



POSITION PAPER

Revision of the Textile Labelling Regulation

April 2024

Key points

SBS recommends changes to:

- Wording and definitions;
- Structure and organisation of the label;
- Revision of the annexes;
- Fibre specifications;
- Textile specifications, standards and certifications.

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Background

In March 2022 the European Commission presented an EU strategy for sustainable and circular textiles. The strategy is part of the 2020 circular economy action plan and includes in particular actions under the new regulation on eco-design requirements for sustainable products and the new directive empowering consumers for the green transition directive. In this context, it has been decided to revise the textile labelling regulation.

The Commission launched a consultation to revise the textile labelling regulation to introduce specifications for the physical and digital labelling of textiles, including sustainability and circularity parameters based on requirements under the proposed regulation on eco-design for sustainable products.

SBS welcomes this initiative, both in its intentions and in its timing. The textile labelling regulation must find its rightful place in a complex and changing legislative environment. It must be integrated with other projects such as the digital product passport and other existing regulations (e.g. PPE Regulation).

In this paper, SBS proposes a variety of solutions for the constructive update of this regulation.

Wording and definitions

To avoid misunderstandings, SBS recommends the following updates to definitions in Article 3 of the existing regulation:

- **'Textile fibre'** in its more 'traditional' definition should be supplemented by including a reference to fibres which are obtained from the process of recovery and recycling of textile waste that constitutes a secondary raw material, and which are then subjected to subsequent processing to produce fabrics. 'Textile fibre' is therefore to be understood as any material of natural, vegetable, artificial and synthetic origin which, through the process of spinning or extrusion, is transformed into yarn or into a basic material mainly for the manufacture of woven textiles, knitwear, or other textile products, including all manufactured articles in which such material can be used. The definition of 'textile fibre' includes materials obtained from the recovery and recycling process (pre- and post-consumption) that can in turn be transformed back into yarn through the spinning process.
- **'Fibre fragments'** should be defined as a part of textile fibre material used for study and research and experimentation, and therefore not usable in the subsequent processing stages to produce a yarn or fabric. This category includes non-recyclable or recoverable material produced by the normal production process, consequently identified as waste.
- **'Fibre waste'** should be defined as the product of the primary production of fibre or yarn or from a sorting operation (in which recoverable materials are selected from those that are no longer reusable) that cannot be destined for recovery (e.g. at the spinning mill), as it is considered the last waste product.
- The term **'main lining'** needs a clearer definition. For example, linings of clothing can contain several materials which are not only decisive for the cleaning process, but also when it comes to the recycling of the product, as the definition in Article 3 is used to determine to exempt these parts from the labelling in Article 11.
- The term **'inclusive labelling'** is inconsistent with the same terminology as in Annex IV 1. and should be revised.
- We consider the term **'pure textile products'** (Article 7, Point 1.) to be worth deleting. Only the 100% indication should be possible.

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Structure and organisation of the label

Currently, the regulation allows the brand or company name to be directly preceded or followed by the fibre name. All other information must be listed separately. In practice, however, it often happens that fibre properties are placed directly next to the fibre name. This is not correct according to the regulation, but welcomed by most consumers as it allows them to obtain concise and precise information about the fibre quality.

From the manufacturer's and consumer's points of view, it would therefore be desirable to be able to use terms to describe the fibre in more details (e.g. mercerised, super-combed, organic, microfibre) directly before or after the fibre name.

Apart from the current textile fibre names and trademark notes, we additionally ask for more details on fibre properties (e.g. mercerised) separated by a comma (e.g. 100 % Lyocell, Tencel® instead of the current options '100 % Tencel® Lyocell' or '100 % Lyocell Tencel®'). References to the percentages of recycled fibres could also be stated via this method. We propose a structure as followed:

- 100% cotton, mercerized
- 100 % virgin wool (kbT)
- 100 % Lyocell, Tencel®

From our experience as SBS members, we can say that our own members continue to speak out in favour of physical marking or labelling of the fibre content as well as the care instructions (see the method of attachment in Article 14 et seq.). In this respect, there is no need for a separate regulation on the digital provision of data within the framework of this regulation. It would only lead to further confusion. More extensive textile labels that require additional seams or raised prints on the product could also lead to the removal of those labels by customers because they irritate the skin.

Revision of the annexes

The list of textile fibre names in Annex I of the textile labelling regulation should be expanded. Some labels are too general and may lead to problems in processes after placing them on the market. For example, Polyester fibres are a very broad family of fibres, most of which react similarly to washing or cleaning. However, some harden or dissolve and destroy the treated textiles (e.g. with hydrocarbon solvents). Moreover, for the recycling process, a precise fibre name would increase the chance of a fibre-to-fibre recycling.

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The list of textile products for which inclusive labelling is sufficient (Annex VI) must be expanded, in particular to include the following categories:

- Mats;
- Towel rolls; and
- Mops.

Annexes IV and VII continue to raise questions among economic operators as to their correct application. These annexes should be clearer and take into account the needs of the times (consumer interest, modern product design).

Annexes V and VI shall be checked to ensure that they are up to date.

Fibre specification

Article 9, Point 2. should give the possibility to subsume the fibres ('fibres which do not exceed 5% of the total weight of the textile product, or fibres which do not exceed 15% of the total weight of the textile product'). This rule should not distinguish whether a fibre is recycled or non-recycled as it is impossible to prove this.

The existing tolerance rules in Article 20 require that foreign fibres are not the result of deliberate addition and are not due to manufacturing technology. Proof of this is often difficult to provide and leads to difficulties in practice. Up to a threshold of 5 %, it should be allowed to subsume smaller fibre fractions under the term 'other fibres'.

Textile specification and certifications

SBS recommends the mandatory application of the international care labelling code based on symbols:

- The standard EN ISO 3758:2023, *Textiles — Care labeling code based on symbols*, should be used for all textiles.
- For professional workwear, EN ISO 30023:2021, *Textiles — Qualification symbols for labelling workwear to be industrially laundered*, should be used separately.

Including this care-labelling information would highly increase the longevity of clothing. Thus, consumers and SME dry-cleaners and laundries could easily identify which processes are to be applied for the cleaning. Unidentified fibre composition and the lack of care labelling are two reasons why textiles are damaged in the reprocessing, cannot be used anymore and have to be disposed with.

Furthermore, SBS is calling for an EU-wide, independent set of rules for leather labelling, both nationally and at EU level in agreement with the European Leather Association COTANCE. But leather labelling must be included in this as a part of the material labelling to be revised so that an EU-wide uniform definition of leather for 'what leather is' is guaranteed and so that the misuse of the term 'leather' is prevented. The same goes for fur. Insertion into the system of material marking is possible without amending Article 3 (1. (a)) for textile products, and separate definitions of 'fur' and 'leather' may be made without changing the other provisions of this article.

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Inclusion of sustainability and circularity parameters

The inclusion of sustainability and circularity parameters into the textile labelling regulation should be done with a measured approach since individual regulations already exist or are due to be published.

A framework to set harmonised eco-design requirements across the EU for specific product groups in order to improve their circularity, energy efficiency and other environmental sustainability aspects has already been agreed upon. Textiles are one of the priorities there. It should be avoided that metrics and parameters that need to be measured are addressed in overlapping regulations.

In March 2023, the European Union also presented its proposal for a directive on green claims. The new directive is intended to protect consumers from misleading information concerning a product's environmental impact. The proposed directive contains precise and strict requirements. In this respect, it seems superfluous to regulate the use of recycling claims within the framework of this regulation and especially for textile products only.

However, a legal obligation for minimum reprocessability (dry-cleaning, wet-cleaning, washing) should be introduced. The responsibility to determine the number of reprocessing cycles should be left to the distributor and the manufacturer. Final users should be able to choose a textile that is reprocessible so that all non-reprocessible products should be clearly labelled. Consumers often expect all clothing to be reprocessible/washable, which is not clearly the case for all clothing.

An integration of sustainability and circularity aspects into the Digital Product Passport is much more expedient and overlaps could also be avoided this way.

Additionally, admixing recycled fibres into new textiles could result in the presence of chemicals that are no longer allowed. To encourage the recycling of old stocks of textiles, this issue should be addressed by the textile legislation, and not only in the context of textile labelling. At the legislative level, a transitional period should be envisaged to increase the use of recycled fibres.

Conclusion

The revision is supported by SBS because labels in their current form can be improved in terms of structure and precision. However, a balanced approach should be found between the information included in the physical textile label and the complementary information virtually accessible. Additionally, it should be avoided that topics addressed in other specific regulations (e.g. Personal Protective Equipment, Digital Product Passport or Medical Devices) are simultaneously addressed in the textile labelling regulation as well.

We would also like to point out that the newly mentioned labelling areas will entail additional costs and administrative burdens for SMEs, even if this is done with digital tools and supported by AI in the future. The highest priority for our SMEs is that the EU may streamline all standardisation projects and does not enact double or triple regulations. In order to prevent distortions of competition vis-à-vis European SMEs, it is necessary to ensure that the EU has effective control mechanisms in place to ensure compliance.

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Small Business Standards (SBS) is the European association representing and supporting small and medium-sized companies (SMEs) in the standardisation process, both at European and international levels.

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