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# Public consultation on the Textile Labelling Regulation (EU) 1007/2011

Fields marked with * are mandatory.

## Public Consultation on the Textile Labelling Regulation (EU) 1007/2011

### About this consultation

**Consultation period**: December 2023 – March 2024
**Topic:** Textile

**Target audience**
This consultation relates to textile and related products, meaning leather products, apparel and clothing accessories (even if made of other materials, such as leather or fur) as well as textile, leather and/or fur interior/household products, except for footwear products (which are governed by Directive 94/11/EC and the review of which is not currently planned).
This public consultation is aimed at: European consumers of textile and related products; companies producing such products, including fibre, yarn or fabric producers as well as companies producing their raw input materials and companies processing them; businesses associations; intermediate and final product manufacturers; importers; distributors; brands and retailers; e-commerce platforms; managers of products such as waste; representatives of ministries and public authorities; national regulators; certification bodies; testing laboratories; academic and research organisations; and non-governmental organisations (NGOs), including environmental protection organisations, consumer organisations and social organisations.

### Why we are consulting

We are consulting to collect evidence on the importance and effectiveness of the Textile Labelling Regulation (EU) 1007/2011(the Regulation). We would also like to gather opinions on the issues and potential policy options to address current gaps in the rules, including by expanding labelling to relevant domains and products not currently covered. The results of this consultation will inform the evaluation of the Regulation and the impact assessment on its possible revision.

**Responding to the questionnaire**

You can contribute to this consultation by filling in the online questionnaire. If you are unable to use the online questionnaire, please contact us: GROW-G1@ec.europa.eu
Questionnaires will be made available in all official EU languages. You can submit your responses in any official EU language.

You can pause any time and continue later. You can download your contribution once you have submitted your answers.
For reasons of transparency, organisations and businesses taking part in public consultations are asked to register in the EU's Transparency Register.
A summary report will be published on the consultation page after the survey closes. This consultation builds on the call for evidence on the Regulation, which was launched on the 3rd of August 2023 and closed on the 30th September 2023. The responses to the call for evidence will also inform the evaluation and impact assessment.

**Personal data and privacy statement**
The European Union (EU) is committed to protecting your personal data and to respecting your privacy. When we carry out public consultations, we comply with the rules set out in Regulation (EU) 2018/1725 on processing of personal data by the EU institutions.
More information on the protection of your personal data is available here.

## Introduction

The EU's textiles regulatory and policy framework faces the challenge to address the environmental impacts and social sustainability of this economic sector within the context of the Green Deal and the Circular Action Plan objectives adopted in 2019 and 2020, respectively.

As a commitment under the Green Deal, the EU Sustainable and Circular Textiles strategy was adopted in 2022 to address the production and consumption of textiles while recognising the importance of the textiles sector. It emphasises the importance of promoting green and digital transitions in the textile and fashion sectors, setting out a framework and a vision for the transition of the textiles sector. It is being implemented through several initiatives.

The transition pathway is a key non-regulatory initiative in the strategy. It is a policy report, co-created with stakeholders, identifying 50 specific actions to make the textiles ecosystem greener, more digital and to ensure its long-term resilience and competitiveness. Stakeholders are encouraged to submit commitments to implement the pathway.

Among the regulatory initiatives, the planned revision of the Regulation stands at a crossroads along with several other initiatives.

The Regulation applies to textile products and products with textile components made up of at least 80% by weight of textile fibres. It contains rules on the:

- labelling and marking of the fibre composition of textile products;
- labelling or marking of textile products containing non-textile parts of animals; and
- determination of the fibre composition of textile products, including of textile fibre mixtures.

Thank you for your participation.

## About you

### * Language of my contribution

- ○ Bulgarian
- ○ Croatian
- ○ Czech
- ○ Danish
- ◉ Dutch
- ○ English
- ○ Estonian
- ○ Finnish
- ○ French
- ○ German
- ○ Greek
- ○ Hungarian
- ○ Irish
- ○ Italian
- ○ Latvian
- ○ Lithuanian
- ○ Maltese
- ○ Polish
- ○ Portuguese
- ○ Romanian
- ○ Slovak
- ○ Slovenian
- ○ Spanish
- ○ Swedish

* I am giving my contribution as

- ○ Academic/research institution
- ○ Business association
- ○ Company/business
- ○ Consumer organisation
- ○ EU citizen
- ○ Environmental organisation
- ○ Non-EU citizen
- ○ Non-governmental organisation (NGO)
- ◉ Public authority

- Trade union
- Other

* First name

Latoya

* Surname

Balogun

* Email (this won't be published)

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* Scope

- International
- Local
- National
- Regional

* Level of governance

- Parliament
- Authority
- Agency

* Organisation name

*255 character(s) maximum*

Ministry of Infrastructure and Water Management

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

*This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.*

- Afghanistan
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- Argentina
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- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain

- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
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- Ghana
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- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

## * Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

- ○ **Public**

  Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☑ I agree with the personal data protection provisions

## Questionnaire

**My field of activity**

If you are a 'Public authority', please select:

- ☐ Customs
- ☐ Market surveillance
- ☐ Enforcement
- ☑ Regulatory
- ☐ Other

* How familiar are you with the Textile Labelling Regulation (the Regulation)?

- ○ Never heard of it
- ○ Have heard of it but unsure what it does
- ○ Some familiarity with the Regulation and its provisions
- ◉ Highly knowledgeable about the Regulation and its provisions

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The questionnaire consists of 3 sections: **Section A** focuses on the current situation, **Section B** relates to definition of the problems related to the Regulation and **Section C** is forward-looking and focuses on possible solutions and impacts.

For this questionnaire,

References to **textile products** means any raw, semi-worked, worked, semi-manufactured, manufactured, semi-made-up or made-up product containing at least 80% by weight of textile fibres, including such products classified as apparel, clothing accessories or interior / household products.

References to **textile related products**, unless otherwise stated, means:

- leather products;
- apparel and clothing accessories, if non-textile materials (such as leather or fur) account for 20% or more of their weight;
- interior / household products if leather or fur account for 20% or more of their weight.

Footwear (which is governed by Directive 94/11/EC, the review of which is not currently planned) is excluded from this questionnaire.
References to **labels** include **markings**.

## A. Regulating textile labels – current situation

### Q1. To what extent does the information on textile product labels support consumers in making purchasing decisions?

- ○ To a large extent
- ◉ To some extent
- ○ To a limited extent
- ○ Not at all
- ○ Don’t know

### Q2. How useful do you find the information about the fibre composition of textile products provided on labels?

- ○ Very useful
- ◉ Somewhat useful
- ○ Of limited use
- ○ Not at all useful
- ○ Don’t know

### Q3. Do textile product labels provide the following information?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Information that is clear and transparent in content | ◉ | ○ | ○ | ○ | ○ |

| | | | | | |
|---|---|---|---|---|---|
| Information that is easily readable | ○ | ◉ | ○ | ○ | ○ |
| Information in consumers' national languages | ○ | ○ | ◉ | ○ | ○ |
| Accurate information on non-textile parts of animal origin | ○ | ◉ | ○ | ○ | ○ |

Q4. To what extent has the implementation of the Regulation contributed to the following results?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Accurate information about fibre composition on labels | ○ | ◉ | ○ | ○ | ○ |
| Accurate fibre classification (list of fibre names) at EU level (Annex I to the Regulation) | ◉ | ○ | ○ | ○ | ○ |
| Harmonised test methods and standards for determining the fibre composition of textile products | ○ | ○ | ◉ | ○ | ○ |
| Clear provisions on scope of textile products covered by labelling requirements (products covered and products exempt) | ○ | ◉ | ○ | ○ | ○ |
| Transparent, simpler and faster application process for adding new fibre names to the list (in Annex I to the Regulation) | ○ | ○ | ○ | ○ | ◉ |
| Accurate information about presence of non-textile parts of animal origin | ○ | ○ | ◉ | ○ | ○ |

Q5. To what extent has the Regulation improved the functioning of the EU single market in the following areas?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Clear uniform rules for all businesses operating within the EU | ○ | ◉ | ○ | ○ | ○ |
| Fair competition among textile product manufacturers and retailers | ○ | ○ | ◉ | ○ | ○ |
| Increased consumer trust and confidence in textile products | ○ | ○ | ◉ | ○ | ○ |

Q6. You can explain your answers to question 5 here:

*1000 character(s) maximum*

Onderzoek ("kledinglabels: nauwkeurig of niet", door Circle Economy) naar de nauwkeurigheid van samenstellingdeclaraties op kledinglabels toont aan dat er reden is tot twijfel over de informatie op labels, met name voor textielproducten die bestaan uit meer dan één vezeltype. Onnauwkeurige samenstellingdeclaraties op labels hebben momenteel weinig gevolgen voor de consumentenveiligheid, maar resulteren wel in oneerlijke concurrentie en verminderend consumentenvertrouwen in labels.

Daarnaast ondervinden kledingmerken en - handelaren geen (publieke) repercussies als gevolg van onnauwkeurige labels. Uniforme richtlijnen zouden producenten kunnen ondersteunen in het gebruik van accurate kwaliteitscontrolemechanismen, waar de samenstelling van producten op gebaseerd kan worden. Daarnaast is handhaving en controle essentieel om te voorzien in accurate labels. Dit kan de afwijking tussen de geclaimde samenstelling en de daadwerkelijke samenstelling van het textielproduct minimaliseren.

Q7. To what extent have the harmonised EU rules to provide information on textile fibre content on product labels brought benefits compared to the possibility of differing rules on textile labelling in the legislation of Member States ?

- (●) To a large extent
- ( ) To a moderate extent
- ( ) To a limited extent
- ( ) Not at all
- ( ) Don’t know / no opinion

Q8. Do you think textile labelling should continue to be governed at EU level?

- (●) Yes
- ( ) To a large extent, with some additional rules from EU/EEA Member States
- ( ) To a limited extent, with key rules introduced by EU/EEA Member States
- ( ) No – the Regulation should be repealed
- ( ) Don’t know / no opinion

## B. Regulating textile labels – problem definition

Q9. To what extent do the following developments in the textile sector make current rules outdated?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Availability of digital labelling technologies | (●) | ( ) | ( ) | ( ) | ( ) |
| Availability of technologies enhancing traceability and transparency of the value chains | (●) | ( ) | ( ) | ( ) | ( ) |
| Increased use of recycled fibres | ( ) | (●) | ( ) | ( ) | ( ) |

| | | | | | |
|---|---|---|---|---|---|
| Placing new fibres on the market not listed or not specifically listed in Annex I to the Regulation | ○ | ○ | ◉ | ○ | ○ |
| New or improved testing methods or standards for determining the fibre composition | ○ | ◉ | ○ | ○ | ○ |
| Standards used widely internationally, different from EU rules | ○ | ○ | ◉ | ○ | ○ |
| New or improved technologies for automated scanning of fibre composition | ○ | ○ | ◉ | ○ | ○ |
| Social sustainability concerns of the textile sector value chains | ◉ | ○ | ○ | ○ | ○ |
| Increasing environmental impact of the textile sector | ◉ | ○ | ○ | ○ | ○ |
| Rise in greenwashing in labels - false, unclear, misleading or otherwise not well-substantiated information provided in labels regarding environmental sustainability | ◉ | ○ | ○ | ○ | ○ |
| Different requirements under the laws of EU /EEA Member States on labelling of textile and textile related products | ○ | ◉ | ○ | ○ | ○ |
| Different corporate practices on labelling of textile and textile related products across EU/EEA Member States | ○ | ○ | ◉ | ○ | ○ |
| Increased complex technical use of textile products such as smart / e-textiles | ◉ | ○ | ○ | ○ | ○ |
| Other | ○ | ◉ | ○ | ○ | ○ |

## Q10. If other, please specify

*300 character(s) maximum*

Het toenemende gebruik van niet-verenigbare labels (vaak polyester) is een ontwikkeling. Het is arbeidsintensief om niet-verenigbare labels te verwijderen. Verder vormen deze labels vaak een vervuilende belemmering voor recycling. We pleiten voor labels uit hetzelfde materiaal als het product zelf.

## Q11. You can explain your answers to question 9 here:

*1000 character(s) maximum*

In de herziening van de verordening dient meer aandacht uit te gaan naar de enorme groei van de fast-fashion industrie en bijhorende relatie tot duurzaamheid (ecologische en sociale duurzaamheid). De kledingindustrie zou transparanter moeten worden over de keten, waarbij meer prioriteit wordt gegeven aan consuminderen en de levensduurverlenging van textiel dat op de huidige markt in de omloop is.

Een consument die via een label correct geïnformeerd wordt over bijv. de levensduur, % gerecycled materiaal, aanwezigheid microplastics, impact op biodiversiteit, CO2 voetafdruk, watergebruik, reparatie mogelijkheden en/of informatie over sociale verantwoordelijk bij productie van het textielproduct, zal worden ondersteund in het maken van een duurzame aankoopbeslissing.

Daarnaast geldt dat wanneer bedrijven weten dat deze informatie openbaar wordt, het hen mogelijk zal stimuleren om meer aandacht te besteden aan hoe zij textiel op een verantwoorde wijze op de markt kunnen aanbieden.

Q12. Currently, in the EU there are no harmonised labelling rules for the following domains of textile products and textile related products. To what extent do you consider it a problem for the functioning of the EU/EEA single market and for making informed consumer decisions?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Sustainability and circularity, (including durability, recyclability, recycled content, emission of unintentional microplastics, carbon footprint, etc.) | ◉ | ○ | ○ | ○ | ○ |
| Origin of the product (‘made-in’ label) | ◉ | ○ | ○ | ○ | ○ |
| Size of apparel and clothing accessories | ◉ | ○ | ○ | ○ | ○ |
| Care information (to properly wash/iron/dry but also in relation to aspects of use such as energy use /efficiency, safety, reduced microplastic emissions, proper end-of-life disposal) | ◉ | ○ | ○ | ○ | ○ |
| Presence of allergenic substances | ◉ | ○ | ○ | ○ | ○ |
| Presence of nanomaterials in smart textile products / e-textile products | ◉ | ○ | ○ | ○ | ○ |
| Flammability of textile products | ◉ | ○ | ○ | ○ | ○ |
| Information on durability commercial guarantees and repair instructions | ◉ | ○ | ○ | ○ | ○ |
| Presence of natural fibres from organic production | ◉ | ○ | ○ | ○ | ○ |
| Information on social responsibility | ◉ | ○ | ○ | ○ | ○ |
| Authenticity of leather and fur content | ◉ | ○ | ○ | ○ | ○ |
| Information on deforestation responsibility for leather products and cellulosic fibre products | ○ | ◉ | ○ | ○ | ○ |
| Other | ◉ | ○ | ○ | ○ | ○ |

Q13. If other, please specify

*300 character(s) maximum*

We willen graag de aanwezigheid van gerecyclede vezels van zowel open als gesloten lus oorsprong aan deze lijst toevoegen. Informatie waaruit blijkt dat het textielproduct gerecyclede vezels bevat, kan bijdragen aan het maken van een geïnformeerde (en duurzame) aankoopbeslissing.

## Q14. You can explain your answers to the previous question 12 here:

*1000 character(s) maximum*

De consument heeft recht op juiste informatie om een goed geïnformeerde keuze te kunnen maken bij de aankoop van een textielproduct. Hiervoor is het van belang om uniforme richtlijnen te hanteren en streng op de naleving hiervan te handhaven.

Daarnaast kan een textiellabel dat informatie verschaft over bijhorende impact op milieu en maatschappij bij de productie en consumptie van het textielproduct, bedrijven ook stimuleren om transparanter te zijn over de impact van hun kleding, waar het vandaan komt, waar het van is gemaakt is, et cetera. De huidige textiellabels zijn beperkend in de informatie die ze meegeven aan de consument. Wij steunen uniforme, geharmoniseerde duurzaamheidslabels voor textiel en aanverwante producten.

Verder is het van belang dat het textielproduct aan de veiligheidsvereisten voldoet en dat gerecycled materiaal ook veilig is en blijft voor de mens.

## Q15. Are there any other aspects that you would like to mention?

Er zal een koppeling nodig zijn tussen het textiellabel (voortkomend uit de herziening van de Textile Labelling Regulation), het digitale productpaspoort en de informatie eisen voor textiel die onder de Ecodesign wetgeving verplicht worden gesteld. Het is belangrijk om te zorgen dat al deze Europese trajecten goed op elkaar aansluiten en complementair zijn aan elkaar. Dit is wat ons betreft een belangrijk aandachtspunt.

We kunnen ons voorstellen dat het label de belangrijkste informatie in relatie tot milieu prestatie op hoofdlijnen laat zien, terwijl het digitale productpaspoort verschillende doelgroepen voorziet van uitgebreide informatie in relatie tot de gehele levenscyclus van het product.

Het kabinet ziet de Europese Product Environmental Footprint methode als een geschikt middel om textielproducten op een vergelijkbare, betrouwbare en begrijpelijke manier te voorzien van een milieuscore. Wanneer de Product Environmental Footprint Category Rules voor de productgroepen “Apparel and Footwear” worden vastgesteld, kan de PEF methode worden gebruikt om textiel en aanverwante producten te vergelijken in milieu-impact. Deze milieuscore kan vervolgens worden weergegeven op een textiellabel. Een toelichting bij deze informatie kan worden verschaft door middel van het onderliggende digitale productpaspoort. Het digitale productpaspoort zou dieper kunnen ingaan op de eigenschappen van het textielproduct, inclusief bijvoorbeeld een onderbouwing van de milieu score zoals vermeld op het textiellabel.

# C. Regulating textile labels – the future

This section refers to identifying potential solutions to the potential problems.

## Q16. To what extent would the following measures enable the functioning of the EU /EEA single market and support consumers in making informed purchasing decisions?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| | | | | | |

| | | | | | |
|---|---|---|---|---|---|
| Introducing language-independent labelling information (through symbols or codes) | ◉ | ○ | ○ | ○ | ○ |
| Broadening the scope of the Regulation to all apparel products and clothing accessories (including to non-textiles) | ◉ | ○ | ○ | ○ | ○ |
| Broadening the scope of the Regulation to leather and fur interior / household products | ◉ | ○ | ○ | ○ | ○ |

## Q17. You can explain your answers to question 16 here:

*1000 character(s) maximum*

We zouden ook graag aandacht willen vragen voor het feit dat fysieke labels van grote bedrijven die in meerdere/tot alle lidstaten verkopen, vaak uitgebreide labels gebruiken met informatie in alle talen van die lidstaten waar ze in actief zijn. Dit nodigt de consument niet uit tot het lezen van deze labels. Daarom zou het goed kunnen zijn om naast het label, met een additionele QR-code te werken, die je naar passende informatie in je eigen taal brengt.

Daarnaast rest ons de vraag hoe de informatie-eisen die voor textiel onder de Ecodesign-wetgeving worden gesteld, zich zullen verhouden tot de herziening van de Textille Labelling Regulation. Wij vinden het belangrijk dat deze twee EU trajecten, die beide inzetten op informatie-eisen over de duurzaamheid van textiel, goed op elkaar aansluiten. Dit ook wegens de vrijwel parallelle uitwerking van beide trajecten. We willen ervoor waken dat onder deze herziening zaken worden ingeregeld die beter onder de Ecodesign wetgeving passen.

## Q18. What would you be in favour of when it comes to physical and digital labelling for textile products and textile related products in enabling the functioning of the EU single market and supporting consumers in making informed purchasing decisions?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Replacing the physical label with a digital label | ○ | ○ | ○ | ◉ | ○ |
| Introducing a digital label with additional information, supplementing the information on the physical label | ◉ | ○ | ○ | ○ | ○ |
| Keeping only the physical label | ○ | ○ | ○ | ◉ | ○ |

## Q19. You can explain your answers to question 18 here:

*1000 character(s) maximum*

Een fysiek label kan helpen bij het in één oogopslag duidelijk maken van de informatie die op het label vermeld staat. Mogelijk dat deze informatie sneller te lezen is door een eenvoudige manier van weergave (zoals symbolen/codes). Verder is een fysiek label toegankelijk voor diverse bevolkingsgroepen (denk aan mensen zonder telefoon of met onvoldoende digitale vaardigheden) en is het dus een inclusieve vorm van informatieverschaffing.

Toch pleit Nederland voor de ontwikkeling van een hybride vorm van het textiellabel. In lijn met de invoering

van het digitale productpaspoort (DPP), lijkt het ons niet verstandig om enkel vast te houden aan een fysiek label. Het voordeel van het digitaal aanbieden van aanvullende informatie in een DPP, is dat toelichting kan worden gegeven bij de informatie die vermeld staat op het textiellabel. De digitale informatie dient goed gereguleerd te worden, bijvoorbeeld door de informatie-eisen die onder de Ecodesign wetgeving aan textiel gesteld worden.

## Q20. To what extent would the following measures **improve the functioning of the EU /EEA single market**?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Increasing clarity on fibre composition rules, including on assessing composition of mixture of more than 3 fibres | ◉ | ○ | ○ | ○ | ○ |
| Introducing higher composition tolerance margins in case of recycled content in textile products | ○ | ◉ | ○ | ○ | ○ |
| Introducing more specific information on fibre composition in the label that could ease sorting and recycling of textile waste | ○ | ○ | ○ | ◉ | ○ |
| Increasing clarity on rules on applications for new textile fibre names (to be added to the list of fibre names in Annex I of the Regulation) | ○ | ◉ | ○ | ○ | ○ |
| Increasing clarity on exclusion of certain textile products from labelling requirements | ○ | ◉ | ○ | ○ | ○ |
| Introducing rules to prevent the removal of physical labels | ○ | ○ | ○ | ◉ | ○ |
| Strengthening market surveillance and enforcement rules related to placing textile products on the EU /**EEA** single market | ◉ | ○ | ○ | ○ | ○ |

## Q21. To what extent would the following measures **support consumers in making informed purchasing decisions**?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Increasing clarity on fibre composition rules, including on assessing composition of mixture of more than 3 fibres | ◉ | ○ | ○ | ○ | ○ |
| Introducing higher composition tolerance margins in case of recycled content in textile products | ○ | ○ | ◉ | ○ | ○ |
| | | | | | |

| | | | | | |
|---|---|---|---|---|---|
| Increasing clarity on rules on applications for new textile fibre names (to be added to the list of fibre names in Annex I of the Regulation) | ○ | ○ | ○ | ◉ | ○ |
| Increasing clarity on exclusion of certain textile products from labelling requirements | ○ | ○ | ○ | ◉ | ○ |
| Introducing rules to prevent the removal of physical labels | ○ | ○ | ○ | ◉ | ○ |
| Strengthening market surveillance and enforcement rules related to placing textile products on the EU /EEA single market | ◉ | ○ | ○ | ○ | ○ |

Q22. To what extent would the following measures have a **positive impact on environmental and social sustainability**?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Increasing clarity on fibre composition rules, including on assessing composition of mixture of more than 3 fibres | ◉ | ○ | ○ | ○ | ○ |
| Introducing higher composition tolerance margins in case of recycled content in textile products | ◉ | ○ | ○ | ○ | ○ |
| Introducing more specific information on fibre composition in the label that could ease sorting and recycling of textile waste | ○ | ○ | ◉ | ○ | ○ |
| Increasing clarity on rules on applications for new textile fibre names (to be added to the list of fibre names in Annex I of the Regulation) | ○ | ○ | ○ | ○ | ◉ |
| Increasing clarity on exclusion of certain textile products from labelling requirements | ○ | ◉ | ○ | ○ | ○ |
| Introducing rules to prevent the removal of physical labels | ○ | ○ | ○ | ◉ | ○ |
| Strengthening market surveillance and enforcement rules related to placing textile products on the EU /EEA single market | ◉ | ○ | ○ | ○ | ○ |

Q23. Do you agree with introducing harmonised EU labelling rules in the following areas?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| | | | | | |

| | | | | | |
|---|---|---|---|---|---|
| Sustainability and circularity, (including durability, recyclability, recycled content, emission of unintentional microplastics, carbon footprint, etc.) | ◉ | ○ | ○ | ○ | ○ |
| Origin of the product (‘made-in’ label) | ◉ | ○ | ○ | ○ | ○ |
| Size of apparel and clothing accessories | ◉ | ○ | ○ | ○ | ○ |
| Care information (to properly wash/iron/dry but also aspects of use such as energy use/efficiency, safety, reduced microplastic emissions, proper end-of-life disposal) | ◉ | ○ | ○ | ○ | ○ |
| Presence of allergenic substances | ◉ | ○ | ○ | ○ | ○ |
| Presence of nanomaterials in smart textile products / e-textile products | ◉ | ○ | ○ | ○ | ○ |
| Flammability of textile products | ◉ | ○ | ○ | ○ | ○ |
| Information on durability commercial guarantees and repair instructions | ◉ | ○ | ○ | ○ | ○ |
| Presence of natural fibres from organic production | ◉ | ○ | ○ | ○ | ○ |
| Information on social responsibility | ◉ | ○ | ○ | ○ | ○ |
| Authenticity of leather and fur content | ◉ | ○ | ○ | ○ | ○ |
| Information on deforestation responsibility for leather products and cellulosic fibre products | ○ | ◉ | ○ | ○ | ○ |
| Other | ○ | ○ | ○ | ○ | ○ |

## Q24. You can explain your answers to question 23 here:

*1000 character(s) maximum*

Op de webpagina van deze Europese verordening staat vermeld: WHAT DOES THIS REGULATION DO? "It seeks to ensure that EU consumers are properly informed and that the EU clothing and textile market operates smoothly." Daaruit blijkt dat het label is bedoeld voor de consument en dus niet voor andere doelgroepen. We steunen deze gedachte.

Sorteerders zijn niet de doelgroep van deze verordening. Zij gebruiken de labels niet. Daarnaast zijn de labels vaak uit kleding verwijderd of onleesbaar geworden door het wassen tegen de tijd dat ze bij de sorteerder komen.

Het toegankelijk maken van informatie aan doelgroepen anders dan de consument, zoals sorteerders, zal naar verwachting worden geregeld door middel van het digitale productpaspoort.

## Q25. To what extent would the following harmonised labelling domains **improve the functioning of the EU /EEA single market**?

| | | | | | |
|---|---|---|---|---|---|
| | | | | | |

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Sustainability and circularity, (including durability, recyclability, recycled content, emission of unintentional microplastics, carbon footprint, etc.) | ◉ | ○ | ○ | ○ | ○ |
| Origin of the product (‘made-in’ label) | ◉ | ○ | ○ | ○ | ○ |
| Size of apparel and clothing accessories | ◉ | ○ | ○ | ○ | ○ |
| Care information (to properly wash/iron/dry but also aspects of use such as energy use/efficiency, safety, reduced microplastic emissions, proper end-of-life disposal) | ◉ | ○ | ○ | ○ | ○ |
| Presence of allergenic substances | ◉ | ○ | ○ | ○ | ○ |
| Presence of nanomaterials in smart textile products / e-textile products | ◉ | ○ | ○ | ○ | ○ |
| Flammability of textile products | ◉ | ○ | ○ | ○ | ○ |
| Information on durability commercial guarantees and repair instructions | ◉ | ○ | ○ | ○ | ○ |
| Presence of natural fibres from organic production | ◉ | ○ | ○ | ○ | ○ |
| Information on social responsibility | ○ | ◉ | ○ | ○ | ○ |
| Authenticity of leather and fur content | ◉ | ○ | ○ | ○ | ○ |
| Information on deforestation responsibility for leather products and cellulosic fibre products | ○ | ◉ | ○ | ○ | ○ |

Q26. To what extent would the following harmonised labelling domains have a **positive impact on environmental and social sustainability**?

| | To a large extent | To some extent | To a limited extent | Not at all | Don't know |
|---|---|---|---|---|---|
| Sustainability and circularity, (including durability, recyclability, recycled content, emission of unintentional microplastics, carbon footprint, etc.) | ◉ | ○ | ○ | ○ | ○ |
| Origin of the product (‘made-in’ label) | ◉ | ○ | ○ | ○ | ○ |
| Size of apparel and clothing accessories | ◉ | ○ | ○ | ○ | ○ |
| Care information (to properly wash/iron/dry but also aspects of use such as energy use/efficiency, safety, reduced microplastic emissions, proper end-of-life disposal) | ◉ | ○ | ○ | ○ | ○ |
| Presence of allergenic substances | ◉ | ○ | ○ | ○ | ○ |

| | | | | | |
|---|---|---|---|---|---|
| Presence of nanomaterials in smart textile products / e-textile products | ◉ | ○ | ○ | ○ | ○ |
| Flammability of textile products | ◉ | ○ | ○ | ○ | ○ |
| Information on durability commercial guarantees and repair instructions | ◉ | ○ | ○ | ○ | ○ |
| Presence of natural fibres from organic production | ◉ | ○ | ○ | ○ | ○ |
| Information on social responsibility | ◉ | ○ | ○ | ○ | ○ |
| Authenticity of leather and fur content | ◉ | ○ | ○ | ○ | ○ |
| Information on deforestation responsibility for leather products and cellulosic fibre products | ◉ | ○ | ○ | ○ | ○ |

Q29. Do you have anything to add on how labels for textile products and textile related products sold in the EU/EEA could be improved?

*500 character(s) maximum*

Nederland zet in op het hanteren van de PEF methode voor het textiellabel en hecht waarde aan het stellen van ambitieuze Ecodesign eisen voor circulair textiel. De Product Environmental Footprint (PEF) methode kan worden gebruikt om een levenscyclusanalyse uit te voeren voor de productgroepen "Apparel and Footwear". Hierdoor wordt het mogelijk om deze productgroepen te vergelijken op milieu impact. Door het opnemen van Ecodesign eisen zou je vervolgens kunnen sturen op deze milieu impact.

Q30. Do you have any additional points to raise? You can upload further information to support your views using the field below.

**Please note** that all submissions will be published as submitted and should not include any personal data (including personal email addresses). If you have selected above that your contribution can be published only anonymously, please ensure that there is nothing in the uploaded document that would reveal your identity.

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