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NOTE

From: General Secretariat of the Council
To: Delegations

Subject: AOB for the meeting of the Council (Environment) on 25 June 2026
Tackling Ultra-Fast Fashion: Call for a coordinated EU approach
- Information from Germany, France and the Netherlands

The textile sector is characterized by high energy and water demand, resource and chemical use and a significant environmental footprint contributing to i.e. climate change, particulate matter emissions and acidification, alongside severe social costs. In the EU, the consumption of textiles, most of which are imported, accounts on average for the fourth highest negative impact on the environment and on climate change and third highest for water and land use. In the EU Strategy for Sustainable and Circular Textiles of March 2022 and in the targeted revision of the Waste Framework Directive (WFD) in September 2025, the European Commission has acknowledged that industrial and commercial practices, such as ultra-fast and fast fashion, shorten product lifespans and increase the likelihood of premature disposal, driving overconsumption and excessive textile waste generation.

The undersigned Member States welcome the efforts of the European Commission to follow-up on the implementation of several legislative proposals on textiles, such as the Ecodesign for Sustainable Products Regulation (ESPR) and the recent revision of the WFD, with mandatory Extended Producer Responsibility (EPR) for textiles. With this letter, we wish to **call on the Commission** to seize opportunities to further strengthen Europe's circular ambitions and to promote a shift to circular business models as attractive economic alternatives in light of the rapid growth of ultra-fast fashion, without creating disproportionate new bureaucracy.

Fast fashion has been identified as an important contributor enticing consumers to keep buying clothes of lower prices and with short physical durability, produced rapidly and in response to the latest trends. The rapid rise of ultra-fast fashion has further accelerated these trends with even more pronounced consequences for environment, (European) economy and society. Ultra-fast fashion commercial practices rely on new online sales and marketing techniques that drive demand and make fast production possible for a very low price. It is an accelerated form of fast fashion, characterized by near real-time design, production and online distribution, with continuous high-frequency release of large volumes of low-cost garments. These models typically prioritize speed and price over durability and quality thus directly disincentivizing sustainable practices. Ultra-fast fashion often maintains more flexible supplier relations, rendering environmental and social safeguard management between brands and suppliers in production countries even more challenging.

In recent years, online platforms have expanded their operations rapidly and have become significant disruptors in the European textiles market. This creates an uneven playing field for European businesses investing in sustainable and circular strategies, as current enforcement and legislative tools remain insufficient to ensure compliance by third country producers that are selling directly to EU consumers through online platforms. Meanwhile, European producers and their compliance can be effectively monitored. This difference in business models and enforcement possibilities is having a detrimental effect on the competitiveness of EU producers.

Ultra-fast fashion practices and their products lack incentive for safe and good care of the products, repair, reuse and/or recycling. The growing consumption of ultra-fast fashion is one of the main contributors that overload social enterprises and textile waste management systems in Europe and eventually end up being burned or landfilled, both within Europe and in the Global South. These practices impose significant costs on the national waste management systems of Member States as well as on the end-of-life infrastructure of third countries - predominantly in the Global South - where the EU exports part of its secondhand clothing.

Additionally, ultra-fast fashion raises significant health concerns such as human exposure to hazardous chemical substances and the release of pollutants and microplastics into water and air systems. Ultra-fast fashion also has a notable impact on the mental well-being of (young) people, as its constant pressure to keep up with rapidly changing trends can reinforce feelings of inadequacy, emotional dependency on buying and overconsumption.

The level of disruption we are currently witnessing significantly risks undermining Europe's efforts in the effective implementation of EU legislation, including the EU Textile Strategy, the ESPR delegated act on textiles and the WFD. Against this background, the undersigned Member States **call on the Commission** to urgently take additional EU-level action without creating disproportionate new bureaucracy.

Call for strong and enforceable product regulation

The EU strategy for Sustainable and Circular Textiles announced ESPR, together with new rules on EPR under the WFD, as the steppingstones to a new paradigm of attractive alternatives to fast changing fashion trends. The revised WFD allows Member States to develop tools to address ultra-fast fashion practices and their environmental impacts, notably through the introduction of EPR fee modulation linked to ultra-fast fashion practices.

The ESPR intends to maximize product lifespan and value of products and materials by ensuring that worst performing products can no longer be placed on the EU market. However, the preparatory study for the delegated act on textiles currently proposes only one single mandatory performance requirement for recycled content while leaving products of low durability, repairability, recyclability unaddressed. By not tackling worst performing products, the effectiveness of the ESPR in supporting the transition towards a more sustainable and circular textiles industry will be limited. In order for ESPR to live up to its potential, we **ask the Commission** to consider the following:

- **Propose additional performance requirements** addressing durability, repairability and/or recyclability, ensuring that low-quality products associated with ultra-fast fashion, are effectively regulated, depending among other resources on the outcomes of the impact assessment.
- **Support the transition to a closed-loop system for** textiles placed on the EU market through an effective and enforceable recycled content requirement to support the European recycling industry.
- **Adopt additional measures, through any appropriate regulatory action, to better inform consumers at the time of purchase.** For instance, brands meeting the criteria of ultra-fast fashion should be required to display informational messages on their selling pages, such as guidance on reuse and repair which should be required under ESPR and the Digital Product Passport (DPP), to encourage consumers not to discard their product prematurely.
- **Define product reference** to harmonize this terminology as mentioned in recital 40 of the WFD across the EU and allow for collecting data on ultra-fast fashion via the DPP for textiles.

These measures should not impose disproportionate burdens on companies. The administrative burden should only apply to companies responsible for UFF practices, not to all companies and especially not to SMEs. Measures should also take into account international obligations of the EU and their implementation in practice by third countries and must be easily verifiable and controllable by competent authorities. Overall, the Commission should assess possible economic and social consequences.

Tackle specific ultra-fast fashion characteristics under legislative frameworks

To effectively tackle ultra-fast fashion, regulation must capture the dynamics of the business model itself. With the upcoming ESPR delegated act for textiles and the implementing act of the WFD on eco-modulation, there is a concrete opportunity to regulate ultra-fast fashion more directly. Especially since several Member States are already working at the national level to develop targeted measures that effectively address the environmental impact of ultra-fast fashion commercial practices and their implications for textile waste management.

The undersigned Member States therefore **call on the Commission** to:

- **Take into account the expertise developed by Member States to develop an EU wide definition or criteria for ultra-fast fashion.** In this regard, we ask the Commission to work on the inclusion of extrinsic durability, where appropriate. Key considerations to separate ultra-fast fashion business models from others include the elements set out in recital 40 and article 22 quarter (6) of the revised WFD. This has already been tested and will be deployed in France.
- **Better account for additional impacts exacerbated by ultra-fast fashion,** such as the release of plastic microfibres, the likelihood that a garment will be burned or landfilled at the end of its life, air transport, etc.

Strengthening EPR schemes

Sorting, reuse and recycling businesses across Europe are struggling to stay afloat. Current EPR fees collected in existing schemes are insufficient to cover the costs of collecting, sorting and recycling of textile waste. In Member States without an already existing EPR for textiles, collection and recycling structures are often underfunded and at risk, as markets for second-hand textiles collapse under high volumes of low-quality products. This leaves municipalities, social enterprises and citizens to pay for the remainder of the costs. It is essential that EPR schemes in place are adjusted and new EPR schemes are introduced quickly, and that those are harmonized as much as possible. Strengthening the legislative framework would help address these challenges at their root.

To support a level playing field in the EU and strengthen circularity in the textile sector, the undersigned Member States **encourage the Commission** to:

Define harmonized criteria enabling Member States to implement ambitious modulations of EPR fees on ultra-fast fashion practices, covering the costs inherent to ultra-fast fashion for national waste management systems. These criteria may be determined by reference to the work carried out by Member States and based on the criteria set out in recital 40 of the targeted revision of the WFD.

In the meantime, the Commission should support national and international initiatives in this field with regards to addressing the global challenges.

Strengthening the enforcement of online platforms

ESPR and EPR are important instruments, but on their own they will not address ultra-fast fashion practices sufficiently. There is also a need for better and stronger enforcement and accountability for online platforms. Member States therefore **encourage the Commission** to:

Strengthen oversight and control of online platforms, reinforce market surveillance and close enforcement gaps under the Circular Economy Act and the Market Surveillance Regulation (2019/1020). Legislation should ensure that products placed on the market through these channels comply with EPR, ESPR and other relevant textile policies, and that advertising practices are regulated. In line with the latest guidance provided by the European Commission under the Circular Economy Act, relevant online platform providers should check automatically if vendors active on their platforms formally comply with EPR obligations and ecodesign and energy labeling requirements. This could support creating a level playing field by adapting enforcement and control mechanisms to the realities of e-commerce and mass small-parcel imports. The powers and tools of market surveillance authorities should be strengthened and EU-level governance for product market surveillance should be reinforced, particularly in the context of e-commerce and distance selling. This means stronger enforcement powers, enhanced coordination, improved testing capacities, and more effective cooperation between national authorities. Additionally, article 4 of the Market Surveillance Regulation does not function properly in the context of direct online sales.

It should be revised by strengthening the obligation to appoint a responsible person without overburdening SME and the use of the Digital Product Passport to automate market surveillance checks at the borders of the Union, increase the efficiency of market surveillance processes and close enforcement gaps.

Outlook

Addressing ultra-fast fashion requires a comprehensive package of mutually reinforcing measures. Tackling ultra-fast fashion requires an array of measures beyond the legislative efforts mentioned. It is crucial that measures do not impose disproportionate burdens on SMEs and that their limited capacities compared to large companies are taken into account. Member States **call on the Commission** to conduct further research into additional measures to tackle ultra-fast fashion. The undersigned Member States stand ready to contribute national expertise and work closely with the Commission to develop effective, future-proof solutions.