

UNDERSTAND HOW EU LEGISLATION WILL IMPACT YOUR BUSINESS

EOS – 26 September 2023



OHANA PUBLIC AFFAIRS

- Boutique public affairs consultancy specialised in sustainability
- Committed to driving positive change through public affairs
- Expertise in textile industry
- Support various clients in defining an EU
 Public Affairs Strategy







TODAY TARGET

Translate EU legislation into business reality and actions





1st question:

Do you feel prepared for new sustainability rules and obligations coming from the European Union in the next years?

2nd question:

What type of organisations do we have in the room today?

- 1. Brands
- 2. Brands & retailers
- 3. Associations
- 4. Others





EU DECISION MAKING PROCESS



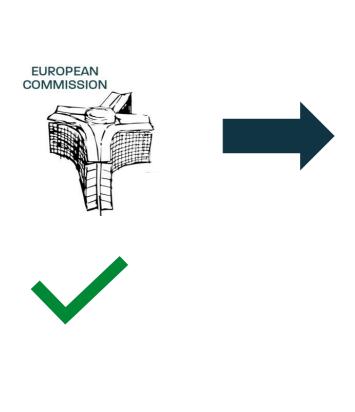


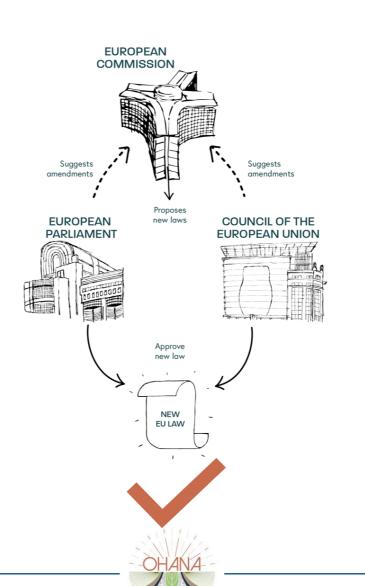
HOW IS LEGISLATION FINALISED IN BRUSSELS?

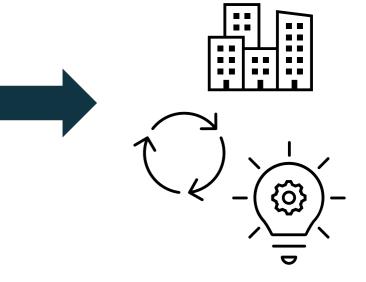
DRAFT & PUBLISH EU LEGISLATIVE PROPOSAL

REVIEW & AMEND EU LEGISLATIVE PROPOSAL

BUSINESS IMPLEMENTATION

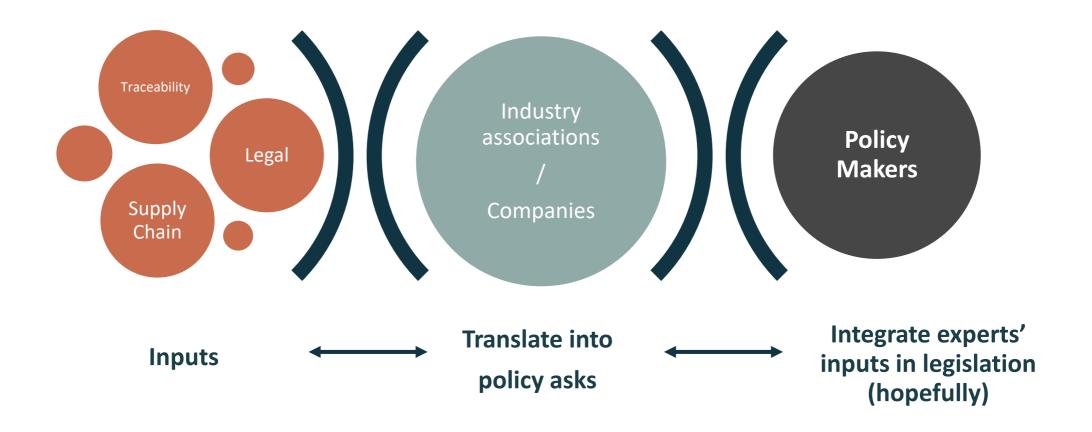








WHAT DO WE MEAN BY INFLUENCE?









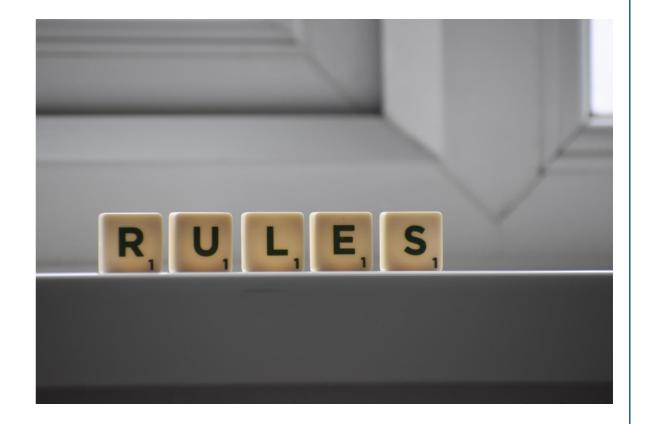
POLITICAL CONTEXT WITHIN THE EUROPEAN UNION





SUSTAINABILITY IS NOW REGULATED

- New license to operate
- Impact the full value chain
- Here to stay = regular review
- Leading trend worldwide







EU LANDSCAPE

EU GREEN DEAL

CONSUMER COMMUNICATION

- Empowering Consumers Directive
- Substantiating Green Claims Directive
- Right to repair
- PEF methodology
- Textile Labelling Regulation Review

COMPANY

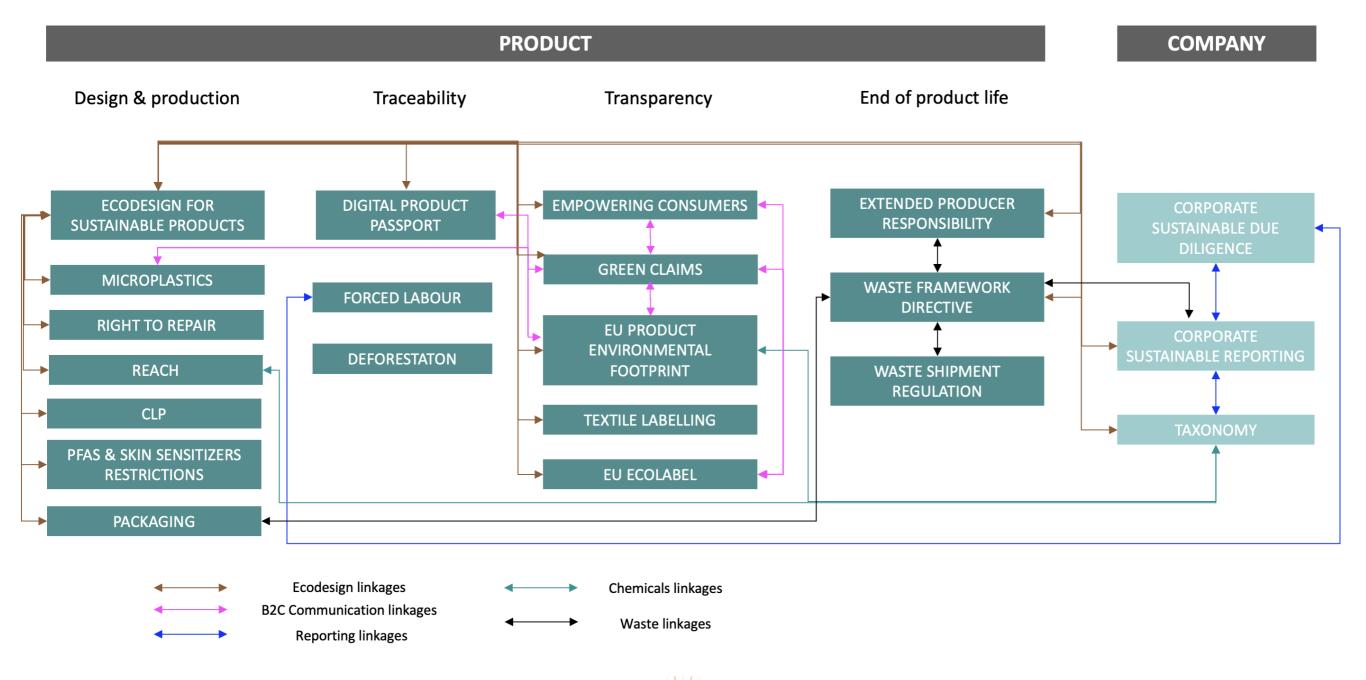
- Sustainable Corporate Due Diligence
- Taxonomy (circular & biodiversity)
- Sustainable Corporate Reporting Directive

PRODUCT

- Eco-design for Sustainable Products Regulation (ESPR)
- Revision of the EU chemical framework (REACH)
- Chemical restrictions (e.g. PFAS)
- Packaging & Packaging Waste Regulation
- Digital Product Passport (included in ESPR)
- EU Forced Labour Regulation
- Deforestation-Free Products Regulation
- Waste Framework Directive (including EPR)











MILESTONES & ROADMAP UNTIL 2030

Forced Labour:

EU to adopt mandatory forced labour legislation

Due Diligence:

EU to adopt mandatory due diligence legislation

Reporting: EU Taxonomy Environmental Delegated Act into force

ESPR: Expected adoption of the EU ESPR Regulation: sets a framework for the EU to set mandatory design requirements Forced Labour:

EU to develop guidelines and forced labour database

Separate collection:

Separate collection obligation of textile waste goes into force

ESPR: First set of design requirements to be adopted

Forced Labour enters into force

Due Diligence enters into force

Waste shipment:

new rules on cross-boarder waste shipment in force

ESPR: First set of design requirements to enter into force

Green Claims enters into force

Waste: Member State Waste Framework Directive and EPR rules go into force (tbc)

Textile labelling: updated rules into force (tbc)

ESPR: Continued development of eco-design rules for textiles

Taxonomy and CSRD reporting: anticipated revision of standards and criteria

Revision and updating of sustainability legislation e.g. on waste recycling

Biodiversity and legislation on **social issues** anticipated

2023 2024

Reporting:

Corporate

in force

Sustainability

Reporting Directive

2025

2026

2027

Compliance with due diligence legislation of the EU country where it has a branch

Compliance with mandatory design requirements

Compliance with EU forced labour legislation 2028/2029

2030 ...

First Taxonomy reporting

First reporting against

Corporate Sustainability Reporting Directive (or 2026) Compliance with updated rules on waste & EPR

Compliance with **Green Claims** requirements

Compliance with national EPR schemes requirements





WHAT ARE THE IMPACTS ON YOUR SUSTAINABILTIY & BUSINESS STRATEGIES?





EXPECTED IMPACTS ON BUSINESSES

- Beyond sustainability impacts: business models, operations from product design to end of life management of garments
- How to market products
- Sustainability reporting & communication to investors
- Require companies to analyse and manage their supply chain risks
- Compliance will likely be as of 2025/2026







IMPACTS AND INDUSTRY ACTORS

BRANDS & RETAILERS

MANUFACTURERS

MATERIAL PRODUCERS

- Define material sourcing strategy
- Define traceability strategy
- Design products
- Market products
- Manage supply chain risks
- Produce products
- Report on sustainability
- Implement climate plans

- New requests as customers will work towards compliance
- Requests will come from EU and non-EU customers
- New requests as customers will work towards compliance
- Increased customers' requests to provide data on materials
- Increased demand for lowimpact and recycled materials

Some obligations will trickle down:

- Gather data ahead of the EU compliance deadline
- Define traceability strategy
- Manage supply chain risks





RECOMMENDED INTERNAL NEXT STEPS





SUSTAINABILITY TRACEABILITY WILL BE KEY

No data = No compliance = No business in Europe







ENSURE EARLY COMPLIANCE



- Keep your business relevant
- Be ahead of the game

YOU CAN'T CLAIM BEING A
SUSTAINABILITY LEADER WITHOUT
COMPLIANCE





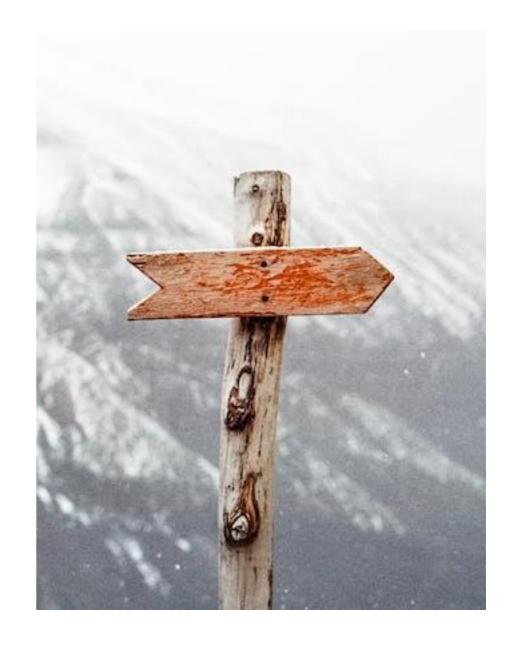
RECOMMENDED STEPS FORWARD

Engage with EU policy makers now

- Leverage industry associations
- Gather facts and examples
- Think long term

Compliance: Do not wait for 2024

- Start the conversation internally and with business partners now
- Establish an implementation project management structure
- Build a traceability strategy







ESTABLISH A COMPLIANCE PROJECT

Key approach to cover all new requirements at once

• Numerous interlinkages between legislation

Long-term project

- Sponsored by top management
- Involve all relevant functions
- Focus on 5 themes:

01. Circularity	02. Consumers	03. Supply chain management	04. Traceability	05. Climate Plan
Eco-designProduct & PackagingWaste strategy	 Product marketing Sustainability Reporting 	Due diligenceForced labor	 Overarching for all laws Data in full value chain Establish IT systems 	• Define a plan for scope 1, 2 and 3 emissions



HIGH-LEVEL LEGISLATIVE TIMELINE

2022-2023

Publication of EU legislative proposals

2022 - 2024

EU institutions to review and adopt the final legislation

2024-2025

Expected final legislation

~2025 - 2027

Implementation within companies!

Business impacts

- Start raising awareness
- Identify gaps in your business processes and sustainability strategy

Business impacts

Opportunity to influence legislation

Business impacts

Final gap analysis and definition of a compliance plan

Business impacts

Mandatory compliance





THANK YOU

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