

## Digital Product Passport for Apparel Textiles

### EXECUTIVE SUMMARY

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EuroCommerce supports the objectives of the Ecodesign for Sustainable Products Regulation (ESPR), namely improving product sustainability, advancing the circular economy and empowering market actors through better access to product information. We recognise the potential of the Digital Product Passport (DPP) to facilitate access to relevant sustainability and compliance information throughout the value chain. However, the effectiveness of the DPP will ultimately depend on its ability to remain focused, proportionate and aligned with clearly defined policy objectives.

The DPP should remain a **targeted product-information tool**, rather than a broad repository for product-related data and compliance documentation. We therefore call for a **necessity- and evidence-based approach**, whereby each mandatory data point is linked to a clearly identified use case and delivers demonstrable added value. The DPP should not become an end in itself, but rather a means of addressing specific market failures and sustainability challenges.

The principle of **proportionality and scalability** must underpin the design and implementation of the DPP, ensuring that it can be implemented effectively across a textile sector characterised by complex international supply chains. The regulatory burden imposed on economic operators should be commensurate with the environmental and circularity benefits expected from the system. Particular attention should be paid to small and medium-sized enterprises (SMEs), which may face significant challenges in adapting IT systems, collecting data from complex supply chains, maintaining cybersecurity safeguards and ensuring data quality over time. Compliance costs should not undermine business competitiveness or create barriers to market participation.

A key concern is the risk of **regulatory overreach and excessive complexity**. The DPP framework appears to be moving beyond the original ESPR and Joint Research Centre (JRC) concepts through the progressive expansion of mandatory information requirements and access rights. Such an expansion risks generating significant administrative burdens without delivering commensurate environmental benefits and demonstrable, understandable value for consumers. We therefore call for a disciplined approach to data selection, ensuring that only information that is necessary, actionable and relevant to clearly defined policy objectives is included.

We also emphasise the importance of **building on existing legislative and industry frameworks**. Where information obligations already exist under EU legislation—such as the Textile Labelling Regulation, REACH, consumer protection legislation, customs legislation or recognised certification schemes—the DPP should build upon these frameworks rather than duplicate them. This would improve regulatory coherence, reduce compliance costs and minimise legal uncertainty. In this regard, the **DPP should complement existing systems rather than create parallel reporting obligations**.

A central operational recommendation concerns **data granularity**. EuroCommerce strongly advocates for a **model-level approach as the default principle** for textile products. Most sustainability, chemical, durability and compliance information is generated, verified and managed at model level, making this

the most practical and cost-effective approach. By contrast, batch-level and item-level requirements would be disproportionate, difficult to implement and of limited additional value. Such granular approaches would significantly increase operational complexity while providing little benefit in terms of traceability, sustainability assessment or market surveillance.

We further advocate for a **technology-neutral approach** to implementation. The DPP should not prescribe specific technological solutions, such as QR codes, RFID tags or dedicated applications. Instead, economic operators should retain the flexibility to choose the technologies most appropriate to their products, business models and distribution channels. Such flexibility would support innovation while avoiding dependence on technologies that may become obsolete.

Data governance and access rights constitute another important consideration. EuroCommerce supports a **need-to-know principle**, ensuring that stakeholders have access only to information relevant to their legitimate role and purpose. Public access should be limited to information that supports informed consumer decision-making, while sensitive technical, commercial or compliance-related information should remain accessible only to competent authorities. Such an approach would help balance transparency objectives with the protection of confidential business information, cybersecurity considerations and intellectual property rights.

Finally, we underline that the success of the DPP will depend on maintaining an appropriate balance between **environmental ambition and practical feasibility**. While recognising the potential benefits of improved data availability, enhanced traceability and better sustainability information, these benefits should not be assumed automatically. The design of the DPP must be guided by evidence-based policymaking, robust cost-benefit analysis and genuine operational needs across the value chain. Ultimately, the DPP should remain necessary, proportionate, interoperable, technology-neutral and aligned with existing legislation, while delivering tangible environmental benefits without imposing unnecessary burdens on businesses.

## FULL POSITION

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### 1. PRODUCT IDENTIFICATION AT MODEL-LEVEL

EuroCommerce strongly advocates for a **model-level approach as the default identification principle** for textile and apparel products.

Most sustainability, durability, chemical and compliance-related information is generated, verified and managed at model-level. Linking DPP information to a model identifier therefore provides an appropriate balance between traceability, operational feasibility, scalability and regulatory effectiveness.

This approach is also consistent with the conclusions of the CIRPASS-2 project, which identifies model-level identification as the most operationally feasible solution for textile products and recognises that more granular approaches substantially increase implementation complexity while delivering only limited additional value.

A single identifier can be applied across all units of a given product model, simplifying the issuance and management of data carriers and aligning with existing industry practices for product identification and labelling. This approach avoids the need for complex serialization systems and minimises the administrative and technical burden on economic operators, particularly SMEs. In addition, model-level identifiers are **fully compatible with current production and distribution practices**, where labels and identifiers are often produced in advance and applied across different production sites and batches.

Similarly, the JRC recognises that item-level implementation exhibits the lowest level of readiness within the textile sector, given that product serialisation is not common industry practice and would require substantial investments in product marking, data management, and systems integration.

By contrast, mandatory batch-level or item-level identification requirements to be disproportionate and of limited added value for most textile products:

- The definition and use of batches vary considerably across operators and supply chains, limiting the potential for harmonised implementation; furthermore, labelling often takes place prior to finalised production parameters.
- Item-level serialisation would require substantial investments in data management systems, labelling solutions and operational processes, while delivering limited benefits for the majority of proposed DPP use cases. Such requirements would be particularly burdensome for SMEs and could create significant implementation costs without a clear environmental or market-surveillance justification.

We also stress that product identification requirements should **avoid duplication with existing regulatory systems**. Information such as customs commodity codes, for instance, already serves specific purposes under customs legislation and is intended to be managed through the EU customs infrastructure. Requiring such information to be systematically incorporated into the DPP before the DPP Registry and the EU Customs Data Hub are fully interoperable would duplicate existing regulatory systems without delivering clear operational benefits. Such information should remain within the customs system until interoperability between both infrastructures is fully established.

Ultimately, product identification should facilitate efficient data exchange, interoperability and compliance while minimising administrative burdens. A model-level identification approach represents the most practical, scalable and cost-effective solution for achieving these objectives in the textile and apparel sector.

Lastly, existing industry identification standards, including GS1-based identification systems, already provide robust and widely implemented solutions that can support DPP implementation while ensuring interoperability across value chains and markets.

## 2. PRODUCER IDENTIFICATION AT MODEL-LEVEL

Information regarding the responsible economic operator should be linked to the **product model**. The identity and compliance responsibilities of manufacturers, importers and other economic operators are typically established at model level, and extending these obligations to batch-level disclosure would create unnecessary complexity without providing meaningful additional benefits for traceability or market surveillance.

We are particularly cautious regarding the JRC proposal to require the disclosure of detailed **manufacturing facility information** through the DPP. While supply-chain transparency can support certain policy objectives, mandatory disclosure of facility-level data may raise significant concerns relating to commercial confidentiality and the legitimate business interests. In highly competitive global supply chains, production facilities often form part of strategic sourcing arrangements, and public disclosure requirements could inadvertently expose commercially sensitive information.

Where facility-related information is deemed necessary for enforcement purposes, EuroCommerce supports a **targeted access approach**, whereby relevant authorities can access the information required to fulfil their regulatory responsibilities. This would preserve the effectiveness of market surveillance and compliance activities while avoiding unnecessary public disclosure of sensitive business information.

### 3. PRODUCT INFORMATION AT MODEL-LEVEL

In light of the arguments presented above, we strongly advocate for **model-level granularity for mandatory information requirements**, as it strikes the right balance between data availability, reliability, scalability and cost-efficiency, as it aligns with existing industry systems and labelling practices.

#### Robustness

We strongly support the inclusion of **robustness information** in the DPP, as it is one of the most relevant and valuable sustainability indicators for textile and apparel products. Nevertheless, its implementation should remain **proportionate, focused on end-user needs** and based on **harmonised methodologies**.

The objective should be to provide clear and credible information that supports sustainable consumption and product longevity. To this end, robustness performance should be communicated through a **simple score, rating or performance class**, providing a clear indication of a product's performance without requiring consumers to interpret highly technical information.

The disclosure of detailed testing data, individual laboratory results or technical performance parameters through the DPP, by contrast, would not provide added value to consumers and may instead lead to confusion, information overload and misinterpretation. The primary objective should be to communicate the outcome of robustness assessments rather than the underlying technical methodology. A simplified performance indicator would therefore be more effective in supporting consumer understanding and comparability across products.

From a compliance perspective, we support the use of **existing conformity assessment mechanisms** and consider that supporting documentation should be made available to competent authorities upon request, in line with established regulatory practices. The DPP should communicate robustness performance to relevant stakeholders rather than serve as a repository for underlying testing and certification documentation.

#### Recycled content

Recycled content information represents one of the most relevant and practical sustainability indicators that can be included in the DPP. Its implementation should, however, remain **proportionate, based on existing verification mechanisms** and focused on providing clear, reliable information that supports informed decision-making by stakeholders.

Information should be disclosed in **percentage of recycled content** contained in a product, as this represents a clear, understandable and verifiable metric. By contrast, requirements to disclose the absolute weight or quantity of recycled material would add complexity without demonstrating a clear policy benefit. Percentage-based information is sufficient to support consumer information, market surveillance and compliance activities, while remaining aligned with established industry practices.

We also do not support requirements to disclose the **origin of recycled content**, such as distinguishing between post-consumer and pre-consumer (industrial) recycled materials. Its value for consumers remains unclear and their implementation can be challenging in complex supply chains where materials are frequently blended and sourced through multiple recycling streams.

From a compliance perspective, recycled content claims should build upon **existing certification and chain-of-custody systems**, which already provide recognised and reliable mechanisms for verification. The DPP should complement these systems rather than create additional reporting or certification

obligations. Existing certification frameworks are generally designed around material flows and product models, further supporting a model-level approach to data collection and disclosure.

## Substances of concern

Information on **substances of concern (SoCs)** can play an important role in supporting regulatory compliance and market surveillance activities. However, the inclusion of such information in the DPP should be guided by the principles of **necessity, proportionality and relevance to the intended users**. Any requirements should be carefully assessed against their contribution to the objectives of the ESPR and should avoid creating unnecessary complexity or duplication with existing chemicals legislation.

In particular, the DPP should not seek to replicate the information and communication obligations already established under frameworks such as REACH and other relevant EU chemicals legislation. Instead, it should **complement existing requirements** and facilitate access to information where there is a clearly demonstrated regulatory need. Regulatory coherence is essential to avoid overlapping obligations, inconsistent reporting requirements and unnecessary costs for economic operators.

We have strong reservations regarding the disclosure of detailed information on the **identity, concentration or precise location of substances of concern** within a product. Such information is highly technical and unlikely to be meaningful or actionable for consumers. Without appropriate context, it may be misinterpreted, creating confusion rather than enabling informed decision-making. The mere presence of a substance does not necessarily indicate a risk, as safety considerations depend on factors such as concentration, exposure pathways and intended use.

Moreover, requirements to disclose detailed chemical information would raise **significant practical challenges**. Verification and maintenance of such data can be resource-intensive, particularly for complex supply chains involving multiple suppliers and production stages.

Therefore, information relating to SoC should be subject to a **targeted access framework based on the need-to-know principle**. Access to detailed chemical information should primarily be granted to competent authorities and other actors with clearly defined regulatory responsibilities. This would allow market surveillance and enforcement authorities to fulfil their obligations effectively while ensuring that sensitive technical information is handled appropriately.

Any approach to SoC should also take into account the need to protect **confidential business information and commercially sensitive data**. The DPP must strike an appropriate balance between transparency objectives and the legitimate interests of economic operators.

## Not necessary data points

While the DPP should support the objectives of the ESPR by making relevant sustainability information accessible across the value chain, **not every data point currently under JRC's consideration demonstrates a clear use case, added value or proportionality**. In line with the principles of necessity and evidence-based policymaking, information requirements should only be introduced where they contribute directly to a defined regulatory objective and can be effectively used by relevant stakeholders.

In this context, we have significant reservations regarding the inclusion of certain data categories, namely **end-of-life information, material information and organic content**, where the benefits remain unclear, existing legislative frameworks already provide for information disclosure, or the proposed requirements would generate disproportionate administrative burdens.

## End-of-life information

We do not consider broad end-of-life information requirements to be justified for textile and apparel products. There is currently limited evidence that detailed end-of-life information provided through the DPP would be systematically used by waste operators, sorters or recyclers in practice.

Textile sorting and recycling processes today rely predominantly on manual assessment, mechanical sorting technologies and established operational procedures rather than on information retrieved from product labels or digital databases. As a result, the practical value of extensive end-of-life data for downstream operators remains uncertain.

Furthermore, maintaining accurate end-of-life information throughout a product's lifecycle would create significant costs and governance challenges. Product characteristics, usage patterns and market conditions may change over time, making it difficult to ensure that information remains relevant and up to date. Such requirements could therefore generate substantial administrative burdens without delivering commensurate environmental benefits.

## Material information

We do not support introducing extensive material information requirements through the DPP where such information is already addressed under the Textile Labelling Regulation, which provides a well-established and harmonised framework for communicating material composition to consumers. The DPP should build on this framework rather than duplicate existing obligations.

Additional material-level reporting requirements would risk creating overlapping information systems, increasing compliance costs and generating legal uncertainty regarding the relationship between different legislative instruments.

## Organic content

We remain unconvinced that organic content should constitute a mandatory data point within the DPP framework, as its contribution to the objectives of the ESPR has not been clearly demonstrated.

Where organic content is communicated, percentage-based information is generally sufficient and consistent with existing market practices. Requirements to disclose the absolute quantity or weight of organic material would add complexity without providing meaningful additional value for consumers, authorities or economic operators.

Similarly, batch-level reporting and certification requirements for organic content would be disproportionate and difficult to implement in complex textile supply chains. Existing certification and chain-of-custody systems already provide mechanisms for verifying organic claims where such verification is required.

The DPP should not duplicate information already communicated through established certification schemes or voluntary sustainability labels, unless a clear regulatory rationale and stakeholder need can be demonstrated.

## Access rights

Access rights are a key component of the DPP and should be governed by a **need-to-know principle**, ensuring that stakeholders only have access to information that is relevant to their specific role and purpose. Different categories of users, including consumers, economic operators and competent authorities, have different information needs, and access levels should reflect these differences.

Public access should be limited to information that supports informed consumer decision-making and can be easily understood. By contrast, sensitive technical, commercial or compliance-related information should remain accessible only to competent authorities and other authorised actors where there is a clearly justified need.

More broadly, the DPP should strike an appropriate balance between transparency and the protection of **confidential business information, intellectual property rights and cybersecurity interests**. Access requirements should be based on necessity, proportionality and clearly defined use cases, ensuring that the right information is available to the right stakeholders for the right purpose.

#### 4. THE DPP SHOULD NOT BECOME A DOCUMENTATION REPOSITORY

The ESPR positions the DPP as a tool designed to ensure that product-related information is electronically accessible, searchable, and interoperable. While Annex III provides categories of information that may be specified through delegated acts, it does not imply that the DPP should function as a comprehensive repository containing all supporting technical documentation by default.

In this context, a clear distinction should be maintained between:

- i. *compliance information*, such as declarations of conformity, compliance status, certificates, and references to applicable legislation and standards; and
- ii. *compliance documentation*, such as technical documentation, laboratory reports, testing evidence, calculation methodologies, parameters, and underlying datasets.

Supporting documentation should be made available to competent authorities upon request through established conformity assessment, customs, and market surveillance procedures, where verification is necessary.

This approach aligns with the principle of proportionality underpinning the ESPR and helps avoid unnecessary administrative burdens. It also reflects the broader principles of the New Legislative Framework, in particular Decision No 768/2008/EC, under which compliance is typically demonstrated through EU declarations of conformity, supported by technical documentation maintained by the manufacturer. Verification is subsequently performed by competent authorities through market surveillance and other risk-based, ex post control mechanisms.

Requiring the systematic inclusion of all supporting evidence within the DPP would constitute a significant shift away from established EU product legislation. Across a range of frameworks—including systems based on declarations of conformity as well as initiatives such as the EUDR, CBAM, Batteries Regulation, Construction Products Regulation and PPWR—economic operators are responsible for retaining documentation and providing it upon request. The introduction of the DPP should not alter this longstanding allocation of responsibilities.

## Conclusion

EuroCommerce strongly advocates for a DPP that is **necessary, proportionate, interoperable, technology-neutral, aligned with existing legislation, and focused on delivering tangible sustainability outcomes rather than expanding reporting obligations**.

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