

Revision of the Textile Labelling Regulation

Key messages

- **Regulatory coherence is crucial** to ensure a well-functioning policy framework, remove trade barriers and facilitate implementation by economic operators – it is key to provide legal certainty and avoid fragmentation and duplication of obligations.
- **Information requirements on sustainability and circularity** will be regulated under the **future ecodesign delegated act for textiles**. It is important to ensure that there are no duplication of obligations under the revised textile labelling regulation.
- **Harmonisation of labelling standards is key**, particularly concerning testing methods and ISO standards.
- **Increase tolerance margin levels** to support continued innovation in the sector.
- **Fibre composition, size and care label** should be communicated on the physical label. None-essential **additional information** on a product's characteristics should be provided **through a digital label**, including all information requiring translations. However, new additional information through a digital label must be **based on clear consumer evidence** for this **widespread need**, and **avoid duplication of obligations**.

Ensure regulatory coherence

Regulatory coherence is crucial to ensure a well-functioning policy framework, remove trade barriers and facilitate implementation by economic operators – it is key to provide legal certainty and avoid fragmentation and duplication of requirements.

The EU Strategy for Sustainable and Circular Textiles (March 2022) presented an extensive set of actions to address textiles' production and consumption, aiming to create a greener, more competitive sector. The Commission has since published a number of initiatives to implement the Strategy. Sustainability-related and social aspects of the textile sector are already addressed in complex horizontal regulatory proposals, the Ecodesign for Sustainable Products Regulation (ESPR) and the Corporate Sustainability Due Diligence (CS3D) respectively. Moreover, the ESPR introduces the digital product passport (DPP) to digitalise product information. The Empowering Consumers Directive and the Directive on Green Claims will soon regulate the communication of voluntary sustainability claims, while the revised Waste Framework Directive (WFD) will address the basic concepts related to end-of-life management.

We emphasise the importance of **assessing the interplay between vertical and horizontal initiatives addressing textile products** and to **ensure a coherence approach** to their regulation.

We call on the Commission to follow the principle of policy coherence and avoid duplication of obligations.

Harmonisation of labelling standards

1. *Testing methods of fibre composition with global standards*

The TLR should **reference the ISO Standards instead of replicating them in Annex VIII** to ensure complete harmonization, especially in case of updates.

Currently, Annex VIII specifies laboratory methods for testing of fibre compositions. In most cases, these standards are similar to the international ISO/EN standards. However, the existing differences in method parameters lead to discrepancies in test results. This situation results in increased testing for products destined for the European market, and significant costs raises.

ISO/EN standards are widely applied and favourable to a sector where global value chains are necessary to meet markets demands. Their use will not only simplify the testing process, but reduce complexity in verification and streamline processes, facilitating economies of scale and market competitiveness, which are especially important for the SME dominated textile sector.

EuroCommerce calls for the revised TLR to refer to ISO standards.

ISO standards for testing:

- ISO 1833-1 to 1833-29. Qualitative testing
- ISO/TR 11827 Textiles — Composition testing — Identification of fibres
- ISO 20705 Quantitative microscopical analysis. It is mainly used to distinguish fibres in kingdoms of the same nature, for example the mixture of animal fibres, wool-cashmere

2. *Harmonised standards for listing fibre names & creating new generic names*

A **more flexible approach to fibre classification** is needed to address the development of innovative fibres, **easing the classification process** (provided in Annex II), and facilitating a more technically accurate classification of novel fibres when ready for commercialisation. Importantly, classification of these novel fibres should have an **associated testing method** to determine the fibre composition set out in Annex VIII, and thus be able to be labelled. This is necessary to provide consumers with accurate information and to support sustainable textile innovation.

Therefore, the revised TLR should adopt a **delegated act to introduce new fibre names following EN ISO standards** such as ISO 2076:2021 (for man-made fibres); **Annex I should be constantly updated following EN ISO standards.**

In addition, we call on the Commission to **consider having broader umbrella categories as an option** (USA and China approach), whereby all similar types of existing or new fibres (in terms of their characteristics) can fall under the same umbrella category - no need for new classification, but rather the fibre can fit into this umbrella category. E.g., any type of new fibre that is made using wool (labs wool, lama wool, sheep wool), all can come under the broad category "wool". However, **companies should be able to opt out & apply a more specific name.**

Lastly, harmonisation with World Customs Organisation HS nomenclature is welcome by adding HS/CN codes to Annex I (i.e. a table of correspondence between customs codes & TLR fibres).

Increased tolerance margin levels

Current available testing methods in Annex VIII and ISO standards have an uncertainty higher than 3%; this creates an obstacle for both virgin and recycled fibres. An updated framework is essential to ensure that tolerance levels are aligned with the capabilities and precision of the test methods available to ensure legal compliance and to support of continued innovation in the sector.

EuroCommerce calls for **higher tolerance levels, at least 5% for all fibres**. A **higher** tolerance level should be considered for **recycled materials**.

This revision is essential due to the growing emphasis on using recycled content. Additionally, this revision should not be limited to recycled fibres but must also account for the introduction of new virgin fibre types that require updated tolerance levels to accommodate their corresponding analytical methods (need of clarity when we mix materials recycled-virgin).

We also call for **guidance** on how current tolerance levels may be best used is also needed, both **for companies and national competent authorities**, and in particular to the use of **cumulative percentages**.

Lastly, we stress that an increased tolerance level should only be used for variation where limitations exist in recycling technology, and **not justify poor practices**.

Conceptual approach for labelling exemptions

EuroCommerce supports a **conceptual approach** —anchored in a clear definition and supplemented with non-exhaustive examples—for identifying products exempt from mandatory labelling requirements. This should be accompanied by a **detailed implementing guidelines** to assist in determining which textile products require labelling or marking and which do not. The revised TLR must retain sufficient **flexibility to accommodate ongoing innovation** within the sector.

A suitable conceptual approach could include a definition such as: *"If adding or removing a composition label will damage the product or its functionality, permanent labelling is not mandatory."* This would be particularly relevant for products like **stockings, socks, gloves, or hair band accessories** etc. For such items, care and composition information can still be stated in other places such as the packaging or product hangtags.

Physical label vs digital label

Physical label

Fibre composition, size and care label should be communicated on the physical label, given that these are essential information for consumers to make a purchasing decision. The Commission should nonetheless consider an **overall significant reduction in label size**.

Digital label

None-essential additional information on a product's characteristics should be provided through a digital label, including all information requiring translations. However, new additional information through a digital label must be **based on clear consumer evidence** for this **widespread need**. Moreover, we ask the Commission to assess whether new domains or information is/will be regulated under other EU legislative acts (e.g. ESPR, Empowering Consumers, WFD, REACH, CLP, GPSR, EU Organic Regulation, Green Claims) – duplication of obligations should be avoided.

Technology-neutral legislation is key

When developing detailed policy options including **IT solutions** it is important that they are **based on a technology- neutral and interoperable basis** and should not revert to the outdated, resource heavy approach of using central repositories. As such, we believe that **businesses should have the flexibility to choose the technology that best suits their operations and financial capacities**. The revised TLR should be technology agnostic, not mandate for developments that might constraint the market evolution towards a more efficient circular industry.

For optimal consumer experience, **digital information must be unified under one data carrier within the Digital Product Passport (DPP)** that will be further developed in line with the ESPR Delegated Act. Such an approach avoids consumer confusion (i.e. “which trigger should I scan?”) and leverages technology to provide comprehensive product information. Consequently, the timeline for DPP provisions for the textile sector must be aligned with the TLR revision and any overlaps between requirements should be avoided.

Lastly, we ask the Commission to acknowledge the challenges associated with long-term data storage. Maintaining data over extended periods —particularly in multiple languages to meet the needs of diverse markets—presents significant environmental and economic implications. Data storage infrastructure requires substantial energy and water resources, contributing to environmental strain, while also imposing considerable operational costs on business operators. Therefore, the revised TLR should foresee a **reasonably short storage period to ease the burden of businesses while ensuring continued regulatory compliance**.

New labelling domains

Likely to be in physical label

Care label. Call for mandatory **ISO Standard 3758**, and voluntary GINETEX. Regulation shall harmonise rules and ensure the use of symbols free of charge.

Size. We do not support the introduction of EU-wide uniform size. Sizing of textile products is directly linked to a company’s customer target decisions. Different companies have clothing lines for different groups of people, age groups, even countries. Body measurements largely depend on the company’s choice of the target group. **Size uniformization would therefore hinder companies’ freedom of choosing their customer target group and make it harder for consumers to choose garments that match their style**. Furthermore, this will imply potential trade barriers with other markets.

We don't support a mandatory EU-wide measurement standard because **it would imply a lot of changes / impact, and it will cost a lot because we will have to re-design all our products**. Also, if we harmonize the size, it will **impact the style** and the use of some product because linked to the particular use of some product in sport, we can't follow some classic rules.

Origin/”made-in”. We support **mandatory rules on “made in” (meaning the last country of assembly of the product)**. Any other information related to the origin (traceability) of the product should be dealt with under the ESPR DA/DPP. It is important to respect the same rules as customs.

We do not support “made in EU”, only Member State-specific.

Non-textile parts. We do not support broadening the scope of the TLR to non-textile products. This will not help the consumers to make a more informed purchase decision. Additionally, it could

extend the categories of goods impacted by the care label obligation, which would be a step backwards in terms of dematerializing information.

Leather labelling. Currently, there is no official method to identify the species of leather. Moreover, DNA analysis are complex and costly as DNA is destroyed during the tanning process. Experts only know how to differentiate whether a skin is bovine, sheep, goat or crossbred. However, the species cannot be identified. We therefore welcome the Commission exploring **mandatory harmonised rules and test methods on leather and fur authenticity, while these would not require identification of the species.** The Commission should aim **for international harmonisation.**

Likely to be in digital label

Sustainability & circularity information. The ESPR Delegated Act for textiles will regulate and establish sustainability and environmental information requirements on textile products, via the DPP. Therefore, the revised TLR should not duplicate obligations to provide this kind of information nor via its future digital labelling.

Alignment with existing legislation is particularly important to ensure that no additional circularity and sustainability information is mandated *beyond* what has been agreed upon in the ESPR Delegated Act.

Allergenic substances. Chemical obligations for consumer articles are already being split between the REACH and CLP Regulations as well as ESPR. Our members continuously enforce and reinforce control processes to avoid the appearance of the presence of allergenic substances in compliance with EU rules. Further rules on allergenic substances would only contribute to further fragmentation and confuse consumers.

Supplementary information on care (other symbols & supplementary wash/iron/dry info, environmental purposes, information from right to repair & empowering consumers directives).

- Repair and guarantee information are already addressed under Empowering Consumers Directive – important to avoid duplication of obligations;
- Waste and disposal information will be tackled under the Waste Framework Directive (WFD);
- Safety-related information is tackled under REACH and General Product Safety Regulation (GPSR).
- Further information on maintenance should be provided under the future ESPR DA (information requirements on maintenance and refurbishment).

Language-independent fibre codes. We welcome the initial reflection on language-independent fibre codes which could replace the translated fibre names on physical labels. Language-independent codes can help reduce the size of physical labels. An international approach however would be necessary to ensure efficiency & avoid duplication of obligations on companies who trade inside & outside the EU (complying with different rules for different markets). If the EU Commission was to move forward with the EU-wide fibre code, we call it to issue a harmonization proposal to the international standardization organizations.