CALL TO ACTION

Dear Executive Vice-President Ribera,
Dear Commissioners Hansen, Roswall and Várhelyi,

We are writing to you in the context of the European Commission's ongoing efforts to advance its circular economy, bioeconomy and sustainability objectives, including through initiatives such as the Ecodesign for Sustainable Products Regulation (ESPR), the EU Bioeconomy Strategy and the forthcoming Circular Economy Act. Taken together, these legislative developments will have a **profound and lasting impact on the livelihoods of European farmers and rural communities**. In this broader policy landscape, it is essential to fully recognise the environmental, economic and social value of livestock by-products, such as wool and leather, as renewable, biodegradable and locally sourced materials. These materials are strategic resources within Europe's circular bioeconomy, with the potential to contribute to more sustainable production systems, reducing reliance on fossil-based materials and strengthening rural economies. However, their full potential remains underexploited due to a combination of regulatory, methodological and market barriers. We therefore urge the European Commission to ensure that the revision of the Environmental Footprint (EF) methods delivers a fair and science-based framework that does not disadvantage renewable, land-based materials or farmer livelihoods.

As this work progresses with the support of the Ecodesign Forum, the Preparatory Study on Textile Products and the revision of the Environmental Footprint (EF) methods will play a decisive role in determining how the sustainability of garments is defined, measured and applied in practice. Yet, there is a **real and immediate risk that current EF methods misrepresent natural fibres and create a bias in favour of fossil-based synthetic fibres.** This risks enabling greenwashing and undermining the EU's broader sustainability objectives, including those under the EU Bioeconomy Strategy. More fundamentally, it risks overlooking the role of livestock systems not only as sources of raw materials, but as providers of essential ecosystem services, including carbon sequestration, soil health and biodiversity support. **If unaddressed, these distortions will directly affect how farmers' products are valued in the market, with significant consequences for their livelihoods, as well as for European producers and consumers.**

The model used in the current EF method to measure land use requires significant revision. Due to an overly complex methodology and poor data, the model does not adequately reflect the diversity of agricultural systems and land uses across the EU. It wrongly assumes that all land is equally arable, is highly influenced by climatic conditions rather than actual land use, and only indicates negative impacts from using land, consequently ignoring any positive land management practices of farmers that are central to both the Common Agricultural Policy and the EU's wider sustainability objectives. In particular, it fails to capture the fact that large areas of land are not suitable for crop production but are sustainably managed through livestock systems, contributing to landscape maintenance, carbon storage and biodiversity. This narrow approach overlooks the multifunctional role of land in livestock systems, where grazing supports ecosystems while enabling

the production of valuable by-products such as wool and leather, and in doing so underpins the economic sustainability of farming activities in many regions.

On biodiversity, we are concerned that the current direction of the Commission and the Joint Research Centre's work on the revision of EF methods may not fully capture the diversity of production systems and the variety of biodiversity outcomes across the EU. **The use of simplified approaches and broad assumptions may not sufficiently reflect local conditions and the role of farmers' management in shaping biodiversity results.** The methodology must recognize these differences and avoid unintended outcomes that could weaken incentives for sustainable land management. Failing to do so risks discouraging practices that are both environmentally beneficial and economically important for farmers, thereby undermining their ability to maintain viable and resilient livelihoods.

On microplastics, **the ongoing EF methods consultation should be approached through the lens of material persistence and biodegradability**. Synthetic textiles are plastic-based and, when not properly managed at end of life, they can persist in the environment and contribute to long-term pollution. By contrast, natural fibres are renewable and biodegradable under certain soil conditions. A framework that does not clearly distinguish between these fundamentally different materials risks drawing misleading comparisons and weakening efforts to address plastic pollution. It also risks favoring fossil-based materials over bio-based alternatives, which would not only run counter to the EU's sustainability ambitions but also disadvantage farmers by reducing demand for the natural materials they produce.

Beyond methodological concerns, **current EU legislation also creates a regulatory paradox for livestock by-products**. Fibres such as wool, despite being low-risk, renewable and biodegradable, are often treated as waste or subject to **disproportionate administrative requirements under the Animal By-Products Regulation**, limiting their valorization and discouraging circular use. This contradicts the very objectives of the EU's circular economy and bioeconomy frameworks, while at the same time restricting farmers' ability to derive fair value from materials that are integral to their production systems and income streams. Therefore, we call for a **more proportionate, risk-based and harmonised approach to the categorisation of wool under the Animal By-Products Regulation, including its reclassification into a new, lower-risk category or the establishment of harmonised exemptions for low-risk uses**, in order to ease unnecessary administrative burdens, enable its safe on- and off-farm valorisation, and fully recognise its contribution as a circular, bio-based agricultural resource.

Considering the above, **we urge the European Commission to ensure that the revision of the EF methods, outlined as one of the key initiatives in the EU Bioeconomy Strategy, delivers a fair and science-based framework that does not disadvantage renewable, land-based materials.** We call on the Commission to ensure that land use, biodiversity and microplastics are addressed in a coherent and balanced manner, aligned with wider sustainability objectives and supportive of farmers' economic viability. In particular, any sustainability metrics should recognise the positive contributions of sustainable land management, avoid reliance on overly simplistic proxies, and ensure that persistent synthetic materials are not implicitly favoured over natural alternatives. More broadly, EU policy frameworks must reflect the full picture: livestock systems are integral to circular bioeconomy systems, providing renewable materials and ecosystem services that are essential to achieving climate and environmental objectives, while also sustaining the livelihoods of farmers across the Union.

As Members of the European Parliament, we stand ready to support this work and underline the importance of getting this right for European farmers and rural communities, whose livelihoods depend on a fair and forward-looking policy framework. Getting this right is essential for the credibility for the EU's sustainability policies, but also to ensure that farmers, producers and

innovators are empowered to contribute to a more sustainable, circular and resilient European economy, rather and being held back by regulatory bottlenecks.

Yours sincerely,

MEP Benoît Cassart (Renew, Belgium), Co-Chair Sustainable Livestock Intergroup

MEP Alexander Bernhuber (EPP, Austria), Co-Chair Sustainable Livestock Intergroup

MEP Maria Grapini (S&D, Romania), Co-Chair Sustainable Livestock Intergroup