Preparatory Study on textiles for product policy instruments – the initial questionnaire

Fields marked with * are mandatory.

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The respondent to this questionnaire will be able to skip specific sections that are not of interest.

1. Introduction

Political context

On 30 March 2022, the European Commission (EC) adopted a proposal for a Regulation on Ecodesign for Sustainable Products (ESPR) (COM(2022) 142 final). The ESPR delivers on the commitments made in both the European Green Deal (COM(2019) 640 final) and the Circular Economy Action Plan (COM(2020) 98 final) to make the EU regulatory framework fit for a sustainable future and to ensure that products placed on the EU market become increasingly sustainable.

The ESPR aims to reduce the environmental impacts of products across their life cycles and to improve the functioning of the EU's internal market. It proposes to do this by building on the successful approach pioneered under the current Ecodesign Directive (2009/125/EC), which applies to energy-related products only. The ESPR proposes to extend the Ecodesign Directive to cover a very broad range of physical products and to strengthen its provisions. This would enable the ESPR to set a range of far-reaching performance- and information-related requirements – known as 'ecodesign requirements' – for specific product groups, to improve product circularity, energy performance and other environmental sustainability aspects. A Digital Product Passport shall be required to hold and convey the information in question, with traceability features. For groups of products that share a set of common characteristics, horizontal rules could be set. The proposal will enable ecodesign requirements to be set on a wide range of aspects, including:

- product durability, reusability, upgradability and reparability
- the presence of substances that hinder circularity
- energy and resource efficiency
- recycled content
- remanufacturing and recycling
- carbon and environmental footprints

The ESPR provides a general framework for these rules, with specific product requirements to be set at a later stage via delegated acts dedicated to a particular product or to groups of similar products. These delegated acts may also set mandatory Green Public Procurement (GPP) criteria for public contracting authorities.

Together with the ESPR proposal, the Commission presented the EU Strategy for Sustainable and Circular Textiles (COM(2022) 141 final) which aims, inter alia, to tackle fast fashion and textile waste and to make textiles more durable, reparable, reusable and recyclable. The Strategy lays out a forward-looking set of actions, which includes setting ecodesign requirements for textiles under the new ESPR framework. The Strategy also announces a revision of the EU Ecolabel criteria for textiles to support its uptake among producers and offer consumers an easily recognisable and reliable way to choose eco-friendly textile products.

In order to support the fulfilment of these commitments, the Commission has launched a preparatory study by the Commission's Joint Research Centre, to provide scientific evidence for the future development of ecodesign requirements, GPP requirements and a revision of the EU Ecolabel criteria for textiles (Commissi on Decision 2014/350/EU). Results of this survey will also feed into work carried out by the Joint Research Centre on post-consumer textile sorting and recycling and on textile end-of-waste criteria.

This questionnaire

This questionnaire is targeted at stakeholders with specific interest and expertise in the area of textiles. It aims to collect feedback and information on numerous aspects to be investigated in this preparatory study. The questionnaire includes four compulsory sections, followed by facultative sections on more targeted aspects.

Compulsory sections:

- 1. Introduction, which provides the context and aim of the questionnaire
- 2. Respondent details, which collects information on the kind of respondent
- 3. Definitions, which seeks feedback on definitions used
- 4. Scope, which seeks feedback on a preliminary version of the scope

Facultative sections that the respondent may choose to skip:

- 5. Market analysis, which collects market-related data
- **6. User behaviour**, which collects references to studies analysing the behaviour of users when buying, using and disposing of textile products

included in the scope reported in Section 4

- **7. Ecodesign aspects**, which collects opinions on the most effective and applicable potential ecodesign actions
- 8. EU Ecolabel, which collects opinions on the current EU Ecolabel criteria
- 9. EU GPP, which collects opinions on the current experience of users of voluntary EU GPP criteria
- 10. Additional questions for Industry and Industry Associations

This survey is launched on Thursday 30 March, and it will be closed on Monday 24 April 2023 at 23:59. Following this first targeted questionnaire, the JRC will assess the feedback received and integrate it in the preparatory study. The Commission will carry out further rounds of consultations on draft versions of the preparatory study, and over the course of the impact assessment of ecodesign requirements, before adopting any specific and horizontal rules under the ESPR and before adopting any EU Ecolabel criteria under Regulation 66/2010.

Online public consultation on the prioritisation of product requirements

In January 2023, the Commission launched an online public consultation (available at this <u>link</u>) on what the new product priorities under the ESPR should be, based on a preliminary analysis by the Joint Research Centre (JRC) (available at this <u>link</u>). Among the shortlisted end-use products considered in the preliminary analysis, textiles and footwear have received the highest combined score in terms of environmental impacts and of the improvement potential. The online public consultation will be open until 12 May 2023, and your feedback is also very much welcomed, in addition to feedback to the present questionnaire, which pertains specifically to textiles in more detail.

Confidentiality of data and information provided

Data and information provided via this questionnaire will be treated confidentially and complying with the General Data Protection Regulation (Regulation 2016/679). Therefore, data will be treated for the development of EU policies on textiles and it will be of the exclusive use of the European Commission. The European Commission will process data and information complying with Regulation 2018/1725. For more information, please, visit this link.

2. Respondent details

* 2.1. Registration as stakeholder

A registered stakeholder will be able to comment on the preparatory study and participate in three on-line consultations, which will focus on specific parts of the process.

Do you want to be registered as a stakeholder in the development of the "Preparatory study on textiles for product policy instruments"?

Yes
No

2.1.1. In 2.1., you expressed your interest in being registered as a stakeholder.

Please, first fill out the tables below

	First name	Last name	Organisation	Street and number	Post code	City	Country
	(e.g. Saverio)	(e.g. Bitte)	(e.g. Ancientextiles)	(e.g. Calle Piripi 56)	(e.g. 51519)	(e.g. Málaga)	(e.g. Spain)
*							

	E-mail address (e.g. saverio.bitte@ancientextiles. com)	Telephone Number (e.g. 0034 22352XXYY)	Organisation Website (e.g. ancientextiles.com)
. *			

☐ I hereby consent to the European Commission processing and collecting my personal data. I am aware that I can exercise my personal data rights by contacting the European Commission via the functional mail box JRC-B5-PRODUCT-BUREAU@ec.europa.eu and specifying that data were collected in this specific questionnaire.
Second, follow the directions reported at this <u>link.</u>
Third , after sending the request to be a stakeholder, please register on BATIS, which is the platform that will be used in the consultations for the development of the "Preparatory study on textiles for product policy instruments". Please follow the directions reported at this <u>link.</u>
*2.2. Type of respondent Which of the following options best represents your type of organisation/institution/interests?
University or research institute Certified laboratory Government (local, regional, or national) Non-governmental organisation – Environment Non-governmental organisation – Consumers Industry – manufacturing Industry – manufacturing - association Industry – waste collection, sorting and treatment Industry – waste collection, sorting and treatment Distributer/Retailer Distributer/Retailer association Other
If 'Other', please specify
50 character(s) maximum
2.2.1. In 2.2, you have selected "Government (local, regional, or national)". Please, choose one:
Member State – market surveillance authority
Member State – customs authority
Member State – National level - other
Member State – part of the EU Ecolabelling Board – Competent Body
Member State – part of the EU Green Public Procurement Advisory Group Region of the EU Green Public Procurement Advisory Group
Regional government - other

If 'Other', please specify

Other

Local government - other

50 character(s) maximum
2.2.2. In 2.2., you have selected "Industry" or "Distributer/Retailer".
Which is the size of your organisation?
micro enterprise: self-employed
micro enterprise: fewer than 10 persons employed
small enterprise: 10 to 49 persons employed
medium-sized enterprise: 50 to 249 persons employed
large enterprise: 250 or more persons employed
2.2.3. In 2.2., you have selected "Industry - manufacturing" or "Industry - manufacturing -
association".
Please - choose one or more market segments targeted:
Apparel
■ Home/Interior Textile
Reusable hygienic products
Designer
Other
If, "Other", please specify
50 character(s) maximum
2.2.4. In 2.2., you have selected "Industry – waste collection, sorting and treatment" or "Industry –
waste collection, sorting and treatment – association".
Please, specify the market segments targeted:
Collection
■ Sorting
Recycling
Other
- Other
If !Other! places enecify
If 'Other', please, specify
50 character(s) maximum
O. C. In O. C. was been calcuted "Distributed Distributed Distribu
2.2.5. In 2.2., you have selected "Distributer/Retailer".
Please, specify the market segment targeted:
Distribution
Retail
Other
If 'Other', please, specify

2.2.6.In 2.2., you have selected "Industry - manufacturing" or "Industry - manufacturing - association". Which is the part of the supply chain that you work in or represent? Please select all that might apply: Raw materials-natural fibres Garment processing Production of man-made fibres Cut/Make/Trim (CMT) of technical textiles (other than garments) Materials processing/Fibre preparation Brands-Buying Yarn preparation Sustainability Fabric manufacturing Brands-Design Cut/Make/Trim (CMT) of garments If 'Other', please, specify 50 character(s) maximum
which is the part of the supply chain that you work in or represent? Please select all that might apply: Raw materials-natural fibres Cut/Make/Trim (CMT) of technical textiles (other than garments) Materials processing/Fibre preparation Brands-Buying Yarn preparation Sustainability Fabric manufacturing Brands-Design Cut/Make/Trim (CMT) of garments If 'Other', please, specify
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Raw materials-natural fibres Garment processing Production of man-made fibres Cut/Make/Trim (CMT) of technical textiles (other than garments) Materials processing/Fibre preparation Brands-Buying Yarn preparation Sustainability Fabric manufacturing Brands-Design Fabric processing Other Cut/Make/Trim (CMT) of garments If 'Other', please, specify
Raw materials-natural fibres Garment processing Production of man-made fibres Cut/Make/Trim (CMT) of technical textiles (other than garments) Materials processing/Fibre preparation Brands-Buying Yarn preparation Sustainability Fabric manufacturing Brands-Design Fabric processing Other Cut/Make/Trim (CMT) of garments If 'Other', please, specify
Production of man-made fibres
Materials processing/Fibre preparation Brands-Buying Yarn preparation Sustainability Fabric manufacturing Brands-Design Fabric processing Other Cut/Make/Trim (CMT) of garments
Yarn preparation Fabric manufacturing Fabric processing Cut/Make/Trim (CMT) of garments If 'Other', please, specify
Fabric manufacturing Fabric processing Cut/Make/Trim (CMT) of garments If 'Other', please, specify
Cut/Make/Trim (CMT) of garments If 'Other', please, specify
If 'Other', please, specify
30 Character(S) maximum
2.2.7. Are you a "Holder of ISO Type I ecolabel licence, e.g. EU Ecolabel, Blue Angel, Nordic Swan
Ecolabel".
Please choose one:
at most 1 choice(s)
EU Ecolabel Other
If 'Other', please, specify
50 character(s) maximum
2.3. Experience with product policy development
Your organisation/institution
has been actively involved with the development of ecodesign criteria for other product groups
has been actively involved with the development of EU Ecolabel criteria for this product group
is in the process of applying for an EU Ecolabel licence for this product group
is considering applying for an EU Ecolabel licence for this product group
None of the above
Please justify your answer
500 character(s) maximum
E.g. We are actively involved in the EU Ecolabel scheme because we think that EU Ecolabel supports our
marketing choice.

3. Definitions

In this section, specific definitions are proposed. Most of them draw inspiration from existing legislation and conventional use in the industrial community.

* 3.1. Definition of "textile product"

The following definition is inspired by the Textile Labelling Regulation (Regulation 1007/2011).

"Textile product" means any raw, semi-worked, worked, semi-manufactured, manufactured, semi-made-up or made-up product which is exclusively composed of textile fibres, regardless of the mixing or assembly process employed, as well as a product containing at least 80% textile fibres in weight.

Do yoι	u think that the	definition of the	e textile prod	uct should be	changed?
	No, the definition	on is adequate a	and does not n	eed to be char	iged

Yes

No opinion

Minor changes should be incorporated

Other

Please, if necessary indicate how the definition could be changed.

In particular, indicate potential changes with regards to the last part "as well as a product containing at least 80% textile fibres in weight". Please provide reasons for your suggestions.

500 character(s) maxi	imum		

* 3.2. Non-textile parts in a textile product

The following approach to non-textile parts is proposed:

Non-textile parts in the textile product shall, as a rule, not exceed 20% in weight of the total textile product weight. Notwithstanding, certain predefined non-textile parts or components may be disregarded in the calculation of the percentage in weight of textile fibres for specific products or product categories.

This rule is intended to incorporate into the scope specific products with particularly heavy non-textile parts but nonetheless deemed to be composed of important textile parts and closely linked to textile products, as generally defined.

Do you think that this should be changed?

No, the limitation is adequate and does not need to be changed	angeo
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Yes

No opinion

Minor changes should be incorporated

Other

Please indicate how this approach could be changed.
500 character(s) maximum
3.3. Definition of "textile component" of a textile product
"Textile component" means any raw, semi-worked, worked, semi-manufactured, manufactured, semi-made- up or made-up separately identifiable or separate part of a product which is exclusively composed of textile fibres, regardless of the mixing or assembly process employed.
This definition is inspired by the Textile Labelling Regulation (Regulation 1007/2011). Do you think that the definition should be changed?
No, the definition is adequate and does not need to be changedYes
No opinion
Minor changes should be incorporatedOther
Please indicate how the definition could be changed.
500 character(s) maximum
3.4. Definition of "non-textile component" of a textile product
"Non-textile component" means any component, which is a separately identifiable or separate part of the textile product and which is not a textile component. Non-textile components include buttons, zippers, sequins, Velcro closing, other plastic or metal components, components of animal origin (such as leather, fur, feathers/down, bone/horns and pearls), etc.
This definition is inspired by the Textile Labelling Regulation (Regulation 1007/2011). It aims to distinguish product components from product parts in general. Do you think that the definition should be changed?
No, the definition is adequate and does not need to be changedYes
No opinion
Minor changes should be incorporatedOther
Please indicate how the definition could be changed.
500 character(s) maximum

* 3.5. Definition of "integral part" of a textile product

An "integral part" shall be understood to mean a part of the product that is neither separate nor separately identifiable through normal observation.

Accordingly:

- printings, coatings, laminations and similar parts of fabrics are, as a rule, non-textile components of textile products,
- fatty substances, binders, weightings, sizings and dressings, impregnating products, dyeing and printing products and other textile processing products are, as a rule, non-textile integral parts of textile products.

This definition is inspired by the Textile Labelling Regulation (<u>Regulation 1007/2011</u>). It aims to characterise product parts that are not product components. Do you think that the definition should be changed?

changed?
 No, the definition is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
Please indicate how the definition could be changed.
500 character(s) maximum
3.6. Definition of "textile part" of a textile product
A "textile part" of a textile product means either a textile component or an integral part of a textile product which is exclusively composed of textile fibres, raw, semi-worked, worked, semi-manufactured, manufactured, semi-made-up or made-up, regardless of the mixing or assembly process employed.
This definition is inspired by the Textile Labelling Regulation (Regulation 1007/2011). Do you think that the definition should be changed?
No, the definition is adequate and does not need to be changed
O Yes
 No opinion Minor changes should be incorporated
Other
Please indicate how the definition could be changed.
500 character(s) maximum

* 3.7. Definition of "non-textile part" of a textile product

A "non-textile part" of a textile product means either a 'non-textile component' or an integral part of a textile product which is not exclusively composed of textile fibres.

definition should be changed?
No, the definition is adequate and does not need to be changed
Yes
No opinion
Minor changes should be incorporated
Other
Please indicate how the definition could be changed.
500 character(s) maximum

This definition is inspired by the Textile Labelling Regulation (Regulation 1007/2011). Do you think that the

3.8. Definition of "technical textile"

The table below reports three definitions of technical textiles with the corresponding ID numbers and references.

Possible definitions of technical textiles

ID	Reference	Definition
01	CCMI/105, Technical textiles, Brussels, 17 April 2013, OPINION of the European Economic and Social Committee on Growth Driver Technical Textiles. (own initiative opinion). Rapporteur: Ms Butaud-Stubbs. Co- rapporteur: Ms Niestroy. Available at this link	Technical textiles are textile products meeting technical rather than aesthetic criteria, even if, for certain markets like work wear or sports equipment, both types of criteria are met. Technical textiles bring a functional answer to a wide range of specific requirements: lightness, resistance, reinforcement, filtration, fire-retardancy, conductivity, insulation, flexibility, absorption and so on. The definition does not depend on the raw material, the fibre or the technology used, but on the end-use of the product itself.
02	Aldalbahi, A.; El-Naggar, M.E.; El-Newehy, M.H.; Rahaman, M.; Hatshan, M.R.; Khattab, T. A. Effects of Technical Textiles and Synthetic Nanofibers on Environmental Pollution. Polymers 2021, 13, 155. https://doi.org/10.3390/polym13 010155	A technical textile is a textile product manufactured mainly for its technical and performance characteristics rather than its artistic or ornamental features
03	Encyclopaedia Universalis, H. Laurent,G. Némoz, Universalia 1995, PP 184-188.	Technical textiles are textile products meeting high technical and quality requirements (mechanical, thermal, electrical, durability) giving them the ability to offer technical functions.

- ID 01
- O ID 02
- ID 03

OtherNo opinion
Please justify your answer and if necessary suggest another definition with its reference. 500 character(s) maximum
* 3.9. Definition of "functional textile" The following definition was taken from CEN ISO/TR 23383:2020 - Textiles and textile products - Smart (Intelligent) textiles - Definitions, categorisation, applications and standardization needs (ISO/TR 23383: 2020).
"Functional textiles" means textile materials produced with inbuilt functionalities to meet the end-use requirement apart from their basic purpose. Therefore, they have integrated functions of controlling or adjusting based on the intended application.
Do you think that the definition should be changed? No, the definition is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
Please indicate how the definition could be changed. 500 character(s) maximum
*3.10. Definition of "smart textile" The following definition was taken from CEN ISO/TR 23383:2020 - Textiles and textile products - Smart (Intelligent) textiles - Definitions, categorisation, applications and standardization needs (ISO/TR 23383: 2020).
"Smart textiles" means textiles able to sense and react to environmental conditions and external stimuli (e. g., mechanical, thermal, and chemical stimuli) thanks to a number of sensors incorporated in the textiles.
Do you think that the definition should be changed? No, the definition is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
Please indicate how the definition could be changed. 500 character(s) maximum

* 3.11. Definition of "emotional durability" The following definition was taken from WRAP, Clothing Durability Report, 2015. "Emotional durability" means a product's ability to stay relevant and desirable to the consumer. Do you think that the definition should be changed? No, the definition is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other Please indicate how the definition could be changed.

4. Scope

500 character(s) maximum

The definition of the scope for this study followed the selection criteria based on Article 16 (a, b, c) and Article 5(2) of the ESPR legislative proposal. Note that Article 16 (d) does not apply because there is no delegated act on textile products to be assessed.

Accordingly, Article 16 sets the following selection criteria:

- a) the potential for improving the product aspects listed in Article 5(1) without entailing disproportionate costs:
- b) the volume of sales and trade of the product within the Union;
- c) the distribution of the environmental impacts, energy use and waste generation across the value chain, in particular whether they take place within the Union.

Article 5(2) states that, where two or more product groups display technical similarities allowing a product aspect to be improved based on a common requirement, ecodesign requirements may be established horizontally for those product groups.

In the textile product group, the JRC identified the following subgroups: (1) apparel, (2) home/interior textiles (e.g. bed linen, towels, tablecloths, curtains), (3) footwear and (4) technical textiles, such as truck covers and cleaning products, or specifically meant for industry (automotive, construction, medical, agriculture, etc.).

Analysis by the JRC of the volume of sales and trade of the textile products within the Union showed that the most relevant textile subgroup is apparel, which covers the largest share of production, export and apparent consumption.

The review of the available literature showed that apparel is the textile subgroup in the textile ecosystem that has the highest environmental impacts and that it is the most investigated subgroup. The analysis on potential improvement showed that apparel, and also to some extent home/interior textiles and footwear, have a large potential for improvement considering ecodesign criteria set in Article 5(1) of the ESPR

proposal.

The product categories proposed to be included in the scope of this study include:

- a) nine apparel categories, which follow the classification applied in the PEFCR project on apparel (available at this link);
- b) four categories of home/interior textiles, because they are assumed to have technical features very similar to those already included in point (a) of this list;
- c) a category of reusable absorbent hygiene products, because they are assumed to have technical features very similar to those already included in point (a) of this list.

The table below describes the list of products included in the scope.

List of products included in the scope

ID	Product category	Description of products included
01	T-shirts	Garment to cover the upper body to the elbow (e.g., singlets, vests, t-shirts, polo shirts, other short-sleeved shirts)
02	Shirts and blouses	Garment to cover the upper body including the entire arm (e.g., long-sleeved shirts, blouses, base layers)
03	Sweaters and mid- layers	Garment to keep the upper body warm and covered (e.g., pullovers, cardigans, hoodies, jerseys, sweatshirts, sweaters)
04	Jackets and coats	Garments to put on top of a shirt or sweater or to protect from the natural elements (e.g., blazers, suit jackets, overcoats, other light jackets, rain jackets, outdoor winter jackets, parkas, outdoor vests, anoraks)
05	Pants and shorts	Garment to cover the lower body, may protect from the elements (e.g., casual pants, outdoor pants, dress pants, jeans, sports pants, capri pants, shorts)
06	Dresses, skirts and jumpsuits	One-piece garment that covers both the upper and lower body, or the lower body only, other than pants and shorts (e.g., short- and long-sleeved, strapless, wrap, long and short, one-piece suits)
07	Leggings, stockings, tights and socks	Tight garment to cover the legs and/or feet (e.g., opaque and sheer tights, pantyhose, fishnets, ankle socks, knee socks, low-cut socks)
08	Underwear	Garment worn under clothes, often next to the skin of the upper or lower body (e.g., boxers, briefs, panties, bras, body-shaping suits)
09	Swimwear	Garment worn for water-based or sun-based activities (e.g., bikinis, bathing suits, racing-style swimwear, board shorts)
10	Bed linens	Bed sheets, pillowcases, duvet/blanket covers
11	Kitchen textiles	Tablecloths, kitchen tea towels, napkins, aprons
12	Towels and bathrobes	Towels and bathrobes
13	Textile cleaning products	Floor-cloths, dish-cloths, dusters and similar cleaning cloths

14	Reusable absorbent hygiene product	Menstrual pads and diapers			
Do yo	ou agree that the scope incoparel? Yes	luct categories as reported in the PEFCR of apparel cludes all nine apparel product categories as defined in the PEFCR project			
Pleas	se justify your answer				
500	character(s) maximum				
techn the P	nical features very similar to PEFCR project on apparel.				
	Bed linens: bed sheets, pillowcases, duvet/blanket coverKitchen textiles: tablecloths, kitchen tea towels, napkins, aprons				
	vels and bathrobes: towels				
- Tex	tile cleaning products: floo	r-cloths, dishcloths, dusters and similar cleaning cloths			
alrea	J	sted home/interior textile categories have similar technical features to those parel product categories as defined in the PEFCR project on apparel?			
Pleas	se justify your answer				
	character(s) maximum				
The s This of 1392	category corresponds to the 1270.	ry bed linens, such as bed sheets, pillowcases, and duvet/blanket cover. ne following PRODCOM codes: 13921230, 13921253, 13921255, 13921259, n of this product category in the scope?			
6	No opinion				

r lease justify your answer
500 character(s) maximum
4.4. Kitchen textiles
The scope includes kitchen textiles, such as tablecloths, kitchen tea towels, napkins, aprons.
This category corresponds to the following PRODCOM codes: 13921330, 13921353, 13921355, 13921359,
13921370, 13921430*, 13921450*, 13921470*.
Please note that when reported with *, the quantity corresponding to this PRODCOM code was assigned to two or more product categories.
Do you agree with the inclusion of this product category in the scope?
O Yes
O No
No opinion
Please justify your answer
500 character(s) maximum
4.5. Towels and bathrobes
The scope includes towels and bathrobes.
This category corresponds to the following PRODCOM codes: 13921430*, 13921450*, 13921470*.
Please note that when reported with *, the quantity corresponding to this PRODCOM code was assigned to two or more product categories.
Do you agree with the inclusion of this product category in the scope?
Yes
© No
No opinion
Please justify your answer
500 character(s) maximum

* 4.6. Textile cleaning products

The scope includes textile cleaning products, such as floor-cloths, dish-cloths, dusters and similar cleaning cloths

This category corresponds to the following PRODCOM codes: 13922953, 13922957, 13922990**, 13922998**, 13922999**.

Do you agree with the inclusion of this product category in the scope?	
O Yes	
O No	
No opinion	
Please justify your answer	
500 character(s) maximum	
4.7. Inclusion of reusable absorbent hygiene products –technical featur Reusable absorbent hygiene products, such as menstrual pads and diapers,	
Do you agree that reusable absorbent hygiene products have similar technical	al features to those already
included in the nine apparel product categories as defined in the PEFCR proj	ect on apparel?
O Yes	
O No	
No opinion	
Please justify your answer	
500 character(s) maximum	
4.8. Reusable absorbent hygiene products	
The scope includes reusable absorbent hygiene products, such as menstrual	nads and dianers
This category corresponds to the following PRODCOM codes: 13922993, 13	-
Do you agree with the inclusion of this product category in the scope?	
Yes	
O No	
No opinion	
Please justify your answer	
500 character(s) maximum	

Please, note that when reported with **, besides textile cleaning products, this PRODCOM code includes life jackets, life belts and other made up articles. The quantity corresponding to this PRODCOM code was decreased by 20% to exclude life jackets, life belts and other

made-up articles. The quantity decreased was the result of an assumption.

* 4.9. Technical textiles excluded from the scope

specific requirements: lightness, resistance, reinforcement, filtration, fire-retardancy, conductivity, insulation, flexibility, absorption and so on. Their definition does not depend on the raw material, the fibre or the technology used, but on the end-use of the product itself. This makes technical textiles very different to the textile products included in the scope. Do you agree with the exclusion of technical textiles from the scope? Yes O No No opinion Please justify your answer 500 character(s) maximum * 4.10. Sportswear Sportswear has features that are typical of technical textiles. Sportswear should be distinguished from leisure apparel and therefore should not be included in the scope. Do you agree with the statement above? Yes O No No opinion Please justify your answer 500 character(s) maximum 4.11. Distinction between leisure apparel and technical sportswear The distinction between leisure apparel and sportswear is not an easy task. Which methodology would you use to distinguish leisure apparel from sportswear? Please provide your suggestions in the box below or send documents to JRC-B5-TEXTILES@ec.europa.eu 500 character(s) maximum Section including questions on market analysis This section contains 19 questions * 5.0 Contribution to Section " 5. Market analysis" Do you want to contribute to Section "5. Market analysis"? Yes O No

The scope does not include technical textiles because they bring a functional answer to a wide range of

5. Market Analysis

5.1. Public procurement of textile products in EU

We would like to quantify/estimate the amount of textile products (in mass and/or value) that EU Member States' public authorities purchased in recent years, excluding the years affected by the pandemic. We are not interested in data during the pandemic because the purchases during those years did not follow the usual patterns.

Do you have suggestions as to how these figures can best be quantified/estimated?
O Yes
O No
No opinion
I do but I prefer not to share
Please justify your answer
500 character(s) maximum
5.1.1. References and information about Public Procurement of textile products in EU
In 5.1., you declared that you know how to quantify/estimate the amount of textile products (in mass and/or
value) that EU public authorities purchased in recent years, excluding the pandemic.
Please provide your suggestions and references to specific studies in the box below.
You can also report studies that focus only on the scale of a single Member State.
You can also send documents and information to JRC-B5-TEXTILES@ec.europa.eu
500 character(s) maximum
5.2. Classification systems of textile products
PRODCOM offers a classification of textile products placed on the EU market.
Can you provide alternative classification systems or parameters used by industry to differentiate textile
products in terms of functional, technical and quality characteristics?
Yes
© No
No opinion
I can, but I prefer not to share
Please justify your answer. If necessary, provide references to documents or information in the box below,
or send documents to JRC-B5-TEXTILES@ec.europa.eu
500 character(s) maximum

 5.3. Voluntary certification and ecolabelling The textile market in the EU offers numerous labels. Would you be able to estimate which are the most commonly used and the reasons why? Yes No 	
No opinion	
I could but I prefer not to share	
Todala bat i profer not to share	
5.3.1. Specification of voluntary certification schemes used in Europe	
Please, select the 10 most commonly used certification schemes in Europe	
at most 10 choice(s)	
AnbefaltToxics	
■ Better Cotton Initiative	
Blue Angel - The German Ecolabel	
bluesign® standard	
Carbon Reduction Label	
Climatop	
Compostability Mark of European Bioplastics	
Coop Naturaline: Switzerland	
Cradle to Cradle Certified (CM) Products Program	
Danish Indoor Climate Label	
■ Ecocert	
eco-INSTITUT	
■ ECOLOGO	
Ekologicky setrny vyrobek/Environmentally Friendly Product	
Environmental Product Declaration	
Etichetta ambientale	
EU Ecolabel	
Fair for Life	
Fairtrade	
FairWerTung	
Global Organic Textile Standard	
Good Environmental Choice "Bra Miljoval"	
Good Shopping Guide Ethical Award	
Good Weave	
Green Crane: Ukraine	
☐ GREENGUARD	
☐ Green Shape	
☐ GUT	
■ IMO Certified	
Label Step	

National Programme of Environmental Assessment and Ecolabelling in the Slovak Republik (NPEHOV)

Max Havelaar

Naturland e. V.NATURTEXIL BestNordic Swan Ecolabel

Milieukeur: the Dutch environmental quality label

	Oeko-Tex Standard 100
	OK biobased
	ÖkoControl
	Ølabel: Norway
	Processed Chlorine Free
	SEE What You Are Buying Into
	Sinngapore Green Label Scheme (SGLS)
	Skal Eko Symbol
	SMaRT Consensus Sustainable Product Standards
	Soil Association Organic Standard
	SustentaX
	Terra Cycle
	Totally Chlorine Free
	WindMade
Pleas	e, provide the reasons of your choices
500	character(s) maximum

Chain of custody

According to ISO 22095:2020:

chain of custody refers to a process by which inputs and outputs and associated information are transferred, monitored and controlled as they move through each step in the relevant supply chain.

A chain of custody system refers to a set of measures designed to implement a chain of custody, including documentation of these measures.

The following notes must be considered:

- The purpose of a chain of custody system is to provide credibility that the given material or product has a set of specified characteristics.
- The information linked to materials or products is transferred, monitored and controlled throughout the entire supply chain or parts of it.

A chain of custody model is the approach taken to control inputs and outputs, and associated information in a particular chain of custody system.

Within the ESPR, the establishment of the Digital Product Passport will require traceability of product characteristics along the whole supply chain. Currently, there is no unified chain of custody system for products placed on the EU market.

The following questions aim to understand the importance of using a common and unified chain of custody system for products placed on the EU market.

5.4. Traceability of product characteristics

Within the ESPR framework, which of the following options would best support the traceability of product characteristics along the whole supply chain?

	he adoption o	t a common and	l unified cha	in of custo	ody system	based on a	a specific chain o	t custoc	dy mod	el
--	---------------	----------------	---------------	-------------	------------	------------	--------------------	----------	--------	----

- The possibility to use any chain of custody system based on a specific chain of custody model
- The possibility to use any chain of custody system based on any chain of custody model

The use of a system different from the chain of custody
None of the above
No opinion
I have an opinion but I prefer not to share
Please justify your answer
500 character(s) maximum
5.5. Chain of custody systems – time for choosing a currently available system
How long would the industry take to choose, among the currently available chain of custody systems, the
one to be used by all economic operators placing textile products on the EU market?
From 1 to 2 years
From 2 to 3 years
From 3 to 4 years
From 4 to 5 years
More than 5 years
No opinion
I have an opinion but I prefer not to share
Please justify your answer
500 character(s) maximum
5.6. Chain of custody systems – time of development of a new system
How long would the industry take to develop a chain of custody system to be used by all economic
operators placing textile products on the EU market?
From 1 to 2 years
From 2 to 3 years
From 3 to 4 years
More than 5 years
No opinion
I have an opinion but I prefer not to share
Please justify your answer
500 character(s) maximum
5.7. Chain of custody systems – most commonly used systems
Please, provide references to the most commonly used CoC systems for products placed on the EU market.

Alternatively, you can send documents to JRC-B5-TEXTILES@ec.europa.eu $\,$

500 character(s) maximum

23

5.8. Certification of recycled content
Textile products placed on the EU market can contain recycled fibres coming from textile waste. This
recycled content can be certified by Recycled Claim Standard and Global Recycled Standard.
Are there more standards or certification systems that can be used to certify the recycled content of a
textile product placed on the EU market?
O Yes
O No
No opinion
I have an opinion but I prefer not to share
Please justify your answer and, if necessary, specify the names and references of other certification
systems and standards available.
500 character(s) maximum
5.9. Classification of textile waste according to its production stage
"Post-industrial textile waste" is generated during the manufacturing of the textile products and their
precursors.
"Pre-consumer textile waste" is generated at the retail stage (e.g. unsold textiles).
"Post-consumer textile waste" is textile products, which were disposed of after consumption and used by
citizens or end-users of commercial and industrial activities (e.g. hotel, care, automotive), commonly
referred to as household and commercial post-consumer textile waste, respectively.
5.10 Certification of recycled content – distinction between sources
Can currently available certification schemes (e.g. Recycled Claim Standard and Global Recycled
Standard) distinguish recycled textile fibres coming from post-industrial, pre-consumer, and post-consumer
textile waste?
Yes
© No
No opinion
I have an opinion but I prefer not to share
Please justify your answer and, if necessary, specify the names and references of certification schemes
capable of this distinction
500 character(s) maximum

5.11. Production of recycled fibres from textile waste

Currently, can the producer of recycled textile fibres provide their customers with recycled textile fibres coming only from one source of textile waste?

A source of textile waste means only one of the following: post-industrial, pre-consumer and post-consumer
textile waste.
O Yes
O No
No opinion
I have an opinion but I prefer not to share
Please indicate how it is possible.
500 character(s) maximum
Please, indicate why it is not possible to distinguish between the three textile waste sources (post-
industrial, pre-consumer, and post-consumer).
500 character(s) maximum
5.12. Recycled fibres from post-industrial textile waste
In general, when manufacturing yarns, what is the quantity of recycled fibres coming from post-industrial
textile waste?
Please select a percentage range of the total fibres used.
© 0%
© 0-2%
© 2-5%
© 5-10%
O 10-20%
© 20-30%
© 30-50%
Other
No opinion
I have an opinion but I prefer not to share
Please justify your choice
500 character(s) maximum
500 Character(s) maximum
5.13. Recycled fibres from pre-consumer textile waste
In general, when manufacturing yarns, what is the quantity of recycled fibres coming from pre-consumer
textile?
Please select a percentage range of the total fibres used.
0%
0-2%
© 2-5%
© 5-10%

10-20%
© 20-30%
© 30-50%
Other
No opinion
I have an opinion but I prefer not to share
Please justify your choice.
500 character(s) maximum
5.14 Recycled fibres from post-consumer textile waste
In general, when manufacturing yarns, what is the quantity of recycled fibres coming from post-consumer
textile waste?
Please select a percentage range of the total fibres used.
© 0%
© 0-2%
© 2-5%
© 5-10%
© 10-20%
© 20-30%
© 30-50%
Other
No opinion
I have an opinion but I prefer not to share
Please justify your choice.
500 character(s) maximum
5.15. Change of supply chain
Do you think that the actors across the supply chain are increasingly integrating environmental
sustainability in their activities (e.g. during resource extraction, manufacturing, logistics and procurement)?
© Yes
O No
I have an opinion but I prefer not to share
Please justify your answer
500 character(s) maximum

5.16. Actions towards a more sustainable supply chain

Which are the most common actions to change the supply chain towards more sustainable sources with
less environmental impact?
Offshoring
Reshoring
Nearshoring Nearshoring
Changes of suppliers – selection of closer suppliers, selection of suppliers with specific certifications or
ecolabels, etc.
Replacement of traditional raw materials with materials with lower environmental impact (for example, natura dyes, less harmful chemicals, raw materials with green certificates, etc.)
Changes in the distribution channels to reduce carbon emissions or selection of energy-efficient
transportation modes (for example e-commerce platforms, circular distribution channels, logistics with lower
environmental impact logistics, etc.)
Environmentally friendly production processes (less water or energy consumption, reduction of chemical use energy control devices, etc.)
Others
Please justify your answer
500 character(s) maximum
5.17. Challenges when changing towards a more sustainable supply chain
Which are the main challenges faced when changing towards a more sustainable supply chain?
Availability and maturity of novel technologies to ensure environmentally friendly production processes.
Implementation costs
Lower consumer demand for eco-friendly products or fluctuating market demand
Mandatory compliance with public legislation
Raw materials availability and quality
Others
Please justify your answer
500 character(s) maximum
5.18. Drivers for changing towards a more sustainable supply chain
Which are the main drivers for changing towards a more sustainable supply chain?
Availability and maturity of novel technologies to ensure environmentally friendly production processes
Cost reduction due to the productivity increase when implementing technologies with lower environmental
impact technologies
Consumer demand for eco-friendly products
Mandatory compliance with public legislation
Raw materials availability
Proximity of suppliers
Others

Please justify your answer

500 character(s) maximum
5.19. Reparable and modular textile products
Please, provide documents containing market data related to reparable and modular textiles products.
You can provide references of the documents in the box below, or send an email to JRC-B5-
TEXTILES@ec.europa.eu
500 character(s) maximum
Section including questions on user behaviour
This section contains 12 questions.
6.0. Contribution to section "6. User behaviour".
Do you want to contribute to section " 6. User behaviour'?
Yes
© No
6. User Behaviour

This section is not a user survey but a collection of data/background info on user behaviour studies

6.1 Time in service

Could you provide references to specific studies containing information on the average total number of times a textile product is used by a first user?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
2			
3			
4			
5			

6.2. Washing methods

Washing of textiles is assumed to be done in one of three ways: machine washing, hand washing, or dry cleaning.

Could you indicate studies or surveys in which the proportion of each washing method is stated for any of the textiles included in the scope?

If you would like to provide files, please, send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
2			
3			
4			
5			

6.3. Washing temperature

Could you indicate studies or surveys that specify the most commonly used wash temperature set by consumers to wash textiles in the washing machine?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
2			
3			
4			
5			

6.4. Care labels

Could you indicate studies or surveys that indicate how often consumers follow care labels and the reasons for doing or not doing so?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
2			
3			
4			
5			

6.5. Number of uses before washing

Could you indicate studies or surveys in which the number of times a garment is worn before washing by consumers is stated, e.g. after every 'number of wears'?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
2			
3			
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5			

6.6. Emotional durability

Could you indicate studies or surveys related to the emotional durability, which is defined as product's ability to stay relevant and desirable to the consumer?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
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6.7. Promotion of longer emotional durability

Could you indicate studies or surveys that highlight the existence of products/services that encourage consumers to keep clothes for longer and the reasons for it, e.g. a selection of apps, labels, tools, laundry aids?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
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6.8. Getting rid of a textile product

Could you indicate studies or surveys in which the reasons that normally lead consumers to get rid of (e.g. discarding as waste, donating) a textile are mentioned, e.g. poor fit/ out of style/ worn out/ forgotten about/ death?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
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6.9. Repair

Could you indicate studies or surveys that reference how often and/or in which cases consumers repair items and the reasons for doing or not doing so, e.g. at home/at a repair shop/at a taylor?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
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6.10. Priorities in purchases

Could you indicate studies or surveys that highlight what consumers look for when buying clothes/home textiles the most and/or what are their main priorities and the reasons for this, e.g. price, style/reputational value, functionality, durability, recycled content, organic cotton content?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
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6.11. Return of textile products - on-line and conventional store

We would like to learn about the main reasons to return textiles (online and at a store level). Could you please provide references that collect/assess common textile faults when they are returned, e.g. poor fit, faulty item, colour does not match expectations?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
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6.12. On-line orders

We would like to understand in which ways consumer behaviour differs when ordering textiles through online platforms compared to in store shopping. If possible, we would like to pinpoint what may be the impacts associated with the different consumption patterns.

Could you please provide any source of information on order patterns and/or returns of textiles from customers whether just online and/or in physical stores,e.g. X number of customers order X number of sizes of the same garment and return X number of them every year?

If you would like to provide files, please send them to the following functional mailbox: JRC-B5-

	Title of the article/report/survey	Author (s), Year of publication, Digital Object Identifier (DOI)	Link to the webpage
1			
2			
3			
4			
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Section including questions on ecodesign aspects

This section contains 14 questions.

* 7.0. Contribution to section "7. Ecodesign aspects".

Do you want to contribute to section "7. Ecodesign aspects"?

- Yes
- O No

7. Ecodesign aspects

Definitions from ESPR on Ecodesign aspects

- Show
- Hide

Article 5(1) of the ESPR proposal states:

"The Commission shall, as appropriate to the relevant product groups and with due consideration for all stages of their life cycle, establish ecodesign requirements to improve the following product aspects: (a) durability, (b) reliability, (c) reusability, (d) upgradability, (e) reparability, (f) possibility of maintenance and refurbishment, (g) presence of substances of concern, (h) energy use or energy efficiency, (i) resource use or resource efficiency, (j)

recycled content, (k) possibility of remanufacturing and recycling, (l) possibility of recovery of materials, (m) environmental impacts, including carbon and environmental footprint, (n) expected generation of waste materials".

Article 5(5) of the ESPR proposal states:

"Ecodesign requirements shall meet the following criteria:

- (a) there shall be no significant negative impact on the functionality of the product, from the perspective of the user;
- (b) there shall be no adverse effect on the health and safety of persons;
- (c) there shall be no significant negative impact on consumers in terms of the affordability of relevant products, also taking into account access to second-hand products, durability and the life cycle cost of products;
- (d) there shall be no disproportionate negative impact on the competitiveness of economic actors, at least of SMEs:
- (e) there shall be no proprietary technology imposed on manufacturers or other economic actors;
- (f) there shall be no disproportionate administrative burden on manufacturers or other economic actors."

According to the ESPR proposal, the following definitions apply:

Art. 2(7): 'ecodesign requirement' means a performance requirement or an information requirement aimed at making a product more environmentally sustainable;

Art. 2(8): 'performance requirement' means a quantitative or non-quantitative requirement for or in relation to a product to achieve a certain performance level in relation to a product parameter referred to in Annex I to ESPR proposal;

Art. 2(9): 'information requirement' means an obligation for a product to be accompanied by information as specified in Article 7(2) to ESPR proposal;

7.1. Improving durability and reliability

Article 2(21) of the ESPR proposal defines 'durability' as the ability of a product to function as required, under specified conditions of use, maintenance and repair, until a limiting event prevents its functioning. This definition fully refers to functional durability.

Article 2(22) of the ESPR proposal defines 'reliability' as the probability that a product functions as required under given conditions for a given duration without a limiting event.

Do you think that requirements should be set to improve durability and reliability of textile products? Please, consider a potential implementation of the requirements no later than 4 years from now.

0	Yes, information requirements
	Yes, performance requirements
	Yes, information and performance requirements
	No
	No opinion

7.2. Ease of repair and maintenance

Article 2(20) of the ESPR proposal defines 'repair' as returning a defective product or waste to a condition where it fulfils its intended use.

Annex I to the ESPR reports in point (b): "ease of repair and maintenance as expressed through: characteristics, availability and delivery time of spare parts, modularity, compatibility with commonly available spare parts, availability of repair and maintenance instructions, number of materials and components used, use of standard components, use of component and material coding standards for the identification of components and materials, number and complexity of processes and tools needed, ease of non-destructive disassembly and re-assembly, conditions for access to product data, conditions for access to or use of hardware and software needed".

Article 2(19) of the ESPR proposal defines 'maintenance' as an action carried out to keep a product in a condition where it is able to function as required.

Do you think that requirements should be set to ease repair and maintenance? Please, consider a potential implementation of the requirements no later than 4 years from now.

	Yes, information requirements
	Yes, performance requirements
	Yes, information and performance requirements
	No
	No opinion

7.3. Ease of recycling of materials

Article 3(17) of the Waste Framework Directive defines 'recycling' as any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.

Do you think that requirements should be set to ease recycling of materials?

Please, consider a potential implementation of the requirements no later than 4 years from now.

\bigcirc	Yes.	information	requirements
	. 00,	miomiation	10quil official

- Yes, performance requirements
- Yes, information and performance requirements
- O No
- No opinion

7.4. Ease of refurbishment, remanufacturing and upgradability

Article 2(18) of the ESPR proposal defines 'refurbishment' as preparing or modifying an object that is waste or a product to restore its performance or functionality within the intended use, range of performance and maintenance originally conceived at the design stage, or to meet applicable technical standards or regulatory requirements, with the result of making a fully functional product.

Article 2(16) of the ESPR proposal defines 'remanufacturing' as an industrial process in which a product is produced from objects that are waste, products or components and in which at least one change is made to the product that affects the safety, performance, purpose or type of the product typically placed on the market with a commercial guarantee.

Article 2(17) of the ESPR proposal defines 'upgrading' as enhancing the functionality, performance, capacity or aesthetics of a product.

Do you think that requirements should be set to ease refurbishment, remanufacturing and upgradability of textile products?

Please, consider a potential implementation of the requirements no later than 4 years from now.

- Yes, information requirements
- Yes, performance requirements
- Yes, information and performance requirements
- O No
- No opinion

7.5. Resource use or resource efficiency

Do you think that requirements should be set on resource use or resource efficiency? Please consider a potential implementation of the requirements no later than 4 years from now.

- Yes, information requirements
- Yes, performance requirements
- Yes, information and performance requirements
- O No
- No opinion

7.6. Use or content of recycled materials

Article 3(17) of the Waste Framework Directive defines 'recycling' as any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other

purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.

Do you think that requirements should be set on use or content of recycled materials? Please, consider a potential implementation of the requirements no later than 4 years from now. Yes, information requirements Yes, performance requirements Yes, information and performance requirementsNo opinion O No No opinion 7.7. Presence of substances of concern Do you think that requirements should be set about presence of substances of concern that negatively affect the re-use and recycling of textiles? Please, consider a potential implementation of the requirements no later than 4 years from now. Yes, information requirements Yes, performance requirements Yes, information and performance requirements O No No opinion 7.8. Energy use or energy efficiency Do you think that requirements should be set about energy use or energy efficiency? Please, consider a potential implementation of the requirements no later than 4 years from now. Yes, information requirements Yes, performance requirements Yes, information and performance requirements O No No opinion 7.9. Environmental impacts Article 2(14) of the ESPR proposal defines 'environmental impact' as any change to the environment, whether adverse or beneficial, wholly or partially resulting from a product during its life cycle. Do you think that requirements should be set on environmental impacts? Please, consider a potential implementation of the requirements no later than 4 years from now. Yes, information requirements Yes, performance requirements Yes, information and performance requirements

7.10. Microplastics pollution

O No

No opinion

Microplastics are plastic particles smaller than 5 mm, including nanosized plastics <1 μ m. Due to their small size, the emission of microplastics into the environment is addressed as pollution that has adverse effects on the biosphere.

Please, consider a potential implementation of the requirements no later than 4 years from now.
Yes, information requirements
Yes, performance requirements
Yes, information and performance requirements
O No
No opinion
7.11. Expected generation of waste materials
Article 3(1) of the Waste Framework Directive defines 'waste' as any substance or object which the holder
discards or intends or is required to discard.
"Post-industrial textile waste" is generated during the manufacturing of the textile products and their
precursors.
"Pre-consumer textile waste" is generated at retail stages (e.g. unsold textiles).
"Post-consumer textile waste" is textile products, which were disposed after consumption and use by
citizens or end-users of commercial and industrial activities (e.g. hotel, care, automotive), commonly
referred to household and commercial post-consumer textile waste, respectively.
Do you think that requirements should be set about expected generation of waste materials?
Please consider a potential implementation of the requirements no later than 4 years from now.
Yes, information requirements
Yes, performance requirements
Yes, information and performance requirements
O No
No opinion
7.12. Priority among Ecodesign aspects
Please rank the ecodesign aspects that would:
 most effectively decrease the environmental impacts of textile products,
 be possible to implement without disproportionate costs for customers and society.
Please consider a potential implementation of the requirements no later than 4 years from now.
Please rank the ecodesign aspects from the most to the least important.
Use drag&drop or the up/down buttons to change the order or <u>accept the initial order</u> .
Improving durability and reliability
Ease of repair and maintenance
Ease of recycling of materials

iii

iii

Ease of refurbishment, remanufacturing and upgradability

Resource use or resource efficiency

Do you think that requirements should be set on microplastics pollution at product level?

iii	Use or content of recycled materials
iii iii	Presence of substances of concern
#	Energy use or energy efficiency
#	Environmental impacts
#	Microplastics pollution
#	Expected generation of waste
#	Other

Please justify your ranking and include: (A) requirements you would set, (B) elements supporting the development of requirements you would set, and (C) elements challenging the development of requirements you would set.

2000 character(s) maximum

7.13. Post-industrial textile waste

"Post-industrial textile waste" is generated during the manufacturing of the textile products and their precursors.

Within the ESPR framework, which measure(s) would you set to decrease the generation of post-industrial textile waste?

If available, please provide references to specific studies, or send an email to JRC-B5-TEXTILES@ec. europa.eu

500 character(s) maximum

7.14. Research and development on Ecodesign aspects

The textile industry is investing resources to decrease the environmental impact of the textile products placed on the EU market. In this context, many research and development projects are under development. Please, rank the ecodesign aspects from the most to the least investigated.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

#	Ease of refurbishment, remanufacturing and upgradability
#	Resource use or resource efficiency
#	Use or content of recycled materials
#	Presence of substances of concern
#	Energy use or energy efficiency

	#	Improving durability and reliability	
	#	Ease of repair and maintenance	
	#	Ease of recycling of materials	
	#	Environmental impacts	
	#	Microplastics pollution	
	#	Expected generation of waste	
	#	Others	
	-	ustify your ranking aracter(s) maximum	
Se	ectio	n including questions on EU Ecolabel	
	This section contains 72 questions. It follows the standardised framework of questionnaires within the revision of EU ecolabel criteria		
	8.0. Contribution to Section "8. EU Ecolabel". Do you want to contribute to Section "8. EU Ecolabel"? Yes No		
8.	EU	Ecolabel	
		sion Decision 2014/350/EU establishes the ecological criteria for the award of the EU Ecolabel for oducts.	
In 2	2.2.7., y did	you declared to be an EU Ecolabel licence holder. your company apply for the EU Ecolabel in this product group? ecause there is a growing demand for EU Ecolabel products o increase visibility o increase sales ther	

8.1.1. Reasons to apply for EU Ecolabel

Please specify

500 character(s) maximum

8.2. EU Ecolabel process
In 2.2.7., you declared to be an EU Ecolabel licence holder.
What are the biggest costs linked to getting EU Ecolabel certification, e.g. monetary expenses, testing
requirements, contact supply chain, other resources?
500 character(s) maximum
0.2. Facilehalling gyafayana
8.3. Ecolabelling preference
You declared to be a "Holder of ISO Type I ecolabel licence, e.g. Blue Angel, Nordic Swan Ecolabel".
Please indicate which one(s):
Plus Angel The Common Feelahel
☐ Blue Angel – The German Ecolabel ☐ Nordic Swan Ecolabel
Other
If "Other", please specify
50 character(s) maximum
8.3.1 Ecolabelling preference
You declared to be a licence holder of an ecolabel different from EU Ecolabel.
Why did your company prefer another labelling scheme rather than the EU Ecolabel?
500 character(s) maximum

8.4. Awarded licences and products for categories included in the scope reported in Section 3

In 2.2.1., you declared to be an EU Ecolabel Competent Body.

Please report in the table below the number of awarded licences and products for each product category included in the scope reported in Section 3.

Category	Number of awarded licences	Number of awarded products
Textile clothing and accessories		
Interior textiles		
Textile fibre, yarn, fabric and knitted panel		
Non-fibre element		
Textile cleaning product		

8.5. Awarded licences and products for categories NOT included in the scope reported in Section 3

In 2.2.1., you declared to be a Competent Body.

Please report in the table below the number of awarded licences and products for each sub-texiles product category NOT included in the scope reported in Section 3.

	Product category NOT included in Section 3	Description of awared products	Number of awared licences	Number of awared products
•				
•				
•				

In 2.2.1., you declared to be a Competent Body.
Have you ever been contacted by producers or others who have had difficulty in understanding the criteria
scope or how to interpret any criterion?
Please specify the case(s).
500 character(s) maximum
0.7 Dejection of an application
8.7. Rejection of an application
In 2.2.1., you declared to be a Competent Body.
Have you ever refused to grant an application because any criterion was not fulfilled?
O Yes
O No
8.7.1. Rejection of an application – reasons
Please indicate which criteria and which particular problem the company faced.
500 character(s) maximum
300 Character(S) maximum
8.8. Stimulating number of licences
In 2.2.1., you declared to be a Competent Body.
What do you think would increase the number of licences within this product group?
Please specify any action you would recommend.
500 character(s) maximum
8.9. General changes
Overall, what would you change about the EU Ecolabel criteria for this product group?
between 1 and 4 choices
I would decrease the number of criteria
I would decrease the multiper of chieffa I would decrease the ambition of some requirements
 I would simplify the complexity in the wording of certain criteria, as they are difficult to understand
Other
Nothing No opinion
No opinion
Please specify
500 character(s) maximum
ou onarconor maximum

8.10. Application costs and annual fee

8.6. Difficulty in comprehension

Are the application costs and annual fee too high?

O Yes
O No
No opinion
If yes, please specify in which country you think application costs and annual fee are too high
500 character(s) maximum
8.11. EU Ecolabel perception
Do you think that consumers look for EU ecolabelled products when buying products within this product
group?
O Yes
O No
No opinion
8.12. Grouping of EU Ecolabel criteria
EU Ecolabel criteria are grouped as follows: textile fibres, components and accessories, chemicals and
processes, fitness for use, Corporate Social Responsibility, supporting information.
Do you agree with this approach?
Yes
No
No opinion
Please specify
500 character(s) maximum
8.13.Assessment and verification
Original text of the assessment and verification
Show
Hide
- Tilde

In order to show compliance with the criteria the applicant is required to declare the following information about the product(s) and their supply chain:

Table 1: Overview of assessment and verification requirements

Criteria set	Verification source
(a) Textile fibre criteria: The complete material composition of the product(s), identifying and showing compliance for textile fibres, components and accessories;	Fibre and component manufacturers, their raw material and chemical suppliers and testing laboratories working in accordance with the specified test methods.
(b) Chemicals and processes: The substances,	Production sites, their chemical suppliers and

production recipes and technologies used to manufacture and impart specific qualities and functions to the product at the spinning, pre- treatment, dyeing, printing and finishing stages and to treat air and wastewater emissions;	testing laboratories working in accordance with the specified test methods. Where required product analytical testing shall be carried out annually during the license period and submitted to the appropriate competent body for verification.	
(c) Fitness for use: The performance of the product(s) as defined by specific testing procedures which address colour fastness under specific conditions, resistance to pilling and abrasion, and the durability of repellency, easycare and flame retardancy functions;	Testing laboratories working in accordance with specified test methods.	
(d) Corporate Social Responsibility: Compliance of the applicants' selected cut/make/trim suppliers with the defined ILO standards.	Independent verifiers or documentary evidence based on the auditing of cut/make/trim production sites.	

Each criteria contains detailed verification requirements which require the applicant to compile declarations, documentation, analyses, test reports and other evidence relating to the product(s) and their supply chain.

The validity of the license is based on verification upon application and, where specified under criterion 13, product testing which shall be submitted to competent bodies for verification. Changes in suppliers and production sites pertaining to licensed products shall be notified to competent bodies, together with supporting information to verify ongoing compliance with the license conditions.

Competent bodies shall preferentially recognise tests by laboratories which are accredited according to ISO 17025 and verifications performed by bodies which are accredited under the EN 45011 standard or an equivalent international standard.

The functional unit, to which inputs and outputs should be related, is 1 kg of textile product at normal conditions (65 % RH \pm 4 % and 20 °C \pm 2 °C; these norm conditions are specified in ISO 139 Textiles — standard atmospheres for conditioning and testing).

Where the applicant uses a certification system to provide independent verifications the chosen system and associated systems for accreditation of verifiers shall meet the general requirements of EN 45011 and ISO 17065. Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications and site visits.

The competent bodies are recommended to take into account the implementation of recognised environmental management schemes, such as EMAS, ISO 14001 and ISO 50001, when assessing applications and monitoring compliance with the criteria (note: it is not required to implement such management schemes).

			and the second	200			1/- 1 10
DO	you think that the	assessment a	ind the	verification	need to be	revised and	d/or changed?

- Yes
- No, the criterion is adequate and does not need to be changed
- No opinion

500 character(s) maximum
8.14. Introduction to textile fibre criteria Original text of the textile fibre criteria
Show Hide
Fibre-specific criteria are set out in this section for the following fibre types: (a) Natural fibres: Cotton and other natural cellulosic seed fibres, flax and other bast fibres, wool and othe keratin fibres;
(b) Synthetic fibres: Acrylic, elastane, polyamide, polyester and polypropylene;(c) Man-made cellulose fibres: lyocell, modal and viscose.
Any fibre, including the above listed ones, may be used without having to meet the textile fibre criteria if it contributes to less than 5 % of the total weight of the product or if it constitutes a padding or lining. With the exception of polyamide and polyester the textile fibre criteria do not have to be met in the following cases: (i) By the whole product if the fibres contain recycled content that in total amounts to at least 70 % by weight of all the fibres in the product;
(ii) By individual fibres forming part of the ecolabelled product where the fibre type contains at least 70 % weight of recycled content.
For the purposes of calculating the percentage of cotton in a product that shall be required to comply with criterion 1(a) or 1(b), the recycled cotton fibre content shall be deducted from the required minimum percentages except in the case of clothing for babies under 3 years old.
In this context, fibres that contain a recycled content are defined as fibres originating from pre-consumer waste (including polymer and fibre production waste, cuttings from textile and clothing manufacturers) and post-consumer waste (textile and all kind of fibre and textile products, as well as non-textile waste including PET drinking bottles and fishing nets).
Recycled content shall, with the exception of PET bottles used to manufacture polyester, meet the requirements of the criterion 13 RSL. This shall include annual, randomised analytical testing for specified substance groups.
Assessment and verification for recycled content: recycled content shall be traceable back to the reprocessing of the feedstock. This shall be verified by independent third party certification of the chain of custody or by documentation provided by feedstock suppliers and reprocessors. Where required by criterion 13 declarations and laboratory testing results shall be provided by fibre manufacturers and feedstock suppliers.
Do you think that the introduction to the textile fibre criteria should be changed?

Please indicate how the assessment and verification could be changed.

No, the criterion is adequate and does not need to be changed

Yes

No opinion

Minor changes should be incorporatedOther
Please indicate how the introduction to the textile fibre criteria could be changed. 500 character(s) maximum
8.15. Criterion 1. Cotton and other natural cellulosic seed fibres (including kapok) Original text Criterion 1 Show Hide
Cotton and other natural cellulosic seed fibres (hereinafter referred to as cotton) shall contain a minimum content of either organic cotton (see criterion 1a) or integrated pest management (IPM) cotton (see criterion 1b). In addition to this:
 All conventional cotton and IPM cotton used shall comply with the pesticide restrictions in criterion 1c, Only in case an organic cotton claim is made under criterion 28, for the production standard 1(a), all conventional cotton and IPM cotton that is blended with organic cotton shall come from non-genetically modified varieties,
— For the purposes of calculating the percentage of cotton in a product that shall be required to comply with criterion 1(b), any organic cotton fibre content shall be deducted from the required minimum percentage,
 All organic and IPM cotton shall be fully traceable in accordance with criterion 1(d), with verification accepted based on the annual volume of cotton purchased or the content of the final product, Clothing for babies of less than 3 years old shall contain a minimum of 95 % organic cotton.
Products meeting specific content thresholds for organic or IPM cotton shall be permitted to display additional text alongside the Ecolabel communicating the content claim. Guidance is provided in criterion 28.
Do you think that Criterion 1 should be changed?
No, the criterion is adequate and does not need to be changedYes
 No opinion Minor changes should be incorporated
Other
Please indicate how criterion 1 could be changed.
500 character(s) maximum
8.16. Criterion 1(a).Organic production standard Original text of Criterion 1(a)
Show

Hide

ShowHide

With the exception of the products listed below a minimum of 10 % of the cotton shall be grown according to the requirements laid down in Council Regulation (EC) No 834/2007 (2), the US National Organic Programme (NOP) or equivalent legal obligations set by trade partners of the EU. The organic cotton content may include organically grown cotton and transitional organic cotton.

The cotton content of the following products shall contain a minimum of 95 % organic cotton: T-shirts, woman's tops, casual shirts, jeans, pyjamas and nightwear, underwear and socks.

Assessment and verification: Organic content should be certified by an independent control body to have been produced in conformity with the production and inspection requirements laid down in Regulation (EC) No 834/2007 the US National Organic Programme (NOP) or those set by other trade partners. Verification shall be provided on an annual basis for each country of origin.

For conventional and IPM cotton that is blended with organic cotton, a qualitative screening test for common genetic modifications carried out according to EU Reference Methods for GMO analysis (3) and indicating a GMO-free result shall be accepted as a proof of compliance. Tests shall be made on samples of raw cotton from each country of origin and before it passes through any wet treatment. Certification of IPM cotton by schemes that exclude genetically modified cotton shall be accepted as proof of compliance.

Do you think that Criterion 1(a) should be changed?
No, the criterion is adequate and does not need to be changed
Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 1(a) could be changed.
500 character(s) maximum
8.17. Criterion 1(b). Cotton production according to IPM principles
Original text of Criterion 1(b)

A minimum of 20 % of the cotton shall be grown according to IPM principles as defined by the UN Food and Agricultural Organisation (FAO) IPM programme, or Integrated Crop Management (ICM) systems incorporating IPM principles, and shall comply with the pesticide restrictions in criterion 1(c).

For the following products the minimum percentage of the cotton that shall be grown according to IPM principles as defined above shall be 60 %: T-shirts, woman's tops, casual shirts, jeans, pyjamas and nightwear, underwear and socks.

Assessment and verification: The applicant shall provide evidence that the cotton has been grown by farmers that have participated in formal training programmes of the UN FAO or Government IPM and ICM programmes and/or that have been audited as part of third party certified IPM schemes. Verification shall either be provided on an annual basis for each country of origin or on the basis of certifications for all IPM cotton purchased to manufacture the product.

Compliance with the pesticide restriction shall not be required for schemes that prohibit use of the substances listed in criterion 1(c) and where either testing is carried out or declarations of non-use are obtained from farmers and/or farmer producer groups that are verified by site visits carried out by control bodies accredited by either national governments or recognised organic or IPM certification schemes.

Do you think that Criterion 1(b) should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 1(b) could be changed. 500 character(s) maximum
8.18. Criterion 1(c). Pesticide restrictions applying to conventional and IPM cotton Original text of Criterion 1(c)

All cotton used in ecolabelled textile products, with the exception of organic cotton and cotton from IPM schemes exempted in 1(b), shall be grown without the use of any of the following substances:

Aldicarb, aldrin, campheclor (toxaphene), captafol, chlordane, 2,4,5-T, chlordimeform, cypermethrin, DDT, dieldrin, dinoseb and its salts, endosulfan, endrin, heptachlor, hexachlorobenzene, hexachlorocyclohexane (total isomers), methamidophos, methylparathion, monocrotophos, neonicotinoids (clothianidine, imidacloprid, thiametoxam), parathion, pentachlorophenol.

The sum total of the listed pesticides detected upon testing of the cotton shall not be greater than 0,5 ppm.

Assessment and verification:

ShowHide

Cotton shall be tested for the listed substances. A test report shall be provided based on the following test methods, as appropriate:

- US EPA 8081 B (organo-chlorine pesticides, with ultrasonic or Soxhlet extraction and apolar solvents (iso-octane or hexane)),
- US EPA 8151 A (chlorinated herbicides, using methanol),
- US EPA 8141 B (organophosphorus compounds),
- US EPA 8270 D (semi-volatile organic compounds).

Tests shall be made on samples of raw cotton from each country of origin and before it passes through any wet treatment. For each country of origin testing shall be carried out on the following basis:

- (i) Where only one lot of cotton is used per year a sample shall be taken from a randomly selected bale;
- (ii) If two or more lots of cotton are used per year composite samples shall be taken from 5 % of the bales.

Cotton is not required to be tested where it has been certified by an IPM scheme that prohibits the use of the listed substances.

Do you think that Criterion 1(c) should be changed?
No, the criterion is adequate and does not need to be changed
Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 1(c) could be changed.
500 character(s) maximum
oo character(s) maximum
8.19. Criterion 1(d). Traceability requirements applying to organic and IPM cotton
Original text of Criterion 1(d)
Show
O Hide
All cotton grown according to the organic and IPM production standards and used to manufacture an
Ecolabelled textile product shall be traceable from the point of verification of the production standard up
until, as a minimum, greige fabric production.
Assessment and verification:
the applicant shall demonstrate compliance with the minimum cotton content requirement either for the
annual volume of cotton purchased or for the blend of cotton used to manufacture the final product(s) and
according to each product line:
(i) On an annualised basis: Transaction records and/or invoices shall be provided that document the
quantity of cotton purchased on an annual basis from farmers or producer groups, and/or the total weight of certified cotton, up until greige fabric production;
(ii) On a final product basis: Documentation corresponding to the quantity of cotton used in each final

product shall be provided from the spinning and/or fabric production stages. All documentation shall

Do you think that Criterion 1(d) should be changed?

No, the criterion is adequate and does not need to be changed

Yes

No opinion

Minor changes should be incorporated

Other

reference the Control Body or certifier of the different forms of cotton.

500 character(s) maximum
 8.20. Criterion 2(a). Flax and other bast fibres (including hemp, jute and ramie) Original text of Criterion 2(a) Show Hide
2(a) Flax and other bast fibres shall be retted under ambient conditions and without thermal energy inputs.
Assessment and verification: the applicant shall provide a declaration of the retting method used from the farmers and/or scutching mills supplying the fibre.
Do you think that Criterion 2(a) should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
If necessary, please indicate how Criterion 2(a) could be changed. 500 character(s) maximum
8.21. Criterion 2(b). Flax and other bast fibres (including hemp, jute and ramie) Original text of Criterion 2(b) Show Hide
2(b) Where water retting has been used the wastewater from retting ponds shall be treated so as to reduce the COD or TOC by at least 75 % for hemp fibres and by at least 95 % for flax and other bast fibres.
Assessment and verification: if water retting is used, the applicant shall provide a test report showing compliance and using the following test method: ISO 6060 (COD).
Do you think that Criterion 2(b) should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incroporated Other

If necessary, please indicate how Criterion 2(b) could be changed.

5	00 charactei	r(s) maximum			

8.22. Criterion 3(a). Wool and other keratin fibres (including wool from sheep and lambs, and hair from camel, alpaca and goat)

Original text of Criterion 3(a)

- Show
- Hide

The sum totals provided in Table 2 shall not be exceeded for wool ectoparasiticide concentrations on raw wool prior to scouring.

These requirements shall not apply if documentary evidence can be presented that establishes the identity of the farmers producing at least 75 % of the wool or keratin fibres in question, together with an independent verification based on site visits that the substances listed above have not been applied to the fields or animals concerned.

Table 2: Sum total restrictions on ectoparasiticide concentrations in wool

Ectoparasiticide groups	Sum total limit value
$\gamma\text{-hexachlorocyclohexane (lindane), }\alpha\text{-hexachlorocyclohexane, }\beta\text{-hexachlorocyclohexane, }\delta\text{-hexachlorocyclohexane, aldrin, dieldrin, endrin, }p,p'\text{-DDT, }p,p'\text{-DDD}$	0,5 ppm
Cypermethrin, deltamethrin, fenvalerate, cyhalothrin, flumethrin	0.55 ppm
Diazinon, propetamphos, chlorfenvinphos, dichlofenthion, chlorpyriphos, fenchlorphos	2 ppm
Diflubenzuron, triflumuron, dicyclanil	2 ppm

Wool scourers that operate closed loop water systems without the discharge of wastewater effluent and which break down the aforementioned ectoparasiticides that may be present in scouring residues and sludge through incineration are derogated from the requirement for wool testing but must comply with at least two of the measures in 3(c).

Assessment and verification: the applicant shall either provide the documentation indicated above or compile test reports, using the following test method: IWTO draft test method 59. The test should be made on farmer or sales lots of raw wool, by country of origin (if mixed) and before any wet processing. A minimum of one composite sample of multiple farmer or sales lots from each country of origin shall be tested per processing lot. A composite sample should consist of either of the following:

- (i) wool fibres from at least 10 randomly selected farmer or sales lots (by country of origin), where there are more than 10 sales lots for that country of origin within the processing lot;
- (ii) one sample per sales lot or farmer lot (whichever is less) supplying the processing lot where there are less than 10 sales lots for that country of origin within the processing lot.

Alternatively test reports may be submitted for all farmer or sales lots in a processing lot.

Where a derogation applies then the applicant shall provide evidence confirming the scouring plant configuration and laboratory test reports demonstrating the breakdown of ectoparasiticides that may be present in scouring residues and sludge.

0	No, the criterion is adequate and does not need to be changed Yes
0	No opinon
0	Minor changes should be incorporated
	Other
	essary, please indicate how Criterion 3(a) could be changed. character(s) maximum

8.23. Criterion 3(b). Wool and other keratin fibres (including wool from sheep and lambs, and hair from camel, alpaca and goat)

Original text of Criterion 3(b)

Do you think that Criterion 3(a) should be changed?

Show

Hide

Wool scouring operations shall minimise effluent COD by maximising dirt removal and grease recovery, followed by treatment to the value specified in Table 3 either on or off site. The following COD limits shall apply to coarse and fine greasy wool scouring. Fine wool is defined as merino wool of \leq 23,5 micron in diameter.

Table 3: COD values for the final discharge of effluent from wool scouring

Type of wool	Final discharge to the environment (g COD/kg greasy wool)
Coarse wool	25 g/kg
Fine wool	45 g/kg

Assessment and verification: the applicant shall provide relevant data and test reports related to this criterion, using the following test method: ISO 6060. The data shall demonstrate compliance by the wool scouring site or, if the effluent is treated off-site, by the wastewater treatment operator. Compliance with this criterion shall be on the basis of monthly averages for the six months preceding the application.

Do yo	u think that criterion 3(b) should be changed?
	No, the criterion is adequate and does not need to be changed
	Yes
	No opinion
	Minor changes should be incorporated
	Other

If necessary, please indicate how Criterion 3(c) could be changed. 500 character(s) maximum	
8.24. Criterion 3(c). Wool and other keratin fibres (including wool from sheep and lambs, and hair from camel, alpaca and goat) Original text of Criterion 3(c) Show	
O Hide	
Wool scourers shall implement at least one of the following measures to recover value from either oxidise grease, fibre, suint or sludge arising from the scouring site used for the ecolabelled wool products: (i) recovery for sale as a chemical feedstock; (ii) the production of compost or liquid fertiliser; (iii) the manufacturing of products such as building materials;	∍d
(iv) treatment and energy recovery by anaerobic digestion or incineration. Assessment and verification: the applicant shall provide a report and waste transfer notes confirming the type and proportion of waste recovered and the method used.	
Do you think that criterion 3(c) should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other	
If necessary, please indicate how Criterion 3(c) could be changed. 500 character(s) maximum	
8.25. Criterion 4(a). Acrylic Original text of the criterion 4(a) Show Hide	
The emissions to air of acrylonitrile (during polymerisation and up to the solution ready for spinning), expressed as an annual average, shall be less than 1,0 g/kg of fibre produced.	
Assessment and verification: the applicant shall provide detailed documentation and/or test reports showing compliance with this criterion, together with a declaration of compliance from the fibre manufactors).	ure

Do you think that criterion 4(a) should be changed?

No, the criterion is adequate and does not need to be changed

Yes
No opinion
 Minor changes should be incoporated
Other
If necessary, please indicate how Criterion 4(a) could be changed.
500 character(s) maximum
8.26. Criterion 4(b). Acrylic Original text of Criterion 4(b)
Show
Hide
The workplace emissions to air of N,N-dimethylacetamide (127-19-5) during polymerisation and spinning shall not exceed an Indicative Occupational Exposure Limit Value (IOELV) of 10,0 ppm.
Assessment and verification: emissions values are to be measured at those process stages in which the substances are used, expressed as an 8-hour average value (shift mean value). The applicant shall provide test reports and monitoring data from the fibre manufacturer(s) showing compliance with this criterion.
Do you think that criterion 4(b) should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
If necessary, please indicate how Criterion 4(b) could be changed. 500 character(s) maximum
8.27. Criterion 5(a). Elastane Original text of Criterion 5(a) Show Hide
Organotin compounds shall not be used to manufacture the fibres. Assessment and verification: the applicant shall provide a declaration of non-use from the fibre manufacturer(s).
Do you think that criterion 5 (a) should be changed? No, the criterion is adequate and does not need to be changed Yes

No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 5(a) could be changed.
500 character(s) maximum
300 Character(s) maximum
8.28. Criterion 5(b). Elastane
Original text of Criterion 5(b)
Show
O Hide
The workplace emissions to air of the following substances during polymerisation and spinning shall not
exceed the following indicative occupational exposure limit values (IOELV):
(i) diphenylmethane-4,4'-diisocyanate (101-68-8) 0,005 ppm
(ii) toluene-2,4-diisocyanate (584-84-9) 0,005 ppm
(iii) N,N-dimethylacetamide (127-19-5) 10,0 ppm
Assessment and verification : emissions values are to be measured at those process stages in which the
substances are used, expressed as an 8-hour average value (shift mean value). The applicant shall provide
test reports and monitoring data from the fibre manufacturer(s) showing compliance with this criterion.
Do you think that criterion 5(b) should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
No opinion
Minor changes should be incorporated
Other
In case, please, indicate how criterion 5(b) could be changed.
500 character(s) maximum
8.29. Criterion 6. Polyamide (or nylon) - Introduction
Original text of Criterion 6
Show
O Hide

Polyamide products shall comply with at least one of the production standards listed in sub-criteria 6(a) and 6(b).

Any product that meets the minimum recycled content threshold shall be permitted to display additional text alongside the Ecolabel communicating a content claim. Guidance is provided in criterion 28.

Do you think that the introduction of criterion 6 should be changed?
No, the criterion is adequate and does not need to be changed
Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please, indicate how the introduction of Criterion 6 could be changed.
500 character(s) maximum
O CO. Oritation (Ve). Behave its (amountary)
8.30. Criterion 6(a). Polyamide (or nylon)
Original text of Criterion 6(a)
Show Hide
Hide
Production standard 1: Minimum recycled content.
Fibres shall be manufactured using a minimum content of 20 % nylon that has been recycled from pre and
/or post-consumer waste.
701 post consumer waste.
Assessment and verification: recycled content shall be traceable back to the reprocessing of the feedstock.
This shall be verified by independent certification of the chain of custody or by documentation provided by
suppliers and processors.
Do you think that criterion 6(a) should be changed?
No, the criterion is adequate and does not need to be changed
Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 6(a) could be changed.
500 character(s) maximum
8.31. Criterion 6(b). Polyamide (or nylon)
Original text of Criterion 6(b)
Show
Hide

Production standard 2: N2O emissions from monomer production.

The emissions to air of N2O from nylon monomer production, expressed as an annual average, shall not exceed 9,0 g N2O/kg of caprolactam (for nylon 6) or adipic acid (for nylon 6,6).

Assessment and verification: the applicant shall provide documentation or test reports showing compliance based on monitoring data, together with a declaration of compliance from fibre manufacturer(s) and their feedstock providers. If necessary, please indicate how Criterion 6(b) could be changed. No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other In case, please, indicate how criterion 6(b) could be changed. 500 character(s) maximum 8.32. Criterion 7. Polyester - introduction Original text of Criterion 7 Show Hide Textile products that are primarily for sale to consumers shall comply with sub-criteria (a) and (b). Textile products that are primarily for sale to commercial or public sector customers shall comply with (a) and either (b) or (c). Any product that meets the minimum recycled content threshold shall be permitted to display additional text alongside the Ecolabel communicating this content claim. Guidance is provided in criterion 28. Do you think that criterion 7 should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other In case, please, indicate how criterion 7 could be changed. 500 character(s) maximum

8.33. Criterion 7(a). Polyester

Original text of Criterion 7(a)

- Show
- Hide

The level of antimony present in the polyester fibres shall not exceed 260 ppm. Polyester fibres manufactured from recycled PET bottles are derogated from this requirement.

Assessment and verification: the applicant shall either provide a declaration of non-use or a test report using the following test methods: direct determination by Atomic Absorption Spectrometry or Inductively Coupled Plasma (ICP) Mass Spectrometry. The test shall be carried out on a composite sample of raw fibres prior to any wet processing. A declaration shall be provided for fibres manufactured from recycled PET bottles.

Do you think that criterion 7 (a) should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 7(a) could be changed.
8.34. Criterion 7(b). Polyester
Original text of Criterion 7(b)
Show
Hide
Fibres shall be manufactured using a minimum content of PET that has been recycled from pre-consumer
and/or post-consumer waste. Staple fibres shall contain a minimum content of 50 % and filament fibres 20
%. Micro-fibres are derogated from this requirement and shall instead comply with (c).
Assessment and verification: recycled content shall be traceable back to the reprocessing of the feedstock.
This shall be verified by independent certification of the chain of custody or by documentation provided by
suppliers and processors.
Do you think that Criterion 7 (b) should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 7(b) could be changed.
500 character(s) maximum
Coe Grandoter (a) maximum

Show Hide
The emissions of VOCs during the production of polyester, expressed as an annual average including both point sources and fugitive emissions, shall not exceed 1,2 g/kg for PET chips and 10,3 g/kg for filament fibre.
Assessment and verification: the applicant shall provide monitoring data and/or test reports demonstrating compliance with EN 12619 or standards with an equivalent test method. Monthly averages for the total emissions of organic compounds from production sites for ecolabelled products shall be provided for a minimum of six months preceding the application.
Do you think that Criterion 7 (c) should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
 No opinion Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 7(c) could be changed.
500 character(s) maximum
8.36. Criterion 8. Polypropylene
Original text of Criterion 8
Show
Hide
Lead based pigments shall not be used.
Assessment and verification : the applicant shall provide a declaration of non-use.
Do you think that Criterion 8 should be changed?
 No, the criterion is adequate and does not need to be changed Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 8 could be changed.
500 character(s) maximum

Original text of Criterion 7(c)

8.37 Criterion 9(a). Man-made cellulose fibres (including viscose, modal and lyocell) - Pulp production sub-
criteria
Original text of Criterion 9(a) Show
Hide
A minimum 25 % of pulp fibres shall be manufactured from wood that has been grown according to the
principles of sustainable forestry management as defined by the UN FAO. The remaining proportion of pulp
fibres shall be from pulp that is sourced from legal forestry and plantations.
Assessment and verification: the applicant shall obtain from the fibre manufacturer(s) valid, independently
certified chain of custody certificates demonstrating that the wood fibres have been grown according to
sustainable forestry management principles and/or are from legal sources. FSC, PEFC or equivalent
schemes shall be accepted as independent certification.
The fibre manufacturer shall demonstrate that due diligence processes have been followed as specified in
Regulation (EU) No 995/2010 of the European Parliament and of the Council (4) in order to ensure that
timber has been legally harvested. Valid EU FLEGT (Forest Law Enforcement, Governance and Trade) or
UN CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora)
licenses and/or third party certification shall be accepted as evidence of legal sourcing.
Do you think that Criterion 9 (a) should be changed?
No, the criterion is adequate and does not need to be changed
© Yes
No opinion
 Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 9(a) could be changed.
500 character(s) maximum
500 Character(s) maximum
9.29 Critorian O(h) Man made collulate fibres (including vicesses model and lyocall). Duly production
8.38. Criterion 9(b). Man-made cellulose fibres (including viscose, modal and lyocell) - Pulp production sub-criteria
Original text of Criterion 9(b)
Show
O Hide
Pulp produced from cotton linters shall, as a minimum, meet with the requirements of either cotton criterion 1a or 1b.
Assessment and verification: as indicated in the corresponding criteria
Accession and vermoation has indicated in the corresponding enterial
Do you think that Criterion 9 (b) should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
No opinion

Minor changes should be incorporatedOther
If necessary, please indicate how Criterion 9(b) could be changed.
500 character(s) maximum
8.39. Criterion 9(c). Man-made cellulose fibres (including viscose, modal and lyocell) - Pulp production subcriteria
Original text of Criterion 9(c)
Show
Hide
Pulp used to manufacture fibres shall be bleached without the use of elemental chlorine. The resulting total amount of chlorine and organically bound chlorine in the finished fibres (OX) shall not exceed 150 ppm or in the wastewater from pulp manufacturing (AOX) shall not exceed 0,170 kg/ADt pulp.
Assessment and verification: the applicant shall provide a test report showing compliance with either the OX or the AOX requirement, using the appropriate test method: OX: ISO 11480 (controlled combustion and microcoulometry). AOX: ISO 9562
Do you think that Criterion 9 (c) should be changed?
No, the criterion is adequate and does not need to be changed
© Yes
No opinion Miner changes should be incorporated.
Minor changes should be incorporatedOther
If necessary, please indicate how Criterion 9(c) could be changed.
500 character(s) maximum
8.40. Criterion 9(d). Man-made cellulose fibres (including viscose, modal and lyocell) - Pulp production sub-criteria Original text of Criterion 9(d)
Show
○ Hide

A minimum of 50 % of the pulp used to manufacture fibres shall be purchased from dissolving pulp mills that recover value from their spent process liquors either by:

- (i) Generating on-site electricity and steam
- (ii) Manufacturing chemical co-products.

Assessment and verification: the applicant shall provide a list of pulp suppliers supplying the raw material used to make the fibres and the proportion of pulp that they supply. Documentation and evidence shall be provided that the required proportion of suppliers have the appropriate energy generating equipment and/or co-product recovery and manufacturing systems installed at related production sites.

Do you think that criterion 9 (d) should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 9(d) could be changed.
500 character(s) maximum

8.41. Criterion 9(e). Man-made cellulose fibres (including viscose, modal and lyocell) - Fibre production sub-criteria

Original text of Criterion 9(e)

Show

Hide

For viscose and modal fibres, the sulphur content of the emissions of sulphur compounds to air from fibre production processes, expressed as an annual average, shall not exceed the following performance values in Table 4

Table 4 Viscose and Modal fibre sulphur emissions values

Fibre type	Performance value (g s/kg)
Staple fibre	30g/kg
Filament fibre	
Batch washing Integrated washing	40 g/kg 170 g/kg

Assessment and verification: the applicant shall provide detailed documentation and/or test reports showing compliance with this criterion, together with a declaration of compliance.

Do yo	ou think tha	Criterion 9	(e) should	d be	changed	?
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	17(1)	11111	CHIEROH	15	acecuate	and	CICIES	11()1	need	1()	() ()	CHAL	10100

Yes

No opinion

Minor changes should be incorporated

If necessary, please indicate how Criterion 9(e) could be changed. 500 character(s) maximum
8.42. Criterion 10. Filling
Original text of Criterion 10
ShowHide
10(a) Filling materials consisting of textile fibres shall comply with the textile fibre criteria (1–9) where appropriate.
10(b) Filling materials shall comply with the textile RSL' requirements for biocides and formaldehyde (see Appendix 1).
10(c) Detergents and other chemicals used for the washing of fillings (down, feathers, natural or synthetic fibres) shall comply with the textile RSL' requirements for auxiliary chemicals and for detergents, softeners and complexing agents (see Appendix 1). Assessment and verification: as indicated in the corresponding criteria
Do you think that Criterion 10 should be changed? No, the criterion is adequate and does not need to be changed
O Yes
No opinion
Minor changes should be incorporatedOther
If necessary, please indicate how Criterion 10 could be changed.
500 character(s) maximum
8.43. Criterion 11. Coatings, laminates and membranes
Original text of Criterion 11
Show
Hide
11(a) Components made of polyurethane shall comply with Textile fibre criteria 5(a) relating to organic tin and 5(b) relating to workplace exposure to aromatic diisocyanates and DMAc.

11(b) Components made of polyester shall comply with Textile fibre criteria 7(a) and 7(c) regarding

antimony content and the emission of VOCs during polymerisation.

Other

Assessment and verification: as indicated in the corresponding criteria and/or in the Appendix 1 to this Decision.			
Do you think that Criterion 11 should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other			
If necessary, please indicate how Criterion 11 could be changed. 500 character(s) maximum			
8.44. Criterion 12. Accessories Original text of Criterion 12 Show Hide			
Metal and plastic components such as zips, buttons and fasteners shall comply with the RSL' requirements for accessories (see Appendix 1). Assessment and verification: as indicated in the corresponding criteria.			
Do you think that Criterion 12 should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other			
If necessary, please, indicate how Criterion 12 could be changed. 500 character(s) maximum			
8.45. Chemicals and process criteria - General Original text of the introduction for chemicals and process criteria Show Hide			
The criteria in this section apply, where specified, to the following production stages: (i) Spinning (ii) Fabric formation			

(iii) Pre-treatment

11(c) Polymers shall comply with restriction g(v) of the RSL in Appendix 1 of this Decision.

(vi) Finishing (vii) Cut/make/trim	
Unless specified otherwise these criteria, including the requirements for random testing, shall also apply to fibres containing recycled content.)
Do you think that the introduction for chemicals and process criteria should be changed? No, it is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other	
If necessary, please indicate how the introduction for chemicals and process criteria could be changed. 500 character(s) maximum	

8.46. Criterion 13(a). Restricted Substance List (RSL) - General requirements Original text of the criterion 13(a)

Show

(iv) Dyeing

Hide

The final product and the production recipes used to manufacture the final product shall not contain the hazardous substances listed in the Restricted Substance List at or above the specified concentration limits or according to the specified restrictions. The RSL can be found in Appendix 1. The restrictions in the RSL take precedence over the derogations listed in Criterion 14, Table 6.

The RSL shall be communicated to suppliers and agents responsible for the spinning, dyeing, printing and finishing stages of production. Verification and testing requirements are specified in the RSL for each production stage and for the final product.

Laboratory testing, where required, shall be carried out for each product line based on random sampling. Testing shall be carried out annually during the license period in order to demonstrate ongoing compliance with the RSL.

Assessment and verification: the applicant shall provide a declaration of compliance with the RSL supported by evidence as applicable to the substances and production recipes used to manufacture the final product. The requirements are indicated in the RSL and include declarations obtained from those responsible for related production stages, declarations from chemical suppliers and test results from laboratory analysis of samples of the final product. Declarations obtained from production stages shall be supported by safety data sheets (SDS) for production recipes and, where necessary, declarations from chemical suppliers. SDS shall be completed in accordance with the guidance in Section 2.3,9,10, 11 and

12 of Annex II to Regulation (EC) No 1907/2006 of the European Parliament and of the Council (5)(Guide to the compilation of safety data sheets). Incomplete SDS shall require supplementing by declarations from chemical suppliers.

Laboratory analysis of the final product shall be carried out in a representative way for the licensed product lines, where specified in the RSL and according to the test methods listed. Testing, where required, shall be carried out upon application and once a year thereafter for each product line based on a random sample, with results then communicated to the relevant competent body. Test data obtained for the purposes of compliance with industry RSL's and other schemes shall be accepted where the test methods are equivalent and have been carried out on a representative sample of the final product.

Failure of a test result during a license period shall result in retesting for the specific product line. If the second test fails then the license shall be suspended for the specific product line. Remedial action will then be required in order to re-instate the license.

Do you think that Criterion 13 should be changed?
No, the criterion is adequate and does not need to be changed
Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 13(a) could be changed.
500 character(s) maximum
500 character(s) maximum
500 character(s) maximum
500 character(s) maximum 8.47. Criterion 13(b). Substances of Very High Concern (SVHC's)

The final product including any component or accessory shall not, unless specifically derogated, contain substances that fulfil the following conditions:

(i) They meet the criteria in Article 57 of Regulation (EC) No 1907/2006;

ShowHide

(ii) They have been identified according to the procedure described in Article 59(1) of Regulation (EC) No 1907/2006 which establishes the candidate list for substances of very high concern.

This applies to substances used to impart function to the final product and to substances that have been intentionally used in production formulas.

No derogation shall be given concerning substances of very high concern that are present in a textile article, or in any homogeneous part of a textile article, in concentrations higher than 0,10 % (weight by weight).

Assessment and verification: Substances and recipes used at each production stage shall be screened against the latest version of the candidate list published by ECHA. The applicant shall compile declarations of compliance from each production stage supported by screening documentation.

Where a derogation has been granted then the applicant shall show that use of the substance is in compliance with the concentration limits and derogation conditions set out in the RSL.

Do you think that Criterion 13 (b) should be changed?				
No, the criterion is adequate and does not need to be changed				
O Yes				
No opinion				
Minor changes should be incorporated				
Other				
If necessary, please indicate how Criterion 13(b) could be changed.				
500 character(s) maximum				
8.48. Criterion 14. Substitution of hazardous substances and mixtures used in dyeing, printing and				
finishing - Introduction				
Original text of the introduction to Criterion14				
Show				
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Substances and mixtures applied to fabrics and knitted panels during dyeing, printing and finishing				
processes which remain on the final product and, in accordance with Regulation (EC) No 1272/2008 of the				
European Parliament and of the Council (6), meet the criteria for classification with the hazard classes or				
risk phrases listed in table 5 shall not be used unless they have been specifically derogated. These				
restrictions shall also apply to functional substances incorporated into synthetic fibres and man-made				
cellulose fibres during their manufacturing. This criterion applies to production chemicals in the form in				
which they are applied to the product, either as substances or mixtures.				
Do you think that criterion 14 should be changed?				
No, the criterion is adequate and does not need to be changed				
O Yes				
No opinion				
Minor changes should be incorporated				
Other				
If necessary, please indicate how the introduction to Criterion 14 could be changed				
500 character(s) maximum				

8.49. Criterion 14(a). Hazard classification restrictions

Original text of Criterion	14(a)
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The hazard classifications restricted are listed in Table 5. The most recent classification rules adopted by the European Union shall take precedence over the listed hazard classifications and risk phrases.

Applicants shall therefore ensure that any classifications are based on the most recent classification rules.

The use of substances or mixtures which change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies are exempted from the above requirements. This shall include polymers that have been modified to incorporate a function and monomers or additives which become covalently bonded with polymers.

Table 5
Restricted hazard classifications and risk phrases and their CLP categorisation

-	Acute Toxicity		
-	Category 1 and 2	Category 3	
-	H300 Fatal if swallowed (R28)	H301 Toxic if swallowed (R25)	
-	H310 Fatal in contact with skin (R27)	H311 Toxic in contact with skin (R24)	
-	H330 Fatal if inhaled (R23/26)	H331 Toxic if inhaled (R23)	
-	H304 May be fatal if swallowed and enters airways (R65)	EUH070 Toxic by eye contact (R39/41)	
-	Specific target organ toxicity		
-	Category 1	Category 2	
-	H370 Causes damage to organs (R39/23, R39 /24, R39/25, R39/26, R39/27, R39/28)	H371 May cause damage to organs (R68/20, R68 /21, R68/22)	
-	H372 Causes damage to organs through prolonged or repeated exposure (R48/25, R48 /24, R48/23)	H373 May cause damage to organs through prolonged or repeated exposure (R48/20, R48/21, R48/22)	
-	Respiratory and skin sensitisation		
-	Category 1A	Category 1B	
-	H317: May cause allergic skin reaction (R43)	H317: May cause allergic skin reaction (R43)	
-	H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled (R42)	H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled (R42)	
-	Carcinogenic, mutagenic or toxic for reproduction		
-	Category 1A and 1B	Category 2	
-	H340 May cause genetic defects (R46)	H341 Suspected of causing genetic defects (R68)	

-	H350 May cause cancer (R45)	H351 Suspected of causing cancer (R40)	
-	H350i May cause cancer by inhalation (R49)		
-	H360F May damage fertility (R60)	H361f Suspected of damaging fertility (R62)	
-	H360D May damage the unborn child (R61)	H361d Suspected of damaging the unborn child (R63)	
-	H360FD May damage fertility. May damage the unborn child (R60, R60/61)	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child (R62/63)	
-	H360Fd May damage fertility. Suspected of damaging the unborn child (R60/63)	H362 May cause harm to breast fed children (R64)	
-	H360Df May damage the unborn child. Suspected of damaging fertility (R61/62)		
	Hazardous to the aquatic environment		
-	Hazardous to the aquatic environment		
-	Hazardous to the aquatic environment Category 1 and 2	Category 3 and 4	
-	•	Category 3 and 4 H412 Harmful to aquatic life with long-lasting effects (R52/53)	
-	Category 1 and 2	H412 Harmful to aquatic life with long-lasting	
-	Category 1 and 2 H400 Very toxic to aquatic life (R50) H410 Very toxic to aquatic life with long-lasting	H412 Harmful to aquatic life with long-lasting effects (R52/53) H413 May cause long-lasting effects to aquatic	
-	Category 1 and 2 H400 Very toxic to aquatic life (R50) H410 Very toxic to aquatic life with long-lasting effects (R50/53) H411 Toxic to aquatic life with long-lasting	H412 Harmful to aquatic life with long-lasting effects (R52/53) H413 May cause long-lasting effects to aquatic	

Do you think that Criterion 14 (a) should be changed?

0	No, the criterion is adequate and does not need to be changed
	Yes
	No opinion
	Minor changes should be incorporated
	Other

If necessary, please indicate how Criterion 14(a) could be changed.

5	00 character(s) maximum

8.50. Criterion 14(b). Derogations that apply to textile substance groups Original text of Criterion 14(b)

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In accordance with Article 6(7) of Regulation (EC) No 66/2010 the substance groups in Table 6 are specifically derogated from the requirements set out in Criterion 14(a) and in accordance with the derogation conditions described in Table 6. For each substance group all derogation conditions are provided for the specified hazard classifications. These derogations also apply to substances added to manmade synthetic and cellulosic fibres during their manufacturing.

Table 6
Derogated hazard classifications by substance group

-	Substances that impart function to the final product		
-	Substance group	Derogated hazard classifications	Derogation conditions
-	(i) Dyestuff for dyeing and non- pigment printing	H301, H311, H331, H317, H334	Dust free dye formulations or automatic dosing and dispensing of dyes shall be used by dye houses and printers to minimise worker exposure;
-		H411, H412, H413	Dyeing processes using reactive, direct, vat, sulphur dyes with these classifications shall meet a minimum of one of the following conditions: — Use of high affinity dyes; — Achievement of a reject rate of less than 3,0 % — Use of colour matching instrumentation; — Implementation of standard operating procedures for the dyeing process; — Use of colour removal to treat wastewater in compliance with criterion 16(a) The use of solution dyeing and/or digital printing are exempted from these conditions.
-	(ii) Flame retardants	H317 (1B), H373, H411, H412, H413	 The product must be intended to be used in applications in which it is required to meet fire protection requirements in ISO, EN, Member State or public sector procurement standards and regulations. The product shall meet the requirements for durability of function (see criterion 25) The product must be intended to be used in applications in which it is required to meet fire protection requirements in ISO, EN,

			Member State or public sector procurement standards and regulations. — The product shall meet the requirements for durability of function (see criterion 25)
-		H351 is derogated for the application of antimony trioxide synergist as a backcoating for interior textiles.	 The product must be intended to be used in applications in which it is required to meet fire protection requirements in ISO, EN, Member State or public sector procurement standards and regulations. Emissions to air in the workplace where the flame retardant is applied to the textile product shall meet an eight hour occupational exposure limit value of 0,50 mg/m3.
-	(iii) Optical brighteners	H411, H412, H413	Optical brighteners may only be applied in the following cases: — In white coloured printing; — To achieve enhanced brightness in uniforms and work wear; — As additives during the production of polyamide and polyester with a recycled content.
-	(iv) Water, dirt and stain repellents	H413	The repellent and its degradation products shall be either: — readily and/or inherently biodegradable, or — non-bioaccumulative in the aquatic environment, including aquatic sediment. — The product shall meet the requirements for durability of function (See criterion 25).
-	Other residual substances that may be found on the final product		
-	(v) Auxiliaries, including:carriers, levelling agents, dispersing agents, surfactants, thickeners, binders.	H301, H311, H331, H371, H373, H317 (1B), H334, H411, H412, H413, EUH070,	Recipes shall be formulated using automatic dosing systems and processes shall follow standard operating procedures. Substances classified with H311, H331, H317 (1B) shall not be present on the final product at concentrations of greater than 1,0 % w/w.

Assessment and verification: the applicant shall obtain declarations of compliance from each dyeing, printing and finishing production site and, where necessary, their chemical suppliers. This shall declare that, where used in production recipes, the following substances, together with any additional functional substances used that may remain on the final product, do not meet the criteria for classification with one or more of the hazard classifications and risk phrases listed in Table 5:

- biocides
- dyestuffs and pigments
- auxilliary carriers, levelling agents and dispersing agents
- optical brighteners
- print thickeners, binders and plasticizers
- cross-linking agents (from easy care finishes and printing)
- flame retardants and synergists
- water, dirt and stain repellents
- fabric softeners

Where substances are derogated in Table 6 then the declaration shall specifically identify those derogated substances and provide supporting evidence showing how the derogation conditions are to be met.

If the production formulas include auxiliaries that carry the hazard classifications specified in derogation (v), verification shall be required based on laboratory testing of a final or intermediate product, or alternatively a calculation of the carry-over of classified auxiliaries from production processes onto the final product.

The following technical information shall be provided to support the declaration of classification or nonclassification for each substance:

- (i) For substances that have not been registered under Regulation (EC) No 1907/2006 or which do not yet have a harmonised CLP classification: Information meeting the requirements listed in Annex VII to that Regulation;
- (ii) For substances that have been registered under Regulation (EC) No 1907/2006 and which do not meet the requirements for CLP classification: Information based on the REACH registration dossier confirming the non-classified status of the substance;
- (iii) For substances that have a harmonised classification or are self-classified: SDS where available. If these are not available or the substance is self-classified then information shall be provided relevant to the substances hazard classification according to Annex II to Regulation (EC) No 1907/2006;
- (iv) In the case of mixtures: safety data sheets where available. If these are not available then calculation of the mixture classification shall be provided according to the rules under Regulation (EC) No 1272/2008 together with information relevant to the mixtures hazard classification according to Annex II to Regulation (EC) No 1907/2006.

SDS shall be completed in accordance with the guidance in Section 2.3,9,10, 11 and 12 of Annex II to Regulation (EC) No 1907/2006 (requirements for the compilation of SDS). Incomplete SDS will require supplementing by declarations from chemical suppliers.

Do you think that Criterion 14 (b) should be changed?	
No, the criterion is adequate and does not need to be changed	

- Yes
- No opinion
- Minor changes should be incorporated

If nece	essary, please indicate how Criterion 14(a) could be changed.
500	character(s) maximum
8 5 1 (Criterion 15. Washing, drying and curing energy efficiency
	eal text of Criterion 15
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Other

The applicant shall demonstrate that the energy used in washing, drying and curing steps associated with dyeing, printing and finishing steps for ecolabelled products is measured and benchmarked as part of an energy or carbon dioxide emissions management system.

Furthermore, they shall demonstrate that production sites have implemented a minimum number of Best Available Techniques (BAT) energy efficiency techniques as specified in Table 7 and as listed in Appendix 3 to this decision.

Table 7
Washing, rinsing and drying energy efficiency techniques

BAT themes	Production volume	
	< 10 tonnes/day	> 10 tonnes/day
General energy management	Two techniques	Three techniques
2. Washing and rinsing processes	One technique	Two techniques
3. Drying and curing using stenter frames	One technique	Two techniques

Assessment and verification: the applicant shall compile reporting from energy management systems for each dyeing, printing and finishing production site. ISO 50001 or equivalent systems for energy or carbon dioxide emissions shall be accepted as evidence for the energy management system.

The evidence required of BAT implementation shall include, as a minimum, site photographs, technical descriptions of each technique and evaluations of the energy savings achieved.

Do you think that Criterion 15 should be changed?

Do you think that official to chould be officially
No, the criterion is adequate and does not need to be changed
Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 15 could be changed 500 character(s) maximum
8.52. Criterion 16(a). Wastewater discharges from wet processing
Original text of Criterion 16(a)

Wastewater discharges to the environment shall not exceed 20 g COD/kg textiles processed. This requirement shall apply to weaving, dyeing, printing and finishing processes used to manufacture the product(s). The requirement shall be measured downstream of on-site wastewater treatment plant and/or off-site wastewater treatment plant receiving wastewater from these processing sites.

If the effluent is treated on site and discharged directly to surface waters, it shall also meet the following requirements:

- (i) pH between 6,0 and 9,0 (unless the pH of the receiving water is outside this range)
- (ii) temperature of less than 35 oC (unless the temperature of the receiving water is above this value)

If colour removal is required by a derogation condition in criterion 14 then the following spectral absorption coefficients shall be met:

- (i) 436 nm (yellow sector) 7 m-1
- (ii) 525 nm (red sector) 5 m-1

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(iii) 620 nm (blue sector) 3 m-1

Assessment and verification: the applicant shall provide detailed documentation and test reports, using ISO 6060 and ISO 7887 as relevant, and showing compliance with this criterion on the basis of monthly averages for the six months preceding the application, together with a declaration of compliance. The data shall demonstrate compliance by the production site or, if the effluent is treated off-site, by the wastewater treatment operator.

Do you think that Criterion 16 (a) should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
No opinion
 Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 16(a) could be changed.
500 character(s) maximum
8.53. Criterion 16(b). Emissions to air from printing and finishing processes
Original text of Criterion 16(b)
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Total emissions of organic compounds, as defined in Council Directive 1999/13/EC (7), from textile
printing and finishing production sites used to manufacture the ecolabelled product(s) shall not exceed
100,0 mg C/Nm3.
Where textile coating and drying processes allow for the recovery and reuse of solvents an emissions limit
of 150,0 mg C/Nm3 shall apply.
Finishing processes include the thermosetting, thermosoling, coating and impregnating of textiles including
their respective drying (stenter) facilities.
Assessment and verification: the applicant shall demonstrate compliance according to EN 12619 or other
equivalent standards. Calculation of the emissions of organic compounds based on the method described
in the most current European Commission Reference document for best available techniques for the
Textiles Industry shall also be accepted. Monthly averages for the total emissions of organic compounds
from production sites shall be provided for the six months preceding the application. Where recovery and
reuse of solvents is carried out then monitoring data shall be provided to evidence the operation of these
systems.
Do you think that Criterion 16 (b) should be changed?
No, the criterion is adequate and does not need to be changed
© Yes
O No opinion
Minor changes should be incorporated
Other
If page control plages indicate how Critories 16(h) sould be changed
If necessary, please indicate how Criterion 16(b) could be changed.
500 character(s) maximum

8.54. Criterion 17. Dimensional changes during washing and dryingOriginal text of Criterion17Show

The dimensional changes after washing and drying at either domestic or industrial washing temperatures and conditions shall not exceed those specified in Table 8.

Table 8
Tolerances for dimensional changes during washing and drying

Textile products or type of material	Dimensional changes during washing and drying
Knitted fabrics	± 4,0 %
Chunky knit	± 6,0 %
Interlock	± 5,0 %
Woven fabrics:	
Cotton and cotton mix Wool mix Synthetic fibres	± 3,0 % ± 2,0 % ± 2,0 %
Socks and hosiery	± 8,0 %
Bathroom linen, including terry towelling and fine rib fabrics	± 8,0 %
Washable and removable woven upholstery — Curtains and furniture fabric	± 2,0 %
— Mattress ticking	
Non-woven fabrics	
Mattress ticking All other fabrics	± 5,0 % ± 6,0 %

This criterion does not apply to:

(a) fibres or yarn;

Hide

- (b) products clearly labelled 'dry clean only' or equivalent;
- (c) furniture fabrics that are not removable and washable.

Assessment and verification: the applicant shall provide test reports using the standards appropriate for the product.

For domestic washing EN ISO 6330 in combination with EN ISO 5077 shall be used as follows: three washes at temperatures as indicated on the product, with tumble drying after each washing cycle.

For commercial washing in industrial laundries ISO 15797 in combination with EN ISO 5077 shall be used at a minimum of 75 °C or as indicated in the standard for the fibre and bleaching combination. Drying shall be as indicated on the product label.

Alternatively for removable and washable mattress ticking EN ISO 6330 in combination with EN 25077 shall be used. The default conditions shall be washing 3A (60 °C) and drying C (flat drying) unless the product label states otherwise.

Do you think that Criterion 17 should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
If necessary, please indicate how Criterion 17 could be changed.
500 character(s) maximum
8.55. Criterion 18. Colour fastness to washing Original text of Criterion 18 Show Hide
The colour fastness to washing shall be at least level 3-4 for colour change and at least level 3-4 for staining.
This criterion does not apply to products labelled 'dry clean only' or equivalent (in so far as it is normal practice for such products to be so labelled), to white products or products that are neither dyed nor printed or to non-washable furniture fabrics.
Assessment and verification: for domestic washing the applicant shall provide test reports using the test method: ISO 105 C06 (single wash, at temperature as marked on the product, with perborate powder).
For commercial washing in industrial laundries ISO 15797 in combination with ISO 105 C06 shall be used at a minimum of 75 °C or as indicated in the standard for the fibre and bleaching combination.
Do you think that Criterion 18 should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated

Other

If necessary, please indicate how Criterion 18 could be changed 500 character(s) maximum
8.56. Criterion 19. Colour fastness to perspiration (acid, alkaline)
Original text of Criterion 19
Show
○ Hide
The colour fastness to perspiration (acid and alkaline) shall be at least level 3-4 (colour change and staining). A level of 3 is nevertheless allowed when fabrics are both dark coloured (standard depth > 1/1) and made of regenerated wool. This criterion does not apply to white products, to products that are neither dyed nor printed, to furniture fabrics, curtains or similar textiles intended for interior decoration.
Assessment and verification: the applicant shall provide test reports using the following test method: ISO 105 E04 (acid and alkaline, comparison with multi-fibre fabric).
Do you think that Criterion 19 should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 19 could be changed.
500 character(s) maximum
8.57. Criterion 20. Colour fastness to wet rubbing
Original text of Criterion 20
Show
O Hide
The colour fastness to wet rubbing shall be at least level 2-3. A level of 2 is allowed for dark coloured denim

The colour fastness to wet rubbing shall be at least level 2-3. A level of 2 is allowed for dark coloured denim and a level of 1 for all other denim colour shades.

This criterion does not apply to white products or products that are neither dyed nor printed.

Assessment and verification : the applicant shall provide test reports using the following test method: ISO 105 X12.

Do you think that Criterion 20 should be changed?

No, the criterion is adequate and does not need to be changed

Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 20 could be changed.
500 character(s) maximum
out onaracter(3) maximum
8.58. Criterion 21. Colour fastness to dry rubbing
Original text of Criterion 21
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The colour fastness to dry rubbing shall be at least level 4. A level of 3-4 is allowed for dark coloured denim
and a level of 2-3 for all other denim colour shades.
and a lover of 2 o for all other definitioned shades.
This criterion does not apply to white products or products that are neither dyed nor printed, or to curtains
or similar textiles intended for interior decoration.
of diffinal toxinos interface for interfer decoration.
Assessment and verification: the applicant shall provide test reports using the following test method: ISO
105 X12.
Do you think that Criterion 21 should be changed?
No, the criterion is adequate and does not need to be changed
© Yes
No opinion
Minor changes should be incorporated
Other
Other
If necessary, please indicate how Criterion 21 could be changed.
500 character(s) maximum
out onaractor(s) maximum
8.59. Criterion 22. Colour fastness to light
Original text of Criterion 22
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O Hide

For fabrics intended for furniture, curtains or drapes, the colour fastness to light shall be at least level 5. For all other products the colour fastness to light shall be at least level 4.

A level of 4 is nevertheless allowed when fabrics intended for furniture, curtains or drapes are both light coloured (standard depth < 1/12) and made of more than 20 % wool or other keratin fibres, or more than 20 % linen or other bast fibres.

This requirement does not apply to mattress ticking, mattress protection or underwear.

Assessment and verification : the applicant shall provide test reports using the following test method: ISO 105 B02.

Do you think that Criterion 22 should be changed?
No, the criterion is adequate and does not need to be changed
Yes
O No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 22 could be changed. 500 character(s) maximum
9.60 Critarian 22 Week resistance and shootheney of cleaning products
8.60. Criterion 23. Wash resistance and absorbency of cleaning products
Original text of Criterion 23
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Hide

Cleaning products shall be wash resistant and absorbent according to the relevant testing parameters identified in Tables 9 and 10. The testing specified for absorbency shall not apply to twisted yarn products.

Table 9
Values and parameters for the wash resistance of cleaning products

Textile cleaning products or type of material	Numbers of washes	Temperature	EN ISO 6630 test reference
Woven and non-woven products for wet cleaning	80	40 °C	Procedure 4N
Microfibre products for dusting	200	40 °C	Procedure 4N
Products deriving from recycled textile fibres	20	30 °C	Procedure 3G
Mops for washing floors	200	60 °C	Procedure 6N
Cloths for washing floors	5	30 °C	Procedure 3G

Table 10 Values and parameters for the absorbency of cleaning products

Yes

No opinion

Textile cleaning products or type of material	Liquid absorbency time
Products deriving from recycled textile fibres	≤ 10 seconds
Microfibre products for surface and floor cleaning	≤ 10 seconds
Woven and non-woven products for wet cleaning	≤ 10 seconds
Products for washing floors	≤ 10 seconds

	Products for washing floors	≤ 10 seconds		
Assessment and verification: the applicant shall provide test reports using the following test methods as relevant: EN ISO 6330 and EN ISO 9073-6. Testing according to EN ISO 6330 shall be carried out using washing machine type A for all products and materials.				
0	ou think that Criterion 23 should be changed? No, the criterion is adequate and does not need to be Yes No opinion Minor changes should be incorporated Other	e changed		
	cessary, please indicate how Criterion 23 could be c	changed.		
	character(3) maximum			
	Criterion 24. Fabric resistance to pilling and abrast nal text of Criterion 24 Show Hide	iion		
	woven fabrics and knitted garments, accessories are ester (including fleece), shall resist pilling to rating or		wool blends and	
Assessubst	en cotton fabrics used for garments shall resist pilling eggings shall resist to a rating of a minimum of 2. essment and verification: the applicant shall provide trate: hitted and non-woven products: ISO 12945-1 Pill bo oven fabrics: ISO 12945-2 Martindale method	reports from tests carried		
Do yo	ou think that Criterion 24 should be changed? No, the criterion is adequate and does not need to be	e changed		

Minor changes should be incorporatedOther
If necessary, please indicate how Criterion 24 could be changed.
500 character(s) maximum
 8.62. Criterion 25. Durability of function – Introduction Original text of the introduction to Criterion 25 Show Hide
Finishes, treatments and additives that impart water, oil and stain repellency flame retardancy and easy care (also referred to as non-crease or permanent press) to the textile product when it is in use shall be durable according to the values and parameters set out in sub-criteria 25(a), (b) and (c).
For water, oil and stain repellents consumers shall be provided with guidance on how to maintain the functionality of finishes applied to the product.
Textile fibres, fabrics and membranes that lend the final product intrinsic functional properties are exempt from these requirements.
Assessment and verification: for products with intrinsic properties applicants shall provide test reports demonstrating comparable or improved performance compared with alternatives that may be applied as finishes.
Do you think that Criterion 25 should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
If necessary, please indicate how the introduction to Criterion 25 could be changed. 500 character(s) maximum
 8.63. Criterion 25(a). Water, oil and stain repellent functions Original text of Criterion 25(a) Show Hide

Water repellents shall retain a functionality of 80 out of 90 after 20 domestic wash and tumble dry cycles at 40 °C, or after 10 industrial washing and drying cycles at a minimum of 75 °C.

Oil repellents shall retain a functionality of 3,5 out of 4,0 after 20 domestic wash and tumble dry cycles at 40 °C, or after 10 industrial washing and drying cycles at a minimum of 75 °C.

Stain repellents shall retain a functionality of 3,0 out of 5,0 after 20 domestic wash and tumble dry cycles at 40 °C, or after 10 industrial washing and drying cycles at a minimum of 75 °C.

Industrial washing temperatures may be reduced to 60 °C for garments with taped seams.
Assessment and verification: the applicant shall provide reports from tests carried out according to the following standards, as appropriate to the product:
For all products domestic wash cycles ISO 6330 or industrial laundry cycles ISO 15797 in combination with: — water repellents: ISO 4920 — oil repellents: ISO 14419 — stain repellents: ISO 22958
Do you think that Criterion 25 (a) should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
If necessary, please indicate how Criterion 25(a) could be changed 500 character(s) maximum
8.64. Criterion 25(b). Flame retardant functionsOriginal text of Criterion 25(b)ShowHide
Washable products shall retain their functionality after 50 industrial wash and tumble dry cycles at a minimum of 75 °C. Non-washable products shall retain their functionality after a soak test.
Assessment and verification: The applicant shall provide reports from tests carried out according to the following standards, as appropriate to the product:
For domestic wash cycles ISO 6330 or commercial laundry cycles EN ISO 10528 both in combination with EN ISO 12138. Where the textile is non-removable BS 5651 or equivalent.
Do you think that Criterion 25 (b) should be changed?

No, the criterion is adequate and does not need to be changed

Yes

No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how the introduction to Criterion 25(b) could be changed.
500 character(s) maximum
9.65 (Pritarian 25/a) Fear care (also referred to as non around a parmanent proces)
8.65. Criterion 25(c). Easy-care (also referred to as non-crease or permanent press)
Original text of Criterion 25(c)
Show
Hide
Natural fibre products shall achieve an SA-3 fabric smoothness grade and blended natural and synthetic
fibre products an SA-4 fabric smoothness grade after 10 domestic wash and tumble drying cycles at 40 °C.
According to the configuration of the configuration
Assessment and verification: the applicant shall provide reports from tests carried out according to the ISO
7768 test method for assessing the smoothness appearance of fabrics after washing.
Do you think that Critarian 25 (a) should be shoulded
Do you think that Criterion 25 (c) should be changed?
No, the criterion is adequate and does not need to be changed
O Yes
No opinion
Minor changes should be incorporated
Other
If necessary, please indicate how Criterion 25(c) could be changed.
500 character(s) maximum
8.66. Corporate social responsibility criteria - Introduction
Original text of the introduction to corporate social responsibility criteria
Show
Hide
Criteria 26 and 27 address labour conditions and human rights at work. Criterion 26 applies to the cut/make
/trim stages of production for textile products whereas criterion 27 specifically applies to the production of
denim.
Do you think that the introduction to corporate social responsibility criteria should be changed?
No, the introduction is adequate and does not need to be changed.
 No, the introduction is adequate and does not need to be changed Yes
No opinion Minor changes should be incorporated
Minor changes should be incorporated

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If necessary, please indicate how the introduction to corporate social responsibility criteria could be changed.

5	500 character(s) maximum				

8.67. Criterion 26. Fundamental principles and rights at work

Original text of Criterion 26

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Applicants shall ensure that the fundamental principles and rights at work as described in the International Labour Organisation's (ILO) Core Labour Standards, the UN Global Compact and the OECD Guidelines for Multi-National Enterprises shall be observed by all cut/make/trim production sites used to manufacture the licensed product(s). For the purpose of verification the following ILO Core Labour Standards shall be referred to:

Table 10 Values and parameters for the absorbency of cleaning products

029	Forced Labour
087	Freedom of Association and Protection of the Right to Organise
098	Right to Organise and Collective Bargaining
100	Equal remuneration
105	Abolition of Forced Labour
111	Discrimination (Employment and Occupation)
155	Occupational safety and health
138	Minimum Age Convention
182	Elimination of the Worst Forms of Child Labour

These standards shall be communicated to cut/make/trim production sites used to manufacture the final product.

Assessment and verification: the applicant shall demonstrate third party verification of compliance, using independent verification or documentary evidence, including site visits by auditors during the Ecolabel verification process for cut/make/trim production sites in the supply chain for their licensed products. This shall take place upon application and subsequently during the license period if new production sites are introduced.

In countries where ILO Labour Inspection Convention, 1947 (No 81) has been ratified and ILO supervision indicates that the national labour inspection system is effective and the scope of the inspection system

covers the areas listed above (8), verification by labour inspector(s) appointed by a public authority shall be accepted.
Do you think that Criterion 26 should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
If necessary, please indicate how Criterion 26 could be changed.
500 character(s) maximum
8.68. Criterion 27. Restriction on the sandblasting of denim Original text of Criterion 27 Show Hide
The use of manual and mechanical sandblasting to achieve distressed denim finishes shall not be permitted.
Assessment and verification: the applicant shall provide details of all production sites used to produce ecolabelled denim products together with documentary and photographic evidence of the alternative processes used to achieve distressed denim finishes.
Do you think that Criterion 27 should be changed? No, the criterion is adequate and does not need to be changed Yes No opinion Minor changes should be incorporated Other
If necessary, please indicate how Criterion 27 could be changed. 500 character(s) maximum
8.69. Criterion 28. Information appearing on the Ecolabel Original text of Criterion 28 Show

The optional label with text box may contain wording selected from the following:

— More sustainable fibre production (or a text selected from Table 11 below)

Hide

- Less polluting production processes
- Restrictions on hazardous substances
- Tested for durability

Table 11
Text that may appear alongside the Ecolabel depending on product content

Fibres used	Production specification	Text that may be displayed	
Cotton fibres	Organic content of more than 50 %	Made with xx % organic cotton. Only GMO-free cotton used	
	Organic content of more than 95 %	Made with organic cotton. Only GMO-free cotton used	
Man made	Certified sustainable pulp of more than 25 %	Made using xx % wood from sustainable forests	
	Certified sustainable pulp of more than 95 %	Made using wood from sustainable forests	
Polyamide	Recycled content of more than 20 %	Made with xx % recycled nylon	
	Recycled content of more than 95 %	Made with recycled nylon	
Polyester	Recycled content of more than 50 %	Made with xx % recycled polyester	
	Recycled content of more than 95 %	Made with recycled polyester	

Assessment and verification: the applicant shall provide a sample of the product packaging showing the label, together with a declaration of compliance with this criterion.

Do you tim	ık that Criterion 28 should be changed?
No, f	the criterion is adequate and does not need to be changed
Yes	
O No c	ppinion
Minc	or changes should be incorporated
Othe	er
	y, please indicate how Criterion 28 could be changed.
500 chara	cter(s) maximum
500 chara	cter(s) maximum
8.70. Appe	endix 1. EU Ecolabel textile restricted substance list

The EU Ecolabel RSL consists of restrictions that apply to the following production stages in the textile supply chain:

- (a) fibre and yarn spinning
- (b) bleaching and pre-treatment
- (c) dye houses

ShowHide

- (d) printing processes
- (e) finishing processes
- (f) all production stages
- (g) the final product

A number of restrictions under (g) also apply to the final product, for which analytical testing may be required.

(a) Restrictions applying to fibre and yarn spinning and weaving

Substance group	Scope of restriction	Limit values	Verification requirements
(i) Sizing preparations applied to fibres and yarns Applicability: Spinning processes	At least 95 % (by dry weight) of the component substances shall be readily biodegradable. In all cases the sum of each component shall be taken into account.	Readily biodegradable: 70 % degradation of dissolved organic carbon within 28 days or 60 % of theoretical maximum oxygen depletion or carbon dioxide generation within 28 days.	Verification: Declaration from the chemical supplier supported by OECD or ISO test results Test method: OECD 301 A, ISO 7827 OECD 301 B, ISO 9439 OECD 301 C, (2) OECD 301 D, ISO 10708 OECD 301 E, OECD 301 F, ISO 9408,
(ii) Spinning solution additives, spinning additives and preparation agents (including carding oils, spin finishes and lubricants) Applicability: Primary spinning processes	At least 90 % (by dry weight) of the component substances shall be readily biodegradable, inherently biodegradable or eliminable in waste water treatment plants. In all cases the sum of each component shall be taken into account.	Readily biodegradable: See definition under (a)(ii) Inherently biodegradable: 70 % degradation of dissolved organic carbon within 28 days or 60 % of theoretical maximum oxygen depletion or carbon dioxide generation within 28 days. Eliminability: 80 % degradation of dissolved organic carbon within 28 days	Verification: Declaration from chemical supplies supported by OECD or ISO test results Test method: See (a)(ii) for readily biodegradable tests. Inherently biodegradable tests that are accepted: ISO 14593 OECD 302 A, ISO 9887, OECD 302 B, ISO 9888 OECD 302 C, Tests for eliminability: OECD 3034//B ISO 11733

(b) Restrictions applying to bleaching

Substance group	Scope of restriction	Limit values	Verification requirements
Bleaching of yarns, fabrics and end products Applicability: All fibre types	Chlorine agents shall not be used for the bleaching of any yarns, fabrics, knitted panels or end-products with the exception of man-made cellulose fibres.	n/a	Verification: Declaration of non-use by production stage(s)

(c) Restrictions applying to dye houses

Substance group	Scope of restriction	Limit values	Verification requirements
(i) Halogenated carriers Applicability: Polyester, polyester-wool blends, acrylic and polyamide where disperse dyes are used.	Halogenated dyeing accelerants (carriers) shall not be used to dye synthetic fibres and fabrics or polyester-wool blends. Examples of carriers include1,2-dichlorobenzene, 1,2,4-trichlorobenzene, chlorophenoxyethanol.	n/a	Verification: Declaration of non-use from the chemical supplier supported by SDS.
(ii) Azo dyes Applicability: Application of colours from Appendix 2 to acrylic, cotton, polyamide, wool fibres, knits and fabrics.	Azo dyes shall not be used that may cleave to aromatic amines that are known to be carcinogenic. Appendix 2 contains a list of restricted aryl amines and an indicative list of azo dyes that may cleave to these aryl amines. The latter should be used as a guide to dyes that should not be used. The limit value for aryl amines shall be applied to the final product.	30 mg/kg for each amine (1)	Verification: Final product testing to be carried out as specified. Test method: EN 14362-1 and 3.
(iii) CMR dyes Applicability: All products.	Dyes shall not be used that are carcinogenic, mutagenic or toxic to reproduction. Appendix 2 contains a listing of CMR dyes that shall not be used.	n/a	Verification: Declaration of non-use from the chemical supplier supported by SDS.
(iv) Chrome mordant dyes Applicability: Wool, polyamide	Metal complex dyes based on copper, chrome and nickel shall only be permitted for dyeing: — wool fibres — polyamide fibres — blends of wool and/or polyamide with man-made cellulose fibres.	n/a	Verification: Declaration of non-use from the chemical supplier supported by SDS
			Verification:
(v) Metal complex dyes	Metal complex dyes based on copper, chrome and nickel shall only be permitted for dyeing: — wool fibres		

	Applicability:	— polyamide fibres	n/a	Declaration of non-use
	Polyamide, wool, cellulose fibres	— blends of wool and/or polyamide with man-made cellulose fibres.		from the chemical
				supplier supported by SDS
(1) Measures should be taken to avoid false positives from the presence of 4-aminoazobenzene				

(d) Restrictions applying to printing processes

Printing			
i) Dyes and pigments	Dyes and pigments used to print ecolabelled textiles shall comply with the restrictions applying to dye houses (Section c of this Appendix).	Please refer to the dye house restrictions (Section c)	Verification: As specified for dye houses
(ii) Printing pastes Applicability: Where printing is applied	Printing pastes used shall not contain more than 5 % Volatile Organic Compounds (VOC's). These may include: — aliphatic hydrocarbons (C10 — C20) — monomers such as acrylates, vinyl acetates, styrene — monomers such as acrylonitrile, acrylamide, butadiene — alcohols, esters, polyols — formaldehyde — phosphoric acid esters — benzene as impurity from upper hydrocarbons — ammonia (e.g., urea decomposition, biuret reaction)	< 5,0 % w/w VOC content	Verification: Declaration from applicant that no printing has been made or Declaration from printer supported by SDS and /or calculations for the printing paste.
(iii) Plastisol binders Applicability: Where printing is applied	'Plastisol' additives to print binders, including PVC and restricted phthalates, shall not be used.	n/a	Verification: Declaration from applicant that no printing has been made or Declaration of non-use from chemical suppliers supported by SDS for additives.

(e) Restrictions applying to finishing processes

Functional finishes, treatments and additives			
(i) Biocide finishes used to impart biocidal properties to the final products. Applicability: All products	Biocidal products (within the meaning of Article 3(1)(a) of Regulation (EU) No 528/2012 of the European Parliament and of the Council (1) shall not be incorporated into fibres, fabrics or the final product in order to impart biocidal properties. Common examples include triclosan, nano-silver, zinc organic compounds, tin organic compounds, dichlorophenyl(ester) compounds, benzimidazol derivatives and isothiazolinones.	n/a	Verification: Declaration of non-use from the applicant
(ii) Anti-felting and shrink resistance Applicability: Where applied.	Halogenated substances or preparations shall only be applied to wool slivers and loose scoured wool.	n/a	Verification: Declaration of non-use from wool processors.
(iii) Water, stain and oil repellent treatments Applicability: Where applied to provide the function.	Fluorinated water, stain and oil repellent treatments shall not be used. These shall include perfluorinated and polyfluorinated treatments. Non-fluorinated treatments shall be readily and/or ultimately biodegradable, or non-bioaccumulative in the aquatic environment, including in aquatic sediment. They shall additionally comply with fitness for use criterion 25(a).	n/a	Verification: Declaration of non-use supported by SDS for the repellents used to be provide by finishers. Test method: n/a
(iv) Flame retardants Applicability: Where applied and as specified for synergists.	The following flame retardants shall not be used: HBCDD — Hexabromocyclododecane PeBDE — Pentabromodiphenyl ether OcBDE — Octabromidiphenyl ether DecaBDE — Decabromodiphenyl ether PBBs — Polybrominated biphenyls TEPA — Tris(aziridinyl) phosphinoxide TRIS — Tris (2,3 dibromopropyl) phosphate TCEP — Tris (2,chloroethyl)phosphate Paraffin, C10-C13, chlorinated (SCCP)	n/a	Verification: Declaration of non-use supported by SDS

inte	e synergist antimony trioxide (H351) is derogated for use as a synergist for the backcoating of erior textiles only under the condition that the product is required to be flame retardant and that orkplace occupational exposure limit values are met.	Eight hour mean shift value ELV for 0,50 mg /m3	Verification: Monitoring data shall be provided by the finisher where the antimony trioxide is applied.
(1) Regulation (EU) No 528/2012 (27.6.2012, p. 1).	of the European Parliament and of the Council of 22 May 2012 concerning the making available of	on the market and use of bi	ocidal products (OJ L 167,

(f) Restrictions applying to all production stages

Substances of Very Hi	igh Concern (SVHC's)		
(i) Substances that have been entered onto the ECHA Candidate List. Applicability	SVHC's that have been identified according to Article 59 of Regulation (EC) No 1907/2006 (REACH) as meeting the criteria of Article 57 of that Regulation and are listed in the candidate list for eventual inclusion in Annex XIV of REACH ('Candidate List') that is current at the time of application shall not be present in the final product, either or to impart function to the final product or that have been intentionally used during production stages, unless a derogation has been approved. The current Candidate List can be consulted at: http://echa.europa.eu/web/guest/candidate-list-table No derogation from the exclusion in this criterion shall be given concerning substances identified as SVHC's and which have been entered onto the list foreseen in Article 59 of Regulation (EC) No 1907/2006, and which are present in the article or in any homogenous part of it in concentrations of more than 0,10 %.	n/a	Verification: Declaration of compliance by each production stage an their chemical suppliers.
Detergents, surfactant	ts, softeners and complexing agents		
(ii) All detergents, surfactants, fabric softeners and complexing agents Applicability: All wet processes	At least 95 % by total weight of all fabric softeners, complexing agents, detergents and surfactants used at each wet processing site shall be: — readily biodegradable under aerobic conditions, or — inherently biodegradable, and/or — eliminable in wastewater treatment plants. The latest revision of the detergents ingredients database should be used as a reference point for biodegradability: http://ec.europa.eu/environment/ecolabel/documents/did_list/didlist_part_a_en.pdf	n/a	Verification: Declaration chemic supplier supported SDS and/or OECD ISO test results Test method: See sizing and spinning agents (Appendix 1(a) i/ii)
(iii) Non-ionic and cationic detergents and surfactants	Non-ionic and cationic detergents and surfactants used at each wet processing site that are classified as hazardous to the aquatic environment according to Regulation (EC) No 1272/2008 shall be ultimately biodegradable under anaerobic conditions	n/a	Verification: Declaration from SI and/or chemical supplier supported OECD or ISO test results

Applicability: All wet processes	The detergents ingredients database should be used as a reference point for biodegradability: http://ec.europa.eu/environment/ecolabel/documents/did_list/didlist_part_a_en.pdf		Test method: EN ISO 11734, ECETOC No 28 OECD 311
Auxiliaries			
(iv) Auxiliaries used in preparations and formulations. Applicability: All products.	The following substances shall not be used in any preparations or formulations used for textiles and are subject to limit values for their presence on the final product: Nonylphenol, mixed isomers 4-Nonylphenol 4-Nonylphenol, branched Octylphenol 4-Octylphenol 4-tert-Octylphenol	25 mg/kg sum total	Verification: Final product testing Test method: Solvent extraction followed by LCMS
	Alkylphenolethoxylates (APEOs) and their derivatives: Polyoxyethylated octyl phenol Polyoxyethylated nonyl phenol Polyoxyethylated p-nonyl phenol	25 mg/kg sum total	Verification: Final product testing Test method: ISO 18254
	The following substances shall not be used in any textile preparations or formulations: bis(hydrogenated tallow alkyl) dimethyl ammonium chloride (DTDMAC) distearyl dimethyl ammonium chloride (DSDMAC) di(hardened tallow) dimethyl ammonium chloride (DHTDMAC) ethylene diamine tetra acetate (EDTA), diethylene triamine penta acetate (DTPA) 4-(1,1,3,3-tetramethylbutyl)phenol 1-Methyl-2-pyrrolidone Nitrilotriacetic acid (NTA)	n/a	Verification: Declaration of non-use from the chemical suppliers supported by SDS for all production stages.

(g) Restrictions applying to the final product

(i) Candidate List SVHC's that are derogated. Applicability: Elastane, acrylic	N,N-Dimethylacetamide (127-19-5) The following limit values apply to end products containing elastane and acrylic: — Products for babies and children under 3 years old (0,001 % w/w) — Products that are in direct contact with the skin (0,005 % w /w) — Garments with limited skin contact and interior textiles (0,005 % w/w)	Verification: Final product testing Test method: Solvent extraction, GCMS or LCMS
(ii) Formaldehyde residues Applicability: All products. Specific conditions apply to garments with easy care finishes (also referred to as non-crease or permanent press)	The following limit values apply to residual formaldehyde from easy care finishes: — Products for babies and children under 3 years old. (16 ppm) — All products that are in direct contact with the skin (16 ppm) — Garments with limited skin contact and interior textiles (75 ppm)	Verification: Final product testing for products with an easy care finish. A declaration of non-use is required for all other products. Test method: EN ISO 14184-1
(iii) Biocides used to protect textiles during transportation and storage. Applicability:	Only biocidal products that contain active substances that are approved under Regulation (EC) No 528/2012 of the European Parliament and of the Council (1) are permitted for use. Applicants should consult the most current authorisation list: https://echa.europa.eu/web/guest/information-on-chemicals/biocidal-active-substances The following substances are restricted:	Verification: Declaration of non-use prior to shipping a storage supported by SDS.

All products	 — Chlorophenols (their salts and esters) — Polychlorinated biphenyls (PCB) — Organotin compounds, including TBT, TPhT, DBT and DOT — Dimethyl fumarate (DMFu) 	
	The following limit values apply to products intended for babies and children under 3 years old: Antimony (Sb) 30,0 mg/kg Arsenic (As) 0,2 mg/kg Cadmium (Cd) 0,1 mg/kg Chromium (Cr) — Textiles dyed with metal complex dyes 1,0 mg/kg — All other textiles 0,5 mg/kg Copper (Cu) 25,0 mg/kg Lead (Pb) 0,2 mg/kg Nickel (Ni) — Textiles dyed with metal complex dyes 1,0 mg/kg — All other textiles 0,5 mg/kg — All other textiles 0,2 mg/kg Nickel (Ni) — Textiles dyed with metal complex dyes 1,0 mg/kg — All other textiles 0,5 mg/kg	Verification: Final product testing Test method:
(iv) Extractable metals	Mercury (Hg) 0,02 mg/kg Antimony (Sb) 30,0 mg/kg	Extraction — EN ISO 105-E04-2013 (Acid sweat solution)

A	applicability:	The following limit values apply to all other products including	Detection — ICP-MS or ICP-OES
A	all products with different limit	interior textiles:	
V	alues applying to babies and	Antimony (Sb)	Verification:
С	hildren under 3 years old.	30,0 mg/kg	
		Arsenic (As)	Final product testing
		1,0 mg/kg	Test method:
		Cadmium (Cd)	Extraction — DIN EN ISO 105-E04-2013
		0,1 mg/kg	(Acid sweat solution) Detection — ICP-MS
		Chromium (Cr)	or ICP-OES
		— Textiles dyed with metal complex dyes	
		2,0 mg/kg	
		— All other textiles	
		1,0 mg/kg	
		Cobalt (Co)	
		— Textiles dyed with metal complex dyes	
		4,0 mg/kg	
		— All other textiles	
		1,0 mg/kg	
		Copper (Cu)	
		50,0 mg/kg	
		Lead (Pb)	
		1,0 mg/kg	
		Nickel (Ni)	
		1,0 mg/kg	
		Mercury (Hg)	
		0,02 mg/kg	
		Polymers shall not contain the following phthalates:	
		DEHP (Bis-(2-ethylhexyl)-phthalate)	Verification:
		BBP (Butylbenzylphthalate)	vormoation.
		DBP (Dibutylphthalate)	

(v) Coatings, laminates and	DMEP (Bis2-methoxyethyl) phthalate	Declaration of non-use by polymer
membranes	DIBP (Diisobutylphthalat)	manufacturer supported by SDS for the
	DIHP (Di-C6-8-branched alkyphthalates)	plasticisers used in the formulation. Where
Applicability:	DHNUP (Di-C7-11-branched alkylphthalates)	the information is not available testing may
Where incorporated into textile	DHP (Di-n-hexylphthalate)	be requested.
structure		Test method:
	(Sum total 0,10 % w/w)	EN ISO 14389
	For metal accessories:	
	A migration limit shall apply to nickel-containing metal alloys	
	that are in direct and prolonged contact with the skin.	
	Nickel 0,5 µg/cm2/week	
	Additionally testing shall be carried out for the presence of	
	the following metals, to which the following limit values shall	Verification:
	apply:	
(vi) Accessories such as		Testing of the composition of the metal
buttons, rivets and zips	Lead (Pb),	components.
Applicability:	90 mg/kg	Test methods:
Where incorporated into	Cadmium (Cd)	For nickel migration
garment structure		EN 12472-2005
garment structure	— products intended for babies and children under 3 years	EN 1811-1998+A1-2008
	old	For other metals
	50 mg/kg	Detection — GC-ICP-MS
	— all other products including interior textiles	
	100 mg/kg	
	Chrome (Cr) where there is chrome plating	
	60 mg/kg	
	Mercury (Hg)	
	60 mg/kg	
	The following phthalates shall not be used in any plastic	
	accessories:	

(vi) Accessories such as buttons, rivets and zips Applicability: Where incorporated into garment structure	 DEHP (Bis-(2-ethylhexyl)-phthalate) BBP (Butylbenzylphthalate) DBP (Dibutylphthalate) DMEP (Bis2-methoxyethyl) phthalate DIBP (Diisobutylphthalate) DIHP (Di-C6-8-branched alkyphthalates) DHNUP (Di-C7-11-branched alkylphthalates) DHP (Di-n-hexylphthalate) The following phthalates shall not be used in children's clothing where there is a risk that the accessory may be placed in the mouth e.g. zip handles: DINP (Di-isononyl phthalate) DIDP (Di-isodecyl phthalate) DNOP (Di-n-Octyl phthalate) 	Verification: SDS is to be provided for the plastic formulation.
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	No, Appendix 1 is adequate and does not need to be changed
	Yes
	No opinion
	Minor changes should be incorporated
	Other
If nece	essary, please, indicate how Appendix 1 could be changed.
500	character(s) maximum

8.71. Appendix 2. Dye restrictions

Do you think that Appendix 1 should be changed?

Original text of Appendix 2

- Show
- Hide

(a) Carcinogenic aromatic amines

Aryl amine	CAS Number
4-aminodiphenyl	92-67-1
Benzidine	92-87-5
4-chloro-o-toluidine	95-69-2
2-naphtylamine	91-59-8
o-amino-azotoluene	97-56-3
2-amino-4-nitrotoluene	99-55-8
4-chloroaniline	106-47-8
2,4-diaminoanisol	615-05-4
4,4'-diaminodiphenylmethane	101-77-9
3,3'-dichlorobenzidine	91-94-1
3,3'-dimethoxybenzidine	119-90-4
3,3'-dimethylbenzidine	119-93-7
3,3'-dimethyl-4,4'-diaminodiphenylmethane	838-88-0
p-cresidine	120-71-8
4,4'-methylene-bis-(2-chloro-aniline)	101-14-4
4,4'-oxydianiline	101-80-4
4,4'-thiodianiline	139-65-1
o-toluidine	95-53-4
2,4-diaminotoluene	95-80-7
2,4,5-trimethylaniline	137-17-7
4-aminoazobenzene	60-09-3
o-anisidine	90-04-0
2,4-Xylidine	95-68-1
2,6-Xylidine	87-62-7

(b) Indicative list of dyes that may cleave to carcinogenic aromatic amines

Disperse dyes		
Disperse Orange 60		Disperse Yellow 7
Disperse Orange 149		Disperse Yellow 23
Disperse Red 151		Disperse Yellow 56
Disperse Red 221		Disperse Yellow 218
Basic dyes		
Basic Brown 4		D D. 1444
Basic Red 42		Basic Red 114
Basic Red 76		Basic Yellow 82
Basic Red 111		Basic Yellow 103
Acid dyes		'
CI Acid Black 29	CI Acid Red 24	CI Acid Red 128
CI Acid Black 94	CI Acid Red 26	CI Acid Red 115
CI Acid Black 131	CI Acid Red 26:1	CI Acid Red 128
CI Acid Black 132	CI Acid Red 26:2	CI Acid Red 135
CI Acid Black 209	CI Acid Red 35	CI Acid Red 148
CI Acid Black 232	CI Acid Red 48	CI Acid Red 150
CI Acid Brown 415	CI Acid Red 73	CI Acid Red 158
CI Acid Orange 17	CI Acid Red 85	CI Acid Red 167
CI Acid Orange 24	CI Acid Red 104	CI Acid Red 170
CI Acid Orange 45	CI Acid Red 114	CI Acid Red 264
CI Acid Red 4	CI Acid Red 115	CI Acid Red 265
CI Acid Red 5	CI Acid Red 116	CI Acid Red 420
CI Acid Red 8	CI Acid Red 119:1	CI Acid Violet 12
Direct dyes		
Direct Black 4	Basic Brown 4	

Direct Black 29	Direct Brown 6	Direct Red 13
Direct Black 38	Direct Brown 25	Direct Red 17
Direct Black 154	Direct Brown 27	Direct Red 21
Direct Blue 1	Direct Brown 31	Direct Red 24
Direct Blue 2	Direct Brown 33	Direct Red 26
Direct Blue 3	Direct Brown 51	Direct Red 22
Direct Blue 6	Direct Brown 59	Direct Red 28
Direct Blue 8	Direct Brown 74	Direct Red 37
Direct Blue 9	Direct Brown 79	Direct Red 39
Direct Blue 10	Direct Brown 95	Direct Red 44
Direct Blue 14	Direct Brown 101	Direct Red 46
Direct Blue 15	Direct Brown 154	Direct Red 62
Direct Blue 21	Direct Brown 222	Direct Red 67
Direct Blue 22	Direct Brown 223	Direct Red 72
Direct Blue 25	Direct Green 1	Direct Red 126
Direct Blue 35	Direct Green 6	Direct Red 168
Direct Blue 76	Direct Green 8	Direct Red 216
Direct Blue 116	Direct Green 8.1	Direct Red 264
Direct Blue 151	Direct Green 85	Direct Violet 1
Direct Blue 160	Direct Orange 1	Direct Violet 4
Direct Blue 173	Direct Orange 6	Direct Violet 12
Direct Blue 192	Direct Orange 7	Direct Violet 13
Direct Blue 201	Direct Orange 8	Direct Violet 14
Direct Blue 215	Direct Orange 10	Direct Violet 21
Direct Blue 295	Direct Orange 108	Direct Violet 22
Direct Blue 306	Direct Red 1	Direct Yellow 1
Direct Brown 1	Direct Red 2	Direct Yellow 24
Direct Brown 1:2	Direct Red 7	Direct Yellow 48
Direct Brown 2	Direct Red 10	

(c) Dyes that are CMR or which potentially be sensitising

Dyes that are carcinogenic, mutagenic or toxic to reproduction			
C.I. Acid Red 26	C. I. Direct Black 38	C.I. Disperse Blue 1	
C. I. Direct Black 38	C. I. Direct Blue 6	C.I. Disperse Orange 11	
C.I. Disperse Blue 1	C. I. Direct Red 28	C. I. Disperse Yellow 3	
C.I. Disperse Blue 1	C.I. Disperse Blue 124	C.I. Disperse Red 11	
C.I. Disperse Blue 3	C.I. Disperse Brown 1	C.I. Disperse Red 17	
C.I. Disperse Blue 7	C.I. Disperse Orange 1	C.I. Disperse Yellow 1	
C.I. Disperse Blue 26	C.I. Disperse Orange 3	C.I. Disperse Yellow 3	
C.I. Disperse Blue 35	C.I. Disperse Orange 37	C.I. Disperse Yellow 9	
C.I. Disperse Blue 102	C.I. Disperse Orange 76	C.I. Disperse Yellow 39	
C.I. Disperse Blue 106	C.I. Disperse Red 1	C.I. Disperse Yellow 49	

8.72. Appendix 3. Best available techniques in the field of washing, drying and curing energy efficiency Original text of Appendix 3

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Do you think that Appendix 2 should be changed?

Hide

	Domain	BAT Techniques		
1	General energy management	 1.1 Sub-metering, 1.2 Process monitoring and automatic control systems for flow control, filling volumes, temperatures and timing; 1.3 Insulation of pipework, valves and flanges 1.4 Frequency controlled electric motors and pumps 1.5 Closed design of machines to reduce vapour loss 1.6 Water and liquor re-use/recycling in batch processes 1.7 Heat recovery e.g. rinse water, steam condensate, process exhaust air, combustion gases 		
2	Washing and rinsing process	2.1 Use of cooling water as process water 2.2 Replacement of overflow washing with drainage/inflow washing 2.3 Use of 'smart' rinsing technologies with water flow controls and counter currents 2.4 Installation of heat exchangers		
3	Drying and curing using stenter frames	3.1 Optimisation of air flow 3.2 Insulation of enclosures 3.3 Installation of Efficient burner systems 3.4 Installation of heat recovery systems		
	Note: New BAT techniques referenced and recommended by EU Member State authorities after the date of publication of the European Commission's textile BREF (2003) shall be considered complementary to those listed above.			

Do you think that Appendix 3 should be changed?

No, Appendix 3 is adequate and does not need to be change		No, Appendix 3 is	adequate and	does not ne	ed to be change
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Yes

No opinion

Minor changes should be incorporatedOther
If necessary, please indicate how Appendix 3 could be changed. 500 character(s) maximum
Section including questions on EU Green Public Procurement
This section contains 3 questions
* 9.0. Contribution to Section "9. EU GPP". Do you want to contribute to Section "9. EU GPP"? Yes No 9. EU Green Public Procurements (GPP)
9.1. GPP schemes with criteria on textile products and services Are you aware of national/regional/local GPP criteria for textile products and services in EU Member States or third countries? Yes No
9.1.1. Specific Member State or third country. In 9.1., you declared that you are aware of national, regional and/or local GPP schemes on textile products in EU Member States or Third Countries.
Please specify which: Austria Germany Poland Belgium Greece Portugal Bulgaria Hungary Romania Croatia Ireland Slovakia Cyprus Italy Slovenia Czechia Latvia Spain Denmark Lithuania Sweden Estonia Luxemburg Third country Finland Malta France Netherlands

9.1.2. References

In 9.1., you declared that you are aware of national, regional and/or local GPP schemes on textile products in EU Member States or third countries.

Please provide references to legal and technical documents referring to the national GPP schemes on
textile products. References could be in the form of links to webpages or you can send files to JRC-B5-TEXTILES@ec.
europa.eu
500 character(s) maximum
9.2. EU GPP criteria used by Member States We would like to understand how successful the current EU GPP criteria for textile products and services (S WD(2017) 231 final) have been. Do you think it is possible to find information on how much Member States (including regional and local authorities within them) have used these criteria? Yes No No opinion
9.2.1. Specify the source of information Please provide references to documents containing figures and information on how Member States (including regional and local authorities within them) have used the current EU GPP criteria for textile products and services. References could be in the form of links to webpages or you can send files to JRC-B5-TEXTILES@ec. europa.eu 500 character(s) maximum
9.2.2. Specify the reason Please explain why it is not possible to find information on how much Member States (including regional and local authorities within them) have used the current EU GPP criteria for textile products and services. 500 character(s) maximum
9.3. Lessons learnt from voluntary EU GPP criteria The EU Textile Strategy foresees the adoption of mandatory EU GPP criteria. What lessons can be learnt from the current experience with voluntary EU GPP criteria (SWD(2017) 231 final)? Which aspects would it be important to consider if one were to develop mandatory EU GPP criteria? 500 character(s) maximum
Section on representative products not included in PEFCR

This section contains 7 questions.

Six questions aim to gather useful information to determine the representative products of categories included in the scope of the preparatory study, but not included in the PEFCR project. Product categories are:

- Bed linens
- Kitchen textiles
- Towels and bathrobes
- Textile cleaning products
- Reusable absorbent hygiene products

The last question concerns industry availability to visit specific sites. The JRC will use these visits to learn more about the processes.

Do you want to contribute to Section	"10. Representative products	not included in PEFCR"?
--------------------------------------	------------------------------	-------------------------

Yes

O No

10. Additional questions for Industry and Industry association

Representative products

In this section we gather information to determine the representative product of the product categories not included in the <u>PEFCR</u> project and included in the proposed scope of the preparatory study.

The table below reports the products and product categories included in the scope of the preparatory study. We would like your contribution for categories 10 to 14.

List of Products included in the scope

ID	Product category included in section 4	Products included
10	Bed linens	Bed sheets, pillowcases, duvet/blanket cover
11	Kitchen textiles	Tablecloths, kitchen tea towels, napkins, aprons
12	Towels and bathrobes	Towels and bathrobes
13	Textile cleaning products	Floor-cloths, dishcloths, dusters and similar cleaning cloths
14	Reusable absorbent hygiene product	Menstrual pads and diapers

To be consistent with the ongoing work on the relevant PEFCR, the following definitions shall apply:

- a 'use' is defined as on day, regardless of how many hours the textile product is used within this day (including or excluding a washing step)
- 'shares' is defined as the market split representative of this product category, calculated based on product volumes.

10.1. Bed linens

Could you provide information about the category bed linens?

- Yes
- No Cannot disclose
- No Do not have

10.1.1. Share in the product category bed linens

What would be your estimation of the '% shares' of the following products?

	Bed sheets	Pillowcases	Duvet/blanket cover	Other	Total
% shares in the category bed linens	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed

If you have answered 'Other', please specify the product.			
50	character(s) maximum		

10.1.2. Average weight in the product category bed linens

What would be your estimation of the 'average weight' of the following products (in grams)?

	Bed sheets	Pillowcases	Duvet/blanket cover	Other
Average weight in the category bed linens (in				
grams)				

If yo	ou have answered 'Other', please specify the product.					
50	50 character(s) maximum					

10.1.3. Number of uses in a lifetime

What would be your estimation about the 'number of uses in a lifetime' of the following products?

	Bed sheets	Pillowcases	Duvet/blanket cover	Other	
Number of uses					

If yo	ou have answered 'Other', please specify the product.					
50	50 character(s) maximum					

10.1.4. Material composition

Could you specify the typical material composition of the following products (including any recycled material)?

For example: Cotton 50%, polyester 40%, recycled cotton 10%

	Bed sheets	Pillowcases	Duvet/blanket cover	Other			
Material composition %	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed			

IT y	ou have answered "Other", please specify the product					
50	50 character(s) maximum					

10.1.5. Product recyclability

	Bed sheets	Pillowcases	Duvet/blanket cover	Other		
Can this product be recycled?	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know		

If yo	ou have answered 'Other', please specify the product.						
50	50 character(s) maximum						

10.1.6. Manufacturing process steps

Could you select the steps of the manufacturing process are used in the production of these products?

	Bed s	sheets	Pillov	vcases	Duve	t/blanket cover	Other	r
The steps of the manufacturing process		Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process		Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process		Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process		Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process
If you have answered 'Other process' or have any other comments, please specify	500	character(s) maximum	500	character(s) maximum	500	character(s) maximum	500	character(s) maximum

10.2. Kitchen textiles

Could you provide information about the category kitchen textiles?

- Yes
- No Cannot disclose
- No Do not have

10.2.1. Share in the product category kitchen textiles

What would be your estimation of the '% shares' of the following products?

	Tablecloths	Kitchen tea towels	Napkins	Aprons	Other	Total
% shares in the category kitchen textiles	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed

If yo	If you have answered 'Other', please specify the product.				
50	character(s) maximum				

10.2.2. Average weight in the product category kitchen textiles

What would be your estimation of the 'average weight' of the following products (in grams)?

	Tablecloths	Kitchen tea towels	Napkins	Aprons	Other
Average weight in the category kitchen textiles (in grams)					

If yo	ou have answered 'Other', please specify the product.						
50	50 character(s) maximum						

10.2.3. Number of uses in a lifetime

What would be your estimation of the 'number of uses in a lifetime' of the following products?

	Tablecloths	Kitchen tea towels	Napkins	Aprons	Other
Number of uses					

If you have answered 'Other', please specify the product.		
50	Character(s) maximum	

10.2.4. Material composition

Could you specify the material composition of the following products (including any recycled material)?

For example: Cotton 50%, polyester 40%, recycled cotton 10%

	Tablecloths	Kitchen tea towels	Napkins	Aprons	Other
Material composition %	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed

If you have answered 'Other', please specify the product.		
50	character(s) maximum	

10.2.5. Product recyclability

Can this product be recycled?

	Tablecloths	Kitchen tea towels	Napkins	Aprons	Other
Can this product be recycled?	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know

If yo	ou have answered 'Other', please specify the product.
50	Character(s) maximum

10.2.6. Manufacturing process steps

Could you select the steps of the manufacturing process that are used in the production of these products?

	Tablecloths	Kitchen tea towels	Napkins	Aprons	Other
The steps of the manufacturing process	Spinning Bleaching Pre-Treatment Finishing Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process
If you have answered 'Other process' or for any other comments, please specify	500 character(s) maximum	500 character(s) maximum	500 character(s) maximum	500 character(s) maximum	500 character(s) maximum

10.3. Towels and bathrobes

Could you provide information about the category towels and bathrobes?

- Yes
- No Cannot disclose
- No Do not have

10.3.1. Share in the product category towels and bathrobes

What would be your estimation of the '% shares' of the following products?

	Towels	Bathrobes	Other	Total
% shares in the category towels and bathrobes	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed

If you have answered 'Other', please specify the product.	
50 character(s) maximum	

10.3.2. Average weight in the product category towel and bathrobes

What would be your estimation of the 'average weight' of the following products (in grams)?

	Towels	Bathrobes	Other
Average weight in the category towels			
and bathrobes (in grams)			

If yo	ou have answered 'Other', please specify the product.
50	Character(s) maximum

10.3.3. Number of uses in a lifetime

What would be your estimation of the 'number of uses in a lifetime' of the following products?

	Towels	Bathrobes	Other
Number of uses			

If you have answered 'Other', please specify the pr	oduct.
50 character(s) maximum	

10.3.4. Material composition

Could you specify the material composition of the following products (including any recycled material)?

For example: Cotton 50%, polyester 40%, recycled cotton 10%

	Towels	Bathrobes	Other
Material composition %	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed

If yo	ou have answered 'Other', please specify the product.
50	character(s) maximum

10.3.5. Product recyclability

Can this product be recycled?

	Towels	Bathrobes	Other	
Can this product be recycled?	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	

If y	f you have answered 'Other', please specify the product.				
5	50 character(s) maximum				

10.3.6. Manufacturing process step

Could you select the steps of the manufacturing process that are used in the production of these products?

	Towels	Bathrobes	Other
The steps of the manufacturing process	Spinning Bleaching Pre-Treatment Finishing Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process
If you have answered 'Other process' or have any other comments, please specify	500 character(s) maximum	500 character(s) maximum	500 character(s) maximum

10.4. Textile cleaning products

Could you provide information about the category textile cleaning products?

- Yes
- No Cannot disclose
- No Do not have

10.4.1. Share in the product category textile cleaning products

What would be your estimation of the '% shares' of the following products?

	Floor-cloths	Dish-cloths	Dusters	Other	Total
% shares in the category textile cleaning products		Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed

If yo	If you have answered 'Other', please specify the product.				
50	50 character(s) maximum				

10.4.2. Average weight in the product category of textile cleaning products

What would be your estimation about the 'average weight' of the following products (in grams)?

	Floor-cloths	Dish-cloths	Dusters	Other
Average weight in the category of textile cleaning				
products (in grams)				

IT y	ou answered. Other, please specify the product
5	0 character(s) maximum

10.4.3. Number of uses in a lifetime

What would be your estimation of the 'number of uses in a lifetime' of the following products?

	Floor-cloths	Dish-cloths	Dusters	Other
Number of uses				

If y	f you have answered 'Other', please specify the product.				
5	50 character(s) maximum				

10.4.4. Material composition

Could you specify the material composition of the following products (including any recycled material)?

For example: Cotton 50%, polyester 40%, recycled cotton 10%

	Floor-cloths	Dish-cloths	Dusters	Other
Material composition %	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed

If y	f you have answered 'Other', please specify the product.				
5	50 character(s) maximum				

10.4.5. Product recyclability

Can this product be recycled?

	Floor-cloths	Dish-cloths	Dusters	Other
Can this product be recycled?	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know

f you have answered 'Other', please specify the product.		
50 character(s) maximum		

10.4.6. Manufacturing process step

Could you select the steps of the manufacturing process that are used in the production of these products?

	Floor-cloths	Dish-cloths	Dusters	Other
The steps of the manufacturing process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process
If you have answered 'Other process' or for any other comments, please specify	500 character(s) maximum	500 character(s) maximum	500 character(s) maximum	500 character(s) maximum

10.5. Reusable absorbent hygiene product

Could you provide information about the category reusable absorbent hygiene products?

- Yes
- No Cannot disclose
- No Do not have

10.5.1. Share in the product category of reusable absorbent hygiene product

What would be your estimation about the '% shares' of the following products?

	Menstrual pads	Diapers	Other	Total
% shares in the category of reusable absorbent hygiene product	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed

If you answered 'Other', please specify the product	
50 character(s) maximum	

10.5.2. Average weight

What would be your estimation about the 'average weight' of the following products (in grams)?

	Menstrual pads	Diapers	Other
Average weight in the category of of reusable absorbent hygiene product (in grams)			

If you answered 'Other', please specify the product	
50 character(s) maximum	

10.5.3. Number of uses in a lifetime

What would be your estimation about the 'number of uses in a lifetime' of the following products?

	Menstrual pads	Diapers	Other
Number of uses			

If you answered 'Other', please specify the product	
50 character(s) maximum	

10.5.4. Material composition

Could you specify the material composition of the following products (including any recycled material)?

For example: Cotton 50%, polyester 40%, Recycled Cotton 10%

	Menstrual pads	Diapers	Other
Material composition %	Only values of at most 100 are allowed	Only values of at most 100 are allowed	Only values of at most 100 are allowed

If you answered 'Other', please specify the product	
50 character(s) maximum	

10.5.5. Product recyclability

Can this product be recycled?

	Menstrual pads	Diapers	Other
Can this product be recycled?	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know	No Yes, fibre to fibre Yes, filling material Yes, wipers/rags Yes, other application I do not know

IT y	ou answered. Other, please specify the product
5	0 character(s) maximum

10.5.6. Manufacturing processes

Could you select the steps of the manufacturing process are used in the production of these products?

	Menstrual pads	Diapers	Other
The steps of the manufacturing process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process	Spinning Bleaching Pre-Treatment Finishing Twisting Weaving Printing Wet Treatment Texturising Knitting Coating Dry Treatment Dyeing Sizing Tufting Assembly (Sewing) Other process
If you have answered 'Other process' or have any other comments, please specify	500 character(s) maximum	500 character(s) maximum	500 character(s) maximum

10.6. Additional information

Are you interested in collaborating more closely with the JRC to agree on representative products of the following categories?

- Bed linens
- Kitchen textiles
- Towels and bathrobes
- Textile cleaning products
- Reusable absorbent hygiene products

If you answer yes, you will be contacted for further collaboration. Yes No
Please, include your email address:
10.7. Availability for site visitWould you open the doors of your company to help develop the preparatory study?If yes, please provide information on the following:
Location of the site:
500 character(s) maximum
Types of activities carried out at the site (design, production, recycling etc.): 500 character(s) maximum
Other:
500 character(s) maximum