

ECAP

Embedding Circular Procurement in purchasing of workwear



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Executive summary

This EU LIFE2014 European Clothing Action Plan (ECAP) report follows up the initial *European Textiles & Workwear Market: The role of Public Procurement in making textiles circular* report. The market report published in June 2017 identified the potential benefits of more circular procurement of workwear and textiles in EU Member States. ECAP aims to use the drivers for wider EU green public procurement to generate demand pull for sustainable and circular public procurement in clothing.

This report seeks to summarise opportunities and barriers to cascading emerging knowledge and implementation of circular procurement principles across the European Community. It analyses the role of EU procurement National Action Plans and GPP criteria in supporting the ECAP aim. It also examines the potential for other instruments, such as policy, economic, procurement and capacity building, to be used to deliver the benefits associated with the procurement and supply of more circular workwear products.

Key recommendations based on the findings of this study include:

1. Engaging with suppliers and markets at the pre-procurement stage helps to encourage the supply and take-up of more circular workwear products. It also enables circular procurement of textiles to be seen as part of a broader approach to delivering a more circular economy and realising benefits including environmental impact reduction, green jobs and growth.
2. Broadening the adoption of strategic procurement for textiles and workwear, e.g. through voluntary sectoral initiatives, enables procurement to be considered as a more strategic instrument. Sectoral approaches enable a better understanding of current and future market potential for circular workwear products. This encourages new, more circular products through public sector demand and expenditure.
3. New voluntary Green Public Procurement (GPP) criteria have been published for textiles in 2017. These do not yet embrace the full range of opportunities for procuring circular textiles. Establishing a closer relationship with the GPP Advisory Group to identify the future potential for more circular workwear would enable the next generation of GPP textile criteria to deliver more circular outcomes.
4. GPP and national criteria should be supported by the development of relevant guidance that enables procurers to understand GPP criteria in the context of the relevant procurement procedures and the potential business models available. This would enable them to use existing and future criteria proactively to create more circular outcomes.
5. A key element in delivering more circular outcomes within textiles and other product categories is improving the ability of procurers to deliver more circular outcomes through better procurement performance. Targeting capacity building is a common recommendation and focussing on textiles and workwear can be seen as a relatively low risk, quick win approach to encouraging more circular procurement.
6. Collaborating with peers to share knowledge and coordinate procurement pipelines for workwear would help accelerate the take-up of circular procurement principles within EU Member States. This would help scale-up the impact reduction and the benefits associated with closing workwear materials loops.

Glossary

AA – Audit Authority. The audit authority is a national, regional or local public authority or body designated for each operational programme and responsible for verifying the effective functioning of the management and control system.

CA - Contract award

CAN - Contract award notice

Central Purchasing Body - a contracting authority which provides centralised purchasing activities and which may also provide ancillary purchasing activities.

CO₂ - Carbon dioxide

Contracting Authority – (alternative: purchasing authority) a body governed by public law which is predominantly financed by the state, or regional or local authorities.

CSR - Corporate Social Responsibility

EC - European Commission

EU - European Union

GDP - Gross Domestic Product

GPP - Green Public Procurement

LCC – Life Cycle Cost. The sum of all recurring and one-time (non-recurring) costs over the full life span or a specified period of a good, service, structure, or system. It includes purchase price, installation cost, operating costs, maintenance and upgrade costs, and remaining (residual or salvage) value at the end of ownership or its useful life.

MEAT - Most Economically Advantageous Tender

MS - Member States. Relating to the 28 member states of the European Union.

NAP - National Action Plan. In 2003, the European Commission encouraged Member States to draw up publicly available National Action Plans (NAPs) for greening their public procurement.

NL – The Netherlands

PCP - Pre-commercial procurement. Designed to steer the development of solutions towards concrete public sector needs, e.g. the procurement of research and development.

PPI - Public procurement of innovation. PPI is exclusively carried out on a voluntary basis. PPI is more complex and less suitable to standardisation as SRPP and GPP, where ready-made criteria can simply be “copy and pasted” in tender documents.

R&D - Research and development

Servitization (also called servicisation) - The provision of goods and products through service based solutions

SCAP – Sustainable Clothing Action Plan; A UK sectoral commitment for clothing

SME - Small and medium-sized enterprise

SPP - Sustainable public procurement

SRPP - Socially responsible public procurement

TCO - Total-Cost-of-Ownership. The purchase price of an asset plus the costs of operation. Used as a financial estimate to help buyers and owners determine the direct and indirect costs of a product or system. It can be used in full cost accounting and in ecological economics where it includes social costs.

UK – United Kingdom of Great Britain (England, Scotland and Wales) and Northern Ireland.

VAT – Value Added Tax

1.0 Introduction

1.1 Background to the report

This EU LIFE2014 European Clothing Action Plan project report follows the initial *European Textiles & Workwear Market: The role of Public Procurement in making textiles circular* report published in June 2017 and available on the ECAP website at www.ecap.eu.com.

1.1.1 European Clothing Action Plan (ECAP)

The overall objective of the EU LIFE2014 project is to create a European Clothing Action Plan (ECAP)¹ to drive a European-wide circular economy approach for the clothing sector that delivers against European policy directives on waste and sustainable consumption and production; and EU ambitions for low carbon and more circular approaches to economic growth.

Specifically, the Action Plan will provide a framework that will measurably:

- Reduce the carbon, water and waste impacts of EU clothing.
- Prevent waste in the clothing supply chain and the use of domestic clothing and workwear by business, consumers and governments.
- Ensure that less low grade clothing goes to incineration or landfill.
- Encourage innovation in resource-efficient design and service models to encourage business growth in the clothing sector and its supply chain.

Between 2015 and 2019 the project aims to adopt proven systematic practices for partner countries to reduce the environmental impacts of clothing production and consumption and in developing more circular approaches to business thinking and economic growth.

The learnings will be brought together in a single European wide action plan that identifies and systematically addresses the key challenges to reducing the environmental impact of clothing consumption across the domestic, private and public sectors. The plan will provide a framework for a generic approach supported by guidance for participants to identify and adopt the behaviour changes required to deliver on clearly identified environmental, social and business benefits. This framework will then be rolled out across EU member states over the course of the three year project to demonstrate take-up and action.

1.1.2 ECAP work package B5 – public procurement action

The aim of Action B5 in the EU LIFE 2014 ECAP project is to use the drivers for wider EU green public procurement to generate demand pull to support the companies that operate as suppliers of corporate workwear and uniforms (B2B), to inform existing criteria and where necessary, suggest new criteria for sustainable and circular public procurement in clothing. For example, sustainable public sector procurement criteria will encourage demand for fibre to fibre clothing. In turn it will help develop stable markets and de-risk investment in the new product lines. This ultimately results in more sustainable and circular public procurement.

¹ Further information: ECAP website www.ecap.eu.com

1.1.3 ECAP textiles Market Report - Part 1

The initial Market Report (Part 1) was published in March 2017². This sought to examine existing EU markets for workwear and the potential to close workwear product and material loops through more circular and sustainable procurement practices.

The report estimated that in 2015 across Europe there was over €8.6 billion of public sector textile and workwear procurement, equivalent to around 93,000 tonnes of workwear consumption. It also noted that the heterogeneous nature of both the demand side and the supply chain for workwear posed a challenge to increasing the circularity of products and workwear services. Addressing this challenge requires a strategic approach to circular workwear procurement, implemented at all levels, that ensures risk and responsibilities are equally shared. Furthermore, communicating circular ambitions to the market early will help enable innovation in design, manufacture and supply, and encourage the development and adoption of more Resource Efficient Business Models (REBMs).

The report noted the potential for circular workwear is high for both synthetic and natural fibres. However, to achieve the full potential a balanced approach that engages and incentivises a wide group of stakeholders will be necessary. The approach to closing the material loop will vary depending on the influence of the contracting authority in specifying the design, the business model for use (e.g. servicisation and take-back), and the disposal at end-of-life. Where the purchasing influence is weak, the report suggested the focus should be on increasing recycled content in new products, ensuring longer lifetimes and better collection for re-use and /or recycling.

1.2 Aim of the report

This report (Part 2) seeks to summarise opportunities and barriers to cascading emerging knowledge and implementation of circular procurement principles across the European Community. This will help address the aim of ECAP Action B5 to use the drivers for wider EU green public procurement to generate demand pull to inform existing procurement criteria, and where necessary suggest new criteria, for sustainable and circular public procurement in clothing.

It provides insights on what procurement mechanisms might potentially be used to stimulate circular procurement practices within the demand/supply chain of workwear. It also examines the role that existing Green Public Procurement (GPP) criteria can play in encouraging the demand-pull for circular workwear products and materials. In adopting this focus, it also identifies the gaps in existing criteria along with recommendations on how these may be addressed.

The report recognises that EU member states are progressing at different rates and starting from different levels with regards to current performance in both developing more circular economies (EU Action Plan³) and in adopting more sustainable public procurement (SPP) practices⁴. It builds on the distinctions made in Part 1 between 3 levels of EU MS procurement and resource efficiency practice (termed Band 1, Band 2 and Band 3 countries).

² <http://www.ecap.eu.com/wp-content/uploads/2016/09/ECAP-Workwear-Report-Pt-1-def-final.pdf>

³ *Closing the loop - An EU action plan for the Circular Economy. COM(2015) 614 final, 2015*

⁴ *Public procurement for a better environment. COM (2008) 0400 final, 2008*

Circular procurement of workwear does not happen in isolation from other procurement. So the report looks both at strategic and operational approaches alongside the role that existing mechanisms like the GPP National Action Plans (NAPs) can play in accelerating or inhibiting more circular procurement practices across Europe.

2.0 Current situation

Environmental sustainability is typically promoted through the use of GPP practices within the European Union (EU) member states. These focus on the voluntary inclusion of environmental criteria in tender documents either as technical specifications of the contract, in the selection criteria of the bidder, or incorporating them into the award criteria. The criteria are divided into core and comprehensive enabling different levels of performance to be specified depending on market availability and procurement need. The textiles criteria have recently been updated in June 2017⁵. The EU also encourages member states to develop national action plans (NAPs) designed to raise awareness among contracting authorities and potential bidders on the advantages of GPP and insight into how it might be implemented. In 2003, the European Commission (EC) in its Communication on Integrated Product Policy⁶ encouraged Member States to draw up publicly available National Action Plans (NAPs) for greening their public procurement. Currently 23 of the 28 member states have set NAPs⁷. Estonia, Greece, Hungary, Luxembourg, Romania have yet to formally submit one to the Commission. In Romania a NAP has been prepared but not yet adopted.

In order to enable EU member states to encourage more circular procurement of workwear – or any other product category – consideration needs to be given to their current performance in terms of implementing GPP. This study draws on, and analyses, raw data collated for a recent report on GPP and circular economy for the European Parliament⁸. The data provides some insights where textiles and workwear are explicitly identified as priorities within individual countries.

2.1 Level of implementation of the national GPP-NAPs in member states

The recent report on CE and GPP on behalf of the European Parliament analysed the indicators used within NAPs (training and information, cooperation, installation of product group databases, tender models and monitoring) as a basis for assessing implementation⁸. The findings show that Austria, Belgium, Denmark, France, Italy, Netherlands, Portugal, Spain, Sweden and UK achieved the best results. As an example, the Netherlands National Action plan on SPP was issued in 2015 and is being implemented between 2016-2010. A key action is with local authorities for implementation of the ambitions in the action plan, which includes topics like Life Cycle Costing (LCC) and focus on award criteria and delivering on specific policy themes, like social, climate, energy, circular economy and innovation. An update on progress in all EC member states was published in October 2016⁹.

⁵ http://ec.europa.eu/environment/gpp/eu_gpp_criteria_en.htm

⁶ Communication from the Commission to the Council and the European Parliament - Integrated Product Policy - Building on Environmental Life-Cycle Thinking. COM(2003)0302 final, 2003

⁷ http://ec.europa.eu/environment/gpp/action_plan_en.htm

⁸ Green Public Procurement and the EU Action Plan for the Circular Economy. European Parliament Think Tank 2017 [http://www.europarl.europa.eu/thinktank/en/document.html?reference=IPOL_STU\(2017\)602065](http://www.europarl.europa.eu/thinktank/en/document.html?reference=IPOL_STU(2017)602065)

⁹ http://ec.europa.eu/environment/gpp/pdf/Oslo%202016/update_member_states.pdf

Not all NAPs explicitly prioritise particular product categories. Table 2.1 shows those member states that directly, or indirectly, reference textiles and workwear criteria as a sectoral priority for the NAP. The prioritisation typically referenced or recommended use of existing GPP criteria on textiles, or specifically mentioned that national criteria for textiles were in place. For example, most NAPs made general recommendations to use EU GPP criteria (including textiles by extension). Some countries, like Cyprus, specifically mention using EU GPP for textiles. This suggests a potentially stronger focus on textiles as a category. Ireland currently recommends use of GPP criteria for textiles and uniforms but is developing its own national criteria. It is not possible to say whether national criteria developed by many countries is more advanced than the existing GPP criteria. However, it may be assumed that these will enable more context specific outcomes to be delivered and so potentially more likely to support the implementation of national circular economy and procurement strategies, if they exist.

Most NAPs have been published before the development of circular economy (CE) package in 2014 and 2015. Not surprisingly, there is little reference to the circular economy in existing NAPs. However, a number of the NAPs contain references to indicators of circularity such as reuse & repair (e.g. Bulgaria, Italy), recycling (e.g. France), waste prevention (e.g. Finland, France) and product ecodesign (e.g. Slovakia, Spain). These elements can facilitate the closing of product and materials loops.

Table 2.1 Summary of focus on textiles in National Action Plans.

Country	Textiles criteria development
Austria	national criteria developed
Cyprus	recommend GPP criteria for textiles
Finland	textiles (workwear) national criteria developed
France	national criteria developed
Germany	national criteria under development
Ireland	textiles and uniforms (national under development) GPP recommended
Italy	national criteria developed
Malta	national criteria developed
Netherlands	national criteria developed
Portugal	EU GPP criteria recommended
Slovakia	EU GPP criteria recommended
Sweden	national criteria developed
UK	national criteria developed

2.2 Implementation of GPP criteria

A survey in 2012 by the Centre for European Policy Studies¹⁰ found textiles to be the least well implemented criteria set from the 9 product groups represented by GPP criteria. During the consultation during the GPP textiles criteria revision it was noted that “there was a need to focus on specific products was highlighted e.g. work wear, emergency services, healthcare” and it was questioned whether the wide range of textile applications and clothing types (uniforms, workwear, PPE etc) could be adequately assessed with one set of criteria¹¹. This may possibly explain some of the poor take-up of the original criteria. The

¹⁰ *The uptake of green public procurement in the EU27. EC DG Environment, 2012*

¹¹ *Revision of the EU Green Public Procurement (GPP) Criteria for Textile Products and Services: Technical report with final criteria. EU JRC Science & Policy Report, 2017*

criteria for textiles have been updated in 2017, but as yet, there is no additional evidence to show that this position has changed.

2.3 EU member states and circular economy

Table 2.3 summarises member states within 3 broad bands based on a ranking of implementation against National Action Plans, GPP and Circular Economy actions. Annex 2 provides further detail. The intention of the banding is to identify which strategies may be most appropriate for increasing the circularity of textiles and workwear procurement.

Many countries are yet to start consistently implementing GPP and circular economy (CE) actions or use procurement as a strategic tool for encouraging circularity (e.g. Band 3, Table 2.3). Some countries (e.g. Band 2, Table 2.3) are implementing GPP to some degree but not linking with CE; and some countries that are beginning now to implement GPP and CE simultaneously (e.g. Band 1 countries, Table 2.3).

Table 2.3: Summary of EU Member States, GPP and Circular Economy

	Band 1	Band 2	Band 3
Definition	<i>Evidence of active CE and sustainable procurement implementation; some evidence of circular procurement pilots</i>	<i>Partial implementation of NAPs, some sustainable procurement implementation and CE package actions</i>	<i>Insufficient availability and/or implementation of NAP, GPP and sustainable procurement. Low implementation of CE package measures</i>
Countries	Austria, Belgium, Denmark, Finland, France, Ireland, Italy, Netherlands, Portugal, Sweden, United Kingdom	Bulgaria, Germany, Latvia, Malta, Spain	Croatia, Cyprus, Czech Republic, Estonia, Greece, Hungary, Lithuania, Luxembourg, Poland, Romania, Slovakia Slovenia (2004)
Development options	Strategic procurement; category management voluntary sectoral commitments (e.g. 'green deal' type); link to broader CE; certification & labelling developing additional circular textiles criteria	Strategic procurement, Category management, piloting circular textiles, GPP comprehensive criteria, Adoption of circular national criteria, guidance & capacity building in circular procurement	Consistency in use of GPP criteria for textiles, piloting textiles as category approach, capacity building in sustainable procurement and circular economy

3.0 GPP criteria

3.1 Existing EU GPP approach for textiles

The European Commission currently offers GPP criteria sets for 21 product groups, including textiles. The GPP criteria for textiles were established in 2012 and have recently been updated in 2017¹². For each of the product groups, there are two levels of criteria – core and comprehensive criteria. According to the European Commission¹³ these are defined as:

- Core criteria - suitable for use by any contracting authority across the Member States and address the key environmental impacts.
- Comprehensive criteria - for those who wish to purchase the best environmental products available on the market.

The EU GPP criteria are designed to be directly included in the tender documents. For each criterion, the set of EU GPP criteria specifies if it should be used as a selection criterion, technical specification, award criterion or a contract performance clause:

- **Selection Criteria:** These criteria relate to the potential supplier. For example, (a) the suitability to pursue the professional activity; (b) economic and financial standing; (c) technical and professional ability (Directive 2014/24/EU).
- **Technical Specifications:** The Technical Specifications lay down the characteristics required of a works, service or supply (Directive 2014/24/EU).
- **Award Criteria:** Contracting authorities shall base the award of public contracts on the most economically advantageous tender. The most economically advantageous tender may include the best price-quality ratio, which shall be assessed on the basis of criteria, including qualitative, environmental and/or social aspects, linked to the subject-matter of the public contract in question (Directive 2014/24/EU).
- **Contract Performance Clauses:** These clauses are used to specify how a contract must be carried out.

In principle the GPP criteria are developed with a combination of elements in mind, including market availability, economic efficiency, widely verifiable and ease of use. As such they represent an important operational tool and stepping stone in the development of consistent and repeatable steps towards more sustainable public procurement.

The criteria for textiles focus on the most significant environmental impacts along the life cycle of the products, which for textile products have been divided into five distinct categories:

- fibre sourcing;
- chemical restrictions – production process and product;
- durability and lifespan extension;
- energy conservation during use; and
- design for reuse and recycling.

A total of 29 criteria spanning selection, technical specifications, award and contract performance cover both core and comprehensive requirements for green textile products. The emphasis is however on reducing ecotoxicity and energy consumption in production¹⁴. Annex 1 provides a summary of the 13 GPP criteria that relate to product and material

¹² http://ec.europa.eu/environment/gpp/pdf/criteria/textiles_2017.pdf

¹³ http://ec.europa.eu/environment/gpp/gpp_criteria_en.htm

¹⁴ EU green public procurement criteria for textiles products and services. European Commission SWD(2017) 231 final. 2017

circularity. The table in Annex 1 uses the life cycle matrix developed in the 2017 European Parliament CE and procurement report⁸. It highlights that even within the new GPP criteria set for textiles there are significant gaps if procurement projects are seeking to use the criteria to implement circular procurement of textiles. The criteria are also voluntary, and users would benefit from guidance to achieve the most circular outcome for workwear and textiles.

3.2 Gaps (with relevance to circular procurement approach)

Using the matrix developed in the recent (2017) EP report on GPP and circular economy⁸ (Annex 2) the new textiles criteria have been mapped to highlight the gaps relating to circular procurement when the textile product life cycle stages are combined with the existing GPP criteria. In practice sourcing, use and disposal are covered to some degree but there is a clear level of inconsistency that reflects the current markets ability to deliver circular textiles solutions.

It is also worth noting that by addressing these gaps and closing textile material and product loops, additional environmental impacts relating to water and emissions to air, land and water will also be reduced.

4.0 Other relevant instruments

GPP criteria are an important tool, supported by GPP technical reports, including the Buying Green Handbook and a collection of good practice examples of GPP. However, they are not the only instruments that can help enable the development of circular procurement of textiles and workwear. A brief summary of other possible instruments to improve circularity of workwear are listed below. These are loosely grouped according the area of influence.

4.1 Other implementation instruments

4.1.1 Policy

The use of formal regulations or legislation to control behaviour and / or broad market failures is a 'top-down' approach that forms the basis of EU regulation. One evident gap between those countries currently implementing SPP and circular procurement is a strategic link between the policy or legislative requirement at a national level and the implementation at a different scale. For example, the development of sectoral roadmaps¹⁵, city roadmaps¹⁶ and action plans and at an organisational level, the development of circular and or sustainable procurement strategies for implementation.

The perception and reality of legal challenges to procurement is a common barrier cited by practitioners¹⁰. It has also been used as a rationale for persisting with least cost procurement approaches in some countries. Adopting circular procurement principles needs to take this barrier into account.

Creating a robust 'top-down' procurement framework enables both procurers and suppliers to understand the risks and benefits in moving from least cost, through Most Economically Advantageous Tendering (MEAT) to more circular procurement. This broader sectoral approach is applicable to more than textiles but focussing on textiles, e.g. through category

¹⁵ For example, *Category Plan Workwear Dutch national government. 2015*

<https://www.pianoo.nl/sites/default/files/documents/documents/categoryplanworkweardutchnationalgovernment-april2015.pdf>

¹⁶ For example, *London Circular Economy Route Map, 2017; Roadmap Circular Economy Rotterdam, 2016; Glasgow, 2016*

planning, might help pilot new approaches and mitigate risks (e.g. lack of knowledge and poor uptake of innovation) to some extent.

4.1.2 Economic

Taxation, e.g. progressive and regressive provide fiscal incentives and disincentives to change behaviour in suppliers and buyers. Economic incentives, such as lower Value Added Tax (VAT) rates are cited as ways to encourage certain behaviour. Subsidies, as in agriculture, could also be used to encourage infrastructure for closing textile loops. Economic penalties are however more common, for instance, taxation designed to reduce the sale, use and end of life options for certain products such as poorly recyclable products, e.g. aggregates levy (UK) and landfill taxes (Denmark, Netherlands, Belgium, UK, Italy, Sweden, Poland etc).

Extended Producer Responsibility (EPR) is globally recognised as an efficient waste management policy to help improve recycling and reduce landfilling of products and materials. It has potential to be extended as an instrument to encourage greater circularity through product stewardship. Further work is however, required to assess its role, cost benefits and potential impacts within the existing regulatory framework.

The biggest potential for influence is probably the need for many governments to reduce their expenditure in order to solve deficit challenges¹⁷. This provides an opportunity to re-align the provision of goods and services with revised needs. This in turn provides an opportunity for new and more circular business models (e.g. servicisation) to be employed in closing product and material loops within textiles.

4.1.3 Directive approach

Public expenditure, through the provision of public services and via sponsored non-governmental organisations, can be used to create demand-pull. The interdependency between internal market policy, e.g. encouraging circular procurement, and competition control however needs to ensure that market evolution does not lead to harmful structures for users and legitimate market participants. Purchasers need to recognise that in setting circular ambitions they give due consideration to existing suppliers to adapt or innovate with products. This is something category planning does as with the Dutch textiles category plan¹⁵.

4.1.4 Collaborative

Voluntary agreements including sectoral commitments, green deals, professional codes of practice and agreements between governments (demand-side) and business (supply side), remain popular 'arms-length' instruments for encouraging improvement in environmental performance. In the UK, WRAP (Waste & Resources Action Programme) has applied sectoral commitments across retail, construction and since 2012, within clothing (SCAP2020) to address various aspects of closing products and materials loops. The SCAP2020 Commitment enables leading organisations from across clothing sector – supply, re-use and recycling – working together to reduce the environmental footprint of clothing. It's focuss is on consumer clothing and it does not currently extend to workwear, although the principles are transferable.

The Green Deals approach in the Netherlands incorporates companies, local and regional government and other stakeholder organisations to work together on green growth and

¹⁷ *Towards a more efficient public sector. McKinsey on Government, 2011*

social issues. The aim has been to remove barriers in order to help sustainable initiatives get off the ground through pilots ('bottom up' approach) and to accelerate this process where possible. To date this covers 9 themes and 193 green deal pilots (59 in the resources theme which includes workwear pilots). This approach has been built on in Belgium where a newly launched Green Deal initiative already has 85 participating members¹⁸. The commitment is to participate in the learning network and share knowledge and experience. The green deal approach is also being actively considered in Sweden and Finland as a means of initiating collaboration within key procurement categories.

Although no extensive analysis has been undertaken on what works or doesn't work in terms of sectoral approaches, some common themes have emerged from sources such as the EU life Rebus project¹⁹. Six common principles are summarised below:

- Collate existing evidence – benchmarking current performance and creating the evidence base (e.g. business case) for change.
- Set clear ambitions – identifying goals and clear targets to work towards over a given timeframe (existing green deals and voluntary commitments are typically around 3 years).
- Collaborate, consult & build engagement – ensuring that all relevant stakeholders are actively involved and participating.
- Provide support – creating a framework e.g. a learning network that provides capacity building opportunities and timely access to resources during the procurement cycle.
- Act – e.g. through directly hosting pilots and /or actions that support the participants and learning network.
- Monitor and evaluate – enabling learning and feedback to ensure that successful pilots are repeatable and existing and new barriers can be addressed in new pilots.

4.1.5 Innovation

Public Procurement of Innovative solutions (PPI) can address challenges, e.g. circular workwear, through innovative solutions that are nearly, or already in small quantity, in the market. These don't require new Research & Development (R&D) with associated costs and risk. Pre-Commercial Procurement (PCP) can be used when there are no near-to-the-market solutions yet and new R&D is needed.

In practice, a combination of these innovation approaches is typically used within EU member states to differing degrees and with varying rates success. In looking to increase circular procurement of textiles within different EU member states the starting point should be identifying what instruments are commonly being used and building on these. Understanding the capacity for change within a sector, e.g. through strategic category planning, is an important step in considering whether incremental steps or transformational change in procurement are likely to be the most productive starting strategies. The prioritisation method developed in the UK helps identify the most likely approaches based on attitudes to risk, scope to influence and key environmental and social indicators²⁰.

4.1.6 Certification and labelling

Purchasing authorities can encourage and adopt practical, clear and meaningful standards, certification, labelling and traceability systems that address all aspects of textiles circularity.

¹⁸ Flanders Green Deal Shared Mobility www.gedeeldemobiliteit.be/english

¹⁹ EU LIFE REBus (Resource Efficient Business Models) www.rebus.eu.com

²⁰ <http://www.gov.scot/About/Performance/scotPerforms/partnerstories/SustainablePublicProcurementPrioritisationTool>

However, certification does not currently exist for circular products and that ecolabels in textiles tend to focus on sourcing and ecotoxicity. These instruments are not likely to benefit early movers in circular textiles but could help build market confidence as more circular textiles become available on the market in future years.

The role of certification and labelling and their potential in helping to close textile loops is potentially useful in reducing risk and improving verification as more circular textile products become available to the market. They could also help address barriers in EU member states where legal challenges to procurement decisions inhibit innovation. It could be potentially a useful mechanism as part of a broader strategy for closing materials loops so further work is required to examine its potential role and impact.

Certification involves compliance with EU regulatory requirements. For the majority of exported products, compliance is visibly testified by the use of CE marking. Use of standards is also part of the certification process. Under the EU Procurement Directives (2004/18/EC and Directive 2004/17/EC), ecolabels may be used in public procurement although procurers are not allowed to demand that a product carries an ecolabel, but may only indicate that the criteria underpinning a certain ecolabel must be met and that the ecolabel may be used as one form of proof of compliance. Procurers can also only use ecolabel criteria that refer to characteristics of the product or service itself or production processes.

4.1.7 Technical & operational

Procedures and complexity of processes came out as the highest barrier to improving procurement performance in the PWC 2016 survey²². As well as contracting authorities, auditing authorities can suffer from similar barriers. So even where there is a willingness within the contracting authority of a member state to adopt circular principles, there potentially needs to be a parallel level of understanding within the auditing authority where these have a direct influence on the implementation of operational procedures.

Pooled procurement

Pooled procurement provides opportunities for information sharing and reducing risks around individual buying. This is particularly relevant for smaller purchasing bodies, particularly for some categories where purchasing cycles in similar categories can enable smaller public bodies to influence product types through economies of scale, e.g. a number of hospitals combining together to purchase nursing uniforms. Increasing purchasing power can then potentially create greater opportunities to improve the circularity of workwear, e.g. through a combination of coordinated buying, group ordering and central contracting.

Market dialogue

Market engagement is a key part of all good procurement practice. In encouraging more circular textile products, it can also help move the market forward by providing transparency to suppliers of procurement pipelines. This enables suppliers to understand the potential value of future demand enabling them to reduce risks in innovating and offering new circular products. Market dialogue also highlights the importance of the 'pre-procurement' phase for both purchasers and suppliers in understanding the circular options – products and business models – available.

Central Purchasing Bodies

Central purchasing bodies (CPBs) are a form of pooled procurement. They can play an important role in either encouraging, or inhibiting, more circularity in product categories like textiles. For example, when CPB members would like to source more circular textile options they are often not part of the current category scope. Austria, France, Portugal, Spain and

Sweden stand out as countries where central purchasing bodies are committed to implementing strategic category-based public procurement. Other countries like the United Kingdom use CPBs to drive best value and many, like Belgium, have some contracting authorities that purchase direct whilst others use a CPB framework or cooperate with one or more other contracting authorities depending on the nature of the specific procurement.

Frameworks

Framework agreements are types of 'umbrella' agreement negotiated with suppliers either by, or on behalf of, the purchasing organisation. Many purchasing organisations buy through these agreements. Each framework agreement comes with standard terms and conditions. These can either be targeted to improve the circularity of products and services or, in the worst case, can inhibit improvement, e.g. where performance criteria do not include increasing circularity.

Functional specifications

Functional specifications can support circular outcomes and encourage suppliers to develop innovation and solutions as they define user needs and expected performance without reference to a specific solution. What the use will be, but not how this usability is going to be achieved or implemented. For example:

- Purpose: What is expected to be achieved, e.g. light.
- Inputs: Which inputs will be accepted, in what form and what are the acceptable sources of inputs etc.
- Processes: The steps to be followed, e.g. circular design principles.
- Outputs: Desirable characteristics of outputs, e.g. a fully circular piece of clothing.

e-Procurement

Although process-related, e-procurement and e-marketplaces can both encourage or inhibit the procurement of more circular goods. Typically, these offer users a convenient service that will give them access to a catalogue of goods and services. These are typically non-contentious so likely to include textiles and common workwear items. Where e-markets exist within member states the focus should be on ensuring that circular textile products are capable of being sourced alongside linear products and that purchasers (who can typically save favourites) are encouraged to consider more circular products, e.g. where costs are the same (or cheaper). Electronic or reverse auctions are also a potential mechanism for prolonging the life of workwear.

4.1.8 Capacity building

Capacity building includes education, training and providing services and resources to help change behaviour to professionalise and accelerate CP. NAPs make reference to training of staff and therefore provide a common framework with which to target embedding circular procurement practices in general. This would increase the incentive for practitioners to focus on priority categories like textiles where these are specifically referred to. In some countries this is being approached in a coordinated way, e.g. in the Netherlands through PIANOo, the centre of procurement expertise²¹. Collaboration is an important element in building capacity, knowledge and understanding internally and externally (see also section 4.1.4).

Lack of technical expertise is highlighted as a common barrier across procurement functions in EU member states. This raises the issue, found within the Dutch Green Deals, of utilising external assistance in the initial stages of capacity building. Budgets for training and external

²¹ <https://www.pianoo.nl/public-procurement-in-the-netherlands>

support, e.g. on circular procurement and/ or textiles, are not always available. A strategic approach to circular textiles needs to recognise therefore that some budget for initial capacity building needs to be factored in until sufficient internal capability has been built up.

Capacity building can also often entail organisational change, such as the establishment of a new unit (e.g. support centre) within a government department or the reform of processes and even financial systems (e.g. to enable whole life costing approaches or new business models to be considered).

Communication

In addition to internal capacity building, external communication with the market to influence businesses, media and government attitudes using information (rational behaviour) rhetoric and persuasion is also a feature of successful sectoral approaches. As previously mentioned, this can help reduce supply-side risks in offering more circular products and business models.

4.1.9 Guidance materials

Topic specific guidance is the third most popular tool behind procedure manuals and general guidance²². In the context of textiles, it is therefore a useful area to consider influencing when looking to embed circular procurement into workwear and textiles procurement. This is reinforced by the fact that choice of criteria and GPP are the 4th and 6th most common topics found in guidance.

It is also potentially worth purchasing bodies linking guidance for circular procurement of textiles to wider guidance. For example, workwear is driven strongly by health and safety requirements covering personal protective equipment (PPE), uniforms and corporatewear. Where relevant circular procurement opportunities can be used alongside these mandatory and technical guidance notes.

5.0 Key roles in circular procurement

The procurement cycle touches a wide range of internal roles within contracting authorities. Table 5.1 below summarises the main roles. Depending on the approach adopted to increasing the circularity of workwear within member states, a combination of these roles will need to be engaged and incentivised to encourage the take-up of more circular workwear and textile products.

²² *Stock-taking of administrative capacity, systems and practices across the EU to ensure the compliance and quality of public procurement involving European Structural and Investment (ESI) Funds. DG Regional & Urban Policy, European Commission 2016*

Table 5.1 Examples of Demand-side roles in public (circular) procurement

Function	Activities
Public Management	<ul style="list-style-type: none"> ▪ Sponsor and managerial responsibility for circular procurement in a public organisation ▪ Encourages budget holders / internal clients to choose for sustainable solutions ▪ Provides support to procurement officers with policy frameworks, knowledge and capacity ▪ Creates awareness for best practises
Budget holder or internal client	<ul style="list-style-type: none"> ▪ Owner of the circular procurement ▪ Challenges the procurement officer on sustainable procurement ▪ Informs public management on the risks associated with sustainable procurement ▪ Complies with sustainable procurement policies (or explains why these are not followed)
Facility manager	<ul style="list-style-type: none"> ▪ Emphasise the importance of sustainability and circularity among shared services
End-users	<ul style="list-style-type: none"> ▪ Ensure items and arrangements for use are functional ▪ Contributes to performance improvement over lifetime of contract
Procurement officer	<ul style="list-style-type: none"> ▪ Facilitates budget holder / internal client with their sustainable procurement needs ▪ Advises budget holders / internal clients how to create (more) sustainability impact ▪ Stimulates real action on sustainable procurement among budget holders / internal clients ▪ Provides management with monitoring information on sustainable procurement
Contract manager	<ul style="list-style-type: none"> ▪ Manages performance and improvement over lifetime of contract ▪ Ensures / stimulates the availability of more circular solutions for their internal clients
Policy advisors, experts	<ul style="list-style-type: none"> ▪ Ensure the policy advisor have up to date knowledge on circular procurement ▪ Provide a resources and guidance for budget holders or internal clients and procurement officers

Source: Adapted from Pianoo²³, The Netherlands

6.0 Summary and recommendations

6.1 Summary

The range of EU member states and their current levels on engagement and capacity for delivering sustainable public procurement varies considerably (cf Annex 2). It is clear that in seeking to encourage the market to close workwear material loops through public procurement, different approaches are required in different countries. These will depend in part on the size and proximity of the workwear market, the public sector influence on that market, the degree of engagement with GPP and with circular economy actions among other things.

A combination of top-down - policy as a central tool – and bottom-up – focussing on local champions, target groups and service deliverers is likely to deliver the most consistent approach to encouraging more circular European workwear markets. Frameworks like the

²³ Pianoo- Centre of procurement expertise, The Netherlands

<https://www.pianoo.nl/sites/default/files/documents/documents/manifest-mvi-actieplan-ministerie-infrastructuur-milieu.pdf>

Dutch (and Belgium) green deal initiatives provide a mix of both by setting a top down legislative and mandatory target for circular procurement, delivered through a voluntary approach. This 'mixed approach' may be more suitable for Band 1 countries (c.f. Table 2.3) that are 'circular economy aware' and seeking to take practical steps towards realising the benefits through public sector procurement. It may be more appropriate for some EU member states (e.g. Band 2 countries) to frame action through a mandatory approach whilst for other EU member states (Band 1 countries) focussing on bottom up capacity building for specific groups may be a more practical first step.

6.2 Recommendations

A common EU approach to the workwear market

1. There are a number of different approaches that can be considered when aiming build procurement capacity and improve performance for countries at different stages of SP development. These include the 'top-down' examples of integrated legislative, policy and implementation mechanisms through to 'bottom-up' examples of supporting more consistent baseline performance in priority categories such as textiles. Based on the analysis within this report, top down approaches are more likely to be applicable to the Band 2 countries whilst bottom-up approaches are likely to be more successful in the Band 3 countries. Band 1 EU countries are more likely to be able to cope with more complex mixed approaches, e.g. where circular textiles procurement is seen as part of a broader approach to delivering a more circular economy and achieving the resulting benefits such as green jobs and growth.

Textile sector and workwear products

2. Sectoral approaches in countries such as the UK, Netherlands and Belgium have demonstrated the potential to engage more closely with specific supply chains. They have also enabled a clearer understanding of the potential risks and benefits to be identified by both the customer and the supplier through market dialogue. Broadening the adoption of voluntary sectoral strategies for textiles and workwear enables procurement to be considered as a more strategic instrument. Performance improvement, monitoring and evaluation are key components in these approaches. It also enables targets and performance related timescales to be set along with requirements for reporting. Consideration of a sectoral approach, such as the Dutch or Belgian Green Deals, should be considered for all EU member states.
3. Sectoral approaches also enable a better understanding of current and future market potential for circular workwear products. This allows benchmarking and planning of development, encouragement and acceleration of new circular products through public sector demand and expenditure within existing markets as well as identifying the potential for new markets for existing circular products.

GPP criteria

4. Even when textiles criteria are referenced in NAPs, they may not be being used actively by purchasing bodies. In countries where strategic category procurement is less developed, focus on getting existing GPP criteria on textiles being used, and weighted, more consistently in progressive steps from core to comprehensive.
5. Focus could be given to developing, promoting and adopting new national criteria that enables a more complete approach to circular procurement. Particularly for

those countries that have highlighted textiles (Table 2.1). The focus should be on guiding the development of more circular outcomes for workwear.

6. New EU GPP textile criteria are now available but they are voluntary and do not yet embrace the full range of opportunities for procuring circular textiles. Establishing a closer relationship with the GPP Advisory Group to identify the future potential for more circular workwear would enable the next generation of GPP textile criteria to deliver more circular outcomes.
7. These GPP criteria actions should be supported, in parallel, by the development of relevant guidance that enables procurers to understand GPP criteria in the context of the optimal procurement procedure and the potential business models available. This would enable them to use existing and future criteria proactively to create more circular outcomes within existing the marketplace.

Capacity building

8. A key element in delivering more circular outcomes within textiles and other product categories is improving the ability of procurers to deliver more circular outcomes through better procurement performance. Therefore, targeting capacity building and focussing on developing a strategic approach is a common recommendation across all EU member states. Whilst this has general benefits in raising levels of awareness for more strategic sustainable procurement, a focus on textiles and workwear can be seen as a relatively low risk, safe approach to developing circular quick wins that can be replicated across other more complex categories.
 - a. For member states where least cost procurement is still commonly used this might entail using workwear as a pilot category for applying Most Economically Advantageous Tendering (MEAT) criteria to create more circular outcomes for workwear.
 - b. For those countries where MEAT is being more consistently applied the focus should be on encouraging a stronger sectoral focus for textiles, e.g. category planning.
9. The production and roll-out of associated easily accessible guidance is an important supporting element in capacity building. Effective communications and dissemination is also essential in ensuring guidance remains relevant and accessible at the relevant stages within the procurement cycle. A category planning approach would help provide a framework for linking all these aspects together in a coordinated way.
10. Collaborating with peers to share knowledge and potentially also coordinate procurement pipelines for workwear would help accelerate the take-up of circular procurement principles within European member States. This would, in turn, scale-up the impact reduction and the benefits associated with closing workwear materials loops.

Annex 1 Summary of GPP criteria for textiles relating to product & material circularity

TEXTILES 2017 GPP CRITERIA

SC=Selection Criteria; AC=Award Criteria; TS=Technical Specifications; CPC=Contract Performance Criteria

Comp.= Comprehensive criteria (otherwise core criteria)

GPP CRITERIA		Requirements for Service Contractors			Requirements for Products and Packaging						Requirements for Use stage					Requirements for Reuse and End of Life stage		
		Knowledge in LCA, recycled content, longevity, etc.	Capacity waste management	Report on waste management	Low weight	Reuse	Recycled content	Designed for longevity	Designed for recycling	Information on End of Life available	Durability/ Longevity	Repairability	Spareparts - availability	Spareparts - cost-effectiveness	Low-maintenance	Extended producer responsibility	Acceptance of returned goods	Waste Management
CE CATEGORIES																		
Production	Promoting Product Eco-design					TS4. Polyester recycled content (20%) AC2. Polyester and polyamide (nylon) recycled content	AC5. Design for reuse and recycling SC1 (Comp.)	AC3. Polyester recycling						TS10. Care labelling		SC1 (Comp.) Providers of textile services For take-back (end-of-life management) services		
	Promoting BAT waste management and RE in industrial sector																	
	Promoting Extended Producers Responsibility																	
Consumption	Increasing repair services	SC1. Providers of textile services TS2. Maintenance of the textile assets TS3. Take-back system										TS8. Availability of parts and accessories						
	Tackling planned obsolescence (durability/longevity)								TS7. Durability standards									
	Promoting waste prevention													TS9. Fabric selection to minimise energy use for drying and ironing				
	Promoting Sharing/ Collaborative economy/ Reuse/ Refurbishment																	
Waste Management	Contributing to long-term recycling targets																	
	Monitoring of waste quantities															CPC2. (Comp.) Take-back system		
	Improving/ Investing in waste management infrastructure		TS3. Take-back system (Comp.) - post-collection sorting activities in order to maximise the value obtained from reuse or recycling.															
From Waste to resources/ recycled material	Contributing to Improve Quality of Standards of secondary raw material																	
	Information flow on secondary materials																	

Annex 2 Summary of EU Member States, SP and Circular Economy

	Member State (date of entry)	Code	€Bn Spend	% GDP	NAP	NAP implementation	GPP Criteria use	%MEAT	%Price Only	Overall Rank
1	Austria (1995)	(AT)	35.18	11	yes	Good	Modified nationally	47	53	11
2	Belgium (1958)	(BE)	52	14	yes	Good	Modified nationally	64	36	12
3	Bulgaria (2007)	(BG)	4.81	12	yes	Partial	Modified nationally	38	62	9
4	Croatia (2013)	(HR)	5.3	12	yes	Partial	Used Directly	5	95	7
5	Cyprus (2004)	(CY)	1.08	7	yes	Low	No Information	8	92	4
6	Czech Republic (2004)	(CZ)	21.48	14	yes	Partial	Used Directly	18	82	6
7	Denmark (1973)	(DK)	33.8	14	yes	Good	Modified nationally	73	27	12
8	Estonia (2004)	(EE)	2.45	13	no	Low	No Information	19	81	7
9	Finland (1995)	(FI)	34.46	18	yes	Partial	Modified nationally	53	47	10
10	France (1958)	(FR)	306.98	15	yes	Good	National	96	4	12
11	Germany (1958)	(DE)	401.73	15	yes	Partial	Modified nationally	48	52	9
12	Greece (1981)	(EL)	16.23	9	no	Low	No Information	100	0	6
13	Hungary (2004)	(HU)	13.73	14	no	Low	No reference to GPP	35	65	5
14	Ireland (1973)	(IE)	15.54	9	yes	Partial	Modified nationally	84	16	10
15	Italy (1958)	(IT)	157.23	10	yes	Good	Modified nationally	55	45	11
16	Latvia (2004)	(LV)	2.66	11	yes	Partial	Modified nationally	11	89	8
17	Lithuania (2004)	(LT)	3.42	10	yes	Partial	Used Directly	11	89	7
18	Luxembourg (1958)	(LU)	5.47	12	no	Low	National	21	79	7
19	Malta (2004)	(MT)	0.7	10	yes	Partial	Modified nationally	3	97	8
20	Netherlands (1958)	(NL)	136.32	23	yes	Good	Modified nationally	90	10	12
21	Poland (2004)	(PL)	46.97	12	yes	Partial	No reference to GPP	17	83	5
22	Portugal (1986)	(PT)	17.29	10	yes	Good	Modified nationally	44	56	10
23	Romania (2007)	(RO)	15.98	11	no	Low	Modified nationally	10	90	7
24	Slovakia (2004)	(SK)	8.48	12	yes	Partial	Used Directly	12	88	7
25	Slovenia (2004)	(SI)	4.45	13	yes	Partial	Used Directly	22	78	7
26	Spain (1986)	(ES)	99.6	10	yes	Low	Modified nationally	76	24	9
27	Sweden (1995)	(SE)	68.68	16	yes	Good	National	45	55	11
28	United Kingdom (1973)	(UK)	274.6	14	yes	Good	National	93	7	12

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