

ESPR Delegated Act for Apparel Textiles Products

1. General key messages

- We stress the importance of having a **stepwise and harmonised EU approach** to the development of ecodesign requirements for apparel products to improve their environmental performance and **become the norm in the Union market**.
- The delegated act should build on **existing industry knowledge** to drive change in a feasible way and ensure competitiveness.
- **Striking a balance** between known **trade-offs** among ecodesign requirements will be key to the success of these market access measures in improving the environmental performance of apparel products while ensuring feasibility.
- **Scalability** in the context of **verification** of ecodesign measures is **paramount**.
- A **transition period** of **minimum 36 months is essential** for the textile industry to adopt the new ecodesign requirements effectively.
- It will be critical to **bring actors across our global value chains along on the journey** of adapting to new legislation, especially suppliers who have highly diverging starting points.

2. Performance requirement

The first ecodesign performance requirement should focus on a **recycled content** requirement **calculated as an aggregated average across all products placed on the global market** by the **economic operator**, following the calculation method from the Single Use Plastics Directive.

2.1. Recycled content

- Setting recycled content requirements can play an important role in supporting circularity objectives, provided that such requirements are technically feasible, scalable and do not undermine the competitiveness of the apparel sector.
- The high complexity of apparel products creates technical limitations, deeming it necessary to establish **recycled content requirements calculated as an aggregated average across all products placed on the global market by the economic operator**, coupled with **product level information requirements to foster sustainable consumption**.

- We welcome the revised definition of recycled content which includes **post-industrial waste, pre-consumer waste** and **post-consumer waste**, as well as the possibility of using **other waste sources** as a transitional measure.
- **Known trade-offs in apparel characteristics** need to be considered when setting recycled content requirements.

2.1.1. Recycled content requirement calculated as an average across all products

The high complexity of apparel products presents significant technical limitations that hinder the establishment of recycled content requirements at product level. The ability of an individual product to incorporate recycled content varies widely, **depending on their intended application, required technical characteristics, and the specific type of fibres, yarn and fabrics used**. Establishing minimum requirements of recycled content at product and fibre levels limits the ability to incorporate recycled content due to feasibility constraints, ultimately resulting in very low minimum thresholds. Furthermore, it would necessitate multiple exemptions, as recycled alternatives are not yet available for several materials, such as, silk or acrylic.

To address these challenges and maximise the impact of this measure, we propose adopting a **recycled content requirement, calculated as an aggregated average across all products placed on the global market by the economic operator**. The proportion of recycled content shall be calculated by dividing the **total weight of recycled fibres in products** placed on the global market by the economic operator by the **total weight of fibres in those products**. This calculation model is inspired by the Implementing Decision 2023/2683 regarding the Single Use Plastics Directive and in line with section 93 of the FAQ on ESPR of September 2024. In essence, this approach recognizes that the primary objective is to maximise the overall volume of recycled content placed on the market, rather than to ensure that each individual product contains recycled material.

Having a **minimum requirement for recycled content, calculated as an aggregated average across all products placed on the global market by the economic operator**, will:

- Reduce the risk of non-compliance due to technical limitations. Companies will have the flexibility to include recycled content based on product feasibility.
- Maximise the potential use of each recycled fibre, not limited to cotton, polyamide, polyester and wool.
- Reduce the risk of inaccurate claims due to low content minimum requirements.

This approach would optimise the allocation of recycled fibres across product lines, **in line with technical specifications**, while **reflecting** the practical **realities of production**. Moreover, it would help stimulate consumer demand, incentivise innovation and support scaling up of recycled fibre markets.

2.1.2. Importance of a thorough definition of “recycled content”

- **Post-industrial, pre-consumer and post-consumer waste** must be **allowed feedstock** for recycled content. Until the textile recycling ecosystem is in place, **flexibility in feedstock sources will be essential** to advancing circularity in textiles.

We welcome the inclusion of post-industrial and pre-consumer textile waste within the definition of recycled content, as it reflects sector realities and supports the scaling up of recycled materials in the textile industry. The use of post-industrial waste in recycling processes is

essential for several reasons: (1) due to the inherent nature of textile production, a certain level of waste is unavoidable, and landfilling should be minimised; and (2) its use is critical to meeting specific quality requirements, particularly in chemical recycling processes.

We also welcome the inclusion of open-loop sources within the definition of recycled content as a transitional measure. While we agree that textile-to-textile (T2T) recycling efforts should be prioritised, we emphasise that open-loop solutions should remain an acceptable option during the transition phase. These solutions can then be progressively replaced by T2T recycling as such technologies scale up and become more widely available.

2.1.3. Verification of recycled content

To verify recycled content requirement, calculated as an average across all marketed products, we propose **relying on the limited assurance process established under the Corporate Sustainability Reporting Directive (CSRD)**. Under this approach, reported data would be subject to review by an independent third-party assurance provider.

For the purpose of demonstrating compliance with the performance requirements, companies should compile and report aggregated recycled content data at company level. These data would then be subject to the relevant verification and audit procedures.

Furthermore, the volumes associated with recycled content certificates are already subject to monitoring and reporting requirements. As a result, an additional verification system would risk creating unnecessary administrative burden and duplication, without proving significant additional assurance regarding compliance.

2.1.4. Consider trade-offs in apparel characteristics

- **Known trade-offs** in apparel characteristics will **shape performance requirements**

When establishing recycled content requirements, it is essential to **consider trade-offs in apparel characteristics**. For instance, products made from natural fibres such as cotton or wool may face greater challenges in achieving high levels of recycled content while maintaining the same level of durability as would be obtained using virgin materials. This is particularly relevant due to the mechanical recycling process, which can reduce fibre length and strength. In such cases, the use of virgin materials may be necessary to preserve product performance and ensure durability.

2.1.5. A performance requirement cannot be set at product level

We do not support the introduction of **recycled content performance requirements at product level** for the following reasons:

- **Inappropriate calculation methodology:** The standard approach typically calculates recycled content based on the total weight of the product rather than on the total weight of the fibres. This leads to distortions, particularly for products containing non-textile components (e.g. trims, accessories), and does not accurately reflect the actual fibre composition or the efforts made by manufacturers to incorporate recycled fibres.
- **Challenges in verification and increased risk of inaccurate claims:** Measuring and verifying very low levels of recycled content is inherently complex and increases the risk of misreporting or fraud. This is consistent with the Textile Labelling Regulation (TLR), which exempts fibres representing less than 5% of the total product weight from labelling requirements, recognising the technical difficulty and limited relevance of tracing such low concentrations.

- **Technical and supply constraints:** Significant technical limitations restrict the availability and use of recycled materials across different fibre types. For instance, constraints linked to specific materials (e.g. polyamide/“nylon”) or the limited availability of certain natural fibres such as wool can make it difficult to incorporate recycled content while maintaining product quality and performance. Establishing binding targets at both product and fibre levels would therefore disproportionately constrain product design and manufacturing processes.
- **Risk of counterproductive outcomes:** Due to these constraints, product-level requirements would likely result in **very low minimum thresholds** that do not meaningfully drive circularity, while still imposing considerable compliance burdens. In practice, this could undermine innovation and divert efforts away from more effective measures.

More broadly, increasing the use of recycled materials is better achieved through **flexible and realistic recycled content requirements calculated as an average across all products**, combined with measures that support the **scaling of recycling technologies, improved collection and sorting systems, and market demand for recycled fibres**.

3. Information requirements

The first ecodesign information requirements should focus on **robustness, recycled content** and **substances of concern**. Communication should be done **only via digital means**.

3.1. Robustness

We believe that the JRC 3rd milestone proposal on robustness will contribute to extending service lifetimes, as it addresses the primary causes of product failures while remaining consistent with the principles of cost-efficiency and scalability. We consider that defining robustness as an informative requirement represents an effective step in supporting the textile industry, particularly a supply chain predominantly located outside Europe and largely composed of SMEs, without undermining competitiveness or jeopardising business viability.

An informative approach will enable stakeholders across the value chain to assess durability and pursue product improvements, while avoiding the potential drawbacks associated with a performance-based methodology. It is also expected to encourage brands to develop and implement internal standards aimed at enhancing product performance.

At this stage, robustness constitutes a pragmatic and reliable proxy for improving product durability, while also laying the groundwork for a potential future transition towards performance-based requirements as methodologies and technologies further mature.

3.1.1. Robustness framework requires certain adjustments

We welcome the JRC 3rd milestone proposal on robustness, which addresses the primary causes of product failures while remaining aligned with the principles of cost-efficiency and scalability.

While informative requirements are beneficial and represent the most appropriate pathway to improving product performance without adversely affecting industry competitiveness, **certain adjustments are necessary to ensure the proposal is both feasible and cost-effective**, namely:

- **Ensure fibre equal treatment, while maintaining the inherent simplicity of the robustness framework**, so that products can be compared according to what is technically achievable within their respective fibre family, thereby avoiding the penalisation of products due to intrinsic properties of certain fibres compared to others. In particular, the proposed approach may disadvantage natural fibres, whose inherent characteristics can result in lower scores for certain robustness parameters than synthetic fibres, without this reflecting inferior design or manufacturing quality. Natural fibres also provide important attributes for product usability – such as breathability, comfort, thermal regulation and sensory performance – which contribute to the overall performance of a product but are not captured by the robustness framework alone. This could distort the assessment of product performance and inadvertently steer material choices towards fibres that achieve higher robustness scores, potentially at the expense of overall product performance, including key aspects such as functionality and user comfort.
- **Favouring category classes over point scores.** Textile manufacturing cannot always deliver perfect consistency. Variations occur between the start and end of a production batch due to machinery, human factors, and other variables. These small variations are part of normal industry reality and do not reflect substantive changes in product quality or design. In addition, testing instruments and visual assessments (used for most appearance-after-wash parameters) also involve tolerances. When regulatory proposals rely on scoring scales and/or narrowly defined thresholds, they may create significant compliance risks that are not linked to meaningful differences between products. In some cases, the proposed thresholds are so narrow that they fall within the margin of error of the tests themselves. Using broader and fewer performance classes would enhance the robustness, scalability and consumer relevance of the system. A performance-class approach is therefore considered more appropriate than a highly granular, point-based scoring system. Consumers are already familiar with performance classes in other regulated product categories, where they provide a clear, intuitive and comparable indicator.

3.1.2. Compliance and verification

The assessment of conformity is a critical element in ensuring that robustness requirements can be implemented in a feasible, timely and cost-effective manner. In this regard, it is **essential that compliance testing is not restricted exclusively to third-party laboratories**, as this could create significant bottlenecks in testing capacity and lead to delays. In an industry characterized by complex and globally distributed manufacturing processes, such delays may have material operational and financial implications, including increased costs that ultimately undermine overall industry competitiveness.

Allowing the use of internal laboratories provides an important operational advantage, enabling manufacturers to monitor production from its early stages, promptly identifying deviations, and progressively implement the necessary adjustments. This approach reflects established textile manufacturing practices, which are based on continuous control and iterative improvement, rather than relying solely on ex post compliance verification.

Verification by market surveillance authorities could then continue through aleatory checks, consistent with the risk-based approach outlined above.

Importantly, the future delegated act needs to acknowledge that the range of apparel companies falling within the definition of a "**large enterprise**" remains highly diverse and therefore requires a proportionate approach.

Companies operating in only one or a limited number of countries may still qualify as large enterprises; however, their production volumes are often not comparable to those of multinational companies or international groups. As a result, the cost of testing increases disproportionately as production volumes decrease.

When determining the type and number of tests required, the specific circumstances of these **"smaller large enterprises"** should be taken into account to ensure that the framework remains proportionate and feasible for all companies falling within the scope of the requirements.

3.2. Recycled content

We support providing information on recycled content at product level, substantiated through traceability systems

Concerning verification, the delegated act should establish a clear and harmonised methodology for substantiating recycled-content information, including clear criteria for the calculation, assessment and verification of recycled fibre content in the final product.

It should also take into account that, under current industry-wide standards relying on chain of custody (CoC) systems, the issuance of the final product traceability check (TCs) often involves significant lead times. As a result, recycled content and other sustainability attributes might not be verifiable at the moment the product is placed on the market, limiting the ability to timely communication to consumers.

In light of the current limitations of the CoC system, and in order to balance consumer information objectives with proportionate compliance requirements, we propose **allowing communication on recycled content once intermediate TCs are available**.

To ensure reliable, operational, and scalable traceability throughout the supply chain, it is essential to recognise the value of **both standard-defined traceability systems and retailers' own traceability procedures and tools**. Combining these approaches ensures effective fibre traceability from source to finished product.

3.3. Substances of concern

- The forthcoming delegated act should establish a **pragmatic stepwise approach** for enacting substances of concern information requirements over time.
- We support having **information requirements on SoC (a), (b) and (c)**, provided that they apply from the date of application of the delegated act or 36 months after the publication of the delegated act in the Official Journal, whichever is later.
- We **support** the findings in the JRC 3rd milestone that **there are no relevant SoC (d)** substances which are known to have a **negative effect on reuse and recycling**.
- **The textile sector is downstream user of the chemical industry**; therefore, requirements to track substances of concern should be coupled with a framework where the **chemical industry**—both in and outside the EU—is **compelled to provide the information** about the presence of SoC in the chemical products **through the Safety Data Sheets**.

3.3.1. A pragmatic stepwise approach as proposed

The volume of substances of concern (SoC) information planned for disclosure under ESPR **exceed all existing chemical disclosure obligations globally**, posing substantial logistical and economic challenges for supply chain actors, as well as for the Commission and Member States

in terms of **effective management and enforcement**. To meet the ESPR objectives, reduce enforcement burden on authorities and safeguard competitiveness, **a stepwise approach is essential**.

In this regard, **EuroCommerce supports and refers to the pragmatic stepwise approach as proposed by the Apparel and Footwear International RSL Management (AFIRM) Group**, an organisation composed of experienced chemicals management and testing experts from leading apparel and footwear companies.

3.3.2. Thresholds for SoC (a) and (c)

We support the establishment of a 0.1% limit for the purpose of tracing Substances of Concern (SoCs) under categories (a) and (c). A 0.1% w/w reporting threshold for SoCs (a) aligns with existing REACH SVHC notification obligations via the SCIP database, in accordance with Article 9(1)(i) of the Waste Framework Directive 2008/98/EC, thereby ensuring regulatory consistency. In line with AFIRM's position, we see limited value for authorities in receiving information on SoCs (c) that may be present in trace concentrations below their established legal thresholds.

Furthermore, the 0.1% limit is generally associated with intentional presence, which constitutes one of the scope conditions. In addition, this notification threshold facilitates the use of Safety Data Sheets (SDS) to trace SoCs through chemical inputs across the supply chain. This approach would improve the conditions for the textile industry to try to ensure traceability without resorting to systematic product testing, which would otherwise entail significant administrative and economic burdens while offering limited efficiency gains.

Nevertheless, it should be acknowledged that tracing SoCs from chemical inputs through to the final garment remains challenging, given the current level of transparency within the chemical industry (notably via SDS) and the limitations of available tools on the market.

These challenges are further compounded by structural issues that still need to be addressed, including: (1) the delayed incorporation of newly introduced harmonised hazard classes under the CLP Regulation into the UN GHS framework; (2) the inconsistent adoption and implementation of the UN GHS across manufacturing countries; and (3) the lack of alignment of chemical disclosure requirements in Safety Data Sheets across jurisdictions.

Finally, it can be argued that separate reporting obligations for SoCs (a) and (c) may not be necessary, as these substances are, in most cases, also captured under SoCs (b) due to their CLP hazard classifications. A more streamlined approach to SoC reporting would therefore help eliminate unnecessary duplication and improve overall regulatory efficiency.

3.3.3. Thresholds for SoC (b)

We support the establishment of the limits set out in Table 1.5.1 for the purpose of tracing Substances of Concern (SoC) under category (b). This notification threshold enables the use of Safety Data Sheets (SDS) to trace SoCs via chemical inputs throughout the supply chain. In turn, this allows the textile industry to ensure traceability without the need for systematic product testing, which would otherwise entail significant administrative and economic burdens while offering limited efficiency gains.

However, it must be noted that the CLP Regulation is applicable only within the EU and currently diverges from the UN GHS framework with regard to certain hazard classes not included in the GHS (notably endocrine disruption, PBT, and vPvB). As a result, suppliers located outside the EU may not classify or communicate these hazards in their SDS, which further complicates traceability efforts across global supply chains.

3.3.4. No requirements for SoC (d)

We agree that no information requirements are necessary for SoCs (d) based on technical constraints, as no substances have been identified that demonstrably hinder recycling processes. There is currently no evidence that any substance constitutes a technical barrier to recycling. Recycling should instead be regarded as a dynamic and evolving field, where ongoing technological progress and the development of alternative recycling solutions will continue to enhance circularity.

However, if requirements were to be applied, the implementation of “alert concentrations” (Calert) in the textile sector would be both impractical and ineffective. Reliance on Safety Data Sheets (SDS) as the primary source of SoC information would be insufficient in cases where substances are not classified as hazardous under CLP or the UN GHS, or where Calert levels fall below the 0.1% threshold and are therefore not declared. This would leave supply chain actors without the necessary traceability information and, in practice, would necessitate systematic product-level testing – an approach that is neither technically nor economically feasible.

Moreover, we disagree with the identification of the so-called regulatory and customer-driven limitations as substances under category (d). In our view, the proposed sets of substances do not align with the definition of the substances hampering recycling as set out in Article 5(14) of the ESPR, i.e. the presence of such substances may make reuse or recycling processes more complicated, demanding in terms of energy or resources, have a greater environmental impact, diminish the quality of the recycled material or negatively affect its aesthetic or olfactory properties.

Furthermore, the mere existence of a restriction threshold, whether established in legislation or in a private standard, does not by itself demonstrate a technical impediment to recycling, nor does it indicate that a substance is capable of disrupting recycling processes.

3.4. Communication via digital means

Regarding the potential use of a label or hangtag, we consider that this requirement should be **implemented exclusively through digital means** – either via the Digital Product Passport or, alternatively, through a digital label integrated within the Digital Product Passport’s infrastructure, to ensure feasibility and affordability.

Physical hangtags would require additional material use, printing, and attachment processes, and could disrupt manufacturing workflows, as product-specific information is often finalised after production. They may also create logistical inefficiencies in global distribution systems, including the need for market-specific relabelling.

By contrast, a digital approach preserves existing production and distribution processes, allows tailored information per market and updates once final data is available, reduces the risk of errors, and avoids unnecessary material consumption.

4. Evaluation of conformity and compliance documentation

We propose the adoption of a **self-assessment procedure based on a risk-based approach to demonstrate compliance** with ecodesign requirements, as applied under the REACH Regulation or the General Product Safety Regulation (GPSR).

It is important to recognise that, given the nature of textile products and the types of requirements introduced through ecodesign legislation, mandatory third-party verification for all products would not constitute a proportionate regulatory measure. The textile sector is characterised by a very large number of stock-keeping units (SKUs), often differing only in colour, size, composition,

or finishing treatments. While these products may share the same manufacturing processes and comply with the same technical specifications, a requirement to obtain third-party verification for every individual product variation would create substantial administrative complexity and costs without delivering a commensurate environmental benefit. Furthermore, ecodesign requirements for textiles are generally linked to product characteristics, manufacturing processes, and supply-chain management practices that can be effectively assessed through manufacturers' internal control systems and risk-based testing procedures. Requiring universal third-party verification would therefore impose excessive and disproportionate burdens on economic operators, particularly SMEs, undermining the commercial and operational viability of businesses and negatively affecting the competitiveness of the European textile industry.

In line with Article 9 of the GPSR, manufacturers are responsible for ensuring that products placed on the market are designed and manufactured in accordance with general safety requirements. This responsibility includes the development (by manufacturers) of **internal compliance systems**, involving testing programmes targeting product categories with the highest likelihood of non-compliance, drawing on the manufacturer's technical expertise and sector-specific knowledge.

Accordingly, we strongly recommend that compliance documentation should not be mandated at the individual product level. Instead, as is common under both chemical and general product safety regulations, market surveillance authorities should conduct aleatory checks to verify compliance.

5. Requirements that should not be considered at this stage

5.1. Information requirement on recyclability

We disagree with defining a recyclability requirement for the following reasons:

- Recyclability depends on the state-of-art technology, which is still rapidly evolving.
- The recyclability of garments is influenced by numerous factors, which vary significantly across recycling processes. Different recycling technologies are capable of processing different fibre types and fibre combinations, and each requires specific preparation requirements.
- A recyclability framework should not focus on a single recycling technology or pathway, as mechanical, chemical, and other recycling technologies are complementary and together contribute to the development of a circular textile system.
- The proposed scoring methodology risks oversimplifying complex technical realities and may ultimately mislead consumers regarding the actual recyclability of textile products.

Furthermore, increasing the availability and uptake of recycled materials would be more effectively achieved through carefully designed recycled content requirements that take into account the technical constraints and performance requirements of textile products. Such an approach would provide clearer market incentives for investment in recycling technologies and the development of recycled material supply chains.

5.2. Information requirement on environmental and/or carbon footprint

We believe that the priority should be the establishment of a single, harmonised EU-wide methodology for assessing the environmental footprint of products. Such a framework must be scientifically robust, meaningful, impactful, and consistently applied across all Member States,

while providing clear added value compared to existing national methodologies. A holistic approach to footprint assessment is essential to avoid misleading conclusions regarding the environmental performance of products.

Should environmental or carbon footprint information requirements be introduced in the delegated act, it is essential that:

- a single, harmonised EU methodology is applied consistently across all Member States;
- sufficiently granular, representative, and regularly updated secondary datasets are made available; and
- harmonised guidelines for primary data collection are established to ensure consistency, transparency, and comparability of assessments.

In addition, any information requirement relating to environmental or carbon footprint should not focus exclusively on Life Cycle Stage 2 (LCA2 – manufacturing). Manufacturing alone represents only a limited share of the overall environmental impacts and would therefore not provide consumers with a sufficiently accurate or meaningful picture of a product's footprint. At a minimum, both raw material production and manufacturing stages should be assessed together in order to provide a more realistic representation of the environmental impacts associated with the production of textile products.

Therefore, the priority should be to strengthen and improve existing databases through the development of new, high-quality datasets capable of addressing current data gaps and enabling fair, robust, and comparable assessments across products and markets.

5.3. Information on repair services

We do not support the introduction of an information requirement relating to repair services.

Requiring retailers to provide information on repair services could unintentionally create a de facto obligation to repair products, even in situations where repair is technically impossible, unsafe, economically disproportionate, or not desired by consumers. Such a requirement would therefore place an unfair and unrealistic burden on retailers.

Even if introduced on a voluntary basis, such a requirement could still influence how retailers communicate with consumers and structure their service offerings. Furthermore, the existence of an information requirement on repair services could indirectly trigger obligations under the Right to Repair Directive.

The application of such obligations to textile products risks creating disproportionate burdens, given that the feasibility and appropriateness of repair depend on a range of factors, including technical limitations, operational feasibility, product safety, aesthetic considerations, and consumer behaviour. In many cases, repair may not be the most suitable or sustainable option for a specific product.

5.4 Requirements on fibre fragmentation

We disagree with defining an ecodesign requirement on fibre fragmentation at this stage for the following reasons:

- There is currently no standardised methodology to measure, characterise and quantify fibre fragmentation across all life cycle stages (production, use, end-of-life) and

environmental compartments (air, water, soil). Existing approaches remain fragmented and do not provide a robust basis for comparable **final** product-level assessments.

- Significant scientific uncertainties remain regarding the environmental impacts of fibre fragmentation, including toxicity, biodegradability, sources of release and shedding rates. While most research has focused on waterborne releases, important knowledge gaps persist regarding emissions to air and soil, limiting the understanding of overall environmental impacts.
- Given that all fibres shed, and considering the diversity of fibre types, shedding behaviours and environmental persistence, further scientific evidence is needed to support comparable environmental assessments and effective mitigation measures. As acknowledged by the JRC, most available research focuses on microplastics, highlighting the need to expand the evidence base to all fibre types to support future policy development.
- Significant methodological limitations remain regarding biodegradability assessments. Biodegradability depends on environmental conditions, biological activity, timeframe and material characteristics, including textile treatments and finishes. In the absence of harmonised definitions, degradation endpoints and test conditions, results remain ambiguous and non-comparable.

Against this background, and as acknowledged by the JRC, additional scientific and methodological work is needed before meaningful and comparable fibre fragmentation ecodesign requirements can be established for textile products. Priority should therefore be given to developing harmonised measurement methodologies for final products, improving understanding of environmental impacts across all fibre types, and addressing existing knowledge gaps on biodegradability, toxicity and release pathways. Such an approach would provide a more robust scientific basis for future policy measures and ensure that any requirements effectively reflect real-world performance while maintaining proportionality, technical feasibility, and legal certainty for economic operators.

Annex: Considerations

This position paper is a living document. The sections here below are current discussions that EuroCommerce ESPR Textiles WG is having and, thus no positions can be drawn yet.

1. Fibre attributes content information

- We support the establishment of **information requirements on the use of sustainable fibres in apparel product**.
- Information about fibres attributes should be allowed when **intermediate traceability checks are available**.
- **Relying on credible standards** for the certification of materials with sustainability attributes is **essential**.

1.1. Proposal for a pre-defined list of fibres based on their sustainable attributes

- *We support the establishment of **information requirements on the use of sustainable fibres in apparel products***

To provide companies with safe avenues and legal certainty to communicate on fibres with certain sustainability attributes, we recommend establishing **information requirements based on a pre-defined list of eligible fibres, categorised by attributes**, to be communicated via the digital product passport (DPP). This precise list should be developed in close collaboration with industry stakeholders and be grounded in transparent, verifiable criteria. Importantly, information provisions must be aligned with the future revision of the Textile Labelling Regulation (TLR).

The list should include only **fibres that meet the following conditions**:

- The fibre is certified under an industry-wide standard recognized as reflecting best environmental practices;
- The standard includes a system to verify the fibre content in the final product;
- The standard aligns with the ISEAL Codes of Good Practice.

Based on this, we propose to define, at least, the following attributes and their corresponding fibres/standards to be included as communicable fibre under the DPP.

Table 1 - proposal for Fibre attributes and corresponding Fibre/standard

FIBRE ATTRIBUTE	ELIGIBLE FIBRE/STANDARDS
RECYCLED FIBRES	Global Recycled Standard (GRS), Recycled Content Standard (RCS), International Sustainability and Carbon Certification (ISCC) ¹
ORGANIC FIBRES	Global Organic Textile Standard (GOTS), Organic Content Standard (OCS)

¹ ISCC eligibility limited to scalable innovation fibres with recycled content.

RESPONSIBLY GROWN FIBRES	Responsible Wool Standard (RWS), Responsible Down Standard (RDS)
PREFERRED CELLULOSIC FIBRES	EU Best Available Techniques (EU BAT), The Canopy Hot Button
EUROPEAN FLAX	European Flax

1.2. Enabling timely communication based on intermediate traceability

- *Information about fibres attributes should be allowed when **intermediate traceability checks are available**.*

The verification procedures under fibre standards often require significant time for the issuance of final product traceability checks (TCs). As a result, **companies are frequently unable to communicate sustainability attributes at the time a product is placed on the market**, thereby limiting consumer awareness and informed decision-making.

As previously noted, fibre standards should be grounded in clear and precise criteria for calculating and verifying fibre content in the final product. However, under current widely adopted industry standards based on **Chain of Custody systems, delays in the final product traceability certification are common**—hindering timely communication of sustainability claims.

Given the limitations of the Chain of Custody model and the need to balance reasonable compliance with enabling consumer access to sustainability information, **we propose that communication on fibre attributes be allowed once intermediate TCs are available**.

To ensure reliable, scalable, and operational traceability throughout the supply chain, it is critical to recognize both standard-defined traceability systems and their integration with retailers' own traceability procedures and tools. This integrated approach will ensure fibre traceability from source to finished product.

1.3. Standards are crucial to lead sustainability in the textile sector

- ***Relying on credible standards for the certification of materials with sustainability attributes is essential** to support meaningful and verifiable information requirements*

Advancing sustainability in the textile sector should be based on a combination of privately held standards and effective public policy. However, significant variations remain in both the quality and scope of existing standards and certifications. Even the most robust systems are not foolproof in preventing negative impacts on people and nature.

We therefore underscore the importance of **relying on credible standards for the certification of materials with certain sustainability attributes linked to potential information requirements** under ESPR.

In this context, we recommend, for instance, relying on standards that meet the International Social and Environmental Accreditation Labelling Alliance (ISEAL) Code of Good Practice for Sustainability Systems². This Code outlines how standards should be developed, structured,

² For more information, please see: <https://www.isealliance.org/defining-credible-practice/iseal-code-good-practice>

governed and improved over time. It includes key principles such as independent verification, multi-stakeholder consultation and decision-making, and ensuring standards contain clear requirements that can be measured and assessed.

2. Maintenance information

- *Consumer behaviour during use and care of apparel products significantly influences their lifespan. **Complementary maintenance information, to care labels under TLR, should be provided through the DPP.***

Maintenance of apparel products is interlinked with durability, as acknowledged in the durability definition³ included in the ESPR. **Consumer behaviour during the use and care of products significantly influences their lifespan.** Consumers have an active role to play in a more circular economy—not only through purchasing decisions, but also when it comes to the use, maintenance, repair and reuse of products.

Clear information at the product level is key. **Care instructions** to help consumers maintain their apparel should be displayed **in the form of easily understandable harmonised graphic symbols on the physical care labels** as per the revision of the TLR. However, to ensure meaningful change in consumer behaviour, harmonisation is needed to facilitate sector compliance and reduce the administrative burden, particularly for those with a global presence.

Therefore, we propose that **complementary maintenance information be provided through the DPP**. This would serve as a central, digital source of extended care guidance for consumers.

Expanded digital information—such as links to company websites—should **complement**, not replace, the care symbols on physical labels. This information could take the form of **guidelines, visual snapshots, videos**, or a **legend explaining the graphic symbols**, helping consumers better understand and apply recommended care practices.

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EuroCommerce is the principal European organisation representing the retail and wholesale sector. It embraces national associations in 27 countries and 5 million companies, including leading global players and many small businesses. Over a billion times a day, retailers and wholesalers distribute goods and provide an essential service to millions of businesses and individual customers. The sector generates 1 in 7 jobs, offering a varied career to 26 million Europeans, many of them young people. It also supports millions of further jobs throughout the supply chain, from small local suppliers to international businesses. EuroCommerce is the recognised European social partner for the retail and wholesale sector.

³ Durability means the ability of a product to maintain over time its function and performance under specified conditions of use, maintenance and repair.