marketing variables affecting demand that can be included in consumer goods environmental policy. For instance, marketing research has found that free returns and buy-now-pay-later services offered by online retail platforms increase impulse buying online (Fook and McNeill, 2020), so addressing such business practices in policy could be particularly impactful.

Policy and regulation aimed at reducing the consumption of other products, most remarkably tobacco, has focused strongly on marketing regulation and restrictions, and has received much scholarly attention. There is a body of research about the effect of different measures, discussing a variety of possible regulation and interventions from advertising, sponsorship, and promotion restrictions to public education activities. Taxation and price are found to be the most important factors affecting tobacco consumption (Studlar et al., 2011). The research on policy to reduce tobacco consumption also

offers knowledge about the tobacco industry's strategies for influencing legislation (Neuman et al., 2002).

In the EU Textile Strategy, however, the focus on marketing is marginal. The document condemns the increasing frequency of new collections and products released to the market, but this is not translated into any concrete instrument to halt these practices. There are measures to control false green claims about products, but the role of marketing in driving fashion's overconsumption is overlooked. The influence of low prices on rising demand, and the potential measures that could revert the current "race to the bottom" are not addressed. The Strategy's vision for 2030 is that consumers will benefit from "high quality affordable textiles", suggesting that pricing measures such as the ones applying to tobacco products are not going to be applied.

In framing the environmental challenges of the textile and clothing sectors in terms of growing production and consumption volumes, while proposing solutions focused on the attributes of individual products (specifically their material durability), the Strategy closes the door for other possible actions that could tackle production and consumption volumes directly. These include marketing related measures as applied to the tobacco sector. This study aims at understanding the process that made this omission possible, explaining it through a choice of policy makers to focus on product durability as a central solution to tackle the growing clothing volume, despite its questionable effect.

## 2. Literature Review

### *2.1 Durability and volume*

Achieving environmental savings from keeping products and materials longer in use presumes that there will be a reduction in the demand and production of new items, but this expected effect has not been sufficiently studied and might be different for different product groups. Some key shortcomings of this approach are that it does not acknowledge the phenomenon of material accumulation (Jaeger-Erben et al., 2023) and the rebound effects resulting from consumer behavior (Baczyk et al., 2024).

A recent review has mapped the empirical base of the literature linking product longevity and environmental savings, to identify an alarming lack of research on the human behavior that would make the connection between product lifetime extension and smaller product quantities or volume possible (Maldini et al., Forthcoming). The empirical evidence that is used to support the durability approach is limited to comparative life cycle assessments of products with longer and shorter life (e.g., WRAP, 2017). Such studies build on a view of consumption that assumes but does not test the idea that durable goods delay replacement purchases, and they implicitly consider production decisions by companies as a process driven exclusively by demand, therefore taking the associated savings in the manufacture of new products for granted (Maldini et al., Forthcoming).

However, research suggests that this thinking does not apply to clothing. Wardrobe studies and waste audits of textiles (see Laitala and Klepp, 2022 for a review) show that garments and footwear are massively discarded while still in good material condition. Moreover, only a minority of clothing purchases are motivated by product replacement (Maldini, 2019). The drivers of production volume decisions by clothing companies have not been thoroughly investigated, but a few case studies point to a variety of reasons behind such decisions, exceeding mere consumer demand and including companies' market expansion plans and the strengthening of their partnership with suppliers (see e.g., Paton, 2018). Furthermore, overproduction practices beyond demand lead to substantial obsolete inventory along the supply chain. For instance, Wijnia (2016) estimates that this accounts for 2.3% at the level of production, 13.5% at the level of wholesale and 35.2% at the level of retail. In short, research on clothing does not support the assumed effect of product durability on production volume reductions.

### *2.2 The EU Strategy for Sustainable and Circular Textiles*

The EU Textile Strategy has been the object of previous research. Bour et al. (2023) state that the current regulatory framework is not yet in place to support its vision of a circular textile economy free form hazardous substances. The authors argue that the amount of textile waste will grow in Europe and that this calls for an in-depth investigation of the environmental risks

of already existing textile waste, and that chemicals of concern are eliminated from the market. Puglia et al. (2024), in turn, offer a canvas tool to map the policy instruments envisioned by the Strategy systematically and visually. The study finds the Strategy to support the growth of a circular economy in the fashion and textiles industry, but it warns that such growth does not necessarily displace linear practices. Therefore, more explicit measures to phase out the linear characteristics of economic activities are recommended. The authors identify an uneven distribution of policy support across the clothing lifecycle, with measures clustered mainly in the head (i.e. Sourcing and Production) and tail (i.e. Collection and Recovery) of the life cycle with only a few measures in the core (i.e. Pre-Consumption and Consumption) and very few in the outer core (i.e. Distribution and Post-Consumption). The analysis highlights that the designed policy instruments may not achieve their desired impact unless they simultaneously promote sufficiency and target waste prevention.

Lastly, Monseau et al. (2024) focus on the challenges for the Strategy's implementation. The authors highlight that this policy enters a space already governed by a variety of private and public schemes that have so far failed to create meaningful change. They call for EU's awareness of the different benefits and disadvantages of private and public regulations and stress the importance of trust by citizens as a condition for successful implementation. Although some of the shortcomings of the Strategy and its associated policy instruments have been highlighted in previous research, such studies do not aim at uncovering the reasons behind the focus of the policy. We contribute to this knowledge by understanding the content of the Strategy as a result of decisions taken during the policy making process.

## 3. Research Question

The introduction of the Strategy acknowledges that the core problem in the sector is that "the production and consumption of textile products continue to grow and so does their impact on climate, on water and energy consumption and on the environment" (European Commission, 2022b, p. 1). However, when solutions are presented, the document states that "(e)xtending the life of textile products is the most effective way of significantly reducing their impact on the climate and the environment" (European Commission, 2022b, p. 3).

In line with previous research on resistance to production and consumption reductions measures in policy (Lorek and Fuchs, 2013; O'Rourke and Lollo, 2015), this study highlights that the choice for a product-level scope in the Strategy (limiting actions to tackle volume to durability, and leaving potentially impactful marketing-oriented actions out) is not accidental. The research question set to guide the analysis is: How did the policy making process of the Strategy (the EU Strategy for Sustainable and Circular Textiles) prioritize product durability rather than production and consumption volume reductions?

## 4. Methods

In order to answer the question above, four elements of policy analysis are addressed: context, discourse, actors, and knowledge base. These are discussed in more detail below. The sources of data are publicly available documents, complemented by interviews with five key participants in the development of the Strategy to address all the stages of the process. While there are publicly available documents about specific phases of the Strategy development (see Table 1), other instances were based on verbal communication, and it is unknown to us if these were documented. Therefore, participants in these instances were interviewed to build a more complete picture. Section 5.1 explains the different stages of the policy making process in more detail.

The interviews, conducted online between February and April 2023 and lasting 45 minutes each, were intended to collect undocumented information about the process, so the questions asked focused on the activities performed by interviewees. The approval of an external ethical committee was requested and received after conducting the interviews, which were audio recorded and transcribed. The interviewees include one key employee of the European Commission, two members of external organizations that participated in the development of the Strategy from the early phase until it was released, and two key participants (and invited speakers) of the public consultation workshops. Based on the request of the interviewees, their

Table 1: Sources about the different stages of the policy development used in this study

| Stages in the policy making process | Period | Publicly available documents consulted | Interviews conducted |
|---|---|---|---|
| Initial stages | | | Interviews |
| Roadmap | January-February 2021 | Roadmap document and feedback received (European Commission, 2021) | |
| Public consultation (survey) | May-August 2021 | Questionnaire questions, answers, and summary report (European Commission, 2022a) | |
| Public consultation (workshops) | May-August 2021 | | Interviews |
| Analysis of the public consultation outcomes | August-September 2021 | Public consultation report (PlanMiljø, 2022) | |
| Development of the Strategy document | | | Interviews |
| Commission adoption | March 2022 | Strategy document (European Commission, 2022b) | |

*Note:* This table presents the timeline and sources used to analyze the different stages of the policy development process.

identities are not disclosed.

The selection of relevant participants for the interviews was highly influenced by their willingness to cooperate and sharing information. We searched for and contacted other potential interviewees that were involved, who either did not reply or refused our invitation. Given that there is no public information about who participated in the discussions in the different stages, we relied on the indication of some of the participants. Although the information requested from interviewees was factual and not personal, they chose to remain anonymous, showing that the policy making process is regarded as one that calls for some level of secrecy.

The method for the analysis is chosen to cover central aspects in the policy making processes. Taylor (1997) argues for attention to (a) the context in which policies are developed, (b) the text or discourse, and (c) the consequences of the policy, to get a "strategically and politically useful" understanding of policies (Taylor, 1997, p. 32). Leipold et al. (2019) state that the study of discourse and text is still a main approach in the field. To these, Ernst and Fuchs (2022) add key actors in the policy making process (and their influence) as an important object of study. Given that the consequences of the EU Strategy for Sustainable and Circular Textiles are still unknown, this study focuses on context (section 5.1), actors and (section 5.2) discourse (section 5.3). To the elements suggested in the literature, we add a fourth one in line with the research question: the knowledge base of the Strategy, aimed at identifying the sources of information that were considered to state that product lifetime extension is the most effective solution to reduce the impact of the sector (section 5.4).

The analysis of context relies on what is written about the Strategy and its relation to other policy efforts in official documents, including the Roadmap (European Commission, 2021), and on the perception of interviewees. The actors involved in discussions were also mentioned by interviewees, while the list of respondents to the public consultation survey is publicly available (European Commission, 2022a). The analysis of discourse focuses on the questions and answers of the public consultation survey (ibid.) and the content discussed during the workshops, as reported by interviewees. The report of the public consultation (PlanMiljø, 2022) and the final Strategy document (European Commission, 2022b) are also addresseed in this section. Lastly, the knowledge base analysis builds on a review of the documents cited in the footnotes of the Strategy document (ibid.) with special attention to those addressing product durability and production and consumption volumes.

## 5. Results and Analysis

As noted in the quotes of the Strategy included in section 3, the document frames the environmental challenges of the sector in terms of volumes, and highlights product durability as the most impactful approach to tackle such challenges. These statements are made despite the contested relation between product durability and volumes introduced in section 2.1 of this study. The sections 5.1 to 5.4 will be answering how this was enabled by the policy making process.

### *5.1 Context: Developing the Strategy*

The Strategy aims at implementing the commitments of the European Green Deal (European Commission, 2019) and the Circular Economy Action Plan (CEAP) (European Commission, 2020a), as well as the Industrial Strategy (European Commission, 2020b) and post-COVID Recovery Plan (European Commission, 2020c). According to the interviews, its origins go back to 2018, when the European Commission (EC) was preparing their CEAP and they noticed increasing willingness by textile and apparel industries in mainstreaming sustainability practices. In 2019, the European Green Deal identified this sector as a resource intensive sector. Moreover, the CEAP and Industrial Strategy mentioned it as a key sector to focus on. Textiles were considered poorly regulated, and the EC committed to intervene. Within the EC, Directorate General (DG) Environment was assigned the formal lead, and DG Grow (responsible for Internal Market, Industry, Entrepreneurship and SMEs) shared a similar level of participation (European Commission, 2021).

Following the Commission's decision to develop the Strategy (see Table 1), a roadmap was proposed and

open for public feedback in 2021 (European Commission, 2021). The final outline included a public consultation period outsourced to a consultancy. It consisted of an online survey with the possibility of uploading complementary documents, and a series of online workshops (PlanMiljø, 2022). The input gathered in the consultation was included in the Strategy in the context of internal EC negotiations. Draft versions were circulated for comments across key stakeholders and the final text was under the responsibility of the staff of DG Environment, released in March 2022.

Therefore, when the influence of context on the framing of the Strategy is considered, the double aim of competitiveness and environmental sustainability comes from the early stages. The EU's CEAP has a two-side agenda focusing on the transformation of industrial processes, increasing resource efficiency, reducing environmental impact and the use of raw materials and hence bringing economic benefits and business opportunities to companies (European Commission, 2020a). Furthermore, the environmental targets of the Green Deal were matched with the Industrial Strategy, and the economic concerns about recovery of the EU from the COVID-19 crisis. The shared responsibility of DG Environment and DG Grow in the development of the Strategy reinforced this two-sided nature. In this context, the narrative of value retention associated to the circular economy was a good fit, as was product durability. Arguably, stated aims of reducing production and consumption volume would have been more controversial in a strategy focused also on economic growth.

### *5.2 Actors: Organizations Involved in Developing the Strategy*

The nature of the actors involved in the initial phase of the Strategy, a period of incubation leading to the decision to develop a strategy for textiles (2018-2020), is not mentioned in public documents. But one of our interviewees, a member of the European Commission (EC) who requested not to be quoted, mentioned the key role of industry organizations in facilitating input from stakeholders during this phase. Overall, the following organizations were mentioned by interviewees as participating in early meetings with the EC (in alphabetical order):

- Ellen McArthur Foundation: a foundation promoting the circular economy as a concept in global company and public policy, with a corporate focus, and strategic partners including Coca-Cola, Ikea, Unilever, H&M, Visa, and Gucci among others.
- EURATEX: a confederation representing European apparel and textile industries in Brussels, with core partners including Inditex (owner of Zara among other brands).
- European Environmental Agency: an agency of the EU providing independent knowledge and information to EU institutions, member countries, and the public.
- European Environmental Bureau: an NGO representing a network of environmental citizens' groups.
- Federation of the European Sporting Goods Industry
- Global Fashion Agenda: an alliance of apparel brands which grew out of the Nordic Fashion Association, fostering industry collaboration on sustainability, with strategic partners such as Asos, H&M and Nike.

The emphasis is on businesses offering apparel. Companies were main stakeholders also during the public consultation. Half of all 544 stakeholders answering the survey were either businesses or business associations. Their main activities within the sector were manufacturers of new textiles and clothing (23.3% of all entries), technology R&D (10.3%) and brands & retailers (9.7%), followed by organisations processing post-consumer textiles: waste collectors (3.5%); recyclers (2.9%), collectors of used textiles (2.6%), processors/wholesalers of used textiles (0.6%) and second-hand retailers (0.6%). The other half were from other actors including citizens, NGOs, academics, public authorities, environmental organizations, trade unions, and consumer organizations (PlanMiljø, 2022).

For each of the online workshops that were part of the consultation, our EC interviewee reported sending 50 targeted invitations, plus an untargeted invita-

tion circulated to fill 20-30 extra places. The final list of participants was managed by the public consultation contractor PlanMiljø and adjusted by DG Environment and DG Grow. Each workshop started with EC staff introducing the activities and one or more presentations given by either EC experts on the specific topic or by external speakers, to set the scene for the stakeholders through content. Lastly, the stakeholders were split into discussion rooms. There are no public records of workshop participants, but in our interviews with some of them, they noted that the overwhelming majority were business actors including brands, manufacturers, and resellers.

The profile of the participating stakeholders had a strong influence on the content and results of the Roadmap, the public consultation, and the final Strategy document adopted, as confirmed by our interviews. Our interviewee from the EC was satisfied with the outcomes of the public consultation, as they validated their ongoing contact with industry stakeholders since the initial phase. On the other hand, our NGO interviewee (a policy officer participating in the public consultation on behalf of civil society) felt that the opportunities to provide meaningful input were limited: "I was frustrated with the consultation process because I felt that the questions being asked were not the right questions. From what is being asked, you already feel that the strategy will not match our recommendations."

In short, corporations and business associations were central actors in the policy making process. They provided informal input in the preparatory phases of the Strategy, setting the stage for a consultation process that also emphasized companies as main stakeholders. Although the online survey was accessible to anyone, companies had the capacity and motivation to provide extensive input, while the representation of other stakeholders was limited. It is natural for companies to have a strong interest in participating, since the upcoming regulations will affect their activities directly. However, the market for clothes and thereby the offer to citizens will also be affected. The regulations will also influence the demand for materials and thereby all other actors involved in the complex value chain for clothes and other textiles, for instance farmers in and outside the EU. Considering companies' input is essential to develop policies with good levels of adherence. On the other hand, and as we will discuss in the sections below, an environmental policy building mostly on the input of companies making and selling apparel is expected to be restricted in terms of the level of change envisioned. Targeting scientists as key actors in the process could have helped to consider company proposals in relation to scientific knowledge about clothing's environmental impact and effective solutions. Involving social scientists could have also provided a way of indirect citizen representation by considering knowledge about clothing use. Lastly, promoting the participation of specific activist and civil society organizations in the early stages would have helped to balance the political agenda of mainly global business actors.

### *5.3 Discourse: Durability and Production Volume in the Public Consultation*

This section focuses on the public consultation process of the Strategy to better understand the discourse around product durability and production volumes. As a key tool of the public consultation process, the online survey contained 12 multiple-choice questions and it was divided into 3 areas. Much of the main section (section 2) focused on the perceived importance that respondents assigned to measures that could be implemented in the Strategy. For instance, question 2.1.1: Which elements of circularity in the value chain do you consider should be tackled as a priority? and question 2.5.1: How would you assess the relative importance of the following measures to promote sustainable consumption behavior at EU level? Eight answer choices were offered for each of the questions. These and other similar questions provided an opportunity for respondents to suggest additional, not listed options. The answers to the survey are publicly available and they have been analyzed. In Table 2 below, the content of the survey questions is compared with the answers given by respondents in free format fields. The aim is to understand the importance of durability and volume-related measures for the designers of the survey vs. its respondents. The analysis is limited to answers provided in English language (50% of all 544 answers) and to the words visible in the table. The survey includes

Table 2: Occurrence of volume and durability related words in the survey

| Words | Occurrence in questions and multiple choice answers (by survey designers) | Occurrence in answers in free fields (by survey respondents) |
|---|---|---|
| quantity | 0 | 21 |
| volume | 0 | 26 |
| overproduction | 0 | 70 |
| overconsumption | 1 | 37 |
| **Total volume-related** | **1** | **154** |
| durability | 3 | 99 |
| durable | 2 | 35 |
| lifetime | 2 | 29 |
| **Total durability-related** | **7** | **163** |

*Source:* Our analysis of the public consultation survey (European Commission, 2022a) based on a simple word count, no coding or further interpretation methods were used.

many other topics that have not been analyzed. Table 2 focuses on the concepts that are most relevant for this study's research question.

The table shows that the words "quantity", "volume", and "overproduction" are absent from the questions or multiple choice answers provided in the survey. The word "overconsumption" shows up once, as one of the possible choices to question 2.5.1 above: "Organize EU-wide awareness campaigns, education and training to promote sustainable textiles use and address overconsumption (e.g. fast fashion)". On the other hand, durability-related words appear often, with an occurrence 7 times higher than volume-related words.

When answers to the survey are analyzed, the occurrence of volume- and durability-related words is close to equal, with volume mentioned 154 times and durability 163 times. This means that volume-related measures were barely considered by the survey designers. However, stakeholders reacted quite consistently to their absence and mentioned them with a similar level of importance when compared to durability measures. Within the volume-related words, survey questions mention only overconsumption. The answers, on the other hand, are more concerned with too many clothes being produced (overproduction), than consumed (overconsumption). Although the report of the public consultation mentions briefly that "(s)everal NGOs and government representatives argued that there is also a critical need to reduce the volume of textile products consumed in Europe" (Plan-Miljø, 2022), only durability makes it to the concrete solutions listed in the Strategy (in section 2.1 of the Strategy). The challenges of growing production are completely left out, despite "overproduction" being the second most frequently mentioned word in answers, after "durability".

The topics of the six online workshops during the second phase of the public consultation did not provide many opportunities to discuss the issue of volume either, except for workshops 3 and 4 addressing, among other issues, production and consumption volume and product durability. Two of our interviewees were speakers at these workshops, and their experiences are reported below.

In workshop 4, addressing eco-design, a speaker from an NGO focusing on the technical aspects of products and one of our interviewees was invited to introduce participants to the topic. The presentation

put emphasis on the importance of design for durability and repairability, moving beyond a "closing the loop" agenda promoting recycling and reuse to a "slowing the loop" approach. Workshops organizers asked clarifying questions to the speaker in preparation for the event, but the speaker stated to have "presented [their] report with the frame that [they] had in mind". The presentation included a quantitative estimation of the environmental benefits of product longevity based on an assumed associated decline of production volume. However, this link was not explicitly discussed in the event. The reaction of participants to the presentation was overall positive, with some participants questioning if longevity was always desired, and the trade-offs regarding microplastics and the impact of laundry were discussed.

In line with the workshop described above, section 2.1 of the Strategy ("Introducing mandatory Eco-design requirements"), states that "(e)xtending the life of textile products is the most effective way of significantly reducing their impact on the climate and the environment. To achieve this, product design has a key role" (European Commission, 2022b, p. 3).

In workshop 3, addressing sustainable consumption, an academic specialized in fashion and sustainability was invited to introduce participants to the topic. The scholar put together a presentation summarizing relevant and updated knowledge gathered from several colleagues from European and North American universities. In our interview, the researcher stated that:

> In those slides, there was a slide on volumes in which I said, we need to reduce volumes, (…) we need to reduce the material throughput of the system and we need to reduce consumption volumes. Overconsumption has gone out of hand. And [the workshop organiser] got back to me saying: I don't think the commission would want you to put this on. I answered that I could tune it down, but not take it out, because I think it's very important. [The workshop organiser] really didn't like that, (…) it was quite unpleasant for me. And I was happy with myself because despite the fact that they made me trim my slides, I still spoke about it.

Later, during the discussion session, the speaker was consistently discredited by workshop participants, most of which were business stakeholders. Although sustainable consumption was the topic of the event, the interviewee described it as an "industry-focused workshop", with "no associations representing consumers".

In line with the analysis above, the Strategy does not include straight forward measures addressing overproduction and overconsumption. Despite its title, section 3.2 of the Strategy on "Reversing the overproduction and overconsumption of clothing" explicitly focuses on the Eco-design Requirements (2.1) and Extended Producer Responsibility (2.6) measures, with a questionable relation to the title that frames them. Additionally, companies "are strongly encouraged to internalize circularity principles and business models, reduce the number of collections per year, take responsibility and act to minimize their carbon and environmental footprints" (European Commission, 2022b, p. 8). However, and unlike the durability measures included in the Ecodesign for Sustainable Products Regulation previously mentioned, the way this change is going to be achieved is not mentioned, and actions promoting reductions in the number of collections per year are not listed in the key actions of the Strategy annex. No targets or monitoring plans to tackle overproduction or overconsumption are mentioned.

In sum, the analysis in this section suggests that measures aimed at reducing production and/or consumption volumes were out of the scope of this Strategy already from early stages. The public consultation process was designed, conducted, and analyzed in a way that ensured this exclusion, despite the efforts of some stakeholders and many survey respondents in bringing this issue to the table. The final document does not propose any mechanisms to check and ensure that these have an effect in volume reduction or on the environmental impact for that matter. When asked about the reasons behind this absence, interviewees agree that the economic agenda of the EC in a post-Covid context, and the key participation of DG Grow in the development of the Strategy, did not allow for volume-related measures.

Table 3: References in the EU Textile Strategy

| Total number of references | Publications cited (excludes duplicated publications) | Publications cited as sources of information (excludes other policy documents) | Sources of information classified | Nr. | Non-peer reviewed reports classified | Nr. |
|---|---|---|---|---|---|---|
| 73 | 56 | 21 | Peer reviewed scientific articles | 3 | | |
| | | | Non-peer reviewed reports | 18 | By EU organizations | 12 |
| | | | | | By other organizations | 6 |

### *5.4 Knowledge base: References in the Strategy*

This section analyses the literature references cited in the Strategy to understand the knowledge on which the document builds. The publications regarding product lifetime extension and its effects have been followed to their sources.

Table 3 summarizes the references included in the Strategy document. There are 73 footnotes, referring to 56 documents or web links. Most of these (35 out of 56) are policy documents or initiatives, they indicate previous or ongoing efforts that are relevant for the Strategy. The rest of the documents (21 out of 56) can be considered the main body of knowledge on which the Strategy is based. These include three scientific references to peer-reviewed articles focusing on design for upcycling (Aus et al., 2021) and microplastics (McIlwraith et al., 2019; Napper et al., 2020) and 18 non-peer-reviewed reports. Twelve of these reports are issued or commissioned by EU organizations, such as EEA; and the other six by other organizations, such as the Ellen McArthur Foundation. The non-peer-reviewed reports are partly based on peer-reviewed sources. However, they have not gone through a controlled process of revision by unbiased and anonymous experts themselves. Moreover, the expressed aim of some of these publications is to promote a specific policy agenda in line with the values of the organization, they are not necessarily aimed at presenting a complete or objective picture of the state of the art for environmental problems and solutions. Therefore, the knowledge base of the Strategy is not very rigorous, and it is highly politicized.

A focus on the main statement for the research question of this study "(e)xtending the life of textile products is the most effective way of significantly reducing their impact on the climate and the environment" (European Commission, 2022b, p. 3), leads to a report published by the Environmental Coalition on Standards, an NGO focusing on environmental standards for consumer products (ECOS, 2021). The main knowledge base of the ECOS report comes from 12 non-peer-reviewed reports issued by non-academic organizations. Publications authored by the UK-based organization WRAP dominate this category. WRAP, a climate action NGO, authored an early and influential report in 2012, estimating the environmental impact of

UK clothing consumption. Extending the active life of garments was a core recommendation, and estimations concluded that "(e)xtending the life of clothing by an extra nine months of active use would reduce carbon, waste and water footprints by around 20-30% each" (WRAP, 2012a, p. 5). The limitations of these estimations are acknowledged, and an annex report explains the assumed relation between lifetime and volume that underlies it: "The longer that clothing is used, then primarily based on an assumed requirement of less new clothing (and hence their production, distribution and retail), the lower the expected environmental footprint per annum" (WRAP, 2012b, p. 3).

In 2017, a second report was published by WRAP to show the results from product lifetime extension and other efforts in the UK during these 5 years. The in-between-reports period saw a considerable increase in new clothing demand in the UK, leading to growing impact of national clothing consumption. The authors state that "(b)etter ways of designing and producing clothing are on the increase, but there is a risk that these improvements could be undermined by a rise in the amount of clothes being bought" (WRAP, 2017, p. 11). They acknowledge the difference in focusing on lifetime and volume, implicitly contesting their previous assumptions:

> The increased quantity of clothing now being purchased in the UK means that there will be a higher environmental impact from its production. However, people are keeping their clothes just as long, if not longer, than they used to. Garments that last longer reduce production and processing impacts, but only if new purchases are avoided (WRAP, 2017, p. 11).

Although WRAP's (2017) report is included in the reference list of the ECOS publication, the latter does not refer to volume reduction as a condition for effective durability measures. The focus of ECOS on product standards requirements may explain this omission. Broader measures regulating the activity of companies, for instance, are outside their scope. What is most remarkable is that this important note and the UK experience with clothing durability strategy are overlooked by the EU Strategy. The Strategy makes the same assumption that was made ten years earlier, where indirect measures proved to be ineffective in reducing the volume and therefore the footprint of clothing consumption.

The limitations of durability are known among scientists working in the field of the environmental impact of clothing and stated in publications referred to in the Strategy. However, the knowledge management in the policy making process of the Strategy did not prioritize reliability and completeness of information. In using secondary and tertiary non peer reviewed sources as a knowledge base, and not always considering the context of the information presented, the information was simplified and generalized to an extent where the meaning of the original sources changed. In this way, the Strategy manages to avoid building on the knowledge and experiences of a 10-year-old similar policy from the UK.

In the Strategy, the growing quantity of garments is seen as a consequence, rather than a cause, of shorter clothing life spans. "The trends of using garments for ever shorter periods before throwing them away contribute the most to unsustainable patterns of overproduction and overconsumption" (European Commission, 2022b, p. 1) explains the Strategy, overlooking the lack of evidence underlying this statement. A critical analysis of the state of the art in scientific knowledge would have confronted the approach outlined above, but the knowledge management in the policy making process did not prioritize reliability and completeness of information. Members of the scientific community stressing the centrality of production volume were discredited, and the focus was placed on ensuring adherence from businesses. In using secondary, tertiary, and non-peer reviewed sources as a knowledge base, the information was simplified and generalized to an extent where it met the anecdotal knowledge shared by involved stakeholders.

## 6. Conclusions

In light of the lack of measures seeking production and consumption volume reductions in the EU Strategy for Sustainable and Circular Textiles, and the exclusion

of significant marketing-oriented regulation, this study asked: How did the policy making process of the Strategy prioritize product durability rather than production and consumption volume reductions?

The analysis shows how the focus on product durability assisted in avoiding production volume reductions measures, leading to the exclusion of marketing-oriented regulation (applied to price, frequency of new products put on the market, product placement with influencers, advertising including social media strategy, etc.), which could have a significant effect in tackling overproduction and overconsumption.

The factors hindering the inclusion of measures to reduce the quantity of products are identified, namely: a) the framing of the Strategy in terms of competitiveness, with a focus on companies as main stakeholders, and the associated fear of economic decline in a market where fewer products are sold, and b) a policy-making process prioritizing input from anecdotal knowledge (through participation of interested and available stakeholders), rather than scientific findings or lack thereof.

These two barriers are not exclusive of this policy, they play a main role in environmental strategies in other contexts, including companies, cities, and nations (Lorek and Fuchs, 2013; Lorek and Fuchs, 2019; O'Rourke and Lollo, 2015). As a result, in the coming period we may see a growing production volume of more durable clothing, unnecessary accumulation of textiles in homes, demanding space and therefore also growing environmental impact, and growing quantities of unwanted products shipped from the Global South to the Global North, and back to the Global South again.

We recommend consumer goods environmental policy to tackle the growing production and consumption volume in the most direct way possible. Scholars from different fields have proposed several ways of doing this (Bocken et al., 2022; Cosme et al., 2017; Fletcher and Tham, 2019; Vladimirova et al., 2024) and a few clothing-related policy initiatives addressing this issue have recently emerged. The most recent Dutch policy, for instance, includes production and import quotas (Ministrerie van Infrastructuur en Waterstaat, 2024). The French government, in turn, is developing alternatives to the EU policy, like the ECOBALYSE and French version of PEF. The ECOBALYSE includes an operationalized definition of Fast and Ultra-Fast Fashion so that such practices can be identified and therefore discouraged. It uses company size, product price, number of units produced, and length of the products presence on the market to account for product durability (Ecobalyse, 2024). This is just one way in which marketing issues can be addressed in policy aiming at reducing clothing production volumes.

The conclusions of this study naturally come with the limitations associated to the background of the authors, the methods employed, and the restricted access to relevant information. The expertise of the authors lies in sustainable production and consumption applied to textiles. Our previous knowledge of EU policy processes and policy analysis methods were limited, but we have conducted this study with much curiosity and dedication over a long period of time and have asked for input from scholars from different backgrounds to strengthen the research. Given that the data that would be necessary to conduct a more detailed analysis of the whole policy making process is not available, and that we had limited access to interviewees, our description of the process may be partial or highly influenced by the perception of a limited number of informants. Lastly, the research question focused on what was included in the final policy document, but also on what was excluded. Therefore, we had to be creative in findings ways to understand what was not visible. This approach can open doors for more critical research on policy, but also brings additional limitations to the methods and findings in the interpretation of what is missing. Limitations considered, this case study has shown how the logic of economic growth is impeding a focus on sufficiency in consumer goods environmental policy, hindering the development of more effective measures to reduce the impact of production and consumption. We authors recognize that the field of sustainable marketing may be experiencing similar obstacles to advance a research agenda that confronts growing production and consumption levels. Knowledge on how marketing-oriented regulation can contribute to reductions in demand for different consumer goods, the quantity of

products made, and thereby also discarded, is much needed. The existing research on anti-tobacco policies can be a reference for this line of inquiry. With more daring environmental policy ideas emerging, research on the possible actions and expected effects of marketing oriented environmental policy aimed at reducing consumption levels is now more relevant than ever.

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**Conflict of Interest**

No potential conflict of interest was reported by the author(s).

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**References**

Aus, R., Moora, H., Vihma, M., Unt, R., Kiisa, M., & Kapur, S. (2021). Designing for circular fashion: Integrating upcycling into conventional garment manufacturing processes. *Fashion and Textiles*, *8*. https://doi.org/10.1186/s40691-021-00262-9

Baczyk, M., Tunn, V., Worrell, E., & Corona, B. (2024). Consumer behavior in circular business models: Unveiling conservation and rebound effects. *Sustainable Production and Consumption*, *52*, 110984. https://doi.org/10.1016/j.spc.2024.10.022

Bocken, N., Niessen, L., & Short, S. (2022). The sufficiency-based circular economy — an analysis of 150 companies. *Frontiers in Sustainability*, *3*. https://doi.org/10.3389/frsus.2022.899289

Bour, A., Budde Christensen, T., Hunka, A. D., Palmqvist, A., Skjold, E., & Syberg, K. (2023). Implications of circular textile policies for the future regulation of hazardous substances in textiles in the european union. *Science of the Total Environment*, *896*, 165153. https://doi.org/10.1016/j.scitotenv.2023.165153

Cosme, I., Santos, R., & O'Neill, D. W. (2017). Assessing the degrowth discourse: A review and analysis of academic degrowth policy proposals. *Journal of Cleaner Production*, *149*, 321–334. https://doi.org/10.1016/j.jclepro.2017.02.016

Ecobalyse. (2024). Exemples: Page introduisant la notion d'exemples proposés au début du simulateur. https://fabrique-numerique.gitbook.io/ecobalyse/textile/exemples

ECOS. (2021). Durable, repairable and mainstream - how ecodesign can make our textiles circular. https://ecostandard.org/publications/report-durable-repairable-and-mainstream-how-ecodesign-can-make-our-textiles-circular/

Ernst, A., & Fuchs, D. (2022). Power dynamics, shifting roles, and learning: Exploring key actors in participation processes in the german energy transformation (energiewende). *Energy Research Social Science*, *85*. https://doi.org/10.1016/j.erss.2021.102420

European Commission. (2019). The European Green Deal. https://eur-lex.europa.eu/resource.html?uri=cellar:b828d165-1c22-11ea-8c1f-01aa75ed71a1.0002.02/DOC_1&format=PDF

European Commission. (2021). About This Initiative. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12822-EU-strategy-for-sustainable-textiles_en

European Commission. (2022a). About This Consultation. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12822-EU-strategy-for-sustainable-textiles/public-consultation_en

European Commission. (2022b). EU Strategy for Sustainable and Circular Textiles. https://environment.ec.europa.eu/publications/textiles-strategy_en

European Commission. (2020a). A New Circular Economy Action Plan. For a Cleaner and More Competitive Europe. https://eur-lex.europa.eu/resource.html?uri=cellar:9903b325-6388-11ea-b735-01aa75ed71a1.0017.02/DOC_1&format=PDF

European Commission. (2020b). A New Industrial Strategy for Europe. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0102

European Commission. (2020c). Europe's Moment: Repair and Prepare for the Next Generation. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0456

Fletcher, K., & Tham, M. (2019). Earth logic: Fashion action research plan. *Dress*, *49*(1), 95–97. https://doi.org/10.1080/03612112.2022.2152979

Fook, L. A., & McNeill, L. (2020). Click to buy: The impact of retail credit on over-consumption in the online environment. *Sustainability*, *12*. https://doi.org/10.3390/SU12187322

Gossen, M., Ziesemer, F., & Schrader, U. (2019). Why and how commercial marketing should promote sufficient consumption: A systematic literature review. *Journal of Macromarketing*, *39*, 252–269. https://doi.org/10.1177/0276146719866238

Heidenstrøm, N., Strandbakken, P., Haugrønning, V., & Laitala, K. (2021). Product lifetime in european and norwegian policies. https://oda.oslomet.no/oda-xmlui/bitstream/handle/11250/2774663/SIFO-report%2011-2021%20Lasting.pdf

Hwang, C., Lee, Y., Diddi, S., & Karpova, E. (2016). "don't buy this jacket": Consumer reaction toward anti-consumption apparel advertisement. *Journal of Fashion Marketing and Management*, *20*, 435–452. https://doi.org/10.1108/JFMM-12-2014-0087

Jaeger-Erben, M., Wieser, H., Marwede, M., & Hofmann, F. (2023). *Durable economies, arbeit und organisation*. transcript Verlag. https://doi.org/10.14361/9783839463963

Laitala, K., & Klepp, I. G. (2022). Review of clothing disposal reasons. https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/

Leipold, S., Feindt, P. H., Winkel, G., & Keller, R. (2019). Discourse analysis of environmental policy revisited: Traditions, trends, perspectives. *Journal of Environmental Policy Planning*, *21*(5), 7200. https://doi.org/10.1080/1523908X.2019.1660462

Lorek, S., & Fuchs, D. (2013). Strong sustainable consumption governance - precondition for a degrowth path? *Journal of Cleaner Production*, *38*, 36–43. https://doi.org/10.1016/j.jclepro.2011.08.008

Lorek, S., & Fuchs, D. (2019). Why only strong sustainable consumption governance will make a difference. In *A research agenda for sustainable consumption governance* (pp. 19–34). Elgar. https://doi.org/10.4337/9781788117814.00010

Maldini, I. (2019). From speed to volume: Reframing clothing production and consumption for an environmentally sound apparel sector. In N. F. Nissen & M. Jaeger-Erben (Eds.), *Proceedings of the 3rd plate conference* (pp. 519–524). TU Berlin. https://doi.org/10.14279/depositonce-9253

Maldini, I., Klepp, I. G., & Laitala, K. (Forthcoming). The environmental impact of product lifetime extension: A literature review and research agenda. *Sustainable Production and Consumption*.

Manshoven, S., Vercalsteren, A., Christis, M., De Jong, A., Schmidt, I., Grossi, F., & Mortensen, L. (2023). Consumption and the Environment in Europe's Circular Economy. https://www.eionet.europa.eu/etcs/etc-ce/products/etc-ce-report-2023-8-consumption-and-the-environment-in-europe2019s-circular-economy

McIlwraith, H. K., Lin, J., Erdle, L. M., Mallos, N., Diamond, M. L., & Rochman, C. M. (2019). Capturing microfibers – marketed technologies reduce microfiber emissions from washing machines. *Marine*

*Pollution Bulletin*, *139*, 40–45. https://doi.org/10.1016/j.marpolbul.2018.12.012

Ministrerie van Infrastructuur en Waterstaat. (2024). Beleidsprogramma circulair textiel 2025–2030. https://open.overheid.nl/documenten/dpc-697735d15cdf032cbd6e13340c7d6d9b7f93f875/pdf

Monseau, S., Sorsa, K., & Salokangas, H. (2024). Cleaner clothes: The eu textile strategy and sustainability in the textile supply chain. *Georgia Journal of International Comparative Law*, *52*(2), 409–61.

Napper, I. E., Barrett, A. C., & Thompson, R. C. (2020). The efficiency of devices intended to reduce microfibre release during clothes washing. *Science of the Total Environment*, *738*. https://doi.org/10.1016/j.scitotenv.2020.140412

Neuman, M., Bitton, A., & Glantz, S. (2002). Tobacco industry strategies for influencing european community tobacco advertising legislation. *Lancet*, *359*, 1323–1330. https://doi.org/10.1016/S0140-6736(02)08275-2

Niinimäki, K., Peters, G., Dahlbo, H., Perry, P., Rissanen, T., & Gwilt, A. (2020). The environmental price of fast fashion. *Nature Reviews Earth Environment*, *1*, 189–200. https://doi.org/10.1038/s43017-020-0039-9

O'Rourke, D., & Lollo, N. (2015). Transforming consumption: From decoupling, to behavior change, to system changes for sustainable consumption. *Annual Review of Environment and Resources*, *40*, 233–259. https://doi.org/10.1146/annurev-environ-102014-021224

Paton, E. (2018). H&M, a fashion giant, has a problem: $4.3 billion in unsold clothes. https://www.nytimes.com/2018/03/27/business/hm-clothes-stock-sales.html

PlanMiljø. (2022). Synopsis report on the consultation on the eu strategy for sustainable and circular textiles. https://environment.ec.europa.eu/document/download/28669201-aecd-46b5-a1f5-cf740e3378fe_en?filename=Synopsis%20report%20textiles%20strategy.pdf

Puglia, M., Parker, L., Clube, R. K. M., Demirel, P., & Aurisicchio, M. (2024). The circular policy canvas: Mapping the european union's policies for a sustainable fashion textiles industry. *Resources, Conservation and Recycling*, *204*. https://doi.org/10.1016/j.resconrec.2024.107459

Ray, S., & Nayak, L. (2023). Marketing sustainable fashion: Trends and future directions. *Sustainability*, *15*. https://doi.org/10.3390/su15076202

Reich, B. J., & Soule, C. A. A. (2016). Green demarketing in advertisements: Comparing "buy green" and "buy less" appeals in product and institutional advertising contexts. *Journal of Advertising*, *45*, 441–458. https://doi.org/10.1080/00913367.2016.1214649

Studlar, D. T., Christensen, K., & Sitasari, A. (2011). Tobacco control in the eu-15: The role of member states and the european union. *Journal of European Public Policy*, *18*, 728–745. https://doi.org/10.1080/13501763.2011.586801

Taylor, S. (1997). Critical policy analysis: Exploring contexts, texts and consequences. *Discourse*, *18*, 23–35. https://doi.org/10.1080/0159630970180102

Vladimirova, K., Samie, Y., Maldini, I., Iran, S., Laitala, K., Henninger, C. E., Alosaimi, S. I., Drennan, K., Lam, H., Teixeira, A.-L., Jestratijevic, I., & Weber, S. (2024). Urban transitions toward sufficiency-oriented circular post-consumer textile economies. *Nature Cities*, *1*(11), 769–779. https://doi.org/10.1038/s44284-024-00140-7

Wijnia, G. (2016). *Mapping obsolete inventory in the dutch apparel industry*.

World Trade Organization. (2023). World trade statistical review 2022. https://www.wto.org/english/res_e/statis_e/its2015_e/its2015_e.pdf

WRAP. (2012a). Valuing our clothes: The evidence base. technical report. https://www.wrap.ngo/resources/report/valuing-our-clothes-true-cost-how-we-design-use-and-dispose-clothing-uk-2012

WRAP. (2012b). Valuing our clothes. the true cost of how we design, use and dispose of clothing in the UK. https://www.truevaluemetrics.org/DBpdfs/Issues/SupplyChain/Textiles/WRAP-REPORT-10.7.12%20VOC-%20FINAL.pdf

WRAP. (2017). Valuing our clothes: The cost of UK fashion. http://www.wrap.org.uk/sites/files/

wrap/valuing-our-clothes-the-cost-of-uk-fashion_WRAP.pdf