

CALL FOR EVIDENCE
FOR AN EVALUATION AND IMPACT ASSESSMENT RUN IN PARALLEL

TITLE OF THE INITIATIVE	Revision of EU rules on textile labelling
LEAD DG – RESPONSIBLE UNIT	DG GROW G1
LIKELY TYPE OF INITIATIVE	Proposal for a Regulation of the European Parliament and of the Council
INDICATIVE PLANNING	Q4-2024
ADDITIONAL INFORMATION	https://single-market-economy.ec.europa.eu/regulation-eu-10072011_en

This document is for information purposes only. It does not prejudice the final decision of the Commission on whether this initiative will be pursued or on its final content. All elements of the initiative described by this document, including its timing, are subject to change.

A. Political context, evaluation, problem definition & subsidiarity check

Political context

The [EU strategy for sustainable and circular textiles](#) aims to address the growing impact that production and consumption of textile products have on the environment. As stated in the strategy, the consumption of textiles by private households in the EU accounts on average for the fourth highest negative impact on the environment and on climate change, and the third highest for water and land use from a global life cycle perspective.

At the same time, the competitiveness of the textiles sector, and notably its recovery, is suffering from the impacts of the COVID-19 pandemic and Russia’s invasion of Ukraine.

The Strategy foresees a number of legislative and non-legislative measures to tackle the impact of textiles on the environment including the review of the Textile Labelling Regulation ⁽¹⁾. Thus, the Commission intends to explore the possibility of a single and uniform set of rules on labelling requirements, on all potentially relevant labelling domains, for textile products, and related products. These are principally leather and fur products of apparel, clothing accessories and interior/household products, with the exclusion of footwear, for which the labelling is governed by [Directive 94/11/EC](#).

This review shall be done in close overall connection with recently proposed legislation such as the [proposed Ecodesign for Sustainable Products Regulation \(ESPR\) and its Digital Product Passport](#), the [proposed amendment of the Waste Framework Directive \(WFD\) regarding textile waste](#) and the [proposed Empowering Consumers Directive](#). [Synergies with](#) the new General Product Safety Regulation (EU) 2023/988, the Organic Production Regulation (EU) 2018/848 and the [proposed directive on corporate sustainability due diligence](#) shall also be explored.

Evaluation

Almost 10 years have passed since the Textile Labelling Regulation was last (partly) evaluated ⁽²⁾. It is important to again assess and potentially review the Regulation, as announced in the Textiles Strategy, to consider whether

⁽¹⁾ REGULATION (EU) No 1007/2011 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on textile fibre names and related labelling and marking of the fibre composition of textile products:
[EUR-Lex - 32011R1007 - EN - EUR-Lex \(europa.eu\)](#)

⁽²⁾ COM(2014)633 – REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL on the application of Regulation (EU) No 1007/2011 on textile fibre names and related labelling and marking of the fibre composition of textile products” and “COM(2013) 656 - REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL regarding possible new labelling requirements of textile products and on a study on allergenic substances in textile products.

(and if so how) to amend it so as to address new challenges arising from current circumstances. The evaluation of the Regulation will serve to underpin the impact assessment of a potential revision.

The evaluation will assess the relevance and effectiveness, consistency, efficiency (including simplification) and EU added value of the Regulation. This will be done by assessing the results and impacts of its implementation (including that of its amending delegated acts) with a particular focus on the change in regulatory, technological/scientific and market contexts since the 2013-2014 evaluations. All relevant policy objectives will be taken into consideration, notably single market integration, competitiveness of the EU industry and particularly of SMEs, consumer protection and environmental protection. Therefore, consistency will be assessed, in relation to current and to the extent possible also recently proposed EU legislation, in the fields of the single market and industrial policy, and also consumer and environmental protection.

The time period covered will be from 2014 (the date of the prior evaluation) to the present date and the geographical scope will be that of the EU/EEA.

The products and associated services markets will be those of textile products and leather and fur products, with a particular focus on clothes/apparel, clothing accessories and household/interior products (with the exclusion of footwear).

Problem the initiative aims to tackle

Since the evaluation has not yet been conducted, the problem definition is preliminary and will be refined once the results of the evaluation are available, and the recently proposed legislation is adopted to allow for harvesting of synergies across the legal acts, notably the Ecodesign proposal and the planned ESPR Delegated Act for Textiles (which should introduce the Digital Product Passport and the substantive rules on sustainability and circularity).

Three main issues have been preliminarily identified as mutually compounding problems in relation to labelling of textile products and closely related products:

- the fragmentation of the single market;
- the lack or deficiency of information to consumers; and
- the environmental (including climate) sustainability of the textiles sector.

In the absence of harmonised rules on labelling of textile products in relation to aspects beyond their fibre composition, disparate rules in Member States have emerged that increase compliance costs for companies. Together with disparate industry practices, this may lead to both confusion and lack of information to consumers, who are interested in knowing the characteristics of the products, which products to acquire, and how to use them responsibly.

These regulatory and market failures are, in turn, intensified by a growing environmental concern on the part of Member States, industry and consumers. They are trying to address, in an uncoordinated effort, how to communicate to consumers in an accurate manner environmental information on textile products. Most of the clothing and household textiles consumed in Europe are produced in third countries. In 2022 the EU imported EUR 98 billion of clothes. The consumption of textiles in the EU accounts on average for the fourth highest (after food, housing and transport) negative impact on the environment and on climate change and the third highest for water (after food and recreation) and land use (after food and housing) from a global life cycle perspective.

It is expected that concerns regarding the environmental sustainability of the textiles sector will grow in the near future, notwithstanding other EU regulatory actions under way, and that further uncoordinated actions on labelling may create risks. Because of this, problems are likely to intensify if no EU action is taken under this or another legal instrument.

A global effort to reduce the negative environmental and social impacts of the textiles industry is necessary and information on ethical aspects should be made available to consumers. In that respect, several measures already proposed by the Commission aim for a high level of social sustainability - notably the due diligence obligations for larger companies to uphold fundamental rights, including social rights, coupled with the ban of products made by forced labour.

Stakeholders have expressed growing concerns about the absence of harmonised rules on labelling of textile

products, and related products, notably in relation to environmental aspects. Some companies have also complained about lack of clarity and consistency regarding specific aspects of the current Regulation, which should also be addressed. Disparate legislation in Member States has already led the Commission to ask relevant Member States to amend certain legislation that is seen as a barrier to single market integration in the context of Technical Regulation Information System (TRIS) notifications. The Commission has also recently initiated an infringement procedure.

Basis for EU action (legal basis and subsidiarity check)

Legal basis

The legal basis is Article 114 of the Treaty on the Functioning of the EU, as a measure principally addressed at the establishment and functioning of the internal market.

Practical need for EU action

EU action is necessary to address the problems because Member States acting on their own will likely result in greater fragmentation of the single market and continuing deficiency of information to consumers through increasingly disparate rules. Furthermore, while some Member States require more information to consumers on several aspects of textile products, and related products, others have not regulated labelling domains beyond fibre identification (as governed by the current Regulation) and are not expected to do so. This will lead to increasingly disparate industry practices and lack of information to consumers.

Legislation at EU level will streamline disparate rules across Member States and fill the regulatory gaps in Member States that have not legislated on the matter. This will help to achieve single market integration, more complete and consistent consumer information, and wider unified environmental protection in a more efficient manner than would be possible under regulatory alignment by Member States on their own.

B. Objectives and policy options

The review will seek to:

- **reduce compliance costs** for companies in relation to national legislation and ensure **regulatory clarity and consistency**; and
- ensure that **consumers** have access to all the relevant **information** on textile products, and related products, in an accurate, intelligible, and comparable manner, without any misleading information, including information on the products they are thinking of acquiring and information on how to use them properly and responsibly, **notably from an environmental perspective**.

As a **baseline scenario**, EU rules on textile labelling, (if left unchanged and thus limited to fibre composition) are expected to grow increasingly misaligned with Member States' legislation and industry practice on labelling of textile products. This will happen as both Member States and industry seek to provide more information to consumers on the characteristics of those products and on how to use them. Even if a planned ESPR Delegated Act for Textiles ultimately harmonises information to consumers on sustainability and circularity aspects, disparate rules and practices would persist and proliferate for information regarding care, size, origin, non-textile animal content and other aspects of textile and on the digital labelling thereof.

Soft law, notably guidance on interpreting and adjusting the differing rules and practices on textile labelling to the free movement of goods, the needs of consumers, and to closely related EU rules, could reduce the impact of absent harmonised rules. Still, the problems would remain fundamentally unaddressed, as single market integration and better information to consumers would not be achieved.

Therefore, **options** will be explored to not only revise the text of the current Regulation, clarifying and updating its rules on fibre identification, but also to consider digital labelling, building on the proposed architecture for the Digital Product Passport, and language-independent symbols or codes and a sustainability and circularity label,

derived from the more extensive ecodesign information requirements contained in the Digital Product Passport, looking also at which legal instruments are the most suitable to achieve the expected objectives ⁽³⁾.

Additional labelling domains will also be explored, such as origin ('made in'), EU-wide uniform size, care labelling, presence of allergenic substances, leather and fur authenticity (enlarging the scope of the Regulation beyond textile products), flammability, organic/bio-origin, and socially responsible production of textile and related products.

Proportionality will be extensively considered, notably in sub-options on the voluntary or mandatory nature of the harmonised labelling domains, with particular attention for SMEs, which comprise almost 99% of the sector.

C. Likely impacts

Existing and ongoing studies, complemented by stakeholder consultations and a combined evaluation/impact assessment, will examine all the relevant impacts. Some impacts can be broadly anticipated at this stage.

Economic impacts

All options will, to varying degrees, simplify the existing disparate legislation in Member States and streamline industry practices. This is expected to have a positive economic impact, by reducing unnecessary burden on companies/manufacturers and ensuring regulatory consistency and synergy with other forthcoming EU legislation, including in their solutions for digital labelling, in line with the digital product passport under the Ecodesign for Sustainable Products Regulation.

As for more novel labelling domains, which are today not widely present (such as flammability, organic/bio-origin and a social label), added costs are expected but not at a significant scale, mainly due to consistency with other EU legislation (respectively the new General Product Safety Regulation (EU) 2023/988, the Organic Production Regulation (EU) 2018/848, and the [proposed directive on corporate sustainability due diligence](#)).

The costs and benefits of the various options will be systematically analysed and quantified wherever possible. In particular, quantification is necessary when it comes to analysis of the administrative burden or burden reduction in view of applying the one-in, one-out principle. Special attention will also be paid to analysing the competitiveness aspects of the various options.

Social impacts

In general, only indirect social impacts are expected. They largely derive from increased competitiveness of the textiles sector in the EU due to the economic gains described above, resulting in positive impacts on employment and jobs. The technical demands on labelling could also generate more specialised, higher-paying jobs, mostly in relation to digital labelling and to labelling on sustainability and circularity in the context of the wider new green economy brought forward by the [proposed Ecodesign for Sustainable Products Regulation](#) for textiles.

In relation to labelling on socially responsible production of textile products, and related products, a specific positive social impact is expected, as greater visibility on social aspects of production will foster more socially conscientious business models, benefiting workers and suppliers.

Environmental impacts

A positive environmental impact is expected from sustainability and circularity labelling that provides more easily accessible, understandable and comparable information on the impact of the various products, fostering greener consumer practices. Better fibre identification and digital labelling is expected to ease textile waste management.

An additional positive impact is also expected from harmonised environmental dimensions, mostly in origin ('made in'), size and care labelling. These will foster, respectively, greener consumer practices in relation to transportation carbon footprints, EU-wide scalability of the second-hand market (due to EU-wide uniform sizes

⁽³⁾ Insofar as there is a need to supplement the vast information contained in the digital product passport on sustainability and circularity of textile products, directed at consumers, with a label, such a label would comprise limited essential derived information conveyed in a visually appealing format (to increase readability and comparability). Such a label would be introduced under the Textile Labelling Regulation, along with all other labelling rules for textile products, instead of separately, through the ESPR Delegated Act on textiles (which lays down the substantive rules on sustainability and circularity) under the Ecodesign for Sustainable Products Regulation.

and more durable products), and easily accessible and understandable information on durability, energy efficiency, lower microplastic emissions, repair, and end-of-life disposal. Leather and fur authenticity, particularly if requiring animal species identification, will also increase consumer information and environmental awareness.

Therefore, the initiative is expected to have a positive impact on the following **Sustainable Development Goals**:

- Goal 8 - Decent Work and Economic Growth
- Goal 9 - Industry, Innovation and Infrastructure
- Goal 12 - Responsible Consumption and Production
- Goal 13 - Climate Action

D. Better Regulation instruments

Impact assessment and evaluation

A back-to-back evaluation and impact assessment will support the development of this initiative and will inform the Commission's decision. The problem analysis in the impact assessment will depend largely on the evaluation results. An external contractor will conduct a study supporting the evaluation and the impact assessment.

The back-to-back evaluation and impact assessment will draw on the 2013-2014 evaluations, which analysed, at the time, the performance of the Regulation and the potential for certain added labelling domains. These labelling domains will now be the object of renewed consideration for harmonisation, in the current regulatory, technological/scientific and market contexts.

Consultation strategy

This call for evidence will be published on the Commission's central [public consultations webpage, the Have your say portal](#), for stakeholder feedback for 6 weeks.

A public consultation will be organised and aim at:

- collecting factual information, data and knowledge on the application of the Regulation, thus adding to the specification of the current baseline, to the existence of the problems and of their scale, subsidiarity and EU dimension; and
- obtaining views, factual information, assessments and estimates on the possible impact of the various initial options for revision of the Regulation, as seen from the perspective of the individual stakeholder (including data about costs and about the potential benefits of the options).

The questionnaire will be made available around November 2023 [on the Commission's central public consultations webpage, the Have your say portal](#), in all 24 EU languages; contributions can be submitted in all 24 EU languages. In-depth targeted consultations, interviews, a validation workshop and a dedicated textile expert group meeting are also envisaged. An SME panel, conducted by the European Enterprise Network, is also planned.

The Commission has set up a [web page dedicated to informing about the activities related to the revision of the Regulation](#). A factual summary report of the public consultation will be published in the Have your say portal 8 weeks after the closure of the public consultation.

A synopsis report, a summary of all consultation results, will also be prepared and will be included in an annex to the impact assessment report.

Why we are consulting?

Stakeholders are consulted with a view to collecting evidence in relation to the functioning of the current Regulation regarding pre-identified problems and to seek opinions on envisaged solutions.

Target audience

All stakeholders and citizens in general are welcome to participate in the public consultation, in particular businesses in the sector (including social economy players and waste managers), consumers and consumer organisations, environmental and social organisations, and public authorities.