

High time to revise the EU Textile Labelling Regulation

ECOS priorities for a legislative revision of the EU Textile Labelling Regulation

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Our recommendations at a glance

Overall

- Extend the scope to require information on all non-textile components, including plastics, rubber, metals, and animal-derived materials, together with their location in the product, to support informed consumer choice and high-quality recycling.

Physical label

- Allow any **additional fibre tolerance** (up to 5%) for mechanically recycled content **only where a minimum recycled content threshold is met** and the exact recycled content and origin are disclosed. Mass balance approaches should not be permitted for fibre composition claims.
- Introduce **mandatory precise measurement of sizes**, based on existing ISO standards.
- Make **care instructions mandatory**, using an expanded concept of care covering washing, drying, ironing, repair, and end-of-life sorting and managing.
- Require **“made in” information specifying the countries of key manufacturing stages**.
- Provide **consumer-relevant information on substances of concern**, including allergenic substances and endocrine disruptors relevant for skin contact.
- Introduce a **minimum set of sustainability and circularity information for all textiles**, including a **microplastics pictogram** for products made fully or partly of synthetic materials.

The digital label should include:

- All circularity and sustainability information shown physically, with **additional detail and explanations**.
- **Expanded size, care, repair, reuse, and end-of-life sorting and managing guidance**.
- **Traceability information on factory locations** at different tiers where raw materials were produced and processed, and where dyeing, printing, finishing, and confectioning took place.
- **Production data** including date, batch size, and volumes to support waste audits, market surveillance, and extended producer responsibility eco-modulation.
- **Verified information on social impacts and due diligence processes including** information on unionisation, working conditions, remuneration, health and safety standards, and the location of the factories involved in the production of the products they purchase.

The Textile Labelling Regulation needs a legislative revision

ECOS strongly supports a legislative revision of the EU Regulation on Textile Labelling.ⁱ The Regulation was adopted 15 years ago, in 2011, and it is high time to update it.

Since then, the textile sector has remained linear - causing air, water, and soil pollution, and driving climate change, biodiversity loss, and damage to ecosystems.¹ Consumers are increasingly aware of such impacts, and want to make sustainable choices, but they face a serious amount of exaggerated, false, or deceptive claims (including some that could potentially qualify as unfair commercial practices under EU rules).² The accuracy of fibre composition has also been questioned and “made in” statements are not harmonised. It is vital to ensure consumers’ trust in the label. Technological developments have also opened new possibilities for data collection from the supply chain, as well as ways to provide information to other users and unlock more circularity potential.

ⁱ See previous ECOS publications: [Priorities for a successful revision of Textile Labelling Regulation](#) (2024) [Durable, repairable and mainstream: How ecodesign can make our textiles circular](#) (2021)

ECOS welcomes and supports the European Commission's intention to revise the Regulation, and we strongly call on the European Commission to adopt a bold proposal that will truly and effectively:

- Enable consumers to make more informed choices on the textile products that they buy.
- Strengthen consumers' trust in the label.
- Enable and support other actors of the value chain to transition to a circular economy.

Essential information on a revised physical textile 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 further in-depth information on the product itself and production processes. Essential information and information that can influence purchasing decisions should always be available physically on the textile product, or at least at the point of sale as not all consumers have reliable internet access or the devices needed to view online content. Purchasing decisions are often made within seconds; therefore retrieving information digitally for each product at the moment of purchase is time-consuming, burdensome, and may limit comparability.

Certain essential information should still be present on the physical label attached to products, to ensure that consumers have the easiest and fastest access to information, even beyond the first point of sale, i.e. when buying a second-hand product. This may also enable consumers to better care for their product if care instructions are present on the physical product label.

Information on textile and non-textile parts

We support revising the scope of the Textile Labelling Regulation to require **information on all non-textile parts**, 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 and requiring animal species identification will increase consumer information and environmental awareness. **Consumers will be able to make more informed decisions.**

Accurate fibre composition is important to enable proper and correct care and maintenance of textile products, as well as effective recycling. Correct care and maintenance of textiles may prolong their life and consequently reduce unnecessary waste. We are therefore **against any increase in tolerance levels.**ⁱⁱ The accuracy of fibre composition is already questionable,³ the solution cannot just be raising tolerance levels. The European Commission is considering an ad-hoc increased tolerance margin when mechanically recycled fibres are included in the product due to impurities. While we understand this aim, 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. The minimum content will also need to be higher than any mandatory minimum content foreseen in the context of ecodesign legislation. It will be necessary for companies to provide accurate information in the digital label on the amount of recycled content present in the product and the origin of inputs included, with proof. **To make use of this tolerance, mass balance approaches should not be allowed.**

ⁱⁱ The Textile Labelling Regulation sets specific rules for the fibre composition of textile products. It also includes provisions for tolerance levels that allow for minor deviation between the declared fibre content and the actual fibre content. A manufacturing tolerance of 3% is currently allowed, as well as a tolerance for the presence of extraneous fibres in the fibre composition. These two tolerances can be cumulated in certain cases.

Precise sizes

Textile labels shall display the **precise sizes of a textile product**, e.g. using EN ISO 8559. Different or imprecise clothing measurement systems confuse consumers, with the risk of clothes not being used for long, due to poor fit. This is especially relevant in the case of distant sales, when consumers cannot try on clothes before the purchase, with increased risks of returns. Literature shows that poor fit is one of the main end-of-life reasons for clothes.⁴ Precise measurements of clothes will also allow for the better movement of second-hand clothes within the EU, where classes of sizes are not harmonised. That is why it is important to **display the information on the label** and not only on the website when purchasing products online.

A broad understanding of mandatory care instructions

Consumers currently only receive a limited amount of care information, mainly on how to wash, iron, or dry the textile product. The nature of care labelling is voluntary and pictograms used are registered trademarks in most countries. Other aspects of care information are provided voluntarily in very limited cases. Clear care instructions would support a longer product lifetime. We encourage **making care instructions mandatory** to provide essential information on the physical label. Correct care and maintenance of textiles may prolong their life and consequently reduce unnecessary waste. We also recommend a **broad concept of “care”**. Instructions on properly **sorting and managing products at their end-of-life** would also help the EU achieve targets for the separate collection of textile waste.

Mandatory origin of the product

We call for the introduction of rules on the origin of the product (“made in” label). Unclear criteria and rules in this space have created confusion about the actual meaning of such statements. **“Made in” labels need to be made mandatory for all textiles**, specifying the countries of key manufacturing stages. This should also be valid for products that are deemed to originate in the EU, and for which strict rules of origin and traceability requirements should be set.

Circularity and sustainability information

While **circularity and sustainability information** should have a prominent, visual role in the digital label, we want to stress that ecodesign information should also be present physically on the product at the moment of sale, either on the textile label itself or a hand tag. While the latter falls outside the scope of the Textile Labelling Regulation, it is important to consider these aspects holistically.

We are seriously concerned that the European Commission proposes to limit circularity and sustainability information to only products for which ecodesign requirements have been adopted. Depending on the Ecodesign for Sustainable Products Regulation (ESPR) workplan and resources allocated to this policy, the scope of the products displaying circularity and sustainability information could vary considerably. To date, only apparel would be included, meaning that home textiles, technical textiles, and personal and protective equipment 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 states that, as part of the revision of the Textile Labelling Regulation, the European Commission would have introduced mandatory disclosure of other types of information, such as sustainability and circularity parameters.

We urge the European 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. All products made fully or partly of synthetic materials should display a **mandatory microplastics warning pictogram**, similar to the Single Use Plastic marking this would inform buying decisions, for example.

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. Introducing such requirements in the Textile Labelling Regulation, rather than in the ESPR delegated act for apparel, will ensure that consumers receive this information for any synthetic textiles, and not just clothing. Microplastics are not shed only from apparel, therefore this information is highly relevant to any textile product.

A relevant precedent was already applied in French legislation, where a similar label was introduced for textiles made of at least 50% of synthetic materials to inform users about microplastics pollution risks.⁵ A 2023 report from the Inspection générale de l'Environnement et du Développement durable, (an advisory body under the authority of the French ministry in charge of the environment), later recommended lowering such threshold of synthetic material content to 5%, stating that 50% is too high⁶. Using this as an example, a similar label could be expanded at the EU-level, under a harmonised pictogram, to prevent internal market fragmentation and ensure transparency. The precise thresholds for the synthetic fibre content necessary to trigger the obligation to affix the pictogram should be set within the range from 5% to 50%.

Allergenic substances and endocrine disruptors

Textiles, and in particular clothes, are products that consumers come in very close and prolonged contact with. It is therefore important to consider the exposure that consumers have to chemicals in clothing and textiles. We therefore recommend including information on **allergenic substances** on the textile label. While a REACH restriction on skin sensitisers had started, with ECHA's committees recommending **restricting thousands of skin sensitising chemicals used in clothing** and other articles back in September 2020, no decision has been adopted yet to this date.

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

Additional information on the digital label

We support the **introduction of the digital label for all textile products**, not just the ones for which ecodesign requirements have been adopted. Otherwise, this would not only create an uneven level-playing field, but another risk is that detailed information on care, repair, etc., will not be provided for products such as bedsheets, carpets, or other home textiles.

While the physical label will provide essential information, the digital label will enable consumers and other value chain actors to retrieve important information that may not fit within the limits of a physical label. Digital labels can have a supporting and complementary role, providing additional or more detailed information, without replacing mandatory physical labels.

Additional circularity and sustainability information

The digital label should include all the circularity and sustainability information that is present on the physical label or on a separate hand tag, and complement it with additional information and explanations that have not been included in the physical label, for instance due to size limitations. Any ESPR information requirement needs to be uploaded to the digital label.

Additional sizes, care and sorting instructions

Operators should be required to **expand sizes, care and sorting instructions** beyond what is present on the physical label. Consumers will benefit from information that explains the various options if the product needs to be repaired or if they no longer use their products 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.

Sourcing and manufacturing locations and production date

While the physical label may include information on the countries of key manufacturing stages, the information in the digital label should include information on **factory locations at different tiers where raw materials were produced and processed, where dyeing, printing, finishing, and confectioning took place**. It is time to ensure **full traceability of the textile value chains**.

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 the duration of service, 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 future ecodesign criteria and ecomodulation criteria as part of EPR schemes.

Information on social impacts

Information on social impacts shall be included in the digital label. 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. This information will allow consumers to make informed decisions about the products they wish to buy and will help keep companies accountable for their value chain.

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