

Comments to the 1st milestone of the preparatory study on textile products and answers from the JRC

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Joint Research Centre

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1 Introduction

This document is part of the development of the preparatory study on textiles for product policy instruments ⁽¹⁾ (PS). In particular, the PS aims to provide a basis on which the European Commission can consider the development of ecodesign requirements, green public procurement criteria and revised EU Ecolabel criteria for textile products.

The development of the PS includes the direct involvement of stakeholders following the principles of the Sevilla process ⁽²⁾, which enables the Joint Research Centre (JRC) of the European Commission to verify with stakeholders the work under development and collect additional evidence on the investigated topics.

In 2024, the 1st milestone of the PS included the following steps:

- On 23 February, the JRC made available to the public the working document about the 1st milestone ⁽³⁾;
- On 18 and 19 March, the JRC held the online meeting with registered stakeholders on the 1st milestone of the PS. The slides presented at the meeting were made available on the project's website:
 - Presentation given by DG Environment on 18 March ⁽⁴⁾;
 - Presentation given by JRC on 18 March ⁽⁵⁾;
 - Presentation given by JRC on 19 March ⁽⁶⁾;
- From 20 March to 22 April, registered stakeholders provided their comments to the working document via a web form.

This document reports all comments provided by registered stakeholders to the working document about the 1st milestone and corresponding answer from the JRC.

The JRC thanks all stakeholders that provided comments to the working document. The contribution from stakeholders allowed the improvement of the 1st milestone of the PS.

Section 2 of this document reports the questions asked by the JRC to the stakeholders and some suggestions when providing comments. The following sections of this document follow the structure

¹ Project website available at [this link](#). Last accessed on 16 December 2023.

² With the 'Sevilla process', the Joint Research Centre of the European Commission works together with scientists, industry, non-governmental organisations (NGOs), national authorities and international institutions to take decisions that are underpinned by solid scientific and technical data, and that are based on consensus and transparency. The process is clearly structured within the framework of the Industrial Emissions Directive (2010/75/EU), and it is legally defined in Commission Implementing Decision 2012/119/EU available at [this link](#). More information is available at [this link](#). The process in the preparatory study on textiles is not legally defined, but it will follow the principles of the "Sevilla process".

³ Working document – 1st milestone. Preparatory study on textiles for product policy instruments – 1st milestone. Available at [this link](#). Last accessed on 16 December 2024.

⁴ Presentation given by DG Environment on 18 March. Available at [this link](#). Last accessed on 16 December 2024.

⁵ Presentation given by JRC on 18 March. Available at [this link](#). Last accessed on 16 December 2024.

⁶ Presentation given by JRC on 19 March. Available at [this link](#). Last accessed on 16 December 2024.

of the working document about the 1st milestone and report comments by stakeholders and corresponding answers provided by the JRC.

The submitted comments were not modified by the JRC, with exception of removal of words that could reveal the identity of the stakeholder submitting the comment. Squared brackets with ellipsis “[...]” was reported instead of the name of the stakeholder.

2 The online meeting

During the online meetings held on 18 and 19 March 2024, the JRC asked **specific questions** to the stakeholders. This section lists these questions.

Questions regarding the section on the **scope**:

1. Do you agree with definitions provided for textile product, apparel textiles and technical textiles? Why?
2. Is there additional evidence to enrich the literature used for the selection criteria? Which are they?
3. Do you think that an initial Delegated Act on apparel textiles could disrupt the supply chain if requirements are not set at the same time also for home/interior textiles and other sub-groups of this product group? Why?
4. Is there a definition for each product category? Is the current description enough? Why?
5. Do you agree with the approach used for workwear and sportswear? Why?
6. Do you think that the scope is correctly defined? How can it be better described?
7. Do you agree with the exclusion of intermediate products? Why?

Questions regarding the **standards and environmental labels**:

1. Are there very commonly used standards that are not included in the list? Which are they?
2. Are there standards which could be helpful in the development of the PS that were not included in the list? Which are they?
3. Is there a standard capable of measuring the composition of mechanically recycled fibres?
4. Are there further studies analysing the environmental labels used in the textile industry? Which are they?

Questions regarding the **first part of the market analysis**:

1. Do you agree with the current interpretation of the relationship between the reported historical events and the evolution over time of the market indicators?
2. In the last years, the apparent consumption of most of the apparel textile categories increased. Can you explain the different trend of the categories 7 and 8 in Table 13?
3. Do you know what is the composition of products included in each category? E.g. 1. T-shirts: 30% made of only cotton, 60% made of polycotton (70% polyester and 30% cotton), 10% made of wool blend (60% wool and 40% polyamide).
4. Can you share a detailed taxonomy of chemicals used in the apparel textile sector with corresponding market data?

5. Where can we find the price of water used at industrial scale for producing countries?
6. Do you have any suggestion and data to improve the market analysis of fibres, chemicals, energy and water?

Questions regarding the **second part of the market analysis**:

1. Are there figures about the market share of companies applying specific business models?
2. Are there EU figures about second hand, rental market and e-commerce?
3. Are there BREF for Bangladesh, Türkiye, Pakistan and Vietnam? Can you provide the references of legislation affecting the textile industry in these countries? Are there any studies about them?
4. Can you share information about studies focussing on lifespan? Dated and recent studies are relevant.
5. Can you share information about figures on market penetration of environmental labels?

Questions regarding the **user behaviour**:

1. Are you aware of studies/surveys estimating the apparel purchase frequency in different Member States?
2. Are there additional evidence/surveys to enrich the literature used related to the user perception of chemicals present in apparel? Which are they?
3. Are there additional evidence/surveys to enrich the literature used related to the user perception of apparel made with recycled materials? Which are they?
4. Are there additional evidence/surveys related to users' attention to labels in general? Which are they?
5. Where can we find studies/surveys on the way users dose detergents/softeners, store the apparel after washing and how these practices may affect the apparel qualities?
6. Are you aware of studies/surveys analyzing the apparel conditions upon collection from general waste and/or second-hand shops? Which are they?
7. Are you aware of product design strategies to promote user's emotional attachment to apparel?
8. Are you aware of User Behaviour studies/surveys focused on specific apparel textile categories?

A question regarding the revision of **current EU Ecolabel criteria**:

Which are your views on the revision of EU Ecolabel criteria in light of the new Ecodesign framework?

A question regarding **public procurement and current EU GPP criteria**:

Do you agree with the analysis performed on public procurement? Why?

During the meeting, the JRC underlined that a position reported in a comment should be supported by reasoning and evidence. The JRC stressed that the number of contributions stating the same position do not influence the final decision of the JRC.

With the aim of streamline the process, the JRC encouraged stakeholders to team up and send well-argued aggregated comments, and invited companies to provide comments via their associations.

3 General comments

Table 1. Comments referring to the preparatory study in general

ID	Stated section; stated line	Comment	Answer
1	Several; Several	See references sent via email	<p>Acknowledged</p> <p>The list of references were well received and implemented to the comments. JRC reports below some references that were shared without specifying the section or line to refer to.</p> <p>Are second-hand shell jackets better than users think? A comparison of perceived, assessed and measured functionality throughout lifespans - ScienceDirect</p> <p>Design for recycling of products containing plastics (diva-portal.org)</p> <p>G.-Peters.-LCA-on-Blended-Fabrics.-Mistra-future-fashion-report.pdf (mistrافuturefashion.com)</p> <p>T.-Joanes.-think-twice-social-marketing-for-reduced-consumption.-mistra-future-fashion-report-2019.12.pdf (mistrافuturefashion.com)</p> <p>Roos D2.1.1.1.indd (mistrافuturefashion.com)</p> <p>Sandin D2.12.1, Final Layout.indd (mistrافuturefashion.com)</p>

ID	Stated section; stated line	Comment	Answer
			<p>Mistra Future Fashion Report, 3.1.2.1.indd</p> <p>Preferred Fiber and Materials Market Report 2022 - Textile Exchange</p> <p>Does large-scale textile recycling in Europe reduce climate impact? (diva-portal.org)</p>
2	general; general	<p>Firstly, I would like to thank JRC for opening up the dialogue with stakeholders for feedback and answering very honestly some difficult questions during the two-day session online. As I was called on to ask “my” questions both days, and I am not able to deliver my feedback in the online format ([...] cell-phone numbers lack one digit in order to get the code to get a password), I am therefore using the second option offered: To send additional documents via email.</p> <p>I have earlier contributed with feedback, as part of a group and research project (Fletcher et al., 2023), and I am concerned that the insights previously delivered not have been considered properly in this preparatory study. I may be wrong, but when reading the preparatory study, I am struck by how the document is an attempt to make the landscape adhere to the map (EU’s Textile strategy) and not the opposite: make reality dictate what policy strives to fix. During the two-day online sessions several of us felt very much that JRC have had their hands tied and thus have only included references and research that serves a predetermined strategy; rather than adjusting policy to the knowledge that exists. JRC said as much during the two-day sessions: Lack of data has forced them to make some assumptions. The question remains if these assumptions are actually right, or in line with knowledge that is available.</p> <p>One thing JRC asked for, was research to guide on how lifespan relates to durability, and also if recycling is viable as an industry in Europe; I will answer both below, as promised in the on-line sessions by me to you. I have kept my word, and I hope this knowledge will be taken seriously.</p> <p>Firstly, I would like to offer some overall comments, because even though JRC did say that you talk to others, not ‘siloin’, I believe this is true only to a certain degree. Textiles are deeply rooted in Europe’s history and culture. They are part of our daily lives and our identities as indigenous people and/or nations. In dealing with the great and frightening environmental challenges, we must not forget that the production and</p>	<p>Acknowledged.</p> <p>This is only the 1st milestone of the PS. Many aspects mentioned by the stakeholder will be addressed in the following milestones.</p>

ID	Stated section; stated line	Comment	Answer
		<p>consumption of textiles is also part of what we want to protect and safe-guard. Production of textile raw materials can also have an important positive impact on the climate and, through for example grazing, also hinder bio-diversity loss (Klepp & Tobiasson, 2022). Local production, home production and textile craft traditions are important in people's lives and in making the textile ecosystem more robust and diverse. In Norway, our Crown Princess recently arranged a weaving symposium that was full of artisans and practitioners, and set the scene for recruiting the younger generation into crafts and small-scale industry. Several measures have been initiated to utilize more of EU's own wool, where approximately 80% is not utilized today (Klepp & Tobiasson, 2022) and the same day that the Crown Princess had her symposium, we were visited by Portuguese Rosa Pomar, who on her own, has spearheaded a revival of the use of Portuguese indigenous sheep breeds in knitting wool. The positive contribution that small-scale and local businesses contribute - and could contribute - must be taken seriously, and it must be ensured that regulations do not hinder this.</p> <p>The document has little focus on these more positive aspects of textile production and consumption. It is particularly problematic because several of the possible measures will affect small and vulnerable businesses, and not least the cultural preservation safeguarded by voluntary organizations. It can be anything from requirements for documentation (which is often expensive and difficult for small businesses), requirements for recycled content, or rules against the use of traditional materials such as fur (which does not have to originate in farmed furs, rather from hunting or herding). The textile field has a lot to learn from food, where culture and tradition – under the headline of healthy and good food – have been used more in the promotion of alternatives to mass-produced global, industrial products. Alternatives are also needed when working with textiles. These are absent from the preparatory study document (except a mention of local at the very end in Table 65) - and unfortunately as far as I know - from EU's Textile Strategy in general.</p> <p>By aligning with the New European Bauhaus and the EU Soil Mission, this could, however, be brought forward. Every time I bring this up in EU meetings, there is a general embarrassment that these are not seen as related.</p> <p>Which then brings me to the first ask JRC had of me. The Swedish IVL paper, which you had clearly not heard of, states: "Peters and colleagues conclude that this is within the range estimated by other studies of these sectors (from 0.3 to 4 billion t CO2 eq.) conclude that for Sweden, clothing contributes to about 3% of the consumption-based</p>	

ID	Stated section; stated line	Comment	Answer
		<p>carbon footprint, or 327 kg CO2 eq. per capita per year. In the present report, we consider not only recycling of clothing textiles, but also home textiles and potentially other textiles. Let us assume the textile consumption in the EU is responsible for 3% of our consumption-based carbon footprint. And let us consider that the per-capita consumption-based carbon footprint in the EU is 7 t CO2 equivalents per year (Our World in Data 2023) and the population of the EU is 448.4 million (Eurostat 2023c) (which results in an annual carbon consumption based carbon footprint of about 3.2 billion t CO2 eq. for the EU). Then the annual climate impact of textile products purchased in the EU is about 94 million t CO2 eq. This means that the above estimated climate-impact reduction of large-scale textile to-textile recycling, of on average 1.2 million t CO2 eq., corresponds to a 1.3% reduction of the climate impact of textile products purchased in the EU. We consider this to be a relatively small contribution to the reduction needed for the carbon footprint of textile products.” (Sandin Albertsson, G., Lidfeldt, M., Nellström, M., Strandberg, J., Billstein, T., Hammar, T., & Larsson, M., 2024).</p> <p>When JRC’s own research, in addition, says that only 11% of consumers actually want recycled content in their apparel or footwear, why is the EU so set on this? Consumers actually prefer natural fibers and consider them to be sustainable (Sigaard, A. S., & Laitala, K., 2023). A conversation with a person from Euratex enlightened me. According to him, it was a fluke that EU had decided that recycling should be a major push. Without any data to underpin this, no reasoning, it just happened, so if my Euratex source is right, this is very disturbing. Is this indicative of the several “assumptions” being made?</p> <p>The main issue for ESPR is that this addresses problems at the product level, when the “problem” is not at a product level, but at a systemic level. As long as there is massive over-production with sophisticated marketing, a constant influx of new products, there is no possibility to “use up” products, there is no incentive to repair, and there is no need or incentive or recycled content, we have a system that has hijacked ecodesign per se, when ecodesign can only work outside a system of perpetual growth, not within. A system of scarcity would work, yes, but what we have is a system of abundance. In the current system, the constant influx of new stuff will kill any ESPR effect.</p> <p>This said, there is the last ask from JRC that I would like to address. The functional unit, measuring the use phase and addressing “durability” – or rather Duration of Service. The background paper discusses this at length, but here again, definitions and assumptions wrongly reign and confuse. But, behold, the problem is solved:</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Two of the researchers you cite have just now developed a new method to capture your ask! Not to measure “emotional” durability (bad wording) but to capture the intrinsic quality or Duration of Service of apparel (Laitala & Klepp, 2024). This can be done now and very quickly ensure a level playing field that captures the actual life span and DoS. And that then can be translated to ecodesign in a meaningful way. No “forced assumptions”, just data and facts that underpin good policy decisions. Only one third of apparel goes out of use because it is used up (Klepp & Laitala, 2022), so it is time to accept that durability, repairability, recyclability and a demand for recycled content is a dead end. Unless you forbid on a massive level, imports to the EU based on synthetic content or other ecodesign measures, that are much easier to implement.</p> <p>References:</p> <p>Fletcher, K., Maldini, I., Klepp, I. G., Laitala, K., Måge, J., & Tobiasson, T. S. (2023). Ecodesign position paper: Textiles and footwear. In: Clothing Research.</p> <p>Laitala, K. & Klepp, I.G. (2024). Waste audit interviews – A method for understanding the link between intrinsic quality and apparel lifespans. Consumption Research Norway (SIFO), Oslo Metropolitan University. https://clothingresearch.oslomet.no/wpcontent/uploads/sites/1026/2024/04/NewMethod.pdf</p> <p>Laitala, K., & Klepp, I. G. (2022). Review of clothing disposal reasons. Retrieved from https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/</p> <p>Klepp, I. G., & Tobiasson, T. (2022). Local, Slow and Sustainable Fashion Fibres: Wool as a fabric for change. Cham, Switzerland: Palgrave MacMillan.</p> <p>Sandin Albertsson, G., Lidfeldt, M., Nellström, M., Strandberg, J., Billstein, T., Hammar, T., & Larsson, M. (2024). Life cycle assessment of mechanical textile recycling in Sweden. https://ivl.diva-portal.org/smash/get/diva2:1833833/FULLTEXT01.pdf</p> <p>Sigaard, A. S., & Laitala, K. (2023). Natural and sustainable? Consumers' textile fiber preferences. <i>Fibers</i>, 11(2). doi:10.3390/fib11020012</p>	
3	General; General	<p>We suggest that the commission conduct an investigation into the additional costs of using recycled materials as an alternative to virgin. We suggest that the study should look at additional costs both for the use of mechanically and chemically recycled material.</p>	<p>Acknowledged. As described in the Introduction, the environmental and the economic assessment will be addressed in Tasks 5 and 6 of the MEERp. The following milestones will</p>

ID	Stated section; stated line	Comment	Answer
			analyse environmental and economic aspects related to the use of recycled materials.
4	Foreword; 115	I would like to congratulate the authors, JRC, DG ENV, DG GROW for this extraordinary, well organized, complete, concise, pleasant to read draft report.	Acknowledged.

4 Comments on section 1 – Introduction

Table 2. Comments on section 1 – Introduction

ID	Stated section; stated line	Comment	Answer
5	1 Introduction; 142-145	<p>To achieve sustainability, products must serve a purpose; their sheer abundance poses the real challenge rather than the products themselves. Circular practices demand a reduction in the quantity of goods to encourage extended use, repair, and reuse. Textile and fashion regulation should prioritize minimizing both direct and indirect impacts on production and consumption levels. This can be achieved by targeting sectors with the highest growth rates, addressing root causes like the fast fashion model, and enhancing transparency around product lifespan through new research like wardrobe studies and practices such as dating products upon market entry.</p> <p>Reference:</p> <p>Fletcher et al., Ecodesign position paper: Textiles and footwear, May 2023, SIFO, https://clothingresearch.oslomet.no/2023/05/14/ecodesign-position-paper-textiles-and-footwear/</p>	<p>Acknowledged.</p> <p>The PS is also addressing the influence of the quantity of products placed on the market. The section 5.2 and Figure 7A provide important data that wil be used in Task 7 of the MEErP on policy scenarios.</p> <p>Nevertheless, the ESPR does not allow to limit the number of products placed on the market.</p>
6	1. Introduction; 142-145	<p>Products cannot become “sustainable” when there is no use for them. It is not the products themselves that are the problem, but the quantity of them. Circularity must be ensured through fewer products so that they can be used more and so that there is a point in repairing them, reusing them, etc. The most important thing that all regulations of apparel must consider, is how the regulation will affect the number and quantity (as imported/produced) both directly and indirectly. This can be done through measures that are aimed at what is growing the fastest, or what is the cause of the growth (the fast fashion business model), or by giving consumers, researchers and authorities access to knowledge about the lifespan of clothing (dating products when they enter the market), what is generally known as Duration of Service.</p> <p>Reference:</p>	<p>Acknowledged.</p> <p>The PS is also addressing the influence of the quantity of products placed on the market. The section 5.2 and Figure 7A provide important data that wil be used in Task 7 of the MEErP on policy scenarios.</p> <p>Nevertheless, the ESPR does not allow to limit the number of products placed on the market.</p>

ID	Stated section; stated line	Comment	Answer
		Fletcher et al., Ecodesign position paper: Textiles and footwear, May 2023, SIFO, https://clothingresearch.oslomet.no/ESPR-position-paper	
7	1 and 2; line 142; line 285	What definition of sustainability does the EC use. Please can you insert it on the definition page. As it reads that you only cover environmental criteria and not the social aspects sustainable aspects in the ecodesign. An ecodesign without the 9 points of the OECD covered during the production of the product is a failure and does not contribute to a solid supply chain	<p>Clarified.</p> <p>The ESPR aims to improve the <i>environmental</i> sustainability of products. It cannot set requirements on social aspects of product sustainability. The impacts assessment underpinning the ecodesign requirements will however take a holistic view in line with the Better Regulation Guidelines, and will include an assessment of possible social impacts of requirements. While the ESPR does not include a definition for sustainability, this is underpinned by the product aspects listed under Article 5 of the Regulation.</p> <p>Other legislations in EU address social sustainability. On 25 July 2024, the Directive on corporate sustainability due diligence (Directive 2024/1760) entered into force. The aim of this Directive is to foster sustainable and responsible corporate behaviour in companies' operations and across their global value chains. The new rules will ensure that companies in scope identify and address adverse human rights and environmental impacts of their actions inside and outside Europe.</p>
8	Section 1; 164-166	While the aspects mentioned in these rows are important parts of the EU Textile Strategy, we believe it is important to mention them all: "By 2030 textile products placed on the EU market are long-lived and recyclable, to a great extent made of recycled fibres, free of hazardous substances and produced in respect of social rights and the environment." Ecodesign requirements should not just focus on making products more durable – which is very relevant – but also address the negative environmental impact of textile production by setting specific requirements on the production processes themselves. The EU Ecolabel criteria and the Best Available Techniques (BAT) Reference Document (BREF) for the Textiles Industry could, for	<p>Acknowledged.</p> <p>The analysis performed in the PS is addressing all product aspects reported in the Article 5 of the ESPR. This analysis includes environmental impacts in the manufacturing phase, the use of substances of concern, and the assessment of the recycled content.</p>

ID	Stated section; stated line	Comment	Answer
		<p>instance, be used as a reference document for setting mandatory requirements on production processes. On chemicals, we understand that the focus of the ESPR should not overlap with REACH. However, the final ESPR compromise clearly states that “the establishment of performance requirements shall also where appropriate, reduce significant risks to human health or the environment”. Hence we believe that performance requirements on chemicals should not just focus on ensuring that a product can be recycled, but should also focus on reducing risks to health or the environment by limiting chemical use in the production process and on the final product.</p> <p>We also call on the JRC to ensure the relevancy of recycled content is properly considered. Currently, just over 0.78 Mt of the 2.44 Mt of textiles which are collected in the EU are sent to recycling operations every year – according to data presented in the JRC’s own 2023 report ‘Techno-scientific assessment of the management options for used and waste textiles in the European Union’. Even with a projected increase in textile waste recycling capacity by 2035 to 1.3 Mt, if much of the 8 Mt of post-consumer textile waste which is currently sent to landfill or incineration is separately collected and sorted, it is a pipe dream to imagine that it can all be recycled into spinnable fibres, let alone that the EU would have enough spinning capacity.</p> <p>We urge the JRC to ensure attention is placed on reducing output in the sector rather than with a narrow focus on increasing the amount of recycled content in textile products for arguably small gains. The key question to be addressed is whether requirements on increasing the amount of recycled content in textile products replaces the production of virgin fibres. In a recent study (https://ivl.diva-portal.org/smash/record.jsf?pid=diva2%3A1833833&dsid=-9836, November 2023), the Swedish Environmental Research Institute analyses possible scenarios relating to a hypothetical increase in large-scale recycling. The authors state that: “as mechanically recycled fibres often rely on blending with a substantial share of primary fibres in yarn spinning, the environmental impact of the final yarn will depend on the environmental impact of the primary fibres used for blending.”</p>	

ID	Stated section; stated line	Comment	Answer
		<p>There are also currently no rules to specify the type of recycled input which is used in a product (post-consumer textile waste/post-consumer plastic bottles). This should be clarified as part of the revision of the Textile Labelling Regulation.</p> <p>The Parliament Resolution on the EU Strategy for Sustainable and Circular Textiles acknowledges that production of clothing from recycled bottles is not consistent with the circular model for PET bottles and that misleading claims should not be made about the recycled content in clothing based on PET. There is a risk that by mandating recycled content the amount of polyester in all products will increase, stymieing further recycling and increasing microplastic pollution.</p> <p>The JRC should further investigate the robustness of the use of mass balance methods to underpin traceability of fibres, as well as the Global Recycling Standard to verify recycled content. European rules on measuring, declaring and verifying recycled content in products should use a proportional mass balance approach, if segregation is not possible, and should consider recycle from post-consumer waste only.</p>	
9	1; 164-166	<p>While the aspects mentioned in these rows are important parts of the EU Textile Strategy, we believe it is important to mention them all: “By 2030 textile products placed on the EU market are long-lived and recyclable, to a great extent made of recycled fibres, free of hazardous substances and produced in respect of social rights and the environment.” Ecodesign requirements should not just focus on making products more durable – which is very relevant – but also address the negative environmental impact of textile production by setting specific requirements on the production processes themselves. The EU Ecolabel criteria and the Best Available Techniques (BAT) Reference Document (BREF) for the Textiles Industry could, for instance, be used as a reference document for setting mandatory requirements on production processes. On chemicals, we understand that the focus of the ESPR should not overlap with REACH. However, the final ESPR compromise clearly states that “the establishment of performance requirements shall also where appropriate, reduce significant risks to human health or the environment”. Hence we believe that</p>	<p>Acknowledged.</p> <p>The analysis performed in the PS is addressing all product aspects reported in the Article 5 of the ESPR. This analysis ncludes environmental impacts in the manufacturing phase, the use of substances of concern, and the assessment of the recycled content.</p>

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		<p>performance requirements on chemicals should not just focus on ensuring that a product can be recycled, but should also focus on reducing risks to health or the environment by limiting chemical use in the production process and on the final product.</p> <p>We also call on the JRC to ensure the relevancy of recycled content is properly considered. Currently, just over 0.78 Mt of the 2.44 Mt of textiles which are collected in the EU are sent to recycling operations every year – according to data presented in the JRC’s own 2023 report ‘Techno-scientific assessment of the management options for used and waste textiles in the European Union’. Even with a projected increase in textile waste recycling capacity by 2035 to 1.3 Mt, if much of the 8 Mt of post-consumer textile waste which is currently sent to landfill or incineration is separately collected and sorted, it is a pipe dream to imagine that it can all be recycled into spinnable fibres, let alone that the EU would have enough spinning capacity.</p> <p>We urge the JRC to ensure attention is placed on reducing output in the sector rather than with a narrow focus on increasing the amount of recycled content in textile products for arguably small gains. The key question to be addressed is whether requirements on increasing the amount of recycled content in textile products replaces the production of virgin fibres. In a recent study (https://ivl.diva-portal.org/smash/record.jsf?pid=diva2%3A1833833&dswid=-9836, November 2023), the Swedish Environmental Research Institute analyses possible scenarios relating to a hypothetical increase in large-scale recycling. The authors state that: “as mechanically recycled fibres often rely on blending with a substantial share of primary fibres in yarn spinning, the environmental impact of the final yarn will depend on the environmental impact of the primary fibres used for blending.”</p> <p>There are also currently no rules to specify the type of recycled input which is used in a product (post-consumer textile waste/post-consumer plastic bottles). This should be clarified as part of the revision of the Textile Labelling Regulation.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>The Parliament Resolution on the EU Strategy for Sustainable and Circular Textiles acknowledges that production of clothing from recycled bottles is not consistent with the circular model for PET bottles and that misleading claims should not be made about the recycled content in clothing based on PET. There is a risk that by mandating recycled content the amount of polyester in all products will increase, stymieing further recycling and increasing microplastic pollution.</p> <p>The JRC should further investigate the robustness of the use of mass balance methods to underpin traceability of fibres, as well as the Global Recycling Standard to verify recycled content. European rules on measuring, declaring and verifying recycled content in products should use a proportional mass balance approach, if segregation is not possible, and should consider recycle from post-consumer waste only.</p>	
10	1. Introduction 4.1.2 EU legislation in preparation 6.4.3 Person-product attachment; 164- 167 862-864 2127	<p>Lack of ambition to tackle overproduction and overconsumption under the ESPR.</p> <p>It is estimated that only one-third of textile waste is discarded for physical reasons, indicating that consumer disposal behavior – and, by extension, consumption behavior – is influenced by more than just the physical durability of textiles. Emotional attachment, fashion trends, and the availability of clothing also play significant roles. To effectively address these factors, ecodesign criteria should extend beyond the physical durability of textile products and should focus on regulating production volumes, which are the primary drivers of textile overconsumption. Additionally, the JRC team must ensure that policy initiatives are consistent. Decisions made in the delegated act will have a significant impact on future legislation, especially concerning future ecomodulation rules under the revised Waste Framework Directive.</p>	<p>Acknowledged.</p> <p>The PS is also addressing the influence of the quantity of products placed on the market. The section 5.2 and Figure 7A provide important data that wil be used in Task 7 of the MEErP on policy scenarios. Nevertheless, the ESPR does not allow to limit the number of products placed on the market. The Commission is working hard to ensure positive synerges among several legal frameworks.</p>
11	1; 165	<p>As pointed out by this study, for example, there's no scientific evidence that better physical durability would actually reduce textile consumption and associated environmental impacts</p>	<p>Acknowledged.</p> <p>The PS is also addressing the influence of the quantity of products placed on the market. The section 5.2 and Figure 7A provide important</p>

ID	Stated section; stated line	Comment	Answer
		https://clothingresearch.oslomet.no/2023/03/17/new-briefing-outlining-research-behind-the-tpr-proposal/	<p>data that will be used in Task 7 of the MEErP on policy scenarios. Nevertheless, the ESPR does not allow to limit the number of products placed on the market.</p>
12	1. Introduction 4.4 Tests and standards; 170-174 942-945	<p>PEFCR A&F is a dying beast, and will never, or at least not for a very long time, be functional to compare products' environmental impact. An alternative and simpler model is to start by identifying particularly problematic products and regulate these out first - and preferably through bans. Examples of good candidates for such regulation are:</p> <ul style="list-style-type: none"> • Clothes and shoes with electronics (e.g. flashing lights on Santa hats and Christmas sweaters) • Clothes that cannot be cleaned without losing functionality (e.g. waterproof jackets with down filling) • Clothes that have been pre-distressed to look worn, have holes, etc. (e.g. distressed denim products) • Promotional clothing items given away for free or single use <p>The preparatory study document should contain knowledge that points to which products should disappear from the market first and how these should be identified. Cooperation with NGOs could be a good thing here. Key questions to explore could include: What can we do without? For which products is plastic unnecessary, or particularly harmful? How can such work be seen in the context of the development of a global plastics agreement? Chemicals and a more up-to-date understanding of the skin as open to our surroundings is vital, so that the understanding of chemicals in textiles includes both direct contact with the skin and through the dust (and microplastic) we inhale. Environmental issues must encompass both the global and the local, and also not only the nature around us, but also within us.</p>	<p>Acknowledged. The PS is developed inside the framework of the ESPR. Synergies with other legislative frameworks and instruments are continuously explored.</p>

ID	Stated section; stated line	Comment	Answer
		<p>Reference:</p> <p>Klepp, I. G., Laitala, K., Berg, L. L., Tobiasson, T. S., Måge, J., & Hvass, K. K. (2023a). Critical review of Product Environmental Footprint (PEF) - Why PEF currently favors synthetic textiles (plastics) and therefore also fast fashion. Retrieved from Oslo: https://clothingresearch.oslomet.no/wp-content/uploads/sites/1026/2023/02/Background-paper-on-PEF.pdf</p>	
13	1; 170	<p>While we are very supportive for the Product Environmental Footprint based approach, this paper also outlines well the current limitations. We see constantly increasing use of synthetic fibres, without associated societal externalities and costs taken fully into account. https://clothingresearch.oslomet.no/wp-content/uploads/sites/1026/2023/02/Background-paper-on-PEF.pdf</p>	<p>Acknowledged.</p> <p>The PS will perform a specific environmental and economic assessment of the products in the scope in the following Tasks 5 and 6 of the MEErP.</p>
14	1; 170	<p>It is advantageous to utilize work performed in the PEFCR for apparel and footwear for a DA on textiles since it includes a thorough and systematic identification of technical and environmental aspects of particular relevance for the sector.</p>	<p>Acknowledged.</p> <p>The PS will perform a specific environmental and economic assessment of the products in the scope in the following Tasks 5 and 6 of the MEErP.</p>
15	1 Introduction; 184 ff.	<p>We recognise the overall challenge that textiles are one of the first product group for which ecodesign requirements are being developed under the ESPR, and also one of the first non-energy related product group for which ecodesign requirements are being developed. Therefore, the current MEErP (Methodology for Ecodesign of Energy related Products) may not be strictly applicable but requires the development of pragmatic and flexible methodological approaches.</p> <p>However, we would like to recall that according to the MEErP structure, Tasks 1 to 4 form the basis for defining the representative products and the context. The JRC proposes to cover Task 4 on technologies in the next phase together with the analysis of base cases from an environmental and economic perspective. The absence of Task 4 however makes it difficult to assess where information is missing in Tasks 1 to 3.</p> <p>The task on the scope should provide a detailed overview of existing legislation, voluntary schemes and standards with the aim to define the functional unit of the product group and the possible scope of a potential regulation. Task 1 is a very</p>	<p>Rejected.</p> <p>As showed in Table 7, energy is a crucial element of the apparel textile value chain. For this reason, apparel textiles can be defined as energy-related products.</p> <p>This PS is developed in parallel with a methodology specific for products regulated under the ESPR. The ESPR methodology will be publically available as soon as it will be finalised.</p> <p>The authors of the PS do not understand how the analysis of the scope and relevant legislation should be improved. Nevertheless, the analysis of technologies (Task 4), which will be presented in the 2nd milestone, will contain more insights about the influence of specific</p>

ID	Stated section; stated line	Comment	Answer
		important working step within a preparatory study as the scope, its exceptions, the definitions as well as existing standards, the links with the existing legislation and the elimination of remaining gaps form the basis for drafting the delegated act. Therefore section 4 on legislation, strategies and voluntary environmental labels relevant for the textile sector should be revised in order to include the assessment for the scope definition.	legislation for particular product aspects reported in Article 5 of the ESPR.
16	1; 184	MEErP is focussing on energy related products. It is not suitable for textile products. CEN/TC248/WG39 is working on circular aspects on specific textiles because textiles clearly need a different approach. Please follow or integrate the CEN approach.	Rejected. As showed in Table 7, energy is a crucial element of the apparel textile value chain. For this reason, apparel textiles can be defined as energy-related products. This PS is developed in parallel with a methodology specific for products regulated under the ESPR. The ESPR methodology will be publically available as soon as it will be finalised. Clarifications added in the text.
17	1; 201	It is crucial to update the list of BAT and NBAT with the very latest update focusing the EU markets internal capabilities, as the technological advancement is fast pacing, i.e https://www.stjm.fi/wp-content/uploads/2023/10/STJM_Ecological_Textile_Fibres_from_Finland_2023_ENG.pdf which already present several NBAT technology updates with very recent updates.	Acknowledged. The analysis of the technologies will be addressed in the 2 nd milestone.
18	Introduction; 231, Table 1 (2nd milestone)	Question: How and where will solvent based recycling be positioned? How can we differentiate the process towards chemical and mechanical recycling definitions?	Clarified. Recycling will be addressed in the following milestones.
19	1; 285	Please insert all definitions including home/interior textiles, footwear and other technical textile terms (e.g. post-industrial).	Accepted. The definitions were included in the text.
20	1; Lines 295 to 297 Lines 298 to 307	- In general, we are in favor of the broadest coverage to ensure the largest environmental impact reduction potential, level the playing field for industry and ensure no loopholes are created in the legislation. However, a low-hanging fruit is needed to define a feasible framework, with a stepwise approach for the implementation of textile eco-design requirements. Start by selecting 3-4 main eco-design requirements with an achievable level of compliance and enforcement, that could be implemented across all clothing product categories and increase the level of compliance and the number of eco-design requirements progressively. This approach	Clarified. The text has been updated to clarify that technical apparel textiles such as workwear and sportswear are included in the scope of the PS. The discussion of the inclusion or exclusion of these products from the scope is postponed after the definition of the ecodesign requirements within this PS. The requirements

ID	Stated section; stated line	Comment	Answer
		<p>will lead to leverage the impact of the regulation on the market, in a short period of time.</p> <ul style="list-style-type: none"> - The textile product's function should be the determining factor to set ecodesign requirements, i.e. a product worn as clothing or clothing accessory by a person. All apparel should be included regardless if it has technical or functional properties. - The current definitions of apparel and technical textiles create uncertainty as per the criteria for the exclusion of workwear and sportswear in particular. In particular, the aesthetic or non-aesthetic intention is a subjective criteria subject to various interpretations. We believe that it should not be possible to exclude technical textiles from the scope based on non-aesthetic intentions. - Based on the proposed definition, technical textiles should not be excluded from the scope as there is too much overlap between the definition of apparel and technical textiles, especially for sportswear. - We recommend adaptations to the current definitions: <ul style="list-style-type: none"> o The definition of apparel textiles should include functional textiles i.e. apparel that have specific functional properties that are key for the intended use of the product (eg. waterproofness, water repellence, communicated insulation values). o It should be made very clear when technical apparel textiles would fall under the definition of "technical" rather than "apparel". The definition of technical textiles generates confusion as regards its exact scope and the potential exclusion from ecodesign requirements. It is not clear if apparel textiles meeting this definition (i.e. 'technical apparel textiles') would still be considered within the scope of 'apparel' – and thereby subject to the ecodesign requirements - regardless of being considered sportswear or workwear. 	<p>should be horizontal and do not hinder the performances of the products in the scope.</p>

5 Comments on section 2 – Definitions

Table 3. Comments on section 2 – Definitions

ID	Stated section; stated line	Comment	Answer
21	2; 285	<p>We agree with the definition of the sub-groups established in the preliminary study and suggest to also add a definition on “fibres”. The separation of technical textiles from apparel is appreciated as the functionalities differ.</p> <p>We would suggest adding a clarification for the exclusion of footwear for this study.</p> <p>Besides the scope and definition themselves, it is of utmost importance to have consistency between international, EU and national legislations considering textile-related products (also footwear) and to avoid double regulations. Therefore, it is essential that the scope, definitions, and requirements of the Delegated Acts are aligned across all legislations.</p>	<p>Clarified. The definition of textile fibre was added in the list and taken from the Textile Labelling Regulation. The reasons of focussing on apparel textile, and therefore excluding footwear from the study, are reported in section 3.1.</p>
22	2; 285-307	<p>1. Do you agree with definitions provided for textile product, apparel textiles and technical textiles? Why?</p> <p>We agree, the definitions look ok. Just a reflection – it could be wise to reconcile with standardizations such as CEN etc.</p> <p>We wonder if the scope of some REACH restrictions could also be looked into when defining the scope.</p>	<p>Clarified. Alignment with definitions reported in other legislations is prioritised. Nevertheless, for new terminology the proposals reported in standards will be taken into account. The analysis of the substances of concern and the interaction with REACH will be considered in the following milestones.</p>
23	2; 288-293	<p>[...] support the definition of ‘textile products’ from TLR. Please ensure that the definition always is aligned with the TLR ongoing revisions.</p>	<p>Acknowledged.</p>
24	Section 2; 288-293	<p>The definition of “textile product” relies on the definition of what a textile fibre is, which is not defined in the preliminary study. The</p>	<p>Clarified.</p>

ID	Stated section; stated line	Comment	Answer
		Textile Labelling Regulation is referenced here, yet the Regulation is currently being reviewed. We recommend ensuring consistency and clarity among the definitions of textile products and fibres.	The definition of textile fibre was added in the list and taken from the Textile Labelling Regulation. The same Commission Staff is involved in both this PS and in the revision of the TLR. The Commission is working to establish synergies between these two instruments.
25	2; 288-293	[...] welcomes the use of the definition of 'textile product' from the Textile Labelling Regulation (TLR) and stresses the importance of keeping alignment with the TLR ongoing revision.	Acknowledged. The same Commission Staff is involved in both this PS and in the revision of the TLR. The Commission is working to establish synergies between these two instruments.
26	2; 288-293	The definition of "textile product" relies on the definition of what a textile fibre is, which is not defined in the preliminary study. The Textile Labelling Regulation is referenced here, yet the Regulation is currently being reviewed. We recommend ensuring consistency and clarity among the definitions of textile products and fibres.	Clarified. The definition of textile fibre was added in the list and taken from the Textile Labelling Regulation. The same Commission Staff is involved in both this PS and in the revision of the TLR. The Commission is working to establish synergies between these two instruments.
27	2; 288	[...] supports the definition for Textile product and alignment with the TLR.	Acknowledged.
28	2; 288-293	We support to reference the existing definition of textile product as already set out in the TLR. This is critical for consistency and harmonisation of legislative requirements. It must however be noted, that when recyclability eco-design measures will be set, these must take into account that a significant non-textile part (up to 20%) could be present in products.	Acknowledged.
29	2; 288-293	It is worth noting that some restrictions on textiles adopted under the REACH regulation have a slightly broader definition of textile products, namely "textile article" means any unfinished, semi-finished or finished product which is composed of at least 80 % textile fibres by weight, or any other product that contains a part which is composed of at least 80 % textile fibres by weight, including products such as clothing, accessories, interior textiles, fibres, yarn, fabrics and knitted panels" (see entry 46a of Annex XVII of REACH - emphasis added)	Rejected. The definition of 'textile article' provided under REACH literally refers to terminology reported in entry 46a of Annex XVII to REACH: " <i>For the purposes of paragraphs 1 and 2, 'textile article' means [...]</i> ". The authors consider that the proposed definition is aligned with the terminology used in REACH, which

ID	Stated section; stated line	Comment	Answer
			only adds some examples compared to what reported in the PS.
30	2; 291	Please ensure that the definition of a textile product follow the TLR, so if this definition changes in the TLR review, this should also be reflected in the final report and consequently Delegated Act	Clarified. The definition of textile fibre was added in the list and taken from the Textile Labelling Regulation. The same Commission Staff is involved in both this PS and in the revision of the TLR. The Commisison is working to establish synergies between these two instruments.
31	2; 291	<p>There are important aspects to be recognized in terms of recycled content/recyclability.</p> <ul style="list-style-type: none"> • While a minimum requirement for recycled content can potentially have a positive environmental effect, the demand and availability of recycled fibres is not matching. There is still a need to scale up fibre to fibre recycling technologies. This is crucial, as recycling of e.g. PET bottles will no longer be accepted. • Recycled content can hamper the quality and durability of garments, that are of higher quality. A balance is therefore needed to ensure that companies buying and selling garments of higher quality don't have to compromise with the quality of the garments. It is therefore crucial to have in mind what the consequences of volume vs. quality are. • That is why setting the requirements on portfolio level for each material will ensure the flexibility needed to set a high ambition level, as it will support not compromise, minimum product requirements on durability and recyclability. Going forward, we expect that these trade-offs will be less significant due to technological developments. • Further we recommend expanding the scope to include renewable/innovative materials. 	Acknowledged. Recycled content and recyclability will be addressed in the following milestones.
32	2; 291	It is critical to align definitions with the TLR, however it must be noted that eco-design measures on recyclability requirements may apply differently to products that have a high percentage of non-textile parts, which is still however below 20%	Acknowledged. Recyclability will be addressed in the following milestones.

ID	Stated section; stated line	Comment	Answer
33	2 Definitions; 294-297	<p>[...] thinks a simplified approach should be followed and proposes the following definition:</p> <p>“Apparel textiles are textile products that aim to cover the body with everything except footwear”.</p> <p>This definition has been adapted from EN ISO 11610:2023.</p>	<p>Rejected. The authors prefer the current proposal because it expresses the uses and aim of apparel textiles.</p>
34	2; 294-297	<p>[...] suggests simplifying the definition to refer mainly to clothing that covers the body and outline additional functions.</p> <p>Suggested alternative language:</p> <p>‘Textile apparel’ are textile products that aim to cover the body with everything except footwear. In addition, it also means a textile product worn as clothing or a clothing accessory by a person to clothe and/or adorn, and/or shield from, and/or feel comfortable with the outer environment and/or to express their personal and professional identity and/or belonging to a specific social group, with symbolic meanings and aesthetic values.’</p> <p>[...] stresses the need to ensure that there is no misinterpretation of this definition by authorities leading to wrongful inclusion of PPE under this definition.</p>	<p>Accepted. The suggestion was adopted in the text.</p>
35	2; 294	<p>Textile Apparel is more commonly used by the industry than Apparel Textile.</p> <p>Textile Apparel is also used to express the professional identity, not only personal. This should be added to the definition.</p>	<p>Accepted. The definition was updated.</p>
36	2; 294-304	<p>"Apparel textile' means a textile product to be worn as clothing or a clothing accessoire by a person to protect from the outer environment.</p>	<p>Rejected.</p>

ID	Stated section; stated line	Comment	Answer
		Suggest not to use the technical textile definition."	The definition was updated. It is not clear the reason to avoid reporting the definition of technical textiles.
37	2. Definitions; 295-297 298 - 307	<p>We support the broadest inclusion of textile and coverage to ensure the largest environmental impact, level playing field with EU and International players and prevent loopholes and free-riders.</p> <p>We agree that the products' function remains a determining factor to set eco-design requirements and call on all apparel to be included in the work of the Forum.</p> <p>We suggest improving the definitions. The current definitions of apparel and technical textiles create uncertainty as per the criteria for the exclusion of workwear and sportswear in particular. In particular, the aesthetic or non-aesthetic intention is a subjective criterion subject to various interpretations. We believe that it should not be possible to exclude technical textiles from the scope based on non-aesthetic intention.</p> <p>Based on the proposed definition, technical textiles should not be excluded from the scope as there is too much overlap between the definition of apparel and technical textiles, especially for sportswear.</p>	<p>Clarified. Technical textile apparel such as workwear and sportswear belong to the scope of the PS. This is specified in the section about the scope. The stakeholder is invited to propose a new definition of technical textile that can clearly distinguish technical textiles from textiles that do not show technical features.</p>
38	2; 295-297 298-307	<p>Definition of 'Apparel textile' (line 295-297) and definition of technical textiles (lines 298-307):</p> <ul style="list-style-type: none"> • We agree with the textile product's function should be the determining factor to set eco-design requirements i.e. a product worn as clothing or a clothing accessory by a person, meaning all apparel should be included. • The product scope must be broad enough to ensure largest environmental impact reduction potential and circular improvement potential, levelling the playing field for the industry and ensure no loopholes are created in the legislation i.e. all apparel textiles, regardless if it has technical/functional properties must be included in the scope. 	<p>Clarified. Technical textile apparel such as workwear and sportswear belong to the scope of the PS. This is specified in section 3.2.2. The stakeholder is invited to propose a new definition of technical textile that can clearly distinguish technical textiles from textiles that do not show technical features.</p> <p>The products included in the scope will be revised in the following milestones when ecodesign requirements will be proposed.</p>

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> <li data-bbox="678 296 1417 416">• It will be critical that definitions are clear and do not allow for interpretation. How the definitions are written now, will likely create a loophole for garments that have a functional property (eg. outerwear, sportswear). This must be avoided. <li data-bbox="678 456 1435 730">• Based on the proposed definition, technical apparel textiles should not be excluded from the scope as there is too much overlap between the definition of apparel and technical textiles. Also, it is not possible to define/exclude technical textiles based on their non-aesthetic intention as this is highly subjective if a garment is aesthetical or not. In particular, the aesthetic or non-aesthetic intention is a subjective criterion subject to various interpretations. We believe that it should not be possible to exclude technical textiles from the scope based on non-aesthetic intentions. <li data-bbox="678 770 1435 1204">• Include functional apparel textiles into definition of apparel textiles: We believe there is potential in strengthening the definitions further by explicitly including functional apparel textiles into the definition of apparel textiles. e.g. we believe suggesting that thermoregulatory properties could make an apparel a technical textile, could create loopholes in the legislation. For instance, e.g. many garments (outerwear, sportswear) have specific functional properties added to them that are key for the intended use of the product and that will affect the product's service lifespan if not sustained/durable. E.g. water proofness, water repellence and communicated insulation values. In cases where such functional claim is made, a functional test should be performed to secure the claimed property/value, in context of future durability/functionality testing under eco-design measures. <li data-bbox="678 1308 1417 1394">• Clear exemptions (Comments to section 3.2.2) : Only products with a purpose that cannot be fulfilled when complying with eco-design requirements can be exempted from the ESPR. These products can 	

ID	Stated section; stated line	Comment	Answer
		be exempted based on their specific function and the circumstances of their uses, for instance, extreme or harsh conditions, or because applying eco-design requirements would hamper their properties or affect human health and safety. Only where very clear exemptions can be determined, those should be excluded from the scope of the Delegated Act e.g. PPE, medical devices, e-textiles/smart textiles	
39	2; 296	using the wording "to protect from the outer environment" can be interpreted as Personal Protective Equipment. It would be better to specify that this does not mean protecting against risks to the wearer's health or safety (see definition of PPE in Regulation (EU)2016/425 article 3 (1))	Rejected. Textile apparel could be a PPE. Nevertheless, PPE is not included in the scope of this PS as specified in the section 3.2.2.
40	2; 296	(Toy) disguise costumes are to be worn as a part of play, make believe, and imagination, which is a different user behaviour pattern than wearing typical t-shirts or sweaters. Costumes are not intended to protect the human body from the outer environment, as the chosen definition of textiles apparel suggests. This point already flags that the inclusion of this product in the scope of the delegated act is not appropriate.	Acknowledged The list of products to be excluded from the scope of the PS was updated.
41	2; 298-307	[...] support the categorization of apparel textiles, home/interior textiles, footwear, and technical textiles. However, the definition on technical textiles is too vague and we predict that it will be difficult for companies to decide whether their product falls within the scope of apparel (and thereby subject to ecodesign requirement and covered by this study) or under technical textiles. This specially apply for products with technical function such as outer-, outdoor-, sports- and workwear that can have cross-functional properties and purposes that fall under both the definition on 'apparel textile' and 'technical textile'. If technical textile is not to be included in the scope for the study, it should be made very clear when such technical apparel textile would fall under the "technical" rather than "apparel". We stress that only products with a purpose that cannot be fulfilled	Acknowledged. Technical textile apparel such as workwear and sportswear belong to the scope of the PS. This is specified In section 3.2.2. The stakeholder is invited to propose a new definition of technical textile that can clearly distinguish technical textiles from textiles that do not show technical features. The products included in the scope will be revised in the following milestones when ecodesign requirements will be proposed.

ID	Stated section; stated line	Comment	Answer
		<p>when complying with ecodesign requirements can be excepted from the ESPR. These products can be excepted as they must be able to operate under specific, extreme, and harsh conditions, or because ecodesign requirements will negatively affect human health and safety. It is important that ESPR will not be watered down by too many exceptions and thereby not fulfil its purpose by significantly reduce negative environmental impacts and improve the internal market.</p> <p>Regarding definitions and possible exceptions from the scope of this study, [...] would like to highlight the need to ensure legislative consistency with the ongoing revision of the Waste Framework Directive (WFD). Specially the references to the ESPR in relation to the extended producer responsibility for textiles, and the eco-modulated fees in WFD.</p>	<p>The Commission is working for a full synergy among different legislative frameworks, including ESPR and WFD.</p>
42	2; Lines 298 to 307 Line 530	<p>- We recognize the ongoing work of the PEFCR A&F to be considered when developing ecodesign requirements. However, to ensure proper applicability, simplification of the product categories could be needed, as well as adaptations of the level of performance, tests, value, threshold, or even exceptions if technically needed.</p> <p>- Exemptions must be clear and few. Only products with a purpose that cannot be fulfilled when complying with ecodesign requirements can be exempted from the ESPR. These products can be exempted based on their specific function and the circumstances of their uses, for instance, extreme or harsh conditions, or because applying ecodesign requirements would hamper their properties or affect human health and safety. This would be the case of PPE, e-textiles, smart textiles, medical devices, as well as defense equipment, and space technologies.</p> <p>- As the purpose of apparel and footwear products does not come close to meeting these exceptions, sportswear, leisure, and fashion products should all be within equal scope of the ESPR regulation.</p>	<p>Acknowledged.</p> <p>The PS is assessing products in the scope within the framework of the ESPR and using any available knowledge.</p> <p>Technical textile apparel such as workwear and sportswear belong to the scope of the PS. This is specified in section 3.2.2.</p> <p>The stakeholder is invited to propose new definitions to better distinguish products.</p> <p>The products included in the scope will be revised in the following milestones when ecodesign requirements will be proposed.</p>

ID	Stated section; stated line	Comment	Answer
		<p>This includes information requirements referred to in Article 7(1) as:</p> <ul style="list-style-type: none"> • Technical specifications are available for sportswear, leisure, and fashion products in relation to the essential requirements included in Article 10. • No other frameworks set ecodesign requirements or includes a system for the digital provision of information related to fashion and sportswear textile products. <p>- In addition, we recommend adding some more clarity to the suggested products excluded from scope:</p> <ul style="list-style-type: none"> • "Smart textiles" need a much more defined scope as it is not defined what is meant by "sensors", so it should be further explained and followed up with examples • Aspects related to customised apparel textiles and upcycled textiles; when looking further into this please be very diligent in defining when the "customised" applies; there is a big difference if this is done in a more automated way (like a consumer ordering a piece with e.g. initials) or if pieces are being tailormade. Putting a print on a garment should not be enough to be excluded from ecodesign, here ecodesign could be inspired by the same principles as the product safety regulation 	
43	Section 2; 298-307	<p>The definition states that workwear and sports equipment meet both technical and aesthetic criteria. However, this is not always the case. For instance, workwear also includes branded clothing and corporate clothing or uniforms, which do not meet technical criteria per se. Furthermore, many sportswear items mainly protect from the outer environment while doing physical activity, which reflects the definition of apparel textiles, and do not have any other specific certified functionality. We recommend, therefore, amending lines 299 and 300 to reflect this reality.</p>	<p>Accepted. The definition is modified expressing that in workwear and sportswear both technical and aesthetic criteria could be met simultaneously.</p>

ID	Stated section; stated line	Comment	Answer
44	2; 298-307	<p>The definition states that workwear and sports equipment meet both technical and aesthetic criteria. However, this is not always the case. For instance, workwear also includes branded clothing and corporate clothing or uniforms, which do not meet technical criteria per se. Furthermore, many sportswear items mainly protect from the outer environment while doing physical activity, which reflects the definition of apparel textiles, and do not have any other specific certified functionality. We recommend, therefore, amending lines 299 and 300 to reflect this reality.</p>	<p>Accepted. The definition is modified expressing that in workwear and sportswear both technical and aesthetic criteria could be met simultaneously.</p>
45	2; 298	<p>We agree with the definition of Technical Textile.</p>	<p>Acknowledged.</p>
46	2; 298 ff	<p>We suggest to re-word the definition of Technical (Apparel) Textiles (also referred to in section 3.2.1, line 521 while considering the following:</p> <p>Technical apparel textiles are specifically engineered to provide a (multi)functional utility to the wearer. The functionality of the textile is a central aspect for the wearer, not the exact end-use. Indeed, it may be of environmental benefit to use the same jacket for multiple activities.</p> <p>- Typically the functionality serves to protect the wearer and/or help to enhance wearer performance.</p> <p>- Functionality characteristics could include thermoregulatory properties that impact protection and/or performance (such as waterproofness, windproofness, moisture management, etc.), as well as incorporated properties like UV blocking, insect repellence, odor absorbent/resistance, chemical resistance, flame retardance, or antibacterial, antiviral, and anti-static characteristics, etc.</p>	<p>Partly accepted. The proposal was accepted in terms of “expected inherent functionality of the product”, replacing the reference to the end use.</p> <p>Other changes were not adopted because:</p> <ul style="list-style-type: none"> - a technical product not necessarily addresses simultaneously aesthetic and technical aspects; - the reference to what can be labelled with a specific level of performance will be investigated in the following milestones, when ecodesign requirements will be proposed.

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> - Can be used for technical consumer apparel, professional apparel, as well as incorporated into systems to use as personal protective equipment. - The functionality is either in the material in itself and/or in the construction of the apparel. For example, waterproofness requires sealed seams. Because of the functionality, these products often lead to complex materials and/or constructions, which pose specific challenges in terms of eco-design. - This functionality is labeled and/or apparent to the wearer and comes with performance and durability expectations related to this functionality. - Because the functionality is usually a central or critical aspect of the purchase, perceived loss of this functionality often results in the consumer choosing to retire the garment and/or replace it to achieve the wished function, regardless of the aesthetics. Therefore, maintaining functionality is critical to the lifetime of the product, hence durability requirements for technical textiles must include durability of function. <p>We suggest changing the definition as follows:</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Technical textiles are textile products meeting functional requirements in addition to aesthetic criteria. 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 expected inherent functionality of the product. This functionality is labeled and/or apparent to the wearer and comes with performance and durability expectations related to this functionality. Technical textiles can be used by professionals or not.</p>	
47	<p>2; Question Do you agree with definitions provided for textile product, apparel textiles and technical textiles? Why?</p>	<p>It is recommended that the textile content of smart products and personal protective products be included within the scope of the directive, as long as the textile content can be identified/assembled.</p> <p>It is appropriate to use the expression clothing. Apparel in its general meaning also includes home textiles and those products have stitch over it.</p> <p>Technical textile refers to all kinds of products. It is recommended that these products be classified as follows and included in the scope of the directive:</p> <ul style="list-style-type: none"> -Technical Yarn and Fabric (Strengthened Yarn and Fabric, Yarns and Fabrics of Impregnated, Coated, Covered or Laminated with Plastics or Gum, Metalised Yarn and Fabric etc.) -Clothing made of technical yarns and/or fabrics -Non-clothing products made of technical yarns and/or fabrics (camping materials, tubes, life jackets, belts, ropes and nets, fishing nets etc.) -Cleaning Cloths -Nonwoven Products <p>It is appropriate to use the expression "Clothing made of technical yarns and/or fabrics" (workwear, sportswear, antibacterial socks etc.)</p>	<p>Rejected</p> <p>This PS addresses only final products. For this reason, the scope cannot include intermediary products like textile parts of specific products, such as the smart textile products and PPE.</p> <p>So far, the consultation with numerous stakeholders did not revealed that the term 'apparel' is used also for home and interior textiles.</p> <p>The JRC will keep on discussing this with all stakeholders to adopt a commonly recognised terminology.</p>

ID	Stated section; stated line	Comment	Answer
48	2. Definitions; 299 - 304	<p>[...] would like to propose modification to the definition of technical textiles to include reference to performance criteria as following:</p> <p>“Technical textiles are textile products meeting technical performance rather than aesthetic criteria, even if, for certain end-uses like workwear 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 and on the expected inherent functionality of the product. This functionality is labelled and/or apparent to the wearer and comes with performance and durability expectations related to functionality.”</p> <p>Considering references to specific product categories such as workwear and sportswear later in the section on the scope, and the outcomes of the discussion during the JRC workshops on the 18th of March, the industry calls for establishment of definitions for said product categories in order to facilitate future discussions in MEErP task 6. It is fundamental that the distinction between the different textile categories is based on precise definitions with parameters and characteristics that allow for clear separation between products based on their intended use, as in other existing legislations such as Personal Protective Equipment Regulation, General Product Safety Regulation and Toys Safety Directive.</p> <p>Intended use for sportswear is a decisive factor as this has an impact on:</p>	<p>Partly accepted. The proposal was accepted in terms of “expected inherent functionality of the product”, replacing the reference to the end use.</p> <p>The reference to what can be labelled with a specific level of performance will be investigated in the following milestones, when ecodesign requirements will be proposed.</p> <p>The product categories are strictly related to the product aspects to be addressed. This will be analysed in the following milestones.</p> <p>The products included in the scope will be revised in the following milestones when ecodesign requirements will be proposed.</p>

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> - garment design, - material choice (fiber type, yarn), - construction (e.g., compression), - fabrications (e.g., sweat-wicking), - finishing treatment <p>These choices result in sportswear specific performance characteristics, consumer use and expected function and functionality as well as environmental impact. For example, advanced finishing technologies used by the sportswear sector include e.g. lamination.</p> <p>In this context, [...] calls for establishment of the definition of technical sportswear, as mentioned by the JRC in the targeted consultations (questions 4.10 and 4.11), that would incorporate, apart from technical and performance criteria mentioned in the definition of technical textiles, also a reference to the design and intended use of the product for sports and physical activity, aligned with the wording and implementation already existing in EU law, e.g. governing the choice of which product safety rules should be applied by manufacturers in the area of child safety of toys (Toys Safety Directive ,2009/48/EC, Article 2 (1) “This Directive shall apply to products designed or intended, whether or not exclusively, for use in play by children under 14 years of age (hereinafter referred to as toys”).</p> <p>Establishing clear definitions and subcategories will be critical when understanding and weighting trade-offs between eco-design</p>	

ID	Stated section; stated line	Comment	Answer
		requirements, particularly those linked to durability recycled content and recyclability and setting criteria adequate to the functionality and performance of the products themselves.	
49	2; 299-304	The definition of technical textiles is very vague. I suppose this is the most important sentence. wide range of specific requirements: lightness, resistance, reinforcement, filtration, fire retardancy, conductivity, insulation, flexibility, absorption and so on." but I still could not precisely say what is a technical textiles. Even the last sentence "Technical textiles can be used by professionals or not." is super vague.	Acknowledged. The stakeholder is invited to propose specific improvements to the current definition.
50	2.Definitions; 300-307	Comments to the definition for textiles: "The definition does not depend on the raw material, the fibre or the technology used, but on the end use of the product itself". We find the definition to be too open, and we fear that the very open definition could become an open door for exceptions from the scope of the regulations.	Clarified. The sentence was updated and referred to the expected inherent functionality: <i>"The definition does not depend on the raw material, the fibre or the technology used, but on the expected inherent functionality of the product itself."</i> The stakeholder is invited to propose specific improvements to the current definition. The products in the scope of the PS will be rediscussed in the following milestones when ecodesign requirements will be proposed.
51	2; 302	If technical textile is relevant, please add water resistancy (as this might be an important PFAS source)	Rejected. Disregarding what is included in the definition, the PS will address substances of concern in the framework of the ESPR. The list of functionalities in the definition is not exhaustive.
52	2; 305	Because of the central role of functionality in Technical Apparel Textiles, setting eco-design criteria requires a different approach than for general textiles. Some considerations:	Acknowledged. Ecodesign requirements will be developed in the following milestones and the products included in the scope of the PS will be reassessed. This is reported in section 3.2.1. JRC welcomes any well-documented contribution.

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> • Increased durability and longer product use is the most important factor to lower the environmental footprint of apparel and enable a circular and more sustainable apparel industry. • In technical apparel textiles, material, economic and environmental investments are usually higher, which makes extending the lifetime and avoiding early retirement essential. Hence, durability should be an even higher priority for these products. • Because the reason people buy and dispose of Technical Textiles is directly linked to the expected functionality, maintaining durability of function is central to avoid end of life / retiring. Therefore, durability criteria for technical textiles must be extended to include functionality. • Further, to achieve and maintain functionality there are specific challenges tied to recyclability and the use of recycled materials. Due to complex construction, such as sealed seams, and/or multiple and complex materials, recycling may not provide the expected sustainability benefits. • Recycled high performance materials, such as mechanically recycled polyamide are tied to challenges in lower performance and insecure supply. Future, more advanced (chemical) recycling infrastructure for textile industry still requires technical development and then scaling which will take substantial investment and time. <p>We are currently completing a comprehensive assessment on the possibilities and limitations for recycling of complex material forms. We would be happy to share further insights with JRC as we finalize this work, if this would be helpful.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>In Technical Apparel Textiles reasons for end of life are closely tied to loss of functionality, hence durability criteria need to include durability of function. We have data we believe prove that there are significant differences in durability of function in the market. Based on this, we see evidence that it is possible to come up with a relatively simple set of tests that can be used to differentiate durability of function for technical apparel textiles. We would be happy to share this data with the JRC.</p>	
53	2; 306	<p>We support the categorization of apparel textiles, home/interior textiles, footwear and technical textiles. However, the definition on technical textiles given in line 298 does not make it clear if apparel textiles meeting this definition would still be considered within the scope of “apparel” (and thereby subject to ecodesign requirement and covered by the study) regardless of being considered sports- or workwear. If technical apparel textiles are not included in the scope for the study, it should be made very clear, when such technical apparel textile would fall under the “technical” rather than “apparel”.</p> <p>The ESPR shall apply to any physical good that is placed on the market or put into service, including components and intermediate products. To meet the main objectives of the ESPR, exceptions must be few. If not, there is a risk that the ESPR will be watered down and not significantly reduce negative environmental impacts nor improve the functioning of the internal market.</p> <p>Only products with a purpose that cannot be fulfilled when complying with ecodesign requirements can be exempted from the ESPR. These products can be exempted as they must be able to operate under specific, extreme, and harsh conditions, or because ecodesign requirements will negatively affect human health and safety. In the ESPR proposal, defense equipment, space technologies,</p>	<p>Clarified. This section reports only definitions. The scope is described in section 3.2. Section 3.2.1 reports that the inclusion of workwear and sportswear in the scope will be reassessed in the following milestones when ecodesign requirements will be proposed.</p> <p>This PS addresses only final products. Other products could be addressed by other preparatory studies.</p>

ID	Stated section; stated line	Comment	Answer
		<p>and medical devices are listed as rare exemptions.</p> <p>As the purpose of apparel and footwear products does not come close meeting these exceptions, sportswear, leisure, and fashion products should all be within equal scope of the ESRP regulation.</p> <p>This includes information requirements referred to in Article 7(1) as:</p> <ul style="list-style-type: none"> • Technical specifications are available for sportswear, leisure, and fashion products in relation to the essential requirements included in Article 10. • No other frameworks set ecodesign requirements or includes a system for the digital provision of information related to fashion and sportswear textile products. <p>Importantly, this scope will also ensure legislative consistency with the Waste Framework Directive (WFD). In WFD, sportswear, leisure, and fashion products fall within the scope of the definition of textile articles of apparel and clothing accessories and thereby the Extended Producer Responsibility and the Eco-Modulation of fees.</p> <p>Therefore, all sport apparel products should be included.</p>	
54	Section 2 and 3.1.3; 308 and 474-476	We recommend including definitions of materials of animal origin, such as leather, fur, down and feathers and to include them in the scope of the PS. While we understand that requirements for such materials may be different from the ones for products made of textile fibres, we recommend setting the requirements on those	<p>Rejected.</p> <p>This PS focusses on textile products. Apparel made out of leather, fur and other materials could be addressed by other preparatory studies. These specific products would need a specific study due to</p>

ID	Stated section; stated line	Comment	Answer
		<p>materials, too, because of their environmental footprint and their extensive presence in the market, especially leather. According to Textile Exchange, global leather production—measured by the weight of raw hides—was around 13.4 million tonnes in 2022, using the hides and skins of over 1.5 billion animals. Leather goods/accessories and clothes represent 19% and 8% of the outlets for EU tanners' production respectively. The EU maintains its position as a leading world exporter of semi-processed leather. According to the Change Your Shoes report “A Tough Story of Leather”, tanning 1kg of leather with chromium uses up to 2.5kg of chemical substances, up to 250 litres of water, up to 210 MJ of energy and generates up to 6.1kg of solid waste. These numbers leave aside the farming phase and concentrate only on the industrial phase.</p> <p>Furthermore, having requirements on materials – and not just on the final product – is consistent with the approach we are advocating for overall; leather would not constitute an exception to the rule. On the other hand, consumers care about the material composition of the products they buy. The objective of ecodesign requirements should be to remove the worst-performing among the products made with the same material, not to put the performance of one material against another one. Finally, the PEF for Apparel and Footwear does not exclude leather and fur either.</p>	<p>different value chain, physical and chemical characteristics. PS study is developed in the framework of the ESPR, which is a mandatory framework for all products placed on the market.</p>
55	Section 2 Definitions and 3.1.3 Scope; 308 and 474-476	<p>We recommend including definitions of materials of animal origin, such as leather, fur, down and feathers and to include them in the scope of the PS. While we understand that requirements for such materials may be different from the ones for products made of textile fibres, we recommend setting the requirements on those materials, too, because of their environmental footprint and their extensive presence in the market, especially leather. According to Textile Exchange, global leather production—measured by the weight of raw hides—was around 13.4 million tonnes in 2022, using the hides and skins of over 1.5 billion animals. Leather goods/accessories and clothes represent 19% and 8% of the outlets for EU tanners' production respectively. The EU maintains its position as a leading world exporter of semi-processed leather. According to the Change Your Shoes report “A Tough Story of Leather”, tanning</p>	<p>Rejected.</p> <p>This PS focusses on textile products. Apparel made out of leather, fur and other materials could be addressed by other preparatory studies. These specific products would need a specific study due to different value chain, physical and chemical characteristics.</p> <p>The PS is developed in the framework of the ESPR, which is a mandatory framework for all products placed on the market.</p>

ID	Stated section; stated line	Comment	Answer
		<p>1kg of leather with chromium uses up to 2.5kg of chemical substances, up to 250 litres of water, up to 210 MJ of energy and generates up to 6.1kg of solid waste. These numbers leave aside the farming phase and concentrate only on the industrial phase.</p> <p>Furthermore, having requirements on materials – and not just on the final product – is consistent with the approach we are advocating for overall; leather would not constitute an exception to the rule. On the other hand, consumers care about the material composition of the products they buy. The objective of ecodesign requirements should be to remove the worst-performing among the products made with the same material, not to put the performance of one material against another one. Finally, the PEF for Apparel and Footwear does not exclude leather and fur either.</p>	

6 Comments on section 3 – Scope

6.1 Comments from ID 56 to ID 100

Table 4. Comments on section 3 – Scope. From ID 56 to ID 100

ID	Stated section; stated line	Comment	Answer
56	3; 289-291; 517-519	<p>We welcome the alignment of the scope of the DA with the definition outlined in the Textile Labelling Regulation 1007/2011 as those products containing at least 80 % by weight of textile fibres. However, as the TLR is currently under revision, the definition must be aligned with the final definition of textiles included in the revised TLR.</p> <p>It is fundamental that the distinction between the different textile categories is sustained in precise definitions, notably in the distinction and parameters to set the distinction between sportswear and technical textiles. We also welcome the exclusion of PPE textiles that have a CE marking. However, the definition of technical textiles given in line 298 does not make it clear if apparel textiles meeting this definition would still be considered within the scope of “apparel” (and thereby subject to ecodesign requirement and covered by the study) regardless of being considered sports- or workwear. If technical apparel textiles are not included in the scope of the study, it should be made very clear when they would fall under the “technical” rather than “apparel”.</p> <p>We also welcome the non-inclusion of footwear and home textiles in the first Delegate Act. Although we consider that there should be requirements in the future, those should be addressed separately.</p> <p>The definition of the scope and the setting of the different subcategories and minimum requirements will need to take into account the product’s functionality and intended use,</p>	<p>Clarified.</p> <p>The same Commission Staff is involved in both this PS and in the revision of the TLR. The Commission is working to establish synergies between these two instruments.</p> <p>Section 3.2.1 states that technical textile apparel, such as workwear and sportswear, are included in the scope.</p> <p>The stakeholder is invited to suggest specific improvements of the definitions in order to improve the distinction among generic technical textiles, sportswear and workwear.</p> <p>The following milestones will address the categorization of products considering specific product aspects reported in Article 5 of the ESPR.</p> <p>The PS is developed within the mandatory framework of the ESPR. Analysis is performed using any data and information available.</p>

ID	Stated section; stated line	Comment	Answer
		as well as the different fibers and materials composition of the product. This will be critical when understanding and weighing trade-offs between eco-design measures such as durability vs recyclability; in this context, product segmentation might need to be adapted depending on the eco-design measure at hand. It is also important that the product categorization, build on the lessons learned in the process of elaboration and finalisation of the upcoming A&F PEFCR Version 2.0 and efforts already put in place highlighting the need to ensure simplification as the beacon for adapting the framework to ESPR requirements.	
57	32; 298-307	<p>[...] agrees with the proposed definition for ‘technical textile’, aligned with the definition provided by the EESC.</p> <p>[...] additionally notes that currently, there are two other definitions of ‘technical textile’ in JRC reports: Developing EU-wide End-of-Waste criteria for textile waste (page 11) and Techno-scientific assessment of the management options for used and waste textiles in the EU (page 2). [...] stresses the need to have a coherent definition to avoid confusion.</p>	<p>Acknowledged.</p> <p>The JRC and the whole Commission is working to produce only one definition with the support of stakeholders in all the ongoing projects addressing this topic. The different pieces of legislation will have the same definition.</p>
58	3; 308-713	<p>3. Do you think that an initial Delegated Act on apparel textiles could disrupt the supply chain if requirements are not set at the same time also for home/interior textiles and other sub-groups of this product category? Why?</p> <p>Textile fabrics like cotton are often used in both home textiles and apparel/clothing. This means that there may be an overproduction of either materials that meet established eco-design criteria or a shortage of fabrics that meet set requirements. It will therefore be of great importance to well in advance of the entry into force announce that and preferably when other sub-groups of textiles will be covered by eco-design criteria. Also, to the extent that eco design criteria for groups excluded from the present scope are excluded due to insufficient knowledge about what kind of eco design criteria are appropriate, research activities to establish such ecodesign criteria should be carried out.</p>	<p>Acknowledged.</p>
59	3.1; Question Is there additional evidence to enrich the	<p>The industry commonly uses the below classification:</p> <ul style="list-style-type: none"> (1) Clothing (rather than Apparel textiles) (1a) Clothing made of technical yarns and/or fabrics) (2) Home/interior textiles (e.g. bed linen, towels, tablecloths, curtains) (3) Footwear 	<p>Acknowledged.</p>

ID	Stated section; stated line	Comment	Answer
	literature used for the selection criteria? Which are they?	(4) Non-clothing products made of technical yarns and/or fabrics: There are many groupings, maybe more than 10 product groups under this heading. Cleaning cloths and nonwoven products are two of them. Additionally "textile raw materials" and "technical textile raw materials" are groupings for raw materials.	
60	3.1; 317	Inclusion of fabric to the scope: It is seen that the scope of product focuses only on ready-made clothing products, without the raw materials, especially fabric. On the other hand, the eco-design to be determined is significantly related to the raw materials used in production. Although there are laboratories that can measure fabric/raw material criteria, they are mostly within the big companies, and SME's buy the fabric which are already tested by fabric producers. In other words, in the structuring of the current supply chain, fabric producers has the capacity and ability to provide this type of laboratory service. Therefore, it is recommended that especially fabric should be included in the scope of the study and the criteria to be defined.	Rejected. This PS focuses on final products. In accordance with the legal framework of the ESPR, the potential ecodesign requirements could focus, among other things, on specific characteristics of the fabrics. Following milestones will address this aspects.
61	3.1; 318-345	We support the separation of apparel and footwear, as well as home textiles and technical textiles.	Acknowledged.
62	3.1; 318	Here one of the the essential message of the Annual single market Report 2021 chapter 13 Textile ecosystem were " pursuing the goals set by the Green Deal should guide the actions for recovery and create new opportunities for growth". "Priority is for sustainable investments for sustainable product design, production processes, investments to develop recycled fibres and higher performing sustainable textiles, business models focused on resource efficiency and circularity. " In the wording there is a lack of emphasis on the novel overall sustainable material solutions, being that either virgin or recycled base. Therefore the proposal is to add "and raising novel sustainable raw material source based either on sustainable virgin or recycled material flows"	Rejected. The PS cannot change the content of the Annual single market Report 2021. The development of the PS will follow the mandatory ESPR framework.
63	3.1; 320	The description of industrial ecosystem of textiles should also recognize the development of novel fibre technologies that entail potential to reduce environmental impacts but do not necessarily fall into conventional categories.	Rejected. The PS cannot change the content of the Annual single market Report 2021. The development of the PS will follow the mandatory ESPR framework.
64	3; 321	Please add recycled fibres more clearly	Rejected.

ID	Stated section; stated line	Comment	Answer
			The PS cannot change the content of the Annual single market Report 2021. The development of the PS will follow the mandatory ESPR framework.
65	3; 336	make sure you add synthetic duvets as they are not recycled at all at this moment and the ecodesign should make this possible.	Rejected. The PS cannot change what is mentioned in other studies. The scope of home/interior textile products will be discussed within the development of the potential preparatory study focussing on this product sub-group.
66	3.1 Selection of the scope; 342	[...] corroborates that "the product group textiles and footwear is too heterogeneous for the setting of common ecodesign requirements".	Acknowledged.
67	3.1; 342-343	It is advantageous to utilize work performed in the PEFCR for apparel and footwear for a DA on textiles since it includes a thorough and systematic identification of technical and environmental aspects of particular relevance for the sector.	Acknowledged. The PS is using any available information to meet the specific project objectives within the framework of the ESPR, which is a mandatory legal framework for all products placed on the EU market. The JRC is closely following the development of the PEFCR A&F.
68	3.1 Selection of the scope; 346 Table 2	Table 2 gives an overview of "function and intended use" of apparel and other subgroups. The "functions and intended use" would benefit from refinement in line with the importance of apparel and other textiles in our lives. We suggest that a greater emphasis is placed on social aspects and inclusion, to bring discussions about apparel closer to citizens' rights and participation, and not only point towards those who have too much, but also those who actually lack what makes it possible to be active citizens. In this list there is an important category missing: Apparel is used to make the body "socially acceptable" (Entwistle, 2000; Klepp, 2008). Clothes are necessary to take part in all forms of social life. This includes professional life, sports and exercise, and all social activities. What this is depends on our age, gender and body, but also on the dress code.	Accepted. The Table 2 was updated adding a fourth intended use to textile apparel about social acceptance.

ID	Stated section; stated line	Comment	Answer
		<p>These can be both written (for example fitness centres and swimming pools have dress requirements, employers require jacket and tie, etc.), or they can be unwritten. Not having apparel suitable for the occasion means in practice that you are banned from said occasion. This perspective on clothing is important in the work to ensure underprivileged groups access to society - and to dignity (Klepp & Rysst, 2017; Laitala & Klepp, 2019a). We "properly dress" for work or dress up when we are invited to social events, not as a form of promoting "personal identity" but to show respect for the community and the ability to fit in.</p> <p>Of the existing functions listed in Table 2, We suggest a broadening of No. 1. Yes, apparel provides protection, but this does not only apply to protection from the outer environment, but also social conditions - e.g. the reflective vest provides protection in traffic and a face mask against infection. Apparel is used to both support and protect the body. The same applies to No. 2. While nakedness is not allowed, the rules for how the body should be covered are not only a matter of legislation, but also religion and culture - and they change with gender and age (Klepp & Storm-Mathisen, 2005; Storm-Mathisen & Klepp, 2006; Klepp, Laitala, & Skuland, 2019).</p> <p>References:</p> <p>Entwistle, J. (2000). <i>The fashioned body: fashion, dress, and modern social theory</i>. Cambridge: Wiley-Blackwell.</p> <p>Klepp, I. G. (2008). Clothes, the body and well-being. What does it mean to feel well dressed? (1-2008). Retrieved from Oslo: https://hdl.handle.net/20.500.12199/6038</p> <p>Klepp, Laitala, K., & Skuland, S. (2019). Uniformity without uniforms: Dressing school children in Norway. In A. Borch, I. Harsløf, K. Laitala, & I. G. Klepp (Eds.), <i>Inclusive consumption</i> (pp. 39-62). Oslo: Universitetsforlaget.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Klepp, I. G., & Rysst, M. (2017). Deviant bodies and suitable clothes. <i>Fashion Theory</i>, 21(1), 79-99. doi:10.1080/1362704X.2016.1138658</p> <p>Klepp, I. G., & Storm-Mathisen, A. (2005). Reading fashion as age: Teenage girls and grown women's accounts of clothing as body and social status. <i>Fashion Theory: The Journal of Dress, Body and Culture</i>, 9(3), 323-342.</p> <p>Laitala, K., & Klepp, I. G. (2019a). Dressing a Demanding Body to Fit In: Clean and Decent with Ostomy or Chronic Skin Disease. <i>Social Inclusion</i>, 7(1), 124-135. doi:10.17645/si.v7i1.1717</p> <p>Storm-Mathisen, A., & Klepp, I. G. (2006). Young Fashion and Adult Style: How Teenage Girls and Grown Women Accounts for the Impact of Style and Fashion on Their Personal Clothing Practices. <i>Ethnologia Scandinavica. A journal for Nordic ethnology</i>, 36, 91-106.</p>	
69	3.1; 346-350, Table 2	<p>On textile apparel, clarification is needed on the meaning of 'comply with legal obligations related to public body exposure'.</p> <p>Focus should be placed on the third element of 'self-representation'.</p>	<p>Clarified. The point (2) of the list was implemented.</p>
70	table 2; 346	<p>under apparel textiles as well as footwear : see comment 1 concerning the wording. Looking at the 'function and intended use' for Apparel Textiles, some of the given examples are within the scope of the PPE Regulation (EU)2016/425, so should not be included here as further in the document PPE are excluded. What is meant by 'public body exposure' ?. In Footwear, same comment as 1</p>	<p>Rejected and clarified. The fact that the PPE are excluded from the scope does not justify the exclusion from this list of 'function and intended use' that PPE have in common with textile apparel. Note that many PPE are specific textile apparel. The point (2) of the list was implemented.</p>
71	3.1; Table 2, 346	<p>Apparel should be clearly separated from PPE, which is meant to protect the user. This is not clearly stated in the definition. Also point 2 for apparel is not as relevant as point 3.</p>	<p>Rejected. This table reports the 'function and intended use' of these textile sub-groups. Definition of apparel textile is provided in section 2. Some textile apparel can be PPE. Regulation (EU) 2016/425 defines what PPE is.</p>

ID	Stated section; stated line	Comment	Answer
72	3; 346	Table 2. Regarding the subgroup Apparel Textiles, three uses/ functions are included. We want to highlight that Number (3) about self-representation is key on the context of eco-design to ensure the proposed measures do not hamper or reduce this third use.	Acknowledged.
73	3.1; 346	Definition of "apparel textiles": [...] recommends that the subgroup's name is changed to "textile apparel" as this is more logical and highlights the material of the apparel. Moreover, [...] supports the function and intended use (3) regarding identity and self-expression. Indeed, this function can be equally important as function (1) protecting the body.	Accepted. The name of the subgroup was change into textile apparel.
74	3; 346	It would be good to have a look at and compare with annex IVc of the Waste Framework Directive and see whether these are alligned.	Clarification is needed. The current consolidated text of the Directive 2008/98/EC does not contain an annex IVc. The stakeholder is invited to provide clarifications.
75	3; 346	Table 2 is unclear: for apparel textile it seems as if alle functions are taken into account, whereas for home/interior textiles and technical textiles only examples are mentioned.	Acknowledged. The stakeholder is invited to propose specific suggestions to improve the current description of 'function and intended use' for home/interior textiles and technical textiles.
76	3; 346	In chapter 2 (definitions): The focus for technical textile is on workwear and sport equipment, while in table 2 the focus is on cleaning products and textile absorbants. Why is workwear not mentioned here?	Clarified. Section 2 reports the definitions, wheas Table 2 reports 'function and intended use' of these sub-groups. Reporting the example of Textile cleaning products and reusable textile absorbent hygiene products does not exclude from the list of technical textiles any other product described by the definition reported in section 2.
77	3.1; 359	Please add social aspects and impact in the (circulair) textile value chain here behind the environmental impacts	Rejected. This is the legal text of the ESPR. The PS cannot change it.
78	3.1.1 Potential improvement considering ecodesign aspects in Article 5(1) of	This section lists the ecodesign /products aspects according to Article 5(1) of the ESPR, however there is no conclusion which aspects are relevant for the product group at hand. We do not see how this section supports the scope definition and rather suggest to move the consideration to e.g. task 5 as it is said that "Once the scope is defined, specific improvement potential will be assessed via environmental and economic assessments in	Rejected. Relevant product aspects of the products in the scope are assessed in Task 4. A quantitative evaluation of the product aspects will be provided in Tasks 5-7.

ID	Stated section; stated line	Comment	Answer
	the ESPR; 379 ff.	<p>the following stages of the PS. In particular, this will be performed in the following milestones addressing tasks 5 to 7 of the MEErP (see Section 1)”. However, a prioritization of the relevant aspects could help to focus the analysis in the following sections especially the analysis of the legislation, strategies and voluntary environmental labels relevant for the textile sector.</p>	
79	3.1.1.; 379-400	<p>Reg. durability:</p> <p>It is of utmost importance to critically consider what should be the estimates for durability. Currently fossil based fibers are privileged by the test methods in use. This needs to be supported by data on actual use-phase/ DoS, which could be achieved through a (digital) date-stamp in the textile product, followed by waste audits surveying the time span from production to discarding as waste.</p> <p>With out actual data, supporting the estimates, we risk privileging fibers which are motoring fast fashion AND causing health and environmental problems of a scale that is still unknown to us – namely micro-plastics – that might not actually be in use very long despite their ‘durability’.</p> <p>Regarding repairability:</p> <p>Almost all textiles are repairable, however, one of the most significant barriers to repair is the quality of textiles and the price of mere replacement. Those textiles that are of low price and quality are unlikely to ever be subject to repair eventhough they are in priciple repairable and therefore this aspect will likely mislead the evaluation of different textile products</p> <p>reg. recycled content:</p>	<p>Rejected. The analysis of these products aspects for the products included in the scope is performed in Task 4.</p>

ID	Stated section; stated line	Comment	Answer
		<p>To set standards for content of recycled material is crucial for growing a market for recycled textiles fibers which is currently on the verge of total collapse. However, the use of recycled fibers also decrease the strength of fabrics and as it is needed to increase the quality of textiles brought to the market (for instance to increase repairs) a standard for recycled content should be introduced with care and a horizontal criteria is likely not the best solution as some products containing recycled materials as these will lack technical or aesthetic qualities.</p> <p>Reg. possibility of recycling:</p> <p>Very important. Monomaterials are much more apt for recycling than mix-materials and should be privileged in this aspect.</p>	
80	3.1.1; N/A	<p>Please consider this document as reference for the state of the art of recycling. This report reflects the current lack of recycling infrastructure needed for textile to textile recycling.</p> <p>Scaling textile recycling in Europe – turning waste into value (McKinsey & Company, 2022): https://www.mckinsey.com/industries/retail/our-insights/scaling-textile-recycling-in-europe-turning-waste-into-value</p>	Acknowledged.
81	3; 379	<p>Compared to other consumer goods, toys are more strictly regulated; therefore, toy disguise costumes have more limitations than regular apparel. Although the identification of the ecodesign aspects are addressed in other milestones, we can already anticipate that several aspects, in particular repairability, upgradability, reusability and recycled content can hamper compliance with toy safety standards and requirements, as they alter the original safety presumption of the products. For what concerns the presence of substances, instead, the current TSD already allows a lower percentage than the thresholds set for regular apparel, and the upcoming TSR will go beyond the existing restriction: once the TSR will be in place, the additional requirements on chemicals when toys are intended for children under three or intended to be placed in the mouth, as well as other restrictions targeting the same type of product including on monomers in</p>	Acknowledged.

ID	Stated section; stated line	Comment	Answer
		polymeric materials, flame retardants, preservatives, aromatic amines will eventually apply to all toys.	
82	3.1.1; 380-434	<p>We support the criteria for apparel to focus on durability, ease of reparability and maintenance, and recycled content. Aspects like reliability, reusability will follow durability. The “technical quality” of the product is only part of the product, the other half is related to emotional durability. Often, fast fashion,</p> <p>Recycled content criteria are very important to boost the market for recycled fibres. This should only be done when there are sufficiently fibres of higher quality on the market, available equally for SME as well. Recycled content requirement should be made with a step-by-step approach.</p> <p>Possibility of recycling is very much dependent on the evolvement of recycling technologies. Also, almost all fibres can be recycled mechanically today.</p> <p>The overall environmental impact should also be carefully considered, although not easily calculated for textile products. There should be open databases for calculating the environmental impact if this would become a requirement. This should consider the whole manufacturing of the product and not only the extraction and cultivation of fibres.</p> <p>Presence of certain chemical substances should only be regulated through EU’s chemical regulation, not the ESPR, as this would be too burdensome for the industry. Also, all regulated chemical substances must be identifiable by standardized text methods.</p>	Acknowledged.
83	3.1.1; 384	The aim of the ESPR is to improve the environmental sustainability of products in order to make sustainable products the norm and to reduce their overall carbon and environmental footprint. If looking at material use it is highly recommended that the JRC not only limit the investigation to recycled content, but includes the assessment of	Acknowledged. The PS includes an analysis within the framework of the ESPR.

ID	Stated section; stated line	Comment	Answer
		sustainable, renewable materials as suggested in Annex 1 (ha) use or content of sustainable renewable materials, to also include materials like organic cotton or new, innovative materials in the assessment of how to reduce the carbon/environmental footprint of the products.	
84	3.1.1; 384	Generation of microplastics should be considered as one aspect.	Rejected. The PS cannot change the legal text. Microplastics release is part of the environmental impacts.
85	3.1.1; 384	<p>Here 1) "non-microplastic generative", should be considered as one item. As there is more and more studies coming evidencing how harmful microplastics are to human body, and to release more microplastics should not by any means be the recommendation or outcome of regulation (i.e Raffaele Marfella, M.D., Ph.D. Et al. 2024: Microplastics and Nanoplastics in Atheromas and Cardiovascular Events)</p> <p>here 2) promoting of durability and recycled content can be controversial for other claims listed i.e environmental impacts mentioned at row 399. As also listed later on this study the availability of natural and recycled cotton fibres (0,2-0,6Mton addition towards 2030 expected) seem not sufficient enough to meet the short term increasing demand of textile fibers,(i.e Textile exchange materials 2023 increase from 116mton/a 2022 to 147mton/a in 2030 if business continues as usual) this in mind the concern is that the only available raw material which can meet the durability and recycled content criteria in big volumes seem to be recycled synthetic fibres, which could make the microplastics issue worse.</p> <p>Here 3) In case of sustainable novel raw materials and technologies are wanted to enter the EU markets ,there should be a mechanism, which enables market entry in the early stage alternatives if the ecological impact is positive. Often the novel materials performance in the apparels needs time to develop and if there is a hard criteria set, it can hinder the novel materials entry to the market space.</p>	Rejected. The PS cannot change the legal text. Microplastics release is part of the environmental impacts. Following steps of the PS will assess the mentioned product aspects.
86	3.1.1; 385	As pointed out by this study, for example, there's no scientific evidence that better physical durability would actually reduce textile consumption and associated environmental impacts	Acknowledged. The PS will assess this aspect.

ID	Stated section; stated line	Comment	Answer
		https://clothingresearch.oslomet.no/2023/03/17/new-briefing-outlining-research-behind-the-tpr-proposal/	
87	3.1.1; 391	<p>“Presence of substances of concern” should be replaced by “Presence and release of substances of concern and microplastics”.</p> <p>Microplastics are not substances, but represent a significant concern.</p>	<p>Rejected. The PS cannot change the legal text. Microplastics release is part of the environmental impacts.</p>
88	3.1.1; 391 396 397 398	<ul style="list-style-type: none"> • ..., presence of hazardous chemicals (for humans and environment) and possibility of using benign alternatives should also explicitly be mentioned • Possibility of refurbishing should also be included under this criterium • downcycling and upcycling should explicitly be mentioned • possibility of recovery of materials and when possible and meaningful possibility of thermic recovery 	<p>Rejected. The PS cannot change the legal text.</p>
89	3.1.1; 391, 392, 393, 394, 399	<p>All of these ecodesign aspects included in Art 5(1) of ESPR are, to a greater or lesser extent, met by the Global Organic Textile Standard (GOTS). However, the JRC PS does not give consideration to standards that deliver on ecodesign aspects of interest, such as these. This is a limitation of the Study.</p> <p>The Global Organic Textile Standard (GOTS) is the worldwide leading textile processing standard for organic fibres, including ecological and social criteria, backed up by independent third-party certification of the entire textile supply chain. It is an environmental label that sits alongside the EU Ecolabel and others.</p> <p>GOTS certification builds upon four distinctive and unique features: Organic fibres produced on organic farms, Ecological and social criteria, All processing stages from raw fibre to finished products, Third party certification.</p>	<p>Rejected. The PS cannot change the legal text. The PS will establish the sustainability requirements of products included in the scope. If there are schemes capable to meet/verify these requirements, the schemes could be taken into account in the following steps of the PS.</p>

ID	Stated section; stated line	Comment	Answer
		<p>GOTS includes strict – and binding – requirements regarding ecological and social parameters, taking into consideration the need for a standard that is practicable for industrial production and appropriate for a wide range of products. Taking both aspects into account, GOTS defines organic textiles as containing a minimum content of organic fibres, being processed with the least possible environmental impact, under strict controls on natural and synthetic chemical inputs and with respect for labour conditions.</p> <p>GOTS is a dynamic standard, fosters constant progress towards the development of better textile processing methods. In this process of continuous improvement. The standard (now in Version 7.0) has been and continues to be developed in collaboration with international stakeholders, including the textile and apparel industry, chemical suppliers, organic farming and environmental organisations, workers' rights groups and labour unions. GOTS believes that a voluntary global standard, established in partnership with international stakeholder communities, ensures widespread global acceptance. In contrast to mere national standards, it also helps to remove barriers to international trade.</p> <p>The implementation of GOTS reconciles the need of the textile industry for one global standard with consumers' desire for transparency. The increasing worldwide recognition and acceptance of GOTS confirms that these needs are being met. GOTS continues to work to ensure that this common global standard satisfies the expectations of all stakeholders.</p> <p>VERIFICATION</p> <p>A standard is only as effective as it is credible. In addition to trust, verification is crucial for building credibility. GOTS entrusts verification to selected professional and independent certification bodies. The certification bodies regularly audit all parties</p>	

ID	Stated section; stated line	Comment	Answer
		<p>involved in the manufacturing of GOTS-certified textiles through comprehensive on-site inspections, in order to verify that all GOTS environmental and social requirements are met.</p> <p>Essentially GOTS is an environmental label, thus it is an option that sits alongside the EU Ecolabel, the Nordic Swan, Blue Angel, Green Button. Siegelklarheit (German Federal Ministry of Economic Cooperation and Development) has completed an assessment of several labels, including GOTS. This is available here: https://www.siegelklarheit.de/en/siegel#/textilien;sort:rating_desc . This includes several labels that are not included in the PS, and which could be included to make the PS more complete.</p>	
90	3.1.1.; 392	Greenhouse Gas and other air emissions should be seen as a priority over energy use. Focusing on energy use does not take into account the source of energy, which makes a major difference considering the ecological impacts.	<p>Rejected. The type of energy used influences the environmental impacts, which is another product aspect.</p>
91	3.1.1.; 395	<p>There are also currently no rules to specify the type of recycled input which is used in a product (post-consumer textile waste/post-consumer plastic bottles). This should be clarified as part of the revision of the Textile Labelling Regulation.</p> <p>The Parliament Resolution on the EU Strategy for Sustainable and Circular Textiles acknowledges that production of clothing from recycled bottles is not consistent with the circular model for PET bottles and that misleading claims should not be made about the recycled content in clothing based on PET. There is a risk that by mandating recycled content the amount of polyester in all products will increase, leading to increasing microplastic pollution.</p>	<p>Rejected These aspects will be assessed in future steps of the study.</p>

ID	Stated section; stated line	Comment	Answer
		Recent report by the industry initiative Textile exchange (https://textileexchange.org/app/uploads/2024/04/The-Future-of-Synthetics.pdf) acknowledged that apparel, and textile industry needs to move as rapidly as possible from polyester made from PET bottles, for several reasons: 1. Fashion industry faces a waste crisis, with vast amounts of used textiles ending up in landfills or being incinerated, especially in the global south. It's crucial to take responsibility for this waste and the environmental impact it entails. 2. Bottle-based feedstocks for textiles are not truly circular, as they utilize waste from the food and beverage industry rather than addressing industry's own waste. This approach impedes circularity efforts and may strain resources for other industries. 3. Recycled content targets set by food and beverage companies could limit the availability of inputs for other sectors, with EU legislation pushing for higher recycled plastic content targets.	
92	3.1.1; 399	Ecodesign aspects should emphasize the true environmental impacts further, i.e. the footprint of the manufacturing. Otherwise, the term "Ecodesign" may be confusing or isolated from the true impacts.	Acknowledged.
93	3.1.1; 401	<p>This section lists literature reports that address ecodesign measures for textiles. We thank the JRC for the comprehensive review and recommend additionally including references to the background reports supporting the revision of the EU Ecolabel for textiles, the Nordic Swan and the Blue Angel. These reports contain criteria proposals, including the underlying scientific rationale, which are quoted by different literature reports as a source for potential ecodesign measures.</p> <p>We encourage the JRC to make use of available research conducted by the Commission, the German Environment Agency (UBA) and Nordic Ecolabelling in the context of the preliminary study (PS) supporting the development of Ecodesign for textiles:</p> <ul style="list-style-type: none"> - Technical Report and Criteria Proposals for the revision of the European Ecolabel and Green Public Procurement (GPP) for Textiles Products (October 2013) (https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/467/documents) - Background document supporting the criteria of the Nordic Swan Ecolabel for Manufacturing of textiles, hides/skins and leather(<a 481="" 656="" 876"="" 912="" href="https://www.nordic-swan-ecolabel.org/496f12/contentassets/2a4b1e9ce1d04ad0a820553f8b716cd9/background- </td> <td data-bbox="> <p>Accepted.</p> <p>Reference to EU Ecolabel and Nordic Swan Ecolabel background document was included. Background document of Blue Angel criteria was not found.</p> 	

ID	Stated section; stated line	Comment	Answer
		<p>document_039_manufacturing-of-textiles-hidesskins-and-leather-039_english.pdf)</p> <p>- Blue Angel. The environmental Label. Textiles (DE-UZ 154) Basic Award Criteria January 2023</p>	
94	3.1.1; 401	<p>While we agree with the importance of the 6 ecodesign requirements, we advocate for the consideration of trade-offs between different eco-design requirements at the implementation stage, in order to achieve sustainability in a comprehensive manner.</p> <p>For example, incorporation of recycled content might affect the recyclability of a textile product.</p> <p>Amongst the criteria mentioned in the report, we would like to add that use of low impact materials and possibility of remanufacturing should also be considered as important ecodesign criteria.</p>	Acknowledged.
95	3.1; 401-417	<p>The listed ecodesign aspects lacks any reference to ESPR article 5.a ecodesign aspects "energy use and energy efficiency" and "environmental impacts, including carbon and environmental footprint". "Cleaner production" is one of the suggestions for reducing the environmental impact of clothing presented in Sandin et al. (2019) where the possibility to reduce garment life cycle climate impact is estimated to between 27 and 44% by switching from from current electricity supply to solar power (but maintaining amount of electricity as well as thermal energy). This indicates a substantial potential to decrease environmental impact in the supply chain.</p> <p>G.Sandin-Environmental-assessment-of-Swedish-clothing-consumption.MistraFutureFashionReport-2019.05.pdf</p>	Accepted. The text now refers to this study.
96	3; 402	<ul style="list-style-type: none"> • A holistic life-cycle approach should be a priority in analysing the sustainability of textile and textile systems. • On the issue of recycled content: it is crucial to ensure that the materials fed into the textile loops are of a sustainable origin. Unsustainable fibres do not become sustainable because they are integrated as recycled material. • There is no one size fit all solution. Actors should have the freedom to select case-by- 	Acknowledged. Product aspects reported in Article 5 of ESPR cannot be changed by the JRC. Annex I to the ESPR reports potential product parameters at point (i) "use or content of sustainable and renewable materials". The preparatory study will be developed in the framework of the ESPR.

ID	Stated section; stated line	Comment	Answer
		<p>case the best combination of fresh and recycled fibres to reach the lowest environmental footprint throughout the life cycle. Consumer and worker safety should not be compromised.</p> <ul style="list-style-type: none"> • Sustainably sourced renewable materials have a specific role in the development of a more circular economy. As losses and degradation always take place no material can be reused or recycled forever: new virgin material is always needed in the loops. Virgin renewable raw materials, such as wood, can be supplied to loops according to principles of circular economy, in a regenerative way. • Based on this reasoning, we propose that renewability should be one of the relevant ecodesign criteria. This is also why we consider that renewable content should be recognised as circular input. This is already recognised by the World Business Council for Sustainable Development and its circular transition indicators *, and should be formally integrated into the EU product policy framework. • Transparency of the fibres origin and sustainability certificates are key. This is true for both renewable and synthetic fibres. • Textile fibres originating from renewable sources have a great potential to tackle the issue of microplastics emissions. <p>*https://www.wbcd.org/Programs/Circular-Economy/Metrics-Measurement/Resources/Circular-Transition-Indicators-v4.0-Metrics-for-business-by-business</p>	
97	3.1.1.; 402	<p>The mentioned aspects of ecodesign are all technical in nature, while an important aspect of lifetime extension is also psychological. Especially in the case of apparel and footwear changing fashion styles are a major cause of premature end-of-life, even regardless of durability/reparability etc. Concepts such as design-for-attachment or timeless designs could also be regarded as important ecodesign concepts that extend product life and reduce consumption.</p>	<p>Acknowledged. The ESPR does not address the emotional durability of products. Nevertheless, the PS investigates how the user behaviour affects the environmental impacts of the products in the scope.</p>

ID	Stated section; stated line	Comment	Answer
98	3.1.1.; 403 - 417	<p>While we welcome the JRC focus on the environmental aspects listed in section 3.1.1, we believe that the PS does not take enough into account the environmental impacts of the production of textile products.</p> <p>For instance, microplastic pollution is not mentioned, yet it is well-known that synthetic materials release microplastics at every stage of their life. Microplastics are now present in human lung tissue, stool, stomachs – even the placentas of unborn babies (Antonio Ragusa et al (2021), Plasticenta: First evidence of microplastics in human placenta, Environment International vol 146). A recent study from the Plastic Soup Foundation (Do Clothes Make Us Sick? Fashion, Fibers and Human Health, 2022) concludes that inhalation or ingestion of microplastics causes chronic inflammation of the lungs (known to be a leading cause of diseases such as cancer, heart disease, asthma and diabetes) and intestinal inflammation, as well as irritable bowel disease. Furthermore, a recent European Chemicals Agency’s (https://echa.europa.eu/-/echa-s-investigation-finds-toxic-chemicals-present-in-childcare-products) study found childcare products containing substances causing cancer, genetic mutations or harming reproduction. These were most often found in synthetic polymers and textiles. In terms of the most vulnerable demographics, research from Australia (Neda Sharifi Soltani et al (2021), Quantification and exposure assessment of microplastics in Australian indoor house dust, Environmental Pollution vol. 283) looking at microplastics present in people’s homes, warned that children under six inhale around three times more microplastics than the average adult. The European Topic Centre Circular Economy and Resource Use published a report (Microplastic pollution from textile consumption in Europe, 2022) outlining potential measures to mitigate microplastics release.</p> <p>The industry’s argument that microfibres from natural fibres pose an equal environmental concern due to the chemicals used in dyeing and finishing, is questioned considering same chemicals are utilized in the processing of polyester and other plastic fibres. Thereby, this exacerbates the environmental impact associated with synthetic materials. Also the industry initiative Textile Exchange (https://textileexchange.org/app/uploads/2024/04/The-Future-of-Synthetics.pdf) recognizes that “As synthetics are the most-used fibers across the industry today, meaningful action should be prioritized to reduce fiber fragment shedding within this category specifically.”</p>	<p>Rejected.</p> <p>The environmental and health impacts of microfibers have been briefly described in Section 3.3.2. As reported in section 1 (methodology), a more accurate assessment will be performed in Task 5, when the environmental and economic analysis will be carried out.</p>

ID	Stated section; stated line	Comment	Answer
99	3.1.1; 403-405	[...] would like to highlight the importance that durability criteria is tailored according to function, intended use (defined by the manufacturer) and material composition. It is important to emphasize that the durability criteria cannot necessarily be treated generically for all types of products. Threshold values and prioritization of the criteria should be matched to the product's function, intended use and material composition, to ensure the longest possible durability for the purpose.	Acknowledged.
100	Section 3.1.3; 403 - 417	<p>While we welcome the JRC focus on the environmental aspects listed in Section 3.1.1, we believe that the PS does not take enough into account the environmental impacts of the production of textile products.</p> <p>For instance, microplastic pollution is not mentioned, yet it is well-known that synthetic materials release microplastics at every stage of their life. Microplastics are now present in human lung tissue, stool, stomachs – even the placentas of unborn babies (Antonio Ragusa et al (2021), <i>Plasticenta: First evidence of microplastics in human placenta</i>, <i>Environment International</i> vol 146). A recent study from the Plastic Soup Foundation (<i>Do Clothes Make Us Sick? Fashion, Fibers and Human Health</i>, 2022) concludes that inhalation or ingestion of microplastics causes chronic inflammation of the lungs (known to be a leading cause of diseases such as cancer, heart disease, asthma and diabetes) and intestinal inflammation, as well as irritable bowel disease. Furthermore, a recent European Chemicals Agency's (https://echa.europa.eu/-/echa-s-investigation-finds-toxic-chemicals-present-in-childcare-products) study found childcare products containing substances causing cancer, genetic mutations or harming reproduction. These were most often found in synthetic polymers and textiles. In terms of the most vulnerable demographics, research from Australia (Neda Sharifi Soltani et al (2021), <i>Quantification and exposure assessment of microplastics in Australian indoor house dust</i>, <i>Environmental Pollution</i> vol. 283) looking at microplastics present in people's homes, warned that children under six inhale around three times more microplastics than the average adult. The European Topic Centre Circular Economy and Resource Use published a report (<i>Microplastic pollution from textile consumption in Europe</i>, 2022) outlining potential measures to mitigate microplastics release.</p>	<p>Rejected.</p> <p>The environmental and health impacts of textile products are briefly described in Section 3.3.2. As reported in section 1 (methodology), a more accurate assessment will be performed in Task 5, when the environmental and economic analysis will be carried out.</p>

ID	Stated section; stated line	Comment	Answer
		According to the EEA, the EU consumption of textiles was the consumption area with the third highest impact on water and land use, and the fifth highest in terms of raw material use and greenhouse gas emissions (https://www.eea.europa.eu/publications/textiles-and-the-environment-the). It is therefore essential to set requirements on the production of textiles itself. The EU Ecolabel criteria or the Best Available Techniques (BAT) Reference Document (BREF) for the Textiles Industry could, for instance, be used as a reference document for setting mandatory requirements on production processes.	

6.2 Comments from ID 101 to ID 200

Table 5. Comments on section 3 – Scope. From ID 101 to ID 200

ID	Stated section; stated line	Comment	Answer
101	3.1.1; 403-417	The JRC lists preliminary criteria based on a first indicative investigation. [...] supports the criteria for physical durability, ease of repair and maintenance, use of recycled contents and possibility of recycling. These are considered by the industry as the optimal balance between sustainability and business competitiveness. Requirements should be measured/based on existing, well-established standards/methods, that are used by the industry.	Acknowledged.
102	3.1.1; 403-405	[...] underscores the importance of durability criteria tailored according to the function, intended use (as claimed by the manufacturer) and material composition. Specific thresholds should be based on the product categories of the PEFCR and production techniques (knitted, woven). EURATEX recommends sub-criteria focusing on fabric strength, colour fastness, and dimensional stability. Maintenance instructions should be provided to aid consumers in preserving the product's durability under the necessary conditions.	Acknowledged.
103	3; 403 - 417	While we welcome the JRC focus on the environmental aspects listed in Section 3.1.1, we believe that the PS does not take enough into account the environmental impacts of the production of textile products.	Rejected. The environmental and health impacts of textile products are briefly described in Section 3.3.2. As

ID	Stated section; stated line	Comment	Answer
		<p>For instance, microplastic pollution is not mentioned, yet it is well-known that synthetic materials release microplastics at every stage of their life. Microplastics are now present in human lung tissue, stool, stomachs – even the placentas of unborn babies (Antonio Ragusa et al (2021), Plasticenta: First evidence of microplastics in human placenta, Environment International vol 146). A recent study from the Plastic Soup Foundation (Do Clothes Make Us Sick? Fashion, Fibers and Human Health, 2022) concludes that inhalation or ingestion of microplastics causes chronic inflammation of the lungs (known to be a leading cause of diseases such as cancer, heart disease, asthma and diabetes) and intestinal inflammation, as well as irritable bowel disease. Furthermore, a recent European Chemicals Agency’s (https://echa.europa.eu/-/echa-s-investigation-finds-toxic-chemicals-present-in-childcare-products) study found childcare products containing substances causing cancer, genetic mutations or harming reproduction. These were most often found in synthetic polymers and textiles. In terms of the most vulnerable demographics, research from Australia (Neda Sharifi Soltani et al (2021), Quantification and exposure assessment of microplastics in Australian indoor house dust, Environmental Pollution vol. 283) looking at microplastics present in people’s homes, warned that children under six inhale around three times more microplastics than the average adult. The European Topic Centre Circular Economy and Resource Use published a report (Microplastic pollution from textile consumption in Europe, 2022) outlining potential measures to mitigate microplastics release.</p> <p>According to the EEA, the EU consumption of textiles was the consumption area with the third highest impact on water and land use, and the fifth highest in terms of raw material use and greenhouse gas emissions (https://www.eea.europa.eu/publications/textiles-and-the-environment-the). It is therefore essential to set requirements on the production of textiles itself. The EU Ecolabel criteria or the Best Available Techniques (BAT) Reference Document (BREF) for the Textiles Industry could, for instance, be used as a</p>	<p>reported in section 1 (methodology), a more accurate assessment will be performed in Task 5, when the environmental and economic analysis will be carried out.</p>

ID	Stated section; stated line	Comment	Answer
		reference document for setting mandatory requirements on production processes.	
104	3; 403	<p>As members of the Founding Group of Make Fashion Circular initiative of the Ellen MacArthur Foundation, and co-authors of both this report and the eco-design book from that organization; we are in the position to say that the report of “A new textiles economy” is outdated (2017). We participated in the elaboration of that report almost 8 years ago. The report was developed by the consolidation of different inputs of the industry, with the aim of raising awareness of the need to transition toward circular practices in textiles. However, the elaboration of the report didn’t follow any scientific based methodology, assessment methods to stablish eco-design criteria, neither how to measure its impacts and the trade-offs. It is a compilation of best practices to promote transition to circular economy but without an impact assessment or any trade-off analysis, both need to the development of eco-design requirements based on the ESPR framework.</p> <p>So that, we think this report is not adequate to drive conclusions about eco-design impacts and their trade-offs among product groups. Mandatory Eco-design requirements shall be based on a well-grounded technical and scientific approach based on the reality of textile manufacturing and engineering processes.</p>	<p>Rejected.</p> <p>In this specific part of the PS, the literature is screened. The PS is under development to support the policy making process.</p>
105	3.1.1; 406-409	<p>It is important to emphasize that maintenance of textile products depends primarily on the material composition of the product. We see this as an information obligation, and it should be aligned with the revision of the Textile Labelling Regulation.</p> <p>When it comes to maintenance and repair, manufactures obligations should only be to prepare the product for others to do something about it. In the end it will require the users of the product to make an active choice to repair the product and maintain it according to the instructions.</p>	<p>Acknowledged.</p>
106	3.1.1; 406-409	<p>The industry believes that ease of repair and maintenance shall encompass product-related criteria, e.g., use of standard components (zippers, buttons) that are easy to change, as well as communication on repair towards the consumer.</p>	<p>Acknowledged.</p>

ID	Stated section; stated line	Comment	Answer
107	3.1.1; 410-413	<p>It is important that regulation for chemical safety remains under REACH and there is alignment with the ESPR.</p> <p>From a circular perspective [...] is concerned about the chemical legacy, especially in post-consumer feedstock from before the implementation of ESPR. We see market surveillance as crucial to ensure that import of textile products from companies placed outside the EU, especially online platforms selling B2C, comply with REACH.</p>	Acknowledged
108	3.1.1; 410-413	<p>It is important that regulation for chemical safety remains under REACH and there is alignment with the ESPR.</p> <p>From a circularity perspective, it has to be considered that the issue of substances of concern will evolve in the future as technology for removal of impurities develops, and any regulation should take such developments into account.</p> <p>It also has to be noted that the ESPR introduces substances that are still pending classification and definition in the UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS). This means that many SoC will not be able to be identified/traced for the textile industry. This issue must be considered before any SoC requirements are established.</p>	Acknowledged
109	3.1.1; 410-413	<p>GOTS has strict hazard based criteria that prohibits substances of concern. GOTS is a voluntary sustainability standard (VSS), which is inspected, verified and certified by third-party GOTS approved control bodies. This effectively regulates the presence of substances of concern. See the Standard for detail: https://global-standard.org/images/resource-library/documents/standard-and-manual/GOTS_7.0__SIGNED_.pdf</p>	Acknowledged
110	3.1.1 Potential improvement considering ecodesign aspects in	<p>The emphasis on recycled content and recyclability within the ESPR aims to reduce reliance on virgin fibres. However, when considering their simultaneous application, are these initiatives complementary or conflicting? Textile wisdom</p>	Acknowledged.

ID	Stated section; stated line	Comment	Answer
	<p>Article 5(1) of the ESPR 6.2.7 Attitudes towards the purchase of apparel made with recycled materials; 414 – 417 and 432 - 434 1905 - 1907</p>	<p>suggests that virgin fibres, particularly those with longer staple lengths, offer superior strength compared to recycled counterparts. While synthetics may provide similar durability, concerns arise regarding the use of recycled PET (rPET) from bottles, which dominates over 90% of recycled polyester, as highlighted by the Changing Markets Foundation.</p> <p>Polyester recycling faces challenges in distinguishing textile recycled material from packaging plastic and in mitigating microplastic emissions, with some studies indicating increased emissions. Conversely, recycled natural fibres present their own hurdles; while suitable for many products, they may fall short in meeting technical and aesthetic standards in others. For instance, recycled silk, characterized by shorter staple lengths, differs significantly from its virgin counterpart known for producing fine fabrics.</p> <p>The document lacks a thorough exploration of which fibres and product categories benefit from incorporating recycled materials and why, as well as a discussion on potential adverse effects of increased usage of recycled materials.</p> <p>A recent study by the Swedish Environmental Institute IVL forecasts a mere 1.3% reduction in climate impact through large-scale recycling in the EU, a modest contribution considering the significant reductions required to address the carbon footprint of textile products.</p> <p>Consumer attitudes towards recycled materials remain largely unfavorable, with surveys indicating strong preferences for natural fibres over polyester and recycled polyester. Furthermore, political measures mandating recycled content incorporation necessitate clear benefits and consumer acceptance, both of</p>	<p>The JRC invites the stakeholder to follow the entire development of the PS. As reported in section 1, this document contains only the initial part of the analysis.</p>

ID	Stated section; stated line	Comment	Answer
		<p>which are currently lacking.</p> <p>The issue of microplastics is rapidly evolving, extending beyond laundering concerns to encompass their dispersion in the environment and potential human exposure. Plastic reduction is crucial due to its adverse health and environmental impacts, as well as its role in facilitating fast fashion and increasing fibre production.</p> <p>Questions arise regarding the potential consequences of establishing a profitable polyester recycling industry in the EU, particularly in terms of its impact on the global market dynamics and the risk of exacerbating plastic consumption due to perceptions of recycled polyester as "green" and its addition to China's already abundant supply of cheap polyester.</p> <p>References:</p> <p>Sandin Albertsson, G., Lidfeldt, M., Nellström, M., Strandberg, J., Billstein, T., Hammar, T., & Larsson, M. (2024). Life cycle assessment of mechanical textile recycling in Sweden.</p> <p>Sigaard, A. S., & Laitala, K. (2023). Natural and sustainable? Consumers' textile fibre preferences. <i>Fibres</i>, 11(2). doi:10.3390/fib11020012</p>	
111	3.1.1.; 414-417	<p>We urge the JRC to ensure attention is placed on reducing output in the sector rather than only focus on increasing the amount of recycled content in textile products for arguably small gains. The key question to be addressed is whether requirements on increasing the amount of recycled content in textile products replaces the production of virgin fibres. In a recent study (https://ivl.diva-portal.org/smash/record.jsf?pid=diva2%3A1833833&dswid=-9836 , November</p>	Acknowledged.

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		2023) from the Swedish Environmental Research Institute which analyses possible scenarios relating to a hypothetical increase in large-scale recycling, the authors state that : “as mechanically recycled fibres often rely on blending with a substantial share of primary fibres in yarn spinning, the environmental impact of the final yarn will depend on the environmental impact of the primary fibres used for blending.”	
112	3.1.1 Potential improvement considering ecodesign aspects in Article 5(1) of the ESPR 6.2.7 Attitudes towards the purchase of apparel made with recycled materials; 414 – 417 and 432 - 434 1905 - 1907	<p>There is a lot hinging on recycled content and recyclability in ESPR, in order to decrease throughput of virgin fibres. But are these two fit for purpose, when we see them together? Or are they actually in opposition? It is common textile knowledge that virgin fibres with longer staple-fibres are stronger than recycled. Synthetics will be nearly as strong but are connected to other problems with the use of rPET from bottles. According to Changing Markets Foundation, rPET represents over 90% of all recycled polyester.</p> <p>While polyester recycling has problems separating textile recycled material from that which comes from packaging plastic and the fact that the recycled material does not emit less (but in some studies more) microplastics – natural fibres have other challenges. In many products, recycled natural material will be adequate, but in others it will exceed technical and aesthetic quality. Recycled silk shares few characteristics with virgin silk primarily because virgin silk is a monofibre producing fine cloth, and recycled silk is made from shorter staple length silk. The document lacks an in-depth discussion of which fibres, product groups, etc. for which mixing in recycled material is desirable, and why. Likewise, a discussion of the possible negative effects of increased use of recycled material is missing.</p> <p>The Swedish Environmental Institute IVL recently released a study projecting that large-scale recycling in the EU would contribute to a 1.3% reduction in climate impact. “We consider this to be a relatively small contribution to the reduction needed for the carbon footprint of textile products” (Sandin et al. 2024).</p>	Acknowledged.

ID	Stated section; stated line	Comment	Answer
		<p>Consumers' attitudes towards recycled materials are not positive. JRC's own research shows that this is preferred by only 11%. (line 1906) In Norway the respondents in a study showed a high preference for natural fibres, while polyester and recycled polyester was preferred by only 2%. 35% of the respondents said they avoided recycled polyester (Sigaard & Laitala, 2023).</p> <p>Strong political measurements such as mandating incorporation of recycled content in products has to be based on clear benefits and also acceptance. Both are lacking.</p> <p>Microplastics are an area where knowledge is growing rapidly. We believe it is important to bring in the latest research that is more about the spread of microplastic in the air, and into people's bodies. We would like to warn against isolating the microplastic discussions to a laundering problem, while our children inhale microplastics as dust from their stuffed animals (recycled or not) and home textiles. Plastic reduction is important both because of plastic's health and environmental effects in themselves, but also because of plastic's important position for enabling fast fashion and for the increase in fibre production. If it were to become profitable to build up a recycling industry for polyester in the EU - what would happen in the global market? Can it be possible that such a development will increase the actual use of plastics (both because it is seen as "green" and because this recycled feedstock is in addition to what China already produces more than enough of, namely cheap polyester)?</p> <p>References:</p> <p>Sandin Albertsson, G., Lidfeldt, M., Nellström, M., Strandberg, J., Billstein, T., Hammar, T., & Larsson, M. (2024). Life cycle assessment of mechanical textile recycling in Sweden.</p>	

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		Sigaard, A. S., & Laitala, K. (2023). Natural and sustainable? Consumers' textile fiber preferences. <i>Fibers</i> , 11(2). doi:10.3390/fib11020012	
113	3.1.1; 414-415	<p>[...] support [...] suggestion on measuring criteria for the use of recycled contents by percentage (%) of recycled materials and setting targets gradually, on a step-by-step approach, based on market capacities, feedstock availability and recycling technology available to meet the durability criteria in the ESPR. We suggest that as an initial step, targets should apply only on a company level allowing the necessary flexibility in the transition. This is to ensure that companies do not have to compromise on durability and functionality on key products and allow them time to make the necessary innovation and product development, to support a gradually implementation of recycled content into their products. At a later stage, targets may apply at product level, depending on the specific category, type of fibre and function of the product.</p> <p>Even though companies must comply with recycling criteria on a company level, information requirements on recycled content, if any, could be required on a product level.</p>	Acknowledged.
114	3.1.1; 414-415	<p>[...] suggests measuring criteria for the use of recycled contents by percentage (%) of recycled materials and setting targets gradually, on a step-by-step approach, based on market capacities and feedstock availability. The industry suggests that as an initial step, targets should apply at the level of a company production allowing flexibility in the transition. At a later stage, targets may apply at product level, depending on the specific category, type of fiber and function of the product.</p> <p>[...] highlights the importance of requirements which remain technology-neutral without restrictions or prescriptions for the industry. The recycled contents requirements should allow the industry to make technology and organizational choices which are best fit for the product specificities and customer needs, as well as leaving room for advancements. Elaborating these criteria requires an inclusive and flexible approach, with consideration of any available and future recycling technologies (i.e. mechanical, thermo-mechanical and chemical), and of all applications, including in non-textile sectors.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
115	3.1.1; 414, 416	<p>Research suggests that the six most important ecodesign aspects include (1) possibility of maintenance, (2) recycled content and possibility of recovery of materials, and (3) possibility of recycling. Readiness for disassembly is a key enabling factor with a significant impact on whether these important ecodesign aspects will materialize. Even with an ideal circularity infrastructure, most apparel textiles on the market will remain too complex or expensive to repair or recycle because they are not designed for disassembly. It is crucial to consider how circularity intersects with wider sustainability aspects too. Valuable sustainable materials (which can impact durability) risk being lost in premature down-cycling or incineration if garments are not designed for circularity, which effectively impedes the recovery of materials. When defining ecodesign requirements, it is therefore fundamental to consider the underlying requirements that will enable them. In the case of possibility of maintenance, recycled content, possibility of recovery of materials and possibility of recycling, a garment's design for disassembly is key. Design for disassembly enables the preparation of textiles for upcycling, remaking (using the fabric to remake other products), and closed-loop, textile-to-textile recycling.</p>	Acknowledged
116	3.1.1; 414	<p>The environmental relevance of using recycled fibers differs substantially between different fibers and environmental aspects. Referring to table 8 (line 710), fibre production represents 12% of apparel value chain climate impact. According to Sandin [fibre bible part 2] the fibers with a significant contribution to climate impact are wool, MMCF, flax and silk. Consequently - for big volume fibers like polyester and cotton, an ecodesign requirement to use recycled fiber has low potential to decrease life cycle climate impact. On the other hand, the high fibre production share of impact on water resources and land use in table 8 are likely to relate to cotton. It should hence be considered under which prerequisites recycled content is a suitable ecodesign requirements.</p> <p>Sandin D2.12.1, Final Layout.indd (mistrafuturefashion.com)</p>	Acknowledged
117	3.1.1; 416-417	<p>[...] would like to highlight that recycling is the final step in the circular economy. It is important that the product's durability and maintenance are priorities. With that said, there is a need to create a market for recycled fibres to potentially close the loop. There must be created an incentive for the companies to use recycled fibres, both in relation to quality and price.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		Therefore, it is important to consider the ‘possibility of recycling’ already at the design phase to support the demand for recycled fibres.	
118	3.1.1.; 416-417	In addition to the three priority criteria for physical durability, ease of repair and maintenance and use of recycled contents, [...] highlights the importance of considering ‘possibility of recycling’ at design stage. It can play an important role in boosting industry investments towards a well-functioning recycling value chain that ensures necessary supply of feedstock to assist in the application of criteria on recycled contents. However, as what can be recycled develops constantly based on innovation and technological developments, rules should remain flexible and technology neutral.	Acknowledged
119	3; 416-417	Follow-up research on maximum percentage recycled content in textiles becomes available at the end of 2024. We will send you the report, once published.	Acknowledged
120	3.1.1.; 416	again addressing the possibility of recycling without the social aspects (9 points of OECD) is incomplete. Technicality is not the issue. Addressing the social aspects well and making sure that at this moment producers pay the true cost for virgin yarn will make possible that the a circular textile value chain (with Post consumer textile content!!) is possible and profitable	Rejected. The PS is developed in the framework of the ESPR, which does not have social aspects in its scope. Social aspects will be investigated in the revision of the EU Ecolabel criteria.
121	3.1.1.; 420-428	<p>Estimating product lifespan or duration of service based on physical attributes alone cannot determine whether an item of clothing will be kept and used for a long time after purchase.</p> <p>Ecodesign rules, focusing on extending garments’ life span, are a positive first step but will not automatically translate into a reduction in the volume of products sold in the EU and hence a reduction of the sector’s environmental footprint. On the contrary, more durable products may have a higher material footprint (Klepp et al. (2023), Research briefing: Input for policy development based on understanding of clothing consumption, SIFO. Retrieved from: https://clothingresearch.oslomet.no/research-briefing-on-clothing-consumption/).</p> <p>Products failing to meet physical durability standards are only one of the three main reasons why consumers stop using clothes. 63% of the clothing and</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>footwear collected as part of a study (https://wrapcymru.org.uk/resources/report/composition-textiles-wales) carried out by WRAP in Wales were still in a reusable condition and an OsloMet study (https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/) shows that only a third of clothing is disposed of due to wear and tear (i.e. low intrinsic durability).</p> <p>While increasing and improving the physical durability of products is important, only relying on this measure to address the business model of fast fashion is insufficient and may not bring the expected results. Consumers may buy the same number of products, even if the latter are more physically durable.</p> <p>The PS must reflect that it is the overproduction of cheap, low-quality goods, especially through e-commerce platforms, that consistently drives consumer demand and encourages frequent purchases of new products, ultimately resulting in shorter usage periods.</p>	
122	3.1.1 Potential improvement considering ecodesign aspects in Article 5(1) of the ESPR; 420-428	<p>The WRAP (2017) report referenced in this section is an evaluation of UK efforts to reduce the environmental impact of the sector at a national level based on product durability, among other measures. The estimation of environmental savings is based on an assumed decline in new production resulting from longer lasting products. However, the authors of the report themselves indicate that despite their efforts the associated decline in volumes expected from longer lasting products did not occur in reality. They warn that the causal relation between lifetime extension and production volumes reductions usually assumed do not apply, and there is not any evidence showing otherwise in the literature.</p> <p>The JRC research report relies on assumptions that have dominated academic literature for decades but that are increasingly being contested.</p>	<p>Acknowledged.</p> <p>The PS will address the problem with an holistic approach. We invite the stakeholder to keep on following the development of the PS.</p>

ID	Stated section; stated line	Comment	Answer
		<p>1. That clothing consumption volumes have increased because the quality is dropping and therefore products need to be replaced more often.</p> <p>2. That increasing the durability will reduce the volume of waste and new production, which can only happen if:</p> <p>2a. New products are only bought to replace items previously owned</p> <p>2b. Production volumes decisions by companies are driven by product demand</p> <p>Wardrobe studies (Laitala & Klepp,2022) and waste audits of textiles (Fashion for Good, 2022; Refashion, 2023) show that garments and accessories are massively discarded while still in good material condition, contesting assumption 1. Material failure is not a major cause of clothing disposal.</p> <p>The experience of WRAP in the UK shows that assumption 2 does not apply either. This may be because 2a and 2b do not meet reality. However, more research is needed to understand all factors at play.</p> <p>Assumption 2a was looked into in a Dutch study, which indicated that only 4% of clothing acquired was based on replacement (Maldini, 2019). Most of the literature on clothing durability assumes that replacement is a main driver for acquisition, but there have not been other field studies on the topic.</p> <p>Assumption 2b has not been thoroughly investigated, but a few case studies point to a variety of reasons behind companies' production decisions, including</p>	

ID	Stated section; stated line	Comment	Answer
		<p>their market expansion plans and the strengthening of their partnership with suppliers (see e.g. Paton, 2018). In short, the effect of product durability on production and therefore waste volumes, is unknown.</p> <p>If the assumptions above do not apply, product durability can lead to negative environmental effects associated with the use of more materials, more synthetic content, and more impactful textile processing.</p> <p>References</p> <p>Fashion for Good. (2022). Sorting for Circularity Europe. https://reports.fashionforgood.com/report/sorting-for-circularity-europe/</p> <p>Laitala, K., & Klepp, I. G. (2022). Review of clothing disposal reasons. https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/</p> <p>Maldini, I. (2019). From speed to volume: reframing clothing production and consumption for an environmentally sound apparel sector. In N. F. Nissen & M. Jaeger-Erben (Eds.), Proceedings of the 3rd PLATE conference (pp. 519–524). TU Berlin.https://doi.org/10.14279/depositonnce-9253</p> <p>Refashion. (2023). Characterisation study of the incoming and outgoing streams from sorting facilities. https://refashion.fr/pro/sites/default/files/rapport-etude/Overview_Characterisation_study_Refashion_2023_EN.pdf</p> <p>Paton, E. (2018, March 27). H&M, a Fashion Giant, Has a Problem: \$4.3 Billion in Unsold Clothes. New York Times.</p> <p>WRAP. (2017). Valuing Our Clothes: the Cost of UK Fashion. http://www.wrap.org.uk/sites/files/wrap/valuing-our-clothes-the-cost-of-uk-</p>	

ID	Stated section; stated line	Comment	Answer
		fashion_WRAP.pdf	
123	Section 3.1.1; 420 - 428	<p>Estimating product lifespan or duration of service based on physical attributes alone cannot determine whether an item of clothing will be kept and used for a long time after purchase. Ecodesign rules, focusing on extending garments' life span, are a positive first step but will not automatically translate into a reduction in the volume of products sold in the EU and hence a reduction of the sector's environmental footprint.</p> <p>Products failing to meet physical durability standards are only one of the three main reasons why consumers stop using clothes. 63% of the clothing and footwear collected as part of a study (https://wrapcymru.org.uk/resources/report/composition-textiles-wales) carried out by WRAP in Wales were still in a reusable condition and an OsloMet study (https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/) shows that only a third of clothing is disposed of due to wear and tear (i.e. low intrinsic durability).</p> <p>While increasing and improving the physical durability of products is important, only relying on this measure to address the business model of fast fashion is insufficient and may not bring the expected results. Consumers may buy the same number of products, even if the latter are more physically durable.</p> <p>The PS must reflect that it is the creation of consumer demand through the oversupplying of cheap goods, particularly through e-commerce, which continuously leads consumers to buy new products and use them for shorter time periods.</p> <p>Hence, it is also important to have targets and ways to measure the success of</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>the ESPR for textiles. We strongly call for the EU to use the material footprint as one of the indicators to measure the success of the ESPR. The EU should measure the overall material footprint of all the products covered by the delegated act on textiles to see if it decreases over time. The delegated act on textiles could include such indicator, as material footprint is likely to be listed in Annex I of the ESPR, as agreed in the latest compromise between the European Parliament and Council. If the overall material footprint does not decrease over time, targets and caps should be foreseen as well as additional measures to address fast fashion and overproduction.</p>	
124	3.1.1; 420 - 428	<p>Estimating product lifespan or duration of service based on physical attributes alone cannot determine whether an item of clothing will be kept and used for a long time after purchase. Ecodesign rules, focusing on extending garments' life span, are a positive first step but will not automatically translate into a reduction in the volume of products sold in the EU and hence a reduction of the sector's environmental footprint.</p> <p>Products failing to meet physical durability standards are only one of the three main reasons why consumers stop using clothes. 63% of the clothing and footwear collected as part of a study (https://wrapcymru.org.uk/resources/report/composition-textiles-wales) carried out by WRAP in Wales were still in a reusable condition and an OsloMet study (https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/) shows that only a third of clothing is disposed of due to wear and tear (i.e. low intrinsic durability).</p> <p>While increasing and improving the physical durability of products is important, only relying on this measure to address the business model of fast fashion is insufficient and may not bring the expected results. Consumers may buy the same number of products, even if the latter are more physically durable.</p> <p>The PS must reflect that it is the creation of consumer demand through the oversupplying of cheap goods, particularly through e-commerce, which continuously leads consumers to buy new products and use them for shorter time periods.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>Hence, it is also important to have targets and ways to measure the success of the ESPR for textiles. We strongly call for the EU to use the material footprint as one of the indicators to measure the success of the ESPR. The EU should measure the overall material footprint of all the products covered by the delegated act on textiles to see if it decreases over time. The delegated act on textiles could include such indicator, as material footprint is likely to be listed in Annex I of the ESPR, as agreed in the latest compromise between the European Parliament and Council. If the overall material footprint does not decrease over time, targets and caps should be foreseen as well as additional measures to address fast fashion and overproduction.</p>	
125	3.1.1; 420-424	<p>"considered an effective strategy to decrease the environmental impacts of this product group". Increasing the product life span reduces the environmental impact PER USE TIME, not per garment /full life cycle (or product group).</p> <p>Indirectly, the extended life cycle should reduce the purchase of new garments. So this benefit is only visible, if the environmental impacts are indeed calculated per use, not per the garment's full life cycle.</p>	Acknowledged
126	3.1.1 Potential improvement considering ecodesign aspects in Article 5(1) of the ESPR; 420 - 423	<p>Physical durability & Recyclability: Regarding physical durability as future eco-design measure, we fully support efforts to enhance the longevity of textiles as a critical part of enabling circularity. However, we deem it as critical to underscore that improving physical durability alone, without combining it with eco-design requirements on recyclability, would leave the environmental risk from waste unchanged. It would not avoid end-of-life products end up leaking into and persisting in the environment, as products would not be recyclable at their end of life. Increased durability might even risk to increase the waste impact due to its resistance to degrade in the natural environment. We therefore deem it as critical to prioritise the regulation of eco-design requirements on recyclability as a fundamental condition for enabling a circular apparel industry. Durability should be regarded as a significant minimum baseline when eco-design measures are considered. A clear prioritisation, based on respective environmental impacts, is crucial for balancing priorities effectively under the upcoming delegated act, and could read as follows:</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> ● Recyclability ● Durability ● Reusability ● Repairability <p>We strongly recommend in the subsequent steps of the preparatory study to consider eco-design measures on recyclability to prevent material leakage into the environment at the end of a product's life cycle. Sustainability hinges on both durability and recyclability; thus, design for recycling must be incentivized and rewarded comparably to durability and become mid-term a precondition for doing business within the EU market. Ultimately, the most sustainable garments are those with long lifespans that can be easily recycled into new products at the unavoidable end of their lives, aligning with the principles of durability and recyclability.</p>	
127	3; 420-421 (and others)	<p>Although in some contexts disguise costumes are passed down to younger siblings or sold second hand (so not immediately thrown away), it is not feasible to consider one-fits-all approaches to increase durability, targeting both adults and children, as the awareness on the product and its ideal use is different. The issue is even more sensible if we move the focus on specific products: if we look at (toy) disguise costumes or licensed regular apparel (i.e. linked to toys, series/films or events), rapid-changing trends out of the control of manufacturers eventually impact the durability of a product. Manufacturers can design a costume/ launch an apparel collection inspired by of the brand-newest character with the highest environmental standards; however, there is no certainty that the following year the same product can be interesting for the same end user, in particular if the latter is a child. If durability requirements passed for disguise costumes and licensed apparel, economic operators will be forced to shrink their offer, putting an industry relying on creativity in danger.</p>	Acknowledged
128	3.1.1; 421	<p>[...] support [...] comments on the importance of considering emotional durability. The ongoing work on the PEFCR reveals the existing difficulties in defining emotional durability, and how to measure it. We emphasize that, prior to including requirements in the legislation, more research is needed into a</p>	<p>Acknowledged. The ESPR does not include emotional durability in its scope. Nevertheless, the PS is investigating how the user behaviour influence the</p>

ID	Stated section; stated line	Comment	Answer
		science-based method for measuring emotional durability for different apparel categories.	environmental impacts of the consumption of products included in the scope.
129	3.1.1; 421	[...] highlights the importance of emotional durability, though reiterates that the ongoing work on the PEFCR reveals the existing difficulties in defining emotional durability, and how to measure it. [...] emphasizes that, prior to including requirements in the legislation, more research is needed into a science-based method for measuring emotional durability for different apparel categories. This work must be carried out by consumer organizations and promoted, e.g. by governmental bodies.	Acknowledged. The ESPR does not include emotional durability in its scope. Nevertheless, the PS is investigating how the user behaviour influence the environmental impacts of the consumption of products included in the scope.
130	3.1.1; 421	[...] welcomes the mention of emotional durability which is a very important aspect for the lifespan of a garment. Further, emotional durability should be enhanced by the product's capacity of being repaired and remodelled and its ease of reuse.	Acknowledged
131	3; 423-428	Trade-offs among the different eco-design requirements need to be considered before making generic impact reductions/increases. For example, line 424-425 states that increasing durability is considering and effective strategy to decrease environmental impact. However, nothing has been stated about the impact in other product features such as recyclability or recycled content. A LCA methodology to assess trade-offs is needed to ensure the overall impact reduction.	Acknowledged As reported in section 1 (methodology), Task 5 will investigate environmental and economic impacts using the Life Cycle Thinking approach.
132	3.1.1; 424-426	"It was estimated that, over the last 20 years, the use time of apparel decreased by 36%, with each product used only seven or eight times on average (Ellen MacArthur Foundation, 2017)." For this I would like to see a more valid source. This is really the core of the unsustainable textile sector, for which we really need more traceable statistics and insight.	Rejected. The JRC is reporting the current status of the literature. The stakeholder is invited to provide additional evidence if they are available.
133	3.1.1; 429-431 and 435-436	There is justified concern about the hazards of substances used, and the need for substances with a reduced 'hazard profile'. It is not correct (line 435-436) to say that "only Bauer et al (2019), OVAM (2022) and TAUW (2023) ... suggest specific criteria that would decrease the environmental footprint of apparel textiles" - as explained in comment 2, above, GOTS has strict hazard based criteria that reduces environmental and human health based risks of harm.	Acknowledged. The stakeholder is invited to provide the specific study supporting their argument.
134	3.1.1; 434	Increasing the recycled content and promoting options for repair, remake, and recyclable products requires that apparel textiles are designed for disassembly.	Acknowledged

ID	Stated section; stated line	Comment	Answer
		Textile products must be disassembled and sorted before any recycling process. Over 78% of all apparel textiles are multi-material and contain recycling disruptors such as zippers and trims that hinder recycling. Both manual and mechanical disassembly (shredding) lead up to 52% of the garment mass being cut away and incinerated or landfilled. This is due to the difficulty of disassembling and sorting multi-material apparel textiles. Compared to current solutions, Smart disassembly™ is the only method able to preserve >90% of the original fabric material in an automatic and time-efficient way, according to studies conducted by Resortecs and results documented in a Life Cycle Assessment and cost analysis, in comparison to both manual and mechanical disassembly. The output of Smart disassembly™ ensures high-quality feedstock and enhances recycling yields. This optimization of the sorting and preparing for recycling processes ensures high returns on investment and leads to positive environmental impacts.	
135	3.1.1; 435-466	<p>"Only Bauer et al. (2019), OVAM (2022) and TAUW (2023) further suggest specific criteria that would decrease the environmental footprint of apparel textiles."</p> <p>For this we just published: https://www.sciencedirect.com/science/article/pii/S0048969723024427</p>	<p>Acknowledged and clarified</p> <p>Horn et al. (2023) runs scenarios of a polyester t-shirt and reports ways to decrease some negative environmental impacts generated due to its consumption. For this reason, the study was cited in the PS.</p> <p>Since Horn et al. (2023) does not propose specific ecodesign requirements, it was not included in the sentence commented by the stakeholder.</p>
136	3.1.1; 435	Nevertheless within literature environmental footprint evaluations often narrow to measure and analyse around few key hypothesis and fundamentals, the overall sustainability would be more wise to evaluate, not only certain key parameters	Acknowledged
137	3.1.1; 437-450	<p>[...] strongly supports the Commission's initiative to investigate the development of Ecodesign for apparel textiles. Nevertheless, we would like to urge the JRC to consider a broader scope than apparel textiles.</p> <p>We acknowledge that there might be specific requirements which will need to</p>	<p>Rejected</p> <p>The PS reports the reasons to focus only on textile apparel.</p> <p>In the development of the study, the stakeholder will see how ecodesign requirements on final products affect the sound production of intermediate products used for</p>

ID	Stated section; stated line	Comment	Answer
		<p>be tailored to match the performance needs of specific functionalities (e.g. a T-shirt versus a pair of jeans). However, this consideration does not need to limit the development of Ecodesign requirements to different subgroups of apparel textiles.</p> <p>We strongly recommend investigating a modular approach for textiles which would introduce minimum horizontal requirements for intermediary textile products (i.e. fibres, yarns and fabrics), as done by the EU Ecolabel, the Blue Angel and the Nordic Swan Ecolabel. These requirements can be complemented with product specific requirements to integrate specific aspects of textiles end products (e.g. T-shirts, bed linen,...). Indeed, the Nordic Swan Ecolabel for textiles introduces minimum requirements for fabrics complemented with performance criteria tailored to different functional groups (e.g. T-shirt, bed linen...).</p> <p>Intermediary textiles are the building blocks of all textile's product categories (apparel textiles, home/interior textiles, reusable absorbent hygiene products...). Setting minimum horizontal requirements for intermediary textiles can contribute to improving the sourcing of raw materials, the manufacturing of textiles and the transparency in the supply chain. Such requirements can address environmental improvements on production processes building on the Best Available Techniques (BAT) Reference Document (BREF) and the EU Ecolabel criteria.</p> <p>A large scope of the preparatory study fits better the ambition of the EU Textiles Strategy for Sustainable and Circular, that announced Ecodesign measures for broader category groups of textiles. It would also allow building coherence and synergies with other legislations, notably the Waste Framework Directive, the development of Extended Producer Responsibility schemes, Green Public Procurement, the EU Ecolabel and the Textiles Labelling Regulation</p>	<p>the final products in the scope. The application and functionality of the final product largely affects the choice made in the PS.</p>

ID	Stated section; stated line	Comment	Answer
		<p>applying to all textiles.</p> <p>Article 5(2) of the ESPR allows setting horizontal requirements for two or more product groups displaying technical similarities allowing a product aspect to be improved. Notably, apparel textiles and home textiles might have different functionalities but they have similar composition and could benefit from minimum horizontal requirements (e.g. traceability of chemicals of concern).</p> <p>The preparatory study rightly highlights the potential for improvement of home/interior textiles and footwear through ecodesign and states that most of the ecodesign aspects listed in section 3.1.1 are valid both for home/interior textiles and apparel textiles.</p>	
138	3.1.1; 437-438	<p>A category of textile products that have been missed in this PS, and should be included, are Personal Care Products (including female hygiene products). These products can cause toxic reactions and are in close and intimate contact with the body. GOTS standard includes these, and organic feminine hygiene products are in demand, not only by those women that suffer from toxic exposure.</p>	<p>Rejected The PS includes reusable textile absorbent hygiene products in the technical textiles.</p>
139	Section 3.1.1 and 3.2 and 3.2.2; 443-444 and 500-503, 551-562	<p>The functionality of products may be used as a criterion to define product subgroups with the textiles and footwear product group. Nonetheless, the fact that products perform different functions does not prevent the assessment of the possibility of introducing horizontal ecodesign requirements across subgroups, as provided for in Article 5(2) of the ESPR, when two or more product groups display one or more similarities allowing a product aspect to be effectively improved based on common ecodesign information or performance requirements. This is especially relevant for apparel and home textiles, which may have different functions but similar material composition. The examples mentioned in lines 558-562 are considered technical textiles, not home textiles.</p> <p>We recommend investigating a modular approach that introduces minimum horizontal requirements that are relevant for specific materials/fibre types and</p>	<p>Rejected In the development of the PS, the stakeholder will see how the final application of of a product strongly affects the demand of specific fibres, yarns and fabrics. Horizontal requirements will be possibly developed by different studies.</p>

ID	Stated section; stated line	Comment	Answer
		<p>hence could apply to intermediary products as well. For instance, some of the tests mentioned in Table 48 are used to test the fabrics. It is crucial that this first building block of requirements is fibre-specific and not fibre-neutral. It is vital to improve the performance of each fibre type rather than pushing out of the market the most delicate fabrics – which might on the other hand have a considerable duration of service – in favour of synthetic fabrics. In addition to these horizontal requirements set at material/fabric level, there can be specific requirements which will need to be tailored to match the performance needs of specific functionalities (e.g. a T-shirt versus a pair of jeans) or that will need to be tested on the final product. This modular approach will also be helpful in assessing the possibility of setting horizontal requirements that will cover home textiles and potentially footwear.</p>	
140	Section 3.1.1 and 3.2 and 3.2.2 Scope; 443-444 and 500-503, 551-562	<p>The functionality of products may be used as a criterion to define product subgroups with the textiles and footwear product group. Nonetheless, the fact that products perform different functions does not prevent the assessment of the possibility of introducing horizontal ecodesign requirements across subgroups, as provided for in Article 5(2) of the ESPR, when two or more product groups display one or more similarities allowing a product aspect to be effectively improved based on common ecodesign information or performance requirements. This is especially relevant for apparel and home textiles, which may have different functions but similar material composition. The examples mentioned in lines 558-562 are considered technical textiles, not home textiles.</p> <p>We recommend investigating a modular approach that introduces minimum horizontal requirements that are relevant for specific materials/fibre types and hence could apply to intermediary products as well. For instance, some of the tests mentioned in Table 48 are used to test the fabrics. It is crucial that this first building block of requirements is fibre-specific and not fibre-neutral. It is vital to improve the performance of each fibre type rather than pushing out of the market the most delicate fabrics – which might on the other hand have a considerable duration of service – in favour of synthetic fabrics. In addition to these horizontal requirements set at material/fabric level, there can be specific requirements which will need to be tailored to match the performance needs of specific functionalities (e.g. a T-shirt versus a pair of jeans) or that will need to</p>	<p>Rejected</p> <p>In the development of the PS, the stakeholder will see how the final application of of a product strongly affects the demand of specific fibres, yarns and fabrics. Horizontal requirements will be possibly developed by different studies.</p>

ID	Stated section; stated line	Comment	Answer
		be tested on the final product. This modular approach will also be helpful in assessing the possibility of setting horizontal requirements that will cover home textiles and potentially footwear.	
141	3.1.1 Potential improvement considering ecodesign aspects in Article 5(1) of the ESPR; 448	<p>“The literature review showed that apparel textiles, but also to some extent home/interior textiles and footwear, have the potential for improvement under various ecodesign aspects. In the following milestones, the PS will assess all the ecodesign aspects set out in Article 5(1) of the ESPR.”</p> <p>In the future the JRC team can count and consider [...] expertise in ecodesign aspects and LCA/PEF methodology application to reduce products environmental impact. Please consider [...] participation in the Ecodesign future work.</p>	Acknowledged
142	3.1.2; 451	Our Federation calls for further economic indicators at European level by market segment and the associated environmental impact of the textile industry	Acknowledged As reported in section 1 (methodology), the last tasks of the PS will include the environmental and economic assessment of the products in the scope. Additionally, the PS will be followed by an Impact Assessment.
143	3.1.2; 457-465	Apparel textiles represent the highest market share of the four subgroups of textiles and footwear listed in Table 3. However, this fact cannot lead to conclude that the market share of the other subgroups presented in Table 3 (home/interior textiles, footwear and technical textiles) are not relevant enough to be addressed by Ecodesign measures. In line with the findings of the EU Strategy for Sustainable and Circular Textiles, we recommend underlying that the overall production, import, export and apparent consumption of the four subgroups are significant, while the figures for apparel textiles are higher.	Rejected This PS is the pilot study in the ESPR framework. Other studies in the same framework will address the other subgroups of the textile products.

ID	Stated section; stated line	Comment	Answer
144	3.1.3; Workshop Question – literature missing re. to selection criteria?	<p>There is missing literature about environmental impacts (LCA based) of each ecodesign criteria and the trade-offs between them. Durability can hamper recyclability and recycle content can hamper pilling tests. What is the scientific based methodology to asses impacts. All literature mentioned in the report is not tackling the impact scientifically stating how to allocate it to each criterion.</p> <p>More scientific based reports are needed, like EEAs for the literature criteria – EMF or ECOS reports are not LCA based or scientific oriented. The report states that (line 496) apparel is the most investigated group, but only 108 studies performed by the same 2 professors at HK University are referred. More robust scientific evidence to prove impacts and prioritize actions is of essence.</p>	<p>Rejected</p> <p>The stakeholder is invited to provide more reference if they are available. As described in section 1 (methodology), the last tasks of the PS will include the enronmental and economic assessment of the products in the scope. The JRC will provide scientifically based conclusions.</p>
145	3.1.3 Environmental impacts and waste generation across the value chain; 474 - 476	<p>[...] confirms that "fashion" can be understood as including the subgroups apparel textiles and footwear.</p> <p>Totally support:</p> <p>"the authors understand that fashion includes leather and fur apparel, which are not part of this PS in view of its focus on textile products according to the definition under the TLR."</p> <p>Please consider the following suggestion to the above sentence:</p> <p>"the authors understand that fashion includes leather and fur apparel and footwear, which are not part of this PS in view of its focus on textile products according to the definition under the TLR."</p>	<p>Rejected</p> <p>The text already reports that footwear is a fashion product. This is done in the sentence right before the one reported by the stakeholder.</p> <p>"The same literature refers to 'fashion', which forms a major component of the product group 'apparel and footwear', and it can be understood as including the subgroups textile sapparel and footwear."</p>
146	3.1.3; 475	<p>It would be worthwhile mentioning the environmental impacts and waste generation of leather and fur, in scale/in comparison to the impacts of textile mentioned in the report. The reason is that it cannot be minimized that these</p>	<p>Acknowledged</p> <p>The stakeholder is invited to provide reference to studies supporting their arguments. The</p>

ID	Stated section; stated line	Comment	Answer
		<p>products also cause an environmental impact, which is very much part of the fashion industry.</p> <p>Important to include an outline how much of footwear is covered by textiles if leather is excluded to understand the scope of the report.</p>	<p>authors could not find more references in the literature.</p> <p>The scope of the study is described in section 3.2.</p>
147	3.1.3; 475	<p>BEUC strongly recommends including leather and fur apparel in the scope of this preparatory study, in light of their high environmental footprint.</p> <p>The PS could refer to the ongoing evaluation of the Textiles Labelling Regulation, which is assessing the potential inclusion of leather and fur apparel in its upcoming revision. In addition, the PEF Category Rules for apparel and footwear do not exclude leather and fur.</p>	<p>Rejected</p> <p>Leather and fur are not textile products. These products can be addressed by other studies within the framework of the ESPR. The stakeholder is invited to provide reference to studies supporting their arguments. The authors could not find more references in the literature.</p>
148	3.1.3; 475	<p>[...] welcomes the exclusion of fur apparel of the PS, following the definition of textile product in the Textile Labelling Regulation. Indeed, textiles and fur have very different supply chains and attributes and thus should be in two different product groups.</p>	<p>Acknowledged</p>
149	3.1.3; 478-480	<p>Table 4 lists available research on the environmental impacts of different subgroups of the textiles and footwear product group. The analysis might implicitly suggest that fewer research availability for home/interior textiles, footwear and technical textiles makes these subgroups less relevant for Ecodesign measures compared to apparel textiles. However, the availability of reports outlining the environmental impacts of the textile sector overall (including home/interior textiles, footwear and technical textiles in addition to apparel textiles) is quite significant.</p> <p>In addition, the EU Textiles Strategy for Sustainable and Circular Textiles indicates that an initial assessment by the Commission showed that household textiles in addition to personal textiles would be prioritised for Ecodesign measures, due to their high potential for improvement and impacts in terms of environmental sustainability. The EU Ecolabel and other national ecolabels have</p>	<p>Rejected</p> <p>The literature shows the higher importance to address apparel. Other studies within the ESPR framework will address the other subgroups of textile products.</p>

ID	Stated section; stated line	Comment	Answer
		addressed different textiles and footwear subgroups due to their environmental impacts and improvement potential.	
150	3.1.3 Environmental impacts and waste generation across the value chain; 478	<p>[...] recognises for the footwear subgroup more research and innovation is necessary and confirm ongoing works and new proposals to study and deploy state-of-the art, globally sustainable solutions, that promote new business oportunities, jobs and safe circular materials/products.</p> <p>One example is BioShoes4All portuguese PRR project (https://bioshoesforall.pt/ more technical information will be available in the near future).</p>	Acknowledged
151	3.1.3; 482	<p>Table 4: The literature reviewed does not take account of the reduced environmental impact of organic` fibre production (on farm) and organic fibre processing - fibre to finished product. This significantly reduces the environmental impact of Apparel Textiles, Home/interior textiles and Textiles in general. including personal hygiene products (missing from the PS.</p> <p>The PS should highlight this and should commission further research on on the impact of organic fibre production and organic fibre processing to the finished apparel, home textile or personal care products.</p> <p>ORGANIC FIBRE PRODUCTION</p> <p>A textile product carrying the GOTS label must contain a minimum of 70% certified organic fibres, a product with the label grade grade 'organic' must contain a minimum of 95% certified organic fibres.</p> <p>Organic fibres are natural fibres grown without the use of synthetic pesticides</p>	<p>Rejected.</p> <p>Table 4 has a different objective that serves the selection of the scope.</p> <p>In Task 5, the PS will investigate the environmental and economic impacts of products and provide an analysis of their contribution.</p> <p>Social aspects are not addressed in the PS because they do not belong to the scope of the ESPR. The PS is developed under the framework of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
		<p>(such as insecticides), or herbicides and GMOs (Genetic Modified Organisms) according to the principles of organic agriculture. Organic agriculture is a production process that sustains the health of ecosystems, soils and people. Organic farming is, by definition, regenerative.</p> <p>Organic fibre production is not directly covered by the GOTS certification system, as GOTS itself does not set standards for organic fibre cultivation. Instead, the cultivation of organic fibres is under the scope of organic farming standards, many of them defined by national governments.</p> <p>For organic fibre production, a certification to the IFOAM Family of Standards for the relevant scope of production is required. IFOAM has its own accreditation system. The standards approved under the IFOAM family of standards are officially endorsed as organic and include both private and government regulations.</p> <p>More detail on the ecological and social criteria included in GOTS are provided below.</p> <p>It is important to note, in the context of the JRC PS, that the PS focuses only on environmental issues. GOTS believes that social issues are just as important in the global textile sector. It is also the case that it is the social issues that often motivate consumer mistrust and concern about the products they buy. Hence, we go into some detail on the social criteria.</p> <p>ECOLOGICAL AND SOCIAL CRITERIA IN FIBRE PROCESSING AND MANUFACTURE</p>	

ID	Stated section; stated line	Comment	Answer
		<p>OF ORGANIC TEXTILE PRODUCTS</p> <p>To build a truly sustainable textile industry, GOTS evaluates the processing and manufacturing of textiles on the basis of both, environmental and social criteria. This means assessing everything from the chemical inputs being used to the ethical treatment of workers. To become GOTS certified, it is mandatory to meet all of the criteria.</p> <p>The GOTS Standard consists solely of mandatory criteria. In addition the GOTS Manual provides interpretations and recommendations for implementation. The standard covers the processing, manufacturing, packaging, labelling, trading and distribution of all textiles made from at least 70% certified organic fibres. There are two GOTS label-grades: 'organic' requiring a minimum of 95% organic fibres and 'made with organic materials' requiring at least 70% organic fibres.</p> <p>Key Criteria for Processing and Manufacturing</p> <p>ENVIRONMENTAL</p> <ul style="list-style-type: none"> > Separation from conventional fibre products and identification of organic fibre products > Use of GOTS approved colourants and auxiliaries in wet-processing only > Processing units must demonstrate environment management, including wastewater treatment 	

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> > Technical quality parameters for colour fastness and shrinkage for finished goods required > Restrictions on accessories > Restrictions on additional fibre materials > Environmentally hazardous substances prohibited in chemical inputs > Evaluation of toxicity and biodegradability for chemical inputs <p>SOCIAL</p> <ul style="list-style-type: none"> > The Standard sets requirements concerning working and social conditions that are equivalent to those of leading social sustainability standards. GOTS social criteria, based on the key norms of the International > Labour Organisation (ILO), United Nations Guiding Principles on Business and Human Rights (UNGPs) and Organization for Economic Cooperation and Development (OECD), must be met by all processors, manufacturers and traders. They must have a social compliance management system, with defined elements in place to ensure that the social criteria are met. <p>Some of the sections from social criteria under GOTS Version 7.0 are highlighted here. For more details, see the latest version of the GOTS Standard.</p> <ul style="list-style-type: none"> > Employment is freely chosen > Freedom of association and collective bargaining > Child labour shall not be used 	

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> > No discrimination is practised > Occupational health and safety (OHS) > No harassment and violence > Remuneration and assessment of living wage gap > Working time > No precarious employment is provided > Migrant workers 	
152	3; 482	Table 4. It is not clear the level of granularity. Could you please clarify is the 108 studies for apparel textiles are from different authors and with different approaches or just related to (i) Cai and Choi and (ii) Munasinghe et al?	<p>Clarification needed by the stakeholder</p> <p>The comment is not clear to the authors. The aim of Table 4 is to show that apparel was more investigated than other subgroups. For apparel, Table 4 reports two studies which are reviews of numerous studies available in the literature. Table 4 reports that Cai and Choi (2020) reviewed 108 studies; while Munasinghe et al. (2021) reviewed 57 studies. Munasinghe et al. (2021) reviewed part of the studies reviewed by Cai and Choi (2020).</p> <p>The authors of the PS do not understand how the authorship and the approach used by the studies in the literature can affect the aim of the Table 4.</p>
153	3.1.3; 485-498	The analysis of Table 5 attributes most of the environmental impacts of the textiles sector to apparel textiles. However, while in relative terms the impacts of apparel textiles are the biggest, in absolute terms the impacts attributed to home/interior textiles and footwear remain significant. They represent between more than half and three quarters of the total values attributed to apparel textiles.	Acknowledged

ID	Stated section; stated line	Comment	Answer
154	3.1.3; 487-489	<p>It says "most of the impacts generated come from apparel textile", which is not necessarily true when you look at the numbers in the table. In the case of GHG it is 50% and all other impact categories, less than 50%. This does not entail "most of the impacts"</p> <p>489: Here it is also important to understand if leather is included in footwear? Particularly for land use.</p>	<p>Rejected</p> <p>The entire sentence refers to the location of where the emissions occur. When focussing on GHG emissions, Table 5 reports that 75% occur outside EU.</p> <p>The authors of the PS understand that leather is included in the quantification of impacts generated by footwear.</p>
155	3.1.3; 489	<p>Table 5 states the attribution of impacts inside and outside EU, about, among others, raw materials. The report however fails to showcase the reality – the textile industry is a global industry and is fully dependent on global supply chains for access to fibers and materials. We once more stress the utmost importance of data verification by the European Commission to ensure capacity.</p> <p>Textile Exchange global fibre market report (2022), states that global fibre production is 116 million tons a in 2023, where synthetic fibres represent 75,5% (polyester 63%) and plant fibres 32% (cotton 22%). It means that main raw materials are cotton and polyester and together represent 85% of total textile fibres consumed.</p> <p>Cotton: main production countries are China, India, Pakistan and Australia, (68% of world production). Rest USA and Brazil mainly) source Textile Exchange material markets report 2023). Polyester is the 63% of global production and this production is located in China (58%), South Asia (13), India (9%) and USA (4%). Data for Wood Mackenzie Polyester market analysis. Therefore, textile is dependent in a 85% of Asia raw material.</p> <p>Polyester represents 63% of raw materials (85% produced in Asia) and only</p>	<p>Clarification needed by the stakeholder</p> <p>The authors of the PS do not understand the comment, which is supposed to be related to Table 5 reporting the environmental impacts of the supply chain.</p> <p>The whole section 5 of the PS addresses the complexity of the global supply chain of the textile apparel.</p>

ID	Stated section; stated line	Comment	Answer
		14% of it is recycled and it is 100% RPET, as there is not textile-to-textile recycled polyester available at scale. Asking T2T recycled polyester in the short term is not feasible as the state of the art does not allow it and moreover, from the strategic point of view. Europe cannot have resilient supply chains if there is not open strategic autonomy to diversify those supply chains with incentives and investments plans to produce RPET and other new and recycled fibres in Europe.	
156	3.1.3; 489	Table 5 is a completely different scope than the other LCA based studies. Its difficult to see the relevance of this table, where, if I correctly understood, the previous studies relate to LCAs and also the product-level scope after this part (section 3.2.1)	Rejected Table 4 aims to show the number of studies addressing specific textile products subgroups. Table 5 reports the results of the EEA about the Environmental impacts related to the supply chain. They are two different pieces of information reported in the section.
157	3.1.3; 491-495	<p>In lines 484-488, a study is mentioned that states that most of the environmental impacts related to upstream supply chains occur outside the EU and are due to apparel textile production. The study in line 491-495 highlights that 86% of the waste generated in the EU is post-consumer waste.</p> <p>However, what is not considered is the environmental impact of textiles in the downstream supply chain outside the EU. The impact of post-consumer waste is also mentioned in lines 646-658 (Generation of waste). The impact in the EU is underlined with numbers (textiles in landfills was estimated to release about 2000 tons of hazardous sub-stances annually in the EU). However, the impact of second-hand trade, for example to sub-Saharan Africa, should be highlighted. Most of the clothes shipped to Africa are made from synthetic fibers. As there is no infrastructure for disposing of these quantities, they exacerbate the plastic waste crisis in these countries. The official landfills have been overflowing for years. Some of the textile waste is openly incinerated or clogs rivers. This leads to health problems for local residents, local water systems are polluted or flooded and landfills have become fuel for fires. Microfibers are released from the fabrics, end up in rivers and oceans and are mistaken for food by marine life and waterfowl. However, they can also be transferred into the human food chain (see source Green-peace: How fast fashion is fuelling the fashion waste crisis in Africa - Greenpeace Africa,</p>	Acknowledged. The PS mention this problem in section 5.6, which describes the value chain of the products in the scope. The authors of the PS did not find any piece of literature quantifying the impacts due to the export of second-hand and textile waste. The environmental and economic assessment in Task 5 of the PS will include the fate of textile waste exported to third countries.

ID	Stated section; stated line	Comment	Answer
		https://www.greenpeace.org/africa/en/blog/54589/how-fast-fashion-is-fuelling-the-fashion-waste-crisis-in-africa/ .	
158	3; 496-498	Apart from the EEA 2022 study, Could you please explain what are the LCA studies supporting the remaining literature reviewed? Based on what it is claimed the apparel subgroup is the most impactful if the other subgroups have barely studies available?	Clarified The choice is based on the study from the European Environment Agency. The stakeholder is invited to share potential alternative references that state a different results.
159	3.1.3; 497	Here again, does the phrase "most impactful" refer to less than 50%?	Rejected Apparel generate alsways the largest part of negative impacts compared to footwear and home/interioir textiles.
160	3. Scope; 499 - 562	<p>We support that the product categorization is aligned with PEFCR and call upon using NACE coding as the reference for all EU legislation such as waste, consumer and customs legislation.</p> <p>Please note that PEFCR technical secretariat has further established a segmentation between voved and knitted fabrics to better distinguish among the functionality of the products. Special attention should be put on denim when setting durability criteria.</p> <p>Another concern is alignment with PRODCOM codes to ensure the link to customs.</p> <p>To our understanding, to meet the main objectives of the ESPR, exceptions must be few. If not, there is a risk that the ESPR will be watered down and not significantly reduce negative environmental impacts nor improve the functioning of the internal market.</p> <p>Only products with a purpose that cannot be fulfilled when complying with eco-</p>	Acknowledged The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.

ID	Stated section; stated line	Comment	Answer
		<p>design requirements should be exempted from the ESPR.</p> <p>These products can be exempted as they must be able to operate under specific, extreme, and harsh conditions, or because ecodesign requirements will negatively affect human health and safety. In the ESPR proposal, defense equipment, space technologies, and medical devices are listed as such rare exemptions.</p> <p>As the purpose of apparel and footwear products does not come close meeting these exceptions, sportswear, leisure, and fashion products should all be within equal scope of the ESPR regulation.</p> <p>This includes information requirements referred to in Article 7(1) as:</p> <ul style="list-style-type: none"> • Technical specifications are available for sportswear, leisure, and fashion products in relation to the essential requirements included in Article 10. • No other frameworks set ecodesign requirements or includes a system for the digital provision of information related to fashion and sportswear textile products. <p>Importantly, this scope will also ensure legislative consistency with the Waste Framework Directive (WFD). In WFD, sportswear, leisure, and fashion products fall within the scope of the definition of textile articles of apparel and clothing accessories and thereby the Extended Producer Responsibility and the Eco-Modulation of fees</p>	

ID	Stated section; stated line	Comment	Answer
161	3.2; Question Do you think the scope is correctly defined?	[...] agrees to include all sportswear, leisure and fashion products equally in the scope of the ESPR.	Acknowledged
162	3.2; 499-503	The JRC states that the products in the study should be sufficiently homogeneous in terms of function, material composition, chemical composition and technologies used. [...] supports this approach.	Acknowledged
163	3; 499	Clarification is needed what is included and excluded in the scope and why. It is vague and unclear.	Clarification from the stakeholder The stakeholder is invited to explain what is “vague and unclear” in the current version of section 3.2.
164	3.2; 499	<p>Apparel supply chain has been globalized so its classification should be consistent with existing trade activities. Though based on the concept of merchandising, we could see product categories utilized for retail product assortment in stores and e-commerce, but remains not standardised.</p> <p>In creating standardised classification, it is necessary to ensure consistency with the HS code, the most commonly supported product classification and managed standard by the World Customs Organization. Therefore, we believe that it is necessary to have a complete explanation with table between the classification adopted here and HS codes.</p> <p>PS is quoting product category proposed by PEFCR AF. Cascale, the Technical Secretariat coordinator of PEFCR AF, developed Higg Index and their webpage introduces different product category for their Higg Product Module;</p> <p>https://howtohigg.org/higg-product-module/new-product-assessment/product-category/</p> <p>We hope to clarify the context of ten categories for apparel and three for shoes not shown on the webpage of PEF Apparel & Footwear.</p> <p>Also, there is another sample as CottonWorks™ shown below;</p> <p>https://www.cottonworks.com/wp-content/uploads/2017/11/Section_2-P1-5.pdf</p>	Acknowledged The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.

ID	Stated section; stated line	Comment	Answer
		<p>Workwear is different from clothing because its suppliers are sometimes different, and the market consists of leasing and rental rather than sales, so it is necessary to set it up as a separate item.</p> <p>Uniforms are delivered to their users by leasing, and they could not be purchased freely. General-purpose items also exist as workwear, so it is necessary to clarify the definition of terms.</p>	
165	3.2; 499-562	<p>6. Do you think the scope is correctly defined? How can it be better described?</p> <p>The reasoning behind the inclusion criteria is sensible, as is alignment of the categories with those of the PEFCR apparel & footwear.</p> <p>When defining the scope or sub-categories of products, it might also be worth checking REACH restrictions to determine whether the terminology can be aligned. In this regard, it appears important to follow the work on skin sensitizers and PFAS, which is not finalised yet.</p>	<p>Acknowledged</p> <p>The PS will investigate substances of concern in the framework of ESPR. The potential interaction with prescription under REACH will also be addressed in the following steps of the PS.</p>
166	3.2; 500 - 529	<p>[...] has made its comments available to JRC via email.</p> <p>[...] fully supports the EU's ambition to tackle the negative environmental impacts of textile products across their lifecycle through setting of ecodesign requirements via the new Ecodesign for Sustainable Products Regulation (ESPR) framework, as envisioned by the EU Strategy for Sustainable and Circular Textiles. Enhancing the lifecycle performance of textiles across various product categories, including apparel, interior, footwear, and technical textiles, is essential for advancing the objectives of the EU Green Deal and the Circular Economy Action Plan. The imperative for prompt legislative action in this field has been further reinforced by ESPR, which now directs EU policymakers to prioritize establishing ecodesign requirements for textile products.</p> <p>While acknowledging the rationale for initially focusing on apparel textiles in the ongoing preliminary study conducted by the Joint Research Centre (JRC), we urge both the Commission and the JRC to consider prioritizing the inclusion of interior textiles, particularly flooring solutions such as carpets used in offices, public buildings, residential spaces, and transportation, in the first Ecodesign Work Plan scheduled for adoption in 2025. This aligns with the objectives</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
		<p>outlined in the Sustainable and Circular Textiles Strategy, which identifies carpets as one of the textile categories offering significant potential for environmental improvement. Additionally, ESPR mandates the Commission to prioritize the establishment of ecodesign requirements for all textile products, not solely limited to apparel items.</p> <p>The need for prioritization of carpets as a product category, among other textiles, is exacerbated by the current situation the EU is facing:</p> <ul style="list-style-type: none"> • Europe discards approximately 1.5 million tonnes of carpets annually – while the demand for carpets amounts to 1.8 million tonnes per year. Around 60% of carpets in Europe end up in landfills, with the rest typically being incinerated, and only a few percent recycled, due to many barriers such as carpet design, collection, contamination and presence of toxic substances, resulting in increased CO2 levels, contamination of water, air and soil. • The transition from linear economic models and unsustainable waste disposal structures in the sector must start immediately: while the sector has implemented different measures to improve the environmental lifecycle performance of carpets, such as the development of the GUT-PRODIS product passport, more must be done to tackle the challenges related to design and elimination of harmful substances <p>To overcome these challenges, ecodesign requirements for carpets should be set as a priority. [...] urges the Commission and JRC to introduce measures such as transparent reporting on recycled content, limiting and tracking materials that hinder safe recycling, increasing the amount of recycled material, and providing value chain information to ensure efficient sorting, collection, and separation along with enshrining end of life design principles, for flooring solutions products in the same timeframe as measures for apparel products.</p> <p>We remain available to provide the Commission and JRC with additional information about [...] and our comments regarding the scope of the preliminary study.</p>	
167	3.2; 500-503	[...] supports the setting of Eco-design requirements for product subgroups with homogeneous characteristics, as proposed in this paragraph of the study. The whole group “Textiles” is highly heterogeneous, including products with significant differences on materials (e.g. textile fibers vs leather), finishings,	Acknowledged

ID	Stated section; stated line	Comment	Answer
		functions, performances and compositions that would made impossible to set common rules granting a high level of sustainability or circularity for all the products.	
168	3.2; 500	Need for further clarification on the inclusion or not / treatment of leather.	Rejected Textile products are defined in section 2, which reports definitions. Since leather does not contain textile fibres, it is not included in the scope of the scope of the PS.
169	3.2; 500	The [...] welcomes the acknowledgment by the JRC that all products in the scope of the PS should be sufficiently homogeneous in terms of function, material composition, chemical composition and technologies used.	Acknowledged
170	3.2; 501	Homogeneity on chemical composition and technologies sounds as a too limiting scoping criteria and may work against textile innovation that brings the same function and performance in a textile product but with lower ecological impacts.	Rejected The PS is developed so that technology development is promoted and never limited. In the following steps of the PS, the stakeholder is invited to flag any possible limitations on technological development that the authors of the PS will not be able to foresee.
171	3.2.1 Products included in the scope; 504ff. & 511	<p>@ line 504 ff. We support the approach of focusing on apparel. We welcome the fact that the definition of “textile product” is based on the Textile Labelling regulation (EU) 1007/2011. The definitions used should be precise and consistent with definitions in other EU legislative acts. The definition “apparel textiles” should therefore be reviewed, to ensure that there is no overlap with personal protective equipment. Therefore, we kindly ask JRC to define more specific – or give examples – which textile products are meant with the term “Workwear apparel textiles not excluded from scope (as per section 3.2.2)” (Line 524, also 517-519).</p> <p>In addition, we would like to point out the following: The scope of the targeted amendment of the Waste Framework Directive (see: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52023PC0420) is tex-tile, textile-related and footwear products listed in Annex IVc and for the eco-modulation as stipulated in Article 22c, it is referred to the ecodesign requirements and their measurement methodologies. To ensure that there is no legal loophole here, for footwear it should be clearly emphasized that an</p>	Partly accepted The text reports in a footnote some examples of workwear includd in the scope. The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.

ID	Stated section; stated line	Comment	Answer
		<p>additional preparatory study will be addressed soon.</p> <p>Although we do not consider home textiles as a priority group for ecodesign requirements, those home textiles, which fall within the scope of Article 22a of the Waste Framework Directive, have to be included in the scope of the PS for realizing the eco-modulation under the Waste Framework Directive.</p> <p>@ line 511: This section refers to the PRODCOM codes of products included in the scope of the PS whereas other legislative proposals related to textiles, namely the latest version of the ESPR [1] and the targeted amendment of the Waste Framework Directive (COM/2023/420) [2], refer to the combined nomenclature (CN). The CN is based on the Harmonised Commodity Description and Coding System (HS), commonly referred to as the Harmonised System, which is an international system to classify goods developed by the World Customs Organisation (WCO).</p> <p>Though PRODCOM codes have a complete reference to the CN codes, which means that they can be translated, with some exemptions being cases where PRODCOM codes are more detailed than CN codes, we strongly suggest using HS codes instead of PRODCOM positions because, unlike PRODCOM codes, HS codes are incorporated in the processes of economic operators in the context of export and import activities to determine customs tariff classification for uniform customs clearance. Then, existing working methods of economic operators are taken into account without disproportionate administrative burdens. Customs tariff numbers must already be transmitted before crossing the border as part of the customs declaration.</p> <p>In our opinion, the customs tariff classifications could be used as a system framework to include ecodesign requirements. This would allow ecodesign-specific conformity checks at the border using the customs nomenclature combined with ecodesign specifications.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>[1] https://www.consilium.europa.eu/media/69109/st16723-en23.pdf: For apparel and footwear, Article 20a of the ESPR on the Destruction of unsold consumer products refers to the CN nomenclature listed in Annex VIIa.</p> <p>[2] Proposal for a Directive of the European Parliament and of the Council amending Directive 2008/98/EC on waste; COM/2023/420; https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52023PC0420: The extended producer responsibility scheme for textiles stipulates that for the textile, textile-related and footwear product register(Article 22b(4)), the application for registration shall include the Combined Nomenclature codes of the textile, textile-related and footwear products listed in Annex IVc that the producer intends to make available on the market for the first time within the territory of that Member State</p>	
172	3.2.1 Products included in the scope; 504- 529: general comment on product scope	We support the inclusion of workwear and sportswear within the scope.	Acknowledged
173	3.2.1; 504-510	[...] supports the focus on apparel.	Acknowledged
174	3.2.1; Workshop Question – is there a definition for each product category	<p>We agree to align the product categories with ongoing work of the PEFCR A&F. However, it is important to provide a PRODCOM-CN codes correlation table as the customs classification codes are needed to identify the products concerned and, thus, support import controls and market surveillance.</p> <p>Apparel textiles are the most suitable subgroup, but the differences among product categories need to be taken into account and have different requirements. Further simplification of the PEFCR product segmentation should be explored, e.g. narrowing down the categories, but splitting them into woven and knit as well as functional wear. All this needs to be carefully assessed by technical studies.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>
175	3.2.1; 504	We propose to use the HS codes instead of PRODCOM because, unlike the PRODCOM codes, the HS codes are internationally used. Thus, they are	Acknowledged

ID	Stated section; stated line	Comment	Answer
		integrated in the processes of economic operators in the context of export and import activities to determine the tariff classification for uniform customs clearance. The existing working methods of economic operators outside the EU are taken into account without imposing a disproportionate administrative burden.	The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.
176	3.2; Question Do you think that the scope is correctly defined? How can it be better described?	It is suggested that ecodesign act should not have the task to define each product category but rather make groupings of these categories under specific criterions. Furthermore, CN codes definitions and relevant CN code prospects will be better for to industry to understand the diversifications.	Acknowledged The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.
177	3.2.1; 504-529	The reasoning behind the inclusion criteria is sensible, as is alignment of the categories with those of the PEFCR apparel & footwear	Acknowledged The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.
178	3.2.1; 505-510	[...] The analysis reported in Section 3.1 revealed that, within the product group textiles and footwear, apparel textiles is the most suitable subgroup to be addressed by the PS because it: — has potential improvements already investigated by the literature — has the largest share in the EU market — produces the largest share of the environmental impacts, based on the available literature [...] As mentioned in previous comments, the analysis of literature review does not include a reference to the background reports supporting the development of criteria for the EU Ecolabel for textiles and footwear, as well as Nordic Swan and the Blue Angel. Moreover, the availability of reports outlining the environmental impacts of the textile sector overall, which includes home/interior textiles, footwear and technical textiles, is quite significant.	Rejected This PS must prioritise the most important subgroup of textile products. Other subgroups must be addressed by different studies. The authors of this PS are continuously in contact with colleagues working on the other studies related to the WFD and TLR. The Commission is committing to develop all these studies in synergy. The stakeholder should be aware that the voluntary frameworks of EU Ecolabel, Blue Angel and Nordic Swan Ecolabel establish criteria with a very different approach compared to the final products assessed under the new mandatory legislation of ESPR. The PS addresses this topic in section 7.

ID	Stated section; stated line	Comment	Answer
		<p>In addition, while in relative terms the market share and the environmental impacts attributed to apparel textiles are bigger, in absolute terms the production volumes and the environmental impacts attributed to home/interior textiles are also significant. The EU Textiles Strategy for Sustainable and Circular Textiles announced that the Commission will prioritise products under Ecodesign with the highest potential and impacts in terms of environmental sustainability, with an initial assessment showing that this should include personal and household textiles.</p> <p>While [...] strongly supports the development of Ecodesign for apparel textiles, we urge the Commission to consider broadening the scope and ensuring consistency and synergies with other legislations, notably:</p> <ul style="list-style-type: none"> - The Waste Framework Directive, which introduces the development of Extended Producer Responsibility schemes for all textiles and footwear based on the eco-modulation of fees building on Ecodesign requirements. - Green Public Procurement and the EU Ecolabel which currently address home/interior textiles. As the development of mandatory GPP and the revision of the EU Ecolabel criteria will be closely linked to the development of Ecodesign for textiles and build on the preparatory study, it would be more coherent setting a broader scope than apparel textiles. - The Textiles Labelling Regulation, which applies to a broader range of textiles than apparel and will consider the introduction of sustainability and circularity labelling building on Ecodesign. 	
179	3.2.1 Products included in the scope; 505-529	[...] supports the authors observation:	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>“the analysis reported in Section 3.1 revealed that, within the product group textiles and footwear, apparel, textiles is the most suitable subgroup to be addressed by the PS.”</p> <p>and the Scope proposed and detailed namely in Table 6.</p>	
180	Section 3.2.1; 505-506	<p>Adding footwear to the scope of the ecodesign regulation for textiles and footwear is imperative. As shown in Table 5 of the report, footwear is responsible for at least one third of the environmental impact of resource use, water use and land use and for one fifth of the greenhouse gas emissions of the entire textiles and footwear product group. Ecodesign requirements that increase the lifespan of footwear and reduce the environmental impact of production would have huge potential to realise savings.</p> <p>Excluding footwear from ecodesign regulations could lead to inconsistencies with Extended Producer Responsibility (EPR) as foreseen in the Waste Framework Directive (WFD). Footwear is set to be included in the scope of ecomodulation as part of EPR schemes – the criteria for which will be set using Ecodesign requirements (see Article 22c in the Parliament’s position of the revised WFD). It is thus of high importance to address footwear in the preparatory study in order to ensure that ecodesign criteria are established in time before the ecomodulation of products under the WFD starts.</p> <p>There is an urgent need for durability and reparability requirements for footwear. Footwear is often designed with planned obsolescence in mind, leading to frequent replacements and increased waste. By incorporating ecodesign principles, such as durability, spare parts availability, ease of disassembly and availability of repair-relevant information material into footwear regulations, manufacturers would need to produce longer-lasting and repairable footwear, also complementing further policy processes aimed at promoting longer product lifetimes and repair like the directive on common</p>	<p>Rejected</p> <p>Function and technical characteristics of footwear are very different from textile apparel. Footwear must be addressed by a different study.</p>

ID	Stated section; stated line	Comment	Answer
		<p>rules promoting the repair of goods.</p> <p>Excluding footwear from the scope would mean delaying the development of ecodesign requirements for footwear, and thus also a right to repair for footwear, for many years to come and leaving a great potential unutilised.</p>	
181	Section 3.2.1; 505-506	<p>Adding footwear to the scope of the ecodesign regulation for textiles and footwear is imperative. As shown in Table 5 of the report, footwear is responsible for at least one third of the environmental impact of resource use, water use and land use and for one fifth of the greenhouse gas emissions of the entire textiles and footwear product group. Ecodesign requirements that increase the lifespan of footwear and reduce the environmental impact of production would have huge potential to realise savings.</p> <p>Excluding footwear from ecodesign regulations could lead to inconsistencies with Extended Producer Responsibility (EPR) as foreseen in the Waste Framework Directive (WFD). Footwear is set to be included in the scope of ecomodulation as part of EPR schemes – the criteria for which will be set using Ecodesign requirements (see Article 22c in the Parliament’s position of the revised WFD). It is thus of high importance to address footwear in the preparatory study in order to ensure that ecodesign criteria are established in time before the ecomodulation of products under the WFD starts.</p> <p>There is an urgent need for durability and repairability requirements for footwear. Footwear is often designed with planned obsolescence in mind, leading to frequent replacements and increased waste. By incorporating ecodesign principles, such as durability, spare parts availability, ease of disassembly and availability of repair-relevant information material into footwear regulations, manufacturers would need to produce longer-lasting and repairable footwear, also complementing further policy processes aimed at promoting longer product lifetimes and repair like the directive on common</p>	<p>Rejected</p> <p>Function and technical characteristics of footwear are very different from textile apparel. Footwear must be addressed by a different study.</p>

ID	Stated section; stated line	Comment	Answer
		<p>rules promoting the repair of goods.</p> <p>Excluding footwear from the scope would mean delaying the development of ecodesign requirements for footwear, and thus also a right to repair for footwear, for many years to come and leaving a great potential unutilised.</p>	
182	3.2.1; 505-510	We support that the focus of the scope is apparel. Especially consumer apparel should be in the focus, as their market share and environmental impacts are the biggest, and there is the most improvement potential.	Acknowledged
183	3.2; 505	[...] welcomes the fact that the PS focuses on apparel. Indeed, [...] believes that home/interior textile products should not be included in the Delegated Act for textiles given differences in the value chain and use conditions compared to garments.	Acknowledged
184	3.2.1; 505-506	<p>The ESPR specifies garment and footwear as a special focus in the textiles product group to be prioritised for regulation. Excluding shoes from the scope would be a contradiction to the stipulations and understandings of the legislators. Product-specific material requirements for footwear must be included as part of the development of ecodesign requirements.</p> <p>Adding footwear to the scope of the ecodesign regulation for textiles and footwear is imperative. As shown in Table 5 of the report, footwear is responsible for at least one third of the environmental impact of resource use, water use and land use and for one fifth of the greenhouse gas emissions of the entire textiles and footwear product group. Ecodesign requirements that increase the lifespan of footwear and reduce the environmental impact of production would have huge potential to realise savings.</p> <p>Excluding footwear from ecodesign regulations could lead to inconsistencies with Extended Producer Responsibility (EPR) as foreseen in the Waste Framework Directive (WFD). Footwear is set to be included in the scope of eco-modulation as part of EPR schemes – the criteria for which will be set using ecodesign requirements (see Article 22c in the Parliament’s position of the revised WFD). It is thus of high importance to address footwear in the preparatory study in order to ensure that ecodesign criteria are established in time before the eco-modulation of products under the WFD start.</p>	<p>Rejected</p> <p>Function and technical characteristics of footwear are very different from textile apparel. Footwear must be addressed by a different study.</p>

ID	Stated section; stated line	Comment	Answer
		<p>There is an urgent need for durability and reparability requirements for footwear. Footwear is often designed with planned obsolescence in mind, leading to frequent replacements and increased waste. By incorporating ecodesign principles, such as durability, spare parts availability, ease of disassembly and availability of repair-relevant information material into footwear regulations, manufacturers would need to produce longer-lasting and repairable footwear, also complementing further policy processes aimed at promoting longer product lifetimes and repair like the directive on common rules promoting the repair of goods.</p> <p>Excluding footwear from the scope would mean delaying the development of ecodesign requirements for footwear, and thus also a right to repair for footwear, for many years to come and leaving a great potential unutilised.</p> <p>Horizontal regulation of intermediate products could be a good approach of addressing as many products as possible for the textiles group. In order to take account of specific functional aspects of end products, material requirements for end products would then have to be developed in addition to requirements for intermediate products.</p>	
185	3; 506	We agree that the apparel textiles is the most suitable subgroup to be addressed by the Delegated Act as this will ensure the development of common eco-design requirements. However, some eco-design requirements will have to be adapted to each product category, meaning that level of performance, tests, value, threshold or even exceptions should be adapted to each product category if technically needed	Acknowledged
186	3; 507	An impact analysis based on real and scientific approach is missing in some of the literature used to reference conclusions.	<p>Clarification from the stakeholder</p> <p>The authors do not understand the comment. In the next consultation, the stakeholder is invited to explain what “impact analysis” means. The authors of the PS provided the answers to comments reported by the same stakeholder on section screening the potential improvements.</p>
187	3; 508	Waste is measured in mass not in value. Look at the mass instead of value (table 3.1.2)	Clarification from the stakeholder

ID	Stated section; stated line	Comment	Answer
			The authors do not understand the comment. Line 508 does not report or refer to waste. The stakeholder is invited to clarify their comment in the next consultation.
188	3; 509	If literature is missing, research should be done. This should not be a reason NOT to focus on.	Acknowledged.
189	3.2.1; 511-512	<p>As Eco-design for Sustainable Products Regulation will be applied to all textiles on the EU market and most of the clothing and home textiles are imported, ESPR measures will affect textile production outside of Europe. For this reason, when defining the new rules on textiles, using the international HS Code System instead of the EU PRODCOM System could be useful.</p> <p>HS Code System is already used by market operators inside and outside EU for the trade of goods and allows the assignment of goods in a tiered approach in the same granularity as the EU PRODCOM system. It is already international common practice using existing IT systems (TARIC, EZT, etc.) used not only by traders but also by enforcement authorities. This means, that no additional efforts or administrative burden would be created for EU and Non-EU market operators or authorities if the international HS code would be applied. Additional advantage for EU companies would be, that they can already use the information they receive from their Non-EU suppliers.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p> <p>Section 9.1.1 reports the connection between PRODCOM, CN and HS codes.</p>
190	3.2.1; 511-512	<p>The customs classification codes should be used to identify the products concerned, to support import controls and market surveillance. The PRODCOM-CN codes correlation table should be included in the study to analyse any discrepancies and impacts.</p> <p>https://showvoc.op.europa.eu/#/datasets/ESTAT_PRODCOM_List_2024/metadata</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p> <p>Section 9.1.1 reports the connection between PRODCOM, CN and HS codes.</p>
191	3.2; 511	In line with the product categories based on ongoing work performed within the development of PEFCR A&F, our Federation is open to discuss with JRC the case of “exceptional pieces” (as defined in PEFCR v2.0) that are excluded from the PEFCR A&F scope.	Acknowledged
192	3.2.1.; 512-514	It's crucial to acknowledge that PEF is neutral regarding fiber durability, and we advise against adopting such an approach. By applying identical thresholds for	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>all fibers based on standards measuring physical durability, there's a significant risk of unfairly penalizing more delicate materials while inadvertently promoting the use of polyester, the primary driver of overproduction. This fact is underscored in the report itself, as noted by the JRC, which recognizes polyester as the key factor behind the global increase in fiber production. (lines 1259 and 1260). Moreover, lines 1882, 1883 “Synthetics are perceived as posing the highest risk among fabric types, with only 22% categorising them as significantly risky (European Commission, 2009).” The objective of ecodesign requirements should be to remove the worst-performing among the products made with the same material, not to put the performance of one material against another one, and to set thresholds that are appropriate per fibre type.</p>	<p>Design options will be addressed in Task 6 of the PS.</p>
193	Section 3.2.1; 512-514	<p>The PS states that aligning the category segmentations with the PEF-CR A&F “allows the JRC to use the work performed by the project...whenever it is appropriate within the frameworks of the ESPR and the EU Ecolabel”. We caution against an approach that is defined by blind reproduction of the product categories from the PEF-CR A&F as these product categories were defined based on the interests of the companies that pay to take part in this process.</p> <p>It is also important to note that PEF is fibre-neutral on physical durability and we do not recommend such an approach. By setting the same thresholds for all fibres in relation to standards that measure physical durability aspects, there is a serious risks to critically penalise – and push out of the market – more delicate materials, while incentivising the use of polyester, which is the real culprit of overproduction – a fact which is recognised by the report itself where it notes that it is polyester driving the increase of global fibre production (lines 1259 and 1260). Moreover, lines 1882, 1883 “Synthetics are perceived as posing the highest risk among fabric types, with only 22% categorising them as significantly risky (European Commission, 2009).” The objective of ecodesign requirements should be to remove the worst-performing among the products made with the same material, not to put the performance of one material against another one, and to set thresholds that are appropriate per fibre type.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>
194	3.2.1; 512-516	[...] supports the use of the PEF-CR categories.	Acknowledged

ID	Stated section; stated line	Comment	Answer
195	Section 3.2.1 Products included in scope; 512-514	<p>The PS states that aligning the category segmentations with the PEF-CR A&F “allows the JRC to use the work performed by the project..whenever it is appropriate within the frameworks of the ESPR and the EU Ecolabel”. We caution against an approach that is defined by blind reproduction of the product categories from the PEF-CR A&F as these product categories were defined based on the interests of the companies that pay to take part in this process.</p> <p>It is also important to note that PEF is fibre-neutral on physical durability and we do not recommend such an approach. By setting the same thresholds for all fibres in relation to standards that measure physical durability aspects, there is a serious risks to critically penalise – and push out of the market – more delicate materials, while incentivising the use of polyester, which is the real culprit of overproduction – a fact which is recognised by the report itself where it notes that it is polyester driving the increase of global fibre production (lines 1259 and 1260). Moreover, lines 1882, 1883 “Synthetics are perceived as posing the highest risk among fabric types, with only 22% categorising them as significantly risky (European Commission, 2009).” The objective of ecodesign requirements should be to remove the worst-performing among the products made with the same material, not to put the performance of one material against another one, and to set thresholds that are appropriate per fibre type.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>
196	3.2.1; 512-516	<p>We support using the PEFCR categories for apparel. When we think about durability requirements, a separation should also be made between knitted and woven apparel and different use cases.</p> <p>It should be noted that this categorization for apparel is not workable for workwear.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>
197	3.2.1; 513	<p>Active since 2019, the Technical Secretariat has been working continuously on creating an industry standard for establishing the Product Environmental Footprint Category Rules for Apparel (PEFCR). While the second draft has just been released, the durability measures developed by the Technical Secretariat are as close to an industry standard, we can come.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
		<p>However, the current detailed PEFCR thresholds regarding intrinsic quality are often the same for different product categories. An example could be the thresholds for dimensional change (ISO 6330/ISO 5077), where it is the same thresholds for t-shirts, shirts and blouses and jackets and coat for woven (both sport and non-sport). This creates unnecessary complexity, and the subcategories should be simplified to make them fit for purpose. It can be done by for example aligning the subcategories with fabric groups (woven products, knitted products, denim, outerwear, and coated products and tailoring) or by defining subcategories based on the products functionality and maintenance process as this will also create a stronger coherence with the durability tests (see recommendations below).</p> <p>Will the approach taken for the setting of requirements also take into consideration the differences between fibres, materials composition, fabric group, and functionality/intended use for the different product categories?</p>	
198	3.2.1; 513-514	<p>While Ecodesign could integrate valuable learnings from the development of the PEF Category Rules for Apparel and Footwear, its scope and approach should not necessarily be limited by the work undertaken under PEF. A careful consideration of the outcome of PEF is necessary, particularly as this process has been mainly driven by industry, while civil society and policy makers are underrepresented in the decision-making process.</p> <p>When progressing with the preliminary study, it is necessary to pay particular attention to the fact that PEF introduces fibre-neutral requirements. By setting the same thresholds regardless of the type of fibre, there is a risk of favoring the use of polyester over natural fibres (e.g. with respect to physical durability thresholds). Instead, Ecodesign could drive improvements among textiles made with the same material by establishing minimum horizontal requirements by fibre type as done under the EU Ecolabel.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
		[...] strongly recommends further investigating the possibility of aligning the scope of Ecodesign with the EU Ecolabel, the Nordic Swan Ecolabel and the Blue Angel to introduce minimum requirements for different type of fabrics and complement with specific requirements applying to end products when relevant.	
199	3.2.1; 513-514	The PEFCR is being updated – How will the commission ensure that this update and the preparatory study are aligned in regards to scope and if not, how will this affect the applicability to the PEFCR?	Acknowledged The preparatory study takes into account the work done on the PEFCR but may complement it where needed for the purpose of assessing the impact of possible ecodesign requirements. Whether the PEFCR could be applied as an instrument to comply with ecodesign requirements, for instance on the lifecycle environmental impact, will be considered in subsequent tasks of the preparatory study.
200	3; 514	PEF apparel and footwear includes shoes, so this PS should also include shoes. This explorational-study gives insight in the Dutch market. https://open.overheid.nl/documenten/dpc-c9297c6bbbe94a84bf7aa5ffb8d6af0ac8c2770d/pdf	Rejected Function and technical characteristics of footwear are very different from textile apparel. Footwear must be addressed by a different study.

6.3 Comments from ID 201 to ID 300

Table 6. Comments on section 3 – Scope. From ID 201 to ID 300

ID	Stated section; stated line	Comment	Answer
201	3.2.1 Products included in	The product categories presented in Table 6 are not appropriate with regards to setting ecodesign requirements e.g. to defining average values for durability. The "ID 5 Pants and shorts" category, for example, includes jeans, fashion fabric trousers and functional outdoor	Acknowledged The categorization of the products in the scope is assessed in Task 4, which reports an analysis

ID	Stated section; stated line	Comment	Answer
	<p>the scope; 515 ff. (table 6)</p>	<p>trousers. All of these pants are apparel textiles but have different product fabric structures and finishes, therefore different requirements must be set for the product aspects (especially for durability).. Besides, we see the need to basically distinguish between functional products, e.g. outdoor products, with specific material compositions and finishes, and fashion products.</p> <p>Our proposal for the definition of product categories is therefore as follows (and can made available as a separate document):</p> <ol style="list-style-type: none"> 1. Subdivision into the functional areas: Fashion-, Functional-, Babies/Children’s clothing, Underwear 2. Subcategories: Here, a distinction is made between knitted/crocheted and not knitted/crocheted. These designations have been taken from the descriptions of the harmonised customs system and are intended to ensure recognisability: Upper body, Upper body not knitted/crocheted, Lower body, Lower body not knitted/crocheted, On top garments, On top garments not knitted/crocheted 3. The first four digits of the HS nomenclature are assigned to the subcategories. It should be noted that the HS codes cover a wide variety of products that do not all belong to the same product type in the proposed categories. Therefore, the HS codes can occur more than once within the structure, but the allocation to subdivisions (1.) and subcategories (2.) allows a specific assignment to be made. 4. In order to incorporate the different material uses for appropriate requirements into the product categories and the differentiation between mono- and multi-material, each subcategory (2.) is divided into use of natural fibre (100% or >50%), chemical fibre (100% 	<p>of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR. EU Ecolabel and EU GPP are addressed in section 7 and 8, respectively.</p> <p>While the first ESPR delegated act is expected to focus on apparel, there is no intention to reduce the scope of the EU Ecolabel to apparel. The preparatory work on ecodesign requirements for apparel will be complemented by additional analysis to support the revision of the EU Ecolabel criteria. For product groups with the same scope, EU Ecolabel criteria and ESPR requirements will indeed be developed in synergy, so that EU Ecolabel will indeed identify best-in class products while guaranteeing compliance to ESPR requirements. This will not prevent EU Ecolabel to cover additional sub-groups (e.g. home textiles/cleaning textiles) that are not going to be covered by ESPR in the short term.</p>

ID	Stated section; stated line	Comment	Answer
		<p>or >50%) or natural 50%/chemical 50%.</p> <p>This procedure is similar to the product categories within the study, but takes the textile technological perspective into account in order to be able to set realistic average requirements. In addition, this product category scheme requires only minor additions from economic operators for a later integration, as it was developed based on the previous data queries for customs tariff numbers. This structure allows the product categories to be flexibly adapted to the scope during the development of the product requirements.</p> <p>Does JRC see the need to develop special requirements for children’s clothing? In different regulations special requirements are already included, see REACH Annex XVII entry 50 (Polycyclic-aromatic hydrocarbons (PAHs)) or entry 51 and 52 (Phthalates).</p> <p>In general, the presented product scope is too narrow compared to the current scope of the EU Ecolabel for textiles. At the moment the EU Ecolabel addresses apparel, home/interior textiles, technical textiles, and intermediate products. A restriction of the scope of the EU Ecolabel would result in losing license holders and product licenses. Therefore, we suggest to take this conflict into account and to enlarge the scope for the EU Ecolabel. In conclusion, we suggest to consider a graduated scope to resolve the conflict between the narrow scope for ecodesign and the extended scope for the EU Ecolabel (as well as for GPP, see comment 10).</p> <p>In addition, we kindly ask JRC to define the future role of the EU Ecolabel within product group related mandatory regulation. Are products certified with an updated EU Ecolabel within a certain product group regarded as “best in class”? Will there be an alignment of newly regulated product groups and (if necessary) new EU Ecolabel criteria?</p>	
202	3.2.1; 515	<p>For some ecodesign requirements, we would suggest exploring a simplified version of the subcategories.</p> <p>As an example for durability, we strongly recommend categorizing textile products by fabric</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
		<p>groups instead of the PEFCR product categories. Using fabric groups instead of the PEFCR product categories will more clearly reflect how textile products are being used, washed, and maintained by end-consumers. Further will fabric groups be a more simple and coherent categorization of textile products and more fit for addressing requirements under the ESPR framework.</p> <p>The PEFCR product categories do not clearly reflect how products are used. In Appendix V to the newest version of the PEFCR (version 2.0), the durability thresholds are the same for different product categories. It clearly indicates a potential for simplifying the PEFCR product categories.</p> <p>We recommend categorizing textile products by fabric group:</p> <p>The fabric group:</p> <ul style="list-style-type: none"> - Woven products - Flat knitted products - Circular knitted products. <p>This could especially include looking further into specific product groups with specific characteristics, like;</p> <ul style="list-style-type: none"> - Denim (jeans, jackets, overall, dress, skirt etc.) - Outerwear (coats, jackets, one piece suit, coveralls etc.) 	

ID	Stated section; stated line	Comment	Answer
		<p>- PU coated products and tailoring.</p> <p>If needed, a further distinctions can be made based on</p> <p>- The choice of material; as examples, wool-based products are not washed as often as other natural fibers,</p> <p>- How the textile products are being used and worn (i.e., the closer the product is worn to the body the more often it is normally washed by consumers).</p>	
203	3.2.1; Question Is there a definition for each product category?	<p>The definitions for the three categories of textiles (apparel, technical and technical apparel) leave room for too much interpretation. For many products, it is still unclear, what category they belong to.</p> <p>This is crucial to establish, as specific product requirements might apply to these categories, and thus it might have a reverse environmental impact.</p> <p>Define customized and upcycled.</p> <p>It is crucial that customization and upcycling is defined more clearly, to know what kind of “treatment” of a textile product is viewed as customized or upcycled.</p> <p>Examples:</p> <ul style="list-style-type: none"> o When a textile is being printed. Does it count as being customized? o Laundry services that own and lease textiles to the public sector continuously do repairs and “customize” textile products (such as bed linen, etc.) and then send them back to the customer. In this case the textiles would not be in scope from an early stage onwards. 	<p>Acknowledged</p> <p>The stakeholder is invited to propose improvement to the definitions reported in the PS.</p> <p>The comment on customization and upcycling is acknowledged and will be taken into account in the impact assessment.</p> <p>Furthermore, be aware that “Customised” and “upcycled” textile products are concepts originally present in the Textile Labelling Regulation EU 1007/2011 (TLR) and from there now also in the proposed amendment to the WFD on textiles and here, in the context of the ESPR DA on textiles. Please bear in mind that the concepts need to be aligned throughout EU law. In the context of the current review of the TLR, a statutory definition of these concepts is envisaged</p>
204	3.2.1; 515	<p>We propose validating the product categories initially suggested in the preliminary report to ensure full alignment with the PEF CR with only small adjustments explained below. However, it is crucial to emphasize that these categories need to be approached differently for each</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis</p>

ID	Stated section; stated line	Comment	Answer
		<p>criteria outlined in the ESPR. Additionally, we recommend subdividing the larger categories into more specific subcategories to ensure that the product requirements are set for comparable products, in an efficient and meaningful manner. Please refer to [...]’s submission via email to see the categorisation proposal in a table form.</p> <p>Proposal for categories and subcategories.</p> <p>Category</p> <p>T-shirts, shirts and blouses</p> <p>Definition</p> <p>Includes all tops direct contact with the skin (layer 1) with or without sleeves (long or short), tank tops, t-shirts, polo, shirts</p> <p>Subcategories</p> <ol style="list-style-type: none"> 1. T-shirt, base layer, tank top (short and long sleeves) 2. Shirts, blouses, polos (short and long sleeves) <p>Explanation of the change suggested</p>	<p>of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
		<p>T-shirts and base layers are simple products with no accessories added while shirts and blouses can have some small accessories (buttons, zipper..). This is the reason why it is useful to distinguish them for example when setting reparability and recyclability requirements.</p> <p>Category</p> <p>Sweaters and mid layers</p> <p>Definition</p> <p>All tops above a layer 1 (layer 2) with or without sleeves (long or short), pullovers, cardigans, hoodies, jogging jackets, sweatshirts, mesh and woolen jumpers, cardigans, etc.</p> <p>Subcategories</p> <p>No subcategory needed</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Category</p> <p>Jackets and coats</p> <p>Definition</p> <p>All tops above a layer 2 (layer 3) with or without sleeves (long or short), blazers, suit jackets, overcoats, other light jackets, rain jackets, outdoor winter jackets, parkas, down jackets, fur jackets, outdoor vests...</p> <p>Subcategories</p> <ol style="list-style-type: none"> 1. Waterproof jackets : coating & lamination processes 2. Non waterproof jackets with filling (down, padding, ball fibre...) 3. Others jackets (without filling and non waterproof but can be water repellent) <p>Explanation of the change suggested</p> <p>We propose distinguishing lightweight jackets and heavy padded jackets, down jackets, outdoor winter jackets with waterproof lamination/coating, as they may vary significantly in terms of usage, maintenance, and performance.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Category</p> <p>Pants & Shorts</p> <p>Definition</p> <p>Includes any bottoms worn over a layer 1 (layer 2), with legs (long or short), trousers, jeans, shorts...</p> <p>Subcategories</p> <ol style="list-style-type: none"> 1. Waterproof pants & shorts 2. Non waterproof other pants & shorts (can be water repellent) <p>Explanation of the change suggested</p> <p>Waterproof pants (for example ski pants) can be very different from casual pants as they are designed to provide a balance of warmth, waterproofing, breathability, and comfort which means many layers and different materials can be used while casual pants are very light and simple in their construction.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Category</p> <p>Dress, Skirts & Jumpsuits</p> <p>Definition</p> <p>In line with the JRC proposal</p> <p>Subcategories</p> <ol style="list-style-type: none"> 1. Waterproof dress, skirts & jumpsuits 2. Non Waterproof other dress, skirts & jumpsuits (can be water repellent) <p>Explanation of the change suggested</p> <p>Example of products that can be in the first subcategory: waders, cycling waterproof poncho, cycling rain skirts.</p> <p>Category</p> <p>Legging, Stocking Tights & Socks</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Definition</p> <p>In line with the JRC proposal</p> <p>Subcategories</p> <ol style="list-style-type: none"> 1. Leggings 2. Ankle socks, knee socks, low-cut socks, stockings, tight <p>Explanation of the change suggested</p> <p>Socks, stockings and tights are worn in direct contact with the skin and should be washed after each use. They are more closely related to underwear in terms of their function and purpose. They are typically worn underneath the outer clothing. Leggings, on the other hand, are typically worn as outerwear, serving a different purpose altogether. While they may share some similarities in terms of material and construction, leggings are generally worn as a form of pants or bottoms, often as a fashion statement or for sport activities, rather than purely for functional undergarment purposes. Usage conditions are very different.</p> <p>Category</p> <p>Underwear</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Definition</p> <p>In line with the JRC proposal</p> <p>Subcategories</p> <ol style="list-style-type: none"> 1. Boxers, briefs, panties 2. Bras, body-shaping suits <p>Explanation of the change suggested</p> <p>Bras, body shaping suits and panties can also be different in terms of recyclability compared to boxers or panties. Bras can be challenging to recycle due to their complex construction and the combination of materials used, such as elastic, metal hooks, and various fabrics. Similarly, there are considerations linked to repairability. Bras can sometimes be repaired, depending on the issue. For example, a broken underwire might be replaceable, or a loose strap could be re-sewn while panties are generally less likely to be repaired, especially if they are made from stretchy or delicate materials.</p> <p>(continuation below)</p>	
205	3.2.1; 515	<p>Category</p> <p>Swimwear</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the</p>

ID	Stated section; stated line	Comment	Answer
		<p>Definition</p> <p>In line with the JRC proposal</p> <p>Subcategories</p> <ol style="list-style-type: none"> 1. Bathing suits 2. Broad shorts <p>Explanation of the change suggested</p> <p>Board shorts are mainly made with woven fabric, with or without water repellent treatment, and with accessories. On the other hand, swimwear is usually knitted or warp knitted, with a high percentage of elastane, without water repellent treatment and without accessories except cords. Both have different production and accessories, and therefore they do not have the same environmental impact and neither the same durability/repairability/recyclability characteristics. That is why there is a need for different thresholds.</p> <p>Category</p> <p>Apparel textiles accessories</p>	<p>relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
		<p>Definition</p> <p>In line with the JRC proposal</p> <p>Subcategories</p> <ol style="list-style-type: none"> 1. Hats 2. Scarves and ties 3. Belts 4. Gloves and mittens <p>Explanation of the change suggested</p> <p>The products included in the apparel textile accessories category differ significantly in their materials, construction, and usage, resulting in variations in durability, recyclability, and reparability. It would therefore be difficult to use the same set of requirements for such a broad category.</p>	
206	3.2.1; 515	<p>We would like to propose distinguishing sportswear from ready to wear/ fast fashion apparel due to several key factors. We fully support the inclusion of the sportswear in the scope of the delegated act. We agree that it should follow the same criteria as other apparel, however, possibly with different thresholds. The main arguments for setting separate thresholds for sportswear are the following:</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
		<p>1. Usage intensity: Sportswear products are typically subjected to more rigorous use and conditions compared to regular ready to wear apparel. They are designed to withstand activities like running, intensive workouts that often involve sweat, frequent washing and exposure to outdoor elements (sun, rain..).</p> <p>2. Performance requirements: Sportswear is often designed with special performance attributes such as moisture management, breathability, and water-proofness.</p> <p>3. End of life considerations: Sportswear may contain specialized performance materials or coatings that make them challenging to recycle or repurpose effectively (Example of technical gloves: they can have up to 10 different materials chosen for their distinct properties such as a waterproof outer layer, an insulating middle layer and a moisture barrier inner layer. This layered assembly complicates recycling, as each material may necessitate individual separation and processing.)</p> <p>In case distinct thresholds apply to sportswear and ready-to-wear/fast fashion products, it is important that sportswear items sold by ready to wear brands adhere to the same thresholds - if marked as sportswear products.</p>	<p>The authors invite the stakeholder to provide technical parameters that allow the distinction between sportswear and leisurewear. This will be very helpful in the distinction suggested in the comment.</p>
207	Table 6. Product categories of apparel textiles; 515	<p>We would like to add nightwear (pyjamas, bathrobe...) as a new category because they don't have the same lifespan than other pants for example.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>
208	Table 6. Product categories of	<p>Where is considered periodwear ? They are not medical devices but they have a bigger impact than a simple panty. Meanwhile they avoid a lot of hygienic waste. They should have their own category "absorbant underwear" with the exclusion of medical devices.</p>	<p>Clarified</p> <p>Lines 560-562 report that reusable textile absorbent hygiene products are considered technical textiles.</p>

ID	Stated section; stated line	Comment	Answer
	apparel textiles; 515		
209	Table 6. Product categories of apparel; 515	Ladies ' bras can't be compared to men trunks. There are too much accessories and eve the fabrics are totally differents. The underwear category must be splitted in 2 with corsetry separated form the rest.	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>
210	Table 6. Product categories of apparel; 515	The fonctionnality and the claim of a Sportswear product must be considered. The definition of sportswear must be more precised. For exalmples, is a judo kimono considered as "sportswear" ? What about fencing or cycling pants ? A body (one piece underwear suit) can also be used for Dancing and yoga. Diving suit composed with the similar moss than certain bras...	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p> <p>The authors invite the stakeholder to provide technical parameters that allow the distinction between sportswear and leisurewear. This will be very helpful in the distinction suggested in the comment.</p>
211	3.2.1; 515	<p>Comments on the proposed scope and product segmentation:</p> <ul style="list-style-type: none"> • Ensuring the right product segmentation will be critical for guaranteeing the envisioned impact of the ESPR i.e. reducing environmental impact, level playing field and ensuring effective implementation. • Tackling trade-offs between eco-design measures: capturing and dealing with the known trade-offs between eco-design measures anticipated for apparel products must be prioritised. The most effective way is to consider different granularity for product segmentation per anticipated eco-design measure as applying the same product segmentation per eco-design measure would lead not being able to tackle the trade-offs in a balanced and effective manner. i.e. <p>- For eco-design measures on durability, We recognize the ongoing work of the PEFCR A&F</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
		<p>to be considered when developing eco-design requirements. However, to ensure proper applicability, simplification of the product categories could be needed, as well as adaptations of the level of performance, tests, value, threshold, or even exceptions if technically needed. A simplified version of the product segmentation could be considered (see below), however split in the subcategories woven and knit, as well as additional tests for products with functional claims (e.g waterproofness, water repellancy, insulation)</p> <p>o Our suggested simplifications of table 6 are:</p> <p>Product Categories Product Definition</p> <ol style="list-style-type: none"> 1. Tops - Garment to cover the upper body incl non-, short- and long sleeves. (e.g. t-shirts, vests, singlets, tank tops, polo-shirts, shirts, blouses, pullovers, cardigans, sweaters, sweatshirts, hoodies etc.) 2. Jackets & Coats-Garments to put on top of e.g shirt or sweater to protect from different weather conditions (e.g. blazers, suit jackets, overcoats, other light jackets, rain jackets, outdoor winter jackets, parkas, down jackets, outdoor vests) 3. Bottoms-Garment to cover the lower body or one-piece garment covering both lower and upper part of the body (other than dresses), may protect from different weather conditions. (e.g. casual pants, outdoor pants, dress pants, jeans, sports pants, capri pants, shorts, jersey leggings/tights, long-johns, overalls and jumpsuits (strapless, short- or long-sleeved)) 4. Dresses & Skirts-One-piece garment that covers both the upper and lower body (other than jumpsuits), or the lower body only (other than pants and shorts). (e.g. Short- and long-sleeved, strapless, wrap, long and short) 5. Stockings, Leggings & Tights-Tight garment to cover the legs and/or feet, in sheer material measured in for example denier or dtex (e.g. opaque and sheer tights, pantyhose, 	

ID	Stated section; stated line	Comment	Answer
		<p>fishnets)</p> <p>6.Socks - Tight garment to cover the feet (e.g. ankle socks, knee socks, low-cut socks)</p> <p>7. Underwear- same as suggested</p> <p>8. Swimwear-same as suggested</p> <p>9. Apparel accessories-same as suggested</p>	
212	3.2.1; 515	<p>Comments on table 6: Product segmentation for eco-design measures on recycled content:</p> <p>In addition to find suitable product categories for durability, for recycled content requirements a different approach must be considered. To effectively regulate and accelerate the textile to textile recycling industry, considering the right policy design to do so, will be critical. Whilst the fashion and apparel industry is highly committed to scale textile recycling, currently, the global textile industry (including Europe) is still challenged by the unavailability of an efficient textile recycling ecosystem as well as faced with limitations in recycling quality. Recycling technologies have very different quality outcomes depending on materials e.g. polyester recycling is faced with less quality issues, however natural fibre recycling such as cotton is today resulting in a lower quality fibre.</p> <p>Legislation must find a balance between managing these challenges as well as lay a foundation for an effective policy framework that drives further development, innovation and investment towards textile to textile recycling and in the long run focused on post-consumer waste recycling. Therefore regulating eco-design measures on recycled content will be critical.</p> <p>How? When assessing the possible product segmentation under the Delegate Act for Apparel that would effectively regulate recycled content eco-design measures, we see many challenges and risks linked to regulating a product level recycled content target. We believe it could act as a barrier towards industry ambitions of post-consumer textile to textile</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
		<p>recycling in the long term for the following reasons:</p> <ul style="list-style-type: none"> • Due to the diverging qualities of recycled materials compared to virgin materials today, setting product level targets will make it highly challenging for the industry to deal with trade-offs between durability and functionality considerations as well quality issues. For instance, with the expected eco-design measures on durability, combined with product level recycled requirements, are likely going to lead to an increase of blended compositions, which in turn will hamper recyclability. • Setting a product level target would require several exemptions as there are no recycled options for several materials available yet e.g. cotton jersey and woven, silk, acrylic, polyamide • Natural fibres and companies having a majority of natural fibres in their portfolio will be disadvantaged as there is a lower technical feasibility to include recycled content for natural fibers. <p>We therefore recommend the preparatory study to explore options for setting material portfolio performance targets on recycled content. We believe this could overcome the above mentioned challenges. Targets set at material portfolio level would enable the ability to “flex” the amount of recycled content used within products/lines while still achieving an overall target; for example, using more recycled content in certain product lines to compensate for using less in other product lines due to functional requirements, durability concerns, or other specifications.</p>	
213	3; 515	<p>We agree to align the product categories with ongoing work of the PEFCR A&F. However, it is important to provide a PROCOM-CN codes correlation table as the customs classification codes are needed to identify the products concerned and, thus, support import controls and market surveillance. PRODCOM and CN codes correlation should be provided in Table 40 (section 9.1.4).</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
214	3.2; Question Is there a definition for each product category? Is the current description enough? Why?	<p>In creating performance criteria according to the product description, "fabric properties" + "accessory preferences such as buttons and laces" + "sewing standards" can be taken into consideration. In this respect, instead of determining performance criteria on the basis of product groups, it is thought that it would be more appropriate to determine performance criteria in the following content:</p> <ul style="list-style-type: none"> -Standards for fabric - quality (valid for all ready-made clothing products, based on available standards); durability ((valid for all ready-made clothing products, based on available standards), functionality-performance (e.g. fireproofing, water repellent, anti-bacterial, etc.); recyclability (standards on fiber content to be able to be recycled) (not available standards on some products like elastaine !); the quality and durability of recycled content for fabric for clothing (the quality of this content and whether it is suitable for clothing production, etc.) (not available standards !); reparability (Seam slippage tests to some extent, quality control tests rather than performance standards - not available suitable standards indeed!) etc. -Standards for the use of accessories (use of laces for baby clothes, etc.) - these are indeed rules for product safety -Standards clothing - sewing; seam slippage tests, washing performance-durability tests etc. Please note that these tests are not based on product itself, but the features and weight of the fabric indeed ! <p>Therefore, taking into account possible product groups that need to be evaluated separately, a grouping can be made as follows:</p> <ul style="list-style-type: none"> -General performance criteria for all fabrics for clothing manufacturing, based on quality, durability, recyclability, the quality and durability of recycled content for fabric for clothing, reparability etc. except functionality-performance. -General performance criteria for all clothing products, -Performance criteria of fabrics according to functionality of clothing on specific product groups (Clothing made of technical textiles (workwear, sportswear, swimming wear), baby wear, socks, etc.) <p>General performance standards for accessories, or performance rules.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>
215	3.2.1; 515	<p>4. Is there a definition for each product category? Is the current description enough? Why?</p> <p>It's ok. Missing some products such as vests and tank tops. Blouses can also be with short sleeves and without. Working coats (used within the healthcare and similar) that are not for outdoor and aprons? Thinking about doll clothes vs baby's clothes? A recommendation might be not to go into too much details - a more general definition is to prefer.</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
216	3.2.1 Products included in the scope; 515	Finding the right product segmentation and product grouping will be critical when developing eco-design measures. For instance, for any future eco-design measures on recycled content, we strongly support the regulation of recycled content at the material portfolio level, rather than at the product level. While we understand the advantage for product specific labelling as a consumer information, it is a highly effortful and (from an impact perspective) additional non-value-adding effort to breakdown cumulative inbound sourcing volume quantities into individual product level information. As such, it would not drive the industrial motivation towards higher circularity impact and uptake of recycled materials as those decisions will be made at the generic source through material choices, largely independent of the final product usage.	Acknowledged The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.
217	3; 515	Products in the scope shall be indicated in a clearer way that prevents interpretation. For example, what does "dress" mean? HS codes are better fitting the purpose.	Acknowledged The authors of the PS invite the stakeholder to propose improvement of the current definitions. Table 40 in section 9.1.4 list the PRODCOM codes included in each category. PRODCOM codes are connected to HS codes – see section 9.1.1. The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.
218	Scope Q&A (18 March online consultation); Slides page 18	5. Do you agree with the approach used for workwear and sportswear? Why? Yes, BASF agrees with the approach used for workwear and sportswear. Sportswear is collected via the same collection system as apparel and t-shirt and a sport t-shirt is often not distinguishable for the user. It should not be distinguished from leisure apparel. Additionally, function is more important than sustainable aspect for workwear; if there is a	Acknowledged

ID	Stated section; stated line	Comment	Answer
		conflict between safety and sustainability, safety should be prioritized to ensure workers safety.	
219	3.2.1; 517-528	<p>[...] strongly supports including sportswear in the scope of Ecodesign. This is a product of frequent use by consumers who can wear it both for exercise and everyday activities, without making necessarily a distinction between sportswear and leisure wear.</p> <p>A potential exclusion of sportswear would create an artificial differentiation with leisure wear without taking into consideration consumers' behaviours.</p>	Acknowledged
220	3.2.1.; 517-528	<p>We strongly welcome the inclusion of sportswear and workwear in the scope of the preliminary study and we highly urge including them in the scope of delegated acts setting out ecodesign criteria for textile products.</p> <p>The report states that sportswear should be included when it is an “apparel textile” and does not belong to the list of excluded products. There can be no argument for excluding sportswear based on artificial distinctions on product function. Too wide an exclusion of sportswear from the scope would potentially exclude a huge amount of fast-moving consumer textile products. It could also create a perverse incentive for companies to classify their products as "technical textiles" to avoid regulation, potentially leading to an increase in plastic-based/synthetic production.</p> <p>Lines 520 and 521 state that sportswear could be considered technical textiles due to its high performance in terms of thermoregulatory. However, Di Domenico, I., Hoffmann, S.M. & Collins, P.K. in The Role of Sports Clothing in Thermoregulation, Comfort, and Performance During Exercise in the Heat: A Narrative Review. Sports Med - Open 8, 58 (2022). https://doi.org/10.1186/s40798-022-00449-4 find that “Research assessing the effect of sports clothing on thermoregulation, comfort, and performance during exercise” had “mixed findings concerning the effect of sports clothing to enhance thermoregulation, comfort, and</p>	<p>Acknowledged and rejected</p> <p>After reading Di Domenico et al. (2022), the authors think that this piece of literature does not provide a comparison between leisurewear and sportswear, but it analyses performance of several items of sportswear. For this reason, the sentence in the text of the PS was not changed.</p>

ID	Stated section; stated line	Comment	Answer
		<p>performance in both recreationally active and elite level athletes”. Therefore, we recommend changing the language since sportswear does not necessarily perform highly regarding thermoregulatory properties. Even if that is the case, it is realistic to expect sportswear items to have thermoregulatory properties and, at the same time, comply with ecodesign requirements. Any exception should be duly justified and in that case the high performance of thermoregulatory property must be certified.</p>	
221	Section 3.2.1; 517-528	<p>We strongly welcome the inclusion of sportswear and workwear in the scope of the preliminary study and we strongly urge including them in the scope of delegated acts setting out ecodesign criteria for textile products.</p> <p>The report states that sportswear should be included when it is an “apparel textile” and does not belong to the list of excluded products. There can be no argument for excluding sportswear based on artificial distinctions on product function. Too wide an exclusion of sportswear from the scope would potentially exclude a huge amount of fast-moving consumer textile products.</p> <p>We do not believe that distinguishing between sportswear and leisurewear is necessary in the context of ecodesign, where minimum requirements are set. A huge amount of fast-moving consumer textile products sold as sportswear is eventually used by consumers for leisure purposes. Given the market share and volumes of sportswear, it is imperative that this is included in the scope, as not to create loopholes and unfair advantages.</p> <p>Lines 520 and 521 state that sportswear could be considered technical textiles due to its high performance in terms of thermoregulation. However, Di Domenico, I., Hoffmann, S.M. & Collins, P.K. in The Role of Sports Clothing in Thermoregulation, Comfort, and Performance During Exercise in the Heat: A Narrative Review. Sports Med - Open 8, 58 (2022). https://doi.org/10.1186/s40798-022-00449-4 find that “Research assessing the effect of</p>	<p>Acknowledged and rejected</p> <p>After reading Di Domenico et al. (2022), the authors think that this piece of literature does not provide a comparison between leisurewear and sportswear, but it analyses performance of several items of sportswear. For this reason, the sentence in the text of the PS was not changed.</p>

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		<p>sports clothing on thermoregulation, comfort, and performance during exercise” had “mixed findings concerning the effect of sports clothing to enhance thermoregulation, comfort, and performance in both recreationally active and elite level athletes”. Therefore, we recommend changing the language since sportswear does not necessarily perform highly regarding thermoregulatory properties. Even if that is the case, it is realistic to expect sportswear items to have thermoregulatory properties and, at the same time, comply with ecodesign requirements. Any exception should be duly justified and in that case a high performance in terms of thermoregulation must be certified.</p>	
222	Section 3.2.1; 517-528	<p>We strongly welcome the inclusion of sportswear and workwear in the scope of the preliminary study and we strongly urge including them in the scope of delegated acts setting out ecodesign criteria for textile products.</p> <p>The report states that sportswear should be included when it is an “apparel textile” and does not belong to the list of excluded products. There can be no argument for excluding sportswear based on artificial distinctions on product function. Too wide an exclusion of sportswear from the scope would potentially exclude a huge amount of fast-moving consumer textile products.</p> <p>We do not believe that distinguishing between sportswear and leisurewear is necessary in the context of ecodesign, where minimum requirements are set. A huge amount of fast-moving consumer textile products sold as sportswear is eventually used by consumers for leisure purposes. Given the market share and volumes of sportswear, it is imperative that this is included in the scope, as not to create loopholes and unfair advantages.</p> <p>Lines 520 and 521 state that sportswear could be considered technical textiles due to its high performance in terms of thermoregulation. However, Di Domenico, I., Hoffmann, S.M. & Collins, P.K. in The Role of Sports Clothing in Thermoregulation, Comfort, and Performance During Exercise in the Heat: A Narrative Review. Sports Med – Open 8, 58 (2022). https://doi.org/10.1186/s40798-022-00449-4 find that “Research assessing the effect of sports clothing on thermoregulation, comfort, and performance during exercise” had “mixed findings concerning the effect of sports clothing to enhance thermoregulation, comfort, and performance in both recreationally active and elite level athletes”. Therefore, we recommend changing the language since sportswear does not necessarily perform highly regarding</p>	<p>Acknowledged and rejected</p> <p>After reading Di Domenico et al. (2022), the authors think that this piece of literature does not provide a comparison between leisurewear and sportswear, but it analyses performance of several items of sportswear. For this reason, the sentence in the text of the PS was not changed.</p>

ID	Stated section; stated line	Comment	Answer
		thermoregulatory properties. Even if that is the case, it is realistic to expect sportswear items to have thermoregulatory properties and, at the same time, comply with ecodesign requirements. Any exception should be duly justified and in that case a high performance in terms of thermoregulation must be certified.	
223	JRC question “Do you agree with the approach used for workwear and sportswear?”; Addressed during the workshop on the 18th of March	<p>[...] wishes to address its concerns regarding insufficient homogeneity for common ecodesign criteria between sportswear and lifestyle apparel in terms of technical and performance criteria, material composition, chemical composition, used technologies as well as user behaviour. [...] wishes to address this concern by calling for consideration of specificities of products characteristics.</p> <p>While the industry agrees that certain sportswear products can bear similar characteristics as lifestyle apparel, sportswear is designed and intended to support and increase performance during sports and physical activities, which affects material choice, fabric construction, finishing treatments and used technologies that can result in different performance ranges for ecodesign requirements.</p> <p>For example, certain sportswear would score higher on durability scorings due to the materials chosen for their intended use such as biker shorts. Scoring these on the same scale as lifestyle jeans shorts when it comes to abrasion resistance and protection, would make sportswear score on average consistently higher but entail at the same time comparing two different products with different uses and thereby also risk misleading the consumer. The consumer will expect biker shorts assist them during their cycling exercise tasks in all types of weather and would receive more meaningful information with a durability comparison to other biker shorts rather than jeans shorts. Lastly, when judging these two shorts to the same performance standards, the ambition would be lower, ultimately reducing the sustainability gains that ecodesign standards could bring.</p> <p>For recycled content, e.g. mandatory minimum percentages in high performance sportswear would require different technologies, materials and innovations than for lifestyle apparel. As</p>	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p> <p>The authors invite the stakeholder to provide technical parameters that allow the distinction between sportswear and leisurewear. This will be very helpful in the distinction suggested by the comment.</p>

ID	Stated section; stated line	Comment	Answer
		<p>these functional garments have to achieve a certain performance under increased strain it is important to ensure the same functional fibre strength as well as availability of secondary material. If the specific function of the product is not taken into account when setting recycled content targets and defining allowed recycled content materials (in case of open loop versus closed loop) the result may be a less performing garment with a negative impact on consumers and sustainability due to earlier discarding based on reduced function.</p> <p>Similar challenges and differences can be observed in a multitude of sportswear and lifestyle comparisons. Additional examples include:</p> <ul style="list-style-type: none"> - sports bras vs lifestyle bras, - fashion bathing suits vs performance sports swimwear, - fashion leggings vs performance yoga pants <p>As mentioned by the JRC in the 1st milestone study, lines 445 – 447 “the specific function of a product requires specific tests to be performed on the product to verify its performance” which is applicable to listed above types of products.</p> <p>Lastly, user behaviour and product care regarding sportswear also differs. For example, more frequent laundering of sportswear can be assumed including laundering after a single use as more common than for lifestyle apparel. Furthermore, purchase behaviour is also influenced by the garments ability to achieve certain performance expectations, which is not the case for lifestyle apparel (notably examples such as sports bras and performance swimsuits).</p>	
224	3.2; Question Workwear and sportswear (in	Workwear and sportswear (in general, those products which are differentiated on the basis of functionality) should be evaluated under a sub-category and have additional specific criterions for durability, safe usage and health etc.	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the</p>

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	general, those products which are differentiated on the basis of functuality) should be evaluated under a sub-category and have additional specific criterions for durability, safe usage and health etc.		<p>relevant product aspects, in accordance with Article 5 of the ESPR.</p> <p>The authors invite the stakeholder to provide technical parameters that allow the distinction between sportswear, workwear and leisurewear. This will be very helpful in the distinction suggested by the comment.</p>
225	3.2.1.; 517	<p>[...] supports and reinforces the importance of including workwear and sportswear in the scope of the study. Those segments will benefit from ecodesign requirements, given the fact that they make up a significant part of textile products with a shorter usage duration. This is due to the specific garment use, material nature, fabric type, and design requirements of both workwear and sportswear. These products are often made from valuable fibres and have high feedstock volumes. For instance, most workwear and sportswear items are multilayer (meaning double material content compared to normal apparel, such as a shirt). These products should therefore remain in the scope of this preparatory study with the same ecodesign requirements. This will ensure that they are designed for recycling and will lead to higher volumes of feedstock available for textile-to-textile recycling.</p>	Acknowledged
226	3.2.1.; 517	<p>Line 517, The terms “workwear” and “PPE (personal protective equipment)” should be defined more clearly. Textile-based PPEs can also be classified as workwear in some sources. This may cause confusion and wrong data collection. In line 539, it is stated that PPEs are excluded from the scope. However, workwears are in the scope. The difference between terms and products should be clearly stated.</p>	Rejected PPE are clearly defined by the Regulation (EU) 2016/425. Workwear are apparel used to perform a specific work. The authors of the PS

ID	Stated section; stated line	Comment	Answer
			invite the stakeholder to suggest improvement of the current definitions.
227	3.2.1; 517-528	<p>5. Do you agree with the approach for workwear and sportswear? Why?</p> <p>We agree. Completely impossible to define/distinguish workwear and sportswear from regular ones. They should all be subject to the ecodesign requirements.</p>	Acknowledged
228	3.2.1; 520	Will this mean that sportswear falling under a categorization as "technical" would not be included in the scope of apparel? All sport apparel products should be included in the DA, why exemptions should only be set in very rare instances, see comment for line 306	<p>Clarification provided</p> <p>Lines 517-519 report that sportswear are inside the scope of the PS.</p>
229	3.2.1; 520-523	There should be separation between sportswear with technical features and leisure sportswear. [...] suggested relying on the function and intended use as claimed by the manufacturer and considers that sportswear which has technical functions as the most important should be excluded from the scope.	<p>Acknowledged</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p> <p>The authors invite the stakeholder to provide technical parameters that allow the distinction between the following groups:</p> <ul style="list-style-type: none"> - sportswear that has technical functions, - sportswear that has not technical functions, - leisurewear. <p>This will be very helpful in the distinction suggested by the comment.</p>
230	3.2 Proposed scope; 520 - 523	[...] wishes to mention that the referred CEN/TR 16422:2012 technical report is not a common standard among the sporting goods companies for differentiation of sportswear product, and while it presents a good overview of functionalities, in line with [...]’s proposal to address such functionalities as wicking and waterproofness technology, ultraviolet protective performance, anti-microbial performance and air permeability and breathability, it should be rather considered as a starting point that requires further adaptation as the specificities of the technical sportswear go beyond its thermoregulatory aspects.	<p>Acknowledged</p> <p>The authors invite the stakeholder to suggest further standards that allow a better description of the sportswear.</p>

ID	Stated section; stated line	Comment	Answer
		For example, technical textiles developed for sportswear fulfil a range of additional different functions such as: abrasion and injuries prevention (e.g. scraping, brush burning.) as well as precise fitting requirements allowing consumers to engage in physical activity while garments remain safe and firm without the need for adjustments during exercise.	
231	3.2.1 Products included in the scope // 3.2.2 Products excluded from the scope; 520 (517 - 528) // 539-540	<p>Clarifying definitions and scope: A broad coverage of eco-design measures will be critical to ensure the largest environmental impact reduction and circularity improvement potential in the textile and apparel sector. We agree with firstly regulating eco-design requirements for apparel but see no justification for any exclusion of or delay for apparel with thermoregulatory functions from the Apparel Textiles Delegated Acts scope. For instance, sportswear is in the majority of cases designed to support leisure exercises which is not a justification to cause ecological harm. The preparatory study should consider including apparel with functional properties e.g. sportswear, outdoor wear (properties such as water repellence or insulation), into the definition of apparel textiles. Exposure to thermally critical environments for sport and outdoor activities is a voluntary leisure activity that should not be at the price of environmental impact – this must also apply to the niche of professional sports and outdoor apparel. Moreover, there are sufficient material alternatives on the market that have proven to meet all thermodynamic properties required to do sport under extreme conditions while being compliant already today with all environmental requirements envisaged in the Apparel Textiles Delegated Act, and thus should not justify an exemption. The same logic applies for workwear – we highly support inclusion of workwear in the Apparel Delegated Act scope. In this product segment, the potential for applying mandatory green public procurement is especially high when it comes to diving recycling and circularity improvements. Furthermore, a generic exclusion would disadvantage those actors that have already heavily invested in environmental solutions for PPE.</p> <p>Exemptions: Where justified exemptions from the scope can be identified, those should be considered. E.g. we support the exclusion of apparel textiles identified as personal protective equipment (PPE) in accordance with Regulation (EU) 2016/425.</p>	Acknowledged
232	3.2.1; 521	We studied the technical CEN report on thermoregulatory properties referred to in footnote 27, and would like to give the following main comments:	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>The first issue is related to how "Water penetration resistance" is captured in any of the tables where it is called out "Woven fabrics, waterproof" (i.e. Tables 3, 6 and 7).</p> <p>Currently, 400 is listed as being very good, which is below what the industry would even consider acceptable for waterproofness.</p> <p>We would propose that $WR \geq 1500$ cm H₂O (or even 2000) is considered very good, 1500 (potentially 2000) $> WR \geq 1000$ is considered good, and $1000 > WR \geq 500$ is considered acceptable - if the garment is calling out waterproofness. Also, the industry (and product labeling) tends to use mm H₂O, not cm H₂O.</p> <p>The units for "Air permeability" are mislabeled. For the numbers listed, they should be in l/m²/s.</p> <p>In Table 7, are the numbers listed for "water vapour resistance" for "Waterproof fabrics" considering the waterproof material itself, or also capturing additional layers? An Ret ≤ 22 seems high for just the waterproof material.</p> <p>Both Spray and Bundesmann are listed for the "Water repellence" property, but both have the same threshold for very good, good, and acceptable. In reality, Bundesmann allows a much better differentiation, whereas Spray is very easy to pass. The way it reads, we would worry that companies will just use the cheaper, similar, and much easier to pass spray test.</p> <p>We would offer to give more in-depth views on the technical report PD CEN referred to in footnote 27 on thermoregulatory properties, if the JRC is interested.</p>	

ID	Stated section; stated line	Comment	Answer
233	3.2.1 Products included in the scope; 524-526	<p>Regarding workwear, those garments are already one of the most sustainable, durable and repair-friendly textile products today. [...] finds a little unusual that the JRC combined workwear with the same category of sportswear, as such [...] would strongly encourage to exclude all types of workwear ' and especially:</p> <p>General-purpose workwear,' which prevents private clothing from soiling at the workplace, without any other specific function.</p> <p>Occupational clothing: specific workwear with special details for the respective activity or target group, e.g., guild clothing, combat clothing, military/defence and duty wear etc.</p> <p>Occupational clothing that protects the patient. Medical products, such as surgical clothing</p> <p>Protective clothing that protects the product. Examples are cleanroom, EPA, GMP or HA Personal protective equipment that protects the wearer from health or safety risks (already excluded)</p>	<p>Rejected</p> <p>Considering that PPE are already out of the scope of the PS, the authors of the PS invite the stakeholder to suggest technical parameters and values to distinguish textile apparel included in the scope and workwear that the stakeholder suggests to exclude from the scope of the PS.</p>
234	3.2.1; 524-526	<p>[...] stresses the need to clearly define which type of workwear falls within the scope and which not. It is suggested including 'General-purpose workwear,' defined as preventing private clothing from soiling at the workplace, without any other specific function.</p> <p>Excluded from the scope should be the following:</p>	<p>Rejected</p> <p>The categorization of the products in the scope is assessed in Task 4, which reports an analysis of product technologies in the context of the relevant product aspects, in accordance with Article 5 of the ESPR.</p> <p>Considering that PPE are already out of the scope of the PS, the authors of the PS invite the</p>

ID	Stated section; stated line	Comment	Answer
		<p>Occupational clothing: specific workwear with special details for the respective activity or target group, e.g., guild clothing, combat clothing, military/defence and duty wear etc.</p> <p>Occupational clothing that protects the patient. Medical products, such as surgical clothing, with single use purposes.</p> <p>Protective clothing that protects the product. Examples are cleanroom, EPA, GMP or HACCP.</p> <p>Personal protective equipment protects the wearer from health or safety risks (already excluded).</p> <p>Additionally, for the type of workwear that falls in the scope, different level of performance requirements may be required as compared to garments. For instance, on physical durability, fabric strength on workwear pants may differ from jeans. This relates to the general need to set the criteria based on function and intended use.</p>	<p>stakeholder to suggest technical parameters and values to distinguish textile apparel included in the scope and workwear that the stakeholder suggests to exclude from the scope of the PS.</p>
235	3.2.1; 524	<p>while workwear apparel textiles might have similar features as general apparel textiles, the user behaviour is certainly different (e.g. washing by specialised textile care organisations versus home washing - regular repair versus no or exceptional repair - corporate identity versus fashion - ...)</p>	<p>Acknowledged</p>
236	3.2.1; 524-526	<p>There needs to be a clear understanding, which workwear is included in the scope, and which is not. Technical quality requirements for workwear in general are often much stricter than for everyday apparel, and for this reason it is difficult to apply same requirements as for consumer apparel. Also, for workwear the intended use and especially industrial cleaning processes are very different from consumer apparel.</p>	<p>Acknowledged</p> <p>Lines 527 and 528 report that the inclusion of workwear will be reassessed in Task 6, when ecodesign options will be proposed.</p>

ID	Stated section; stated line	Comment	Answer
237	3; 527	<p>If after reassessment workwear will be excluded from the scope, what will this mean for chapter 8 public procurement and GPP criteria? Procurement relates for a large part to workwear and also to household textiles (such as towels, bedlinen, table clothes for f.i. hotels and hospitals). See Article 65: "Public Procurement" can only be set for the product aspects addressed in the delegated acts applicable to the product groups. This would mean that GPP criteria cannot be set for products that are not in scope. So we would like to highlight again the need to include workwear and household textiles.</p>	Acknowledged
238	3; 527	<p>Q webinar: Do you think that an initial Delegated Act on apparel textiles could disrupt the supply chain if requirements are not set at the same time also for home/interior textiles and other sub-groups of this product group? Why?</p> <p>It would be disruptive if sportswear and workwear would be reassessed and not be in scope, since as mentioned under 520-526 the distinction between these categories and leisurewear (which is part of apparel) cannot always be made. By calling a product workwear or sportswear the ESPR requirements could then be easily circumvented. This is valid for all products out of scope. Make sure to include sportswear and workwear.</p>	Acknowledged
239	General; General	<p>We propose to broaden the scope of the study and align with the textiles included under the proposed extended producer responsibility on textiles under the revision of the Waste Framework Directive. This include household textile, textile-related and footwear products, as listed in Annex IVc.</p> <p>There are multiple reasons for this:</p> <ul style="list-style-type: none"> - It is expected, that the EPR fees can be modulated on the basis of the ecodesign requirements in ESPR and that producers will be able to report using the same material/data as used in relation to ESPR. This is not possible with the scope suggested in this pre-study. - When EPR is implemented, the producers will report various data on the textiles included. This could also inform the work undertaken in relation to ESPR. - Lastly, the producers will be obligated to financially support research and development in relation to sorting and recycling processes, in particular, in view of scaling up fibre-to-fibre recycling, and to develop durable, reusable and recyclable textiles that do not contain any 	Rejected Other product subgroups are very different from textile apparel. They need to be investigated by specific studies.

ID	Stated section; stated line	Comment	Answer
		substances of concern. This will hopefully bring about both data and new solutions, which can also be aligned/promoted in relation to ESPR.	
240	3.Scope; Genel	<p>We do not agree with the exclusion of the product groups of home/interior/footwear/technical textiles, and are surprised that the exclusion is due to a lack of literature. As we can see in Table 32, page 76, there are many licenses within the product groups Home/Interior Textiles, Textile, Cleaning Products, and Intermediate Products. We suggest that the commission draw on some knowledge from these criteria documents in relation to what can be done to set ecodesign requirements within these product groups.</p> <p>We also propose including all subgroups in the scope of the preparatory study in order to open up for the possibility of setting information requirement to the sub groups with limited data. This will further strengthen the quality and quantity of relevant data for future revisions.</p>	<p>Rejected</p> <p>Section 3 of the PS reports and describes the three criteria used for the selection of the scope. After analysing these criteria (see lines 380-498), the reasons to select textile apparel as products in the scope of the PS was described in section 3.2.</p> <p>Section 7 of the PS analyses the EU Ecolabel criteria and explains the different approach to be used in the PS within the mandatory framework of the ESPR.</p>
241	Products included in the scope; 529	Article 12 should be more complete to define parts of animal and the type of animal, for example: bovine leather, rabbit fur, etc	<p>Clarifications from the stakeholder are needed</p> <p>The authors do not understand the comment. The stakeholder can submit clarifications in the next consultation.</p>
242	3.2.2; 530	<p>The suggested products excluded from scope raises two reflections:</p> <ul style="list-style-type: none"> • "Smart textiles" need a much more defined scope as it is not defined what is meant by "sensors", so it should be further explained and followed up with examples • Aspects related to customized apparel textiles and upcycled textiles; when looking further into this please be very diligent in defining when the "customized" applies; there is a big difference if this is done in a more automated way (like a consumer ordering a piece with e.g. initials) or if pieces are being tailormade. Putting a print on a garment should not be enough to be excluded from ecodesign, here ecodesign could be inspired by the same principles as the product safety regulation 	<p>Acknowledged</p> <p>The authors invite the stakeholder to provide suggestions to improve the current definition and reference to "smart textiles".</p>

ID	Stated section; stated line	Comment	Answer
243	3.2.2; 530-548	[...] agrees with the list of excluded products, since they are very different in terms of their function and physical characteristics. Additionally, these products have different end-of-life management, which is an element that needs to be considered when setting eco-design requirements for product groups.	Acknowledged
244	3; 530	As it is the case of apparel identified as medical device or protective equipment, covered by product-specific legislation, toy disguise costume covered by the TSD and having a different function than regular apparel textiles should also be excluded from the scope of the delegated act. More investigation is needed i.a. of the user behaviour and the testing methods to check the performance of the products. In addition, many costumes are accompanied by accessories that are subject in any case to the TSD. Requiring a different set of standards for the costume and the accessories would be costly for the manufacturer and would not provide any added value to the consumer. To conclude, it is more efficient for toy manufacturers that all toy products are subject to the same legislative framework to avoid the jeopardisation of requirements and, taking into account the current state of play, to have toy disguise costumes fully under toy legislation. Once the scope is defined (again, HS codes would be a clearer solution), toy disguise costumes should be explicitly outside the scope of this delegated act.	Accepted Toys, as defined in the Directive 2009/48/EC on the safety of toys, are outside the scope of the PS. The text of the PS was updated.
245	3.2.2; 531-542	We support the list of product categories our of scope. In addition, military and defense apparel should be excluded.	Rejected The authors invite the stakeholder to motivate their suggestion with arguments related to ecodesign requirements under the framework of the ESPR.
246	3.2.2; 532	Are fur and leather included or excluded from scope? Maybe good to mention explicitly	Rejected The PS focuses on textile products that are defined in section 2. Fur and leather are materials.
247	3.2.2; 536-538	E-textiles are excluded from the scope of the PS. We would like to clarify if apparel containing Li-Ion batteries (e.g. to produce sound or light) are considered e-textiles or apparel. These pieces will be collected together with other type of apparel and waste management companies are currently facing strongly increased fire incidents caused by lithium batteries in waste collection, sorting or recycling plants where they are not expected. This in causing enormous economic damage to waste management plants due to the fires, but also issues with insurance companies no longer wanting to insure the plants. Batteries integrated in apparel should be banned as soon as possible through ecodesign criteria .	Clarified Textile apparel having batteries as component are excluded from the scope of this PS. A footnote was added to the text of the PS.

ID	Stated section; stated line	Comment	Answer
248	3.2.2; 539	<p>we support the exclusion of PPE from the scope of the study and thus from the priority for textiles. This should be the case for all 'green deal' legislation to keep consistency and take into account the different functionality of these products. However, it should made clear that this also includes protective footwear and all other types of PPE that fall under the definition of textiles (including e.g. gloves, masks, fall harnesses, ...). And also to be mentioned are the same products with a similar protective function that are excluded from the PPE Regulation (see Regulation 2016/425 article 2 paragraph 2), such as those specifically designed for use by the armed forces or in the maintenance of law and order; for exclusive use on seagoing vessels or aircraft; ...</p>	<p>Clarification from the stakeholder</p> <p>The author do not understand the arguments supporting the exclusion from the scope of textile apparel designed for use by the armed forces or in the maintenance of law and order. The authors invite the stakeholder to provide arguments to this proposal. These arguments should be put in the context of design options that will be addressed in Task 6 of the PS.</p>
249	3.2.2; 539 ff	<p>According to Section 3.2.2 apparel textiles identified as personal protective equipment (PPE) in accordance with Regulation (EU) 2016/425 are excluded from the scope.</p> <p>First of all, we would like to welcome the acknowledgment of the difference between PPE and general apparel textiles and the exclusion from the scope. However, we believe that the reference to Regulation (EU) 2016/425 narrows the scope of PPE too much. The definition of the term PPE should be broadened to cover all Personal Protective Textiles intended for professional use and exclude them from the scope of this PS.</p> <p>In particular, we would like to highlight that the current wording would not cover protective apparel designed for use by the armed forces or in the maintenance of law and order, since these are excluded from the scope of Regulation (EU) 2016/425 according to Art. 2(2)a) of the Regulation.</p> <p>Further, we believe that all protective textiles intended for professional use should be excluded from the scope of this PS. There are various health and safety risks professional users need to be protected from, where functionalities are not only a question of comfort or enhanced performance, but are essential for their protection and health maintenance.</p>	<p>Rejected</p> <p>PPE is defined in the Regulation (EU) 2016/425. The author do not understand the arguments supporting the exclusion from the scope of textile apparel designed for use by the armed forces or in the maintenance of law and order. The authors invite the stakeholder to provide arguments to their proposal. These arguments should be put in the context of design options that will be addressed in Task 6 of the PS.</p> <p>Until 29 November 2024, the JRC did not receive any additional information from the stakeholder regarding professional uses and corresponding protection needed via clothing, which are not covered by the current PPE definition.</p> <p>About this specific topic, the text of the 1st milestone specify at lines 527-528 that the inclusion of workwear “will be reassessed when the PS addresses task 6 of the MEErP on ecodesign options.”</p>

ID	Stated section; stated line	Comment	Answer
		<p>Because protection for the health and safety of professional users must be prioritized and these textiles face special challenges in terms of eco-design due to their usually high complexity in materials and construction, eco-design requirements for these products must be considered and any consequences in performance must be researched carefully.</p> <p>We will provide the JRC with an overview via email of professional uses and corresponding protection needed from clothing, of which several are not covered by the current PPE definition.</p> <p>As all protective textiles ensure the health and safety of their wearer based on specific functions, eco-design criteria should be evaluated separately and with great care to avoid compromising safety/functionality.</p> <p>Therefore, it should to be clarified that protective textiles intended for professional users are excluded from the scope of this PS.</p> <p>To do so we suggest including the following definition, in addition to the current definition of PPE:</p> <p>Personal Protective Textiles are textile products designed and manufactured to be worn or held by professional users for protection against one or more risks to that person's health or safety.</p>	
250	3.2.2; 539-540	We agree that the textile groups such as smart textiles and electronic textiles should be excluded from the scope. But disagree with the exclusion of the PPE textile subgroup.	<p>Rejected</p> <p>PPE as defined in the Regulation (EU) 2016/425 have a specific function and characteristics that are very different from textile apparel included</p>

ID	Stated section; stated line	Comment	Answer
		<p>We believe that it is important to include PPE, to prevent health risks, among other things. In addition, this group represents a large purchasing volume within the health and care sector, whereby we, with environmental requirements, have a great opportunity to reduce the environmental burden for this textile group.</p> <p>We believe that including PPE in the scope of the PS will allow for possible information requirements in the future, which can strengthen the amount and quality of data for this particular product group.</p>	<p>in the scope of the PS. Other studies can address the ecodesign of the PPE.</p>
251	3.2.2; 543-548	<p>Ecodesign allows setting horizontal requirements for different type of product groups displaying technical similarities allowing a product aspect to be improved (article 5.2). As highlighted in previous comments, BEUC strongly recommends further investigating a modular approach allowing the introduction of minimum requirements for textiles intermediate products and complemented with product specific requirements when relevant. This approach would be more coherent with the current scope of the EU Ecolabel and other legal requirements for textiles (WFD, EPR, TLR).</p>	<p>Rejected Addressing the final products allows to set specific performance and information requirements. Other studies will address product subgroups not addressed by this PS.</p> <p>All intermediate textile products, which are part of the final product in the scope of the PS, are indirectly addressed by the PS.</p>
252	3.2.2; 543-545	<p>Rather than excluding intermediate products (fabrics, yarns, fibers) with reference to their different characteristics depending on what they are used for, should perhaps intermediate products intended/marketed for the uses within the proposed scope be considered? (i.e. apparel, possibly defined by subgroup category). lines 546-548: It seems a bit confusing to state that intermediate products are out of scope, while they would/might still be a matter for ecodesign requirements if/once they are incorporated into apparel. Should it be clarified that intermediate products for apparel are within the scope (of common ecodesign requirements under the delegated act on apparel)?</p> <p>If intermediate products are directly addressed as being within the scope, it would possibly increase the commitment of the producers, which should help increase e.g. information sharing through the supply chain.</p>	<p>Rejected The PS investigates the technical and scientific base to develop the ecodesign requirements for textile apparel, which are final products. This means that economic operators placing on the market final products must comply with the future Delegated Act on textile apparel. Task 6 of the PS will propose design options.</p> <p>The ESPR is the new mandatory legislative tool entered into force in 2024. The Commission is working on developing synergies among ecodesign, EU Ecolabel and EU GPP.</p>

ID	Stated section; stated line	Comment	Answer
		<p>At this stage it's not yet clear to us how many of the ESPR ecodesign aspects will be subject for requirements in the delegated act, and how far back in the supply chain requirements will be posed. Generally though, the more directly the respective actors are addressed, the more likely it seems that the requirements should be effective and proof of their verification efficiently distributed.</p> <p>Also at this stage, as far as we understand, the scope of the EU Ecolabel criteria is still an open question. For synergy between the ESPR-GPP-EUEL though, it's desirable that intermediate products are within the scope of all three instruments. The possibility to label intermediate products have a positive effect on EUEL uptake and efficiency of the licensing processes.</p>	<p>All intermediate textile products, which are part of the final product in the scope of the PS, are indirectly addressed by the PS.</p>
253	Section 3.2.2; 543 - 548	<p>We regret that the JRC has excluded intermediate products (i.e. fibres, yarn, and fabrics) and has instead favoured an approach that seeks to set requirements based on the function of specific apparel end products. We call on the JRC to reconsider this approach and set minimum horizontal requirements for intermediary textiles following the approach of the EU Ecolabel, the Nordic Swan and the Blue Angel. Developing Ecodesign requirements based solely on intended product function ignores that it is the intermediate textile which forms the basis of all the product categories and is therefore fundamental to the end product's performance and environmental impact. As relevant, product-specific requirements can then be developed 'on top' of the material requirements to address specific functional aspects of end products.</p> <p>Setting requirements on intermediate textile products can also resolve inconsistency issues with scope of textile polices. The scope of the Preparatory Study is limited to apparel textiles, and household textiles and footwear have not been included at this stage. However, household textiles and footwear are set to be included in the scope of eco-modulation as part of Extended Producer Responsibility (EPR) schemes – the criteria for which will be set using Ecodesign requirements (see Article 22c in the Parliament's position on the revised WFD. Household textiles are also covered by the scope of Green Public Procurement criteria and the EU Ecolabel, which are set to be made mandatory (GPP) and revised (EU Ecolabel) based on the PS study. To avoid legal loopholes and/or lengthy timelines for the preparation of further Preparatory Studies, these inconsistencies could be resolved through an approach based on the setting of requirements for textile intermediate products regardless of their</p>	<p>Rejected</p> <p>The PS investigates the technical and scientific base to develop the ecodesign requirements for textile apparel, which are final products. Fibres, yarns and fabrics are manufactured according to the final application they will have.</p> <p>The ESPR is the new mandatory legislative tool entered into force in 2024. The Commission is working on developing synergies among ecodesign, EU Ecolabel and EU GPP. Product subgroups not addressed in this PS will be addressed by other studies.</p> <p>All intermediate textile products, which are part of the final product in the scope of the PS, are indirectly addressed by the PS.</p>

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		final function. The PS report itself recognises (line 340) that there are sufficient similarities between home textiles and apparel.	
254	Section 3.2.2; 543 - 548	<p>We regret that the JRC has excluded intermediate products (i.e. fibres, yarn, and fabrics) and has instead favoured an approach that seeks to set requirements based on the function of specific apparel end products. We call on the JRC to reconsider this approach and set minimum horizontal requirements for intermediary textiles following the approach of the EU Ecolabel, the Nordic Swan and the Blue Angel. Developing Ecodesign requirements based solely on intended product function ignores that it is the intermediate textile which forms the basis of all the product categories and is therefore fundamental to the end product's performance and environmental impact. As relevant, product-specific requirements can then be developed 'on top' of the material requirements to address specific functional aspects of end products.</p> <p>Setting requirements on intermediate textile products can also resolve inconsistency issues with scope of textile polices. The scope of the Preparatory Study is limited to apparel textiles, and household textiles and footwear have not been included at this stage. However, household textiles and footwear are set to be included in the scope of eco-modulation as part of Extended Producer Responsibility (EPR) schemes – the criteria for which will be set using Ecodesign requirements (see Article 22c in the Parliament's position on the revised WFD. Household textiles are also covered by the scope of Green Public Procurement criteria and the EU Ecolabel, which are set to be made mandatory (GPP) and revised (EU Ecolabel) based on the PS study. To avoid legal loopholes and/or lengthy timelines for the preparation of further Preparatory Studies, these inconsistencies could be resolved through an approach based on the setting of requirements for textile intermediate products regardless of their final function. The PS report itself recognises (line 340) that there are sufficient similarities between home textiles and apparel.</p>	<p>Rejected</p> <p>The PS investigates the technical and scientific base to develop the eco-design requirements for textile apparel, which are final products. Fibres, yarns and fabrics are manufactured according to the final application they will have.</p> <p>The ESPR is the new mandatory legislative tool entered into force in 2024. The Commission is working on developing synergies among eco-design, EU Ecolabel and EU GPP. Product subgroups not addressed in this PS will be addressed by other studies.</p> <p>All intermediate textile products, which are part of the final product in the scope of the PS, are indirectly addressed by the PS.</p>
255	3.2; Question Do you agree with the exclusion of intermediate products? Why?	<p>It is recommended that intermediate materials, especially fabric, should be included in the scope of the directive and individually meet the requirements within the scope of the directive during sale in the market. The needed standards should be met by either the apparel producer or the fabric producer, depending on the contract signed.</p> <p>It will be very problematic for apparel manufacturers, especially the SMEs, if they asked to make the tests/standards of the fabric they purchased from the market. It should be noted that many fabric manufacturers are already selling their goods with the requested</p>	<p>Rejected</p> <p>The PS investigates the technical and scientific base to develop the eco-design requirements for textile apparel, which are final products.</p>

ID	Stated section; stated line	Comment	Answer
		requirements and it is common that the apparel producer demands the requested tests via their contracts with the fabric manufacturer.	<p>This means that economic operators placing on the market final products must comply with the future Delegated Act on textile apparel. Task 6 of the PS will propose design options. The ESPR is the new mandatory legislative tool (a Regulation) entered into force in 2024.</p> <p>All intermediate textile products, which are part of the final product in the scope of the PS, are indirectly addressed by the PS.</p>
256	3; 543	Before we exclude intermediate products we need an insight how big the market is.	<p>Rejected</p> <p>Section 5 reports the market analysis and the complexity of the supply chain, which includes intermediate products. Intermediate products are not excluded due to their market share, but because the final application of the product requires specific characteristics of the fibres, yarns and fabrics. In the next steps of the PS, the stakeholder will be able to read more about this aspect.</p> <p>All intermediate textile products, which are part of the final product in the scope of the PS, are indirectly addressed by the PS.</p>
257	3.2.2; 543-546	<p>7. Do you agree with the exclusion of intermediate products? Why?</p> <p>I agree. It is difficult to set requirements for intermediate products, when it often is unclear for what function they can/will be used. But we believe that it can be clarified in the text that intermediate products will have an indirect control as it will be required that they for example are recyclable, if the final product is to be recyclable.</p>	<p>Accepted</p> <p>The text was updated.</p>
258	3.2.2 - Products excluded	While the JRC concentrates on product function, the selection of intermediate products is one of the most important choices to consider. Specifically on fibres, it is crucial to recognize that fibre categories are not comparative when considering impacts. This consideration will be necessary for the base case Life Cycle Assessment the JRC wants to	<p>Rejected</p> <p>Intermediate products are excluded from the scope because the final application of the product requires specific characteristics of the</p>

ID	Stated section; stated line	Comment	Answer
	from the scope; 543	develop for the 2nd milestone. Moreover, intermediate products should not be excluded as they can in and of themselves be final product and also an input to the final product.	<p>fibres, yarns and fabrics. Different fibres give specific properties to the final product. The PS will address these aspects in the following steps of the project.</p> <p>All intermediate textile products, which are part of the final product in the scope of the PS, are indirectly addressed by the PS.</p>
259	3; 543	It should be clearer that intermediate products shall be excluded in all applications they may have, unless they are used in products included in the scope of the delegated act. For example, toy manufacturers shall have legal certainty that textiles products used in their production is not subject to the delegated act.	<p>Clarified</p> <p>The text was updated.</p> <p>Textile apparel identified as toys in accordance with the Directive 2009/48/EC are excluded from the scope of the PS.</p> <p>All intermediate textile products, which are part of the final product in the scope of the PS, are indirectly addressed by the PS.</p> <p>Fabric used in toys are not included in the scope of the PS.</p>
260	3.2; 546-548	<p>The [...] is a collaborative multi-stakeholder organisation dedicated to advancing farmer prosperity and ensuring a transparent, resilient, and responsible organic cotton supply chain. [...] supports over 80,000 farmers in [...], facilitating their transition to organic cotton through capacity building, access to resources, and market linkages. [...] has effectively mobilised growing support and investment in organic cotton, which has proven beneficial across our programming areas.</p> <p>[...] strongly recommends the inclusion of specific requirements for natural fibres (intermediate textile products). While our organisation works exclusively with organic cotton, we acknowledge the importance of including other natural fibres to support the EU's sustainability agenda.</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
		<p>We understand that the Preparatory Study (PS) intends to focus on how intermediate materials perform as a component of a finished product and adhere to standards within the context of finished goods rather than as standalone fabrics or components. However, we urge the JRC to recognise the substantial influence material selection holds over the overall sustainability profile/characteristics of the end product.</p> <p>Moreover, this approach carries several risks:</p> <p>1. Tier 4 presents more detailed and potentially severe environmental impacts that are not covered in the previous tiers, such as water eutrophication from excessive nutrient application, Nitrous Oxide (N₂O) production by soil microbial activities, and use of synthetic fertilisers which generate GHG emissions and soil degradation.</p> <p>In fact, the PS addresses negative environmental impact and cotton specifically is mentioned under impacts on land (Section 3.3.2):</p> <p>‘The impacts on land use are mainly generated during the raw material production’. (line 706).</p> <p>‘The fashion and textile industry plays a central role in deterioration of soil quality (Gupta et al., 2022). This is mainly related to the extensive production of natural origin fibres and man-made cellulosic fibres. Some direct examples are given by the excessive grazing of sheep and cashmere goats, the intensive cotton cultivation and the deforestation for cellulose supply, as well as the intensive cotton cultivation with intensive use of agrichemicals (Gupta et al., 2022)’. (lines 610-615)</p> <p>2. As highlighted in the PS, the apparel textiles value chain is global, long, complex, fragmented and opaque, particularly in its initial stages from raw material for fiber production until retailing. Currently, obtaining comprehensive information about a product’s origin is exceedingly challenging. Without setting requirements for intermediate products specifically, tracing the origins and production methods of materials will remain difficult. The</p>	

ID	Stated section; stated line	Comment	Answer
		<p>lack of transparency contributes to challenges in verifying sustainability claims throughout the supply chain. (Section 5.6; Lines 1483-1522).</p> <p>3. Consumers concerned about sustainable production might be skeptical of products that only indicate final product standards without considering the entire lifecycle and production chain of the materials used. Which is consistent with the findings of the PS study regarding `User behaviour and sustainability considerations when buying apparel ` (Section: 6.2.2; line 1726-1730).</p>	
261	3.2.2; 548	<p>The manufacturing of intermediate products cause the majority of the carbon and environmental footprints of the final textile product, not the use phase of the textile product. This may be useful to recognize in the scoping text.</p>	Acknowledged
262	3.2.2 Products excluded from the scope; 549/550	<p>Second-hand apparel textiles should also be the object of careful assessment as regards their exclusion from the scope of upcoming delegated acts, and they should be part of similar policy considerations as upcycled apparel textiles. First, the economic relevance of recommerce is growing steadily. For instance, the penetration rate of second-hand e-commerce users in Europe, which reached 8.9% in 2022, is projected to continuously grow to reach 12.2% by 2027, greatly driven by purchases of pre-loved fashion products (Statista, 2022, Second-hand and vintage fashion in Germany),</p> <p>According to Statista's Second-hand apparel dossier 2022 (https://www.statista.com/study/116165/secondhand-apparel/), the worldwide second-hand apparel market is forecast to hit \$84 billion by 2030 (+\$56 compared to 2020).</p> <p>Second, buying second-hand clothing is perceived to be "good for the environment" by 87% of the respondents to a survey conducted by Statista in Germany (Statista, 2022, Second-hand and vintage fashion in Germany). In fact, b-products markets logically play an important role in allowing the reuse of textile products produced and wore throughout the whole world. The sector's natural contribution to a more circular economy and its worldwide dimension should be recognised and properly reflected in relevant policy instruments.</p>	<p>Rejected</p> <p>The ESPR focuses on the ecodesign of new products. The reuse is one of the product aspects included in Article 5 of the ESPR. The PS will address also this product aspect in Task 4.</p>
263	3.2.2; 549	<p>We find it unclear how much a product needs to be altered in order to be considered customized apparel. Therefore we suggest to define customized apparel further.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
			<p>The stakeholder is invited to propose improvement to the definitions reported in the PS. The comment will be taken into account in the impact assessment.</p> <p>Furthermore, the stakeholder should be aware that “Customised” and “upcycled” textile products are concepts originally present in the Textile Labelling Regulation EU 1007/2011 (TLR) and from there now also in the proposed amendment to the WFD on textiles and here, in the context of the ESPR DA on textiles. Please bear in mind that the concepts need to be aligned throughout EU law. In the context of the current review of the TLR, a statutory definition of these concepts is envisaged</p>
264	3.2.2; 551-562	<p>The preliminary study explains that home textiles such as bed linen, linen textiles bathrobes are excluded from the scope because their functionality differs from apparel textiles, and it would require specific investigations for user behaviour and testing methods.</p> <p>BEUC strongly recommends including such products in the scope of the current Ecodesign preliminary study. Minimum requirements applying horizontally to all textiles could be set as done by the EU Ecolabel, the Nordic Swan Ecolabel and the Blue Angel. This approach would be less time and resource consuming than undertaking later on a separated process to cover such products.</p> <p>Similarly, textiles cleaning products and reusable textile absorbent hygiene products could benefit from minimum horizontal requirements. We would like to underline that the Commission Decision 2023/1809 establishing EU Ecolabel criteria for absorbent hygiene products highlights that reusable textiles absorbent hygiene products are planned to be</p>	<p>Rejected</p> <p>The PS investigates the technical and scientific base to develop the ecodesign requirements for textile apparel, which are final products. Fibres, yarns and fabrics are manufactured according to the final application they will have.</p> <p>The ESPR is the new mandatory legislative tool entered into force in 2024. The Commission is working on developing synergies among ecodesign, EU Ecolabel and EU GPP. Product subgroups not addressed in this PS will be addressed by other studies.</p> <p>All intermediate textile products, which are part of the final product in the scope of the PS, are indirectly addressed by the PS.</p>

ID	Stated section; stated line	Comment	Answer
		specifically investigated for the purposes of the revision of the EU Ecolabel criteria for textiles products.	Reusable textiles absorbent hygiene products were initially addressed, but not included in the scope due to very different technical properties. These technical properties require a specific study, different from this PS.
265	3.2.2; 551-555	[...] supports the conclusion of the JRC to exclude from the scope home textiles, cleaning textiles and reusable hygiene products, due to different properties. These products require specific studies.	Acknowledged
266	3.2.2; 551-555	Setting eco-design criteria in the future for home textiles is supported. These products are an excellent outlet for textile recycling and eco-design criteria for these products will contribute to industrial symbiosis.	Acknowledged
267	page 19 chapter 3.2.2; 551-562	Could you please indicate what is intended with the product groups that are not excluded from the scope but are also not included in the PS (e.g. home and interiors textiles)?	Clarification from the stakeholder needed The authors do not understand the question. The authors invite to reformulate it and submit it in the next consultation.
268	3.2.2; 560-562	[...] supports the exclusion of reusable textile absorbent hygiene products, due to their consideration as technical textiles.	Acknowledged
269	Scope Q&A (18 March online consultation); Slides page 18	<p>3. Do you think an initial Delegated Act on apparel textiles could disrupt the supply chain if requirements are not set at the same time also for home/interior textiles and other sub-groups of this product group? Why?</p> <p>An initial Delegated Act that only focuses on apparel textiles without considering home/interior textiles and other sub-groups within the product group could potentially disrupt the supply chain. This could impact recycling processes, as the inclusion of home textiles in existing recycling processes may not be adequately addressed. Additionally, substances that hamper recycling could pose a problem, particularly if there is no differentiation in sorting between apparel and home textiles, such as curtains, bed sheets, and towels, as they have different feedstock.</p>	Rejected The quotation focussed on supply chain. The stakeholder reports a potential issue due to recyclability of textile products in general. In particular, the issue presented by the stakeholder concerns the capabilities of sorting facilities, which cannot directly regulated under ESPR. Recyclability is one of the product aspects that are assessed in the following steps of the PS. The authors invite the stakeholder to follow the next steps of the PS and flag potential problems due to the missed ecodesign of home/interior textiles.
270	3.2; Workshop Question -	We highly welcome to recognize the need to develop eco-design measures based on product functionality and intended product use. This will be critical when understanding and weighing trade-offs between eco-design measures such as e.g. durability vs recyclability. We therefore	Acknowledged and clarified The suggestions regarding specific function of the textile apparel will be taken into account

ID	Stated section; stated line	Comment	Answer
	Do you think the scope is correctly defined?	<p>agree that the apparel textiles are the most suitable subgroup to be addressed by the Preparatory Study & future Delegated Act as this will ensure the development of common eco-design requirements. It is critical to ensure a broad coverage of products to ensure the level playing field in the upcoming eco-design measures, we therefore also welcome the inclusion of sportswear.</p> <p>will be critical that definitions applied are clear and do not allow for interpretation. How the definitions are written now, it could potentially create a loophole for garments that have a functional property (eg. outerwear, sportswear). This must be avoided. i.e we recommend including functional textiles into the definition of apparel textiles: e.g. many garments (outerwear, sportswear) have specific functional properties added to them that are key for the intended use of the product and that will affect the product's service lifespan if not sustained/durable. E.g. water proofness, water repellence and communicated insulation values. In cases where such a functional claim is made, a functional test should be performed to secure the claimed property/value.</p> <p>Based on the proposed definition, technical textiles should not be excluded from the scope as there is too much overlap between the definition on apparel and technical textiles. Also, it is not possible to define/exclude technical textiles based on their non-aesthetic intention as this is highly subjective if a garment is aesthetical or not. To whom is it aesthetic/non-aesthetic? Only where very clear exemptions can be determined, those should be excluded from the scope of the Delegated Act e.g. PPE, medical devices, e-textiles/smart textiles.</p> <p>However, some eco-design requirements will have to be adapted to each product category/segment, meaning that level of performance, tests, value, threshold or even exceptions should be adapted to each product category if technically needed. . In some cases, the product segmentation will likely have to be adapted to allow for the most effective implementation of the eco-design requirement e.g. recycled content.</p>	<p>when information requirements will be addressed in the following steps of the PS.</p> <p>The new text specifies that technical textile apparel is included in the scope of the PS.</p>

ID	Stated section; stated line	Comment	Answer
		We agree with keeping the requirements for home textiles separate from those for apparel, as they both have different use cases, durability requirements as well as composition.	
271	3; Additional question on home textiles	We believe it would not create supply chain issues, should home textiles be excluded from the scope of the preparatory study. Home textiles work with different suppliers than for apparel so this would not be so disruptive as they are mainly different supply chains. We would however like to caution that in order to create alignment with the scope under the revised Waste Framework Directive and future eco-modulation requirements under Extended Producer Responsibility schemes. The anticipated eco-modulation rules should be based on eco-design requirements, therefore it will be critical to advance the preparatory work on home textiles as well.	Acknowledged
272	3.2; Question Do you think that an initial Delegated Act on apparel textiles could disrupt the supply chain if requirements are not set at the same time also for home/interior textiles and other sub-groups of this product group? Why?	<p>It is true that not all the fabrics are favorable for clothing production and there are specific features of the fabrics for home textiles both in terms of performance and design. On the other hand, if a certain type of fabric is favorable for manufacturing of both the clothing and home textiles, the manufacturer of this fabric will inevitably provide the required performance requirements.</p> <p>So, it is advised that, the performans criterions should be set for the fabric, meaning the fabric should be within the scope of the same delegated act; and it will be feasible for the functioning of the value chain if the "manufacturer of the fabric" is also obliged to provide these requirements within the market.</p> <p>As a matter of fact, the inclusion of textile raw materials (especially fabric) to the scope of the delegated act is believed to be necessary and depending on the supply chain conditions, the tests required with the delegated act should be done either by the fabric producer or the final product provider.</p> <p>Concerning the technical products, the value chain differs somehow, and their performans requirements are also different, a seperated delegated act for these types of products may be possible.</p>	Acknowledged
273	N/A; N/A	The working document does not consider the peculiarities of disguise costumes that, according to the answer given by the JRC team during the Workshop in March, are meant (in	Accepted

ID	Stated section; stated line	Comment	Answer
		<p>principle) to be in the scope of the delegated act. Besides their function and use frequency, that already mark a clear difference with regular textiles apparel, disguise costumes can be subjected to different regulatory frameworks according to their final user. In fact, if the product is "designed or intended, whether or not exclusively, for use in play by children under 14 years of age, they should be classified as toys and they have to comply with all requirements of the Toy Safety Directive [TSD] 2009/48/EC" (See EC guidelines: https://ec.europa.eu/docsroom/documents/5853/attachments/1/translations), soon-to-be Toy Safety Regulation [TSR]. Instead, costumes for adults are classified only as textiles apparel. Concretely, if manufacturers produce the same costume in different sizes for adults and children), they will have to i.a. affix the CE marking and test according to EU standards (EN 71) the sizes fitting children under 14.</p> <p>Taking into account the revision of the product-specific requirements that will impose even stricter rules for the sector - the TSR is under negotiations and is expected to enter into force next year - the toy industry fears that extending general textiles apparel ecodesign criteria to toy disguise costumes will hamper compliance with existing and future toy safety provisions, and is keen to require the exclusion of such products from the scope of this delegated act. The next comments will provide further evidence to our concerns, and we remain at your disposal should you require additional information.</p>	The new text excludes textile apparel identified as toys in accordance with the Directive 2009/48/EC
274	3.3; 563-713	<p>Niinimäki. Recycling and Lifetime Management in the Textile and Fashion Sector. 2023</p> <p>Niinimäki, Dahlbo, Peters & Perry. The environmental price of fast fashion. 2020</p>	Acknowledged
275	3.3; 575	<p>Here 5) Future demand potential and improvement potential of the novel materials and technologies would make sense to be considered as one of the items for validation. If in the conventional solutions it might be difficult to find overall sustainable solution, it could be possibly found in the novel routes.</p> <p>Therefore the proposal is to recognise novel fibres as one category to be analysed and considered within the coming criteria, as they do not necessarily fit under the conventional categories</p>	<p>Rejected</p> <p>This stage of the PS is not suitable to address potential future developemnts, which will be addressed in Tasks 6 and 7 of the PS.</p>
276	3.3.1 Composition of life-cycle stages;	For effective delivery of EU environmental strategies, it is vital the JRC recognises and accounts for the clear difference in system boundary between products made from natural materials and products made from fossil fuel-based raw materials. Without this correction, ESPR will actually promote increasing fast fashion, solid waste to landfill (non-	<p>Acknowledged</p> <p>Environmental and economic assessment will take place in Task 5 of the PS.</p>

ID	Stated section; stated line	Comment	Answer
	General Comment	<p>biodegradable), release of microplastics, depletion of resources and other harmful impacts of fossil-fuel-based clothing, by promoting synthetic clothing as the most sustainable clothing type.</p> <p>The impacts of forming natural fibres on a farm are fully accounted for in LCA-based methods like PEF, while the impacts of forming fossil fuels are not. With raw oil considered to have an environmental impact of zero, the raw material sourcing stage of fossil fuel-based clothing is always far smaller than for products made from natural fibres – resulting in a significantly biased and inequitable comparison.</p> <p>Wiedemann et al 2022, shows that when the raw material for polyester (PET) is grown on a farm, 60 times more land and 27 times more water are used, as well as generating 90% more greenhouse gas emissions, than PET sourced from fossil fuel.</p> <p>Inclusion of the Ellen MacArthur Foundation’s Material Sourcing Index, together with appropriate weighting, may be sufficient to correct for the system boundary difference - creating a more level playing field across fibres and importantly, helping deliver vital EU environmental strategies.</p> <p>Source: Wiedemann, Stephen & Nguyen, Quan & Clarke, Simon. (2022). Using LCA and Circularity Indicators to Measure the Sustainability of Textiles—Examples of Renewable and Non-Renewable Fibres. Sustainability. 14. 16683. 10.3390/su142416683: https://www.researchgate.net/publication/366233370_Using_LCA_and_Circularity_Indicators_to_Measure_the_Sustainability_of_Textiles-Examples_of_Renewable_and_Non-Renewable_Fibres</p>	
277	3.3.1; 579	In addition to natural fibers and synthetic fibers, there exist also metal threads, and paper threads made from paper. Fabrics made by paper yarn also exist and used in clothing, and	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>metal threads as sewing threads and blended threads to reduce static electricity in clothing.</p> <p>Paper thread sample:</p> <p>https://www.kumojyo.co.jp/kamiito/index.html</p> <p>Metal thread sample;</p> <p>https://www.n-seisen.co.jp/products/metal-fiber/</p>	
278	3.3.1; 587	Page 20: In order to avoid confusion, the term generally used is man-made fibres (ISO). Chemical fibres are a kind of man-made fibres. Chemical fibres are always man-made.	<p>Rejected</p> <p>The classification and terminology reported in the PS is taken from the last BREF on textiles, which is the result of the consultation with many stakeholders. The JRC will use this classification and nomenclature that was already agreed with the industry and other stakeholders. The BREF was published in 2023.</p>
279	page 20 chapter 3.3.1; 587	"Chemical fibers" is not scientifically accurate term because some fibers listed in this category, like lyocell, do not undergo a chemical reaction during production process; rather, lyocell is manufactured through a "physical" process. A more appropriate term, covering all fibers listed, would be "man-made fibers."	<p>Rejected</p> <p>The classification and terminology reported in the PS is taken from the last BREF on textiles, which is the result of the consultation with many stakeholders. The JRC will use this classification and nomenclature that was already agreed with the industry and other stakeholders. The BREF was published in 2023.</p>
280	page 20 chapter 3.3.1; 588-589	The term "natural polymer fibers" is misleading. Regenerated cellulose fibers (e.g. lyocell, viscose, modal) contain unaltered cellulose in its pure form, while acetate, by the end of the process, contains modified cellulose, which no longer qualifies as a natural polymer.	<p>Rejected</p> <p>The classification and terminology reported in the PS is taken from the last BREF on textiles, which is the result of the consultation with many stakeholders. The JRC will use this classification and nomenclature that was already agreed with the industry and other stakeholders. The BREF was published in 2023.</p>

ID	Stated section; stated line	Comment	Answer
281	3.3.1; 593-595	<p>593-595 Wet processing stage is not mentioned at this stage, however included in Table 7 (602) --> Inconsistency</p> <p>Also strengthened in 703: Climate impacts are mainly generated during the processes of bleaching / dyeing and finishing</p>	<p>Rejected</p> <p>As reported in Table 7, finishing processes, including wet processing, can occur at yarn and/or fabric stage, according to the item produced.</p> <p>The aim of this Table is to describe the main processes and stages. There are many exceptions in the production of the numerous products included in the scope of the PS. In this section, a general description is provided.</p>
282	3.3.1 Composition and life-cycle stages & 3.3.2 Main negative environmental impacts; 599-602 & 604 ff.	<p>@ line: 599-602: In Figure 1, filament fibres should be mentioned in the same way as staple fibres.</p> <p>The entry in Table 7 on (8) waste management is written in a backward looking way. Table 7, stage (8) waste management, should also take account of the other European legal initiatives such as the targeted amendment of the Waste Framework Directive. The requirements foreseen therein will significantly change the waste management practices; these dynamic changes should be anticipated and best supported by ecodesign requirements.</p> <p>@ line 604 ff.: Basically, we expect that the environmental impacts will be analysed in more detail in task 5. However, we would like to raise the following points: The summary of main environmental impacts (Table 8) is incomplete. Only limited sources are used for this section, and sources such as the EU BREF are missing in this context. Various sources need to be supplemented so that suitable conclusions for environmental aspects like for climate impacts or fresh water can be drawn about the requirements for the production process.</p> <p>The following examples illustrate the problem:</p> <ul style="list-style-type: none"> • Climate impacts are mainly generated during the processes of bleaching / dyeing and finishing. 	<p>Acknowledged</p> <p>For the sake of simplicity, the new version of the Figure 1 mentions “fibres” in general.</p> <p>This section aims to describe general current stages of the value chain. Future legislative frameworks will be addressed in the following steps of the PS.</p> <p>As the stakeholder reports, this section reports only the main picture of quantified environmental impacts of the consumption of textile apparel. Targeted environmental assessment will be performed in Task 5.</p> <p>The authors cite several times the EU BREF, which is reported as Roth et al. (2023).</p> <p>The authors invite the stakeholder to provide references of the suggested changes in the literature review reported in this section. In this way, more information could be added at this stage and in Task 5 of the PS.</p>

ID	Stated section; stated line	Comment	Answer
		<p>Please replace „bleaching“ with „pretreatment“ and consider other pretreatment steps, like scouring, washing, mercerising, which generate impacts on climate change.</p> <p>Please add raw fibre production, as it generates a major impact on climate change.</p> <ul style="list-style-type: none"> • Fresh water is mainly affected during the use phase, the processes of bleaching / dyeing and finishing, and in raw material production. <p>Please replace „bleaching“ with „pretreatment“ and consider other pretreatment steps, like scouring, washing, mercerising, which generate impacts in fresh water (use and pollution of water).</p>	
283	Page 21 Figure 1; 599	See all the comments for Table 7 (5th comment in this submission)	Acknowledged
284	3.3.1; Figure 1	Include first step in MMCF, production of dissolving pulp (step prior to fiber). Eg. OnceMore from [...] producing a dissolving pulp containing textile waste and renewable wood. The pulp then become a fiber.	Accepted The Figure was updated adding “cellulose based materials”.
285	3; 600	Figure 1. There are additional disposal methods beyond just incineration/landfilling and recycling. Dumpsites and open burning are also methods of improper disposal used in some countries, and it's important to highlight the environmental and health impacts associated with them.	Rejected Figure 1 aims to report the most common value chain of the products in the scope. The problem highlighted by the stakeholder is reported in section 3.3.2 (generation of waste) and section 5.6.
286	3.3.1; 602	Table 7: We do not understand the way the table is set-up and there is lacking a description of filament-fibers in the description of MMCF and synthetics	Accepted Table 7 was updated.
287	Section 3.3.1; Table 7	Manual labour is mentioned as a main resource in confectioning and retailing. We appreciate this mention. We wonder, however, why it is mentioned at this stage and not in others as well. Which criteria have been used? We recommend including it in other stages too.	Clarified Table 7 reports only the main resources, not all of them. The economic and environmental

ID	Stated section; stated line	Comment	Answer
		<p>Furthermore, transport (fuel) is mentioned only as a main resource for retailing. This is very relevant, especially if the products are transported by air cargo – which should be restricted due to its high environmental impacts compared to other means of transportation and is used for no reason other than reducing lead times. Nonetheless, the different production steps may happen in different countries, with the intermediary products being transported from one location to the other. Transport and its impact should be accounted for throughout the production process.</p>	<p>assessment to be carried in Task 5 will include a more complete picture.</p>
288	3.3.1; 602-603, Table 7	<p>(3) Yarn manufacturing needs correction:</p> <p>It is suggested mentioning only techniques and not materials.</p> <p>On the first line, there is a technical error in which the spinning process is defined as ‘ring spinning (primarily for cotton) and open-end spinning (usually for wool). The opposite is correct. There is much more open-end spinning of cotton than for wool.</p> <p>On the second line, alternative wording is proposed:</p> <p>Input: Polymers in solution or as granulates</p> <p>Processes and technologies: Spinning from a solution and melt spinning from granulates.</p>	<p>Accepted Text was changed.</p>
289	3.3.1; 602	Related to Table 7 - finishing processes can also apply to final garments	Accepted

ID	Stated section; stated line	Comment	Answer
			Table 7 was updated.
290	Section 3.3.1; Table 7	<p>Manual labour is mentioned as a main resource in confectioning and retailing. We appreciate this mention. We wonder, however, why it is mentioned at this stage and not in others as well. Which criteria have been used? We recommend including it in other stages too.</p> <p>Furthermore, transport (fuel) is mentioned only as a main resource for retailing. This is very relevant, especially if the products are transported by air cargo – which should be restricted due to its high environmental impacts compared to other means of transportation and is used for no reason other than reducing lead times. Nonetheless, the different production steps may happen in different countries, with the intermediary products being transported from one location to the other. Transport and its impact should be accounted for throughout the production process.</p>	<p>Clarified</p> <p>Table 7 reports only the main resources, not all of them. The economic and environmental assessment to be carried in Task 5 will include a more complete picture.</p>
291	3.3; 602	In a circular model, necessary to include remanufactured material, both yarn and fabric or semi-finished / finished garments.	<p>Rejected</p> <p>The aim of the Table 7 is to describe only the main processes, techniques and resources currently used. The authors understand that remanufacturing is not a common practice in the industry.</p>
292	Page 21-22 Table 7 (1); 602	<p>(1) Stage: raw materials and fiber production are mixed. This section covers not only the raw materials used for fiber production but also the process of fiber production itself. We recommend renaming it to “Raw material and fiber production” accordingly.</p> <p>(1) Input: Cellulose from dissolving wood pulp is used for man-made cellulosic fibers. Justification:</p> <ul style="list-style-type: none"> - Cellulose is a natural polymer; mentioning its use twice is unnecessary. - Wood pulp and dissolving wood pulp significantly differ in quality and market dynamics. Only dissolving wood pulp is suitable for fiber production. - Lyocell is not a chemical fiber; no chemical reaction occurs during the lyocell process. Therefore, it is inaccurate to classify this fiber group as man-made chemical fibers. 	<p>Accepted</p> <p>Text in Table 7 was changed.</p>

ID	Stated section; stated line	Comment	Answer
		<p>(1) Process and technologies: Dissolving pulp, derived from various wood types or other cellulosic materials, undergoes dissolution with the use of chemicals. The resulting solution is then spun into either regenerated cellulose fibers (such as viscose, modal, lyocell) or chemically modified fibers (such as acetate), which are suitable for conventional textile processes. Justification: Wood itself is not dissolved. Instead, it is the dissolving wood pulp that undergoes dissolution.</p> <p>(1) Main resources: We suggest dividing the category of resources into separate sections for synthetic and man-made cellulosic fibers to prevent confusion. Man-made cellulosic fibers do not utilize fossil-based materials as input, except in cases where production facilities rely on them for energy, which is categorized separately in this table.</p> <p>(1) Output: Staple fibers, granulates, filament yarn (In the case of regenerated cellulose fibers, granulates are not involved; instead, the filament yarn is directly spun from the solution.) The term "viscose solution" could be misleading as it describes the solution used in the production of viscose fiber. It is possible that you meant "viscous solution," spelled differently, to accurately depict the solution's viscosity?</p>	
293	Page 22 Table 7 (2); 602	<p>(2) Stage: The section seems to interweave the processes of fiber production and preparation for yarn spinning, leading to confusion. This is particularly evident as the fiber manufacturing process has partly already been mentioned in the "raw material for fiber production" section.</p> <p>(2) Input: We recommend adding another fiber group: man-made cellulosic fibers (or specifically regenerated cellulose fibers, as they are more commonly used in textiles than modified cellulose fibers). The vast majority of regenerated cellulose fibers are staple fibers (>95%, reference: The Fiber Year 2023, Statistical Appendix Production of Cellulosic Fibers in 2022) bearing a closer resemblance to natural staple fibers than granulates.</p> <p>(2) Process and technologies: Regenerated cellulose fibers do not necessitate scouring and cleaning processes. The staple fiber bales are initially opened, followed by carding and drawing. Subsequent steps may vary depending on the spinning technology utilized.</p> <p>(2) Main resources: For regenerated cellulose fibers. Only energy is required. No water is utilized. No additional chemicals are needed.</p>	<p>Accepted Text in Table 7 was changed.</p>

ID	Stated section; stated line	Comment	Answer
		(2) Output: "Viscose solutions" neither represent the output of natural staple fibers production nor the output of synthetic fibers. Regenerated cellulose fiber production yields staple fibers or filament. Similarly, the output of preparation for yarn spinning aligns with that of natural staple fibers.	
294	Page 22 Table 7 (3); 602	<p>(3) Input: The term "viscose solution" may not accurately describe a solution intended for filament production from man-made cellulosic fibers. Filament production from regenerated cellulose fibers follows a process similar to that of staple regenerated cellulose fibers, with the only major difference being that staple fibers are cut to a specific length while filaments are not. It is worth noting that the majority (>95% according to The Fiber Year 2023) of man-made cellulosic fibers are staple fibers rather than filaments.</p> <p>(3) Process and technologies: For regenerated cellulose fibers, the main yarn spinning technologies utilized are:</p> <ul style="list-style-type: none"> • Ring spinning (sub-categories: compact, siro) • Air-jet spinning • Open-end spinning <p>(3) Input: Yarns spun from regenerated cellulose fibers typically require no water and entail minimal chemical input only when followed by knitting. Otherwise, no chemical input is necessary. However, there is an option for yarn dyeing, which involves the use of water and chemicals, though this is more of an exception than the norm.</p>	<p>Accepted Text in Table 7 was changed.</p>
295	Page 22 Table 7 (4); 602	(4) Input: Filament yarns are also utilized for weaving and knitting purposes.	<p>Rejected For the sake of simplicity, the authors prefer to report only yarns, because filament yarns are just types of yarns.</p>
296	3.3.1; 602	In "Table 7. Life-cycle stages of apparel textiles – processes, technologies and resources" only the management of post-consumer waste is included on Stage 8. The management of industrial textile waste from pre-consumer production can also be included in the stages or included in 9.2.8 Waste management or added to all life cycle stages under section 9.2.	<p>Rejected The authours aknowledge that there is also the treatment of post-industrial and pre-consumer waste. Nevertheless, at this stage, synthesis is needed. The different paths of generation and</p>

ID	Stated section; stated line	Comment	Answer
		Microfibre release can also be added to the waste management section or added in all related sections.	treatment of textile waste will be assessed in Task 4 and Task 5 of the PS.
297	3.3.1; 602	In the table (and in several other places in the report) reference is made to "non-woven" while in other instances the term "nonwoven" is used. The latter term is used in CEN EN 29092 and ISO 9092	Acknowledged According to the Oxford English Dictionary, the two terms are synonyms. In the text. The authors use "non-woven", while the word "nonwoven" is kept when reporting the wording of the specific standard.
298	3.3.1; 602	Table 7, stage (5) Confection and stage (8) Waste management, lack information related to remanufacturing. The ESPR states that: 'remanufacturing' means actions through which a new product is produced from objects that are waste, products or components and through which at least one change is made that substantially affects the safety, performance, purpose or type of the product. The definition is broad and needs further clarification in relation to each delegated act under the ESPR. If not - different economic operators working with already existing products, components or waste won't now for sure what legal obligations they have to fulfill (for ex. related to if they fall under the scope as being a producer of new products or not).	Rejected The aim of the Table 7 is to describe only the main processes, techniques and resources currently used. The authors understand that remanufacturing is not a common practice in the industry. Remanufacturing and all the other product aspects reported in Task 5 will be assessed in Task 4 of the PS.
299	Table 7; column 'output'	Only 'staple fibres' are mentioned, while some textile fibres are also continuous filament.	Accepted Table 7 was updated.
300	3; 603	Table 22. Finishing processes can also be performed to garments (final products) not only to yarns and fabrics.	Rejected The authors understand that finishing processes can occur in different stages. The authors prefer avoid any specification.

6.4 Comments from ID 301 to ID 369

Table 7. Comments on section 3 – Scope. From ID 301 to ID 369

ID	Stated section; stated line	Comment	Answer
301	3; 603	Table 7: include recycled content	<p>Rejected</p> <p>The aim of Table 7 is to describe the main processes, techniques and resources of the value chain. Recycled content is a product aspect that will be addressed in the following steps of the PS. The authors understand that recycled content is not a common characteristics of the current value chain of products included in the scope.</p>
302	Section: 3.3.2 Main negative environmental impacts; 604 – 713: general comment on negative environmental impacts	<p>It is imperative that the JRC extends its focus beyond merely identifying the main negative environmental impacts associated with textile production, to also recognising and quantifying the positive environmental contributions that natural fibres offer. Natural fibres, such as cotton, wool, and hemp, often play significant roles in enhancing biodiversity, improving soil health through crop rotation and regenerative farming practices, and sequestering carbon, thereby mitigating climate change. These fibres, grown through agricultural practices offer a renewable resource that, when managed sustainably, contributes to the ecological balance. By incorporating an assessment of these positive impacts, the JRC would provide a more balanced and comprehensive view of the environmental performance of textiles. This approach would not only highlight the potential for natural fibres to contribute to environmental sustainability but also encourage the textile industry to adopt practices that maximize these benefits. Such a holistic evaluation is crucial for developing policies that truly support the transition towards a more sustainable and environmentally responsible textile sector.</p> <p>In this regard, we encourage the JRC to also research on the concept of Nature Positive as this concept is linked to the production of natural fibres and therefore also to a sustainable textile and fashion industry.</p>	<p>Acknowledged</p> <p>As reported in section 1 (methodology), Task 5 of the PS will include an economic and environmental assessment of the products included in the scope. The authors invite the stakeholder to contribute to Task 5 with their knowledge about environmental assessment of natural fibres.</p>

	<p>In a nutshell, the thinking behind Nature Positive is rooted in the ambition to not only halt the degradation of the planet's natural ecosystems but to actively enhance and restore them. This approach goes beyond the traditional conservation ethos of minimizing harm; it aims to create a net positive impact on nature, ensuring that human activities contribute to the flourishing of biodiversity, the regeneration of ecosystems, and the restoration of natural habitats. Nature Positive thinking is underpinned by the recognition that human well-being is intrinsically linked to the health of the natural world, and it advocates for transformative changes in how we produce, consume, and interact with our environment. By prioritizing actions that increase natural capital—such as restoring forests and grasslands, revitalizing soil health, protecting water bodies, and fostering biodiversity—this philosophy seeks to establish a symbiotic relationship between human progress and the natural world.</p> <p>Furthermore, on 19 December 2024, the United Nations, have officially recognised the importance of natural plant fibres in sustainable development by adopting Resolution 78/169, a groundbreaking document that recognizes the importance of natural plant fibres in sustainable development.</p> <p>This resolution highlights the potential of natural fibres to contribute to poverty eradication, food security, and climate action, and it calls for increased investment in the production and processing of these fibres.</p> <p>It also signals a growing global recognition of the sustainability benefits of these materials. It is also expected to have a positive impact on farmers, small businesses, and consumers worldwide. The key points of UN Resolution 78/169 are:</p> <ul style="list-style-type: none"> • Natural fibres are essential for sustainable development. They are renewable, biodegradable, and have a lower environmental impact than synthetic fibres. • The production and processing of natural fibres can contribute to poverty eradication and food security. These activities provide employment and income opportunities for farmers and rural communities. • Natural fibres can help to mitigate climate change. They absorb carbon dioxide from the atmosphere, and they can be used to produce products that reduce our reliance on fossil fuels. 	<p>This section aims only to provide a general picture to let the reader understand specific sections of the 1st milestone. This is reported at the beginning of section 3.3.</p>
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		Supporting resources: UN Resolution 78/169, https://documents.un.org/doc/undoc/gen/n23/416/75/pdf/n2341675.pdf?token=17gK0YkhwnKzFnLdo&fe=true / https://www.naturepositive.org/	
303	3.3.2; 604	<p>This whole paragraph is strongly worded, almost exaggerated. It would be beneficial for the reader that the tone is more scientific. Additionally, it would make sense that the scale of environmental impacts is reflected in the chapter. It is widely considered that climate change is one of the most material environmental impacts, it would be good to portray the importance. Finally, the use of "environmental impacts" is not necessarily reflective of the subtitles in the chapter. For example, use of chemicals is not an environmental impact, neither is generation of waste. However, climate change is an environmental impact. Would be good to sort this out in general. Particularly for water, only the activity is mentioned but not the impact.</p> <p>Biodiversity impacts would be worth mentioning, as they are a genuine environmental impact and material for the textile sector.</p>	<p>Acknowledged</p> <p>As reported at the beginning of section 3.3, the section 3.3.2 provide only a general overview of the negative environmental impacts generated by the consumption of the products included in the scope.</p> <p>The authors invite the stakeholder to provide concrete suggestions to improve the text with further references.</p> <p>As reported in section 1 (methodology), Task 5 of the PS will include the environmental assessment of products included in the scope.</p> <p>The text was changed to better explain the aim of the section.</p>
304	3.3.2; NA	<p>Weigh environmental impacts according to business model and product.</p> <p>When defining the environmental impacts for textile products, it is crucial to weigh them according to the type of company and product.</p> <p>Textile companies differ substantially in their business model as well as the products' purpose and functionality. Depending on where in the supply chain a company operates (manufacturer or retail), who their customers are (businesses, end consumer,</p>	<p>Rejected</p> <p>As reported at the beginning of section 3.3, the section 3.3.2 provide only a general overview of the negative</p>

		<p>the public sector), and what kind of textile products they produce, distribute, sell, lease or rent (garments, interior textiles, accessories, etc.), the environmental impact will vary. [...] therefore calls to make sure that the methodology in calculating the impact, will be taken into account.</p> <p>Example: A laundry service, leasing textiles to a hotel or hospital, will focus on producing textiles of high quality, for it to endure a lot of wear and tear, a lot of washing cycles and not be delicate to stains, etc. Compared to a regular T-shirt, the environmental impact will, for the previously mentioned textile products be higher in the use phase – as amongst others energy in the washing process will be substantially higher than for a garment. At the same time, these kinds of textiles are often being used until they are completely worn out and finally becomes waste. Being aware of, and thus balancing these factors (durability/quality/ functionality) is crucial when defining the impact categories. [...] therefore call for weighing the environmental impact categories depending on the textile product, to avoid any imbalance/biased impact.</p>	<p>environmental impacts generated by the consumption of the products included in the scope. Business models are investigated in section 5.5, as well as in the following steps of the PS.</p>
305	3.3.2; Line 604 to 710	<ul style="list-style-type: none"> - The overall description of the main negative environmental impacts (lines 605 to 609) should be reworded to better reflect the content of this section. The "environmental impacts" is not necessarily reflective of the subtitles in the chapter. For example, use of chemicals is not an environmental impact, neither is generation of waste. However, climate change is an environmental impact. Biodiversity impacts would be worth mentioning, as they are a genuine environmental impact and material for the textile sector. - In the section "Pollution originated from textile fragmentation" (line 670), there is a mix up of what is an impact. This needs to be carefully worded, as so much more research is needed into the health and environmental impacts of microfibers (not just microplastics). It should be highlighted that there is a difference between textile fragmentation and environmental and health impacts. - The main sources of microfiber mentioned (line 673) should be described more specifically and scientifically as it is the main source in wastewater (not in general). - In Table 8 (line 710) the definition of "ecosystem quality" and "human health" should be further elaborated to make clear that the largest material environmental considerations are taken into account and that they reflect the end-impact on ecosystem and human health. 	<p>Acknowledged</p> <p>The text was changed to explain factors influencing negative environmental impacts. As reported at the beginning of section 3.3, the section 3.3.2 provide only a general overview of factors affecting the negative environmental impacts generated by the consumption of the products included in the scope. The authors invite the stakeholder to provide concrete suggestions to improve the text with further references. As reported in section 1 (methodology), Task 5 of the PS will include the</p>

			<p>environmental assessment of products included in the scope.</p> <p>Task 5 will also contain a specific section on the pollution originated from textile fragmentation.</p>
306	3.3.2; 604	<p>In general, the analysis on the impacts of fibres appears tendentious as it only leads to the evaluation of some aspects, while excluding others, such as end-of-life possibilities. For instance, it does not include the potential of natural fibres to be compostable.</p>	<p>Acknowledged</p> <p>The aim of this section is reported at the beginning of section 3.3.</p> <p>The authors invite the stakeholder to propose concrete changes to the text and provide other references, for example studies pointing out at the compostability of textile apparel made of natural fibres.</p> <p>As reported in section 1 (methodology), Task 5 of the PS will include the environmental assessment of products included in the scope.</p>
307	3.3.2; 604	<p>Life Cycle Assessment (LCA) of Recycled Wool Fibres: recycled wool fibres have significantly lower environmental impacts than virgin fibres, even when the most unfavorable scenarios are considered</p> <p>https://www.mdpi.com/2079-9276/11/5/41</p>	<p>Acknowledged</p>
308	3.3.2; 604-699	<p>In this section you will need to explain the environmental impacts! See for example a list of environmental impacts from the PEF methodology! I made some comments below, but this section definitely needs a more specific categorisation:</p>	<p>Rejected</p> <p>The aim of this section is just to provide an overview to the reader</p>

		<p>Impacts on land: What is the impact? Acidification, biodiversity, climate change/loss of carbon sink, soil carbon content, nutrients? This section only describes soil quality and that land is used. Please explain further what the impact is.</p> <p>Use and discharge of water: these are two, very different impacts. But I think this is somehow visible from the text.</p> <p>Use of chemicals: Also here - what is the impact? It could be eco- or human toxicity, it could also be chemical risk, or possibly eutrophication.</p> <p>Use of energy: this is not either a direct impact itself. Mostly use of energy causes climate change impact, but it can also cause other environmental impacts</p> <p>Pollution originated from textile fragmentation: What is the impact? Micro- or nanoplastic release?</p>	<p>about the main factors affecting the negative environmental impacts generated by the textile industry. As reported in section 1 (methodology), Task 5 of the PS will include an environmental assessment based on Life Cycle Thinking approach and using the 16 impact categories of the PEF. Impact categories should not be confused with the evaluation of environmental impacts. The text was changed to better clarify the aim of the section.</p>
309	3.3.2; 604-699 and 701 (Table 8)	<p>Most of the negative environmental externalities referred to in this section and Table 8 are either significantly or entirely removed by the use of organic fibre production on organic farms and by organic processing according to GOTS. This is not referred to in the PS and represents a significant gap that should be addressed. Organic textiles represent a relevant niche, that is capable of being taken to scale. It is in demand by consumers (like organic food) and meets the goals of the Textile Strategy, the Green Claims Directive and the Empowering Consumers Directive. It therefore should be referred to for completeness and for coherence of the PS.</p>	<p>Rejected</p> <p>This section reports the main factors affecting the negative impacts generated by the industry producing textile apparel. Task 6 of the PS will investigate design options that will explore ways to decrease the environmental impacts of the consumptions of products in the scope.</p>
310	3.3.1; 604	<p>We do not understand the way the table is set-up and there is lacking a description of filament fibers in the description of MMCF and synthetics.</p>	<p>Clarified</p> <p>If the stakeholder refer to Table 7 at line 602, this was updated.</p>

		Furthermore, in the table natural fibres are classified as animal origin or natural origin. Innovations that work with agricultural residue as a feedstock are generally labelled as 'flax' as of now due to the nature of the fibre. However, we stress the relevance of including an additional reference to include the source of the fibre as crop residues of hemp/banana.	
311	3.3.2; 604-713	<p>We call on the JRC to include a more scientific tone in the entire section.</p> <p>The fashion industry currently accounts for 2-8% of global emissions, depending on the type of study consulted (the World Resource Institute states 2% (https://www.wri.org/research/roadmap-net-zero-delivering-science-based-targets-apparel-sector), whereas McKinsey and the Global Fashion Agenda declared 4% in their report (https://www.mckinsey.com/~media/mckinsey/industries/retail/our%20insights/fashion%20on%20climate/fashion-on-climate-full-report.pdf)).</p> <p>In addition to climate impacts, it impacts water resources, the production of solid waste, land use, chemical and microfibre pollution, biodiversity and land use impacts, and the depletion of natural resources (https://link.springer.com/article/10.1007/s10603-016-9336-6). Therefore, this section must include references to biodiversity impacts, as they are a genuine environmental impact and material for the textile sector. It is also important to mention water scarcity, as this is the main environmental impact surrounding water consumption. It should be presented that water consumption occurs in water-scarce regions and how this relates to the fashion industry.</p> <p>The UN's Environment Programme has also created a diagram outlining the environmental, social, and economic hotspots of the global apparel value chain, with the largest hotspots identified in textile production (notably for operations related to the bleaching, dyeing, and finishing), and in the use phase of textiles (https://wedocs.unep.org/handle/20.500.11822/34184).</p> <p>In 2020, textile consumption in Europe had, on average, the 4th highest impact on the environment and climate change from a global life cycle perspective (after food, housing, transportation, furnishing, and household goods). It was the consumption area with the 3rd highest impact on water (after food, recreation, and culture) and land use (after food and housing), and the fifth highest regarding raw material use and greenhouse gas emissions (https://www.eea.europa.eu/publications/textiles-and-the-environment-the).</p>	<p>Rejected</p> <p>The section reports scientific references. The section does not aim to compare the textile industry with other industries. The aim of the section is stated at the beginning of section 3.3 and provides only a generic overview to the problem. As reported in section 1 (methodology), Task 5 will include an environmental assessment including all aspects suggested by the stakeholder in their comment.</p> <p>The authors invite the stakeholder to share scientific references evaluating the direct environmental impacts of the textile industry on the biodiversity.</p> <p>As reported in section 1 (methodology), Task 6 will propose the design options to decrease the environmental impacts of the consumption of</p>

		<p>The decarbonisation potential for apparel supply chains by 2030 is estimated as follows:</p> <ul style="list-style-type: none"> • Fibre production emissions could be reduced by 205 million tonnes through improvement in raw material processes and a 40% reduction in chemical use in cotton production; • Spinning, weaving, knitting, and wet processing could achieve 703 million tonnes of GHG emissions savings through renewable energy, efficiency improvements, and shifting to new technologies; • Overall, energy efficiency and a shift from fossil fuels to renewable energy are predicted to have the biggest single benefit across the value chain. At least 45% in energy savings could be gained through energy-efficient production practices, and 39% by moving to renewable energy, with 16% coming from the shift from coal to electric boilers for high-heat processes (i.e. dyeing); • More efficient use phase approaches could reduce emissions by 11% or 186 million tonnes of GHG emissions, while a shift to circular business models could reduce emissions by 9.6% or 161 million tonnes of GHG emissions (https://www.mckinsey.com/~media/mckinsey/industries/retail/our%20insights/fashion%20on%20climate/fashion-on-climate-full-report.pdf). 	<p>the products in the scope.</p> <p>The text was changed to better explain the aim of the section.</p>
312	3.3.2; 604-713	<p>Chemicals are a major input to various processes in textiles, particularly in the cultivation of agricultural raw materials, the processing of raw materials, and the wet processing phase where products are dyed and finished. Chemicals may also have significant GHG emissions from their lifecycle. Reducing chemical inputs to these processes can have significant climate and sustainability benefits but can be challenging due to the dependence many actors have on chemical-heavy processes, and issues accessing reliable data on chemical use and emissions factors. It is essential to use the framework offered by the ESPR to ensure coordination and coherence between the REACH Regulation, with its focus on chemicals safety, and the role of the ESPR framework in ensuring the viability of chemicals in the recycling and circularity process.</p> <p>The paragraph starting in line 670 also uses the terms textile fragmentation and microplastics interchangeably, which is incorrect. The difference should be highlighted. In the paragraph, there is also a mix of what is an impact. This needs to be carefully worded, as so much more research is needed into the health and environmental impacts of microfibres (not just microplastics). It should be highlighted that there is a difference between textile fragmentation and environmental and health impacts, and the sources of microfibres must be described scientifically and specifically. As an example, natural fibres still shed, and could be linked to dyes, chemicals and treatments. Worth mentioning that textile fragmentation occurs while actual use. And that the main drivers are</p>	<p>Acknowledged</p> <p>As reported in Section 1 and the beginning of Section 3.3, the PS will include a specific section in Task 5 where the potential impacts on the environment, ecosystems and human health from the release of microfibres (synthetic microfibres or microplastics, man-made cellulosic fibres (MMCFs) and natural fibres) will be discussed in detail.</p>

		<p>not yet established.</p> <p>The ESPR framework and the setting of the different ecodesign requirements should take into account the complementarity of the different fibres in the circularity, basing the scheme for textiles on a balance built on the potentials of each different type of fibre category.</p>	
313	3.3.2; 604	<p>Concerning main negative environmental impacts - Updated and trustworthy data on a global level is available in this report - Sustainability and Circularity in the Textile Value Chain: Global Stocktaking https://wedocs.unep.org/20.500.11822/34184</p>	<p>Acknowledged The same report is cited in the text as UNEP (2020).</p>
314	3.3.2 Main negative environmental impacts; 605	<p>For the past 20 years, humanity has been producing more and more clothes, with a shorter and shorter life cycle. A considerable proportion of them become waste and are not recycled. Overproduction is largely attributed to polyester textiles made from fossil fuels (https://circulareconomy.europa.eu/platform/sites/default/files/greenwashing-policy-paper.pdf). These textiles are not sustainable, they cause a massive waste problem, and they release microplastics into the environment. Nevertheless, natural fibres from raw materials produced on conventional farms are also associated with a higher negative environmental impact.</p> <p>An alternative are organically produced natural fibres for textiles. This does not only extend to cotton, but to other natural fibres from plant and animal origin, such as hemp, flax, wool or silk. Organically produced natural fibres all have in common that the raw materials are produced on organic farms and according to the same high standards as organic food crops. Natural raw materials from organic farms are produced with respect for the environment, farm workers and farm animal welfare. Also, with regard to the EU ECOLABEL, we believe that the focus should be on organic fibres.</p> <p>In line with what the Ecolabel criteria currently stipulate, organic fibres should mean fibres that have been produced according to an organic production standard as follows: “regulation (EU) 2018/848 (the EU Organic Regulation), the US National Organic Programme (NOP) or equivalent legal obligations set by trade partners of the EU”.</p> <p>[...]. For more than 20 years, we have been and continue representing organic in European policymaking and advocating for a transformation of food and farming. Our work is based on the principles of organic agriculture – health, ecology, fairness and care. [...]</p> <p>[...]: https://www.organicseurope.bio/what-we-do/organic-textiles/</p>	<p>Acknowledged</p>
315	3.3.2 Main negative	<p>We encourage the JRC to review research on GHG emissions of the textile and fashion industry. Bates Kassatly and Townsend have put together a good overview on this topic. See shared resource below, Appendix II on page</p>	<p>Acknowledged</p>

	environmental impacts; 606-608: “The European Environment Agency estimated that the textile industry is the fifth industrial sector for primary use of materials and greenhouse gas emissions, and the third industrial sector for water and land use (EEA, 2022b).”	62. Resource: Veronica Bates Kassatly, Terry Townsend: European Union Ecodesign for Sustainable Products Regulation: Summary of inconsistencies and potential deficiencies in the Preliminary Study on New Product Priorities – with specific reference to Textiles and Footwear: https://www.crdc.com.au/sites/default/files/pdf/CRD23007%20European%20Union%20Regulation%20Mk14.pdf	
316	3.3.2 Main negative environmental impacts; 608: “Additionally, according to Gupta et al. (2022), the fashion and textile sector is the second most polluting in the world after the oil industry”	This claim that the fashion and textile sector is the second most polluting in the world after the oil industry is not substantiated by Gupta et al. (2022). We encourage the JRC to abstain from general unsubstantiated claims and rather consult well researched peer reviewed studies that are more granular by looking at different environmental aspects.	Accepted The reference was removed.
317	3.3.2; 608-9	Gupta et al (2022) is referenced, and this should be removed, for at least 2 reasons. 1. The claim is so broad as to be meaningless given that the impact of every stage of a supply chain is going to be affected by a range of characteristics based on the profile of that location: jurisdiction, type of textile, energy mix, climate, socio-	Accepted The reference was removed.

		economic, political etc. etc. 2. Critically, the claim by Gupta et al that the textile industry is the second most polluting in the world (page 220) is not supported by any references, and therefore provides no evidence to support the claim	
318	3.3.2; 608-609	We recommend to be careful to excessive statements that the fashion and textile sector is the second most polluting in the world after the oil industry. What is actually compared? And how is the calculations made? This particular statement has actually been identified as not having a reliable reference in an article: The Biggest Fake News in Fashion - The New York Times (nytimes.com) The Biggest Fake News in Fashion - The New York Times (nytimes.com)	Accepted The reference was removed.
319	3.3.2; 609 - 611	Fashion and textile sector is the second most polluting in the world after the oil industry? Even though the statement is from a published article, it is not a scientific statement. According to which impact categories? Which pollutants? Also, the oil industry cannot be compared to the textile sector, as oil is used in the textile sector. It would be much better to use the data from BCG where fashion sector is after food production and construction. This would be far more comparable. Oil is produced and used in many different sectors. [...] refers to analysis that has been carried out by trusted organizations that understand the complexity of the industry and use science-based approaches (apparel impact institute, 2023). The wording of this paragraph is very strong "central, extensive, excessive, etc.", and it should be put in context. Sheep also produces leather and meat, and not just wool. There are other drivers for deforestation (e.g. rubber, even if you exclude leather), which should be put into context. The overall paragraph is too simplified, and it would be hugely beneficial to elaborate on this complex topic.	Accepted The reference was removed.
320	3.3.2 Main negative environmental impacts; 610-615: "Impacts on land" paragraph	Gupta et al (2022) make an unsupported claim about land use, stating that "The global dilapidation of soil (...) contributes to the most important hazard worldwide for food security and also adds to global warming. The fashion and textile industry plays a central role in depleting the soil quality in various ways. For instance, overgrazing of grasslands via sheep and cashmere goats upraised for their wool, enormous use of toxic chemicals, deforestation produced by wood-based fibres like rayon'. The validity of these claims requires further clarification. Many natural fibre crops like cotton, one of the most widely grown natural fibres, can be part of crop rotation systems that include food crops, thereby not only preserving but enhancing soil fertility. Crop rotation and intercropping with natural fibres can lead to more resilient agricultural ecosystems, which are less dependent on chemical inputs and more supportive of a variety of plant and animal life. In arid or semi-desert regions, sheep, goats, alpacas and other natural fibre producing animals can graze and be a vital source for food and financial income.	Accepted The reference was removed.

		<p>Globally, millions benefit from natural fibres contribution to food security and income, particularly in developing countries where smallholder farmers grow natural fibre crops such as jute, sisal, and cotton alongside food crops and run fibre producing animals such as sheep and goats. This diversification strategy enhances household income stability and food security. The income generated from natural fibres enables farmers to purchase food, invest in farming inputs, and improve their livelihoods, thereby contributing to the economic resilience of rural communities.</p> <p>The assertion that the textile industry's need for natural fibres depletes soil quality overlooks the potential for holistic land management practices to improve soil health. Farms that integrate crops and livestock in ways that mimic natural ecosystems, can significantly increase soil fertility, biodiversity, and carbon sequestration. Practices such as managed grazing, cover cropping, and minimal tillage in natural fibre production can reverse desertification and enhance the soil's ability to absorb and store carbon dioxide, thus contributing to climate change mitigation. When managed sustainably, natural fibre agricultural businesses can act as carbon sinks, offsetting part of the carbon footprint of the fashion and textile industry.</p> <p>This aligns well with the EU's soil mission. As alluded before, natural fibres are part of a holistic management toolkit to promote soil health, enriching soil fertility, and mitigating erosion. By promoting the use of natural fibres within the fashion industry through legislative pieces such as ESPR, the EU contributes at the same time to its Soil Mission. ESPR may not be viewed in isolation but needs to be developed within the EU's overall context.</p> <p>It's also critical to address the geopolitical and ethical dimensions of sustainable development, particularly in the context of land use and natural fibre production. The EU, while a significant player in the global fashion and textile market, must navigate the delicate balance between advocating for environmental sustainability and respecting the sovereignty of countries e.g. in the Global South, which are the primary producers of natural fibres. These nations possess the sovereign right to determine the best use of their land and resources, in alignment with their developmental goals and the well-being of their populations. Imposing prescriptive land use policies from a Western perspective not only undermines this sovereignty but also overlooks the diverse ecological, economic, and cultural contexts within which these natural fibres are produced.</p> <p>Sustainable practices in the textile industry should focus on collaboration, respecting sovereignty, and mutual benefit. This involves valuing the traditional knowledge of local communities and farmers in the Global South,</p>	
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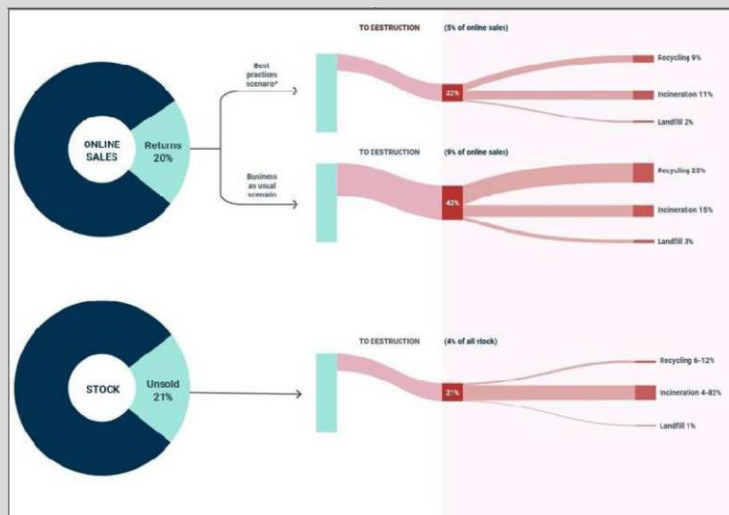
		<p>who have cultivated these lands for generations. Initiatives should be co-created, supporting these communities in enhancing both their livelihoods and the environmental stewardship of their lands. Equitable partnerships can lead to more sustainable and just industry that honours both the planet and the people who clothe it.</p> <p>To achieve the EU’s international commitments to the SDGs, climate agreements and goals on biodiversity and soil health, we believe it is vital that ESPR also consider positive climate impacts offered by the natural fibre industry.</p> <p>V. Bates Kassatly, T. Townsend: European Union Ecodesign for Sustainable Products Regulation: Summary of inconsistencies and potential deficiencies in the Preliminary Study on New Product Priorities – with specific reference to Textiles and Footwear:</p> <p>https://www.crdc.com.au/sites/default/files/pdf/CRD23007%20European%20Union%20Regulation%20Mk14.pdf</p> <p>https://savory.global/science_library/holistic-management-animated-video/</p>	
321	Section 3.3.2; 610-615	<p>Research (Anderson Abel de Souza Machado, Werner Kloas, Christiane Zarfl, Stefan Hempel, Matthias C Rillig (2018) Microplastics as an emerging threat to terrestrial ecosystems, Global Change Biology, DOI: 10.1111/gcb.14020) shows that microplastics is found in soil too, not just in fresh and marine water. Hence, it is important to highlight it in the Sub-section “Impact on land”.</p>	<p>Acknowledged</p> <p>Task 5 of the PS will include a specific section addressing the potential impacts on the environment, ecosystems and human health from the release of microfibres.</p>
322	3.3.2; 610-615	<p>The impacts on the soil caused by oil extraction for the generation of plastics intended for synthetic fibres are not clearly explained.</p>	<p>Acknowledged.</p> <p>The aim of this section is reported at the beginning of section 3.3.</p> <p>As reported in section 1 (methodology) and the beginning of section 3.3, Task 5 of the PS will include the environmental assessment of products included in the scope.</p>
323	Section 3.3.2; 610-615	<p>Research (Anderson Abel de Souza Machado, Werner Kloas, Christiane Zarfl, Stefan Hempel, Matthias C Rillig (2018) Microplastics as an emerging threat to terrestrial ecosystems, Global Change Biology, DOI:</p>	<p>Acknowledged</p>

		10.1111/gcb.14020) shows that microplastics is found in soil too, not just in fresh and marine water. Hence, it is important to highlight it in the Sub-section "Impact on land".	Task 5 of the PS will include a specific section addressing the potential impacts on the environment, ecosystems and human health from the release of microfibres.
324	3.3.2; 611-613	Gupta et al (2022) is referenced, and this should be removed, for at least 2 reasons. 1. The claim is so broad as to be meaningless given that the impact of farming to produce natural fibres and man-made cellulosic fibres is going to be affected by a range of characteristics based on the profile of that location: jurisdiction, soil type, rainfall patterns, climate, socio-economic status of the farmers, political etc. etc. 2. Critically, the claim by Gupta et al that the fashion and textile industry plays a central role in deterioration of soil quality (page 221) is not supported by any references, and therefore provides no evidence to support the claim at a specific regional level let alone globally	Accepted The reference was removed.
325	3; 625	Not only dyes are source of wastewater pollution. Some other chemicals, such as salts used during the manufacturing process, provide textile wastewater polluted characteristic. Indeed, salt is one of the most common used commodities for cotton or cellulosic dyeing and implies a high discharge into wastewater, providing high conductivity which needs advanced (and highly cost) treatments to be removed (i.e. reverse osmosis)	Acknowledged. The aim of this section is reported at the beginning of section 3.3. As reported in section 1 (methodology) and the beginning of section 3.3, Task 5 of the PS will include the environmental assessment of products included in the scope.
326	3.3.2; 630	The text should be clearer on exposure and release pathways (production, wear and tear, washing, waste stage). It should also be clarified that certain hazardous substances are added to apparel to give it certain properties (for example PFAS in rain wear, biocides in sports clothes), dyes etc. These chemicals are gradually released to wastewater during washing. See the English summary of the Swedish Chemicals Agency reports regarding chemicals in textiles and risks for eg the aquatic environment: https://www.kemi.se/download/18.7f56491017e4bf6df761f7/1642175541797/Rapport-4-21-	Acknowledged. The aim of this section is reported at the beginning of section 3.3. Task 5 of the PS will report a detailed assessment about chemicals in the products included in the scope.

		<p>Kartl%C3%A4ggning-av-farliga-kemiska-%C3%A4mnen-i-textil-uppdaterad-22-01-14.pdf</p> <p>Reports in English of the Swedish Chemicals Agency on chemicals in textiles and risks for eg the aquatic environment: https://www.kemi.se/download/18.6df1d3df171c243fb23a98e7/1591454108832/report-8-16-hazardous-chemical-substances-in-textiles.pdf</p> <p>https://www.kemi.se/download/18.6df1d3df171c243fb23a98f3/1591454110491/rapport-6-14-chemicals-in-textiles.pdf</p> <p>Svenskt Vatten report in English: Silver Leaching – A Report on Silver biocides in Sportswear</p> <p>https://vattenbokhandeln.svensktvatten.se/wp-content/uploads/2018/11/report-silver_leaching_1107b.pdf</p>	
327	3; 634	<p>The use of chemicals in apparel textiles extends beyond just the cultivation of natural fibers. Domestic laundry, where these chemicals are released into waterways and soil if sewage sludge is used for fertilization, is another significant source of contamination.</p>	<p>Acknowledged.</p> <p>The aim of this section is reported at the beginning of section 3.3.</p> <p>Task 5 of the PS will report a detailed assessment about chemicals in the products included in the scope.</p>
328	3.3.2; 637	<p>We find it very positive that the assessment not only focuses on hazardous chemicals used in the production phase where they might pose a risk to the environment and workers but also on the fact that remains of those chemicals in the finished textile products might pose a risk to consumers. This is an important aspect especially for clothing, since this is a product group where frequent and prolonged skin contact during the use phase occurs. Furthermore vulnerable groups such as infants and children also wear clothing.</p>	<p>Acknowledged</p>
329	3.3.2; 640	<p>Use of energy. I would recommend this report Life cycle assessment for visualising the use of energy in the different stages of the textile value chain: G.Sandin-Environmental-assessment-of-Swedish-clothing-consumption.MistraFutureFashionReport-2019.05.pdf</p>	<p>Acknowledged</p>
330	3.3.2; 651	<p>The document by the EU Environment Agency, after the publication of the JRC report, shows that the percentage of items incinerated, though only an estimate however, it is desirable the contents of the document contained in the report.</p> <p>“Volumes and destruction of returned and unsold textiles in Europe’s circular economy”, EEA, Published 04 Mar</p>	<p>Acknowledged</p>

2024
<https://www.eea.europa.eu/publications/the-destruction-of-returned-and>

Note; The number introduced by this publication were all estimated value and each breakdown category was different source by source.



Volumes and destruction of returned and unsold textiles in Europe's circular economy EEA.2024
<https://www.eea.europa.eu/publications/the-destruction-of-returned-and>

331	Section 3.3.2; 656-658	As rightly mentioned in the PS report, landfilled textiles may release harmful substances. In addition, it is important to mention that synthetic landfilled textiles may release microplastics (European Topic Centre Circular Economy and Resource Use, Microplastic pollution from textile consumption in Europe, 2022).	Acknowledged
332	Section 3.3.2; 656-658	As rightly mentioned in the PS report, landfilled textiles may release harmful substances. In addition, it is important to mention that synthetic landfilled textiles may release microplastics (European Topic Centre Circular Economy and Resource Use, Microplastic pollution from textile consumption in Europe, 2022).	Acknowledged
333	3.3.2 Main negative environmental impacts; 659 - 669: Emissions	There is no real consensus on this. The IPCC estimates 10%, Bates Kassatly and Townsend have argued that the global GHG emissions of the apparel industry is between 1,8% and 4,8% and the Carbon Trust 0.6% Source:	Acknowledged

	into the atmosphere “The apparel industry is responsible for about 6.5% of global greenhouse gas emissions.”	Veronica Bates Kassatly, Terry Townsend: European Union Ecodesign for Sustainable Products Regulation: Summary of inconsistencies and potential deficiencies in the Preliminary Study on New Product Priorities – with specific reference to Textiles and Footwear: https://www.crdc.com.au/sites/default/files/pdf/CRD23007%20European%20Union%20Regulation%20Mk14.pdf Niinimäki et al. The environmental price of fast fashion, Nature Reviews Earth & Environment, 2020 Volume 1, Issue 4	
334	3.3.2; 659	Here, the increasing impact of the transport of garments should be included. The ever-increasing speed of getting from production facilities into consumer hands is leading new market giants like Shein and Temu, but also established brands and retailers, to rely more and more on air cargo transport, with all repercussions that has on GHG emissions. See https://www.publiceye.ch/en/topics/fashion/zara-fuels-climate-crisis-with-thousands-of-tons-of-airborne-fashion	Acknowledged The Task 5 will report a complete environmental assessment including transportation.
335	3.3.2; 661	Climate impact is also created during use phase of a product. Not an insignificant share.	Acknowledged The Task 5 will report a complete environmental assessment including all life-cycle phases.
336	3; 665	Q webinar: Is there additional evidence to enrich the literature used for the selection criteria? Which are they? See the report: https://www.government.nl/documents/reports/2024/02/02/destinations-of-dutch-used-textiles	Acknowledged
337	3.3.2 Main negative environmental impacts; 670-699 Pollution originated from textile fragmentation 513-514: “This alignment allows the JRC to use the work performed by the project PEFCR A&F	As the EU strides towards implementing the ESPR, it is imperative that the PEFCR for Apparel and Footwear be scrutinized for their efficacy and alignment with the EU's sustainability goals. The current PEFCR framework, while ambitious, presents several critical shortcomings that could undermine the EU's objectives of promoting sustainable consumption and production patterns, particularly in the textile sector. 1. The inclusion of new Life Cycle Assessment (LCA) datasets in the Product Environmental Footprint (PEF) methodology is a commendable effort towards enhancing the comprehensiveness of environmental impact assessments. However, the persisting concerns regarding the quality of this new data cannot be overlooked. Reliable and high-quality data is the cornerstone of effective environmental policymaking, and any ambiguity in this data undermines the integrity of the PEF scores, potentially misleading stakeholders about the true environmental footprint of apparel and footwear products.	Acknowledged

	<p>whenever it is appropriate within the frameworks of the ESPR and the EU Ecolabel."</p>	<p>2. Moreover, the decision to relegate the accounting for microfibres to the side notes of the PEF, as opposed to the original proposal to account for microplastics, significantly dilutes the effectiveness of the PEF in addressing one of the most pressing environmental concerns associated with the textile industry. This approach not only fails to impact the final PEF score but also obscures vital information from consumers, thereby hindering informed decision-making and perpetuating the microplastic pollution problem.</p> <p>3. The Technical Secretariat's (TS) acknowledgment of the need for further research on non-physical durability is a step in the right direction and the JRC has come to the same conclusion within the preparatory study. However, without immediate and tangible action to integrate non-physical durability into the PEF scores, the method falls short of capturing the full lifecycle impacts of products. Similarly, while minor adjustments have been made to the physical test thresholds to mitigate the overemphasis on physical durability, a discernible bias towards polyester remains. This bias not only skews the PEF scores in favor of synthetic fibres but also inadvertently disadvantages natural fibres, which are often more sustainable in the long term.</p> <p>4. The failure to address the system boundary issue makes the PEFCR particularly flawed. The PEFCR methodology compares farmed products with mined products.</p> <p>Because it's based on LCA principles, PEF does not account for the formation of the oil and natural gas from which fossil fuel fibres are made, whereas all the impacts of forming natural fibres are accounted for in PEF – resulting in an inequitable comparison. See previous comment.</p> <p>5. The exclusion of inherent circularity (such as biodegradability) from the PEF's score further exacerbate the method's shortcomings. These omissions signal a missed opportunity to fully embrace the principles of circular economy and to recognize the significant environmental benefits of natural fibres, which are biodegradable and contribute to reducing the textile industry's overall environmental impact.</p> <p>In light of these concerns, it is clear that the current PEFCR does not adequately support the EU's ambition to phase out 'Fast Fashion' nor does it align with the broader textile strategy goals of enhancing circularity and mitigating microplastic pollution. The continuation of a bias towards polyester and the lack of transparency in</p>	
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338	3.3.2; 670-676	<ul style="list-style-type: none"> - Climate impact is also created during use phase of a product. Not an insignificant share. - The terms Textile fragmentation and microplastics seem to be used interchangeably, which is incorrect. The difference should be highlighted. 	<p>Acknowledged</p> <p>The consequence of the fragmentation of textiles is the formation of microfibers (in case of synthetic fabrics microplastics). Task 5 will report a detailed</p>

		<p>- In the paragraph, there is again a mix up of what is an impact. This needs to be carefully worded, as so much more research is needed into the health and environmental impacts of microfibers (not just microplastics). It should be highlighted that there is a difference between textile fragmentation and environmental and health impacts.</p> <p>- Sources of microfiber is more complicated than this. It is the main source in wastewater. This should be described more specifically and scientifically.</p> <p>-Worth mentioning that textile fragmentation occurs while actual use. And that the main drivers are not yet established.</p>	assessment on microplastics.
339	3.3.2 Main negative environmental impacts; 670-700	<p>As per the JRC analysis, one of the leading sources of microplastics pollution is considered the fragmentation of synthetic textiles. the JRC further remarks, that the current patterns indicate that emissions of microplastics from textiles are projected to rise by approximately 22% by the year 2030 (DG ENV, 2023).</p> <p>It should be noted, that as service providers, textile care services are a link in the full textile supply chain. A lot of the particles released during the industrial washing are not necessarily considered plastics. The non-fibres consist of many different materials, while the fibres shaped particles consist mainly of polyester. The fibre-shaped particles, therefore, present an estimate of the number of microplastic particles with a best-case scenario where only 1% of the non-fibre particles are plastic and a worst-case where 5% is plastic. Overall, the textile care industry is responsible for a fraction of microplastic emissions (see ETSA position paper link sent to the email address).</p> <p>[https://www.textile-services.eu/_common/doc_download.cfm?id=107594C19545EAD40093B306C9FD34A0&folder_id=399]</p>	Acknowledged
340	3; 670	<p>Suggestion: in a delegated act for textiles "expected microplastics release" should be added as an extra ecodesign aspect like the aspects under (article 5(1) of ESPR. Also in table 8 (line 710) microplastics could be added.</p>	<p>Rejected</p> <p>Ecodesign requirements will be proposed in the following stages of the PS.</p> <p>Task 5 will report a detailed assessment about microplastics release.</p>

341	3.3.2; 670	Microplastics and pollution originated from textile fragmentation should be addressed with a precautionary approach. There is an increasing amount of scientific evidence on the associated adverse health impacts: https://www.nejm.org/doi/full/10.1056/NEJMoa2309822	Acknowledged
342	3.3.2.; 670	An interesting report on microplastics from textiles is available here (ETC/CE - 2022): https://www.eionet.europa.eu/etcs/etc-ce/products/etc-ce-products/etc-ce-report-1-2022-microplastic-pollution-from-textile-consumption-in-europe . It compares several estimates of microplastics discharge to water from different literature sources, including Boucher and Friot, 2017, as well as others. A highly underresearched issue is microplastics release to air, during wear and tear.	Acknowledged
343	3.3.2 Pollution originated from textile fragmentation; 671	The document looks at unintended releases of microplastics from textiles (fragmentation). It does not look at intentional additions of microplastic glitter to textiles leading to unintended releases. Given the environmental impacts, the latter scenario has to be added to the preparatory story. Note that this scenario is likely not covered by the REACH restriction of microplastics intentionally added to products (Commission Regulation (EU) 2023/2055)	Acknowledged Task 5 will report a detailed assessment about microplastics release.
344	3.3.2; 672	[...] welcomes the mention by the JRC of the release of microplastics. The prevention or mitigation of such release will be an essential ecodesign requirement for synthetic textile apparel.	Acknowledged
345	3.3.2. Main negative environmental impacts - Pollution originated from textile fragmentation; 673 - 674	The reference to the study conducted in 2017, when more updated research on the textile fragmentation, including the DG ENVI study from 2023, is available should be revised accordingly to latest available information, and provide clarification that leading sources of microplastics pollution include tyres and paints, followed by textiles. Moreover, [...] wishes to address the need for more holistic terminology, that covers microfibres instead of microplastics, as natural fibres also have an impact on the environment as identified by the JRC.	Acknowledged Task 5 will report a detailed assessment about microplastics release.
346	3; 676	It is also important to consider the downstream impacts beyond just water pollution. Microfibers that are captured by waste treatment plants may ultimately end up in soils when the treated wastewater is used for agricultural purposes, potentially contributing to soil contamination. Use phase of textiles is also an important source of microfibers and microplastics into the atmosphere, from wearing and drying processes.	Acknowledged
347	3; 680	It's crucial to highlight the significant lack of data in this area, especially when it comes to the disposal stage of the microplastics life cycle. Without comprehensive information on production, use, and disposal phases, it becomes incredibly challenging to fully understand and address the environmental impact of microplastics.	Acknowledged
348	3; 682	Completely aligned. It is crucial to have reliable methods for quantification, not only to understand the issue and scope, but also to address and assess the efficacy of potential solutions to reduce shedding.	Acknowledged

349	3.3.2; 686	"Physical and chemical impacts" - what does this mean? Better to be clear what is really meant here, as the question begs if chemical impacts mean anything. If it is meant to say, "impacts from chemicals", what impacts?	Accepted. The text was changed.
350	3; 686	<p>While the text acknowledges the impact of microplastics on organisms and their persistence in the environment, it lacks precision and depth, please consider the numerous studies that have demonstrated the negative effects of microfibers on animals and ecosystems.</p> <p>Here are four interesting studies on the subject:</p> <ul style="list-style-type: none"> • Almroth et al. (2023). Assessing the effects of textile leachates in fish using multiple testing methods: From gene expression to behavior • Kim et al. (2021). Synthetic and natural microfibers induce gut damage in the brine shrimp <i>Artemia franciscana</i> • Siddiqui et al. (2023). Natural and synthetic microfibers alter growth and behavior in early life stages of estuarine organisms. • Walkinshaw et al. (2023). Impact of polyester and cotton microfibers on growth and sublethal biomarkers in juvenile mussels. 	Acknowledged Task 5 will report a detailed assessment about microplastics release.
351	Section 3.3.2 Main negative environmental impacts – Pollution originated from textile fragmentation; 691: Citation from the Preliminary Report Despite the biodegradability of natural fragmented	<p>The need to keep an open mind on the impacts of microplastics v's microfibrils (from natural fibres) until the science is sufficiently robust, is acknowledged. However, sufficient science is already in place to not equate them.</p> <p>Biodegradable and non-biodegradable fibres are by definition not the same - so should not be bundled together into a similar class. One bio-accumulates indefinitely while the other breaks down through the actions of living organisms and gradually no longer exists. The fact that microplastics break down through UV and physical actions and may seem to disappear, is no reason to ignore them – the evidence of their increasing harm to human and animal health as they transition to nanoplastics is rapidly growing.</p> <p>* "The European Chemical Agency acknowledges that nanoplastic is a "hazard", "poorly understood" and could "lead to greater potential for adverse effects and bio-accumulation". Its experts were clearer still, warning of the higher toxicity of nanoplastic and that excluding smaller plastic particles from the EU ban will lead to "regrettable</p>	Acknowledged Task 5 will report a detailed assessment about microplastics release.

<p>fibres, their potential risk is still under evaluation, because their release could be associated with harmful substances (UNEP, 2020). The release of natural fragmented fibres is an emerging environmental concern that parallels the issues posed by synthetic fragmented fibres (microplastics). While the natural fragmented fibres are biodegradable, their widespread release into aquatic systems can still lead to ecological disruptions (Henry et al., 2019). The</p>	<p>substitution”, a market shift towards something we will later regret.</p> <p>Nanoplastic may be more harmful to human and animal health because it can more easily get inside and harm living cells. Despite all this, the agency secretariat has accepted industry’s request to exclude nanoplastic from the ban, twisting the very definition of microplastic to suit industry and giving manufacturers a perverse incentive to shift from micro to more risky nanoplastic.”</p> <p>With microplastic release from all life stages other than laundering currently omitted from PEF (due to the science being incomplete), will an interim allowance be made to account for these other (and potentially larger) release pathways?</p> <p>* Resource</p> <p>European Environmental Bureau - EU microplastics ban set to make a growing problem worse</p> <p>https://eeb.org/eu-microplastics-ban-set-to-make-a-growing-problem-worse/</p>	
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	<p>concern is that, similar to synthetic fragmented fibres, they can transport hazardous substances, introduce invasive species via attachment, and affect the feeding behaviour within food webs. Additionally, understanding the full environmental impact of natural fragmented fibres, including their degradation rates and interactions with aquatic life, remains a critical area to be explored.</p>		
352	3.3.2; 691	As mentioned, natural fibres still shed, and could be linked to dyes, chemicals and treatments. However, synthetic fibres also biodegrade, and are not permanent in nature. Would be good to mention that this is more nuanced.	Acknowledged Task 5 will report a detailed assessment about microplastics release.

353	3.3; 691-699	<p>The preliminary study states that the release of natural fragmented fibres parallels the issues posed by synthetic fragmented fibres (microplastics), as they can transport hazardous substance, and that further research is needed to understand their impacts.</p> <p>[...] would like to suggest that the preliminary study integrates further considerations on the future scenario set by the EU Textile Strategy for Sustainable and Circular Textiles where textiles will be free from hazardous chemicals. In such scenario the impacts of natural fragmented fibres are not comparable to the impacts of synthetic fragmented fibres which are not biodegradable.</p>	<p>Acknowledged Task 5 will report a detailed assessment about microplastics release.</p>
354	Section 3.3.2; 691-699	<p>It is crucial to evaluate the ecotoxicity of microparticles that are shed from textiles, especially in the case of textiles made of natural fibres. It is important to evaluate if the risks to the biota and environment come from harmful substances used during textile production or applied to the product. In that case, the most appropriate solution is to restrict the use of those substances.</p>	<p>Acknowledged Task 5 will report a detailed assessment about microplastics release.</p>
355	Section 3.3.2; 691-699	<p>It is crucial to evaluate the ecotoxicity of microparticles that are shed from textiles, especially in the case of textiles made of natural fibres. It is important to evaluate if the risks to the biota and environment come from harmful substances used during textile production or applied to the product. In that case, the most appropriate solution is to restrict the use of those substances.</p>	<p>Acknowledged Task 5 will report a detailed assessment about microplastics release.</p>
356	3; 691	<p>Natural fibres can contain synthetic colours/paint that are potentially as harmful as other microplastics.</p>	<p>Acknowledged</p>
357	3.3.2; 691	<p>The text should be more clear that synthetic fibres currently create the main problem due to the volume and persistence in the natural environment?</p>	<p>Acknowledged Task 5 will report a detailed assessment about microplastics release.</p>
358	3.3.2; 695	<p>Henry et al. is cited as evidence that the widespread release of natural fibres can still lead to ecological disruptions. The focus of the paper is on micro-plastics, and it does not cite any papers to support the claim made in the PS. The only relevant reference is highly qualified through the use of words such as "speculate", "</p> <p>"more research ... to evaluate this potential risk", i.e. "However, Zhao et al. (2016) speculate that relatively rapid biodegradation of natural fibres may increase the bioavailability of chemical additives, e.g. dyes, if these microfibrils are metabolized quickly once ingested. They urge more research in order to evaluate this potential risk of adverse effects.</p>	<p>Accepted. The text was changed.</p>

		<p>By way of contrast, the paper also notes very clearly there is limited evidence: "Few studies have described the prevalence and impacts of non-plastic fibres, and of these most have detected man-made cellulose in microlitter (Halstead et al., 2018; Setälä et al., 2016; Remy et al., 2015; Dris et al., 2017). However, more comprehensive measurements are needed to confirm whether the apparent absence of natural fibres relates to use of analytical techniques targeting plastic polymers or to natural microfibrils not being present in samples."</p> <p>In summary, there are only limited data on the presence and persistence of natural and man-made cellulose fibres and blends across a range of environmental systems, let alone evidence of impact.</p>	
359	3; 697	<p>The statement brings up a crucial point about the complexity of assessing the environmental impact of natural fragmented fibers. Although they are perceived as biodegradable, the few studies available indicate that this assumption does not hold true in all cases. Various factors, including the presence of dyes, additives and the mixing of natural and synthetic fibers, can hinder biodegradation and exacerbate environmental pollution. In addition, it is difficult to obtain garments made solely from natural fibers, as synthetic yarns are commonly incorporated. Consequently, once natural fibers are combined with synthetic fibers, the biodegradability of the garment is compromised.</p> <p>Here is an interesting study on that subject: Royer et al. (2023) Not so biodegradable: Polylactic acid and cellulose/plastic blend textiles lack fast biodegradation in marine waters. and cotton microfibers on growth and sublethal biomarkers in juvenile mussels.</p>	<p>Acknowledged Task 5 will report a detailed assessment about microplastics release.</p>
360	3; 709	<p>line 709 is already a white line where 3.3.3 Main Social aspects fits well in this document</p>	<p>Rejected Social aspects do not belong to the scope of ESPR. They will be addressed in the revision of the EU Ecolabel criteria.</p>
361	3.3.2; 710	<p>Please elaborate what "ecosystem quality" and "human health" are referring to. End-point impacts?</p> <p>For use phase, is water consumption not a consideration under "ecosystem quality"? It would be good to ensure that all the largest material environmental considerations are taken into account, as this table seems more cherry picked. It should be exhaustive if a table like this is to be presented at all</p>	<p>Rejected These are generic areas of impacts. Task 5 will report a detailed environmental assessment.</p>

362	3.3.2.; Table 8	Microplastic pollution should be added to Table 8, in both ecosystem quality and human health columns in all the different stages of the life of the product, as recognized in lines 671 and 672.	Rejected Task 5 will report a detailed assessment on microplastics release.
363	3.3.2; 710 (Table 8)	Fibre production is the first line, and indicates raw material production accounts for 12 % of the climate change impact, and that the impacts include habitats loss, water use, soil degradation and agrochemicals, i.e. all issues closely associated with agriculture. However, natural fibres from agriculture probably make up less than 30% of global fibre production, and likely a similar proportion is going into apparel. To ensure a comprehensive coverage, impacts associated with polyester production, and other synthetic fibres also need to be more explicitly referenced. Better breakdown by fibre type would also allow for a better resolution for other impacts eg. climate change.	Rejected Task 5 will report a detailed environmental assessment.
364	Section 3.3.2; Table 8	Microplastic pollution should be added to Table 8, in both ecosystem quality and human health columns in all the different stages of the life of the product, as recognized in lines 671 and 672.	Rejected Task 5 will report a detailed assessment on microplastics release.
365	Section 3.3.2; Table 8	Microplastic pollution should be added to Table 8, in both ecosystem quality and human health columns in all the different stages of the life of the product, as recognized in lines 671 and 672.	Rejected Task 5 will report a detailed assessment on microplastics release.
366	3.1.3; 710	This table needs much more details, especially about from where the percentages are from and what does N/A mean here. Also it needs to be highlighted, that if percentages of life cycle is considered, it depends A LOT about what the modeling assumptions, especially for the use phase are. The more a garment is used, the higher the portion of the use phase impacts are, but this is not bad at all, because the "per use" impacts will be reduced by each washing. This also means that the weight of the production phase is diminished.	Clarified NA means Not Available. The clarification was added to the text. The references of the percentages are reported in the bottom of the Table 8. Task 5 will report a detailed environmental assessment.
367	3; 710	Could you please define "Hazardous chemicals"? In Table 9 (lines 1007-1010) definitions are provided for toxic and harmful chemicals but hazardous chemicals are mentioned in table 8 and also on line 2269 but not definition is provided. A definition is needed to know what it is being included.	Rejected The hazard classes are defined by the CLP Regulation. Task 5 will report a detailed analysis on chemicals used in the

			products belonging to the scope of the PS.
368	Table 8; N/A	Does it also contain pulp production in fibre production? Add?	Clarifications needed from the stakeholder The authors do not understand the comment. The stakeholder is invited to provide more details in the next consultation.
369	3.3.2; 710	Following the remarks made to section 3.1.1, line 414, it should be noted that table 8 does not discriminate between the environmental impacts of the apparel value chain on a sufficiently high level of detail to use as the basis for selecting ecodesign requirements. This needs to be further elaborated for the 2nd milestone.	Rejected The aim of this section is reported at the beginning of the section. Task 5 will report a detailed environmental assessment.

7 Comments on section 4 – Legislation, strategies and voluntary environmental labels relevant for the textile sector

Table 8. Comments on section 4 – Legislation, strategies and voluntary environmental labels relevant for the textile sector

ID	Stated section; stated line	Comment	Answer
370	Section 4: Legislation, strategies and voluntary environmental labels relevant for the textile sector; 414-734: general comment	<p>As the PS mentions, ESPR needs to align itself with other legislations, strategies and voluntary environmental labels. In addition to what the PS is mentioning, we believe it is also important for ESPR to consider international agreements and goals the EU has committed itself to. These would include the United Nations Social Development Goals, the COP27 Paris Climate Agreement, Kunming-Montreal Global Biodiversity Framework and the WTO trade rules as pointed out by Bates Kassatly and Townsend.</p> <p>Resource:</p> <p>Veronica Bates Kassatly, Terry Townsend: European Union Ecodesign for Sustainable Products Regulation: Summary of inconsistencies and potential deficiencies in the Preliminary Study on New Product Priorities – with specific reference to Textiles and Footwear:</p> <p>https://www.crdc.com.au/sites/default/files/pdf/CRD23007%20European%20Union%20Regulation%20Mk14.pdf</p>	Acknowledged
371	Section 4. legislation; 714-911	<p>It is fundamental to ensure policy coherence between the various pieces of EU legislation (existing or under development) as well as harmonized requirements to avoid national legislation with little impacts for the environment (lines 885 to 911). The future delegated act for textiles should be consistent with other pieces of legislation, especially in scope, definitions and environmental requirements. This would avoid the creation of legislative loopholes or overlaps and would ensure legal certainty and a level playing field for companies.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>In particular, the ESPR delegated act for textiles must be aligned with the Textile Labelling Regulation (TLR) and the Waste Framework Directive (WFD), both under revision.</p> <p>Alignment of ESPR and TLR: as the ESPR DA for textiles will define sustainability requirements for textiles, eco-design requirements (incl. consideration of environmentally preferred materials) as well as the product information to be digitalised under the Digital Product Passport, it is essential to maintain alignment with existing regulations and ensure that no additional circularity and sustainability information is mandated in the revised TLR beyond what has been agreed upon in the ESPR Delegated Act. Note that the TLR has a broader scope than the ESPR as it applies to textile products and products with textile components made up of at least 80% by weight of textile fibres. This should be taken into consideration in a potential future extension for ecodesign requirements to more textile products.</p> <p>Alignment of ESPR and WFD: In the WFD, the scope is defined in Annex IVc and is aligned with CN codes. In particular, sportswear, leisure, and fashion products fall within the scope of the definition of textile articles of apparel and clothing accessories and thereby are covered by the extended producer responsibility and the eco-modulation of fees. As eco-modulation will be further defined based on ESPR eco-design requirements, it is important to ensure full alignment of scope between the two texts. Therefore, we recommend the EU Commission to ensure that the preparatory work on home textiles and footwear is also advancing to ensure timelines are synchronized with the expected development of eco-modulation under EPR. Eco-modulation fee is a key instrument to stimulate the uptake of recycled content into garments and further develop the textile recycling value chain. Last but not least, the Delegated Act for textiles will potentially include sorting instructions and this should be defined in connection with the Waste Framework Directive.</p> <p>Alignment with REACH on Substances of Concern: For the sake of feasibility and legal certainty, it is pivotal that future information and tracking requirements on Substances of Concern under the ESPR are aligned with current and upcoming requirements under REACH, i.e., disclosure requirements of SVHC (Substances of Very High Concern) and restrictions under REACH Annex.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Alignment EU End-of- Waste Criteria: The EU Commission must ensure that the work done on eco-design measures under the ESPR is aligned and consistent with legislation elsewhere. This alignment is particularly crucial for EoW criteria, especially concerning will be critical especially linked to recycled content requirements under the ESPR. It is imperative that the timeline for implementing EoW is synchronised with the ESPR Delegated Act to ensure the availability of recycled content.</p>	
372	4; 714	<p>Missing legislation chapter 4:</p> <p>The Industrial Emissions Directive (IED) is the main EU instrument regulating pollutant emissions from industrial installations. Around 52,000 installations undertaking the industrial activities listed in Annex I of the Directive are required to operate in accordance with a permit (granted by the authorities in the Member States). This permit should contain conditions set in accordance with the principles and provisions of the Directive. Annex I contains at least two installations significant to textiles: 6.2. Pre-treatment (operations such as washing, bleaching, mercerisation) or dyeing of textile fibres or textiles where the treatment capacity exceeds 10 tonnes per day + 6.3. Tanning of hides and skins where the treatment capacity exceeds 12 tonnes of finished products per day. In 2022, the Commission adopted proposals to revise the IED. Amongst other things about the use and content of BATs. We advise to check out the Directive and the status of the revision to see how they impact the textile industry. See: https://environment.ec.europa.eu/topics/industrial-emissions-and-safety/industrial-emissions-directive_en</p>	<p>Accepted The text was implemented.</p>
373	4; 716-718	<p>In order to be able to create synergies with legislation schemes outside the EU, production countries should be involved in the process at a very early stage, to also allow them to prepare for the upcoming regulations and requirements and to incorporate their perspective and expertise in the development of upcoming policies. Since the textile value chain is a global one and countries outside the EU will need to comply with and implement legislation, policies must be inclusive to ensure their acceptance on a global level.</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
374	4; 716-928	<p>It is fundamental to ensure legislative coherence between the different pieces of legislation to avoid the duplication of obligations and the unnecessary increase of bureaucracy.</p> <p>On this note, and in reference to the revision of the TLR, sustainability information should remain in the context of the ESPR legal framework, in the form of information requirements to be shared through the Digital Product Passport or specific labels to be set following the standards introduced in the ESPR legal framework.</p> <p>When it comes to coordination and coherence with the REACH Regulation, the sharing of information on the presence of chemicals as an information should be fully aligned with the REACH Regulation, acknowledging the focus of the REACH Regulation to ensure chemical safety and the approach of the ESPR legal framework to foster recycling. On this note, it is important to highlight the need not to duplicate obligations, build and align on the definitions already included in REACH, or bypass the REACH Regulation. Information requirements should address hampering recycling and health and environmental safety.</p> <p>Alignment in terms of timelines and implementation when it comes to the anticipated end-of-waste criteria for the recycling of textiles will also be critical. Further, alignment of scope with the revised WFD will also be critical. In the WFD, the scope is referred to as apparel, footwear and home textiles, and they hence fall within the scope of the definition of textile articles or apparel and clothing accessories and thereby are covered by the extended producer responsibility and the eco-modulation of fees. As eco-modulation will be further defined based on ESPR eco-design requirements, it is important to ensure full alignment of scope between the two texts. Therefore, we recommend the EU Commission ensure that the preparatory work on home textiles and</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		footwear is also advancing in parallel with the work on apparel textiles to ensure timelines are synchronized with the expected development of eco-modulation under EPR.	
375	4; 733-734	It is not only about the availability of information, but also about the robustness and validation of information for the DPP.	Acknowledged
376	4.1 Existing EU legislation & 4.2 Legislation and initiatives in EU Member States and non-EU countries; 735 ff. & 885 ff.	<p>From the perspective of MEErP, this section should actually serve to define the scope. The way this preparatory study is structured, one expects an analysis of how ecodesign / product aspects are covered by other legislations. Therefore, we suggest to highlight the references to ecodesign aspects in each legislation.</p> <p>@ line 735 ff.: In this paragraph we also miss essential regulations such as the Industrial Emission Directive 2010/75/EU or the BAT conclusions for Textile Industry (Commission Implementing Decision (EU) 2022/2508) and regulation in preparation as the Corporate Sustainability Due Diligence Directive CSDDD (2019/1937/EU).</p> <p>@ line 885 ff.: In this paragraph the analysis of national Supply Chain Acts, e.g. from France, is missing with regards to how they contribute to e.g. resource use and resource efficiency.</p> <p>Our conclusion so far is that potential requirements for ecodesign/product aspects such as an environmental impact, including carbon and ecological footprint, will need to take advantage of synergies with existing reporting and improvement systems which are so far realized under national supply chain acts.</p>	<p>Partly accepted</p> <p>The PS follows the rules set in the ESPR to select the scope.</p> <p>Sections about the IED and CSDDD were added.</p> <p>The authors would be grateful if in the next consultation, the stakeholder provided the complete reference to the French law reported in the comment.</p>
377	4; Lines 745 to 757 Lines 809 to 821	- It is fundamental to ensure policy coherence between the various pieces of EU legislation (existing or under development) as well as harmonized requirements. The future delegated act for textiles should be consistent with other pieces of legislation, especially in scope, definitions and environmental requirements. This would avoid the creation of legislative loopholes or overlaps and would ensure legal certainty and a level playing field for companies.	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>- In particular, the ESPR delegated act for textiles must be aligned with the Textile Labelling Regulation (TLR) and the Waste Framework Directive (WFD), both under revision.</p> <p>o Alignment of Delegated act for textiles products under ESPR and TLR: as the ESPR DA for textiles will define sustainability requirements for textiles, eco-design requirements (incl. consideration of environmentally preferred materials) as well as the product information to be digitalized under the Digital Product Passport, it is essential to maintain alignment with existing regulations and ensure that no additional circularity and sustainability information is mandated in the revised TLR beyond what has been agreed upon in the ESPR Delegated Act. In substance, the revised TLR should not cover information that will be regulated under the ESPR to avoid duplication. Note that the TLR has a broader scope than the ESPR as it applies to textile products and products with textile components made up of at least 80% by weight of textile fibres. This should be taken into consideration in a potential future extension for ecodesign requirements to more textile products.</p> <p>o Alignment of ESPR and WFD: As eco-modulation will be further defined based on ESPR eco-design requirements, it is important to ensure full alignment between the two texts. Therefore, we recommend the EU Commission to ensure that the preparatory work on home textiles and footwear is also advancing to ensure timelines are synchronized with the expected development of eco-modulation under EPR. Eco-modulation fee is a key instrument to stimulate the uptake of recycled content into garments and further develop the textile recycling value chain. Last but not least, the Delegated Act for textiles will potentially include sorting instructions and this should be defined in connection with the Waste Framework Directive.</p> <p>o Alignment with REACH on Substances of Concern: For the sake of feasibility and legal certainty, it is pivotal that future information and tracking requirements on Substances of Concern under the ESPR are aligned with current and upcoming requirements under REACH, i.e., disclosure requirements of SVHC (Substances of Very High Concern) and restrictions under REACH Annex.</p> <p>o Alignment EU End-of-Waste Criteria: It is important the work done on eco-design measures under the ESPR is aligned and consistent with EoW criteria, especially</p>	

ID	Stated section; stated line	Comment	Answer
		concerning recycled content requirements under the ESPR. The timeline for implementing EoW must be synchronised with the ESPR Delegated Act to ensure the availability of recycled content.	
378	4.1.1; 745	It is fundamental to ensure legislative coherence between the different pieces of legislation to avoid de duplication of obligations and the unnecessary increase of bureaucracy. Sustainability information should remain in the context of the ESPR legal framework, in the form of information requirements to be shared through the Digital Product Passport.	Acknowledged
379	4.1.1; 745	The Biocidal Products Regulation where biocides in textile are regulated is not listed. (Regulation (EU) No 528/2012 of the European Parliament and of the Council concerning the making available on the market and use of biocidal products)	Rejected The section provides the legislative framework that is directly connected to the product aspects and potential future requirements. The authors think that reporting the complete list of laws would make the reading of the report less fluid. If the next steps of the PS will show a connection with the Biocidal Products Regulation, we will include it in this section.
380	4.1.1 Existing EU legislation; 746	Consistency and harmonisation with the Textile Labelling Regulation (TLR) obligations will be critical for legal certainty. Obligations cannot be duplicated between the TLR and the ESPR/DPP. For instance, the sustainability information (i.e. circularity/sustainability label for consumers) should be mandated under the ESPR and provided to consumers via the DPP. We also strongly support the alignment of digital labels under the TLR with the DPP. We are convinced that there should be one data carrier (e.g., a QR code) for both sources of information.	Acknowledged
381	4.1.1; 746	The TLR should include declaration of usage of pre-/post-consumer materials The TLR should include declaration of usage of recycled content – also considering the origin of the materials	Acknowledged
382	4.1.1; 746-757	[...] has argued for the need for TLR to includes "organic" as a controlled and regulated term to avoid the manifest greenwash. [...] has submitted response to the consultation questionnaire and also has provided the following by way of additional documentation:	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>Additional information to the [...] response to the EU Commission consultation on the Textile Names and Labelling Regulation 2011/1007</p> <p>[...]'s responses to the consultation questionnaire, specifically in relation to Questions 23-29 and the additional information provided in the text boxes, considers that it is of high importance that the term 'organic' is included into EU Regulation 1007/2011.</p> <p>The term "organic" enjoys high reputation by consumers who expect in the context of textiles – as is the case with food – sustainable agricultural production as well as ecological processing, both with proper independent controls.</p> <p>Private organic standards (for "organic textiles" as well as "organic content") which meet these expectations are established on the EU market. In order to prevent greenwashing by false "organic" claims, some kind of regulation is required. As this regulation defines terms to be used in connection with textiles, this should be provided through EU Regulation 2011/1007.</p> <p>The EU Organic Regulation (EU Regulation 2018/848) regulates only, arbitrarily, some fibres which, certified against it, have no relevance for the EU market. Other (intended) EU laws are not intended and suitable to generally regulate the term "organic" in relation to textiles. Thus, we are convinced that the Textile Regulation is the proper instrument for such regulation.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>[...] supports the proposal made by [...] for amendment to the Textile Regulation (EU Regulation 2011/1007) along the following lines:</p> <p>The term “organic” and equivalent terms may only be used:</p> <ul style="list-style-type: none"> • for textiles containing organic fibres: In relation to the fibre content only, the term organic may be used for fibres that have been produced according to the requirements laid down in Regulation (EU) 2018/848, the US National Organic Programme (NOP) or equivalent legal obligations set by trade partners of the EU. <p>and</p> <ul style="list-style-type: none"> • if the product is independently controlled and certified in accordance with a labelling scheme which meets the requirements of the Green Claims Directive, and where the scope of this scheme requires organic fibres certified against an organic production standard and requires the verification and quantification of the fibre content • for organic textiles: In relation to textile/apparel products, if the products are independently certified in accordance with a labelling scheme which meets the requirements of the Green Claims Directive and requires a minimum of 70 % of fibres independently certified against an organic production standard, ecological processing, and ILO core norms. 	
383	4.1.1; 746	<p>o We strongly support EU level harmonised legislation as this is critical for levelling the playing field and limiting barriers in the EU Single Market, but consistency with other legislation is also vital.</p> <p>o Consistency and harmonisation with the Textile Labelling Regulation (TLR) obligations will be critical for legal certainty. Obligations cannot be duplicated between the TLR and the ESPR/DPP. For instance, the sustainability information (i.e. circularity/sustainability</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		label for consumers) should be mandated under the ESPR and provided to consumers via the DPP. We also strongly support the alignment of digital labels under the TLR with the DPP. We are convinced that there should be one data carrier (e.g., a QR code) for both sources of information.	
384	4.1.1 Existing EU legislation - Textile Labelling Regulation; 746	<p>[...] thinks that the term “organic” for fibre content should be protected, e.g. in the context of the textile labelling regulation. But this makes sense only if the implementation will be controlled, meaning that the term “organic” can only be used if this is verified by a certification system that controls that the term is not misused.</p> <p>[...] thus suggests that the term “organic” and equivalent terms may only be used:</p> <ul style="list-style-type: none"> - for textiles containing organic fibres: In relation to the fibre content only, the term organic may be used for fibres that have been produced according to the requirements laid down in Regulation (EU) 2018/848, the US National Organic Programme (NOP) or equivalent legal obligations set by trade partners of the EU <p>and</p> <p>if the product is independently controlled and certified in accordance with a labelling scheme which meets the requirements of the Green Claims Directive, and where the scope of this scheme requires organic fibres certified against an organic production standard and requires the verification and quantification of the fibre content</p> <ul style="list-style-type: none"> - for organic textiles: In relation to a textile/apparel if the product is independently certified in accordance with a labelling scheme which meets the requirements of the Green Claims Directive and requires a minimum of 70 % of fibres independently certified against an organic production standard, ecological processing, and ILO core norms. 	Acknowledged

ID	Stated section; stated line	Comment	Answer
385	4.1.1; 753	<p>Our Federation has contributed to the first two public consultations on the revision of the EU textile labelling regulation. In particular, we share the concerns raised in the call for evidence regarding current and future lack of harmonised rules in the European single market on labelling of textiles, leading to difficulties of implementation by stakeholders, increased compliance costs for companies, and potential lack of relevant information provided to consumers.</p> <p>The crucial need for harmonisation between EU regulations and with pre-existing national regulations such as loi AGECE must be at the centre of discussions regarding both ESPR Delegated Acts and EU textile labelling regulation revision.</p>	Acknowledged
386	4; 753-757	<p>Textile Labelling Regulation (TLR).</p> <p>It is fundamental to ensure legislative coherence between the different pieces of legislation to avoid de duplication of obligations and the unnecessary increase of bureaucracy. Sustainability information should remain in the context of the ESPR legal framework, in the form of information requirements to be shared through the Digital Product Passport.</p>	Acknowledged
387	4.1.1; 756	<p>We ask to take particular attention to the coherence of the Textile Labelling Regulation (TRL) with the ESPR and the future development of the Delegated Act for Textiles. Sustainability and environmental information on textile products will be provided to consumers as required under the ESPR, and the criteria will be developed under the ESPR Delegated Act. The TLR should remain a technical regulation on fibre information, not duplicating obligations to provide sustainability of information. We also strongly support the alignment of digital labels under the TLR with the DPP. We are convinced that there should be one data carrier (e.g., a QR code) for both sources of information</p>	Acknowledged
388	4.1.1.; 756	<p>Line 756, Allergenic substances are not easy to define. There are large variety of definitions so it must be cleared.</p>	Acknowledged
389	4.1 EU legislation; 759 - 779	<p>It is fundamental to ensure legislative coherence between the different pieces of legislation to avoid duplication of obligations and the unnecessary increase of red tape.</p> <p>On this note, and in reference to the revision of the TLR, sustainability information should remain in the context of the ESPR legal framework, in the form of information requirements to be shared through the Digital Product Passport or specific labels to be</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>set following the standards introduced in the ESPR legal framework.</p> <p>When it comes to coordination and coherence with the REACH Regulation, the sharing of information on the presence of chemicals should be fully aligned with the REACH Regulation, acknowledging the focus of the REACH Regulation to ensure chemical safety and the focus of the ESPR legal framework to foster circularity. To enable this, it needs to focus on the legislated SVHC substances and utilization of the EU SCIP database, the extension to undefined groups of substances as e.g. Substances of Concerns will create legal uncertainty for economic operators (including product recycling) and undue, disproportional, and unrealistic burden.</p>	
390	4.1.1; 759	<p>o Alignment with REACH: For the sake of feasibility and legal certainty, it is pivotal that future information and tracking requirements on Substances of Concern under the ESPR are aligned with current and upcoming requirements under REACH, i.e., disclosure requirements of SVHC (Substances of Very High Concern) and restrictions under REACH Annex XVII. To exemplify, we would strongly recommend that any thresholds under the ESPR are not set any lower than the 0.1 % (weight by weight).</p> <p>o Defining a list of the relevant substances of concern, including CAS/EC no., for products in scope, will be critical.</p>	Acknowledged
391	4; 759-779	Entry 72 of Annex XVII is not included. It is relevant as include several chemicals such as heavy metals, formaldehyde, polycyclic aromatic hydrocarbons, phthalates, dyestuff and quinoline, among others.	Rejected. Entry 72 on “CMRs in textiles” was already mentioned. See line 774 of the report.
392	4.1.1; 759	[...] would like to stress that design requirements pertaining to chemicals should not be introduced in the Delegated Act for Textiles but remain in REACH to avoid legislation overlap. If new restrictions, thresholds or requirements on chemicals use in textile apparel to foster their sustainability are to be introduced, this should be done by revising the REACH regulation.	Acknowledged
393	4.1.1; 759-780	There is also a proposed restriction on skin sensitisers in textiles and a proposed restriction on PFAS that also includes textiles in its scope. See https://echa.europa.eu/registry-of-restriction-intentions/	Acknowledged

ID	Stated section; stated line	Comment	Answer
		/dislist/details/Ob0236e182446136, and https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/Ob0236e18663449b	
394	4; 759	The REACH regulation applies to toy disguise costumes for both SVHC and the restrictions in Annex XVII. The main entries applying to this product (which may contain plastic components) are: Entry 5 (benzene), Entry 23 (Cadmium), Entry 27 (nickel if there are metallic components in direct and prolonged contact with the skin), Entry 43 (azocolourants and azodyes), entry 46a (nonylphenol ethoxylates), Entry 50 (polycyclic aromatic hydrocarbons – PAH), Entries 51 and 52 (phthalates), entry 72 (CMRs in textiles). Some of them are toy specific, not relevant for textiles apparel.	Acknowledged
395	4; 773	Regarding the reference on “Chromium VI compounds (relevant to leather articles)”. Could you please clarify if this is relevant for the small leather components that could be present in the Apparel Textiles under the proposed scope in section 3.2 (Apparel textiles-containing at least 80% by weight of textile fibres)?	Clarification provided Yes, the presence of Chromium VI compounds is relevant for small pieces of leather included in textile apparel. These would in the view of the authors constitute “leather parts” of articles in the sense captures in paragraph 6 of entry 47 of Annex XVII to REACH.
396	4; 778-779	Is enforcement of Reach on EU level possible?	Clarification provided Enforcement of provisions in the REACH regulation in Member States is carried out by competent authorities for REACH in each of the Member States. Coordination of enforcement projects and sharing of best practices, among other aspects, is discussed between Member State CAs in ECHA’s Forum for Exchange of Information on Enforcement.
397	4; 781	The ESPR introduces new toxicity classifications under substances of concern that are still pending to be defined in UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS). This means that many substances of Concern SoC will not be identified in the safety data sheets corresponding to the commercial chemical products used in the supply chain outside Europe, making impossible for the textile industry to identify and trace SoC used in their production process. How this will be addressed to ensure textiles suppliers will have access to his information?	Acknowledged Pending potential future developments under GHS, for new hazard classes introduced under CLP via Delegated Regulation (EU) 2023/707 operators may have to rely on checking harmonised classifications in Annex VI of CLP for relevant substances.
398	4.1.1; 799	It could be highlighted, that the list of POPs is evolving constantly.	Rejected

ID	Stated section; stated line	Comment	Answer
			It is true that the POs regulation is updated periodically to incorporate new substances identified under the Convention. This is also true for Annex VI of REACH to incorporate substances with new harmonised classifications or the Candidate list under REACH. We have not considered this clarification necessary in a general introduction to the different pieces of legislation,
399	4; 799	POPs legislation applies also to toys.	Acknowledged
400	4.1.1; 844, 848, 849	<p>The Empowering Consumers Directive is an essential tool. GOTS helps to provide consumers with reliable and honest information that helps them choose products that are more environmentally sustainable, prevents greenwash by use of un-verified claims, and so provides a transparent sustainability label. This is supported by: 1. Rules and Framework for Integrity; 2. Procedures for Integrity; 3. Measures for Integrity, outlined below.</p> <p>1. Rules and Framework for Integrity</p> <p>As a standard-setter, GOTS defines globally recognised requirements that ensure the organic status of textiles, from field to finished product. In addition the standard, the interpretation manual and the Conditions for the Use of GOTS Signs are integral parts of the GOTS system.</p> <p>> Independent, third-party inspection audit and certification of companies. It is done through accredited Certification Bodies (CBs). These are experts in their field, and GOTS relies on their proven competence, knowledge and experience. All certification decisions are within the responsibility and purview of the CBs. GOTS does not interfere with the decisions of the independent CBs.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>> Independent accreditation of CBs. GOTS has developed its own accreditation system for the approval of CBs, as well as for continuous monitoring of the approved CBs. As a prerequisite, CBs applying for approval as a GOTS certifier must already hold a valid accreditation to perform certification in accordance with ISO/IEC Guides 17011 and 17065.</p> <p>> The GOTS Quality Assurance Unit (QA) oversees and implements rigorous quality control procedures.</p> <p>2. Procedures for Integrity</p> <p>All participants in the GOTS system, from the smallest certified company to the largest CB, must consistently adhere to GOTS' mandatory requirements, which prevent fraud throughout the value chain.</p> <p>> GOTS has a robust complaint system where any individual or organisation is able to register a complaint about perceived violations of GOTS requirements. This ensures a formalised, timely and effective means of handling and resolving any complaints raised.</p> <p>> GOTS reviews all complaints rigorously and works closely with relevant partners (e.g. CBs, ABs) to conduct comprehensive, thorough investigations.</p> <p>> If evidence of wrongdoing come to light, GOTS takes swift and decisive action against all implicated parties to ensure that all issues are resolved and that the responsible party is held accountable. The GOTS system goes beyond industry standards, ensuring that only authentic organic products bear the coveted GOTS label.</p> <p>3. Measures for Integrity</p>	

ID	Stated section; stated line	Comment	Answer
		<p>The following concrete measures ensure organic fiber authenticity within the GOTS value chain, with some specifically applicable to cotton:</p> <ul style="list-style-type: none"> > Fibres entering the GOTS value chain must be certified organic according to a production standard recognised by the IFOAM Family of Standards. > Farmers/ICS groups must register in the GOTS Farm-Gin registry before their fibre are permitted to enter the GOTS system. Currently implemented in India, this requirement will soon be in effect globally. > All incoming raw material has to be reported to GOTS along with traceability to the respective farm group, including region, state and province of origin. Wherever the production standard provides for it, the TCs are required to be additionally submitted. > Raw cotton may not travel more than 500 km from the farm to the certified gin. This shorter trade chain protects vulnerable points and optimises the process for buyers. > GOTS approved CBs must verify the Farmers/ICS groups in the farm-gin registry before issuing lint TCs. <p>CBs must verify the Farm Scope and Transaction Certificates (SCs and TCs) of all materials entering the GOTS value chain.</p> <ul style="list-style-type: none"> > CBs must validate relevant traceability and transport documentation. > CBs conduct mandatory testing of all seed cotton for genetically modified organisms using ISO IWA 32 protocol, performed by qualified testing laboratories (e.g., ISO 17025), and further tests (such as pesticide residue testing as per section 5.2.7 of standard version 7.0), either randomly or in case of suspicion of contamination or non-compliance, based on the risk assessment by the CBs. 	

ID	Stated section; stated line	Comment	Answer
		<p>> Before issuing any TCs, CBs under GOTS must conduct a rigorous assessment including a mandatory plausibility check (volume reconciliation). First processing stage TCs are only issued by CBs after additional validity checks, such as first processing site capacities, stock positions, full traceability evidence back to the farm as well as verified financial transactions between concerned parties.</p> <p>> To strengthen integrity and traceability, GOTS also requires that the Farm TC number appears on the first GOTS TC at the ginning stage. The TC must state the origin for raw material, including region, state, and province. This effectively traces material back to the field and adds another layer of accountability to GOTS-certified fibre.</p>	
401	4.1.2; 851	<p>Several other legislative pieces should be mentioned here, for policy coherence:</p> <ul style="list-style-type: none"> - the CSRD, which is adopted but is still missing sector-specific standards. However, already the cross-cutting ESRS set 1 include reporting requirements on biodiversity, GHG emissions, deforestation, and other environmental impacts, as well as social impacts. - the CSDDD, which is finally on the brink of being adopted. Harm and impact on the environment, as well as on supply chain workers and affected communities relates to many of the issues affecting garment production. - the Forced Labour Instrument, on which Council and Parliament reached a deal on March 5, 2024. While there is no direct link with environmental impacts, it has in common with CSRD and CSDDD that all will rely on a much-improved traceability & transparency, including all tiers of production, within the garment/textile sector. <p>Forced labour can occur in any stage of production, but has historically been very prevalent in raw material sourcing. Chain of Custody mechanisms therefore should prepare for this 'dual use', where proof of e.g. organic cotton is also robust and specific</p>	<p>Partly accepted</p> <p>CSRD and CSDDD were added to the text. The Forced Labour Instrument will be included when revising the EU EEL criteria, which will address also social aspects. The ESPR does not address social aspects.</p>

ID	Stated section; stated line	Comment	Answer
		<p>enough to prove against forced labour.</p> <p>And many grave environmental risks occur in intermediate stages of production, implying that any robust, provable certification schemes will have to map, disclose, and report on all facilities in value chains (from raw materials to post-consumer waste management)</p>	
402	4.1.2 EU legislation in preparation; 852	<p>Alignment of ESPR and WFD. As eco-modulation will be further defined based on ESPR eco-design requirements, it is important to ensure full alignment between the two texts. Therefore, we recommend the European Commission to ensure that the preparatory work on home textiles and footwear is also advancing to ensure timelines are synchronised with the expected development of eco-modulation under EPR. The eco-modulation fee is a key instrument to stimulate the uptake of recycled content into garments and further develop the textile recycling value chain.</p> <p>EU End-of-Waste Criteria. The European Commission must ensure that the work done on ecodesign measures under the ESPR is aligned and consistent with legislation elsewhere. This alignment is particularly crucial for EoW criteria, especially concerning recycled content requirements under the ESPR. It is imperative that the timeline for implementing EoW is aligned with the ESPR delegated act to ensure the availability of recycled content.</p>	Acknowledged
403	4.1.2; 852	<p>Extended Producer Responsibility (EPR) requirements established under the revised Waste Framework Directive (WFD) need to be harmonised at EU level – this is essential to avoid fragmentation of the single market. Retailers and wholesalers are already experiencing differences and diverging implementation of waste legislation in Member States; covering different scopes, responsibilities and types of products.</p> <p>When developing ecodesign requirements related to recycled content, the different readiness of Member States in terms of recycling capabilities need to be taken into account. We need sufficient recycling infrastructures that can provide necessary feedstock to meet the future recycled content requirements. Not taking this into account can lead to challenges & impact the effectiveness of the future ecodesign requirements.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
404	4.1.2; 855-858	Only harmonisation at EU level of the EPR for textiles will leverage the effectiveness of PRO schemes (Producer Responsibility Organisations) in accelerating the development of the separate collection, sorting, reuse, preparation for recycling and recycling for textiles in the EU. To ensure sufficient feedstock to achieve textile-to-textile recycling and comply with possible eco-design requirements on recycled content, the EU must ensure the availability of secondary raw materials. Without sufficient feedstock to feed into the recycling pots and the necessary investments to develop textile-to-textile recycling infrastructure, the production of secondary raw materials, and overall circularity goals will be jeopardized.	Acknowledged
405	4; 856-858	<p>Only harmonisation at EU level of the EPR for textiles will leverage the effectiveness of PRO schemes (Producer Responsibility Organisations) in accelerating the development of the separate collection, sorting, reuse, preparation for recycling and recycling for textiles in the EU. To ensure sufficient feedstock to achieve textile-to-textile recycling and comply with a possible ecodesign requirement on recycled content, the EU must ensure the availability of secondary raw materials. Without sufficient feedstock to feed into the recycling pots and the necessary investments to develop textile-to-textile recycling infrastructure, the production of secondary raw materials, and overall circularity goals will be jeopardized. The EPR for textiles, if done correctly, will build the secondary raw materials market in Europe allowing the deleverage of EU dependencies on raw materials and resources. The EPR fees, along with public/private investments, will contribute to invest in high-quality preparation for recycling and recycling technologies. In order to do that, economies of scales among MS is key to ensure the creation of the secondary raw materials market. However, the lack of harmonization of the revision of the WFD (new provisions on EPR for textiles) is hampering the creation of the secondary raw materials market needed at EU level.</p> <p>On other hand, as eco-modulation will be further defined, it is important to ensure full alignment of scope between the WFD and the Delegated Act for Textiles.</p>	Acknowledged
406	4.1.2.; 857	Line 857, “waste management in line with the waste hierarchy”. For textile manufacturers it is not currently possible to trace post consumer waste.	Acknowledged
407	4.1.2; 863	Note that the scope for WFD är different: textile, textilerelated and footwear. Unclear how the ecomodulation will be implemented in the EPR if the product categories differ.	Acknowledged

ID	Stated section; stated line	Comment	Answer
408	Section 4.1.2; 864	A coherent policy framework should be designed so that the compositional analysis of collected textile waste (to be mandated through the ongoing revision of the Waste Framework Directive) and production date marking (which, in our view, should be made mandatory through the upcoming revision of the Textile Labeling Regulation), are used to inform the setting of Ecodesign requirements, and in turn the eco-modulation criteria based on them. In combination with requirements to disclose the total number and weight of products put on the market (as a prerequisite for participation in Producer Responsibility Organisations), this information on which products are used for the shortest periods of time would allow Ecodesign requirements to be set accordingly.	Acknowledged
409	Section 4.1.2; 864	A coherent policy framework should be designed so that the compositional analysis of collected textile waste (to be mandated through the ongoing revision of the Waste Framework Directive) and production date marking (which, in our view, should be made mandatory through the upcoming revision of the Textile Labeling Regulation), are used to inform the setting of Ecodesign requirements, and in turn the eco-modulation criteria based on them. In combination with requirements to disclose the total number and weight of products put on the market (as a prerequisite for participation in Producer Responsibility Organisations), this information on which products are used for the shortest periods of time would allow Ecodesign requirements to be set accordingly.	Acknowledged
410	4; 865	EU End-of- Waste Criteria. The EU Commission must ensure that the work done on eco-design measures under the ESPR is aligned and consistent with legislation elsewhere. This alignment is particularly crucial for EoW criteria, especially concerning recycled content requirements under the ESPR. It is imperative that the timeline for implementing EoW is synchronised with the ESPR Delegated Act to ensure the availability of recycled content.	Acknowledged
411	4.1.2; 865	<p>- EU End-of- Waste Criteria. The EU Commission must ensure that the work done on eco-design measures under the ESPR is aligned and consistent with legislation elsewhere. This alignment is particularly crucial for EoW criteria, especially concerning recycled content requirements under the ESPR. It is imperative that the timeline for implementing EoW is synchronised with the ESPR Delegated Act to ensure the availability of recycled content.</p> <p>- Alignment of ESPR and WFD: As eco-modulation will be further defined based on ESPR eco-design requirements, it is important to ensure full alignment between the two texts. Therefore, we recommend the EU Commission to ensure that the preparatory work on home textiles and footwear is also advancing to ensure timelines are synchronized with</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		the expected development of eco-modulation under EPR. Eco-modulation fee is a key instrument to stimulate the uptake of recycled content into garments and further develop the textile recycling value chain. A share of eco-modulation fees must go to the development of the recycling industry and should in addition be open for participation to operators from outside the EU.	
412	4.1.2; 868-878	GOTS provides a reliable way to meet the requirements of the GCD, it addresses greenwashing, makes a genuine and verified environmental claim and provides a clear approach that will fit with the GCD's aim for a clear regime for provision of the environmental credentials of the organic products that consumers buy. It is a transparent and robust labelling scheme that is not provided by any other public or private label scheme.	Acknowledged
413	4.2; 885	Reference 48; not the Danish Government, but parties in the parliament (Alternativet – SF)	Accepted The footnote was removed.
414	4.5; 885	Please include Textile Exchange standards to the analysis of environmental labelling/standards : https://textileexchange.org/standards/	Rejected What the stakeholder suggests are private schemes certifying the traceability of specific materials. The authors understand that these are neither standards nor environmental labels. The stakeholder is invited to provide arguments and evidence to their proposal.
415	4; 886	Please include in the legislation of non-EU countries the American's Act. The American's Act bill incentivises repair, reuse, recycling as well as reshoring or nearshoring to USA for textile manufacturing.	Acknowledged The authors invite the stakeholder to provide in the next consultation references to the specific American's Act.
416	4; 888	In France, toy disguise costumes do not fall under the Textiles EPR scheme (Refashion), but rather under the non-EEE Toy one (Ecomaison)	Acknowledged
417	4.2; 891	Sweden has not established and implemented an EPR. It has rather been investigated, but no legislation is in force.	Accepted The reference to Sweden was removed.
418	4.2; 892	Line 892 states that Denmark is currently moving towards establishing an EPR scheme for textiles. This is not the case. Denmark is not in the process of establishing a national EPR scheme for textiles, as the Danish Parliament rejected the proposal. However, Denmark is engaged in the revision of the Waste Framework Directive.	Accepted The reference to Denmark was removed.

ID	Stated section; stated line	Comment	Answer
		Furthermore, reference 48 states: “The proposal of the Danish government (2022/2 BSF 63) was rejected by the Danish Parliament”. This is not correct. The proposal was not from the Danish government, but from a party. It should be: “The proposal of a Danish party (2022/2 BSF 63) was rejected by the Danish Parliament”.	
419	4.2; 893	<p>At French level, the Federation has developed, within the framework of the national Climate Law, a method for evaluating the environmental performance of textile products as part of the call for contributions of the French government for the establishment of the Eco-Score. One of the particularities of the experimentation that was conducted by the Federation, with the support of its members, is that it aims to evaluate not only the environmental performance of products but also their social performance.</p> <p>The Federation is also working on the current Eco-Score methodology that was recently presented by the French government.</p> <p>At European level, the Federation is a voting member of the Apparel & Footwear PEF working group since 2020 and therefore takes an active part in the discussions on the establishment of a methodology measuring the environmental footprint of products at European level.</p> <p>We welcome the mention of the French Eco-Score in the JRC report for the sake of harmonisation of both national and European initiatives on this matter and are keen to participate in any discussions on this topic and to share our expertise both at French and European level.</p>	Acknowledged
420	4; 893	The French Eco-score for textiles does not apply to toys (including toy disguise costumes)	Acknowledged
421	4; 899-901	Final monitoring denim deal will be published July 2024 which we will send to you when available	Acknowledged
422	4.2; 911	<p>Existing relevant legislation to be considered in China:</p> <ul style="list-style-type: none"> • Renewable Energy law: The Renewable Energy Law is a framework policy which lays out the general conditions for renewable energy to become a more important energy source 	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>in the Peoples Republic of China. It covers all modern forms of renewable energy, i.e. wind, solar, water, biomass, geothermal and ocean energy. Link: http://english.mofcom.gov.cn/article/policyrelease/Businessregulations/201312/20131200432160.shtml https://npcobserver.com/legislation/energy-law/</p> <ul style="list-style-type: none"> • Circular economy promotion law: This Law is formulated for the purpose of promoting the development of the circular economy, improving the resource utilization efficiency, protecting and improving the environment and realizing sustainable development. https://www.fao.org/faolex/results/details/en/c/LEX-FAOC149802/ • Water Pollution prevention and control law: https://english.mee.gov.cn/Resources/laws/environmental_laws/202012/t20201211_812662.shtml • Decree 591 - regulations on safe management of hazardous chemicals: https://www.cirs-reach.com/China_Chemical_Regulation/Regulations_on_safe_management_on_hazardous_chemicals_China_2011.pdf • MEP order 7 – Measures for environmental management of new chemical substances: https://www.cirs-reach.com/China_Chemical_Regulation/Provisions_on_the_Environmental_Administration_of_New_Chemical_Substances_in_China_2010.pdf • Technical Specifications for Textile Safety: stipulates the safety requirements and testing methods for textile products. • Textile Labeling Management Measures: stipulates the management requirements for textile labeling, including labeling content, labeling form, etc. • Textiles Regulations: stipulates detailed requirements for the production, sales, import and other aspects of textiles to ensure the quality and safety of textiles. • Environmental Protection Law of the People's Republic of China: term no.30 and term 	

ID	Stated section; stated line	Comment	Answer
		<p>no.33.</p> <ul style="list-style-type: none"> • Wastewater Prevention and Control Law of the People's Republic of China: term no.22 • Solid waste pollution prevention and control law of the PRC: term no.5 no.7 no.9 • Energy Conservation Law of the PRC: term no.7 no.21 no.23 no.34 no.44 <p>Relevant legislation to be considered in Bangladesh:</p> <p>Existing legislation:</p> <p>Climate:</p> <ul style="list-style-type: none"> - Integrated Energy and Power Master Plan (IEPMP) 2023 -Renewable Energy Policy, 2008 (under revision) - Net Metering Guidelines, 2018 (under revision) <p>Chemicals: The Environment Conservation Rules, 1997 https://faolex.fao.org/docs/pdf/bgd19918.pdf</p> <p>Water: Bangladesh Water Rules 2018</p> <p>Upcoming legislation:</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Climate: In connection with the Bangladesh Government's commitment to source 40% of energy from renewable resources by 2041, Corporate Power Purchase Agreement (CPPA) is underway. Revision of Renewable Energy policy 2008 and Net Metering Guidelines, 2018 are in progress</p> <p>Chemicals: National Chemical Management Rules and Chemical Management Guidelines for Bangladesh's textile and garments industry are underway which will align with the GHS (Global Harmonized System). requirement</p> <p>Water: Industrial water pricing policy is under development</p> <p>911: Existing relevant legislation to be considered in India:</p> <p>Chemicals:</p> <p>Environment (protection Act), 1986 https://www.indiacode.nic.in/bitstream/123456789/6196/1/the_environment_protection_act%2C1986.pdf</p> <p>Manufacture, Storage and Import of Hazardous Chemical Rules, 1989, https://nagarikmancha.org/images/MANUFACTURE,%20STORAGE%20AND%20IMPORT%20OF%20HAZARDOUS%20CHEMICAL%20RULES,%201989.pdf</p> <p>Draft Chemicals (Management and Safety) Rules, 20xx https://files.chemicalwatch.com/NEW%20OCR%20draft_%2007092020.pdf</p>	

ID	Stated section; stated line	Comment	Answer
		<p>911: Existing relevant legislation to be considered in Pakistan:</p> <p>Water: National Environmental Quality Standards - https://www.mocc.gov.pk/Detail/MDUzMDI1OGItYWYzZCOONzQOLThZWItZjYzY2RkOTkyZGVh</p> <p>Chemicals: Pakistan Environmental Protection Act, 1997 https://www.mocc.gov.pk/Detail/MDUzMDI1OGItYWYzZCOONzQOLThZWItZjYzY2RkOTkyZGVh</p> <p>Hazardous Substances Rules, 2003 https://mocc.gov.pk/SiteImage/Misc/files/Hazardous%20Substances%20Rules%2C2003%20%28Draft%29.pdf</p> <p>National Chemicals Management Policy, National Chemicals Control Act, 1) Require chemical labeling according to GHS, otherwise export products may not be able to fulfil future ESPR</p> <p>911: Existing relevant legislation to be considered in Vietnam:</p> <p>Chemical Law (2017) https://www.chemsafetypro.com/Topics/Vietnam/vietnam-chemical-law.pdf The Chemical Law provides regulations on chemical handling, safety in chemical handling, right and obligations of organizations and individuals engaged in chemical handling, and state management of chemical handling.</p>	

ID	Stated section; stated line	Comment	Answer
423	4.2; 911	<p>Existing relevant legislation to be considered in Türkiye:</p> <p>Existing legislation:</p> <p>Circular economy:</p> <p>Law: Turkey 2023/3 -Communiqué on Import Control of Wastes Kept Under Control for the Protection of the Environment</p> <p>Status: In Forced</p> <p>This law Prohibitions of imports for post-consumer waste in local legislation. Only possible in 2 conditions;</p> <ul style="list-style-type: none"> - Shredded post-consumer could be imported according to current legislation. - Post consumer would be imported with a special export registration permission which needs a lot of administrative work. No feasible and sustainable for scale up business model <p>At the stage of importation of these products (clothing clippings), only a Temporary Activity Certificate or Environmental Permit and License Certificate must be obtained from the Ministry of Environment and Urbanization. Even if these products are to be imported only under the Inward Processing Regime, these documents are not required. In other words, there is no problem in terms of the import of fabric/clothing clippings, which are intermediate materials for our industry, when it is encouraged that they are imported by manufacturers.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>Law: Regulation amending the Zero Waste Regulation</p> <p>(Official Gazette No. 31623, 9th of October 2021.</p> <p>Status: In Force</p> <p>This Regulation makes several amendments to the Principal Regulation regarding the collection of domestic, commercial and institutional wastes within precautionary principle to protect the environment and human health; processing of wastes collected within the scope of zero waste management system only in waste processing facilities that have obtained a temporary operating certificate/environmental license from the Ministry; the establishment of waste collection centers at the provincial level; and the obligation for regular update of Zero Waste Information System. Moreover, Annex-III/B - Criteria for buildings and campuses is amended regarding the establishment of a system for separate accumulation at source in order to take measures to prevent food waste in wholesale markets to ensure the recycling of food wastes and carrying out the necessary work on the separate collection and recycling of bio-degradable wastes.</p> <p>Revisions underway: Turkey is setting target for zero waste and related regulation is inforced, but strategy</p> <p>and roadmap to achieve this target is not finalized yet. Ministry of Environment is still working on creating this strategy and related regulations</p> <p>Climate: Law: Environment Law No: 2872</p> <p>Status: In Force</p>	

ID	Stated section; stated line	Comment	Answer
		<p>The purpose of this Law is to protect the environment in line with the principles of sustainable environment and sustainable development</p> <p>The 34 articles of the Law are divided into 6 Sections: Objective, Definitions and Principles</p> <p>(1); Higher Board of Environment and its Functions (2); Precautions and Prohibitions Regarding Environmental Protection (3); Environmental Pollution Prevention Fund (4); Penal Provisions (5); Miscellaneous Provisions (6). Furthermore, there are 16 Additional Clauses regarding the principles regarding the protection of soil and prevention of pollution, protection of air quality and prevention of air pollution, recycling contribution fee, prevention of environmental pollution due to plastic bags, and the establishment of environmental labelling system.</p> <p>Water: Water Pollution Control (1988) https://www.ecolex.org/details/legislation/regulation-for-water-pollution-control-lex-faac013466/</p> <p>Regulation on Wastewater Discharge (2013) protection of wastewater infrastructure facilities, procedures and principles regarding the determination of wastewater discharge principles and prevention of water pollution</p> <p>Environment Law, 1983 https://www.ecolex.org/details/legislation/environment-law-no-2872-lex-faac007700/</p> <p>Chemicals: Turkey REACH (2017) https://tr.lisam.com/tr/kkdik-turk-reach/kkdik-turkish-reach/</p>	
424	4.3 Strategies of the United Nations;	Take social impacts of ESPR legislation for textiles into account. The preparatory study notably overlooks the integration of social aspects into its assessment framework, a critical oversight that undermines the holistic evaluation of sustainability in the textile sector. Sustainability, by its very nature, encompasses not only environmental but also social dimensions, including labour rights, fair wages, working conditions, and community	<p>Rejected</p> <p>The PS is developed under the framework of the ESPR. The JRC cannot change the Regulation. The ESPR does not include social aspects in its scope.</p>

ID	Stated section; stated line	Comment	Answer
	922 6. Address social issues along the value chain.	impact. The exclusion of these social factors from the JRC's analysis fails to acknowledge the complex interplay between environmental sustainability and social responsibility within the textile industry. By not considering these social aspects, the JRC's study risks perpetuating a narrow view of sustainability that neglects the well-being of the workers and communities behind the textiles and may hinder the EU in achieving its international commitments on the United Nations SDGs.	Social aspects will be addressed when revising the EU Ecolabel criteria.
425	4; 924	Another reason to support the exclusion of disguise costumes from the scope of the delegated act: toy disguise costumes shall be tested and compliant with relevant EN 71 (safety of toys), harmonised under the TSD: EN 71-1 (mechanical and physical properties), EN 71-2 (flammability), EN 71-3 (migration of 19 elements). In case they may have an electric feature, then EN 62115 also applies. The testing requirements for toys are already covering the needs of textiles apparel, so including the product in the scope of the delegated act would bring only additional burden to manufacturers, who will be forced to comply with duplicated and potentially conflicting provisions.	Acknowledged
426	4.4. Tests & standard s. 4.5. voluntary labels; 929 - 977 See also tables 48 to 55 (lines 3544 onwards) 978 - 1026 Table 56	<p>The report mentions main standards used by industry.</p> <p>As per our reflection in the PEFCR TS, we recommend to carefully assess the relevant and cost effectiveness of each test to measure the product's performance.</p> <p>The list of voluntary labels lacks methodology, and the relevance of the labels and standards should be assessed and aligned the proposal for a Directive on Green Claims. We recommend prioritizing third-party standards and differentiating labels focusing on material from the ones on the whole products.</p> <p>We notice that there are no Textile Exchange standards and would like to understand why. Similarly, some standards seem to address social aspects. We believe that social</p>	<p>Clarifications needed from the stakeholder</p> <p>The authors do not understand the methodology that the stakeholder refers to. This section does not aim to provide any prioritization among available voluntary environmental labels.</p> <p>The certification schemes provided by Textile Exchange are not reported in this section because the authors understand that they are neither standards nor environmental labels.</p> <p>Social aspects will be addressed when revising the EU Ecolabel criteria. Social aspects do not fall into the scope of the ESPR.</p>

ID	Stated section; stated line	Comment	Answer
	(line 3630	requirements should be set at company-level, not at product level and hence, that such labels are here irrelevant.	
427	Section 4.4; 929-977	Line 937 refers to standards used in the textile industry. However, the standards mentioned in this section and in tables 48 to 55 only focus on the end-product and not on textile production. For instance, the EU Ecolabel includes criteria on chemical and process of production stages where standards are used to demonstrate compliance with the criteria. It is important to capture those standards too.	Acknowledged The new version of the text includes more standards.
428	4.4 Tests and standard s; 929-977	Standards are indeed crucial to be able to measure the release of microplastics from textiles and a number of ISO/CEN WGs are actively working on the issue (see attached - sent to the email address). [...] is itself is working actively internally on the topic and as Liaison Organization is involved in some of those ISO/CEN WGs and can be contacted for further exchange and information.	Acknowledged
429	Section 4.4; 929-977	Line 937 refers to standards used in the textile industry. However, the standards mentioned in this section and in tables 48 to 55 only focus on the end-product and not on textile production. For instance, the EU Ecolabel includes criteria on chemical and process of production stages where standards are used to demonstrate compliance with the criteria. It is important to capture those standards too.	Acknowledged The new version of the text includes more standards.
430	4.4; 929	Determination of tests: In the study, a list containing more than 150 tests was published. These test requirements should be planned and implemented in a way that does not impose an undue cost burden on the industry. Therefore, within the scope of the preparations for the directive, focus group meetings with stakeholders (industry experts, academia, textile engineers, as well as selected consumer and design groups, etc.) including the sector in both the EU and Türkiye (by being a biggest supplier to the EU, as well as customs union partner) to verify eco-design criteria is advised.	Acknowledged
431	4; 929-962	Standards referring to products' safety and are mandatory by law could be included	Acknowledged Any measure under the ESPR should not affect product safety. We report standards that are relevant for the aim of the PS. The authors invite the stakeholder to point out specific standards that they think are relevant for the scope of the PS and that are mandatory due to product safety.

ID	Stated section; stated line	Comment	Answer
432	4; 929-962	It could be usefull to have a look into the end-of-waste criteria and waste shipment directive and align them.	Acknowledged
433	4.4; 929	In section 4.4. "Tests and standards" As highlighted during the JRC stakeholder consultation meeting on 18-19 March, a test standard for determining the composition of recycled products should be proposed. In addition, a traceability and testing standard could be set to identify pre-consumer waste and post-consumer waste. A standard should be set to identify mechanical, thermomechanical, thermochemical and chemical recycling techniques and to ensure the traceability of the materials produced by these processes. Identification of pre-consumer and post-consumer wastes will also be useful in the measurement of environmental impacts and the creation of taxation and incentive systems.	Acknowledged Standards that are not available will be identified in the development of the PS according to the proposed ecodesign requirements.
434	4.4 Test and standard s; 930 – 977	[...] welcomes the analysis of the JRC of existing tests and standards and wishes to provide feedback based on the sporting goods industry's practices. Tables 48 – 55 list standards available for the textile industry, but the lists include standards beyond those applied to the apparel and apparel industries, applicable to such product categories as specialty apparel beyond the scope of the delegated act, footwear, and home textiles. Moreover, the industry wishes to highlight that some of the listed standards are not test methods, but rather measurement technologies and should be further evaluated before setting specific methods for the ecodesign requirements.	Acknowledged Some of the comments proposed were implemented other acknowledged and rejected because the standard was related with textile products (which is the objective of the tables). The comments related with table 49 were not implemented because the table refer to standards that appear in different schemes.
435	4.4; 933	Future ecodesign requirements will need to be verifiable - we welcome the EC approach to refer to existing standards.	Acknowledged
436	4.4; 933-936	<ul style="list-style-type: none"> - We welcome the approach taken in the preparatory study to map existing test methods and standards as a potential basis for eco-design measures. Eco-design measures must be measurable and verifiable. - Given the that the global nature of the apparel sector, it is critical to refer to international standards/ISO standards and/or the standard that is most prevalently used by the global apparel industry for the future eco-design measures. - When setting rules on how to comply with eco-design measures, it will be critical to 	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>ensure scalability, affordability and efficiency to avoid over-extensive testing.</p> <ul style="list-style-type: none"> - Given the number of tests that are anticipated to have to be undertaken, we propose to adopt a risk-based approach for ensuring compliance with eco-design measures as applied under the REACH Regulation or the General Product Safety Regulation. It is essential to note that it is neither commercially nor effectively possible to test all products that are placed on the European market: Manufactures will of course be responsible/liable for placing safe and conform products on the market, and should thus set up internal testing program aimed at identifying and testing products with the highest risk of non-compliance, leveraging the manufacturer's expertise and substantial knowledge. - Compliance should not be documented on every product, as applied under the chemicals and product safety rules, but authorities should do random checks. 	
437	4; 933-936	MEErP is focussing on energy related products. CEN/TC248 is working on circular aspects on specific textiles because textiles clearly need a different approach.	Acknowledged
438	4; 937	<p>As we propose that sustainable renewable content should be recognised as a circular input, this should also be taken into account when designing and selecting the verification methods for raw materials.</p> <ul style="list-style-type: none"> • For example, the ISCC Plus certification recognises both biobased and recycled content: https://www.scsglobalservices.com/services/iscc-plus-certification 	<p>Rejected</p> <p>What the stakeholder suggests is a private scheme certifying specific characteristics of the material. The authors understand that this certification scheme is neither a standard nor an environmental label.</p>
439	4.4; 943	<p>[...] calls for aligning the PEFCR with the requirements set in the Eco-design directive. As of now, PEFCR does not set any requirements for neither chemicals, durability nor quality in textile products. This gap should be revised, to align with other legislations, such as ESPR, etc.</p> <p>Durability</p> <p>[...] recommends the Commission to set minimum requirements for durability. Depending on the product, it should live up to requirements after five cleaning cycles (number of washes). In addition, the recommended tests should be fully harmonized with ISO</p>	Acknowledged.

ID	Stated section; stated line	Comment	Answer
		<p>international standards. We also recommend assessing why textile products are being discarded before adding science-based requirements on emotional durability. The amount of documentation required for the PEFCR is at a scale that is merely doable for SME's. This is also, because the method is product specific, and thus every single product needs to be documented. It is therefore crucial to revise the PEFCR method and decrease the administrative burden in order for all companies to be able to follow along and avoid a competitive distortion.</p> <p>Primary vs. secondary data The PEFCR method is based on a database. This means that it is average data from what is available. Knowing that there is a lack of data in the textile industry, this is problematic, as the results might not be very accurate. In addition, it doesn't allow companies to provide their primary data, which makes it even less accurate. [...] deems this as being very problematic, as the results don't necessarily mirror the actual environmental impact of a product.</p>	
440	Section 4.4; 953-955	<p>Only environmental concerns are mentioned in relation to substances of concern. However, the final ESPR compromise clearly states that "the establishment of performance requirements shall also where appropriate, reduce significant risks to human health or the environment". Therefore we believe that performance requirements on chemicals should not just focus on their environmental impact, but also on reducing risks to human health by limiting chemical use in the production process and on the final product.</p>	Acknowledged
441	Section 4.4; 953-955	<p>Only environmental concerns are mentioned in relation to substances of concern. However, the final ESPR compromise clearly states that "the establishment of performance requirements shall also where appropriate, reduce significant risks to human health or the environment". Therefore we believe that performance requirements on chemicals should not just focus on their environmental impact, but also on reducing risks to human health by limiting chemical use in the production process and on the final product.</p>	Acknowledged
442	4; 958-959	<p>The Netherlands will start with a study to the aspects of an environmental labels for textiles. The study is expected to start in April 2024 and will be published end of 2024.</p>	<p>Acknowledged The authors invite the stakeholder to share the study as soon as it will be possible.</p>

ID	Stated section; stated line	Comment	Answer
443	Section 4.4; 966 - 967	<p>ISO 9073 for nonwoven is divided into 12 parts and covers more than tensile strength and elongation:</p> <p>Part 1: Determination of mass per unit area</p> <p>Part 2: Determination of thickness</p> <p>Part 3: Determination of tensile strength and elongation</p> <p>Part 4: Determination of tear resistance</p> <p>Part 6: Absorption</p> <p>Part 7: Determination of bending length</p> <p>Part 8: Determination of liquid strike-through time (simulated urine)</p> <p>Part 9: Determination of drape coefficient</p> <p>Part 10: Generation of lint and other particles in the dry state</p> <p>Part 11: Run-off</p> <p>Part 12: Demand absorbency</p> <p>Furthermore, some of the standards listed in Table 48 may be applicable to nonwovens even if they focus on woven/knitted.</p>	<p>Acknowledged</p> <p>The information provided was already included along the tables.</p>

ID	Stated section; stated line	Comment	Answer
444	Section 4.4; 966 - 967	<p>ISO 9073 for nonwoven is divided into 12 parts and covers more than tensile strength and elongation:</p> <p>Part 1: Determination of mass per unit area</p> <p>Part 2: Determination of thickness</p> <p>Part 3: Determination of tensile strength and elongation</p> <p>Part 4: Determination of tear resistance</p> <p>Part 6: Absorption</p> <p>Part 7: Determination of bending length</p> <p>Part 8: Determination of liquid strike-through time (simulated urine)</p> <p>Part 9: Determination of drape coefficient</p>	<p>Acknowledged The information provided was already included along the tables.</p>

ID	Stated section; stated line	Comment	Answer
		<p>Part 10: Generation of lint and other particles in the dry state</p> <p>Part 11: Run-off</p> <p>Part 12: Demand absorbency</p> <p>Furthermore, some of the standards listed in Table 48 may be applicable to nonwovens even if they focus on woven/knitted.</p>	
445	4.4; 968	<p>There are no analytical test methods available to identify if a material is recycled or virgin, and therefore verification and compliance could likely rely on chain of custody documentation like GRS.</p> <p>An alternative to chain of custody certificates could be tracers, but currently they do not identify the recycled content in percentage neither in the total parts of the garments. Also, depending of the type of recycled fibre (cotton based, RPET, or mechanical vs chemical,... the feasibility of a tracer is not out there). For that reason tracers are not ready and or available to substitute chain of custody systems. However a Transaction Certificate must identify in the future the pre vs post-consumer waste and the type of recycling.</p>	Acknowledged
446	4.4 Tests and standard	We welcome looking at existing standards for the verification of upcoming eco-design measures. Regarding recycled content verification, we recommend alternatives to the existing certification systems on the market, like an audit-based approach rather than	Acknowledged

ID	Stated section; stated line	Comment	Answer
	s; 968-970	<p>relying on certifications. Certifications (as e.g. GRC) have a tendency to become monopolies that cause extremely high costs to all actors independent of their compliance level. They require 100% rigid documentation for each Supply Chain action while audit-based approaches do spot-checks and could be adjust to the respective performance level of the actor – in terms of costs and efforts.</p> <p>Audit-based systems combined with public transparency additionally use public pressure to leverage the impact of deviations from the intended goals. As such, transparent audit-based approaches highly penalize dishonest actors while it minimizes the costs to those actors that comply.</p> <p>Transparency through auditing is deemed more economically efficient than traceability methods, while it can provide the same level of compliance.</p>	
447	4.4 - Tests and Standard s; 969	<p>Textile Exchange’s Global Recycled Standard (GRS - https://textileexchange.org/recycled-claim-global-recycled-standard/) is a standard that specifies the percentage of recycled materials and thus also the percentage of virgin materials used in a product.</p> <p>However, to the best of our knowledge, there are no testing option available to measure the composition of mechanically recycled fibersthat can help us determine or differentiate between virgin and recycled fibers, hence the chain of custody standards model, as Textile Exchange’s Content Claim Standard (CCS https://textileexchange.org/content-claim-standard/), is critical. No methods that can help determine this difference between virgin and recycled fibres are recognized yet.</p> <p>For further Information, please refer to the Textile Tracer Assessment co-published by Textile Exchange and Fashion for Good in July 2022:</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>https://reports.fashionforgood.com/wp-content/uploads/2022/07/The-Textile-Tracer-Assessment.pdf</p> <p>This report is a detailed analysis for benchmarking physical tracer technologies relevant in the textile industry. This report is the first step to creating an open-source guide where all interested parties can identify which tracer technologies are best suited for their traceability motivations, use cases, and scope.</p>	
448	4.5 Voluntary environmental labels; 969	Textile Exchange Preferred fibre and Material Matrix (PFMM) is a tool to list/analyze different environmental labels used in the textile industry (https://textileexchange.org/about-materials-matrix/). Based on updated figures as at end March 2024, in 2023, there were 74.8k certified sites in 98 countries globally. This comprised of 58% GRS, 18% OCS, 17% RCS, 4% RAF includes RWS, RMS & RAS), 2% RDS and less than 1% CCS. Please see comment 3 for the details and breakdown of the standards aforementioned.	Acknowledged
449	Section 4.4 Tests and standards; 971: "In addition to the investigated standards, the textile industry widely deploys a multitude	<p>There are of course many other industry standards related to the textile industry.</p> <p>Examples from the wool industry are:</p> <p>Woolmark certification – determines the quality of wool products</p> <p>https://www.woolmark.com/industry/certification/</p> <p>International Wool Textile Organisation (IWTO) Specifications –</p> <p>Examples are:</p> <p>IWTO-50-1994: The Measurement of Dimensional Stability and Hygral Change in Woven Fabrics</p>	Rejected What the stakeholder suggests are private schemes certifying specific characteristics of the material. The authors understand that these certification schemes are neither standards nor environmental labels.

ID	Stated section; stated line	Comment	Answer
	of other standards that are tailored to specific industrial sectors or regional contexts.”	<p>IWTO-51-1994: Measurement of the Stability of Surface Finish on Woven Wool Fabric (amended 1994)</p> <p>IWTO-65-2013: Determination of Pilling and Fuzzing of Wool and Cashmere Knitted Fabrics Using the Pill Box</p> <p>An overview of all IWTO specifications can be found here</p> <p>https://cdn.ymaws.com/www.member.iwto.org/resource/resmgr/publications/index_red_book_2017.pdf</p>	
450	Standards and Labels Q&A (18 March online consultation); Slides page 24	<p>1. Are there very commonly used standards that are not included in the list? Which are they?</p> <p>Textile industry frequently uses other standards (e.g., Global Recycled Standard (GRS) and Recycled Claim Standard (RCS) than ISO/EN ones.</p>	<p>Rejected</p> <p>What the stakeholder suggests are private schemes certifying specific characteristics of the material. The authors understand that these certification schemes are neither standards nor environmental labels.</p>
451	Section: Standards and Labels Q&A (18 March online consultation); Slides page 24	<p>3. Is there a standard capable of measuring the composition of mechanically recycled fibres?</p> <p>We suggest including standards, labels, or similar related not only to mechanical recycling, but also to chemical recycling (e.g. ISO/CD 15270-4 for chemical recycling of plastic materials) and chain of custody models (e.g. ISO/CD 13662 on mass balance).</p>	<p>Rejected</p> <p>What the stakeholder suggests are private schemes certifying specific characteristics of the material. The authors understand that these certification schemes are neither standards nor environmental labels.</p>

ID	Stated section; stated line	Comment	Answer
		Content Claim Standard (CCS): it relies on batch-level segregation of certified products, for both 100% certified content and blended products. CCS certification verifies that chain of custody principles are followed at each stage of production. It tracks verified input material through the supply chain and applies to any product, from any industry. It uses volume reconciliation criteria which provide an option for mass balance credit accounting at an individual site's level. Source: Textile Exchange	
452	4.4; Question Are there very commonly used standards that are not included in the list? Which are they?	The list seems to cover all common tests. On the other hand, it is advised that, regarding the coverage of tests in the delegated act, a specific workshop may be done with the participation of textile engineers and industry experts from the academia, research centers and industry.	Acknowledged
453	4.4; Question Are there standards which could be helpful in the development of the PS that were not included	There is no available standards on recyclability; the quality and durability of recycled content for fabric for clothing; reparability etc. A specific study needs to be done on 1) the classification of existing test; 2) the determination of which tests are needed on the basis of separate goals of the PS; 3) a workplan for the continuous reviewing of tests with the starting of the implementation.	Acknowledged

ID	Stated section; stated line	Comment	Answer
	in the list? Which are they?		
454	4.4; Question Is there a standard capable of measuring the composition of mechanically recycled fibres?	There is not available test currently, however, there is research projects both on the EU level, as well as in Türkiye.	Acknowledged
455	4.5 Voluntary environmental labels; 978 ff.	<p>The section lacks an analysis of the type of products covered by the labels to inform the scope considerations.</p> <p>It is also not clear whether the labels have been analysed in such a way that it is methodologically coherent with the other sections. Table 9 shows the “top topics addressed by environmental labels for textiles globally in 2021” but this is not in line with e.g. environmental hot spots or possible ecodesign / product aspects. Especially with regards to the ecodesign product aspects that concern the production process e.g. energy use and energy efficiency or water use and water efficiency, there are approaches provided in environmental labels that could further be explored for the development of ecodesign requirements.</p> <p>E.g. the Blue Angel has introduced information requirements for energy and water consumption (“Textile finishing companies must submit information on their average energy (kWh/kg textile) and water (l/kg textile) consumption per year, which is consumed</p>	<p>Rejected</p> <p>The section reports the voluntary environmental labels that address products included in the scope of the PS. The scope of the PS is selected following the criteria set in the ESPR.</p> <p>Table 33 in section 7.4 reports the scope addressed by EU Ecolabel, Blue Angel and Nordic Swan. As reported in section 1 (methodology), the development of the ecodesign requirements follows the directions established by the mandatory framework of the ESPR with the methodology defined by the MEErP.</p> <p>Task 5 will report a detailed environmental and economic assessment that will serve to analyse the important environmental and economic aspects</p>

ID	Stated section; stated line	Comment	Answer
		<p>or measured during pretreatment, dyeing and finishing of textiles (including the associated washing and drying processes), preferably specific to the textile product certified with the environmental label.”) Those reporting obligations are intended to examine future benchmarking.</p> <p>To conclude, environmental labels already contain ecodesign requirements that can be used for benchmarking.</p>	<p>aspects to focus on when proposing design options in Task 6.</p>
456	4.5 Voluntary environmental labels; 978	<p>Apart from the EU Ecolabel, other organic textile certification schemes should be promoted. Unfortunately, greenwashing is an enormous problem in the sector. Greenwashing means that false or misleading claims are made about how environmentally friendly a product is. Consumers are misled into believing that they buy sustainable products, by qualifications such as “green”, “conscious”, or even “recycled”. These terms suggest that a textile product is sustainable, without giving any proof or substantiation of this claim. 42 % of green claims in the textile sector are false, exaggerated or deceptive.</p> <p>(https://ec.europa.eu/commission/presscorner/api/files/document/print/en/ip_21_269/IP_21_269_EN.pdf). [...] therefore thinks that the term “organic” for fibre content should be protected, e.g. in the context of the textile labelling regulation. But this makes sense only if the implementation will be controlled, meaning that the term “organic” can only be used if this is verified by a certification system that controls that the term is not misused.</p>	<p>Acknowledged</p> <p>This section focuses on voluntary environmental labels.</p> <p>Future steps of the PS will investigate the ways to produce the material used in textile apparel.</p>
457	4.5; Question Are there further studies analysing the environmental labels used in the textile	<p>Not available study, but there are some initiatives in Türkiye.</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
	industry? Which are they?		
458	4; 1231-1420	Please do not assume that Euratex data represents the industry, as their data is only about manufacturing and not include retail.	Acknowledged The authors would welcome additional data about retail of textile apparel.
459	4.1 Reasons for the disposal of apparel; 2060-2061	<p>Our review of waste audits and wardrobe studies suggests that 37% of garments are disposed of for reasons related to their intrinsic quality, while lack of perceived value accounts for 35% of the garments disposed of, and 28% are disposed due to poor fit (Laitala & Klepp, 2022). All in all, the main reason for growing volumes of textile waste is growth in production volumes, and this is not properly addressed in the document.</p> <p>When clothes pile up in many consumers' wardrobes, and in (waste)streams of used clothes, and more and more are disposed of without being “used up”, the responsibility for this must be assigned to those who have profited from selling them, not the consumer.</p> <p>The marketing of apparel has been massive, along with the marketing of other appearance-related products (make-up, plastic surgery and more) where the main message has been that most people (and especially women) need to constantly improve, and they need to buy something new to be socially acceptable. The push to buy new stuff is enormous, and it is underpinned by something we are all (especially young people) afraid of: not being good enough. The document as a whole, lacks a discussion of the role of marketing in the impasse we are in. How much is sold at a discount? How many new collections are released per year? How can the marketing be made more neutral and factual? Can forms of marketing be banned? The planned Textile Strategy and Ecodesign for Sustainable Products Directive are both aimed at design, but it is not design, rather marketing, that has been driving the increase in products entering the market.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>Reference</p> <p>Laitala, K., & Klepp, I. G. (2022). Review of clothing disposal reasons. https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/</p>	
460	Section 4.4 Tests and standards; Table 49, page 163, Fabric Tear Strength and Fabric Tensile Strength	<p>This table sites thresholds and tests from PEFCRv1.3 which has been superseded by v2.0 but the basic issues remain; namely that the physical testing protocol rates synthetics as more durable and hence longer lived than products made from natural fibres and thus assigns synthetics smaller footprint, even though no robust science-based evidence exists to support the premise that stronger fibres lead to higher number of wears per lifetime. In fact, the evidence is clear that the majority of clothing reaches end-of-life for reasons unrelated to physical durability, namely lack of perceived value by the consumer and poor fit.</p> <p>Source: Kirsi Laitala and Ingun Grimstad Klepp, SIFO - Review of clothing disposal reasons, 2023: https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/</p>	Acknowledged
461	Voluntary environmental labels used in EU; 3628	Oeko-tex Step, Oeko-tex made in green, RCS (recycle claim standard), fair wear foundation, Global recycled standard (GRS), Responsible wool standard (RWS).	<p>Rejected</p> <p>Oeko-Tex Standard 100 is included in the Table 56. This table includes voluntary environmental labels. The stakeholder is invited to provide information about the referenced schemes and reasons about they think these schemes are environmental labels.</p>

8 Comments on section 5 – Market analysis

8.1 Comments from ID 462 to ID 500

Table 9. Comments on section 5 – Market analysis. From ID 462 to ID 500

ID	Stated section; stated line	Comment	Answer
462	5 Market analysis & 5.4 Main elements affecting the production of apparel textiles; 1,034 ff. & 1,235 ff.	<p>@ line 1,034 ff.: Our experience in the preparatory studies for energy-related products has shown that good market data is crucial for impact assessment and that market data is rarely available in the required form. Therefore, the market data should be critically examined. We miss a discussion on the suitability of the market data and how the market data might affect environmental impact projections.</p> <p>@ line 1,235 ff.: Section 5.4 is about fibres, chemicals, energy and water being used. When describing the resources used, the section must contain measures for e.g. the efficient use of resources.</p> <p>We would therefore like the following information to be added:</p> <p>For fibres: important sources (for the recycling e.g. Duhoux et al. 2021) and technologies (e.g. different recycling technologies) and market dynamics are missing.</p> <p>(Duhoux, Tom; Maes, Edwin; Hirschnitz-Garbers, Martin; Peeters, Karolien; Asscherickx, Lise; Christis, Maarten et al. (2021): Study on the technical, regulatory, economic and environmental effectiveness of textile fibres recycling. Final Report. https://op.europa.eu/en/publication-detail/-/publication/739a1cca-6145-11ec-9c6c-01aa75ed71a1)</p>	<p>Rejected</p> <p>@ line 1 034 ff This section gathers all available information about the market of the products in the scope. The stakeholder is invited to provide additional data they would have available. Task 7 will focus on future scenarios. At this stage the PS will assess the available data and their use in the projections into the future.</p> <p>@ line 1 235 ff Resource efficiency is one of the product aspects listed in Article 5 of the ESPR. This product aspect will be investigated in Tasks 4, 5 and 6 of the PS. The authors think that this is not the suitable section where reporting such analysis.</p> <p>The stakeholder is invited to provide references and or evidence about the water demand of hemp.</p>

ID	Stated section; stated line	Comment	Answer
		<p>For chemicals, the section only reflects absolute quantities and the functional types of chemicals and does not take into account the difficulties associated, e.g. their different hazards, lack of hazard data for chemicals or their non-disclosure for confidentiality reasons, and generally the difficulty to track the use of chemicals throughout the production chain. (Bour, Agathe; Budde Christensen, Thomas; Hunka, Agnieszka D.; Palmqvista, Annemette; Skjold, Else; Syberg, Kristian (2023): Implications of circular textile policies for the future regulation of hazardous substances in textiles in the European Union; Science of the Total Environment 896 (2023) 165153; http://dx.doi.org/10.1016/j.scitotenv.2023.165153)</p> <p>The section also does not reflect the new concept of substances of concern. Moreover, it could be discussed which sustainable alternatives are on the market that are applicable in practice (with the same result).</p> <p>Water demand: We ask to review the statements regarding the water demand of hemp. To our knowledge, other studies have come to the conclusion that hemp has a significantly lower water requirement than cotton.</p>	
463	5.5 Market structure and business models; 1,398	<p>The online sales should receive more attention with regards to e.g. functioning and location of the sellers. This is important in view of a future compliance with ecodesign requirements for online sales as well as market surveillance and enforcement measures.</p> <p>Experience with energy-related products shows that enforcing e-commerce rules on online platforms, some of which are not based in the EU, is difficult.</p> <p>(see Gustavsson et al. (2023): Study to support the assessment of impacts associated with the general review of Directive 2011/65/EU (RoHS Directive), Final report; https://op.europa.eu/en/publication-detail/-/publication/b9188764-f465-11ed-a05c-01aa75ed71a1/language-en/format-PDF/source-308936591).</p> <p>Additionally, you asked “5. Where can we find the price of water used at industrial scale for producing countries?”</p>	<p>Online sales</p> <p>Clarifications needed from the stakeholder</p> <p>The authors invite the stakeholder to provide data and references about online purchase of textile apparel. The authors would be eager to include more information in the market analysis.</p> <p>Question 5</p> <p>Clarified</p> <p>The PS is investigating the different legislative frameworks and costs in the main producing countries. This analysis reflects also differences about resource use, such as water. The</p>

ID	Stated section; stated line	Comment	Answer
		<p>We are concerned about the question on the price for water at industrial scale for producing countries. Water prices cannot be compared without a detailed analysis of the pricing framework that depends on e.g. treatment of water resources and its services, and property rights, distribution and also environmental requirements. These needs to be reflected especially in the textile producing countries.</p> <p>To your question: “4. Can you share a detailed taxonomy of chemicals used in the apparel textile sector with corresponding market data?” we can provide following answer:</p> <p>Additional information on chemicals used are available in Annex 8 of the TXT BREF.</p> <p>Instead of focusing on market data for the use of chemicals we would propose focusing on the use of hazardous chemicals and chemicals with a negative impact on recyclability and for which purpose these chemicals are used. The TXT BREF is a useful source for this type of information.</p>	<p>question asked during the online meeting tries to investigate these aspects. The section 5.7 and next analysis performed especially in Task 5 will investigate the differences between producing countries in terms of costs and environmental performances.</p> <p>Question 4 Acknowledged</p>
464	Section 5.5. Market analysis; 1034 - 1142	<p>Overall, the references mentioned in the market analysis are pretty few in the preparatory study, literature studies are especially missing and some data are based on an open data base (i.e. non verified data).</p> <ul style="list-style-type: none"> - To ensure that the market analysis as accurate, it is important to not rely on one single source/ always the same source as they represent a certain expertise or angle. - The economic aspects are quite detailed both globally and at the European level, however mostly representing manufacturers’ points of view. The market analysis would benefit from being complemented with additional data covering the entire downstream value chain i.e. covering retailers, brands, and online marketplaces. 	<p>Acknowledged</p> <p>The authors invite the stakeholder to provide references about the additional type of data and sources that could improve the study. The authors would be eager to implement the current analysis.</p>
465	5; Line 1034 to 1142 Line 1235 to 1321	<ul style="list-style-type: none"> - Literature studies are especially missing and some data are based on an open data base (i.e. non verified data). - To ensure that the market analysis is accurate, it is important to not rely on one single source/ always the same source as they represent a certain expertise or angle. The economic aspects are quite detailed both globally and at the European level, however mostly representing manufacturers’ points of view. The market analysis would benefit from being 	<p>Acknowledged and Clarified</p> <p>The authors invite the stakeholder to provide references about the additional data, types of data and sources that could improve the study. The authors would be eager to implement the current analysis.</p>

ID	Stated section; stated line	Comment	Answer
		<p>complemented with additional data covering the entire downstream value chain i.e. covering retailers, brands, and online marketplaces.</p> <ul style="list-style-type: none"> - Addition to the characteristics of the value chain (Section 5.6, line 1482 to 1532): The textile industry presents one of the largest sectors in the world, characterised by continuous economic growth and highly competitive structures. It is important to take into account the global character of the textile value chain where the different stages and tiers take place across an array of different locations. The textiles market is very fragmented, as no brand or retailer owns more than 2% of the market value. It is also important that the textile and clothing industry has become a key sector of the economy in many developing countries, with some 60 to 75 million people employed across the supply chain, 80% of whom are women. It also plays a major role in the economy of many Asian countries. In Bangladesh and Cambodia for example, it generates around 80 per cent of all export earnings, in Pakistan over 50 per cent, and is also one of the key contributors to the GDP. <p>When introducing the specific requirements for the textile industry, it is essential to take this global character into account, notably when it comes to energy requirements, recycling technologies and their location, the collection of waste, the fiber availability, and the need for targeted and specific R&D coupled with continuous engagement and dialogue with producing countries and all actors in the value chain, notably fabric and garment manufacturers.</p> <p>We've noted in particular some areas where information is missing/ should be more accurate:</p> <ul style="list-style-type: none"> - The report should provide a clearer picture on the volumes sold in shops and the volumes sold online and the origin of those. As the future delegated act is regulating products entering the EU single market with the objective to apply the same eco-design requirements independently from where the products are coming from, the JRC study must provide accurate data on the volume of items that are put on the market via online platforms from third countries, in particular China. This is an important gap at the moment and this must be addressed before exploring policy scenarios and options for the delegated act. - The number of textile recycling plants classified by location (Figure 11) and the Scale of current textile recycling plants (Figure 13) provide data based on an open platform i.e. not verified data or data missing (e.g. Table 57). The JRC should further verify actual capacity. 	<p>About the analysis of recycling plants, the PS reports information of the open access and unverified database, but the PS at lines 1313-1315 reports the estimated capacity based on Huygens et al. (2023).</p> <p>The analysis about product aspects, such as recycled content, will be addressed in Tasks 4, 5 and 6. This section gathers only information about market data.</p> <p>Fragmentation of textiles will be addressed in Task 5. The authors think that market analysis is not the suitable section to address this topic.</p>

ID	Stated section; stated line	Comment	Answer
		<p>- Availability of recycled content vs recycled material: To be able to define recycled content requirements, in addition to the recycling capacity, the actual amount of recycled fiber available and the commercial viability of the products with recycled content need to be considered (line 1281 to 1320). We need more solid study on the progression of recycled content and data that are verified.</p> <p>- Limits to global projections per fibers (Figure 10 and table 16) not reflecting the potential of an increase in recycled content.</p> <p>- Limits to approach on microfibers (table 14): Loss of fragmented fibers can also occur in relation to natural fibers, which can contain harmful substances and cause harm, not only with microplastics. Natural fibers are very often enhanced with persistent chemical additives, and therefore there is a need for sound scientific assessment on the toxicity of these additives, and on how they hinder the natural fiber degradation. Any potential requirements must therefore address fiber fragmentation from both synthetic and natural fibers. We also recommend referring to the research conducted by the Microfibre Consortium (TMC) – a science-based global industry alliance which has committed to clarifying and eliminating the problem of fibre shedding by 2030.</p> <p>- Data on innovation (line 1138 to line 1142) are limited and underestimate the innovative dimension of the European textile industry, especially when it comes to novel fibers.</p> <p>- Lifespan (Section 5.8): We welcome the approach taken in the draft preparatory study regarding non-physical durability. It plays a role in the longevity of the textile industry.</p> <p>https://fashionforgood.com/wp-content/uploads/2019/10/FashionForGood_Investing-in-Textile-Innovation_October.pdf; https://www.giz.de/en/worldwide/86435.html; https://www.giz.de/en/downloads/giz2021-en-promoting-sustainability-textile-industry.pdf</p>	
466	5; 1034	<p>EURATEX provides latest industry data with the 2024 EURATEX facts and figures accessible here:</p> <p>EURATEX Facts & Key Figures 2024 (euratex.eu/wp-content/uploads/EURATEX-Facts-Key-Figures-2024.pdf)</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
467	Market analysis; Global partners	<p>- Here is a link to the legislation for pollution prevention and control in textile industry in Turkey: https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=15572&MevzuatTur=9&MevzuatTertip=5</p> <p>- On the system, I can see at least 62 regulations that inform textile industry but not all sustainability related to textiles but most relate to import/export activities or other matters. So, this above appears as the integrated pollution prevention and control related.</p> <p>- The ministry of environment has also got a guidance document: https://webdosya.csb.gov.tr/db/cygm/eduardosya/Tekstil_ve_Hazir_Giyim_Sektoru_Kilavuzu.pdf - this is a specific guidance document for 'waste and waste management in textile industry'.</p> <p>- There is also an academic study on integrated pollution control – not sure if relevant, but I am still attaching here: https://www.sciencedirect.com/science/article/pii/S0959652614004211 /</p>	Acknowledged
468	5; 1034	General comment on the statistics in the market analysis section: it is critical to note that when it comes to statistics on imports of goods, it is challenging to get a correct picture of the reality. For instance, a t-shirt always has the same HS code regardless of whether it costs 1 euro or 500 euros. Therefore, it is challenging to discuss outsourcing and how it affects the industry in Europe. This is because in the statistics the products look the same, but in reality they are completely different products.	Acknowledged
469	5; 1034	Section 5 regrettably does not include an analysis of the whole market of the products included in the scope of the study. The post-consumer sectors, such as sorting and recycling, are not covered by the analysis. Defining ecodesign requirements, nonetheless, requires an understanding of the specificities of these market segments, as they play a fundamental role in closing the loop for apparel textiles. [...] highlights the importance of mapping tools to empower sorting facilities to recognise ecodesigned garments, by leveraging the Digital Products Passport (DPP) and in alignment with the revised Textiles Labelling Regulation (TLR). Sorters require incentives to prepare garments for repairing and recycling through concrete sorting steps. Both sorters and policymakers must understand the requirements of recycling processes and their respective tolerance, for instance by discouraging or banning blend garments that cannot be recycled in the coming 10 years. Resortecs suggests that an analysis of post-consumer sectors, such as sorting and recycling, is included under Section 5.5 of the preparatory study.	<p>Acknowledged</p> <p>The authors invite the stakeholder to provide references about the additional data, types of data and sources that could improve the study. The authors would be eager to implement the current analysis.</p> <p>Analysis of product aspects, such as recycled content and recyclability, will be addressed in Task 4, 5 and 6.</p>

ID	Stated section; stated line	Comment	Answer
470	5; 1034	<p>"We do have end-of-life figures: https://www.rijksoverheid.nl/documenten/rapporten/2023/06/26/bijlage-3-monitoringrapportage-beleidsprogramma-circulair-textiel-2021.</p> <p>https://www.rijksoverheid.nl/documenten/rapporten/2020/04/14/rapport-massabalans-textiel-2018-2020.</p> <p>https://www.rijksoverheid.nl/documenten/rapporten/2022/10/06/bijlage-bij-kamerbrief-rapport-massabalans-bedrijfsmatig-textiel-2020-ffact "</p>	Acknowledged
471	5.1; 1059-1061	Please provide more indepth to why quotas was removed and what environmental implications that was foreseen due to the removal	<p>Clarifications needed from the stakeholder</p> <p>This section gathers data about the market. Political reasons behind the choice of WTO agreements are out of the scope of this section. Environmental analysis of the current and future projection will be performed in Task 5 and 6.</p> <p>The authors invite the stakeholder to provide arguments to support the investigation of these topics in this or other sections of the PS. The stakeholder will have the possibility to submit ther position in the next consultation.</p>
472	5.1; 1062	How did the fact that different countries have very different levels of environmental regulation in place, influence the removal of quotas?	<p>Clarifications needed from the stakeholder</p> <p>The environmental legal framework of producing countries is addressed in section 5.7 and the future Tasks 5 and 6 of the PS. The authors do not understand how the answer to</p>

ID	Stated section; stated line	Comment	Answer
			this question can improve the market analysis. The authors invite the stakeholder to provide clear position and arguments to improve the current analysis. The stakeholder will have the possibility to submit their position in the next consultation.
473	5.1; 1086	Please provide more explanation to why energy prices are lower in producing countries.	<p>Clarifications needed from the stakeholder</p> <p>The authors do not understand how the answer to this question can improve the market analysis. The authors invite the stakeholder to provide clear point and references to improve the current analysis. The stakeholder will have the possibility to submit their position in the next consultation.</p>
474	5.1; 1091	It would be interesting to combine table 10 with the amounts put on market and the amount of textile waste.	Acknowledged
475	5; 1108	In table 11 it is unclear what is meant by market relevance. Is market relevance the same as turnover? How do the figures concerning apparel turnover for 2019 relate to the figures mentioned in table 3?	<p>Partly accepted</p> <p>The title of the Table 11 was changed. It is difficult to relate data reported in Table 3 and Table 11, because the economic parameters are different. The authors invite the stakeholder to share specific insights that would help the improvement of the analysis. The stakeholder will be able to submit clarifications in the next consultation.</p>
476	5; 1113	Why are values in USD and not like in table 11 in EUR? Please use EUR	<p>Accepted</p> <p>The values were expressed in EUR.</p>
477	5; 1113	In table 12, how do the figures for import and export for the EU relate to the figures for import and export from table 3, which are different.	<p>Clarifications from the stakeholder needed</p> <p>The authors do not understand how the answer to the stakeholder's question can improve the analysis.</p> <p>Table 12 aims to describe the main countries exporting and importing apparel at global scale,</p>

ID	Stated section; stated line	Comment	Answer
			<p>while Table 3 aims to quantify the market size of several textile product subgroups. The source of data are different in the two tables, as it is different the way of classifying and counting product import and export.</p> <p>The authors invite the stakeholder to share specific insights that would help the improvement of the analysis. The stakeholder will be able to submit clarifications in the next consultation.</p>
478	5.1; 1116	As with the previous comment, figure 3 implies that all fibre production is included but only includes a picture of a cotton boll. Given the importance of polyester in apparel, better resolution between fibre types would be desirable to use in these types of charts, and suggest. Further, suggest not using a cotton boll unless only cotton is being specifically discussed	<p>Rejected</p> <p>This is a Figure developed by UNED. The cotton boll is used in the pictogram because it is the most used fibre in textile apparel.</p>
479	5.1; 1116	In order to complete the geographical breakdown of global apparel production and consumption, data about the end-of-life phase of textiles should be added, in terms of collecting / sorting shares and where landfilling and recycling are taking place	<p>Acknowledged</p> <p>This would be very helpful. The authors do not have access to studies reporting such information. The stakeholder is invited to provide references that could improve the knowledge on this topic. The stakeholder will be able to submit clarifications in the next consultation.</p> <p>The text was updated with information regarding export of used textiles to third countries.</p>
480	Figure 3; N/A	We would suggest that you also add pulp production as step	<p>Acknowledged</p> <p>As reported in the description of the Figure, this is developed by UNEP. The authors would be eager to implement this information with more text. The authors invite the stakeholder to submit data and references at global scale about pulp production in the next consultation.</p>

ID	Stated section; stated line	Comment	Answer
481	5.1; 1116	Please update figure 3 with geographical breakdown of end of life as well. It is important to be transparent regarding the waste flow.	<p>Acknowledged</p> <p>This would be very helpful. The authors do not have access to studies reporting such information. The stakeholder is invited to provide references that could improve the knowledge on this topic. The stakeholder will be able to submit clarifications in the next consultation.</p> <p>The text was updated with information regarding export of used textiles to third countries.</p>
482	5.1; 1125	We welcome the JRC describing the global supply chain & interlinked industries in this preparatory study. This is of outmost importance especially when developing meaningful policies, taking into consideration the impact on our main trading partners and suppliers outside the EU jurisdiction.	<p>Acknowledged</p>
483	5.1; 1126-1136	<p>Trade with/ export of used textiles/ textile waste is not mentioned, but important to consider. E.g. exports of used textiles to Ghana or Pakistan.</p> <p>In 2019, 46% of EU textiles went to African countries, with 41% going to Asia (EEA, EU exports of used textiles in Europe's circular economy — European Environment Agency (europa.eu), https://www.eea.europa.eu/publications/eu-exports-of-used-textiles/eu-exports-of-used-textiles). The total share of textile waste originating from the EU that is eventually sent to Africa is assumed to be significantly higher if it includes non-EU volumes. This is because further sorting facilities in Pakistan and the UAE are contracted by businesses or charities in the EU to conduct sorting activities, which are labour intensive, at lower costs, before re-exporting to, for example, African countries (Destinations of Dutch used textiles Report Government.nl, https://www.government.nl/documents/reports/2024/02/02/destinations-of-dutch-used-textiles)</p>	<p>Accepted</p> <p>The section was implemented.</p>
484	5.1; 1135	Misleading wording. Customers = Importing countries? What is actually displayed in the Table?	<p>Clarification needed from the stakeholder</p> <p>The line reported by the stakeholder does not corresponds to ant table. The stakeholder is invited to clarify their comment in the next consultation.</p>

ID	Stated section; stated line	Comment	Answer
485	5; 1138	Very vague paragraph on innovation. What do you mean to say? How do industrial designs and patents relate to ecodesign?	<p>Clarified</p> <p>This section describes the market. In this paragraph, the authors report some figures about the innovation in the sector.</p>
486	5.1 page 41; 1139-1142	<p>Positioning the European textile industry as a global innovation leader might be too bold a statement given the reality of the textile know-how available on the EU territory. This competence is becoming less and less because the textile industry is being relocated to Asian countries almost exclusively for profit reasons at the expense of the environment and people. Innovation is not just the sum of patents. For such a statement, you also need to consider the following categories: scientific and technical journal articles, trademark applications, high technology exports, research and development expenditures, researchers in research and development, technicians in research and development, etc.</p> <p>For example, in the Textile Research Journal, the most impactful scientific journal in the textile field, the vast majority of scientific articles in the past years were submitted by researchers from China and Hong Kong.</p>	<p>Acknowledged</p> <p>The author is invited to provide data and specific references that would improve the text.</p>
487	Section 5.2; 1143-1208	<p>It is unclear whether the calculation of the figures on imports takes into consideration the parcels that are directly shipped by economic operators established outside of the EU to consumers based in the EU. These parcels may have a value lower of EUR 150 and therefore import duties are not due. Until 1 July 2021, postal consignments not exceeding a value of EUR 150 could have even been declared for free circulation without a formal customs declaration. This is a business model that is more and more used in the textile sector and could significantly impact the calculation of apparent consumption.</p> <p>Moreover, it is important to note that production, import, export and apparent consumption are calculated in weight and value, not in numbers. Having a clear understanding of numbers of clothes purchased is important when evaluating apparent consumption and consumer behaviour. Nonetheless, it is not possible to deduct volume in numbers either from mass or from value, since neither the weight of single products nor the prices have remained constant. Prices have lowered to the increased availability of cheap polyester (Niinimäki et al. The environmental price of fast fashion, Nature Reviews Earth & Environment, 2020 Volume 1, Issue 4).</p>	<p>Acknowledged</p> <p>The authors invite the stakeholder to provide a dataset that would allow to support the investigation they propose. The authors used data reported in PRODCOM with characteristics described in section 9.1.</p>

ID	Stated section; stated line	Comment	Answer
		<p>Art. 31 of the proposed ESPR compromise enables the Commission to request companies that put products covered by ecodesign requirements on the market to disclose quantities. We strongly encourage the Commission to request such information and to make it publicly available.</p>	
488	Section 5.2; 1143-1208	<p>It is unclear whether the calculation of the figures on imports takes into consideration the parcels that are directly shipped by economic operators established outside of the EU to consumers based in the EU. These parcels may have a value lower of EUR 150 and therefore import duties are not due. Until 1 July 2021, postal consignments not exceeding a value of EUR 150 could have even been declared for free circulation without a formal customs declaration. This is a business model that is more and more used in the textile sector and could significantly impact the calculation of apparent consumption.</p> <p>Moreover, it is important to note that production, import, export and apparent consumption are calculated in weight and value, not in numbers. Having a clear understanding of numbers of clothes purchased is important when evaluating apparent consumption and consumer behaviour. Nonetheless, it is not possible to deduct volume in numbers either from mass or from value, since neither the weight of single products nor the prices have remained constant. Prices have lowered to the increased availability of cheap polyester (Niinimäki et al. The environmental price of fast fashion, Nature Reviews Earth & Environment, 2020 Volume 1, Issue 4).</p> <p>Art. 31 of the proposed ESPR compromise enables the Commission to request companies that put products covered by ecodesign requirements on the market to disclose quantities. We strongly encourage the Commission to request such information and to make it publicly available.</p>	<p>Acknowledged</p> <p>The authors invite the stakeholder to provide a dataset that would allow to support the investigation they propose. The authors used data reported in PRODCOM with characteristics described in section 9.1.</p>
489	5.2; 1143	<p>1. Do you agree with the current interpretation of the relationship between the reported historical events and the evolution over the time of the market indicators?</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
		Please developed this section more in order to analyse och explain the reason to the increas in the amunt of textiles put om EU market	The authors invite the stakeholder to provide their additional interpretation and references.
490	5.2; 1144	Our federation calls for further economical analysis on European production with strong risk management, which benefits from lower carbon footprint due to its energy mix and better social conditions.	Acknowledged The authors invite the stakeholder to provide references about studies addressing the topic suggested. The PS will develop and environmental and economic assessment in Task 5.
491	5.2; Question Do you agree with the current interpretation of the relationship between the reported historical events and the evolution over time of the market indicators?	The appearance of fast fashion with the start of 21th century is suggested to be included. Additionally, the shifts of manufacturing center and supply chains should be shown in a different table.	Acknowledged The authors invite the stakeholder to provide the definition of “fast fashion” and data and references supporting what they suggest.
492	5; 1179-1188	We need a quota of ALL textile products to Europe again as we had before 2005. That will really chang and influence for the better the climate change. An increase of 86% in mass in a period of 14 years time! while the value increases only with 27%. Why dumping all these new clothes in Europe!!	Acknowledged
493	5.2 The EU market (Import); 1182-1187	The current state of knowledge indicates that this is the core challenge to reduce the environmental impact of the sector, therefore, we suggest tackling production volumes, including internet sales and falling prices directly, rather than relying on indirect measures such as promoting longer lifetimes or reuse. This is also supported by new research showing that the number of garments that are acquired has the most impact on the lifetimes of clothing (Laitala, Klepp, & Løvbak Berg, 2024). Measuring can also predict which clothes and	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>textiles go out of us, and after how long use, through waste audits, wardrobe studies and a new method we have developed, that lies somewhere in between these, which we have called “Waste audit interviews” (Laitala & Klepp 2024, Laitala, Klepp & Løvbak Berg 2024, Klepp 2023).</p> <p>From this perspective, identifying accurate KPIs and monitoring methods is key for this regulation and we do not see a discussion about this advancing. The JRC has a key role in making sure that monitoring methods are in line with current existing and lack of knowledge. The effect of durability, reuse, and repair measures should be monitored through the volumes of new products produced and imported to Europe. This will allow to test areas where knowledge is lacking, such as the effect of increased reuse and durability on production volumes.</p> <p>References:</p> <p>Laitala, K. & Klepp, I.G. (2024). Waste audit interviews - A method for understanding the link between intrinsic quality and apparel lifespans. Consumption Research Norway (SIFO), Oslo Metropolitan University. https://clothingresearch.oslomet.no/wpcontent/uploads/sites/1026/2024/04/NewMethod.pdf</p> <p>Laitala, K., Klepp, I. G., & Løvbak Berg, L. (2024). The impact of modes of acquisition on clothing lifetimes. In K. Niinimäki (Ed.), <i>Recycling and Lifetime Management in the Textile and Fashion Sector</i> (pp. 91-111). Boca Raton: CRC Press.</p> <p>Klepp, I. G. (2023). Status for developing methods for using waste as a resource for knowledge about the use phase of clothing, September 2023, SIFO, https://clothingresearch.oslomet.no/status-usingwaste-as-resource-for-knowledge-about-the-use-phase-of-clothing/</p>	

ID	Stated section; stated line	Comment	Answer
494	<p>5.2 The EU market; 1186-1187: “For the majority of the product categories, the increase in mass is very much larger than the increase in value”, and 1190-1192: “From 1996 to 2022, the value-to-mass ratio of export, production and import always had the highest, middle and lowest value each year, respectively. Before 2000, the gap among these market indicators was limited, but after 2002 the</p>	<p>We would like to provide an additional explanation of why the gap progressively increased on the value-to-mass ratio after 2002. The reason why the value of imported garments decreased while the mass increased is the increased availability of cheap polyester clothing. This becomes visible by looking at Figure 10 in line 1252 and especially in the attached graph below showing world fibre production over time (Niinimäki et al, 2020). Up until approx. 1997 world fibre production increased in parallel with the population growth (which is logical). But after 1997 polyester production increased exponentially compared to the world population. It is clear from Niinimäki et al. that the increasing availability of cheap polyester clothing after 1997 was the primary enabler of fast fashion.</p> <p>With currently proposed PEF methodology significantly overweighting the influence of physical durability testing in estimating garment lifetime, its use in ESPR would actually encourage increased use of polyester clothing (due to the strong tensile strength characteristics of polyester), even though the evidence is clear that polyester clothing has actually contributed to shorter clothing lifetime (i.e. fast fashion).</p> <p>Further research confirmed that the volume of acquired garments also impacts the lifetime of clothing both in terms of years and number of wears.</p> <p>Resource: Niinimäki et al. The environmental price of fast fashion, Nature Reviews Earth & Environment, 2020 Volume 1, Issue 4</p> <p>Laitala, K., Klepp, I. G., & Løvbak Berg, L. (2024). The impact of modes of acquisition on clothing lifetimes. In K. Niinimäki (Ed.), <i>Recycling and Lifetime Management in the Textile and Fashion Sector</i> (pp. 91-111). CRC Press. https://doi.org/10.1201/9781003044413-8</p> <p>Laitala, K.; Klepp, I.G. What Affects Garment Lifespans? International Clothing Practices Based on a Wardrobe Survey in China, Germany, Japan, the UK, and the USA. <i>Sustainability</i> 2020, 12, 9151. https://doi.org/10.3390/su12219151</p>	<p>Clarifications required from the stakeholder</p> <p>The authors understand the interpretation suggested by the stakeholder, but more information/data is/are needed. The PRODCOM data refer to apparel, while Figure 10 and the Figure in Niinimäki et al. (2020) report the fibre production for generic application in textile products. In order to include the explanation proposed by the stakeholder, the authors need data and information about the composition of apparel textile over the years and the evolution of production price of polyester and other fibres over the years.</p>

ID	Stated section; stated line	Comment	Answer
	gap progressively increased.”	Please see our response submitted by email to view the graph that goes along with this comment.	
495	5.2 The EU Market; 1200 (1151-1197)	<p>With reference to the graphic shown on the 1st day of consultation “Market Indicators for Apparel Textiles in EU-27” (slide 28), we would like to draw the attention to the fundamental market shift in 2004/05 when low cost options mainly from Asia have accelerated the outsourcing process. It might be worthwhile to analyse if the industrial shift to circularity might cause a similar, but reverse effect in a very short time period as raw material availability in the EU market might drastically change the logistic flows and with this the general industrial cost structure.</p> <p>As such, circularity might have a fundamentally positive effect on the EU economy as a whole.</p>	Acknowledged
496	5.2; Question In the last years, the apparent consumption of most of the apparel textile categories increased. Can you explain the	The difference shows the regulatory nature and non-market feature of setting quotas. Quotas are not naturally established levels depending on assumed consumer preferences rather than the real market conditions.	<p>Clarifications needed from the stakeholder</p> <p>The authors do not understand the proposal from the stakeholder. The authors invite the stakeholder to reformulate it in the next consultation.</p>

ID	Stated section; stated line	Comment	Answer
	different trend of the categories 7 and 8 in Table 13?		
497	5.2; 1205 table 13 3276 table 42	<p>The perspective should be here that product number 7 and 8 behave as we should to mitigate the climate problems. We have to ask ourselves why this dramatic increase of product numbers 1, 2,3,4,5,6,9 and 10??</p> <p>In Europe we can see around us that UN Human rights Article 25 (Right to Clothing) in general is addressed well. We do not need 133% more t-shirts.</p> <p>Overproduction of textile products is the elephant in the room. All these new products are entering Europe.</p> <p>Garment and textiles made somewhere, where it is not proven that the eco AND social circumstances are well and are the system not continue monitored. Produce less then the monitoring is more easy.</p> <p>Let us call it ECO-SOC label instead of ECOLabel. The ECO-SOC label ensures that the 9 points of the OECD are covered too in that specific produced product.</p> <p>The ESPR cannot developed separate from the CSDDD..Both should be covered in one product label.</p> <p>Why putting an ECOLabeled product on the market when I am not ensured that all workers in the value chain are paid at LEAST the minumum wage of the country they live in (including day workers; piece workers; and outsourced work)</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
498	5.3; 1209-1215	<p>As slightly hinted in the draft chapters, one of the key elements in the entire matrix for the setting of the ecodesign requirements passes by enforcement Enforcement of the Regulation and market surveillance authorities will play a key role in ensuring the effective implementation of the eco-design requirements. These requirements should be based on objective, quantifiable, scientific data and scientific evidence that would provide clarity to economic operators but also facilitate and ensure proper enforcement. Additionally, effective enforcement ensures a level playing field for all EU Single Market actors and vis-à-vis players outside the EU, and bolsters consumer confidence in sustainable products .</p> <p>In this respect, we recommend that compliance with the requirements introduced in the Delegated Acts for textiles should be based on a risk-based approach, similar to the approach introduced in the context of the REACH Regulation or the General Product Safety Regulation. It is essential to note that it is neither commercially nor effectively possible to test all products that are placed on the European market, not to mention the resources that this would entail for national authorities. Harmonised and coordinated enforcement is key to help ensure a level playing field for all companies selling textile products in the EU Single Market.</p>	Acknowledged
499	5.4; 1235	<p>6. Do you have any suggestion and data to improve the market analysis of fibres, chemicals, energy and water?</p> <p>I recommend Textile Exchange Preferred fibres and materials https://textileexchange.org/knowledge-center/reports/materials-market-report-2022/ About chemicals: https://chemsec.org/see-through-and-interwoven-hm-och-ikeas-textile-study-shows-transparency-and-collaboration-are-key-to-circularity/</p>	Acknowledged
500	section 5. Market analysis; 1239-1321 1344-1374	<p>The number taken from Textile Exchange report overall global and fiber production, beyond apparel only. The share of material is not representative of the apparel industry. Please refer to our annual report</p> <p>-Availability of recycled content vs availability of recycled material: In addition, in order to be able to define recycled content requirements, in addition to the recycling capacity, the actual amount of recycled fiber available and the commercial viability of the products with recycled content need to be considered (line 1281 to 1320).</p>	<p>Acknowledged and Clarified</p> <p>The authors invite the stakeholder to provide references about the additional data, types of data and sources that could improve the study. The authors would be eager to implement the current analysis.</p> <p>About the analysis of recycling plants, the PS reports information of the open access and</p>

ID	Stated section; stated line	Comment	Answer
		<p>-Limits to global projections per fibers (Figure 10 and table 16): the global projection of fibers do not reflect the potential of an increase in recycled content</p> <p>-Limits to approach on microfibers (table 14): Loss of fragmented fibres can also occur in relation to natural fibres, which can contain harmful substances and cause harm, not only with microplastics .Natural fibres are very often enhanced with persistent chemical additives, and therefore there is need for sound scientific assessment on the toxicity of these additives, and on how they hinder the natural fibre degradation. Any potential requirements must therefore address fiber fragmentation from both synthetic and natural fibres. We also recommend referring to the research conducted by the Microfibre Consortium (TMC) – a science-based global industry alliance which has committed to clarifying and eliminating the problem of fibre shedding by 2030.</p> <p>- The estimation of recycling capacities relies on open-source data that does not seem to be peer-reviewed not verified. Besides, is the Renewcells capacity included in these numbers. If so, have you assessed how this will impact the numbers the current EU recycling capacity and the projection for 2030-2035?</p> <p>on energy</p> <p>We advocate for some flexibility for reporting energy mix and consumption from supplying countries. Our supply countries are diversified and evolves, it would be unwise to rely on one “typical” country only such as China or Turkey. For instance, the IEA report that gas account for the majority of the Bangladesh’s electricity production, which impacts the products’ footprint.</p>	<p>unverified database, but the PS at lines 1313-1315 reports the estimated capacity based on Huygens et al. (2023).</p> <p>The analysis about product aspects, such as recycled content, will be addressed in Tasks 4, 5 and 6. This section gathers only information about market data.</p> <p>Fragmentation of textiles will be addressed in Task 5. The authors think that market analysis is not the suitable section to address this topic.</p>

8.2 Comments from ID 501 to ID 600

Table 10. Comments on section 5 – Market analysis. From ID 500 to ID 600

ID	Stated section; stated line	Comment	Answer
501	5.4.1 Fibres; 1239	<p>Consideration of Renewability as Ecodesign Requirement and product parameter:</p> <p>The agreement found on the Ecodesign for Sustainable Products Regulation (ESPR) mentions in Annex I the following product parameter: (ha) use or content of sustainable renewable materials. With this addition, policy makers recognised the potential of biobased industries.</p> <p>The product portfolio of our biobased industries continues to grow, with products such as biobased batteries and adhesives, showcasing that anything that can be made from fossil fuels can also be obtained using wood. To support the further development of the biobased industries it is important to formally acknowledge the potential biobased products have to reach the climate neutrality targets and, whenever possible, to incentivise the uptake of ‘renewable products’, where ‘renewability’ means the ability for a natural resource to replenish and recover over time and thereby is infinite when growth is greater than consumption that come from sustainably managed sources rather than those made from finite/fossil-based resources.</p> <p>Hence, we urge to consider the uptake of renewability as ecodesign requirement and product parameter in the delegated acts of the different product groups under the ESPR.</p> <p>No material can be reused/recycled forever. Losses and degradation always take place, and thus new virgin material is always needed in the loops. Virgin renewable raw materials can be supplied to loops according to principles of circular economy (CE), in a regenerative way. On the opposite, virgin mineral and fossil raw materials cannot be supplied to loops according to CE principles.</p> <p>‘Renewable content’ and ‘recycled content’ are both circular inputs and should both be promoted. In the case of products made from wood fibres these should be considered as renewable as they are made from fibres that come from sustainably managed forests, as defined by Forest Europe and certified by internationally recognized schemes such as PEFC and FSC. Europe should finally tap into the full potential of forests, forest-based products and sustainable forest management practices to reduce its dependence on fossil materials. By including considerations about the renewability of the raw materials used to manufacture products among the essential requirements that could be set in the upcoming delegated acts, the Commission has the opportunity to support the development of the biobased industries, and recognize the substitution potential of biobased products.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
502	5.4.1 Fibres; 1239	<p>There is a huge untapped potential within the European textile industry to foster sustainable economic growth, to improve the competitiveness of our industries and to build more resilient supply chains. We believe that the European pulp and paper industry has the capability to be part of the solution. Cepi believes this objective can be achieved by relying on, where possible, the sustainable and European sourcing of renewable raw materials and the deployment of innovative, cleaner European technologies that will contribute to a more circular economy.</p> <p>To ensure that the textile industry becomes more circular and less energy intensive, it is important to follow a holistic approach that will consider the necessary steps along the entire value chain. As the choice of the fibres and the product's design not only define the textile product properties and performance, but also determines the environmental impact of the resulting product, we believe the European Commission should take measures to ensure renewable material inputs are the starting point of a more sustainable and circular European textiles industry.</p> <p>Wood-based cellulose fibres are already commercially available, having the same level of malleability as synthetic fibres, while retaining the comfort typical for natural fibres. This kind of fibres should be promptly promoted as a highly sustainable alternative. By incentivising the uptake of wood-based cellulose fibres, Europe could significantly decrease its dependence on imported raw materials and reduce GHG emissions, arising both from the transport and the manufacturing of textiles in extra-EU countries. In Europe, the sourcing of forest biomass is framed by both European and national legislations, as well as market-based certification systems, which ensure the product is not contributing to deforestation or biodiversity loss, but rather to sustainable forest management, increasing the abilities of our forests to act as carbon sinks.</p> <p>Additionally, the uptake of wood-based cellulose fibres can also deliver on other important environmental objectives, such as the need to control and prevent pollution. Wood-based cellulose fibres are 100% renewable, recyclable and biodegradable. They also have a low water footprint during the growth phase and do not lead to soil depletion but are rather capable of reversing soil degradation and erosion. The European pulp and paper industry is a key player in the transition towards a more circular economic model and is committed to retaining the value of the materials used in the loop for as long as possible. This effort can also be recognised in the different solutions our industry has developed to improve the circularity performance within the textiles industry.</p> <p>Considering the holistic approach needed to increase the overall sustainability of the textiles industry, we would like to recall the Commission on the importance of increasing the recycling rates for textiles in Europe. In order to do so it is necessary to invest in the necessary infrastructure for the sorting, collection and recycling of textiles.</p>	Acknowledged
503	5.4.1 Fibres; 1239	<p>Datas on branded fibers such as Tencel, lyocel, q-nova, refibra, etc. must be shared publically or at least to a third party. Brands are encouraged to use alternative fibers but without informations on them, brands won't be able to have the traceability and score of their product.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
504	5.4.1. Fibres; 1239	<p>Consideration of renewability as ecodesign criteria and product parameter for textiles</p> <p>To genuinely consider the sustainability of the textiles and textile systems, a comprehensive life-cycle approach should be considered as part of the ecodesign for sustainable products regulation. This means considering the value chain starting from the raw materials until the use phase of the textiles.</p> <p>The ESPR agreement mentions in Annex I) the following product parameter: (ha) use or content of sustainable renewable materials. With this addition, policymakers recognised the potential of biobased industries. By including considerations about the renewability of the raw materials used to manufacture products among the essential requirements that could be set in the upcoming delegated acts, the Commission can recognize the substitution potential of biobased products.</p> <p>As the possibility of recycling and recycled content is already considered in the ecodesign requirements of the ESPR agreement, similarly the renewability of the raw materials should be acknowledged. Renewable raw materials are recognised as circular input by World Business Council for Sustainable Development and its circular transition indicators 1). European product policies should do the same. No material circulates forever as degradation and losses always happen and therefore new virgin material is needed in the loops. Wood as a virgin renewable raw material can be supplied to loops according to the principles of circular economy. Besides, there is still a lot of development and investments needed concerning the necessary infrastructure and availability of recycled fibres in Europe.</p> <p>As different raw materials suit best for different applications, there should be room to select case specifically the best combination of renewable and recycled raw materials to minimise the environmental footprint. No matter what kind of raw material is used, it should have a sustainable origin approved by sustainability certificates and transparent product information. By utilising wood fibres originating from sustainably managed forests, as defined by Forest Europe and certified by internationally recognized schemes such as PEFC and FSC, Europe can reduce its dependence on fossil materials. As there exists no standard able to recognise the difference between the virgin and recycled origin, the verification methods (researched in the next milestone) should also consider the renewable, sustainable, content similarly as ISCC Plus certification recognises both biobased and recycled content: https://www.scsglobalservices.com/services/iscc-plus-certification</p>	Acknowledged


ID	Stated section; stated line	Comment	Answer
		1) World Business Council for Sustainable Development: https://www.wbcsd.org/Programs/Circular-Economy/Metrics-Measurement/Resources/Circular-Transition-Indicators-v4.0-Metrics-for-business-by-business	
505	5.4.1. Fibres; 1239	<p>To ensure that the textile industry becomes more circular and less energy intensive, it is important to follow a holistic approach that will consider the necessary steps along the entire value chain. As the choice of the fibres and the product's design not only define the textile product properties and performance, but also determines the environmental impact of the resulting product, we believe the European Commission should take measures to ensure renewable material inputs are the starting point of a more sustainable and circular European textiles industry.</p> <p>Wood-based fibres are already commercially available, having the same level of malleability as synthetic fibres, while retaining the comfort typical for natural fibres. This kind of fibres should be promptly promoted as a highly sustainable alternative. By incentivising the uptake of wood-based fibres, Europe could significantly decrease its dependence on imported raw materials and reduce GHG emissions, arising both from the transport and the manufacturing of textiles in extra-EU countries. In Europe, the sourcing of forest biomass is framed by both European and national legislations, as well as market-based certification systems, which ensure the product is not contributing to deforestation or biodiversity loss, but rather to sustainable forest management, increasing the abilities of our forests to act as carbon sinks.</p> <p>Additionally, the uptake of wood-based fibres can also deliver on other important environmental objectives, such as the need to control and prevent pollution. Wood-based fibres are 100% renewable, recyclable and biodegradable. They also have a low water footprint during the growth phase and do not lead to soil depletion but are rather capable of reversing soil degradation and erosion. The European pulp and paper industry is a key player in the transition towards a more circular economic model and is committed to retaining the value of the materials used in the loop for as long as possible. This effort can also be recognised in the different solutions our industry has developed to improve the circularity performance within the textiles industry. Therefore, we call on acknowledging the renewability in the ecodesign criteria and parameters for textile products.</p>	Acknowledged
506	5; 1239 & 1277	Please have a look into: Textile Exchange Material Change Insight Report	Acknowledged
507	5.4.1; 1240-1241	How much of these fibres goes into apparel/textiles?	Clarification needed from

ID	Stated section; stated line	Comment	Answer
			<p>the stakeholder During the workshop, the authors asked to the stakeholders to provide information about the fibre composition of textile apparel. The stakeholder is invited to provide data if they are available.</p>
508	<p>5; Question Do you know what is the composition of products included in each category? E.g. 1. T-shirts: 30% made of only cotton, 60% made of polycotton (70% polyester</p>	<p>It is difficult to fix a model of composition for product groups. To some extent, examination of trade figures on CN base give an idea of compositions but not in this detail. On the other hand, it is possible to clarify which fiber suits best for specific groups. For example; Cotton: T-shirts, casual wear, under wear, home textiles Cellulosic fibers (modal, etc): blouses, shirts, dresses etc. Staple polyester fibers: Jackets, pants, skirts etc. Polyamid, acrylic etc.: sweaters etc. Wool: Sweaters, suits, pants etc.</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
	and 30% cotton), 10% made of wool blend (60% wool and 40% polyamide).		
509	5.4.1; 1240-1265	<p>Moving forward, the [...] advocates for the explicit recognition of organic cotton in Section 5.4.1 Fibres of the Preparatory Study, considering its distinct environmental, social, and economic features. We specifically request the inclusion of mandatory requirements for organic cotton to ensure its sustainable integration.</p> <p>Organic cotton farming offers substantial, proven environmental advantages over conventional cotton, including reduced chemical use, decreased water consumption, and enhanced soil health through organic farming practices.</p> <p>Furthermore, organic cotton farming can lead to improved livelihoods, better health and safety conditions, and foster economic advantages for farmers and businesses. Through our work in South Asia, OCA has mobilised a growing number of brands and retailers, increased the global supply of organic cotton, empowered organic cotton farmers, and provided a roadmap for systemic change. This not only accelerates the availability of organic cotton across the entire supply chain but also increases prosperity at the farm level and the positive impact of organic cotton on people and the planet.</p> <p>At the environmental level, by not addressing the properties and standards of intermediate products like organic cotton, there may be missed opportunities to enhance the environmental and social impacts of the entire production process. Organic cotton standards encompass not just the absence of synthetic pesticides in growing the cotton but also considerations of water usage, labour practices, and farmers' health and safety. According to OCA's impact data, organic cotton farmers receive, on average, higher net profit compared to their conventional peers, triggered by premium payments coupled with significant cost reduction.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>Beyond the data tracking the economic indicators of farmers, OCA is currently collecting additional farm-level data aiming to demonstrate the measurable benefits of organic versus conventional cotton production on ecosystem health, water conservation, and carbon emissions, which can provide a solid foundation for policy decisions in the future.</p> <p>We acknowledge JRC’s concerns about the data regarding the origin of raw materials. Advancing raw materials traceability, particularly for commodities like cotton, faces significant challenges due to the scarcity of data on their origin and the difficulty in accessing detailed traceability information. Nevertheless, there are established standards and traceability systems such as the Textile Exchange (TE) and the Global Organic Textile Standard (GOTS).</p> <p>TE’s Organic Content Standard verifies the presence and amount of organic material in the final product and tracks the flow of raw materials from the source to the final product. GOTS certification ensures that textiles are produced organically, including raw materials sourcing. It requires that every step of the supply chain is certified and audited, from the farming of the raw materials to the final manufacturing process. In the organic chain of custody, each participant in the supply chain must maintain detailed records that document the movement and transformation of organic products. This includes information on the origin of the materials, quantities received and shipped, processing methods, and the final products. Similar to the EU Ecolabel, these standards can play a crucial role in ecodesign and advancing traceability to the source.</p> <p>We believe that the solution lies in incentivising the voluntary schemes and investment that have already been made in the industry to scale organic cotton availability and integrity. European consumers will continue to buy textiles made of natural fibres, which will continue to create pressure on ecosystems and climate. If supported, organic cotton and organic cotton farmers can be game-changers.</p> <p>Formalising the role of organic cotton within the ESPR framework will contribute to a more sustainable, resilient, and competitive future for Europe’s textile sector.</p>	
510	5.4.1.; 1243	<p>“From 2021 to 2022, the production of viscose increased from 1.4 million tonnes to 5.8 million tonnes”. The figure for 2021 appears to be wrong, it is 5.8 in 2021 as well.</p>	Accepted

ID	Stated section; stated line	Comment	Answer
			The Table and text were updated.
511	5.3 Main elements affecting the production of apparel textiles; 1247, Table 14: “Estimates of global production of textile fibres”	We recommend the use of more statistics other than Textile Exchange to better understand global production of textile fibres.	Acknowledged The authors invite the stakeholder to provide additional data and references to be included in the report.
512	5.4.1; 1247	The numbers do not represent the apparel sector, but across the industry. We do not recognize this division of material use compared to our own material use portfolio or other equivalent brands like HM/Inditex (who disclose their own material portfolio use in their annual report)	Acknowledged During the workshop, the authors asked additional information about textile apparel fibre composition. The stakeholder is invited to provide data and references to be included in the report.
513	5.4.1; 1247	- Our main materials based on fiber volumes are cotton and polyester, as to a lesser degree manmade cellulose and other fibres counting other synthetic fibres like nylon or elastane, other natural fibres like linen or hemp and animal fibres.	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>- Our material use is diverse between fibres and product categories, but some product categories work as drivers for the overall consumption picture. This includes jeans and t-shirts as drivers for the cotton consumption followed by sweatshirts and trouser, while polyester is mostly used for outerwear.</p> <p>- For deeper insight into our material portfolio, we could be giving this insight in a more confidential manor, e.g. through an oral discussion.</p>	
514	5.4.1.; 1247	<p>Viscose is a MMCF (man-made cellulosic fibre). Is it counted twice? In the text, there are different instances where a distinction is made between man-made cellulosic fibres (MMCFs) and viscose (=rayon in the USA), or between “MMCFs” and several MMCFs. What is the definition of MMCFs?</p> <p>According to the common definition, MMCF includes viscose/rayon and related fibres such as modal and lyocell as well as cupro and acetate/triacetate.</p> <p>Generic Fibre Names: https://bisfa.org/generic-fibre-names</p> <p>BISFA is the International Bureau for Standardization of Man-made Fibres: www.bisfa.org</p>	<p>Acknowledged</p> <p>The text reports the definition of MMCF in section 3.3.1.</p>
515	5.4.1; 1247-1251, Table 14	<p>[...] underscores the necessity to correct Table 14. For instance, MMCF should be considered as a single category of fibre encompassing viscose, lyocell, acetate, modal, and cupro. Currently, the table presents MMCF as a separate category from these fibres. Additionally, the JRC can further classify other synthetics such as polypropylene, acrylics, elastane, and others.</p>	<p>Acknowledged</p> <p>The table was updated. It aims to provide quantities and percentages of fibre types and groups of fibres.</p>
516	5.4.1; 1247	<p>-  Comments on table 14: we welcome relying on the data from Textile Exchange for volumes of textile production globally. However, as the scope of the preparatory study is only on apparel, it is critical to look at data on fibre production for apparel production only to get the correct picture needed as basis for the preparatory study.</p>	<p>Acknowledged</p> <p>The authors are aware about what reported by the stakeholder. For this reason during the workshop, the</p>

ID	Stated section; stated line	Comment	Answer
			authors asked for information about fibre composition of products included in the scope of the PS.
517	5.4.1 page 46; 1247	Could you please clarify why man-made cellulosic fibers are listed separately? Lyocell, modal, viscose, acetate, and cupro are all part of the category of man-made cellulosic fibers. However, this distinction is not applied to other types of fibers listed.	Clarified The table was updated. It aims to provide quantities and percentages of fibre types and groups of fibres.
518	Table 14; Table 14	Double counting MMCFs + lyocell, viscose, modal. MMCF (Man made cellulosic fibres are lyocell, viscose and modal.	Clarified The table was updated. It aims to provide quantities and percentages of fibre types and groups of fibres.
519	5.4.1; 1247	Table 14. Viscose, lyocell, and modal are all kinds of manmade cellulose. In the table MMCF and Lyocell, modal and viscose are mentioned. This is confusing. Is there a risk of double counting? Or should they simply be grouped in the table making up "MMCF total", "Of which viscose/lyocell/modal X/Y/Z-percent units"	Clarified The table was updated. It aims to provide quantities and percentages of fibre types and groups of fibres.
520	Table 14 Estimates of global	The JRC largely uses Textile Exchange's data on fibres for the market analysis regarding the main elements that affect the production of textile. The report shares the following data for the estimated percentages of recycled fibres in 2022:	Acknowledged

ID	Stated section; stated line	Comment	Answer
	production of textile fibers; 1247	<ul style="list-style-type: none"> - Polyester (PES): 14% - Wool: 7% - Polyamide (PA): 2% - Cotton: 1% - MMCF: 0.5% <p>We cross-checked the above data and the latest Materials Market Report related by Textile Exchange in December 2023 - they are correct and up to date. https://textileexchange.org/knowledge-center/reports/materials-market-report-2023/</p>	
521	5.4.1; 1252	Page 46 general, Dramatic increase in polyester fabric is mostly driven from the market conditions eg: expectation of end user, bargaining power of retailers or brands, minimum requirements related to color, mechanical strength or touch properties. The root causes of increasing interest in polyester must be addressed and considered while setting goals. Similarly, in Line 1252, Figure 10 shows the fiber production breakdown by year. The reasons “why the increasing fiber demand is supplied mainly with polyester” should be answered. In this way, the real source of the problem can be revealed and realistic future goals can be set.	Acknowledged
522	5.4.1; 1260	Here, it should be noted that the projected large increase in the use of polyester and other fossil-fuel based fibres has all kinds of negative side-effects: from reliance on sanctioned sources of oil (see https://changingmarkets.org/campaigns/fossil-fashion/) to basically undoing much of the shift towards fossil fuel use in transportation towards fabric production. (see https://www.japantimes.co.jp/commentary/2024/04/01/world/china-oil-demand/ which directly states that "Cheap, fast fashion, not cars, is fueling the surge in petro demand in the world's largest emitter")	Acknowledged
523	5.4.1 Fibres; 1265, Table 15: “Location of production for specific textile fibres”	<p>We would recommend that the JRC review more statistics on fibre production as well as differentiating in more detail the available data. As natural fibres are an agricultural product, the volume and origin of each fibre is well documented throughout the different natural fibre industries.</p> <p>IWTO publishes the Market Information on all wool statistics and other animal fibres: https://iwto.org/resources/statistics/</p> <p>The Discover Natural Fibre Initiative also offers more statistical data on natural fibres: https://dnfi.org/category/statistics</p>	Accepted The text was enriched with more data

ID	Stated section; stated line	Comment	Answer
		<p>The International Cotton Advisory Committee also publishes statistics on cotton: https://icac.org/DataPortal/DataPortal?Year=2021/22%20proj</p> <p>The tracing of fibres from origin to final product is however a different topic and can only be established by reviewing different certification schemes that trace fibres throughout the supply chain.</p>	
524	5.4.1.; 1265	<p>“Location of production for specific textile fibres”</p> <p>Polyamide : Unknown 81% China 15% Taiwan 3% USA 1%</p> <p>China is the major Polyamide (6 & 6.6) producing country according to PCIWoodmackenzie: 63,5% (2021) 66,0% (2022) 69,9% (2023)</p> <p>China’s share of Polyester production (PCI Woodmackenzie Red Book):</p> <p>71,6% (2021) 70,3% (2022) 71,8% (2023)</p> <p>NB: Please do not hesitate to apply to CIRFS-European Man-made Fibres Association for more detailed figures.</p>	<p>Acknowledged</p> <p>The authors invite the stakeholder to provide references of these data, so that can be reported in the text.</p> <p>The text was implemented by additional data with references.</p>
525	5.4.1; 1265, Table 15	<p>The table indicate that 39% of cotton production comes from unknown sources. The EU is a member of the International Cotton Advisory Committee and which publishes detailed statistics as to where cotton is grown and consumed. Suggest you contact them via the website www.icac.org, or contact the EU representative for access. Alternatively, I would be happy to introduce you to the ICAC statistician directly.</p>	<p>Accepted</p> <p>The text was enriched with more data</p>
526	5.4.1; 1265-1267, Table 15	<p>[...] has been made aware of other figures from the Fiber Year 2023.</p> <p>Cotton:</p> <p>China 23%, India 21%, US 16%, Brazil 10%, Australia 5%,Pakistan 5%, Turkey 3%, Uzbekistan 2%, Argentina 1%, Other countries 14%;</p>	<p>Acknowledged</p> <p>The authors invite the stakeholder to provide references of these data, so that can be</p>

ID	Stated section; stated line	Comment	Answer
		<p>Wool: Australia 24%, China 14%, New Zealand 9%, Other countries 53%;</p> <p>Other natural fibres (other than cotton and wool), e.g., jute, coir, hemp, flax, sisal, abaca, kapok, ramie, agave, others: Asia 81%, Greater Europe (EU and non-EU states like Turkey, Belarus, UK, Russia) 11%, Americas 5%, Other countries, 3%</p> <p>For data on synthetic fibres, such as polyester, polyamide, man-made cellulosic fibres, polypropylene, or acrylics, the JRC may look into data from the Wood Mackenzie Chemicals.</p>	<p>reported in the text. The text was implemented by additional data with references.</p>
527	Table 15; Table 15	<p>Split out the MMCF into two parts;</p> <ol style="list-style-type: none"> 1. Pulp production 2. Fiber production 	<p>Acknowledged The authors invite the stakeholder to provide data with references, so that they can be reported in the text.</p>
528	5.4.1; 1268-1269	<p>Not clear what is meant by possibility of recycling? Does it only refer to upcycling or does it also consider the downcycling processes?</p>	<p>Clarified This is the terminology used in Article 5 of the ESPR for “recyclability”.</p>

ID	Stated section; stated line	Comment	Answer
529	5.4.1 - Fibres; 1271	<p>The annual Textile Exchange Materials Benchmark survey captures self-reported information from a subset of industry brands (~400 respondents in 2023.) Respondents are generally more “leading” companies, and Textile Exchange does not verify the data reported.</p> <p>From the 2023 Materials Benchmark (https://textileexchange.org/materials-benchmark/):</p> <ul style="list-style-type: none"> - 98% of recycled polyester volume reported is post-consumer; the majority of this is from plastic bottles - Less than 2% of recycled polyester volume reported is pre-consumer; the majority of this is textile-to-textile. - Approximately 1.9% of cotton and 4.3% of animal fibers reported are recycled. <p>Over half of participants are currently unable to report the breakdown of pre- and post-consumer recycled content.</p> <p>The annual Textile Exchange Materials Market Report captures global production volumes for raw materials and fibers, aggregating production data from various industry associations, public databases, and other sources. There is no single global source for recycled content from textile inputs. The MMR captures total global production of fibers and selected raw materials, whether they are used in the fashion, apparel, and textile industry, or in other industries such as medical textiles or the automotive industry.</p> <p>From the 2023 Materials Market Report (https://textileexchange.org/knowledge-center/reports/materials-market-report-2023/):</p> <ul style="list-style-type: none"> - The global recycled polyester (rPET) fiber production volume decreased from around 9 million tonnes in 2021 to around 8.6 million tonnes in 2022. This equals a decrease in rPET’s market share from around 14.8% of global PET production in 2021 	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>to around 13.6% in 2022.</p> <p>- Less than 1% of this global recycled polyester production is estimated to be textile-to-textile.</p>	
530	5.4.1; 1272	<p>[...] is in line with JRC's comments on the availability of recycled fibres and takes due note on the findings regarding the highest share of polyester within available recycled fibres and its provenance from recycled plastic bottles.</p> <p>In light of these findings, we warn against any inadequate requirement that would lead to an increased use of plastics or synthetic fibres, likely to release microplastics in the environment, while the high-end fashion sector privileges the use of natural fibres in its creations.</p> <p>Besides, incorporating recycled content into creative fashion collections is challenging today as recycled fibres available are mostly below satisfactory levels of quality, durability and recyclability. The garment specification sheet of these fibres are not always compatible with the know-how and technique pertaining to manufacturing the products.</p> <p>Besides, it must be recalled that mechanical recycling used for fibre-to-fibre recycling can deteriorate the fibre and its length. In the case of natural fibres, it also shortens the fibre length and thus, reduces the quality output, necessitating mixing them with virgin ones to reach sufficient robustness. An inadequate requirement to incorporate recycled material may therefore lead to the manufacturing of more fibre or material blends, which have a lower recyclability.</p> <p>For further reference, see : Riemens, J.; Lemieux, A.-A.; Lamouri, S.; Garnier, L. A Delphi-Régnier Study Addressing the Challenges of Textile Recycling in Europe for the Fashion and Apparel Industry. Sustainability 2021, 13, 11700. https://doi.org/10.3390/su132111700</p>	Acknowledged
531	5.4.1; 1272-1275	ESPR needs to distinguish between recycled fibres from textile waste vs. from other sources (e.g. PET bottles)	Acknowledged
532	5.4; 1272-1280; 1281-1321	<p>Eco-design requirements need to be based on updated scientific and representative data. We recommend that where there is not representative data, ad-hoc studies should be promoted for collecting information on consumer behaviour.</p> <p>Regarding the references to recyclability and recycled content, we align with the approach taken in the draft and stress the need to assess the current recycling infrastructure both in the EU and in third markets, and the need for further research & development. However, we stress the importance of providing accurate and precise data in the preliminary study. For example, the numbers included in sentence 1242 do not represent the apparel sector, but across the industry. Also, in the table 1303 we cannot recognise the picture that 20+ chemical recycling plants should exist on full scale and how much of</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>this would be textile-to-textile.</p> <p>This is highly dependent on state-of-the-art technology, which is in a continuous state of development. Therefore, the focus should be placed on innovation and the expectations for technology development going forward.</p> <p>Achieving satisfactory recycling results depends largely on a stable supply, a clearly defined composition of textile waste, material recognition, the semi-automation of sorting, and a strong, reliable market demand. Recyclers face considerable fluctuations and substantial variability in the quality of textile waste they receive.</p> <p>In this respect, the conversation on eco-design requirements should be coupled with efforts to continue the development of separation and purification techniques and aligned with the state of the technology.</p> <p>When it comes to recycled content availability, it's crucial to consider that just 1-2% of the world's recycled polyester production is converted into fibre-to-fibre, based on last year's global production volumes. It is crucial to develop an updated study to get a clear picture of the current availability of recycled fibres. Based on these results, minimum requirements can be set to increase ambition and the precise targeting of areas where further investment and innovation is needed to ensure that recycling capacities are increased and that recycled fibres are of the same quality as virgin fibres.</p>	
533	5.4.1 Fibers; 1272-1276	<p>Scaling textile-to-textile recycling: We fully agree with the assessment of the at present very low recycling rates in the textile industry especially when it comes to textile-to-textile recycling. On the other side, the main root cause of this gap is not the technical feasibility of fibre-to-fibre recycling as multiple solutions are already validated, but a lack of market demand in the past that has led to poor financing opportunities in this domain. We therefore strongly believe that setting eco-design performance requirements on recycled content is crucial for driving the textile recycling industry forward. Bold targets must be established and progressively increased over time to create meaningful market demand for a recycling industry to emerge. We agree with such requirements excluding rPET from recycled content targets in midterm, as foreseen in the EU Textile Strategy, but using waste of any kind in the beginning will be both critical to scale the recycling industry as well as avoiding waste leaking into the environment, no matter of its origin. We therefore believe that the accepted feedstock for future eco-design measures should look at both, post-industrial waste (off cuts) as well as post-consumer waste and allow for a limited transition period also rPET. Given the homogeneity of post-industrial waste, at least at the beginning it is a better feedstock to scale and accelerate the emergence of economically successful textile recycling technologies. In the medium term, targets need to move towards accepting post-consumer waste only and fully replace rPET as a feedstock for textiles.</p> <p>Today there are still large differences between fibres and their materials when it comes to technology readiness on recycling.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>However, for polyester-based textiles, the technologies have come further and are well advanced. Therefore, to give a number of magnitude, we recommend considering 25% recycled content in polyester-based textiles by 2027, rising to 75% by 2030 (including during a limited transition period all waste feedstocks to count towards the target).</p> <p>Our own experience has shown that while our transition towards a circular portfolio was possible within a few years, the customer acceptance would take much longer unless it is supported by creating a market demand through setting mandatory recycled content eco-design requirements. Since our public commitment to circularity in December 2016, we have been able to achieve 2/3 of recycled content in our functional textile portfolio (reaching almost 25% of fibre-to-fibre recycled this year) and also passed 95% monomaterial portfolio which is a precondition for recyclability in laminated textiles.</p>	
534	5.4.1; 1273-1275	<p>"come from recycling of plastic bottles, which are made of a specific type of polyester that is called polyethylene terephthalate (PET) (Textile Exchange, 2022)."</p> <p>In this context it is important to mention, that the bottles are already currently (at least in many areas, such as Finland) circulating very well and have formed a good circular economy system. Now, with this recycled material demand, there is a risk of breaking this well-working system.</p>	<p>Rejected</p> <p>The authors think that this is not the place to report such arguments. The inclusion of this argument will be potentially reported in the following Tasks of the PS, when design options will be developed.</p>
535	5.4.1; 1277-1280, Table 16	<p>[...] seeks clarification on whether post-industrial and post-consumer waste are encompassed, and if recycling plants incorporate preparation for recycling. Linked to the differences in application of the waste legislation and end-of-waste criteria, many recycling activities might not be included in these figures. The list of recycling plants that are counted has to be shared, so that the figures can be analysed properly.</p>	<p>Acknowledged</p> <p>The topic will be addressed in Task 4.</p>
536	5.4.1; 1277	<p>Line 1277, Table 16 shows that the percentage of recycled fibers remained the same in all fiber types over the 4-year period. It is also stated that 99% of recycled polyester fibers come from plastic bottles. Difficulties and drawbacks with textile-to-textile recycling for polyester or other fibers should be mentioned. In addition, it should be mentioned why the amount of</p>	<p>Acknowledged</p> <p>The sector will be investigated in Task 4.</p>

ID	Stated section; stated line	Comment	Answer
		recycled fiber has not changed despite the developing technology and increasing fiber production amounts in the 4-year period. What are the obstacles ?	
537	5.4.1; 1277	<p>Table 16. Estimated percentages (%) of recycled fibres in recent years - This is fibre-to-fibre recycling, isn't it? Please specify. Note that a lot more of textile fibres/materials are recycled but into composite materials, rags, insulation etc. Such downstream recycling is also good in some cases, if replacing other raw material. On line 1278 it says that the PES is 99% from bottles but for the other fibres a clarification would be appropriate.</p> <p>Sustainable clothing futures - Mapping of textile actors in sorting and recycling of textiles in Europe - IVL.se</p>	<p>Acknowledged</p> <p>The sector will be investigated in Task 4.</p>
538	5.4.1; 1281	When setting requirements for the recycled content, existing recycling capacities and availability of recycled fibre shall be taken into account. Similarly, when establishing rules for the recycled content, trade-offs with other sustainability goals should be examined.	<p>Acknowledged</p>
539	5.4.1; 1281	<p>The report (pages 47-49) refers to sorting capacities and the number of recycling plants. Our understanding is that these numbers are based on the numbers shared through a collective platform. While new innovative recycling technologies are fast emerging, the maturity and scale is still rather low, especially in terms of chemical recycling. And we know from experience that it takes years to go from pilot to industrial scale. We believe that these graphs might give a rather too optimistic picture, especially on the number of textile recycling plants for chemical recycling of polyester and poly-cotton blends. The graph showing the scale of the recycling plants in the report does not include the definition of pilot or scale and would also be useful to bring the timeframe for scaling, into the picture as well.</p> <p>We stress the utmost importance of verifying these numbers and the actual capacity. On the other hand, to define a recycled content requirement, in addition to the recycling capacity, the actual amount of recycled fibre available and the commercial viability of the products with recycled content need to be considered.</p> <p>The lack of availability of fibres for recycling and the capacity of recyclers are both important concerns among members.</p> <p>When setting recycled content target, look at the available of recycled fibres, not only the capacity, as well as the trade-offs of other ecodesign requirements will be critical.</p>	<p>Acknowledged</p> <p>The current capacity was not based on self declarations reported in the Figures, but it was based on the study performed by Huygens et al. (2023).</p>
540	5.4.1; 1281	It is not enough to only look at recycling capacities. Especially sorting capacities are of relevance. Currently the capacity to recycle used textiles is not fully exhausted because sorting capacities are too low. (source: Sustainable clothing futures	<p>Clarified</p>

ID	Stated section; stated line	Comment	Answer
		(ivl.se): Mapping of Textile actors in sorting and recycling of textiles in Europe, https://www.ivl.se/download/18.5ae47fd818530c6f060211dd/1677232851248/C736.pdf). There is a need for a constant inflow of feedstock for recycling. Good sorting and pre-processing (removing trims etc) are key.	The capacity reported by Huygens et al (2023) includes the capacity of the whole recycling system. More details will be reported in Task 4.
541	5.4.1; 1281-1290	Next to mentioning the share of recycling plants in main production countries and consumption countries, a link should be drawn to the availability of recycling plants in countries who process large amounts of second hand textiles/ textile waste that is being exported to countries such as Ghana and Pakistan from the EU (EU exports of used textiles in Europe's circular economy — European Environment Agency (europa.eu), https://www.eea.europa.eu/publications/eu-exports-of-used-textiles)	Clarified Current available analysis of the fate of second-hand market was reported in section 5.1
542	5; 1281-1320	Regarding the sorting capacities and the number of recycling plants we want to stress out the importance of verifying the actual capacity. For other hand, in order to define a recycled content requirement, in addition to the recycling capacity, the actual amount of recycled fibre available and the commercial viability of the products with recycled content need to be considered.	Acknowledged Capacity was taken from Huygens et al. (2023)
543 a	5.4.1; 1281	As mentioned at the JRC webinar in March, although there is no reliable information, the number of recycling sites alone might not cover the current status, and while it is important to state the annual amount managed, it is essential to add that no information exists. Even in chemical recycling, the annual production volume is important to show the current status. There are no comprehensive materials available at this moment, and reclaimed wool factories are mostly micro enterprises, and both the list and volume are not available neither.	Acknowledged
543 b	5.4.1; 1281	Mapping of recyclers shared by email: Innovator Country	Acknowledged

ID	Stated section; stated line	Comment	Answer
		Unifi China Loop industries Canada Saya China Jiaren China Carbios France Fraunhofer Germany Revalyu India Garbo Italy Jeplan Japan Teijin Japan Cure Netherlands Ioniqa Netherlands Gr3n Switzerland DePoly Switzerland FENC Taiwan RE&UP Turkey Poseidon plastics United Kingdom BP Infinia United Kingdom Worn again United Kingdom Ambercycle United States SYRE United States Circ United States Protein Evolution United States Eastman United States Textile Change Denmark FarEastern China Blocktexas Australia Samsara Australia	
544	5.4.1; 1291-1294, Figure 11	This shows the number of recycling plants classified by location. However, these figures fail to capture the actual quantity of textile waste processed. Consequently, the following enhancements are proposed: 1. Listing the textile waste recycling capacity (in tons) against location	Acknowledged

ID	Stated section; stated line	Comment	Answer
		2. Providing a comprehensive explanation of mechanical and chemical recycling, accompanied by examples.	
545	5.4.1; 1291 1295	<p>Misleading wording about Europe (non-EU) Rest of EU (which is EU)</p> <p>The sentence is misleading, it suggests a.) that most of the plants (which ones?) across the globe are capable of processing blends; b.) fibre composition (included blends) is no longer a problem for most of the recycling plants</p>	<p>Rejected The wording is not misleading.</p> <p>Accepted The sentence was updated</p>
546	5.4.1; 1291	<p>A more updated inventory of sorting and recycling facilities in Eu is available here (2023): https://www.ivl.se/english/ivl/publications/publications/sustainable-clothing-futures---mapping-of-textile-actors-in-sorting-and-recycling-of-textiles-in-europe.html</p>	Acknowledged
547	5.4.1; 1295	<p>Because the current statement might mislead that every type of materials used in products could be recycled, it might be desirable to change the statement to "the level has reached that one single type of fibres can be recycled commercially, but with no cost competitiveness."</p> <p>Regarding recycling of products using multi-type of fibres, the separation technology has not yet completed fully, but it is possible to separate and reuse only one type of fiber, and there are no commercial examples where all fibers are fully recycled.</p> <p>There are no operating examples of recycling of the products with triple blends or higher, or most common cases polyurethane blended products that have added stretch properties. At present, it has become only possible to separate polyurethane at the laboratory level, and practical application is a future challenge.</p> <p>SCIRT project, which has received funding from the Horizon 2020 Programme, conducted webinar on textile recycling this Spring with introducing polyurethane blended recycling below; https://scirt.eu/event/the-challenges-and-opportunities-of-elastane-seperation-a-scirt-webinar/</p>	<p>Partly accepted The sentence was changed</p>
548	Section 5.4.1; Figure 12	Figure 12 shows the number of textile recycling plants classified by input fibre. It would be interesting to investigate also the output of the recycling processes and their average yields, which is particularly important in the case of chemical recycling.	Acknowledged
549	5.4.1; 1300-	The focus should shift to portraying the capacity of textile waste (rather than the number of recycling plants) against input fibres.	Clarified

ID	Stated section; stated line	Comment	Answer
	1302, Figure 12		Capacity was reported based on Huygens et al. (2023).
550	Section 5.4.1; Figure 12	Figure 12 shows the number of textile recycling plants classified by input fibre. It would be interesting to investigate also the output of the recycling processes and their average yields, which is particularly important in the case of chemical recycling.	Acknowledged
551	5.4.1; 1300	-◆Comments figure 12: While new innovative recycling technologies are fast emerging, the maturity and scale is still rather low, especially in terms of chemical recycling. And we know from experience that it takes years to go from pilot to industrial scale. We believe that these graphs might give a rather too optimistic picture, especially on the number of textile recycling plants for chemically recycling of polyester and poly-cotton blends. The graph showing the scale on the recycling plants in the report does not include the definition of pilot or scale and would also be useful to bring the timeframe for scaling, into the picture as well.	Acknowledged More details will be provided in Task 4
552	5.4.1; 1303	We cannot recognize the picture that 20+ chemical recycling plants should exist on full scale. We can only point to one company in China (but cannot say if this is covering several facilities). And how much would be textile-to-textile?	Acknowledged The recycling capacity was based on Huygens et al. (2023)
553	5.4.1; 1303-1306, Figure 13	It would be beneficial to explain and differentiate between full-scale and pilot-scale operations, considering factors such as recycling capacity and technological maturity level.	Acknowledged
554	5.4.1; 1303	A more updated inventory of sorting and recycling facilities in Eu is available here (2023): https://www.ivl.se/english/ivl/publications/publications/sustainable-clothing-futures---mapping-of-textile-actors-in-sorting-and-recycling-of-textiles-in-europe.html	Acknowledged
555	5.4.1; 1307	Same as pointed out in 3rd comment. The document by the EU Environment Agency, after the publication of the JRC report, shows that the percentage of items incinerated, though only an estimate, however. It might be better to introduce the contents of the report. “Volumes and destruction of returned and unsold textiles in Europe’s circular economy”, EEA, Published 04 Mar 2024 https://www.eea.europa.eu/publications/the-destruction-of-retained-and	Acknowledged The report highlighted by the stakeholder was report data relevant for the analysis

ID	Stated section; stated line	Comment	Answer
		Note; The number introduced by this publication were all estimated value and each breakdown category was different source by source.	performed in Task 4.
556	5.4.1.; 1307	Line 1307-1311, Inability to receive long fiber size after recycling is a result of mechanical recycling. A lot of investment is made by European Commission under Horizon Europe Programme, especially for developing chemical recycling methodologies for textile wastes in order to provide highly efficient textile to textile recycling. Some start-ups are also focusing on this issue but currently there are not many options available for chemical textile to textile recycling of different types of fabric compositions. Similarly, different types of fiber blends usage makes the recycling more complex and tailor made, but this variation also comes from market demand. This must be considered while setting goals.	Acknowledged
557	5.4.1; 1308	Misleading wording = downcycling, not a F2F or Textile2Textile	Clarifications needed from the stakeholder The authors invite the stakeholder to clarify the comment in the following consultation. The authors do not understand what the comment refers to.
558	5.4.1; 1308	It is desirable to clarify the definition of the term recycle. Making waste cloth and insulation material both should be regarded as upcycling for other uses, under current technical constraints, to extend the fibre lifespan. We could not recycle them again except some portion of insulation but better than direct discarding such as incineration or landfill. They do not contribute fundamentally to the transition to a circular economy, the objective of ESPR.	Acknowledged Task 4 reports what suggested by the stakeholder.
559	5.4.1; 1312	In line with the data presented on the EU recycling capacity, [...] calls for ESPR measures regarding product's recyclability that should duly consider local solutions and value chains, product specificities and technical challenges. In this regard, innovation must be pushed, in a joint effort between public authorities and producers, to develop efficient textile recycling solutions.	Acknowledged

ID	Stated section; stated line	Comment	Answer
		Currently, the treatment capacity of collected textiles is indeed lower than the estimated amount of textiles collected in the European Union. Besides, textile recycling encounters technical and technological barriers such as the lack of efficient sorting solutions, disassembling processes and the complexity of supply chains including multiple stakeholders.	
560	5.4.1; 1312-1313	For the recycling of textiles, it is not only relevant what the main fabric consists of. Impurities (like elastane, trims, yarn of different material than main fabrics etc.) impact the efficiency of the recycling processes	Acknowledged This aspect is addressed in Task 4
561	5.4; 1314	This capacity outlooks reaffirms that both virgin and recycled material based solutions are needed, while virgin based solutions will be accounting for the major share of the textile consumption in the EU by 2035 and beyond. Wood-based textile fibres based on novel low impact manufacturing technologies can support the environmental objectives of the EU policies. However, this requires that the ecodesign principles and other relevant EU policies recognize the potential of these novel fibres, and do not favor other fibres by emphasizing certain criteria such as physical durability, while ignoring others such as the impacts from microplastics or fossil CO2 emissions from the incineration of fossil-based synthetic textiles. While helping to reduce the environmental impacts in the textile industry, the novel textile fibre technologies also give an economic opportunity within the EU. For more, see https://texfash.com/special/out-of-the-woods-nordic-countries-take-the-lead-with-a-range-of-innovative-fibres	Acknowledged
562	5.4.1; 1318	Here more as a question; global fibre demand is expected depending sources to grow even 31 Mtons between 2022-2030. As EU is among the top 3 importers/exporters the demand for sustainable fibre materials seem to be clearly larger than in this study estimated 0,2-0,6 Mtons of availability increase of the recycled cotton within the same time. Here a question is that if the recycled fibre is close to become a synonym to sustainable fibre, is it considerable to leave a door open for sustainable virgin fibres, at least if they rank well in criteria on overall sustainability and the availability of the recycled fibres is considered to be on the low level against the forecasted demand increase?	Clarified The answer to this question will be provided in the development of the PS in the following Tasks.
563	5.4.1; 1320-1321, Table 17	[...] points out that blends, although common, are absent from the table, despite being a significant challenge in the recycling of post-consumer textile waste. The following studies can be referenced: Techno-scientific assessment of the management options for used and waste textiles in the European Union. JRC Study. 2023 Another relevant outcome of the study is also that 31% to 37% of potential recyclable fractions analysed are contained in fibre mixes, often polycotton blends. The actual share is likely even higher, given that elastane may also be present in the fractions classified as 'pure' in the report due to analytical limitations. Sorting for circularity Europe. Fashion for Good, 2022 September. Source: https://reports.fashionforgood.com/report/sorting-	Partly accepted The text was updated.

ID	Stated section; stated line	Comment	Answer
		<p>for-circularity-europe</p> <p>The report provides data on share of specific textile fibres in apparel and home textiles which are part of blends (see Annex 9 for further estimates on blended fibre shares).</p>	
564	5.4.1.; 1320	Line 1320-1340 chemicals general, biobased or green chemicals are already available in market but they have some shortcomings like; higher prices or lower performance. Price pressure is limited their use.	Acknowledged
565	5.4.1; 1321	<p>Important addition to the section – consideration of post-industrial waste feedstocks: Whilst the fashion and apparel industry is highly-committed to scaling textile recycling, currently, the global textile industry (including Europe) is still challenged by the unavailability of an efficient recycling ecosystem.</p> <p>While high-end recycling technologies are fast emerging, there is no established collection and sorting systems for textile waste to be fed into the available recycling technologies yet. Availability of quality feedstock for recycling technologies is an important pre-requisite for the transition towards an efficient circular textile industry. Therefore, this lack of collection and sorting infrastructure is an important reason for the current restricted textile-to-textile recycled content in new textile products as it limits reliable access to recyclable feedstock.</p> <p>Amongst others, existing recyclers and innovators are currently relying mainly on post-industrial waste (offcuts) feedstock as a steppingstone to test, calibrate and reiterate their technologies. Primary reason being that the quality and reliability is high when it comes to post-industrial feedstock. As the availability of high-quality post-consumer feedstock today is still limited, post-industrial is utilized for the development of these technologies. The recycling technology landscape is set to radically shift with the emergence of high-grade textile to textile recycling innovations in the next few years. These technologies will drive the uptake of post-consumer feedstock thereby significantly increasing post-content in textile products.</p> <p>For the purpose of developing effective eco-design measures, we strongly recommend in the context of the preparatory study to include the role post-industrial feedstocks will play to scale recycling of post-consumer textile waste. It will be critical to consider recycled post-industrial waste to count towards future recycled targets in addition to post-consumer waste feedstocks to truly drive and accelerate the textile to textile recycling industry.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		An additional driver for scaling textile to textile recycling will be to consider eco-design measures on recyclability. It is a prerequisite to enabling effective uptake of recycled content. We recommend assessing how the worst recycling disruptors can be limited in the preparatory study.	
566	5.4.2 Chemicals; 1322 – 1343: general comment on chemicals	This section fails to mention the progress made by the textile industry over the last decade in eliminating the hazardous substances used. Neither does it suggest any methods for decreasing chemical consumption by the textile industry. We recommend the JRC to contact with Tessile e Salute in Biella, Italy on their recent research on textiles and chemicals: https://www.tessileesalute.it/en/	Acknowledged The following steps of the PS will address more in depth the use of chemicals in textiles.
567	5.4.2; 1322	We suggest reaching out to AFIRM: https://afirm-group.com/	Acknowledged
568	5.4.2; 1322-1343	<p>- Important addition on traceability and transparency in the chemical supply chain: Currently, the primary information carrier for chemical products, the Safety Data Sheet, does not provide textile brands and our suppliers, as downstream users, with enough information on the content of chemical formulations and hazardous properties. Information on classified substances which do not exceed the limit of 0.1% w/w in chemical mixtures (the minimum threshold level for substance disclosure of hazardous substances in CLP/GHS), but also due to the Confidential Business Information (CBI)/trade secret clause under GHS. This situation leaves us with scarce information about most ingredients in chemical products, hindering our chemical traceability efforts and causing the risk of regrettable substitutions. This is in particular true for dyes and prints, which are known to be the most polluting substances but for which reference to the CBI clause seems to be the norm. This poses a critical challenge to the industry to overcome for the purpose of tracking substances of concern.</p> <p>- The industry is already widely applying several programmes to identify and test restricted substances in production and in the end product. Please see the following links for further information:</p> <ul style="list-style-type: none"> o Zero Discharge of Hazardous Chemicals, ZDHC, Programme: ZDHC is a multi-stakeholder organisation comprising over 320 signatories from across the industry including Brands, Suppliers, Solution Providers and Chemical Suppliers. The Roadmap to Zero Programme, by ZDHC, leads the fashion industry to eliminate harmful chemicals from its global supply chain by building the foundation for more sustainable manufacturing to protect workers, consumers and our planet's ecosystems.. https://www.roadmaptozero.com/ 	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> o ZDHC Manufacturing Restricted Substances List, MRSL: https://mrsl.roadmaptozero.com/ o ZDHC Gateway (requires log-in), database of MRSL-compliant chemicals that can also give insights to Chemicals taxonomy: https://www.my-aip.com/ZDHCGateway/Search.aspx o Apparel and Footwear International RSL Management, AFIRM Group: Founded in 2004, the Apparel and Footwear International RSL Management (AFIRM) Group is a member-driven organization of apparel and footwear companies collaborating to promote chemicals management in the global supply chain. Since its founding, AFIRM's focus has been the continuous advancement of chemicals management including phasing out or limiting restricted substances to established limits in apparel, footwear, and accessories. https://afirm-group.com/ o AFIRM Restricted Substances List, product RSL, for Apparel, Accessories and Footwear: https://afirm-group.com/afirm-rsl/ <p>- Substances of Concern in recycled fibre materials: The extreme variation in presence/concentration of legacy chemicals in recycled materials must be considered when setting recycled content requirements and disclosure requirement on substances of concern. In particular, this is critical for post-consumer waste where chemical content may differ with orders of magnitude within the very same lot/batch. If part of the intention of the eco-design measures is to incentivise a larger portion of textile products made from recycled fibres, information requirements on Substances of Concern must take this situation into account to not forfeit its own purpose.</p>	
569	5; 1322-1343	Close the knowledge gap on chemical content for the chemical products used in the textile industry by promoting and ensuring harmonized and completed chemical transparency from chemical manufacturers. Completed and standardized Technical Dossiers and Safety Data Sheets (SDS), including no toxic observed effects, are needed following the principle 'one substance, one assessment', to allow informed decisions on chemical safe usage, restrictions and avoid regrettable substitutions.	Acknowledged
570	5.4.2; Question Can you share a detailed taxonomy of chemicals used in the	There are many chemicals used in the industry depending on the functionality or performance of the final product, depending on the used fiber, yarn and fabric. The risk in making taxonomy is the fact that, any single chemical may be used in various applications.	Acknowledged

ID	Stated section; stated line	Comment	Answer
	apparel textile sector with corresponding market data?		
571	5.4.2 Chemicals; 1322	Additional information related to this topic may be found in the SMED report: REPORT 6/14. Chemicals in textiles. kemikalieinspektionen.se. Risks to human health and the environment. Report from a government assignment: https://docplayer.net/114724-Report-6-14-chemicals-in-textiles-kemikalieinspektionen-se-risks-to-human-health-and-the-environment-report-from-a-government-assignment.html	Acknowledged
572	5.4.2; 1325-1330	Chemicals are a very versatile group of materials - some of them are very hazardous, some of them not at all. So its important that we discuss the use of chemicals more rigorously, instead of treating them as a lump sum.	Acknowledged
573 a	5.4.1; 1325-1330	I would recommend this report concerning chemicals in textiles: Advancing life cycle assessment of textile products to include textile chemicals Inventory data and toxicity impact assessment 246361.pdf Advancing life cycle assessment of textile products to include textile chemicals Inventory data and toxicity impact assessment	Acknowledged
573 b	5.4.2; 1322	See references sent via email Survey of the presence of hazardous chemical substances in products and articles that were not restricted within the EU. Rapport 4/21: Kartläggning av farliga kemiska ämnen i textil - Kemikalieinspektionen "Assignment to compile information about risk to human health and the environment from substances present in textile articles. The results may be used for further work on risk reduction measures on hazardous chemical substances in textile articles" Report 6/14: Chemicals in textiles - Kemikalieinspektionen Study to explore how knowledge about biocide treatment of some material types can be found in technical and scientific literature. PM 4/17: Biocidal substances in the material of marketed articles – exploring the literature - Kemikalieinspektionen Enforcement report of antibacterial underwear Tillsyn 4/23: Tillsynsprojekt om antibakteriella underkläder 2022 - Kemikalieinspektionen Information on Swedish Chemicals Agency 's webpage	Acknowledged

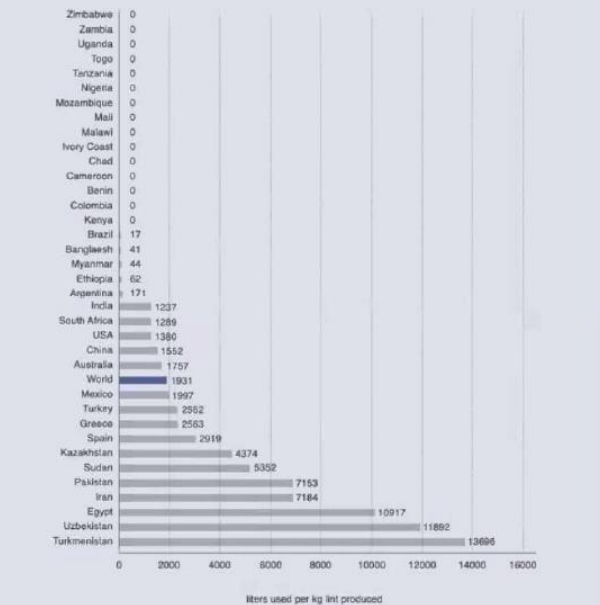
ID	Stated section; stated line	Comment	Answer
		<p>Large amounts of chemicals in the production of textiles - Kemikalieinspektionen</p> <p>Information on Swedish Chemicals Agency 's webpage https://www.kemi.se/hallbarhet/kemikalier-i-en-cirkular-ekonomi/sakra-och-hallbara-textilier-i-en-cirkular-ekonomi</p>	
574	5.4.2; 1326	The ecodesign criteria should take a full account of the impacts originating from chemical use in the textile manufacturing. For example, they can bring physical durability currently highlighted in the draft criteria while creating adverse environmental impacts in the manufacturing phases. Emphasizing physical durability, while not requiring holistic environmental assessment can be counterproductive in terms of environmental impacts at the system level.	Acknowledged
575	5.4.2; 1338	If the price of a chemical substance is the same regardless of the country of manufacture (brand), a monetary comparison is appropriate, but in reality, there is a price difference (a difference in purity), so a weight comparison is appropriate. (The UN statistics cited provide only amounts). In the case of dyes, we could find almost no single-component chemical formula but mixed, and it is possible to dye even if the dyeing active component is less than 50% (the rest is mostly unreacted raw materials). The level of the manufacturing process should define its product purity and creates a price disparity.	Acknowledged
576	5; 1340	The source for energy consumption is from 2004, outdated	Acknowledged The authors invite the stakeholder to provide more updated data.
577	5.4.2.; 1341	Line 1341-1361 energy, general, different types of cleaner energies like green hydrogen are currently discussed in textile industry however, their use are limited due to price and availability. Use of greener energy sources by manufacturers should be supported and customers who are not manufacturers should also made responsible from this so that they became more open to discuss about this change. This must be considered while setting goals.	Acknowledged
578	5.4.3; 1344-1350	2004: what about the situation in more recent years? are there any more recent data? No mention of energy consumption during recycling processes. These should also be considered	Acknowledged The authors invite the stakeholder to provide more updated data.
579	5.4.3; 1345-1378	- 1362-1368: The preparatory study must consider facility level data, not only country energy mix averages in production to determine a truthful picture of the CO2 footprint of a product. This will be critical when LCA assessments will be undertaken in the subsequent steps of the preparatory study of the JRC	Acknowledged The aim of the PS is not to

ID	Stated section; stated line	Comment	Answer
		<p>- Line 1358: when producing apparel, the most energy and carbon intensive stage of production is the step of fabric making i.e. dyeing and finishing. These are high-heat processes that today often are run on coal and/or biomass boilers. There are yet very few economically viable electricity-based alternatives, however the industry is exploring and investing in alternatives. Transitioning to electricity-based alternatives requires that supply of renewable electricity is in place as a prerequisite. Where that is not the case today, transitioning to electricity might actually mean that carbon footprint of apparel production could increase in the short term. This illustrates how sequencing and timing are fundamental elements to consider when setting policy requirements. Increasing the generation of renewable electricity requires time.</p> <p>- Comments on whole section: Reducing the energy intensity and the carbon intensity in apparel production is the sole most effective strategy to reduce the CO2 footprint of apparel. Many brands in the industry have been taking ambitious steps towards reducing their carbon emission's footprint and setting Science Based Targets to align their commitments with the Paris Agreement. Large efforts are being made towards systemically phasing out carbon intense energy sources and finding electricity-based alternatives. It will be critical that any future requirements under the ESPR incentivises manufactures to increasingly invest reducing their carbon footprint. In this context, it is critical to take into account facility level data as well as primary data (not country averages), when assessing future eco-design measures. Only primary data can illustrate the progress made, and can differentiate the carbon emissions of the same products made in different facilities. i.e this could incentivise manufacturers to invest in cleaner energy sources. For any potential future eco-design measures on energy use or carbon footprint, it will be critical to use the data that brands and manufactures have already been collecting for years and that will allow for platforms already used by the industry for this very purpose..</p>	<p>perform a product declaration. See in Task 4 the definition of technologies. The stakeholder is invited to provide data at facility level.</p>
580	5.4.3.; 1345	Line 1345, Energy consumptions regarding to stages of textile production (Fiber production, fiber preparation, yarn production, fabric production, wet treatments, confectioning) should be shared. In this way, it can be easily determined at which stages the transition to sustainable/renewable energy sources should be prioritized in textile manufacturing.	Acknowledged
581	5.4.3; 1348-1350	<p>"Table 7 in Section 3.3.1 reports that almost all the stages of the textile value chain require the use of energy.</p> <p>1349 Nevertheless, the manufacturing stages cover about 70-80% of the total life-cycle energy consumption (Sandin, Roos, Spak, et al., 2019; Quantis, 2021)."</p> <p>When referring to this percentage, it is vital to understand what the use-phase assumptions were. We did a very similar study, but just increased the use phases to reflect typical sporting t-shirt use phases, which lead to the result that energy consumption of production is something like 50%.. And if you increase use times to the technical maximum of the garment, then the production phase portion of the life cycle energy consumption is only about 30% (https://www.sciencedirect.com/science/article/pii/S0048969723024427#ec0005)</p>	Acknowledged Task 5 will report an environmental assessment of products in the scope.

ID	Stated section; stated line	Comment	Answer
582	5.4.3; 1362	In this figure, I think it is more important to see the absolute greenhouse gas emissions of each country mix as a comparison, so please don't make the figure to 100% but rather the absolute emission levels. This can be then further subdivided to the energy sources. but like this, the table is not as informative as it could be.	Rejected Figure 15 aims to provide the composition of energy used by the textile and leather industry in specific countries. The authors will include quantities if the study will need it.
583	5.4.3; 1372-1373	Would be interesting to not only look at electricity prices paid on the market but also the price if environmental and climate impact were to be internalised.	Acknowledged The economic assessment will be performed in Task 5.
584	5.4.3; 1376	Japan's residential and industrial electricity price rates for 2022 quoted as NA, but the data by the Agency for Natural Resources and Energy, Japanese Government shall be available by the end of 2024.	Clarifications needed from the stakeholder The authors invite the stakeholder to provide the reference of the data mentioned.
585	5.4.4 Water; 1379-1397: general comment	It is important to distinguish between the terms water consumption and water use, they differ, and it is not clear if the preliminary study takes note of the difference? Water utilisation and water consumption are often mistakenly interchanged. In Life Cycle Assessments (LCAs), water consumption is defined as the amount that is evaporated or used by plants through transpiration, whereas water use pertains to water that is redirected and subsequently deteriorated in some manner. When comparing fibres, cotton requires more water for each kilogram of fibre produced due to consumption than polyester does.	Acknowledged This aspect will be specified and addressed in Task 5 when the

ID	Stated section; stated line	Comment	Answer
	on the water section	<p>However, in terms of water use, polyester's requirements exceed those of cotton. When considering water as a negative impact, it will be important to distinguish between water use and water consumption, as otherwise the assessment of this impact as well as the comparison between fibres will not be correct and may lead to false recommendations.</p> <p>Source: https://www.wri.org/insights/whats-difference-between-water-use-and-water-consumption#:~:text=%E2%80%9CWater%20consumption%E2%80%9D%20is%20the%20portion,no%20longer%20available%20for%20reuse.</p>	environmental assessment will be performed.
586	5.4.4; 1379	It is important to mention water scarcity, as this is the main environmental impact surrounding water consumption. It should be presented that water consumption occurs in water scarce regions and how this relates to the fashion industry.	Acknowledged This aspect will be specified and addressed in Task 5 when the environmental assessment will be performed.
587	5.4.4 Water; 1379-1388 (table 20)	<p>[...] would also like to point out a point regarding references studies. For example, the statement that hemp has a higher water consumption than cotton based on some of them is contradicted by other studies such as:</p> <ul style="list-style-type: none"> - Hemp meets fashion and function" 62nd Dornbirn-GFC 2023 September 13th-15th, 2023 - Industrial hemp fibre: A sustainable and economical alternative to cotton, Article in Journal of Cleaner Production May 2020 - Industrial hemp in Germany: Overview in figures, ELEMENTE Materialien zur Cannabiswirtschaft Volume 19. 	Accepted Table 20 was updated
588	5.4.4; 1379	[...] emphasizes the importance of clearly distinguishing between rainwater and forced irrigation to enhance understanding of their respective impacts.	Acknowledged This aspect will be specified and addressed in Task 5 when the environmental assessment will be performed.

ID	Stated section; stated line	Comment	Answer
589	5.4.4; 1379	New novel fibre technologies can significantly reduce water consumption, and other environmental impacts, in the beginning of the textile value chain. For more about the novel fibre technologies, see https://texfash.com/special/out-of-the-woods-nordic-countries-take-the-lead-with-a-range-of-innovative-fibres	Acknowledged
590	5.4.4; 1380, 1384	<p>Wording: a huge amount of water and fresh water</p> <p>Cellulosic fibres not mentioned in the range of most water consuming- fibres – only in the table</p>	<p>Clarification needed from the stakeholder</p> <p>The authors invite the stakeholder to clarify their comment in the next consultation.</p>
591	5.4.4; 1381	<p>Regarding the amount of water used, there has been discussions about unknown sources and regional disparities. In particular, regarding the amount of water used in cotton cultivation, the challenges introduced in a side session jointly held by the Transformers Foundation and Cotton Diaries at the OECD Garment Forum in 2022. The organizers introduced how the use of average values deviates from the actual situation, and in cotton cultivation, there are factors such as the weather conditions of the cultivation area and fluctuations in rainfall during the cultivation year.</p> <p>The reports introduced during the session contained fact-checking, they found that the figures cited by the media and governmental reports not only lacked clarification of the original source, but also were far from the reality and they pointed out that a fake.</p> <p>The file separately sent to JRC contains a graph of the amount of irrigation water required for cotton cultivation by cultivation areas;</p>	<p>Acknowledged</p> <p>This aspect will be specified and addressed in Task 5 when the environmental assessment will be performed.</p>

ID	Stated section; stated line	Comment	Answer																																																																												
		<p>Blue water used per kg lint produced</p> <p>Fig. 11</p>  <table border="1" data-bbox="488 395 1086 1002"> <thead> <tr> <th>Country</th> <th>Liters used per kg lint produced</th> </tr> </thead> <tbody> <tr><td>Zimbabwe</td><td>0</td></tr> <tr><td>Zambia</td><td>0</td></tr> <tr><td>Uganda</td><td>0</td></tr> <tr><td>Togo</td><td>0</td></tr> <tr><td>Tanzania</td><td>0</td></tr> <tr><td>Nigeria</td><td>0</td></tr> <tr><td>Mozambique</td><td>0</td></tr> <tr><td>Mali</td><td>0</td></tr> <tr><td>Malawi</td><td>0</td></tr> <tr><td>Ivory Coast</td><td>0</td></tr> <tr><td>Chad</td><td>0</td></tr> <tr><td>Cameroon</td><td>0</td></tr> <tr><td>Benin</td><td>0</td></tr> <tr><td>Colombia</td><td>0</td></tr> <tr><td>Kenya</td><td>0</td></tr> <tr><td>Brazil</td><td>17</td></tr> <tr><td>Bangladesh</td><td>41</td></tr> <tr><td>Myanmar</td><td>44</td></tr> <tr><td>Ethiopia</td><td>62</td></tr> <tr><td>Argentina</td><td>171</td></tr> <tr><td>India</td><td>1237</td></tr> <tr><td>South Africa</td><td>1289</td></tr> <tr><td>USA</td><td>1390</td></tr> <tr><td>China</td><td>1552</td></tr> <tr><td>Australia</td><td>1757</td></tr> <tr><td>World</td><td>1931</td></tr> <tr><td>Mexico</td><td>1997</td></tr> <tr><td>Turkey</td><td>2552</td></tr> <tr><td>Greece</td><td>2563</td></tr> <tr><td>Spain</td><td>2919</td></tr> <tr><td>Kazakhstan</td><td>4374</td></tr> <tr><td>Sudan</td><td>5352</td></tr> <tr><td>Pakistan</td><td>7153</td></tr> <tr><td>Iran</td><td>7184</td></tr> <tr><td>Egypt</td><td>10917</td></tr> <tr><td>Uzbekistan</td><td>11692</td></tr> <tr><td>Turkmenistan</td><td>13696</td></tr> </tbody> </table> <p>OECD SIDE SESSION FEBRUARY 25th 2022 TRANSFORMERS FOUNDATION</p> <p>The amount of irrigated water (blue water) that cotton farmers use varies dramatically, depending on a number of factors, including climate, available rainfall and available groundwater, soil type, rate of evapotranspiration and the availability and efficiency of irrigation systems.⁹² In fact, according to ICAC, there is a 805-fold difference in the amount of irrigation water used in cotton between nations, from Brazil's 17 liters per kilogram of lint to Turkmenistan's 13,696 liters per kilogram.⁹³ The global average, as we've mentioned, is 1,931 liters per kilogram, and with this additional context, you can understand why a global average on cotton's water consumption doesn't reveal much.</p>	Country	Liters used per kg lint produced	Zimbabwe	0	Zambia	0	Uganda	0	Togo	0	Tanzania	0	Nigeria	0	Mozambique	0	Mali	0	Malawi	0	Ivory Coast	0	Chad	0	Cameroon	0	Benin	0	Colombia	0	Kenya	0	Brazil	17	Bangladesh	41	Myanmar	44	Ethiopia	62	Argentina	171	India	1237	South Africa	1289	USA	1390	China	1552	Australia	1757	World	1931	Mexico	1997	Turkey	2552	Greece	2563	Spain	2919	Kazakhstan	4374	Sudan	5352	Pakistan	7153	Iran	7184	Egypt	10917	Uzbekistan	11692	Turkmenistan	13696	
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592	5.4.4; 1382	<p>CREDIBLE DATA VS MISINFORMATION: A lesson in responsible data use and fact checking OECD 2022 2/25 Cotton: A case study in misinformation, Transformers Foundation 12/01/2021 https://www.transformersfoundation.org/s/CottonPaper_120122_TransformersFoundation_.pdf</p>																																																																													
		<p>I would encourage the authors to read this report: https://www.transformersfoundation.org/cotton-report-2021. It is not possible to say that a 1 tonne of textile uses a certain amount of water. Completely without credibility in the fashion sector, so best to remove completely.</p>	<p>Rejected Despite the uncertainties, the general</p>																																																																												

ID	Stated section; stated line	Comment	Answer
			statement is still valid.
593	5.4.4 Water; 1384	Re. the comment "Cotton and hemp are the most water-demanding among the textile fibres" and the table 20 underneath, it should be made clearer what is actually consumed from irrigation, vs what is the intake of the hemp plant from natural rain. Also, the figure seems very high - in Europe, agronomic institute source reports that hemp needs 30 - 40 mm per ton dry hemp plant (while fibre is aprox 20% of hemp plant weight) and most or all of this quantity is brought by rain (depending on the region)	Rejected The authors invite the stakeholder to provide data with references to support their arguments.
594	5.4.4; 1388	We refer again to this report https://www.transformersfoundation.org/cotton-report-2021	Acknowledged
595	5.4.4; 1388-1389, Table 20	<p>The referenced studies must be checked for their reliability. For example, the statement that hemp has a higher water consumption than cotton is contradicted by other studies:</p> <p>Hemp meets fashion and function - 62nd Dornbirn GFC Global Fiber Congress, 13th - 15th 2023 September. Source: https://www.dornbirn-gfc.com/fileadmin/user_upload/Pressrelease__September_2023_Review_en.pdf</p> <p>Industrial hemp fibre: A sustainable and economical alternative to cotton. Article in Journal of Cleaner Production, Vol. 268, 2020 May. Source: https://linkinghub.elsevier.com/retrieve/pii/S0959652620322277</p> <p>Nutzhanf in Deutschland: Übersicht in Zahlen. ELEMENTE – Materialien zur Cannabiswirtschaft. BvCW, Vol. 19, 2022 Dezember. Source: https://cannabiswirtschaft.de/wp-content/uploads/2022/12/ELEMENTE_19_Zahlenwerk_Nutzhanf_V1.3.pdf</p>	Accepted Table 20 was updated
596	5.4.4 page 53 Table 20; 1388-1389	<p>It is worth noting that viscose is the primary representative of man-made cellulosic fibers, being the largest fiber within this group. We would like to understand why man-made cellulosic fibers and viscose are listed as two separate categories in this table. In contrast, in the synthetic fibers section, there is not a division between fossil-based synthetic fibers and polyester.</p> <p>Additionally, we have concerns regarding the water consumption data provided in the table, particularly given the significant difference between the values attributed to man-made cellulosic fibers and viscose. This is especially notable considering</p>	Acknowledged The authors invite the stakeholder to provide data and references

ID	Stated section; stated line	Comment	Answer
		<p>that viscose represents the largest market share (~80%) within the man-made cellulosic fiber group.</p> <p>In general, we have observed that a limited number of studies were selected as references. Given the considerable fluctuation in cotton data, it might be more reliable to present a range rather than an average. Additionally, it would be helpful to understand how the average was calculated, as it may provide a more accurate depiction of the data.</p>	about the consumption of the fibres and groups of fibres in Table 20.
597	5.4.4; 1390-1391	Would be interesting to not only look at water prices paid on the market but also the price if environmental and climate impact were to be internalised.	Acknowledged The environmental and economic assessment in Task 5 will address this topic.
598	5.4.4; 1392-1394	The preparatory study compares the price of water in apparel producing vs consuming countries and suggests that manufacturing of apparel in China and India can be performed with a lower price than in Europe. This is too generalized as the water cost is negligible within the total apparel production cost.	Acknowledged The environmental and economic assessment in Task 5 will address this topic.
599	5.4.4; 1392	<p>It is better to add the note that comparisons based on urban tap water rates are for reference only.</p> <p>Since the price of industrial water is not available, the rate is set at the same rate as the urban tap water rate, but the textile industry has traditionally been located along rivers with abundant water or in locations where underground water is easy to obtain. The situation differs depending on the country and region.</p>	Acknowledged If data are not available, assumptions will be made in Task 5 when the model will be built.
600	5.4.4; 1395	Here it may be slightly confusing to see the tables. Irrigation water and tap water is not the same.	Rejected The aim of Table 21 is described in lines 1392-1394.

8.3 Comments from ID 600 to ID 671

Table 11. Comments on section 5 – Market analysis. From ID 601 to ID 671

ID	Stated section; stated line	Comment	Answer
601	5.5 Market structure and business models; 1398-1481: general comment on the Business Model Fast Fashion	<p>The EU wants to make 'Fast Fashion out of Fashion'. We recommend that the JRC reviews the business model of Fast Fashion and Ultra-Fast Fashion in detail.</p> <p>The fast fashion business models, characterised by their rapid production cycles, trend replication, and low-cost garments, have fundamentally reshaped consumer behaviour and expectations in the fashion industry. However, these models are inherently unsustainable, both environmentally and socially. Fast fashion thrives on the constant churn of new styles and collections, encouraging consumers to buy frequently and discard just as quickly. This relentless pace not only leads to significant environmental degradation through the overuse of natural resources and increased waste but also perpetuates a culture of disposability.</p> <p>Moreover, the ultra-fast fashion segment exacerbates these issues by further shortening production timelines and introducing even more collections per year. This model relies heavily on online platforms and social media to market their rapidly changing inventories, tapping into the consumer's desire for newness and instant gratification. The result is an even greater environmental footprint due to the increased frequency of production cycles and the logistical demands of online shopping, including packaging and transportation.</p> <p>The fast and ultra-fast fashion models not only harm the environment but also have serious social impacts. The push for cheaper, faster production often results in exploitative labour practices, such as unsafe working conditions and unfair wages.</p>	<p>Acknowledged</p> <p>The text was implemented. Business models with relation to product aspects reported in Article 5 of the ESPR are addressed in Task 4.</p>

ID	Stated section; stated line	Comment	Answer
		<p>While durability is commonly suggested as a solution to fast fashion, studies often funded by these brands suggest that low-priced garments can be as durable as medium-priced ones, primarily due to their synthetic fibres. Laboratory durability tests show that for example polyester garments very easily pass the laboratory strength tests. However, simply making clothes more durable clothes doesn't address the core issue: it leads to more waste as the volume of discarded, durable clothes grows. Thus, neither low price indicates poor durability, nor does high price guarantee longevity. Instead, frequent purchases are the real issue, reducing the lifespan of clothing. A better solution, is to look at how low clothing prices and marketing significantly shape consumer behaviour and influence the sustainability challenges of the fashion industry.</p> <p>Low prices reduce the financial barrier to purchasing, leading consumers to make impulse buys without thorough consideration of need or long-term value. This ease of acquisition feeds into a cycle of constant consumption, where the decision to purchase is driven more by the attractiveness of the deal than by a genuine desire or requirement for the item. The immediate gratification of acquiring something new, coupled with the minimal financial investment, can overshadow more mindful consumption practices.</p> <p>When clothes are cheap, they are often perceived as less valuable and, by extension, more disposable. It's important to note that consumers don't always view clothing purchases as replacements; rather, they often compare the cost of repair with the price of a new garment or a similar one. This underscores the complexity of consumer behaviour in relation to clothing value and replacement decisions. As a result, consumers may feel less inclined to take care of their clothes or consider the environmental impact of discarding them, leading to increased waste and a reduced lifespan for each garment.</p> <p>While low prices make fashion more accessible to a broader demographic, providing affordable options for those on tight budgets, this accessibility comes with an environmental cost. The challenge lies in balancing economic accessibility with sustainable production and consumption practices.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Tackling fast fashion's issues needs multifaceted approaches: regulating marketing and the industry to lessen overconsumption, and educating consumers on its economic and environmental costs to promote mindful consumption. We encourage the JRC to review the available peer reviewed literature on the topic.</p> <p>https://www.researchgate.net/publication/346436594_Is_Price_an_Indicator_of_Garment_Durability_and_Longevity</p> <p>https://phys.org/news/2023-07-price.html</p> <p>https://www.innovationintextiles.com/research-development-education/expensive-doesnt-always-mean-durable/</p> <p>Laitala, K., Klepp, I. G., & Løvbak Berg, L. (2024), "The impact of modes of acquisition on clothing lifetimes". https://doi.org/10.1201/9781003044413-8</p> <p>Laitala, K.; Klepp, I.G. What Affects Garment Lifespans? (2020). https://doi.org/10.3390/su12219151</p> <p>Kirsi Laitala and Ingun Grimstad Klepp "Waste audit interviews - A method for understanding the link between intrinsic quality and apparel lifespans." https://clothingresearch.oslomet.no/wp-content/uploads/sites/1026/2024/04/NewMethod.pdf</p>	
602	5.5; 1398	<p>1. Are there figures about the market share of companies applying specific business models?</p> <p>We have no definite figures of such. On a general basis second hand seems to be more trendy in sweden. Especially since second hand can be accesed thru an increasing amount e-commerce sites. Over the last years several renting services have been available but moste of the companies went bankrupt during the pandemic. However - new initiatives and bussiness models like the Gemme Collective have started to pop up.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		The SEPA has put 5 million SEK on research investigating more sustainable business models in the project "QUEST - In search for knowledge, gaps and action on sustainable business models". The final report is about to be published in a short while.	
603	5.5 Market structure and business models; 1402/1403	According to the New Legislative Framework, a new product is placed on the market in the EU by a manufacturer, importer or authorised representative. Instead, retailers and wholesalers make a product available. We recommend clearly distinguishing these two concepts, as they trigger specific obligations and different liability regimes under EU product safety and compliance legislation.	Accepted The text was updated to address both situations.
604	5; 1402-1409	These are assumptions. More appropriate would be to have a look into how many pieces are put on the market (f.e. EPR-approach), instead of wholesale and retailer.	Rejected The data and arguments reported are backed by official datasets and references. The authors invite the stakeholders to provide data and references to the investigation they suggest to perform.
605a	Section 5.5; 1443-1474	The report does not adequately reflect the business model referred to as "ultra-fast fashion". These companies offer up to thousands of new product lines every day, constantly chasing after the latest trends. Ultra-fast fashion brands leverage social media and digital marketing channels to communicate new arrivals and trends in real-time, inducing in consumers the feeling that if you don't buy that new jacket or those sneakers right now, you'll miss out forever. Many ultra-fast fashion brands primarily operate online, allowing them to reach a global audience and minimize overhead costs associated with brick-and-mortar stores. Furthermore, they sell directly to consumers based in the EU, mostly with parcels with a value below EUR 150 for which import duties are not due. Numerous worrying environmental and social concerns have been raised and linked to this business model. Since the vision of the European Commission in the EU Textile Strategy is to make fast fashion out of fashion, it is essential to dedicate special attention to this emerging model and to adopt policies to effectively address the environmental and social concerns linked to these companies.	Acknowledged The text was implemented. Business models with relation to product aspects reported in Article 5 of the ESPR are addressed in Task 4.
605b	Section 5.5; 1443-1474	See the working paper shared by email named "Exploring sufficiency approaches to textiles policy".	Acknowledged
606	5.5; 1443	About general business models: Consumer-led business model & Brand-led business model:	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>over 20 years working experience in different roles within fashion industry has revealed the fact that most fashion businesses are mainly interested in the needs and desires of a customer to boost sales (and therefore secure the future of their business). More importantly some of them are putting huge efforts in marketing to create those needs and cravings that would not necessarily exist otherwise. The 1st milestone of the study indicated that consumers would be able to direct the trends and also businesses with their needs and purchases, when in fact it is the industry that guides consumers with marketing to “consume their way into a better world”. At the same time the actually better alternatives do not yet exist in a large scale and there is not enough comparable information about products and brands. Consumers are individuals and therefore the scale of them as influencers and the massive fashion industry that would need to be changed is unbalanced and cannot work efficiently as an agent of change.</p> <p>> For the ESPR to be effective, it is the aggressive marketing needs to be addressed and limited to ease the pressure and prevent impacts of ever-changing trends. Otherwise efforts on ecodesign might not be as effective as expected.</p>	
607	5.5; 1443	<p>This chapter sounds as if fast fashion has developed solely to satisfy consumer demand/preferences. Does this mean there is clear evidence that the textile industry never pushed shorter fashion cycles based on cheap low-quality products to increase output? And does this mean, there is evidence that the textile industry never pushed new fashion styles in order to incite people to replace their clothes? If there is no such evidence, this paragraph needs re-wording.</p>	<p>Clarified This section describes the different business models that operate on the market. The authors think that there are many actions that business models undertake to promote or go against the 16 sustainable product aspects reported in Article 5 of the ESPR. Specific business models in the context of these product aspects are detailed in Task 4 of the PS.</p>
608	Section 5.5; 1443-1474	<p>The report does not adequately reflect the business model referred to as “ultra-fast fashion”. These companies offer up to thousands of new product lines every day, constantly chasing after the latest trends. Ultra-fast fashion</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
		<p>brands leverage social media and digital marketing channels to communicate new arrivals and trends in real-time, inducing in consumers the feeling that if you don't buy that new jacket or those sneakers right now, you'll miss out forever. Many ultra-fast fashion brands primarily operate online, allowing them to reach a global audience and minimize overhead costs associated with brick-and-mortar stores. Furthermore, they sell directly to consumers based in the EU, mostly with parcels with a value below EUR 150 for which import duties are not due. Numerous worrying environmental and social concerns have been raised and linked to this business model. Since the vision of the European Commission in the EU Textile Strategy is to make fast fashion out of fashion, it is essential to dedicate special attention to this emerging model and to adopt policies to effectively address the environmental and social concerns linked to these companies.</p>	<p>The text was implemented. Business models with relation to product aspects reported in Article 5 of the ESPR are addressed in Task 4.</p>
609	5.5; 1443-1464	<p>Textile and apparel certified to GOTS fits well into meeting the symbolic and aesthetic values as well as the tangible qualities associated with organic fibre production and organic processing. GOTS products have high 'emotional' quality. They are not seen as 'fast fashion' and will be saved and savoured. Children's and baby/infant clothes will be passed on to siblings or friends for their children and babies as cherished items.</p> <p>A GOTS consumer focused campaign #BehindTheSeams, reached >40 million impressions and >21 million unique consumers in 2023.</p> <p>Consumer attitudes towards GOTS, sustainability and ethically produced textiles underscore the growing consumer awareness and demand for sustainably produced textiles, highlighting the value proposition that GOTS certification offers to companies seeking to align their efforts with consumer preferences and market trends.:</p> <p>Increased Business Opportunities:</p> <p>66% of survey respondents (Survey among GOTS certified entities) reported that GOTS certification offered them an increase in business opportunities in 2023.</p> <p>Consumer Demand for Ethical Production:</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
		<p>According to research by Censuswide in 2023, a substantial 66.17% of all consumers expressed a desire for more of their textiles to be ethically and sustainably produced.</p> <p>Accessibility of Sustainable Products:</p> <p>Censuswide's 2023 research also revealed that only 36% of consumers find it easy to locate sustainable and ethically crafted textile products, indicating a gap in the market that GOTS certification can help address.</p> <p>Importance of Fair Production:</p> <p>The same study showed that 59% of consumers expressed the importance of knowing that every stage of a product's production is fair for the workers involved and environmentally friendly.</p> <p>Trust in Verified Claims:</p> <p>Censuswide's 2023 findings indicated that nearly 60% (59.9%) of consumers place greater trust in independently verified claims over a brand's self-proclaimed environmental and social responsibility.</p> <p>Among the four best known certificates, GOTS is rated top in almost all criteria.</p>	
610	5.5; Question Are there figures about the market share of companies applying specific	<p>In the report, the business model of fashion brands and retailers are focused without mentioning the organization of supplier companies. Although it is difficult to give market shares, the sourcing companies also outsource their production to Tier2 companies and ateliers.</p> <p>Another missing business model is the design offices and their way of doing fashion business.</p>	<p>Acknowledged</p> <p>The authors invite the stakeholder to provide data and references to report about design offices.</p>

ID	Stated section; stated line	Comment	Answer
	business models?		
611	5.5; 1446-1450	[...] misses a deeper analysis of the fast fashion business model which have moved from seasonal collections to weekly collections. The current analysis implies that consumer changes in tastes and demands dictate the change of collections marketed by companies. This analysis mainly blames consumers for the rapid change of collections, whereas major brands are behind the choice the fast fashion business model which heavily relies on overproduction, intensive marketing and cheap prices.	Acknowledged The text was implemented. Business models with relation to product aspects reported in Article 5 of the ESPR are addressed in Task 4.
612	5.5.; 1447-1456	<p>The report refers to symbolic and aesthetic values as intangibles and indicates that the latter change rapidly. It also states that companies react to these changes in consumer tastes and demands. We do not agree with this interpretation. Framing the issue in this way disproportionately places the responsibility and need for change on consumers. Overconsumption does not occur in a vacuum; Overproduction and overconsumption are two sides of the same coin, and it is essential to acknowledge that the dominant business model of the underregulated textile sector relies on overproduction and is actively encouraging, enabling, and benefitting from unsustainable consumption patterns.</p> <p>An average consumer now buys 60% more clothes than in 2000 but wears them half as long. The sale of clothes has also grown faster than world GDP. (https://changingmarkets.org/report/new-look-for-the-fashion-industry-eu-textile-strategy-crucial-role-extended-producer-responsibility-epr/). This underscores that consumption is not driven by necessity but by overproduction from brands.</p> <p>In terms of basic needs satisfaction, there is no reason to continue to produce more. The demand, therefore, is driven not by the “needs” but by “wants”, or “desires”, which are created by marketing and advertising industries at scale (UNEP (2023). The Sustainable Fashion Communication Playbook). As such, essentially, supply drives the demand for more clothes, footwear and accessories.</p>	Acknowledged The text was implemented. Business models with relation to product aspects reported in Article 5 of the ESPR are addressed in Task 4.
613	Section 5.5; 1447-1450	The report refers to symbolic and aesthetic values as intangibles and indicates that the latter change rapidly. It also states that companies react to these changes in consumer tastes and demands. We do not agree with this interpretation. Framing the issue in this way disproportionately places the responsibility and need for change on consumers. Overconsumption does not occur in a vacuum; systems of provisioning enable an intensified material throughput of garments through people’s wardrobes. Overproduction and overconsumption are two sides of the same coin, and it is essential to acknowledge that the dominant business model of the underregulated textile	Acknowledged The text was implemented. Business models with relation to product aspects reported in

ID	Stated section; stated line	Comment	Answer
		<p>sector relies on overproduction and is actively encouraging, enabling, and benefitting from unsustainable consumption patterns.</p> <p>At least three fundamental enablers of overconsumption can be identified across the global fashion system: 24/7 marketing and sales; gambling on consumer demand; and artificially low retail prices.</p> <p>Clothing satisfies some of the more basic, fundamental human needs, like protection from harsh weather conditions, which explains some of the demand. However, with an estimated 80-150 billion garments produced each year (Chan, E. (2023). Billions Of Clothes Are Produced Every Year. Why Do We Still Not Know Exactly How Many? Vogue UK, 24-NOV-2023), enough clothes have been made to dress the global population for several generations to come. In terms of basic needs satisfaction, there is no reason to continue to produce more. The demand, therefore, is driven not by the “needs” but by “wants”, or “desires”, which are created by marketing and advertising industries at scale (UNEP (2023). The Sustainable Fashion Communication Playbook). As such, essentially, supply drives the demand for more clothes, footwear and accessories.</p> <p>Trends have long been the driver of fashion consumption but never has the reach of the brands’ marketing and advertising been as profound as in the current digital age. In physical and digital environments, consumers are pushed to buy more clothes, shoes, and accessories 24/7. Furthermore, free returns largely enable impulse purchases. Since it is not possible in most cases to touch or try on a garment before buying it from online-only retail platforms, more consumers order the same model in multiple sizes/colours to return the garments that do not fit. Return rates for online purchases of clothes have skyrocketed, reaching 24.4% in the USA (Coresight (2023). The True Cost of Apparel Returns: Alarming Return Rates Require Loss-Minimization Solutions). Recent research suggests, however, that 23%-46% of new products returned never reach another consumer (Makov, T., et al. (2023). The Hidden Environmental Costs of Consumer Product Returns, PREPRINT).</p> <p>Clothing and footwear brands routinely produce more than they intend to sell. Overproduction is fuelled by the opportunistic practices of brands who rely on trends’ predictions and essentially gamble on what is going to sell</p>	<p>Article 5 of the ESPR are addressed in Task 4.</p>

ID	Stated section; stated line	Comment	Answer
		<p>next season. With a sell-through rate of 50% considered “normal” by the industry (UNEP (2023). The Sustainable Fashion Communication Playbook), brands, including sport, luxury, and high-end segments, routinely over-order and then destroy unsold merchandise to not decrease the value of their products (Lee, G. (2023). Explainer: Why fast fashion brands destroy unsold clothes. Eco-Business News, May 30 2023). Due to a widespread lack of transparency - these brands consider information on unsold merchandise “sensitive” - there is currently not enough evidence to even estimate what percentage of clothing and footwear items are unsold.</p> <p>Clothes, shoes, and accessories used to cost 14% of a household budget in the beginning of the 20th century (U.S. Bureau of Labour Statistics (2006). 100 Years of Consumer Spending), while today, expenditure on clothes is at a historically low 4% (Eurostat (2021). Household expenditure by category, European Union, 2021 (as % of total expenditure)). Coupled with the increase of number of units produced (Ellen MacArthur Foundation (2017). A new textiles economy: redesigning fashion’s future), this drop in spending means that consumers today buy much more textile products than before, while paying much less for them. Artificially low prices had a detrimental effect on consumers’ perception of clothing value, acquisition, care, and disposal practices – leading to the emergence of “disposable fashion” mentality. Companies offer cheaper and cheaper products to consumers, but the social conditions and environmental consequences under which these textile products are manufactured are not always transparent and relayed to consumers and civil society. Essentially, the ever-dropping prices are the result of externalizing environmental and social costs of production and disposal.</p>	
614	Section 5.5; 1447-1450	<p>The report refers to symbolic and aesthetic values as intangibles and indicates that the latter change rapidly. It also states that companies react to these changes in consumer tastes and demands. We do not agree with this interpretation. Framing the issue in this way disproportionately places the responsibility and need for change on consumers. Overconsumption does not occur in a vacuum; systems of provisioning enable an intensified material throughput of garments through people’s wardrobes. Overproduction and overconsumption are two sides of the same coin, and it is essential to acknowledge that the dominant business model of the underregulated textile sector relies on overproduction and is actively encouraging, enabling, and benefitting from unsustainable consumption patterns.</p> <p>At least three fundamental enablers of overconsumption can be identified across the global fashion system: 24/7 marketing and sales; gambling on consumer demand; and artificially low retail prices.</p>	<p>Acknowledged The text was implemented. Business models with relation to product aspects reported in Article 5 of the ESPR are addressed in Task 4.</p>

ID	Stated section; stated line	Comment	Answer
		<p>Clothing satisfies some of the more basic, fundamental human needs, like protection from harsh weather conditions, which explains some of the demand. However, with an estimated 80-150 billion garments produced each year (Chan, E. (2023). Billions Of Clothes Are Produced Every Year. Why Do We Still Not Know Exactly How Many? Vogue UK, 24-NOV-2023), enough clothes have been made to dress the global population for several generations to come. In terms of basic needs satisfaction, there is no reason to continue to produce more. The demand, therefore, is driven not by the “needs” but by “wants”, or “desires”, which are created by marketing and advertising industries at scale (UNEP (2023). The Sustainable Fashion Communication Playbook). As such, essentially, supply drives the demand for more clothes, footwear and accessories.</p> <p>Trends have long been the driver of fashion consumption but never has the reach of the brands’ marketing and advertising been as profound as in the current digital age. In physical and digital environments, consumers are pushed to buy more clothes, shoes, and accessories 24/7. Furthermore, free returns largely enable impulse purchases. Since it is not possible in most cases to touch or try on a garment before buying it from online-only retail platforms, more consumers order the same model in multiple sizes/colours to return the garments that do not fit. Return rates for online purchases of clothes have skyrocketed, reaching 24.4% in the USA (Coresight (2023). The True Cost of Apparel Returns: Alarming Return Rates Require Loss-Minimization Solutions). Recent research suggests, however, that 23%-46% of new products returned never reach another consumer (Makov, T., et al. (2023). The Hidden Environmental Costs of Consumer Product Returns, PREPRINT).</p> <p>Clothing and footwear brands routinely produce more than they intend to sell. Overproduction is fuelled by the opportunistic practices of brands who rely on trends’ predictions and essentially gamble on what is going to sell next season. With a sell-through rate of 50% considered “normal” by the industry (UNEP (2023). The Sustainable Fashion Communication Playbook), brands, including sport, luxury, and high-end segments, routinely over-order and then destroy unsold merchandise to not decrease the value of their products (Lee, G. (2023). Explainer: Why fast fashion brands destroy unsold clothes. Eco-Business News, May 30 2023). Due to a widespread lack of transparency - these brands consider information on unsold merchandise “sensitive” - there is currently not enough evidence to even estimate what percentage of clothing and footwear items are unsold.</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Clothes, shoes, and accessories used to cost 14% of a household budget in the beginning of the 20th century (U.S. Bureau of Labour Statistics (2006). 100 Years of Consumer Spending), while today, expenditure on clothes is at a historically low 4% (Eurostat (2021). Household expenditure by category, European Union, 2021 (as % of total expenditure)). Coupled with the increase of number of units produced (Ellen MacArthur Foundation (2017). A new textiles economy: redesigning fashion's future), this drop in spending means that consumers today buy much more textile products than before, while paying much less for them. Artificially low prices had a detrimental effect on consumers' perception of clothing value, acquisition, care, and disposal practices – leading to the emergence of “disposable fashion” mentality. Companies offer cheaper and cheaper products to consumers, but the social conditions and environmental consequences under which these textile products are manufactured are not always transparent and relayed to consumers and civil society. Essentially, the ever-dropping prices are the result of externalizing environmental and social costs of production and disposal.</p>	
615	5.5; 1465	<p>Here, the incredible rise of "ultra-fast-fashion" as a business model should be included. The best-known examples of this trend are Chinese giants Shein and Temu, which have already risen to the top 5 of garment retailers.</p> <p>This trend also affects a few other locations in the document, like line number 1515 on seasonality: in ultra-fast-fashion, there are thousands of new products introduced per day.</p> <p>And line number 1450 on outsourcing: these new players use a different outsourcing model, relying on a vast and digitally-connected network of micro-enterprises, at the moment mostly in China but expanding now to Turkey, Brazil and Mexico.</p> <p>It also aspects section 6.2.1 (line number 1669) with a marketing strategy that is almost exclusively geared towards young consumers (12-18 age range), using Tiktok as a main channel, and the use of phone apps.</p>	<p>Acknowledged The text was implemented. Business models with relation to product aspects reported in Article 5 of the ESPR are addressed in Task 4.</p>
616	5.5; 1471-1474	<p>The preliminary study rightly highlights the increase of e-sales until 2020. It could further integrate Eurostat data published by the EEA in its report “The destruction of returned and unsold textiles in Europe’s circular economy”, showing a steady increase in the percentage of individuals who purchased clothes and shoes online between 2020 and 2022.</p>	<p>Accepted The text was updated</p>

ID	Stated section; stated line	Comment	Answer
617	5.5 Market structure and business models; 1471/1472	<p>In 2022, textiles, more precisely "clothes, shoes or accessories", were the online most purchased product category (Lone, S., & Weltevreden, J.W.J. (2023). 2023 European E-commerce Report. Amsterdam/Brussels: Amsterdam University of Applied Sciences & Ecommerce Europe). According to different sources (Fraunhofer-Institut für System- und Innovationsforschung ISI, 2023, Studie zur Oekologischen Nachhaltigkeit des Onlinehandels in Deutschland (OeNO-Studie); Shopping tomorrow, Thuiswinkel.org, Get Rid of Returns), this product category is also the most affected by consumer returns.</p> <p>In e-commerce, various business models and sales channels based on different distribution chains co-exist and overlap. For instance:</p> <ul style="list-style-type: none"> • Webshops or e-retailers, offering their products via their own online interface, assimilated in EU legislation to economic operators, such as distributors or dealers. • Third party online marketplaces, providers of an intermediary service using an online interface which allows customers to conclude distance contracts with economic operators. • E-retailers can also own an online marketplace, thus allowing third party sellers to offer their products through their online interface. <p>Recognising the distinction and synergies between these business models is key to understand the different logistic chains, involving different players who have unequal levels of knowledge with regards to the finished products offered for sale on an online interface. The EU law acknowledges these differences and provides appropriate legal definitions accordingly.</p>	Acknowledged
618	5; 1471-1474	The data on e-sales is from 2009, very outdated. Even the increase data included from 2020 is also outdated.	Acknowledged The text was updated
619	5.5; 1475	Are there any figures on the Second-hand and rental markets in the EU?	Acknowledged The JRC found limited information about this topic. For this reason, JRC asked about it during the online meeting. The authors

ID	Stated section; stated line	Comment	Answer
			invite the stakeholder to provide data and references if these are available.
620	Answer to question 2 from the first online stakeholder consultation (19th March 2024); Are there EU figures about second-hand, rental market and e-commerce?	<p>RREUSE would like to draw the JRC's attention to the impact of RREUSE's network, which provides figures about the textile second-hand market: https://rreuse.org/wp-content/uploads/2023/11/rreuse-member-impact-2022-1.pdf</p> <p>In 2022, more than half of RREUSE's 35 members were active in the collection, sorting, and reuse of used and waste textiles. Together, RREUSE members collect 360,000 tonnes of textiles annually, of which more than 14% (52,000 tonnes) is reused locally. The impact of RREUSE members also includes figures on the job creation potential of the social economy in the collection, sorting, and reuse of textiles: a social enterprise creates between 20 and 35 jobs per 1,000 tonnes of textile waste collected. Finally, the RREUSE network comprises 2,400 second-hand stores across the EU and beyond.</p>	Accepted Figures were included in the text.
621	5.5; 1475	<p>The section on second hand and rental markets deserves more space in the report. These are the future markets and we need to know more about them.</p> <p>2. Are there EU figures on second hand, rental market and e-commerce?</p> <p>No figures on markets shares but a report on geographic differences in acceptance of alternative businessmodels as rental, leasing, swapping, repair services etc. Parametres that are of great importance if to promote changing behavior: http://mistrafuturefashion.com/wp-content/uploads/2018/05/Mistra-Future-Fashion-Report-3.1.2.1.pdf. According to Swedish Commerce's (the business and employers' association) pre-loved indicator second hand is increasing and had a turnover of 417 miljon SEK (february 2024). The share of consumers buying second hand fashion was estimated to 14%. The report contains a monthly timeline from october 2023 - february 2024.</p> <p>https://www.svenskhandel.se/api/documents/pre-loved-februari-2024.pdf</p>	Acknowledged The authors can't access the link shared. The stakeholder is invited to provide more information in the next consultation.
622	5.5 Market structure and business	Another barrier is the still limited adaptation of the EU regulatory framework to this market, which has mostly a global dimension and is based on more complex distribution and value chains than the traditional ones.	Acknowledged

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	models; 1479-1481		
623	5.5; 1479	<p>There are some more concerns on the products rather than authenticity of the brand (no fake) but quality assurance and its assurer.</p> <p>With the introduction of DPP in ESPR, this should be the reason behind the consideration of making original product information and seller (company) information compulsory for each resale product.</p>	Acknowledged
624	5.6. Characteristics of the value chain; 1482- 1532	<p>Important addition to section: The textile industry presents one of the largest sectors in the world, characterised by continuous economic growth and highly competitive structures. It is important to take into account the global character of the textile value chain where the different stages and tiers take place across an array of different locations.</p> <p>1515: “Over the last decades, the number of seasons has been drastically increasing from two per year to almost one per week “.</p> <p>Here, the report make it seem like it is the modus operandi for the industry, which is – to our understanding – not the case from an overall perspective.</p> <p>If stated so explicitly, it should be based on actual numbers for the industry rather than unbacked articles and one company’s way of working. This would probably also be depending on how you define a collection?</p>	<p>Clarifications needed from the stakeholder</p> <p>The authors do not understand the point and argument of the stakeholder. The authors invite the stakeholder to clarify the comment in the next consultation.</p>
625	5.6; 1482- 1532	<p>The textile industry presents one of the largest sectors in the world, characterised by continuous economic growth and highly competitive structures. It is important to take into account the global character of the textile value chain where the different stages and tiers take place across an array of different locations.</p> <p>The textiles market is itself very fragmented, as no brand or retailer owns more than 2% of the market value. It is also important that the textile and clothing industry has become a key sector of the economy in many developing</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>countries, with some 60 to 75 million people employed across the supply chain, 80% of whom are women. It also plays a major role in the economy of many Asian countries. In Bangladesh and Cambodia for example, it generates around 80 per cent of all export earnings, in Pakistan over 50 per cent, and is also one of the key contributors to the GDP.</p> <p>When introducing the specific requirements for the textile industry, it is essential to take this global character into account, notably when it comes to energy requirements, recycling technologies and their location, the collection of waste, the fibre availability, and the need for targeted and specific R&D coupled with continuous engagement and dialogue with producing countries and all actors in the value chain, notably fabric and garment manufacturers.</p>	
626	5.6; 1482-1532	<ul style="list-style-type: none"> - Important additional perspective: The textile industry presents one of the largest sectors in the world, characterised by continuous economic growth and highly competitive structures. It is important to take into account the global character of the textile value chain where the different stages and tiers take place across an array of different locations. - The textiles market is itself very fragmented, as no brand or retailer owns more than 2% of the market value . It is also important that the textile and clothing industry has become a key sector of the economy in many developing countries, with some 60 to 75 million people employed across the supply chain, 80% of whom are women. It also plays a major role in the economy of many Asian countries. In Bangladesh and Cambodia for example, it generates around 80 per cent of all export earnings, in Pakistan over 50 per cent , and is also one of the key contributors to the GDP. - When introducing the specific requirements for the textile industry, it is essential to take this global character into account, notably when it comes to energy requirements, recycling technologies and their location, the collection of waste, the fibre availability, and the need for targeted and specific R&D coupled with continuous engagement and dialogue with producing countries and all actors in the value chain, notably fabric and garment manufacturers. - https://fashionforgood.com/wp-content/uploads/2019/10/FashionForGood_Investing-in-Textile-Innovation_October.pdf - https://www.giz.de/en/worldwide/86435.html - https://www.giz.de/en/downloads/giz2021-en-promoting-sustainability-textile-industry.pdf 	Acknowledged

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627	5.6; 1482-1532	<p>The textile industry presents one of the largest sectors in the world, characterised by continuous economic growth and highly competitive structures. It is important to take into account the global character of the textile value chain where the different stages and tiers take place across an array of different locations. The location of the different stages is due to different factors, one of them is the one highlighted in the JRC chapters on lower production costs, but also the proximity in the production of raw materials, the necessary infrastructure to transform the materials and fibres or the investments that take place in a country for the development of the different sectors.</p> <p>The textiles market is itself very fragmented, as no brand or retailer owns more than 2% of the market value (https://fashionforgood.com/wp-content/uploads/2019/10/FashionForGood_Investing-in-Textile-Innovation_October.pdf). It is also important to underline that the textile and clothing industry has become a key sector of the economy in many developing countries, with some 60 to 75 million people employed (https://www.giz.de/en/worldwide/86435.html) across the supply chain, 80% of whom are women. It also plays a major role in the economy of many Asian countries. In Bangladesh and Cambodia for example, it generates around 80 per cent of all export earnings, in Pakistan over 50 per cent (https://www.giz.de/en/downloads/giz2021-en-promoting-sustainability-textile-industry.pdf), and hence is one of the key contributors to its GDP.</p> <p>When introducing the specific requirements for the textile industry, it is essential to take this global character into account, notably when it comes to energy requirements, recycling technologies and their location, the collection of waste, the fibre availability, and the need for targeted and specific R&D coupled with continuous engagement and dialogue with producing countries and all actors in the value chain, notably fabric and garment manufacturers.</p>	Acknowledged
628	5.6; 1485-1499	<p>The PS should highlight the way in which GOTS has Value Chain Characteristics that cover the first part of the value chain nodes - from the "raw material for fibre production until retailing, when the product is placed on the market for the first time".</p> <p>Certification to GOTS covers the whole supply textile processing chain from raw fibre (e.g. entering the cotton gin or wool scourer), which must come from a certified organic farm. Thus, unlike the situation described in this section, economic operators do know the processes, materials and chemicals used: Each intermediate company is certified,</p>	Acknowledged

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		<p>with a Scope Certificate (detailing the operations for which they are certified, e.g. spinning, weaving, wet processing, CMT, wholesaling, trading) and a Transaction Certificate (detailing the goods and the quantity traded, between each operator).</p> <p>This provides a guarantee of the traceability of the material throughout the supply chain, supported by independent inspection by GOTS' approved Certification Bodies.</p>	
629	5.6; 1488	Please clarify that "use" includes usage of both first user and the subsequent user	Accepted The text was updated.
630	5.6; 1493	Again more as a question: If the traceability and transparency is desired, how the criteria is considered to trace the origin and ESG minimal safeguards control, within outside EU material flows which may not have traceability in place? Will the guarantee be sought similarly for recycled and virgin materials?	Rejected This section describes the current situation of the value chain. Requirements will be proposed later in the development of the PS.
631	5.6 Characteristics of the value chain; 1496	An exemple for this "Although there are specific countries producing specific fibres" is Flax-linen, where 3/4 of world production is from western-Europe (France, Belgium and the Netherlands)	Acknowledged
632	5.6; 1500 - 1502	As the first part of the value chain (the main production stages), and both the post-consumer textile waste treatment market and the second-hand market (reuse) occur outside the EU, the development of minimum criteria for textile products in the ESPR should take into account that the manufacturing origin and the end-of-life processes are spread across countries mostly in Asia and Africa due to lower environmental compliance costs and cheaper labour costs. For this reason production countries should be considered as equal partners and be explicitly asked to join the ongoing discussion.	Acknowledged
633	5.6; 1504-1505	Please provide more explanation to why production costs are low. It is most likely due to poor working conditions which is important to keep in mind. Even if the ESPR raise the level of environmental regulation, it is not certain this	Rejected The environmental and economic assessment

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		will have an affect on fast fashion as the labour cost are a high share of production costs, rather than the cost of environmental regulation.	will investigate on the reasons. Section 5.7 already addressees the differences in the compliance of environmental costs.
634	5.6 Characteristics of the value chain; 1510	The Flax-linen sector already started re_shoring with 2 new linen spinning mills in France starting producing in 2022 and more linen spinning mills are in project (1 more and France and 2 in Portugal)	Acknowledged
635	Section 5.6; 1513-1516	<p>We really appreciate that the JRC highlighted in the preliminary study that the yearly number of collections has been drastically increasing. We are seriously worried reading in footnote 92 that a global company updates their collection weekly and puts the responsibility for such choice on customers. We would like to strongly reaffirm that in the case of textiles, it is the supply that drives the demand and not the other way around. Consumers do not request more collections; it is companies that create the desire for unnecessary clothes. It is essential to acknowledge that the dominant business model of the underregulated textile sector relies on overproduction and is actively encouraging, enabling, and benefitting from unsustainable consumption patterns.</p> <p>As mentioned in previous comments, at least three fundamental enablers of overconsumption can be identified across the global fashion system: 24/7 marketing and sales; gambling on consumer demand; and artificially low retail prices. We encourage the JRC to reflect this reality in the preliminary study and to consider the possibility of setting ecodesign requirements to limit such practices.</p>	Acknowledged
636	Section 5.6; 1513-1516	<p>We really appreciate that the JRC highlighted in the preliminary study that the yearly number of collections has been drastically increasing. We are seriously worried reading in footnote 92 that a global company updates their collection weekly and puts the responsibility for such choice on customers. We would like to strongly reaffirm that in the case of textiles, it is the supply that drives the demand and not the other way around. Consumers do not request more collections; it is companies that create the desire for unnecessary clothes. It is essential to acknowledge that the dominant business model of the underregulated textile sector relies on overproduction and is actively encouraging, enabling, and benefitting from unsustainable consumption patterns.</p>	Acknowledged

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		As mentioned in previous comments, at least three fundamental enablers of overconsumption can be identified across the global fashion system: 24/7 marketing and sales; gambling on consumer demand; and artificially low retail prices. We encourage the JRC to reflect this reality in the preliminary study and to consider the possibility of setting ecodesign requirements to limit such practices.	
637	5.6.; 1517	Line 1517, This statement is one of the critical drivers of the market and one of the biggest factors that can effect the change in industry dynamics. It must be considered for all recommendations.	Acknowledged
638	5.6 Characteristics of the value chain; 1520	<p>In addition, there are smaller initiatives within the textiles sector looking specifically at the traceability of chemicals. This aspect is not covered by the cited UNECE project. However, it has to be acknowledged in the preparatory phase that major textile players (including Inditex, H&M...) are working on this topic and are convinced that the ESPR has to play a crucial role by providing strong incentives towards traceability along the supply chains.</p> <p>In current textile sector chemicals management approaches, the buyer (e.g. the brand) usually compiles a Restricted Substance List (RSL) and requires suppliers to declare that listed substances are not present in a supplied mixture or material. (M)RSLs need to be updated frequently depending on the regulatory development. In addition, presuming accuracy of statements of conformity, perhaps substantiated by chemical tests, these statements refer to the articles' properties upon the date of delivery and thus refer only to the substances listed on a (M)RSL by this date. It follows that with every update of the regulatory lists, and the (M)RSL respectively, the compliance declaration is outdated. An additional declaration taking into account the newly added substances is then required.</p> <p>Addressing this highly ineffective and inefficient chemicals management paradigm was the starting point of a project (2015-2018) at the UAS Darmstadt in cooperation with German textile actors (e.g. Vaude, Tchibo) and suppliers of speciality chemistry (e.g. special branch association of chemical suppliers TEGEWA), funded by the German Federal Environment Foundation (DBU).</p> <p>In the project, the supply chain actors found that innovations in the direction of sustainable chemistry could only emerge if brands are able to actively manage SoC in their supply chains, that is, they must know what substances are used in the articles and process steps (i.e. for every production batch), so they can take action with a view to SoC substitution and can identify related research needs. Hence, one central driver for sustainable textile business models is traceability and related chemical management instruments. Certification systems (Ökotex, Blusign etc), in contrast, are of little help in this respect as their risk-based assessments, taking into account, for example, the likelihood of SoC presence in materials and the actual risk of humans and environment due to exposure to these substances, are remarkably untransparent. With respect to enhancing traceability and knowledge, in today's textile chains, there is a lack of information technology (IT) tools facilitating the exchange of information. The textile actors involved in the study flagged the need for a system where suppliers along the supply chains provide data on</p>	Acknowledged

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		<p>all substances used in articles (and the manufacturing process) that is not only SoC because this would allow brands to control compliance of their articles also in terms of future regulations ('beyond compliance') and would put them into the position to satisfy consumer information needs and thus to access related market opportunities.</p> <p>There is no standard definition for traceability of chemicals, but, it usually means the full declaration along the supply chains of materials present in the (part-) articles down to basic substance level (reported by weight of the material). By consolidating all data, a bill of materials is created, frequently deploying a structure-tree to display material data and thereby allowing for full traceability of substances of all components of an article, for example, from semifinished article (e.g. garment fabric), further processed component (e.g. water-repellent coating), to incorporation in the final article.</p> <p>Concept paper: https://www.sciencedirect.com/science/article/abs/pii/S2452223619300161?via%3Dihub</p> <p>Full study in German: https://www.sofia-darmstadt.de/fileadmin/Dokumente/Studien/2019/sofia_studien_2019-01_Kleihauer.pdf</p> <p>English summary paper: https://www.elni.org/elni/elni-review/archive/elni-2019-kleihauer-lennartz</p> <p>Building on this project, the EU Interreg project "Enable Digital Product Passports with Chemicals Traceability for a Circular Economy" (ECHT) (2023-2026) aims to empower actors of the textile circular value chains to implement chemical traceability. The project lead by UAS Darmstadt with many partners from industry (i.a. H&M, PUMA, Inditex, Lacoste) develops and implements the first traceability strategy with action plans for the value chains and policymakers at different levels.</p> <p>Starting point of this project is the expectation of an ESPR delegated act on textiles that sets ambitious standards for chemicals as this would foster sector efforts to develop traceability schemes. The delegated act should ban the most harmful substances from uses in textiles and requiring transparency on the full list of SoC provided for in Article 2(28) ESPR.</p> <p>See https://echt.nweurope.eu/</p>	
639	5.6; 1520-1522	<p>The GOTS certification scheme, and its associated unique transparency features (e.g. the GOTS Public Database https://global-standard.org/find-suppliers-shops-and-inputs/certified-suppliers/database/search</p> <p>- which allows a consumer or trade buyer to check and verify the unique certification number on the mandatory label of the product), is an initiative that meets the objectives of the United Nations Economic Commission for</p>	Acknowledged

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		<p>Europe (UNECE) for an international framework initiative to enhance transparency and traceability for sustainable value chains in the garment industry.</p> <p>From the business point of view, GOTS supports responsible business conduct in relation to the requirements of recognised international frameworks, in particular the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Due Diligence Guidance for Responsible Business Conduct and, most notably, the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector¹. It outlines a comprehensive six-step due diligence process that enables Certified Entities to integrate responsible business practices, conduct thorough risk assessments, develop strategies to prevent and mitigate harm, track their implementation, communicate their efforts, and establish channels for remediation.</p> <p>This aligns with ongoing regulatory developments requiring greater respect for human rights and the environment in business operations, such as Germany's Supply Chain Act, France's Vigilance Act, Norway's Transparency Act and forthcoming EU regulations such as the EU Due Diligence and the Green Claims Directive. Respect for human rights, social justice and environmental integrity is the cornerstone of the due diligence requirements of GOTS 7.0. These requirements emphasise the sector-specific risks inherent in textile supply chains, as delineated in the GOTS Chemical Input Criteria, Environmental Criteria, Human Rights and Social Criteria, and Governance Criteria, thus facilitating effective due diligence processes by Certified Entities.</p>	

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		<p>These processes and the associated procedures are described in the GOTS Due Diligence Handbook for Certified Entities (September 2023). https://global-standard.org/images/resource-library/documents/GOTS_Due_Diligence_Handbook_for_Certified_Entities_10.pdf</p> <p>Three further initiatives are under development by GOTS that are pertinent to the transparency and traceability afforded by GOTS:</p> <ol style="list-style-type: none"> 1. Global Trace Base (GTB): GOTS is in the process of development of the GTB, a central database that will track the origin of organic cotton and other organic materials. It will cover the entire chain of custody, from the first processing steps to the final products, including country or region of origin of the certified raw fibre material, as well as volume reconciliation. This will help GOTS to ensure that fraud within the textile value chain is increasingly difficult to engage in and easier to detect. 2. Farm-to-Gin Registry: This has been implemented in India and is under continued development during 2023-24. It will collect organic raw cotton data, including on Genetically Modified and stable isotope analysis. The harvest details are collected from the farm and the details of the gin are also collected and this will ensure that input material is duly registered prior to issuing the Transaction Certificate. 3. Remote sensing of cotton fields: GOTS is working with the European Space Agency (ESA) and Marple GmbH (a German software development firm) to differentiate cotton fields from other crops using remote assessment, and is using Artificial Intelligence to use satellite data to detect whether cotton fields are managed using organic methods. Remote monitoring will allow GOTS to deter fraud and identify risks, such as the proximity to Genetically Modified (GM) cotton, which is prohibited in organic farm production. 	

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		These four unique features could be specifically referred to in the PS, the fact that there is a need identified in the PS, which is met to a large extent by GOTS, is highly relevant.	
640	5.6 Characteristics of the value chain; 1523-1525	<p>It is important to reflect on upcoming changes in waste management of textiles with the application of separate collection for textile in the EU as of January 2025, and further changes proposed as part of the revision of the Waste Framework Directive. Significant changes to the value chain for second-hand textile and textile waste can be expected, with longer value retention and new opportunities at various level of the waste hierarchy (better sorting, higher quality recycling etc.).</p> <p>There are still remaining barriers to the circulation of used textile and secondary raw textile material within the EU (because of their qualification as “waste” for instance) which could be addressed to unlock further opportunities and reduce extra-EU exports.</p>	Acknowledged
641	5.7; 1533-1568	<ul style="list-style-type: none"> - Additional element for consideration: The textile industry is a key industry for several economies around the world. Several research papers have highlighted that this industry is contributing to the GDP growth and it is generating income for economies that are classified as developing countries according to the United Nations. - The industry does not, in any way, benefit from low legal standards in the production countries. While we could argue that there are differences in legal standards between the European Union and developing economies, it is quite visible that some of the countries where the textile industry is a high contributor to the GDP already have very strict legal standards, on environment for instance. We would all benefit from higher and comparable legal standards, this would be levelling the playing field. - The industry is often at the forefront of advocacy to increase legal standards so that these are at the same level as international conventions, as a minimum. There are clear cases where the industry is succeeding in raising legal standards in production countries. As a couple of examples, the industry is at the forefront of the advocacy to establish higher legal standards when it comes to the Employment Injury scheme in Bangladesh or the social security legislation in Indonesia. - For the industry, it is key to be able to rely on high legal standards and solid mechanisms for national authorities to enforce; to move forward from voluntary standards that leave margins for interpretation, create disparities and leave too much a role of enforcement on international brands. 	Acknowledged

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642	5.7; Question Are there BREF for Bangladesh, Türkiye, Pakistan and Vietnam? Can you provide the references of legislation affecting the textile industry in these countries? Are there any studies about them?	In Türkiye, the BREFs of the EU are used to guide the industry. There are some planned actions in this area, and it is expected to have a sectoral BREF for Turkish apparel industry in the coming years.	Acknowledged
643	5.7; 1533	EU policies should also promote higher environmental standards at a global level. However, currently for example EU Deforestation Regulation (EUDR) and Carbon Boarder Adjustment Mechanism (CBAM) are excluding textile products from their scopes.	Acknowledged
644	5.7; 1534-1538, and 1542-1544, and 1559	<p>The PS correctly identifies that the majority of environmental and social impacts of the production stages of textile products occur in countries outside the EU (and mostly, though not exclusively in Asian countries). In these regions production at lower costs is possible due to less stringent environmental protection measures and poor labour conditions.</p> <p>The PS should note that GOTS covers both environmental and social criteria in the Standard, which are independently verified by approved certification bodies. This is important in overcoming the lack of oversight of, and adherence to, the strict implementation of environmental and social criteria in textile supply chain - from fibre to the finished product (whether apparel, fashion, home textiles, personal care products).</p>	Acknowledged

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		<p>Table 26 lists the Best Available Techniques for preventing and controlling industrial pollution around the world. It should be noted that the most ambitious mandatory system in the EU (covering 7 of the 8 environmental aspects) is mirrored in GOTS, which covers all of these aspects.</p> <p>Thus GOTS can help to prevent and control industrial pollution arising from textile fibre production and processing through organic standards.</p>	
645	5.7; 1556-1558	<p>On compliance costs, the JRC only refers to the IED. As a further example of added costs for companies, REACH compliance should be included, highlighting the challenge of unfair competition from imports from third countries where products may be manufactured without restrictions on chemicals, creating an uneven playing field.</p> <p>EURATEX stresses the broader issue of compliance and costs for companies, in light of all sustainability regulations that are currently being developed or updated and that impact the sector. A special consideration should be given to SMEs.</p>	<p>Partly accepted The text was updated</p>
646	5.7.; 1557	Line 1557, not only the manufacturers in EU but also the manufacturers that produce for European customers might face higher costs than companies producing in China and India due to prevention/reduction of emissions.	Acknowledged
647	5.7; 1559	<p>In line with Türkiye's rights and responsibilities stemming from the Customs Union, Türkiye is closely following the legislative developments within the framework of European Green Deal. In parallel to the European Green Deal, Türkiye published a comprehensive Green Deal Action Plan in 2021 and has taken action on a wide spectrum of areas. Technical Legislation on sustainable Products, Sustainable and Circular Textile Strategy, Sustainable Consumption and Production, Circular Economy can be listed among the 20 specialized working groups, where public and private sector is working together to determine the steps to be taken.</p> <p>Within this framework, Türkiye has taken a significant step and has drafted a national legislation in order to align with the Industrial Emissions Directive no 2010/75/EU. The draft legislation is based on the Best Available Techniques (BAT), Best Available Techniques Reference documents (BREFs) and BAT Conclusion documents of specific sectors listed in Annex I of the EU legislation. In that respect, following the publication of the Turkish legislation in the Official journal, Türkiye will adopt the relevant BREF document in the textile sector in line with the EU legislation. With the new legislation, Türkiye aims to take significant steps to incentivise green transition in</p>	Acknowledged

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		<p>current facilities and set the rules for the new facilities to be established according to BATs.</p> <p>Furthermore, Türkiye is also working on to develop a Sustainable Consumption and Production Action Plan and a National Circular Economy Action Plan, where textile has been identified as a priority sector in both of the studies. All these studies aims to bring Türkiye's textile sector closer to EU legislation and standards.</p>	
648	5.8 Lifespan of apparel textiles; 1569 – 1615: general comment	<p>We agree with the JRC's finding that the lack of direct measurement method does not allow the provision of a better understanding of the important parameter of lifespan. We urge the Commission to obtain EU funded independent research as soon as possible to properly characterise the influence of a product's intrinsic attributes on lifespan of apparel textiles.</p> <p>The potential to use the Product Environmental Footprint Category Rules (PEFCR) for apparel and footwear to inform and guide ESPR is alluded to many times in this document. However, it is clearly acknowledged in PEFCR Annex IV (Exploring the extrinsic durability of apparel and footwear products) that the lack of robust science currently prevents reliable assessment of the most critical value in the PEFCRs, namely Duration of Service (DoS) which is the functional unit of the apparel and footwear PEFCRs.</p> <p>The Annex highlights the need to prioritise research to address the key knowledge gaps required to understand and more reliably account for product lifetime. Such research is possible and relevant studies have been proposed (i.e. Waste audit interviews - A method for understanding the link between intrinsic quality and apparel lifespans by Kirsi Laitala and Ingun Grimstad Klepp Consumption Research Norway (SIFO), Oslo Metropolitan University. Link: https://clothingresearch.oslomet.no/wp-content/uploads/sites/1026/2024/04/NewMethod.pdf).</p> <p>Generating a robust science-base to PEFCR methodology is strongly recommended prior to its adoption for informing ecodesign requirements in ESPR.</p>	Acknowledged

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		<p>When it comes to the PEFCRs which the JRC is also basing its work, they are built on an underlying assumption that the more physically durable a garment is, the more often it will be worn, so the less often it needs to be replaced.</p> <p>However, consumer research consistently shows that only about one-third of clothing is thrown out because it's worn out. In other words, approximately two thirds of discarded clothing still have perfectly usable functionality or are 'durability intact'. But, when estimating garment lifetime (which is the single most important metric in PEF), these PEFCRs overlook the two thirds of reasons for clothing disposal and prioritise physical durability testing to estimate garment lifetime. This has the effect of significantly over-weighting the influence of physical durability on the PEF score.</p> <p>These PEFCRs are consequently biased in favour of polyester and other strong synthetic fibres (which perform particularly well in physical durability tests), in the absence of evidence that these higher levels of durability actually increase product lifetime. Rather, the evidence is compelling that the increased availability of cheap polyester clothing has been the enabler of fast fashion, and hence, shorter garment lifetime (Niinimäki 2020.)</p> <p>Resource: IWTO Discussion Paper - Accounting for non-physical durability.</p> <p>Will be sent by email to the JRC provided email.</p> <p>Niinimäki K, The environmental price of fast fashion, Nature Reviews Earth & Environment · April 2020</p>	
649	5.8 Lifespan of apparel textiles; 1569	<p>There are several partially overlapping definitions and terms suitable to refer to longevity and durability. Regardless of which terms are used, it is important to keep in mind that the material capability of a product to perform over time (durability), is not the same as how long it has actually been used (e.g. Duration of Service (DoS)). The former looks forward to an unknown future and predicts it, while the latter looks back to what has happened. Unfortunately, there is little research that deals with the relationship between durability and DoS, and several problems occur when trying to predict DoS based on product characteristics as outlined in (Klepp et al., 2023b). We have therefore developed a new method which has this as its aim, and which can be used to verify whether</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>different theories about durability do or do not have an effect on lifespan (Laitala & Klepp, 2024).</p> <p>The situation is further complicated because DoS, or clothing lifespans, can be described and measured in years, the number of wears, cleaning cycles, and/or users. All have an independent value (Klepp, Laitala, & Wiedemann, 2020). Prolonging the lifespan of a product will not have any environmental impact if it causes another product's lifespan to be shortened. It is the total utilisation rate for clothing (e.g. in the EU) that must be increased in order to reduce environmental burdens. Overall, this will be the number of clothes (imported + produced) divided by the number of users, if the denominator increases more than the numerator, the utilization rate decreases.</p> <p>In Consumption Research Norway SIFO's latest research paper on The Impact of Modes of Acquisition on Clothing Lifetimes (Laitala et al., 2024) the conclusion is among other things that:</p> <p>"The overall utilisation rate, whether we look at a private wardrobe, a country, or the world, is more important than the lifetime measured in years for an individual garment when discussing the environmental impact of clothing. Few uses per garment generate an increasingly less efficient industry, which thus develops in the opposite direction than the principles of the circular economy where the aim is to keep the products and materials in circulation at their highest use-value for as long as possible. Clothing lifetimes are affected by the number of items in the wardrobe, and therefore, more of the discussion should be about overall utilisation rather than measures, whether they are political or personal, that seek to increase the lifetime of individual garments."</p> <p>References</p> <p>Klepp, I. G., Laitala, K., Berg, L. L., Tobiasson, T. S., Måge, J., & Hvass, K. K. (2023b). USED, BUT NOT USED UP: Using textile waste to inform textile rating schemes. In A suggestion for empirically based policy measures to reduce the environmental impacts of clothing and footwear: SIFO.</p> <p>Klepp, I. G., Laitala, K., & Wiedemann, S. (2020). Clothing Lifespans: What Should Be Measured and How. Sustainability (Basel, Switzerland), 12(15)(6219), 21. doi:10.3390/su12156219</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Laitala, K. & Klepp, I.G. (2024) Waste audit interviews - A method for understanding the link between intrinsic quality and apparel lifespans. Consumption Research Norway (SIFO), Oslo Metropolitan University. https://clothingresearch.oslomet.no/wpcontent/uploads/sites/1026/2024/04/NewMethod.pdf</p> <p>Laitala, K., Klepp, I. G., & Løvbak Berg, L. (2024). The impact of modes of acquisition on clothing lifetimes. In K. Niinimäki (Ed.), Recycling and Lifetime Management in the Textile and Fashion Sector (pp. 91-111). Boca Raton: CRC Press.</p>	
650	5.8; Question Can you share information about studies focussing on lifespan? Dated and recent studies are relevant.	The factors influencing lifespan are: quality+desing of the fabric and the final good; coloring, fibre composition and the timeless desgin of the cloth etc. There are some research made on this issue, but there is no English translation.	Acknowledged
651	5.8; 1569	As advocated by this study, for example, there's no scientific evidence that better physical durability would actually reduce textile consumption and associated environmental impacts; https://clothingresearch.oslomet.no/2023/03/17/new-briefing-outlining-research-behind-the-tpr-proposal/	Acknowledged
652	5.8; 1570-1602	We align with the approach taken in the draft PS study regarding non-physical durability. It plays a fundamental role in the longevity of the textile industry. However, the research and scientific evidence still needs to be more incipient to create a meaningful policy and avoid negative or unimpactful consequences for the textile industry.	Acknowledged
653	5.8; 1570-1615	<p>Klepp, Laitala & Wiedemann. Clothing lifespans: What should be measured and how. 2020</p> <p>Laitala & Klepp. What Affects Garment Lifespans? International Clothing Practices Based on a Wardrobe Survey in China, Germany, Japan, the UK, and the USA. 2020</p> <p>Aakko & Niinimäki. Quality matters: reviewing the connections between perceived quality and clothing use time. 2022</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>Laitala. Consumers' clothing disposal behaviour – a synthesis of research results. 2014</p> <p>Neto & Ferreira. Lasting Bonds: Understanding Wearer-Clothing Relationships through Interpersonal Love-Theory. 2023</p> <p>Laitala & Klepp. Clothing Longevity: The Relationship Between The Number of Users, How Long and How Many Times Garments are Used. 2021</p> <p>Niinimäki. Sustainable consumer satisfaction in the context of clothing. 2017</p> <p>Niinimäki. Forming sustainable attachments to clothes. 2010</p> <p>Niinimäki. Textiles and garment lifetimes. 2023</p>	
654	5.8; 1570-1602	<p>The Policy Hub stands with the definition included in the Eco-design for Sustainable Products Regulation, which defines durability as the ability for a product maintain over time its function and performance under specified conditions or use, maintenance, and repair.</p> <p>We align with the approach taken in the draft regarding non-physical durability. It plays a fundamental role in the longevity of the textile industry. However, the research and scientific evidence still needs to be more incipient to</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>create a meaningful policy and avoid negative or unimpactful consequences for the textile industry.</p> <p>The table in line 1577 should also align with PEFCR for apparel, as they have defined what is considered a “use” as well. In addition to table 28 and 29, it would be good to do a similar comparison for number of estimated washes, as this is often assumed to dictate the durability of a garment, and also decides the environmental impact during the use phase.</p>	
655	5.8; 1577	This table should be aligned with PEFCR for apparel, as they have defined what is considered a "use" as well.	Acknowledged
656	5.8; 1577	-◆We agree with applying the ‘service lifespan’ when considering eco-design requirements. However, it is critical to ensure that the definition is as clear as possible: We would caution against the word ‘usable’, as this is highly subjective. E.g. what makes a garment remain usable? For instance, should a garment no longer be usable only when it breaks and get holes? Or also should the definition include typical failure mode such as colour fading and pilling where some customers would discard a garment, but for other customers they see the garment as still usable.	Acknowledged
657	5; 1577	What is meant with lifespan? (f.e. is that per user or multiple users?) Definitions should be included. Recommend to have them aligned with the PEFCR and certification schemes.	Rejected Definitions are reported in Table 27
658	5.8.; 1577	Line 1577 Table 27, It is hard to measure lifespans. Especially the ones related to consumers.	Acknowledged
659	5.8; 1591	The ownership and use have changed recently due to the rapid spreading transaction by C2C and C2B after middle of 2010s. As a result, the period and number of times new products worn by buyers might became much shorter, and it might be a contributing factor to the increase in waste, but statistical data is not available.	Acknowledged
660	5.8 Lifespan of apparel textiles; 1605: Table 28 “Possession span of apparel textiles expressed in years”	<p>We encourage the JRC to review possession spans of apparel textiles based on fibre composition as this also influences possession span. Research shows that a wool t-shirt is possessed longer compared to a cotton t-shirt.</p> <p>Based on the analysis of nine reviewed studies, the average duration of garment possession across all categories was found to be four years. However, this duration varied significantly among different types of garments, ranging from 2.6 years for socks to over six years for jackets, skirts, coats, dresses, and suits. It is important to note that these studies focused on the age of the product up to the completion of the study or the possession span with a single current user, rather than considering the total lifespan of clothes if owned by multiple users. It is also worth noting that only garments kept for an extended period can be worn repeatedly. If clothes have limited potential for use occasions, they must be possessed for a long duration, either by a single user or by multiple users, in order to</p>	Acknowledged The authors invite the stakeholder to share data and references about their suggestion on lifespan of textile apparel based on fibre composition.

ID	Stated section; stated line	Comment	Answer
		<p>achieve a high number of wears.</p> <p>Resource: Laitala, K.; Klepp, I.G.; Henry, B. Does Use Matter? Comparison of Environmental Impacts of Clothing Based on Fibre Type. Sustainability 2018, 10, 2524. https://doi.org/10.3390/su10072524</p>	
661	5.8 Lifespan of apparel textiles; 1611: Table 29 “Duration in use of apparel textiles expressed in days of wear	<p>Limited research exists on garment lifespans measured by the number of times they are worn, known as the number of wears. An illustration of this can be seen in the work by WRAP; Cooper et al. provided estimates of wear frequencies, suggesting that jeans are worn approximately 75 times per year, while socks and knitwear are worn around 50 times, t-shirts 25 times, and shirts 16 times annually. Additionally, they computed the total number of wears based on the target lifespan measured in years; for instance, jeans should ideally be worn 300 times over a span of four years. Survey data collected from four countries revealed that, on average, consumers reported wearing their t-shirts and jeans at least monthly over a period of 3–4 years, resulting in an estimated total wear count of approximately 42 times. Previous studies on wardrobe composition have demonstrated significant variations in wearing frequencies and the number of wears among garments. It is common for wardrobes to contain garments that are not actively used. For instance, in Norway, approximately 20% of garments are either never worn or worn only a few times, while in the UK, around 30% of clothing in the average wardrobe has not been worn in the last year.</p> <p>Resource: Laitala, K.; Klepp, I.G.; Henry, B. Does Use Matter? Comparison of Environmental Impacts of Clothing Based on Fibre Type. Sustainability 2018, 10, 2524. https://doi.org/10.3390/su10072524</p>	Acknowledged
662	5.8; 1611	In addition to table 28 and 29, it would be good to do a similar comparison for number of estimated washes, as this is often assumed to dictate the durability of a garment, and also decides the environmental impact during the use phase.	Acknowledged
663	5.8; 1611	this is an extremely important assumption especially when estimating the environmental footprint per use time (emissions are divided by the amount of uses). In our study we used 200 times for the polyester t-shirt. Polyester is a very durable material, more durable than cotton, for example. Even 400 use times would pass technically! https://www.sciencedirect.com/science/article/pii/S0048969723024427#ec0005	Acknowledged
664	5.8; 1611	Table 29. It could be number of uses as well as in this report: G.Sandin-Environmental-assessment-of-Swedish-clothing-consumption.MistraFutureFashionReport-2019.05.pdf. Since we refer to the report by G.Sandin 2019 a several times, we would like to clarify that this report is an update of S.Roos 2015.	Acknowledged

ID	Stated section; stated line	Comment	Answer
		G.Sandin-Environmental-assessment-of-Swedish-clothing-consumption.MistraFutureFashionReport-2019.05.pdf	
665	Market analysis; Environmental labels	Info about Pakistan: https://www.researchgate.net/publication/338129728_Eco-labeling_and_sustainability_A_case_of_textile_industry_in_Pakistan	Acknowledged
666	5.9; 1616	Utopia.de investigated consumer's knowledge on labels, this might indicate market penetration Lost-im-Label-Dschungel_Utopia-Siegel-Studie-2022_Sneak-Preview-final.pdf (utopia-insights.de, https://utopia-insights.de/app/uploads/2022/10/Lost-im-Label-Dschungel_Utopia-Siegel-Studie-2022_Sneak-Preview-final.pdf) (unfortunately in German). Further information can be requested at studie@utopia.de	Acknowledged
667	5.9; 1616-1622	<p>There were more than 13,549 entities certified to GOTS in 2022, a 10% growth over 2022 in 84 countries independently certified by 24 certification bodies. Growth has continued in 2023. See the GOTS Annual Report (https://global-standard.org/images/resource-library/documents/GOTS-Annual-Reports/GOTS_Annual_Report_2022.pdf). The Annual Report for 2023 will be issued shortly.</p> <p>Although this is a small percentage of the global supply chain of textile products, it represents a growing sector an one which consumers and businesses trust to deliver traceability and transparency. It is thus a landmark and lighthouse initiative and one which is worthy of highlighting and referencing in the PS.</p> <p>GOTS continues to work to collect information on market penetration.</p> <p>A GOTS consumer focused campaign #BehindTheSeams, reached >40 million impressions and >21 million unique consumers in 2023.</p> <p>Consumer attitudes towards GOTS, sustainability and ethically produced textiles underscore the growing consumer</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>awareness and demand for sustainably produced textiles, highlighting the value proposition that GOTS certification offers to companies seeking to align their efforts with consumer preferences and market trends:</p> <p>1. Increased Business Opportunities:</p> <p>66% of survey respondents (Survey among GOTS certified entities) reported that GOTS certification offered them an increase in business opportunities in 2023.</p> <p>2. Consumer Demand for Ethical Production:</p> <p>According to research by Censuswide in 2023, a substantial 66.17% of all consumers expressed a desire for more of their textiles to be ethically and sustainably produced.</p> <p>3. Accessibility of Sustainable Products:</p> <p>Censuswide's 2023 research also revealed that only 36% of consumers find it easy to locate sustainable and ethically crafted textile products, indicating a gap in the market that GOTS certification can help address.</p> <p>4. Importance of Fair Production:</p> <p>The same study showed that 59% of consumers expressed the importance of knowing that every stage of a product's production is fair for the workers involved and environmentally friendly.</p> <p>5. Trust in Verified Claims:</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Censuswide's 2023 findings indicated that nearly 60% (59.9%) of consumers place greater trust in independently verified claims over a brand's self-proclaimed environmental and social responsibility.</p> <p>Among the four best known certificates, GOTS is rated top in almost all criteria.</p>	
668	5.9; 1617	<p>Our Federation has had the opportunity to raise the Commission's attention on the potential counterproductive effect of multiplying the types of labelling and sources of information on the impacts and characteristics of products.</p> <p>We therefore agree that information requirements should focus on providing consumers with relevant information on the production, use and end of life of textile products without duplicating such information between several labels or data carriers.</p> <p>For the sake of consistency, efficiency and clarity for the consumers, we agree that information requirements should be centralised between the future Digital Product Passport, so that all information can be accessible through the same data carrier.</p> <p>Besides, the information to be published should focus on those that are relevant for the interested stakeholders, without leading to disproportionate administrative and technological burdens on businesses or the disclosure of any sensitive data or trade secrets.</p> <p>Besides, digital labelling will need to be based on a technology that ensures the security of the data stored, chosen in consultation with industry representatives and in consideration of existing solutions and their environmental impact.</p> <p>Finally, under Article 13 of the French AGEC Law , operators are already subject to the disclosure of numerous information regarding the environmental characteristics and qualities of the products placed on the French market, such as the incorporation of recycled material, recyclability, presence of substances of concern, traceability, presence of microplastics.</p> <p>We therefore call, not only for the consideration of such pre-existing national regulations to ensure the best possible implementation of the future harmonized rules, but for sufficient and realistic implementation and transition deadlines, avoiding unreasonable administrative and financial burden for stakeholders across all Member States.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
669	5.9; 1617-1623	This is an important section as well, since there are so many labels for textiles. I think the problem is, that there are too many labels, for common consumers to understand their claims anymore. In fact, according to the eurobarometer, consumers don't understand the contents, nor do they absolutely trust the labels.	Acknowledged
670	5.9; 1620 - 1623	[...] supports the inclusion of information on recycled content and readiness for recycling in an apparel textile's label, both physical and digital. This is not only important to empower consumers to make more sustainable choices, but also to allow sorters and recyclers to process more efficiently post-consumer waste streams.	Acknowledged

9 Comments on section 6 – User behaviour

Table 12. Comments on section 6 – User behaviour

ID	Stated section; stated line	Comment	Answer
671	6.2.7; 6.2.7	Importance of a realistic scaling if target on recycled content will be introduced. Rather push the apparel industry to use recycled content in all textiles than having a high number of recycled content in a small capsule collection. Broad implementation.	ACKNOWLEDGED.
672	Section 6 - Consumer behaviour; 1624 – 2199	Consumer surveys appear outdated (15 years old) and based on limited sample of the European population. The lack of relevant data and representativeness is likely too diminish the quality of the conclusions drawn from these studies. We recommend that ad-hoc studies are conducted.	<p>ACKNOWLEDGED.</p> <p>The JRC acknowledges that some of the references are not very recent and that the sample sizes, while significant, do not fully represent the entire EU population, nor do they capture all the nuances between member states, age groups, genders, and income levels.</p> <p>Given these limitations, the JRC has made every effort to extract valuable insights from the existing studies. The sample sizes of the analysed studies, do provide a substantial amount of information and have been instrumental in identifying general trends and behaviors.</p> <p>Moreover, the JRC has used the studies publically available and requested stakeholders to provide additional references, if possible.</p> <p>The JRC is committed to ensuring that the information included in the PS are based on the most accurate and representative data available, and we appreciate the support from</p>

ID	Stated section; stated line	Comment	Answer
			stakeholders in providing references to studies to achieve this goal.
673	6; Lines 1624 to 2199	<p>- As eco-design measures are meant to stimulate sustainable consumption patterns, to make meaningful policy it is important to ensure that future ecodesign requirements for textiles are based on up-to-date and representative scientific data.</p> <p>- We noticed several references date back up to 15 years ago or are based on a limited sample of the European population. This lack of data does not enable us to ensure a proper representativity of European consumers nor reflect the differences among member states and groups (age, gender, income levels, etc.).</p> <p>- This is especially the case in the following sections: 6.2.3 User quality assessment of apparel: key insights, 6.2.4 Consumer behaviour towards labels on apparel, 6.2.6 Attitudes towards chemicals in apparel and 6.4.1 Reasons for the disposal of apparel.</p> <p>- We recommend that where there are no existing more recent references, ad-hoc studies should be promoted for collecting updated information.</p> <p>- In addition, we recommend the European Commission to run a dedicated study on consumer behavior of textile products to better account for their consumption habits, preferences, etc. The study should go deeper and be tested based on user experience to understand what can trigger change and what could be potential blockers to change (e.g. overloading consumers with information).</p>	<p>ACKNOWLEDGED.</p> <p>The JRC acknowledges that some of the references are not very recent and that the sample sizes, while significant, do not fully represent the entire EU population, nor do they capture all the nuances between member states, age groups, genders, and income levels.</p> <p>Given these limitations, the JRC has made every effort to extract valuable insights from the existing studies. The sample sizes of the analysed studies, do provide a substantial amount of information and have been instrumental in identifying general trends and behaviors.</p> <p>Moreover, the JRC has used the studies publically available and requested stakeholders to provide additional references, if possible, regarding the sections mentioned, in particular 6.2.4 and 6.2.6.</p> <p>The JRC is committed to ensuring that the information included in the PS is based on the most accurate and representative data available, and we appreciate the support from stakeholders in providing references to studies to achieve this goal.</p>
674	6; 1624	Several references date back to 2017 and even 2009 (15 year ago) and most of them are based on a sample of almost 28 000 respondents or even less, 5 000 respondents, in some cases. To create meaningful policy that will also drive consumer behaviour, the eco-design	<p>ACKNOWLEDGED.</p> <p>The JRC recognizes that some of the references are not very recent and that the</p>

ID	Stated section; stated line	Comment	Answer
		<p>requirements must be based on updated and representative scientific data. We recommend that where more recent references are not available, ad hoc studies should be promoted for collecting updated information.</p>	<p>sample sizes, while significant, do not fully represent the entire EU population, nor do they capture all the nuances between member states, age groups, genders, and income levels.</p> <p>Given these limitations, the JRC has made every effort to extract valuable insights from the existing studies. The sample sizes of the analysed studies, do provide a substantial amount of information and have been instrumental in identifying general trends and behaviors.</p> <p>Moreover, the JRC has used the studies publically available and requested stakeholders to provide additional references, if possible.</p> <p>The JRC is committed to ensuring that the information included in the Preparatory Study are based on the most accurate and representative data available, and we appreciate the support from stakeholders in providing references to studies to achieve this goal.</p>
675	6; General	<p>We noticed several references dated back to 2017 and even 2009 (15 year ago). Besides, most of the references used are based on a sample of almost 28 000 respondents or even less, 5 000 respondents, in some cases. The population of the EU is slightly over 448 million people and the differences between MS, age groups, gender and income levels should be properly represented in the data about consumer behaviour. To create a meaningful policy that will also drive consumer behaviour, the eco-design requirements must be based on updated and representative scientific data. We recommend that where there is not more recent references, ad hoc studies should be promoted for collecting updated information.</p>	<p>ACKNOWLEDGED.</p> <p>The JRC recognizes that some of the references are not very recent and that the sample sizes, while significant, do not fully represent the entire EU population, nor do they capture all the nuances between member states, age groups, genders, and income levels.</p>

ID	Stated section; stated line	Comment	Answer
			<p>Given these limitations, the JRC has made every effort to extract valuable insights from the existing studies. The sample sizes of the analysed studies, do provide a substantial amount of information and have been instrumental in identifying general trends and behaviors.</p> <p>Moreover, the JRC has used the studies publically available and requested stakeholders to provide additional references, if possible.</p> <p>The JRC is committed to ensuring that the information included in the Preparatory Study are based on the most accurate and representative data available, and we appreciate the support from stakeholders in providing references to studies to achieve this goal.</p>
676	6; 1624	<p>Recyclability and eco-modulation: Various measures may be anticipated for ready-made clothing products that are not suitable for recycling according to the directive. However, it is considered necessary to take into account the high customer demand for ready-made garments produced by mixing different types of fibers, which have low or impossible recycling suitability, and the market power that our country's ready-made clothing sector holds in blended products. From this perspective, fibers like elastane, whose recycling technology has not yet developed, should be excluded from the scope of the directive until such technology advances.</p>	ACKNOWLEDGED.
677 a	6; 1624	<p>1. Are you aware of studies/surveys estimating the apparel purchase frequency in different Member states?</p> <p>At the Swedish EPA we have a time serie for textile consumption (import-export) over the period of 2000-2023 showing textiles put on the Swedish market for the subgroups women/men/unisex/ home textiles. https://www.naturvardsverket.se/data-och-statistik/textil/textilkonsumtion/</p>	<p>ACKNOWLEDGED.</p> <p>It is observed that the annual textile consumption is stabilized at around 13-14 kilos per person in Sweden, which is in line with the EU average reported now in Section 9.6.1 on pre-purchase aspects.</p>

ID	Stated section; stated line	Comment	Answer
667b	6; 1624	See the working paper shared by email named "Exploring sufficiency approaches to textiles policy".	ACCEPTED. Information contained in the mentioned working paper has been included in the section of pre-purchase aspects.
678	6; 1626-1658	<p>When it comes to the sharing of information with consumers and the setting of information requirements, it is imperative to underscore that the formulation of these should consistently align with the overarching goals of the ESPR legal framework.</p> <p>Therefore, the selection of these requirements must be grounded in their potential to significantly impact the textiles sector, and only be established where such information is proven to clearly support consumers, public authorities, and actors in the textiles value chain in engaging in more circular practices.</p>	ACKNOWLEDGED.
679	6; 1626-1658	<p>When it comes to the sharing of information with consumers and the setting of information requirements, it is imperative to underscore that the formulation of these should consistently align with the overarching goals of the ESPR legal framework.</p> <p>Therefore, the selection of these requirements must be grounded in their potential to significantly impact the textiles sector, and only be established where such information is proven to clearly support consumers, public authorities, and actors in the textiles value chain in engaging in more circular practices.</p> <p>We would like to highlight the need for alignment with the wording included in the ESPR legal framework, acknowledging that all information should be sector-specific, as certain information requirements will be more relevant to enable circularity and to meet circular economy targets for certain sectors rather than others. Hence, we recommend that the relevance of the requested data should be evaluated against the needs of different sectors.</p>	ACKNOWLEDGED.
680	6; 1636	"Because of higher pricelevel of electronics, behaviour will be different for electronics as for textiles. So again link with MEErP is not valid. See the following studies	ACKNOWLEDGED AND CLARIFIED. The JRC is fully aware that consumer behavior varies significantly between different product categories, such as textiles and electronics.

ID	Stated section; stated line	Comment	Answer
		<p>1. EU onderzoek: Behavioural Study on Consumers' Engagement in the Circular Economy</p> <ul style="list-style-type: none"> - Depending on how durability/reparability information was presented, willingness-to-pay for an additional year of durability ranged between €20-36 for vacuum cleaners and dishwashers, €92-148 for TVs, €148-217 for smartphones, and €14-27 for coats. Willingness-to-pay for an improved reparability rating was around €29-54 for vacuum cleaners, €83-105 for dishwashers, €77-171 for TVs, €48-98 for smartphones and €10-30 for coats €130. <p>2. Repair target group exploration of Motivation:</p> <ul style="list-style-type: none"> - This report provides insight into the motivations of frontrunners in the field of repairs and how they can be encouraged to motivate others to repair more often. - From a behavioral perspective, it is important to make the distinction between doing it yourself and having it repaired. There are 2 different types of behavior, but both promising, especially if we look at the willingness: The openness to repair (have it repaired or attempt to repair it yourself) is 68% (Milieu Centraal, 2023). Motivation has also previously conducted research into the leaders in repair and what drives them. - The conclusions of this study are clearly presented on pages 4 to 6. <p>"</p> <p>We will send you the reports via e-mail.</p>	<p>The differences in willingness to pay for durability and reparability are influenced by several factors, including the initial price level, perceived value, and expected lifespan of the products.</p> <p>Nonetheless, information included in the PS on willingness to pay/repair is specific for Textiles.</p> <p>Finally, the distinction between repairs carried out by consumers and by professional repairing shops have been mentioned in the Preparatory Study section 9.6.1.1 on reasons for purchasing and section 9.6.2.9 on Repairing. Additional information from the indicated study has been included.</p>
681	6.1; 1638-1640	Important to analyse how the ESPR requirements and eco label actually affects the consumers and bring about a changed behaviour.	<p>ACKNOWLEDGED AND CLARIFIED.</p> <p>This will only be possible after the publication of the first Delegated Act.</p>

ID	Stated section; stated line	Comment	Answer
682	6; 1639	There are more relevant aspects than recyclability. Have a look at article 5 ESPR , needs clarification	ACCEPTED. The sentence has been removed.
683	6; 1655	<p>In line with elements mentioned in table 30 and especially the reference to durability and product-person attachment. In this regard, the Federation is keen to be associated to any work aimed at defining durability / assessing quality / ecodesign requirements on these aspects.</p> <p>On ID 7 regarding laundering practices: chemical substances to avoid or technologies to prefer (E.g. for dry cleaning: using AquaClean or liquid CO2 technologies have a much lower impact than conventional technologies with perchloroethylene)</p>	ACKNOWLEDGED.
684	6. User behaviour; 1655 - 1657	<p>[...] calls for consideration of specificities of sportswear products in the context of user behaviour, in particular purchasing decisions, and product care behaviour among others. For example, more frequent laundering behaviour of sportswear can be assumed, for example laundering after a single use will be more common than for lifestyle apparel. Also, due to their unique fabric composition and the strenuous conditions they're subjected to, activewear and sportswear require specific care to maintain their quality and extend their lifespan. Sweat, body oils, sunscreen, and outdoor elements can all take a toll on these garments, leading to issues such as colour fading, odour retention, loss of elasticity, and fabric wear and tear. See, e.g.:</p> <p>https://www.freshrobe.com/site/blog/guide-to-washing-and-caring-for-your-activewear-and-sportswear</p> <p>https://www.pactimo-custom.com/pages/custom-cycling-washing-care-instructions</p> <p>https://www.atsko.com/proper-care-for-performance-fabrics/</p> <p>Furthermore, purchase behaviour is also influenced by the garments ability to achieve certain performance expectations, which is not the case for lifestyle apparel (notably examples such as sports bras and performance swimsuits). The JRC study is only investigating general user behaviour related to lifestyle and fashion apparel without investigating specific user behaviour for sports apparel further.</p>	<p>ACCEPTED.</p> <p>Particularities in laundry frequency behaviour related to sportswear have been added in both, section 6.3.1 and the 'supporting information about user behaviour' section 9.6.2.</p> <p>Additionally, in section 9.6.1 on pre-purchase aspects, it has been added that the surveys analysed so far do not specifically address sportswear.</p> <p>Therefore, information from the US consumer survey ran by Cotton Incorporated has been added to section 9.6.1 on pre-purchase aspects and section 6.2.2.</p>

ID	Stated section; stated line	Comment	Answer
		<p>A US consumer survey undertaken by Cotton Incorporated (https://lifestylemonitor.cottoninc.com/winning-in-the-u-s-activewear-market/) found that top purchase drivers for activewear among consumers were: comfort (77%), fit (69%), washes clean (65%), quality (64%), durability (62%). Consumers were furthermore likely to seek out the following performance features in activewear: odour resistant (69%), moisture management (68%), stretch (67%), thermal regulation (63%), and antimicrobial (61%).</p> <p>The sportswear sector acknowledges the increasing trend to also wear sportswear in daily life activity, which is due to their performance characteristics of comfort and fit resulting from specific design and material choices. Consumers seek these products increasingly because they have these performance expectations. The technologies used to fulfil these expectations, however, are not sufficiently homogenous to lifestyle apparel to score them the same across all categories as outlined above and should therefore be reviewed separately.</p>	
685	6; 1655	Table 30 – ID 12. The table says that the lack of quality is among the main reasons for returning products. However in section 6.4.4 in line 2183-2184 it is referenced that the main issue for returns are fit issues followed by taste-related unsuitability. The 3rd and last reason is quality. Could you please explain the reference behind the affirmation included in the table 30? (it is quite of the opposite of the references included in section 6.4.4.).	<p>CLARIFIED.</p> <p>The reference behind the statement is in lines 4018-4024: “ The main reasons found in the literature for returning apparel are problems fitting the item and the dislike of the apparel by the consumer. These two reasons are closely followed almost equally by lack of quality of the apparel and receiving a faulty item. A survey run by Foresight Factory in 2021 with over 20 000 respondents, reports the same main reasons for returning apparel by consumers; 38% of them reported that the items did not fit well while 15% of respondents indicated that the apparel did not suit them. Quality was not enough for 14% of</p>

ID	Stated section; stated line	Comment	Answer
			the survey participants and 13% of them received faulty items (Foresight Factory, 2021) ” .
686	6.1 Introduction; 1655	Table 30. ID 11. Aspect: “Reasons for disposal and product-person attachment”. Comment: “The early disposal of apparel by users could trigger the need for the development of durability ecodesign requirements”. Here, [...] would like to highlight the importance of material and durability fit for purpose. Material and durability choices need to take in product type and use, target group and trend sensitivity into consideration. Ex. trend sensitive product categories (e.g. tops for young females) may not be extensively used and may not have, due to market prerequisites, the potential for prolonged life. In this particular case, a more sustainable solution could be to use a recyclable material. To trigger new behavior patterns and reflect on choices of a durable garment, economic incentives need to be implemented, to hinder early disposal and stimulate second hand markets.	ACKNOWLEDGED. The JRC agrees that these factors need to consider product type, target group, and trend sensitivity. Your example of trend-sensitive product categories, such as tops for young females, highlights the complexity of designing for durability. More supporting information is indeed needed to address this aspect comprehensively. We will investigate this further in the coming steps of the project, including the potential for using recyclable materials.
687	6.1; 1655	<p>Disposal and transfer/sale should be clearly distinguished, and the category of transfer/sale should be added as the new one.</p> <p>Traditionally, most resale items were sorted from post-consumer items (via clothing collection boxes) and put into resale channels, but pre-owned items have been directly put into resale by individuals, through C2B, C2C2B and the platform provided by some brands, so it is desirable to separate them. These trends have emerged as ICT lowered the barriers to manage excess apparel of consumer possessions, or in other words democratization.</p> <p>https://www.globaldata.com/store/report/apparel-resale-market-analysis/</p> <p>The resale channel is growing, outpacing the growth in general apparel sales, and C2B and C2C2B sales might be contributing to this.</p> <p>https://www.globaldata.com/store/report/apparel-resale-market-analysis/</p> <p>Regarding the resale channel through which clothing items are sorted and recovered from waste, EuRIC, a European waste collection industry association, has reported that the sorted items have nowhere to go due to overstock. The amount of clothing collected is increasing,</p>	PARTIALLY ACCEPTED. The authors would like to underline that resale has been mentioned in several sections of the Preparatory Study, specifically in lines 3780-3781 and 4406. Disposal is distinguished from resale, as evidenced in Table 77, where resale is not listed as a method of apparel disposal. Nonetheless, additional information has been added regarding the second-hand-market transactions among consumers and how it is linked with consumption and disposal patterns in section 9.6.1.5 on attitudes towards second-hand apparel purchase.

ID	Stated section; stated line	Comment	Answer
		<p>but since operations have been paid by the sale of sorted items, there are concerns that collection and sorting will cease due to the inability to sell them, and the amount of clothing that is incinerated without being sorted is increasing.</p> <p>Source: Europe's textiles sorting industry in crisis; urgent EU action needed, EuRIC, 15 April 2024</p> <p>https://euric-aisbl.eu/images/Press-releases/Statements/EuRIC_Statement_-_Europes_textiles_sorting_industry_in_crisis-urgent_EU_action_needed.pdf</p>	
688	6.1.; 1655	Line 1655 Table 30, ID1-2: style and aesthetics must also be included	<p>REJECTED.</p> <p>While we acknowledge that style and aesthetics are indeed important criteria for consumers when purchasing apparel, our focus in this table is specifically to highlight aspects connected to ecodesign. Therefore, we will not include aesthetics and style in this particular section, as it is crucial to maintain a clear emphasis on ecodesign principles.</p>
689	6.1; 1655	ID 11 in table 30: The wording "disposal" could lead the reader wrong and set it equal to waste. Important to include all perspectives and that this does not mean waste but also the sale of the garment to the next user. Maybe consider changing the wording to "change of ownership" or similar. If sold, the garment shift ownership and if trown away as waste, the waste is now the producers' responsibility.	<p>ACKNOWLEDGED.</p>
690	6; 1662	When it comes for apparel for children, it should be considered that the purchaser and the end user are not the same person, and any final decision is a compromise between the two.	<p>ACKNOWLEDGED.</p> <p>At the moment, the scope of the Preparatory Study addresses apparel categories without differentiating between adult and children apparel.</p>
691	6.2; 1663	There are several references dated back to 2017 and even 2009 (15 year ago). To create a meaningful policy that will also drive consumer behaviour, the eco-design requirements must be based on updated scientific data. Using data on consumer behaviour from 15 year ago is not suitable to make recommendations based on these. We recommend that, where	<p>ACKNOWLEDGED.</p> <p>The JRC acknowledges that some of the references are not very recent and that the sample sizes, while significant, do not fully</p>

ID	Stated section; stated line	Comment	Answer
		there are no more recent references, ad hoc studies should be promoted for collecting updated information.	<p>represent the entire EU population, nor do they capture all the nuances between member states, age groups, genders, and income levels.</p> <p>Given these limitations, the JRC has made every effort to extract valuable insights from the existing studies. The sample sizes of the analysed studies, do provide a substantial amount of information and have been instrumental in identifying general trends and behaviors.</p> <p>Moreover, the JRC has used the studies publically available and requested stakeholders to provide additional references, if possible.</p> <p>The JRC is committed to ensuring that the information included in the Preparatory Study are based on the most accurate and representative data available, and we appreciate the support from stakeholders in providing references to studies to achieve this goal.</p>
692	Section 6.2.1; 1664-1695	We strongly recommend the JRC to further investigate and include in their report that consumers' reasons for purchasing new clothes are the results of companies' practices and marketing. As said in previous comments, at least three fundamental enablers of overconsumption can be identified across the global fashion system: 24/7 marketing and sales; gambling on consumer demand; and artificially low retail prices. We encourage the JRC to reflect this reality in the preliminary study and to consider the possibility of setting ecodesign requirements to limit such practices. We will be happy to share a report with the JRC on this topic.	<p>Acknowledged</p> <p>The PS is addressing all factors influencing the consumption of products included in the scope. Task 4 analyses the user behaviour and business model of companies in the context of all relevant product aspects.</p>
693	6.2.1; 1664	Reason for purchasing apparel: Marketing and adds are not mentioned although they are well known to accelerate sales.	REJECTED.

ID	Stated section; stated line	Comment	Answer
			<p>In section 9.6.1.2 it is indicated that marketing is among the factors that may influence consumers buying behaviour. The Preparatory Study also highlights that discount offers, including global phenomena like New Year sales, influence impulsive purchases, leading to more frequent buying and increased monthly spending on apparel.</p> <p>The PS is addressing all factors influencing the consumption of products included in the scope. Task 4 analyses the user behaviour and business model of companies in the context of all relevant product aspects.</p>
694	Section 6.2.1; 1664-1695	<p>We strongly recommend the JRC to further investigate and include in their report that consumers' reasons for purchasing new clothes are the results of companies' practices and marketing. As said in previous comments, at least three fundamental enablers of overconsumption can be identified across the global fashion system: 24/7 marketing and sales; gambling on consumer demand; and artificially low retail prices. We encourage the JRC to reflect this reality in the preliminary study and to consider the possibility of setting ecodesign requirements to limit such practices. We will be happy to share a report with the JRC on this topic.</p>	<p>Acknowledged</p> <p>The PS is addressing all factors influencing the consumption of products included in the scope. Task 4 analyses the user behaviour and business model of companies in the context of all relevant product aspects.</p>
695	6.2.1; 1667	<p>The preparatory study highlights the two primary consumer approaches towards apparel textiles: those viewing it as purely functional and those seeing it as self-representational. These approaches offer useful insights when setting ecodesign requirements, as they highlight the important role played by design options and choices. Closing the loop on apparel textiles and setting ecodesign requirements requires taking into consideration these two primary consumer approaches towards apparel. Drop-in solutions that require no significant design alterations, such as Resortecs' heat dissolvable threads for active disassembly, and the possibility of effective recycling are a good example thereof.</p>	<p>ACKNOWLEDGED.</p>
696	6; 1673	<p>Clothes are almost never replaced because they are worn-out.</p> <p>Klepp, I.G., et al. Research briefing: Research input for policy development based on</p>	<p>ACKNOWLEDGED AND CLARIFIED.</p> <p>It is indicated that: "research suggests that the primary purchase motivations include looking good, replacing old items, buying essential wear, staying on-trend, acquiring</p>

ID	Stated section; stated line	Comment	Answer
		<p>understanding of clothing consumption. 2023 [cited 2023 25 April]; Available from: https://clothingresearch.oslomet.no/wp-content/uploads/sites/1026/2023/03/Research-briefing-on-clothing-consumption-1.pdf.</p>	<p>new apparel, and preparing for special occasions". It is not indicated that apparel is replaced because they are worn-out.</p>
697	6.2.1; 1675-1680	<p>The preliminary rightly highlights that discount offers influence impulsive purchases. Further to discount offers, BEUC recommends integrating other techniques used by brands to prompt impulsive purchases.</p> <p>Consumers increasingly face marketing techniques to steer their choices. This has become particularly relevant in the case of digital companies using choice architecture interfaces (i.e., options presented to consumers) to skew consumers towards choices that serve their own commercial interest. Businesses also resort to surveillance advertising, using algorithms to target consumers based on data about their interests, weaknesses and life circumstances.</p> <p>The use of shady practices to distort consumers' economic behaviour is nothing new, but it takes on a new dimension with the massive collection of behavioural data and the use of technology to steer behaviour. This phenomenon is known as "deceptive design" or "dark patterns" and relies on design tricks that influence or impair the autonomy, decision making or choice of customers, nudging or persuading them into decisions that they would otherwise not have made.</p> <p>Research by Public Eye and Swiss consumer organisation Fédération Romande des Consommateurs reveals the exposure of consumers to "dark patterns" when shopping for clothes online (https://www.frc.ch/dark-patterns-quand-les-interfaces-web-nous-manipulent/)</p>	<p>PARTIALLY ACCEPTED.</p> <p>Section 6.2.1 and 9.6.1.1 on reasons for purchasing mentioned the role of marketing strategies and other campaigns in impulsive purchase behaviour.</p> <p>Other marketing strategies such as the mentioned "dark patterns" have been added to section 9.6.1.1 "reasons for purchasing". However, it should be noted that it is not in the scope of the Preparatory Study for textiles to influence the companies choice of marketing strategies or similar.</p>

ID	Stated section; stated line	Comment	Answer
		<p>All the websites analysed employ various interface tricks pushing impulsive buying behaviours, overconsumption, and getting consumers to disclose their personal data to allow for surveillance advertising. For instance: (1) Encouraging the acceptance of unnecessary cookies or the disclosure of more personal data than necessary (e.g. by requiring registration of an account, pushing the use of apps, proposing bonus systems when evaluating articles or sharing personal data). (2) Creating a false feeling of urgency or scarcity and a 'fear of missing out' leading to impulsive purchases (e.g., the use of a "high demand" message, stocks counting, offers with a countdown timer, short-term promo codes...). (3) Using intrusive pop-ups with special offers or suggesting buying more items to receive discounts or free delivery. (4) Making certain choice options more prominent or easier to select. (5) Automatically adding products or supplementary services into the purchasing basket.</p>	
698	6.2.1 Reasons for purchasing apparel; 1682-1684	<p>E-commerce has the potential to provide extensive, reliable and easily verifiable information on products offered online. If properly designed (e.g., relevance and prioritisation, visual impact), such information can stimulate more thought-through buying while preventing information overflow. To make this possible, online retailers should be left enough leeway to decide how to design such information for consumers in an online context. On the other hand, wherever possible, labels and aggregated scores should be underpinned by EU-wide, harmonised methods to avoid market fragmentation and favour cross-border retail.</p>	ACKNOWLEDGED.
699	6.2.1; 1690	<p>Reparability is another aspect that is central to increasing the lifespan of a product, and issues connected to holes in seams and trim failure (mostly missing buttons and broken zips) contributes to why consumers are discarding their textile products. While a large part of the products discarded show multifaceted is-sues, repair can facilitate the prolongation of the life span of a product.</p> <p>It can be beneficial to consider if a more central approach to reparability information can serve as a way to facilitate information for consumers. While seams and zippers might lie within the responsibility of the manufacturer, some defaults are the result of tear and wear.</p> <p>Therefore, the aim of an information requirement on reparability must ensure that the</p>	ACKNOWLEDGED.

ID	Stated section; stated line	Comment	Answer
		<p>consumer is informed about the services a company provides to facilitate the repairs. Since there is no common framework or harmonized methodology to assess the reparability of products, it is relevant to consider what can be done as a starting point.</p> <p>Often companies include spare buttons or patches to the product or have some kind of repair service like repair kits available, which is why an information requirement should be aimed at consumers.</p> <p>For consumers, we recommend the Commission to consider mandatory information requirement to inform consumers:</p> <ul style="list-style-type: none"> • If spare parts are accompanying the product like a spare button or patches • If repair services are available like repair kits, spare parts, or if the company offers the services of a professional repairer. • If information on how to use a repair kit and use spare parts is made available by the producer. <p>While it for some products like electronic equipment can be relevant to introduce the possibility for repairers etc. to add repair information specific to the unique product to the available product information, for textiles it needs to be considered whether the cost of adding this feature by far supersedes the potential benefit for the consumer. Many repair services like tailors etc. are small companies with few employees, to whom adding a layer of additional administration would serve as a significant administrative burden.</p> <p>We are hesitant towards the approach taken by the PEFCR to reparability, e.g. by connecting</p>	

ID	Stated section; stated line	Comment	Answer
		<p>it to the cost of the garment (the so-called "repair ratio"). We would like to point to the section 9.6.2.8 of this report, where it becomes evident that most repairs are done either by oneself (45 pct.) or someone you know -privately (34 pct.), while going to the tailor is the 3rd option. This makes sense given that many repairs are very simple repairs like seams or buttons, which is also what table 72 shows that most are doing by themselves. The end conclusion of the section points to the person-product attachment to increase likelihood of repairs, but even this section cannot explicitly conclude that cost are the only factor with a causal link to person-product attachment.</p>	
700	6.2.1; 1690	<p>The [...] understands the importance of reparability in achieving the objectives of the ESPR legal framework. However, it is important to underline that the issue of reparability for textiles differs from other product categories, such as electronics, as the clothing repair is not as technical and complex, and the availability of spare parts is more widespread and standardised in the textile sector.</p> <p>Also, establishing reparability as a mandatory performance requirement at this stage would be premature for textiles as there are no industry standards to quantify reparability. Furthermore, the reparability of a product is influenced by various factors, including material composition, seam construction, component availability, and repair skill level. Therefore, establishing universal reparability metrics across diverse product categories would be highly complex, potentially impractical, and add little value to consumers. Additionally, enforcing such quantifiable standards would require developing robust testing and verification procedures, which could add a significant burden to both brands and regulatory bodies.</p> <p>On this note, Policy Hub advocates for including reparability as an information requirement to be included within the Digital Product Passport for those cases where reparability services are offered, incentivising brands to design products with repair potential while offering consumers valuable information to guide their purchasing decisions. We believe that product specific repair information is not scalable or delivers the envisioned impact. The aim of the information requirement on reparability must ensure that the consumer is informed about the services a company, or partners provides to facilitate the repairs.</p>	ACKNOWLEDGED.

ID	Stated section; stated line	Comment	Answer
		<p>Brands will hence be required to provide qualitative information about the potential repair of their products if such is made available by the brand. This could include:</p> <ul style="list-style-type: none"> • If spare parts accompany the product, like spare buttons, repair kits, or patches, or if the company offer services of a professional repairer. • If information on how to use a repair kit and use spare parts is made available by the producer. • If available, statements such as “This product uses replaceable components for extended wear” or “This product may be repairable; please check with your local tailor for options”. <p>Such qualitative disclosures would empower consumers to make informed choices about product reparability based on their needs, repair capabilities, and local repair infrastructure. With this objective in mind, the reparability information shall also be shared with retailers to inform their communication with consumers.</p>	
701	6.2.1 Reasons for purchasing apparel; 1693-1695	Zalando’s Attitude-Behavior Gap Report (https://corporate.zalando.com/en/our-impact/sustainability/sustainability-reports/attitude-behavior-gap-report#consumer-attitudes-seven-key-themes) revealed that consumers care a lot about sustainability and price.	<p>CLARIFIED.</p> <p>The following extract from the mentioned Zalando report (cited as Heiny and Schneide, 2021 in the Preparatory Study) indicates that “Two in three consumers say sustainability is important in their daily lives”. However this is a general statement and in the Preparatory Study the JRC focused on the sustainability related to apparel.</p> <p>In fact, related extracts from the Zalando report have been included in the section 9.6.1.1 on reasons for purchasing. In particular, in line 3731 it is indicated that “a substantial 82% of respondents admit to feeling some form of regret after shopping,</p>

ID	Stated section; stated line	Comment	Answer
			<p>with 28% expressing concerns about environmental impacts and labour conditions during production".</p> <p>This is linked to what Zalando's report indicates: "Consumers care a lot about Sustainability but less about sustainable fashion".</p> <p>Regarding price, in lines 3760 and 3761 it is indicated that: "35% of 2 500 survey 3761 respondents indicate that they often opt for a deal instead of a sustainable item" confirming that consumers care a lot about price.</p>
702	6.2.1; 1693 - 1695	<p>The preparatory study highlights that information requirements on the product regarding its lifecycle environmental impacts would allow consumers to be more aware of its impact. [...] experience supports this assessment: stating an apparel textile products' ecodesigned characteristics on its label, such as durability, recycled content and possibility of recycling, empowers consumers and encourages them towards more responsible consumption. [...] highlights the importance of avoiding greenwashing by ensuring that high-quality data and science-backed information are used. This is further underlined by the figure provided in lines 1723 to 1725 of the preparatory study, which highlights that 82% of respondents believe that there is insufficient information available regarding environmental aspects. The assessment included in lines 1756 to 1758 further supports this matter.</p>	ACKNOWLEDGED.
703	6.2.2; 1718	<p>The preliminary study highlights that fashion trends hold greater significance for younger consumers, as a sign of success, quoting a consumer representative conducted by AK Wienn and Greenpeace (2023). Another important finding from this survey which support quality and durability requirements could be added to the PS: "young people buy far more second-hand clothing (both online and offline – about 50% each); clothes swap parties are also popular in this age category".</p>	<p>ACKNOWLEDGED AND CLARIFIED.</p> <p>Section 6.2.5 includes statements connected to attitudes towards second-hand apparel purchase.</p> <p>In particular, in line 1868 it is included that "the younger population (...), lead in the adoption of second-hand apparel".</p> <p>Nonetheless, a reference to this study has been added in section 9.6.1.5 Attitudes towards second-hand apparel purchase.</p>

ID	Stated section; stated line	Comment	Answer
704	6.2.2; 1722	<p>[...] would like to suggest adding further references to consumer representative surveys which underly the relevance of quality and the environment as purchasing factor:</p> <ul style="list-style-type: none"> - CECU (December 2023): among the factors that most influence the decision of Spanish consumers to buy clothes are quality and price, followed closely by environmental impact (quite or very influential for 44,2% of the population) and the place where they have been manufactured (36.5%) (https://cecu.es/notas/la-poblacion-espanola-apoya-prohibir-la-venta-de-ropa-que-contenga-sustancias-quimicas-y-aquella-fabricada-en-condiciones-injustas/). - VZBV (November 2022): <ul style="list-style-type: none"> o 55% of German consumers would be willing to pay more for their clothes if being certain about increased durability. o 75% are willing to wear clothes longer instead of buying new to contribute to climate protection o https://www.vzbv.de/meldungen/umdenken-am-black-friday-bewusster-konsum-statt-schnaepchenjagd. - IPSOS and Altroconsumo (February 2024): <ul style="list-style-type: none"> o Half of Italians no longer pay attention only to the shape, size or price, but also to the material, to find natural or organic fabrics. They want to know if clothes are produced sustainably and companies or brands are truly committed to social and environmental issues. o The need for clearer and more transparent information on the real sustainability of the garments and the production processes behind them is felt by as many as 74% of the sample. o 29% of Italians keep and wear their clothes between one and three years if they are in good condition, 19% between 3 and 5 years and 32% do so for more than 5 years. 	<p>ACCEPTED.</p> <p>Information from CECU (2023), VZBV (2022) and IPSOS (2024) have been included in section 9.6.1.2, 9.6.1.3 and 9.6.1.4, respectively.</p>

ID	Stated section; stated line	Comment	Answer
		<p>o https://www.impegnatiacambiare.org/altrovestire/news/italiani-moda-sostenibile?utm_content=Box1.0-italiani-moda-sostenibile&utm_term=&utm_source=db-int_nmb&utm_campaign=fus-newsletter-apr-4-b-purple&utm_medium=nl_nmb&utm_content=242634&utm_id=2a765871-0be5-42de-885b-766ad9ffdd86&sfmc_activityid=376cb9df-47f2-4363-b138-e4459e2bfe94&utm_medium=nl_nmb</p>	
705	6.2.2; 1722-1750	<p>The Value-Action Gap would be interesting to mention here. It means, that even though many consumers say, that their values include sustainability, they don't necessarily act this way. So from a behavioural perspective, it could be critical also to understand why this value-action gap exists, and what drives us consumers to purchase more, even though it is not according to our values (or even fundamental needs). See eg. https://www.tandfonline.com/doi/abs/10.1080/00167487.2006.12094149</p>	<p>ACKNOWLEDGED AND CLARIFIED. The attitude-behaviour gap has been mentioned in different sections showcasing that the attitudes and the consumer behaviours are not always aligned See for example section 9.6.1.5 and 9.6.2.8.</p>
706	6; 1723	<p>Consumers always indicate that they have insufficient information; however this does not mean that they will use the information if more/sufficient is available.</p>	<p>ACKNOWLEDGED.</p>
707	6.2.2 Criteria used when buying apparel; 1746	<p>An empirical study (N = 439) among German consumers on their perception of leather, related knowledge, and purchasing behavior provides additional relevant findings that can easily be read-across to textiles:</p> <p>Attributes of the product: natural appearance was rated among the most important attributes of leather products, while UV resistance, leather smell, and water resistance were rated less important. This is relevant because ecodesign requirements should limit the amount of hazardous chemicals used to give functions to textiles. The empirical results suggest that consumers will accept lower performance associated with lower chemical use because they have aesthetic priorities.</p> <p>Lack of knowledge about sustainability aspects in the supply chain: The majority of participants had limited knowledge about leather manufacturing, the currently missing transparency in the supply chains, and properties of leather products. For example, most expected “genuine leather” to be entirely free of plastic components. Many participants strongly agreed with the item “Most of the time, I do not know whether a leather product was manufactured in a way that is less harmful to environment and health.”</p> <p>https://www.frontiersin.org/articles/10.3389/frsus.2024.1351638/full</p>	<p>REJECTED. The indicated empirical study is focused on leather which is out of scope of this Preparatory Study. Therefore, the JRC position is not to apply the results of this study to the apparel categories currently under scope.</p>

ID	Stated section; stated line	Comment	Answer
708	6; 1755	There are more relevant aspects than durability Have a look at article 5 ESPR , needs clarification	<p>CLARIFIED.</p> <p>Durability has been highlighted as an example due to its link with apparel quality. Emphasizing durability does not imply that other ecodesign requirements are disregarded. Rather, it underscores the importance of durability as a key component of quality, which is a critical factor in consumer purchase decisions.</p>
709	6.2.2; 1761	<p>Product durability for garments is a core pillar in circular economy as enhancing physical durability will allow items to be recirculated and extend their lifetime .</p> <p>There is no common industry standard for durability, why performance requirements can serve as a basis to create minimum standards of quality. Furthermore, performance requirements can also serve as a safeguard to ensure that product requirements on other product aspects will not reduce the quality level of each product.</p> <p>Active since 2019, the Technical Secretariat has been working continuously on creating an industry standard for establishing the Product Environmental Footprint Category Rules for Apparel (PEFCR). While the final draft version is not expected before mid-2024 and we have only now seen the updated version, the durability measures developed by the Technical Secretariat are as close to an industry standard, we can come.</p> <p>However, the current detailed PEFCR thresholds regarding intrinsic quality are often the same for different product categories. This creates unnecessary complexity, and the subcategories should be simplified to make them fit for purpose. It can be done by for example aligning the subcategories with fabric groups (woven products, knitted products, denim, outerwear, and coated products and tailoring) or by defining subcategories based on the products functionality and maintenance process as this will also create a stronger</p>	<p>ACKNOWLEDGED.</p>

ID	Stated section; stated line	Comment	Answer
		<p>coherence with the durability tests (see recommendations below).</p> <p>A recent study concludes that the most common reasons for discarding products due to technical durability are pilling, color fading, fabric breakdown, accidental damage, and loss of dimensional stability .</p> <p>While quality standards can never be expected to account for accidental damage of the products, the other aspects can be looked at by prioritizing a simple, consistent, and yet impactful testing system by focusing on the following durability test through a risk-based approach:</p> <ul style="list-style-type: none"> - Appearance after wash, all textile products (ISO 15487), though only the ones tests related to durability (fabric aspects, accessories aspect damage, colour damage). Scope: final product. - Dimensional stability, woven products (ISO 6330 for domestic washing and drying procedures for textile testing, or ISO 3175 for prof. care, dry cleaning and wet cleaning, also according to the care label). Scope: final product - Dimensional stability, knitted products (ISO 5077 for determination of dimensional change). Scope: final product - Pilling, knitted products (ISO 12945-1). Scope: fabric - Pilling, woven products (ISO 12945-2). Scope: fabric - Fabric Tensile Strength (ISO 13934-1 or ISO 13934-2). Scope fabric - Fabric Bursting (ISO 13938-2). Scope: fabric 	

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		<p>Most failures will have appeared after washing based on 5 cleaning cycles for most products. This includes changes in dimensional stability, appearance, and decorations like print. Furthermore, the standard testing methods do not account for the use-phase, why garments that are washed without wear-testing are more prone to failing than a garment that is wear-tested, as it is not exposed to perspiration and moisture over time. The exposure to perspiration and moisture over time keeps the quality of the fabric. This is especially the case for natural fibers.</p> <p>Ensure a proportional information requirement on durability:</p> <p>Product durability for garments is a core pillar in circular economy as enhancing physical durability will allow items to be recirculated and extend their lifetime. Durability is defined as the ability of a product to maintain over time its function and performance under specified conditions of use, maintenance, and repair.</p> <p>For consumers, it is important to know what level of durability to expect from the product. This could be information on expectations like “does not shrink more than 5 pct” or “is not prone to excessive pilling” after X number of washes. To ensure consistency, these expectations must reflect the level of durability expected from performance requirements, especially if these go above and beyond.</p>	
710	6.2.2; 1761	<p>For Market Surveillance Authorities (MSAs), it is key to ensure proportionality between not setting up a bureaucratic and inefficient system, while maintaining efficient and sufficient control. Mandatory test-results for durability testing in the Declaration of Conformity would have immense consequences for the textile industry and for the enforcement, and it will expectedly have insignificant environmental value. Therefore, we do not recommend inclusion of mandatory test-results, as it will significantly increase the cost of a product and thereby affect the affordability, without necessarily ensuring less issues of non-compliance than a risk-based approach would provide. Also, the availability of testing capacities at</p>	ACKNOWLEDGED.

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		<p>either the suppliers with the proper testing facilities in-house or third-party testing facilities does not match the need that mandatory durability testing will create. Furthermore, small-scale brands or collections with fewer number of products produced will face difficulties gaining access to testing or to absorb the cost of durability testing.</p> <p>Information to the MSA should be a self-declaration for the products to live up to the minimum durability requirements for the product category, so the individual product type or model is not necessarily tested, but companies still declare that the products are capable of complying with the requirements. When products are being selected for compliance checks instead of verifying test results, the MSA should conduct their own testing - or ask the company to do so - from which the product can then either pass or fail.</p>	
711	6.2.2; 1761	<p>So, while requirements on the proposed product aspects (durability, recycled content, and recyclability) can have a potential to reduce environmental impact of a product, the impact potential is also determined by other important factors such as consumer behavior, and how much virgin fibers the recycled content is substituting.</p> <p>Additionally, key analysis' point to other significant impact drivers, which do not relate to the product design, but to the manufacturing processes related to yarn and fabric production and garment manufacturing.</p> <p>The World Resource Institute (WRI) suggest that the most significant climate impact drivers lie in the value chain by eliminating coal in textile mills and manufacturing facilities, shifting to 100 percent renewable electricity in manufacturing and maximizing energy efficiency . This is also supported by the JRC report on product priorities. In this report, JRC also ranks energy efficiency (life cycle energy consumption) as having the greatest impact with high improvement potential. The JRC also points to water effects, waste generation, climate change, material efficiency and lifetime extension as having high improvement potentials for the textile industry.</p>	ACKNOWLEDGED.

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		<p>Textiles produced in the EU are regulated by the Industrial Emission Directive, but most textile products are manufactured outside of Europe, why these are not covered by the directive and thus there is a policy gap. This policy gap can be facilitated by including measures of other policy instruments like trade initiatives to the framework of the EU Textiles Strategy. Trade initiatives can give favorable conditions for those countries that are succeeding in transforming production conditions to solutions with less environmental impact. This is further supported by an acknowledgement that setting ecodesign requirements on product aspects linked to the production can give unintended social consequences; brands may decide to withdraw from some production countries to favor others that might have a better access to certain energy infrastructure, like renewable energy, and stronger water management systems.</p> <p>Because of the complexity in the global value chains, it will hardly be enforceable to set ecodesign requirements on water use or energy efficiency for a product. Instead, an information requirement on the environmental footprint of a product will create transparency and prompt brands to address these impacts through collaboration with supply chain partners. An information requirement on environmental impact could be communicated through an environmental footprint, when understood as the “quantification of product environmental impacts throughout its life cycle, whether in relation to a single environmental impact category or an aggregated set of impact categories based on the Product Environmental Footprint method or other scientific methods developed by international organizations and widely tested in collaboration with different industry sectors and adopted or implemented by the Commission in other Union legislation” .</p> <p>However, methodologies for calculating the environmental footprint at a harmonized level is still underway and it is important to keep in mind that these tools have been developed for the voluntary use, thereby setting a high standard for introducing a holistic approach to environmental footprinting. This is exemplified through the Product Environmental Footprint Category Rules (PEFCR), which is only expected to be adopted in 2024.</p>	

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		<p>We support the intention to introduce information requirements for the environmental footprint, but we also acknowledge that there is no simple nor perfect solution available. The textile industry is only now embarking on collecting more and more primary data on the journey towards increasing traceability and transparency in the value chain, which is why there is still much to be developed and learned on the way.</p>	
712	6.2.2; 1761	<p>We are firmly determined to increase the use of primary data, but it will take time. To accelerate the development, the Commission to support this journey by developing guidelines and joint standards to have a common framework from which companies can work. This would also lessen the administrative burden for suppliers, who are often met with different data requests from customers to show compliance with the same legislation.</p> <p>A tool making it possible for the consumer to compare products is an important step in the right direction to introduce the concept, even if the available solutions are not perfect. Therefore, if the Commission intends to pursue the routes to introducing environmental foot printing, we recommend the Commission to consider the following key principles:</p> <ul style="list-style-type: none"> • Ensure data is valid and comparable. It is key that consumers and civil society trust an environmental impact score. Valid and comparable data is important for authorities to ensure compliance and measure progress on a sound data basis. • Production process data is in development. Currently, many of the facilities are improving the in-formation on product specific production processes and their energy use. This is an important step towards the transparency needed to assess the impact of a product. 	ACKNOWLEDGED.

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> • Start at facility level. Emission data at facility level, and not product specific process level can be used to estimate average supply chain data on product level. • Give preference to specific facility level data over secondary data. Specific facility level data is based on primary facility data, which is more accurate than secondary and average facility data. Legislation should therefore incentivize companies to collect specific facility level data as it is a key step toward achieving valid and comparably primary product data in the industry. • Prioritize to include the impact categories for Global Warming, Eutrophication, Water Scarcity and Water use. These have indicators and measurements that are well-established in the industry. 	
713	6.2.1; 1761	We would like to draw the JRC's attention to the need to educate consumers rather than simply inform them about environmental performance. We warn against communication in an aggregated ABCDE format which would not show the importance attached by consumers to different sub-aspects. A preliminary impact study on the effect of textile labelling on consumer behaviour is therefore recommended before the adoption of any regulation in this regard.	ACKNOWLEDGED.
714	6; 1762	What is meant by setting of classes of performance and why is this important in this report?	<p>CLARIFIED.</p> <p>As indicated in Regulation (EU) 2024/1781: 'class of performance means a range of performance levels in relation to one or more product parameters referred to in Annex I, which is established based on a common methodology for the product or product group, ordered in such a way as to allow for product differentiation'.</p> <p>The classes of performance in relation to one or more relevant product parameters, enable</p>

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			differentiation of products based on their relative sustainability. These classes of performance are important because they could be used by both, consumers and public authorities. As such, they are intended to drive the market towards more sustainable products.
715	6.2.3 User quality assessment of apparel: key insights; 1790	<p>An empirical study (N = 439) among German consumers on their perception of leather, related knowledge, and purchasing behavior provides additional relevant findings that can easily be read-across to textiles:</p> <p>A common concern among industry actors is that implementing traceability of materials requires complex technological systems and, thus, substantial financial investments. The study investigated consumers' Willingness To Pay for products whose supply chains including chemical ingredients is transparent. It shows that consumers are willing to pay more for leather products that have been manufactured in a way that is less harmful to environment and health and an additional premium if information concerning the supply chain is provided.</p> <p>https://www.frontiersin.org/articles/10.3389/frsus.2024.1351638/full</p>	<p>ACKNOWLEDGED.</p> <p>While the empirical study among German consumers on their perception of leather provides valuable insights, our focus has been on apparel in general. This study is specifically focused on leather, so the results are not directly applicable to the scope of our project, which encompasses a broader range of textile materials.</p>
716	6.2.3 page 67; 1801-1803	<p>We wholeheartedly agree. That is precisely why quality should extend beyond fabric resilience and conventional test standards, which often fall short in adequately capturing real-world usage and quality perceptions of end consumers.</p> <p>Moreover, this underscores the significance of handpanels. For instance, while numerous test methods and standards exist for evaluating softness, the equipment employed often fails to authentically replicate the human touch. Hence, the establishment of human panels was imperative, as they bridge this crucial aspect of haptics that cannot be effectively simulated otherwise.</p>	<p>ACKNOWLEDGED.</p>
717	6.2.3 page 67; 1804-1808	<p>Would you kindly provide clarification on how the conclusion was reached that only information requirements concerning durability and reliability are considered significant for consumers, given the facts presented? Quality encompasses more than just physical durability, and focusing solely on this aspect in setting performance and information requirements might inadvertently neglect other vital dimensions of quality. Should not</p>	<p>Acknowledged</p> <p>Comfort is not among the product aspects considered in the Ecodesign for Sustainable Products Regulation (ESPR). This information could be taken into consideration if there were</p>

ID	Stated section; stated line	Comment	Answer
		consumers also have access to information regarding comfort? Some materials may lead to the quicker development of unpleasant odors, while others may become uncomfortable over time due to mismatches with their intended use. It appears that these aspects are often overlooked. Could we explore the possibility of addressing these concerns as well?	objective ways to report comfort of a textile product. The authors invite the stakeholder to suggest ways to address comfort as an objective property of textile apparel.
718	6.2.2; 1809	<ul style="list-style-type: none"> • Reliability: Reliability is defined in the ESPR as “the probability that a product functions as re-quired under given conditions for a given duration” , but for textiles this sentiment is closely related to how durability is often perceived, why we suggest that any measures are taken under the durability product aspect. • Reusability; in the aspect of reuse, apparel and footwear is a relatively simple product which is easily re-used and any factors to support the preparation for reuse would be covered by the care label. 	ACKNOWLEDGED.
719	6.2.3; 1809	<p>Should an information on the environmental performance of products be implemented through ESPR, we call for the application of performance evaluation methodologies combining both an environmental and social scope and aiming at taking into account the specificities of each considered industry and product group. Indeed, we believe that promoting sustainable textiles must go hand in hand with a framework adapted to the high-end fashion sector and the diversity of its actors, taking into account key features such as holistic durability and quality, as suggested in the section.</p> <p>More precisely, we call for the consideration of the following four aspects: environmental impact, holistic durability, traceability, and social in the assessment of the performance of the product.</p> <p>Besides, it must be recalled that any assessment of the environmental performance / labelling on the environmental performance of textile products must necessarily be based on a reliable, robust, and accessible common database with shared governance and regular maintenance.</p>	ACKNOWLEDGED.
720	6; 1815	Question from the webinar: Are there additional evidence/surveys related to users’ attention to labels in general? Which are they?	REJECTED.

ID	Stated section; stated line	Comment	Answer
		<p>Answer:</p> <p>There are many studies on food related labels. They show that the nutri-score works best (due to colors etc.) but still it has a very small behavioral effect. It only improved purchase by 2.5%. httpDubois, P., Albuquerque, P., Allais, O., Bonnet, C., Bertail, P., Combris, P., ... & Chandon, P. (2021). Effects of front-of-pack labels on the nutritional quality of supermarket food purchases: evidence from a large-scale randomized controlled trial. Journal of the Academy of Marketing Science, 49(1), 119-138. Ikonen, I., Sotgiu, F., Aydinli, A., & Verlegh, P. W. (2020). Consumer effects of front-of-package nutrition labeling: An interdisciplinary meta-analysis. Journal of the academy of marketing science, 48, 360-383.</p>	<p>Thank you for your comment. Studies on how consumers pay attention to labels on food products are not applicable to our study, which focuses on apparel. Consumer behaviour factors in food purchases may differ significantly from those in apparel.</p>
721	6.2.4 Consumer behaviour towards labels on apparel; 1816	<p>An empirical study (N = 439) among German consumers on their perception of leather, related knowledge, and purchasing behavior provides additional relevant findings that can easily be read-across to textiles:</p> <p>The study assessed familiarity with labels (Öko-Text, BMZ. Grüner Knopf, Internationaler Verband der Naturtextilwirtschaft e.V., Blauer Engel, Global Organic Textile Standard). Consumers seem to be partly unaware of what product characteristics the respective labels represent: almost half of the respondents expected the STANDARD 100 by OEKO-TEX to certify actions to protect the environment. Yet, this label focuses on consumer protection while environmentally friendly manufacturing is out of the label's scope (see text footnote 8, respectively). Labels that comprise environmental aspects of manufacturing, for example, the IVN Leather Standard (see text footnote 10, respectively), were the least-known in our study. This illustrates that consumers are not well-versed with labels in the leather context</p> <p>https://www.frontiersin.org/articles/10.3389/frsus.2024.1351638/full</p>	<p>REJECTED.</p> <p>The indicated empirical study is focused on leather. Therefore, the JRC position is not to apply the results of this study to the apparel categories currently under scope.</p>
722	6; 1816-1817	<p>Reference needed, please add scientific proof.</p>	<p>CLARIFIED.</p> <p>Please, note the introduction in each subsection (from 6.2.1 to 6.4.4) are a result of the literature review carried out. Citations are contained in the paragraphs following the introduction of each subsection and also in the supporting information about user behaviour Section 9.6.</p>

ID	Stated section; stated line	Comment	Answer
			<p>In this particular case, the data points below the introduction of sub-section 6.2.4 demonstrate that while consumers may not currently pay high attention to all types of apparel labels, there is a clear expectation and desire for specific information regarding durability, reparability, and sustainability. This suggests that enhancing label information in these areas can play a significant role in shaping consumer behavior, influencing their perceptions of product quality and sustainability, and ultimately guiding their purchasing decisions.</p>
723	6.2.4; 1824	<p>Utopia.de investigated consumer's knowledge on labels Lost-im-Label-Dschungel_Utopia-Siegel-Studie-2022_Sneak-Preview-final.pdf (utopia-insights.de), https://utopia-insights.de/app/uploads/2022/10/Lost-im-Label-Dschungel_Utopia-Siegel-Studie-2022_Sneak-Preview-final.pdf (unfortunately in German) Further information can be requested at studie@utopia.de</p>	ACKNOWLEDGED.
724	section 6 - consumer behaviour; 1841	<p>We call upon EU regulators to ensure consistency in the required data on digital tool and call for inclusion in the upcoming work on the Digital Product Passport</p>	ACKNOWLEDGED.
725	6.2.5; 1844	<p>We need to know more about the second hand market. Is there any study showing that a higher price on new appareal would lead to a higher demand for second hand?</p>	<p>CLARIFIED. No studies have been found in this regard.</p>
726	6.2.5; 1844	<p>6. Are you aware of studies /surveys analyzing the apparel conditions upon collection from general waste and/or second-hand shops Which are they?</p> <p>We have an indepth study analysing textile and textilwaste from the housholds in the residual waste. https://www.naturvardsverket.se/globalassets/amnen/kretslopp-avlopp-avfall/avfallsslag/textil/plockanalyser-av-textilier-i-hushallens-restavfall-smed-rapport-2016-06-17.pdf</p>	<p>ACCEPTED. The indicated source has been cited in Section 9.6.3.1.</p>
727	6; 1851	<p>Second-hand buying does not replace new purchases: https://doi.org/10.1016/j.jclepro.2018.11.056</p>	CLARIFIED.

ID	Stated section; stated line	Comment	Answer
			<p>The reference has been cited in Section 9.6.2.10 on storage of apparel.</p> <p>In the shared scientific article it is indicated that ‘extending the lifetime of garments results in significant environmental savings mostly if production of new items is avoided (WRAP, 2017).’.</p> <p>References were not found in this study explicitly indicating that ‘second-hand buying does not replace new purchases’.</p> <p>In the Preliminary study line 1860 it is indicated that those consumers incorporating second-hand apparel tend to purchase fewer new items but it is not indicated that overall second hand purchases substitute completely purchases of new items.</p> <p>In fact, more references have been added indicating that the replacement rate may differ.</p>
728	6; 1870-1871	This doesn't cover all possibilities for reusability (e.g. refurbishment, repurpose etc.)	ACKNOWLEDGED.
729	6.2.6; 1872	<p>In the ESPR it is stated that “information on the presence of substances of concern in products is a key element to identify and promote products that are sustainable “.</p> <p>Union legislation on chemicals already exists and provides the common groundwork related to safety or risk. However, an information requirement in the ESPR can provide additional information to reduce significant risks to human health or the environment and the aim is to contribute to reducing the exposure of chemicals.</p>	ACKNOWLEDGED.

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		<p>For consumers and waste facilities, it is key to inform about certain chemicals that are known to be able to affect the health of humans and of our environment, even though the use of these chemicals is fully legal under EU law. This could be chemicals like Bisphenols or PFAS.</p> <p>For Market Surveillance Authorities, they should take the same approach to verify for compliance with an information requirement on substances of concern as provided through REACH.</p>	
730	6.2.6 Attitudes towards chemicals in apparel; 1872 - 1898	<p>[...] calls for clarification regarding what is the starting point for consideration and establishment of ecodesign requirements, when referring to the results of academic studies of quantitative nature.</p> <p>Referred by JRC studies quote that 60% of respondents perceive chemicals in apparel fabrics as minimally risky, with most not seeing them as a threat to people. The report at the end of the section at the same time addresses a potential to establishment of information requirements on the presence of substances, in particular substances of concern.</p>	<p>CLARIFIED.</p> <p>Multiple studies demonstrate that an improved understanding of environmental concerns can, although in a limited way, impact individuals' purchasing habits. Consequently, with information reported in sections such as 6.2.6 on attitudes towards chemicals in apparel, the JRC is interested in investigating how these insights might shape people's purchase and laundry/maintenance practices.</p> <p>The way this information will be used to set ecodesign requirements will be decided in the next milestones.</p>
731	6.2.6; 1872	<p>2. Are there additional evidence/surveys to enrich the literature used related to the user perception of chemicals present in apparel? Which are they?</p> <p>Design for recycling of products containing plastics (diva-portal.org)</p>	<p>Rejected</p> <p>The source does not provide information on user perceptions of chemicals in apparel. While it includes interviews with clothing retail participants, and additives were mentioned, no relevant references were found pertaining to user behaviour, chemicals and apparel as</p>

ID	Stated section; stated line	Comment	Answer
			such. If the JRC has overlooked something in these sections, please point it out for further review.
732	6.2.6; 1877 and 1885-1888	<p>The preliminary study includes a reference to a survey from 2009 which concludes that citizens perceive chemicals in apparel as minimally risky. [...] strongly disagrees with the conclusion that consumers are not concerned about chemicals in apparel and recommend replacing this reference with more updated surveys. For instance:</p> <ul style="list-style-type: none"> - Eurobarometer from 2020: 85% of respondents are worried about the impact on their health of chemicals present in everyday products (https://ec.europa.eu/commission/presscorner/detail/es/qanda_20_330). - CECU (December 2023): According to Spanish consumers, the restriction of hazardous chemicals in clothes is the second most important measure that policy makers should take after ensuring clothes are produced in fair conditions (https://cecu.es/notas/la-poblacion-espanola-apoya-prohibir-la-venta-de-ropa-que-contenga-sustancias-quimicas-y-aquella-fabricada-en-condiciones-injustas/). - A survey from Sveriges Konsumenter (2020) shows that 86% of Swedes would like to access information about the content of harmful chemicals in clothing at the time of purchase (https://www.sverigeskonsumenter.se/nyheter-press/nyheter-och-pressmeddelanden/ny-undersokning-konsumenter-oroade-for-kemikalier/). 	<p>PARTIALLY ACCEPTED.</p> <p>Information from these surveys has complemented but not replaced the information from the Eurobarometer survey from 2009.</p>
733	6.2.6; 1894-1898	<p>CLP and REACH Regulations are the pivotal pieces of legislation on safe use of chemicals in Europe. They are the instrument through which hazardous substances are identified and assessed to ensure they do not pose unacceptable risks for the environment and human health during their life cycle and especially their use, based on a prioritization process which is already well defined within REACH.</p> <p>ECHA, with its Risk Assessment Committee and Socio-Economic Committee, duly assesses single substances or group of substances referring to the various processes and products in which they are used, following specific processes for restriction and authorization that include room for consultation of external technical experts and other stakeholders. These</p>	<p>ACKNOWLEDGED.</p>

ID	Stated section; stated line	Comment	Answer
		<p>procedures lead to decisions on the possibility – or not – to use those substances and on the use conditions that grant safety for the environment, workers and consumers. REACH Regulation should remain the legal instrument to bring to these decisions.</p> <p>If the future Eco-design measures on textiles would include information for consumers on chemicals substances present in garments, they should refer to assessments and decisions on safety taken under REACH (e.g. possibility to use a substance in a production process or to have it present in specific products and under which conditions). ESPR should reflect this existing and upcoming chemical legislation within the EU.</p> <p>Connection and coherence among Eco-design regulation and REACH are considered fundamental.</p> <p>Concerning use of chemicals along the textiles value chain, EUCTL underlines the need to find a balance among the different objectives of measures on Eco-design; e.g. for some textile products, hazardous chemicals - that could also fall under the ESPR definition of Substances of Concern – are used during the production processes to grant durability/long lifespan to consumer products. Safe use of those chemicals should not be prevented and their contribution to the durability/eco-design of final articles should be recognized.</p> <p>Another aspect that should be considered when dealing with connections between Chemicals legislation and Eco-design legislation is that, in the future, textiles with a long lifespan could enter the recycling flow and contain chemical substances not permitted anymore when the product reaches its waste phase: solutions should be found not to exclude from recycling these textiles produced in full legal compliance in the past.</p>	
734	6; 1894-1898	We do not understand the conclusion on the proposal of information requirements on SoC based on the user perception towards chemicals explained in lines 1877-1893. The data	CLARIFIED.

ID	Stated section; stated line	Comment	Answer
		<p>show some concern about the health risk of apparel and the importance of buying apparel produced without harmful substances. This doesn't mean that consumers want to know the harmful substances present in the product but rather to ensure that products are safe. Could you please provide more clarity about the reasoning behind this conclusion?</p>	<p>The conclusion draws from the fact that ESPR is not the appropriate instrument for establishing limitations to chemicals in textiles due to, primarily their chemical risk. However, and information requirement will generate information about the presence of SoC in apparel textiles and based on this, potential restrictions could be proposed, as appropriate, e.g. under REACH.</p>
735	6.2.7; 1899	<p>3. Are there additional evidence/surveys to enrich the literature used related to the user perception of apparel made with recycled materials? Which are they?</p> <p>Design for recycling of products containing plastics (diva-portal.org)</p>	<p>Rejected</p> <p>The source does not provide information on user perceptions of apparel made with recycled materials. While it includes interviews with clothing retail participants, no relevant references were found pertaining to user behaviour and perception of apparel made with recycled materials. If the JRC has overlooked these sections, please point them out for further review.</p>
736	6.2.7; 1904	<p>The preparatory study highlights the existing evidence with regards to consumer preferences for recycled material content. This reality calls for defining ecodesign requirements in a manner that will foster an enabling environment for textile-to-textile recycling that makes the waste hierarchy a reality. Such an enabling environment calls for ecodesign requirements that foster pre-recycling techniques, such as disassembly, and ambitious recycled content targets that do not only reflect the importance of ambitious percentages of recycled content but also consider the origin of the recycled content. A study conducted by Resortecs on ambitious recycled content targets and their feasibility in the EU indicate that 4% of recycled content target are attainable with the current textile waste collected in EU today (2024) with 38% mean value of textile waste collection rate in Europe. Upon mandatory separation of textile waste and with 100% textile waste collection rate, recycled content generation from only mono-material waste will be 14%. If multi-material garments are disassembled and prepared for recycling, the target percentage of recycled content in new circular products could reach 43% for cotton and polyester.</p>	<p>ACKNOWLEDGED.</p>

ID	Stated section; stated line	Comment	Answer
737	6.3; 1915	Microplastic release and consumers' awareness & willingness to use washing bags/filters etc. could be considered to overall reduce microplastic release. Even though the effectiveness of such solutions needs to be investigated as well.	ACCEPTED. A new section on consumer awareness on microplastic release during washing cycles has been included in the Preparatory study.
738	6.3.1 User behaviour during use: laundering practices; 1916	<p data-bbox="483 429 1496 643">Laundering and care are important for the overall environmental impact, both because it has an environmental impact in itself, and because it affects the lifespan. We know that there are large regional and national differences in this area also within the EU (Laitala, Klepp, & Henry, 2017). There are many different factors that affect washing results and environmental impacts, but of these, washing frequency is one of the most important (Laitala, Klepp, Kjeldsberg, & Eilertsen, 2011), which is influenced by fibre (Laitala, Klepp, Kettlewell, & Wiedemann, 2020).</p> <p data-bbox="483 743 1496 927">Developing better washing habits is therefore both useful and possible. In this work, both the products (textiles, white goods and washing chemicals), their labelling, and knowledge among consumers can contribute. Likewise, better storage practices for clothes in use, more use of alternative cleaning methods (Laitala, Klepp, & Henry, 2017), and less fabric softeners and other unnecessary chemicals, can be promoted with environmentally positive results.</p> <p data-bbox="483 1027 607 1051">References</p> <p data-bbox="483 1152 1413 1273">Laitala, K., Klepp, I. G., & Henry, B. (2017). Global laundering practices. Alternatives to machine washing. <i>H&PC Today – Household and Personal Care Today</i>, 12(5), 10-16. Retrieved from http://www.teknoscienze.com/tns_article/global-laundering-practices-alternatives-to-machine-washing/</p> <p data-bbox="483 1310 1485 1401">Laitala, K., Klepp, I. G., Kettlewell, R., & Wiedemann, S. (2020). Laundry care regimes: Do the practices of keeping clothes clean have different environmental impacts based on the fibre content? <i>Sustainability</i>, 12(18), 7537. doi:10.3390/su12187537</p>	<p data-bbox="1518 429 2036 584">PARTIALLY ACCEPTED. The information contained in the first paragraph was already stated in section 9.6.2 on post-purchase aspects: the user behaviour during use.</p> <p data-bbox="1518 620 2007 711">Nonetheless, the indicated references have been cited in the report with the intention to support the presented evidence.</p>

ID	Stated section; stated line	Comment	Answer
		Laitala, K., Klepp, I. G., Kjeldsberg, M., & Eilertsen, K. (2011). Consumers' wool wash habits - and opportunities to improve them. Project note no. 8-2011. Retrieved from Oslo: http://www.sifo.no/files/file77731_prosjektnotat_nr_8-2011.pdf	
739	6.2.7; 1924	<p>Applying a definition of recycled content with to narrow a focus will impede the uptake of recycled content and thus slow down the transition towards a more circular economy, which is why a definition on recycled content must include waste from other waste streams as well as the inclusion of not only post-consumer waste, but also post-industrial and pre-consumer waste. This is not only a question of availability, but also to the level of impact and traceability as well as tackling the risk of legacy chemicals in post-consumer waste</p> <p>However, to reach the level of emission reduction needed, it is important to broaden the scope to scaling sustainable materials and practices overall and accelerate the development of innovative material. Thus, we suggest broadening the scope to include materials with an impact as low or even lower than recycled content – so called sustainable renewable materials.</p> <p>While acknowledging that the Ecodesign for Sustainable Products Regulation (ESPR) is mostly focused on what requirements to put in place for the product itself, there are multiple reasons why setting requirements on product level will be extremely complex. There is the number of different materials and trims, discrepancies between calculation methods, but also – and most importantly – the function of the product itself and the recyclability of a product.</p> <p>Many companies are already tracking their raw material or fabric consumption at portfolio level. Minimum requirements on a portfolio level would therefore enable faster adoption and achievement of even ambitious levels. If companies are given the freedom to operate and base the inclusion of recycled materials at portfolio level on considerations like availability of materials, longevity, or functionality of the garment, it would enable the</p>	ACKNOWLEDGED.

ID	Stated section; stated line	Comment	Answer
		<p>companies to have a higher uptake of recycled materials, than what is possible through a product level approach. It will be easier to direct a higher amount of recycled materials to the product types that can more easily absorb such high volumes.</p> <p>Minimum requirements at portfolio level would also leave room to balance considerations for functionality and longevity, while ambitious requirements would still work as a driver to ensure the inclusion of recycled content for the circular transition and to counter climate change.</p>	
740	6.3.1; 1926-1951	<p>You could add the t-shirt article here, because the result of that indicated, that by reducing washing (and drying) you can reduce up to 30% of environmental impacts. But this holds the assumption, that the shirt is actually used by several hundreds of times, instead of 25 times, or something very low as that (and also requires it to be a polyester t-shirt, for the endurance).</p>	<p>Clarifications needed from the stakeholder</p> <p>The context of this comment remains unclear. Clarification needed.</p>
741	6; 1957	<p>There are numerous studies and papers available that demonstrate how various laundry practices can significantly impact environmental factors, particularly in terms of microfiber loss rates.</p> <p>Here are some useful studies on the subject:</p> <ul style="list-style-type: none"> • Pirc et al. (2016). Emissions of microplastic fibers from microfiber fleece during domestic washing • Zambrano et al. (2019). Microfibers generated from the laundering of cotton, rayon and polyester based fabrics and their aquatic biodegradation. • Fontana et al. (2020). Assessment of microplastics release from polyester fabrics: The impact of different washing conditions • Lant et al. (2020). Microfiber release from real soiled consumer laundry and the impact of fabric care products and washing conditions. • Celik (2021). Domestic laundry and microfiber pollution: Exploring fiber shedding from consumer apparel textiles. 	<p>ACKNOWLEDGED AND CLARIFIED.</p> <p>The phrase in line 1957 has been modified accordingly.</p> <p>These studies will be considered in the corresponding analysis on microplastic and microfiber release.</p>

ID	Stated section; stated line	Comment	Answer
		<ul style="list-style-type: none"> • Vassilenko et al. (2021). Microplastic Release from Domestic Washing. • De Falco et al. (2018). Evaluation of microplastic release caused by textile washing processes of synthetic fabrics. • De Falco et al. (2019). The contribution of washing processes of synthetic clothes to microplastic pollution. • De Falco et al. (2020). Microfibre release to water, via laundering, and to air, via everyday use a comparison between polyester clothing with differing textile parameters. • De Falco et al. (2021). Washing load influences the microplastic release from polyester fabrics by affecting wettability and mechanical stress. • Sillanpaa and Sainio. (2017). Release of polyester and cotton fibers from textiles in machine washing. • Cesa et al. (2020). Laundering and textile parameters influence fibers release in household washings. • Choi et al. (2021). Analysis of Microplastics Released from Plain Woven Classified by Yarn Types during Washing and Drying. • Wang et al. (2023). Microplastic Fiber Release by Laundry: A Comparative Study of Hand-Washing and Machine-Washing. 	
742	6.3.2; 1966	The main reasons why consumers cut the labels according to a survey from Ginitex is because the label itches (74%) and causes skin irritation (55%).	<p>CLARIFIED.</p> <p>The GINETEX survey indicates: “62% admit cutting them out: for 74% of them, the labels itch and irritate their skin and for another 55%, they are often too long and uncomfortable”. This data is correctly reported in Table 70 of the Preparatory Study.</p>

ID	Stated section; stated line	Comment	Answer
			55% refers to those survey participants who considered labels been too long or uncomfortable.
743	6.3.1; 1981	Simple care instructions like washing instructions should be introduced through the revision of the TLR for the physical label, but for information on e.g. energy efficiency it should be assessed whether a digital label or the more detailed product passport would be the best convener of information to the consumer. However, if included as an information requirement it is highly recommended to ensure that the rules of the TLR and the ESPR are complementary. Refurbishment is understood in the ESPR as actions to restore the performance or functionality, but in practice for garments this is equal to maintenance/care or repair.	ACKNOWLEDGED.
744	6.3.1; 1981	Simple care instructions like washing instructions should be introduced through the revision of the TLR for the physical label, but for more developed information on the product's environmental impacts, it should be assessed whether a digital label or the more detailed product passport would be the best convener of information to the consumer. However, if included as an information requirement it is highly recommended to ensure that the rules of the TLR and the ESPR are complementary. Refurbishment is understood in the ESPR as actions to restore the performance or functionality, but in practice, for garments, this is equal to maintenance/care or repair. Also, please be aware of the connection between a "digital label" and the "DPP" to avoid overlap of information and overflow of information for the consumer.	ACKNOWLEDGED.
745	6.3.2; 1985	For simple care information, we support introducing harmonised rules for care information for the physical label, but for more detailed information on e.g. energy use etc., this should be included in the digital product passport.	ACKNOWLEDGED.
746	6.3.2; 1985-1987	<p>[...] strongly opposes replacing physical labelling by digital labelling. Digital labelling can provide complementary and more detailed information than physical labels, but they should not replace physical labels. Consumers should be able to easily access essential information to make informed choices and take good care of their clothes:</p> <ul style="list-style-type: none"> • Accessibility of essential information physically ensures a high level of consumer protection (European Court of Justice, 2020). • Digital labelling does not allow simple comparison between products. It is unrealistic expecting consumers to consult QR codes when they take purchase decisions in a few 	ACKNOWLEDGED AND CLARIFIED. The user behaviour section does not indicate that physical labelling will be replaced by digital labelling. Additionally, this is out of the scope.

ID	Stated section; stated line	Comment	Answer
		<p>seconds, or when washing and ironing their clothes.</p> <ul style="list-style-type: none"> • Challenges for data protection and targeted advertising if need for constant access to brands' websites. • Digital information is intangible and can complicate investigations of non-compliance by authorities. <p>https://www.beuc.eu/sites/default/files/publications/beuc-x-2021-016_why_moving_essential_product_information_online_is_a_no-go.pdf</p>	
747	6.3.3; 1988	<p>[...] would like to suggest that the analysis of the preliminary study includes references showing that consumers are increasingly interested in repairing their products. For instance:</p> <ul style="list-style-type: none"> - CECU (2023): 52%,3% of Spanish consumers repair or bring clothes to repair (52,3%) (https://cecu.es/notas/la-poblacion-espanola-apoya-prohibir-la-venta-de-ropa-que-contenga-sustancias-quimicas-y-aquella-fabricada-en-condiciones-injustas). - A representative survey in Austria AK Wienn and Greenpeace (2022) shows support among Austrians for repairable or recyclable clothing (83%), government subsidies for repairs (79%) and minimum legal requirements for the durability of clothing (66%) (https://wien.arbeiterkammer.at/interessenvertretung/konsument/Sustanaible_Fashion_Consumption_in_Austria.pdf) <p>Moreover, Repair can be less attractive for consumers as it competes with the cheap prices of fast fashion garments. This is illustrated by investigations from consumer organisations in the [...] network such as Tudatos Vásárlók Egyesülete in Hungary (https://tudatosvasarlo.hu/kirandulas-kabat-nadrags-bakancs-sator-javitas/) and CECU in Spain (https://cecu.es/wp-content/uploads/2022/11/Encuesta_Informe-sobre-conductas-de-consumo-y-reparabilidad.pdf).</p>	<p>ACCEPTED. Reference to CECU study from 2023 are now included in Section 9.6.2.9 on repairing.</p>
748	6; 1988	<p>Most cloths are too low in quality to be worthwhile to be repaired, as new defects can arise easily. Also new items are too cheap: https://doi.org/10.1016/j.jclepro.2020.125644</p>	<p>ACKNOWLEDGED. The illustrated repair motivation and barriers with the factors that affect people's repair behaviour is interesting but not specific to apparel, even if it could apply in some ways.</p>

ID	Stated section; stated line	Comment	Answer
			Nonetheless, this paper has been cited in Section 6.3.3 and 9.6.2.9 on Repairing.
749	6; 1988	Relevant background research Laitala, K., Klepp, I. G., Haugrønning, V., Throne-Holst, H., & Strandbakken, P. (2021). Increasing repair of household appliances, mobile phones and clothing: Experiences from consumers and the repair industry. <i>Journal of Cleaner Production</i> , 282, 125349.	ACKNOWLEDGED AND CLARIFIED. References to this study are already included.
750	6.3.3 Reparability; 1989 – 2031	<p>As long as we have had textiles, they have been repaired. Why does the EU want to "make clothes repairable"? When weren't textile products repaired? Or what clothes aren't? In the preparatory study document, it is as if it is taken for granted that this is something that must be required or changed. But is it? Likewise, there is a question of what "spare parts" and what type of repair instructions are going to be attached to the products, and the environmental impact of those. Clothing can be repaired with many different techniques, one can repair a piece in many different ways, as such there is no one "guide to correct repair" (line 2028). This is unhelpful, suggesting that there is a binary of good or bad when it comes to repair. Rather what is right is dependent on the person's knowledge and also the desired result.</p> <p>Certainly repair is important. The main reason why apparel is not repaired is its low value (not least financially) and also lack of knowledge. Few people will repair something if it costs more to do so than the cost of a new product. Increasing the value of clothes and textiles is absolutely central to driving up repair rates. Price increases are important for other reasons as well - to "make fast fashion out of fashion", production volume reduction is key.</p> <p>Strengthening commercial repair can be done through consumer rights. Using differentiated commercial guarantees (e.g. ten years for a coat and four years for a dress, and specifying what "normal use" is) would also increase the commercial market for repair. (Laitala, Klepp, Haugrønning, Throne-Holst, & Strandbakken, 2021; Laitala, Løvbak Berg, & Strandbakken, 2023)</p>	<p>PARTIALLY ACCEPTED.</p> <p>Regarding the reparability of textiles, while it is true that textiles have historically been repaired, the EU's focus on "making clothes repairable" aims also to address modern challenges. Some apparel could be made with complex materials and construction techniques that make traditional repairs difficult or impractical. By emphasizing reparability, it can be ensured that new textiles are designed with repair in mind. This aligns with the broader goal of increasing the value of apparel, thereby driving up repair rates and reducing the volume of production.</p> <p>Incorporating detailed repair instructions and spare parts into clothing design can support this goal. While it's true that there are many ways to repair an apparel item, having standardized guidelines, indicating what 'normal use' is, could help ensure that repairs are effective and prolong the life of the apparel. This does not negate the value of individual knowledge and creativity in repair but provides a baseline to make repair more accessible to a broader audience.</p>

ID	Stated section; stated line	Comment	Answer
		<p>References</p> <p>Laitala, K., Klepp, I. G., Haugrønning, V., Throne-Holst, H., & Strandbakken, P. (2021). Increasing repair of household appliances, mobile phones and clothing: Experiences from consumers and the repair industry. <i>Journal of Cleaner Production</i>, 282, 125349. doi:10.1016/j.jclepro.2020.125349</p> <p>Laitala, K., Løvbak Berg, L., & Strandbakken, P. (2023). Why won't you complain? Consumer rights and the unmet product lifespan requirements. Paper presented at the 5th Product Lifetimes and the Environment (PLATE) Conference, Espoo.</p>	<p>Hence, reference to Laitala et al., has been included both in Section 6.3.3 and Section 9.6.2.9 on reparability.</p>
751	6.3.3; 2023	<p>Reparability can be considered as a feature of durability (as stated in section 3.1.1 line 420) as it contributes to increasing the product lifespan. However, we warn against the implementation of reparability performance requirements in a way that could lead to an “over-normalization” of textiles products. Any reparability performance requirement must be considered in light of pre-existing repair services implemented by stakeholders which, in the case of high-end fashion actors, are set to preserve the high quality and authenticity of their products, as well as with the craftsmanship techniques used in such products. Thus, the implementation of a reparability requirement based on compatibility with “standards” spare pieces such as zips or buttons would be detrimental to the specificities and qualities of high-end fashion products.</p> <p>For further considerations on reparability, see PEFCR v2.0, Section 3.3.4 pages 55-60 (reparability index based on repair cost, spare parts, repair services and repair communication.)</p>	ACKNOWLEDGED.
752	6.3.3; 2027	<p>Regarding the information on reparability that could be included in the Digital Product Passport, consideration must be given to dedicated after sale services for reparability developed by high-end fashion stakeholders, increasing, as a result, the durability of their products.</p>	ACKNOWLEDGED.
753	6; Question Are you aware	<p>Factors affecting user’s emotional attachment to apparel: fiber composition (some fibers makes the product favourable for specific usages, for example, a 100% cotton T-shirt is for</p>	ACKNOWLEDGED.

ID	Stated section; stated line	Comment	Answer
	of product design strategies to promote user's emotional attachment to apparel?	daily usage, but when it is combined with modal, it may be more suitable for office wear, etc.) fabric design (for example, some fabric designs are best for summer wear), colorings (matte colours are mostly used in winter collections etc.), timeless design (classic designs have usually long lifespans), use of accessories etc. A consultation with designer offices will be helpful, but we need time to get their answers.	Thank you for indicating this. However, the information shared would need supporting evidence and/or scientific references in order to be considered in the Preparatory Study.
754	6; 2057	Question webinar: Are you aware of studies/surveys analyzing the apparel conditions upon collection from general waste and/or second-hand shops? Which are they? Answer: 18% of the textile collected via separate collection can be reused. Most common reason for poor quality textile is pollution of the textile during collection due to water or other garbage entering the bin. https://vang-hha.nl/publish/pages/216378/wegwijzer-textiel.pdf	ACKNOWLEDGED AND CLARIFIED. Thank you for sharing this source. However, the JRC is mostly interested in the apparel conditions resulting from consumer's use.
755	Answer to question 6 from the first online stakeholder consultation (19th March 2024); Are you aware of studies/surveys analyzing the apparel conditions upon collection from general waste and/or second-hand shops? Which are they?	WRAP (2022) Composition of textiles in Wales: https://wrapcymru.org.uk/resources/report/composition-textiles-wales This report emphasises the correlation between the method of textile collection and the reusability of the collected textiles. For instance, in Wales, the reusability rate of textiles collected via container stands at 75.3%, compared to 54.6% for those gathered through door-to-door collection.	ACCEPTED. The shared reference has been included in Section 9.6.3.2.

ID	Stated section; stated line	Comment	Answer
756	6.4; 2057	Same as comment to line 1655, I believe to wording "disposal" leads the reader to think of waste rather than of second hand market options. The word appears at several places in the report, please consider replacing it.	ACKNOWLEDGED
757	6.4.1; 2060-2085	A large part of the clothing which is disposed of is still functionally usable, but there is nobody who wants to use it. Part of the problem with large waste quantities is that consumers buy more clothing than what they actually have a need or use for. Marketing strategies are part of the explanation why this is and should be considered among the reasons why clothing is being disposed.	ACKNOWLEDGED AND CLARIFIED. Section 9.6.1.1 states the aspects affecting the purchase decision of apparel among consumers which could be influenced by discount offers that stimulate impulsive purchases. No studies have been found indicating the direct correlation between the influence of marketing and the disposal rate.
758	6.4.1 Reasons for the disposal of apparel; 2070-2071	We have observed that your statement "Common reasons for disposal of apparel include material defects due to wear and tear, inappropriate size, loss of shape, and no longer liking the item" is substantiated by only one reference. We would like to inform you that the peer-reviewed study titled "Revealing the management of municipal textile waste and citizen practices: the case of Catalonia" (https://www.sciencedirect.com/science/article/pii/S0048969723067207?via%3Dihub) can also support your statement. Within the Supplementary Data of the article, we recommend consulting Table C2, code 01, where the primary reasons for clothing disposal among citizens from Catalonia, Spain, are detailed. Notably, old and worn clothes, no longer liking the item, and inappropriate size emerge as the most prevalent reasons, in line with your statement.	ACCEPTED. The shared reference has been included in Table 31 and Table 76.
759	6.4.1 Reasons for the disposal of apparel; 2071, 2084 and 2091 (Table 31)	There are several good reasons for intensifying the work on fit in ESPR. Fit problems are much more than a problem with internet sales (line 2183). Equally important in developing better fit, are grading systems and labelling schemes, including their control. The problem with sizing and fit has also been recognised in WRAP's work with Clothing Durability, as SCAP members agreed that "the single most important design factor in extending a garment's life expectancy is its cut" (Anthesis & WRAP, 2015). Fit is one of the three main reasons for clothing disposal (Laitala & Klepp, 2022). This has been documented by several studies from different countries and using different research methods, all showing the same: a lot of clothes are disposed of because they do not fit the	Partially accepted Indeed, fit issues are not only a cause of returns. This has been highlighted in other sections of the Preparatory Study (9.6.1.3 Quality assessment of apparel, 9.6.2.10 the storage of apparel and 9.6.3.1 reasons for the disposal of apparel).

ID	Stated section; stated line	Comment	Answer
		<p>owner's body. This problem is more prevalent among women and children than men. Further, the problem is more frequent among those needing larger sizes (Laitala, Klepp, & Hauge, 2011; Otieno, Harrow, & Lea-Greenwood, 2005).</p> <p>There are several reasons for poor fit, and SIFO has contributed with this type of knowledge, also mentioning that more knowledge is needed (Laitala, Hauge, & Klepp, 2009, 2010, 2012; Laitala, Klepp, & Hauge, 2011). A PhD on this topic is just defended in Denmark (Terkildsen, 2024). The problems include:</p> <ol style="list-style-type: none"> 1. Poor size labelling caused problems by lack of standardisation and inaccurate or insufficient information or incorrect labelling 2. Inadequate pattern construction. The current way of developing sizing systems based on one key measurement leads to a suitable fit only for a minority. Clothing patterns and grading systems should be based on recent anthropometric studies and correspond to specific body types. 3. Lack of availability of ready-to-wear clothing in a variety of sizes and fits that the population uses. Greater variety should be available. The importance of this is increasing in the EU with increased immigration (of other body types) alongside obesity problems and that we are growing all in all, also in height. 4. Lack of opportunities for adjustments. Bodies also change in different life stages, and well-fitted clothes can adapt to such changes. Elastic materials provide flexibility, but this can also be achieved through good cut and not through the use of elastane - which creates other environmental problems. <p>We therefore propose that the work with ESPR is aimed at fit problems. Emphasis should be placed on women's clothing. The updated standard should be made mandatory (NEN-EN 13402-3), or it should become a minimum requirement which standard is used and this should be made clear. Which measures the standard actually uses must also be made more easily accessible so that incorrect use of the standards becomes easier to uncover. This relates particularly to complaints where fit is the reason for consumers to return products,</p>	

ID	Stated section; stated line	Comment	Answer
		<p>as several recent media stories have uncovered the hidden environmental impact of internet returns; and that we know many order several sizes in a hope that one will fit.</p> <p>Anthesis, & WRAP. (2015). Sustainable Clothing Technical Report: Clothing Durability Report. Retrieved from Banbury: http://www.wrap.org.uk/sites/files/wrap/Clothing-Durability-Report-final.pdf</p> <p>Laitala, K., Hauge, B., & Klepp, I. G. (2009). Large? Clothing size and size labeling (2009:503). Retrieved from Copenhagen: https://www.norden.org/en/publication/large-clothing-sizes-and-size-labeling</p> <p>Laitala, K., Hauge, B., & Klepp, I. G. (2010). "If I don't fit into size medium, I refuse to try on a larger size. I am not large!" Gender, clothing sizes and ideals of beauty. <i>Fashion Theory: Dress, Body, Culture</i> (Russian edition)</p> <p>Laitala, K., Hauge, B., & Klepp, I. G. (2012). "Sizes are arbitrary, you can't trust them" A study of the relationship between size labeling and actual clothing sizes. In P. McNeil & L. Wallenberg (Eds.), <i>Nordic Fashion Studies</i> (pp. 201-220). Stockholm: Axl books.</p> <p>Laitala, K., & Klepp, I. G. (2022). Review of clothing disposal reasons. Retrieved from https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/</p> <p>Laitala, K., Klepp, I. G., & Hauge, B. (2011). Materialised ideals: Sizes and beauty. <i>Culture Unbound: Journal of Current Cultural Research</i>, 3, 19-41.</p> <p>Otieno, R., Harrow, C., & Lea-Greenwood, G. (2005). The unhappy shopper, a retail experience: exploring fashion, fit and affordability. <i>International Journal of Retail and Distribution Management</i>, 33(4), 298-309. Retrieved from http://www.ingentaconnect.com/content/mcb/089/2005/00000033/00000004/art00006</p> <p>Terkildsen, M. (2024). To [Fit] In Danish Fashion: Impact Engineer-ing – Towards Inclusive FIT and Sizing On the Foundation of Body Logic. https://arts.au.dk/en/news-and-</p>	

ID	Stated section; stated line	Comment	Answer
		events/events/show/artikel/phd-defence-msc-mette-terkildsen-to-fit-in-danish-fashion-impact-engineer-ing-towards-inclusive-fit-and-sizing-on-the-foundation-of-body-logic	
760	6.4.1; 2072	..desire for something new due to changing consumer needs: this gives an idea that consumer needs change spontaneously and are not manufactured needs achieved by marketing. Consumers are held responsible for something they do not have a control of.	<p>PARTLY ACCEPTED.</p> <p>The phrase in line 2072 has been deleted due to lack of clarity.</p> <p>However, the reference to the paper from Klepp and Grimstad, (2001) has been maintained in Section 9.6.3.1 because it shows the results of a study which indicates that the second reason for disposal is that the owner of the apparel item may be tired of the product and wants something new due to new consumer needs.</p> <p>The JRC is not including any interpretation of the data, and whether the abovementioned consumer needs are a result of marketing.</p>
761	6.4.1; 2076	<p>While evidence shows that consumers buy more clothes than they need, research also indicates that consumers would wear their clothes for longer if they were of better quality:</p> <p>- AK Wienn study in 2014 found out that Austrian would like a longer lifespan and use time of their clothes than actually achieved (https://www.researchgate.net/publication/315054627_SMARTPHONES_ARE_REPLACED_MORE_FREQUENTLY_THAN_T-SHIRTS_Patterns_of_consumer_use_and_reasons_for_replacing_durable_goods).</p> <p>- OVAM (2021) showed that consumers would wear their clothes longer if they were in better shape.</p>	<p>PARTIALLY ACCEPTED.</p> <p>The OVAM reference has been added to Section 9.6.3.3 where related statements on consumers declaring ‘the willingness to wear clothes longer if they were of better quality’ were already included.</p>
762	6.4.1 Reasons for the disposal of apparel; 2091	<p>We propose strengthening Table 31 by incorporating an additional reference. The peer-reviewed study titled "Revealing the management of municipal textile waste and citizen practices: the case of Catalonia" (https://www.sciencedirect.com/science/article/pii/S0048969723067207?via%3Dihub) offers insights into the main reasons for disposal within the context of Catalonia, Spain. Integrating this reference would broaden the geographical coverage of the data presented in the table, as Spain is currently not represented. Furthermore, this reference is the most</p>	<p>PARTIALLY ACCEPTED AND CLARIFIED.</p> <p>The shared reference has been included in Table 31 and Table 76. .</p> <p>However, no value has been added to the ‘intrinsic quality’ reason for disposal because the respondent’s answer</p>

ID	Stated section; stated line	Comment	Answer
		<p>recent one, being published in 2024, and its results stem from a survey conducted between March and April 2022. Notably, it stands as the sole reference encompassing post-COVID-19 findings.</p> <p>Information from the suggested reference for filling Table 31 in the draft can be found in the Supplementary Data of the proposed article, specifically in Table C2 under code O1. Aligning with the column headings of Table 31 in the draft and incorporating data from the recommended study, the results would be as follows: Country -> Spain (Catalonia Autonomous Community); Intrinsic quality -> 65.1%; Fit issues -> 44.1%; Perceived value -> n/a; Fashion changes -> 21.5%; Other -> 2.5%.</p>	<p>corresponding to 65.1 % specifies 'clothes were old and worn' which may not only encompass a 'intrinsic quality' issue.</p>
763	6.4.1; 2091	<p>Information technology, represented by consumers' smartphones, has had a major impact on consumption, transfer, and disposal behavior, and it is important to refer to materials from after the spread of mobile commerce (in the mid-2010s).</p> <p>For information on personal transactions of apparel using Mobile devices, please refer to the following;</p> <p>Alves, L.; Faria, P.M.; Cruz, E.F.; Lopes, S.I.; Rosado da Cruz, A.M. Eco-Gamification Platform to Promote Consumers' Engagement in the Textile and Clothing Circular Value Chain. Sustainability 2023, 15, 5398.</p> <p>https://doi.org/10.3390/su15065398</p>	Acknowledged
764	6.4.2 Disposal channels; 2110-2121	<p>Between lines 2110 and 2121 you present the correlation existing between the proportion of apparel collected separately and the average quality and value of apparel discarded in residual waste. The peer-reviewed study titled "Revealing the management of municipal textile waste and citizen practices: the case of Catalonia" (https://www.sciencedirect.com/science/article/pii/S0048969723067207?via%3Dihub) may suppose an additional evidence to support your statement related to the average quality.</p> <p>1500 citizens from Catalonia, Spain, were surveyed regarding their textile waste disposal practices. Findings indicate that garments perceived to be in better condition are typically</p>	<p>ACCEPTED.</p> <p>The shared reference has been included in Section 9.6.3.2 on disposal channels for apparel.</p>

ID	Stated section; stated line	Comment	Answer
		<p>disposed of in specialized street containers for textile waste (78%), with minimal disposal in mixed-fraction containers (3%). Conversely, when textiles are in worse condition, citizens exhibit uncertainty regarding disposal methods, with approximately 30% disposing of them in specialized containers and another 30% opting for mixed-fraction containers (see Figure 2 from the article). Therefore, the population's decision regarding the disposal destination of unwanted apparel is influenced by the perception of the quality the item may still possess. Such perception determines whether used textiles will be valorized through reuse and recycling (as they have been discarded in separate containers), or ultimately disposed of through incineration or landfilling (as they have been thrown in the mixed fraction).</p> <p>Moreover, the proposed analysis also correlates citizens' disposal choices with the fact that disposing of textiles in a separate container is not perceived as a waste management practice but rather as a charitable gesture of donation. The historical and cultural context, coupled with the existing communication surrounding separate collection containers aiming to receive higher-quality clothing, play a significant role in fostering citizens' misconceptions.</p>	
765	6.4.2; 2114	<p>It is very important to include the communication of collectors/ sorting businesses towards the public, when researching household decisions on how to dispose of garments. Usually public textile collectors print on their collection containers that only intact, usable clothing shall be handed in. The reason ist obvious. These collectors are private businesses which earn money by selling 2nd hand goods. They are legally obliged to recycle also collected broken textiles, but this creates costs for them rather than earnings. It is understandable that they want to reduce the amount of broken textiles and increase the amount of reusable/re-sellable garments. This explains their communication towards consumers.</p> <p>Most consumers follow this, which results that most broken garments end up in residual waste.</p> <p>This is an important reason for "the households' discerning decisions" (2114) to discard low-quality textiles in residual waste. Most consumers believe that it is not allowed to turn low-quality and broken garments into the public textile collections, because they are told so!</p> <p>Municipalities should not rely on private companies to take care of "textile recycling"</p>	<p>ACKNOWLEDGED AND CLARIFIED.</p> <p>This is outside the scope of the Preparatory Study for textiles.</p>

ID	Stated section; stated line	Comment	Answer
		<p>without giving them financial support to take care of the textile waste.</p> <p>An important aspect when creating "information requirements [which] may guide consumers and public authorities towards more sustainable choices when disposing of apparel..." (2123ff) will be to first consider banning such communication when collecting old garments.</p>	
766	6.4.3; 2127	<p>At the workshop, some stakeholders referenced a norwegian study to support the argument for emotional durability. We have looked into these numbers and are highly critical of the inference made between the research question in the survey in question being "what are the most important reason you have discarded clothes in the last year" with the response category being "I do not use it" and that this is emotional durability.</p> <p>As explored in the JRC report, the issue of emotional durability is much more complex than that.</p> <p>Also, we recommended looking at the following project: https://www.designforplanet.dk/toolbox/user-cards/ as part of the ReSuit project (https://www.designforplanet.dk/projects/resuit/), which we have included in our (internal) circular design guide; https://bestseller.com/media/rkgh22nz/bestseller-circular-design-guide-2023.pdf</p>	<p>ACKNOWLEDGED.</p> <p>The authors did not find some project materials on the website. The website is also not easy to navigate, to find the right information for the Preparatory Study.</p>
767	6.4.3; 2127	<p>Person-product attachment & emotional durability: changing trends weaken these and is therefore planned obsolescence of clothing / textiles, again marketing creating need for the new products.</p>	<p>ACKNOWLEDGED.</p>

ID	Stated section; stated line	Comment	Answer
768	6.4.3; 2127	Emotional durability: There are various factors influencing the life span of the product, that is to say the emotional durability. These are using of blended fabrics, the quality (rather than durability) of fabric, used accessories etc. For example, a %100 cotton T-shirt may have a short life span, but a T-shirt with a blended artificial fibers and not suitable for recycling yet may have a longer life span. Consumer surveys are needed to be done and focus group meetings with stakeholders may be needed as this is a new approach from textile engineering point of view.	ACKNOWLEDGED.
769	6.4.3; 2127	7. Are you aware of any product design strategies to promote user's emotional attachment to apparel S.-Lindberg-Consumers'-perceptions-acceptance-of-material-design-choices.-Mistra-Future-Fashion-1.pdf (mistrafuturefashion.com)	ACKNOWLEDGED AND CLARIFIED. Useful source but does not contain product design strategies to promote user's emotional attachment to apparel.
770	6.4.3; 2128	On emotional durability see the note "towards a holistic vision of durability" forwarded by email as well as Vanacker, H.; Lemieux, A.-A.; Bonnier, S. Different dimensions of durability in the luxury fashion industry: An analysis framework to conduct a literature review. J. Clean. Prod. 2022, 377, 134179, https://www.sciencedirect.com/science/article/abs/pii/S0959652622037519?via%3Dihub Our federation calls for further study (consumer survey, marketing research etc.)on product attachment / emotional durability and is keen to be associated to any discussions or work on this topic.	ACKNOWLEDGED. The cited reference has been added in Section 9.6.3.3 on person-product attachment.
771	6.4.3; 2154	-◆ We welcome with the approach taken in the draft preparatory study regarding non-physical durability. We believe it plays a fundamental role in the longevity of the apparel. However, given the lack of research and scientific evidence, it is premature to regulate non-physical durability under eco-design requirement still to create a meaningful policy and avoid negative or unimpactful consequences for the textile industry	ACKNOWLEDGED
772	6.4.3 person-product attachment; 2154 - 2156	Emotional Durability: Sympatex believes that emotional durability, while potentially advantageous for powerful brands, should not discriminate against SMEs or newcomers. Costly and impactful marketing tactics should not serve as alternatives to eco-compliance. It is essential to ensure that emotional durability does not merely extend shelf life (respectively "wardrobe life") through longer storage periods rather than actual usage. Instead, the focus should be on the duration of wear, not simply the time between purchase and disposal.	ACKNOWLEDGED.

ID	Stated section; stated line	Comment	Answer
773	6; 2154	Indeed, as correctly reported in the document, emotional durability is not measurable. Ecodesign requirements shall remain feasible and based on a solid scientific rationale. How can manufacturers comply with non-measurable requirements? How do you expect to set KPIs on emotions?	ACKNOWLEDGED AND CLARIFIED. The design options will be proposed in the following milestones.
774	6.4.3 Person-product attachment; 2162-2164	<p>All these strategies rely on an assumed decline in production to have a positive environmental effect. An early review of such strategies showed that their effect had not been empirically validated (Maldini & Balkenende, 2017), and a comparative field study of regular ready-made garments and personalised garments (made with input from users) showed that such special garments were not used more frequently, were not kept for longer, and did not lead to a reduction in demand from users (Maldini et al., 2019). Although assumptions about the environmental value of special garments dominate the literature, international data shows that second-hand garments are used fewer times than new items, and self-made clothing was worn less than tailored garments (Laitala et al., 2024).</p> <p>While emotional durability sounds like an attractive proposition when considering how to reduce environmental impacts of clothing products, invoking notions of meaning making, memory, attachment to a product and therefore suggesting that if a garment is held on to and not discarded; there is no evidence that such a relationship translates into lower environmental impact overall or reduces the likelihood of purchasing of additional items. The evidence that does exist suggests that there is no 'one size fits all' approach to the behaviours that people engage around long-lasting clothes, with the result that liking a product (feeling an 'emotional connection' with it) can result for example in some people wearing a garment often and for a long time and others wearing it rarely in order to preserve it, and buying other pieces to use frequently instead. Even if it was effective in delivering impact reduction (for which no evidence exists), this variability means that emotional durability does not lend itself to being described in specific, achievable, relevant terms that lends itself to regulation.</p> <p>Further, while emotional durability and associated behaviour traits of long-lasting products is often seen as something that can be 'designed in' in the product design and</p>	<p>PARTIALLY ACCEPTED.</p> <p>While product-person attachment has not been consistently proven to reduce consumption, it can influence how long consumers keep and use apparel. Therefore, even if it varies widely among consumers and is not easily quantifiable, the impact of emotional durability is recognized in the Preparatory Study as a variable and should not be seen as a one-size-fits-all approach.</p> <p>The reference Maldini and Balkenende has been included in Section 9.6.3.3.</p>

ID	Stated section; stated line	Comment	Answer
		<p>conceptualisation phase of product development; design is widely recognised as a weak force in creating relationships, associated memories, etc. that a wearer goes on to associate with a piece of clothing (Fletcher, 2016). Many factors influence how long a product is used more than design, such as easy availability of new alternatives, marketing, price. Not only that, but there is no evidence that owning one meaningful garment prevents the acquisition of further pieces. Introducing regulation around emotionally durable design would not tackle the substantive sustainability challenge facing the textile and clothing sector, that of rising product volumes. Emotional durability is not an effective intervention point in driving environmental change for textiles and clothing.</p> <p>We suggest therefore, that the ongoing work concentrates on what actually leads to positive change, rather than continuing to base itself on vague concepts that it is hard to ascertain if they actually have an environmental impact. The aspects that this term (emotional durability) includes can be better included in other terms such as Duration of Service, which includes all reasons why something is used. It is also possible to approach it through the use of the essential disposal reasons. Perceived value, together with intrinsic quality (wear and tear-related issues) and fit, are the main reasons for disposal (Laitala & Klepp, 2022). Perceived value is less “emotional” and contains important topics, such as price and quantity, and is therefore more effective in interventions towards change and regulation.</p> <p>References:</p> <p>Fletcher, K. (2016). <i>Craft of use : post-growth fashion</i>. Abingdon, Oxon: Routledge.</p> <p>Laitala, K., & Klepp, I. G. (2022). Review of clothing disposal reasons. Retrieved from https://clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/</p>	

ID	Stated section; stated line	Comment	Answer
		<p>Laitala, K., Klepp, I. G., & Løvbak Berg, L. (2024). The impact of modes of acquisition on clothing lifetimes. In K. Niinimäki (Ed.), <i>Recycling and Lifetime Management in the Textile and Fashion Sector</i> (pp. 91-111). Boca Raton: CRC Press.</p> <p>Maldini, I. (2019). From speed to volume: reframing clothing production and consumption for an environmentally sound apparel sector. In N. F. Nissen & M. Jaeger-Erben (Eds.), <i>Proceedings of the 3rd PLATE conference</i> (pp. 519–524). TU Berlin. https://doi.org/10.14279/depositonce-9253</p> <p>Maldini, I., & Balkenende, R. (2017). Reducing clothing production volumes by design: a critical review of sustainable fashion strategies. In C. Bakker & R. Mugge (Eds.), <i>PLATE. Product Lifetimes and the Environment</i>. (pp. 233–237). Delft University of Technology and IOS Press. https://doi.org/10.3233/978-1-61499-820-4-233</p>	
775	6.4.4; 2165	<p>Regarding returns, the dedicated report published by the EU Environment Agency.</p> <p>Volumes and destruction of returned and unsold textiles in Europe’s circular economy EEA、2024</p> <p>https://www.eea.europa.eu/publications/the-destruction-of-returned-and</p>	<p>ACCEPTED. The report is now correctly cited.</p>
776	6.4.4; 2177	<p>The EEA study is now published and available on https://www.eionet.europa.eu/etcs/etc-ce/products/etc-ce-report-2024-4-volumes-and-destruction-of-returned-and-unsold-textiles-in-europes-circular-economy</p>	<p>ACCEPTED. The report is now correctly cited.</p>
777	6.4.4 page 75; 2197-2199	<p>Is there data to support the claim that durability issues are the primary reason for returns? What is the ratio between used and used items in clothing returns? Why is consumers’ expectation of quality solely linked to physical durability? Quality encompasses various comfort-related features such as fit, sensorial comfort and thermal comfort. In this report, there appears to be a false assumption that durability alone justifies quality requirements. Scientific studies indicate that consumers prioritize natural fibers and comfort (References 1, 2), yet this aspect is not emphasized in the report alongside durability. A plethora of scientific studies explaining methods to assess comfort in textiles are readily accessible. By focusing exclusively on physical durability (fabric resilience), there is a risk of pushing the industry towards increased use of fossil-based synthetic fibers. While these fibers may be more resilient, they may not necessarily be suitable for prolonged wear in many textile</p>	<p>PARTIALLY ACCEPTED. The Preparatory Study emphasizes durability as a critical aspect of quality but does not suggest it as the sole determinant. Quality in textiles encompasses multiple factors, including comfort, sustainability, and consumer preferences, which are also important considerations alongside durability. A paragraph along these lines has been added.</p>

ID	Stated section; stated line	Comment	Answer
		<p>applications due to their drawbacks, such as non-absorbency. For casual wear, especially close to the skin, natural fibers may be a more suitable choice. It is important to consider and regulate these aspects comprehensively.</p> <p>[Reference 1] Schytte Sigaard A and Laitala K. Natural and sustainable? Consumers' textile fiber preferences. <i>Natural Fiber Competitiveness and Sustainability 2023</i>: 11 (2).</p> <p>[Reference 2] Song G 2011 <i>Improving comfort in clothing</i> (Woodhead Publ. Ltd.) ISBN 1845695399</p>	

10 Comments on section 7 – Current EU Ecolabel criteria for textile products

Table 12. Comments on section 7 – Current EU Ecolabel criteria for textile products

ID	Stated section; stated line	Comment	Answer
778	7; 2200-2304	<p>[...] welcomes that the EU Ecolabel will be looked at in synergy with the ESPR. The EU Ecolabel is an important certification that sets high, ambitious standards for companies that live up to the required criteria.</p> <p>It is important to recognize, that while there is an increase in licenses and products, the vast majority of producers and retailers in the textile industry are not using the EU Ecolabel. The arguments, as listed in the PS (bureaucratic and very time-consuming application processes, unclear guidelines, lacking data) are partly the reason for this. [...] however sees a potential in the rise for the EU Ecolabel.</p> <p>Include traceability criterion [...] sees it fit to include traceability as a supplying criterion for the EU Ecolabel, to enhance transparency in the supply chain. Set different criteria for retail and the industry As mentioned in a previous section, manufacturers and retailers often work differently and have different environmental impacts. It would therefore be beneficial to introduce different criteria.</p>	Acknowledged
779	7; 2200	<p>We would like to reinforce that EU Ecolabel criteria (representing the most ambitious product on the market) will be voluntary and not mandatory - ecodesign requirements under the Delegated Act will be mandatory and would need to be verified.</p>	Acknowledged
780	7; 2200-2305	<p>In 2022, there were 13,549 GOTS certified entities around the world (the 2023 Annual Report, to be published shortly, shows an increase). 28% of these are in Europe. These certified entities produce, trade and retail many thousands of products: apparel/fashion, home/interior textiles, personal care products. Consequently it is a label for organic textiles that already has an impact in the market place that is growing, and is increasingly recognised by consumers.</p> <p>GOTS provides an approach to respond to some of the suggestions on how to improve the EU Ecolabel criteria:</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>> It is a simple process,</p> <p>> It harmonises with other Type 1 Ecolabels,</p> <p>> It uses third-party certification that proves compliance with the criteria laid out in GOTS and thus streamlines the verification process,</p> <p>> Through the process of Scope and Transaction certificates for each stage of the supply chain, from raw fibre to finished product, it enables and relies upon the retrieval of supply chain actors, whether inside or outside the EU,</p> <p>> GOTS enables the alignment with the many of the ecodesign requirements developed in the framework of the ESPR.</p> <p>It is therefore would be a simple approach to revise the criteria of the current Ecolabel criteria for textile products within the ESPR to specifically refer to organic textiles, defined as made from fibre produced on an organic farm and processed according to an appropriate standard. Provided that the Textile Names and Labelling Regulation (1007/2011) is amended to specify 'organic' as a specified term, this aspect of the ESPR would be effectively covered, and result in a positive impact.</p> <p>More information on the detailed tables provided in</p> <p>> Comment 7 Sections 9.4.2 Table 56; Section 9.7.3 Table 82, 84, 86)</p> <p>> Comment 8 Section 9.7.3 Table 87</p> <p>The inclusion of organic textiles (comprised of organic fibre produced on an organic farm, and processed according to an appropriate standard) would be in line with the revision of the EU Ecolabel criteria within the framework of the ESPR. It would complement the ecodesign requirements, would increase the ambition of the ESPR, for example by restricting hazardous chemicals, it would also consider and cover ethical</p>	

ID	Stated section; stated line	Comment	Answer
		<p>and social aspects. This would have a positive impact and is a scalable approach.</p> <p>Table 33 shows the scope of three Ecolabels used the most in the EU. A comparison of these, with GOTS for Apparel, home/interior textiles and personal care products should be completed as the PS is further developed.</p>	
781	7; General	We suggest that the commission investigates barriers to EU ecolabel certification, such as time spent actively and passively on the administrative process associated with applying for the ecolabel and to which extent this can prevent or deter the applicant from acquiring the ecolabel in the first place.	Acknowledged
782	7.1; 2209	[...] agrees with the JRC findings that the EU Ecolabel is not very popular among textile companies and is not known by consumers. The label should be promoted among consumers to boost demand and therefore the incentives by companies to use the label.	Acknowledged
783	7; 2210-2303	<p>Currently, textile and clothing companies are not using Nordic Swan and EU Ecolabel, mostly because it is costly, and the application processes are challenging. For example, Nordic Swan in Finland is mostly used for furniture and bedding products (regarding products with textiles) whose design remain the same for years and certain ecolabel is required for public procurements.</p> <p>We support the renewal of EU Ecolabel and the alignment with the ESPR.</p>	Acknowledged
784	7.1; 2212	Will that number decrease if requirements become more ambitious? Is the aim of the new ecolabel to award only very few products or should it become a widespread sign which is also known by consumers? There might be conflicting goals. No opinions on Ecolabel of consumers were collected in this study.	Acknowledged The EU Ecolabel criteria will be built on the ecodesign criteria.
785	7.1 page 76; 2221	The number of items awarded the EU Ecolabel is notably low when considering the abundance of products available on the market.	Acknowledged
786	7; 2225-2288	<p>Question Webinar: Which are your views on the revision of EU Ecolabel criteria in light of the new Ecodesign framework?</p> <p>Answer: [...] supports a uniform, European mandatory sustainability label/ecolabel for textiles. This sustainability label should serve to provide consumers with reliable,</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		comparable and understandable information. In addition, the sustainability label encourages manufacturers to make the textiles they offer on the market more sustainable. [...] supports a label with information about sustainability in accordance with the information requirements for textiles that are imposed on textiles under the Ecodesign for Sustainable Products Regulation, increasing the ambition level set by the ESPR. We also think it is positive that the ecolabel considers ethical and social aspects where appropriate.	
787	7.2 - Suggestions for the revision of the EU Ecolabel criteria; 2225	<p>Based on our limited knowledge of the EU Ecolabel, [...] does not agree with the proposal that the EU Ecolabel is the frontrunning label for textile products in the EU because it will leave out other certification schemes that are creating benefits in the textile industry. As we recognize the benefits of creating a single label for consumer recognition, having a singular label in the marketplace limits room for innovation within standards and certifications.</p> <p>The EU Ecolabel has a narrow jurisdictional scope that may potentially leave out globally applicable standards.</p>	Acknowledged
788	7; 2231	Industry players, all along the value chain, should be included in the revision work.	Acknowledged The registration as stakeholder is open to any entity.
789	7.2; 2249	<p>We support the intention for the EU Ecolabel, as we can see how the scheme can work to increase the consumer trust and limit greenwashing.</p> <p>Discussing with our brand as users and supplier as license holder, we have two different aspects to consider;</p> <ol style="list-style-type: none"> 1) Process related issues 2) Feedback for requirements 	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>1) Process related issues are experienced as being the main barrier for expanding the use of EU Ecolabel:</p> <ul style="list-style-type: none"> - Response times are too long for the textile industry as it is difficult to align with production timing and long response time, why provisions on maximum response times are needed. - The need for guidance does not correspond to the guidance offered; to increase the uptake of the EU ecolabel in the textiles sector especially local guidance in production countries is needed - Better control measures and verification of data to increase trust in the validity of the label. Trust in the ecolabel is decreasing due to the lack of verification of data. <p>2) Requirement related feedback</p> <ul style="list-style-type: none"> - The availability of fibre-to-fibre recycled, especially post-consumer, content is not at a scale where it is feasible to limit requirements for recycled content. - However, we support limiting e.g. the requirements for cotton to organic cotton. - Especially for chemicals, our supplier have experience a very long approval period - a supplier that use GOTS/Oekotex approved chemicals. If third party certifications of chemical use can make the approval process significantly shorter, this would be highly appreciated. 	
790	7.2.; 2249	Line 2249, The environmental effects of products during use may also be included in the criteria. Ecolabel applications for semi-finished and final product groups with reduced environmental impacts during use/dispose (longer lifespan, requiring less washing, releasing less microfibers, biodegradability in specific conditions etc.) may be encouraged.	Acknowledged
791	7.2; 2252 2269	Concerning hazardous chemicals, labels delivered by third parties, such as OEKO-TEX®, could be used to prove compliance with innocuousness of materials and environmental aspects of textile production. This procedure is already applied on the PPE sector covered by the 2016/425 Regulation.	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>Concerning ethical and social aspects, these are also covered in the OEKO-TEX® STeP certification.</p> <p>Recognition of third-party documents will allow companies to reduce the costs of the assessment procedure and reduce the evaluation timeline.</p>	
792	7.2; 2252	Using (more) third-party certifications to prove compliance with the criteria for chemicals in the ecolabel would require to specify whether the third-party certifications must be made for each batch, or whether they are valid for a longer time period e.g until the production line changes. An alternative to third-party certifications could be that the producer shows a list of all chemicals used in the production.	Acknowledged
793	7.2; 2256	The EU Ecolabel should be based on the ecodesign criteria in delegated acts (e.g. having the same criteria but with higher levels) and since the ecolabeling is voluntary EU Ecolabel has a great opportunity to adopt environmental criteria related to the very production phase. If aiming for improved production from where the major environmental impact stems this is a must. EU Ecolabel criteria regarding production (for example water and energy use) could for example be based on/be inspired by BREF and BAT conclusions.	Acknowledged
794	7.3 Revision of EU Ecolabel criteria within the ESPR framework; 2257-2288	It is very important to keep consistency amongst all relevant proposals and make sure an harmonious legislative landscape is created. [...] urges careful consideration and alignment of legislative proposals related to Environmental Single Market for Products (ESPR), ecolabel, and Green Public Procurement (GPP). It is imperative they are coherent and straightforward to implement to ensure their effectiveness and impact. By ensuring alignment, duplication and inconsistencies can be avoided. This approach will also enhance clarity for stakeholders and facilitate smooth implementation.	Acknowledged
795	7 Current Ecolabel criteria for textile products; 2273	<p>Regarding cotton and the EU ecolabel, we think that organic cotton is preferable to IPM cotton. "Organic" means controlled and certified according to strict requirements and clearly established rules, such as: no use of synthetic pesticides and no use of synthetic nitrogen fertilizers, whereas IPM has no set of established rules, is not controlled and certified, and allows the use of synthetic pesticides and fertilizers.</p> <p>We believe it makes little sense to require 95 % organic cotton versus only 60 % IPM cotton. Putting 95 % strictly controlled and high standard, versus 60 % uncontrolled and low standard, as two equivalent and interchangeable alternatives for an ecolabel product is misleading to the consumer. It gives a clear disadvantage to organic, which is already following strict standards and would, on top of that, have to be included in a</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		much higher percentage. (refer to Textile Fibre Criteria, Criterion 1. Cotton and other natural cellulosic seed fibres (including kapok), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014D0350-20201201).	
796	7.3; 2274 2279	<p>Concerning product physical durability, [...] pilotes a collective study on physical on durability, "DURHABI". The aim is to propose robust recommendations to evolve standardisation and define a shared methodology for evaluating the physical durability of textile products.</p> <p>The project involves 80 French and European brands from fast-fashion to luxury, textile laboratories and an academic collaborator.</p> <p>Over 70 000 tests were performed on 12 categories of products : Tee-shirt, Underwear, Swimwear, Trousers and short, Shirt and blouses, Sweater and midlayers, Dress and skirts, Jacket and coats, Stocking and socks, Textile accessories, Bedding, Household linen.</p> <p>Tests are based on EN and ISO standards, products are analysed as received and after cleaning cycles. Tests include, for example, mechanical resistance, colour fastness, visual aspect...</p> <p>Results of the DURHABI study will be available summer 2024 and will be shared with the European standardisation working group "TC248 WG39". These results will feed the European standard on durability.</p>	<p>Acknowledged</p> <p>The authors invite the stakeholder to share the study as soon as it will be completed.</p>
797	7.3; 2277	<p>The section explains that the methodology of the EU Ecolabel, which currently sets requirements for different type of fabrics, needs to change to align with a suggested approach for Ecodesign, that would establish requirements for different functional groups and not for fabrics.</p> <p>While [...] believes that synergies between Ecodesign and the EU Ecolabel are necessary, we do not support that the EU Ecolabel would no longer set requirements per type of fibres. BEUC strongly recommends further investigating the option of setting minimum requirements at fiber and fabric level and complement/adapting them with product specific criteria tailored to different functionalities of the end products.</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
		<p>This approach has been applied by the Nordic Swan Ecolabel which in addition to minimum requirements for different fibres has introduced diverging criteria for different subgroups of apparel or home/interior textiles.</p> <p>Currently the EU Ecolabel criteria require companies to obtain primary data for different manufacturing processes, while replacing this approach with the Product Environmental Footprint method would entail use of secondary data offering less possibilities for differentiation of products of environmental excellence.</p>	
798	7; 2283	Recycled content demands, if and when they are made, should be set for products, at the end of the value chain, so that economic actors can optimise the solutions best suited to systems and applications.	Acknowledged
799	7.3.; 2284	Line 2284-2288, Type of yarns used not only related with the type of garment but also aesthetics (drape etc) of the product, season or touch.	Accepted The text was updated
800	7.3 Revision of EU Ecolabel criteria within the ESPR framework; General Lines 2273 and 2274	When reviewing the EU Ecolabel criteria within the ESPR framework, we recommend that the JRC take a holistic approach to avoid repeating the mistakes observed in the development of the Product Environmental Footprint Category Rules for Apparel and Footwear. We have already alluded in previous comments the shortcomings of the PEF, such as omitting to include an indicator for plastic waste and the shedding of microplastics, as well as not fully taking into account positive environmental impacts such as circularity in the form of biodegradability. Furthermore, we have demonstrated the lack of evidence on physical durability and the duration of service. Any EU Ecolabel criteria regarding physical durability should be based on new research and not depend on physical strength lab tests. If the same mistakes from the PEF are repeated, only products made out of polyester will be granted an EU Ecolabel, consequently increasing microplastic pollution and plastic waste. This will undermine the EU's goal of putting fast fashion out of fashion.	Acknowledged
801	7.4; 2292-2294	The labels (Blue Angel and Nordic Swan Ecolabel) under consideration are currently not very popular.	Acknowledged The authors invite the stakeholder to provide data and references of market penetration of voluntary environmental labels.

ID	Stated section; stated line	Comment	Answer
802	7.4; 2305	While the definition of technical textiles (298) refers to complex functional products, providing fire retardancy, insulation, lightness, resistance, the definition here refers to cleaning product which are very simple products. An alignment of definitions is crucial. Cleaning cloths and textiles for food wrapping might have to fulfill different criteria.	Acknowledged

11 Comments on section 8 – Public procurement and current EU voluntary Green Public Procurement criteria

Table 14. Comments on section 8 – Public procurement and current EU voluntary Green Public Procurement criteria

ID	Stated section; stated line	Comment	Answer
803	8 Public procurement and current EU voluntary Green Public Procurement criteria; 2,312 ff.	<p>From our perspective, the analysis of public procurement of textiles should be significantly be expanded. For the national level in Germany exists a “Measurement program for Sustainability”. This program includes one textile related measure: “Implementation of the sustainability criteria in public procurement contained in the "Federal Government Guidelines for Sustainable Textile Procurement in the Federal Administration"as a necessary prerequisite for achieving the goal of increasing the proportion of publicly procured textiles to 50 percent (excluding special textiles).”</p> <p>(see Measurement programm for Sustainability, Appendix 1, p. 2). The guideline (in German) can be found here: https://www.bmz.de/resource/blob/147140/leitfaden-nachhaltige-textilbeschaffung.pdf</p> <p>This guideline addresses three levels: end product verification, manufacturing of the product, fibres. For these three levels we formulated different criteria and recommend them as technical specifications or awarding criterion.</p> <p>For the end product level we have 8 criteria that should be applied as technical specifications: General exclusion of substances with certain properties, Exclusion of pesticides in the end product based on cotton and other natural cellulose fibers (incl. kapok), Exclusion and limitation of formaldehyde in the end product; Limitation of extractable heavy metals; Limitation of nickel and its compounds; Exclusion of perfluorinated and polyfluorinated chemicals (PFCs) in membranes and laminates; Exclusion of chlorine bleach; Limitation of dimethylformamide, dimethylacetamide and N-methylpyrrolidone.</p> <p>For the manufacturing process of textiles, we recommend to use some criteria as technical specification (TS) and some as award criteria (AC): Exclusion of perfluorinated and polyfluorinated chemicals (PFCs) in membranes and laminates (TS), Use of nanomaterials (TS), Exclusion of flame retardants (TS), Exclusion of poorly degradable sizing agents, complexing agents and surfactants (TS), Limit values for the discharge of wastewater from wet treatment (TS), but also a few that could be applied as award criteria, Exclusion of certain colorants and textile auxiliaries one</p>	<p>Acknowledged</p> <p>Further steps of the study will address the public procurement.</p>

ID	Stated section; stated line	Comment	Answer
		<p>criteria as TS and one criteria as AC) and Limitation of air emissions in the textile finishing process steps (AC).</p> <p>The fibre related criteria mostly include one criteria formulated as a technical specification and one more ambitious criteria that is formulated as award criteria. In general, the guidelines includes criteria for: cotton, wool, acryl, elastane, and polyester, man-made cellulose fibers and polyamide.</p> <p>Moreover, the German Environment of Agency also has guidelines for the procurement of textiles. The guidelines are recommendations and can be applied by all public procurers. In comparison to the above explained Guideline the guidelines of the German Environment Agency includes significantly more criteria</p> <p>(see here: https://www.umweltbundesamt.de/publikationen/leitfaden-zur-umweltfreundlichen-oeffentlichen-35 and https://www.umweltbundesamt.de/publikationen/leitfaden-zur-umweltfreundlichen-oeffentlichen-34).</p> <p>The basis of all these mentioned guidelines is the Blue Angel for Textiles that is also available in English. (see: https://produktinfo.blauer-engel.de/uploads/criteriafile/en/DE-UZ%20154-202301-en-criteria-V3.docx.pdf)</p> <p>Similar to the scope of the EU Ecolabel we recommend to extend the scope for mandatory GPP criteria by home and house textiles. In this area the procurers at the national level have good experiences.</p> <p>Please get in contact with Member State representatives and make use of expert groups of the EU COM. Maybe the Administrative Cooperation Group (AdCo) for textiles could give advice on further suitable contacts.</p>	
804	8; 2312-2393	<p>[...] welcomes that criteria for the public sector are being introduced as mandatory, and that they will be aligned with the ESPR framework.</p> <p>It is also positive that they are based on the existing voluntary GPP criteria. Harmonising criteria for the public sector is crucial and will have a positive effect on the competition with regards to sustainability. It will also set important requirements for the customers and create a better competition for tenders.</p> <p>However, it is crucial to keep in mind the special conditions that companies supplying the public sector are working under. The requirements that they have to live up to must be concrete and practically realizable and be effectful. The new criteria that will be introduced must be effectful and not just for the reporting's sake. It should also match what</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>the public sector actually requests and that can be delivered upon. This is why a market and customer dialogue is of high importance. It is crucial to clarify what to do when suppliers cannot provide the needed data that is important for transparency reasons.</p>	
805	8; 2312-2392	<p>We support mandatory EU green public procurement criteria. Currently, there are too many different requirements for different tenders, and a more harmonized set of requirements is needed.</p> <p>It should be noted that certain ecolabels may be mandatory for public procurement products, such as Nordic Swan and EU Ecolabel.</p>	Acknowledged
806	8; 2312	<p>Additional relevant EU project -</p> <p>Several reports on workwear and procurement within the ECAP project: http://www.ecap.eu.com/resources/</p>	Acknowledged
807	8. Public procurement and current EU voluntary Green Public Procurement criteria; 2312	<p>Use of public procurement to optimize collection and sorting.</p> <p>[...] advocates for the inclusion of a social dimension in the mandatory criteria for green public procurement of textiles, encouraging public authorities to collaborate with social enterprises. This approach not only promotes circular purchasing but also supports local communities by fostering job creation and skill development among groups traditionally marginalised in the labour market. For instance, reserving tenders specifically for textile collection can effectively ensure that textile waste management aligns with the waste hierarchy.</p> <p>We recommend that the JRC consider the model set by the Spanish “Law on Waste and Contaminated Soil for the Circular Economy”, which mandates that social enterprises handle 50% of the overall collection, transport and treatment of textiles (https://rreuse.org/new-spanish-law-mandates-50-of-tenders-to-social-and-circular-enterprises/). Integrating employment targets and promoting reuse initiatives led by social enterprises into the mandatory public procurement criteria for textiles would affirm the legislation’s recognition of the inclusive and circular benefits provided by social enterprises. Additionally, adopting the proximity principle in public procurement could further strengthen the integration of environmental and social criteria in public tenders.</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>On the other hand, the EU Commission’s Strategy for Sustainable and Circular Textiles recommends “prioritising products with the highest potential and impact in terms of environmental sustainability”. In this context, it is crucial to prioritise the procurement of reused products. Public procurement policies should emphasise purchasing reused goods, as opting for a used textile item over a new one can reduce its carbon footprint by 82%.</p> <p>To learn more about [...]’s position on public procurement, please refer to this position paper: https://reuse.org/wp-content/uploads/2023/04/reuse-position-paper-on-public-procurement.pdf</p>	
808	8; 2314	<p>If the PS needs to "provide the scientific and technical basis for the future development of the possible EU GPP requirements for textile products" this chapter is not providing this scientific and technical basis due to lack of data. Crucial is what is mentioned under line 2321 that monitoring public procurement is currently a challenging task. This is an understatement. No meaningful data for future development is available. The amount of public procurements of textiles is useless information. Improvements in monitoring should be f.i. made for the actual use of GPP criteria in the procurements mentioned and the amount of garments (workwear) being purchased (not the amount of procurements). It could be a recommendation to include the GPP criteria as a mandatory field in the Tendersnet.</p>	<p>Acknowledged Further steps of the study will address the public procurement.</p>
809	8; 2317	<p>In general, we see setting green criteria for public procurement a good way of creating market for sustainable textiles, this is however a strong tool. We thus want to highlight that the chosen sustainability criteria have to be holistic and science-based. Before setting the criteria, there should be an impact analysis.</p>	<p>Acknowledged Further steps of the study will address the public procurement.</p>
810	8.1 Public procurement in the EU; 2319-2326	<p>[...] would like to underline here the work done by Assosistema, its Italian national association, on the issue and which could be used as an example.</p> <p>Following crucial advocacy, an Italian decree (DECRETO 30 giugno 2021) was adopted in 2021 on reuseable gowns vs disposables.</p> <p>With this new decree, reusable gowns – both Medical Devices or Devices for Individual Protection – represent the first choice opposed to disposable single-use devices. This is a fundamental legislative step forward at Italian level. Thanks</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
		<p>to this new decree and the use of re-usable gowns, the negative environmental impacts will be limited especially when related to public procurement for the supply of textile products as well as textile waste. The decree establishes in point 3, section C) that the gowns classified as Medical Devices or Devices for Individual protection, made with reusable technical fabric must be used with priority as opposed to single use disposable. In point 3, section B) it is also confirmed that bed linen, table linen and similar products, must also be reusable and “non-disposable”.</p> <p>https://www.gazzettaufficiale.it/atto/serie_generale/caricaDettaglioAtto/originariato.dataPubblicazioneGazzetta=2021-07-14&atto.codiceRedazionale=21A04161&elenco30giorni=false</p>	
811	8; 2319 - 2392	<p>The current EU GPP criteria offer scope for the inclusion of organic textiles for apparel in the EU. However there are several barriers, consequently the opportunity is not fully exploited. The barriers and opportunities are outlined outlined below.</p> <p>1) Role of TED in promoting GPP for textile products</p> <p>Sustainable and organic textile goods suppliers are mostly SMEs. Thus, the viable and competitive sustainable textile procurement market depends on including SMEs needs into GPP strategy.</p> <p>Therefore, the mandatory threshold of EUR 139 000 for contract notices restricts the access to tender opportunities by smaller SMEs.</p> <p>It would encourage participation if the threshold for tenders included in the scope of GPP for textile product could be reduced. Alternatively, as a part of GPP strategy, public procurers could be expressly encouraged to publish on TED all their tenders for sustainable and organic textiles, even if they are below the current mandatory threshold. To ease the process of searching for suitable tender opportunities, TED searching tools and filtering options could enable direct access to tenders that fall within the scope of GPP.</p> <p>2) Monitoring challenges through the GOTS Global Trace Base</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>To effectively address sustainability challenges, GOTS is leveraging technology and big data to develop and put forward innovative and practical digital solutions in the textile industry. A case in point is Global Trace Base (GTB), an initiative that brings together accessible, quantifiable, and standardised information that will enable public procurers, industry professionals and the community at large to better monitor, evaluate and improve supply chain practices while increasing transparency and accountability.</p> <p>3) Application of GPP criteria</p> <p>From GOTS' point of view, the extent of use of the use GPP criteria in public tenders is unsatisfactory. The reason lies not in their voluntary nature, but in their sometimes inaccurate application. Practice shows that social and environmental considerations are mostly used as secondary award criteria. In this context, conventional goods suppliers and sustainable product providers are forced to compete in an unfair game. The lowest price and fastest delivery deadlines become, in fact, decisive factors for the award of the contract to the big market players.</p> <p>Consequently, social and environmental requirements shall form part of the contract description and mandatory technical specifications as an objective and non-discriminatory access condition to the tender. It must be stressed that the European sustainable and certified textiles goods market is big enough to guarantee a real competition between "green" providers in public tenders.</p> <p>When it comes to the organic textiles, there are more than 13.549 GOTS certified facilities, that with proper tender conditions could provide public sector with textile goods of the highest environmental and social standards.</p> <p>4) Challenges for the future mandatory EU GPP criteria</p>	

ID	Stated section; stated line	Comment	Answer
		<p>GOTS considers that the clear response to all the challenges for the future use of mandatory GPP criteria for textile products is the use of environmental, social, and other characteristics already set in voluntary textile standards and labels.</p> <p>In line with Article 42 of the EU public procurement directive, when contracting authorities plan to purchase organic textile goods with specific environmental, social or other characteristics they may, in the technical specifications, the award criteria or the contract performance conditions, require a specific label. GOTS provides proof that the products correspond with the required characteristics.</p> <p>GOTS sets “clear and fixed requirements” for organic textile products. This means that there is no need to develop requirements for organic textiles from scratch to implement the GPP strategy. As a document to be submitted by textile providers, GOTS “facilitates the verification of product characteristics to procurers, who are usually not sustainability experts”. The need related to “Establish a framework which considers environmental and social aspects in the whole value chain”, is also covered by GOTS, with the certification scheme that covers the supply chain from the field to the end product.</p> <p>By requiring products certified to GOTS in public tenders for organic textile goods, there is no room for the “the lack of legal certainty on the correct interpretation of the requirement for a ‘link’ to the subject matter of the contract” as all GOTS requirements refer exclusively to the organic textile goods.</p>	
812	8; 2356	When will the current GPP criteria be reviewed? Because the current GPP criteria contains NO circular aspects (as for example mentioned under article 5 (1). ESPR criteria should be the baseline for GPP and included in GPP legislation/criteria/directive.	<p>Clarified</p> <p>The development of mandatory green public procurement criteria will be based on the ecodesign criteria.</p>

ID	Stated section; stated line	Comment	Answer
813	8.2 Current voluntary EU Green Public Procurement criteria; 2356	<p>We strongly welcome the possibility to regulate and mandate Green Public Procurement (GPP) under the ESPR. We believe that Green Public Procurement (GPP) in the context of reducing apparel production and consumption impact on the environment presents a valuable opportunity for standardised product eco-design, limited lifetime predefinition, and easy collection of end-of-life garments, making it ideal for promoting recycling and circularity at the national level. For the product segment work wear (e.g. hospital, hotel, restaurant uniforms and similar), we believe GPP can be a powerful driver for accelerating recycling and circularity in the apparel sector. For instance, initiatives like the French project FRIVEP Consortium (http://www.oree.org/source/_guide_ecoconception_vetements_professionnels_FRIVEP.pdf; http://www.oree.org/frivep.html#frivep) can provide valuable insights and establish standards for eco-design practices. The project that did include a broad range of governmental actors and was anchored under the guidance of the ministries of environment as well as economy had demonstrated the high challenge for recycling that is caused by a lack of appropriate design requirements in this regard. In the meantime, it has led to a fundamentally new perspective on the necessity for “design-for-recyclability” rules in public specifications and associated initiatives to support the build and scaling of textile sorting and recycling plants within France.</p> <p>We therefore recommend the JRC to advance the development of mandatory GPP criteria under the ESPR Delegated Act for Apparel. Such criteria have the potential to significantly stimulate the use of recycled materials and incentivize the recycling industry across the EU.</p> <p>Workwear, often relevant for public tenders, tends to have a uniform character in terms of materials used. Therefore, implementing recycled content and recyclability criteria for workwear in public tenders holds great potential for streamlining collection and recycling processes efficiently.</p> <p>Furthermore, governments should serve as role models for EU eco-design legislation to enhance credibility and expedite the transition towards a more sustainable and circular industry. Projects like the mentioned French FRIVEP initiative serve as exemplary models in this regard.</p>	Acknowledged
814	8.2; 2370	Other aspects that would support the adoption of the criteria include: enhancing SMEs involvement, through financial incentives; promoting closer collaboration between suppliers and procurers towards bridging the gap between demand and supply; and promoting and accommodating flexibility, so that smaller companies with smaller production volumes can join efforts and participate collectively.	Acknowledged

ID	Stated section; stated line	Comment	Answer
815	8; 2371	The Netherlands (and Flanders) have a criteria tool for GPP: https://www.mvicriteria.nl/en	Acknowledged
816	8; 2371	Question webinar: Setting Criteria for Tenders for collection and sorting of textiles. We will send a report via e-mail '2371A' (in Dutch)	Acknowledged
817	8; 2371	Question webinar: Setting Criteria for Tenders for collection and sorting of textiles. "See report 2371B (in Dutch), we will send it via e-mail and highlighted the text below. Processing (sorting and valorizing) Sorting and marketing (processing) textiles is part of this assignment. To ensure high-quality sales of the textiles and to gain insight into this sales chain, fine sorting of the textiles is a requirement. With regard to the sorting of textiles, the minimum requirement is that 90% of the collected textiles (excluding contamination) can be traced back to 100 types within the Netherlands. The contracting authority wants to receive an overview of all the different categories of textiles that are sorted within the relevant textile sorting center. In addition, the contracting authority wants to gain insight into the sales channels of the sorted material. This means that the tenderer reports to the contracting authority in which application the different sorted textile flows are used in the remainder of the chain. This fine sorting must be demonstrably tailored to both product reuse and material reuse. By product reuse, the contracting authority refers to the reusable part of the textiles that are sold in thrift stores at home or abroad. Material reuse refers to the non-reusable part of the textile; the so-called subspecies. Non-reusable textiles must be sorted in such a way that they can be used for maximum recycling. It is not permitted for the collected textiles to be exported abroad in a cleaned, coarsely sorted or unsorted manner. The contracting authority expects the tenderer to guarantee the continuity of the sorting of the offered textiles as of	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>January 1, 2023 and to carry out the sorting in accordance with the (implementation) conditions in this tender guideline including appendices, including the model agreement, and the applicable laws and regulations. as well as the policy and minimum standard as formulated in the current National Waste Management Plan (LAP) or other guidelines to be issued by national and/or European authorities.</p> <p>The contracting authority expects the tenderer to process textiles that is characterized by:</p> <ul style="list-style-type: none"> • compliance with legal rules and regulations regarding textile processing; • conformity with regard to quality and sustainability as indicated in minimum requirements and award criteria. • high operational reliability, continuity of service and purchase guarantee; • a high degree of reuse and recycling of the textiles offered; • minimal emissions to the environmental compartments of air, soil and groundwater and surface water." 	
818	8.2; 2377	<p>MEASURING PRODUCT LIFE CYCLE COSTING (LCC)</p> <p>LCC allows organizations to better understand the value of a range of items with different durability in meeting a clear end-user requirement. It is also a way to validate the phrase “buy cheap, buy twice”, which in the long run, when all costs are taken into account, is more expensive. The challenge with LCC is to predict the lifetime of a garment.</p> <p>We commissioned Intertek, an international assurance, inspection, product testing and certification company to develop a methodology for life cycle costing (LCC) for combat uniforms. The objective of this new methodology is to allow buyers in a tender to know which offer is the most economically and ecologically advantageous. We would be happy to share the results of this study and the method with the JRC, if of interest.</p>	<p>Acknowledged</p> <p>The authors invite the stakeholder to share the study when it will be available.</p>
819	8.2; 2382-2383	<p>Additional challenges hindering the adoption of the current voluntary criteria include: lack of social aspects indicators, comparability of PEFCR data on different materials due to lack of end-of-life calculation, lack of key durability data on different materials.</p>	<p>Acknowledged</p>

12 Comments on section 9 – Annexes

12.1 Comments on section 9.1 – PRODCOM and market analysis

Table 15. Comments on section 9.1 – PRODCOM and market analysis

ID	Stated section; stated line	Comment	Answer
820	9; 3102	Annexes PRODCOM: Just want to highlight that CN-codes are used on national level for custom declarations and statistics of imported and exported goods. But this is not visible in Figure 17. Not sure if PRODCOM captures these statistics?	<p>Clarified</p> <p>There is full comparability between data from PRODCOM and data from foreign trade classified by the Combined Nomenclature. More information are available in the PRODCOM user manual: https://op.europa.eu/en/publication-detail/-/publication/3ce370e2-ada9-11ed-8912-01aa75ed71a1/language-en</p>
821	9.1.4; 3204	For products included in scope of the Preparatory Study, PRODCOM and CN codes should be provided in Table 40 (section 9.1.4) - correlation of codes is needed to facilitate market surveillance, customs process, and overall alignment.	<p>Clarified</p> <p>There is full comparability between data from PRODCOM and data from foreign trade classified by the Combined Nomenclature. More information are available in the PRODCOM user manual: https://op.europa.eu/en/publication-detail/-/publication/3ce370e2-ada9-11ed-8912-01aa75ed71a1/language-en</p>

12.2 Comments on section 9.2 – Life-cycle stages of apparel textiles

Table 16. Comments on section 9.2 – Life-cycle stages of apparel textiles

ID	Stated section; stated line	Comment	Answer
82 2	9.2.1 page 144 Figure 33; 3309	This scheme requires correction based on the feedback provided in the text section. The term "viscose solution" could be misleading as it describes the solution used in the production of viscose fiber. It is possible that you meant "viscous solution," spelled differently, to accurately depict the solution's viscosity. Clarifying this distinction would enhance the scheme's accuracy.	Acknowledged and clarified. Figure was changed, with cellulose based materials.
82 3	9.2.1 page 145; 3324- 3327	<p>Man-made cellulosic fibers are derived from natural polymers such as cellulose, often originating from materials like dissolving wood pulp. Dissolving pulp, derived from various wood types or other cellulosic materials (e.g. cellulose-based textiles), undergoes dissolution with the use of chemicals. The resulting solution is then spun into either regenerated cellulose fibers (such as viscose, modal, lyocell) or chemically modified fibers (such as acetate), which are suitable for conventional textile processes. The primary raw material in this process is the cellulose-based feedstock, primarily sourced from wood, while the key processing materials are the chemicals utilized in the dissolution process. It is noteworthy to consider that certain processes, such as lyocell, often feature a remarkably high rate of solvent recovery, often exceeding 99%.</p> <p>Reference: https://www.lenzing.com/?type=88245&tx_filedownloads_file%5bfileName%5d=fileadmin/content/PDF/04_Nachhaltigkeit/Broschueren/EN/focus-paper-responsible-production-EN.pdf</p>	Acknowledged
82 4	9.2.1; 3352	<p>I propose to change the phrase to refer to the origin of resins regardless of its shape.</p> <p>East Asian chemical fiber companies, the major synthetic fiber producers globally, and it is common that they start by synthesizing their own resins.</p> <p>In addition, the raw materials are not only resins derived from fossil fuels, but those from biomass and also recycled materials. Although their share is tiny by the volume but expected to increase in the future with the need of decarbonization and Fiber2Fibre recycling. In addition, I believe that the number of chemical fiber companies that will diversify their raw materials and engage in the pre-spinning process in-house, so the expression "skip the preparation stage" is inappropriate.</p>	Clarifications needed from the stakeholder The authors do not understand the comment. It is not clear the role of resins in this

ID	Stated section; stated line	Comment	Answer
			<p>step. Furthermore, the preparation refers to the processes prior to the yarn manufacturing suitable only for naturally based fibres counting with impurities, etc. The authors invite the stakeholder to provide more clarifications in the next consultation.</p>
82 5	9.2.2 page 146 Figure 34; 3357	<p>Your scheme appears to conflate the fiber spinning and yarn spinning processes, potentially leading to confusion. It is important to note that man-made fibers, not only natural fibers, can indeed be spun using conventional yarn spinning technologies such as ring, open-end, and air-jet spinning. However, it seems the air-jet yarn spinning technology is overlooked in your scheme.</p> <p>Moreover, it is essential to recognize that there are various fiber spinning processes tailored to different types of man-made fibers:</p> <ol style="list-style-type: none"> 1. Melt spinning (e.g. polyester, polyamide, polypropylene, polyethylene, metal fibers, glass fibers) 2. Solution spinning 	<p>Partially accepted</p> <p>Most of the indicated spinning techniques were added in the figure, with the exception of gel spinning and</p>

ID	Stated section; stated line	Comment	Answer
		<p>2.1 Dry spinning (e.g. acetate, triacetate, polyacrylonitrile)</p> <p>2.2 Wet spinning (e.g. viscose, modal, acetate, polyacrylonitrile, aramid)</p> <p>A sub-category of wet spinning is 2.3 Dry-jet wet spinning (e.g. lyocell, aramid, polyacrylonitrile)</p> <p>2.4 Gel spinning (UHMW PE)</p> <p>2.5 Electrospinning (nanofibers from natural and synthetic polymers)</p>	electrospinning, as they would be niche and specialized apparel textile products, therefore a very small market share.
82 6	9.2.2 page 146; 3360- 3361	<p>This sentence should be refined for accuracy.</p> <p>Both natural staple fibers and man-made staple fibers can typically be spun into yarns using the same yarn spinning technologies as natural fibers.</p> <p>However, an exception lies with filaments, which are long, continuous fibers. Filaments are gathered (twisted) into yarns immediately after the fiber spinning process instead of being cut into staple fibers with specific lengths compatible with conventional yarn spinning machines used for staple fibers.</p> <p>For regenerated cellulose fibers, in particular, the production of filaments and staple fibers shows minimal differences in fiber spinning level, with the primary distinction being the cutting of the endlessly long fiber (filament) to create staple fibers.</p>	<p>Partially accepted</p> <p>Information on regenerated cellulose fibres does not belong to this life cycle stage, and it can be considered in the detailing of recycling processes.</p>
82 7	9.2.2 page 146; 3370- 3371	Fiber spinning involves extruding a liquid mass (melt or solution) into fiber filaments, which can then be twisted into yarns or cut into staple fibers.	Acknowledged
82 8	9.2.2 page 146; 3372- 3376	<p>1. Melt spinning (e.g. polyester, polyamide, polypropylene, polyethylene, metal fibers, glass fibers)</p> <p>2. Solution spinning</p>	<p>Partially accepted</p> <p>Most of the indicated</p>

ID	Stated section; stated line	Comment	Answer
		<p>2.1 Dry spinning (e.g. acetate, triacetate, polyacrylonitrile)</p> <p>2.2 Wet spinning (e.g. viscose, modal, acetate, polyacrylonitrile, aramid)</p> <p>A sub-category of wet spinning is 2.3 Dry-jet wet spinning (e.g. lyocell, aramid, polyacrylonitrile)</p> <p>2.4 Gel spinning (UHMW PE)</p> <p>2.5 Electrospinning (nanofibers from natural and synthetic polymers)</p> <p>Line 3376: Actually, viscose is produced using the wet spinning process!</p>	<p>spinning techniques were added in the figure, with the exception of gel spinning and electrospinning, as they would be niche and specialized apparel textile products, therefore a very small market share.</p>
829	9.2.2; 3374	Wrong description of spinning methods. Wet spinning = viscose, dry spinning = lyocell.	<p>Accepted The text was modified</p>
830	9.2.7; 3501	It should be added that hazardous substances such as PFAS, biocides and dyes are released during the use phase through washing and wear and tear.	<p>Rejected The authors invite the stakeholder to provide references to the arguments provided.</p>
831	9.2.7; 3509	Use - the lifespan: is also affected by the fit of the garment, the size chosen, whether the garment is in intended use (and not for example a festive and delicate piece of clothing in everyday active use or sports).	<p>Clarified The text was updated. The authors here</p>

ID	Stated section; stated line	Comment	Answer
			refer to the physical durability of the product.
83 2	9.2.8; General comment	It was commented during the meeting, that the actual recycling capacities, the actual amount of recycled fibre available and the commercial viability of the products with recycled content must be considered in order to define recycled content targets. First of all, it must be said, that if products with recycled content are not commercially viable, recycling is not commercially viable and would thus not happen. Further than this, it must be noted, that recycled content targets allow to create a strong and stable demand for recyclates, which on its turn allows to invest and innovate, scaling up textile recycling technologies. In addition, it must be considered that the ongoing revision of the Waste Framework Directive, with the potential introduction of a mandatory EPR system across the EU, will provide further incentivise investments in waste management capacities. This means that recycled content targets are essential for the recycling industry and that future potential and not only current situation must be considered when setting targets. Targets should in any case be phased in time to accompany the progress.	Acknowledged The following tasks of the PS will address this topic more in detail. This section provides just a general understanding of the waste management.
83 3	9.2.8; General comment	Concerns have been expressed over the use of PET as recycled content in textiles, asking for it to be banned. Such a ban would be an unjustified market restriction. There are already mechanisms in place under the Packaging legislation to ensure recycled content, mainly for PET. In addition, Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods also defined strict criteria for the collected plastic waste, among others, that it originated from separately collected waste. This means that with these measures, most of the PET waste packaging should be directed back to rPET packaging. However, there will still be some waste PET that could be used for textile production, meaning that it will still be recycled even if not possible for food contact material (e.g. because it does not meet the quality criteria as it was not separately collected, or it is littered PET taken out of oceans). Such recycling shall not be banned. The market supply of recycled PET currently vastly outstrips the demand for the recyclate which means there is no reason to restrict the use of recycled PET in textiles.	Acknowledged The requirements will be developed in future steps of the PS.
83 4	9.2.8; 3511	New report: Consumers' driving forces, obstacles and habits linked to second-hand purchases:	Clarifications from the stakeholder needed The authors do not understand

ID	Stated section; stated line	Comment	Answer
			the comment. The stakeholder will be able to submit clarifications in the next consultation.
83 5	9.2.8; 3535- 3536	The current Waste Framework Directive (WFD) lacks definitions regarding remanufacturing. However the ESPR states that 'remanufacturing' means actions through which a new product is produced from objects that are waste, products or components and through which at least one change is made that substantially affects the safety, performance, purpose or type of the product. This means that stakeholders performing such actions share the same obligations as any other manufacturer placing new products on the market. Considering the ESPR definition saying that remanufacturing actions result in new products one could question whether the "new products" could be defined as "recycled products".	Clarified The components of the remanufactured product come from the status of waste. Since the change of these components substantially affects the type of product, the JRC thinks that it is suitable to place remanufacturing in this section.
83 6	Annex; 3537/3538	To diversify the solution to the issue of textile waste, the setting-up of EPR schemes across the EU must be aligned with the waste hierarchy, and be as harmonised as possible, specifically regarding eco-modulation of EPR fees (which should be based on the ESPR delegated act).	Acknowledged

12.3 Comments on section 9.3 – Supporting information about tests and standards in the textile industry

Table 17. Comments on section 9.3 – Supporting information about tests and standards in the textile industry

ID	Stated section; stated line	Comment	Answer
837	Section 9.3; Table 47	<p>The active working group in CEN TC 248 are the following:</p> <p>CEN/TC 248/WG 10, Size system of clothing</p> <p>CEN/TC 248/WG 14, UV protective properties</p> <p>CEN/TC 248/WG 17, Hygienic quality of textiles processed in industrial laundries and used in sectors in which it is necessary to control biocontamination</p> <p>CEN/TC 248/WG 20, Safety of children's clothing</p> <p>CEN/TC 248/WG 24, Test methods for the flammability of textiles</p> <p>CEN/TC 248/WG 25, Cosmeto-textiles</p> <p>CEN/TC 248/WG 26, Textiles -Test methods for analysis of EC restricted substances</p> <p>CEN/TC 248/WG 28, Thermoregulatory properties of textiles and textile products</p> <p>CEN/TC 248/WG 30, Composition - Qualitative and quantitative analysis of fibres and fibre mixtures</p> <p>CEN/TC 248/WG 31, Smart textiles and electronic textiles</p> <p>CEN/TC 248/WG 34, Joint Working Group between CEN/TC 248 and CEN/TC 252 - Risks in the sleeping environment</p>	<p>Partially accepted</p> <p>The working groups have been adapted according to the comment when needed. Additionally, the ISO/TC 38 have been included in a dedicated table in Section 9.3.</p> <p>The ISO and CEN TC working on materials of animal origin are not focused on textile materials, thus they do not apply in this PS. The ISO TC 133 - Clothing sizing systems are not part of the scope of this PS.</p>

ID	Stated section; stated line	Comment	Answer
		<p>CEN/TC 248/WG 35, Slide (zip) fasteners</p> <p>CEN/TC 248/WG 37, Microplastics from textile sources</p> <p>CEN/TC 248/WG 38, Community face coverings - Guide to minimum requirements, methods of testing and use</p> <p>CEN/TC 248/WG 39, Circular Economy for textile products and the textile chain</p> <p>CEN/TC 248/WG 4, Coated fabrics</p> <p>CEN/TC 248/WG 9, Prioritization of research topics</p> <p>The active working group in ISO TC 38 are the following:</p> <p>ISO ISO/TC 38/SC 1, Tests for coloured textiles and colorants</p> <p>ISO/TC 38/SC 2, Cleansing, finishing and water resistance tests</p> <p>ISO/TC 38/SC 20, Fabric descriptions</p> <p>ISO/TC 38/SC 23, Fibres and yarns</p> <p>ISO/TC 38/SC 24, Conditioning atmospheres and physical tests for textile fabrics</p> <p>ISO/TC 38/CAG, Chair's Advisory Group</p> <p>ISO/TC 38/WG 9, Nonwovens</p> <p>ISO/TC 38/WG 17, Physiological properties of textiles</p> <p>ISO/TC 38/WG 21, Ropes, cordage, slings and netting</p>	

ID	Stated section; stated line	Comment	Answer
		<p>ISO/TC 38/WG 22, Composition and chemical testing</p> <p>ISO/TC 38/WG 23, Biological properties of textiles</p> <p>ISO/TC 38/WG 27, Fabric properties relating to moisture</p> <p>ISO/TC 38/WG 29, Testing methods for textile products against noxious pests</p> <p>ISO/TC 38/WG 30, Tests for Biodegradability</p> <p>ISO/TC 38/WG 31, Non-fibrous bio-based material for textiles</p> <p>ISO/TC 38/WG 32, Smart textiles</p> <p>ISO/TC 38/WG 33, Animal welfare in the textile supply chain</p> <p>ISO/TC 38/WG 34, Microplastics from textile sources</p> <p>ISO/TC 38/WG 35, Environmental aspects</p> <p>ISO/TC 38/WG 36, Activated carbon fibre</p> <p>Relevant for the scope of the PS would also be to include the work of ISO TC 133 - Clothing sizing systems.</p> <p>Finally, if the JRC agrees to include materials of animal origin, the relevant CEN and ISO TC working on those materials should be added.</p>	
838	Section 9.3; Table 47	The active working group in CEN TC 248 are the following:	<p>Partially accepted</p> <p>The working groups have been adapted according to the comment when needed.</p>

ID	Stated section; stated line	Comment	Answer
		<p>CEN/TC 248/WG 10, Size system of clothing</p> <p>CEN/TC 248/WG 14, UV protective properties</p> <p>CEN/TC 248/WG 17, Hygienic quality of textiles processed in industrial laundries and used in sectors in which it is necessary to control biocontamination</p> <p>CEN/TC 248/WG 20, Safety of children's clothing</p> <p>CEN/TC 248/WG 24, Test methods for the flammability of textiles</p> <p>CEN/TC 248/WG 25, Cosmets-textiles</p> <p>CEN/TC 248/WG 26, Textiles -Test methods for analysis of EC restricted substances</p> <p>CEN/TC 248/WG 28, Thermoregulatory properties of textiles and textile products</p> <p>CEN/TC 248/WG 30, Composition - Qualitative and quantitative analysis of fibres and fibre mixtures</p>	<p>Additionally, the ISO/TC 38 have been included in a dedicated table in Section 9.3.</p> <p>The ISO and CEN TC working on materials of animal origin are not focused on textile materials, thus they do not apply in this PS. The ISO TC 133 - Clothing sizing systems are not part of the scope of this PS.</p>

ID	Stated section; stated line	Comment	Answer
		<p>CEN/TC 248/WG 31, Smart textiles and electronic textiles</p> <p>CEN/TC 248/WG 34, Joint Working Group between CEN/TC 248 and CEN/TC 252 - Risks in the sleeping environment</p> <p>CEN/TC 248/WG 35, Slide (zip) fasteners</p> <p>CEN/TC 248/WG 37, Microplastics from textile sources</p> <p>CEN/TC 248/WG 38, Community face coverings - Guide to minimum requirements, methods of testing and use</p> <p>CEN/TC 248/WG 39, Circular Economy for textile products and the textile chain</p> <p>CEN/TC 248/WG 4, Coated fabrics</p> <p>CEN/TC 248/WG 9, Prioritization of research topics</p>	

ID	Stated section; stated line	Comment	Answer
		<p>The active working group in ISO TC 38 are the following:</p> <p>ISO ISO/TC 38/SC 1, Tests for coloured textiles and colorants</p> <p>ISO/TC 38/SC 2, Cleansing, finishing and water resistance tests</p> <p>ISO/TC 38/SC 20, Fabric descriptions</p> <p>ISO/TC 38/SC 23, Fibres and yarns</p> <p>ISO/TC 38/SC 24, Conditioning atmospheres and physical tests for textile fabrics</p> <p>ISO/TC 38/CAG, Chair's Advisory Group</p> <p>ISO/TC 38/WG 9, Nonwovens</p>	

ID	Stated section; stated line	Comment	Answer
		<p>ISO/TC 38/WG 17, Physiological properties of textiles</p> <p>ISO/TC 38/WG 21, Ropes, cordage, slings and netting</p> <p>ISO/TC 38/WG 22, Composition and chemical testing</p> <p>ISO/TC 38/WG 23, Biological properties of textiles</p> <p>ISO/TC 38/WG 27, Fabric properties relating to moisture</p> <p>ISO/TC 38/WG 29, Testing methods for textile products against noxious pests</p> <p>ISO/TC 38/WG 30, Tests for Biodegradability</p> <p>ISO/TC 38/WG 31, Non-fibrous bio-based material for textiles</p> <p>ISO/TC 38/WG 32, Smart textiles</p>	

ID	Stated section; stated line	Comment	Answer
		<p>ISO/TC 38/WG 33, Animal welfare in the textile supply chain</p> <p>ISO/TC 38/WG 34, Microplastics from textile sources</p> <p>ISO/TC 38/WG 35, Environmental aspects</p> <p>ISO/TC 38/WG 36, Activated carbon fibre</p> <p>Relevant for the scope of the PS would also be to include the work of ISO TC 133 - Clothing sizing systems.</p> <p>Finally, if the JRC agrees to include materials of animal origin, the relevant CEN and ISO TC working on those materials should be added.</p>	
839	9.3; 3544	In table 48, we would suggest to add is ASTM D2582-16: Standard Test Method for Puncture-Propagation Tear Resistance of Plastic Film and Thin Sheeting	<p>Accepted</p> <p>Th Table 48 was updated.</p> <p>In the textile industry, this standard might be applied to certain synthetic fabrics or coatings that require similar tear-resistance properties. However, the correct and most up-to-date standard is ASTM D2582-21.</p>
840	9.3; 3544	- Comments on table 48/49: When considering physical testing parameters under the ESPR we believe in a limited core list of tests that can be applied holistically to a wide range of products, while at the same time raising the bar of the lifespan of products currently on the market. These should focus on the main failure modes of garments which are: pilling, colour fading, fabric breakdown and loss of dimensional stability. Therefore, the most suitable tests for testing physical	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
		<p>durability are: Appearance after wash (ISO 15487), Dimensional Stability Shrinkage (ISO 6330, ISO 3175, ISO 5077), Pilling (ISO 12945-1), Fabric Tensile Strength (ISO 13934-1 or ISO 13934-2) and Fabric Bursting (ISO 13938-2).</p> <p>- Extra consideration should be given to test standard 'Appearance after wash' (ISO 15487). This is due to the fact that apparel washable in a washing machine (according to care instruction) will be laundered at home by the customer. Therefore, when setting durability standards it is critical to ensure that garments can withstand laundering. It is critical that the product keeps its appearance, colour and function over time since it affects a product's end of life, and the appearance after wash test could indicate these parameters. In addition, this test should be considered as it generally can applied to all product categories.</p> <p>- Table 48 and 49 include certain test parameters that we see as basic quality requirements and not directly connected to increasing the lifespan of the product (i.e. not something that will get worse over time). Examples of such tests: Colour Fastness to Rubbing, Colour Fastness to Perspiration. This must be considered when setting requirements on durability.</p> <p>- Please note that the PEFCR test references are not updated according to latest PEFCR 2.0 where some tests now have been excluded.</p> <p>- All the recommended tests for assessing physical durability under the Delegated Act for Apparel should be fully harmonised with ISO international test standards.</p>	
841	9.3; 3544	Both ISO 4484-2 and ISO 4484-2 were published as standards in 2023.	Accepted The text was updated.
842	Section 9.3; Table 49	ISO 6330 is mentioned by itself in some rows of the PEFCR column. However, this should not be the case, because ISO 6330 describes the pretreatment procedure, not the test on the garment itself. It is possible the PEF column needs to be updated with the latest PEFCR version.	Accepted The text was updated.
843	Section 9.3; Table 49	ISO 6330 is mentioned by itself in some rows of the PEFCR column. However, this should not be the case, because ISO 6330 describes the pretreatment procedure, not the test on the garment itself. It is possible the PEF column needs to be updated with the latest PEFCR version.	Accepted The text was updated.

ID	Stated section; stated line	Comment	Answer
844	9.3; 3560	<p>- Comments on Table 50: includes a lot of tests that are not connected to product durability, for example burning behavior which is a product safety related standard.</p> <p>- From functional test perspective we recommend focusing on parameters that are key value drivers for the customer when buying a product and important for the product's intended use (where the customer can notice if the function does not last over time). Functional tests shall only be required if it is claimed on the product. Examples are:</p> <ul style="list-style-type: none"> • Water penetration (ISO 811) - "water proof" • Water repellency (ISO 4920) • Insulation (ISO 11092) 	<p>Rejected Table 50 does not include tests connected to product durability, but tests related to the functionality of the textiles. Burning behaviour is related to the functionality of textiles as well.</p>
845	9.3; 3560	ISO11737-3 was published as standards in 2023.	<p>Accepted The text was updated.</p>
846	9.3 Supporting information about tests and standards in the textile industry; 3565	another relevant standard is: ISO 20706-1 Textiles — Qualitative and quantitative analysis of some bast fibres (flax, hemp, ramie) and their blends — Part 1: Fibre identification using microscopy methods	<p>Accepted The text was updated.</p>
847	9.3; 3565	•❖Comments on table 51: Please note that the standard for Chlorinated benzenes and toluenes is a withdrawn standard.	<p>Accepted The text was updated.</p>
848	9.3; 3569	<p>General: Please check [...] https://afirm-group.com/afirm-rsl/</p> <p>Specific comments on table 52:</p> <ul style="list-style-type: none"> • DIN 54231: is a test method for detection of disperse dyestuff and should be moved to the right category instead of being in Aromatic amines derived from azo colorants. • Chlorinated benzenes and toluenes DIN 54232:2010: this test has been withdrawn. In the context of the work in AFIRM, the industry uses EN 17137:2018 • Determination of extractable metals: instead of DIN 54233, AFIRM RSL refers to 	<p>Acknowledged the general comment</p> <p>Accepted Specific comments</p>

ID	Stated section; stated line	Comment	Answer
		<p>DIN EN 16711-2:2016</p> <ul style="list-style-type: none"> • Determination for chlorophenols: AFIRM RSL refers to EN 17134-2:2023 for all materials, without making an exception for leather • Determination of dyestuff: AFIRM RSL mainly refers DIN 54231:2022 for dyes forbidden and disperse. Determination of index ingredients: there we have a gap, but the standard ISO 22195 has been updated in 2023, so what they refer to (2020) has been withdrawn 	
849	9; 3569	<p>Table 52</p> <p>EN ISO 1056. The ISO website mention the withdrawal of ISO 1056. Could you please confirm the ID code for the “determination of extractable metals” for “Textiles – test for colour fastness”?</p>	<p>Accepted</p> <p>Replaced with UNE-EN 16711-2:2016</p>
850	9; 3569	<p>Table 52</p> <p>ISO 1833 for “Quantitative chemical analysis”. This reference should be removed from the table 52 because although this method is a chemical test it relates to fibre identification by chemical separation but it is not an standard for the determination of specific substances</p>	<p>Accepted</p> <p>The text was updated</p>
851	9.3; 3569	ISO 22195-3 was published as standards in 2023.	<p>Accepted</p> <p>The text was updated</p>
852	9.3; 3569	ISO 14184-3 was published as standards in 2023.	<p>Accepted</p> <p>The text was updated</p>
853	9.3; 3574	It is important to take into account that a loss of fragmented fibres can also occur in relation to natural fibres, not only with microplastics.	Acknowledged
854	9.3; 3574	Loss of fragmented fibres can also occur in relation to natural fibres, which can contain harmful substances and cause harm, not only with microplastics	Acknowledged
855	9.3; 3574	<p>Comments table 53:</p> <p>- Loss of fragmented fibres can also occur in relation to natural fibres, which can contain harmful substances and cause harm, not only with microplastics. Natural fibres are very often enhanced with persistent chemical additives, and therefore there is need for sound scientific assessment on the toxicity of these additives, and on how they hinder the natural fibre degradation. Any potential requirements must</p>	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>therefore address fiber fragmentation from both synthetic and natural fibres. We also recommend referring to the research conducted by the Microfibre Consortium (TMC) – a science-based global industry alliance which has committed to clarifying and eliminating the problem of fibre shedding by 2030.</p> <p>- TMC has developed their own test method testing microfiber shedding. This test methods is slightly different from ISO 4484, but TMC is aiming to have their method aligned with ISO methods.</p> <p>- The TMC method should be considered because TMC is setting up a database for different fabrics/finishes/dyeing and spinning techniques. For making good policy, it is critical to base this on the latest scientific knowledge.</p>	
856	Section 9.3; Table 54	<p>ISO 5157:2023 on Textiles — Environmental aspects — Vocabulary has been published</p> <p>The three CEN working items on circularity mentioned in the table (General principles and guidance, Categorisation of and requirements on non-virgin input materials and Design for circularity) are currently discussed as Technical Specifications, not standards, and are all within the scope of work of CEN TC 248/WG 39.</p>	<p>Accepted Changes included in table 54.</p>
857	Section 9.3; Table 54	<p>ISO 5157:2023 on Textiles — Environmental aspects — Vocabulary has been published</p> <p>The three CEN working items on circularity mentioned in the table (General principles and Guidance, Categorisation of and requirements on non-virgin input materials and Design for circularity) are currently discussed as Technical Specifications, not standards, and are all within the scope of work of CEN TC 248/WG 39.</p>	<p>Accepted Changes included in table 54.</p>
858	9.3; 3579	<p>Comments 54:</p> <p>- Most of these standards are under development, but when they are finalised they will likely bring a lot of value especially related to definitions and vocabulary</p>	<p>Acknowledged</p>

ID	Stated section; stated line	Comment	Answer
		- For the purpose of verification and compliance with eco-design measures, please only rely on finalised standards.	
859	9.3; 3579	ISO 5157 was published as standards in 2023.	Accepted Text was updated
860	Section 9.3; Table 55	Standards for odour testing (like SNR 195651:2015) is relevant and should be included. It is common in both certification, e.g. Oeko-Tex and in companies own RSLs. Odour management is included in table 49, but the standard referred therein is for antibacterial activity and not odour in general.	Partially accepted The SNR 195651:2015 is published by the Swiss Association for Standardization, the related ISO standard (17299:2014) addressing similar aspects is already included in the PS.
861	Section 9.3; Table 55	Standards for odour testing (like SNR 195651:2015) is relevant and should be included. It is common in both certification, e.g. Oeko-Tex and in companies own RSLs. Odour management is included in table 49, but the standard referred therein is for antibacterial activity and not odour in general.	Partially accepted The SNR 195651:2015 is published by the Swiss Association for Standardization, the related ISO standard (17299:2014) addressing similar aspects is already included in the PS.

12.4 Comments on section 9.4 – Supporting information about environmental labels

Table 18. Comments on section 9.4 – Supporting information about environmental labels

ID	Stated section; stated line	Comment	Answer
862	9.4.2; 3630	Nordic Ecolabel or "Swan": (the full name of the label is "Nordic Swan Ecolabel") Please note that topics addressed in the criteria include ethical/social requirements and durability.	Acknowledged The Table 56 reports the criteria grouping performed by Ranasinghe and Jayasooriya (2021). Table 87 reports a detailed analysis of all criteria.

ID	Stated section; stated line	Comment	Answer
863	9.4.2 and 9.7.2; 3630 Table 56 and 4549 Table 82, 4555 Table 84, 4561 Table 86	<p>Section 9.4.2:</p> <p>Table 56: The listing under Global Organic Textile Standard is incorrect - it is a Category 1 Green Label certification ISO Type 14024 Type 1 Ecolabel. In Table 56 it is incorrectly listed as Type III and reference is made to the list of Global Ecolabels (https://www.ecogloballabel.org/download/GLOBAL_ECO_LABELS_LISTESI.pdf). However, GOTS does not appear on that list. GOTS should be included on that list.</p> <p>Section 9.7.2:</p> <p>The suggestions received by respondents, provided in Tables in section 9.7.2 highlight the many areas where organic natural fibre production and processing, according to GOTS meet the requirements for an Ecolabel. With more than 13,500 entities around the world certified to GOTS, including many thousands of products, GOTS has global relevance and should be specifically included alongside the EU Ecolabel, and in addition to the Nordic Swan and Blue Angel. It is not clear why GOTS, as an independent and comprehensive standard was not included.</p> <p>GOTS is a Category 1 Green Label certification ISO Type 14024 Type 1 Ecolabel. However, GOTS does not appear on the list of Global Ecolabels (https://www.ecogloballabel.org/download/GLOBAL_ECO_LABELS_LISTESI.pdf)</p> <p>Some specific issues arising from Tables 82, 84, 86. These demonstrate GOTS's relevance as an Ecolabel.</p>	<p>Clarifications needed from the stakeholder</p> <p>The reference was removed because the scheme was not listed in the reference. The authors invite the stakeholder to provide reference to the type of environmental label suggested for GOTS.</p> <p>The PS reports GOTS as certification scheme used by the Nordic Swan and Blue Angel.</p>

ID	Stated section; stated line	Comment	Answer
		<p>Table 82:</p> <p>GOTS supports the inclusion of organic cotton (and other organic fibres (flax and other bast fibres), and wool and other keratin fibres - pursuant to Criteria 1, 2, 3), and the inclusion of minimum percentages of organic cotton. Organic farm standards prohibit synthetic pesticides, fertilisers and Genetically Modified seeds, crop rotation is used, and the use of biological husbandry control are included. Organic farm production thus represents a comprehensive approach to the production of cotton and all other natural fibres in a less environmentally hazardous way.</p> <p>Table 84:</p> <p>General points: GOTS covers the entire supply chain, reports chemicals that should be analysed and improves comprehension (understanding) of the criteria</p> <p>Criterion 13: GOTS undertakes random sampling for quality control and the presence of chemical residues in finished products. Complies and exceeds ZDHC, has clear hazard based criteria and excludes the use of flame retardants, biocides and optical brighteners.</p> <p>Criterion 16: GOTS requires water treatment plants in textile processing factories</p> <p>Table 86:</p> <p>Criterion 26: GOTS Social Standards include reference to 12 key ILO norms and thus well reflects the need to ensure the fundamental principles and rights at work.</p> <p>Criterion 27: GOTS prohibits sandblasting and potassium permanganate</p> <p>Criterion 28: GOTS provides relevant information on the label regarding the compliance with the standards for both environmental and social criteria. The chain of custody model is clear, with the relevant information for traceability and transparency provided, particularly through the GOTS Public Database (https://global-standard.org/find-suppliers-shops-and-inputs/certified-suppliers/database/search)</p>	

ID	Stated section; stated line	Comment	Answer

12.5 Comments on section 9.5 – Supporting information on market analysis

Table 19. Comments on section 9.5 – Supporting information on market analysis

ID	Stated section; stated line	Comment	Answer
864	9.5.1; 3642	We have difficulties comparing your mapping with the one we have done internally. E.g. we are not familiar with 2 recycling plants in DK at full scale. And there should also be more than one in Sweden (counting Renewcell)	Acknowledged
865	9.5.1; 3642	In Table 57. "Number of textile recycling plants classified per location" We believe that there are more than three mechanical recycling plants in Türkiye, the figures can be confirmed with the relevant ministries of Türkiye.	Acknowledged The authors invite the stakeholder to provide reference to their argument.
866	9.5.2; 3651	3. Are there BREF for Bangladesh, Türkiye, Pakistan and Vietnam? Can you provide references of the legislation affecting the textile industry in these countries? Are there any studies about them? Don't have knowledge of any BREF in these countries, but country specific legislation is described in the Unep report, Sustainability and Circularity in the Textile Value Chain.	Acknowledged
867	9.5.3 page 180 Table 63; 3673	The studies indicate significant variations among different regions, making it impractical to derive an average from this data. Furthermore, possession duration in years may not serve as a reliable indicator.	Acknowledged

ID	Stated section; stated line	Comment	Answer
868	9.5.3 page 181 Table 64; 3676	<p>This table outlines four distinct categories, which at times may not appear logical. Regrettably, one of the studies analyzed in this paper failed to distinguish between various man-made fibers, such as viscose and polyester, which possess inherently opposite properties. This results in a combination of completely absorbent fibers with those that do not absorb moisture at all. Additionally, the category of “Cotton & blends” (or “Wool and blends”) may seem unclear. It is crucial to consider the blending partner – whether it is a natural fiber, regenerated cellulose fiber, synthetic fiber, or another material.</p> <p>This table fails to accurately depict the dynamics of the global fiber market. By treating wool (representing ~1% of global fiber production) and silk (~0.08% of global fiber production) as distinct categories, it overlooks a significant component - man-made cellulosic fibers, which constitute ~6.3% of global fiber production. Therefore, to provide a more comprehensive overview, it would be advisable to include an additional category specifically for man-made cellulosic fibers.</p> <p>Source for global fiber market shares: Textile Exchange Materials Market Report, December 2023 (Textile Exchange based on data from CIRFS, FAO, ICAC, IVC, IWTO, Maia Research, and its own modelling)</p>	<p>Acknowledged This table is based on a specific study. The authors invite the stakeholder to provide data and references to contrast the current results available.</p>

12.6 Comments on section 9.6 – Supporting information on user behaviour

Table 20. Comments on section 9.6 – Supporting information on user behaviour

ID	Stated section; stated line	Comment	Answer
869	9.6; 36 79	We stress the importance of representative samples of consumer interviews - The population of the EU is slightly over 448 million people and the differences between MS, age groups, gender and income levels should be properly represented in the data about consumer behaviour. To create a meaningful policy that will also drive consumer behaviour, the eco-design requirements must be based on representative scientific data. We recommend that where there is not representative data, ad hoc studies should be promoted for collecting information on consumer behaviour	<p>ACKNOWLEDGED.</p> <p>The JRC recognizes that some of the sample sizes, while significant, do not fully represent the entire EU population, nor do they capture all the nuances between member states, age groups, genders, and income levels.</p> <p>Given these limitations, the JRC has made every effort to extract valuable insights from the existing studies. The sample sizes of the analysed studies, do provide a substantial amount of information and have been instrumental in</p>

ID	Stated section; stated line	Comment	Answer
			<p>identifying general trends and behaviors.</p> <p>Moreover, the JRC has used the studies publically available and requested stakeholders to provide additional references, if possible.</p> <p>The JRC is committed to ensuring that the information included in the Preparatory Study are based on the most accurate and representative data available, and we appreciate the support from stakeholders in providing references to studies to achieve this goal.</p>
870	9.6; 36 79	<p>8. Are you aware of user behaviour studies/surveys focused on specific apparel textile categories?</p> <p>Are second-hand shell jackets better than users think? A comparison of perceived, assessed and measured functionality throughout lifespans - ScienceDirect https://www.sciencedirect.com/science/article User behavior</p>	ACKNOWLEDGED.

ID	Stated section; stated line	Comment	Answer
		<p>towards second-hand and leasing of clothing to facilitate textile reuse: http://mistrafuturefashion.com/wp-content/uploads/2019/10/S.Sweet_-second-hand-and-leasing-clothing-textile-reuse.-mistra-Future-fashion-2019.13.pdf Fast or slow Fashion perspective * Consumers' driving forces, obstacles and habits linked to second-hand purchases https://ivl.diva-portal.org/smash/get/diva2:1847249/FULLTEXT01.pdf</p>	
871	9.6.1.1; 3683	The distinction between consumers who see apparel as purely functional or self-representational feels artificial, as the combination would seem optimal. Maybe this was not an option in study, but could still be further investigated.	<p>ACKNOWLEDGED AND CLARIFIED.</p> <p>The JRC understands this interpretation. However, the JRC reported the distinction as indicated in the cited study. If additional related references are available, further investigation can take place.</p>
872	9.6.1.5; 3867-3868	New report: Consumers' driving forces, obstacles and habits linked to second-hand purchases Consumers' driving forces, obstacles and habits linked to second-hand purchases	
873	9.6.1.5 Attitud	The report referenced here is authored by a company that sells second-hand clothes and used to claim their positive environmental impact. Instead of using such a source, it is recommended to refer to the limited knowledge available from scientific sources. Estimations of the displacement rate of clothing reuse (the quantity of new purchases that are avoided by recirculation of used garments) range from 28.5% to 92% (Farrant et al., 2010; Fisher et al., 2011; Nørup et al., 2019; Stevenson	<p>PARTIALLY ACCEPTED AND CLARIFIED.</p> <p>The text in lines 3884-3895 has been</p>

ID	Statement; stated line	Comment	Answer
	<p>es toward second-hand apparel purchase; 38-38-95</p>	<p>& Gmitrowicz, 2012). Such studies, carried out in several countries, acknowledge the importance of contextual factors, location, age, gender, income, and type of item in displacement estimations. Low displacement rates found in African countries, for instance, are attributed to lack of access of respondents to affordable new clothes (Nørup et al. 2019). On the other hand, low replacement rates found in the UK are partly explained by second-hand purchases driven by a “spur of the moment” (Stevenson & Gmitrowicz, 2012). It is often not taken into consideration that second-hand garments are used fewer times than new items (Laitala et al., 2024).</p> <p>In line 3885 the report stresses that “By all accounts, second-hand purchases, generally speaking, tend to have a reduction effect on the purchase of new apparel” while there is no scientific consensus about that. We hope that reuse helps to reduce production, but there is not enough empirical evidence to claim to what extent this is true.</p> <p>The degree of replacement thus does not necessarily affect the degree of utilisation. Said in a simpler way: We all want a more circular economy, where materials and products are utilised far better than today. But circulating the products more will not necessarily lead to this. It is the total number (volumes) that is important, and not how often each product is sold and bought or rented out. Therefore, policies aimed at reducing quantities are more effective than those that seek to increase the circulation of products.</p> <p>In general, we would like to see the JRC report highlighting areas where knowledge is most needed to design more impactful policy, acknowledging that the effect of the policies currently in development is unknown, and that it needs to be thoroughly monitored to avoid undesired rebounds.</p>	<p>modified. New sources were used to illustrate the split views in terms of trade-offs related to apparel second-hand market and replacement rates.</p> <p>Please, note the following sources were not found:</p> <ul style="list-style-type: none"> - Stevenson, A., & Gmitrowicz, E. (2012). Study into consumer second-hand shopping behaviour to identify the reuse displacement effect. - Fisher, K., James, K., & Maddox, P. (2011).

ID	Stated section; stated line	Comment	Answer
		<p>References</p> <p>Farrant, L., Olsen, S. I., & Wangel, A. (2010). Environmental benefits from reusing clothes. <i>International Journal of Life Cycle Assessment</i>, 15(7), 726–736. https://doi.org/10.1007/s11367-010-0197-y</p> <p>Fisher, K., James, K., & Maddox, P. (2011). Benefits of Reuse Case Study: Clothing.</p> <p>Laitala, K., Klepp, I. G., & Løvbak Berg, L. (2024). The impact of modes of acquisition on clothing lifetimes. In K. Niinimäki (Ed.), <i>Recycling and Lifetime Management in the Textile and Fashion Sector</i> (pp. 91–111). Boca Raton: CRC Press.</p> <p>Nørup, N., Pihl, K., Damgaard, A., & Scheutz, C. (2019). Replacement rates for second-hand clothing and household textiles – A survey study from Malawi, Mozambique and Angola. <i>Journal of Cleaner Production</i>, 235, 1026–1036. https://doi.org/10.1016/j.jclepro.2019.06.177</p> <p>Stevenson, A., & Gmitrowicz, E. (2012). Study into consumer second-hand shopping behaviour to identify the re-use displacement effect.</p> <p>https://zerowastescotland.org.uk/sites/default/files/Study into consumer second-hand shopping behaviour to identify the re-use displacement affect.pdf</p>	<p>Benefits of Reuse Case Study: Clothing.</p> <ul style="list-style-type: none"> - https://zerowastescotland.org.uk/sites/default/files/Study into consumer second-hand shopping behaviour to identify the re-use displacement affect.pdf

I D	St ate d sec tio n; sta ted lin e	Comment	Answer
8 7 4	9.6. 2.2 19 0 Fig ure 44; 40 14	<p>This survey was conducted online, and it is essential to carefully consider the results without drawing any false conclusions about fibers.</p> <p>Here are some points to note:</p> <ul style="list-style-type: none"> ● As [...] European producer of all three generations of regenerated cellulose fibers (viscose, modal, lyocell), we have undertaken our own surveys, which have revealed a significant lack of awareness among consumers regarding generic terms such as viscose, modal, and lyocell, and their classification as regenerated cellulose fibers. Our internal survey conducted in 2020, specifically in Germany, illustrates this point: only 33% of respondents were familiar with the term viscose, 22% with modal, and merely 16% with lyocell. Similar trends were observed in the UK, Japan, and the US, with even lower percentages. <p>Given the online nature of these surveys conducted by Laitala, there are doubts about the accuracy of the results obtained.</p> <ul style="list-style-type: none"> ● The study failed to consider that most garments containing regenerated cellulose fibers are actually fiber blends, primarily with cotton or polyester. This fact is supported by certification data from Lenzing AG. In 2020-2022, 74.4% of fabrics submitted were lyocell fiber blends, 94.8% of modal fabrics, and 65.9% of viscose fabrics were blends. This oversight could potentially compromise the validity of the study's findings. ● The categories "cotton & blends" and "wool & blends" are overly broad. It is crucial to acknowledge that significant differences 	<p>ACKNOWLEDGED AND CLARIFIED.</p> <p>Information from internal surveys cannot be referenced in the Preparatory Study, unless the JRC has access to the information, due to JRC's commitment to transparency.</p>

ID	Statement; stated line	Comment	Answer
		<p>exist depending on whether these natural fibers are blended with regenerated cellulose fibers, other natural fibers, or synthetic fibers. Grouping these diverse alternatives together may not yield accurate conclusions regarding specific fiber types and their associated washing frequencies.</p> <p>In our view, the points mentioned must be taken into account before drawing conclusions from the cited survey results.</p>	
875	9.6.2.2 page 190; 40-40-21	<p>Claiming that textiles made from certain types of fiber are more durable simply because they are washed less often can be misleading.</p> <p>The paper suggests that frequent laundering is inherently a drawback, as it accelerates wear and tear on apparel. However, this suggestion overlooks the necessity for more frequent washing of garments worn next to the skin, such as underwear, in comparison to items like jackets or sweaters. In garments worn close to the skin, especially in areas prone to sweating, it is common to opt for fiber types with higher moisture uptake capabilities. Attributing the need for more frequent washing solely to fiber types does not allow for a precise conclusion.</p> <p>For instance, many silk dresses are not washable or can only be hand-washed. Does this imply that silk should be considered a more durable choice? Can it then be promoted for use in women's panties, which require frequent washing?</p>	<p>ACCEPTED AND CLARIFIED.</p> <p>The text in section 9.6.2.2 regarding washing temperature and washing frequency has been modified.</p> <p>Moreover, the particularities of sportswear with regards to washing frequency have been highlighted.</p>
876	9.6.2.2; 40-43	<p>4. Can you share information on studies focusing on life-span? Dated and recent studies are relevant.</p> <p>Deep learning based system for garment visual degradation prediction for longevity, Pal, Rudrajeet, 2023</p> <p>https://hb.diva-portal.org/smash/record.jsf?aq2=%5B%5B%5D%5D&c=6&af=%5B%5D&searchType=RESEARCH&sortOrder2=title_sort_asc&lan</p>	<p>ACCEPTED.</p> <p>The mentioned study has been cited in Section 9.6.1.3 on quality assessment of apparel.</p>

ID	Statement; stated line	Comment	Answer
		guage=en&pid=diva2%3A1696601&aq=%5B%5B%7B%22personId%22%3A%22rpa%22%7D%5D%5D&sf=all&aqe=%5B%5D&sortOrder=dateIssued_sort_desc&onlyFullText=false&noOfRows=250&dswid=-4966	
877	96.2.5;4094	Ironing: Steaming not mentioned although in rise to replace ironing in both smoothing the wrinkles and prolonging time between washes as hot steam kills bacteria.	ACKNOWLEDGED AND CLARIFIED. Specific studies have not been found addressing the domestic use of steaming.
878	96.2.8 Repairing;4193-4260	[...] believes that repairability is an important aspect of sustainable product design and plays a significant role in extending product lifespan and reducing waste. The sportswear industry believes that establishing repairability as a mandatory product performance requirement at this stage would be premature for textiles. The repairability of a product is influenced by various factors, including material composition, seam construction, (virgin) component availability (including its implication in terms of sustainability and economic impact of storing additional materials) and repair skill level, especially relevant to technical textiles. Moreover, it is important to highlight that there are no industry standards to quantify repairability, and the discussion on this topic under the PEFCR for Apparel and Footwear is on the early stages. In consequence, [...] believes that qualitative information requirements within the DPP framework offers a more feasible and effective approach to promoting product repairability.	ACKNOWLEDGED.
879	96.3.1 page 201;43	One can question the reliability and representativeness of these studies on reasons for apparel disposal, especially considering the wide range observed for the factor of "intrinsic quality," spanning from 18% to 92%. Should the indicated study be weighted equally when calculating mean figures? It is noteworthy that the UK study with the largest number of participants reported the lowest value (18%) for the category of intrinsic quality.	Rejected While it is true that the factor of "intrinsic quality" shows a wide range (18% to 92%) across different studies, this variation highlights

ID	Stated section; stated line	Comment	Answer
	34-4340		<p>the diverse contexts and demographic segments captured in these studies.</p> <p>The variation in results reflects differences in consumer behaviors, regional attitudes, and survey methodologies, all of which are crucial for a comprehensive understanding of apparel disposal reasons. The UK study, with the largest number of participants, reported a value of 18% for intrinsic quality, but it is just one part of a broader dataset.</p> <p>Equal weighting of these studies helps to mitigate any bias that might arise from focusing too heavily on one particular</p>

ID	Stated section; stated line	Comment	Answer
			<p>study or region. By incorporating a wide range of data points, we ensure that the conclusions drawn are more representative of a diverse population. This approach captures the complexity and variability of consumer behaviors, providing a more holistic picture.</p> <p>Therefore, despite the observed variation, the combined data from these studies offer a sufficiently representative understanding of the factors influencing apparel disposal.</p>
880	96.3.1; 4341ff	We would like to highlight that the study referred to here does not look into durability of function, but merely aesthetic or robustness criteria.	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>Together with around 40 other organizations, we are participating in a multi-stakeholder research initiative by Sports Tech Research Centre within Mid Sweden University to pilot a method to differentiate durability of function in waterproof, breathable jackets. The results are expected to help understand durability of functionality and suggest a method on how durability of function can be measured and differentiated.</p> <p>We suggest allowing space for scientific studies like this to refine durability requirements and thresholds over time as methods evolve. For further information on that research project: https://www.miun.se/en/Research/research-centers/sports-tech-research-centre/durability-project/</p>	
881	9.6.3.1 page 201; 43-43-50	<p>This study was conducted in the UK, rather than within the EU, and focused on garments donated to charities for reuse, which may not represent a typical form of final disposal. Throughout this preliminary study, the potential importance of cultural and national differences has been highlighted in several sections. However, the Cooper and Claxton study lacks crucial information, such as the number of use and washing cycles the items had undergone before being discarded, as well as details on material type (yarn, fiber type) and any potential correlations with defects. Therefore, while the study's findings may be valuable, it is essential to approach them with caution and refrain from using them as the sole basis for determining durability performance and information requirements for the ESPR. It is possible that the observed defects are simply a normal aging phenomenon resulting from multiple wears.</p>	<p>ACKNOWLEDGED AND CLARIFIED.</p> <p>It is important to clarify that it is not the JRC's intention to solely use the analysis of user behavior to determine durability performance and information requirements for the ESPR, especially basing on the results of a single study. The JRC understands that the results from scientific papers and surveys indicated throughout the</p>

ID	Stated section; stated line	Comment	Answer
			Preparatory study are mostly informative and are treated with caution.
882	9.6.3.1 page 201 Table 75; 43 51	See the comment for lines 4341-4350	ACKNOWLEDGED
883	9.6.3.1 page 202; 43 57-43 59	We fully endorse a holistic perspective.	ACKNOWLEDGED.
884	9.6.3.1 page	One can question the reliability and representativeness of these studies regarding reasons for apparel disposal, particularly given the range observed for the factor of "intrinsic quality," spanning from 18% to 92%. It is noteworthy that the UK study with the largest number of participants reported the lowest value (18%) for the category of intrinsic quality.	REJECTED While it is true that the factor of "intrinsic

ID	Statement; stated line	Comment	Answer
	e 20 3 Table 76; 43 61		<p>quality" shows a wide range (18% to 92%) across different studies, this variation highlights the diverse contexts and demographic segments captured in these studies.</p> <p>The variation in results reflects differences in consumer behaviors, regional attitudes, and survey methodologies, all of which are crucial for a comprehensive understanding of apparel disposal reasons. The UK study, with the largest number of participants, reported a value of 18% for intrinsic quality, but it is just one part of a broader dataset.</p>

ID	Stated section; stated line	Comment	Answer
			<p>Equal weighting of these studies helps to mitigate any bias that might arise from focusing too heavily on one particular study or region. By incorporating a wide range of data points, we ensure that the conclusions drawn are more representative of a diverse population. This approach captures the complexity and variability of consumer behaviors, providing a more holistic picture.</p> <p>Therefore, despite the observed variation, the combined data from these studies offer a sufficiently representative understanding of the factors influencing apparel disposal.</p>

I D	St ate d sec tio n; sta ted lin e	Comment	Answer
8 8 5	9.6. 3.2; 43 72	Please be aware of the connection between a "digital label" and the "DPP" to avoid overlap of information and overflow of information for the consumer	ACKNOWLEDGED. To be considered in the coming steps of the Preparatory study.
8 8 6	9.6. 3.2 Dis pos al cha nne ls for app are l; 43 99	<p>We propose enriching Table 77 by incorporating an additional reference. The peer-reviewed study titled "Revealing the management of municipal textile waste and citizen practices: the case of Catalonia" (https://www.sciencedirect.com/science/article/pii/S0048969723067207?via%3Dihub) offers insights into the main types of alternative apparel disposal within the context of Catalonia, Spain. Integrating this reference would update the evidence provided. This reference is the most recent one, being published in 2024, and its results stem from a survey conducted between March and April of 2022.</p> <p>Information from the suggested reference for filling Table 77 in the draft can be found in the Supplementary Data of the proposed article, specifically in Table C2 under code 02. Aligning with the column headings of Table 77 in the draft and incorporating data from the recommended study, the results would be as follows: Sample and characteristics of the study -> 1469 participants (aged 16 to more than 65) 68.8% of the subjects were women; Country -> Spain (Catalonia Autonomous Community); Donate to charity -> 26%; Give to family/friends -> 48.9%; Used as cleaning cloth -> 32.5%; Discarded in the general waste bin at home -> 7.8%. In fact, more types of alternative apparel disposal are assessed in the proposed reference, such as sell second-hand through physical markets and online platforms or store it in a box and take it to the weekend house.</p>	ACCEPTED. The study has been cited accordingly.
8 8 7	An nex ; 44 85- 44 86	Certain studies (NRF, 2024, 2023 Consumer Returns in the Retail Industry) describe the phenomenon of 'wardrobing', which is intentionally purchasing luxury textile items to wear them for a special occasion and then send them back within the 14-day withdrawal period.	ACCEPTED. Reference to this study has been made in Section 9.6.3.4 on Returns.

12.7 Comments on section 9.7 – Supporting information about environmental labels and current EU Ecolabel criteria

Table 21. Comments on section 9.7 – Supporting information about environmental labels and current EU Ecolabel criteria

ID	Stated section; stated line	Comment	Answer
888	9.7.2; 4549	Considering post-consumer fibre-to-fibre recycled content will dramatically limit the applicability of the EU Ecolabel. There is a lack of documentation on the availability of fiber-to-fiber recycled content from post-consumer waste compared to the durability issues compared to the label.	Acknowledged
889	Comparison among Ecolabels (Page 215); Table 87 – Textile fibres	Question: Ecodesign labels to cover benefits of the processes (Biomass balance; biobased, PCF etc.) - where will we find which information on the label?	Clarification needed from the stakeholder The authors do not understand the comment. The stakeholder is invited to provide clarifications in the following consultation.
890	9.7.3; 4566 Table 87	Section 9.7.3: Table 87: Organic Cotton: Refers to various requirements of the EU Ecolabel, Nordic Swan and Blue Angel. This demonstrates that organic production of fibres is relevant, under different national, regional or international standards (e.g. EU, NOP, IFOAM) through schemes that meet ISO 17065. Both organic farm production and the processing of the standard under an appropriate standard should be a requirement of claiming an organic textile status of the final product. As has been pointed out elsewhere, the GOTS standard covers the processing of organic fibre to finished organic textile products and so should be included more clearly in Table 87.	Acknowledged
891	9.7.3 Comparison among Ecolabels - Table 87; 4566	Textile Exchange’s Global Recycled Standard (GRS) and the Responsible Claims Standards (RCS) referenced in this study p.214 and p.230. Textile Exchange oversees a suite of 8 raw materials standards, which cover most of the familiar fibres and raw materials in the fashion and textile industry today, including plant and animal fibres such as cotton, wool, down, leather; manmade cellulosic like viscose, and synthetics such as polyester and nylon. Please see below Textile Exchange’s standards that are not listed: - Organic Content Standard: The OCS aims to increase organic agricultural production - Responsible Wool Standard: The RWS improves the welfare of sheep and the land they graze on.	Acknowledged

ID	Stated section; stated line	Comment	Answer
		<p>- Responsible Mohair Standard: The RMS addresses animal and environmental responsibility for mohair.</p> <p>- Responsible Alpaca Standard: The RAS safeguards the welfare of alpacas and the ecosystems around them.</p> <p>- Responsible Down Standard: The RDS aims to protect ducks and geese used for down.</p> <p>- Content Claim Standard: The CCS is the basis of all our standards. It gives companies a means of verifying that one or more raw material inputs in the final product.</p> <p>For more information please refer to: https://textileexchange.org/standards/</p> <p>Additionally, for further information, this website provides a list of standards that can be filtered by theme, sector and product eg clothing: https://standardsmap.org/en/identify</p>	
892	9.7.3; 4570	<p>Section 9.7.3 specifically for Table 89, line 4570, "Durability of function" page 239:</p> <ul style="list-style-type: none"> • There is no waterproofness function included, only water repellency. Given that there exists a "Coating, laminates, and membranes" topic in Table 88, there is a clear reference to materials that are used to impart waterproof protection -- but no corresponding section in Table 89 to ensure that functionality. • In general, the "Durability of function" topic only addresses the impact of washing/drying on functionality, and does not capture anything specific to things that could occur during actual use. While Gore acknowledges that no externally accepted durability protocol exists, it is not clear whether the logic of using wash/dry cycles for now is both for product care AND as a surrogate for wear in the absence of a durability protocol. We would believe that both care and wear need to be accounted for - and if for now the labels would only support wash, we should call out a portion of cycles for care and an additional portion being used to capture the actual use wear --> with the goal of eventually moving away from these extra "wear" wash cycles to a protocol of more 	<p>Acknowledged</p> <p>The EU Ecolabel criteria will be revised after the finalization of the PS.</p>

ID	Stated section; stated line	Comment	Answer
		<p>direct/specific tests that could impact durability of function (like Mid Sweden University is trying to do).</p> <ul style="list-style-type: none"> • The water repellent function uses ISO 4920 (spray testing), which is not a good way to challenge a material's water repellency. Bundesmann gives a much better differentiation. 	

13 Comments on section 9 – List of references

Table 22. Comments on list of references

ID	Stated section; stated line	Comment	Answer
893	References; Workshop Question – literature missing re. to selection criteria?	The report of “A new textiles economy” is completely outdated (2017). Moreover, it is not scientific based but rather was performed by sustainability consultants and professionals mainly. The report does not include scientific based methodologies, assessment methods to stablish ecodesign criteria, neither how to measure its impacts or trade-offs between choosing one ecodesign criteria among other. It was a project by an NGO to be created by the consolidation of different inputs of the industry, with the aim of raising awareness of the need to transition toward circular practices in textiles.	Rejected The authors invite the stakeholder to provide other alternative references. The PS will develop the ecodesign requirements as described section 1.
894	References; 2656	Definition of nonwoven refers to US Industry association INDA, consider if reference to European industry association Edana is more appropriate.	Acknowledged
895	References; 2785	Invalid link, should be replaced	Accepted The link was replaced https://op.europa.eu/en/publication-detail/-/publication/b7650397-32f1-436c-82c4-df39aef297a3/language-en
896	References; 2866	This is a duplicate of the 2863-line entry and can be deleted	Accepted

List of abbreviations and definitions

Abbreviations	Definitions
ESPR	Regulation (EU) 2024/1781 establishing a framework for the setting of ecodesign requirements for sustainable products
PS	Preparatory Study on textile products

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