



The case for European policies for progressive regulation of ultra-fast fashion

An exploratory study of the possibilities of targeted regulation

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Abstract

The emergence of ultra-fast fashion (UFF) has become an increasingly discussed phenomenon in recent years. However, there is limited research on what differentiates the UFF business models from the rest of the sector, or how emerging textile policy will affect the business model. Exnovation, or the deliberate phasing out of certain practices, has received increasing attention in research, and has been suggested as possibly applicable to textiles. This exploratory qualitative study seeks to explore UFF's qualitative characteristics, emerging policies in the EU and their impact on the business model, and what improvements could be applied to these policies to facilitate the phasing out, or exnovation, of UFF as it by some is described as a more intensive and resource demanding version of fast fashion. The main methods employed were document analyses and 11 expert interviews, as well as a review of a French legislative proposal, which is the only legislative action specifically targeting UFF to date.

The findings of this study suggest that while UFF is perceived as distinct from fast fashion, there is limited benefit to separating them as UFF is generally described using qualitative characteristics in the data examined in the study. As such, policy targeting UFF will be limited by number of affected companies and the risk of circumvention of such as definition. Furthermore, by excluding conventional fast fashion policy would restrict the benefits of such policy, as the characteristics are largely present across the system rather than isolated to UFF. However, the results also indicate that the broader EU textile policies are limited by their focus on physical characteristics and efficiency. As such, this study suggests that policy would be strengthened by introducing interventions such as targeting of produced volumes, resource use or enforcement of ethical labour conditions to improve both social and environmental performance in the textile industry. Exnovation should thus targets the entire sector's unsustainable practices, rather than be confined to only UFF companies.

Populärvetenskaplig sammanfattning

Modeindustrin står för 8–10 % av de globala utsläppen och kopplas ofta till bristande arbetsförhållanden. Under senare år har fenomenet Ultra-fast fashion (UFF) blivit ett alltmer diskuterat ämne i media och beskrivs ofta som den största boven i modeindustrins påverkan på människor och miljön. Vad är egentligen UFF? Bör företagsmodellen avvecklas från marknaden och hur kan man göra det? Detta är frågor som denna studie syftar till att svara på.

Centralt för denna studie är att man vid för stort fokus på UFF förenklar verkligheten. UFF beskrivs ofta som en intensivare version av fast fashion i litteratur och online, men detta är endast en del av hela sanningen. Snarare är många egenskaper generella för hela modeindustrin än isolerade till UFF, även om dessa generellt beskrivs som mer intensiva för UFF företag i studiens data. Vissa resultat i denna studie tyder också på att intresset för UFF delvis kan ha uppkommit från geopolitiska spänningar och vissa länders intresse för att skydda sina egna ekonomiska intressen. Detta eftersom många av företagen som beskrivs som UFF producenter har icke-europeisk bakgrund, vilket medför att även vinsterna hamnar i icke-Europeiska länder.

Eftersom det finns ett växande intresse för ämnet kan UFF vara ett strategiskt drag för politiker som vill få igenom lagstiftning för textiliers minskade miljöpåverkan. Men om man inte inkluderar andra modeföretag riskerar man samtidigt att missa större vinster för människor och miljö om modevärlden i stort tillåts fortsätta med *business-as-usual*. För att lösa detta problem behövs en större förändring i hur människor konsumerar och hur företag producerar textilier, vilket kräver fler styrmedel än de som rullas ut av EU fram till 2030. Det innebär bland annat att man kommer behöva sluta med både överproduktion och överkonsumtion, men även förändra människors relationer till sina kläder eftersom vi i dagsläget lever i en slit-och-släng kultur. Utöver de policyer som utvecklas i Europa idag, som mestadels är fokuserade på exempelvis att minska produkters miljöavtryck och öka tillgänglig information, visar denna studie även på att man bör reglera producerade volymer, mängden resurser som får användas av företag för att producera produkter av låg kvalitet, men även kontrollera hur företag får marknadsföra sina produkter.

Framträdanden för denna studie är vikten av att se helhetsbilden som central istället för individuella företagsmodeller. Att jaga enskilda modejättar kan bli att sätta plåster på sår, medan resten av modevärlden tillåts fortsätta producera som vanligt, utan att man förbättrar varken miljöpåverkan och människors arbetsförutsättningar i stort.

Abbreviations

UFF – Ultra-fast fashion

FF – Fast fashion

EPR – Extended Producer Responsibility

DPP – Digital Product Passport

ESPR – Ecodesign for Sustainable Products Regulation

SSCT – Strategy for Sustainable and Circular Textiles

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1. Introduction

1.1 Problem statement

Today, clothing is produced, used, and thrown-away at faster rates than ever before (Coscieme et al., 2022; European Environmental Agency (EEA), 2025a; Niinimäki et al., 2020). Research suggests that these production and consumption patterns can be partially explained by the rise of business models using cheap and quick production, and fast changing micro-trends (Marques et al., 2020; Niinimäki et al., 2020; Apparel Impact Institute, 2025). This type of production, generally referred to as fast fashion, has been the dominant business model in the fashion sector since the 2000s (Dzhengiz et al., 2023; Moran et al., 2021). Key to its success is the fulfilment of wants-based rather than needs-based consumerism (Marques et al., 2020). This allows consumers access to on-trend-clothing at low prices (Joy et al., 2012), but also contributes to short-term use cycles, early obsolescence and high waste generation by encouraging over-production and -consumption (Niinimäki et al., 2020).

Within this context, textiles have emerged as one of the most polluting and resource intensive industries of the global economy, commonly associated with social injustices and poor labour ethics (Niinimäki et al., 2020; Shirvanimoghaddam et al., 2020). Today, emissions because of textile consumption are more than double the limit for clothing consumption necessary for climate neutrality by 2030 (EEA, 2025b; Coscieme et al., 2022). This trajectory is mirrored in the European Union (EU), where consumption of textiles reached 19 kilograms of textiles per capita in 2022 (EEA, 2025a).

More recently the greenhouse gas (GHG) emissions from the sector have increased, which The Apparel Impact Institute (2025) partly attributes to the emergence of Ultra-fast fashion (UFF) companies in combination with high use of synthetics in the sector. Although the UFF concept lacks a scientific and legal definition, it is generally used to refer to companies with even shorter lead times and lower prices than conventional fast fashion. These characteristics are often combined with the use of influencers and social media as marketing mediums with sales almost exclusively provided through e-commerce (Koep-Andrieu & Del Valle, 2025; Mahmood, 2022).

Circular economy policy has been proposed as a solution to address the sustainability issues of the textile industry (e.g. Puglia et al., 2024; Ellen MacArthur Foundation (EMF), 2017). Textiles have been identified as a priority sector by the European Commission (2020) in its Circular Economy Action Plan. According to the EC (2022) the plan's textile targets are to be operationalised in the Strategy for Sustainable and Circular Textiles (SSCT) (EC, 2022). However, research indicates that the current policy landscape is limited. Many policies are still emerging, unevenly distributed across textiles' life cycle, and subject to the risk of unintended effects (Puglia et al., 2024; Solis et al., 2025).

Policy in general mainly focuses on efficiency improvements of production, without addressing overconsumption or overproduction (Chenavaz & Dimitrov, 2025; Dalhammar et al., 2022; United Nations Environment Programme, 2025). scholars have suggested sufficiency, as opposed to efficiency, as an alternative policy approach (Dalhammar et al., 2022). Sufficiency entails promoting an economy decoupled from the current paradigm of continuous economic growth (Chenavaz & Dimitrov, 2025). Due to the urgency of sustainability issues, and the urgent need for

transition and innovation, which tends to be constrained by the lock-ins of existing systems, some researchers suggest that relying only on innovative and supportive policy will not be enough. Instead, policy should also contribute to the phasing out of unsustainable practices (Heyen et al., 2017; Kivimaa & Kern, 2016; Puglia et al., 2024;). This process can be denoted as exnovation, which refers to the intentional and planned termination of technologies, products, and practices (Heyen et al., 2017). Exnovation has previously mainly been researched in relation to the energy sector (e.g. Kiviima & Kern, 2017) or as an overall concept (e.g. Heyen et al., 2017; Fuchs & Ziegler, 2024) but is applicable to all existing practices. Consequently, policy mixes combining phasing out linear practices with innovation support is therefore discussed as vital to a systemic shift towards circular economies (Curran & Joltreau, 2026; Puglia et al., 2024), motivating an exnovative approach.

1.2 Existing knowledge and research gaps

1.2.1 UFF

UFF is a relatively new and under researched topic in comparison to ~~that on~~ the fast fashion business model (Camargo et al., 2020; Dzhengiz et al., 2023; Uchańska-Bieniusiewicz & Oblój, 2023). Research on UFF has to date mainly explored the success of the business model overall (Camargo et al., 2020) or through case studies of Shein, (Lu & Mullen, 2022), system analysis (Chan et al., 2025), or consumer engagement (Sallaku et al., 2025). Although some research suggests increased policy attention is needed on the fashion sector e.g. through extended producer responsibilities and alternative forms of consumption and production (Niinimäki et al., 2020), no research could be identified on policy specifically targeting UFF. France is the first country proposing legislation directly targeting UFF (Dedorsen, 2024; Reuters, 2025), having proposed a legislation to specifically target UFF companies.

1.2.2 EU textile policies

Policy specifically targeting UFF is limited or non-existent in the EU. To date, only one French legislative proposal exists specifically targeting UFF (Reuters, 2025). Similarly, a gap was identified in research on the exnovation of textiles. However, as UFF is part of the textile industry, UFF companies will be subject to planned textile policies or instruments, which may have the potential to be adapted for exnovation of unsustainable practices.

At the core of the EU' textile policy is the SSCT, that outlines the policy direction to achieve a sustainable and circular sector by 2030 (EC, n.d.). Core actions include the ecodesign criteria of the Ecodesign for Sustainable Products Regulation (hereafter ESPR) and the ESPR's digital product passports (DPP), as well as the prohibition of destruction of unsold goods (EC, 2022). Furthermore, the SSCT outlines the harmonization of design requirements with adjustments of Extended Producer Responsibility (EPR) fees through eco-modulation according to the EC's communication of the SSCT (2022). This section briefly describes some of the policy actions which will be applicable to textiles on the EU market by 2030 following the implementation of the actions of the SSCT. This is not an exhaustive mapping, rather, it provides some background to policy actions explored in the thesis.

1.2.2.1 Ecodesign for Sustainable Products Regulation (ESPR)

The regulation of Ecodesign Requirements for Sustainable Products (Regulation 2024/1781) was adopted in 2024, establishing a framework to establish requirements on specific product aspects. Key

examples of these are ecodesign criteria to improve environmental performance of concerned products, limit premature waste production, and increase availability of product information according to the regulation (Regulation 2024/1781).

Ecodesign requirements be adopted to require producers to improve the performance and lifespan of textiles and garments to improve a products performance in e.g. durability, reusability, resource efficiency and repairability according to chapter II article 5 of the EU regulation establishing a framework for the setting of ecodesign requirements for sustainable products according to the ESPR. They will also contribute to eliminating premature obsolescence based on design choices and poor component quality according to chapter II article 5 of the ESPR. Increased durability has been indicated by some research to contribute to longer use, as early disposal is mainly caused by consumers experiencing degeneration of quality by e.g. pilling, seam failures and other durability or performance issues (Cooper & Claxton, 2022; Laitala et al., 2015). The regulation is also likely to include requirements to facilitate reclamation of materials according to chapter II article 5 of the ESPR. Some research indicates that this is a core issue of the current system, as it does not allow for easy disassembly or reclamation of materials (e.g. Curran & Joletreau, 2026; EMF, 2017). However, some research also indicates that a key limitation for policy increasing durability is that it cannot address the impacts of emotional durability, related to e.g. aesthetics or boredom, on the discarding of clothing (Bauer et al., 2018; Cooper & Claxton, 2022; Maldini et al., 2025).

Digital Product Passports (DPPs) are digital documents containing information such as unique product identifiers, disposal guidance and information on substances of concern (Environmental Coalition on Standards, 2026; European Data, 2024). DPPs aim to improve the accessibility of information between consumers and brands, as well as brands and their suppliers according to point 32 of the ESPR. The included information will relate to the circularity and ‘key environmental aspects’ relevant to the textiles to support the ‘visibility and credibility of sustainable companies and products’ according to the SSCT (EC, 2022). Some research suggests that DPP’s could contribute to increased transparency and information sharing in the textile industry, supporting sustainable and circular development as well as sustainable consumer decision-making (Becchi et al., 2026; Carvalho et al., 2025)

The ESPR also includes a ban on destruction of unsold consumer products according to chapter VI article 25 1. Additionally, it stipulates a requirement for companies to divulge the number of products that they discard, why they were discarded, and how they are treated afterwards according to chapter VI article 24 of the ESPR. Such an intervention aims to provide economic disincentives to production in line with a linear economy (Puglia et al., 2024) to limit the waste of resources and loss of economic value through destruction of functioning products (Rödig et al., 2021).

1.2.2.2 Ecomodulation

Ecomodulation of textile waste is an intervention already in place in the French legal system according to Eunomia (2022) and it will be introduced broadly in the EU following the inclusion of obligatory EPR schemes for textiles and footwear in the Waste Framework Directive (EC, 2022). The instrument will support the internalisation of environmental impacts from textile production by introducing a fee on all products placed on the market, with the final fee possibly being modified based on a product’s sustainability performance according to criteria such as those of the ESPR according to article 22c of the directive amending Directive 2008/98/EC on waste (Directive 2025/1892).

1.2.3 Other policy ideas

This section briefly describes some other policy interventions which have been identified as possible in relation to textiles.

1.2.3.1 Import tax

Due to increased online commerce, imports of small parcels have increased. Such parcels were previously exempt from value-added taxes, which has benefitted companies like Shein who send small parcels directly to their consumers (Uchańska-Bieniusiewicz & Oblój, 2023, Camargo et al, 2020). Since 2021 the EU has introduced a mandated tax on imported small parcels to limit such imports (European Council, 2025a; 2025b).

1.2.3.1 Marketing and advertising regulation

Marketing has been recognised as an important factor in consumer behaviour related to fashion consumption (Hot or Cool Institute, 2026 (HCI); Nguyen, 2026), and previous research indicates that bans and restrictions of advertising have had an effect on consumption on products like alcohol (e.g. Giesbrecht et al., 2024). One study has also found evidence that advertising restrictions may support innovation in more sustainable alternatives (McDowall & Underthun, 2025), showing that marketing restrictions may have an effect on consumer behaviours.

1.2.3.2 Geographic origin

Research suggests that including information on Country of origin can influence consumer's perceptions of product quality, environmental sustainability and labour equity (Bourdin et al., 2021; Creux-Martelli et al., 2023). Willingness-to-pay (WTP) has also been found to correlate with the individual's attitude towards the COO (Boufous et al., 2023). However, research also indicates that consumers' price sensitivity is influential in the application of this information in real life (Blas Riesgo et al., 2023).

1.2.3.3 Subsidies

Price is a key concern for consumers, and the low prices has been a key factor in the emergence of both Fast Fashion (FF) and UFF (Colasante et al., 2023; Niinimäki et al., 2020). Consumers' have been shown to have a higher WTP for sustainable clothing, although price is still perceived as the main barrier to consumption of more sustainable products (Cascavilla et al., 2026,). Some research suggests that positive economic incentives may be more influential than restrictive incentives to influence sustainable consumption (Persson et al., 2015). One example of such an intervention could be levelling the price between circular and linear products e.g. by combining taxes with subsidies on sustainable products, which Cascavilla et al. (2026) found could be more effective in overcoming price barriers for sustainable consumption than taxation, especially in low-income groups.

1.3 Aim and Research questions

This exploratory study aims to contribute to characterisation of UFF, as well as explore how potential policies could be implemented to support UFF's removal from the European market. Due to limited previous research on the subject, this study relies on empirical data. The following questions were formulated to guide the research:

- I. What are the determining characteristics of UFF?
- II. How are policies currently used to reduce or eliminate UFF?
- III. What are the most important aspects that policy must address?
- IV. What policy gaps must be addressed?

1.3.1 Scope and Delimitations

The value chains of the textile and fashion industry are global in nature. UFF is therefore explored as a global phenomenon. A geographical limitation would result in the decoupling of the producing countries from the consumers who would be subject to some of the policies in the thesis. However, due to the constraints inherent to any thesis, the exploration of potential policies is delimited to an EU context, with the new French legislative proposal evaluated as the first and only regulation targeting UFF constituting a case study. Textile waste regulation was excluded due to limitations in time and scope of the thesis, and the results also excluded subsidies on sustainable products as a potential instrument due to space constraints.

The thesis does not explore policies which are applicable for general purposes, such as REACH that regulates substances, as doing so would broaden the aim of the study outside of what the scope allows. Additionally, it excludes public procurement, as this is less relevant for UFF than individual consumption. As such, this research focuses on policies which have been presented in the current SSCT or the French legislative proposal, whilst excluding policies like the Corporate Sustainability Due Diligence Directive and the Waste Framework Directive, although specific instruments pertaining to these directives are included when relevant. Applying a similar logic, this study also excludes any national legislations and interventions outside of those in the case study of the French proposal. Documents were excluded from the analysis if they were available in another language than French, English or Swedish, or were behind a non-accessible paywall.

1.4 Environmental relevance

This thesis was written as a degree project as part of the master's programme in Strategic Environmental Management at Lund University. The fashion industry, and particularly UFF, has been connected to severe environmental and social consequences related to both production and consumption. These include e.g. high GHG emissions, unethical work conditions, and high waste generation (e.g. Niinimäki et al., 2020, Shirvanogiddam, 2020). Limiting or removing the presence of such business models is thus of interest to the environmental policy landscape at large, with exnovation as a possible approach to achieving this.

1.5 Ethical considerations

Good research practice relies on four core tenets: reliability, honesty, respect, and accountability. The implementation of these principles during research are fundamental to ensure the quality of the resulting product (Vetenskapsrådet & Åkerman, 2024). By following these fundamentals, the study aims to be as reliable and valid as possible.

This study was based on analysis of empirical data from interviewees as well as documents. When research concerns any individual, the resulting risks to the person must be minimised

(Vetenskapsrådet & Åkerman, 2024). This is of especial importance considering that interviews concern the processing of personal data, which makes collection subject to GDPR (Vetenskapsrådet & Åkerman, 2024). Informed consent is thus essential to any interview study, to allow the interviewee to understand and accept what participation entails, and the consent must be documented. To ensure this, the participant must also be given sufficient information to base their consent upon, as well as given the possibility to withdraw at any time (Vetenskapsrådet & Åkerman, 2024). To comply with these criteria, this study utilised information and consent sheets which were signed by the participant before or after the interview as, wherein the individual will be able to accept the conditions of participating in an interview (see appendices A, B, C). Prior to audio recording, participants were also informed that their participation was voluntary, that they had the option of withdrawing at any time, and were asked for their consent to record and participate. Furthermore, to ensure the safety and confidentiality of the interviewee's information, respondents were pseudonymised based on their basic job description. This was done for all respondents except one, who explicitly asked to not be pseudonymised. Data from the interview was stored on one computer and not shared with anyone aside from the study's supervisor.

2. Method

This study is part of the research project ”*Developing a policy mix to eliminate ultra-fast fashion from the European market: a roadmap for national and European policymakers*”, financed by the Swedish innovation programme RE:Source. It employed a qualitative exploratory multi-method study design by combining semi-structured interviews with document analysis.

An exploratory approach was motivated by the limited prior research on UFF and textile policies. Consequently, the study was also iterative in nature to allow for comparisons between the different rounds of data collection and analyses (Bryman, 2025). Similarly to the previous research on the subject, this thesis utilised mainly digital media content, supported by the articles available on the subject, as a means of providing characteristics of environmental impacts of UFF. This data was complemented by expert interviews, wherein respondents were asked to contribute with their understanding of UFF. Additionally, respondents were asked to give their views on current policy, as well as what policy gaps exist in today’s landscape.

To provide an overview of the research subject, an initial literature search and review was conducted using the search terms “ultra-fast fashion” and “ultra-fresh fashion” in Web of Science and Scopus. The search was limited by excluding any publications which were not articles, review articles or early access articles as well as those which were not available in English. Using these criteria, the search yielded eight documents, which were all included for a following review of their abstracts and contents. A secondary exploratory search was conducted using Web of Science for a literature overview regarding the EU policy landscape, as well as interventions of the current textile policies and the instruments identified in the French case study (ch. 1.2). This was supplemented with snowball sampling in the identified literature to provide an overview of the different instruments used in the secondary round of interviews. This search aimed to provide background, rather than an exhaustive review. The research process is depicted in figure 1.

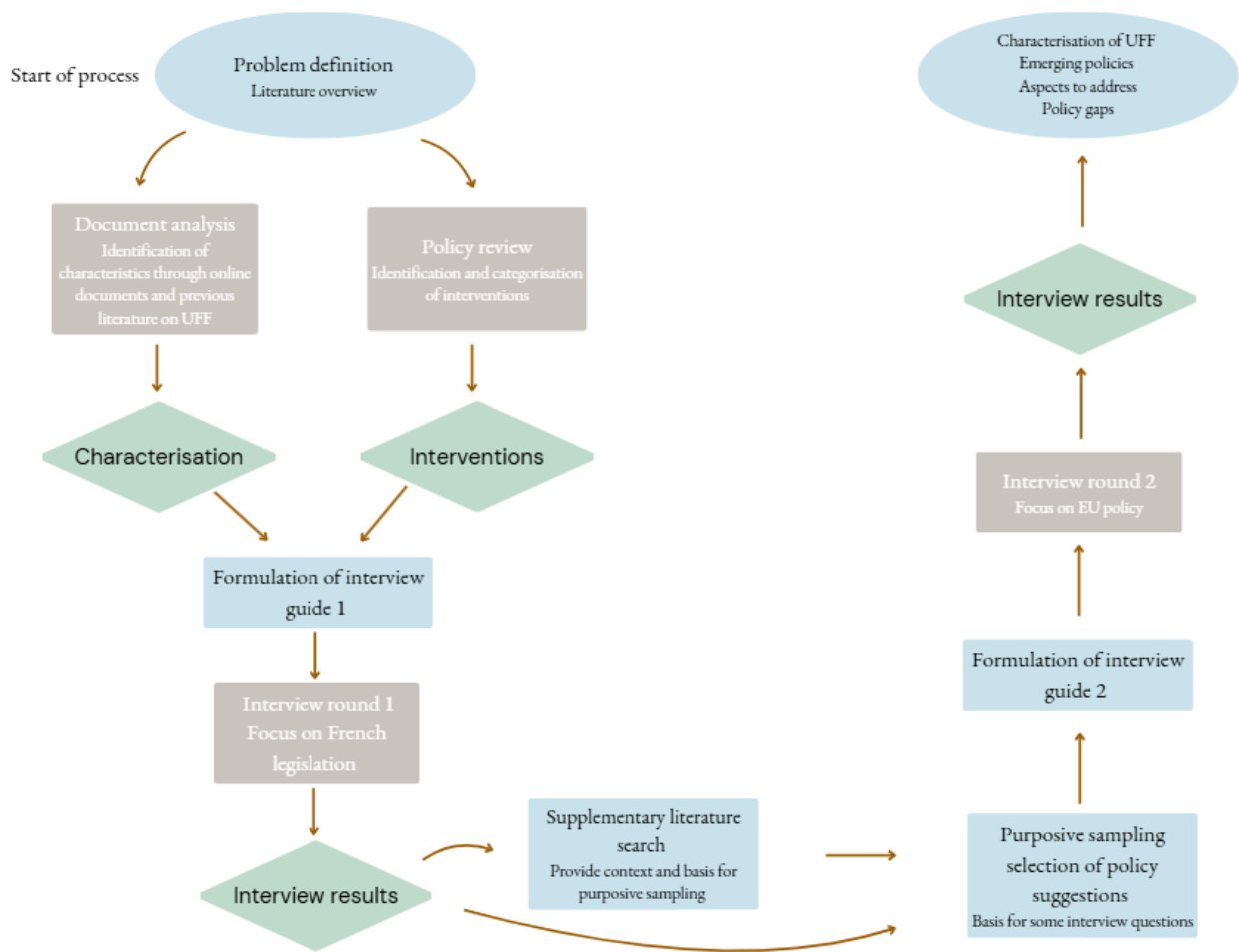


Figure 1. Visual description of the research process.

2.1 Data collection

As shown in figure 1 above, data collection was conducted in four phases. The first phase focused on characterisation of UFF through an analysis of online documents and a review of the available scientific articles. The second centred on the French proposal as a case study. The third phase was based on the information collected in the first and second phases to identify possible policies for exnovation on an EU scale. In phase four, the preceding results were used for the final round of interviews for policy options for the exnovation of UFF on an EU level.

2.1.1 Documents

Document analysis encourages creative approaches to data collection and analysis in areas of research (Bryman, 2025), complementing the flexibility required by explorative research (Stebbins, 2011). As this thesis explores a subject with limited availability of firsthand data from UFF companies, document analysis is a useful method of data triangulation to reach comprehensive conclusions on the concerned subjects (Bryman, 2025; Patton, 1999). Several different types of documents were analysed including policies, newspapers, blogs, and other online documents. Documents were selected using Scott's (1990)

four criteria for authenticity, credibility, representativeness, and meaning. This allowed for the assessment of the publisher, the purpose of its publication and its validity in the context of the research.

Because documents are context sensitive and created for specific audiences, their interpretation requires an understanding of the setting in which they were created (Asdaal & Reinertsen, 2022; Clarke, 2007; Bryman, 2025). This is especially true for online documents, which are prone to editing and removal over time (Bryman, 2025). To mitigate this risk, this study employed web scraping¹ through Ncapture, allowing local coding using the software NVIVO. Despite this, the online document analysis should be understood as a representation of the discourse on UFF at the time of writing rather than a static characterisation.

The policy review of the French proposed bill AN, n° 1557 17e was an exploratory case. The instruments suggested in the policy were used to provide a basis for the interview guides to identify possible interventions for exnovation of UFF on an EU level.

All documents were collected and analysed during February and March 2026. The literature search resulted in 10 articles; two of which were excluded as they provided no descriptors of UFF. The included articles are presented in table 1.

Table 1. Included scientific literature on UFF and the corresponding ID to which it was referred to in ch. 3.1.

Reference	ID
Camargo et al. (2020)	A
Dzhengiz et al. (2023)	B
Uchańska-Bieniusiewicz & Oblój (2023)	C
Lu & Mullen (2024)	D
Chen et al. (2025)	E
Sallaku et al. (2025)	F
Nguyen et al. (2026)	G

The articles identified and included in the literature overview were also used as a source of empirical data for the triangulation of characteristics of the UFF business model. Online sources were identified by Google searches using the search terms “Ultra-fast fashion”, “Ultra-fresh fashion”, “Mode ephemeral”. The resulting websites were evaluated based on Scott’s four criteria as well as whether they contained qualitative descriptors of UFF. Data sources which did not elaborate on what UFF were thus excluded. The included documents and their references are presented in appendix D.

2.1.2 Interviews

Interviews were conducted in two rounds. The first focused on the French case study and its interventions, whilst the second focused generally on suggested policy interventions based on emerging EU policies and those of the French proposal. Audio recordings were used as the basis for transcription. Semi-structured interviews were conducted due to the method’s flexibility, allowing respondents to elaborate on the discussed topics reflecting their individual expertise (Bryman, 2025). This also allows

¹ Extraction of data from online sources (Lumivero, 2026)

the interviewer to ask follow-up questions and expand on new topics arising during the interviews, further contextualising the data. However, interviews also include the risk of bias from social desirability, where respondents may choose to either not answer questions or answer questions in a way that reflects what they believe to be the ‘correct answer’. To mitigate this risk, questions were formulated to be neutral and respondents were pseudonymized, unless they specifically asked to not be according to interview round and role. Six individuals were interviewed in the first round of interviews and five in the second round. Consent for recording was noted prior to recording was initiated. Their respective pseudonym, interview round and noted consent is presented in table 2.

Table 2. The eleven respondents interviewed in this thesis.

Researchers	Interview round	Verbal consent
Ingun Grimstad Klepp, professor in clothing and sustainability (IGK)	1	Yes
Fashion industry expert (FTE)	1	Yes
Expert in e-commerce and fashion (EEF)	2	Yes
Textile consumption and innovations expert (TCIE)	2	Yes
Expert in environmental policy (EEP)	1	Yes
Sector experts	Interview round	Verbal consent
Circular fashion expert (CFE1)	1	Yes
Circular fashion expert (CFE2)	1	Yes
Policy experts	Interview round	Verbal consent
Policy expert 1	2	Yes
Policy expert 2	2	Yes
Non-Governmental Organisations (NGO)	Interview round	Verbal consent
International trade expert (ITA)	1	Yes
International trade policy expert (ITPE)	2	Yes

Interviewees were contacted using purposive sampling through review of recently published literature on textile policy and UFF, as well as snowball sampling by way of suggestions from the interviewees. Of the contacted individuals, 11 respondents were included due to time constraints and answer frequency. Included respondents were researchers and experts in policy and textiles, sector experts, and experts at NGOs working on international trade. Additionally, some interviewees were suggested by

the thesis supervisor. The combination of strategic and snowball selection was motivated by the limited previous knowledge on UFF, and policies to address UFF, with the chosen method allowing experts to suggest others who may be of interest to this study. Interviews were conducted in Swedish, Norwegian and English; some citations were thus translated into English for clarity when included in the thesis. Although this risks misinterpretation through translation, Abfalter et al. (2021) suggests that communication in native language improves the quality of results by increasing the comfort of both respondent and researcher, and the risk was therefore deemed small in comparison to the benefits.

2.2 Method of Analysis

2.2.1 Document analysis

The most common type of analysis used in document analysis is of their contents; wherein collected literature and publications are explored to identify themes through coding and categorisation (Bryman, 2025). This allows the researcher to identify common themes among several types of documents from which conclusions can be drawn.

2.2.1.1 Analysis of online documents and scientific articles

The identified articles and online documents were analysed using an inductive content analysis. The method is commonly used in areas with limited previous knowledge, as it allows identification of common themes during the coding process (Bryman, 2025; Elo & Kyngäs, 2008). In both the articles and the online documents' themes were identified of descriptions across their respective data sets, which were then used to create the coding frameworks. The resulting codes were then aggregated for each dataset into eight and 11 themes respectively, representing the overarching characteristics of UFF.

Some online documents were available in French and Swedish, with the former being read in the original language as well as a translated version to ensure complete understanding by the researcher.

2.2.1.2 Policy review and identification of interventions

The French policy proposal was analysed through a qualitative content analysis, to identify what interventions were proposed. Depending on what mechanism the intervention uses to correct and steer behaviour, the instrument was either coded as regulatory, economic, or informative using the typology systems of Mont & Dahlhammar (2005).

Regulatory and economic instruments are mainly providing incentives for change either through enforcement of rules stipulated by an authority, or through providing economic incentives or disincentives, respectively (Mont & Dalhammar, 2005). In contrast with regulatory measures, economic instruments have some measure of voluntary action those whom it targets, as it awards or removes material resources from the targeted objects depending on adherence to the instrument. Finally, authorities or institutional bodies may use informative instruments to steer behaviour in a desired direction using communication of knowledge, advice, arguments or other measures (Mont & Dalhammar, 2005). The typology also suggests a categorisation based on whether the intervention is voluntary in nature, however, this was deemed as irrelevant in relation to the aim of the study being identification of policy for exnovation purposes.

The French proposition was only available in the original language. Analysis in the original language was therefore combined with the analysis of multiple translations to produce the highest

reliability. Translations were performed by a combination of generative AI (DeepL, ChatGPT) and Google Translate. The results were corroborated by a French legislation expert to ensure validity of the translation, as well as compared to descriptions of the legislations contents in grey literature, government websites and other online documents to improve its reliability through data triangulation.

2.2.1.3 Selection of instruments for the second round of interviews

Interviewees in the second round of interviews were asked to give their opinions on the interventions in semi-structured interviews, as such, the policy review contributed to the formulation of the interview guides presented in Appendix F and G. However, as the SSCT's delegated acts are under development, there are no available Ecodesign criteria for textiles available yet according to the EC's Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030 (EC, 2025). The secondary interview guide was therefore supplemented by criteria derived from Bauer et al.'s (2018) report 'Potential Ecodesign Requirements for Textiles and Furniture'.

The interview guide for the second round of interviews included suggestions based on some of the interventions of the EU's emerging textile policy, combined with some of the interventions discussed in the interviews. Interventions determined to be of interest for further exploration using a strategic purposive sampling (Bryman, 2025) based on:

- I. Discussions with interviewees in the first round
- II. Relevance for UFF based on the identified characteristics
- III. Previous research on EU textile policy
- IV. Review of policy briefs and reports on sustainable textile policy

Table 3 presents the interventions which were discussed with interviewees in round two, based on the emerging EU textile policies and interview suggestions. Additionally, when exploring literature for textile policy in the EU, one study on the effect of subsidies in sustainable consumption was identified, motivating its inclusion as a possible instrument to steer consumers towards a more sustainable consumption.

Table 3. Existing or developing policies from the EU and France which could be of interest for the exnovation or regulation of UFF.

Policy intervention	Source
Prohibition or regulation of marketing	French case study
Ecomodulation based on environmental performance	French case study, SSCT
Ban on destruction of unsold goods	SSCT, ESPR
Ecodesign requirements - Minimum amount of recycled fibres (Bauer et al., 2018) -Durability to resist colour. shape change, pilling, quality of fasteners etc. (Bauer et al., 2018) -Criteria on material quality (Bauer et al., 2018)	ESPR, SSCT, Bauer et al. (2018)
Digital Product Pass	SSCT, ESPR
Origin labelling	French case study
Import tax	French case study
Subsidies on sustainable products	Cascavilla et al. (2026)

2.2.2 Analysis of interviews

A thematic content analysis was used for the analysis of the interviews which allows for the identification of similarities and differences between the different interviewees whilst simultaneously providing a systematic framework for the analysis (Bryman, 2025). By using an abductive approach, the interviews were coded based on the themes of the interview guides, whilst allowing for coding of additional information. Transcripts were formulated using Microsoft Word's transcription function combined with editing to ensure coherence with the audio material. Transcribed material was edited for clarity to ensure cognisance in the included material by removing filler words and repetitions according to the suggestions by Bryman (2025). Respondents were contacted for clarification purposes in some instances to ensure validity in the results.

3. Results

Given the lack of prior research on both UFF, much of the results in this thesis is derived from original empirical data. Below, the results of the document analysis are presented in 3.1, the results of the policy review in 3.2, and the results from the two rounds of interviews presented in 3.3 and 3.4 respectively.

3.1 Document analysis of UFF characteristics

This section presents the results of the content analysis of both the scientific literature's and 26 online documents' description of UFF.

3.1.1 Analysis of published literature

The identified articles were used as a source of data for the triangulation of UFF characteristics, the results of which are presented below in table 4. UFF can, based on the analysis, be characterised as: a faster version of FF, with low prices, high impacts, short lead times and strong marketing capacities facilitated by high technological integration. Sales occur mainly on the companies' own e-commerce marketplaces, which are developed to promote consumption through marketing strategies both on the website itself and in social media. By monitoring consumer behaviour and trends on social media and their own e-commerce marketplaces using data analytics and AI, UFF companies adapt production through trial runs with small batches. Depending on the reception, production is then either discontinued or accelerated, resulting in high product turnover.

Social media is also described as a key component of the tailored marketing theme, as the technical integration of UFF brands was described as providing marketing that is aggressive and tailored to the individual consumer, and facilitating consumption by ease of access. Consumption is further incentivised using influencers and celebrities who promote and sell their products on social media sites, further enhancing the environmental and social burdens of production. Four out of seven studies also connect UFF to specific companies, with three using Shein as a case-study (see table 4). Table 4 presents the identified themes, or characteristics, of the document analysis by source.

Table 4. Characteristics derived from the analysis of the identified scientific literature available on UFF business models and companies.

Characteristics	Descriptions	Source
Company-specific	UFF is often exemplified using specific companies. Shein is used as an individual case study in three of seven articles.	A, C, D, F
E-commerce	UFF producers mainly carry out their mode of sales online.	A, C, D, E, G
Short lead time	UFF is agile, adaptable and faster than FF, partially facilitated by strong technological integration throughout the supply chain	A, B, C, D, F, G
High turnover	Producers release new and large numbers of references at a high frequency and variety.	C, E, F, G
Low price	UFF products are described as low priced and affordable.	A, B, C, D, E, G
Monitoring	Trends and consumer desires are identified through extensive big data analytics of consumption, social media etc.	A, B, E, F, G
High impacts	UFF is described as promoting overconsumption, in turn potentially resulting in detrimental effects on the environment and continuation of poor labour practices.	A, B, D, E, F, G
Tailored marketing	UFF uses a range of marketing tactics centered around social media, celebrity/influencer culture and data analytics to incentivise consumption and promote their brand.	A, B, C, D, E, F, G

3.1.2 Analysis of online documents

According to online documents, UFF can be characterised as a dominantly e-commerce-based business mode with high environmental and social impacts. Products have low durability and are sold at low prices, and new references are introduced at a high rate through short lead times. Companies use monitoring of its customer base combined with tailored marketing to attract consumption. Finally, companies are often lacking in transparency, and are commonly discussed in relation to specific brands, often of non-European origin. However, some sources also use the two terms interchangeably. The characteristics resulting from the content analysis are presented in table 5, with appendix E presenting each characteristic and its origin references.

Table 5. Characteristics derived from the analysis of online media describing UFF

Characteristic	Description
Company-specific	Often associated with specific brands. Shein is usually described as the originator or the most successful iteration of the UFF model.
E-commerce	E-commerce is the most common, and often only, mode of sales.
High impacts	Often described as having detrimental effects on the environment and associated poor labour conditions.
High turnover	Companies frequently launch new products at a very quick rate, broad variety and large number of product references.
Low durability	Products are of low quality and used for a short time. Some sources allege large use of synthetics.
Low price	UFF products are generally described as very or extremely cheap.
Low transparency	Limited or no visibility on business practices and worker conditions.
Monitoring	Brands use big data analytics and real time monitoring to identify trends and consumer demands.
Non-European	Generally referred to as either Chinese or non-European in origin or country of production.
Short lead times	Production is both agile and quick, resulting in short lead times. Companies have many independent manufacturers. Imported directly by consumers.
Tailored Marketing	Employs efficient and aggressive marketing strategies, where social media plays an integral role.

3.2 Policy review of the French legislative proposal

This section presents the results of the policy review of the French legislative proposal bill AN, n° 1557 17^e législature; *propos de loi visant à réduire l'impact environnemental de l'industrie textile* (henceforth Loi 1557). Neither the law or its interventions and their threshold levels have been finalised or formally promulgated. The proposal targets the textile industry but more specifically the industrial and commercial practices of the UFF fashion industry (Article 1-2, Loi 1557). The proposal identifies UFF producers as those producers whose practices result in a decrease in duration of use or the life span of new textile products intended for private or household use (article 1, 1, Loi 1557). This must be a consequence of either the producer placing many new product references on the market, or the producer failing to provide incentives for reparation of these products. The identified interventions are described in table 6, and categorised based on their assigned category of instrument.

Table 6. Proposed interventions categorised using Mont & Dalhammar's (2005) typology.

Reference	Intervention	Typology
Article 1; 8	Digital marketplaces must provide information encouraging sobriety, recycling, reuse etc.	Informative
Article 1; 11	Ban on using “free” as marketing tool	Regulatory
Article 1, bis AA; 2	The origin of the textile item must be made clear to the consumers on the online platform	Informative
Article 1, bis AB	UFF producers become ineligible for tax reduction	Economic
Article 2; 9	Non-european producers required to appoint a designated representative ² in France	Regulatory
Article 2; 15	Amendment to fee modulation ³ to account for durability impacts linked to producers’ industrial and commercial practices	Economic
Article 2; 16	A company with EPR obligation that receives a penalty may not receive bonus	Economic
Article 2; 18	A fraction of the EPR fee is redirected to collection and recycling infrastructure	Economic
Article 2; 20	Waste management companies must have approved systems or contracts for textile products	Regulatory
Article 3; 2	Ban on marketing of UFF products	Regulatory
Article 3 bis; 2	Ban on influencer marketing of UFF	Regulatory
Article 6; 1-2	Amendment of Education Code to include critical thinking with regards to sustainability in fashion	Informative
Article 8; 1,2,4	Tax on small packages from outside EU	Economic

3.2.1 Regulatory instruments

In the French proposal, 13 policy interventions were identified. Of the 13 identified policy interventions, six were categorised as only regulatory, mainly concerned with amendments to already existing legislation. Marketing regulation was the most common theme among the regulatory instruments, with the majority being aimed at restricting UFF producers' advertising possibilities. The proposal would, if accepted, introduce a complete ban on advertising of UFF products (Article 3, 2, Loi 1557), as well as expand on the existing regulation on influencer marketing to include prohibition of UFF producers (article 3 bis, 2, Loi 1557). Influencers would, in effect, be entirely prohibited from

²The designated representative will be obliged to ensure fulfilment of obligations according to the Extended Producer Responsibility.

³Fee modulation refers to the “modification of fees paid by producers [...] based on measurable product characteristics” (Laubinger et al., 2021)

marketing products or companies defined as UFF according to article 1. Finally, the third marketing regulation would disallow companies from using the word “free” as a promotional tool for UFF producers (Article 1, 11, Loi 1557).

In addition to the marketing restrictions, three other regulatory instruments were identified; an amendment to the Extended Producer Responsibility (EPR), and requirements imposed on waste management operators. Regarding the former, the proposal includes a suggestion of a requirement for non-European companies to appoint a natural or legal person in France as a representative for the company. This natural or legal person will thus be held legally responsible for the company’s fulfilment of obligations according to the EPR regulations. In terms of waste management and recycling, operators would either be required to have contracts in place with an approved eco-organisation, or individually approved contracts according to article 2, 20 (Loi 1557).

3.2.2 Economic instruments

The proposal also includes several economic instruments applied to UFF producers. All the included interventions concern regulation of consumption and production through taxes, fees or price modulation, with the majority being aimed at producers.

Article 1 bis AB (Loi 1557) would disallow the access of UFF producers to an existing tax reduction scheme for charitable donations. Furthermore, the law would introduce a fee of 5 euros in 2025 for all products encompassed by the EPR, increasing yearly to 10 euros by 2030. This fee cannot exceed more than 50 % of the total price of the product, excluding taxes (Article 2, 17, Loi 1557). The proposal also includes an amendment to the existing EPR eco-modulation scheme mandated by LOI AGECE, wherein all products affected by the EPR being subject to an environmental-performance-based modulation of prices. Depending on the environmental sustainability of a given product⁴, a penalty may thus be imposed which will then be redistributed to more sustainable companies (Article 2, 15, Loi 1557), as well as to the financing of a national collection and recycling infrastructure (Article 2, 18, Loi 1557).

The proposal also stipulates that a product receiving a penalising modulation may not also receive a bonus based on the same system (Article 2, 16, Loi 1557). Finally, the law would also introduce a small packages tax, affecting all packages weighing less than 2 kg sold by a non-European digital platform, marketplace or other similar mode of sales that is imported to a physical person in France. The tax is expected to range between 2-4 euros and to be paid by the producer (Article 8; 1, 2, 4, Loi 1557).

3.2.3 Informative instruments

Informative instruments are mainly targeted towards empowering consumers. Sellers of UFF products would be required to provide messages encouraging frugality, reuse, repair, repurposing and recycling of products, as well as provide information on both social and environmental impacts (Article 1, 8, Loi 1557:). This requirement also extends to include the environmental impacts associated with the delivery of the product to the consumer. Additionally, all online-sale platforms must provide information on where a textile or apparel was manufactured, clearly stated next to the price (Article 1, AA, 2, Loi 1557).

⁴ Criteria to be determined in future decree (Loi N° 1557).

The proposal also suggests an amendment to the Education Code to encourage critical thinking regarding modes of production and clothing consumption. Education will include learning about sustainable practices and behaviours with regards to unethical and unsustainable production methods. Simultaneously, teaching should emphasise the importance of both the individual and society for the preservation of the environment.

3.3 Expert interviews: French proposition

3.3.1 Perspectives on differences between UFF and FF

Results from the first interviews indicated that the definition of both models are highly varied depending on the respondent, as UFF was not described using the same characteristics in all interviews. However, many perceived that there is a tangible difference in volume and turnover, as CFE1 explained: *“I would say that what makes ultra-fast fashion ultra-fast fashion is like the disponibility that is unlimited to new products with a constant renewal of not even collections, it's just products, products, products”*. Other differences mentioned ranged from more intensive production and more efficient consumption incentives, or low prices, strong marketing and high technological integration like gamification as possible characteristics. The systemic issues presented by the fashion industry at large were discussed by several participants, who questioned whether there is any benefit to differentiating the two phenomena, as UFF was commonly understood as being a product of an intensified FF industry. ITE phrased it as; *“They just find a way to be more efficient in producing more and more, but with the same philosophy”*. Several interviewees also discussed protectionism as a cause of the interest in distinguishing UFF from FF, as IGK put it; *“What's new is that the money ends up in China and not in Stockholm or Madrid”*. Thus, several respondents questioned whether the need for targeting UFF arose due to its coinciding with the emergence and dominance of Asian corporations like Shein on European markets, rather than targeting unsustainable fashion overall.

3.3. Interviewee opinion on the French proposal

Four respondents had issues with both relying on a definition of UFF, arguing that the usefulness of targeting only UFF was limited. More benefits were generally associated with broader legislative efforts targeting the fashion industry. One recurring limitation is the definition either being too broad, encompassing almost all companies, or too narrow which would exclude most companies. Additionally, many respondents took issue with relying too heavily on a definition of UFF, with risks to the operationalisation of the legislation. CFE1 said:

“I think we need a scientific basis to start to really regulate ultra-fast fashion, because now we don't even know what we are talking about. People are talking about ultra-fast fashion actors, others are talking about all French fashion brands and others like fast fashion.”

Four respondents discussed protectionism as a potential contributor to this issue, as explained by ITE:

“And I think there is a real danger to just focus on ultra-fast fashion, which is what is happening in France right now, because it became the bad guys, mostly because brands selling

fast fashion are Asian, while brands selling classic traditional fast fashion are from European countries. So we pretend they're produced in Europe and that they're good for Europe, while they're basically producing in the same countries more or less. That's the same idea of having to import clothes anyway."

This view was mirrored by many other respondents, who emphasised that FF is also an unsustainable practice with significant consequences for the environment and associated with poor labour conditions.

3.3.3 Perception of interventions in the French proposal

Opinions on the potential of the separate interventions varied. Some respondents declined to comment on specific interventions, as expressed by one expert in circular fashion: *"There hasn't been any final guideline on how it will be done. So it's impossible to say how it's [the legislation] going to affect if it's done in the right way and if it's easy to understand"*. Marketing restrictions, ecomodulation and taxes were most commonly discussed by respondents who elaborated on the legislation. Controlling both marketing and advertising was generally viewed as an intervention which could have a strong impact, although the feasibility of such a regulation was not agreed on. One respondent saw no issues in implementing any of the interventions, whilst another respondent expressed doubts regarding whether a marketing ban will be implemented. The latter further explained that although marketing was important, a prohibition was viewed as too ambitious. In spite of this, a majority of respondents viewed limitation of marketing and advertising as important to both overconsumption behaviour and social welfare due to the industry's pervasive nature, as explained by ITE:

"I think what makes the power of the fashion industry is like they're everywhere, and they manage to create this fake happiness industry where you buy clothes so you feel you're happy, you feel you're pretty, you feel like you're trendy and you're a cool person. They really manage to get into your brain, not only with advertisement, with, you know, everything you see in TV shows, fast fashion weeks, not fast fashion week, but fashion weeks, fast fashion weeks as well. So that's [the marketing prohibition] definitely going to be a first step. I don't know if it will stop the process, but at least it will maybe slow it down, when you're not exposed but at least it will maybe slow it down when you're not exposed, like, I don't know, many times a day to advertisements, then maybe you slow down"

Increased understanding of fashion's sustainability issues in society, as is the aim of the amendment to the Education Code, was discussed with three respondents. However, the effect of the intervention was deemed as limited due to it being perceived as difficult to interpret and implement. Comments ranged from sustainability in itself being a difficult concept to define and teach, whilst another participant expressed doubts regarding the level of integration the suggestion would have in education. ITPE emphasised the importance of top-down enforcement for large-scale change:

"We'll never do it only on the voluntary basis, as long as it's not written on the official programs. Realistically also, school teachers are not doing great and they already have too much on their plates. So I don't have high hopes for it."

Despite this, the general trend was positive to increased awareness of fashion consumption's impacts in both adults and children.

Economic incentives and disincentives were viewed by most of the respondents as having strong possibilities of strong impacts, although the opinions on the specific instruments in the legislation varied. Ecomodulation of fees was seen as having good potential to work by two respondents. However, opinions on what the basis of modulation should be varied. One respondent viewed it as an instrument to promote ecodesign and decreasing production speed, whilst others highlighted the risks associated with the interpretation of environmental performance or the lack of precedence in the sector. With regards to the import tax, controlling and limiting import was generally more positively viewed than the specific tax. The latter was connected to production moving rather than a decrease in production by two respondents, both of whom cited Shein moving production to Poland as an example.

3.3.4 Percieved limitations of the legislation

A common theme in several interviews was the risk of circumvention in relation to the different interventions suggested in the proposal. Respondents suggested that companies will continue to find ways to avoid the requirements and prohibitions of the legislation, as explained by EEP: *“Every rule you apply creates strong incentives to circumvent”*. CFE1 also raised the question of enforcement, saying: *“Now we have a new proposed law that creates new rules and we're not sure we can force actors to apply it.”* Issues related to limiting the policy target to UFF was also discussed, with potential risks identified as companies either reframing activities to fall outside its scope, or lobbying to change the definition or strictness of the legislation. Other loopholes discussed were for example companies finding alternative ways of communicating with consumers, avoiding specific wordings (such as free), or importing to a non-member state in Europe to avoid import taxes. ITE also mentioned rumours of creating separate Producer Responsibility Organisation (PRO)s:

“Cause obviously if Shein, for instance, stop contributing to REfashion [Responsible organisation for EPR of clothing, textiles and shoes in France⁵], REfashion is losing a lot of budget, since Shein is putting a lot of new products on the market, they are paying equal contribution a lot. “

3.3.4.1 Barriers

Discussions on potential barriers for the legislation's implementation centered around two themes, which indicated that geopolitics and EU harmonisation could affect the legislation's definition and interventions. The current geopolitical climate's effect on the proposal was mentioned by two respondents, mainly due to the legislation being seen as mostly affecting non-European companies. As such, the two interviewees mentioned that there could be unwillingness at both EU and national levels to adopt the legislation due to fears of political and economic repercussions.

EU harmonisation was seen as both a barrier and a facilitator in the implementation of the legislation. Some interviewees indicated that the interventions suggested by the legislation have little potential of affecting the overall industry without EU harmonisation, as the latter would affect more

⁵ (REfashion, n.d.)

markets and thus have larger effect. However, implementing the legislation before a wider harmonization was also seen as potentially hampered by the methodology associated with the eco-modulation, mentioned by two of the respondents. One risk was described as relating to inefficiency as implementation may mean having to rework the system following wider adoption. Furthermore, the requirement of harmonization of EU and national legislation was seen as a potential barrier, with both respondents' citing non-compliance with the Digital Service Act (DSA) as well as the Union's free market rights, and one respondent claiming general resistance in the EU as a risk. CFE1 said, regarding import taxes: *"And it was a good idea and a good thing, but still, we know now that Shein is building factories in Poland"*. Although the respondent emphasised that this could create jobs, they further criticised that it could come at the expense of not truly addressing the circularity and sustainability issues of the sector.

3.3.4.2 Policy gaps

Despite these limitations, most respondents throughout all interviews saw the legislation as a first step to broader legislative action addressing the environmental consequences and social injustices of the textile industry, independent of their own knowledge on the proposal. However, without addressing the systemic drivers of the economic model, limited change is expected, as expressed by CFE2:

"The governments have to make their budgets not based on GDPs. If your budget is based on a GDP, which is growing, then the company will follow those steps. So it's a whole system. Of course, you can weed out some ultra-fast fashion companies here and there, you can weed out the worst, but you're not removing the main problem from which this is arising."

In some interviews, a theme of understanding society as path-dependent or locked-in was identified. Several respondents described individuals and companies as trapped in a loop of overconsumption and overproduction. This theme was discussed in relation to both the French proposition and the EU's suggested ESPR, as put by CFE1.

"I think we're in a society in which the goal is to consume more and to have the most things possible. And people are trapped in this system in a way, we have to make them [people] responsible for the action, but still the companies, they also have to be responsible in the way they communicate, the aesthetic they communicate, the fact that it's desirable to always buy new things is not a good thing."

As a result, IGK and CFE2 mentioned that the current consumption behaviour must be addressed to affect systemic change, as people will otherwise spend their money on other products or services with their own impacts.

Three respondents also questioned the focus on physical durability, calling for increased focus on emotional durability and the soft values of fashion to be included in future policy. Several respondents viewed this as a limitation of some of the interventions, as explained by IGK: *"If you increase the duration of use for a garment, for example through reparation, that does not mean you consume less nor that you necessarily use that garment more. If you use that garment more, you use another less"*.

Another respondent questioned the effectiveness of ecodesign criteria by saying “[...] *will I buy something which does not look good on me but has a lower carbon, I mean, environmental footprint?*”. However, FTE saw potential in increasing physical durability both in terms of increasing willingness to pay for quality garments, but also for strengthening the circularity of the industry.

On top of the previously described policy gaps, respondents also suggested ideas which were mainly focused on upstream production such as: ensuring labour rights, restricting chemical use, and facilitating access to repairs and spare parts. Restrictions and transparency on materials was also discussed with two respondents.

3.4 Expert interviews: European policy

This section presents the results of the second round of interviews, in which respondents were asked to present their opinion on the interventions proposed above in table 5, if introduced on an EU-level. Subsidies were excluded from the results due to space constraints.

3.4.1 Perspectives on differences between UFF and FF

Respondents’ views on what the difference was between the two, and whether this was useful, was inconsistent across the interviews. The most common characteristic assigned to UFF was a high-volume output, contributing to the understanding of UFF as a more intensive and exploitative version of FF. However, PE1 discussed the limitations of relying on this definition

“The big problem with the fashion industry is that we don't know the volumes that brands are producing. And therefore, it becomes very hard to really assess the impacts on a clear scale of whether Zara versus Shein is contributing more in terms of environmental impact.”

EEF indicated that this delineation may be more dependent on how established a brand or company is, explaining: *“They could possibly have somewhat narrower collections, but at the same time Zara releases an absurd amount of garments each month, so the question is how much their environmental impact really differs”*.

The use of dark patterns was also a recurring theme across the interviews. Dark patterns describe ‘manipulative tactics’ which incites consumption through stress and information presentation, linked by some research to overconsumption behaviours (Koh & Seah, 2023). When applied to social media and e-commerce marketplaces, the tactics were understood by several respondents as having impacted the development and success of UFF and the fashion industry overall, as explained by PE1:

“[...] they become more personal, they can find you everywhere, you're sitting in your room, just not concerned about fashion at all, and then suddenly it appears. And this creates this artificial urge and need to do things that you would never have thought about doing.”

Whilst FIE described the theme as:

“It's more similar to manipulation or something in the way those customer journeys are designed compared to those of a regular Fast fashion customer journey. There is something in it that is very,

very powerful [...] It's difficult to demarcate the difference when fast fashion also uses social media, but there is something in the algorithm that controls social media and the logic in these systems that makes it more powerful."

The remaining characteristics were less common across all interviewees. Some descriptions from interviewees included a high reliance on synthetic materials, and gamification. One respondent also identified the use of air freight as having allowed the evolution of UFF, suggesting that this could be an additional criterion on which characterisation could be based.

Another common theme across several interviews was the influence of protectionism and the current geopolitical climate possibly influencing the demand for delineation, as explained by ITPE:

"The focus on Shein and Temu being the bad guys fits nicely into a geopolitical pitting everybody against China. There is a lot to be said about Shein and Temu being absolute garbage. And I think it's very important to tackle the fact that Shein is massively exporting directly to consumers' doors. And there absolutely needs to be action on this. That being said, there also needs to be action taken on European fast fashion brands. And some people that I work with, therefore, don't find it useful to distinguish between fast fashion and ultra-fast fashion, because they say it's actually just a way to say one is worse than the other. Like we'll tackle the worst one first, the Ultra-Fast Fashion."

3.4.2 Targeted policy or systemic change?

Although UFF was described as a good start for policy intervention, all interviewees took issue with not extending policy to encompass the entire fashion sector. The general theme across all interviews was uncertainty and misalignment of opinion between the interviewees' opinions of the interventions. None of the suggested interventions was unanimously agreed to be useful, and all were suggested to be redirected using different methods or targets.

As previously mentioned, limiting policy attention to UFF was critiqued, perceived as limiting interventions' effectiveness and applicability. Some interviewees suggested that UFF may be a strategic starting point, although given the lack of an exhaustive delineation of UFF from FF implementation potential was viewed as difficult. As put by PE2: *"If you want to get legislation passed, then maybe just focusing on ultra-fast fashion initially can be strategic. If you want to address environmental and social outcomes, only focusing on ultra-fast fashion isn't going to change the situation"*. They continued by saying:

"What's interesting to me is the idea that fast fashion brands, if they could, will not just continue to morph into fresh fashion brands. Like, why would they stop? If there's money to be made, why on earth would they not?"

Respondents further agreed that the current proposals are not sufficient to address the root causes, often described as overproduction and the resultant overconsumption, which in turn would limit the extent to which policy can mitigate the environmental and social impacts of the sector. As one respondent described the limitations of the current policy landscape: *"So it's not radical change, but it's codifying what is already partially happening. That will therefore, by definition, not bring systemic*

change because it's already codifying what some parts of the sector are already doing". Thus, many respondents argued that systemic or norm change is necessary, as put by PE1:

The problem is kind of systemic and it does not affect only the fashion industry, but mainly the fashion industry. [...] There is a lot of room to regulate products, to regulate processes, to regulate companies. But we cannot regulate the freedom of consumers to decide what they want to decide. And by leaving this little window open, it means that a lot of the practices that are used by the ultra-fast fashion just fall under the radar because it comes to the area of advertising, offering some, let's say, perceived benefits to the consumer because it's cheaper, it's faster, and people that, you know, they don't have a high purchasing power, they really turn to these companies just for their basic needs and not because of fashion.

This was further explained by EEF: "It's part of our culture, and then you would have to change society in some way."

3.4.3 Opinion on proposed interventions

Below follows a compilation of interviewee responses by suggested intervention (see chapter 2.2.1.3) as interviewees discussed the interventions to different extents.

3.4.2.1 Product destruction

The risk of unintended or unforeseen consequences was central to the discussion of the product destruction prohibition in ESPR. A recurring example was the impact on the second-hand sector, discussed by two respondents. PE2 said:

We now see the reuse sector collapsing because they can't make value off the low-quality products.. [...] unless it's [the ban] truly enforced and truly affects upstream decisions and makes brands produce less, if that is what it does it would be effective. But I don't think in the current setup, that's what it's achieving.

This sentiment was echoed by EEF, who pointed out that this does not affect the issue of overconsumption, rather it contributes to further consumption by providing garments at even lower prices. PE1 disagreed with this view, seeing potential of mitigating overproduction by contributing to an improved market planning by companies due to an influx of their own products at an even lower price, saying "potentially they will lose a market share from the second hand items that will have to be donated".

3.4.3.2 Marketing regulation

A majority of respondents were positive to marketing regulation of UFF and fashion in general, although the suggestion received similar questions regarding how it would be put into effect. As the issue was described by EEF: "You shouldn't be able to see something on Tiktok and have bought in like 30 seconds, there should be some barriers [...] everything today is so frictionless, it is so easy to buy something you can almost accidentally do it". Thus, most respondents agreed that policy addressing both marketing and marketing through social media could contribute to disincentivising consumption,

as the interaction between e-commerce and social media was seen as incentivising and facilitating consumption. However, PE1 indicated that political willingness of regulating marketing may be limited due to its connection to the freedom of consumer choice, saying:

And by leaving this little window open, it means that a lot of the practices that are used by the ultra-fast fashion just fall under the radar because it comes to the area of advertising, offering some, let's say, perceived benefits to the consumer because it's cheaper, it's faster, and people that, you know, they don't have a high, let's say, purchasing power, they really turn to these companies just for their, you know, basic needs and not because of fashion, let's say. So in that sense, this area is very sensitive and it cannot be regulated very much.

However, some respondents also identified social media as a potential target of regulation, as it was understood as facilitating and incentivising consumption by exposing consumers to advertisements and ease of access to products. As such, EEF suggested that companies should be banned from sales through links, or sales directly in the social media apps to increase consumer friction.

3.4.3.3 Ecomodulation

Regarding the ecomodulation scheme, three respondents highlighted that although the ecomodulation scheme could be a powerful tool, its effect also dependent to its formulation as explained by AZ: “it could become a fee paid by producers to continue with business as usual [...], it could make the products more expensive for the consumers without affecting real change in the system”. Some limitations to the scheme were also identified related to the possible LCA-basis of evaluation, as one respondent saw risks of promoting synthetic materials, and another seeing limited possibilities for the inclusion of soft values like durability and reuse due to their limited measurability. Two respondents thus suggested that volume of produced references as an alternative measurement for eco-modulation, or as a form of tax basis.

3.4.3.4 Ecodesign criteria

The risk of loopholes was also discussed in relation to the Ecodesign criteria, although opinions on which suggested criteria was most at risk varied. One interviewee argued that increased durability requirements may contribute to longer production time and less agility, and whilst another mentioned that this may bias in favour of synthetics: “in a lot of EU kind of approved methodologies, synthetics are being weighted as better for the environment without at all acknowledging the role they've played in this kind of explosion in volumes”. Two of the respondents viewed requirements of percentage of recycled materials as possibly incentivising fibre-to-fibre recycling. However, this view was contended by the other three respondents who emphasised that depending on the formulation of the intervention, this could also result in a higher percentage of recycled polyester from non-textile sources rather than increasing the fashion sector's circularity. As the issue in the current ESPR proposal was explained by ITPE:

“The proposal so far is to include PET bottles and non-textile feedstock. [...] There are literally factories in China that produce plastic bottles so that they can then be recycled afterwards directly

and used as recycled fibers. And therefore, well, if recycled fibers allow non-textile feedstock, then yeah, that's not going to change much. It's literally how the sector is already working."

Additionally, overproduction and overconsumption were often considered to be connected to the concept of emotional or extrinsic durability and the lack of research equating higher durability with lower environmental impacts or longer time of use. Several respondents emphasised that improving design and repairability through the Ecodesign directive may not have the intended effects of higher durability as it does not necessarily mean longer time of use at an end consumer. However, TCIE disagreed with this, saying:

"One thing that destroys emotional durability is poor quality. [...]. What I mean is that in some way, it could be putting higher requirements on the product's performance, like getting emotional durability by demanding higher quality requirements. That it kind of comes as a little bit of a bonus at least."

This issue was also discussed as responsible for the lack of incentives to produce products with longer lifespans and sufficiency in the sector by two other respondents respectively. Interviewees thus suggested introducing policy action to make overproduction economically unviable to transition from the current paradigm.

3.4.3.5 DPP

The suggestion of DPP was discussed with three participants, one of whom was more positive than the other two, seeing potential for companies to be more transparent. Increased data knowledge among companies was also perceived by the respondent as positive for the development of environmental product declarations, providing data for ecomodulation schemes, and supporting alternative business models. In contrast, EEF saw limited potential of the DPP affecting changes in modes of production or prices, whilst PE1 expressed doubts regarding its value compared to the resources it would require. However, PE1 was also positive to increased data collection for EPR schemes, although they expressed doubts regarding its impact on the individual.

3.4.3.6 Labelling

Similarly to the DPP, geographic origin labelling received both positive and negative responses with the four people that expanded on the suggestion. PE1 saw more potential in including social and environmental impact labelling, whilst PE2 was uncertain as to what the information would result in without associating it with some other instrument such as ecomodulation. On the other hand, AK was very positive to the policy, suggesting it may be important for both customers and enforcement:

Let's say if a brand claims that like we have more sustainable fibers, we actually source organic and we have less water that we use and we also don't use pesticides and we have super cool solar powered trucks that deliver them, that is a claim that needs to be backed.

EEF was similarly positive to increased transparency in companies but also saw limited potential of limiting consumption. Rather, they perceived increased transparency requirements as potentially increasing consumption if companies were perceived as more trustworthy.

3.4.3.7 Import tax

The suggestion of import tax was elaborated on with the two policy experts, one of whom was positive to internalising the externalities of deliveries, whilst PE2 saw risks of unintended effects related to consumer response. PE2 further elaborated: “And as we say, three to five euros. It's not a lot. [...] I mean, yeah, if this is just the de minimis' rule, I think just close it down”.

3.4.4 Policy gaps and suggestions

3.4.4.1 Producers or consumers?

The impact of low prices on both consumer and producer behaviour was mentioned by several respondents and described as the result of cheap labour and other resources, especially the availability of synthetics. The impact of cheap resources, and its connection to overproduction, was described by PE2:

“So they do manufacture with lower and lower and lower costs. And they always have a profit margin. So the incentive there is to produce more, rather than to produce less but higher quality. Because repetitive sales, [it's] the ones that bring profit. “

Other respondents argued relying on consumers to change their habits is not very effective, as EEF said: “It's part of our culture, and then you would have to change society in some way”. Another limitation of consumer policy was, as previously mentioned discussed in relation to marketing (3.4.22), explained by PE1:

“I mean, usually politicians do not touch this area because it can have some potentially beneficial effects when it comes to sustainability and reducing impacts in the environment. But it can have some effects more on the economy of the system and maybe some other socioeconomic effects that relates to the bottom, let's say, purchasing power group of people. So yeah, it has always been very sensitive. People don't want to avoid, to regulate it and all politicians, you know, they just skip it. It's like if people want it, we cannot change it. But we can put some incentives around it. Okay, maybe make it a little bit more expensive here and there with some tax, some fee, but not really regulate, you know, just ban like the ads or reduce the marketing or something like that. This is very new and very innovative approaches.”

A general understanding among all respondents was that policy should mainly target the brands or producers of UFF or fashion in general, and consumers to a more limited extent. Explanations for this varied from overconsumption being a result of overproduction, to the limitations of relying on consumers making the more sustainable choice, as ITPE put it:

“Usually people would say like, oh, consumers don't really care about sustainability or labour rights. They care about quality and price, but I don't think that quality and price are at par. So having criteria on material quality is something that theoretically should already be one of the determining factors that the market should take care of”

3.4.4.2 Resource and volume regulation

Several interviewees discussed what can be described as a lack of internalisation of externalities in the current system, which allows for the agility and low prices of the produced garments. One example was related to the reliance of LCA's for evaluation of environmental performance, described as at risk of favouring polyester and other synthetic fabrics. One respondent explained: *"Potentially we see this situation where, on a lot of EU kind of approved methodologies, synthetics are being weighted as better for the environment without at all acknowledging the role they've played in this kind of explosion in volumes"* This view was supported by another participant, who connected the presence of synthetics to the low prices of UFF: *"It has to cost more, it has to be taxed more so that this phenomenon for ultra cheap clothing doesn't exist anymore"*.

3.4.4.3 Deliveries

Another issue which was described as underexplored and receiving limited policy attention was the deliveries. The current fashion system was generally described as unsustainable as such, including the second-hand sector. Some respondents provided suggestions like a ban on air freight overall, or internalisation of delivery in product prices as explained by PE1: *"I strongly agree that the fee on e-commerce packages, no matter what is the origin of the material, it should be placed there because the whole impact of the logistical system is not accounted very well."*

3.4.4.4 Unfair labour and trade

Aside from the issues of synthetics, several respondents also emphasised the effect of cheap, available, and agile labour on the price and success of UFF, as previously mentioned described as a significant policy gap. ITPE explained the issue from a supplier's perspective:

"We've just got it in an order request that we're supposed to produce limited edition Valentine's Day t-shirts by tomorrow. Well, then everybody has to do overtime. And then everybody needs to just make that happen regardless of whether there is the budget for that, whether that would allow for the payment of living wages that have been negotiated with trade unions, and regardless of whether it is 50 degrees hot in the factory."

However, legislative action was also perceived as difficult due to the globalisation of the supply chain, as explained by PE1: *"A lot of these are happening in centers around the world that are not very regulated. And, you know, the supply chains of the big firms are kind of obscure, they're kind of lost."* Although PE2 agreed with this when questioned, they also said: *"I do think that is a convenient excuse because we see that brands are much less concerned with people's livelihoods and jobs when they need to be, when it makes business sense."* Policy suggestions ranged from including requirements of transparency and enforcement of working wages to limited hours of work. To facilitate such monitoring, one respondent mentioned the success of the EU Act on Prohibition of Unfair Trading Practices in agriculture, suggesting that similar legislative action could work in the textile sector as well.

4. Discussion

4.1 Determining characteristics of UFF

The purpose of characterisation of UFF was to identify what the key characteristics of the business model were. This was done to separate it from the existing FF business model, given the study's overall aim of identifying policies relevant to UFF. The results of both the document analysis and the interviews indicate that UFF and FF may be differentiable based on some characteristics like speed of production and volume of references produced.

The analysis of the online documents and the descriptions of previous scientific studies suggest correlations with the findings of the interviews in that there is an understanding of some difference between the two business models. Based on the results of this study, UFF can be characterised as a business model whose production is agile and even faster than FF, allowing for high turnover in products but also contributing to a high social and environmental burden. Products are available at very low prices and mainly sold through e-commerce marketplaces. By high technological integration and social media presence in the form of e.g. advertising and influencer collaborations, companies adapt marketing strategies to the individual consumer through data analytics. Combined with the mainly e-commerce-based mode of sales and low prices of UFF products, the model incites overconsumption behaviours in its intended consumer base. This suggests that UFF can be understood as a more intensive version of FF given its descriptions of faster production and high technological integration.

This characterisation somewhat aligns with those provided by interviewees, although the main recurring themes in the interviews were volumes and the use of dark patterns and technology in e-commerce and marketing practices, with less agreement on other characteristics. Volumes were mentioned as possible measurements to identify the worst performers of the industry, as well as potential eco-modulation basis in this study, aligning with suggestions by Eunomia (2022). Dark patterns have previously been identified as a core strategy of Shein by the The European Consumer Organisation (2022) and commonly used as an example of UFF companies by both documents and interviewees.

However, the results also suggest that there are limited possibilities to differentiate the two business models based on current knowledge, as the analysed data suggests that use of the two concepts overlaps. Respondents raised concerns that geopolitical tensions and protectionism may have influenced the current discourse surrounding UFF, particularly given the non-European origins of the companies most associated with the model. Whilst this study cannot verify such claims due to the lack of previous research on this subject, it highlights the need for further research on the subject, and that qualitative research be combined with quantitative data to avoid the influence of bias. The study thus suggests that though there might be some differences between FF and UFF, there is not sufficient evidence to provide a basis for UFF as a regulatory target.

4.2 Current policy restriction of UFF

The second research question aimed to explore and contribute to the understanding of current legislative action on UFF. Current legislative action, both directly targeting UFF such as the French

proposal, if implemented, and the policy actions planned by the EU could have effects on UFF. However, these are also emergent policies, which may explain the general theme of risk of circumvention mentioned across many of the interviews as well as the lack of previous research to compare this study's results with.

Respondents highlight risks of narrow focus emphasised by the uncertain definition of UFF, as this study shows there is a lack of both the lack of a rigorous definition of what sets UFF apart from FF, and that the issues are present across the fashion industry. These limitations indicate that there may be limited possibilities of meaningful implementation of UFF specific policy.

The results of both rounds of interviews indicate that the effects of both the EU's policy actions and those of the French proposal are difficult to determine. Additionally, a common theme across both rounds of interviews was that limiting policy to UFF would also limit the effect of the policy, as the issues were generally described as systemic and common to the entire fashion sector. Despite this, the suggested interventions, and those of the French proposal, were generally understood as conceptually promising but constrained by the risk of circumvention such as companies reframing activities to avoid being classified as UFF.

The risk of circumvention and loopholes in current policy suggestions align with the findings of Solis et al. (2025), whose results indicated that one core limitation is the risk of loopholes and fraud in relation to textile policy in the EU. Solis et al. (2025) thus suggest that policy should, among other things, be developed in tandem with stakeholder engagement. However, as the results of the first round of interviews indicated that lobbying may have a strong impact on the final formulation of the legislation, this may also contribute to further development of unintended effects. The results also indicate that there is some overlap in the characterisation of UFF and the formulation of the French proposal, as both have indications of influences from protectionism and geopolitical tension. Although these issues are like what was previously discussed, cannot be verified by this study. However, the presence of this perception emphasises that there is a risk of bias which must be considered when evaluating UFF and related policy.

Another common theme was the suggestion that policy should be focused on a broader scale to encourage and enforce systemic change in consumption and production behaviours in the EU, aligning with the findings of the Mörsen's (2023) report for Zerowaste Europe on sufficiency in the textile sector. To change the current culture of overconsumption, some respondents supported the role of education in changing consumers and producers' perception of clothing, which suggests that the amendment of the French Education Code⁶ as suggested in the French proposal may be beneficial if implemented strategically. More benefits may thus be associated with exnovation of the undesirable characteristics contributing to unsustainable practices in the industry to facilitate systemic change. To change the current culture of overconsumption, some respondents also supported the role of education in changing consumer behaviour, which suggests that the amendment of the Education Code could be beneficial. However, the study's results also indicate that policy for exnovation of UFF may be a strategic stepping stone to facilitate broader legislation across the sector, provided that legislative action is not limited to UFF. This becomes of especial importance as one general indication of this study is that UFF presents as an intensified form of FF, meaning that FF companies, and indeed other businesses as well, may adopt similar practices to those of UFF. If legislation is thus limited to UFF companies as

⁶ Reference document uniting all Education legislation in France (Eurydice, 2023)

they are understood today, policy risks removing the dominant players from the fashion sector only to allow the development of European UFF brands exempt from legislative efforts.

4.3 What aspects and gaps must policy address?

As previously discussed, some benefits may be gained from initiating exnovation policies for UFF; however, the results also indicate that phasing out unsustainable practices cannot stop at UFF but must be applied more broadly to the fashion sector at large. The empirical data collected in this study suggests that there are several policy gaps existing in the current approaches to regulation of the textile industry in general. Combined with the perceived limited efficacy of exnovating UFF, policy should thus target the systemic issues of the fashion industry more broadly.

To combat this development, the results of this study suggest that policy should focus on targeting specific characteristics prevalent throughout the system, such as high production volumes, high environmental impacts, poor labour regulation and aggressive marketing or advertising strategies. However, given that the Apparel Impact Institute's (2025) notes a correlation of UFF's appearance with higher emissions from the sector, its impacts should not be dismissed. Some benefits may thus be achieved from limiting policy to targeting UFF. However, it should act as a point of entry to broader strategic action on textile and fashion sufficiency rather than a panacea to the sector's impacts.

Based on these findings, this study suggests that to provide a comprehensive understanding of the differences between UFF and FF, increased transparency of the sector is needed to allow future research using measurable quantities to define business models based on e.g. volumes, rather than qualitative characteristics dependent on the individual's biases and understanding. As such, it may be more beneficial to target the individual characteristics associated with unsustainable practices in fashion as well as overproduction and overconsumption, as will result in targeting companies no matter if they align with the definition or not.

Systemic change was also discussed in relation to the individual consumers. The results indicate that the current culture supports the lack of emotional attachment to clothing, influencing the duration of use at the end-consumer in all fashion. As such, policy must attempt to curb both the tendencies of the fashion industry to incite overconsumption behaviours in consumers, as well as limiting the agility and ability of producers to continuously put new product references on the market. Both the interviews and previous literature (e.g. Niinimäki et al., 2020) suggests that physical durability improvement may not be enough to combat the systemic drivers of fashion consumption, meaning that policy must also attempt to change the emotional durability of apparel. The findings of this study suggest that this might be attempted through the adoption of policy aiming to change the way in which consumers connect with their apparel, as well as enforce limits to the production volumes and consumption incentives of fashion businesses.

Furthermore, the interviews suggest that policy should attempt to target the produced volumes as both a method of delineating the worst performers of the sector, as well as a target for overall policy intervention to limit production and waste. Increasing transparency and illuminating the volumes and resources produced by the sector may also support the development of criteria for determining which producers are UFF or FF, as it could provide quantitative data to support the qualitative descriptors identified in this study. Targeting synthetics through economic policy instruments was also discussed as a possibility by several respondents, as this was described as

contributing to the low prices and high volumes produced. Increasing the price of material could have implications for the prices of the final products, as well as decrease the environmental impacts of the sector as Niinimäki et al. (2020) suggest that the use of synthetics is strongly contributing to the industry's carbon footprint. These suggestions mirror those made in policy briefs by Mörsen (2023) and the HCI (2026), wherein limitations on use of synthetics and resources are described as key to sufficiency in fashion.

Several respondents also suggested that the agility and low price of fashion including UFF is a result of unethical labour practices. As such, enforcing ethical labour was suggested as a possible policy target to slow down production and increase prices. By increasing prices and decreasing rate of turnover, this could also have an impact on the consumption of individual consumers, one expert suggested that the ease of access and low prices result in unintended overconsumption.

A common theme across all interviews was whether there is any benefit in simply targeting UFF, rather than an overall improvement of the entire sector as the issues were identified as systemic. This suggests that there common drivers which are allowing the success both UFF and FF. As such, the results of this study suggested that the most beneficial approach may be to apply overall restrictions on fashion production and consumption. However, it may also be necessary to apply exnovation as a form of choice editing to allow consumption to move to more sustainable brands and patterns, as relying on innovation has been described by some researchers as a bias preventing the development of more sustainable societies (e.g. Heyen et al., 2017).

Although the policy suggestions of this thesis are not exhaustive, the results indicate that the EU should focus on enforcing fair wages and working conditions in the textile sector, as this has the potential of both slowing production as well as increasing prices of products. Additionally, the EU should regulate the use of resources to limit the use of synthetic fibres through introducing resource targets and caps, as well as working for the removal of fossil subsidies considering its contributions to the volumes and success of both UFF and FF according to the interviewees. However, similarly to the previous two discussion sections, this study's results require further research to determine its validity.

4.4 Methodological reflection

The brevity of previous research on UFF, as well as the emergent nature of textile policy in the EU means that much of the study's results are focused on the empirical data from the conducted interviews and analysis of searched online content rather than previous research. As such, the considered policy instruments and interventions are not exhaustive. Additionally, the study is conducted as a master's thesis, meaning that there are temporal constraints which must be considered, motivating the inclusion of only EU-level policy mixes, as opposed to global mixes. This means that the potential for exnovation of the practice is only explored in a European context, excluding many of the other countries which are experiencing detrimental effects due to the consumption of UFF products.

The interview method could have been improved by moving towards more of a structured interview, limit response time per question or sending the chosen interventions beforehand to respondents. These could potentially increase the response rate to some of the proposed interventions, which by some respondents were not elaborated on due to time constraints. However, this also allowed a deeper understanding of the interventions that the respondents chose to elaborate on, which can be useful given the participants' different expertises and experiences which can affect what they can or are

willing to elaborate on. The current selection of participants represents experts from policy research, textile research, and international fair labour associations which could affect the results of the thesis, as they may be biased in their opinion on UFF. An additional benefit to future research could be the inclusion of participants from the industry, as this could further nuance the understanding of UFF as a concept. However, as the purpose of this study was to evaluate the possibilities of phasing out UFF companies, industry participants may also provide data which is in direct opposition to the purpose of the study, especially given that e.g. Shein has opposed its description as a UFF, and that other European FF brands may have biases resulting from economic losses or gains as a result of UFF. Future studies must thus be aware of this issue if including such respondents.

Many of the documents which were analysed in connection to the case study of the proposed French proposition were only available in French. Thus, the interpretation of the documents was subject to the reliability of the author's and translation methods's interpretation of the contents therein.

Furthermore, previous research is rarely focused on UFF as a concept but rather explores behaviours or business strategies related to UFF without clearly defining the model. This meant that there was limited variability in the descriptions provided in the identified articles, with definitions generally being sourced from a single or small number of non-peer-reviewed sources. Additionally, several of the sources are focused on Shein as a case study rather than UFF as a phenomenon, which may have affected the included characteristics. However, as the available literature on UFF was limited, this was deemed an indicative characteristic of how UFF is perceived, rather than a data limitation.

4.5 Future research

Exploratory research is by its nature in need of additional research due to the lack of previous knowledge on the subject. As such, future research is needed to determine the validity of this study's result, as well as contribute to further knowledge generation on the subject. As the fashion industry is considered to be unsustainable in general, this becomes especially relevant given that the results of this study indicate that there may be limited benefits resulting from the differentiation of UFF and FF. Future research should instead be more broadly focused identifying and targeting the unwanted characteristics of the fashion industry at large using policy. However, as several respondents also indicated that UFF may be a strategic starting point of policy attention, research could also attempt quantitative characterisation to determine whether there are any numerical differences in measurable characteristics like volumes produced, environmental impacts or labour concerns. Furthermore, it could also be of interest to learn from products which are currently strongly regulated, such as tobacco and alcohol in order to explore and adapt current textile policy to phase out unwanted practices.

5. Conclusion

This thesis contributes with findings to a relatively unexplored field of UFF research, as well as an emerging policy landscape. The results indicate that even though there are characteristics that can be especially specific for UFF, they are often relevant also for the fashion industry more broadly. As such it is not possible, based on the results of this study, to say whether there is a significant difference between FF and UFF. The results therefore indicate that UFF could be the epitome of the industry's impacts, whilst simultaneously presenting as a symptom of the overall issues in the sector. However, further research on the quantitative differences will be necessary to determine the extent to which the two models differ.

Current textile policy in the EU is largely emerging and with exception of the French proposal is not specifically targeting UFF, nor are there any significant policies fully in place regarding textiles overall. Due to the systemic nature of the issues related to the impacts of the fashion industry, the results also indicate that the current policies will have limited effect, as they fail to address the root causes of the impacts of the industry.

Thus, this study indicates that exnovation must target the unsustainable characteristics of the entire fashion industry, rather than target individual business models to affect systemic change of the way society produces and consumes apparel. This will require addressing the lack of emotional durability in clothing, as well as the overproduction and overconsumption prevalent in society today, as well as additional policy to fill the gaps identified in this study. These were mainly related to a lack of regulation in produced volumes, a lack of enforcement of ethical labour conditions, and failure to regulate the overconsumption of resources prevalent in fashion today.

In conclusion, this study indicates that targeting UFF in isolation will have limited effect on the overall environmental and social consequences of fashion production, as the issues are prevalent throughout the sector. Stronger effect is likely to occur if policy targets the unwanted characteristics in general, rather than constrained to UFF.

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Appendix A: Consent form, English

Exnovation of ultra-fast fashion in the European union

CONSENT FORM

Information about participation

We would like to ask whether you wish to participate in a research project. In this document, you will find information about the project and what participation entails.

What is the project about and why are we asking you to participate?

Exnovation (termination) of ultra-fast fashion in the European union is part of the research project *Exnovation for a sufficiency-oriented circular economy*. The project aims to explore the possibilities of using exnovation of unsustainable consumption- and production models to reach a sufficiency-oriented circular economy. Ultra-fast fashion presents as an extreme version of linear business practices through intensive resource consumption, short duration of use, and low prices. As such, it is inherently incompatible with sustainable societies, making the elimination of such practices of interest for the transition to a circular economy.

Currently, there is no clear legal or scientific definition of Ultra-fast fashion. One of the objectives of this master's thesis is therefore to develop such a definition whilst simultaneously identifying possible policies for its exnovation. This is complemented by a focused case study of the French legislative proposal aimed at minimising the presence of ultra-fast fashion on French markets.

The research principal for the project is Lund University. The research principal is the organisation responsible for the project.

As part of this project, we invite you to participate in interviews:

We seek to learn more about:

- how businesses experiment with low-, zero-, or post-growth aspirations and alternative value logics;
- how profit, ownership, governance structures, and resource use are redefined in these contexts;
- perceived sustainability impacts and trade-offs of emerging post-growth business models;
- institutional drivers, barriers, risks, and enabling conditions for business transformation;
- policy frameworks and governance innovations aligned with wellbeing-oriented economies.

You will be interviewed by a Master's student.

How will the project be conducted?

You are invited to share your understanding of the phenomenon with the aim of formulating a definition of the business model. Additionally, you will be asked about your opinions and understanding of the legislative proposal in France, and what potential policy interventions could be of interest to remove Ultra-fast fashion from the European market.

The interview will take approximately 45 minutes.

You decide which experiences you wish to share and what you prefer not to discuss.

The interview may be audio-recorded with your consent.

What will happen to your data?

The project will collect and register information about you. Your responses and results will be processed in a way that prevents unauthorised access.

Research data will be archived and deleted in accordance with the research principal's rules on the preservation and disposal of research documents, in line with the General Data Protection Regulation (GDPR), the Archives Act (SFS 1990:782), the Archives Ordinance (SFS 1991:446), and the Public Access to Information and Secrecy Act (SFS 2009:400). Data will be handled in accordance with existing routines at Lund University, including data management plans. Lund University is the data controller.

Personal data, including name and contact details, is processed as necessary to conduct research in the public interest (GDPR Article 6(1)(e)) and handled in accordance with the GDPR. Only pseudonymised data will be shared in publications or public presentations related to the project.

As long as you can be identified, you have the right to know which personal data we store about you, to receive a copy of your personal data, and to request correction or deletion of your data. Personal data is collected when you participate in an interview as part of our research. These data include your name, contact details, and, if deemed relevant, your workplace.

If you wish to access your data, please contact the principal investigator. The Data Protection Officer can be reached at dataskyddsbud@lu.se

If you are dissatisfied with how your personal data is handled, you have the right to lodge a complaint with the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten), which is the supervisory authority.

Are there potential consequences or risks of participating?

The potential risk identified concerns data breaches and the dissemination of personal data, though it is very small. To prevent this, we apply the principles described above along with additional safeguards. Beyond this, we see no risks associated with participation. Only pseudonymised data will be shared when reporting results, for example, in scientific publications. You will not be pressured to answer questions or discuss topics you do not wish to address. You may always decline to answer a question.

Participation is voluntary

Your participation is voluntary, and you may withdraw at any time. If you choose not to participate or to withdraw, you do not need to provide a reason. If you wish to withdraw, please contact the person responsible for the project (see below).

How will you receive information about the results?

We intend to use information from the interview when writing public reports and articles. If you would like a copy of our publications, please contact Carl Dalhammar (carl.dalhammar@iiiee.lu.se).

Responsible for the project

The project is led by: professor Carl Dalhammar

The International Institute for Industrial Environmental Economics, Lund University

PO Box 196, 22100 Lund, Sweden; www.iiiee.lu.se, carl.dalhammar@iiiee.lu.se +46 70 296 03 62

Exnovation of Ultra-fast fashion in the European Union

☐	I have received and reviewed the information about the study and have had the opportunity to ask questions. I understand that I may ask additional questions at any time.
☐	I understand that I may withdraw from the study at any time. If so, I should contact Professor Carl Dalhammar (carl.dalhammar@iiee.lu.se). If I withdraw, I understand that information about my participation will be retained, although my responses will be deleted.
☐	I understand that I may end my participation at any time and/or decline to answer a question without this affecting my participation.
☐	I understand that the information collected will be kept confidential and handled in accordance with GDPR.
☐	I understand that my personal information, such as my name, will not be shared outside the research project.
☐	I consent to collected data in pseudonymised form being used for research purposes (for example in research articles).
☐	I understand that collected data may be stored at Lund University for up to 10 years after being made publicly available (only in pseudonymised form where my identity is protected).
☐	I consent to audio recording and to the use of quotations. I understand that my name will not be used.
☐	I agree to be interviewed for the above-mentioned study.

Please, sign below to confirm your consent:

	Participant(s)	Researcher(s)
Name(s)		
Signature(s)		
Date(s)		

Appendix B: Consent form, English: non-pseudonymous

Exnovation of ultra-fast fashion in the European union

CONSENT FORM

Information about participation

We would like to ask whether you wish to participate in a research project. In this document, you will find information about the project and what participation entails.

What is the project about and why are we asking you to participate?

Exnovation (termination) of ultra-fast fashion in the European union is part of the research project *Exnovation for a sufficiency-oriented circular economy*. The project aims to explore the possibilities of using exnovation of unsustainable consumption- and production models to reach a sufficiency-oriented circular economy. Ultra-fast fashion presents as an extreme version of linear business practices through intensive resource consumption, short duration of use, and low prices. As such, it is inherently incompatible with sustainable societies, making the elimination of such practices of interest for the transition to a circular economy.

Currently, there is no clear legal or scientific definition of Ultra-fast fashion. One of the objectives of this master's thesis is therefore to develop such a definition whilst simultaneously identifying possible policies for its exnovation. This is complemented by a focused case study of the French legislative proposal aimed at minimising the presence of ultra-fast fashion on French markets.

The research principal for the project is Lund University. The research principal is the organisation responsible for the project.

As part of this project, we invite you to participate in interviews:

We seek to learn more about:

- how businesses experiment with low-, zero-, or post-growth aspirations and alternative value logics;
- how profit, ownership, governance structures, and resource use are redefined in these contexts;
- perceived sustainability impacts and trade-offs of emerging post-growth business models;
- institutional drivers, barriers, risks, and enabling conditions for business transformation;
- policy frameworks and governance innovations aligned with wellbeing-oriented economies.

You will be interviewed by a Master's student.

How will the project be conducted?

You are invited to share your understanding of the phenomenon with the aim of formulating a definition of the business model. Additionally, you will be asked about your opinions and understanding of the legislative proposal in France, and what potential policy interventions could be of interest to remove Ultra-fast fashion from the European market.

The interview will take approximately 45 minutes.

You decide which experiences you wish to share and what you prefer not to discuss.

The interview may be audio-recorded with your consent.

What will happen to your data?

The project will collect and register information about you.

Research data will be archived and deleted in accordance with the research principal's rules on the preservation and disposal of research documents, in line with the General Data Protection Regulation (GDPR), the Archives Act (SFS 1990:782), the Archives Ordinance (SFS 1991:446), and the Public Access to Information and Secrecy Act (SFS 2009:400). Data will be handled in accordance with existing routines at Lund University, including data management plans. Lund University is the data controller.

Personal data, including name and contact details, is processed as necessary to conduct research in the public interest (GDPR Article 6(1)(e)) and handled in accordance with the GDPR.

You have the right to know which personal data we store about you, to receive a copy of your personal data, and to request correction or deletion of your data. Personal data is collected when you participate in an interview as part of our research. These data include your name, contact details, and, if deemed relevant, your workplace.

If you wish to access your data, please contact the principal investigator. The Data Protection Officer can be reached at dataskyddsbud@lu.se

If you are dissatisfied with how your personal data is handled, you have the right to lodge a complaint with the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten), which is the supervisory authority.

Are there potential consequences or risks of participating?

We see no risks associated with participation. You will not be pressured to answer questions or discuss topics you do not wish to address. You may always decline to answer a question.

Participation is voluntary

Your participation is voluntary, and you may withdraw at any time. If you choose not to participate or to withdraw, you do not need to provide a reason. If you wish to withdraw, please contact the person responsible for the project (see below).

How will you receive information about the results?

We intend to use information from the interview when writing public reports and articles. If you would like a copy of our publications, please contact Klara Hemming, hemmingklara@gmail.com, +46 70 892 90 05 or Carl Dalhammar, responsible for the project (see below).

Responsible for the project

The project is led by: professor Carl Dalhammar

The International Institute for Industrial Environmental Economics, Lund University

PO Box 196, 22100 Lund, Sweden; www.iiiee.lu.se, carl.dalhammar@iiiee.lu.se +46 70 296 03 62

Exnovation of Ultra-fast fashion in the European Union

☐	I have received and reviewed the information about the study and have had the opportunity to ask questions. I understand that I may ask additional questions at any time.
☐	I understand that I may withdraw from the study at any time. If so, I should contact Professor Carl Dalhammar (carl.dalhammar@iiiee.lu.se). If I withdraw, I understand that information about my participation will be retained, although my responses will be deleted.

☐	I understand that I may end my participation at any time and/or decline to answer a question without this affecting my participation.
☐	I understand that the information collected will be handled in accordance with GDPR.
☐	I consent to collected data being used for research purposes (for example in research articles).
☐	I understand that collected data may be stored at Lund University for up to 10 years after being made publicly available.
☐	I consent to audio recording and to the use of quotations.
☐	I agree to be interviewed for the above-mentioned study.

Please, sign below to confirm your consent:

	Participant(s)	Researcher(s)
Name(s)		
Signature(s)		
Date(s)		

Appendix C: Consent form, Swedish

Exnovering av ultra-fast fashion i den Europeiska unionen

Information om deltagande

Vi vill fråga dig om du vill delta i ett forskningsprojekt. I det här dokumentet får du information om projektet och om vad det innebär att delta.

Vad är det för ett projekt och varför vill vi att du ska delta?

Exnovering (utfasning) av ultra-fast fashion i den Europeiska unionen är en del av forskningsprojektet Exnovation för en tillräcklighetsorienterad cirkulär ekonomi. Syftet med projektet är att undersöka möjligheterna till att använda exnovation av icke-hållbara konsumtions- och produktionsmodeller för att nå en tillräcklighetsorienterad cirkulär ekonomi. Genom sin extrema resursförbrukning, korta användningstid och extremt låga priser utgör ultra fast fashion en extrem version av den linjära ekonomin, och utfasningen av denna blir därmed av intresse för en framtida cirkulär ekonomi.

Eftersom Ultra fast fashion i nuläget saknar en laglig och vetenskaplig definition, utgör ett av syftena med mastersuppsatsen att producera en definition av fenomenet, och samtidigt identifiera möjliga styrmedel för att uppnå exnovation av modellen. Som en del av detta utförs en mindre fallstudie av den föreslagna lagstiftningen i Frankrike som syftar till just att minimera ultra fast fashion på marknaden. Forskningshuvudman för projektet är Lunds universitet. Med forskningshuvudman menas den organisation som är ansvarig för projektet.

Hur går projektet till?

Du kommer att bli intervjuad av Klara Hemming.

Du är inbjuden för att berätta om dina åsikter kring miljöekonomiska styrmedel för hållbar utveckling i relation till hållbarhet inom ultra fast fashion, samt vad du ser för utsikter för den franska lagstiftningen som styrmedel.

Du väljer själv vilka erfarenheter du vill dela med dig av och vad du inte vill berätta.

Intervjun kan komma att spelas in med ditt samtycke.

Vad händer med dina uppgifter?

Projektet kommer att samla in och registrera information om dig. Dina svar och dina resultat kommer att behandlas så att inte obehöriga kan ta del av dem. Forskningsdata kommer att arkiveras och gallras i enlighet med forskningshuvudmannens regler för bevarande och gallring av dokument i forskningsverksamhet enligt EU:s dataskyddsförordning (GDPR), arkivlagen (SFS 1990:782), arkivförordningen (SFS 1991:446) och offentlighets- och sekretesslagen (SFS 2009:400). Hanteringen av data kommer att ske i enlighet med befintliga rutiner hos Lunds universitet, vilket inbegriper datahanteringsplaner. Lunds universitet är personuppgiftsansvarig.

Personuppgifter, inklusive namn och kontaktuppgifter för forskningspersonen behandlas som nödvändigt för att utföra forskning av allmänt intresse (GDPR, artikel 6, p. 1e). och hanteras i enlighet med den allmänna dataskyddsförordningen (GDPR). Endast pseudonymiserad data kommer att delas i publikationer eller offentliga utställningar relaterade till projektet.

Så länge du kan identifieras har du rätt att få veta vilka personuppgifter vi lagrat om dig, erhålla en kopia av personuppgifterna, och begära att din data korrigeras eller raderas. Personuppgifter samlas in när du deltar i en intervju som en del av vår forskning. Dessa uppgifter inkluderar ditt namn och kontaktuppgifter och ev. arbetsplats om det anses relevant. Om du vill ta del av uppgifterna ska du kontakta huvudansvarig forskare Carl Dalhammar (carl.dalhammar@iiece.lu.se; 046-2220242). Dataskyddsombud nås via dataskyddsombud@lu.se. Om du är missnöjd med hur dina personuppgifter behandlas har du rätt att ge in klagomål till Integritetsskyddsmyndigheten, som är tillsynsmyndighet.

Finns det potentiella följder och risker med att delta?

Den potentiella risk som har identifierats är kopplad till risken för dataintrång och spridning av personuppgifter, även om denna risk är ytterst liten. För att undvika att detta sker tillämpar vi de principer som beskrivs ovan tillsammans med en rad kompletterande åtgärder. Utöver detta ser vi inga risker med att delta. Endast pseudonymiserade data kommer att delas när projektets resultat redovisas i till exempel vetenskapliga publikationer. Du kommer inte att pressas på att svara på frågor eller prata om frågor som du inte vill prata om. Du kan alltid avstå att svara på en fråga om du så önskar.

Deltagandet är frivilligt

Ditt deltagande är frivilligt och du kan när som helst välja att avbryta deltagandet. Om du väljer att inte delta eller vill avbryta ditt deltagande behöver du inte uppge varför. Om du vill avbryta ditt deltagande ska du kontakta den ansvariga för projektet (se nedan).

Hur får du information om resultatet av projektet?

Vi vill använda informationen vi får under intervjun när vi skriver rapporter och artiklar, vilka kommer att bli offentliga. Om du är intresserad av att få en kopia av våra publikationer kontakta Carl Dalhammar (carl.dalhammar@iiece.lu.se)

Ansvariga för projektet

Ansvarig för projektet är:

Carl Dalhammar

Internationella Miljöinstitutet, Lunds universitet

Tegnérplatsen 4

221 00 Lund

Tel: 046 462 220 242

Email: carl.dalhammar@iiece.lu.se

Exnovering av ultra-fast fashion i den Europeiska Unionen

Jag har fått och gått igenom informationen om studien och fått ställa de frågor jag vill. Jag förstår också att jag kan ställa ytterligare frågor när jag vill.

Jag förstår att jag när som helst kan dra mig ur studien. Kontakta i så fall professor Carl Dalhammar (carl.dalhammar@iiece.lu.se). Om jag drar mig ur förstår jag att information om mitt deltagande kommer att behållas även om mina svar kommer att raderas.

Jag förstår att jag kan avsluta mitt deltagande i studien när som helst och/eller avstå från att besvara en fråga utan att det påverkar deltagandet i studien.

Jag förstår att informationen som samlas in kommer att hållas konfidentiell och i enlighet med GDPR.

Jag förstår att min personliga information såsom mitt namn inte kommer att delas utanför forskningsprojektet.

Jag godkänner att insamlad data i pseudonymiserad form kan användas i forskningssyfte (till exempel i forskningsartiklar).

Jag förstår att insamlad data i studien kan sparas hos Lunds universitet upp till 10 år efter att den har blivit tillgänglig för allmänheten (men bara i pseudonymiserad form där din identitet skyddas).

Jag går med på ljudupptagning och att citat kan användas. Jag förstår att mitt namn inte kommer att användas.

Jag accepterar att bli intervjuad för ovanstående studie.

Namn på deltagare

.....

Signatur

.....

Datum

.....

Appendix D: Analysed online documents

Title	Author	Type of document	Publisher	Publication date	Access date	URL
L'"ultra fast fashion" et sa déferlante de tenues	Agente-France Presse	Newspaper article	La Gazette France	2025-06-09	2026-02-16	https://www.lagazettefrance.fr/article/l-ultra-fast-fashion-et-sa-deferlante-de-tenues
L'ultra fast fashion s'accapare 6% des ventes françaises de mode	Guinebault, M.	Website	Fashion Network	2025-11-28	2026-03-19	https://fr.fashionnetwork.com/news/L-ultra-fast-fashion-s-accapare-6-des-ventes-francaises-de-mode,1787127.html
Ultrasnabbt mode	Institutet för språk och folkminnen	Website	Institutet för språk och folkminnen	2025-04-07	2026-03-10	https://www.isof.se/svenska-spraket/facksprak-och-terminologi/termgrupper-och-organisationer/hallbarhetstermgruppen/hallbarhetstermlistan/termer/ultrasnabbt-mode
Hitting the headlines: The ultra-fast fashion business model and responsible business conduct	Koep-Andruieu, H. & Del Valle, H.	Blog post	OECD Blog	2025-10-16	2026-02-16	https://www.oecd.org/en/blogs/2025/10/hitting-the-headlines-the-ultra-fast-fashion-business-model-

						and-responsible-business-conduct.html
What is fast fashion?	McKinsey & Company	Website	McKinsey & Company	2025-01-23	2026-02-23	https://www.mckinsey.com/featured-insights/mckinsey-explainers/what-is-fast-fashion
Billiga kläder, dyr miljö: Därför bör vi tänka om kring ultrasnabbt mode	Molin, J.	Opinion piece	Åbo Underrättelser	2025-01-18	2026-03-10	https://www.abounderrattelser.fi/artikel/billiga-klader-dyr-miljo-darfor-bor-vi-tank-a-om-kring-ultrasnabbt-mode/
« Ultra Fast fashion » : agir face à ses conséquences sur l'environnement	Notre-Environnement	Website	République Française	2025-07-01	2026-02-23	https://www.notre-environnement.gouv.fr/actualites/breves/article/ultra-fast-fashion-agir-face-a-ses-consequences-sur-l-environnement
‘A paroxysm of disposability’: France’s distaste for Shein’s ultra-fast fashion	Pfeiffer, A.	Newspaper article	The Guardian	2025-10-02	2026-02-23	https://www.theguardian.com/business/2025/oct/02/a-paroxysm-of-disposability-frances-distaste-for-sheins-ultra-fast-fashion
Ultra-Fast Fashion Blamed For Industry’s First Rise In	Pinock, O	Magazine article	Forbes	2025-08-14	2026-02-16	https://www.forbes.com/sites/oliviapinock/2025/08/

Carbon Emissions In Four Years						14/ultra-fast-fashion-causes-industrys-carbon-emissions-to-rise-for-first-time-in-four-years/
French Senate backs law to curb ultra fast-fashion	Reuters	Newspaper article	Reuters	2025-06-10	2026-02-16	https://www.reuters.com/sustainability/land-use-biodiversity/french-senate-backs-law-curb-ultra-fast-fashion-2025-06-10/
What is Ultra Fast Fashion? Investigating Why It's Ultra Bad	Shadel, JD.	Website	Good on you	2025-12-01	2026-02-23	https://goodonyou.eco/ultra-fast-fashion/
Europas textil- och modeorganisationer mobiliserar mot ultra fast fashion i gemensamt upprop	The European textile and clothing federations	Declaration	The European textile and clothing federations	2025-09-16	2026-03-09	https://www.teko.se/nyhetscenter/pressmeddelanden/europas-textil-och-modeorganisationer-mobiliserar-mot-ultra-fast-fashion-i-gemensamt-upprop/
Ultra-fast fashion is a disturbing trend undermining efforts to make the whole industry more sustainable	Brydges, T.	Website	The Conversation	2024-04-03	2026-02-23	https://theconversation.com/ultra-fast-fashion-is-a-disturbing-trend-undermining-efforts-to-make-the-whole-industry-more-sustainable-224253
Ultra fast fashion som skjuter i höjden	Medveten Konsumtion	Website	Medveten Konsumtion	2024-05-06	2026-02-23	https://www.medvetenkonsumtion.se/ultra-fast-

						fashion-som-skjuter-i-hojden/
Ultra-fast-fashion är modern rovkapitalism	Odeberg, E.	Newspaper article	Dagens arena	2024-09-01	2026-02-23	https://www.dagensarena.se/opinion/ultra-fast-fashion-ar-modern-rovkapitalism
Ultra fast fashion – tre frågor om det nya fenomenet	Czermak, N.	Website	SVT Nyheter	2023-07-20	2026-02-23	https://www.svt.se/nyheter/ultra-fast-fashion-tre-fragor-om-det-nya-fenomenet
”Fast fashion” på nätet – vår tids nya snabbmat	Johanesson, E.	Newspaper article	Svenska Dagbladet Junior	2023-03-23	2026-02-26	https://www.svd.se/a/KnbYbX/sa-paverkar-fast-fashion-och-textilindustrin-miljon
Vad är ultra fast fashion?	Naturskyddsföreningen	Website	Naturskyddsföreningen	2023-04-27	2026-02-23	https://www.naturskyddsforeningen.se/artiklar/vad-ar-ultra-fast-fashion/
Shein, Zara, H&M: Close-up on the Ultra-Fast Fashion Market	NielsenIQ	Website	NielsenIQ	2023-06-22	2026-02-16	https://nielseniq.com/global/en/insights/analysis/2023/shein-zara-hm-close-up-on-the-ultra-fast-fashion-market/
Ultra-fast fashion charms young despite damaging environment	Agente-France Presse	Newspaper article	France24	2022-07-29	2026-03-09	https://www.france24.com/en/live-news/20220729-ultra-fast-fashion-charms-

						young-despite-damaging-environment
Ultra-fast fashion is taking over – and using every trick in the book to get us addicted	Mahmood, Z.	Newspaper article	The Guardian	2022-04-18	2026-02-23	https://www.theguardian.com/commentisfree/2022/apr/18/ultra-fast-fashion-retail-sites-shein
Shein/Temu: ultra-fast fashion lacks durability for investors too	The Financial Times	Newspaper article	The Financial Times	2023-07-19	2026-03-31	https://www.ft.com/content/a14e7327-c22c-4266-894c-b1a35de905d3?syn-25a6b1a6=1
Les dérives de l'ultra fast-fashion	Agence de la Transition Écologique	Website	République Française	n.d.	2026-03-10	https://epargnonsnosressources.gouv.fr/actualites/ultra-fast-fashion/
Ultra fast fashions – påverkan på avloppsvatten	Stockholm Vatten och Avfall	Website	Stockholm Vatten och Avfall	n.d.	2026-02-23	https://www.stockholmvat tenochavfall.se/artiklar-listsida/miljotips/ultra-fast-fashions/
Ultra Fast-Fashion : Quand la mode va encore plus vite !	Oxfam France	Website	Oxfam France	n.d.	2026-02-18	https://www.oxfamfrance.org/agir-oxfam/ultra-fast-fashion-quand-la-mode-va-encore-plus-vite/
Ultra-Fast Fashion	The Fashion Law	Website	The Fashion Law	n.d.	2026-02-23	https://www.thefashionlaw.com/resource-center/ultra-fast-fashion/

Appendix E: Characteristics of online document analysis, references

Characteristic	Sources
Company-specific	Agente-France Presse (2025), Johanesson (2025), McKinsey & Company (2025), Molin (2025), NielsenIQ (2023), Pfeiffer (2025), Pinock (2025), Reuters (2025) Brydges (2024), Medveten Konsumtion (2024), Odeberg (2024) Czermak (2023), Naturskyddsföreningen (2023), The Financial Times (2023), Agente-France Presse (2022), Mahmood (2022) Oxfam France (n.d.), The Fashion Law (n.d.)
E-commerce	Koep-Andruieu & Del Valle (2025), Pfeiffer (2025), Reuters (2025), The European textile and clothing federations (2025); Medveten Konsumtion (2024), Naturskyddsföreningen (2023), Agente-France Presse (2022), Oxfam France (n.d.), Stockholm Vatten och Avfall (n.d.)
High impacts	Agente-France Presse (2025), Institutet för språk och folkminnen (2025), Johanesson (2025), Koep-Andruieu & Del Valle (2025), McKinsey & Company (2025), Pfeiffer (2025); Molin (2025); Pinock (2025), Shadel (2025) Brydges (2024) Naturskyddsföreningen (2023) Agente-France Presse (2022), Mahmood (2022), Agence de la Transition Écologique (n.d.), Oxfam France (n.d.), Stockholm Vatten och Avfall (n.d.), The Fashion Law (n.d.)
High turnover	Agente-France Presse (2025); Guinebault (2025), McKinsey & Company (2025), Koep-Andruieu & Del Valle (2025) Molin (2025); Notre-Environnement (2025); Naturskyddsföreningen (2023), NielsenIQ (2023); Mahmood (2022); Agence de la Transition Écologique (n.d.), Oxfam France (n.d.)
Low durability	Molin (2025), Shadel (2025), Odeberg (2024), Naturskyddsföreningen (2023), Agente-France Presse (2022) Oxfam France (n.d.)
Low price	Agente-France Presse (2025), Guinebault (2025), Johanesson (2025), Koep-Andruieu & Del Valle (2025), McKinsey & Company (2025), Molin (2025), Notre-Environnement (2025), Pfeiffer (2025), Reuters (2025), Shadel (2025), Brydges (2024), Medveten Konsumtion (2024), Odeberg (2024) Czermak (2023), Naturskyddsföreningen (2023), NielsenIQ (2023), The Financial Times (2023) Agente-France Presse (2022), Mahmood (2022) Agence de la Transition Écologique (n.d.), Stockholm Vatten och Avfall (n.d.), Oxfam France (n.d.)
Low transparency	Institutet för språk och folkminnen (2025), Koep-Andruieu & Del Valle (2025), Molin (2025), Notre-Environnement (2025), Brydges (2024), Naturskyddsföreningen (2023),
Monitoring	Agente-France Presse (2025); Koep-Andruieu & Del Valle (2025), McKinsey & Company (2025); Shadel (2025), Brydges (2024), Oxfam France (n.d.), The Fashion Law (n.d.)

Non-European	Agente-France Presse (2025), McKinsey & Company (2025), Molin (2025); The European textile and clothing federations (2025); Medveten Konsumtion (2024), Naturskyddsföreningen (2023); Oxfam France (n.d.)
Short lead times	Agente France Presse (2025), Molin (2025); Pfeiffer (2025); The European textile and clothing federations (2025); ;; Koep-Andruieu & Del Valle (2025); Medveten Konsumtion (2024), Brydges (2024); Odeberg (2024), Czermak (2023), Johansson (2025), Naturskyddsföreningen (2023), NielsenIQ (2023), The Financial Times (2023), Agente-France Presse (2022), Agence de la Transition Écologique (n.d.), Oxfam France (n.d.), The Fashion Law (n.d.),
Tailored Marketing	Agente-France Presse (2025);Guinebault (2025), Institutet för språk och folkminnen (2025), McKinsey & Company (2025); Notre-Environnement (2025); Pfeiffer (2025); Shadel (2025); Brydges (2024); Odeberg (2024); NielsenIQ (2023), Agente-France Presse (2022); Mahmood (2022) Oxfam France (n.d.), The Fashion Law (n.d.)

Appendix F: Interview guide round 1

Ultra fast fashion vs. FF

- What would you say differentiates UFF from FF?
- Do you think exnovation (removal of the practice) is desirable? Why/why not?

French legislative proposal

- What do you know about the French proposition aimed at UFF?
- What do you consider to be the main purpose of the proposition?
- What do you think about the way the legislation defines UFF?
- How do you think this definition will affect the legislation's aim and results?

Impact of legislation

- What effects do you think the interventions will have on the textile and/or apparel sector in France and internationally?
- What interventions do you see less and more potential in? Why?
- Do you think any of them should be excluded? Why?
- Are there any areas of the UFF model which have not been addressed by the legislation based on what you know of UFF practices?
- Are there any interventions that you would like to see that are not part of the proposition? How would these be implemented?

Policy interactions and future

- How has the proposition influenced the general debate in France/the community?
- What do you feel are the biggest barriers to its implementation?
- What do you expect to happen if the legislation is implemented?
- How do you see the legislation interacting with current and proposed French and EU legislations?
- Are there any other policies or interventions you believe should be implemented on both national and international levels?

Closing questions:

- Is there anything important that I have not asked you about?
- Do you have any suggestions for other people to interview?

Alternative questions if respondent was uninitiated in the French proposal:

- Has the proposal affected the sector or the research community since its suggestion?
- What interventions do you believe would be relevant to phase out UFF?
- What do you believe are the biggest barriers to the phasing out of the business model?
- What do you think is the most important factor contributing to the continuation of the business model?

Appendix G: English Interview guide round 2

Textile policies in the EU

- What experience do you have with policies and other interventions targeting apparel on both EU and national levels?
- What are in your opinion the main sustainability challenges in the fashion industry today?
- What do you see as the main gaps in the current policies targeting the fashion industry?

UFF vs. FF

- What is your understanding of UFF, what distinguishes it from Fast fashion?
- Do you think that trying to phase out ultra fast fashion from the European market is a good idea?

Policy suggestions

- Do you think policy can realistically drive systemic change, particularly to address overconsumption and -production?
- Could the following policies influence the market and consumer behaviour, and how?
 - Ecodesign requirements of:
 - Minimum amount of recycled fibres
 - Durability to improve resistance to colour change, shape change, pilling, fasteners etc.
 - Criteria on material quality
 - Information on geographical origin of both synthetic and natural fibres, textiles and apparel
 - Ban on destruction of unsold and returned goods
 - Ecomodulation of fees based on environmental performance
 - Restriction or complete ban of marketing and advertising of UFF companies and/or products
 - Taxing unsustainable products and subsidising sustainable products for consumers
 - Fee on e-commerce packages €3-5

Risks and barriers

- Are there any risks of unforeseen, negative consequences or barriers to these policies?
- Are there any risks to using national policies? What policies should be set by the EU?

Impact of DPPs

- Could the DPPs support these policies, and if so how?

Policy gaps

- Are there any other policies or interventions you believe should be formulated that are missing in today's landscape?

Emotional durability

- Previous interviews and research suggests that the current proposals and legislations fail to address emotional durability and overconsumption/-production. Do you agree? In such a case, how should we address this problem?

Closing questions

- Is there anything important that I have not asked you about?
- Do you have any suggestions for other people to interview?