

EU Ecolabel for textile products: Stakeholder table of comments - scope definition					21/10/2013 v3
Reference	Criteria or subject	Aggregated theme	Summary of stakeholder comments	JRC-IPTS response	Addressed, rejected or modified?
Article 1	Cleaning products	Exclusion of cleaning products	Concern was raised about the exclusion of cleaning products from the scope. A number of cleaning products are currently licensed. A tailored set of fitness for use criteria relating to washing resistance were proposed for consideration.	Cleaning products carry out specific functions to which specific fitness for use criteria would apply. A review of the Nordic Swan criteria for fabric cleaning products, which has four criteria, confirms this. The proposed new fitness for use criteria will be incorporated. Evidence from leading brands such as Vileda suggests that an additional sub-criterion on absorbence would be required in addition to washing resistance in order to create a meaningful criteria. This proposal has been developed with the input of a CB and a new criteria addressing wash resistance <i>and</i> absorbence has been drafted.	Accepted - a new criteria has been formulated
	Scope definition	Maintain flexibility in the scope definition for clothing, accessories and interior textiles	The examples of products listed should not be exhaustive or restrictive but should serve as examples for Competent Bodies and applicants.	The criteria text is to be amended accordingly.	Accepted
			The examples of products listed should not be exhaustive or restrictive but should serve as examples for Competent Bodies and applicants.	The criteria text is to be amended accordingly.	Accepted
Article 2	Excluded fibres	Re-introduce the clause allowing fibre for which no fibre-specific criteria are set	Without this clause a number of different types of fibres that may be relevant to GPP would be excluded such as aramid fibres.	This clause was deleted earlier in the revision process because of a consensus view that it would allow fibres with no environmental criteria to be used in an Ecolabelled product. This was not a position that could be accepted. Moreover LCA evidence was not forthcoming for technical fibres such as aramid.	Rejected - Additional fibres will be addressed within the scope of GPP
		Ensure that it is clear that only fibres that have ecological criteria can be awarded the Ecolabel.	It is proposed to insert a specific clause stating that only specific fibres for which there are criteria can be awarded the Ecolabel.	The list of fibres for which there are ecological criteria has been copied into Article 1 which defines the scope.	Accepted
	Scope definitions for processes	Add a definition for finishing processes	There should be a definition of "finishing" in order to avoid that only one phase of the textile process will be considered.	A definition has been added, based on the textile BREF and AFIRM's chemical guidance document.	Accepted
Article 3	Reference to standards	Ensure that references to standards are generic	National references and the publication date should be omitted from EN or ISO standard references so as to avoid obsolescence. Reference should instead be made to the more recent published version.	EN and ISO references will be checked in line with the comments made.	Accepted

	Laboratory certification	Require EN ISO 17075 for testing laboratories	Without this requirement there would be a disincentive for certification.	It is the position of DG ENV and the EUEB that this cannot be required because it would restrict access to laboratories. A wording is used that requires instead general or equivalent compliance. This would permit in-house testing.	Modified - General or equivalent compliance is required
	Testing equivalence	Test method equivalence can lead to inconsistency	If equivalence was to be accepted then this could lead to inconsistent verification by Competent Bodies.	As far as possible test methods shall be specified according to an EN or ISO standard, or a specific analytical technique.	Accepted
		Clarity is needed if other test methods may be used	The draft standard states that other test methods may be used if their equivalence is accepted by the Competent Body, however, in the Stakeholder table of comments it appears to read differently.	Test methods may be used where they are accepted as being equivalent by Competent Bodies.	Accepted
	Equivalency with other labels	Acceptance of equivalent Type I Ecolabels	This would lead to problems as it is difficult to assess the equivalence of all aspects of another ecolabel. Moreover, how would this be maintained if a labelling scheme changes its criteria during a validity period.	The aim of proposing equivalence was to minimise the additional burden for applicants. However, where possible references will be removed to refer only to the underlying criteria requirements which could be fulfilled by other ecolabels. In some more specific cases	Modified - Where possible reference is made to the use of test data from other labels. In some cases where the schemes have been evaluated it is still felt
		Maximum threshold for membranes and coatings	Synthetic material not covered within the scope of the criteria requires further consideration. The Nordic Swan sets thresholds for membranes and coatings of 20%. All of other materials could be set at a limit of 15%.	The Regulation (EC) 1007/2011 on textile fibre names and related labelling and marking of the fibre composition of textile products is based on a threshold of 80% textile content. It therefore seems appropriate to align the criteria with this threshold. This would restrict the content by weight of other materials such as membranes and coatings to less than 20%, in-line with stakeholder proposals.	Accepted by amending the overall minimum textile content.
		Conformance of certification systems with ISO/EIC Guide 65	It was considered challenging and difficult for Competent Bodies to verify this requirement to the level stated in the proposal. A simple declaration would be the best option.	A less strict reference has been proposed whereby certification bodies should <i>reflect as far as possible the guidance in EN 45011 and ISO 17065</i> . Accreditation and certification according to these systems is important in order to ensure that schemes provide a high and consistent level of assurance.	Modified - General equivalence is expected
	Frequency of verification	Highlight criteria that require frequent reporting during license periods	Some criteria require frequent reporting to CBs (with approvals following), during license validity. These specific criteria could be presented together in a scheme/table (in an Annex) to make it easier for both applicants and CBs to keep track .	A general point has been added to Article 3 that where there are changes in suppliers or production sites then licenseholders should provide CB's with updated verifications. Text has also been added highlighting the ongoing testing requirements of Criteria 13, the Restricted Substance List.	Modified - New poiints have been added to Article 3

EU Ecolabel for textile products: Stakeholder table of comments - fibre criteria					21/10/2013 v3
Reference	Criteria or subject	Aggregated theme	Summary of stakeholder comments	JRC-IPTS response	Accepted, rejected or modified?
Pre-amble	Fibre scope	Criteria for silk	It was queried as to why silk does not have criteria. It is becoming more important for high quality products in combination with other fibres. Its absence could limit the potential of the Ecolabel.	Given the absence of an LCA evidence base for the environmental impact of silk it is proposed to exclude silk from this revision. Early indications from the Oxford Biomaterials study (UK, commencing Spring 2013) are that a criteria would be required because of the potential for very high embodied energy. It is understood that upon the time of the next revision full LCA evidence following the PEF methodology should be available.	Rejected - Silk is not to be included within the Ecolabel textile fibre scope.
		Criteria for aramid fibres	It was also queried as to why aramid fibre, which typically has applications such as fire service and military, should not be included.	Given the lack of an LCA evidence base for the environmental impact of aramid fibres it is proposed to exclude this type of fibre from the revision. Global production in 2009 amounted to just 64,000 tonnes, dominated largely by Dupont (USA) and Teijin (Japan), so their market significance is very limited.	Rejected - Aramid is not to be included within the Ecolabel
	Complex products	Market barrier to the labelling of complex products	It was noted by one stakeholder that the 85% threshold for compliance with the fibre criteria is a barrier to more complex products such as suits becoming ecolabelled. Typically linings and paddings cannot currently be commercially sourced to meet the Ecolabel's specifications.	Components such as linings and paddings that might amount to less than 20-25% of the garment weight are not generally commercially available to Ecolabel specifications. Filling materials are more readily available in a high recycled content specification. Cellulose acetate, which is commonly used for suit linings is a commodity fibre product but specific fibre criteria would be required. It is therefore proposed to exclude padding and lining from having to meet the fibre criteria and, because it should be easier for the remaining balance of fibres to comply, to remove the reference to an 85% threshold.	Paddings and linings - to be excluded. Removal of 85% threshold. Fillings shall comply with fibre criteria.
	Reference to recycled fibres	Exception for fibres with recycled content	The definition of recycled fibres should be clarified to recognise that fibres and their feedstocks may be obtained from a range of different sources, textile or otherwise.	The text in the introduction to the fibre criteria has been amended accordingly.	Accepted
		Verification that hazardous chemicals are not present	The product should guarantee the absence of SVHC with traceability of the material guaranteed. This could be carried out through a supplier declaration or carrying out a spot check test (i.e. test method)	Assessment/verification text has been added to Article 3 requiring traceability for recycled content - 'Where required by Criteria 13 declarations and laboratory testing results shall be provided by fibre manufacturers and feedstock suppliers' - linking to the testing requirement in criteria 13.	Accepted
1. Cotton	Market analysis	Availability of different deniers of cotton	The availability of cotton does not mean that it is available for all types of products since different yarn characteristics are required.	It is understood that the organic and (certified) IPM cotton markets have been driven by manufacturer/retail demands. No feedback has been received from stakeholders detailing specific barriers related to yarn characteristics. Moreover, a flexible approach to cotton content is now proposed, which should allow applicants to respond to market availability.	The new proposal builds in market flexibility

	1a-c Production standards	Application of pesticide testing	The remaining balance of cotton should be tested for pesticides and/or should be IPM or transitional cotton.	Consultation with cotton experts strongly suggests that pesticide testing of the cotton boll is not an effective/accurate method for determining specific pesticide use/non-use. Pesticide restrictions can only have scientific value if they are supported by stronger verification. Farmer/producer group declarations are therefore proposed as an additional measure. However, it currently appears that this may only be possible to obtain this easily in conjunction with an IPM scheme.	Accepted
		Setting of minimum cotton content standard	A methodology should be provided for where applicants wish to combine organic and IPM cotton.	In general evidence suggests that manufacturers and retailers are pursuing strategies based on either organic or IPM cotton. A simplified approach is proposed based on a minimum content for organic or IPM. A weighting could be considered if requested (e.g. 1 unit IPM = 2 units organic)	Modified - A weighting could be considered but evidence suggests that either organic or IPM are selected in the marketplace.
			The requirements that shall apply to the remaining proportion of the cotton shall be clarified.	It is proposed to apply a pesticide testing requirement to the remaining proportion of the cotton which is not organic or IPM cotton.	Accepted
			The use of recycled cotton is environmentally preferable to organic or IPM cotton.	An incentive is included within Article 2 where recycled content is greater than 70%. However, limited verified evidence could be found to confirm the life cycle benefits of recycled cotton fibre and yarn.	An incentive exists within Article 2 for recycled content
		GMO cotton	In order to manufacture Ecolabel textile products, genetically modified (GMO) cotton should not be used.	EU policy does not specifically prohibit GM cotton production, although Member States have varying policies. The use of specific GM plant breeds in the EU is subject to authorisation. Of the IPM schemes reviewed only Fair Trade and Cotton Made in Africa restrict GMO's, which would unduly restrict licenseholders access to IPM cotton.	Rejected - The proposal would contradict EU policy
			Where a product contains organic cotton the remaining balance of the conventional or IPM cotton should not, according to the EU Organic Regulation (EC) 834/2007, contain genetically modified organisms.	The organic production standard 1(a) has been modified to clearly state that where conventional and/or IPM cotton are combined with organic cotton that this cotton shall not be genetically modified. A clause has also been added to the assessment and verification which refers to Regulation (EC) No 1830/2003 on traceability and labelling.	Accepted
		Verification of minimum cotton content standards	Should a product's content be verified on an annual or a product basis?	Verification on a product basis may be more relevant to consumer goods, where content claims are valued. An annual basis may be more appropriate for commercial textiles. To encourage the widest possible number of applications both forms of verification are proposed. Verification shall be by production line.	Clarified - Both forms of verification are to be accepted.
		Permit conversion organic cotton	It is proposed to allow conversion cotton since the new EU organic farming regulation (EU 834/2007) does not permit consumer labelling of conversion any more this would broaden the options.	Acceptance of conversion organic cotton has been continued from the previous criteria set noting, however, that Regulation 834/2007/EU does not encompass organic cotton.	Accepted

	1a Organic standard	Setting of a minimum organic cotton content standard	The organic cotton minimum content is not ambitious enough and should be at least 70%	Production of organic cotton whilst being demand driven declined in 2012 and 2013, accounting for just under 1% global production and an estimated 2% of the EU market. Whilst the product content strategies that have driven demand have been based on high content levels a similar requirement could lock-out potential applicants from the Ecolabel.	Modified - A high content requirement is proposed for selected consumer products
			A content requirement of 95% shall be specified for certain products that commonly contain organic cotton in order to drive the market. The EU Ecolabel Regulation contains in clause (6) and Article 6(5) a reference to supporting organic production because of the clear message it sends to consumers.	This proposal was put forward in September 2012 and was discussed by stakeholders. The benefit of this approach is that it can be specified to target a proportion of the market with the greatest potential whilst not completely restricting the product group. Concerns related the products would be selected and the need for consistent application of a criteria. A revised proposal has been formulated, with the products cross checked for market significance based on the IMPRO study and for their presence in the organic product lines related to GOTS certifications (mainly specialist retailers) and the major retailers/brands that account for the majority of EU demand (e.g. H&M, C&A, Zara).	Accepted, a modified version of the September 2012 proposal has been re-inserted.
			The organic cotton minimum content is too ambitious due to the limited market availability.	The growth of organic cotton to date has been driven by demand from brands and retailers. Given a further projected decline in production in 2013/14 by 2-3% it is therefore important that the EU Ecolabel plays a role in sustaining demand, which has largely been driven by products with a high content which can be communicated to consumers. Making it a requirement would, however, have the potential to lock potential applicants out of the Ecolabel.	Modified - A flexible approach is proposed with organic cotton being one route to comply.
			If the argument of insufficient volume shall really be a robust basis for decision in the EUEB there must be a volume calculation for all cotton textiles currently labeled with the EU Ecolabel - it is likely that there is sufficient organic cotton on the market to fulfill this volume.	The criteria should be set in a way that ensures that they reflect, indicatively, the best 10-20% on the market. Since cotton is the predominant fibre on the EU market and the criteria set as a whole is challenging to comply with it is important that if a minimum organic cotton content is set that it is realistic. There is currently no market information with which to determine the current volume of Ecolabelled textiles.	It is not possible to respond due to the absence of data.
		Use of the criteria to drive a future increase in demand	A strategic aim should be established for the organic cotton requirement applied to all Ecolabelled products to be 70% by 2020 at the latest. The EU Ecolabel Regulation contains in clause (6) and Article 6(5) a reference to supporting organic production because of the clear message it sends to consumers.	The preferred option proposed is an annual rise in the 10% minimum requirement in function of the market availability. The adjustment to the minimum requirement would be set to increase faster than market availability in order to create new demand. This shall be checked with the Commission's legal service to see if it can be used within the legal framework of the Ecolabel Regulation. Alternatively, the Decision could be accompanied by a note on the commitment of the EC and the EUEB to re-evaluate the minimum organic cotton content requirement within a period of time e.g. 2 or 3 years after the criteria come into force.	A preferred option has been proposed

		Not all organic cotton production is reported	Not all organic cotton production, for example in Turkey and Egypt, is reported through the Textile Exchange annual survey. The picture of market share may not, therefore, be accurate.	The indicative data provided does not suggest, as yet, a significant potential boost to the global market share beyond the reported peak of market share for organic cotton in 2010. A more significant contributor may be farmers who cannot afford pesticides (sources suggest 10-15% global production) who may be entering IPM schemes such as CMiA and Fair Trade.	-
		Information should be provided about what can be claimed on the Ecolabel	Information about what claims can be made for different levels of content should be provided e.g. minimum level of content to claim an organic cotton product.	A table of claims based on different levels of content is proposed and has been added to the criteria dealing with information on the Ecolabel.	Accepted - see criteria 28
	1b IPM production standard	The Ecolabel should go beyond mandatory minimum EU standards	IPM will be made mandatory within the EU by 2014 through the Framework Directive 2009/128/EC. Ecolabel criteria have to go beyond mandatory standards of plant protection. Moreover, IPM standards cannot ensure the absence of highly hazardous pesticides or GMO production.	The majority of cotton grown globally is produced outside of the EU. IPM is estimated to account for approximately 20% of global production. The market share in 2012 for BCI, CMiA and Fair Trade is estimated to be 6.8% (Textile Exchange 2013). Framework Directive 2009/128/EC promotes and encourages the use of IPM techniques but does not contain systems of verification that IPM is 'implemented by all users'. A number of IPM certifications restrict the same pesticides that are restricted by the Ecolabel.	Modified - it is proposed that where an IPM certification does not restrict the listed hazardous pesticides then the cotton must comply with the testing requirements.
		Application of pesticide testing	Additional pesticide testing would still be required to ensure absence of harmful pesticides requiring applicants to also bear this cost.	It is proposed that where a certification scheme includes a restriction on the same listed pesticides that is verified either by cotton testing or by on-site auditing of producer groups and/or farmers then this shall be accepted. This would encourage take-up of IPM schemes which apply pesticide restrictions.	Modified - the need for testing IPM cotton will depend on the certification requirements.
			A threshold for pesticides is specified despite a requirement that the listed substances shall not be used. Does an IPM scheme exist that allows the use of any of these substances?	Not all of the listed pesticides are WHO Class Ia or b. In the case of BMP there are no specific restrictions. Farmers within the schemes may therefore use listed pesticides. This, together with the potential for cross-contamination, is understood to make the threshold limit still valid.	Rejected, the criteria is based on testing, given the potential for cross-contamination.
			Absolute restrictions are required on use of the listed pesticides as this ensures that cotton improvement options are comparable.	It is proposed that where a certification scheme includes a restriction on the same listed pesticides that is verified either by cotton testing or by on-site auditing of producer groups and/or farmers then this shall be accepted.	Modified - the need for testing IPM cotton will depend on the certification requirements.
		Concern about the market impact of IPM cotton on Organic cotton	The market share of IPM is surprisingly high - has it grown since 2006?	The background market share of 20% is all IPM cotton (Kooistra and Termorshuizen 2006) making it a good fit for the Ecolabel. No data could be found to determine a trend since 2006 but an increased focus globally on the environmental impact of agriculture suggests continued growth is likely. The EU market share in 2012 for BCI, CMiA and Fair Trade is estimated to be 6.8% (Textile Exchange 2013).	Commentary only

			Concerns were raised that IPM's growth may hinder the development of organic cotton.	Certification of IPM cotton is a new concept and is growing rapidly. It is therefore different from organic cotton in that it is a process of increasing the certification and traceability of a product that is already on the market. It is true that some large brands have switched their focus from organic to IPM but the recent Textile Exchange report (2012/13) on the organic cotton market identifies this as only one of four factors constraining growth. It is also the case that for brands and consumers organic is a much clearer and effective branding than IPM and that a number of the major brands such as H&M are still committed to significant growth.	Modified, IPM is considered to be a good fit for the Ecolabel. A flexible approach is proposed.
		Concern about the practicality of the transition for existing licenseholders	Switching over to 50% IPM concent could present significant production and supply chain challenges.	The introduction of stronger environmental criteria for cotton is seen as an important revision. A balance must be struck between bringing along existing licenseholders and attracting new licenseholders. A transitional period will be proposed for existing licenseholders.	Accepted - A flexible approach is proposed, with stronger verification of pesticide restrictions as an alternative to IPM and organic cotton.
		Specification of IPM schemes that will be accepted	Specifying IPM schemes runs the risk of the criteria becoming outdated and not exhaustive. International equivalence has yet to be established.	Given the early stage in the market availability of IPM certifications it is felt to be important to highlight credible schemes/programmes. Stakeholders clearly requested guidance of credible schemes/programmes. Update recommendations could be provided in the User Manual.	Rejected, updates could be provided in the User Manual.
			The Greek Agro 2 scheme should be accepted as it is recognised within the EU	A review of the scheme confirms that it conforms with the UN FAO definition of IPM and is third party certified. It's status with regards to the restricted pesticide list requires clarification. This can be clarified in the User Manual.	Accepted, subject to confirmation of pesticide restrictions (if any)
			The Australian BMP programme is evaluated as worse in relation to pesticide restrictions	Australian cotton is evaluated by ICAC as having one of the highest yields and the lowest unit consumption of WHO Class I pesticides on the global market (SEEP 2010). Wider evidence presented in the technical report suggests that the environmental benefit from IPM has the potential to be equal or greater than the Ecolabel's present pesticide restrictions.	Modified, the pesticide restriction could be requested for BMP
3. Greasy wool		Broaden the definition to include Integrated Crop Management (ICM)	One of the main requirements of Integrated Crop Management (ICM) is Integrated Pest Management (IPM) methods. Therefore it is better to refer to ICM.	Directive 2009/128/EC only refers specifically to IPM techniques. The certifications reviewed for the Ecolabel also only refer for the most part to IPM. It is therefore proposed to make reference to ICM but with a clear focus on IPM as the key requirement.	Modified - reference is to be made but with IPM remaining the main focus.

	1d Traceability	Concern about the cost and systems for traceability	There are limited tools on the market supporting traceability between suppliers. The issue is only address for cotton but not for wool and recycled content fibres.	It is accepted that there are appear to be limited tools on the market, however, this issue has been raised as a major area of concern and reputational risk for the Ecolabel. Those that do exist appear to provide a high level of assurance. The best example is the EU organic certification system which the cotton criteria seeks to emulate. Systems operated by the Textile Exchange and Fair Trade are also considered to provide assurance. These systems are therefore referred to specifically in the verification for the traceability sub-criteria. Traceability is required for fibres with recycled content, but a generic clause should be added.	Accepted, with an approach based on acceptance of leading systems. A generic clause is needed for any other recycled fibres.
	3a Ectoparasiticide restrictions	Acceptance of organic certifications	Different organic wool regulations could allow the use of different ectoparasiticide groups. Analysis would be required from country to country.	The reference to organic certification as a compliance route for the ectoparasiticide restrictions has been removed because of the issue highlighted.	Accepted
		Proposal to derogate wool scouring operations that evaporate their effluent and eliminate ectoparasiticides	A wool scourer evaporates their effluent, effectively resulting in zero discharges, concentrating the ectoparasiticides in a sludge that is the either incinerated or digested anaerobically.	The philosophy of the criteria is to reduce ectoparasiticide application to animals at source, with resulting reductions in diffuse pollution and related to their manufacture. The main source of environmental impact is, however, understood to relate to ectoparasiticides that are released into wool scouring effluent. If the derogation is to be accepted then the wool scourer should demonstrate a high level of resource efficiency, with reference to criteria 3(c)	Modified - It is proposed that such wool scourers meet a minimum of two measures from criteria 3c
		Proposed sampling and testing approach	The proposed approach will be expensive for plants processing large tonnages of wool e.g. 100t per day greasy wool.	The approach in the original criteria was not felt to provide a high level of assurance, particularly in terms of sample frequency. Some industry stakeholders and licenseholders argued for testing of all sales lots to provide assurance. An approach based on composite sampling for sales lots was agreed to be a cost effective means of increasing the sampling.	Rejected - the proposal is a balance between assurance and sample frequency
	3b COD from wastewater	COD cut-off by fibre	What is the rationale and cut-off for coarse and fine wool?	The textile BREF makes a clear differentiation between the two grades of wool. A cut-off of 24.5 microns is proposed based on Australian wool classifications, and in alignment with the textile BREF.	Rejected
		COD requirements for wastewater discharges	The only relevant measurement should be discharges to the environment.	The measurement of COD from wool scouring processes was intended to encourage the cleaning of wool at source, thereby reducing the need for wastewater treatment plant. There is, however, uncertainty as to how selective these targets would have been and the balance of energy saving from reduced wastewater treatment.	Accepted
			In the case of the effluent being partially treated on-site, and then sent to an effluent treatment plant, how would the COD limit be determined?	The COD would be determined by reference to data demonstrating that either the on-site treatment prior to discharge to the environment or the off-site treatment prior to discharge to the environment comply with the COD limit values.	Clarification

5. Elastane			A target of 20g/kg is readily achievable by modern scourers and in many cases will be dictated by local trade waste costs and environmental legislation. A target of 45g/kg could be accepted.	45 and 25g/kg are based on reductions in COD of 75% by coarse and fine wool scourers. 45g/kg would allow scours achieving a high level of dirt and grease removal followed by secondary municipal wastewater treatment to comply.	Accepted
6. Polyamide	3c Resource efficiency	Resource efficiency measures using waste streams	The potential to comply will depend on investment, location and end-market. Scours should be requested to identify/consider measures.	Resource efficiency is a key area of EU policy and an area of improvement potential for wool scours, which can produce multiple waste streams. The criteria is flexible, including a number of different measures, which should ensure that sufficient scours can comply. Ecolabel criteria must be based on implementation of specific measures.	Rejected, resource efficiency is a key EU policy aim and area of environmental improvement potential
	5b DMAc limit values	DMAc limit value and test method	The criteria and derogation conditions are not consistent with the 0.1% SVHC limit. The test method requires revision.	The derogation conditions apply to the final textile product and as such the concentration limits established are below the 0.1% threshold. The concentration on raw fibres can be 0.1 - 0.5%, with acrylic able to meet 0.1%. This concentration is reduced after wet processing to 0.001 - 0.005%. The test method has been revised accordingly.	Modified - reference to the fibre concentration has been deleted, with reference only to final fibre concentration.
6. Polyamide	6b Adipic acid	Uncertainty relating to feedstock emissions data	Given uncertainty about verified data the current criteria should be maintained until verified values become available.	It is considered important to retain an alternative criteria to recycling that relates to the monomer, as we have now made recycled content optional (as also for polyester). Adipic acid was identified by as being the most significant N2O source for nylon 6,6. The adipic acid criterion is derived from verifiable CDM/JI emissions data for adipic acid production sites globally and based on the installation of abatement technology (Stockholm Environment Institute 2010/IPCC guidance).	Modified - the data is considered to be verifiable but a focus has only been retained on caprolactam
		The criteria does not address PA6 fibres/caprolactam feedstock	The adipic acid criterion only relates to PA66 and is not based on reliable (amongst others different system boundaries) and verified criteria.	Comparable data relating to abatement of either N2O or CO2 for caprolactam feedstock production could not be sourced. Industry feedback suggests that verification for the proposed adipic acid criteria would not be readily obtained. Evidence from existing licenseholders suggests that N2O emissions from caprolactam production can be verified. Given its greater significance in the life cycle of nylon fibres it is proposed to retain the nylon 6 monomer emissions requirements.	Modified - It is proposed to retain the caprolactam emissions option for nylon 6
6. Polyamide and 7. Polyester	Recycled content	Alternatives to recycled content	Whilst recycled content is considered to be important alternative improvement options should also be considered as criterion.	LCA evidence shows that recycled content delivers significant life cycle improvements along the life cycle of polyester and polyamide fibres. Alternative options should be capable of delivering similar improvements. Actions such as ISO 50001 are not able to deliver specific defined improvements to the fibre life cycle. It is proposed that existing feedstock/process related sub-criteria become alternative options.	Modified - Proposed existing feedstock and/or process sub-criteria become alternative options
	Recycled content derogations	Derogation of recycled content requirements	Derogations are proposed where specific conditions set by legislation or internationally recognised standards cannot be met and/or where there is proven evidence that quality specifications cannot be met.	The clause is accepted, being supported by manufacturers feedback. However, Competent Bodies expressed concern with regards to verification of the more open clause relating to quality specifications. The clause may not be required if recycled content is made optional for commercial textiles.	Modified - a derogation has been made for destined primarily for commercial and public clients

7. Polyester			The derogation for technical specifications where legislation or standards are set to meet performance data has been deleted, making it in some cases impossible to reach the Eco-label criteria.	The need for the derogation is accepted, being supported by manufacturers feedback. However, Competent Bodies expressed concern with regards to the practicalities of verification for a more open clause relating to quality specifications. The clause may not be required if recycled content is made optional for commercial and/or publicly procured textiles.	Modified - a derogation has been made for destined primarily for commercial and public clients
			Derogations can only be illustrative as otherwise they would be too limiting.	The derogations will need to be as specific as possible to ensure consistency of verification. The quality-related derogation was intended to support existing licenseholders only, no feedback was received from consumer textile licenseholders. Broad headings for possible quality issues that may arise shall be defined.	Modified - Quality themes to be defined for existing applicants.
	7a Antimony content	Application to fibres with a recycled content	The restriction of Antimony should apply to all textiles including all recycled fibres. The level of protection for this substance shall be strict.	Accepted in the final draft - a specific derogation has been made for PET bottles. A comprehensive sampling/testing of PET bottles on the EU market by the Fraunhofer Institute (2011) suggests they meet/exceed the Ecolabel requirements with a mean concentration of 220ppm \pm 32.. PET bottles are the predominate feedstock for recycled polyester.	Modified - A derogation has been made for PET bottles
	7b Recycled content	Derogation of recycled content requirements	Assessment and verification is not possible for the proposed derogations	The derogations were intended to assist with the transition for existing licenseholders. It is proposed that recycled content is optional for commercial/publicly procured products. This avoids the need for complex derogation procedures.	Accepted
		Derogation of recycled content requirements	The derogations should be clearer and may require specialist technical knowledge	It has been difficult to put more detail on the derogations due to limited industry feedback with specifics. They also are intended to be open ended for existing licenseholders and for public procurement as we cannot foresee all the specific issues that may arise.	Modified - Specific themes to be defined for commercial and public products
			The cost and time required to test existing ecolabelled product lines will be significant	The barriers stated are accepted but it was felt at the time that derogating existing licenseholders would not send out the correct market signal. A proposal to require a proportion of product lines to make the transition was discussed at AHWG3 but was not felt to be practical. It is proposed that for commercial textiles recycled content becomes optional, allowing for existing licenseholders to make the transition if they wish. This position is proposed to change at the time of the next revision, allowing sufficient time to explore the quality implications and develop new lines.	Accepted - Recycled content to be optional
	7c VOC emissions	Clarify the verification requirements	Clarify what has to be measured (emission from outlets or also diffuse emissions?) and also list the method that should be used, period of time and number of measurements.	The VOC limit values are taken from the polymers BREF (August 2007) which states that 'All BAT associated emission levels relate to total emissions including both point sources and fugitive emissions.' Reference has been added to either 'monitoring data and/or test reports' and the criteria now mirrors the requirements in 16b, which include reference to an EN 12619 standard.	Accepted - Improvements have been made accordingly

9. Man-made cellulose	Scope of fibres addressed	Cupro and acetate fibres	These type of fibres whilst potentially relevant as a substitute for silk, and are relevant for example as linings in suits, was not covered within the scope of the LCA review.	Whilst criteria had been specified for cupro addressing cotton production and copper emissions to wastewater it is correct to state that there is not an LCA evidence base for this fibre, or for acetate.	Accepted
	9a Sustainable timber	Certified and legal pulp minimum content	The minimum requirement should be 50%, reflecting copying and graphic paper.	Dissolving pulp is a specialist grade of pulp and consultation with stakeholders confirmed that it is currently more difficult to obtain certified dissolving pulp on the world market.	Rejected
	9b Legal sourcing	Certified and legal pulp minimum content	The new EU Timber Regulation means that a requirement is not needed	It is understood that the enforcement of strict requirements based on certifications will only apply to new products placed on the market. For all other products only traceability is required. Moreover, not all possible sources of timber may be covered by FLEGT licenses.	Rejected - the requirement provides assurance for ecolabelled products
	9c OX in fibres	OX in fibres or AOX in wastewater?	AOX in wastewater should also be considered. Not all manufacturers measure OX in fibre. AOX would allow pulp manufacturers to verify ECF bleaching. 0.15 - 0.17 kg/ADT is proposed.	The OX limit value can only be achieved by 'ECF light' bleaching sequences. These are understood from the BREF and technical literature to minimise the potential for the formation of dioxins and other chlorinate compounds. AOX would offer an alternative verification route, but could only be accepted if broad equivalence can be determined with the OX limit value. A comparison of bleaching sequences published by METSO suggests that only sequences with AOX emissions of <0.15-17 kg/ADT pulp would permit an OX in fibres of <150g/tonne pulp to be achieved (allowing for a contribution from bleaching of the final fibre). An AOX limit of 0.17 kg/ADT pulp is therefore proposed.	Accepted - an AOX limit of 0.17 kg/ADT pulp is proposed, as it is understood to be equivalent to ECF-light bleaching.
	9e Sulphide emissions to air	BREF emissions values	The BREF emission value ranges should be accepted for all production technologies	All three viscose fibre production technologies are covered. The filament fibre limit values would, for integrated washing proceses, represent an increase in the limit value from 120g/kg to 170-220g/kg. It is understood that for batch filament fibre processes the lower end figure of 40g/kg is readily achievable (see Technical Report, February 2012).	Modified - Acceptance of staple fibre range, lower end of range is proposed for filament fibre
			The staple fibre emission limit is not achievable and 30 g S/kg already requires a combination of different recovery technologies.	Accepted - the staple figure has been reset to 30 g S/kg	Accepted
	9f Emissions to water	Broadening of final effluent requirements	AOX, COD and sulphide in wastewater should be considered. Restrictions on OX in fibre and sulphide in air emissions do not ensure low wastewater content.	it is understood from industry stakeholders and scientific literature that fibre OX is an indicator of whether chlorine bleaching sequences have been used and therefore also the presence of AOX in wastewater. Sulphide emissions to air are identified as being of more significance than wastewater emissions according to LCA findings (Shen and Patel 2010)	Rejected

	Pulp and paper products	Justification for differences with pulp for paper products	These should be mentioned and justified in the Technical Report.	Dissolving pulp is a specialist grade of pulp used to manufacture viscose fibres. This is reflected in the availability of certified pulp. An LCA study for viscose prioritised forestry, on-site energy/co-product recovery and sulphide emissions. Targets set on COD/TOC would not necessarily encourage energy recovery. Simplified and easy to verify criteria have been developed. Industry has commented and been involved in this process throughout.	-
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EU Ecolabel for textile products: Stakeholder table of comments - chemicals and process criteria					21/10/2013 v3
Reference	Criteria or subject	Aggregated theme	Summary of stakeholder comments	JRC-IPTS response	Accepted, rejected or modified?
Pre-amble	Recycled fibres	Traceability should be ensured for SVHC's	Given the potential for skin contact the product should guarantee the absence of SVHC's. Supplier declarations of testing should be used.	Verification for recycled materials is supported by proposed EU end-of-waste criteria for secondary materials. A balance should be struck between traceability and incentivising recycling. Recycled content will tend not to be homogenous in its source. Recycled textile fibres will have been subject to wash cycles, significantly reducing the potential for migration of chemicals. Homogenous feedstock sources with to which known product safety standards apply could be derogated e.g. PET bottles.	Modified - General approach to be adopted with derogation of known feedstock sources
		Acceptability of the recycled fibre exclusion from hazardous substance restrictions	The clause accepting that recycled fibres may contain substances restricted by the criteria contradicts the sense of the RSL/hazardous substance criteria.	It is proposed to delete the clause and to only make derogations where there is knowledge of the risks being managed for known feedstocks.	Accepted - clause to be deleted
13. Restricted Substance List	Assessment and verification	Supplier declarations are more realistic than SDS	Most of the substances specified in the RSL will only be present below 0.1%. It is proposed to base compliance on supplier declarations.	Accepted, however, where possible SD and/or analytical testing should be requested as supporting evidence of the main ingredients of chemical formulations and recipes.	Modified - Declarations supported by SDS where possible
		Poor/incomplete SDS	How would poor or incomplete SDS be assessed? This is a task for experts.	Consultation with Competent Bodies suggest that this clause should be retained as SDS should contain certain consistent information and it is normally apparent if they are incomplete.	-
			Why are only 10,11 and 12 are identified when other Sections may be relevant.	A review of Annex II suggests that 2, 3 and 9 are also directly relevant, covering as they do basic information requirements that will assist in verification and, moreover, are identified in the assessment and verification.	Modified - Specific additional sections have been added.
		Determination of need for risk-based testing.	Annex 2 provides some indications clear and transparent rules are required.	The approach has been revised. The areas of risk are now reflected in the RSL where product testing is specified for the most significant risks.	Accepted - The risks have been integrated into the RSL.
		Substances shall not be contained in the final product	This clause has the potential to create legal problems because analytical testing has advanced to the stage that traces may still be found. A general limit value of 0.1% is proposed instead.	It is understood that the trace limit value will tend to depend on the substance. Testing is only to be carried out on a risk basis so in these cases a trace limit value is specified. A general limit value could, however, be proposed which could be referred to if verification of non-use is required.	To be discussed further with CB's
		SVHC testing	Who shall decide which test method is to be used?	Reference to test methods has been removed and replaced by a requirement for a declaration supported by screening documentation.	Modification

	Biocides restriction	Biocides should be permitted	The market requests biocidal properties. Their use should be permitted as long as legal requirements are fulfilled.	The previous criteria carry a restriction on the use of biocides in Ecolabelled textiles and to date there has been no request for this position to change.	Rejected, subject to EUEB opinion
		The scope of the restriction should be clarified	Biocide treatment to protect the fibre or textile or to create a biocidal function (antibacterial or odour-inhibition) should be prohibited at all stages of the production process.	Biocides used to impart function to the final product, regardless of which production stage they are applied, are restricted. Authorised biocides are permitted to protect textiles during transport and storage.	Clarification
		Biocides test method	The test method(s) for biocides used in transport and storage is not appropriate. The test methods must be differentiated.	Declarations by suppliers and/or shippers is proposed instead of testing.	Modified
	Candidate List substances	SVHC screening	The clause requiring the screening of the product for Candidate List substances is not required because this conformance with REACH is required.	Articles 6(6) and 6(7) of the Ecolabel Regulation specifically state that Candidate List substances shall not be present in the final product. Conformance is required with the standard legal wording for Ecolabel hazardous substance criteria. Enforcement by Member States of the requirements under REACH is not understood to be consistent, it is considered that the Ecolabel should therefore demonstrate a high level of assurance.	Rejected
		Maintaining compliance during a license period	The consequence of the sentence "at the time of application" shall be made clear – especially in compliance with point 1.3 in the standard contract "the holder shall ensure that the product to be labelled complies throughout the duration of this contract with all the terms of use and provisions set out in Article 9 of the EU regulation, at all times."	Introducing a new requirement to maintain compliance with a transition period to make appropriate substitutions is beyond the scope of the revision process as it is a Horizontal issue for discussion by the EUEB.	For discussion by the EUEB
			Concern was raised that without a threshold limit licenses may have to be withdrawn because of the presence of only ppm of SVHC's	Articles 6(6) and 6(7) of the Ecolabel Regulation specifically states that Candidate List substances shall not be present in the final product. It is proposed that production formulas are screened for SVHC's. Declarations shall therefore be collated by applicants that verify that SVHC's have not been intentionally added during any production stage.	Modified - Declarations shall be used supported by documentation of SVHC screening
	Communication to the supply chain	Applicability to process stages	The RSL should be communicated to all suppliers and subcontractors relevant to the production process for the product. Laundries are not specifically mentioned.	The process stage to which the substance restrictions apply are now identified in the RSL. Laundries are to be included within the definition of 'finishing'.	Modified - RSL specifies production stages
	Definition of restrictions	Clarity of criteria	The criteria text and RSL text give contradictory messages about whether substances are completely restricted or permitted at certain concentrations.	The RSL contains complete restrictions and restrictions to which limit values apply. These are identified for each substance group. Where product testing is required trace limit values are given for substances that completely restricted.	-

	Final product testing	Frequency of testing	Proposals ranged from random testing twice per year to every second year. The burden of testing was a key concern.	In order to improve the level of assurance and to reflect potential changes in suppliers it is proposed that testing is carried out annually on a random basis. This is a compromise between the different proposals put forward.	Modified - Subject to discussion with Competent Bodies.
		Approach to testing	The products tested shall be representative for the product line in question and that the CB's should be involved in which products are tested.	The proposal stipulates where testing is required. CB's may stipulate additional testing but this would be subject to a separate agreement with the applicant.	Clarification
	Fluorinated chemicals	Restriction should be based on OECD definitions	It is proposed that OECD definitions of long chain PFCA's are used as the basis for the restriction of PFOS and PFCA families of substances at chain lengths of >C4 and >C6 respectively	The OECD definition would reflect the latest scientific knowledge on the environmental improvement potential for perfluorinated compounds and major shifts in chemistry as a result of the US EPA's stewardship programme. The new C4 and C6 chemistries are currently being adopted by the outdoor clothing industry.	Accepted, subject to further review of evidence relating to the C4 and C6 alternatives
		All perfluorinated and polyfluorinated chemicals should be excluded	Even the new C4 and C6 chemistries are persistent in the environment and are more mobile so are a cause for ongoing concern. Alternatives exist on the market already.	Technical reports suggest that C4 and C6 perfluorinated substances are the only water repellents currently able to match the performance of industry standard perfluorinated substances for high performance applications, particularly for synthetic fibres (Zero Discharge Hazardous Chemicals 2012). Whilst a number of new non-fluorinated water repellents have been released in the last 12 months (e.g. Clariant, Dow Corning) their performance, particularly in relation to dirt/stain repellency, their uptake by the market and their hazard profile are uncertain. A complete restriction would significantly restrict the Ecolabels potential in the outdoor clothing market and would not be in line with the Ecolabel Regulation. If a political decision is taken to restrict all fluorinated water repellents then it is proposed that any DWR would need to demonstrate an improved hazard profile, particularly with regards to persistence in the environment, and that PTFE membranes are still permitted as a core component of high performance technical outdoor wear. Membranes provide inherent function and are understood to perform 25-30% better than water repellents (Go Outdoors 2013).	Modified - Propose that alternatives demonstrate an improved hazard profile and PTFE membranes are permitted for high performance wear.
		Perfluorobutane sulfonate (C4) should be permitted	Perfluorobutane sulfonate (C4) has been shown to be non-bioaccumulative and of a low ecotoxicological hazard.	PFBS (375-73-5) is a substitute for water/dirt/stain repellents currently used in the market. It is understood that C4 and C6 alternatives are being phased in by outdoor clothing manufacturers. Although it does not have a harmonised classification, self-classifications do not indicate that it would be classified with hazards restricted by the Ecolabel. Concern has been expressed by some Member States about the persistency/mobility of short chain compounds. This evidence mainly relates to PFCA's. More information is required on potential degradation products.	Modified - It is a substitute with an improved hazard profile which can provide key functions in high performance outdoor clothing. Non-fluorinated alternatives would need to demonstrate an improved hazard profile e.g. persistence in the environment measured using CLP definition of rapidly degradable

		Appropriateness of PFAS and PFCA restrictions	Should the limit value apply to all PFOS substances. The PFCA limit values may be to restrictive.	The structure of the restrictions have been changed and is now based on chain length (see other related comments).	Modified - The proposed approach has been changed
	Recognition of other labels	Oeko Tex 100	Oeko Tex 100 is not considered to be a Type I label and is not always transparent.	Specific reference has been removed. It is highlighted instead that equivalent tests carried out for other textile certifications shall be accepted, with the aim of minimising the burden to applicants.	Accepted
			When will the Oeko Tex 100 read across matrix be finalised and how will it be maintained?	Specific reference to Oeko Tex has been removed, however, a read across could still be provided in the User Manual.	Modified - Read across could be maintained for the User Manual?
	Reporting threshold	Use of 0.1% threshold for SVHC's	0.1% is the reporting threshold for SDS but does not represent a safety limit.	0.1% is the reporting threshold for SVHC's that may be present in articles. It is also the derogation threshold referred to in the Ecolabel Regulation for SVHC's	Rejected - Threshold is dictated by legislation
	Risk of impurities in metal parts		The is a real risk of them containing heavy metals, as evidenced by high profile recent cases e.g. >1000 ppm lead in brass buttons in childrens wear. Reference should be made to regulatory standards already existing in REACH for lead and cadmium.	Testing for trace metals is proposed to be extended to metal components, with reference to Oeko-Tex 100 test methods	Accepted
	Substance group restrictions and limit values	NPEO/APEO limit value	Different views were submitted in relation to the sum total limit value. On one hand 50 ppm was seen as very difficult to achieve because, outside of the EU, these substances may be used to clean equipment. On the other hand these are substances of significant concern for this product group and evidence from licenseholders and recent NGO studies shows that 10-20 ppm can routinely be achieved. Limit values of 10 and 25 ppm were proposed.	A limit value of 20-100 ppm would represent industry best practice for the restriction of NPEO/APEO's. It is proposed to set the limit value at the low end of this range. This would signal that contamination must be minimised through better operating practices.	Modified - Value to set at lower end of the range of stakeholder proposals, 25 ppm.
		Metal complex dyes	Lift the use of metal complex dyes to the same requirements and derogations as specified in the GOTS	The issue was discussed earlier in the criteria process and the restriction has been tightened to exclude cotton and permit their use only where considered necessary to achieve certain colours on wool and polyamide fibres. GOTS permits copper dyes for blue, green and turquoise. Its market share is estimated to be less than 1-2%.	Rejected
		Wool AOX	There is information available on which to set AOX values but the AOX species are understood to be of little concern.	The requirements have been modified - a declaration is now all that is required.	

		Fibre and yarn spinning	The term primary spinning should be more clearly defined. It may only be applicable to synthetics following polymer extrusion.	References to clarify the point could not be found. The reference to primary has, however, been removed based on the comments received from both industry and CB stakeholders.	Accepted - The term has been broadened.
		Detergents, softeners and complexing agents	Anaerobic biodegradability should be restricted only to detergents with H400 classification.	The final industrial and institutional laundry detergent criteria require that all detergents should be anaerobically biodegradable. The proposal therefore represents an earlier compromise position from the criteria development process.	Rejected
			The DID list is under revision. Other sources may be more up to date. Applicants should not be forced to refer to the DID list.	The wording has been changed to state that the DID list should be a reference point for applicants.	Accepted
		Formaldehyde	Apply the strictest limits for formaldehyde (1.7.b) and to all textiles.	The proposal harmonises with the Oeko-tex certificate, noting that it has a separate but higher limit value for interior textiles (300 ppm). The Ecolabel is therefore stricter.	Rejected
		Extractable metals	Apply the strictest limits for extractable metals to all textiles.	The proposal harmonises with the Oeko-tex certificate, which differentiates between baby products and all other textile products. This is understood to reflect the different risk factors.	Rejected
		Nanomaterials	Restrict the use of nanomaterials until a proper toxicological and ecotoxicological assessment framework for nanomaterials is in place.	The Commission's position is that nanomaterials cannot be blanket restricted from the Ecolabel, however, specific substances may be addressed if there is sufficient precautionary evidence.	Rejected
14. Hazardous substance substitution	Assessment and verification	Verification by SDS is not practical	It is not practical for manufacturers to obtain SDS to EU specifications from non-EU suppliers. SDS are not required outside of the EU and if they are it is not usually in the extended form set out in the REACH Regulation. The unintended consequence could be false claims.	The minimum requirements are information according to REACH Annex VII. The reference to SDS forms part of all Ecolabel hazardous substance criteria and provides a standardised reference point for the information required. The reference to SDS in the RSL has been modified so that the requirement is for declarations supported where possible by SDS and/or analytical testing.	Modification of RSL verification requirements
		Compliance of SDS with REACH	There is a timeframe during which suppliers can make the transition to REACH Annex II requirements.	Reference is made to REACH registration requirements for substances (Annex VII, 1 tonne threshold) as a minimum requirement. The reference to Annex II requirements on SDS is intended to provide a common reference point for the quality of SDS. New text has been introduced into the criteria with verification options reflecting the differing potential status of substances.	Modified - New verification text has been introduced
	Finishing processes	Definition of 'finishing'	This term should be defined further as in some countries it can only refer to one production stage	A definition is to be provided in the pre-amble to the Decision. Definitions will also be provided for the other substance groups.	Accepted - Definitions to provided for process stages.
	General approach	The rules should follow the Chemicals Task Force	The rules should follow the Chemicals Task Force, inclusive of proposed amendments.	The proposed approach follows the proposals of the Chemical Task Force - notably the use of substance groups, hazard prioritisation and lifecycle derogation conditions.	Accepted

		Reference to H Classifications and R Phrases	The approach is problematic as it makes it difficult to check and may also rely on the producers assessment (self-classification). As far as possible requirements should be states in the restricted substance list.	The reference to H Classifications and R Phrases is a requirement for all Ecolabel product groups. Standard practice has been to have a clear listing of the hazards and derogations. This could be repeated within the RSL, but a separate listing should be retained in the criteria.	To be checked
		Functions should be core to textile production	Hazardous substances have been derogated for the use in textiles, even though the functions that they are intended to provide are note core for the production of textiles	The functions derogated have been agreed by stakeholders during several rounds of consultation as being those required for the product group. Where possible the derogations have been made more specific (e.g. optical brighteners) or removed where new evidence suggests that they are not required.	Clarification
	H classifications and R phrases	Read across to R Phrases (DSD system)	Hazard classifications that do not have a corresponding risk phrases should be removed from the criteria listing.	The hazard classification listing is a standard list developed by DG ENV and as such must be used for each product.	Rejected
	Substance group derogations	Distinguishment between dyes and pigments	Differentiate between dyes and pigments as evidence from licenseholders is that the hazard profile. There is also concern about H317 and H334 as the pigment remains on the product.	Subject to further information forthcoming from stakeholders no specific derogation is proposed for pigments. Dyes are increasingly used for printing so these will fall under the dyestuff derogation.	Accepted
		Colour removal from wastewater	This condition should be considered as case to case BAT	The proposal has been modified - for dyes known to have lower fixation rates a BAT technique must be selected from a number of options that maximise fixation/optimize process control and/or minimise wastewater pollution. Colour removal is one BAT option.	Accepted - A list of BAT options are provided.
			The requirement concerning colour removal is unclear. Who should decide whether colour removal is required or not?	The requirement is an option to comply with the derogation condition for dyestuffs used in dyeing and printing. The decision is to be made by the applicant.	Clarification
		Softeners with allergen hazards	Derogation of H317/R43 and H334/R42 should be reviewed because evidence from licenseholders suggests that it is not justified (10 out of a sample of 14 softeners used are without hazard classifications).	The comment has been cross referenced with the draft final version of a report from the European Commission ' <i>regarding possible new labelling requirements of textile products and on a study on allergenic substances in textile products</i> '. This included the screening of softeners for H317 and H334. Only a limited number of softeners were highlighted.	Accepted
		Use of hydrogen peroxide bleach	Is hydrogen peroxide bleach permitted? There may be other process chemicals with aquatic hazard classifications and it must be clear if they are permitted or not.	The use of hydrogen peroxide bleach is not restricted by the Ecolabel (see Annex 1, Restriction 2).	Clarification
		Processes to which the criteria applies	A more generic reference should be made to process stages because the substances referred to may be used at other stages.	The criteria is a requirement that relates to the final product only. The derogations relate to substance groups that are understood from scientific evidence to remain on the final product. The criteria will therefore not apply to most process chemicals, apart from those specifically highlighted and/or derogated.	Clarification

		Use of flame retardants	The restriction should not be as limiting. Industry standards and public bodies may require their use.	The wording has been modified in order to include public bodies that may wish to specify their use. The proposed approach is a compromise as a number of Member States have requested a complete restriction on their use.	Modified - Accepted for public bodies
			Please can you confirm that 1) the use of flame retardants is not excluded by default and all flame retardants can always be used, as long as they comply with criterion 14 and as long as they are not listed on the RSL in Annex 1. 2) derogations for the listed hazards will only be granted if fire safety is required by standards or legislation	Yes, these statements are correct according to the current proposal, with the addition of public procurement requirements.	Clarification
		Optical brighteners	A complete ban on optical brighteners would exclude around 30% of all products and nearly all fabric prints. If the EU Ecolabel criteria are to be used for public procurement then white uniforms must be permitted to use brighteners.	It is proposed that the derogation is made much more specific to permit only: 1) white coloured printing 2) enhanced brightness in uniforms and workwear 3) additives during the production of polyamide and, polyester with a recycled content and acrylic fibres (reflecting GOTS).	Modified - the derogation has been reviewed and made more specific
		FR Antimony synergist	The derogation of H351 raises concerns and may be subsequently promoting the use of brominated flame retardants in Ecolabelled products. The derogation should be made specific.	The synergist is required in combination with substitutes for decaBDE and the alternatives (such as zinc borate) can only provide partial substitutes and not in all applications. The derogation has been made more specific and a condition applies to the area of greatest exposure - i.e. the workforce applying the FR to the textile.	Modified - the derogation has been reviewed and made more specific
		Auxiliaries	Auxiliaries which are toxic in contact with skin (H311) should be banned in any case as skin contact for apparel fabrics is intended.	The intention of the derogation is to encompass auxiliaries that may be present as a process carry-over. Concentrations are likely to be at trace levels. In response to the concerns raised a concentration limit of 1.0% has been added as a condition for H317 and H311, in-line with CLP rules.	Modified - A concentration limit has been added as a condition.
15. Process efficiency	Assessment and verification	Requirement for audit of production sites	Site audits would be required and should therefore be mandatory in the criteria document.	It is proposed that compliance is demonstrated by the minimum items of evidence listed.	Rejected
			An onsite visit is always an extra insurance and should only be mandatory for central criteria, like the use of chemicals.	The original reference to a site visit may be too onerous for complex supply chains. Instead a requirement for energy monitoring/management has been added, reflecting tools such as SAC's Higg Index and as proposed for GOTS.	Modified - a requirement for monitoring and management has been added.
			Energy benchmarks would be more effective than techniques because the latter are reliant on operator practices. This approach is being reviewed by GOTS.	Benchmarks were explored but were too complex to implement. The benchmarking tool being explored by GOTS has been investigated but would require discussion and validation. A requirement for energy use to be measured and benchmarked as part of an energy management system has instead been added.	Modified - EMS has been added to ensure techniques are not implemented in isolation.

	BAT techniques	Selection criteria for BAT techniques	It is not clear on what basis the BAT techniques were selected. It would be difficult for CB's to verify alternative techniques. The list of techniques should be expanded to reflect the textile BREF and work by the German UBA.	The specific techniques are the result of a comprehensive screening of the BREF document (see September 2012, Product Bureau website, Annex 5.1). The techniques were identified by cross-referencing improvement areas identified by the IMPRO LCA study with the textile BREF supplemented by techniques addressed by the case studies in Annex 5.2 (e.g. NRDC on energy and water use, which have been developed in conjunction with Chinese textile mills). The techniques were mainly selected for their energy savings potential in the production stages highlighted in the IMPRO LCA results. Some of these techniques also deliver combined savings in water and chemical use. Following feedback the proposal has been revised to focus only on washing and drying processes, being generic to many process stages and more easily verified.	Modified - The proposal has been revised to focus on washing and drying efficiency.
		Differentiation by production scale	The distinction based on the size of the company is not needed. Applicants should fulfill the same requirements regardless of size.	The distinction by size was specifically requested by industry stakeholders in order to be in line with the IED Directive.	Rejected
		Transition of existing ecolabelled supply chains	If existing suppliers are unable to comply then this would have consequences for the supply chain and production processes.	The scope of the criteria proposal has been reduced in order to make it more accessible and easier to verify.	Modified - the proposal has been revised.
16.1 Wastewater discharges	Assessment and verification	Time period for measurement of COD	Over what time period and for what production shall this be measured?	Monthly averages for production at the site for the six months preceding the application are proposed. This requirement has also been clarified for wool scouring.	Accepted
	COD limits	COD limit prior to discharge	The COD limit prior to discharge to the environment should be removed. This is because in some countries major investment has been made in centralised wastewater treatment infrastructure e.g. China. On-site works are now used to recover and recycle rinse liquors. Moreover the effectiveness of an 85% reduction will depend on the COD of the wastewater.	The effluent discharge COD limit value has now been removed.	Accepted
	Hard to biodegrade substances	Mineralisation and colour removal	The proposal for 90% mineralisation is considered to be unmeasurable. Colour removal would act to also remove textile auxiliaries. The effectiveness of a % limit value is questioned as it will be dependant on the fixation/exhaustion achieved by the dyeing process.	Case studies in the textile BREF suggest that 20g COD/kg will achieve a high level of mineralisation of textile auxiliaries, a separate requirement will therefore be deleted. Colour removal is proposed to be retained as a requirement linked to the derogation of dyes. A percentage reduction in colour has been replaced by absolute values taken from the Blue Angel criteria for textiles.	Accepted, with introduction of an absolute measurement of colour removal
	Scope of criteria	Treatment of additional parameters	Additional parameters for inclusion could include copper, nickel, zinc, AOX and ammonium nitrate. These relate to dyeing and printing processes.	It is understood from the textile BREF that 20g COD/kg will be effective in removing hardly biodegradable effluents. It is proposed to include colour removal which is also understood to remove other non-biodegradable auxiliaries.	Modified - Colour removal specified.

16.2 Emissions to air	Scope of criteria	Alignment with VOC Directive	The criteria should be aligned to the VOC Directive 99/13. The current proposal would represent a new approach for the industry.	The approach proposed was based on the textile BREF and is also used by Bluesign, with evidence to successful compliance by the industry. However, following review the criteria have been aligned with provisions for textile finishing contained within the VOC Directive.	Accepted
		Clarify emissions included	Clarification is required of the types of emissions included within the criteria.	The criteria relates to VOC emissions from finishing processes, including thermosetting, thermosoling, coating, impregnating or finishing of textiles and the respective drying facilities.	Clarification

EU Ecolabel for textile products: Stakeholder table of comments - fitness for use criteria					21/10/2013 v3
Reference	Criteria or subject	Aggregated theme	Summary of stakeholder comments	JRC-IPTS response	Accepted, rejected or modified?
17. Dimensional changes	Drying procedure	Tunnel finisher and tumble drying	What should happen if the textile is labelled with both forms of drying.	Tumble drying has been fixed for domestic washing cycles. For industrial washing the reference shall be the label.	Modified - Reference to the label for industrial washing.
	Labelling instructions	Dual labelling for washing	What should happen if the textile is labelled with domestic and commercial wash temperatures?	The criteria verification has been clearly separated into domestic and commercial washing conditions.	Accepted
	Specific reference to socks	Testing based on determination of sock size	A specific point should be added for socks as there is a specific method within ISO 6330:A1 2008 which considered retention of sock size.	No reference could be found to socks in the new version of the standard (2012) - to be followed up with the stakeholder.	Follow-up with stakeholder
			There is no update for socks. A proposed reference value is +/- 8 %.	No reference could be found in recent updates of the listed standard.	Accepted
18. Colour fastness	Appropriateness of standard	Retention of ISO 105 C06	It is necessary to retain the reference to ISO 105 C06 at appropriate temperatures.	The reference has been re-inserted accordingly, accompanied by ISO 15797 for thr washing procedures.	Accepted
23. Fabric resistance to pilling	Appropriateness of the standard		Pilling should not be added as there are already a lot of criteria	Pilling was identified as a major area of focus for improving the fitness for use criteria. It is a cause of early discard of garments by consumers and there is a substantial body of industry research to address the issue.	Rejected
	Pilling rating and verification	Rating for wool and wool acrylic	A rating of 4 is too difficult to meet for pure new wool and wool acrylic blends. A rating of 2-3 is proposed as a good and achievable performance.	The rating required has been reduced to 3.	Accepted
		Specification of Pill Box method	ISO 12945-1 Pill Box would be more appropriate for knitted fleece because the ISO12945-2 Martindale method would not be practical because of the lack of stability of the knitted structure.	The test methods have now been differentiated into fleece/non-wovens made of wool/wool blends/polyester and woven cotton.	Accepted
		Requirements for tights and leggings	Concerning the rating for PA microfibers for tights and leggings a specific rating of 2-3 is proposed.	Accepted, the proposal has been added to the criteria.	Accepted

24. Durability of function	Scope and approach	Fibre strength	A minimum limit for fibre strength on for woven (not tricot) everyday clothes would be valuable and should be included	These were briefly explored earlier in the process but the range of applications was too broad. It is proposed to include these requirements within the GPP criteria.	Rejected within the scope of the EU Ecolabel
	24a Water and stain repellent function	Appropriateness of 50 wash cycle requirement	Few waterproof garments are washed more than 10 times during their lifespan. A durability of between 5 and 10 wash cycles is proposed. Wear and tear are more significant mechanisms for product failure. Moreover 75 oC would be destructive to most seam sealings. The best test method for water repellents would be Bundesmann combined with laundry cycles.	A report commissioned by the Outdoor Industry Association (November 2012) was consulted in order to refine the performance and test method. The report defines expected performance ratings for a range of performance clothing. Ratings have been introduced for water, dirt and stain repellency relating to specific ISO standards. 20 wash cycles are specified.	Modified - Ratings and wash cycles have been specified based on industry literature. The industrial temperature for water repellents requires reviewing.
		Drying conditions	The drying conditions should be specified as these assist in re-activating the function.	Drying conditions and associated test standards have now been added.	Accepted
	24b Flame retardant function	Performance rating	The function should be retained fully after 50 wash cycles at 75 oC.	The performance requirement has been updated accordingly, together with the appropriate ISO testing standard.	Accepted
			The function should be retained fully after 20 wash cycles at 75 oC.	Stakeholder manufacturers have confirmed that 50 wash cycles is a realistic performance for coatings and additives.	Rejected
		Semi-durable flame retardants	Semi-durable flame retardants would reduce the fire safety performance of interior textile products. Curtains, drapes and upholstery textiles have to be cleaned to remove dust and dirt as they result in poor testing results.	The flame retardant industry proposed the use of semi-durable standards for interior textiles. It is not clear that such products exist on the market that are durable.	Input is requested from FR stakeholders
	24c Easycare function	Reduction in SA performance standard	The performance standard should be reduced to SA-3 so as not to penalise fabrics with a high natural fibre content.	The performance rating has been reduced accordingly, but further input if required to confirm the identified weakness for natural fibres.	Accepted
		Rationale for the criteria	Why is only 10 domestic wash cycles specified for Easycare? This value does not seem to be demanding in the light of possible formaldehyde concentrations.	The rating is understood to represent a very good performance for Easycare based on industry input.	Clarification

	Softness function	Identification of test methods	Softeners may be applied at a number of process stages. There are no qualitative methods that can be used to objectively assess softness.	Softeners are to be deleted because no qualitative test methods could be identified.	Accepted
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EU Ecolabel for textile products: Stakeholder table of comments - CSR criteria					21/10/2013 v3
Reference	Criteria or subject	Aggregated theme	Summary of stakeholder comments	JRC-IPTS response	Accepted, rejected or modified?
25. ILO Core labour standards	Basis for retaining the criteria	Support to retain the criteria	There is strong support for maintaining social requirements and to single out relevant production sites in order to keep it manageable for applicants. Third party verification is supported.	This issue is in the public eye due to recent incidents but it does require strict verification if a pass/fail approach is to be followed.	Accepted
	Production sites and processes	EU production sites	European production sites should not be deemed to meet all ILO criteria.	The clause has been deleted.	Accepted
			It was requested to extend the scope to weaving and dying sites.	Due to the strict verification requirements and uncertainty over the possible impact on licenses it is proposed to keep the focus on the last production stage.	Rejected
	ILO standard C155	Occupational health and safety	Although the Ecolabel for textiles contains a lot of criteria addressing chemicals this does not cover all industrial risks.	Health and safety has received greater attention as a result of a number of high profile recent incidents at factories supplying major EU brands and retailers.	Accepted - The ILO Standard has been added.
	Social Task Force	Harmonisation with STF results	The criteria proposal should be harmonised with the results of the Social Task Force.	The criteria proposal is to be discussed in the context of the STF at the June EUEB.	To be discussed at the EUEB
	Assessment and verification	Reporting on compliance	How comprehensive should the reports compiled from production sites be? A signed code of conduct could be sufficient enough.	A recent review of social compliance schemes by MADE-BY and discussions at the STF suggest that more rigorous verification would be required to ensure credibility.	Clarification - verification requirements have been strengthened
26. Sandblasting	Mechanical sandblasting processes	Forms of machinery to which it applies	EU textile machinery manufacturers are understood to supply sandblasting equipment that minimises risks to workers. The process is enclosed and fully ventilated.	Brands supporting anti-sandblasting campaigns by organisations such as the Clean Clothes Campaign are moving towards bans on manual and mechanical sandblasting. The use of modern, enclosed processes could, however, be considered for derogation from the criteria.	Consult with Clean Clothes Campaign on possible derogation