



Priorities for a successful revision of Textile Labelling

ECOS comments to the policy options for the revision of the Textile Labelling Regulation

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Main drivers for the revision of the Textile Labelling

The EU Regulation on Textile Labelling was adopted in 2011 and it is high time that it is revised and updated due to the increasing negative impacts of the textile sector, a growing consumer awareness of such impact, a rise in greenwashing as well as scientific and technological developments.

Increasing negative impact of the textile sector and growing consumer awareness

The textile sector is short-term, linear, and heavily reliant on fossil fuels. Textile production causes air, water, and soil pollution, driving climate change, biodiversity loss, and damage to ecosystems and human health.^{1,2} Carbon emissions and the use of primary resources are projected to rise further as the textile industry plans for growth directly linked to the production of more new units every year.^{3,4} Human and labour rights violations, as well as hazards for the health and safety of workers, are a reality in the textile value chain. A study by the European Commission⁵ showed that approximately 82% of 27 498 survey respondents believe that there is insufficient information available regarding environmental aspects and working conditions associated with apparel. **It is of crucial importance that consumers receive more information on the environmental and social impact of textile products.** That information allows consumers to make informed decisions about the products they wish to buy and will support keeping companies accountable for their value chain.

Rise in greenwashing in labels - false, unclear, misleading or otherwise not well-substantiated information provided in labels regarding environmental sustainability

In 2021, the European Commission and national consumer authorities released the results of a screening of websites for greenwashing, including websites of textile companies. Authorities found that in 42% of cases, the claims were exaggerated, false or deceptive and could potentially qualify as unfair commercial practices under EU rules.⁶ The Commission recognized that greenwashing had increased. The wild west of green claims needs to be addressed. The new Empowering Consumers and Substantiating Green Claims Directive and will hopefully contribute

¹ European Topic Centre Waste and Materials in a Green Economy (2019). Textiles and the environment in a circular economy. <https://www.eionet.europa.eu/etcs/etc-wmge/products/etc-wmge-reports/textiles-and-the-environment-in-a-circular-economy>

² United Nations Environment Programme (2023). Sustainability and Circularity in the Textile Value Chain – A Global Roadmap. Paris <https://www.unep.org/resources/publication/sustainability-and-circularity-textile-value-chain-global-roadmap>

³ Textile Exchange (2024). Materials Market Report 2024 <https://textileexchange.org/knowledge-center/reports/materials-market-report-2024/>

⁴ McKinsey & Global Fashion Agenda (2020). Fashion for Climate: How the fashion industry can urgently act to reduce its greenhouse gas emissions. <https://www.mckinsey.com/industries/retail/our-insights/fashion-on-climate>

⁵ European Commission. 2019. Special Eurobarometer 501 - Attitudes of European citizens towards the environment. Environment. doi: 10.2779/902489

⁶ https://ec.europa.eu/commission/presscorner/detail/en/ip_21_269

to putting the brakes on unchecked environmental claims. It is crucial that the Textile Labelling Regulation is coherent and contributes to fighting greenwashing on textile labels.

Availability of digital labelling technologies and of technologies enhancing traceability and transparency of the value chains

With the availability of digital technologies, the amount of information companies need to disclose will not be limited by the dimension of a physical label. Yet, it is important to ensure that certain essential information will still be present on the **physical label, such as fibre composition, sizes, care instructions, and microplastic and chemicals warnings.**

Currently, the Textile Labelling Regulation does not foresee an obligation to disclose where the textile product was finally assembled, yet the **“made in” labelling is present on many labels.** With the advancement of traceability technologies, traceability and transparency of the textile value chain need to advance and become mandatory, starting with the factory location of where the product was assembled up till the location of farms.

Policy options

Scope of the Textile Labelling Regulation should be expanded

We are in favour of revising the scope of the Textile Labelling Regulation to require information on all non-textile parts, of either animal origin or not (including rubber and plastic) and their location in the textile product. Having a sound set of rules on leather and fur authenticity, requiring animal species identification, will increase consumer information and environmental awareness. Consumers will be able to make more informed decisions.

All textile products should display a physical and digital label

All textile products put on the market should display a physical label with essential information on the product, together with a digital label that provides more in-depth information on the product itself and its production process. Hence, we support policy option 3 insofar as it foresees the **introduction of the digital label for all textile products**, not just the ones for which ecodesign requirements have been adopted. Otherwise, besides creating an uneven level-playing field, the risk is that detailed information on care, repair, allergenic substances, and – hopefully – other harmful chemicals will not be provided for products such as bedsheets, carpets or other home textiles.

A minimum level of circularity and sustainability information must be provided regardless of ecodesign

We are seriously concerned that the Commission proposes to limit circularity and sustainability information to only the products for which ecodesign requirements have been adopted. Depending on the Ecodesign Workplan and resources allocated to this policy, the scope of the products displaying circularity and sustainability information could vary considerably. To this date, only apparel would be included; home and technical textiles would not display any circularity and

sustainability information. This does not meet the vision and ambition set in the **EU Strategy for Sustainable and Circular Textiles**, which clearly stated that, as part of the revision of the Textile Labelling Regulation, the Commission would have introduced mandatory disclosure of other types of information, such as sustainability and circularity parameters.

We urge the Commission to reconsider this position and introduce a **minimum set of sustainability and circularity information that any textile product should display**, regardless of ecodesign measures. For example, to inform buying decisions, all products made of more than 50% synthetic materials should display a **mandatory microplastics warning pictogram**, similar to the Single Use Plastic marking. The pictogram should highlight the presence of plastic in textile products and the health and environmental impacts of microplastics. The introduction of the pictogram **would not require the development of any new methodology**, since its inclusion would only depend on the fibre composition of the product. Microplastics do not only shed from apparel; this information is highly relevant for any textile product.

In addition to the microplastics pictogram, we believe that some key sustainability labelling should also be foreseen on the physical label.

Information on allergenic substances, endocrine disruptors and other substances should be mandatory

The inclusion of information on **allergenic substances** is a very positive step. Nonetheless, if this is to be linked with REACH, we are concerned about the slowness of the skin sensitiser restrictions. **ECHA's committees backed restricting more than thousands skin sensitising chemicals used in clothing and other articles back in September 2020; however, no decision has been adopted yet.**

Furthermore, we would like to see **endocrine disruptors** being disclosed in the digital label. Test conducted by Arnika, dTest, and consumer associations from Hungary, Austria, and Slovenia have recently found that one in three underwear products they tested contained **bisphenol**, a substance that, even at low levels, interferes with the normal functioning of the hormone system.⁷

In addition to allergenic substances and endocrine disruptors, we encourage the Commission to require information on all hazardous substances that may be released from textiles during their life cycle. We need disclosure of **all substances of very high concern (SVHCs); carcinogens, mutagens and reprotoxic substances (CMRs); per- and polyfluoroalkyl substances (PFAS); heavy metals; neurotoxins; flame retardants (halogenated compounds); alkylphenols; and phthalates; clear indication on biocides used in textiles.** The revision of the Textile Labelling Regulation and the introduction of ecodesign requirements should support full chemical traceability, both in terms of chemicals used during the manufacturing process as well as chemicals that are present on the product.

⁷ <https://arnika.org/en/news/toxic-chemicals-in-underwear-women-are-a-high-risk-group-when-looking-for-bisphenols-in-textiles>

Precise sizes should be mandatory on the physical label

We are very happy to see that the Commission is considering **mandatory labelling on precise sizes**. Different or unprecise clothing measurement systems confuse consumers with the risk of clothes not being used for long due to poor fit. To avoid returns, this is especially relevant in the case of distant sales, for which consumers cannot try on the clothes before the purchase. **Literature shows poor fit is one of the three main end-of-life reasons for clothes**. Furthermore, precise measurements of clothes will allow for a better movement of second-hand clothes within the EU, where classes of sizes are not harmonized. That is why it is important to **display the information on the label** and not only on the website when purchasing products online.

Mandatory origin of the product and production date

We also welcome the possible introduction of rules on the origin of the product ("**made in**" label). Unclear criteria and rules in this space have created confusion on the actual validity and value of such labelling. **"Made in" labels need to be made mandatory for all textiles**. However, such information should not just be limited to the country where the product was assembled. It is key to mandate information on **factory locations at different tiers where raw materials were produced and processed, where dyeing, printing, finishing, and confectioning took place as well as farm locations**. It is time to ensure full traceability of the textile value chains. Furthermore, a textile product shall be deemed to originate in the EU only if it underwent at least three of the key stages of manufacture within the Union, with proofs – the so-called "yarn-forward" rule applied for instance as a general rule in the NAFTA.

Production date and volumes and information on the size of the products' batch should also be included, to facilitate transparency and data collection during waste audits on production volumes, the frequency of collection renewals, and the rate of product discard. Information on which products are used for the shortest periods of time can also inform the setting of eco-modulation criteria as part of EPR schemes.

A broad understanding of mandatory care instructions

Currently, consumers receive only a limited amount of care information, mainly focused on how to wash/iron/dry the textile product. The nature of care labelling is voluntary, and the pictograms used are registered trademarks in most countries. Other aspects of care information are provided voluntarily in very limited cases. Clear care instructions would benefit the product with a longer lifetime. We welcome that the Commission plans to **make care instruction mandatory**. We encourage to provide essential information on the physical label and to require further information on the digital label. Furthermore, we welcome that the Commission is considering a **broad concept of "care"**. Consumers will benefit, for instance, from information explaining the various options they have if the product needs to be **repaired** or if they do not use their products anymore and want to give them a **second chance** in someone else's wardrobe. This will also support social enterprises in the EU, which are vital in textile waste management. Instruction on properly **sorting and on how to manage the products at their end-of-life** would also help the EU achieve targets for the separate collection of textile waste.

Calculation and disclosure of recycled content

To avoid any greenwashing, we urge the Commission to require companies to disclose the **amount of recycled content present in the product and the origin of inputs, whether it comes from textile waste and pre- or post-consumer waste**. Recycled content coming from fibre-to-fibre recycling should be rewarded and clearly identified, contrary to recycled content coming from plastic bottles. Proof should be provided for the recycled content. **To calculate its amount, the Commission should only allow segregation as chain of custody model.**

Safeguards should be introduced to claim the increased tolerance level for inclusion of recycled materials

The calculation of precise recycled content that is present in the product is instrumental for the tolerance level for mechanically recycled content that the Commission put forward. **We welcome that the Commission decided not to propose any other increase of tolerance levels.** The accuracy of the fibre composition is already questionable and the solution cannot just be raising tolerance levels. The Commission proposes an ad-hoc increased tolerance margin when mechanically recycled fibres are included in the product due to impurities. While we understand the aim of the Commission, we also want to caution against abuses of this provision. We propose a **minimum amount of recycled content to be included in the product to be able to claim an additional tolerance margin of 5%.** Otherwise, companies could claim the application of this tolerance by adding just a very small amount of recycled content. Therefore, it will be necessary for companies to provide accurate information on the amount of recycled content present in the product and the origin of inputs included, with proof. To make use of this tolerance, only a **segregation** approach should be allowed to calculate the amount of recycled content in the product, while mass balance approaches should not be allowed.

Fibres with different properties and environmental performance should not be grouped under a same name without further specification

We would like to caution against the use of generic names without specifying subcategories. **Generic categories might be too broad and include fibres that present different physical properties.** For example, cellulosic materials have different characteristics and that could impact the dyeability, slip and electrostatic properties, with differences in appropriate applications, processing and handling methods. Furthermore, different man-made cellulosic fibres have also different environmental performance and consumers may be interested in choosing the best performing ones. Furthermore, the classification of cotton, which is also a cellulosic fibre, would be unclear and we believe should not be grouped together with other man-made cellulosic fibres.

Discussions in ISO and CEN are ongoing on EN ISO 2076:2021. As a working method, we do not recommend to blindly endorse a standard on which discussions are still ongoing. If standards are to be used, we suggest adopting a **standardisation request** where the EU will detail their specific legislative needs and potentially ask for an update of such standard. The EU could then finally adopt it as a harmonised standard if all the requirements set in the standardisation request are met.

Mandatory information on social impacts

We are deeply concerned that information on social impacts is currently not considered among the policy options. Human and labour rights violations are a reality in the textile value chain. Social considerations are a vital aspect of the concept of sustainability, which is currently being overlooked when assessing the need to display information on the sustainability of textile products. Consumers and civil society need to be able to retrieve information on human and labour rights records, including information on unionisation, working conditions and remuneration, as well as health and safety standards and the location of the factories involved in the production of the products they purchase. That information allows consumers to make informed decisions about the products they wish to buy and will support keeping companies accountable for their value chain.