



JRC SCIENCE FOR POLICY REPORT

Preparatory study on textiles for product policy instruments

Ecodesign

EU Green Public Procurement

EU Ecolabel

2nd milestone

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Foreword

This document is the 2nd milestone of the preparatory study on textile products, which 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. In particular, the 2nd milestone addresses scope, market, user behaviour, current EU Ecolabel criteria, current EU Green Public Procurement criteria, and the product technologies. The preparatory study is developed within the legal context of the Regulation (EU) 2024/1781 establishing a framework for the setting of ecodesign requirements for sustainable products and the Regulation (EC) No 66/2010 on EU Ecolabel. The project is led by the Joint Research Centre of the European Commission, addressing the request from the Directorate-General for Environment (DG ENV) and the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW).

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1 Introduction

2 Context

3 On 13 June 2024, the Regulation on Ecodesign for Sustainable Products (ESPR) ⁽¹⁾ was published on the Official
4 Journal of the European Union. The ESPR delivers on the commitments made in both the European Green Deal ⁽²⁾
5 and the Circular Economy Action Plan ⁽³⁾ to make the European Union (EU) regulatory framework fit for a
6 sustainable future and to ensure that products placed on the EU market become increasingly sustainable.

7 The ESPR aims to reduce the environmental impacts of products across their life cycle and to improve the
8 functioning of the EU's internal market. It proposes to do this by building on the successful approach pioneered
9 under the Ecodesign Directive ⁽⁴⁾, which applies to energy-related products only. The ESPR proposes to extend
10 the Ecodesign Directive to cover a very broad range of physical products and to strengthen its provisions. This
11 would enable the ESPR to set a range of far-reaching ecodesign requirements for specific product groups, to
12 improve product circularity, energy performance and other environmental sustainability aspects. Ecodesign
13 requirements can be related to the performance of the product or information that must accompany the
14 product. A Digital Product Passport (DPP) will be required to hold and convey the information in question, with
15 traceability features.

16 The ESPR provides a general framework for these rules, with specific product requirements to be set at a later
17 stage via delegated acts dedicated to a particular product or to groups of similar products. These delegated
18 acts will also serve as the reference for the adoption of implementing acts, which should establish minimum
19 mandatory Green Public Procurement (GPP) requirements for public contracts.

20 Article 41(4) of the ESPR establishes synergies between the mandatory ecodesign legislative framework and
21 the EU Ecolabel, which is the EU's official voluntary label for environmental excellence awarded to best-in-class
22 products. The ESPR and EU Ecolabel requirements must be coherent and synergic to guarantee that products
23 awarded the EU Ecolabel comply with the ESPR requirements set in the relevant delegated act. The EU Ecolabel
24 remains regulated by the EU Ecolabel Regulation ⁽⁵⁾.

25 On 30 March 2022 the EC presented the EU Strategy for Sustainable and Circular Textiles ⁽⁶⁾ which aims, *inter*
26 *alia*, 'to tackle fast fashion and textile waste and to make textiles more durable, repairable, reusable and
27 recyclable'. The Textile Strategy lays out a forward-looking set of actions, which includes setting ecodesign
28 requirements for textiles under the framework of the ESPR proposal ⁽⁷⁾. The Textile Strategy also announces a
29 revision of the EU Ecolabel criteria for textile products to support its uptake among producers and offer
30 consumers an easily recognisable and reliable way to choose eco-friendly textile products.

31 Since 2019, the EC has supported the project 'Product Environmental Footprint Category Rules (PEFCR): apparel
32 and footwear', hereinafter named PEFCR A&F ⁽⁸⁾. Part of the textile industry leads this project, which aims to
33 establish rules for the calculation of the Product Environmental Footprint. Once produced, the PEFCR can be
34 used by the industry to voluntarily quantify and report the environmental impacts of specific textile products.
35 The EC follows the development of the PEFCR A&F project as an observer.

¹ ESPR. Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products. Available at [this link](#).

² The Green Deal. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions . The European Green Deal. COM(2019) 640 final. Available at [this link](#).

³ The Circular Economy Action Plan. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. A new Circular Economy Action Plan For a cleaner and more competitive Europe. COM(2020) 98 final. Available at [this link](#).

⁴ Ecodesign Directive. Directive 2009/125/EC of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for energy-related products. Available at [this link](#).

⁵ EU Ecolabel Regulation. Regulation (EC) No 66/2010 of the European Parliament and of the Council of 25 November 2009 on the EU Ecolabel. Available at [this link](#).

⁶ Textile Strategy. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. EU Strategy for Sustainable and Circular Textiles. COM(2022) 141 final. Available at [this link](#).

⁷ Proposal of ESPR by European Commission. Proposal for a Regulation of the European Parliament and of the Council establishing a framework for setting ecodesign requirements for sustainable products and repealing Directive 2009/125/EC. COM(2022) 142 final. Available at [this link](#).

⁸ 'Product Environmental Footprint Category Rules (PEFCR): apparel and footwear', available at [this link](#). Last accessed on 3 February 2024. It will set rules on the calculation and reporting of life cycle environmental impacts of apparel.

36 **Aim**

37 In this context, this report describes the preparatory study on textile products, which is hereinafter referred to
38 as the PS. The PS aims to provide the scientific and technical basis for:

- 39 — the future development of the ecodesign requirements for textile products to be defined in a
40 delegated act within the framework of the ESPR;
- 41 — the future development of the mandatory EU GPP requirements for textile products within the
42 framework of the ESPR;
- 43 — the future revision of the EU Ecolabel criteria for textile products ⁽⁹⁾, within the framework of the
44 ESPR and the EU Ecolabel Regulation.

45 **Methodology**

46 The PS will follow the structure prescribed by the Methodology for Ecodesign of Energy-related Products (MEErP)
47 (MEErP, 2011). This methodology has over many years proved to be comprehensive and effective for preparing
48 product-related legislation, and is therefore also deemed fit for non-energy-related products. The MEErP
49 consists of seven tasks:

- 50 — **Task 1 on scope** defines the boundaries of the system under analysis. It identifies the textile
51 products included in the scope of the PS and their categories. Additionally, it analyses legislative
52 and voluntary frameworks at global, EU and Member State level.
- 53 — **Task 2 on market** investigates the market structure, trends and other market characteristics of
54 the products in the scope.
- 55 — **Task 3 on user behaviour**. It describes how users relate to the products in the scope. It
56 investigates:
 - 57 (a) aspects influencing the design of the products, identifying potential barriers and restrictions
58 to possible ecodesign measures, due to social, cultural or infrastructural factors;
 - 59 (b) aspects influencing the modelling of environmental impacts and costs of the products in the
60 life-cycle perspective, identifying behaviour not directly quantifiable with conventional
61 standard tests on the products.
- 62 — **Task 4 on technologies** entails a general technical analysis of the products in the scope in order
63 to describe the average products on the market, as well as the best available technologies (BAT)
64 and the best not yet available technologies (BNAT).
- 65 — **Task 5 on environmental and economic analysis** of the average products on the EU market.
66 It defines *base case* products, which are a conscious abstraction of the reality for practical reasons,
67 and it represents a specific product category. The description of the base case is the synthesis of
68 tasks 1 to 4 and the starting point for the following tasks. The base case is analysed via models
69 based on Life Cycle Assessment (LCA) and Life Cycle Costing (LCC).
- 70 — **Task 6 on design options** investigates the monetary consequences of the design options in terms
71 of cost within the life cycle for consumers and society. Environmental costs and benefits are also
72 investigated using the Least Life Cycle Costs (LLCC) and the BAT. The BNAT indicate long-term
73 possibilities.
- 74 — **Task 7 on possible policy scenarios** gathers the results of all previous tasks and investigates
75 suitable policy means to achieve the potential improvements in the environmental impacts of the
76 assessed products, as well as estimating economic impacts on consumers and the industry. Finally,
77 it assesses the robustness of the outcomes via a sensitivity analysis.

78 The methodology used will be adapted to the specific features of the textile product group and the requirements
79 set by the ESPR.

⁹ EU Ecolabel criteria for textile products. Commission Decision of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products. Commission Decision (2014/350/EU). Available at [this link](#).

80 In addition to following the tasks set by the MEErP, the PS will include all elements of the Preliminary Report,
81 to be used for the revision of the EU Ecolabel criteria for textile products ⁽⁹⁾, as set by the EU Ecolabel
82 Regulation ⁽⁵⁾.

83 Due to their aims, future mandatory EU GPP requirements and future revised EU Ecolabel criteria of products
84 included in the scope of the PS will be built up from the ecodesign requirements.

85 **Involvement of stakeholders**

86 The development of the PS will include the direct involvement of stakeholders following the principles of the
87 Sevilla process ⁽¹⁰⁾, which will enable the JRC to verify with stakeholders the work under development and collect
88 additional evidence on the investigated topics.

89 **Table 1** reports the stages of the project that will require the participation of registered stakeholders. Any
90 organisation, institution and citizen can register as a stakeholder by filling in a form on a dedicated webpage ⁽¹¹⁾.
91 Stakeholders will be able to register at any stage of the development of the PS.

92 **Table 1.** Development of the preparatory study

Milestone	Topic addressed	Date
Initial questionnaire ⁽¹²⁾	Definitions, scope, market analysis, user behaviour, product aspects, EU Ecolabel, EU Green Public Procurement	30 March 2023 – 8 May 2023
1 st milestone	Scope, market, user behaviour, current EU Ecolabel criteria, current EU Green Public Procurement criteria	23 February to 22 April 2024
2 nd milestone	Technologies, framework and data gaps of environmental and economic model, and a questionnaire about substances and substances of concern	14 November 2024 to 17 March 2025 (*)
3 rd milestone	Analysis of base case and design options	To be communicated
4 th milestone	Policy scenarios, and elements to be included in the Digital Product Passport	To be communicated

93 The number and topics of the milestones could be modified to improve the involvement of the stakeholders during the development of the
94 preparatory study.

95 (*) The 2nd milestone includes the following steps: (a) from 14 November to 8 December 2024, registered stakeholders may read the section
96 on product technologies before the online consultation meeting; (b) from 2 to 9 December 2024, registered stakeholders may read
97 the questionnaire on substances and substances of concern; (c) on 9 and 10 December 2024, registered stakeholders and JRC
98 attended the online consultation meeting; (d) from 18 December 2024 to 3 March 2025, registered stakeholders will be able to
99 provide comments in writing to the working document; (e) from 18 December 2024 to 10 March 2025, registered stakeholders will
100 be able to contribute to the questionnaire on substances and substances of concern; (d) from 18 December 2024 to 17 March 2025,
101 registered stakeholders will be able to contribute to improve the inventory and framework of the environmental and economic model.

102 For each milestone, the stakeholder consultation will include the following steps:

- 103 • The JRC will communicate by email to all registered stakeholders the time and steps of the
104 specific consultation, as well as the document(s) related to the milestone. All documents will
105 be uploaded on the project's website ⁽¹³⁾.
- 106 • Registered stakeholders will read the document(s) before the online consultation meeting.
- 107 • JRC and registered stakeholders will attend the online consultation meeting. In this meeting,
108 registered stakeholders will be able to have open discussions with the JRC and among
109 themselves.
- 110 • Registered stakeholders will provide comments on the working document(s).
- 111 • The JRC will publish on the project's website ⁽¹³⁾ a document containing anonymised written
112 comments submitted by the registered stakeholders.

¹⁰ 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".

¹¹ Stakeholders can participate in the development of the preparatory study on textile products by registering via this [web form](#).

¹² Initial questionnaire. Preparatory Study on textiles for product policy instruments – the initial questionnaire. Available at [this link](#).

¹³ The textile project website is available at [this link](#). Documents will be uploaded in the dedicated section available at [this link](#).

113 All entities involved in the stakeholder consultations will have enough time to actively participate in the process.

114

115 This version of the PS reports the 2nd milestone and it includes some of the information collected by the initial
116 questionnaire ⁽¹²⁾.

117

118 **Structure of the preparatory study – 2nd milestone**

119 After this introduction, Section 2 provides the definitions of words and expressions used in the document.

120 Section 3 defines the scope and describes the products included in it, providing also a first insight into their life-
121 cycle stages and main environmental burdens. This brief description provides the reader with a basic knowledge
122 useful to better understand the topics investigated in the following sections.

123 Section 4 analyses legislation and strategies at different levels: EU, Member State, third country, and global,
124 the latter describing initiatives of the United Nations. Section 4 is completed by the analysis of the most relevant
125 test methods, standards and environmental labels used internationally by the textile industry.

126 Section 5 analyses the market of the textile products belonging to the scope. The analysis is performed at
127 global, EU and Member State levels. Additionally, Section 5 investigates the market of the main elements
128 affecting the manufacturing of the products included in the scope. The market analysis includes some insights
129 into the market structure, most common business models, and it reports the main characteristics of the value
130 chain. A specific subsection is dedicated to market competitiveness, which is affected by the different costs
131 that companies face around the world due to the different requirements related to environmental protection.
132 Section 5 concludes with a subsection analysing the lifespan of products, because it largely affects the market
133 and the demand for new products.

134 Section 6 analyses user behaviour, which will be relevant for: (1) modelling the products in the economic and
135 environmental assessment, and (2) the analysis of possible ecodesign requirements within the product aspects
136 listed by Article 5 of the ESPR. The section addresses the behaviour before and after the purchase, as well as
137 behaviour related to the disposal of the textile product.

138 Section 7 analyses the current EU Ecolabel criteria for textile products in light of their revision. Facts and figures
139 of the current criteria are reported as well as the suggestions received via the initial questionnaire. The section
140 describes the relationship between the new mandatory ecodesign framework (ESPR) and the revision of the EU
141 Ecolabel criteria for textile products. To explore potential synergies with other officially recognised Ecolabels,
142 Section 7 provides a detailed comparison of the criteria for textile products set by the EU Ecolabel, Blue Angel
143 and Nordic Swan.

144 Section 8 collects information for the future development of mandatory EU GPP criteria. To this aim, this section
145 assesses the current public procurement of apparel in the EU, and the current status of the voluntary EU GPP
146 criteria.

147 Section 9 provides a general technical analysis of the products in the scope from the perspective of the relevant
148 product aspects listed by Article 5 of the ESPR.

149 **2 Definitions**

150 This section lists the definitions of terms and expressions used in the document. It will be complemented with
151 more definitions as the project goes through its milestones (see Section 1).

152 **Textile fibre**

153 'Textile fibre' means either of the following ⁽¹⁴⁾:

- 154 — a unit of matter characterised by its flexibility, fineness and high ratio of length to maximum
155 transverse dimension, which render it suitable for textile applications;
- 156 — a flexible strip or tube, of which the apparent width does not exceed 5 mm, including strips cut
157 from wider strips or films, produced from the substances used for the manufacture of the fibres
158 listed in Table 2 of Annex I to Regulation 1007/2011 and suitable for textile applications.

159 **Textile product**

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

163 The definition of textile product is aligned with the definition provided by the Textile Labelling Regulation
164 (TLR) ⁽¹⁴⁾.

165 **Textile apparel**

166 'Textile apparel' are textile products that aim to cover the body with everything except footwear. In addition, it
167 also means a textile product worn as clothing or a clothing accessory by a person to clothe and/or adorn, and/or
168 shield from, and/or feel comfortable with the outer environment and/or to express their personal and
169 professional identity and/or belonging to a specific social group, with symbolic meanings and aesthetic values.

170 **Technical textile**

171 Technical textiles are textile products meeting technical rather than aesthetic criteria, even if, for certain
172 markets like workwear or sports equipment, both types of criteria could be met. Technical textiles bring a
173 functional answer to a wide range of specific requirements: lightness, resistance, reinforcement, filtration, fire
174 retardancy, conductivity, insulation, flexibility, absorption and so on. The definition does not depend on the raw
175 material, the fibre or the technology used, but on the expected inherent functionality of the product itself.
176 Technical textiles can be used by professionals or not.

177 Textile apparel meeting the definition above is defined as *technical textile apparel*.

178 The definition of technical textiles is aligned with the definition provided by the European Economic and Social
179 Committee ⁽¹⁵⁾.

180 **Home/interior textiles**

181 Textile products used indoor or outdoor to protect the object they are used on/with, decorate the home/interior
182 environment, or dry the body or parts of the body after they have become wet.

183 **Footwear**

184 'Footwear' means all articles with applied soles designed to protect or cover the foot, including parts marketed
185 separately ⁽¹⁶⁾.

¹⁴ Textile Labelling Regulation. Regulation (EU) No 1007/2011 of the European Parliament and of the Council of 27 September 2011 on textile fibre names and related labelling and marking of the fibre composition of textile products and repealing Council Directive 73/44/EEC and Directives 96/73/EC and 2008/121/EC of the European Parliament and of the Council. Available at [this link](#).

¹⁵ CCMI/105, Technical textiles, Brussels, 17 April 2013, OPINION of the European Economic and Social Committee on Growth Driver Technical Textiles. (own initiative opinion). Rapporteur: Ms Butaud-Stubbs. Corapporteur: Ms Niestroy. Available at [this link](#). Last accessed on 30 March 2023.

¹⁶ Directive 94/11/EC of European Parliament and Council of 23 March 1994 on the approximation of the laws, regulations and administrative provisions of the Member States relating to labelling of the materials used in the main components of footwear for sale to the consumer. Available at [this link](#).

186 **Textile waste**

187 Textile waste is a textile product which the holder discards or intends or is required to discard ⁽¹⁷⁾.

188 **Post-industrial textile waste**

189 Post-industrial textile waste is textile waste generated during the manufacturing of textile products and their
190 precursors (manufacturing of fibre, yarn and fabric, and during confectioning) (Huygens et al., 2023)

191 **Pre-consumer textile waste**

192 Pre-consumer textile waste is textile waste generated as a result of discarding unsold textile products.

193 **Post-consumer textile waste**

194 Post-consumer textile waste is a textile product that have been discarded after consumption and use by the
195 citizen or end-users of commercial and industrial activities (hotel, care, automotive, etc.). For this reason it is
196 commonly referred to as household and commercial post-consumer textile waste, respectively (Huygens et al.,
197 2023).

198 **Final product**

199 A final product is understood to be a product that is already suitable for users ⁽¹⁸⁾.

200 **Intermediate product**

201 'Intermediate product' means a product that requires further manufacturing or transformation such as mixing,
202 coating or assembling to make it suitable for end-users ⁽¹⁹⁾.

203

204 **Table 2** reports the definitions of the 16 product aspects reported in article 5 of the ESPR. The hierarchy applied
205 for selecting the most appropriate source for each definition was the following: the current legislation, standards
206 and scientific literature. In some cases, the authors have adapted the definition from those sources.

207 **Table 2.** Definition of product aspects

Product aspect	Definition	Source
Durability	The ability of a product to maintain over time its function and performance under specified conditions of use, maintenance and repair.	ESPR
Reliability	The probability that a product functions as required under given conditions for a given duration without an occurrence which results in a primary or secondary function of the product no longer being performed	ESPR
Reusability	Ability of a product or component that is not waste to be used again for the same purpose for which it was conceived.	JRC (adapted based on Directive 2008/98/EC definition for 'Re-use')
Upgradability	Ability of a product to be accessible for implementing actions to enhance its functionality, performance, capacity, safety or aesthetics.	JRC (adapted based on ESPR definition for 'Upgrading')
Repairability	Ability of a defective product or waste object to return to a condition where it fulfils its intended use.	JRC (adapted based on ESPR definition for 'Repair')
Possibility of maintenance	Ability of a product to be kept in a condition where it is able to fulfil its intended purpose through one or more actions.	JRC (adapted based on ESPR definition for 'maintenance')

¹⁷ The definition of textile waste is inspired by the definition of waste reported by the Waste Framework Directive (WFD). Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (Text with EEA relevance). Available at [this link](#).

¹⁸ The definition of final product is implied from the ESPR.

¹⁹ The definition of intermediate product is reported in Article 2(3) of the ESPR.

Product aspect	Definition	Source
Possibility of refurbishment	Ability of a product or a discarded product to be prepared, cleaned, tested, serviced and, where necessary repaired to restore its performance or functionality within the intended use and range of performance originally conceived at the design stage at the time of the placing of the product on the market.	JRC (adapted based on ESPR definition for 'refurbishment')
Presence of substances of concern	The presence of substances that: - meet the criteria laid down in Article 57 of Regulation (EC) No 1907/2006 and are identified in accordance with Article 59(1) of that Regulation - are classified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 in one of the hazard classes or hazard categories listed under Article 2(27)(b) of ESPR - are regulated under Regulation (EU) 2019/1021; or - negatively affect the reuse and recycling of materials in the product in which they are present	ESPR
Energy use and energy efficiency	<u>Energy use</u> : Use of energy in all lifecycle stages of a product <u>Energy efficiency</u> : the ratio of output of performance, service, goods or energy to input of energy.	JRC JRC
Water use and water efficiency	<u>Water use</u> : Use of water in all lifecycle stages. <u>Water efficiency</u> : The ratio of output of performance, service, goods to input of water.	JRC JRC
Resource use and resource efficiency	<u>Resource use</u> : Use of raw materials, mainly abiotic (minerals, metals, fossil fuels), in all lifecycle stages. It can also include other biotic resources such as land, air, ecosystems. The use of natural resources can be accounted for as the volumes of resources consumed (materials) or used (land, air, ecosystems), or the impacts derived from the use of resources. Water and energy are not considered within resources under the scope of ESPR. <u>Resource efficiency</u> : The ratio of output of performance, service, goods to input of resources, raw materials, air, land, soil and ecosystem services.	JRC and (BIO Intelligence Service, DG for Enterprise and Industry (EC), 2013)
Recycled content	Proportion, by mass, of recycled material, from pre- and post-consumer waste, in a product or packaging.	ISO 14021
Possibility of remanufacturing	Possibility of producing through actions a new product from objects that are waste, products or components and through which at least one change is made that may affect the performance, purpose or type of the product.	JRC (adapted based on ESPR definition for 'Remanufacturing')
Recyclability	Ability of products after becoming waste to be reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.	JRC (adapted based on Directive 2008/98/EC definition for 'recycling')
Possibility of recovery of materials	Ability of products after becoming waste to be recovered through any recovery operation, other than energy recovery and the reprocessing into materials that are to be used as fuels or other means to generate energy. It includes, inter alia, preparing for re-use, recycling and backfilling.	JRC (adapted based on Directive 2008/98/EC definition for 'material recovery')
Environmental impacts	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from a product during its life cycle	ESPR
Expected generation of waste	Generation of any substance, or object that the holder discards or intends or is required to discard.	JRC (adapted based on Directive 2008/98/EC definition for 'waste')

209 **3 Scope**

210 This section selects and describes the products included in the scope of the PS. The first subsection (Section
211 3.1) reports the thought process followed to select the scope in accordance with the framework set by the ESPR.
212 The second subsection (Section 3.2) lists the products included in the scope and specifies those that are
213 excluded. The final subsection (Section 3.3) describes two important aspects of textile products that apply to
214 the products in the scope, i.e. the life-cycle stages and their main factors influencing the negative environmental
215 impacts. This last section is the essential basis for fully understanding a number of topics addressed in
216 subsequent sections about environmental labels (Section 4.5), the market analysis (Section 5), and the analysis
217 of product technologies (Section 9). Nevertheless, the topics mentioned in Section 3.3 will be detailed in the
218 following milestones, when the PS addresses Task 5 of the MEERP.

219 **3.1 Selection of the scope**

220 Within the framework of the European Industrial Strategy ⁽²⁰⁾, the Annual Single Market Report 2021 ⁽²¹⁾
221 identifies the products included in the **industrial ecosystem of textiles**: *‘transformation of natural (e.g.
222 cotton, flax, wool), man-made and artificial (synthetic polyester and viscose) fibres into yarns and fabrics,
223 production of yarns, home textiles, industrial filters, technical textiles, carpets and clothing. The ecosystem also
224 includes production of footwear and leather.’*

225 The EC is currently working on the first ESPR Working Plan, taking into account among other things a report ⁽²²⁾
226 entitled ‘Ecodesign for Sustainable Products Regulation: Study on new product priorities’, hereinafter referred
227 to as the **Product Priorities Study**. It suggests a number of product groups and horizontal measures that may
228 be suitable candidates for prioritisation under the ESPR. The first Product Priorities Study served as the basis
229 for an open public consultation ⁽²³⁾. Among the many product groups in the scope of the ESPR, the Product
230 Priorities Study assesses a product group named **‘textiles and footwear’**, which includes products belonging
231 to the industrial ecosystem of textiles. Respondents to the open public consultation agreed to prioritise this
232 product group (58% of respondents), and they considered it of highest priority (68% of respondents). 38% of
233 respondents considered that apparel should be prioritised, followed by footwear (25%) and home/interior
234 textiles (18%).

235 The scope of the PS was defined following the Product Priorities Study, and the selection criteria reported in
236 Article 5(4), Article 5(7) and Article 18 of the ESPR.

237 Within the product group textiles and footwear, the Product Priorities Study identifies four main subgroups: (1)
238 textile apparel, (2) home/interior textiles (e.g. bed linen, towels, tablecloths, curtains), (3) footwear, and (4)
239 technical textiles not included in previous subgroups, usually or also meant for consumers, such as truck covers
240 (tarpaulins) and cleaning products, or specifically meant for industry (automotive, construction, medical,
241 agriculture, etc.). Although it is not specified in the Product Priorities Study, the subgroups textile apparel,
242 home/interior textiles and technical textiles are understood to be products containing at least 80% by weight
243 of textile fibres, as defined by the TLR ⁽¹⁴⁾. This interpretation of subgroups is also adopted in the PS.

244 The product group textiles and footwear is considered to be too heterogeneous for the setting of common
245 ecodesign requirements. This heterogeneity is driven by the specific functions and end uses of each subgroup,
246 as reported in **Table 3**, as well as their material and chemical compositions. The specific function of a product
247 requires specific tests to be performed on the product to verify its performance.

²⁰ European Industrial Strategy. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions updating the 2020 New Industrial Strategy: Building a stronger Single Market for Europe’s recovery. COM(2021) 350 final. Available at [this link](#).

²¹ Annual Single Market Report 2021. Accompanying the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Updating the 2020 New Industrial Strategy: Building a stronger Single Market for Europe’s recovery. SWD(2021) 351 final. Available at [this link](#).

²² Ecodesign for Sustainable Products Regulation: Study on new product priorities. Available at [this link](#). Last accessed on 17 December 2024.

²³ New product priorities for Ecodesign for Sustainable Products. Available at [this link](#). Last accessed on 5 February 2024.

248 **Table 3.** Function and intended use of subgroups in the textiles and footwear product group

Subgroup	Function and intended use
Textile apparel	Textile apparel have the following functions and intended uses: (1) protect the human body from the outer environment, such as preventing heat loss, exposure to the sun, penetration of water, etc.); (2) comply with legal obligations related to public body exposure, because in EU countries being necked in public is forbidden; (3) self-representation, driven by expression of personal identity and/or expression of belonging to a specific social group, with symbolic meanings and aesthetic values; (4) social acceptance when gathering with other people, for example at parties, work places, religious ceremonies, etc.
Home/interior textiles ^(a)	Most home/interior textiles have at least two functions: (1) protect the object they are used on/with, e.g. a cushion case protects the enveloped cushion, a tablecloth protects the table underneath, a curtain protects the indoor environment by filtering the light coming from outside, etc.; (2) decorate the home/interior environment. Products like towels have the function of drying the body or parts of the body after they have become wet (e.g. after washing, swimming, etc.).
Footwear ^(b)	Footwear has similar functions to apparel: (1) protect the feet from the outer environment; (2) self-representation, driven by expression of personal identity and/or expression of belonging to a specific social group, with symbolic meanings and aesthetic values.
Technical textiles	Technical textiles have specific technical (non-aesthetical) functions according to their final application. Two examples are reported. Textile cleaning products have the function of removing dust and dirt from surfaces, interacting with detergents and other cleaning chemicals. Reusable textile absorbent hygiene products have the function of handling fluids, delivering protective properties like absorption, protecting the environment from unintentionally released body waste. In particular, reusable baby diapers must be flexible, so that they are comfortable and adaptable to changing body size.

249 ^(a) Construction products, as defined in Regulation (EU) No 305/2011, are not considered home/interior textiles.
 250 ^(b) According to Directive 94/11/EC ⁽²⁴⁾, 'footwear' means all articles with applied soles designed to protect or cover the foot, including parts
 251 marketed separately. Due to the significant relative weight of soles in the overall weight of a footwear article and to the fact that
 252 soles are seldom composed of textile fibres, footwear products are seldom textile products.

253 The identified subgroups were further analysed following criteria reported in Article 5(4), Article 5(7) and Article
 254 18 of the ESPR. Article 18 of the ESPR states the following:

255 *When prioritising products to be covered by ecodesign requirements, the Commission shall analyse the potential*
 256 *contribution of those products to achieving Union climate, environmental and energy efficiency objectives, taking*
 257 *into account the following criteria:*

- 258 a) *the potential for improving the product aspects without entailing disproportionate costs, [...];*
- 259 b) *the volume of sales and trade of the product within the Union;*
- 260 c) *the distribution across the value chain of the climate and environmental impacts, energy use, resource*
 261 *use and waste generation concerning those products;*
- 262 d) *the need to regularly review and adapt delegated acts adopted pursuant to Article 4 in light of*
 263 *technological and market developments.*

264 Article 5(4) of the ESPR states the following:

265 *Ecodesign requirements shall be set for a specific product group ⁽²⁵⁾. They may be differentiated for any specific*
 266 *product that belongs to that specific product group.*

267 Article 5(7) of the ESPR states the following:

²⁴ Directive 94/11/EC of European Parliament and Council of 23 March 1994 on the approximation of the laws, regulations and administrative provisions of the Member States relating to labelling of the materials used in the main components of footwear for sale to the consumer. Available at [this link](#).
²⁵ Article 2 of the ESPR establishes the following definition: 'product group' means a set of products that serve similar purposes and are similar in terms of use, or have similar functional properties, and are similar in terms of consumer perception.

268 *Where two or more product groups display one or more similarities allowing a product aspect to be effectively*
269 *improved based on common information requirements or performance requirements* ⁽²⁶⁾, *horizontal ecodesign*
270 *requirements may be set for those product groups ('horizontal ecodesign requirements'). When considering*
271 *whether to set horizontal ecodesign requirements, the Commission shall also take into account the positive*
272 *effects of those requirements towards reaching the objectives of this Regulation, in particular the ability to cover*
273 *a wide range of product groups in the same delegated act. The Commission may supplement the horizontal*
274 *ecodesign requirements through the setting of ecodesign requirements for a specific product group.*

275 For all subgroups of the textiles and footwear product group reported in the Product Priorities Study, the
276 following subsections report information related to the three main scope selection criteria pointed out by Article
277 18: (a) potential for improvement (Section 3.1.1), (b) volume of sales and trade in the EU (Section 3.1.2), and
278 (c) the distribution of the climate and environmental impacts, energy use, resource use and waste generation
279 across the value chain (Section 3.1.3). Point (d) of Article 18 was not considered because there is no delegated
280 act on textiles and footwear products to be reviewed.

281 Information related to the textiles and footwear sectors is reported with a granularity that changes according
282 to the aims of the specific studies. The subsequent sections (from 3.1.2 to 3.1.3) try to interpret the available
283 data in the most holistic way to meet the requirements set by Article 18 of the ESPR.

284 **3.1.1 Potential improvement considering product aspects in Article 5(1) of the ESPR**

285 The analysis reported in this section is only a first indicative investigation of potential improvements based on
286 a literature review. Once the scope is defined, specific improvement potential will be assessed via environmental
287 and economic assessments in the following stages of the PS. In particular, this will be performed in the following
288 milestones addressing tasks 5 to 7 of the MEErP (see Section 1).

289 Article 5(1) of the ESPR lists the following product aspects:

- 290 — durability;
- 291 — reliability;
- 292 — reusability;
- 293 — upgradability;
- 294 — repairability;
- 295 — the possibility of maintenance and refurbishment;
- 296 — the presence of substances of concern;
- 297 — energy use and energy efficiency;
- 298 — water use and water efficiency;
- 299 — resource use and resource efficiency;
- 300 — recycled content;
- 301 — the possibility of remanufacturing;
- 302 — recyclability;
- 303 — the possibility of the recovery of materials;
- 304 — environmental impacts, including carbon footprint and environmental footprint;
- 305 — expected generation of waste.

²⁶ Article 2 of the ESPR establishes the following definitions:
'*ecodesign requirement*' means a performance requirement or an information requirement aimed at making a product, including processes taking place throughout the product's value chain, more environmentally sustainable;
'*performance requirement*' means a quantitative or non-quantitative requirement for or in relation to a product to achieve a certain performance level in relation to a product parameter referred to in Annex I;
'*information requirement*' means an obligation for a product to be accompanied by information as specified in Article 7(2).

306 Many studies underline the great potential for improvement regarding product aspects of textile apparel. In
307 particular, the literature suggests six most important product aspects:

- 308 — Increasing all features of product **durability** (Ellen MacArthur Foundation, 2017; Bauer, Watson,
309 Gylling, Remmen, Lysemose, Chatarina Hohenthal, et al., 2018; Sandin, Roos, Spak, et al., 2019;
310 Claxton and Kent, 2020a; Goworek, L. Oxborrow, et al., 2020; Niinimäki et al., 2020; Cooper and
311 Claxton, 2022a; Nordic Ecolabelling, 2022; OVAM, 2022; Horn et al., 2023; TAUW, 2023; Dodd and
312 Gama, 2017; Aakko and Niinimäki, 2021).
- 313 — Possibility of **maintenance** and how best to use the textile product during its lifetime (Ellen
314 MacArthur Foundation, 2017; Bauer, Watson, Gylling, Remmen, Lysemose, Chatarina Hohenthal, et
315 al., 2018; Nordic Ecolabelling, 2022; OVAM, 2022; Horn et al., 2023).
- 316 — **Repairability** (Bauer, Watson, Gylling, Remmen, Lysemose, Chatarina Hohenthal, et al., 2018;
317 Niinimäki et al., 2020; Botta, 2021; EEA, 2022a; OVAM, 2022; TAUW, 2023).
- 318 — Regulating the **presence of substances of concern**, from the perspective of eliminating or
319 reducing the use of these substances (Ellen MacArthur Foundation, 2017; Bauer, Watson, Gylling,
320 Remmen, Lysemose, Chatarina Hohenthal, et al., 2018; Niinimäki et al., 2020; Mohapatra and
321 Gaonkar, 2021; EEA, 2022b; Nordic Ecolabelling, 2022; OVAM, 2022; TAUW, 2023; Dodd and Gama,
322 2017).
- 323 — **Recycled content and possibility of recovery of materials** (Ellen MacArthur Foundation,
324 2017; Bauer, Watson, Gylling, Remmen, Lysemose, Chatarina Hohenthal, et al., 2018; Niinimäki et
325 al., 2020; ECOS et al., 2021; EEA, 2022b; Nordic Ecolabelling, 2022; OVAM, 2022; Horn et al., 2023;
326 Dodd and Gama, 2017).
- 327 — **Possibility of recycling** (Niinimäki et al., 2020; ECOS et al., 2021; EEA, 2022b; Nordic
328 Ecolabelling, 2022; OVAM, 2022; Horn et al., 2023; TAUW, 2023; Dodd and Gama, 2017).

329 Most of the studies listed above do not specify the kind of requirements, but they suggest focussing on the
330 specific product aspect to best decrease the environmental impacts of the apparel:

- 331 • Significant improvement potential is associated with increasing the product lifespan, which
332 could be achieved by increasing the physical and emotional durability⁽²⁷⁾ of the product,
333 improving product care, and facilitating/supporting reparability. Increasing the durability of
334 products is considered an effective strategy to decrease the environmental impacts of this
335 product group. It was estimated that, over the last 20 years, the use time of apparel decreased
336 by 36%, with each product used only seven or eight times on average (Ellen MacArthur
337 Foundation, 2017). This results in a significant amount of waste originating from used apparel.
338 Extending the lifespan of 50% of apparel by an extra 9 months of active use would reduce
339 carbon, water and waste footprints by around 4-10% each (WRAP, 2017a).
- 340 • The literature reports a relevant concern about the hazards of substances used and contained
341 in textile apparel. The use of alternative substances with a reduced hazard profile is
342 considered a crucial aspect to pursue.
- 343 • In line with the Circular Economy Action Plan, the literature considers product circularity
344 aspects to show good improvement potential, such as increasing the recycled content and
345 promoting recyclable products.

346 Only Bauer et al. (2019), OVAM (2022) and TAUW (2023) further suggest specific criteria that would decrease
347 the environmental footprint of textile apparel. Differently, (Sandin, Roos, Spak, et al., 2019) reports the
348 possibility to decrease the environmental impacts of these products using a less impacting source of energy,
349 such as solar energy.

350 Most of the product aspects listed above could also be valid for home/interior textiles and footwear, which are
351 usually included in studies focusing on generic textile products. This is the case of studies like Ellen MacArthur
352 Foundation (2017), ECOS (2021), and Mohapatra and Gaonkar (2021). However, any ecodesign requirement
353 under a specific product aspect should always consider the specific function that the textile product performs.

²⁷ Emotional durability is the product's ability to stay relevant and desirable to the consumer (Anthesis, 2015).

354 Therefore, the potential adoption of the same product aspects for textile apparel and home/interior textiles
 355 should consider that the two subgroups, and their categories, perform different functions. This distinction is one
 356 of the numerous factors driving the grouping of textile products that are included in the scope of the PS.

357 The literature review did not reveal specific studies about potential improvements to generic technical textiles.
 358 This could be explained by the numerous specific applications of the technical textiles that are adopted in many
 359 sectors.

360 The literature review showed that textile apparel, but also to some extent home/interior textiles and footwear,
 361 have the potential for improvement under various product aspects. In the following milestones, the PS will
 362 assess all the product aspects set out in Article 5(1) of the ESPR.

363 3.1.2 Amount of sales and trade in the EU

364 Information reported in the PRODCOM database⁽²⁸⁾ was processed and analysed to quantify the amount of
 365 sales and trade in the EU in the textiles and footwear subgroups. The classification of products into subgroups
 366 was based on the European Statistical System, which is described in detail in Section 10.1.

367 The analysis targeted the market indicators production, import, export and apparent consumption⁽²⁹⁾ of the EU-
 368 27⁽³⁰⁾ in 2019. This year was chosen because it was the latest year free from market disruptions, such as the
 369 COVID-19 pandemic (2020) and the increase of EU energy prices (2022). **Table 4** reports the results of the
 370 analysis, which show that the textile apparel subgroup has the largest share of the market for all market
 371 indicators expressed in value and the largest share of the import and apparent consumption expressed in mass.

372 **Table 4.** Economic indicators of textiles and footwear in the EU-27 in 2019

Subgroup	Production		Import		Export		Apparent consumption	
	Mass (bn kg)	Value (bn EUR)	Mass (bn kg)	Value (bn EUR)	Mass (bn kg)	Value (bn EUR)	Mass (bn kg)	Value (bn EUR)
Textile apparel	0.8	33	4.67	80.84	0.62	36.02	4.85	77.82
Home/interior textiles	1.83	14.87	2.04	12.09	0.59	4.9	3.28	22.07
Footwear	0.57	19.83	1.72	21.27	0.28	14.46	2.01	26.64
Technical textiles	3.65	18.07	0.69	4.03	0.79	6.24	3.55	15.86

373 N.B. Colour shades from red to white rank the subgroups from the largest to the smallest share of the economic indicator.
 374 Figures related to economic indicators expressed in mass could be underestimated because some PRODCOM codes did not contain
 375 information. This is caused by the data collection system that allows Member States to avoid, in specific cases, reporting information
 376 expressed as quantity of goods. More information is available in Section 10.1.

377 *Source: own analysis using PRODCOM dataset DS-056120 (data extracted on 15 November 2023)*

378 3.1.3 Environmental impacts and waste generation across the value chain

379 The literature shows that environmental impacts caused by textile products were studied using numerous levels
 380 of granularity. Most of the studies focused on ‘textiles’, ‘textile sector’, ‘textile industry’, without clearly
 381 specifying which subgroup was included. In this screening of the literature, the term ‘textiles’ is assumed to
 382 include textile apparel, home/interior textiles and technical textiles.

383 The literature seems to treat the terms ‘apparel’, ‘clothing’ and ‘garments’ as synonyms, which raises doubts
 384 on whether clothing accessories are always included; whereas it addresses footwear separately. The same
 385 literature refers to ‘fashion’, which forms a major component of the product group ‘apparel and footwear’, and
 386 it can be understood as including the subgroups textile apparel and footwear. The authors understand that
 387 fashion includes leather and fur apparel, which are not part of this PS in view of its focus on textile products
 388 according to the definition under the TLR.

²⁸ PRODCOM database (Sold production, exports and imports – DS-056120). Available at [this link](#).

²⁹ The apparent consumption is defined as the sum of production and import, minus the export. Production, import and export refer to the entire EU. Therefore, the economic indicators used from the PRODCOM database were: PRODQNT and PRODVAL, which describe production with mass-related units and in euro, respectively; IMPQNT and IMPVAL, which describe import with mass-related units and in euro, respectively; EXPQNT and EXPVAL, which describe export with mass-related units and in euro, respectively.

³⁰ The 27 Member States are: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.

389 **Table 5** reports the result of a literature review focusing on specific subgroups of the textile and footwear
 390 product group, or textiles in general. For the home/interior textiles, footwear and technical textiles subgroups
 391 only a few articles were found, showing the very limited attention paid by the scientific community to these
 392 subgroups. Most of the literature focuses on textile apparel and textiles in general.

393 **Table 5.** Literature studies investigating environmental impacts of textile products

Granularity of textile products in the literature	Reports and scientific papers	Number of studies
Textile apparel	Cai and Choi (2020) reviewed 108 studies; Munasinghe et al. (2021) reviewed 57 studies.	108
Home/interior textiles	Kalliala and Nousiainen (1999).	1
Footwear	Gottfridsson and Zhang (2015); Quantis (2018); Jadhav and Jadhav (2020); Muthu (2020); Van Rensburg et al. (2020).	5
Technical textiles	Shishoo (1994); Sohail and Sun (2019); Aldalbahi et al. (2021).	3
Textiles in general	Amicarelli et al. (2022) reviewed 54 studies; Luo et al. (2023a) reviewed 107 studies.	107

394 *Source: own analysis*

395 In 2022, the European Environment Agency published a study analysing the environmental impacts of textile
 396 apparel, home/interior textiles and footwear (EEA, 2022b). **Table 6** reports an overview of the environmental
 397 impacts related to the upstream supply chain of textile apparel, home/interior textiles and footwear. Most of
 398 the impacts generated by the subgroups investigated occur outside the EU and are due to textile apparel
 399 production. The contributions of footwear and home/interior textiles are very similar to each other.

400 **Table 6.** Environmental impacts related to the supply chain of textile products

Environmental aspect	Amount	Attribution of impacts (%)		Attribution to specific subgroup (%)		
		Inside EU	Outside EU	Apparel textiles	Home/interior textiles	Footwear
Use of primary raw materials	175 m t 391 kg/person	20	80	40	30	30
Water use	5 000 m m ³ 9 m ³ /person	Contribution not relevant	Most of the contribution	40	30	30
Land Use	180 000 km ² 400 m ² /person	8	92	43	23	35
Greenhouse gas emissions	121 m t CO ₂ eq 270 kg CO ₂ eq/person	25	75	50	30	20

401 *Source: EEA (2022)*

402 Huygens et al. (2023) performed an analysis of waste generation along the value chain of textile products
 403 including textile apparel, home/interior textiles and technical textiles. The analysis does not show which product
 404 subgroup generates more waste, but it distinguishes between the generation of post-industrial, pre-consumer
 405 and post-consumer waste. In 2019, the EU-27 generated 12.6 Mt of textile waste; 11% was post-industrial
 406 waste, 3% was pre-consumer waste, and 86% was post-consumer waste (Huygens et al., 2023).

407 The review of the available literature on the environmental impacts caused by textile products showed that
 408 textile apparel is the most impactful and the most investigated subgroup in the textiles and footwear product
 409 group.

410 **3.2 Proposed scope**

411 All products in the scope of the PS should be sufficiently homogeneous in terms of function, material
 412 composition, chemical composition and technologies used. This homogeneity should allow the development of
 413 common ecodesign requirements within the aspects listed in Article 5 of the ESPR, tailoring them to product
 414 subgroups as appropriate.

415 **3.2.1 Products included in the scope**

416 The analysis reported in Section 3.1 revealed that, within the product group textiles and footwear, textile apparel
 417 is the most suitable subgroup to be addressed by the PS because it:

- 418 — has potential improvements already investigated by the literature (Section 3.1.1);
- 419 — has the largest share in the EU market (Section 3.1.2),

420 — produces the largest share of the environmental impacts, based on the available literature (Section
421 3.1.3).

422 **Table 7** reports all textile apparel categories and their description. **Table 59** (Section 10.1.4) reports all
423 PRODCOM codes of products included in the scope of the PS. The identified product categories are aligned with
424 the ongoing work of the PEFCR A&F ⁽⁸⁾. This alignment allows the JRC to use the work performed by the project
425 PEFCR A&F whenever it is appropriate within the frameworks of the ESPR and the EU Ecolabel.

426 **Table 7.** Product categories of textile apparel included in the scope of the preparatory study

ID	Category	Description
01	T-shirts	Garment to cover the upper body to the elbow (e.g. singlets, vests, t-shirts, polo shirts, other short-sleeved shirts)
02	Shirts and blouses	Garment to cover the upper body including the entire arm (e.g. long-sleeved shirts, blouses, base layers)
03	Sweaters and mid-layers	Garment to keep the upper body warm and covered (e.g. pullovers, cardigans, hoodies, jerseys, sweatshirts, sweaters)
04	Jackets and coats	Garments to put on top of a shirt or sweater or to protect from the natural elements (e.g. blazers, suit jackets, overcoats, other light jackets, rain jackets, outdoor winter jackets, parkas, outdoor vests, anoraks)
05	Pants and shorts	Garment to cover the lower body, may protect from the elements (e.g. casual pants, outdoor pants, dress pants, jeans, sports pants, capri pants, shorts)
06	Dresses, skirts and jumpsuits	One-piece garment that covers both the upper and lower body, or the lower body only, other than pants and shorts (e.g. short- and long-sleeved, strapless, wrap, long and short, one-piece suits)
07	Leggings, stockings, tights and socks	Tight garment to cover the legs and/or feet. (e.g. opaque and sheer tights, pantyhose, fishnets, ankle socks, knee socks, low-cut socks)
08	Underwear	Garment worn under clothes, often next to the skin of the upper or lower body (e.g. boxers, briefs, panties, bras, body-shaping suits)
09	Swimwear	Garment worn for water-based or sun-based activities (e.g. bikinis, bathing suits, racing-style swimwear, board shorts)
10	Textile apparel accessories	Hats – Garment to cover the head for warmth or as a fashion item (e.g. caps, flat caps, woollen hats/beanies, fedoras, panamas, bowlers, newsboys, berets); Scarves and ties – Garment worn around the neck for warmth or as a fashion item (e.g. warm and light scarves, buffs, neckerchiefs, headscarves, shawls, bowties); Belts – Flexible band or strap worn around the waist or over the shoulders used to secure or to hold up clothing such as pants (e.g. dress belts, casual belts, buckle belts, tie-up belts, suspenders); Gloves and mittens – Articles of clothing that protect hands and wrists from the elements or as a fashion item. Used in pairs (e.g. fingerless gloves, fashion gloves, outdoor sports gloves, mittens).

427 *Source: own production based on the ongoing work performed within the development of PEFCR A&F.*

428 Technical textile apparel, such as workwear and sportswear are included in the scope of the PS, as long as (1)
429 it is textile apparel (containing at least 80% by weight of textile fibres, as defined above) and (2) they do not
430 belong to the list of excluded products defined in section 3.2.2.

431 Sportswear could be considered technical textiles due to its high performance in terms of thermoregulatory
432 properties ⁽³¹⁾. Besides these thermoregulatory properties, sportswear and leisurewear have the same, or very
433 similar, features that allow these two types of products to be addressed in the same PS with the same ecodesign
434 requirements, which fall in the domain of the aspects listed by Article 5 of the ESPR.

435 Workwear textile apparel not excluded from scope (as per section 3.2.2) ⁽³²⁾ and leisurewear also have same,
436 or very similar, features that allow these two types of products to be addressed in the same PS with the same
437 ecodesign requirements, which fall in the domain of the aspects listed by article 5 of the ESPR.

438 Nevertheless, this approach on workwear and sportswear will be reassessed when the PS addresses task 6 of
439 the MEErP on ecodesign options.

³¹ The textile industry certifies or reports the performance of sportswear following the guidelines contained in the technical report PD CEN/TR 16422:2012, available at [this link](#). Last accessed on 5 February 2024. These guidelines establish an evaluation system with three levels of performance related to thermoregulatory properties: (a) thermal insulation, (b) water vapour transmission (breathability), (c) air permeability, (d) water penetration resistance and repellence, and (e) liquid sweat management.

³² Examples of workwear textile apparel included in the scope are uniforms used in hospitals, hotels and restaurants.

440 3.2.2 Products excluded from the scope

441 The following textile apparel are excluded from the scope because they are very different to products included
442 in the scope in terms of their function and physical characteristics:

- 443 • **smart textiles** ⁽³³⁾, which are textiles able to sense and react to environmental conditions
444 and external stimuli (e.g. mechanical, thermal, and chemical stimuli) thanks to a number of
445 sensors incorporated in the textiles;
- 446 • **electronic textiles** or **e-textiles** ⁽³³⁾, which are textile-based systems that exhibit an
447 intended and exploitable response as a reaction either to changes in their
448 surroundings/environment or to an external signal/input ⁽³⁴⁾;
- 449 • **textile apparel identified as personal protective equipment (PPE)** in accordance with
450 Regulation (EU) 2016/425 ⁽³⁵⁾;
- 451 • **textile apparel identified as medical devices or as an accessory for a medical device**
452 in accordance with Regulation (EU) 2017/745 ⁽³⁶⁾;
- 453 • **textile apparel identified as toys** in accordance with the Directive 2009/48/EC ⁽³⁷⁾.

454 E-textiles are excluded from the scope of the PS, however all products included in the scope will be able to use
455 information carriers based on technologies such as Ultra High Frequency (UHF), Radio-frequency identification
456 (RFID) and Near-Field Communication (NFC).

457 Additionally, all **intermediate products**, such as fabrics, yarns, fibres, etc., are excluded from the scope of the
458 PS, because their characteristics should be strictly related to the function of the specific textile apparel they are
459 part of. For example, a cotton fabric should have different characteristics when used as a t-shirt component to
460 when used as a table cloth. Exclusion of intermediate textile products from the scope of this PS does not exclude
461 the possibility to set specific requirements and parameters on the intermediate textile product once incorporated
462 in the selected products in the scope. This means that all intermediate textile products, which are part of textile
463 apparel in the scope, are indirectly addressed by the PS.

464 Aspects related to customised textile apparel and upcycled textile apparel ⁽³⁸⁾ will be addressed in the impact
465 assessment that will follow the PS in the policy-making process.

466 In accordance with Article 5(2) of the ESPR, the initial questionnaire ⁽¹²⁾ investigated the possibility to include in
467 the scope further textile products, such as bed linen, kitchen textiles, towels and bathrobes, textile cleaning
468 products, reusable textile hygiene products. The very different functions of these textile products ⁽³⁹⁾ compared
469 to textile apparel does not allow the extension of the scope of the PS, because they cannot be considered similar
470 to apparel. A product category with a different function to textile apparel requires a specific study which includes

³³ Definition of smart textiles is inspired by ISO/TR 23383:2020. Textiles and textile products — Smart (Intelligent) textiles — Definitions, categorisation, applications and standardization needs. Available at [this link](#). Last accessed on 5 February 2024.

³⁴ Textile apparel containing batteries to produce lights and/or sounds are excluded from the scope of this preparatory study.

³⁵ Personal protective equipment (PPE) Regulation. REGULATION (EU) 2016/425 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 9 March 2016 on personal protective equipment and repealing Council Directive 89/686/EEC. Available at [this link](#).

³⁶ Medical devices Regulation. Regulation (EU) 2017/745 of the European Parliament and of the Council of 5 April 2017 on medical devices, amending Directive 2001/83/EC, Regulation (EC) No 178/2002 and Regulation (EC) No 1223/2009 and repealing Council Directives 90/385/EEC and 93/42/EEC. Available at [this link](#).

³⁷ Toy Safety Directive (TSD). Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys. Available at [this link](#).

³⁸ Upcycled textiles meant here as textile products manufactured by making use of used and/or waste components of other textile products.

³⁹ *Bed linens* (bed sheets, pillowcases, duvet/blanket cover) have the function to cover the human body during sleep, and they have a decorative function for the bed.

Kitchen textiles (tablecloths, kitchen tea towels, napkins, aprons) have the function of protecting the surfaces they cover and have a decorative function for an interior environment.

Towels and bathrobes have the function of drying the body or parts of the body after they have become wet (e.g. after washing, swimming, etc.).

Textile cleaning products (floor cloths, dishcloths, dusters and similar cleaning cloths) have the function to remove dust and dirt from surfaces, interacting with detergents and other cleaning chemicals.

Reusable textile absorbent hygiene products have the function of handling fluids, delivering protective properties like absorption, protecting the environment from unintentionally released body waste. In particular, reusable baby diapers must be flexible, so that they are comfortable and adaptable to changing body size.

471 the investigation of the user behaviour, the testing methods to check the performance of the products, and
472 consequently a different approach when establishing ecodesign requirements. Additionally, a different function
473 of the textile product affects the fate of its end-of-life. For example, during their use phase, textile cleaning
474 products interact with many chemicals that are absorbed and could hinder the recycling processes. These
475 aspects deserve to be addressed by a specific study different to this PS. In particular, due to their functions and
476 technical characteristics, textile cleaning products and reusable textile absorbent hygiene products are
477 considered technical textiles.

478 **3.3 Composition, life-cycle stages and main negative environmental impacts of** 479 **products included in the scope**

480 This section provides a literature review concerning the main characteristics of the textile industry in terms of
481 composition and life-cycle stages (Section 3.3.1), and the main factors influencing the negative environmental
482 impacts (Section 3.3.2). Implicitly, this section refers to textile apparel, which represent a major part of the
483 textile industry production, import, export and apparent consumption (**Table 4**). An overview of the life-cycle
484 stages of textile apparel and the main factors affecting the environmental impacts are essential bases to fully
485 understand numerous topics addressed in the following sections. The main environmental impacts are crucial
486 to understand the environmental areas addressed by environmental labels described in Section 4.5. Meanwhile,
487 the description of the life-cycle stages is very important to put in context specific concepts addressed in the
488 market analysis (Section 5), notably (1) manufacturing stages spread over different countries, (2) the main
489 elements affecting apparel manufacture, (3) the characteristics of the value chain, and (4) global
490 competitiveness related to costs of environmental compliancy.

491 The description reported in this section is further detailed in Section 9 and the following milestone, when the
492 PS addresses 5 of the MEErP.

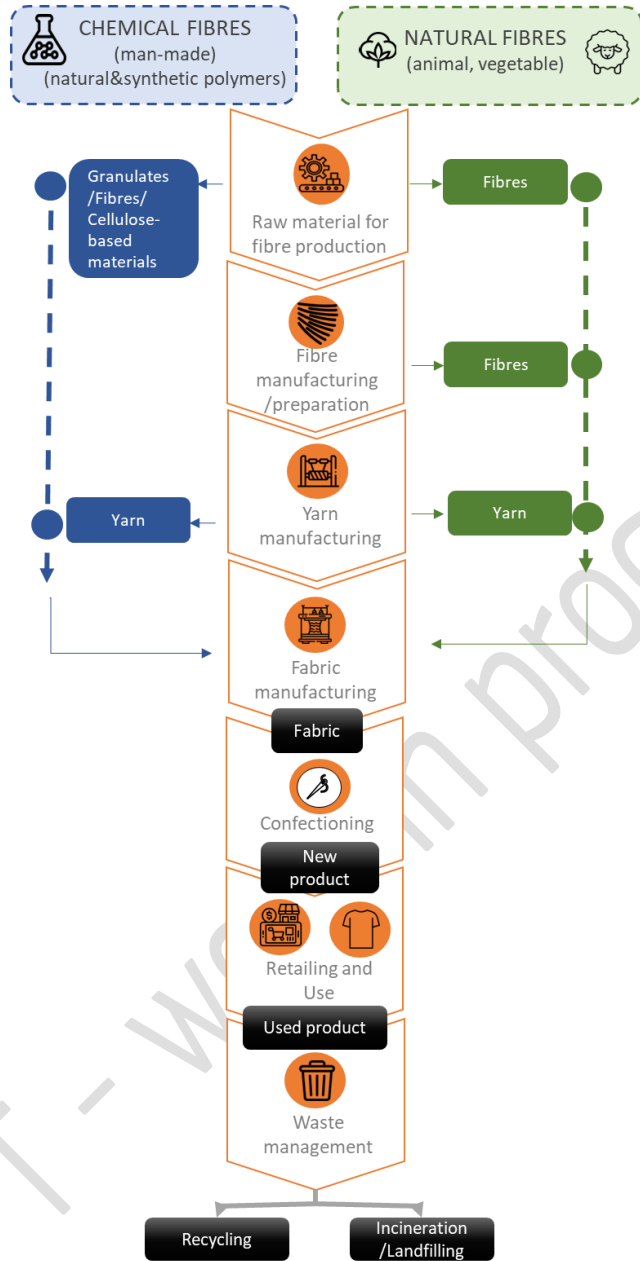
493 **3.3.1 Composition and life-cycle stages**

494 The textile products included in the scope of the PS are mostly made of textile fibres – at least 80% by weight.
495 The Textile Labelling Regulation 1007/2011 lists 50 different types of fibres, but not all of them are commonly
496 used for manufacturing textile apparel (e.g. carbon, ceramic, glass, and metal fibres). Textile fibres most
497 commonly used by the textile apparel industry were classified in the BREF on textiles (Roth et al., 2023) as
498 follows:

- 499 • Natural origin fibres:
 - 500 ○ animal origin, including wool, silk and hair;
 - 501 ○ vegetable origin, including cotton, flax and jute.
- 502 • Chemical fibres (man-made):
 - 503 ○ natural polymer fibres / man-made cellulosic fibres (MMCF), including viscose, cupro,
504 lyocell, acetate, triacetate;
 - 505 ○ synthetic polymer fibres, specifically organic polymers, including polyester (PES),
506 polyamide (PA), acrylic (PAC), polypropylene (PP), elastane (EL).

507 Despite the fact that textile apparel is produced with specific fibres and fibre combinations, technologies and
508 resources, the life cycle of textile apparel can be described by eight distinct stages: (1) raw material for fibre
509 production, (2) fibre manufacturing/preparation, (3) yarn manufacturing, (4) fabric manufacturing, (5)
510 confectioning (often called 'Cut, Make-up and Trim' (CMT)), (6) retailing, (7) use, and (8) waste management.
511 **Figure 1** shows these stages in a linear model that does not mark recycling routes, and it depicts some
512 peculiarities of chemical and natural fibres. **Table 8** reports processes, technologies and resources used at each
513 life-cycle stage of textile apparel. Section 10.2 provides more details.

Figure 1. Main textile life-cycle stages



515

516

Source: own production adapted from McKinsey & Company (2022), icons from www.flaticon.com

517

Table 8. Life-cycle stages of textile apparel – processes, techniques and resources

Stage	Input	Process and techniques	Main resources	Output
(1) Raw material for fibre production	Fibres from crops is used for vegetable origin fibres	Cultivation with subsequent processing.	Land Water Agrochemicals	Staple fibre
	Animals and insects are used for animal-based fibres	Animal farming with shearing and sericulture with silk extraction. Pre-treatments are needed.		
	Cellulose mainly from wood is used for man-made chemical fibres using natural polymers	Dissolving pulp from various sources is dissolved with chemicals and further processed.	Energy Chemicals Land Fossil fuels	Staple fibre, Filament fibres, Granulates

Stage	Input	Process and techniques	Main resources	Output
	Petroleum-based material is used for man-made chemical fibres using synthetic polymers	Specific chemicals and processes are used to produce specific polymers.		
(2) Fibre preparation / manufacturing	Natural staple fibre	Preparation stage usually includes scouring and/or cleaning processes before carding. The processes vary according to the natural fibre.	Energy Water Chemicals	Carded natural fibres
	Staple fibre bale of MMCF	Opening, carding, drawing and additional specific processes according to the spinning technology used.	Energy	Carded MMCF
	Chemical granulates	No process required.	None	Granulates
(3) Yarn manufacturing	Carded natural fibres	Ring spinning and open-end spinning .	Energy Water Chemicals	Yarns
	Carded MMCF	Ring spinning, air-jet spinning, wet spinning and open-end spinning.		
	Polymers in solution or as granulates (for chemical fibres)	Wet or dry spinning from a solution and melt spinning from granulates		
(4) Fabric manufacturing	Yarn (for weaving and knitting) Fibres and filaments (for non-woven)	A two-dimensional structure is created by interlacing yarns. Weaving is the predominant fabric manufacturing technique. It involves interlacing two sets of yarns at right angles on a loom.	Energy	Fabrics
		Knitting is the second most used fabric manufacturing method. Yarns are interlooped using needles to form fabric on knitting machines.		
		Non-woven technology produces textile structures by bonding fibres or filaments together, either mechanically, thermally, or chemically.		
Finishing processes	Yarn and/or Fabric	Numerous wet treatments for sizing, desizing, pre-treatment, dyeing, printing, finishing, coating, laminating, and many more. These treatments are applied based on the specific requirements of the final products, and are not applied sequentially. Each treatment utilises specific technologies and chemicals.	Chemicals Energy Water (dyeing)	Finished yarn, Finished fabric
(5) Confectioning	Fabric Non textile components	Product design, fabric spreading and cutting, product assembly, sewing and ironing.	Energy Manual labour	Textile apparel
(6) Retailing	Textile apparel	Transportation and sale via numerous channels, such as shops, on the internet.	Fuel (transport) Energy Manual labour	Textile apparel owned by the user
(7) Use	Textile apparel owned by the user	Washing, cleaning, drying, ironing, as well as wear and tear.	Water Energy Chemicals	Used textile apparel
(8) Waste management	Used textile apparel	Used textile apparel are usually incinerated and landfilled. However, circular solutions are also possible, such as: textile apparel reuse, fabric recycling, fibre recycling (mechanical process), raw material recycling (chemical process).	Specific to the fate of the used product	Specific to the fate of the used product

519 **3.3.2 Main factors influencing the negative environmental impacts**

520 This section aims to provide a general overview about the factors that negatively affect the environment due
521 to the consumption of textile apparel, or textiles in general. This is done via a literature review to provide some
522 background useful for the understanding of the environmental areas addressed by environmental labels
523 described in Section 4.5. A complete environmental assessment will be performed in Task 5 and reported in the
524 following milestone.

525 The textile production processes are characterised by a large use of resources and numerous emissions into
526 water bodies and into the atmosphere. The European Environment Agency estimated that the textile industry is
527 the fifth industrial sector for primary use of materials and greenhouse gas emissions, and the third industrial
528 sector for water and land use (EEA, 2022b).

529 **Use of land**

530 The European Environment Agency estimated that in 2020 the purchase of apparel by European households
531 used about 77 400 km² of land (EEA, 2022b). About 92% of this land is located outside Europe, and it is mainly
532 used for cultivation of cotton in China and India (Manshoven et al., 2019). The grazing of sheep and cashmere
533 goats for the production of animal fibres such as wool require also use of land. In this case the attribution of
534 environmental impacts to the fibre should take into account that the same animals are used to produce meat,
535 milk and leather. The United Nation Environment Program estimates that the use of land in cellulose supply for
536 the production of MMCF and the production of synthetic fibres is smaller than what is requested by natural
537 fibres (UNEP, 2020).

538 In general, use of land and land use change are relevant because they influence biodiversity and the emission
539 of greenhouse gases (Newbold et al., 2016; IPCC, 2023).

540 **Use and discharge into water**

541 The textile industry's water consumption is estimated to account for 4% of global freshwater extraction (Ellen
542 MacArthur Foundation, 2017). The European Environment Agency reported that the production of clothing,
543 footwear and household textiles purchased in the EU in 2020 was equal to 4 000 million m³ of blue water⁽⁴⁰⁾,
544 meaning about 9 m³ per person (EEA, 2022b). Water is mainly used in numerous stages of the entire life cycle
545 of textile apparel (**Table 8**). The BREF for the EU textile industry sets ambitious thresholds for emissions into
546 water due to their highly negative effects. Numerous parameters are considered including carbon-load-related
547 parameters (chemical oxygen demand (COD), biological oxygen demand (BOD), total organic carbon (TOC)),
548 suspended solids, nitrogen and phosphorus compounds, metals, adsorbable organic halides (AOX), pesticide,
549 flame retardants and many more. Use of dyes generates highly polluted wastewater, which needs to be properly
550 treated before its release into the environment. Also, other processes like production of polyester fibres and the
551 treatment of knitted fabrics generate wastewater with a high load of heavy metals, such as antimony, and with
552 a high hydrocarbon oil index (HOI), respectively (Roth et al., 2023). Additionally, when treating natural fibres, a
553 series of substances, such as biocides, are released into the wastewater even before pre-treating the fibres
554 (Zhang et al., 2022; Roth et al., 2023).

555 **Use of chemicals**

556 Numerous life-cycle stages of textile apparel involve the use of chemical substances and mixtures (hereafter
557 called 'chemicals') (**Table 8**). Some of them are pesticides, solvents, surfactants, dyes and pigments, water and
558 stain repellents, flame retardants, biocides and many more (Ellen MacArthur Foundation, 2017). Some of these
559 chemicals are directly in contact with soil and water bodies, like during the cultivation of natural fibres using
560 fertilisers and pesticides. Other chemicals are usually dissolved and released in the wastewater produced in
561 several processes (Zhang et al., 2022; Roth et al., 2023).

562 Humans are also directly exposed to chemicals used in textile apparel. Farmers and factory workers face
563 exposure to these chemicals, and people wearing textile products are potentially at risk due to chemicals that
564 remain bound to the products placed on the market (Ellen MacArthur Foundation, 2017). **Use of energy**

565 Almost all life-cycle stages of the textile apparel have a significant energy consumption (**Table 8**). In particular,
566 some processes are highly energy-demanding, like the extraction of raw materials, specifically in the cases of

⁽⁴⁰⁾ 'Blue' water is reported as 'surface water or groundwater that is consumed or evaporated during irrigation, industry processes or household use' in (EEA, 2022b).

567 fibres like silk or synthetic fibres, and production processes such as spinning, knitting, and weaving. Furthermore,
568 thermal treatments are crucial during production, as well as in the use phase for washing, ironing and drying
569 (Niinimäki et al., 2020; Munasinghe et al., 2021).

570 **Generation of waste**

571 In 2019, the EU generated about 12.6 Mt of textile waste, including post-industrial, pre-consumer and post-
572 consumer waste, representing 11%, 3% and 86% of the total, respectively. Nevertheless, regarding waste
573 generation, it is not possible to distinguish the impact of textile apparel from other textile products (Huygens et
574 al., 2023).

575 Huygens et al. (2023) estimated that, in 2019, about 90% of post-industrial and pre-consumer waste was
576 incinerated and landfilled, and about 10% was recycled. Additionally, in the same year, about 8.5 Mt of post-
577 consumer waste was not separately collected and was sent to incinerators or landfilled. The majority of post-
578 consumer waste that is separately collected is sent outside the EU as 'used product', producing negative
579 environmental and social impacts (Lingås et al., 2023; Huygens et al., 2023).

580 The landfilling and incineration of waste generates pollution, especially if it is not well controlled (Christensen,
581 2010). The Ellen MacArthur Foundation estimates that about 2 000 tonnes of hazardous substances annually
582 are released in the EU due to degradation of textiles in landfills (Ellen MacArthur Foundation, 2017).

583 **Emissions into the atmosphere**

584 The apparel industry is responsible for about 6.5% of global greenhouse gas emissions. This mainly depends
585 on the use of energy and the sources employed for its production (Niinimäki et al., 2020). The European
586 Environment Agency estimated that textile consumption in the EU in 2020 emitted 121 million tonnes of
587 greenhouse gases. Around 75% of the emissions occurred outside Europe, specifically in Asian countries (EEA,
588 2022b).

589 The BREF for the EU textile industry sets ambitious thresholds for emissions into the atmosphere due to their
590 highly negative effects. Numerous parameters are considered including volatile organic compounds,
591 formaldehyde, oil mist, dust, ammonia, carbon monoxide, sulphur oxides and many more (Roth et al., 2023).
592 These compounds are generated in processes associated with thermal treatments, wet processes (coating,
593 laminating and other finishing), and the use of agents and carriers in the production phase (Roth et al., 2023).

594 **Pollution originated from textile fragmentation**

595 Due to the publication of recent studies highlighting the adverse environmental and health impacts of
596 microplastics, the release of synthetic fragmented fibres from textile products is under the spotlight (Amobonye
597 et al., 2021; Leslie et al., 2022). One of the leading sources of microplastics pollution is the fragmentation of
598 synthetic textiles (Boucher and Friot, 2017). Fibres are released throughout the textile value chain, from the
599 production phase to the end-of-use phase. During the manufacturing stages, microplastics are released into
600 the atmosphere and into the wastewater produced. Household laundering during the use phase is another
601 leading source of microplastics release into wastewater. During the end-of-use phase, landfilling, incineration
602 and recycling are believed to be an important source of airborne and terrestrial microplastics (UNEP, 2020).
603 Estimations of microplastics releases exhibit considerable uncertainty, with annual figures for the EU oscillating
604 between 1 649 tonnes and 61 078 tonnes (DG ENV, 2023). This uncertainty is primarily attributable to the
605 scarce data available regarding the production and use phases of the microplastics life cycle, and a complete
606 lack of information for the disposal stage. The imprecision comes from the challenge of quantifying
607 microplastics emissions, rather than any issues with the underlying assumptions of the baseline projection (DG
608 ENV, 2023). Current patterns indicate that emissions of microplastics from textiles are projected to rise by
609 approximately 22% by the year 2030 (DG ENV, 2023).

610 Once released into the environment, microplastics can be ingested by organisms, leading to problems due to
611 physical and chemical properties of the microplastics. Their small size and persistence make them difficult to
612 remove from the environment, and they can act as vectors for other pollutants, including persistent organic
613 pollutants (POPs) that can adhere to their surfaces (Xiang et al., 2022). The ubiquity of microplastics has
614 prompted global concern, necessitating research into their environmental distribution, fate, and long-term
615 implications.

616 Despite the biodegradability of natural fragmented fibres, their potential risk is still under evaluation, because
617 their release could be associated with harmful substances (UNEP, 2020). The release of natural fragmented
618 fibres is an emerging environmental concern that parallels the issues posed by synthetic fragmented fibres
619 (microplastics). Although natural fragmented fibres are biodegradable, their extensive release into aquatic

620 systems may still result in ecological disruption. (Athey and Erdle, 2021; Zambrano et al., 2021) The concern is
621 that, similar to synthetic fragmented fibres, they can transport hazardous substances, introduce invasive species
622 via attachment, and affect the feeding behaviour within food webs. Additionally, understanding the full
623 environmental impact of natural fragmented fibres, including their degradation rates and interactions with
624 aquatic life, remains a critical area to be explored.

625 **Table 9** provides an overview of important negative environmental impacts in the value chain of textile apparel
626 based on available literature:

- 627 — Climate impacts are mainly generated during the processes of bleaching / dyeing and finishing.
- 628 — Fresh water is mainly affected during the use phase, the processes of bleaching / dyeing and
629 finishing, and in raw material production.
- 630 — The impacts on land use are mainly generated during the raw material production.
- 631 — Impacts on both ecosystem quality and human health are mainly generated in raw material
632 production, the processes of bleaching / dyeing and finishing, and during the use phase.

633

DRAFT - work in progress

634 **Table 9** Negative environmental impacts across the global apparel value chain

Phase	Process	Climate (% in the value chain)	Water resources (% in the value chain)		Land use (% in the value chain)	Ecosystem quality (main factors)	Human health (main factors)
			Freshwater use	Water scarcity footprint			
Fibre production	Raw material production	12	21	33	56	Habitat loss when using land, Water use, Soil degradation, Agrochemicals use	Emission of harmful substances
	Material processing & sourcing	NA	NA	NA	NA	NA	NA
	Fibre preparation	NA	NA	NA	NA	NA	NA
Yarn and fabric production	Yarn preparation (spinning)	12	7	21	6	NA	NA
	Weaving, knitting, bonding	10	7	16	4	NA	NA
Textile production	Bleaching / dyeing and finishing	36	24	10	10	Chemicals released in fresh waters, High use of energy based on fossil fuels	Emission of harmful substances and due to the extraction and burning of fossil fuels
	Assembly	5	5	2	12	NA	NA
Consumption	Distribution and retail	1-11	< 1	< 1	< 1	NA	NA
	Use	14-24	35	18	13	High electricity consumption	Hazardous chemicals retained in the textile apparel
End-of-life	Collection and sorting	< 1	< 1	NA	< 1	NA	NA
	Landfilling / waste to energy	< 1	NA	NA	NA	NA	NA

635 NA: Not Available

636 Breakdown of phases is aligned with the analysis reported by [UNEP \(2020\)](#).

637 Source: own elaboration based on (Ellen MacArthur Foundation, 2017; Niinimäki et al, 2020; UNEP, 2020).

638

639 **4 Legislation, strategies and voluntary environmental labels relevant for** 640 **the textile sector**

641 The sound development of the PS includes a good understanding of the EU legislation (existing and in
642 preparation) and legislation from outside EU. This will allow the proposed ecodesign requirements to establish
643 synergies with other legislation and strategies at EU and global level. For this reason, this section analyses the
644 textile legislative context at different levels: EU, Member State, and third country (Sections 4.1 and 4.2). Textile
645 strategies promoted by the United Nations are addressed in Section 4.3.

646 The textile industry currently uses numerous standards to measure and identify numerous technical
647 aspects/parameters of a textile product. Section 4.4 analyses and classifies many standards used by the textile
648 industry because they could potentially be used to propose and/or verify ecodesign requirements, when the PS
649 addresses tasks 6 and 7 of the MEErP.

650 Finally, Section 4.5 provides an overview of the voluntary environmental labels used in the textile sector. This
651 analysis focuses on the type and the environmental aspects mostly addressed by these labels. This investigation
652 is mainly important for the following points:

- 653 • the background for the revision process of the EU Ecolabel criteria for textile products (see
654 Section 1);
- 655 • the identification of the most recognised negative environmental impacts of the textile
656 industry;
- 657 • the identification of requirement areas, which could inspire future requirements;
- 658 • the analysis of possible information on environmental labels to potentially be reported in the
659 Digital Product Passport.

660 **4.1 EU legislation**

661 Currently the EU has no specific legislation addressing the mandatory sustainability of textiles. As mentioned
662 in Section 1, there are the current EU Ecolabel criteria for textile products⁽⁴¹⁾, which belong to a voluntary
663 scheme for companies willing to show the good environmental performance of their products. Additionally, a
664 number of EU legal acts have a direct impact on the placing on the market of textile products. Furthermore,
665 profound changes in the EU acquis in the areas of consumer protection, consumer rights and product policy
666 were, at the time of drafting this study, at different stages of the ordinary legislative procedure. In addition, a
667 number of important policy documents, adopted by the Commission following the European Green Deal
668 Communication, and mentioned in Section 1, address the relevance of textiles as a key product group. This
669 section outlines the most relevant acts, existing and in preparation, related to textile products.

670 **4.1.1 Existing EU legislation**

671 **Textile Labelling Regulation (TLR)⁽¹⁴⁾**

672 The TLR applies to textile products and products with textile components made up of at least 80% by weight of
673 textile fibres. It defines rules on:

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

678 The Regulation, which is currently under revision, aims to improve the functioning of the internal market and
679 provide accurate information to consumers. It sets out a framework on how the textile composition is to be
680 declared and how fibre composition should be determined. The introduction of rules on labelling domains such

⁴¹ EU Ecolabel criteria for textile products. Commission Decision of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products. Commission Decision (2014/350/EU). Available at [this link](#).

681 as sustainability and circularity, care, origin, size and presence of allergenic substances is currently under
682 consideration, with a view to proposing a fundamental revision of the Regulation soon.

683

684 **Industrial and Livestock Rearing Emission Directive**

685 The Industrial and Livestock Rearing Emissions Directive (IED 2.0)⁽⁴²⁾ is the main EU instrument regulating
686 pollutant emissions from industrial installations and intensive livestock farms (pig and poultry). Industrial
687 activities listed in Annex I to the Directive are required to operate in accordance with a permit based on the
688 principles and provisions of the Directive. The IED 2.0 is based on several pillars, in particular an integrated
689 approach, the use of best available techniques and public participation.

690 The integrated approach means that permits must take the whole environmental performance of the plant into
691 account. This covers emissions to air, water and land, generation of waste, use of raw materials, energy
692 efficiency, noise, prevention of accidents, and restoration of the site upon closure.

693 The permit conditions including emission limit values must be based on the Best Available Techniques (BAT). In
694 order to define BAT and the BAT-associated environmental performance at EU level, the Commission organises
695 an exchange of information with experts from Member States, industry and environmental organisations. This
696 process results in BAT Reference Documents (BREFs)⁽⁴³⁾; the BAT conclusions contained in the BREFs are
697 adopted by the Commission as Implementing Decisions. The IED 2.0 requires that these BAT conclusions are
698 the reference for setting permit conditions.

699 The IED 2.0 ensures that the public has a right to participate in the decision-making process, and to be informed
700 of its consequences, by having access to permit applications, permits and the results of the monitoring of
701 releases. Through the European Industrial Emissions Portal (EIEP), established by Regulation (EU)
702 2024/1244⁽⁴⁴⁾, environmental data reported by Member States, and some other countries⁽⁴⁵⁾, are made
703 accessible in a public register⁽⁴⁶⁾.

704 The IED 2.0 and the EIEP Regulation focus on emissions into air, water and land, prevention of waste generation,
705 energy, water and material efficiency and reuse, in addition to promoting the use of safer, less toxic or non-
706 toxic chemicals in industrial processes. They:

- 707 — ensure full and consistent implementation of the IED 2.0 across Member States, with tighter permit
708 controls on air and water emissions;
- 709 — increase investment in new, cleaner technologies taking into account energy use, resource
710 efficiency and water reuse whilst avoiding lock-in to obsolete technologies;
- 711 — support more sustainable growth of sectors that are key to building a clean, low-carbon and
712 circular economy;
- 713 — cover intensive farming and industrial activities, ensuring that sectors with significant potential for
714 high resource use or pollution also curb environmental damage at source by applying Best
715 Available Techniques;
- 716 — establish an Innovation Centre for Industrial Transformation and Emissions (INCITE)⁽⁴⁷⁾;
- 717 — integrate the previously separate requirements for depollution and decarbonisation so that future
718 pollution control investments take better account of greenhouse gas emissions, resource efficiency
719 and water reuse;

⁴² Industrial Emissions Directive 2.0. Directive 2010/75/EU on industrial and livestock rearing emissions (integrated pollution prevention and control). Available at [this link](#).

⁴³ Best Available Techniques Reference Documents (BREFs), which are available at [this link](#). Last visited on 12 September 2024.

⁴⁴ EIEP Regulation (EC) No 2024/1244 on reporting of environmental data from industrial installations, establishing an Industrial Emissions Portal. Available at [this link](#).

⁴⁵ Iceland, Liechtenstein, Norway, Serbia, Switzerland and the United Kingdom.

⁴⁶ European Industrial Emissions Portal. Available at [this link](#). Last visited on 12 September 2024.

⁴⁷ The European Innovation Centre for Industrial Transformation and Emissions (INCITE). Available at [this link](#). Last visited on 12 September 2024.

720 — enhance data transparency and public access to environmental information by making permit
721 summaries available online and providing more opportunities for public participation in the setting
722 and review of permits.

723 The currently valid BREF for the textile industry dates back to 2023 (Roth et al., 2023). The associated Best
724 Available Techniques (BAT) conclusions were adopted as Commission Implementing Decision (EU)
725 2022/2508⁽⁴⁸⁾. However, the industry belonging to the value chain of textile apparel could find relevant other
726 BAT conclusions, such as Commission Implementing Decision (EU) 2019/2010⁽⁴⁹⁾ and Commission
727 Implementing Decision (EU) 2018/1147⁽⁵⁰⁾, which are based on the corresponding BREFs dealing with waste
728 incineration and waste treatments (Pinasseau et al., 2018a; Neuwahl et al., 2019).

729

730 **REACH Regulation**⁽⁵¹⁾

731 The Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) has the main
732 purpose of ensuring the safe use of chemicals in the EU. More specifically, REACH aims to ensure a high level
733 of protection of human health and the environment from risks resulting from the intrinsic properties of chemical
734 substances, as well as the free circulation of substances on the internal market, while enhancing
735 competitiveness and innovation. REACH regulates, amongst many other aspects, the restriction of the placing
736 on the market and use of certain substances listed in its Annex XVII, including in some cases, the incorporation
737 of substances into articles. Consequently, restrictions also cover recycled substances and the presence of
738 restricted substances in recovered materials. The authorisation title of REACH applies to the placing on the
739 market and use of substances of very high concern (SVHC), aiming at their progressive substitution by less
740 hazardous substances or technologies and by subjecting their use to specific conditions.

741 A number of restrictions in Annex XVII to REACH specifically mention textiles in their scope. These include entries:
742 4 - Tris (2,3 dibromopropyl) phosphate; 7 - Tris(aziridinyl)phosphin oxide; 8 - Polybrominated biphenyls; 18 -
743 Mercury compounds; 20 - Organostannic compounds; 43 - Azocolourants and Azodyes; 46/46a - Nonylphenol
744 and Nonylphenol ethoxylates; 47 - Chromium VI compounds (relevant to leather articles); 68 - C9-C14 PFCAs
745 and 72 - CMRs in textiles and footwear. Other restrictions, of general application to articles placed on the market
746 for supply to the general public, or covering all articles placed on the market, may also apply to textile articles,
747 for instance entries 50 - (certain) polycyclic aromatic hydrocarbons; 51 and 52 (certain phthalates); 61 -
748 Dimethylfumarate; and 63 - Lead and its compounds.

749 In addition, Article 33 of REACH sets up a supply chain communication duty requiring suppliers of articles
750 containing SVHC above 0.1% to communicate certain information to the recipients of those articles.

751

752 **Regulation on the classification, labelling and packaging of substances and mixtures (CLP)**⁽⁵²⁾

753 Regulation (EC) No. 1272/2008 (CLP) focuses on the identification and classification of the intrinsic hazards of
754 chemicals, i.e. the hazardous effects of chemicals on human health or the environment, and on communicating
755 them to users of chemicals and decision makers (consumers, industry and authorities). Identifying the intrinsic
756 hazardous properties of substances to derive a hazard classification is the first step in assessing chemical risks.

⁴⁸ BREF for the textile industry. Commission Implementing Decision (EU) 2022/2508 of 9 December 2022 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions, for the textiles industry. Available at [this link](#).

⁴⁹ BREF for waste incineration. Commission Implementing Decision (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration. Available at [this link](#).

⁵⁰ BREF for waste treatment. Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council. Available at [this link](#).

⁵¹ REACH Regulation. Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC. Available at [this link](#).

⁵² CLP Regulation. Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. Available at [this link](#).

757 CLP requires manufacturers, importers and downstream users to classify hazardous substances and mixtures
758 and provides rules on how to classify them, applicable throughout the EU. For a substance that has a harmonised
759 classification (an entry in Annex VI to CLP), that classification is legally binding for the hazard classes and
760 differentiations covered in the entry. The substances not covered in the entry, as well as mixtures, must be
761 evaluated and self-classified. The hazard classification determines the appropriate labelling and packaging of
762 the chemicals in the supply chain, in particular to protect workers, consumers and the environment.

763 Hazard classifications under CLP, including the new hazard classes defined in the recently adopted Delegated
764 Commission Regulation (EU) 2023/707, are very relevant in determining obligations imposed by many relevant
765 EU acts, including on products. Article 2(28) of ESPR refers to specific hazard classes under Annex VI of CLP to
766 define “substances of concern”, whereas under Regulation (EC) No. 66/2010 on the EU Ecolabel, its Article 6(6)
767 specifies that an EU Ecolabel cannot be awarded to goods containing substances or mixtures meeting the
768 criteria for certain hazard classifications in accordance with CLP.

769

770 **POPs Regulation** ⁽⁵³⁾

771 The POPs Regulation focuses on persistent organic pollutants, and it implements the international obligations
772 of the EU as a party to the Stockholm Convention. The objective of the Regulation is to protect human health
773 and the environment from POPs by prohibiting, phasing out as soon as possible, or restricting the manufacturing,
774 placing on the market and use of substances subject to the Stockholm Convention. Substances listed in Annexes
775 I and II to the Regulation are, respectively, prohibited or limited, in terms of their manufacture, placing on the
776 market and use, with some specific exemptions. Some of these restrictions are relevant to textiles, for instance
777 those associated with certain brominated flame retardants (e.g. certain PBDEs), surface-active substances such
778 as PFOS or PFOA, or substances with biocidal properties such as pentachlorophenol.

779

780 **Waste Framework Directive (WFD)** ⁽⁵⁴⁾

781 The WFD sets the basic concepts and definitions related to waste management, including definitions of waste,
782 recycling and recovery. It lays down waste management principles, which contribute to the reduction of the
783 adverse impact of waste management on human health or the environment, with an emphasis on waste
784 prevention. The WFD contains provisions on waste prevention, encouraging the reuse of products and the setting
785 up of systems promoting repair and reuse activities, including in particular for textiles (Article 9), and requires
786 Member States to set up separate collection for textiles by 1 January 2025 (Article 11) in order to promote
787 high-quality recycling. Article 9 of the Directive also promotes the reduction of the content of hazardous
788 substances in materials and products by defining a reporting obligation that applies to suppliers of articles (as
789 defined under REACH), requiring them to provide information regarding the presence of SVHC in articles,
790 including textile articles, pursuant to Article 33 of REACH, to the European Chemicals Agency (ECHA), as of 5
791 January 2021. This information is collected in a database, operated by ECHA, and access is provided to waste
792 treatment operators and consumers.

793

794 **Waste Shipment Regulation (WSR)** ⁽⁵⁵⁾

795 This Regulation aims to (1) ensure that the EU does not export its waste challenges to third countries and
796 contributes to environmentally sound management of waste; (2) strengthen enforcement to prevent illegal
797 shipments of waste occurring within the EU, as well as from the EU to third countries; (3) increase traceability
798 of waste shipments within the EU and facilitate recycling and reuse. Although the WSR entered into force on 20
799 May 2024, most provisions will apply from 21 May 2026 and most export rules will apply from 21 May 2027.

800

⁵³ POPs Regulation. Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (recast) (Text with EEA relevance) Text with EEA relevance. Available at [this link](#).

⁵⁴ Waste Framework Directive (WFD). Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (Text with EEA relevance). Available at [this link](#).

⁵⁵ Waste Shipment Regulation (WSR). Regulation (EU) 2024/1157 of the European Parliament and of the Council of 11 April 2024 on shipments of waste, amending Regulations (EU) No 1257/2013 and (EU) 2020/1056 and repealing Regulation (EC) No 1013/2006. Available at [this link](#).

801 **Corporate Sustainability Due Diligence Directive (CSDDD)** ⁽⁵⁶⁾

802 The primary objective of the CSDDD is to promote sustainable and responsible corporate practices throughout
803 companies' operations and global value chains. The new rules aim to ensure that in-scope companies identify
804 and mitigate adverse human rights and environmental impacts arising from their activities, both within and
805 outside the EU.

806 This Directive establishes a mandatory corporate due diligence obligation, comprising the following key
807 elements:

808 — Companies must identify and address potential and actual human rights and environmental
809 impacts within their own operations, subsidiaries, and value chains, including those of their
810 business partners.

811 — Large companies are required to adopt and implement, to the best of their abilities, a transition
812 plan for climate change mitigation, aligned with the 2050 climate neutrality objective of the Paris
813 Agreement and intermediate targets under the European Climate Law.

814 The CSDDD applies to: (1) large EU limited liability companies and partnerships with more than 1,000 employees
815 and a global turnover exceeding EUR 450 million, and (2) large non-EU companies with a turnover of more than
816 EUR 450 million in the EU. Micro companies and small and medium-sized enterprises (SMEs) are exempt from
817 the proposed rules. However, the Directive provides supportive and protective measures for SMEs that may be
818 indirectly affected as business partners in value chains

819

820 **The Corporate Sustainability Reporting Directive (CSRD)** ⁽⁵⁷⁾

821 The CSRD modernised and strengthened the rules governing the social and environmental information that
822 companies must report. A broad range of large companies, including listed small and SMEs, are required to
823 report on sustainability. Non-EU companies generating over EUR 150 million on the EU market are also subject
824 to reporting requirements.

825 The CSRD aims to provide investors and other stakeholders with access to the necessary information to assess
826 the impact of companies on people and the environment, as well as to evaluate financial risks and opportunities
827 arising from climate change and other sustainability issues. Furthermore, the harmonisation of reporting
828 requirements is expected to reduce reporting costs for companies in the medium to long term.

829 Companies subject to the CSRD will be required to report according to the European Sustainability Reporting
830 Standards (ESRS), drafted by an independent body representing various stakeholders. The first set of ESRS was
831 published in December 2023, in the form of a Delegated Regulation ⁽⁵⁸⁾. These standards apply to all companies
832 within the scope of the CSRD, regardless of their sector of operation. The ESRS are aligned with EU policies,
833 while also building on and contributing to international standardisation initiatives.

834 The CSRD also requires assurance on the sustainability information that companies report and will provide for
835 the digital taxonomy of sustainability information.

836 The first companies will be required to apply the new rules for the 2024 financial year, with reports to be
837 published in 2025.

838

839 **Unfair Commercial Practices Directive (UCPD)** ⁽⁵⁹⁾

⁵⁶ Corporate Sustainability Due Diligence Directive (CSDDD). Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859. Available at [this link](#).

⁵⁷ Corporate Sustainability Reporting Directive (CSRD). Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting. Available at [this link](#).

⁵⁸ Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards. Available at [this link](#).

⁵⁹ Unfair Commercial Practices Directive (UCPD). Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC,

840 The UCPD concerns unfair business-to-consumer commercial practices, and it aims to boost consumer
841 confidence and make it easier for businesses, especially small and medium-sized enterprises, to trade across
842 borders. It regulates unfair commercial practices that occur before, during and after a business-to-consumer
843 transaction has taken place.

844 The Directive does not provide specific rules on environmental claims or specifically for textiles. However, it
845 provides a legal basis to ensure that traders do not present environmental claims in ways that are unfair to
846 consumers. It does not prohibit the use of 'green claims' as long as they are not unfair. On the contrary, the
847 UCPD can help traders invest in the environmental performance of their products by enabling them to
848 communicate these efforts to consumers transparently and by preventing competitors from presenting
849 misleading environmental claims. The Directive states that claims should not be misleading and that all claims
850 which lead a consumer to choose one product over another must be trustworthy. The Directive's Annex I lists
851 which practices are considered unfair and misleading in all circumstances.

852 The proposal from the Commission for a Directive on empowering consumers for the green transition will amend
853 the Unfair Commercial Practices Directive and the Consumer Rights Directive, introducing specific provisions to
854 avoid greenwashing. See further details in Section 4.1.2.

855

856 **Directive on empowering consumers for the green transition** ⁽⁶⁰⁾

857 The proposal from the Commission for a Directive on empowering consumers for the green transition will amend
858 the Unfair Commercial Practices Directive (2005/29/EC) and the Consumer Rights Directive (2011/83/EU). It
859 addresses problems identified with consumer information at the point of sale, in particular the fact that
860 consumers lack reliable information for choosing more environmentally sustainable products, and aims to
861 protect consumers against certain unfair commercial practices.

862 This is to be achieved through the improved participation of consumers in the circular economy by providing
863 better information on the durability and reparability of certain products to consumers and stepping up the
864 protection of consumers against unfair commercial practices by preventing: greenwashing, early obsolescence
865 practices, use of unreliable and non-transparent sustainability labels and information tools. The co-legislator
866 adopted this Directive on 20 February 2024.

867 **4.1.2 EU legislation in preparation**

868 **Proposal for a targeted amendment of the Waste Framework Directive** ⁽⁶¹⁾

869 The overall objective of the WFD revision is to reduce environmental and climate impacts, increase environment
870 quality and improve public health associated with textiles waste management in line with the waste hierarchy.
871 The Commission proposal aims to make producers responsible for the full life cycle of textile products and to
872 support the sustainable management of textile waste across the EU. This initiative also aims to accelerate the
873 development of the separate collection, sorting, reuse and recycling sector for textiles in the EU, in line with the
874 EU Strategy for Sustainable and Circular Textiles.

875 The Commission proposal intends to introduce mandatory and harmonised Extended Producer Responsibility
876 (EPR) schemes for textiles in all EU Member States. According to this Commission proposal, producers will cover
877 the costs of management of textile waste, which will also provide incentives to reduce waste and increase the
878 circularity of textile products, resulting in a better design of products from the start. The proposal envisages
879 that the contribution to EPR schemes will be adjusted based on the environmental performance of textiles (eco-
880 modulation) based on parameters aligned with ecodesign requirements under the ESPR.

881

Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council ('Unfair Commercial Practices Directive') (Text with EEA relevance). Available at [this link](#).

⁶⁰ Proposal for a Directive of the European Parliament and of the Council amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and better information. COM/2022/143 final. Available at [this link](#).

⁶¹ Proposal for a Directive of the European Parliament and of the Council amending Directive 2008/98/EC on waste. COM/2023/420 final. Available at [this link](#).

882 **Proposal for a Directive on substantiation and communication of explicit environmental claims**
883 **(Green Claims Directive)** ⁽⁶²⁾

884 The Commission Green Claims Directive proposal will address greenwashing by tackling false environmental
885 claims made to consumers, and stopping the proliferation of public and private environmental labels. Together
886 with the proposal for a Directive on empowering consumers for the green transition, the proposal establishes a
887 clear regime for environmental claims and labels. Their purpose is to ensure that consumers receive trustworthy
888 information about the environmental credentials of the products they buy.

889 The proposal targets 'green claims' made by businesses that state or imply a positive environmental impact,
890 lesser negative impact, no impact, or improvement over time for their products, services, or organisation. It
891 requires that green claims are substantiated and this substantiation be verified *ex-ante*. This only concerns
892 claims that are not covered by other EU rules, notably the ESPR and the TLR. The proposal also addresses
893 environmental labelling schemes, stopping the proliferation of public and private labels and ensuring the
894 transparency and robustness of labelling schemes.

895

896 **Proposal on common rules promoting the repair of goods** ⁽⁶³⁾

897 The proposal introduces a new 'right to repair' for consumers, both within and beyond the legal guarantee. It
898 aims to provide consumers savings and support the objectives of the European Green Deal by reducing waste.
899 The proposal will make it easier and more cost-effective for consumers to repair as opposed to replace goods.
900 Additionally, it aims to promote the repair sector, incentivising sustainable business models.

901 **4.2 Legislation and initiatives in EU Member States and non-EU countries**

902 The publication of Directive (EU) 2018/851 ⁽⁶⁴⁾ (the 2018 revision of the WFD) promoted the establishment of
903 **Extended Producer Responsibility (EPR)** schemes for textile products in several Member States. For textile,
904 France ⁽⁶⁵⁾, the Netherlands ⁽⁶⁶⁾ and Hungary (Decree 80/2023) were pioneers in establishing systems where
905 economic operators placing textile products on the market contribute to the collection, sorting, reuse, preparing
906 for reuse and recycling infrastructure for the same products.

907 Other Member States establishing EPR schemes are Greece (Law 4819/2021), and Spain (Law 7/2022), while
908 Italy ⁽⁶⁷⁾ is not far behind.

909 Within the national Climate Law, France is establishing the **Eco-Score** ⁽⁶⁸⁾, which is an online tool that provides
910 the consumer with an idea about the environmental impacts of apparel, with specific characteristics (e.g. weight,
911 fibre composition) selected directly by the consumer from a defined list. In the future, it is planned that economic
912 operators will be able to report the environmental performance of their products via the Eco-Score, so that the
913 Eco-Score will work as an environmental labelling tool. Additionally, it is planned to connect the Eco-Score with
914 the EPR scheme to deploy eco-modulation.

915 The Dutch Government established the **Denim Deal** ⁽⁶⁹⁾, which aims to bolster the use of post-consumer
916 recycled cotton in denim products marketed in the Netherlands. In particular, the signatories of the initiative
917 aim to use 20% post-consumer recycled cotton fibres in 3 million pairs of jeans produced until the end of 2023.

918 The Luxembourg Ministry of the Economy developed the **Product Circularity Data Sheet (PCDS)** ⁽⁷⁰⁾, which
919 aims to provide basic product information about the several steps of the supply chain. Information is gathered

⁶² Green Claim Directive. Proposal for a Directive of the European Parliament and of the Council on substantiation and communication of explicit environmental claims (Green Claims Directive). COM/2023/166 final. Available at [this link](#).

⁶³ Proposal for a Directive of the European Parliament and of the Council on common rules promoting the repair of goods and amending Regulation (EU) 2017/2394, Directives (EU) 2019/771 and (EU) 2020/1828. COM/2023/155 final. Available at [this link](#).

⁶⁴ Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste (Text with EEA relevance). Available at [this link](#).

⁶⁵ French Anti-Waste law for a circular economy. AGEC- Law n°2020-105, 10 February 2020. Available at [this link](#). Code de l'environnement [L541-10-27](#). Code de l'environnement [R543-214 to R541-219](#). Last accessed on 17 December 2023.

⁶⁶ Dutch Decree on extended producer responsibility for textiles. Available at [this link](#). Last accessed on 17 December 2023.

⁶⁷ Announcement of the Italian EPR scheme. Available at [this link](#). Last accessed on 17 December 2023.

⁶⁸ Eco-Score. Available at [this link](#). Last accessed on 17 December 2023.

⁶⁹ The Demin Deal. Available at [this link](#). Last accessed on 17 December 2023.

⁷⁰ Product Circularity Datasheet. Available at [this link](#). Last accessed on 17 December 2023.

920 in five areas: general information, composition, design for better use, design for disassembly, and design for
921 reuse.

922 In February 2023, the State of **California** (USA) introduced the **Responsible Textile Recovery Act** ⁽⁷¹⁾ with
923 Senate Bill 707 (SB-707), which aims to establish an Extended Producer Responsibility scheme for textile
924 products. The bill is currently under scrutiny before its implementation. The bill introduces the concept of a
925 programme operator to oversee the implementation of a stewardship programme. Additionally, the bill would
926 also establish a Textile Stewardship Recovery fund which would receive fees paid by programme operators. This
927 fund will cover the costs associated with programme implementation and enforcement.

928 **4.3 Strategies of the United Nations**

929 The United Nations Environment Programme (UNEP) offers strategic guidance and promotes collaboration
930 across sectors to foster a fair shift towards a sustainable and circular textile value chain. To this end, UNEP
931 promotes numerous activities and publishes studies on its website ⁽⁷²⁾.

932 In particular, UNEP proposes a roadmap with collective actions focusing on nine points (UNEP, 2023a):

- 933 1. Adopt globally sustainable and circular business models.
- 934 2. Contrast overconsumption and overproduction.
- 935 3. Design sustainable and circular textile products.
- 936 4. Improve product care and durability.
- 937 5. Reduce the emissions into the environment during the production stages.
- 938 6. Address social issues along the value chain.
- 939 7. Use of sustainable or recycled materials.
- 940 8. Improve the shared infrastructure of the value chain.
- 941 9. Develop a suitable textile waste management system that avoids landfilling and incineration of textile
942 products.

943 UNEP promotes the engagement of all stakeholders in the value chain to focus on the nine points of the
944 roadmap (UNEP, 2023a).

945 **4.4 Tests and standards**

946 Textile standards in Europe are coordinated by CEN-CENELEC ⁽⁷³⁾. Several working groups are related to the
947 textile industry, mainly CEN/TC248 TEXTILES AND TEXTILE PRODUCTS. **Table 66** in Section 10.3 reports details
948 of technical working groups and scientific committees. On the other hand, ISO/TC 38 TEXTILES encompasses
949 several working groups that deal with international standards for textile properties, testing methods, and quality
950 control. **Table 67** in Section 10.3 includes the technical working groups in ISO/TC 38 that focus on aspects of
951 the textile industry.

952 The knowledge of the available standards in the textile sector is crucial in the development of the PS, because
953 it provides an overview of the technical aspects/parameters of a textile product that can currently be measured
954 via a commonly recognised test/method/tool. Specific standards could potentially be used to propose and/or
955 verify ecodesign requirements, when the PS addresses tasks 6 and 7 of the MEErP.

956 Numerous standards used in the textile industry were classified and some of them were related to the product
957 aspects reported in Article 5 of the ESPR (see Section 10.3):

- 958 • Standards directly related to the intrinsic durability of the textile product, which could address
959 abrasion, pilling, colourfastness, dimensional stability, seam slippage, tear strength, etc.
960 (**Table 68**). Specific textile frameworks already use some of these standards to address

⁷¹ SB-707 Responsible Textile Recovery Act of 2023. Available at [this link](#). Last accessed on 17 December 2023.

⁷² United Nations environment programme. Building Sustainability and Circularity in the Textile Value Chain. Available at [this link](#). Last accessed on 17 December 2023.

⁷³ CenCenelec website. Available at [this link](#). Last accessed on 17 December.

961 durability aspects of textile products. **Table 69** compares how durability parameters for
962 textile products are tested by PEFCR A&F, EU Ecolabel criteria, Blue Angel criteria, and Nordic
963 Swan Ecolabel criteria (see Section 4.5 for information about ecolabels and other
964 environmental labels).

965 • Standards related to the functionality of the textile products, such as antifungal activity,
966 antiviral activity, oil stain repellency, resistance to chlorinated water, resistance to insects,
967 resistance to surface wetting, stain repellency, water repellency, water resistance after aging,
968 wicking (**Table 70**).

969 • Standards used for textile characterisation, such as identification of dyestuff and fibres,
970 thickness, mass per unit area and composition (**Table 71**), which could be a reference for
971 characterising and referring to specific textile products.

972 • Standards for the identification of specific substances, such as alkylphenol ethoxylates
973 (APEO), formaldehyde, and other chemicals (**Table 72**), which are of environmental concern
974 as reported in Section 3.1.3.

975 • Standards related to the loss of fragmented fibres (**Table 73**), which are of environmental
976 concern as reported in Section 3.1.3.

977 • Standards potentially related to circularity and environmental aspects. Almost all of these
978 standards are still under development (**Table 74**).

979 • Standards related to potential information on the care of textile products, because they
980 describe and report labelling symbols (**Table 75**). Apparel properly maintained is more likely
981 to have a longer lifespan (see Section 6).

982 Some of the standards available for the textile industry measure a specific parameter using different methods
983 (e.g. Determination of the abrasion resistance on coated fabrics. Part 1 using taber abrader and Part 2 using
984 martindale abrader). The selection of the method depends mainly on the laboratory equipment used for testing.

985 Only one standard was found addressing non-woven technology to measure the tensile strength and elongation;
986 all the other standards focused on woven and knitted technologies.

987 The analysis did not reveal any standard capable of recognising whether a fibre is of virgin or recycled origin,
988 or of identifying the type of fibres being mechanically recycled. Specific methods to verify this type of
989 information will be investigated in the following milestone, when the PS addresses task 6.

990 In addition to the investigated standards, the textile industry widely deploys a multitude of other standards that
991 are tailored to specific industrial sectors or regional contexts. Notably, several standards are of relevance,
992 including those promulgated by organisations such as the AATCC (American Association of Textile Chemists and
993 Colorists), ASTM (American Society for Testing and Materials), British Standards Institution, JIS (Japanese
994 Industrial Standards), and the GB standards (National Standards of the People's Republic of China), and many
995 more. By adhering to such comprehensive and recognised frameworks, the textile industry can foster
996 consistency, reliability, and quality assurance throughout its global operations.

997 **4.5 Voluntary environmental labels**

998 In general, there are many types of labels, addressing single or multiple environmental issues and covering
999 different sectors and regions. See Section 10.4.1 for more information. Three ISO standards classify voluntary
1000 environmental labels as follows:

1001 — **ISO Type I environmental labels** (ISO 14024:2018)⁽⁷⁴⁾, known as **Ecolabels**, are defined as
1002 '*voluntary, multi-criteria-based and third party-verified labels that indicate an overall*
1003 *environmental preference in a life cycle perspective of a product or service within a specific product*
1004 *category*'.

⁷⁴ ISO 14024:2018. Environmental labels and declarations. Type I environmental labelling. Principles and procedures. Available at [this link](#). Last accessed on 12 January 2024.

1005 — **ISO Type II environmental labels** (ISO 14021:2016)⁽⁷⁵⁾, known as **Self-declared**
 1006 **Environmental Claims**, are neither third-party verified nor based on a Life Cycle Thinking
 1007 approach. Many self-declared environmental claims on the EU market do not necessarily follow
 1008 ISO 14021:2016.

1009 — **ISO Type III environmental labels** (ISO 14025:2016)⁽⁷⁶⁾, known as **Environmental**
 1010 **Declarations**, are labels presenting ‘*quantified environmental information on the life cycle of a*
 1011 *product to enable comparisons between products fulfilling the same function*’. The establishment
 1012 of Product Category Rules ensures that the life-cycle assessment is performed with specific rules
 1013 aiming to foster transparency and facilitate comparisons between different Environmental
 1014 Declarations.

1015 Global environmental labels used in the textile industry were recently analysed (Ranasinghe and Jayasooriya,
 1016 2021) via an investigation including bibliographic research, the Ecolabel Index⁽⁷⁷⁾, and the Global Ecolabelling
 1017 Network⁽⁷⁸⁾. Ranasinghe and Jayasooriya (2021) report that on 20 March 2021 there were 107 environmental
 1018 labels for textiles in the world: 55 used in Europe, 54 used in the USA, 41 used in Asia, 18 used in Latin America,
 1019 19 used in Oceania, and 12 used in Africa. When looking for the same information on 7 February 2024, the ITC
 1020 Standard Map⁽⁷⁹⁾ provided 73 environmental labels for textiles used globally: 58 used in Europe, 50 used in
 1021 USA, 54 used in Asia, 42 used in Latin America, 48 used in Oceania, and 45 used in Africa.

1022 **Table 10** reports the topics that were addressed the most by environmental labels for textiles globally in 2021.
 1023 The majority of the concerns focused on the use of harmful chemicals and toxic substances, as well as natural
 1024 resources. Additionally, specific global regions used environmental labels addressing specific topics: such as
 1025 Europe with ‘Pesticides/herbicides/fungicides’, and Latin America with ‘Carbon/GHG offsets’.

1026 **Table 10.** Top topics addressed by environmental labels for textiles globally in 2021

Topic	Europe	USA	Asia	Latin America	Oceania	Africa
Toxics	X	X	X	X	X	X
Harmful chemicals	X	X		X	X	X
Natural resources	X	X	X		X	X
Pesticides/herbicides/fungicides	X					
Material use	X	X	X			
Waste		X	X	X	X	X
Energy use/efficiency			X	X	X	X
Carbon/GHG offsets				X		

1027 N.B. The topic ‘Toxics’ addresses harmful substances that are already prohibited or regulated; whereas the topic ‘Harmful chemicals’
 1028 addresses substances that are known to be harmful to health, but are not officially banned. The authors of the referenced study use
 1029 the term ‘Chemicals’ when referring to ‘Harmful chemicals’.
 1030 The authors of the referenced study do not specify if the topic ‘Waste’ addresses any kind of waste generated along the value chain, or
 1031 waste generated at a specific stage. No further explanation/specification is provided for other topics.

1032 *Source: Ranasinghe and Jayasooriya (2021)*

1033 **Figure 2** shows the topics addressed by environmental labels used for textiles in 2021 in Europe and their
 1034 number. These environmental labels addressed most of the environmental impacts described in Section 3.3.2.

1035 The analysis showed that the textile industry largely relies on environmental labels, but most of the time actors
 1036 do not state which ISO type standard they follow – if they follow any. This situation causes confusion for the
 1037 consumers, who cannot identify governance, reliability, environmental scope and level of environmental
 1038 ambition of all environmental labels. To fill this gap, some voluntary initiatives try to score, compare and
 1039 describe some environmental labels⁽⁸⁰⁾. The lack of transparency of the numerous environmental labels could
 1040 be further analysed in the 3rd milestone, when the PS addresses the content of the Digital Product Passport.

⁷⁵ ISO 14021:2016. Environmental labels and declarations. Self-declared environmental claims (Type II environmental labelling). Available at [this link](#). Last accessed on 12 January 2024.

⁷⁶ ISO 14025:2006. Environmental labels and declarations. Type III environmental declarations. Principles and procedures. Available at [this link](#). Last accessed on 12 January 2024.

⁷⁷ Ecolabel Index. Website available at [this link](#). Last accessed on 12 January 2024.

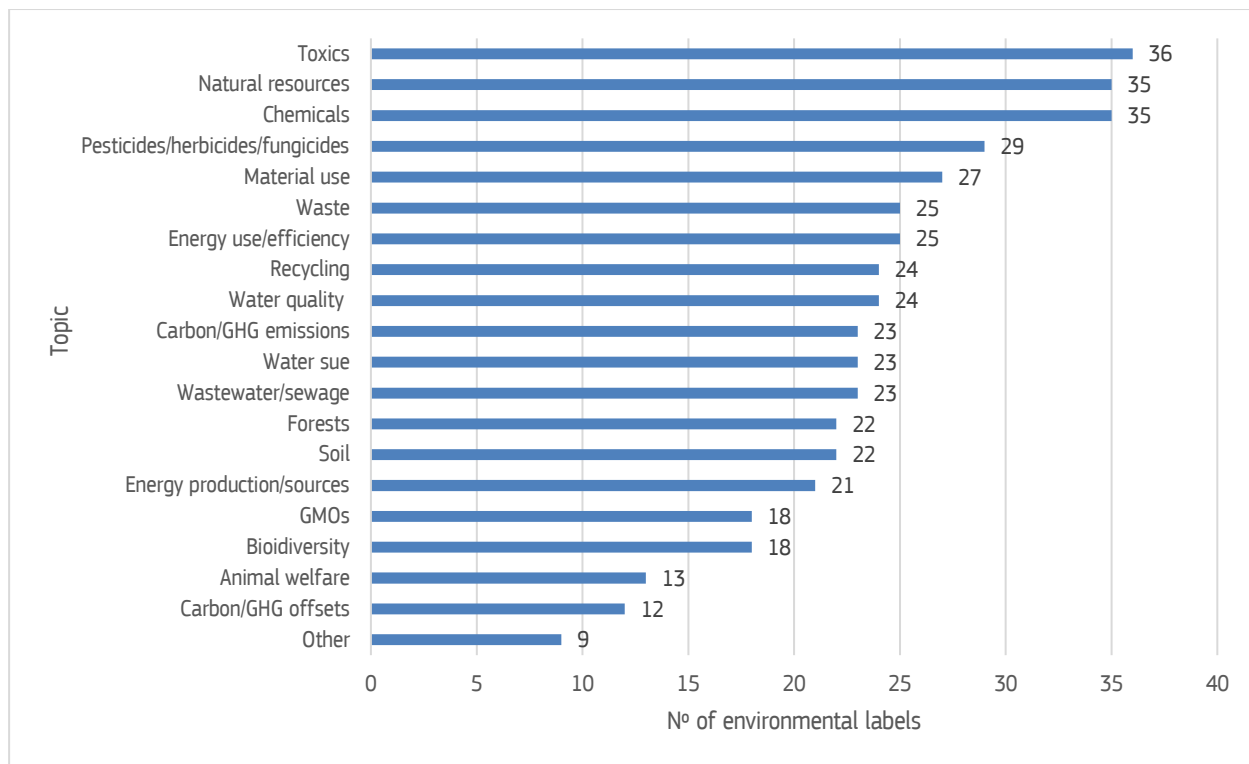
⁷⁸ Global Ecolabelling Network. Website available at [this link](#). Last accessed on 12 January 2024.

⁷⁹ ITC Standards Map App, selecting sectors of clothing and textiles. Available at [this link](#). Last accessed on 7 February 2024.

⁸⁰ ITC Standards Map App. Available at [this link](#). Last accessed on 7 February 2024.

1041 Section 7 assesses in detail the EU Ecolabel criteria for textile products in light of their revision process, as
 1042 described in Section 1. As established by Article 6(3.f) of the EU Ecolabel Regulation, the analysis performed
 1043 considers other ecolabels used in the EU (Blue Angel ⁽⁸¹⁾) and Nordic Swan Ecolabel ⁽⁸²⁾) to enhance synergies.
 1044 Further information about voluntary environmental labels used in Europe is reported in **Table 76** in Section
 1045 10.4.2.

1046 **Figure 2.** Main topics addressed by environmental labels used in 2021 in Europe



1047 N.B. The topic 'Toxics' addresses harmful substances that are already prohibited or regulated, whereas the topic 'Chemicals' addresses
 1048 substances that are known to be harmful to health, but are not officially banned. The authors of the referenced study do not specify
 1049 if the topic 'Waste' addresses any kind of waste generated along the value chain, or waste generated at a specific stage. No further
 1050 explanation/specification is provided for other topics.
 1051 Source: (Ranasinghe and Jayasooriya, 2021)
 1052

Label Directory – Siegelklarheit. Available at [this link](#). Last accessed on 7 February 2024.
 Labels Environnementaux. Available at [this link](#). Last accessed on 7 February 2024.
⁸¹ Blue Angel – The German Ecolabel. Available at [this link](#). Last accessed on 7 February 2024.
⁸² Nordic Swan Ecolabel. Available at [this link](#). Last accessed on 7 February 2024.

1053 **5 Market analysis**

1054 This section analyses the market of the products included in the scope of the PS, addressing many aspects. The
1055 information collected at this stage will feed into the following tasks of the MEErP, in particular task 4 (Section
1056 9) to task 7.

1057 The first subsections analyse the market at different scales: global, EU and Member State (Sections 5.1, 5.2
1058 and 5.3). Section 5.4 presents available market information of elements affecting the production and recycling
1059 of textile apparel. The market structure and the value chain are analysed in Section 5.5 and Section 5.6,
1060 respectively. Section 5.7 analyses the competitiveness at global level, focusing on different environmental
1061 compliance costs that companies placed in different countries must face. Section 5.8 analyses the lifespan of
1062 the products included in the scope. This information is particularly crucial to build a suitable model for the
1063 environmental and economic assessment, as well as the stock analysis (tasks 5 to 7 of the MEErP). The section
1064 concludes with a brief comment about the penetration in the market of the environmental labels used in the
1065 textile sector (Section 5.9).

1066 **5.1 The global market**

1067 **Historical overview**

1068 In 1947, the Grant Agreement on Tariffs and Trade (GATT) was signed by 23 countries to promote free
1069 movement of goods among signing countries. The GATT set the bases for the future institution of the World
1070 Trade Organization (WTO) in 1994⁽⁸³⁾.

1071 From 1974 to 1994, under a special regime outside the GATT framework, the Multifibre Arrangement (MFA) set
1072 rules for international trade of textile products. The MFA was a framework for bilateral agreements or unilateral
1073 actions that established quotas⁽⁸⁴⁾ limiting imports into countries whose domestic industries could be damaged
1074 by a quick rise of imports⁽⁸⁵⁾. The MFA applied only to trade between developed and developing countries, but
1075 not to trade among developed countries. Although the MFA did not comply with the principle of non-
1076 discrimination established in the GATT, developed countries used it to protect their textile industry (Stephen
1077 MacDonald, 2006).

1078 In 1995, within the establishment of the WTO and the revised GATT, the MFA was substituted by the Agreement
1079 on Textiles and Clothing (ATC), which represented the 10-year-long transition towards an international textile
1080 market without quotas⁽⁸⁶⁾. The ATC applied to all the WTO members⁽⁸⁷⁾. Between 1995 and the end of 2004,
1081 quotas were gradually removed⁽⁸⁸⁾.

1082 Since 1 January 2005, the trade of textile products among WTO members has been free of quotas.

1083 In June 2005, the European Commission signed a Memorandum of Understanding with China to keep the
1084 imports of specific textile products⁽⁸⁹⁾ below some thresholds until the end of 2007. This action was intended
1085 to prevent distortion of the European textile sector⁽⁹⁰⁾.

1086 Since 2005, the European textile market has been completely open to imports of any product coming from any
1087 country belonging to the WTO.

1088 In 2005, the removal of quotas from the global textile market caused an increase in production and employment
1089 in Asian countries, such as China, India, Türkiye, Hong Kong, Bangladesh, and Indonesia (Hildegunn Kyvik Nordås,
1090 2004). Already in the 1970s, textile production had started moving from Europe and North America mainly to

⁸³ The General Agreement on Tariffs and Trade (GATT 1947) – the legal text available on [this World Trade Organization webpage](#), last accessed on 29 September 2023.

⁸⁴ A quota is a government-imposed trade restriction that limits the number or monetary value of goods that a country can import or export during a particular period (Adam Barone, 2022)

⁸⁵ Textiles: back in the mainstream – [World Trade Organization webpage](#), last visited on 29 September 2023.

⁸⁶ Textiles Monitoring Body (TMB) The Agreement on Textiles and Clothing – [World Trade Organization website](#), last accessed on 29 September 2023. Marrakesh Agreement Establishing the World Trade Organization – [World Trade Organization website](#), last accessed on 29 September 2023.

⁸⁷ The list of WTO members and dates of membership are available here: https://www.wto.org/english/res_e/booksp_e/sli_e/4wtomembers.pdf

⁸⁸ Textiles: back in the mainstream – [World Trade organization webpage](#), last visited on 29 September 2023.

⁸⁹ Ten types of products were included in the Memorandum of Understanding between EU and China: pullovers, men's trousers, blouses, t-shirts, dresses, bras, flax yarn, cotton fabrics, bed linen, table and kitchen linen.

⁹⁰ EU – China textile agreement 10 June 2005. Available at [this link](#). Last accessed on 29 September 2023.

1091 Asia and other developing regions of the world ⁽⁹¹⁾. In 1996, Asia was the predominant global exporter of apparel
 1092 products, contributing to more than 32% of the world's apparel exports (ILO News, 1996). However, the general
 1093 lack of transparency of the textile supply chain until the 2010s does not allow a description over time of EU
 1094 textile outsourcing ⁽⁹²⁾.

1095 In September 2008, the financial crisis that originated in the USA rapidly affected major economies due to their
 1096 interconnections. The EU experienced the Great Recession between 2008 and 2009. Following a brief period of
 1097 recovery, many Member States subsequently became vulnerable to the sovereign debt crisis (Szczepanski,
 1098 2019). This global crisis significantly impacted the European textile industry which had already been hit by
 1099 offshoring and the increased competitiveness of the Chinese industry after 2005 (Maya Forstater, 2010).

1100 In 2020, the outbreak of the COVID-19 pandemic led to international economic and social disruptions, including
 1101 the most significant global recession since the time of the Great Depression in the 1930s (Gita Gopinath, 2020).
 1102 The main effects of the pandemic on the European textile industry were: (a) a decrease in production, (b) the
 1103 conversion of traditional production, for some companies, into the manufacture of sanitary products or face
 1104 masks, and (c) an extraordinary growth in sales via online channels (Vet et al., 2021).

1105 In 2022, two main factors negatively affected the competitiveness of the European textile industry. First, the
 1106 increase of the energy price in Europe which was over six times that in the USA, China, and other Asian countries.
 1107 In this context, numerous textiles and apparel companies either operated with a net loss or ceased their
 1108 production activities (EURATEX, 2022b). Second, countries strongly supported their domestic textile industries,
 1109 despite being minimally affected by the energy crisis (EURATEX, 2022b).

1110 **Table 11** sums up the historical events and international agreements affecting the European apparel sector.

1111 **Table 11.** Main historical events and international agreements affecting the European apparel sector

Year	Event
1974 to 1994	The Multifibre Arrangement (MFA), with the establishment of import quotas, protected the domestic market of developed countries from products produced in developing countries.
1995 to 2004	The Agreement on Textiles and Clothing (ATC) established a progressive removal of import quotas set with the MFA.
2005 onwards	Among members of the World Trade Organization (WTO), any trade of textile products were free of barriers – all import quotas were removed.
2005 to 2007	The Memorandum of Understanding between the EU and China allowed the monitoring of specific types of textile products imported from China. It aimed to prevent market distortions in the European textile sector.
2008	The Great Recession impacted the European textile sector.
2020	The COVID-19 pandemic led to global recession.
2022	The price of energy strongly increased in EU.

1112 *Source: own elaboration based on World Trade Organization website*

1113 Global figures

1114 Globally, the apparel sector includes two thirds of the textile industry (EURATEX, 2020; EURATEX, 2022a). It is
 1115 part of one of the largest industries in the world, if teamed up with the footwear sector in the fashion industry
 1116 (McKinsey & Company and BOF, 2016). **Table 12** reports the effects of the COVID-19 pandemic on the size of
 1117 the fashion market from 2019 to 2021. The fashion market shrank about 4% and 21% at global and European
 1118 scale, respectively. **Table 13** lists the largest global exporters and importers of apparel in 2019 in terms of
 1119 value as reported by the World Trade Organization. A more detailed description of producing countries at specific
 1120 phases of the apparel value chain is provided by a study published by the United Nations Environmental
 1121 Programme (**Figure 3** and **Figure 4**) ⁽⁹³⁾.

1122 — The apparel export market is dominated by China and the EU, followed by Bangladesh, Vietnam,
 1123 India and Türkiye.

⁹¹ Globalization Changes the Face of Textile, Clothing and Footwear Industries. Available at [this link](#). Last accessed on 29 September 2023.

⁹² Follow the Thread - The Need for Supply Chain Transparency in the Garment and Footwear Industry. Available at [this link](#). Last accessed on 29 September 2023.

⁹³ It is not clear to the authors which parameter, e.g. value, mass or any other, was used to develop the percentages reported in **Figure 4**, which is Figure 5 on page 16 of [UNEP_ \(2020\)](#).

- 1124 — The apparel import market is dominated by the EU and the USA, followed by Japan, the UK, Hong
 1125 Kong, Canada and the Republic of Korea.
- 1126 — The role of China is prominent in all production phases of the value chain.
- 1127 — The role of the EU is prominent both in terms of exports and imports.

1128 **Table 12.** Market data of the apparel and apparel & footwear industries at global and European scale

Industry	Market	Economic parameter	Year	Reported value	Value (bn EUR) ^(a)	Source
Apparel and footwear	Global	Retail Sale Price	2019	USD 1 773 bn	1 644.3	(b)
			2021	USD 1 717 bn	1 592.3	
Apparel	European	Turnover	2019	EUR 72.8 bn	72.8 bn	(c)
			2021	EUR 65.3 bn	65.3 bn	(d)

1129 N.B. The retail sale price is the price declared by the producer or importer of the goods after deducting any tax included in that price.
 1130 The turnover refers to the totals invoiced by the unit, and it corresponds to market sales of goods.

1131 ^(a) 1 USD = 0.92739 EUR Feb 08, 2024 10:12 UTC.

1132 Source: (b) Fashion United, based on Euromonitor ⁽⁹⁴⁾, (c) EURATEX (2020), (d) EURATEX (2022)

1133 **Table 13.** Top global exporters and importers of apparel in 2019

Rank	Exports			Imports		
	Country	Value (bn EUR)	Share in world exports (%)	Country	Value (bn EUR)	Share in world imports (%)
1	China ^(a)	141.0	30.8	EU	88.1	18.1
2	EU	39.9	8.8	USA	88.1	18.2
3	Bangladesh ^(b)	31.5	6.8	Japan	27.8	5.7
4	Vietnam ^(b)	28.7	6.2	United Kingdom	24.1	5.0
5	India	15.8	3.5	Hong Kong, China	10.2	NA
6	Türkiye	14.8	3.2	Canada ^(c)	10.2	2.1
7	Hong Kong, China	11.1	NA	Republic of Korea	10.2	2.1
8	United Kingdom	8.3	1.8	China ^(a)	8.3	1.7
9	Indonesia	8.3	1.7	Russian Federation ^(c)	7.4	1.5
10	Cambodia ^(b)	8.3	1.7	Switzerland	7.4	1.5

1134 ^(a) Includes significant shipments through processing zones. ^(b) Estimates of WTO. ^(c) Imports are valued free on board.

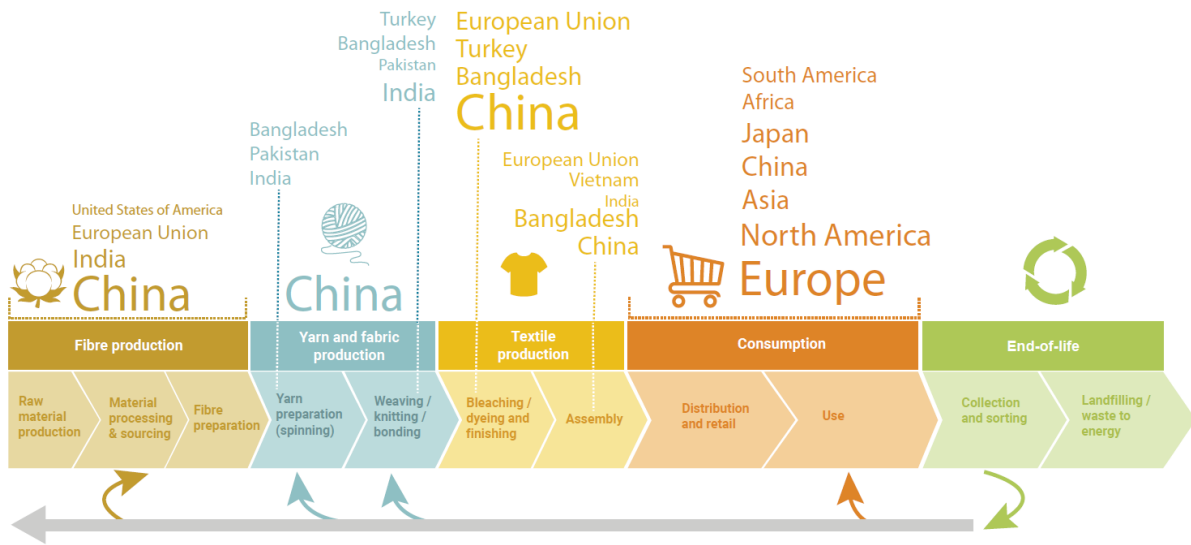
1135 1 USD = 0.92739 EUR Feb 08, 2024 10:12 UTC.

1136 Source: (WTO, 2020)

⁹⁴ Information collected from the website Fashion United, Global Fashion Industry Statistics, available [here](#), Euromonitor International, a market research provider, last accessed on 24 October 2023.

1137

Figure 3. Geographical breakdown of global apparel production and consumption – representation A



1138

1139

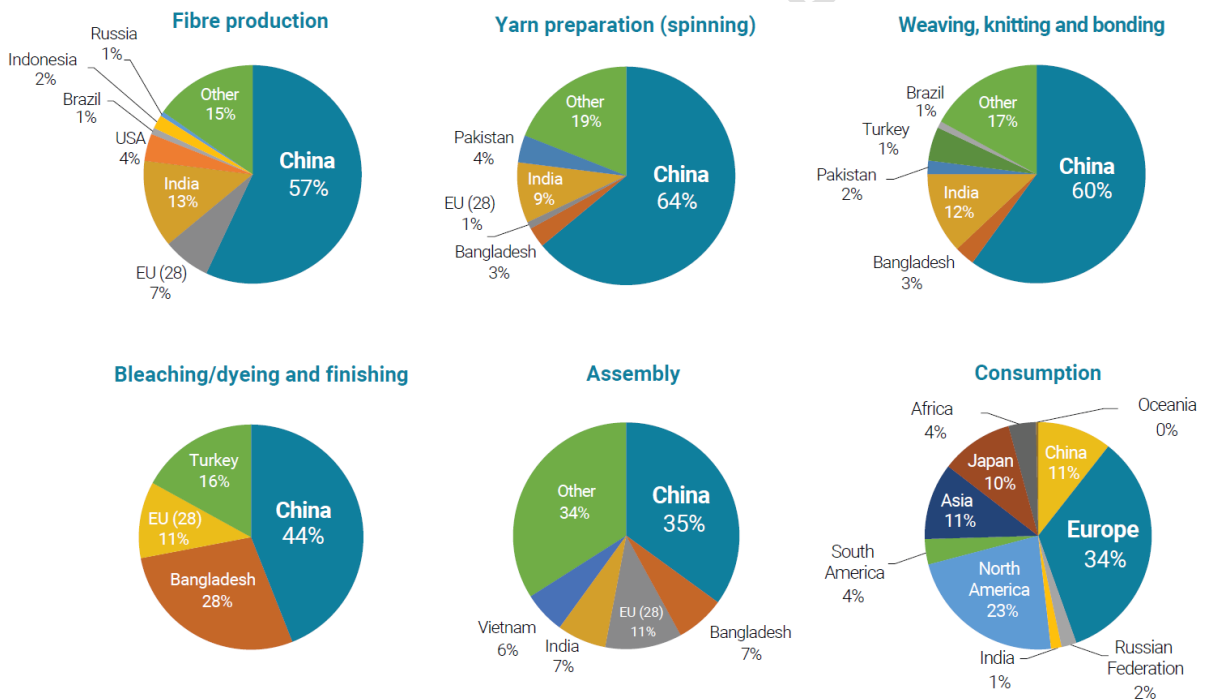
1140

N.B. The European Union is different to Europe.

Source: (UNEP, 2020)

1141

Figure 4. Geographical breakdown of global apparel production and consumption – representation B



1142

1143

1144

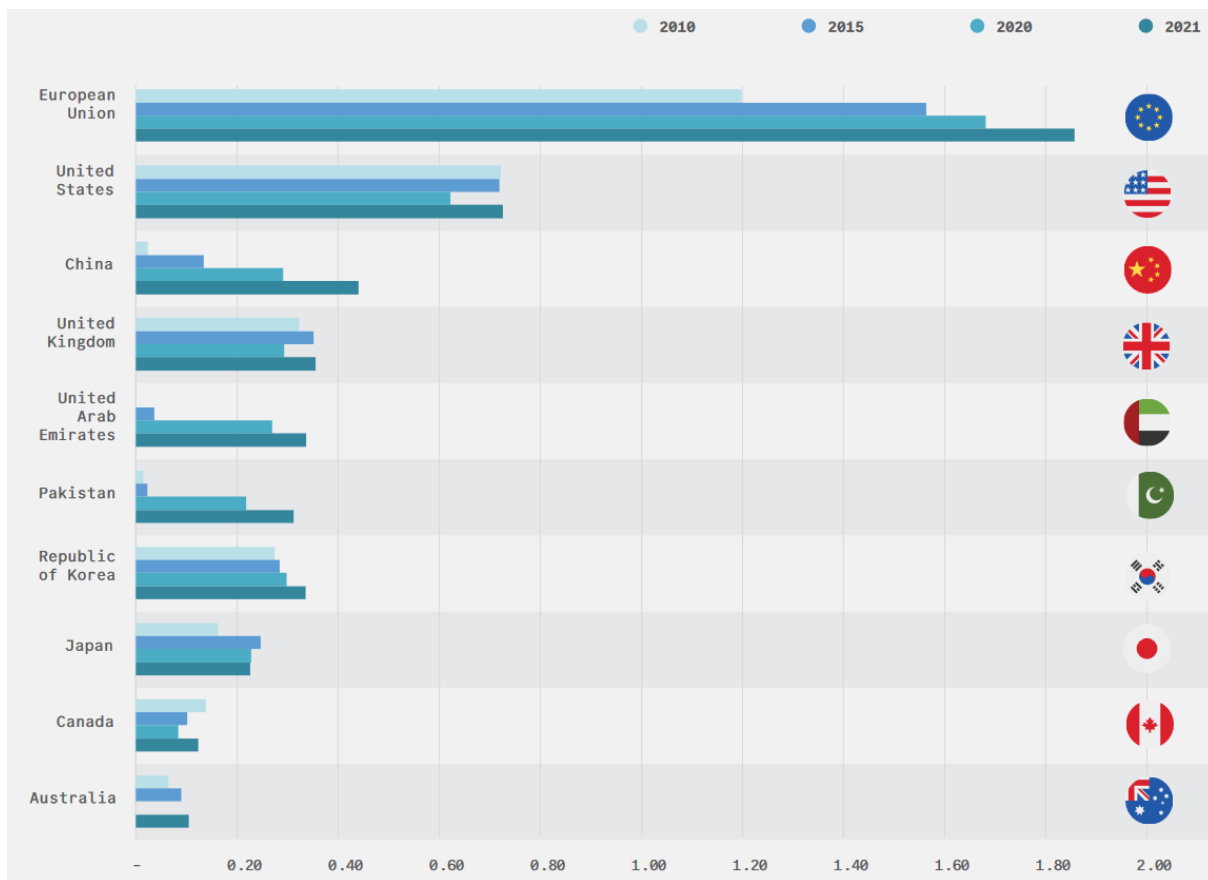
N.B. The EU figures include the United Kingdom. The EU is different to Europe.

Source: (UNEP, 2020)

1145 A global mapping of the textile waste management is currently not available. However, the United Nations and
 1146 the European Environment Agency investigated the fate of used textile products (Lingås et al., 2023; UNECE
 1147 and ECLAC, 2024). **Figure 5** and **Figure 6** show the most exporting and importing countries in the world of
 1148 second-hand apparel in terms of mass. The European Union is the largest exporter, while Pakistan is the largest
 1149 importer. **Figure 6** shows that the European Union is the second largest importer, most probably because there

1150 are five countries (⁹⁵) in EU that export to countries outside EU what is collected locally and what it is imported
1151 by other EU countries (Lingås et al., 2023).

1152 **Figure 5.** Top ten exporting countries of second-hand apparel by mass (million tonnes)



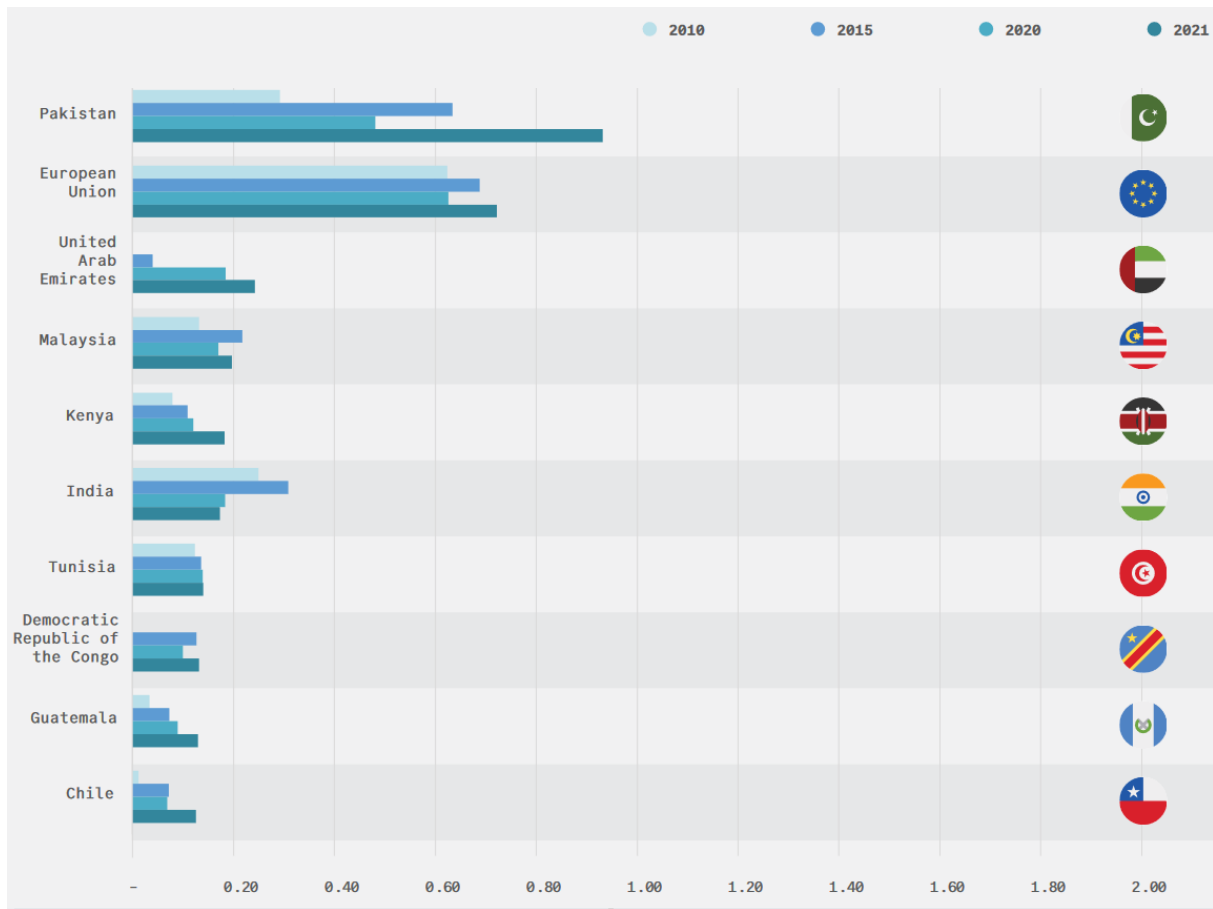
1153
1154 Source: (UNECE and ECLAC, 2024) based on UN Comtrade - HS Code 6309: Worn Clothing and Other Worn Textile Articles

DRAFT

⁹⁵ Overall Belgium, Germany, Italy, the Netherlands, and Poland, are the hubs responsible for most of the exports (Lingås et al., 2023)

1155

Figure 6. Top ten importing countries of second-hand apparel by mass (million tonnes)



1156

1157

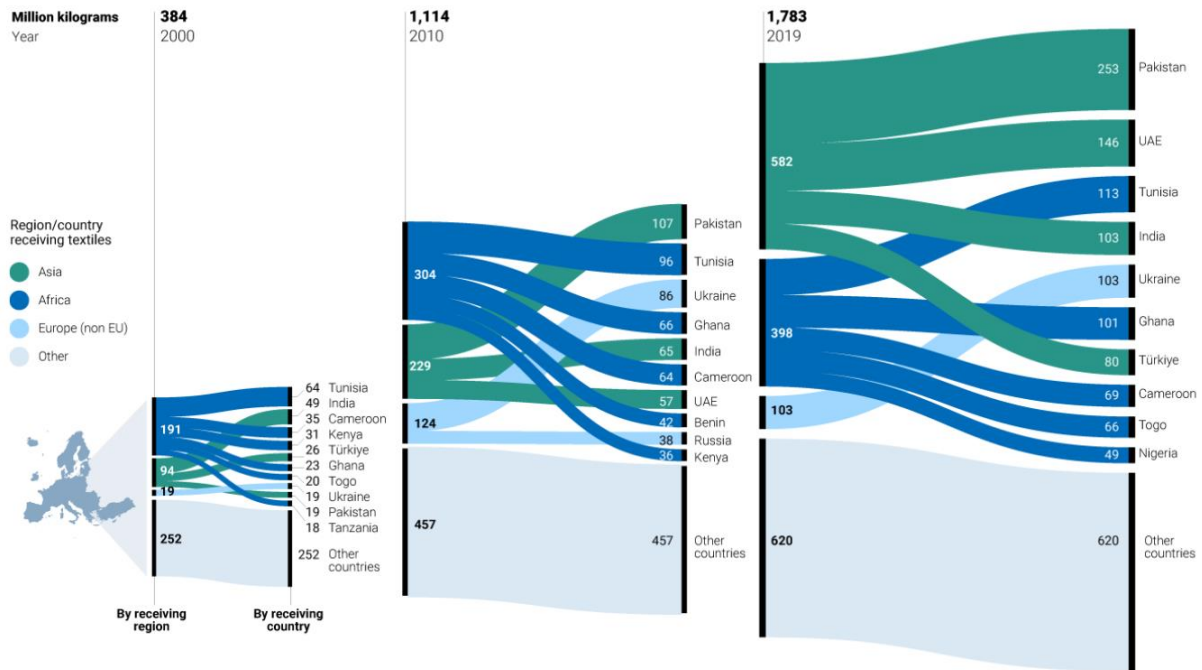
Source: (UNECE and ECLAC, 2024) based on UN Comtrade – HS Code 6309: Worn Clothing and Other Worn Textile Articles

1158 Over the last 20 years, the EU exported an increasing amount of used textile waste:

1159 The export of used textiles from the EU has steadily risen over the last 20 years, from a little more than 384 000
1160 tonnes in 2000, to almost 1.7 million tonnes in 2019 (**Figure 7**). The value of these exports has, however
1161 steadily decreased, from EUR 0.76 in 2000, to EUR 0.57 per kilogram in 2019.

1162

Figure 7. EU-27 exports of used textiles



1163

1164

1165

UAE is an acronym for United Arab Emirates

Source: (Lingås et al., 2023) based on UN Comtrade

1166

1167 EU global partners

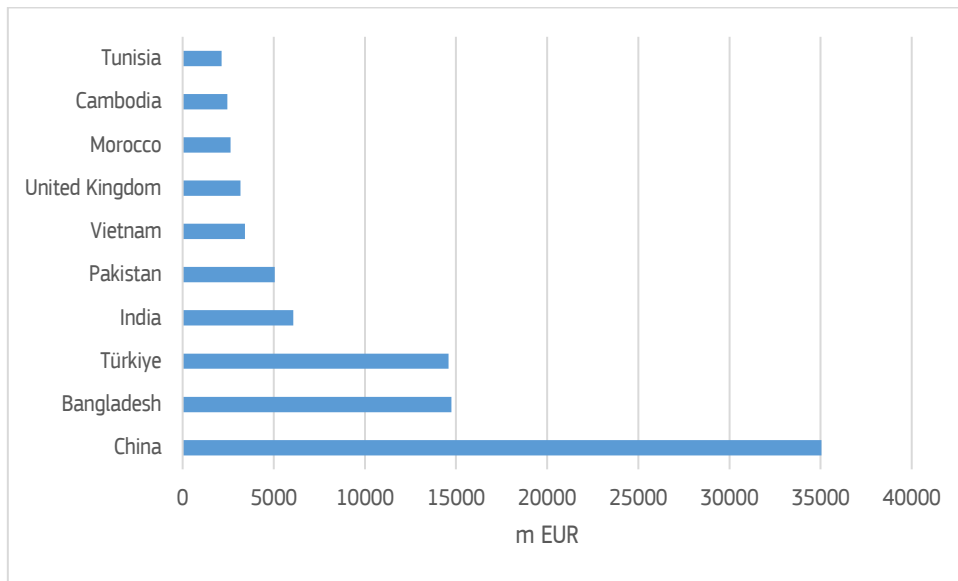
1168 Only a few key partners dominate the EU's trade interactions. In 2021, the top 10 EU suppliers of textiles and
1169 apparel made up 84% of all EU imports from non-EU countries. In the same year, the top 10 export partners of
1170 the EU purchased 68% of all exports to third countries. (EURATEX, 2022a) ⁽⁹⁶⁾: **Figure 8** and **Figure 9** show the
1171 main EU suppliers and customers of textiles and apparel in 2021.

1172 The pivotal role of the EU goes beyond economics due to Europe's consolidated history and reputation in fashion
1173 and design.

⁹⁶ EURATEX (2022) reports data as textile and clothing, which includes the following types of textile products: clothing and accessories, industrial and technical textiles, fabrics, home textiles, knitwear, man-made fibres, yarns, underwear, and workwear.

1174

Figure 8. The EU's main suppliers of textiles and apparel in 2021



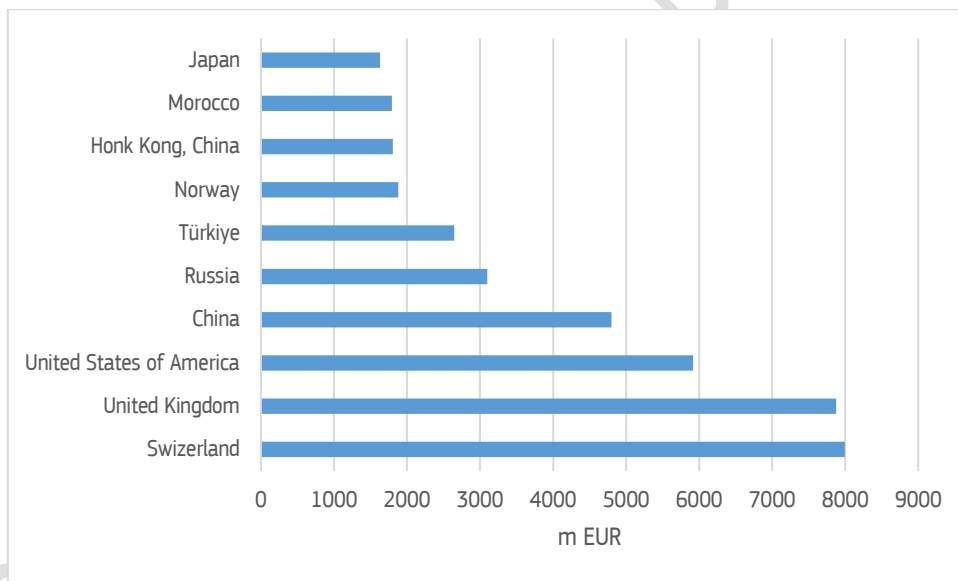
1175

1176

Source: EURATEX (2022a)

1177

Figure 9. The EU's main customers of textiles and apparel in 2021



1178

1179

Source: EURATEX (2022a)

1180 Innovation

1181 The European textile industry is an innovation leader worldwide. In 2019, more than 200 000 industrial designs
1182 were released by the EU-27, compared to about 50 000 and 20 000 from USA and China, respectively.
1183 Additionally, from 2015 to 2019, about 6 600 patents were filed by the EU-27, compared to about 6 000,
1184 5 800, and 3 900, by the Republic of Korea, the USA and China, respectively (EURATEX, 2022a).

1185 5.2 The EU market

1186 The PRODCOM dataset ⁽²⁸⁾ collects information about the textile apparel market. This section reports an analysis
1187 focusing on the evolution of market indicators of the EU-27 from 1995 to 2022. Details about data used are
1188 available in Section 10.1. In particular, **Table 59** describes the codes used for the analysis and their allocation
1189 to the specific product categories. Additionally, **Table 60** describes how codes merged or were introduced over
1190 the years and specifies potential missing data.

1191 The available data allow an analysis of big trends over time, rather than interpretation of small changes, or
1192 differences, in a specific year.

1193 The textile apparel market in the EU-27 was affected by all the historical events reported in Section 5.1. **Figure**
1194 **10** shows its evolution via four market indicators: production, import, export, and apparent consumption ⁽²⁹⁾.
1195 These indicators were analysed from the perspective of the mass, the value and the value-to-mass ratio of the
1196 textile apparel. The analysis led to the following observations.

1197 *Apparent consumption*

1198 — Apparent consumption followed the evolution of imports in all analysed perspectives: mass, value
1199 and value-to-mass ratio. This means that the market is largely affected by imported products.

1200 — From 2004 to 2005, the apparent consumption increased by 90% if expressed as mass, and 50%
1201 if expressed as value. This corresponds to the year when import quotas were removed (**Table 11**).

1202 *Production*

1203 — From 2003 to 2009, production decreased by about 53% if expressed as mass and about 35% as
1204 value, most probably due to the expected import quota removal in 2005 and the subsequent
1205 increase in imports. Sector experts revealed that in those years many EU-27 producers relocated
1206 their production to third countries.

1207 — From 2009 to 2019, production evolved relatively constantly, fluctuating between 0.7-0.9 billion
1208 kg, and EUR 23.9-27.9 billion.

1209 *Export*

1210 — With the exception of a disruption around 2003-2004, export followed a relatively constant trend
1211 in terms of mass, and a slightly increasing trend in terms of value.

1212 — Between 2009 and 2019, while production evolved relatively constantly in terms of mass and
1213 value, exports increased by 63% and 110%, in terms of mass and value, respectively. These very
1214 different increase rates led export to overtake production in terms of value from 2015 to 2022.
1215 These figures are possible because, as reported in Section 10.1.2, PRODCOM accounts for every
1216 time a product passes through EU customs. This means that a product could be imported and
1217 subsequently exported without undergoing any mass modification, but with an increased value.
1218 Most probably, after 2015, export has higher values than production because many EU companies
1219 import products that afterwards are exported with a higher value.

1220 *Import*

1221 — The removal of the import quota established the largest change in the EU market of textile apparel.
1222 **Table 14** reports the change that occurred in the apparent consumption when comparing two time
1223 intervals: 1995-2004 and 2005-2019, before and after the EU removed the import quota. The
1224 apparent consumption of textile apparel in general increased by 86% in mass and 27% in value.
1225 This increase was mainly driven by product categories like t-shirts (236% in mass and 133% in
1226 value), pants and shorts (194% in mass and 58% in value), jackets and coats (129% in mass and
1227 14% in value), and shirts and blouses (110% in mass and 38% in value) (**Table 14**). For the
1228 majority of the product categories, the increase in mass is very much larger than the increase in
1229 value. This could flag the purchase every year of more products at lower prices. More details are
1230 reported in **Table 61** in Section 10.1.5.

1231 *Additional observations*

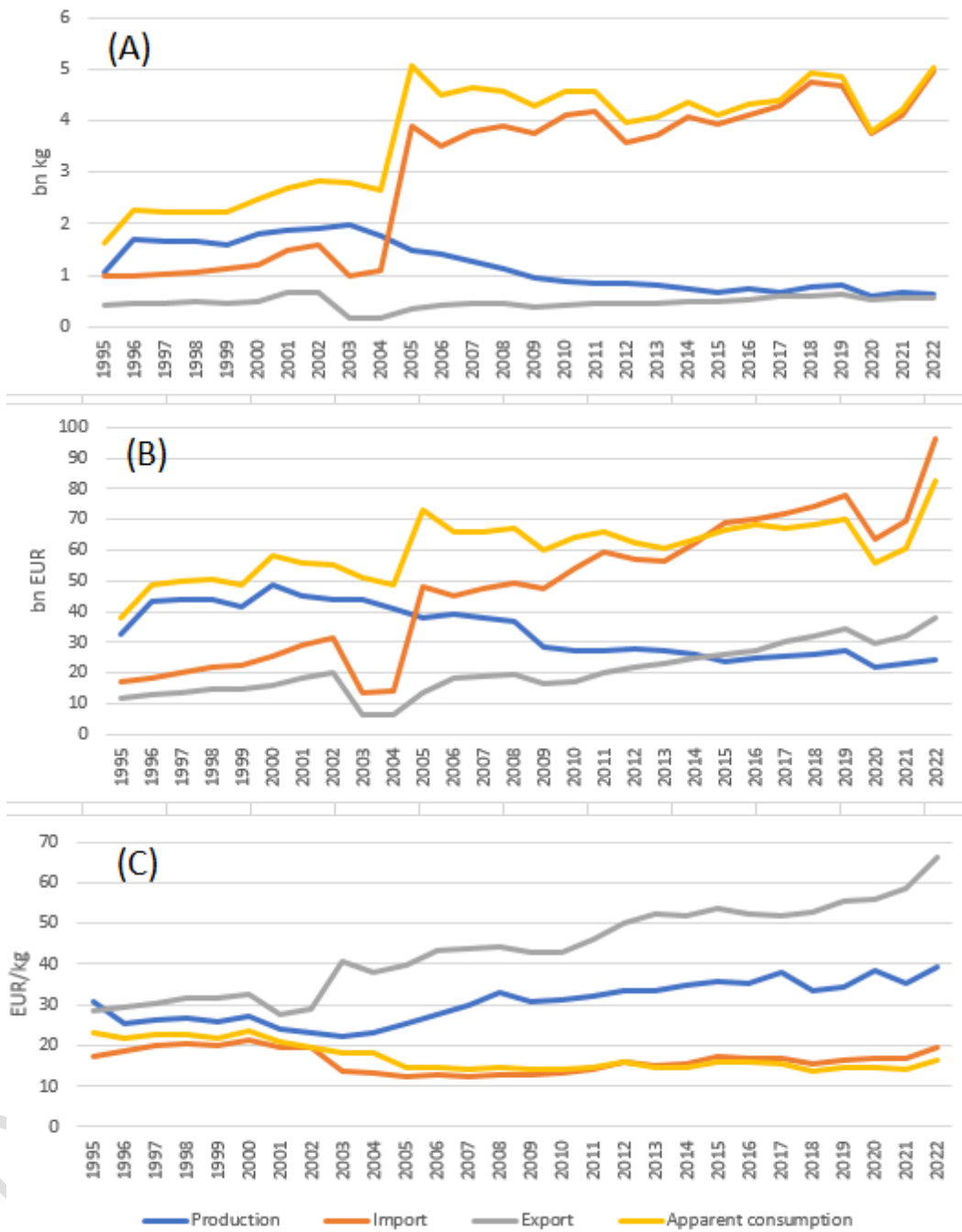
1232 — From 1996 to 2022, the value-to-mass ratio of export, production and import always had the
1233 highest, middle and lowest value each year, respectively. Before 2000, the gap among these
1234 market indicators was limited, but after 2002 the gap progressively increased.

1235 — In 2020, the COVID-19 pandemic strongly impacted the market: production, import and export
1236 decreased by 27%, 20% and 16%, respectively.

1237 The same market indicators were normalised by number of EU-27 citizens over the years to investigate the
1238 possible impact of the change in the EU population. Nevertheless, the analysis provided the same trends over
1239 the years (**Figure 29**).

1240 All textile apparel categories were further investigated. The results of this analysis are reported in Section
 1241 10.1.5.

1242 **Figure 10.** Market indicators for textile apparel in the EU-27



(A) Total mass; (B) Total value; (C) Value-to-mass ratio

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

1243

1244

1245

1246

1247 **Table 14.** Change of apparent consumption between the time intervals 1995-2004 and 2005-2019

Product category or subgroup	Change in mass (%)	Change in value (%)
1.T-shirts	236	133
2. Shirts and blouses	110	38
3. Sweaters and mid-layers	86	12
4. Jackets and coats	129	14
5. Pants and shorts	194	58
6. Dresses, Skirts and jumpsuits	33	20
7. Leggings, Stockings, Tights and socks	-33	-13
8. Underwear	15	-13
9. Swimwear	100	13
10. Accessories	11	20
Textile apparel	86	27

1248 N.B. The change is calculated by comparing the average mass and the average value in the two time intervals.

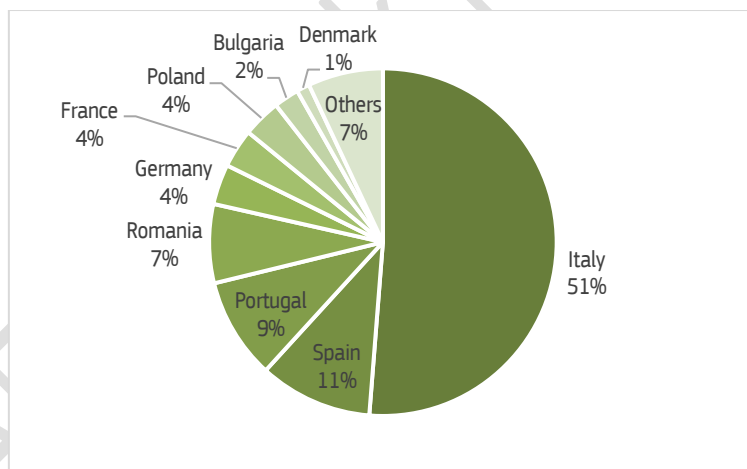
1249 More details are reported in **Table 61** in Section 10.1.5.

1250 *Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)*

1251 **5.3 Role of the EU Member States**

1252 The PRODCOM database was investigated to understand which Member States play a more relevant role in the
 1253 textile apparel market. **Figure 11** and **Figure 12** show the largest producers and exporters, respectively. The
 1254 analysis focuses on 2019, because this is the last year without market disruptions. Italy accounted for half of
 1255 the EU-27 production, followed by Spain, Portugal and Romania, which covered 11%, 9%, and 7% of the total,
 1256 respectively. The most relevant exporters in 2019 were Italy, Germany, Spain and the Netherlands, with 19%,
 1257 18%, 12%, and 10% of the total, respectively.

1258 **Figure 11.** Member States producing textile apparel in 2019



Composition based on value

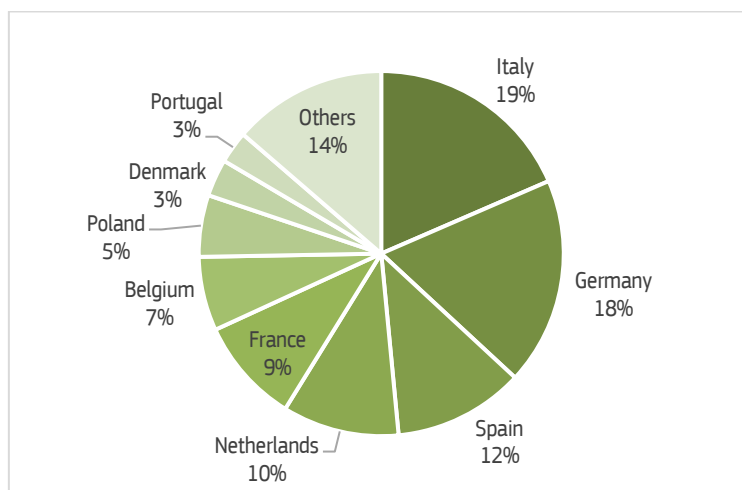
1259

1260

1261 *Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)*

1262

Figure 12. Member States exporting textile apparel in 2019



Composition based on value

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

1263

1264

1265

1266 The relevance of these countries is confirmed over the years. A recent study published by the EC recognises
1267 Italy, Germany, France and Spain as the most prominent Member States in the textile ecosystem (DG GROW,
1268 2021a). These countries have the largest number of companies and generate the highest value in terms of
1269 production and turnover. Additionally, most of the EU companies operating in the textile ecosystem have their
1270 headquarters in Italy, Germany, France and Spain. central and eastern European Member States focus on more
1271 labour-intensive activities and generate a smaller share of turnover. Nonetheless, the main EU companies often
1272 locate certain production facilities in central and eastern Europe.

1273 The European Apparel and Textile Confederation (EURATEX) confirmed in their last report on key facts and
1274 figures that Italy is recognised as the largest contributor to the textile and clothing industry in the EU. Other
1275 important countries are Germany, France, Spain, the Netherlands and Portugal. These are also the countries
1276 that invest the most in innovation (EURATEX, 2022a).

1277 **5.4 Main elements affecting the production of textile apparel**

1278 Section 3.3 describes the life-cycle stages of textile apparel, reporting all the main elements that are crucial for
1279 production. This section analyses the market characteristics of these elements, which are fibres, chemicals,
1280 energy and water.

1281 **5.4.1 Fibres**

1282 In recent years, the estimates of textile fibre production followed an increasing trend going from 104-
1283 111 million tonnes in 2019 to 116-124 million tonnes in 2022 (Textile Exchange, 2020; Textile Exchange, 2023).
1284 About 54% of these fibres are polyester, about 23% cotton, about 6% man-made cellulosic fibres and 5%
1285 polyamide. In 2021 and 2022, the production of viscose was equal to 5.8 million tonnes. **Table 15** reports the
1286 estimates of textile fibre production for 3 recent years, showing that about 70% are chemical fibres, while
1287 about 30% have a natural origin.

1288

1289

Table 15. Estimates of global production of textile fibres and group of fibres

Rank	2019 ^(a)			2021 ^(b)			2022 ^(c)		
	Fibre	Mass (m tonnes)	Share of the total (%)	Fibre	Mass (m tonnes)	Share of the total (%)	Fibre	Mass (m tonnes)	Share of the total (%)
1	Polyester	57.70	52	Polyester	60.50	51	Polyester	63.30	56
2	Cotton	25.70	23	Cotton	24.40	20	Cotton	25.50	23
3	MMCFs	7.10	6	MMCFs	7.20	6	MMCFs	7.30	6
4	Other plant based	6.50	6	Other plant based	6.70	6	Polyamide	6.20	5
5	Polyamide	5.60	5	Polyamide	5.90	5	Other plant based	6.03	5
6	Wool-sheep	1.00	<1	Viscose	5.80	5	Viscose	5.80	5
7	Down	0.27	<1	Polypropylene	3.00		Polypropylene	3.10	3
8	Other animal-based	0.05	<1	Acrylics	1.7		Acrylics	1.60	1
9	Silk	0.16	<1	Elastane	1.20	1	Elastane	1.20	1
10	Acetate	NA	NA	Wool-sheep	1.00	<1	Wool-sheep	1.10	1
11	Acrylics	NA	NA	Acetate	0.90	<1	Acetate	0.90	<1
12	Cupro	NA	NA	Down	0.57	<1	Down	0.61	<1
13	Elastane	NA	NA	Lyocell	0.30	<1	Flax	0.38	<1
14	Flax	NA	NA	Modal	0.20	<1	Hemp	0.30	<1
15	Hemp	NA	NA	Silk	0.17	<1	Lyocell	0.30	<1
16	Lyocell	NA	NA	Other animal based	0.05	<1	Modal	0.20	<1
17	Modal	NA	NA	Cupro	0.02	<1	Silk	0.09	<1
18	Polypropylene	NA	NA	Flax	NA	NA	Other animal based	0.05	<1
19	Viscose	NA	NA	Hemp	NA	NA	Cupro	0.01	<1

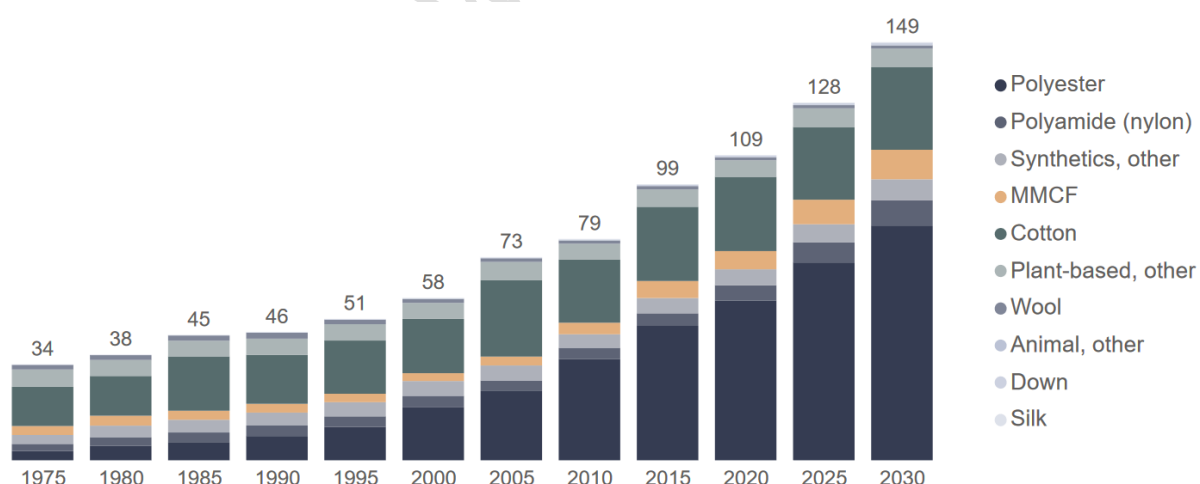
1290 N.B. Estimates of total production were between: 104 m and 111 m tonnes in 2019; 113 m and 115 m tonnes in 2021; 116 m and 124 m
 1291 tonnes in 2022.

1292 MMCF: man-made cellulosic fibres; NA: Not available.

1293 Source: adapted from ^(a) Textile Exchange (2020), ^(b) Textile Exchange (2022), ^(c) Textile Exchange (2023)

1294

Figure 13. Global fibre production: historical data and future projections (millions of tonnes)



1295

1296

Source: Textile Exchange (2022)

1297 **Figure 13** shows the evolution of the production of specific fibres from 1975 to 2020, and it foresees quantities
 1298 for 2025 and 2030. In the first 25 years (from 1975 to 2000), the total production increased by 49% (from
 1299 39 million to 58 million tonnes), whereas in the second 20 years (from 2000 to 2020), the total production
 1300 increased by 88% (from 58 million to 109 million tonnes). Future projections foresee a further increase up to
 1301 149 million tonnes in 2030. The evolution of fibre production is mainly driven by the increase in production of
 1302 polyester.

1303 Most of the fibres produced globally are of unknown origin, due to the difficulties of tracing information (see
 1304 Section 5.6). Nevertheless, the available information shows the global dimension of fibre production, with China
 1305 and India producing most of the fibres, and many more countries from all continents producing specific fibres
 1306 (from **Table 16** to **Table 20**).

1307 **Table 16.** Location of production for specific textile fibres

Polyester (PES)	MMCF	Polyamide (PA)	Wool	Other animal fibres
Unknown 70% China 13% Others 10% Türkiye 7%	Unknown 58% China 18% Others 16% India 5% Indonesia 3%	Unknown 81% China 15% Taiwan 3% USA 1%	Unknown 55% Australia 17% South Africa 15% New Zealand 10% Others 3%	China 88% Unknown 9% Hungary 2% Poland 1%

1308 N.B. MMCF: man-made cellulosic fibres.

1309 Source: adapted from (Textile Exchange, 2022a)

1310 **Table 17.** Production of cotton lint in the season 2021-22

Rank	Country	Mass (1 000 tonnes)	Share of the total (%)
1	India	5 900	22.6
2	China	5 730	21.9
3	USA	3 963	15.2
4	Brazil	2 678	10.2
5	Pakistan	981	3.8
6	Uzbekistan	940	3.6
7	Türkiye	833	3.2

1311 World production was estimated equal to 26 134 000 tonnes

1312 Source: International Cotton Advisory Committee website, available at [this link](#). Last visited on 13 December 2024

1313 **Table 18.** Import of cotton lint in the season 2021-22

Rank	Country	Mass (1 000 tonnes)	Share of the total (%)
1	China	2 520	24.8
2	Bangladesh	1 688	16.6
3	Vietnam	1 576	15.5
4	Pakistan	1 200	11.8
5	Türkiye	1 170	11.5
6	Indonesia	539	5.3
7	Mexico	178	1.8

1314 World import was estimated equal to 10 153 000 tonnes.

1315 Source: International Cotton Advisory Committee website, available at [this link](#). Last visited on 13 December 2024

1316 **Table 19.** Export of cotton lint in the season 2021-22

Rank	Country	Mass (1 000 tonnes)	Share of the total (%)
1	USA	3 375	33.2
2	Brazil	2 064	20.3
3	India	816	8.0
4	Australia	749	7.4
5	Benin	321	3.2
6	Greece	299	2.9
7	Mali	283	2.8

1317 World export was estimated equal to 10 153 000 tonnes.

1318 Source: International Cotton Advisory Committee website, available at [this link](#). Last visited on 13 December 2024

1319 **Table 20.** Consumption of cotton lint in the season 2021-22

Rank	Country	Mass (1 000 tonnes)	Share of the total (%)
1	China	8 200	31.4
2	India	5 698	21.8

Rank	Country	Mass (1 000 tonnes)	Share of the total (%)
3	Pakistan	2 152	8.2
4	Bangladesh	1 660	6.4
5	Türkiye	1 617	6.2
6	Vietnam	1 541	5.9
7	Uzbekistan	836	3.2

1320 World production was estimated equal to 25 629 000 tonnes

1321 Source: International Cotton Advisory Committee website, available at [this link](#). Last visited on 13 December 2024

1322 As mentioned in Section 3.1.1, the ESPR establishes two product aspects that address recycled material: recycled
 1323 content and possibility of recycling. Within this framework, information about current recycled material and
 1324 recycling plants is crucial for the potential future development of requirements within these two product
 1325 aspects.

1326 The current global availability of recycled fibres is very limited (**Table 21**). The highest share of recycled
 1327 material is available for polyester (15%) and wool (6%) fibres. However, almost all recycled polyester fibres
 1328 come from recycling of plastic bottles, which are made of a specific type of polyester that is called polyethylene
 1329 terephthalate (PET) (Textile Exchange, 2022a). From 2020 to 2023 the estimates of recycled fibres were
 1330 relatively constant (**Table 21**).

1331 **Table 21.** Estimated percentages (%) of recycled fibres in recent years

Fibre	2019	2020	2021	2022
Polyester (PES)	14	15	15	14
Wool	NA	6	6	7
Polyamide (PA)	NA	2	2	2
Cotton	NA	0.96	1	1
MMCF	NA	0.4	0.5	0.5

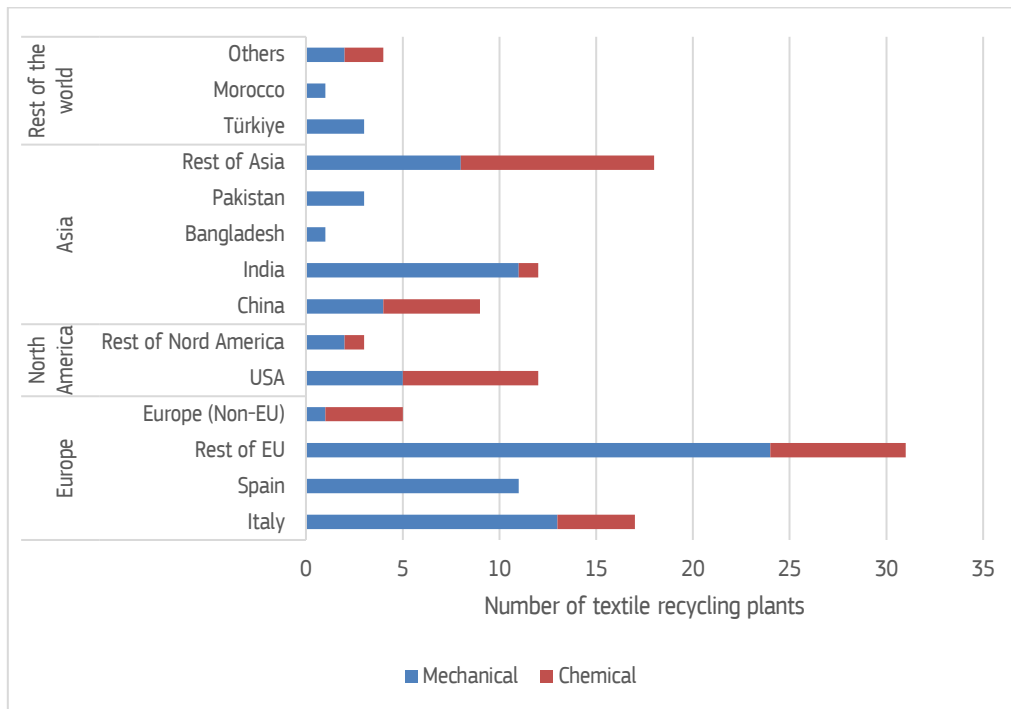
1332 N.B. Approximately 99% of the polyester recycled fibres come from plastic bottles made of polyethylene terephthalate (PET).

1333 Source: Own elaboration based on Textile Exchange (2020), DG GROW (2021b), Textile Exchange (2021), Textile Exchange (2022), Textile
 1334 Exchange (2023)

1335 The current availability of textile recycling plants was investigated in terms of location, technologies, possible
 1336 input fibres and scale of the plants (pilot or full scale). **Figure 14** shows the location of these 130 recycling
 1337 plants, highlighting consuming and producing countries (see Sections 5.1 and 5.3). Europe and North America,
 1338 which are the largest consumers, host about 50% and 11% of the global textile recycling plants, respectively.
 1339 Europe hosts mainly mechanical recycling plants, whereas North America mostly has chemical recycling plants.
 1340 Italy and Spain are the largest EU producers and the countries with the largest number of textile recycling
 1341 plants. Asia, which is the continent producing the most global apparel, has 33% of the textile recycling plants.
 1342 In particular, China and India, the world's largest producers, host only 7% and 9% of the global textile recycling
 1343 plants. **Figure 14** shows that there are currently more textile recycling plants in countries that consume the
 1344 most apparel.

1345

Figure 14. Current number of textile recycling plants classified by location



1346

1347

1348

Source: own elaboration based on Airtable - Sorting for Circularity - Recyclers Database ⁽⁹⁷⁾, (Jørgensen et al., 2022; Textile Exchange, 2022a)

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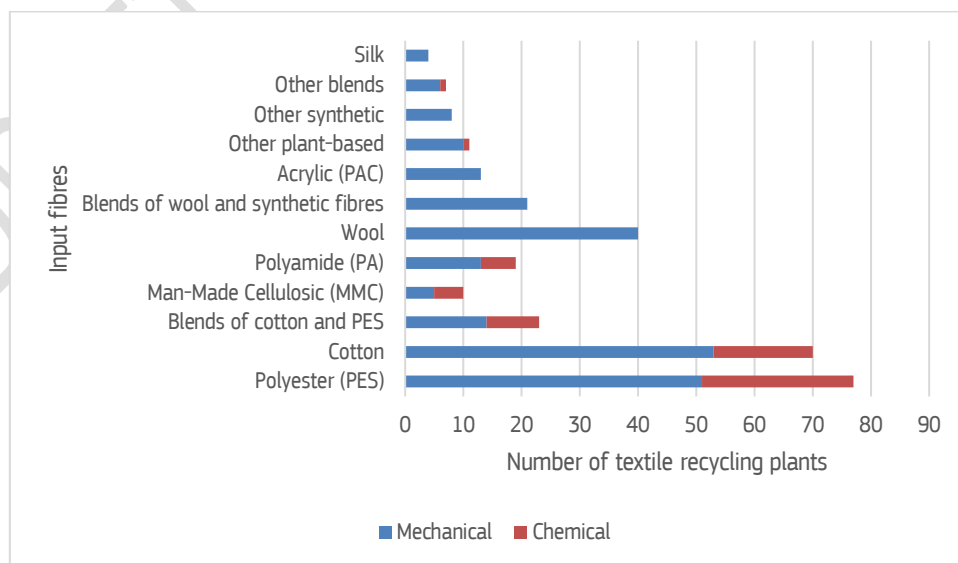
Figure 15 shows that some recycling plants are already capable of processing textile products made of many textile fibres. **Figure 15** shows that most of the investigated recycling plants are capable of processing polyester and cotton fibres, as well as wool fibres. Additionally, **Figure 16** shows that most of the recycling plants are full-scale facilities. This is in line with the availability of recycled fibres reported in **Table 21**.

1353

More detailed data about current textile recycling plants is available in Section 10.5.1.

1354

Figure 15. Current number of textile recycling plants classified by input fibre

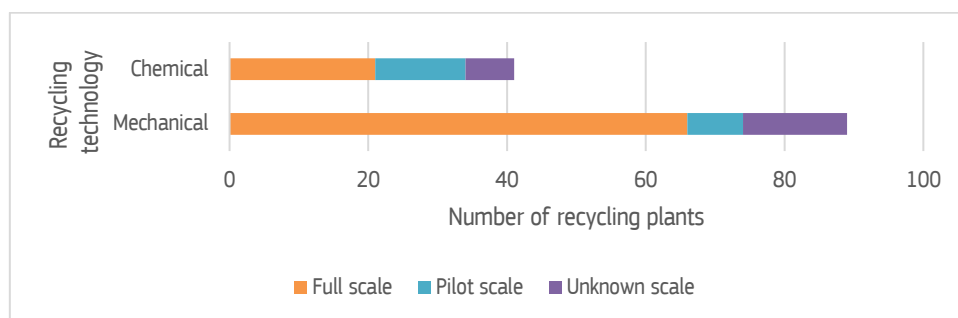


1355

⁹⁷ Airtable - Sorting for Circularity - Recyclers Database. Available at [this link](#). Last accessed on 31 January 2024.

1356 Source: own elaboration based on Airtable - Sorting for Circularity - Recyclers Database ⁽⁹⁸⁾, (Jørgensen et al., 2022; Textile Exchange,
 1357 2022a)

1358 **Figure 16.** Scale of current textile recycling plants



1359 Source: own elaboration based on Airtable - Sorting for Circularity - Recyclers Database ⁽⁹⁹⁾, (Jørgensen et al., 2022; Textile Exchange,
 1360 2022a)
 1361

1362 A recent study of the Joint Research Centre of the European Commission estimated that in the EU approximately
 1363 30% of the used and sorted textiles (0.55-0.60 Mt yr⁻¹) are sent for recycling. The resulting recycled fibres are
 1364 mainly used for cleaning wipes, non-woven material and insulation material, due to the fact that the most
 1365 abundant resulting recycled material is represented by non-spinnable fibres. In the EU, recycled material comes
 1366 from post-industrial waste, which represents only 11% of all textile waste (Huygens et al., 2023).

1367 **Table 22** reports the current fibre composition of EU textile waste, which is mainly made up of cotton and
 1368 polyester. **Figure 17** shows the composition of single textile products, which are mainly made of blends of two
 1369 or more fibres. The current EU recycling capacity is estimated to be equal to 0.7-0.85 Mt yr⁻¹; whereas the
 1370 future projection for 2030-2035 is for it to reach 1.2 - 2.7 Mt yr⁻¹, based on the assumption that the textile
 1371 industry is expected to generate more waste despite the future regulations in place. Based on the future
 1372 projections for 2030-2035, a 30% increase in textile waste is expected, along with more sorting capacities,
 1373 increased energy recovery and a reduction in landfilling. The majority of the future textile recycling capacity it
 1374 is estimated to be based on mechanical recycling, while lower volumes are claimed by operators using chemical
 1375 recycling (Huygens et al., 2023).

1376 **Table 22.** Material composition of EU post-consumer textile waste

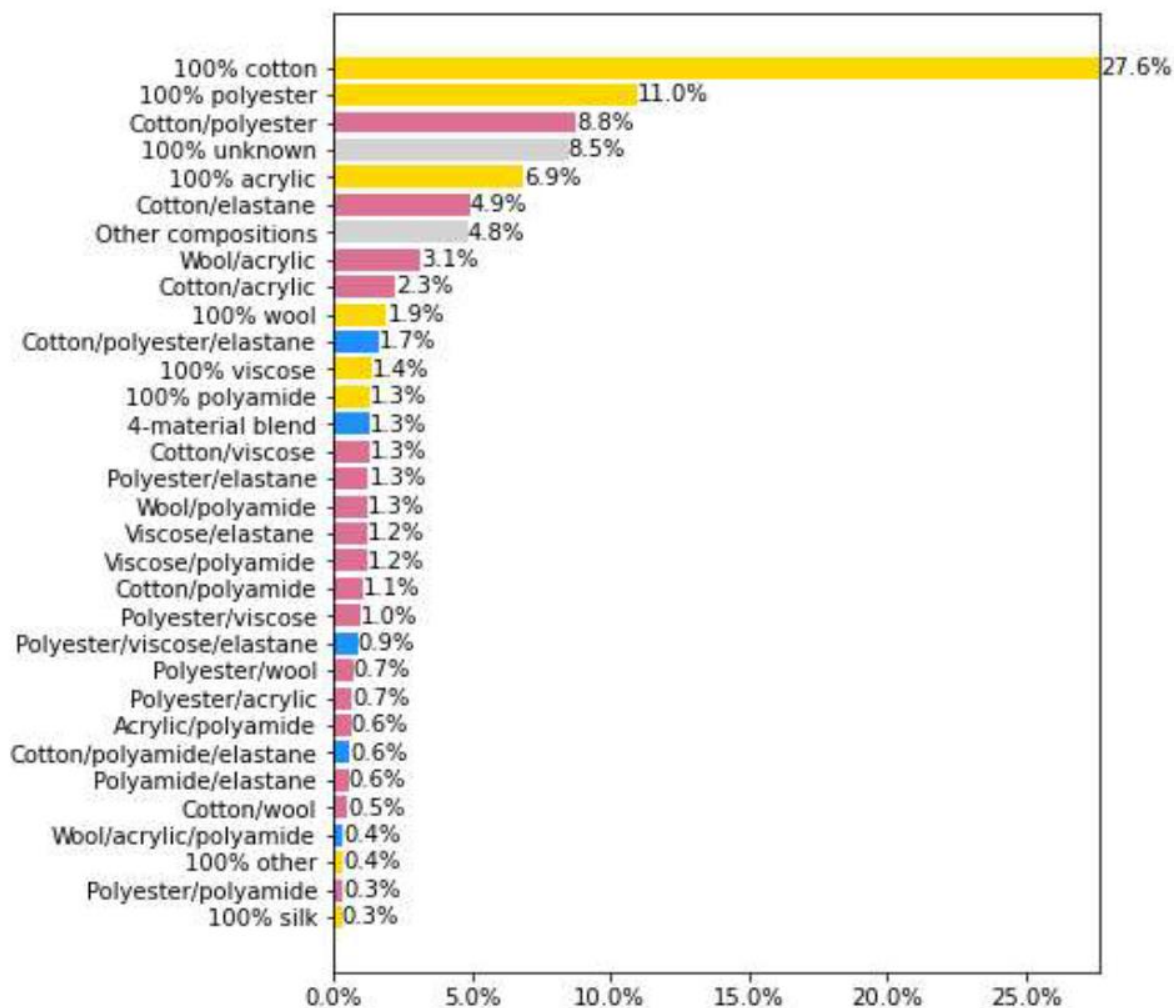
Material	Percentage in the waste fraction (%)
Cotton	34
Polyester	29
Polyamide	7
Wool, polypropylene, acrylic	30
Non-textile	11

1377 Source: Huygens et al. (2023)

⁹⁸ Airtable - Sorting for Circularity - Recyclers Database. Available at [this link](#). Last accessed on 31 January 2024.

⁹⁹ Airtable - Sorting for Circularity - Recyclers Database. Available at [this link](#). Last accessed on 31 January 2024.

Figure 17. Composition of textile products



1379

1380 Analysis of textile products incoming to sorting facilities. The sample was composed of about 73% of apparel, 9% of home/interior
 1381 textiles, 9% of footwear, and 9% of unclassified items. The colour code marks with yellow mono-fibre products, pink the blends of
 1382 two fibres, and blue the blends with two or more fibres.

1383

Source: (Refashion, 2023)

1384 **5.4.2 Chemicals**

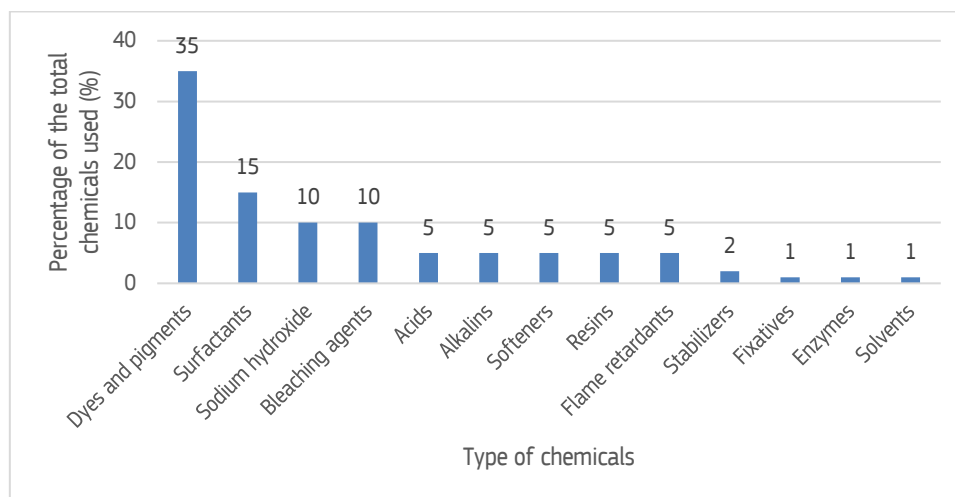
1385 The chemical demand of the textile industry is estimated to use about 25% of the global chemical production,
 1386 which in 2021 was equal to 9.3 million tonnes (Prasannamedha and Senthilkumar, 2021; Raj et al., 2022).

1387 The Ellen MacArthur Foundation estimated that the textile industry uses approximately 43 million tonnes of
 1388 chemicals per year. In particular, the production of 1 kg of cotton requires 0.35–1.5 kg of chemicals, and the
 1389 production of 1 kg of synthetic fibre requires 0.11–0.82 kg of chemicals, besides the polymers making the fibre
 1390 itself (Ellen MacArthur Foundation, 2017). In general, the manufacturing of 1 kg of apparel usually requires 1–
 1391 4 kg of chemicals. This range is relatively large because it depends on the type of apparel, the efficiency of the
 1392 supply chain, and the processes used for production (Muthu, 2020).

1393 **Figure 18** shows the chemicals most commonly used by the textile industry. Dyes and pigments, surfactants,
 1394 caustic soda, and bleaching agents represent 35%, 15%, 10% and 10% of the total consumption, respectively.
 1395 These four types of chemicals represent about 70% of the total chemicals used (Rahman et al., 2023).

1396

Figure 18. Share of the most commonly used chemicals in the textile industry



N.B. Sodium hydroxide is the caustic soda. Resins are formaldehyde-based.

Source: Own elaboration based on (Rahman et al., 2023)

1397

1398

1399

1400 According to the UN COMTRADE database⁽¹⁰⁰⁾ and the Observatory of Economic Complexity (OEC)
 1401 database⁽¹⁰¹⁾, the largest global exporters of dyes, identified with HS 32⁽¹⁰²⁾ of the Harmonized System, are
 1402 Germany, China and the USA, representing about 15%, 10% and 9% of the global exports (**Table 23**).

1403 **Table 23.** Largest exporters of dyes in 2019

Reporter country	Trade value (m USD)	Share of the global market (%)
Germany	13 036.6	15.6
China	7 719.9	10.2
USA	7 548.3	9.22
Japan	4 624.0	5.92
Netherlands	4 474.6	4.91
India	3 504.3	4.52
United Kingdom	3 450.8	4.14
Italy	3 430.6	4.08
Spain	2 995.8	3.71
Belgium	2 631.8	3.38
Republic of Korea	2 352.4	2.88
Other Asia	1 409.9	1.72

1404 Dyes are identified with the harmonised Standard code HS 32.

1405 Source: elaboration based on UN COMTRADE database⁽¹⁰⁰⁾ and OEC database⁽¹⁰¹⁾

1406 5.4.3 Energy

1407 In 2004, the energy consumption in the global textile industry was estimated to be equal to 2% of the global
 1408 energy consumption. Additionally, the production of 1 kg of generic textile product was estimated to require
 1409 about 126 MJ (about 35 kWh) of energy (Muthu, 2015).

1410 **Table 8** in Section 3.3.1 reports that almost all the stages of the textile value chain require the use of energy.
 1411 Nevertheless, the manufacturing stages cover about 70-80% of the total life-cycle energy consumption (Sandin,
 1412 Roos, Spak, et al., 2019; Quantis, 2021).

¹⁰⁰ UN COMTRADE database. Available at [this link](#). Last accessed on 12 January 2024.

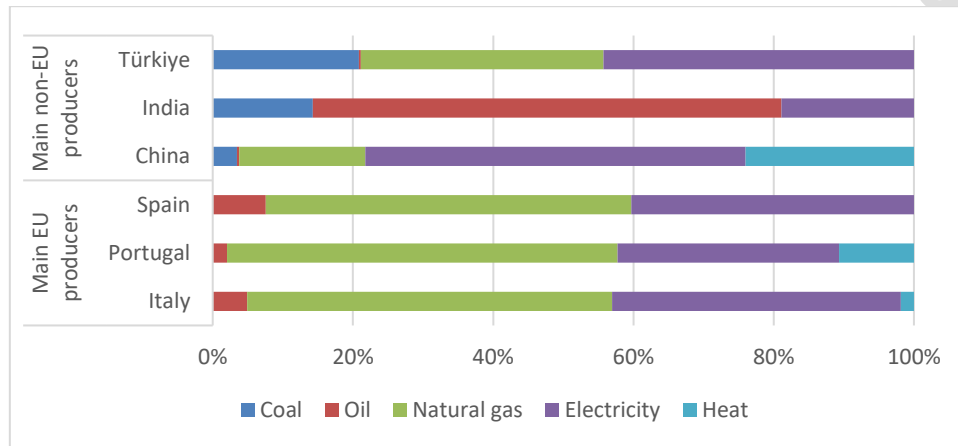
¹⁰¹ Observatory of Economic Complexity (OEC) database. Available at [this link](#). Last accessed on 12 January 2024.

¹⁰² HS 32: 'tanning or dyeing extracts; tannins and their derivatives; dyes, pigments and other colouring matter; paints, varnishes; putty, other mastics; inks'

1413 The energy consumption largely varies according to the country where the textile production process occurs,
 1414 and its impacts depend on the energy source used (Hasanbeigi and Price, 2012; Muthu, 2020). Figure 19 reports
 1415 the energy balance of the textile and leather industries of the main producers inside and outside the EU.
 1416 Meanwhile, **Figure 20** shows the electricity generation by source of the same countries. Both figures show that
 1417 the energy used in the EU has a very different composition to the energy used outside the EU. The energy used
 1418 in China and India is mainly generated with coal and oil, which are known to be more polluting than natural gas
 1419 and other sources of energy.

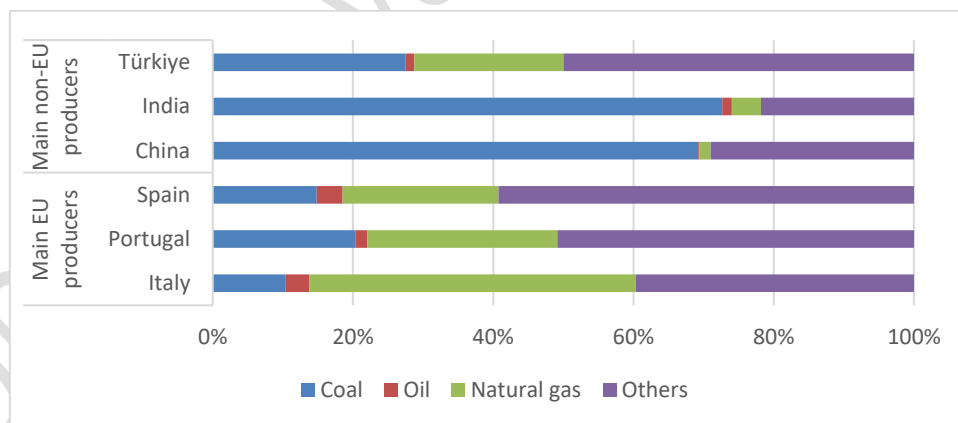
1420 Specific stages of textile production consume different amounts of energy (Muthu, 2015; Muthu, 2020; Roth et
 1421 al., 2023). These aspects will be detailed in the following milestone, when the PS addresses tasks 4 (Section 9)
 1422 and task 5 of the MEErP.

1423 **Figure 19.** Energy balance of the textile and leather industries in 2021



1424 Source: own elaboration based on IEA World Energy Statistics and Balances ⁽¹⁰³⁾

1426 **Figure 20.** Electricity generation by source



1427 N.B. The group 'Others' includes nuclear power, hydropower and renewable sources.

1428 Source: own elaboration based on IEA (2019)

1430 In the manufacture of apparel, the cost of energy also plays an important role. As already mentioned in Section
 1431 5.1, the increase of the cost of energy in the EU in 2022 negatively affected the Union's textile production.
 1432 **Table 24** reports the price of electricity for the countries where most of the production and consumption occurs.
 1433 The data gathered report that the electricity price at industrial scale is more expensive in the EU than in China
 1434 and India.

¹⁰³ IEA World Energy Statistics and Balances (database). Available at [this link](#). Last accessed on 10 February 2024.

1435 **Table 24.** Electricity prices for selected countries for the base year 2019

Country	Residential - Electricity price (USD/MWh)		Industrial - Electricity price (USD/MWh)	
	2012	2022	2010	2022
China	NA	82.32	NA	88*
India	69.66	NA	105.51	NA
Türkiye	184.14	89.52	150.92	204.51
EU-27*	227.1	NA	160.38	NA
USA	115.77	150.89	67.89	83.69
Japan	243.76	NA	162.11	NA
Republic of Korea	101.73	106.81	75.65	104.81

1436 N.B. NA: Not available.

1437 Source: UN COMTRADE database ⁽¹⁰⁴⁾ and * Global petrol prices ⁽¹⁰⁵⁾

1438 5.4.4 Water

1439 **Table 8** in Section 3.3.1 reports that many stages of the textile value chain require the use of water.

1440 The water demand of the textile industry was estimated to be equal to about 79 billion m³ per year. Most of
1441 this water is attributed to cotton production. In general, the manufacture of 1 tonne of textiles is associated
1442 with the consumption of 200 tonnes of fresh water (Niinimäki et al., 2020).

1443 Cotton and hemp are the most water-demanding among the textile fibres; whereas polyester and polypropylene
1444 need the least water for their production (**Table 25**). Among the manufacturing processes, the finishing
1445 processes are the most demanding, requiring between 40 l kg⁻¹ and 80 l kg⁻¹ of fabric (Roth et al., 2023). More
1446 details will be provided in the following milestone, when the PS addresses tasks 4 (Section 9) and task 5 of the
1447 MEErP.

1448 **Table 25** Water consumption of fibres

Fibre	Water consumption (l/kg of fibre)
Cotton	1 559
Wool	530
Man-made cellulosic fibres	92
Hemp	89
Polyester	51 – 71
Nylon (known as polyamide)	185 – 633
Polyethylene and polypropylene (PP)	47 – 32
Acrylic	210
Viscose rayon	640

1449 Source: Muthu (2015), Muthu (2020), Niinimäki et al. (2020)

1450 Due to the large water demand of the finishing processes, the cost of water at industrial scale is a factor
1451 affecting its manufacture.

1452 **Table 26** reports the tap water price in several apparel-producing and -consuming countries. Assuming that the
1453 price difference between industrial and tap water has the same ratio worldwide, **Table 26** reports that the
1454 manufacturing of apparel in China and India can be performed with a lower water price than in Europe.

1455 **Table 26.** Tap water price for selected countries

Country (city)	Tap water price (EUR/m ³)
China (Shanghai and Beijing)	0.36-0.68
India (Bangalore)	0.24
Turkey (Istanbul)	0.85
Europe (cities from 24 countries)	2.80
USA (30 cities)	2.23
Japan (Tokyo)	1.58
Republic of Korea (Seoul)	0.77

¹⁰⁴ UN COMTRADE database available at [this link](#). Last accessed on 15 December 2023.

¹⁰⁵ Global Petrol Prices, available at [this link](#). Last accessed on 15 December 2023.

1456 N.B. Reference year 2019, with the latest updates in 2021.

1457 *Source: Tap water price index ⁽¹⁰⁶⁾ and Eur Eau (2020)*

1458 **5.5 Market structure and business models**

1459 **Composition**

1460 EU companies in the textile value chain are mostly microenterprises, covering all manufacturing stages (**Table**
1461 **27**). However, medium and large enterprises generate most of the total turnover (**Table 28**).

1462 After the manufacturing stages, textile apparel go through wholesalers and subsequently retailers ⁽¹⁰⁷⁾, enabling
1463 their placing on the market and their making available on the market for the first time. In the textile and apparel
1464 sector, wholesalers are understood as companies that sell products to other companies in large quantities and
1465 at low prices, whereas retailers are companies that sell in small quantities and generally with higher prices than
1466 wholesalers. In the EU, retailers in the apparel sector are constituted by a bigger number of enterprises, generate
1467 higher turnover, higher production value, and employ more people than wholesalers of apparel and footwear
1468 together (**Table 29**). Among the top 120 players of the EU textile ecosystem, 50 are retailers of fashion
1469 products and about 38 are wholesalers and agents for fashion products (DG GROW, 2021a).

1470 **Table 27.** Share of the number of EU-27 enterprises per NACE group in 2021

Size of enterprises	Economic activity			
	Preparation and spinning of textile fibres [C131] (%)	Weaving of textiles [C132] & finishing of textiles [C133] (%)	Manufacture of other textiles [C139] (%)	Manufacture of wearing apparel, except fur apparel [C141] & Manufacture of knitted and crocheted apparel [C143] (%)
Microenterprises (from 0 to 9 employees)	80 (p)	85 (p)	92 (p)	95 (p)
Small enterprises (from 10 to 49 employees)	13 (ep)	9 (p)	6 (p)	3 (p)
Medium enterprises (from 50 to 249 employees)	6 (p)	6 (p)	2 (p)	2 (p)
Large enterprises (more than 250 employees)	: (c)	2 (pu)	0.3 (p)	0.2 (pu)

1471 N.B. Data from relevant countries like Italy is missing in all the indicators.

1472 p: provisional; ep: estimated, provisional; c: confidential; pu: provisional, unreliable or uncertain data with estimation error from ±1% to
1473 ±5%; ":" not available.

1474 *Source: own elaboration based on EUROSTAT SBS_SC_OVW ⁽¹⁰⁸⁾*

¹⁰⁶ Water Price Index. Available at [this link](#). Last accessed on 11 February 2024. Water Price Index examines and interprets the prices of tap water and bottled water in 120 cities globally. It presents the actual average expenditure for usage and the percent difference of the price from the median value of the dataset in each respective location. The factor 'Tap Water Price (EUR/m³)' refers to the monthly cost for 1 cubic metre of tap water, as indicated by the most recent applicable rate from the database of the International Benchmarking Network for Water and Sanitation Utilities (IBNET), which is available at [this link](#) (last accessed on 11 February 2024).

¹⁰⁷ According to the Cambridge dictionary: (1) a wholesaler is a buyer and seller of goods in large amounts to shops and businesses; (2) retailer is a person, shop, or business that sells goods to the public.

¹⁰⁸ Enterprise statistics by size class and NACE Rev. 2 activity (from 2021 onwards). Available at [this link](#).

1475 **Table 28.** Share of the turnover of EU-27 enterprises per NACE group in 2021

Size of enterprises	Economic activity			
	Preparation and spinning of textile fibres [C131] (%)	Weaving of textiles [C132] & finishing of textiles [C133] (%)	Manufacture of other textiles [C139] (%)	Manufacture of wearing apparel, except fur apparel [C141] & Manufacture of knitted and crocheted apparel [C143] (%)
Microenterprises (from 0 to 9 employees)	10 (p)	7 (p)	13 (p)	19 (p)
Small enterprises (from 10 to 49 employees)	15 (p)	8 (p)	10 (p)	15 (p)
Medium enterprises (from 50 to 249 employees)	48 (p)	41 (p)	44 (p)	28 (p)
Large enterprises (more than 250 employees)	27 (p)	45 (p)	33 (p)	38 (p)

1476 N.B. Data from relevant countries like Italy is missing in all the indicators. Italy is the EU country with the highest turnover and employment
 1477 share compared with other MS in 2021 (EURATEX, 2022a). In this context, the data presented are indicative but not precise data.

1478 p: provisional.

1479 Source: own elaboration based on EUROSTAT SBS_SC_OVW ⁽¹⁰⁸⁾

1480 **Table 29.** Description of wholesalers and retailers in 2020, according to NACE classes

Economic parameter	Economic activity	
	Wholesale of clothing and footwear [G4642]	Retail sale of clothing in specialised stores [G4771]
Number of enterprises	52 212	262 403
Turnover (m EUR)	120 758.3	139 012.2
Production value (m EUR)	46 047.5	65 744.7
Number of employees	294 255	1 155 453

1481 Source: own elaboration based on data from EUROSTAT SBS_NA_DT_R2 ⁽¹⁰⁹⁾.

1482 Besides numerous SMEs, the fashion industry includes large companies, which are usually active in many
 1483 subsectors of the textile ecosystem, as a consequence of acquisitions and mergers, as well as subcontracting
 1484 and outsourcing. The largest groups in the fashion industry include several brands, which supply diverse end
 1485 markets or propose different product lines that go beyond apparel and footwear. Other companies function
 1486 under a single brand, but still with a variety of products (DG GROW, 2021a).

1487 Some large companies are vertically integrated, meaning made up of large groups that design, manufacture
 1488 and sell a variety of products. Nevertheless, acquisitions, mergers, subcontracting and outsourcing strongly
 1489 define the textile apparel market in a global value chain. The majority of the most important EU companies are
 1490 also world players that manufacture, innovate and sell across the globe and acquire (and are acquired by) other
 1491 world players (DG GROW, 2021a).

1492 Drawing the boundaries of the EU textile apparel market is not possible because it fully operates in the global
 1493 market and value chains. Some important EU companies play a role in distribution, but they are not
 1494 manufacturers in the EU. Many of them own hundreds (and in a few cases thousands) of subsidiaries outside
 1495 the EU, which are responsible for production and/or retail. At the same time, subsidiaries of non-European
 1496 companies are also frequently considered important players in the EU (DG GROW, 2021a).

1497 A recent analysis of the top 120 main players in the EU textile ecosystem identified four broad classes of
 1498 companies (DG GROW, 2021a):

- 1499 — high-end luxury brands;
- 1500 — manufacturers and retailers producing mid- and low-end products;
- 1501 — manufacturers of intermediate textile products;

¹⁰⁹ Annual detailed enterprise statistics for trade (NACE Rev. 2 G). Available at [this link](#).

1502 — companies specialised in the manufacturing of specific goods.

1503 **General business models**

1504 Companies in the fashion industry follow different models in relation to the intangible value of the product and
1505 the management of its supply chain. As described in Section 3.1.1, textile apparel are products with physical
1506 and symbolic functionalities. Besides the tangible quality of the manufacturing process, textile apparel must
1507 meet symbolic and aesthetic values, known as intangibles. Since these intangibles change rapidly, companies
1508 working in the textile apparel industry try to gain value via the supply chain, reacting efficiently to the
1509 unpredictable changes in consumer tastes and demands. Within this context, textile apparel companies
1510 inevitably rely on outsourcing to compete in the rapidly changing market (DG GROW, 2021a). The reasons of
1511 the rapid change of consumer taste and demand are further investigated in (Section 9), where business models
1512 and user behaviour are analysed in the context of all relevant product aspects reported in Article 5 of the ESPR.

1513 Regarding the integration of manufacturing and intangibles, two main models can be identified in the textile
1514 apparel industry (DG GROW, 2021a):

1515 — **Consumer-led operation model**, where the requests of the consumer are the centre of the
1516 business model. There is a huge effort to collect customer feedback, and produce what is desired
1517 by the market. In this model, consumers dictate the terms of production and affect the whole
1518 supply chain.

1519 — **Brand-led operation model**, where the brand dictates the design and manufacture. There is a
1520 huge effort in strategies and programmes to promote the interest in the brand.

1521 Two other main models can be identified regarding the approaches to the supply chain (DG GROW, 2021a):

1522 — **Integrated approach**, where the production is entrusted to internal suppliers and the logistics
1523 aims to quickly react to customer's demands.

1524 — **Centralised approach**, where the production is mostly outsourced, and supported by audit and
1525 quality control programmes, which could eventually change contractors.

1526 Companies also apply hybrid forms of these models.

1527 **Distribution, retailing and e-commerce**

1528 According to McKinsey & Company ⁽¹¹⁰⁾, the distribution and retailing channels in the fashion industry are mainly
1529 controlled by fashion brands and retailers. **Table 30** describes the main distribution and retail models of
1530 companies selling textile apparel.

1531 **Table 30.** Distribution and retail models of apparel companies

Brand		Retailer	
Only direct to consumer: Fashion brands that cover various stages within the fashion value chain, beyond being solely an apparel brand. This includes managing their own retail operations and potentially establishing their own e-commerce presence, all while avoiding wholesale distribution. (Vertically integrated apparel player)	Mix wholesale/direct to consumer: Apparel brand that sells both directly to consumers (in physical stores and/or e-commerce) and to other retailers. (Hybrid apparel player)	On- and offline: multi-brand retailer with its own brands, typically with a physical store and an online store. (Multibrand retailer)	Only online: Online retailer offering a variety of brands, including its own. (Multibrand pure e-commerce retailer)

1532 *Source: Reported from McKinsey & Company ⁽¹¹⁰⁾.*

1533 In the last few years, e-commerce has been rapidly increasing, especially for online market places and multi-
1534 brand retailers (DG GROW, 2021a). In particular, the EEA used the EUROSTAT database to report a steady
1535 increase in the percentage of individuals purchasing online apparel and footwear between 2020 and 2022
1536 (Duhoux et al., 2024). In 2009, the percentage of textile and apparel turnover generated by e-sales was equal
1537 to 5% of the total. In the following years, it gradually increased up to 11% in 2020 (EURATEX, 2022a).

¹¹⁰ McKinsey & Company webpage on Retail. – Measuring the fashion world. Achim Berg, Miriam Lobis, Elizabeth Hunter, Felix Rölkens, Patrick Simon, and Hannah Yankelevich. Available at [this link](#). Last accessed on 10 December 2023.

1538 **Second-hand and rental markets**

1539 Second-hand and rental of textile apparel are experiencing fast growth, but are still at the very first stages of
1540 development. Their future success requires the adoption of business models based on collaborative
1541 consumption practices, e.g. utility-based non-ownership, and redistributed ownership of textile apparel. The lack
1542 of consumer awareness is seen as a barrier to the development of these two markets. For the second-hand
1543 market, other barriers are the limited durability of clothes and the need for traceability and guarantee of
1544 authenticity (DG GROW, 2021a).

1545 Figures about the second-hand market are limited. According to RREUSE⁽¹¹¹⁾, in 2022, about 17 of their
1546 members were involved in the collection, sorting, and reuse of used and waste textiles. Members of RREUSE
1547 collect 360 000 tonnes of textiles annually, of which about 15% is reused locally. RREUSE estimates that a
1548 social enterprise employs between 20 and 35 people per 1 000 tonnes of textile waste collected. The same
1549 organization counts about 2 400 second-hand stores across the EU and beyond.

1550 **5.6 Characteristics of the value chain**

1551 The value chain of textile apparel is defined as global, long, complex, fragmented and opaque (Cai and Choi,
1552 2020; UNECE and UNTRADE, 2020; Brondino, 2022).

1553 The nodes of the value chain could be divided into two parts:

1554 (a) a first part including the life-cycle stages from raw material for fibre production until retailing,
1555 when the product is placed on the market and it is made available on the market for the first
1556 time,

1557 (b) a second part including use phase and waste management.

1558 The first part of the value chain is composed of at least 15 nodes, i.e. the production of an item of textile
1559 apparel involves at least 15 economic operators via the production of raw materials, manufacturing and
1560 retailing operations. Companies placing products on the market do not know the full story behind their products
1561 – they do not know which were the economic operators involved over the whole supply chain and the processes
1562 and material/chemicals used. Most of the companies in the value chain can get information from their
1563 immediate suppliers, but usually information is lost about suppliers further upstream (UNECE and UNTRADE,
1564 2020). This part of the value chain is highly interconnected with nodes spread worldwide at all stages (UNEP,
1565 2020)⁽¹¹²⁾. Although there are specific countries producing specific fibres, most fibres can be supplied from
1566 many parts of the world and mixed together (Textile Exchange, 2022a). Fibre processing as well as yarn spinning
1567 and fabric manufacturing occur in several countries and use resources, e.g. chemicals, which are produced in
1568 third countries. This was also shown in **Figure 3** and **Figure 4** in Section 5.1.

1569 This description of the first part of the value chain shows that the manufacturing origin of textile apparel should
1570 not refer to just one country, but it should refer to the many countries where the main production stages
1571 occurred.

1572 Usually, the textile apparel market mainly includes multinational companies based in developed countries that
1573 act as retailers or as producers and retailers. These multinational companies generally outsource production in
1574 developing countries due to the lower production costs (Brondino, 2022). For the first four stages of the
1575 product's life cycle (see **Figure 1** and **Table 8**), developing countries offer the possibility to produce textile
1576 apparel facing lower environmental compliance costs than in developed countries (see Section 5.7). Similar
1577 conditions occur for the confectioning stage, which is very labour-intensive: developing countries offer cheaper
1578 labour costs than developed countries (UNECE and UNTRADE, 2020).

1579 Some studies envisage the possibility of reshoring and/or nearshoring production to developed countries,
1580 brought about by increased automation. However, this process is expected to happen only in the long term and
1581 subject to the sector investing strongly in this direction (Brondino, 2022).

¹¹¹ RREUSE website. Available at [this link](#). Last accessed on 13 December 2025. Reported figures were shared during consultation with stakeholders.

¹¹² An exchange with a large global economic actor revealed that a retailer/producer could have more than 1 700 suppliers, which may have more than 8 200 factories located in 50 supply markets.

1582 The textile apparel industry has always operated according to seasons, which are associated with the release
1583 of new collections. Over the last decades, the number of seasons has been drastically increasing from two per
1584 year to almost one per week⁽¹¹³⁾. This seasonality largely affects the supply chain, from procurement to
1585 manufacturing capacity, planning and inventory management.

1586 Within this framework, the first part of the value chain evolves among global dynamics, consumer demands
1587 and the strategies of big retailers (Ellen MacArthur Foundation, 2017; UNECE and UNTRADE, 2020; Brondino,
1588 2022)

1589 In order to increase transparency in the textile apparel value chain, in 2019 the United Nations Economic
1590 Commission for Europe (UNECE) launched a project for an international framework initiative to enhance
1591 transparency and traceability for sustainable value chains in the garment and footwear industry⁽¹¹⁴⁾.

1592 The second part of the value chain is mainly constituted by the post-consumer textile waste treatment market
1593 and by the second-hand market (reuse). The European Environment Agency and the United Nations provide
1594 figures about used textiles, mainly textile apparel, exported outside the EU (Lingås et al., 2023; UNECE and
1595 ECLAC, 2024). Used textile apparel is part of a specialised and traded global value chain. Over the last two
1596 decades, the export of used textiles from the EU has tripled from about 550 000 tonnes in 2000 to almost
1597 1 700 000 tonnes in 2019. These products can have several fates. Usually, what is exported to Africa is first
1598 screened in local markets and subsequently most is dumped via informal waste streams. Used textiles reaching
1599 Asia are usually down-cycled into industrial rags or filling, or re-exported for recycling in other Asian countries
1600 or are further sent to Africa for reuse. Products that cannot be recycled or re-exported are likely to end up in
1601 Asian landfills (Lingås et al., 2023; UNECE and ECLAC, 2024).

1602 **5.7 Competitiveness and environmental compliance costs**

1603 The global value chain of textile apparel produces most of its environmental impacts in the production stages
1604 (**Table 9**). Usually, the production stages occur in Asian countries (**Figure 4**). This implies that most of the
1605 negative emissions to the environment occur outside the EU (**Table 6**), in particular in countries that allow
1606 production at lower costs due to poor labour conditions and less stringent measures about environmental
1607 protection (UNECE and UN TRADE, 2020).

1608 A recent analysis performed by the OECD investigated the requirements set by several frameworks establishing
1609 Best Available Techniques (BAT) for Preventing and Controlling Industrial Pollution (OECD, 2022). This
1610 publication aimed to gather information on existing BAT reference documents (BREFs) that could stimulate
1611 more countries to implement specific requirements in their territories. **Table 31** reports the comparison of
1612 environmental aspects that are addressed by several BREFs implemented around the world. The analysis
1613 showed the following:

1614 — Comparison is made difficult by the different approaches used by each BREF, in terms of key
1615 environmental indicators and stages of production.

1616 — The EU has the most ambitious mandatory system, covering almost all the environmental aspects
1617 (7 out of 8).

1618 — Among the largest global producers, the BREFs applied in China and India were analysed⁽¹¹⁵⁾. Both
1619 China and India set limits for fewer environmental aspects than the original EU BREF. In particular,
1620 India addresses only emissions to water, with less stringent thresholds than the EU BREF. The
1621 Chinese BREF addresses more environmental aspects than India (4 out of 8), but it sets less
1622 stringent values for emissions to water compared to the EU BREF (**Table 79** in Section 10.5.1).
1623 Comparison with values related to emissions to air was not possible due to the different practices
1624 and key environmental indicators used by the several schemes.

¹¹³ Numerous fashion websites report this information. Some of them are: (1) [Digitally Empowering Fashion](#), (2) [InStyle](#), and (3) [techfashionista](#). All websites were last visited on 7 December 2023. The exchange with a large global retailer revealed that this company updates their collections every week to satisfy the requests of their customers.

¹¹⁴ UNECE - Traceability for Sustainable Garment and Footwear. Available at [this link](#). Last accessed on 7 December 2023.

¹¹⁵ Information about the Minimum National Standard (MINAS) from India was included in the analysis provided by OECD (2022). Meanwhile, the analysis of the Chinese BREF was performed thanks to a machine translation of the document found on the internet.

1625 In this context, it is evident that companies producing textile apparel, or their intermediate products, in the EU
 1626 must face higher costs than companies producing in China and India due to prevention/reduction of emissions
 1627 into the environment set by the EU BREF, within the framework of the EU Industrial Emissions Directive (¹¹⁶).

1628 **Table 31.** Environmental aspects covered by the Best Available Techniques (BAT) reference documents (BREFs) for
 1629 preventing and controlling industrial pollution around the world

Country/organisation Environmental aspects	European Union (EU BREF)	China	India (MINAS)	South Korea	United States (US EPA)	World Bank (EHS Guideline)
Emissions to air	Yes	Yes	No	Yes	Yes (*)	No
Emissions to water	Yes	Yes	Yes	Yes	Yes	Yes
Consumption of energy	Yes	No	No	No	No	Yes
Water usage	Yes	No	No	Yes	No	No
Waste generation	Yes	Yes	No	No	No	Yes
Usage and management of chemicals	Yes	No	No	No	No	No
Energy efficiency	Yes	No	No	Yes	No	No
Noise emission	No	Yes	No	Yes	No	No

1630 N.B. MINAS: Minimal National Standard; US EPA: United States Environmental protection Agency; EHS Guideline: World Bank Group
 1631 Environmental, Health, and Safety Guidelines.

1632 (*) Covered by the Clean Air Act, National Emission Standards for Hazardous Air Pollutants (NESHAP) (OECD, 2022).

1633 Source: (Ministry of Ecology and Environment, China, 2021; OECD, 2022).

1634 China implemented its scheme on available pollution prevention and control techniques for the textile
 1635 industry (¹¹⁷) in 2021, but it was not included in the analysis of OECD (2022).

1636 Besides the above-mentioned aspects, the current competitiveness in the global textile value chain is also
 1637 influenced by the cost of energy, water and chemicals, as assessed in Section 5.4.3 and Section 5.4.4. Besides
 1638 the Industrial Emission Directive, EU industries must comply with requirements established by REACH (Section
 1639 4.1.1).

1640 5.8 Lifespan of textile apparel

1641 The apparent consumption in the EU-27 of textile apparel (**Figure 10** in Section 5.2) focuses on yearly market
 1642 data, which provide a good understanding of the amount of textile apparel traded over the years. Future steps
 1643 of the PS will focus on the economic and environmental assessment of textile apparel in the Union. This
 1644 assessment will take into account the use phase and therefore the lifespan of the products, which affects their
 1645 demand.

1646 The lifespan of a product can be measured according to different descriptors (Murakami et al., 2010). Table 32
 1647 lists the different lifespan descriptors used for textile apparel.

1648 **Table 32.** Types of lifespans

Type	Definition
Total lifespan	The period during which an item of textile apparel retains its original form, irrespective of its functional condition.
Service lifespan	The time an item of textile apparel remains functional and usable, considering its use by both the initial and subsequent owners. This timeframe initiates upon the product's acquisition by the first owner and concludes when the last owner disposes of it.
Possession span	The period of time in which an item of textile apparel is held by a specific owner. This timeframe does not discriminate whether the item of textile apparel is used subsequently by another person or it is disposed of.
Duration in use	The period of time a single owner utilises the item of textile apparel, considering only the use time (i.e. the time it is worn).
Physical lifespan	The period of time an item of textile apparel can be worn before it exhibits a level of wear beyond what is deemed acceptable.

¹¹⁶ Industrial Emission Directive. Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (Recast) (Text with EEA relevance). Available at [this link](#).

¹¹⁷ Chinese guidelines on available pollution prevention and control techniques for the textile industry. Available at [this link](#). Last accessed on 11 December 2023.

1649 *Source: adapted from Murakami et al. (2010)*

1650 The lifespan of textile apparel is affected by many factors related to the specific type of textile apparel, the
1651 intrinsic physical properties of the product, and the behaviour of the users. Textile apparel is worn and cleaned
1652 with different frequencies according to their specific use, material composition and user choices. This is because
1653 specific textile apparel has seasonal use, or are related to specific activities, like sports. Additionally, many
1654 textile apparel remain stored and not in use in wardrobes. More investigation about factors related to user
1655 behaviour are addressed in Section 6.

1656 The PS will focus on the service lifespan, which considers the time period from the purchase of the new item to
1657 its disposal, disregarding the number of users. Currently, there is no established system that allows the direct
1658 measurement of the service lifespan of textile apparel. The information available in the literature focuses on
1659 the possession span, which refers to the time a single user keeps the item, and the duration in use, which refers
1660 to how much time the owner uses the item (Table 32). This information is collected via surveys where users are
1661 asked to provide their estimates.

1662 The possession span of textile apparel is often expressed as number of years. The duration in use is expressed
1663 as 'days of wear'. **Table 33** and **Table 34** report data gathered from the literature, using both metrics for most
1664 of the textile apparel categories. **Table 81** in Section 10.5.3 reports a brief description of the investigated
1665 studies.

1666 The figures obtained from the analysis show a relatively large range of values, a consequence of the many
1667 factors affecting this parameter. The analysis addressed only specific products belonging to specific product
1668 categories. Section 10.5.3 provides additional, more granular information on the collected data.

1669 Users and experts perceive that over the last 20 years the service lifespan of textile apparel has decreased.
1670 Some experts estimated that it decreased by 36% (Ellen MacArthur Foundation, 2017). The lack of a direct
1671 measurement method does not allow the provision of a better understanding of this important parameter.
1672 Nevertheless, educated assumptions will be made to be used in the stock model that will be produced in the
1673 following milestone, when the PS addresses task 7 of the MEErP.

1674

1675

1676 **Table 33.** Possession span of textile apparel expressed in years

Textile apparel category	Gray et al. (2022)	Laitala and Klepp (2020)	Laitala et al. (2018)	WRAP (2017a)	Drycleaning Institute (2015)
1. T-shirts	4	4.6	3.3-6.8	4.5	NA
2. Shirts and blouses	4.1	4.8	3.3-7.2	5 (Shirts)	2-3
3. Sweaters and mid layers	4.4 (Sweatshirts and hoodies)	6	3.7-10.8	NA	3-4
4. Jackets and coats	6.2 (Non-padded) 5.4 (Padded)	7 (Coats) 6.8 (Jackets)	4-11.6 (Coats) 4-11.5 (Jackets)	NA	2-4
5. Pants and shorts	4.8 (Shorts) 4.3 (Trousers) 4.1 (Jeans)	4.7 (Pants) 3.5 (Jeans)	2.5-6.2 (Pants) 2.5-4.3 (Jeans)	4 (Jeans)	2-4
6. Dresses, skirts and jumpsuits	4.9 (Skirts) 4.6 (Dresses)	7.1 (Dresses) 6.9 (Skirts)	4.1-15.2 (Dresses and skirts)	NA	1-3 (Dresses) 2-4 (Skirts)
7. Leggings, stockings, tights and socks	3.8 (Leggings) 2.9 (Socks and hosiery)	2.6 (Socks)	1.8-3.6 (Socks)	2.5 (Socks)	1 (Socks)
8. Underwear	2.7	3.5 (Bras) 3.1 (Underpants)	2.4-4.4	NA	1-2
9. Swimwear	NA	NA	NA	NA	2
10. Accessories	NA	NA	NA	NA	1-2

1677 N.B. NA: Not available.

1678 Beton et al. (2014) reports that apparel has a lifespan between 1 and 3 years, based on expert opinions.

1679 Knitwear products were reported to have a possession span of 4.8 years (Gray et al., 2022) and 5 years (WRAP, 2017a).

1680 All investigated studies address specific products belonging to specific textile apparel categories.

1681 *Source: own production*

1682 **Table 34.** Duration in use of textile apparel expressed in days of wear

Textile apparel category	Roos et al. (2015)	WRAP (2017a)	Klepp et al. (2020)	PEFCR (2022)
1. T-shirts	22	112.5	90.5	45
2. Shirts and blouses	NA	80 (Shirts)	90.5	40
3. Sweaters and mid layers	NA	NA	90.5	85
4. Jackets and coats	100 (Jackets)	NA	90.5	100
5. Pants and shorts	200 (Jeans)	300 (Jeans)	90.5	70 (Jeans)
6. Dresses, skirts and jumpsuits	10 (Dresses)	NA	90.5	70
7. Leggings, stockings, tights and socks	NA	125 (Socks)	90.5	50 (Socks) 70 (Leggings/tights) 50 (Hosiery)
8. Underwear	NA	NA	90.5	60
9. Swimwear	NA	NA	NA	30
10. Accessories	NA	NA	NA	100

1683 N.B. NA: Not available.

1684 Days of wear of knitwear products were reported to be equal to 150 (WRAP, 2017a) and 90.5 Klepp et al. (2020).

1685 All investigated studies address specific products belonging to specific textile apparel categories.

1686 *Source: own production*

1687 **5.9 Market penetration of environmental labels**

1688 Although numerous environmental labels are used in the textile sector, currently there is no direct method to
 1689 quantify their market penetration. Therefore, it not possible to understand the real success of these labels and
 1690 the specific reasons behind their success.

1691 Such information could be helpful for the revision of the EU Ecolabel criteria for textile products. The following
 1692 milestone of the PS will address the potential inclusion of information requirements for products awarded with
 1693 one or more environmental labels. The required information could also include a description of the specific
 1694 environmental label in the Digital Product Passport.

1695 **6 User behaviour**

1696 **6.1 Introduction**

1697 The aim of this section is to present and analyse information available in the literature regarding behavioural
1698 trends among users with regards to apparel.

1699 The methodology used in the user behaviour analysis is twofold. First, a comprehensive screening and literature
1700 review of scientific papers and other studies on user behaviour related to apparel was conducted. The main
1701 goal of the systematic literature review was to identify the topics usually covered by studies on user behaviour
1702 regarding apparel. As a second step, several questions related to the most common aspects explored by user
1703 behaviour studies were prepared. These questions were included in the first stakeholder consultation through
1704 an online questionnaire ⁽¹¹⁸⁾. Stakeholder references to additional scientific papers, consumer surveys and other
1705 relevant documents were analysed in order to complement the literature review carried out in the first step.

1706 The information was analysed considering its potential use when modelling the user phase in the environmental
1707 and economic analysis taking place at a later stage of the preparatory study (task 5 of the MEerP), and also its
1708 connection with potential **ecodesign requirements** to be developed within the aspects listed in Article 5(1) of
1709 the ESPR as well as with potential **EU Ecolabel** and **GPP criteria**.

1710 The user behaviour chapter covers aspects such as the way users choose to buy apparel, their habits during the
1711 use phase, and why they decide to dispose of. It distinguishes user behaviour aspects at pre-purchase (section
1712 6.2.), post-purchase (section 6.3.) and disposal stages (section 6.4.).

1713 The table below indicates the main aspects related to user behaviour that will inform the modelling phase and
1714 the development of potential ecodesign requirements. Knowledge of user behaviour can help to identify barriers
1715 and restrictions to possible ecodesign measures resulting from social or cultural factors. Having information
1716 about how frequently consumers buy apparel, the temperature of washing or whether softeners are used or
1717 not, is important for the modelling. Equally, knowing whether consumers can assess the quality of apparel, what
1718 are their priorities when purchasing, whether users follow care labels, reasons for disposal and if consumers
1719 are willing to repair the apparel or not, are relevant considerations for the development of ecodesign
1720 requirements. The table below indicates the main user behaviour aspects that will serve as relevant input in the
1721 modelling of the environmental impacts and the life cycle costs of apparel, and for the development of potential
1722 ecodesign requirements.

1723

¹¹⁸ Initial questionnaire. Preparatory Study on textiles for product policy instruments – the initial questionnaire. Available at [this link](#).

Table 35. Potential application of user behaviour aspects in the next steps of the preparatory study

ID	Aspect	Information used for	Comments
1	Reasons for purchasing	Potential ecodesign requirements	Reasons for purchasing showcase the triggers for new apparel purchases and can shape the development of ecodesign requirements.
2	Criteria used when purchasing	Potential ecodesign requirements	The criteria used when purchasing could give an indication of which aspects of the apparel are more relevant to users, e.g. durability.
3	Quality assessment of apparel	Potential ecodesign requirements	Quality and longer apparel lifespans are important to consumers. This supports the focus on durability ecodesign requirements.
4	Attitude towards second-hand purchases	Potential ecodesign requirements	Supports the development of potential durability requirements.
5	Attitudes towards chemicals in apparel	Potential ecodesign requirements	Supports the development of requirements on substances of concern. Provides relevant input for the EU Ecolabel potential criteria on chemicals.
6	Attitudes towards the purchase of apparel made with recycled materials	Potential ecodesign requirements	Supports the development of requirements on recycled content. Provides relevant input for the EU Ecolabel and/or EU GPP potential criteria on recycled content.
7	Laundrying practices ^(a)	Modelling and potential ecodesign requirements	Different washing temperatures, washing frequencies and sorting practices among users can be modelled to show the way they affect the durability and quality of apparel. Potentially relevant input for the assessment of the environmental impact and the life cycle costs.
8	Care labels	Potential ecodesign requirements	The user behaviour informs how care labels are used by users and what aspects may be missing from them ⁽¹¹⁹⁾ , supporting the drafting of information requirements and the development of the Digital Product Passport.
9	Reparability	Potential ecodesign requirements	Potential reparability and durability ecodesign requirements can be shaped by user behaviour data on reparability e.g. the link between the apparel item and accessories such as buttons that tend to fail sooner.
10	Long-term apparel storage	Potential ecodesign requirements	The user storage of apparel could affect its lifespan, thus it may be considered in the LCA modelling phase.
11	Reasons for disposal ⁽¹²⁰⁾ and product-person attachment	Potential ecodesign requirements	The early disposal of apparel by users could trigger the need for the development of durability ecodesign requirements. Reasons for apparel disposal include loss of functionality and quality. These are aspects that create product-person attachment which translates into apparel being kept in the system for longer. This supports the focus on design for durability requirements.
12	Reasons for returning apparel	Potential ecodesign requirements	The lack of quality of ordered apparel is among the main reasons for returning products ordered online. This supports potential inclusion of durability ecodesign requirements.

1725

1726

1727

^(a) It includes sorting before washing, washing temperature and frequency, choice of detergent and softener, drying, ironing, and storing after washing and drying

Source: own production

¹¹⁹ The ongoing review of the Textile Labelling Regulation is also assessing this same issue.

¹²⁰ In this study the term 'disposal' used to refer to the generic action of getting rid of a product, regardless of whether the product becomes waste or it simply changes ownership as a product. The general use of the term 'disposal' in this Preparatory Study should not be understood to imply 'disposal operations' described in Annex I of the Directive 2008/98/EC on waste and repealing certain Directives Available at [this link](#).

1728 **Note:** The following sections provide a summary of the main learnings and observations derived from an
1729 extensive literature search carried out on user behaviour with regards to apparel. **A more detailed review of**
1730 **literature corresponding to pre-purchase, post-purchase and disposal aspects is provided in the**
1731 **annex, Section 10.6.**

1732 **6.2 Pre-purchase aspects**

1733 **6.2.1 Reasons for purchasing apparel**

1734 Consumer behaviour in the apparel industry is influenced by various factors, including individual perspectives
1735 on purchasing and the prevalence of spontaneous buying behaviour. Understanding the motivations behind
1736 consumer purchases, whether driven by functionality or self-representation, shows what qualities in apparel
1737 users consider to be important for them.

1738 — **Diverse consumer perspectives and reasons for purchasing:** There are two primary consumer
1739 approaches towards apparel - those viewing it as purely functional and those seeing it as self-
1740 representational. These perspectives significantly influence consumer priorities during the purchase process
1741 (McNeill and Moore 2015). Research suggests that the primary purchase motivations include looking good,
1742 replacing old items (Ribeiro et al., 2023), buying essential wear, staying on-trend, and preparing for special
1743 occasions (D&B, 2020).

1744 — **Spontaneous buying behaviour:** Apparel purchases often occur spontaneously, with a considerable
1745 proportion in the 40-70 age group engaging in frequent spontaneous buying. This trend indicates that a
1746 majority of consumers may not thoroughly inform themselves before making apparel purchases and act
1747 on impulse (Kleinhüchelkotten et al., 2018a). Discount offers, including global phenomena like New Year
1748 sales, influence impulsive purchases, leading to more frequent buying and increased monthly spending on
1749 apparel (D&B, 2020a; Djafarova and Bowes, 2021; Heiny and Schneide, 2021; Amasawa and Kimita, 2023).

1750
1751 — **Digital vs. physical shopping dynamics:** While visual aids on social media attempt to replicate physical
1752 store experiences (Djafarova and Bowes, 2021), impulse purchases are more closely associated with
1753 physical stores, particularly affecting the younger population (Cook and Yurchisin, 2017). However,
1754 malicious interface design strategies, such as dark patterns, are prevalent in online shopping sites (Yada et
1755 al., 2022) where they mislead users into making purchases that may not align with their best interests,
1756 including unnecessary spending (Schäfer et al., 2023). An example of a dark pattern frequently observed
1757 in apparel purchases is the 'low-stock message,' which falsely claims that a product is nearly sold out to
1758 induce a sense of urgency and prompt quicker buying decisions (Schäfer et al., 2023).

1759
1760 The level of information provided by surveys on reasons for purchasing apparel is sufficient to get an idea of
1761 the different consumer preferences. It should be noted that the literature does not provide an order of
1762 importance or a priority list for the reasons for purchase mentioned by consumers.

1763 The reasons users have for purchasing apparel are diverse and highly dependent on personal preferences.
1764 However, some seem to be linked to the need to replace apparel that is old, worn out or broken to a certain
1765 extent. In these cases, information requirements on reparability and disposal could guide the user concerning
1766 ways to repair the product to ensure optimum durability.

1767 In the cases in which impulse purchases are involved, information requirements on the product itself regarding
1768 the life-cycle environmental impacts of the apparel item in question, would allow consumers to be more aware
1769 of the impact of their purchase and make evidence-based decisions.

1770 **6.2.2 Criteria used when buying apparel**

1771 When it comes to purchasing apparel, consumers navigate a complex landscape of decision-making criteria that
1772 encompass various factors influencing their choices. These criteria often include considerations such as product
1773 quality, price affordability, brand significance, durability, ease of care, and alignment with personal values and
1774 preferences. Additionally, age-related preferences and sustainability concerns further shape the decision-
1775 making process, highlighting the diverse range of factors at play in the apparel market.

1776 — **Main apparel purchase decision attributes:**

- 1777 • Quality and price are paramount factors influencing consumers' apparel purchasing decisions, with
1778 97% emphasising the importance of product quality and 94% expressing a similar sentiment

1779 towards price in a survey run among 26 635 European citizens (European Commission. Directorate
1780 General for Environment, 2023). Similarly, price is for 68% of 11 483 consumers from ten
1781 European countries the most important factor when purchasing clothes, followed by quality (61%)
1782 and fit (56%) (YouGov, 2021).

- 1783 ● The brand's significance has less importance when purchasing apparel compared to quality and
1784 price (YouGov, 2021; European Commission. Directorate General for Environment., 2023).
- 1785 ● Other studies indicate that the perceived value of an apparel item by a specific user is also a
1786 significant driver of purchasing behaviour, with quality and functionality following closely behind
1787 (AK Wienn and Greenpeace, 2023a; Mishra et al., 2023; Thredup, 2023).
- 1788 ● Durability and ease of care seem not to be explicitly considered by users during apparel purchases
1789 but are associated with perceived quality according to De Klerk and Lubbe (2008) and Wakes et
1790 al. (2020). However, other studies highlight durability in the top three main aspects to influence
1791 the decision to purchase apparel items such as coats or jackets (Consumers, Health, Agriculture
1792 and Food Executive Agency et al., 2018) and is also the fourth most important aspect when
1793 purchasing apparel for 30% of 11 483 consumers from ten European countries (YouGov, 2021).
- 1794 ● According to a Cotton Incorporated (2014) survey, the top pre-purchase drivers for sportswear
1795 among consumers are comfort (77%), fit (69%), washes clean (65%), quality (64%), and durability
1796 (62%).

1797 — **Age-related purchase preferences:**

- 1798 ● Fashion trends hold greater significance for younger consumers, as they see them as a sign of
1799 success (AK Wienn and Greenpeace, 2023a; Spaepen et al., 2021).
- 1800 ● Older generations prioritize new items, comfort, country of origin, textile material, and brand
1801 knowledge (Spaepen et al., 2021).

1802 — **Sustainability considerations:**

- 1803 ● Some sources highlight that across all Member States, a majority of respondents reply that the
1804 environmental impact of a product is 'very' or 'rather important' in their purchasing decisions
1805 (European Commission. Directorate General for Environment, 2023). In fact, in an EU-wide survey
1806 involving 27 498 respondents, three-quarters express the view that apparel should be crafted
1807 from materials that are recyclable (European Commission, 2019). Moreover, around 54% of 2 500
1808 Spanish consumers would appreciate having more information on the recyclability of the apparel
1809 item they purchase (Asociación para la Gestión del Residuo Textil y el Calzado, 2024).
- 1810 ● Other sources indicate that sustainability and social standards rank lower in importance compared
1811 to price or quality considerations when purchasing (Consumers, Health, Agriculture and Food
1812 Executive Agency. et al., 2018; AK Wienn and Greenpeace, 2023a). In fact, approximately 32% of
1813 the 27 498 EU survey respondents express agreement with the notion that they are not concerned
1814 about the environmentally-friendliness of their apparel (European Commission, 2019) while only
1815 15% of 11 483 consumers from ten European countries consider important the environmental
1816 impact of the apparel item when purchasing (YouGov, 2021). Moreover, approximately half of the
1817 27 498 respondents indicate that apparel should be offered at the lowest possible price,
1818 irrespective of the environmental impact or working conditions during its production, with a similar
1819 proportion of respondents in disagreement with this statement (European Commission, 2019).
- 1820 ● Approximately 82% of 27 498 survey respondents believe that there is insufficient information
1821 available regarding environmental aspects and working conditions associated with apparel
1822 (European Commission, 2019).
- 1823 ● The willingness of having more information on the sustainability of products in the category of
1824 'textiles, clothing/footwear' seems relatively high. In particular, 71% out of 26 635 survey
1825 respondents in the EU-27 Member States express a desire to find more of the above-mentioned
1826 products carrying the EU Ecolabel. This sentiment is prevalent in all countries, to varying degrees
1827 (from 54% in Czechia to 83% in Portugal and Romania) (European Commission. Directorate
1828 General for Environment, 2023).
- 1829 ● Research by consumer organizations indicates that people are becoming increasingly aware of the
1830 environmental issues related to the textile sector and are willing to adjust their behaviours as a
1831 result (BEUC, 2023). For example, national-level surveys, particularly in Spain (OCU, 2018),
1832 Germany (VZBV, 2022), and Austria (AK Wienn and Greenpeace, 2023a), have highlighted that a
1833 significant majority of consumers prefer long-lasting clothing and are inclined to avoid purchasing
1834 new items to support climate protection.

1835 In summary, purchase decisions are very much influenced by the perception of quality and price, but there are
1836 other factors (trends, sustainability, comfort, perceived value), which are of varying importance to different
1837 population segments (based on their age, education level). Given the analysed information provided by surveys,
1838 there is no doubt that quality in apparel is very important for consumers. As apparel quality is closely linked to
1839 its durability, developing ecodesign requirements for this product aspect deserves further consideration.

1840 Moreover, the fact that a high number of consumers believes that environmental information about apparel is
1841 not sufficient is relevant for consideration of possible information requirements on environmental impacts of
1842 apparel.

1843 Equally important is the certainty that consumers would like to find more apparel holding the EU Ecolabel, which
1844 supports the revision of requirements set by this label.

1845 Criteria applied by consumers when buying apparel can support the inclusion and prioritization of ecodesign
1846 requirements on certain product sustainability aspects (e.g. durability) and the setting of classes of
1847 performance, as appropriate.

1848 **6.2.3 User quality assessment of apparel: key insights**

1849 Understanding how users assess the quality of apparel involves examining various phases and factors that
1850 influence their perceptions. This assessment is influenced by intrinsic attributes like material and fit, as well as
1851 extrinsic factors such as brand reputation and manufacturing location. Additionally, experienced features and
1852 personal values play a significant role in shaping perceptions of quality. Consumers also tend to associate
1853 durability and ease of care with higher quality apparel, with a strong expectation for long-lasting products.
1854 Despite the role of price in influencing perceptions of quality and longevity expectations, studies suggest that
1855 cheaper apparel is not necessarily synonymous with lower quality, indicating a complex relationship between
1856 price and perceived value.

1857 — **Phases of quality assessment by users:**

- 1858 • Consumer evaluates the quality in apparel in three phases: at the point of purchase, during use,
1859 and upon disposal (Piippo et al., 2022a).

1860 — **Factors influencing the perception of quality:**

- 1861 • Intrinsic attributes (material, fit), extrinsic factors (brand, manufacturing location), experienced
1862 features, and values influence the perception of quality in apparel (Niinimäki, 2011; Koszewska,
1863 2016; Henninger et al., 2017).

1864 — **Interlinkages between durability and quality in apparel:**

- 1865 • Durability and ease of care are associated with perceived quality (De Klerk and Lubbe, 2008;
1866 Wakes et al., 2020a).
- 1867 • Consumers expect high-quality apparel to be durable (Yuille, 2015). In fact, 43% of survey
1868 respondents declared that long-lasting products are generally better quality (Consumers, Health,
1869 Agriculture and Food Executive Agency et al., 2018).
- 1870 • In 2019, nine in ten respondents (88 % out of 27 498 EU-27 citizens) indicated that apparel should
1871 be made to last longer (European Commission, 2019). Among the reasons, over 45% of
1872 respondents of another survey indicated that they will save money if apparel items such as coats
1873 or jackets last longer (Consumers, Health, Agriculture and Food Executive Agency et al., 2018).

1874 — **Role of price in apparel quality perception and longevity expectations:**

- 1875 • Consumer expectations of apparel longevity are linked to the price, particularly for younger
1876 generations (Monitor, Cotton Incorporated Lifestyle, 2018; Wakes et al., 2020a).
- 1877 • Price may not always accurately reflect quality and durability (Ghaani Farashahi et al., 2018a;
1878 Wakes et al., 2020a). In fact, some studies indicate that cheaper apparel is not always synonymous
1879 with lower quality (Wakes et al., 2020a; Badgett, 2017).
- 1880 • 43% of Austrian survey participants express a willingness to buy long-lasting apparel despite the
1881 price, with 30% already practising this behaviour (AK Wienn and Greenpeace, 2023a) while 55%
1882 out of 1 000 German consumers would be willing to pay more for their apparel if being certain
1883 about increased durability (VZBV, 2022).
- 1884 • For coats or jackets, over 60% of 1 001 respondents' observations indicated that it is hard to tell
1885 how long a product will last (Consumers, Health, Agriculture and Food Executive Agency et al.,
1886 2018).

1887 Overall, the references analysed provide consistent views on the fact that the assessment of quality by users
1888 is multifactorial and somewhat subjective because, inter alia, it is largely based on tactile experience with the
1889 apparel.

1890 In the previous section, apparel quality has been highlighted as a key aspect users deem to be important in the
1891 apparel they purchase. However, how consumers assess quality is not always clear as this can be very
1892 subjective. For this reason, information on the performance of the product could provide consumers with
1893 additional, objective quality parameters for the apparel. Information requirements on product aspects linked to
1894 durability, and even reliability, could enable consumers to better understand and assess the quality of apparel.

1895 In order to facilitate the user's assessment of the quality of apparel, performance requirements based on
1896 product durability, reliability and reusability aspects could, as appropriate, include minimum levels. Another
1897 possibility could be to define requirements connected to the functional performance of apparel. Information
1898 requirements related to the above-mentioned product parameters could serve as metrics to guide users'
1899 assessment of quality in apparel.

1900

DRAFT - work in progress

1901 **6.2.4 Consumer behaviour towards labels on apparel**

1902 Consumer behaviour towards labels on apparel plays a pivotal role in shaping purchasing decisions and
1903 influencing perceptions of product quality and sustainability. Expectations regarding label information vary, with
1904 consumers expressing preferences for receiving details about durability and/or reparability either via official EU
1905 labels, product descriptions, or retailers. Offering such information on labels has the potential to impact the
1906 relative importance of price in purchasing decisions, highlighting the growing interest in transparency and
1907 sustainability among consumers. This interest extends to EU Ecolabel products, with a substantial proportion of
1908 survey respondents expressing a desire for more environmentally friendly options in apparel.

1909 — **Consumer attention to labels in general:**

- 1910 • There is limited information regarding the level of consumer attention to apparel labels generally
1911 speaking, except for care labels (Section 6.3.2).

1912 — **Expectations regarding label information:**

- 1913 • Around 18% of over 4 880 user responses indicate that consumers expect to receive information
1914 regarding the durability of coats or jackets via an EU official label while the majority prefers to receive
1915 such information via product descriptions (39.9%) or via the retailer (36%) (Consumers, Health,
1916 Agriculture and Food Executive Agency. et al., 2018).
- 1917 • Offering details about durability on labels could alter the relative importance of price when making
1918 purchasing decisions (Consumers, Health, Agriculture and Food Executive Agency. et al., 2018).
- 1919 • A significant 74% of 1 000 Italian consumers expressed a strong need for clearer and more transparent
1920 information about the sustainability of apparel and the production processes involved (Altroconsumo
1921 and IPSOS, 2024).
- 1922 • In the case of reparability information, 14% of survey respondents expect to have such information
1923 via an EU official label while the majority would opt to have it via the retailer (35.6%) and via product
1924 descriptions (33.6%) (Consumers, Health, Agriculture and Food Executive Agency. et al., 2018).

1925 — **Growing interest in EU Ecolabel products:**

- 1926 • There is increasing interest in EU Ecolabel textile products. A total of 71% of 26 635 EU survey
1927 respondents express a desire for more EU Ecolabel textile products. There is a consistent level of
1928 interest across countries, ranging from 54% in Czechia to 83% in Portugal and Romania (European
1929 Commission. Directorate General for Environment, 2023).

1930 Understanding the way and extent to which consumers respond to information contained on labels can support
1931 the development of information requirements, for instance related to the environmental impacts of a product
1932 and its performance on specific product sustainability aspects.

1933 **6.2.5 Attitudes towards second-hand apparel purchase**

1934 There is a growing interest in second-hand apparel reflected in consumer attitudes. Evidence suggests a
1935 significant portion of consumers are open to purchasing second-hand items. While concerns about hygiene and
1936 a preference for new items persist among some, the appeal of financial savings and eco-friendly practices
1937 drives many to incorporate second-hand pieces into their wardrobe. Additionally, emotional attachment to
1938 clothing items further boosts positive attitudes towards second-hand shopping, highlighting a nuanced
1939 approach to fashion consumption.

1940 — **Consumer inclination towards second-hand apparel:**

- 1941 • There is a certain interest among consumers towards second-hand apparel, as indicated by 34%
1942 of the 26 595 respondents showing a readiness to buy second-hand apparel (European
1943 Commission. Directorate General for Environment, 2014).
- 1944 • Over 70% of 27 498 respondents in the EU agree that the promotion of second-hand apparel
1945 should be increased (European Commission, 2019).
- 1946 • About 37.4% of the population actively engages in buying second-hand apparel, while concerns
1947 about hygiene and a preference for new items are primary reasons for non-participation (D&B,
1948 2020a).
- 1949 • Those incorporating second-hand apparel tend to purchase fewer new items, with financial
1950 savings, sustainability, and a preference for unique pieces being primary drivers (D&B, 2020a).
- 1951 • The emotional value users have for apparel items significantly boosts positive attitudes towards
1952 second-hand clothing (Rulikova, 2020; Amini et al., 2021; Koay et al., 2022).

1953 — **Marketing strategies in second-hand apparel:**

1954 • Preliminary observations from Turunen and Gossen (2024) suggest that current second-hand
1955 business models often employ consumption-promoting marketing strategies and include a rise in
1956 unworn or lightly used items on second-hand platforms. Additionally, subscription models may
1957 lead to shorter apparel lifespans, and self-service flea markets, with their low prices, can attract
1958 shoppers more interested in the experience than in making responsible purchases (Turunen and
1959 Gossen, 2024).

1960 — **The concept of replacement rates and second-hand apparel:**

1961 • The 'replacement rate' refers to the extent to which purchasing second-hand apparel substitutes
1962 the need for new items (Nørup et al., 2019; Trzepacz et al., 2023). Studies show that second-hand
1963 purchases generally reduce the need for new apparel, potentially extending the lifespan of existing
1964 clothing (Nørup et al., 2019; Trzepacz et al., 2023). For example, a survey indicated that 39% of
1965 second-hand buyers would have otherwise bought a new product (Vinted, 2021). However,
1966 replacement rates vary, and factors such as the quality of second-hand items can influence their
1967 environmental benefits (Farrant et al., 2010; Sandin and Peters, 2018; Trzepacz et al., 2023).

1968 — **Gender and age dynamics:**

1969 • Women show a higher inclination to purchase second-hand apparel, with approximately 40%
1970 embracing this trend compared to just over 25% of men (European Commission. Directorate
1971 General for Environment, 2014; D&B, 2020a).

1972 • The younger population, especially those aged 18-25, lead in the adoption of second-hand apparel,
1973 while participation decreases in the 26-40 age group (D&B, 2020a).

1974 The willingness of users to purchase previously used apparel (second-hand) can be relevant in view of the
1975 potential definition of ecodesign requirements on reusability.

1976 **6.2.6 Attitudes towards the purchase of apparel made without harmful chemicals**

1977 Consumer attitudes towards chemicals in apparel encompass a spectrum of perceptions shaped by factors such
1978 as fabric type, geographical location and evolving consumer preferences. Insights from surveys and analyses
1979 offer valuable perspectives on the perceived risks associated with chemicals in apparel fabrics, highlighting
1980 varying degrees of concern and priorities among consumers.

1981 — **Chemical perception in apparel:**

1982 • In a survey spanning 27 EU Member States, 60% of 26 718 respondents perceive chemicals in
1983 apparel fabrics as minimally risky, with most not seeing them as a threat to people (European
1984 Commission, 2009). However, more recent evidence shows that consumers are increasingly
1985 concerned about the use of hazardous chemicals in apparel (Evaluation report of the Textile
1986 Labelling Regulation, under development). In a survey of over 2 000 Spanish consumers, around
1987 61% identified restricting hazardous chemicals in clothing as the second most important action
1988 for policymakers (CECU, 2023).

1989 • Synthetics are perceived as posing the highest risk among fabric types, with only 22% categorising
1990 them as significantly risky (European Commission, 2009).

1991 — **Country-level variances in risk considerations:**

1992 • A country-level analysis reveals that environmental and health risks are deemed very important
1993 by about two-thirds of respondents in Germany and Slovakia. In contrast, more than six in ten
1994 respondents in Denmark and the United Kingdom consider this aspect unimportant (European
1995 Commission, 2009).

1996 • Data from the Fashion Revolution (2020) survey, covering 5 000 consumers across the United
1997 Kingdom, France, Germany, Italy, and Spain, indicates that an average of 37% considers it
1998 important to buy apparel produced without harmful chemicals. Similarly, 36% of 11 483
1999 consumers from ten European countries consider important that there are less or no chemicals in
2000 the apparel they are buying (YouGov, 2021). The surveys do not provide detailed information about
2001 the types of chemicals.

2002 The user perception towards chemicals in apparel, especially as regards substances that pose a risk to human
2003 health or to the environment, could support the establishment of information requirements on the presence of
2004 substances of concern. This in turn can inform possible actions that could be addressed in specific legislation
2005 on the safe use of chemicals such as REACH (e.g. via prioritisation in the REACH restrictions “roadmap” which is
2006 subject to periodic review by the Commission).

2007 **6.2.7 Attitudes towards the purchase of apparel made with recycled materials**

2008 Knowledge of consumer attitudes towards apparel containing recycled material (recycled content) is relevant
2009 for the analysis of technologies reported in Section 9.

2010 — **Consumer preference for recycled materials:**

2011 • According to the Fashion Revolution (2020) survey of 5 000 consumers in the United Kingdom,
2012 France, Germany, Italy, and Spain, an average of 11% emphasize the importance of their apparel
2013 containing recycled materials.

2014 Nearly 60% of the 2 500 Spanish consumers surveyed expressed a desire to purchase textiles
2015 and/or footwear made from recycled materials, while around 25% reported that they have already
2016 made such purchases (Asociación para la Gestión del Residuo Textil y el Calzado, 2024).

2017 — **Age group differences:**

2018 • Younger respondents (12-24 years old) give it greater importance, with 14% indicating a
2019 preference for apparel containing recycled materials, compared to only 7% in the 55-75 age group
2020 (Fashion Revolution, 2020).

2021 **6.3 Post-purchase aspects**

2022 **6.3.1 User behaviour during use: laundering practices**

2023 User laundering practices include sorting before washing, use of a certain washing temperature, washing
2024 frequency, choice of softeners and detergents, drying methods, ironing, and storage. Consumer behaviour
2025 related to apparel laundering practices influences the environmental impact during the life of the product and
2026 constitutes relevant input for the assessment of the environmental impact and the life cycle costs of an apparel
2027 product.

2028 Moreover, research indicates that consumer behaviour during the use and care of apparel may significantly
2029 impact the lifespan of apparel too. It could therefore be a good idea for apparel items to be accompanied by
2030 information for consumers and other end users on how to maintain the product to ensure a longer lifespan.
2031

2032 — **Sorting before washing:**

2033 • Sorting practices vary based on factors like washing temperature, colour, fibre type, and care
2034 labelling (Laitala et al., 2012).

2035 • Sorting based on washing temperature is more common among consumers compared to washing
2036 everything together (Laitala et al., 2012).

2037 — **Washing temperature and washing frequency:**

2038 • The average European washing temperature is 42.4 °C (A.I.S.E., 2020).

2039 • Differences in washing habits (i.e. washing temperature used, choice of detergent and softeners,
2040 etc.) are observed across countries. Factors like age, location and societal norms contribute.

2041 • Sportswear often features distinct fibres and fabrics that can quickly absorb sweat and may lead
2042 to unpleasant odours, necessitating more frequent laundering compared to everyday casual wear
2043 (Wei et al., 2020; Chang and Wang, 2023) typically after a single use (Brice and Thorpe, 2021).

2044 • User beliefs about hygiene and convenience may impact the apparel washing frequency (D&B,
2045 2020a).

2046 — **Choice of softeners and detergents:**

2047 • Users often dose detergent arbitrarily; overdosing is common (A.I.S.E., 2020).

2048 • Fabric softeners are used in approximately 55% of washing cycles in Europe (Stamminger, 2016
2049 as cited in Klepp and Laitala, 2023a).

2050 • Economic factors play a substantial role in users' choices of laundry products.

2051 — **Consumer awareness on microplastics release during washing cycles:**

2052 • A survey of 411 Belgian citizens revealed that while 68% are aware of plastic pollution, only 37%
2053 are aware of microfiber pollution and its connection to the issue. Awareness of synthetic fibre
2054 pollution is lowest among individuals under 25 (29%) and highest among those aged 41 to 60
2055 and over 60, though still less than half in these groups are informed (43%) (Herweyers et al.,
2056 2020).

2057 — **Drying and ironing:**

2058 • Analysing domestic apparel ironing and drying phases is challenging due to the limited availability
2059 of data (Munasinghe et al., 2021).

- 2060
- 2061
- 2062
- 2063
- 2064
- 2065
- 2066
- Diverse drying methods include air-drying, electric dryers and dedicated drying spaces. Survey data provide insights into specific drying methods where line-dried outdoors (natural drying) is one of the most commonly used drying methods for apparel (Laitala et al., 2020; GINETEX, 2017a).
 - Ironing practices have decreased over the years; habits vary across countries and demographics. The frequency of ironing is influenced by gender and age; men and younger respondents tend to iron less (Klepp and Laitala, 2023b).

— **Storage after washing and drying**

- 2067
- 2068
- 2069
- The folding and storage of apparel after washing and drying may influence the lifespan of apparel. However, no studies have been found on post-washing, drying and storage behaviours.

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Sufficient information is available on commonly used washing temperatures among users as well as washing frequency. When it comes to sorting before washing, drying and ironing practices, the literature is more limited. Additionally, the surveys analysed on choice of softeners and detergents provide valuable information for the LCA modelling phase given that softeners could be a source of substances of concern to be taken into consideration.

2075

6.3.2 Following apparel care label instructions

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Apparel care labels provide instructions on washing temperature, cycles, detergents, etc. Surveys and studies shed light on consumer attitudes and behaviours regarding care label instructions, revealing insights into adherence rates, preferences for accessing instructions, and associations with care label symbols.

2079

— **Attitudes towards care label instructions:**

- 2080
- 2081
- 2082
- 2083
- 2084
- 2085
- Surveys indicate that a significant percentage of users follow care instructions on apparel labels (GINETEX, 2017a; GINETEX, 2019).
 - Users' adherence to care labels diminishes after the initial wash (McLaren et al., 2015).
 - Some users cut out care labels, affecting the resale potential of apparel (GINETEX 2017).
 - Some users prefer new ways to access the apparel care instructions, such as QR codes on smartphones (COFREET, 2023; Ribeiro et al., 2023).

2086

— **Association with care label symbols:**

- 2087
- 2088
- 2089
- 2090
- 2091
- Surveys show consistent understanding of symbols like ironing and washing (AB-REOC and BV-OECO, 2019; GINETEX, 2017a).
 - Users' poorer understanding of symbols for bleaching, drying, and professional cleaning may be due to them being less intuitive (AB-REOC and BV-OECO, 2019; GINETEX, 2017a).

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Relevant information can be extracted from the available surveys on user interaction with care labels, especially when it comes to the extent to which users follow care labels in Europe. For other user behaviour patterns in relation to care labels, information is available only from one survey, and so not allowing the comparison of information from different sources. Nonetheless, all the surveys related to user behaviour and apparel care labels have an ample respondent base, making the results valuable for the preparatory study at hand.

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Additionally, the user behaviour analysis provides insights on apparel maintenance aspects that may either be missing or need further clarification on care labels. This is valuable data for the development of information requirements for consumers on how to use and maintain the product in order to minimise its impact on the environment and to allow for optimal duration.

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Finally, consumer opinions about care label instructions and their level of adherence to them can guide the manner in which the information could be provided (e.g. in the Digital Product Passport or directly on a label as referred to in Article 14 of the ESPR final compromise text).

2105

6.3.3 Reparability

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The consumer relationship with apparel often exhibits a transient nature, characterised by the disposal of items before they reach the end of their lifecycle. This disposability stems from factors such as overconsumption and the convenience of replacing rather than repairing apparel. Moreover, diminishing sewing skills and limited access to repair services further impact consumers' decisions regarding garment maintenance and repair.

2110

— **Transitory relationship with apparel:**

- 2111
- 2112
- Consumers have a transient relationship with apparel, often disposing of items before they are worn out or broken (Harris et al., 2016).

- 2113 • Reasons for this behaviour include overconsumption and the convenience of replacing unwanted
2114 items rather than repairing them. A lack of emotional attachment to the product is observed
2115 (Terzioğlu, 2021; EEA, 2022a).
- 2116 • Most survey respondents rated reparability as unimportant when purchasing apparel items such
2117 as coats or jackets while only about 11% considered reparability to be important (Consumers,
2118 Health, Agriculture and Food Executive Agency. et al., 2018).
- 2119 — **User decisions and repair capabilities:**
- 2120 • Sewing skills for apparel repair are diminishing, attributed to a lack of dedicated teaching in
2121 schools and at home and a scarcity of time and repair equipment (Finnish Ministry of the
2122 Environment, 2023a).
- 2123 • Trust in one's own skills is a significant motivator for engaging in sewing and repairs (Finnish
2124 Ministry of the Environment, 2023a).
- 2125 • Users decide to mend apparel based on sewing skills; some can sew a button, but fewer can
2126 replace zippers (Laitala and Boks, 2012).
- 2127 — **The apparel repair sector in the EU:**
- 2128 • Repair in Europe is common, but the total cost is influenced by high labour costs, equipment, and
2129 materials (EEA, 2022a).
- 2130 • On average, the share of survey respondents rating the availability of repair services as having a
2131 lot of influence on their purchasing decision was relatively low (Consumers, Health, Agriculture and
2132 Food Executive Agency et al., 2018).
- 2133 • Difficulties accessing repair services notably diminished the appeal of repair (Consumers, Health,
2134 Agriculture and Food Executive Agency et al., 2018).
- 2135 • Lack of information about, trust in, and satisfaction with repair services hinder consumer
2136 engagement (EEA, 2022a).
- 2137 • Research by [Laitala et al. \(2023\)](#) emphasizes the need for clear guidelines on what constitutes
2138 unacceptable wear versus normal use.

2139 The user behaviour analysis identifies a series of common apparel repairs that users generally carry out. These
2140 apparel repairs are generally limited to simple ones, such as substituting a button, and only a limited fraction
2141 of the population is skilled enough to engage in more demanding repairs such as changing a zipper.
2142 Performance requirements for reparability could be considered to ensure the availability of replacement
2143 components that, according to users, tend to break or wear out most frequently. Moreover, information on the
2144 period of availability of spare parts (e.g. buttons and other accessories) and the possibilities of repairing may
2145 also contribute to further user engagement in repair activities whether privately or by visiting repair shops.

2146 It could also be envisaged that information requirements would provide instructions or 'use cues' in the product
2147 to guide the correct repair or replacement of the above-mentioned apparel components. This could facilitate
2148 the ease of self-repair by the user but also guide tailors when repairing apparel, guaranteeing that a certain
2149 level of quality in the apparel repair is achieved. Some of this information could be included in the Digital
2150 Product Passport.

2151 **6.3.4 Storage of apparel**

2152 User behaviour regarding storage of apparel is linked to aspects described in Section 6.2 and Section 6.4.3. The
2153 storage of apparel items, whether temporary or permanent, appears to be strongly connected to the emotional
2154 attachment individuals have to their apparel. Increasing the emotional durability could potentially make users
2155 keep their items for longer, avoiding disposal and potentially increasing the number of uses. However, such
2156 storage does not prevent users from continuing to buy more apparel.

2157 — **Types of apparel storage:**

- 2158 • Apparel storage can be classified into two categories: active and inactive. Active apparel storage
2159 involves placing regularly worn items inside wardrobes or easily accessible spaces. Inactive apparel
2160 storage refers to keeping items at home without use for an extended period. Inactive storage
2161 constitutes over 30% of apparel in European closets (European Parliamentary Research Service,
2162 2019).

2163 — **Reasons for inactive apparel storage:**

- 2164 • Inactive apparel may include items that no longer fit, stored with the hope they will fit again, and
2165 as a means of monitoring weight (Bye and McKinney, 2007).

2166 — **Temporary storage practices:**

2167 • Temporary storage occurs when users are contemplating disposal methods, waiting for apparel to
2168 come back into fashion, repairing, or determining if there are still ways to utilise the apparel
2169 (Cluver, 2008a).

2170 — **Storage of basic apparel:**

2171 • Essential but outdated or worn-out basic apparel is stored until substitutes are purchased (Cluver,
2172 2008a).

2173 Information requirements related to the end-of-use options (e.g. reusability) for apparel that is no longer wanted
2174 could encourage users to opt to give a second life to their apparel, for instance via donation. This would avoid
2175 the storage of apparel users no longer wish to wear or to keep in their closets.

2176 **6.4 User behaviour related to the disposal of apparel**

2177 **6.4.1 Reasons for the disposal of apparel**

2178 Disposal ⁽¹²⁰⁾ of apparel happens when a user transfers its ownership to another person or entity (Cluver,
2179 2008a).

2180 The main reasons for apparel disposal seem to be due to certain product characteristics changing over time,
2181 damage or simply for reasons related to consumer preferences.

2182 — **Factors influencing disposal decisions:**

2183 • Individual characteristics, habits, demographics, product traits, and quality influence the decision
2184 to dispose of an apparel products (Cluver, 2008; Goworek et al., 2012, as cited in Harris et al.,
2185 2016; Sandin et al., 2019).

2186 • Perceived quality is crucial; low quality may lead to early disposal, and owning new apparel
2187 frequently shortens usage time (Aakko and Niinimäki, 2022).

2188 • Loss of symbolic perceived value also contributes to early disposal (Gwozdz et al., 2017a).

2189 — **Reasons for apparel disposal:**

2190 • A review by Laitala and Klepp (2022) of 17 consumer studies involving around 20 000
2191 participants identified the most common reasons for apparel disposal as intrinsic quality (34%),
2192 perceived value (31.4%), and fit issues (25.8%). These findings are consistent with the results
2193 summarized in **Table 36**, which also highlight these factors as the primary reasons for apparel
2194 disposal. While quality-related concerns are the leading cause, perceived value and fit issues are
2195 almost equally significant.

2196 • Price influences disposal frequency, with consumers valuing higher-priced items and disposing of
2197 cheaper apparel more frequently (Morgan and Birtwistle, 2009; Joy et al., 2012).

2198 — **Intrinsic durability and user perceptions:**

2199 • Intrinsic durability, defined during product design, influences the ability of apparel to withstand
2200 wear without compromising functionality and aesthetics (Alliance of Commerce and Deloitte,
2201 2022).

2202 • Physical issues like abrasion, colour changes, and broken zippers contribute to the perceived loss
2203 of intrinsic durability (Laitala and Boks, 2012).

2204 — **Disposed apparel problems:**

2205 • Predominant problems of disposed apparel: colour fading and fabric-related issues.

2206 • Other issues: pilling, fabric breakdown, accidental damage, loss of dimensional stability, logo
2207 failure, discoloration, holes in seams, and trim failure (Cooper and Claxton, 2022b).

2208 The combined dataset in **Table 36** from various studies (detailed in Section **10.6.3.1**) provides a comprehensive
2209 view of global apparel disposal trends. Survey participants across countries commonly cite intrinsic quality and
2210 fit as reasons for disposal of apparel.

2211 Perceived value, taste-related factors, situational reasons, and fashion trends also play a role in apparel
2212 disposal. Overall, there is a complex interplay of individual factors contributing to disposal decisions.

2213

2214 **Table 36.** Main reasons for apparel disposal

Publication	Country	Main reasons for the disposal (expressed in % of respondents)				
		Intrinsic quality (e.g worn-out items)	Fit issues	Perceived value (e.g. taste-related unsuitability)	Fashion changes	Other (e.g. Situational reasons, functional shortcomings)
Greenpeace. (2015)	Germany	92	72	64	40	NA
Ungerth and Carlsson. (2011)	Sweden	60	9	21	NA	4
Laitala and Boks. (2012)	Norway	49	19	11	NA	19
Laitala and Klepp (2020)	China, Germany, Japan, United Kingdom, and USA	44	13	35	NA	9
WRAP (2017b)	United Kingdom	18	42	33	NA	NA
Lang, Armstrong, and Brannon (2013)	USA	30	31	39	NA	NA
Morell-Delgado et al., (2024)	Spain	NA	44	21.5	NA	2.5
YouGov. (2019)	Italy	60	47	16	12	2
Accenture. (2022)	Poland	38	21	7	6	21

2215 N.B. NA: Not Available

2216 *Source: Own elaboration based on data provided in the indicated publications.*

2217 Changes in the product’s characteristics may relate to apparel quality issues that can shed light on which types
 2218 of performance and information requirements could be prioritised extend the duration of use of apparel
 2219 products. For instance, in order to enhance technical durability for an extended usage period, it is crucial to
 2220 understand the reasons behind consumer apparel disposal. Gaining such insights should aid in assessing
 2221 possible ecodesign requirements that foster the durability of the apparel, while also addressing practices
 2222 associated with premature disposal of apparel which have an overall negative impact on the environment.

2223 Moreover, the reasons for disposal can focus on certain aspects of the product’s performance.

2224 **6.4.2 Disposal channels**

2225 Users may dispose of apparel directly in the residual waste, donate it for reuse or pass on to family and friends.

2226 — **Disposal trends:**

- 2227 • The person-product type of attachment plays a key role in how apparel may be disposed of.
 2228 Sharing within social circles is consistent behaviour when there are positive associations with the
 2229 user’s apparel. Negative associations with the apparel may result in donation, swapping, or
 2230 disposal in the waste bin (Joung and Park-Poaps, 2013; Lewis, 2015). At the same time, throwing
 2231 away usable apparel is generally perceived negatively and as socially reproachable behaviour.
- 2232 • The overarching observation made by the European Commission. Directorate General Joint
 2233 Research Centre (2021) study regarding the quality of apparel found in residual waste is that there
 2234 exists a correlation between the proportion of apparel collected separately and the average quality
 2235 and value of apparel discarded in residual waste. According to the above-mentioned study, this
 2236 relationship is partly attributable to households' discerning decisions regarding the perceived
 2237 monetary value of apparel, determining which items merit donation or resale for reuse, and which
 2238 have minimal reuse potential. Supporting this notion, a 2018 study conducted in Denmark (Watson
 2239 et al., 2018) lends credence to this theory. It suggests that the 42 000 tonnes of apparel disposed
 2240 of in Danish residual waste for incineration in 2017 held an estimated value of 12-15 million
 2241 euros prior to disposal. In contrast, the 36 000 tonnes of apparel separately collected were sold

2242 on reuse markets for an estimated 65 million euros, signifying a value per tonne that is four to
2243 five times higher.

2244 The way users dispose of their apparel provides valuable data that can help shape information requirements
2245 related to end-of-life behaviour. For instance, information requirements may guide consumers and public
2246 authorities towards more sustainable choices when disposing of apparel, which could also contribute to
2247 enhanced separate apparel collection rates as prescribed by the Waste Framework Directive by Member States
2248 given the significant reuse potential of apparel.

2249 **6.4.3 Person-product attachment**

2250 The emotional attachment formed between the apparel and the consumer is generally referred to as 'person-
2251 product attachment'. This type of connection between a user and an apparel item has an influence on how long
2252 consumers own certain apparel and how often they make use of it. This person-product attachment is usually
2253 embedded in the term 'emotional durability', which goes beyond just functionality. The Ellen MacArthur
2254 Foundation report (Ellen MacArthur Foundation, 2021) defines emotional durability as: 'the product's relevance
2255 and desirability to a user, or multiple users, over time'.

2256 — **Ownership categories:**

- 2257 • Ownership categories include 'active' (daily use), 'seldom' (several times a year), and 'inactive/in
2258 storage' (rarely or never used) (Niinimäki and Armstrong, 2013).
- 2259 • A survey by Niinimäki and Armstrong (2013) identified elements fostering person-product
2260 attachment:
 - 2261 ○ Functionality: Comfort, good fit, multi-function, ease of matching, easy to put on.
 - 2262 ○ Memory: Memories, received from a special person, family ties.
 - 2263 ○ Emotional satisfaction: Looking/feeling good, receiving compliments, love for the brand.
 - 2264 ○ Design and style: Good design, in style.
 - 2265 ○ Fabric and material: Nice colour, pleasant touch, aesthetic, flexible.
 - 2266 ○ Personal values, quality, effort invested, and financial value: Uniqueness, feeling relaxed,
2267 durability, high quality, hand-made, reward for self, price (Niinimäki and Armstrong, 2013).

2268 — **Value of new apparel and barriers to reuse:**

- 2269 • Newly purchased apparel holds the highest emotional attachment due to its perceived intrinsic
2270 value (Forbrugerrådet Tænk, 2022).
- 2271 • New apparel is used more frequently than older apparel; second-hand apparel is used 30% less
2272 (Forbrugerrådet Tænk, 2022).
- 2273 • Reuse may extend the possession span but does not necessarily increase apparel usage (Laitala
2274 and Klepp, 2021).

2275 — **Emotional durability as a forward-looking issue:**

- 2276 • Emotional durability, linked to consumer perceptions, is challenging to measure, relying on social
2277 science concepts (Alliance of Commerce and Deloitte, 2022).

2278 — **Quality as a key factor in prolonged use:**

- 2279 • Quality is a significant factor in incentivising prolonged apparel use. In fact, consumers express
2280 willingness to wear apparel longer if it is of better quality, maintains shape and colour, and has a
2281 bonding effect (Kleinhüeckelkotten et al., 2019; Laitala et al., 2021a).

2282 — **Role of designers in increasing emotional attachment:**

- 2283 • Strategies to promote the product-person attachment include designing for long-term needs,
2284 incorporating added value, and creating adaptable, modular, or timeless products (Niinimäki and
2285 Armstrong, 2013; Alliance of Commerce and Deloitte, 2022).

2287 **6.4.4 Returns of apparel**

2288 The dynamics of online shopping and returns encompass various facets that influence consumer behaviour and
2289 preferences. Convenience emerges as a primary driver for the proliferation of online purchases, while return
2290 policies and processes significantly shape the shopping experience. This overview delves into return rates,
2291 underlying reasons for returns, and the factors influencing return behaviour, shedding light on the complexities
2292 of the retail returns landscape.

2293 — **Online shopping and returns:**

- 2294 • Convenience is a key reason for online shopping (AK Wienn and Greenpeace, 2023a).

- 2295 • Long return periods encourage more apparel orders, while inconvenient return processes lead to
2296 items being stored rather than returned (Forbrugerrådet Tænk, 2022).
- 2297 — **Return rates and demographics:**
- 2298 • Casual dresses, jackets and jeans have high return rates, with expensive products more likely to
2299 be returned (EEA, 2024).
- 2300 • Women tend to return more online purchases than men (AK Wienn and Greenpeace, 2023a; British
2301 Fashion Council’s Institute of Positive and Roland Berger, 2023).
- 2302 • Young consumers, more active in online shopping, tend to return apparel more frequently, ordering
2303 multiple sizes (AK Wienn and Greenpeace, 2023a).
- 2304 — **Reasons for returns:**
- 2305 • **Fit issues:** Fit issues is the main reason for returns, followed by taste-related unsuitability
2306 (including shape, material, colour, or pattern dislike), quality and faulty items (Foresight Factory,
2307 2021; Zimmermann et al., 2021).
- 2308 • **Mis-buying:** Common issue with online shopping, driven by fitting problems and consumer dislikes
2309 (Forbrugerrådet Tænk, 2022).
- 2310 • **Quality concerns:** Low quality, lack of durability, and buyer’s remorse also contribute to returns
2311 (Bernon et al., 2011).
- 2312 — **Factors influencing returns:**
- 2313 • **Sizing issues:** Difficulty interpreting sizing scales and inconsistent sizing contribute to fitting
2314 problems (Vladimirova et al., 2022).
- 2315 • **Return policies:** Consumers often check return policies before purchasing, and their return
2316 experience influences repeat purchases (Asdecker and Sucky, 2019).
- 2317 • **Assumptions about returns:** Many consumers assume returned items are always resold,
2318 impacting their return behaviour (Makov, 2023).
- 2319 Similarly to the reasons for apparel disposal, the causes for apparel returns may shed light on the product
2320 aspects that are important for users, e.g. quality. This could support the potential inclusion of durability
2321 ecodesign requirements.

2322 **7 Current EU Ecolabel criteria for textile products**

2323 This section analyses the current EU Ecolabel criteria for textile products ⁽¹²¹⁾ in light of their revision. Section
 2324 7.1 reports the facts and figures of the criteria, whereas Section 7.2 provides the main suggestions for the
 2325 criteria revision received via the initial questionnaire (see Table 1 in Section 1). Section 7.3 describes the
 2326 relationship between the new mandatory ecodesign framework (ESPR) and the revision of the EU Ecolabel
 2327 criteria for textile products. Finally, Section 7.4 provides a detailed comparison of the criteria for textile products
 2328 set by the EU Ecolabel, Blue Angel and Nordic Swan. This analysis set the bases to address Article 6(f) of the
 2329 EU Ecolabel Regulation which promotes synergy with other officially recognised ISO Type I environmental labels
 2330 (Ecolabels).

2331 **7.1 Facts and figures**

2332 In recent years, the number of licences and products awarded the EU Ecolabel for textile products has
 2333 continuously increased (**Figure 58** in Section 10.7.1). In September 2023, the EU Ecolabel for textile products
 2334 counted 86 licences and 9 250 products. The most licences were awarded by Denmark, Italy and Norway,
 2335 representing 28%, 21% and 13% of the total, respectively. The most products were awarded by Portugal, Italy
 2336 and Denmark, representing 42%, 36% and 14% of the total, respectively. More details are available in **Table**
 2337 **100** in Section 10.7.1.

2338 Table 37 reports the figures published in September 2023 according to the type of products. Most licences and
 2339 products awarded were textile apparel: 76% and 32% of the total products and licences, respectively.
 2340 Home/interior textiles were 8% and 18% of the total products and licences, respectively. Cleaning products were
 2341 11% and 16% of the total products and licences, respectively. Intermediate products represent a significant
 2342 percentage in terms of licences but less in products.

2343 **Table 37.** Figures of types of products awarded the EU Ecolabel for textile products in September 2023

Type of product	Licences		Products	
	Number	Percentage of the total (%)	Number	Percentage of the total (%)
Textile apparel	27	32	6 947	76
Home/interior textiles	15	18	688	8
Textile cleaning products	14	16	1 012	11
Intermediate products, such as textile fibres, yarns, fabrics and knitted panels	27	32	512	6
Intermediate products, such as non-fibre elements	2	2	4	<1

2344 N.B. The number of licences and products is affected by the reporting methods used by competent bodies. This results in small discrepancies
 2345 compared to the total statistics.

2346 *Source: own elaboration based on data provided by EU Ecolabel Helpdesk*

2347 **7.2 Suggestions for the revision of EU Ecolabel criteria**

2348 When voting on the final draft of the current EU Ecolabel criteria, in November 2013, the Commission and the
 2349 Member States identified some aspects to potentially be assessed during the subsequent revision process of
 2350 the EU Ecolabel criteria. The proposal suggested investigating the extension of the scope to silk, bamboo fibres,
 2351 man-made fibres, as well as the use of additional recycled materials and potential alternatives to the use of
 2352 fluorinated membranes.

2353 The initial questionnaire (see **Table 1** in Section 1) allowed the collection of respondents' opinions on the current
 2354 EU Ecolabel criteria and on the potential topics to investigate during the revision process. Out of 34 respondents,
 2355 10 belonged to the manufacturing industry and 6 to governmental institutions (4 competent bodies of the EU
 2356 Ecolabel), 29% and 18% of the total, respectively. More details about the types of respondents are provided in
 2357 **Table 101** in Section 10.7.2.

¹²¹ EU Ecolabel criteria for textile products. Commission Decision of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products. Commission Decision (2014/350/EU). Available at [this link](#).

2358 In general, current EU Ecolabel criteria are perceived to be too complex, and the application process cumbersome
2359 and bureaucratic, with most of the costs and difficulties being related to the involvement of suppliers, tests and
2360 certifications.

2361 In particular, two competent bodies declared that applicants usually need clarifications/guidance on which
2362 products are included in the scope, and which are the corresponding criteria that these specific products must
2363 meet. A couple of competent bodies reported that some applicants gave up with the application, because they
2364 lacked data and information on their supply chain. This is further confirmation of the features of the supply
2365 chain discussed in Section 5.6.

2366 Respondents had different general perceptions about the interest in the EU Ecolabel criteria: 32% think that
2367 consumers look for textile products with the EU Ecolabel, 52% think that consumers do not look for products
2368 with the EU Ecolabel, and 16% have no opinion.

2369 Respondents to the initial questionnaire gave specific suggestions on the requirements of the current EU
2370 Ecolabel criteria for textile products, reported in Section 10.7.2, **Table 102** to **Table 106**.

2371 General suggestions on how to improve the EU Ecolabel criteria included:

- 2372 • simplification of the application process;
- 2373 • harmonisation of the requirements with the ones of other Type I ecolabels;
- 2374 • use of more third-party certifications to prove compliance with the criteria (e.g. on chemicals)
2375 to streamline the verification process;
- 2376 • facilitating the retrieval of information from the supply chain actors outside the EU;
- 2377 • inclusion of criteria addressing product recyclability and packaging;
- 2378 • alignment with ecodesign requirements developed in the framework of the ESPR.

2379 **7.3 Revision of EU Ecolabel criteria within the ESPR framework**

2380 The establishment of the ESPR brings a change in the revision of the EU Ecolabel criteria for products addressed
2381 by a delegated act of the ESPR. This is the case of the EU Ecolabel criteria for textile products. As mentioned in
2382 Section 1, Article 34(3) of the ESPR establishes synergies between the mandatory ecodesign legislative
2383 framework and the EU Ecolabel, as the EU Ecolabel could be used as proof of compliance to Ecodesign
2384 requirements when ESPR and EU Ecolabel cover the same product groups. The ESPR and EU Ecolabel
2385 requirements must therefore be coherent and synergic to guarantee that products awarded the EU Ecolabel
2386 comply with the ESPR requirements set in the relevant delegated act. Therefore, the revision of the EU Ecolabel
2387 criteria for textile products remains regulated by the EU Ecolabel Regulation, but it should also follow the
2388 framework of the ESPR.

2389 In particular, this means that the EU Ecolabel criteria should complement ecodesign requirements, increasing
2390 the ambition level set by the ESPR, complying with the specificities of the EU Ecolabel Regulation. For instance,
2391 the EU Ecolabel criteria could restrict hazardous chemicals and consider ethical and social aspects where
2392 appropriate, as well as they could forbid or restrict the use of specific chemicals and substances.

2393 The EU Ecolabel criteria for textile products set the product environmental performance at fibre, fabric and
2394 product level:

- 2395 • specific fibres must meet requirements on sourcing and emissions at their production stage;
- 2396 • fabrics must demonstrate that they satisfy specific physical durability parameters;
- 2397 • the product, as well as its components, must meet specific requirements regarding chemical
2398 content.

2399 These EU Ecolabel criteria disregard the final function of the product, e.g. there is no distinction as to whether
2400 a fabric is used as component of a T-shirt, a winter jacket, or a sofa. As explained in Section 3.2, the same
2401 approach cannot be used in the PS because ecodesign requirements must include aspects like durability and
2402 recycled content, which are closely related to the function and use of the textile product. A preliminary exchange
2403 with the textile industry and associations provided important information on this subject. First, a fabric must be
2404 designed considering its final use because it undergoes different wear and tear according to the function and
2405 use of the textile product. Second, the fact that mechanically recycled natural fibres are shorter than virgin

2406 natural fibres significantly affects the physical characteristics of the yarn and consequently of the fabric. The
2407 longer the fibre, the thinner the manufactured yarn can be. Specific yarns are used to produce specific fabrics.
2408 In general, a T-shirt, which requires thin yarns, can contain less mechanically recycled natural fibre than a coat,
2409 which can be manufactured with thicker yarns. This means that the possibility to use a specific quantity of
2410 recycled natural fibres in a textile product depends on the function performed by the textile product. Additionally,
2411 the characteristics of the yarn affect the aesthetic and it influences the comfort provided to the user.

2412 **7.4 Looking for synergies with other Ecolabels used in the EU**

2413 Article 6(f) of the EU Ecolabel Regulation promotes synergy with other officially recognised ISO Type I
2414 environmental labels (**Ecolabels**). In the EU, besides the EU Ecolabel for textile products, there are the following:

- 2415 • Blue Angel – The German Ecolabel: criteria are set by DE-UZ 154 Basic Award Criteria. Edition
2416 January 2023, version 2 ⁽¹²²⁾.
- 2417 • Nordic Swan Ecolabel: criteria are set by ‘Textiles, hides/skins, and leather’. Version 5.4 ⁽¹²³⁾.

2418 **Table 38** reports the scope of these Ecolabels according to the classification adopted in this PS. Besides some
2419 differences, the three Ecolabels include in their scope apparel, home/interior textiles, technical textiles like
2420 cleaning textiles (with the exception of Nordic Swan), and intermediate textile products. Nordic Swan is the only
2421 Ecolabel addressing hide and leather products.

2422 Section 10.7.3 (from **Table 107** to **Table 113**) describes in parallel the topics addressed by the criteria of the
2423 three Ecolabels, which all have the same approach. They set the product environmental performance at fibre,
2424 fabric and product level, as described for the EU Ecolabel criteria in Section 7.3.

2425 The three Ecolabels address the same main topics, even if there are differences in terms of ambition level,
2426 specific substances and test methods used as verification.

2427

¹²² Blue Angel – The German Ecolabel: DE-UZ 154 Basic Award Criteria. Edition January 2023, version 2. Available at [this link](#). Last accessed on 12 January 2024.

¹²³ Nordic Swan Ecolabel: Textiles, hides/skins, and leather. Version 5.4. Available at [this link](#). Last accessed on 12 January 2024.

2428 **Table 38.** Scope of the textile Ecolabels used the most in the EU

Type of product	EU Ecolabel ^(a)	Blue Angel ^(b)	Nordic Swan ^(c)
Apparel	Textile clothing and accessories: clothing and accessories consisting of at least 80% by weight of textile fibres in a woven, non-woven or knitted form.	<ul style="list-style-type: none"> - Textile clothing and textile accessories consisting of at least 90% textile fibres by mass. - Functional clothing in which more than 90% by mass of the material is textile fibres or textile substances that have undergone finishing processes (impregnation, sealing, etc.). 	Apparel and accessories, for example trousers, shirts, jackets, workwear, uniforms, underwear, handkerchiefs, scarves.
Home/interior textiles	Interior textiles: textile products for interior use consisting of at least 80% by weight of textile fibres in a woven, non-woven or knitted form.	<ul style="list-style-type: none"> - Textile products for use inside buildings (house and home textiles incl. uncoated carpets) consisting of at least 90% textile fibres by mass. - Bedding consisting of at least 90% textile fibres by mass. 	Furnishing fabrics (for both private and professional use), such as towels, bedding, curtains, tablecloths, pillows, duvets, plus textiles for use in the furnishing of cars/trains/aircraft/boats.
Technical textiles	Cleaning products: woven or non-woven products made from textile fibres and intended for the wet or dry cleaning of surfaces and the drying of kitchenware	<ul style="list-style-type: none"> - Cleaning textiles: woven or non-woven textiles consisting of at least 90% textile fibres by mass that are designed for the wet or dry cleaning of surfaces or for drying household articles. - Textile products designed for food contact (e.g. waxed cloths). 	NA
Intermediate products	<p>Textile fibres, yarn, fabric and knitted panels: intermediate products intended for use in textile clothing and accessories and interior textiles, including upholstery fabric and mattress ticking prior to the application of backings and treatments associated with the final product.</p> <p>Non-fibre elements: intermediate products that are incorporated into textile clothing and accessories and interior textiles, including zips, buttons and other accessories, as well as membranes, coatings and laminates.</p>	<ul style="list-style-type: none"> - Fibres, yarn, fabric, knitted and crocheted items, non-wovens (including textile composites). - Fibres made of stainless steel and mineral fibres are limited to a maximum of 10% by mass. 	<ul style="list-style-type: none"> - Fibres*, yarn, fabric. * Only the following fibre types can be certified with the Nordic Swan Ecolabel as a certified fibre and only if the relevant fibre requirements of the criteria are met: Organic cotton fibres, wool, and other creature fibres (either sheep, camel, alpaca, or goat), regenerated cellulose produced by closed loop process, flax (linen), silk, bamboo, sisal and other bast fibres. - Durable non-woven textiles that are to be used for apparel and accessories or in interior furnishings.
Other products	NA	Handbags, bicycle bags, backpacks and school bags consisting of at least 70% textile fibres by mass.	<ul style="list-style-type: none"> - Purses, wallets, and bags. - Hide and leather products, such as jackets, trousers or bags, and hides/skins and leather as raw materials for clothing or home furnishings (including for cars/trains/aircraft/boats), from the following species of animal: sheep, goat, cow, horse, pig, elk, deer, and reindeer.

2429 ^(a) EU Ecolabel criteria for textile products. Commission Decision (2014/350/EU).

2430 ^(b) Blue Angel – The German Ecolabel: DE-UZ 154 Basic Award Criteria. Edition January 2023, version 2.

2431 ^(c) Nordic Swan Ecolabel: Textiles, hides/skins, and leather. Version 5.4.

2432 N.B. The classification of the type of products follows the classification adopted in this PS, which does not necessarily correspond to the classification given by the specific Ecolabel. NA: Not available.

2434 Source: own production

2435 **8 Public procurement and current EU voluntary Green Public Procurement** 2436 **criteria**

2437 As mentioned in Section 1, the PS will provide the scientific and technical basis for the future development of
2438 the possible mandatory EU GPP requirements for textile products within the framework of the ESPR. To this
2439 aim, it is important to assess the current public procurement of apparel in the EU (Section 8.1), and the current
2440 status of the voluntary EU GPP criteria, which could provide important learnings for the development of future
2441 mandatory criteria (Section 8.2).

2442 **8.1 Public procurement in the EU**

2443 Public procurement in the EU is regulated by Directive 2014/24/EU⁽¹²⁴⁾, Directive 2014/23/EU⁽¹²⁵⁾ and Directive
2444 2014/25/EU⁽¹²⁶⁾. Monitoring public procurement is currently a challenging task. The first reporting and
2445 monitoring exercise (COM(2021) 245 final)⁽¹²⁷⁾ submitted by Member States showed that all reports contained
2446 more qualitative information than quantitative data. Additionally, the incomplete available data limited the
2447 analysis at EU level (COM(2021) 245 final). The monitoring exercise showed that Member States follow
2448 different methodologies for data collection, and that in several cases there were discrepancies between figures
2449 collected at country level and figures reported on Tenders Electronic Daily (TED)⁽¹²⁸⁾.

2450 TED is the online version of the 'Supplement to the Official Journal' of the EU, which is dedicated to European
2451 public procurement. TED gathers information covering public procurement for the European Economic Area,
2452 Switzerland, and the Republic of North Macedonia from 1 January 2006 to 31 December 2021. These data
2453 include the most important information of the contract notice and contract award notice standard forms, such
2454 as who bought what from whom, for how much, and which procedure and award criteria were used. Therefore,
2455 TED is the only platform that can currently be used to analyse public procurement in the EU.

2456 Generally, the data reported in TED consist of tenders above the procurement threshold of EUR 139 000.
2457 Nevertheless, many public authorities register on TED data of their tenders below this mandatory threshold.

2458 Goods, works, and services that are being procured are classified with Common Procurement Vocabulary (CPV)
2459 codes. CPV codes help procurement personnel to classify their contract notices and to help suppliers find the
2460 notices which are of interest.

2461 Each CPV code nine digits: the first two digits identify the divisions (XX000000-Y); the first three digits identify
2462 the groups (XXX00000-Y); the first four digits identify the classes (XXXX0000-Y); the first five digits identify the
2463 categories (XXXXX000-Y). Each of the last three digits gives a greater degree of precision within each category.
2464 A ninth digit serves to verify the previous digits.

2465 **Table 114** in Section 10.8.1 reports the CPV codes for products in the scope of the PS.

2466 CPV codes related to apparel were investigated in the TED dataset⁽¹²⁹⁾ for 5 years before the pandemic (2015-
2467 2019). This time interval was chosen to investigate the latest evolution of public procurements without
2468 considering the market disruption caused by the COVID-19 pandemic in 2020.

2469 The description of CPV codes reported in the Contract Award allowed the analysis of apparel public procurement
2470 as reported in **Table 39**. The number of Contract Awards procuring apparel in the EU gradually increased from
2471 556 in 2015 to 1 261 in 2019. Products included in the CPV group of 'Occupational clothing, special workwear
2472 and accessories' were the most purchased by public authorities in the investigated years, representing between
2473 42% and 46% of the total procured apparel reported in TED.

¹²⁴ Public Procurement Directive. Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC (Text with EEA relevance)Text with EEA relevance. Available at [this link](#).

¹²⁵ Award of Concession Contracts Directive. Directive 2014/23/EU of the European Parliament and of the Council of 26 February 2014 on the award of concession contracts (Text with EEA relevance) Text with EEA relevance. Available at [this link](#).

¹²⁶ Directive 2014/25/EU of the European Parliament and of the Council of 26 February 2014 on procurement by entities operating in the water, energy, transport and postal services sectors and repealing Directive 2004/17/EC (Text with EEA relevance)Text with EEA relevance. Available at [this link](#).

¹²⁷ Report from the Commission - Implementation and best practices of national procurement policies in the Internal Market. COM/2021/245 final. Available at [this link](#).

¹²⁸ Tenders Electronic Daily (TED). The online version of the 'Supplement to the Official Journal' of the EU, dedicated to European public procurement. Available at [this link](#). Last visited on 12 January 2024.

¹²⁹ Tenders Electronic Daily (TED) (csv subset) – public procurement notices. Available at [this link](#). Last accessed on 12 January 2024.

2474 The analysis showed that the Member States with the highest number of Contract Awards reported in TED were
 2475 France, Germany, Poland and Czechia. More details about the analysis are available in Section 10.8.2.

2476 **Table 39.** Number of Contract Awards procuring apparel in the EU

CPV code	2015		2016		2017		2018		2019	
	N	%	N	%	N	%	N	%	N	%
181XXXXX-X Occupational clothing, special workwear and accessories	241	43	285	46	360	43	431	44	533	42
182XXXXX-X Outerwear	61	11	68	11	93	11	93	10	124	10
183XXXXX-X Garments	57	10	60	10	88	11	99	10	138	11
184XXXXX-X Special clothing and accessories	110	20	47	8	97	12	111	11	142	11
351134XX-X Protective and safety clothing	14	3	37	6	50	6	69	7	103	8
3741XXXX-X Sport goods and equipment	7	1	11	2	8	1	10	1	15	1
3581XXXX-X Individual and support equipment	66	12	108	18	133	16	158	16	206	16
Total	556	100	616	100	829	100	971	100	1 261	100

2477 N.B. N: number of Contract Awards. %: Percentage of Contract Awards compared to the total number of contracts related to textile products.

2478 *Source: own elaboration based on Tenders Electronic Daily (TED) (csv subset) – public procurement notices⁽¹²⁹⁾.*

2479 **8.2 Current voluntary EU Green Public Procurement criteria**

2480 As mentioned in Section 1, the PS will provide the scientific and technical basis for the future development of
 2481 the mandatory EU GPP requirements for textile products within the framework of the ESPR. To this aim, the
 2482 analysis of current voluntary EU GPP criteria⁽¹³⁰⁾ could provide some important learnings.

2483 The current voluntary EU GPP criteria are based on the current EU Ecolabel criteria for textile products. In
 2484 addition to EU Ecolabel criteria, the voluntary EU GPP criteria suggest some requirements about textile services
 2485 related to laundry operations and take-back systems.

2486 The initial questionnaire (see **Table 1** in Section 1) allowed the collection of respondents' opinions on the status
 2487 of the current voluntary EU GPP criteria and on the lessons learnt so far. Out of 34 respondents, 12 belonged
 2488 to the governmental institutions and 6 to the manufacturing industry, 35% and 18% of the total, respectively.
 2489 More details about the types of respondents are provided in **Table 120** in Section 10.8.3.

2490 The questionnaire showed that although many European countries⁽¹³¹⁾ have GPP schemes on textile products,
 2491 it is not possible to understand the uptake of the EU GPP criteria. This is mainly due to their voluntary nature,
 2492 and the lack of a framework to collect this kind of data.

2493 In light of possible future mandatory EU GPP criteria, respondents provided the following suggestions:

- 2494 — Provide a clear and fixed set of requirements, which will allow manufacturers to produce goods
 2495 that meet the demand.
- 2496 — Assess administrative obstacles related to the premature disposal of textile products caused by
 2497 contracting or budget period reasons.
- 2498 — Facilitate the verification of product characteristics to procurers, who are usually not sustainability
 2499 experts.
- 2500 — Establish a framework based on Life Cycle Costing of durable textile products.

¹³⁰ EU GPP criteria for textile products and services. Commission Staff Working Document on EU green public procurement criteria for textiles products and services. SWD(2017) 231 final. Available at [this link](#).

¹³¹ These countries are: Austria, Belgium, Czechia, Denmark, Finland, France, Germany, Hungary, Ireland, Italy, Malta, the Netherlands, Portugal, Sweden and Norway.

2501 — Establish a framework which considers environmental and social aspects in the whole value chain,
2502 possibly promoting the purchase of second-hand products.

2503 — Support public authorities to develop a common strategy in purchasing and disposing of textile
2504 products.

2505 The positions expressed by the respondents to the initial questionnaire are complemented by COM(2021) 245
2506 final ⁽¹²⁷⁾. This Communication lists the main aspects hindering the adoption of current voluntary EU GPP criteria:

2507 • the lack of legal obligation;

2508 • the lack of legal certainty on the correct interpretation of the requirement for a 'link to the
2509 subject matter of the contract' and the general fear of litigation;

2510 • the lack of data proving the economic benefits of applying GPP criteria;

2511 • the difficulty to monitor their application;

2512 • the lack of specific knowledge and skills of the public servants engaged in tendering
2513 procedures;

2514 • the fact that GPP may be perceived as an obstacle to competition, specifically restricting SME
2515 participation in public tendering.

2516

DRAFT - work in progress

2517 **9 Technologies**

2518 This section addresses the Task 4 of the MEErP providing a **general technical analysis of the products in**
2519 **the scope**. This analysis aims to describe the following types of product technologies:

- 2520 — The Base Case of technologies (BC), which is the average product on the market.
- 2521 — The Best Available Technologies (BAT), which have the most ambitious performances available on
2522 the market. BAT are implemented at scale.
- 2523 — The Best Not yet Available Technologies (BNAT), which have the most ambitious performances,
2524 but they are not implemented at scale, therefore they are considered not available on the market.

2525 In this context, product technologies are products with defined characteristics related to a specific product
2526 aspect reported in Article 5(1) of the ESPR, such as durability, reparability, etc.

2527 Section 9.1 identifies the relevant product aspects for the products in scope, and groups those that can be
2528 potentially addressed with the same product parameters via future requirements. This approach aims to
2529 streamline the multi-criteria analysis that will be performed in the following Tasks of the PS.

2530 Section 9.2 describes the product technologies for each relevant product aspect, analysing the complexity of
2531 their ecosystems.

2532 Section 9.3 reports on the influence that product aspects have upon each other and proposes product categories
2533 based on the analysis performed in section 9.2. Information reported in Tasks 1 to 4 will feed the models in
2534 Tasks 5 and 6, which will describe the base cases and design options, respectively. Each product category
2535 reported in section 9.3 will be described with a representative product, which will be used as reference for all
2536 products belonging to the specific category.

2537 The analysis performed in Section 9 goes beyond the directions reported in the MEErP. It aims to address Task
2538 4 of the MEErP in the context of the ESPR.

2539 **9.1 Relevant product aspects**

2540 Article 5(1) of ESPR establishes that, in order to address environmental impacts of products, the ecodesign
2541 requirements in the delegated acts shall improve a specific list of product aspects. This list includes 16 product
2542 aspects:

- 2543 (a) durability
- 2544 (b) reliability
- 2545 (c) reusability
- 2546 (d) upgradability
- 2547 (e) reparability,
- 2548 (f) the possibility of maintenance and refurbishment
- 2549 (g) the presence of substances of concern
- 2550 (h) energy use and energy efficiency
- 2551 (i) water use and water efficiency
- 2552 (j) resource use and resource efficiency
- 2553 (k) recycled content
- 2554 (l) the possibility of remanufacturing
- 2555 (m) recyclability
- 2556 (n) the possibility of recovery of materials
- 2557 (o) environmental impacts, including carbon footprint and environmental footprint
- 2558 (p) expected generation of waste

2559 Article 5 of ESPR also establishes that ecodesign requirements in the delegated acts shall be based on the
2560 above product aspects, when they are relevant to the product group concerned. Therefore, this section aims to
2561 evaluate the relevance of the 16 product aspects in the context of textile apparel. To this aim, two main actions
2562 were performed:

- 2563 — Discarding product aspects that are not relevant in the context of textile apparel;
- 2564 — Grouping product aspects that can be addressed together in order to streamline the following steps
2565 of the study.

2566 Section 9.1.1 describes in general methodology followed, whereas Section 9.1.2 describes the specific steps
2567 involved. Finally, section 9.1.3 describes the proposed grouping of product aspects.

2568 **9.1.1 Methodology**

2569 The analysis undertaken started from the list of 16 product aspects in Article 5 of ESPR, and aimed to: (a)
2570 exclude product aspects which were not relevant for textile apparel, and (b) group product aspects that could
2571 be potentially addressed with the same product parameters via future requirements. This approach streamlines
2572 the multi-criteria analysis that will be performed in the following tasks of the PS.

2573 Non-relevant product aspects were excluded following three steps:

- 2574 • Generic description of textile apparel,
- 2575 • Guiding questions, and
- 2576 • Qualitative assessment.

2577 First, textile apparel were described considering the following characteristics: final vs intermediate product;
2578 complex vs non-complex product; and durable vs consumable product. This description set the understanding
2579 of the product characteristics that are crucial for steps 2 and 3. Second, key guiding questions identified product
2580 aspects that evidently were not relevant for textile apparel. Third, a qualitative assessment investigated
2581 technical, socioeconomic and environmental dimensions. This qualitative assessment was based on information
2582 found in the literature and did not aim to perform a comprehensive analysis given this will be performed in the
2583 following tasks of the PS. The purpose of the qualitative assessment is to further refine the justification to
2584 exclude product aspects that are evidently not relevant for textile apparel, and to serve as a basis for the
2585 grouping of product aspects.

2586 Finally, only the relevant product aspects were grouped taking into account the characteristics of each product
2587 aspect and the product parameters reported in Annex I to ESPR. This grouping streamlined the following steps
2588 of the PS because it allowed the use of the same parameters to address more than one product aspect.
2589 Therefore, this grouping decreased the number of relevant product aspects to be investigated in the analysis
2590 of technologies (see section 9.2) and Tasks 5 and 6 of the PS.

2591 **9.1.2 Exclusion of non-relevant product aspects**

2592 This section followed the methodology described in section 9.1.1 and identifies product aspects that are
2593 considered not relevant for textile apparel.

2594 **Generic description of textile apparel**

2595 Textile apparel were screened following three sets of characteristics:

- 2596 — Intermediate product or final product
- 2597 — Complex product or non-complex product
- 2598 — Durable product or consumable product

2599 According to Article 2(3) of the ESPR, an intermediate product is a product that requires further manufacturing
2600 or transformation such as mixing, coating or assembling to make it suitable for customers. Conversely, a final
2601 product is understood to be a product that is already suitable for users. One of the main differences between
2602 intermediate and final products is the lifecycle stages that can be considered. While all lifecycle stages could
2603 be evaluated in the assessment of final products, in the case of intermediate products a cradle-to-gate
2604 approach is followed, where the use stage is disregarded and the end-of-life stage is only partially assessed.
2605 Product aspects that serve to reduce the impacts of use and end-of-life stages would be considered as not

2606 relevant for intermediate products. By definition, textile apparel belongs to **final** products, because it is suitable
2607 for users.

2608 According to Council Regulation (EC) 6/2002 (¹³²), a complex product is a product which is composed of multiple
2609 components which can be replaced permitting disassembly and re-assembly of the product. In contrast, non-
2610 complex products do not include components or priority parts, thus they do not have components that can be
2611 replaced. A product's priority part is functionally important and is likely to fail or to be upgraded. The part will
2612 have high priority if it is necessary to deliver either primary (necessary to fulfil the intended use) or secondary
2613 functions (necessary to enable, supplement or enhance the primary function) (Cordella, Alfieri, et al., 2019).

2614 Textile apparel belongs to **complex** products, because often it is composed of multiple components which can
2615 be replaced permitting disassembly and re-assembly of the product. Additionally, the complexity of textile
2616 apparel relies on the numerous fibre types used in blends and processed in several ways along spinning, fabric
2617 manufacturing and finishing processes (¹³³). Therefore, even textile apparel that is not made of components is
2618 considered to be a complex product.

2619 Finally, textile apparel belongs to **durable** products because it is conceived and designed to last. Conversely,
2620 once used, consumable products are expected to be consumed or discarded.

2621 Therefore, textile apparel encompasses final, complex and durable products whose relevant product aspects
2622 should consider all life-cycle stages, the technological product complexity and its durable function.

2623 **Guiding questions**

2624 Key guiding questions were used to identify product aspects that evidently are not relevant for textile apparel.
2625 These questions addressed only the circularity aspects and did not focus on substances of concern, generic
2626 environmental impacts or use and efficiency of water, energy and resources, because these product aspects
2627 were considered already relevant based on the analysis performed in Section 3.1.3 and 3.3.

2628 Durability

2629 *Is the functionality of the textile apparel expected to be provided for a long lifetime and/or for a high amount*
2630 *of multiple uses?*

2631 Yes, it is. Therefore, durability can be considered a relevant product aspect.

2632 Reliability

2633 *Can the use of the textile apparel or a part/component thereof cause a limiting event in the product?*

2634 Yes, fatigue and or ageing of the product (or of a specific part/component) due to its use can cause a limiting
2635 event that prevents its use. Therefore, reliability can be considered a relevant product aspect.

2636 Reusability

2637 *Could the reuse of textile apparel potentially entail a health risk?*

2638 In general, reuse of textile apparel do not entail health risks for consumers. Therefore, reusability can be
2639 considered a relevant product aspect.

2640 Upgradability

2641 *Would it be technically feasible to upgrade a priority part that could potentially stop functioning, that is already*
2642 *not allowing textile apparel to perform at its fullest and/or there is potential to redesign the product in a way*
2643 *that can be upgraded?*

2644 Yes, it is technically feasible to upgrade a priority part in an item of textile apparel. For instance, reassembling
2645 a zipper of better quality. It is also possible to redesign textile apparel in a way that they can be upgraded. For
2646 instance, improving their ability for disassembly. Therefore, upgradability can be considered a relevant aspect.

2647 Repairability

¹³² Council Regulation (EC) No 6/2002 of 12 December 2001 on Community designs. Available at [this link](#).

¹³³ A description of this complexity is reported in Section 9.2.1.1.

- 2648 *Would it be technically feasible to repair/replace the no longer functioning priority part and/or there is potential*
 2649 *to redesign the product in a way that can be repairable?*
- 2650 Yes, it is. Therefore, repairability can be considered a relevant aspect.
- 2651 Possibility of maintenance
- 2652 *Will the use and/or storage of textile apparel in specific conditions maintain its expected lifetime or extend it?*
 2653 *Would it be possible to postpone a limiting event by performing maintenance activities to any of the*
 2654 *parts/components of textile apparel?*
- 2655 Yes, appropriate use and storage of textile apparel can extend their expected lifetime. Moreover, maintenance
 2656 activities (proper washing, drying and ironing) can postpone limiting events. Therefore, possibility of
 2657 maintenance can be considered a relevant aspect.
- 2658 Possibility of refurbishment
- 2659 *Is it technically feasible to refurbish textile apparel by the manufacturer and/or third party operators?*
- 2660 Yes, it is. Therefore, possibility of refurbishment can be considered a relevant aspect.
- 2661 Recycled content
- 2662 *Is there a waste stream from which material can be recycled and reintroduced in the manufacturing process of*
 2663 *textile apparel?*
- 2664 *Is the waste stream available for using it in the manufacturing of textile apparel?*
- 2665 *Is the waste stream generated within an acceptable distance from the recycling and manufacturing sites?*
- 2666 *Can the recycled material be used for the manufacturing of textile apparel with the same or an acceptable*
 2667 *minimum quality to keep the properties and function of the product?*
- 2668 Yes, there is a waste stream of textile apparel from which material can be recycled. This material is available
 2669 for using in the manufacturing of textile apparel. Generally, the waste stream is not generated close to the
 2670 most common sites for recycling and manufacturing of products. Only post-industrial textile waste is generated
 2671 at manufacturing facilities. The quality of mechanically recycled fibres is generally lower than that of virgin
 2672 fibres. Future developments of chemical recycling techniques could produce recycled fibres with the same
 2673 quality of the virgin fibres. The possibility to incorporate recycled content largely depends on the type of fibre
 2674 concerned: chemical recycling of cotton waste cannot generate new cotton fibres, but it can generate chemically
 2675 modified (regenerated) fibres, such as man-made cellulosic fibres (MMCFs). Therefore, recycled content can be
 2676 considered a relevant aspect.
- 2677 Possibility of remanufacturing
- 2678 *Would it be technically possible to disassemble textile apparel without damaging those components or parts*
 2679 *that could have potential to be used in a new product and/or would be possible to design the product in a way*
 2680 *that allows it?*
- 2681 Yes, depending on the specific product and manufacturing process it may be technically possible to disassemble
 2682 textile apparel so that some parts are used in a new product. It is also possible to redesign textile apparel in a
 2683 way that they can be remanufactured. Therefore, possibility of remanufacturing can be considered a relevant
 2684 aspect.
- 2685 Recyclability
- 2686 *Is textile apparel made of components/parts or materials that can or have potential to be separated and*
 2687 *recycled?*
- 2688 *Is there available waste derived from the product from which materials can be recovered and recycled?*
- 2689 *Is the technology to recycle textile apparel' material available? Is there an existing or potential demand for the*
 2690 *recycled material?*
- 2691 Yes, textile apparel is made of materials that can be separated and recycled. There is available waste derived
 2692 from textile apparel from which materials can be recovered and recycled. Some recycling technologies are
 2693 already available. There is certain demand for material recycled from textile apparel, although it is limited due
 2694 to non-competitive prices of recycled fibres. Therefore, recyclability can be considered a relevant aspect.
- 2695 Possibility of recovery of materials

2696 *Besides preparation for re-use and recycling, is there another way to recover materials from the products in the*
 2697 *scope?*

2698 No, the only way to recover materials from textile apparel is via preparation for re-use and recycling. Therefore,
 2699 possibility of recovery of materials via any other route can be considered a non-relevant aspect.

2700

2701 The outcome of the qualitative analysis based on key guiding questions is that only the product aspect
 2702 'possibility of recovery of materials' can be considered as non-relevant at this point of the analysis.

2703 **Qualitative assessment**

2704 The qualitative assessment investigated technical, socioeconomic and environmental dimensions of the 15
 2705 relevant product aspects screened in in the guiding questions. This qualitative assessment used information
 2706 gathered through literature review and did not include a comprehensive analysis because this is the aim of the
 2707 following steps of the PS, mostly the analysis of technologies (section 9.2), Task 5 and Task 6.

2708 The qualitative assessment aimed to further refine the exclusion of product aspects that are evidently not
 2709 relevant for textile apparel, and to serve as a basis for the grouping of product aspects. In this way, the following
 2710 steps of the PS can exclude their assessment for a streamlined process.

2711 The qualitative assessment included:

- 2712 — The technical dimension, which addressed product characteristics and/or improvement potential
 2713 from a technical perspective.
- 2714 — The socioeconomic dimension, which addressed the economic feasibility, impacts on job
 2715 loss/creation and user-related aspects.
- 2716 — The environmental dimension, which addressed environmental impacts caused by the consumption
 2717 of the product and potential improvements.

2718 The results of the qualitative assessment showed that all screened product aspects had at least one dimension
 2719 that resulted relevant for textile apparel. Section 10.9.1 in the Annex provides details of the qualitative
 2720 assessment.

2721 Finally, **Table 40** reports the outcome of the analysis aiming to exclude non-relevant product aspects.

2722 **Table 40.** Relevance of product aspects for textile apparel

Relevant product aspects	Non-relevant product aspects
Durability	Possibility of recovery of materials
Reliability	
Reusability	
Upgradability	
Repairability	
Possibility of maintenance and refurbishment	
Presence of substances of concern	
Energy use and energy efficiency	
Water use and water efficiency	
Resource use and resource efficiency	
Recycled content	
Possibility of remanufacturing	
Recyclability	
Environmental impacts	
Expected generation of waste	

2723 *Source: own production*

2724 **9.1.3 Grouping of relevant product aspects**

2725 Grouping of relevant product aspects aimed to streamline the multi-criteria analysis that will be performed in
 2726 the following tasks of the PS. Each product aspect represents a criterion of the analysis. If the number of these
 2727 criteria decreases, the analysis is more efficient.

2728 To this aim, **Table 41** reports some of the characteristics typical for specific product aspects, using the results
 2729 of the qualitative assessment performed in section 9.1.2. Additionally, **Table 42** reports the direct interaction

2730 between product aspects and product parameters reported in Annex I to the ESPR. The product aspects that
 2731 have common characteristics were grouped because they can be addressed via the same product parameters.

2732 **Table 41.** Product aspects and required characteristics of products

Product aspect	Required characteristics of products (Annex I of ESPR)
Durability	A highly durable item of textile apparel should have, among others, the following characteristics: high resistance to abrasion, tearing, pilling, colour-fastness, soiling, dimensional changes and seam slippage. It should have easily accessible information for repair and maintenance. Moreover, a durable product should be desirable to the user for a long time. If textile apparel is modular, its priority parts should have easy physical access. Additionally, the process, tools and fasteners required for disassembly should be simple.
Reliability	A highly reliable item of textile apparel should have, among others, the following characteristics: high resistance to abrasion, tearing, pilling, colour-fastness, soiling, dimensional changes and seam slippage. Additionally, a reliable product should be desirable to the user for long time.
Reusability	A highly reusable item of textile apparel should have, among others, the following characteristics: high resistance to abrasion, tearing, pilling, colour-fastness, soiling, dimensional changes and seam slippage. It should have easily accessible information for repair and maintenance. Moreover, a durable product should be desirable to the user for a long time. If textile apparel is modular, its priority parts should have easy physical access. Additionally, the process, tools and fasteners required for disassembly should be simple.
Upgradability	A highly upgradable item of textile apparel should have, among others, the following characteristics: it should be highly modular in design, with easy physical access to priority parts. The process, tools and fasteners required for disassembly should be simple.
Repairability	A highly repairable item of textile apparel should have, among others, the following characteristics: it should be highly modular in design, with easy physical access to priority parts. The process, tools and fasteners required for disassembly should be simple. The product should also have access to repair services.
Possibility of maintenance	An item of textile apparel with possibilities for maintenance should have, among others, the following characteristics: it should have easily accessible information for care in terms of cleaning, drying, ironing and storing the product.
Possibility of refurbishment	An item of textile apparel with possibilities for refurbishing should have, among others, the following characteristics: it should be highly modular in design, with easy physical access to priority parts. The process, tools and fasteners required for disassembly should be simple.
Presence of substances of concern	An item of textile apparel with good information on presence of substances of concern is accompanied with a comprehensive list of all the substances of concern that it contains (above specified thresholds, as appropriate). Substances are used in order to give specific characteristics to the product, facilitate the manufacturing process or to help during the treatment of the product when it becomes waste. Consequently, substances of concern could affect durability, recyclability and environmental impacts.
Energy use and energy efficiency	An item of textile apparel with low energy use or high energy efficiency should (1) be manufactured with low energy consumption, (2) use materials which are not energy intensive in their manufacturing stage, (3) allow to reduce the energy consumption during the use phase in laundering, drying and ironing activities, and (4) be treated at its end of life with non-energy intensive techniques.
Water use and water efficiency	An item of textile apparel with low water use or high water efficiency should (1) be manufactured with low water consumption, (2) use materials which are not water intensive in their manufacturing stage, (3) allow to reduce the water consumption during the use phase in laundering activities, and (4) be treated at its end-of-life with non-water intensive techniques.
Resource use and resource efficiency	An item of textile apparel with low resource use or high resource efficiency should, among other things, use materials that throughout its life cycle stages (1) consume raw materials produced in sustainable way, (2) indirectly use land assuring its future use with the same activity, (3) use ecosystems without damaging their biodiversity and general balance.
Recycled content	An item of textile apparel with recycled content should contain recycled materials, in substitution of virgin materials. The recycled material should come from recyclable textile products to meet the fibre-to-fibre recycling objectives identified by the EU Textile Strategy.
Possibility of remanufacturing	An item of textile apparel with possibilities for remanufacturing should have, among others, the following characteristics: it should be highly modular in design, with easy physical access to priority parts. The process, tools and fasteners required for disassembly should be simple. It should have easily accessible information for repair.

Product aspect	Required characteristics of products (Annex I of ESPR)
Recyclability	In order to be recyclable, an item of textile apparel should meet all the following five characteristics when it becomes waste: (1) it can be effectively collected; (2) it can be sorted, i.e. segregated from other waste and sent to the subsequent recycling pathways; (3) it can be prepared for recycling, or can be sent directly recycling without specific preparation; (4) its fibre content can fully be used as feedstock for one or more recycling techniques to produce recycled fibres usable in textile products; (5) it has no elements or substances that disrupt the collection, sorting, preparation for recycling and recycling, or that limit the use of the recycled fibre.
Environmental impacts	An item of textile apparel with low environmental impact should have, among others, the following characteristics: in all life cycle stages it should (1) use a limited quantity of energy and water, (2) release directly and indirectly a limited quantity of pollutants (e.g. SO _x , NO _x , COD, microplastics) into the environment, use in the product and emit into the environment minimum possible amounts of substances of concern.
Expected generation of waste	An item of textile apparel with low expected generation of waste should have, among others, the following characteristics: (1) in all life cycle stages, it should generate minimal amounts of waste, (2) it should be designed and manufactured to prevent the generation of post-industrial waste, (3) ideally it should be designed to increase emotional attachment to the user to limit the demand for new products, (4) it should be durable to postpone the demand for new products.

2733 **Table 42.** Interaction between product aspects and product parameters reported in Annex I to ESPR

Product parameters	Product parameters															
	Durability	Reliability	Reusability	Upgradability	Repairability	Possibility of maintenance	Possibility of refurbishment	Presence of substances of concern	Energy use and energy efficiency	Water use and water efficiency	Resource use and resource efficiency	Recycled content	Possibility of remanufacturing	Recyclability	Environmental impacts	Expected generation of waste
Product's guaranteed lifetime																
Technical lifetime																
Mean time between failures																
Indication of real use information on the product																
Resistance to stressor ageing mechanisms																
Characteristics, availability, delivery time and affordability of spare parts																
Modularity																
Compatibility with commonly available tools and spare parts																
Availability of repair instructions																
Availability maintenance instructions																
Number of materials and components used																
Use of standard components	Not applicable to textile apparel															

Product parameters	Durability	Reliability	Reusability	Upgradability	Repairability	Possibility of maintenance	Possibility of refurbishment	Presence of substances of concern	Energy use and energy efficiency	Water use and water efficiency	Resource use and resource efficiency	Recycled content	Possibility of remanufacturing	Recyclability	Environmental impacts	Expected generation of waste
Use of component and material coding standards for the identification of components and materials																
Number and complexity of processes and whether specialised tools are needed																
Ease of non-destructive disassembly and reassembly																
Conditions for access to product data	Not applicable to textile apparel															
Conditions for access to or use of hardware and software needed	Not applicable to textile apparel															
Conditions of access to test protocols or not commonly available testing equipment	Not applicable to textile apparel															
Availability of guarantees specific to remanufactured or refurbished products																
Conditions for access to or use of technologies protected by intellectual property rights																
Use of easily recyclable materials																
Safe, easy and non-destructive access to recyclable components and materials																
Material composition and homogeneity																
Possibility for high purity sorting																
Avoidance of technical solutions detrimental to reuse																
Avoidance of technical solutions detrimental to upgrading																
Avoidance of technical solutions detrimental to repair																

Product parameters	Durability	Reliability	Reusability	Upgradability	Repairability	Possibility of maintenance	Possibility of refurbishment	Presence of substances of concern	Energy use and energy efficiency	Water use and water efficiency	Resource use and resource efficiency	Recycled content	Possibility of remanufacturing	Recyclability	Environmental impacts	Expected generation of waste
Avoidance of technical solutions detrimental to maintenance																
Avoidance of technical solutions detrimental to refurbishment																
Avoidance of technical solutions detrimental to remanufacturing																
Avoidance of technical solutions detrimental to recycling																
Use of substances, in particular the use of substances of concern																
Use or consumption of energy, in one or more life cycle stages of the product																
Use or consumption of water, in one or more life cycle stages of the product																
Use or consumption of other resources, in one or more life cycle stages of the product																
Use or content of recycled materials and recovery of materials																
Use or content of sustainable renewable materials																
Weight and volume of the product and its packaging																
Incorporation of used components																
Quantity, characteristics and availability of consumables needed for proper use																
Environmental footprint of product																
Carbon footprint of product																
Material footprint of product																
Microplastic and nanoplastic release																
Emissions to air																

Product parameters	Durability	Reliability	Reusability	Upgradability	Repairability	Possibility of maintenance	Possibility of refurbishment	Presence of substances of concern	Energy use and energy efficiency	Water use and water efficiency	Resource use and resource efficiency	Recycled content	Possibility of remanufacturing	Recyclability	Environmental impacts	Expected generation of waste
Emissions to water																
Emissions to soil																
Noise																
Amounts of waste generated																
Functional performance																
Reduction of material consumption																
Load and stress optimisation of structures	Not applicable to textile apparel															
Integration of functions within the material or into a single product component	Not applicable to textile apparel															
Use of lower density or high strength materials and hybrid materials																
Waste reduction																

2734 Coloured cells highlight relevant product parameters for specific product aspects.

2735 Source: JRC own elaboration.

2736 In the context of textile apparel, the product aspects of durability, reliability and reusability were grouped
 2737 because they have common characteristics and have overlapping aims which can be reached with the same
 2738 actions. A durable product is likely to be reliable and reusable. **Physical durability** is taken as the leading
 2739 aspect of this group because it focusses on intrinsic measurable properties of the product which are reported
 2740 in Annex I to ESPR and allow to indirectly address reliability and reusability. Conversely, emotional durability
 2741 refers to the emotional attachment that the user has to the product and it does not fall into the definition of
 2742 “durability” reported in the ESPR (**Table 2**). Although emotional durability is not a product aspect, its relevance
 2743 to the life-cycle environmental impacts of the textile apparel was largely taken into account in the following
 2744 sections of the PS.

2745 Although the product aspect of **maintenance** is strictly connected to the physical durability, it was addressed
 2746 separately because it is mostly related to information to be provided to the user, rather than connected to the
 2747 physical performance of the product.

2748 The third group of product aspects is led by **repairability** which has a definition and characteristics that closely
 2749 relates to upgradability, possibility of refurbishment, and possibility of remanufacturing. When addressing
 2750 repairability with product modularity, use of standard components, and the other relevant parameters, the
 2751 product aspects of upgradability, refurbishment and remanufacturing is indirectly addressed.

2752 The expected **generation of waste** is considered as a product aspect to be addressed individually, providing
 2753 the feedstock for the recycling system.

2754 The fifth group gathers **recyclability and recycled content**, because recycled material should come from
 2755 recyclable textile products. From this perspective, these product aspects share the same ecosystem and are

2756 affected by the same process techniques, business models, legislation, and industrial practices. More details
2757 about this will be provided in the analysis of technologies in section 9.2.5.

2758 The product aspect addressing **environmental impacts** includes the assessment of use (and efficiency) of
2759 water, energy and resources, which are the fundamental elements affecting the environment (see section 3.3).
2760 The following steps of the PS will develop the environmental and economic model that will take into account
2761 all resources used in the entire life-cycle of the textile apparel. In particular, the part of the model related to
2762 raw material production will gather available data coming from the most commonly used practices. This
2763 approach will support the identification of resource use that less negatively impact the environment in this
2764 specific stage. Additionally, Task 5 will report a specific analysis on microplastics release in the whole life-cycle
2765 of textile products.

2766 Although the **presence of substances of concern** strongly affects other product aspects, it is suggested to
2767 be addressed separately because it mainly refers to information requirements to be reported by the economic
2768 operator placing/making available the product on the market. Substances are used to give specific
2769 characteristics to the product, facilitate the manufacturing stage, or affects the treatment of the product when
2770 it becomes waste. Consequently, substances of concern could directly affect the physical durability, the
2771 recyclability, the recycled content and the environmental impacts.

2772 Therefore, the next stages of the PS will address the following groups of relevant product aspects:

- 2773 — Physical durability, which includes physical durability, reliability and reusability;
- 2774 — Maintenance;
- 2775 — Repairability, which includes repairability, upgradability, possibility of refurbishment, and possibility
2776 of remanufacturing;
- 2777 — Generation of waste;
- 2778 — Recyclability and recycled content;
- 2779 — Environmental impacts, which include environmental impacts, energy use and energy efficiency,
2780 water use and water efficiency, resource use and resource efficiency; and
- 2781 — Presence of substances of concern.

2782 **9.2 Analysis of technologies**

2783 For each relevant product aspect, this section describes the product technologies following a three-step analysis:

- 2784 — Step 1: analysis of the ecosystem related to the specific product aspect;
- 2785 — Step 2: identification of a methodology to describe the product technologies;
- 2786 — Step 3: description of the product technologies based on previous steps. This description could be
2787 supported by a categorization to best describe the products in the scope.

2788 In step 1, the ecosystem related to the specific product aspect was studied considering four elements:

- 2789 • the **process techniques**, which are the instruments and practices used along the stages of
2790 the product's life-cycle to manufacture or treat product technologies,
- 2791 • the **business models** of economic operators in the ecosystem,
- 2792 • the **user behaviour**,
- 2793 • the **legislative framework** and **industrial best practices**.

2794 In step 2, the methodology used was specific to the product aspect and it was based on the analysis of the
2795 specific ecosystem. In step 3, the categorization aimed to gather all products that can be subject to the same
2796 future requirements.

2797 Sections 9.2.1, 9.2.2 and 9.2.3 address the extension of product lifespan in term of physical durability,
2798 maintenance and repairability, respectively. Section 9.2.4 analyses the waste generation, while section 9.2.5
2799 addresses the recirculation of materials in terms of recyclability and recycled content. Section 9.2.6 analyses
2800 the environmental impacts, including the use and efficiency of water and energy. Finally, section 9.2.7 addresses
2801 the presence of substances of concern.

2802 **9.2.1 Physical durability**

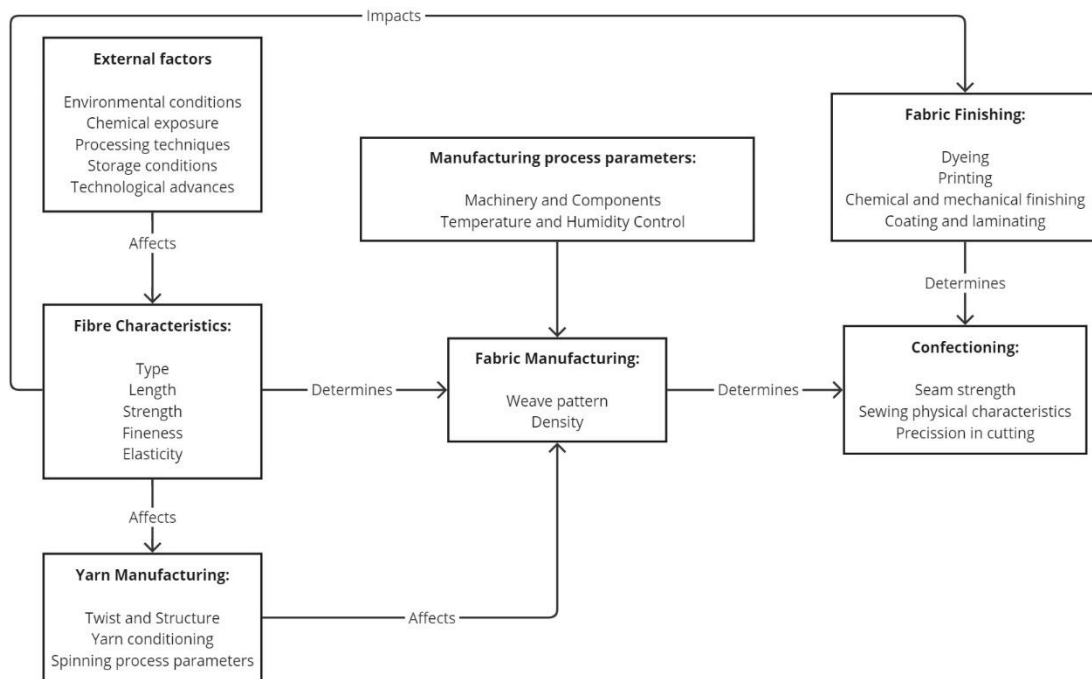
2803 This section describes the physical durability of textile apparel, focussing on measurable intrinsic properties
2804 linked to the physical resistance against degrading factors due to use and maintenance habits. These degrading
2805 factors generate failures, such as fabric breakdown, pilling, loss of dimensional stability and discolouration
2806 (Cooper and Claxton, 2022c).

2807 9.2.1.1 The ecosystem of physical durability

2808 *Manufacturing factors and process techniques*

2809 The characteristics of the product technologies related to physical durability are strictly related to all process
2810 techniques involved in the manufacturing stage, as well as the choice of raw materials and the choice of
2811 function of the product made at the design stage.

2812 **Figure 21** shows a simplification of the complex relations among the numerous factors influencing the physical
2813 durability of textile apparel. These factors are grouped according to the specific process during the
2814 manufacturing stage. The fibre characteristics directly affect yarn and fabric manufacturing and finishing
2815 processes. At the same time, there are external factors such as environmental and storage conditions, and
2816 chemical exposure that directly affect the characteristics of the fibres. During the manufacturing of the yarn,
2817 the chosen spinning method provides specific levels of evenness, softness and strength. Moreover, spinning
2818 parameters such as the twist level, spinning tension, temperature and humidity control play a crucial role on
2819 the characteristics of the yarn. The fabric manufacture is strictly related to the final application: weaving is
2820 generally used for relatively more rigid and stronger fabrics (e.g. used in pants and shirts), whereas knitting is
2821 usually used for relatively more elastic fabrics (e.g. used in T-shirts and dresses). Fabric manufacturing is
2822 affected by the specific process techniques used and the ability to control temperature and humidity during the
2823 process. During the finishing processes, dyeing and printing give colour-related characteristics, whereas
2824 chemical and mechanical finishing provide functional and physical properties, respectively. Fabric
2825 manufacturing and finishing directly affect the confectioning process where the physical characteristics of
2826 sewing, the precision of cuts and seam strength play an important role in the final appearance and physical
2827 durability of the textile apparel. Section 10.9.2 provides more details about the complexity simplified in **Figure**
2828 **21**.

Figure 21. Overview of the main factors influencing the physical durability of textile apparel

2830

2831

Source: Own production based on AITEX's knowledge and (Rahman et al., 2023)

2832 *User behaviour*

2833 Users influence the physical durability of textile apparel mainly at the moment of the purchase when choosing
 2834 a product with specific characteristics ⁽¹³⁴⁾. Therefore, users set a specific market demand for future products
 2835 to be placed on the market. This is particularly true whenever the product is placed on the market by a company
 2836 following the consumer-led operation model (see Section 5.5).

2837 The analysis of user behaviour in Section 6 revealed that product quality is an important parameter taken into
 2838 consideration when users buy an item of textile apparel. Physical durability is considered one of the main quality
 2839 aspects. However, when choosing a textile apparel in physical shops, users are driven by their subjective
 2840 judgement based on the look and touch. When buying online, users still rely on the possibility to check the look
 2841 and touch of the textile apparel if there is the possibility to return it.

2842 Price is another important aspect that users take into account when buying textile apparel, but they generally
 2843 do not consider it an indicator of quality, and therefore they also do not consider it to be an indicator of physical
 2844 durability (Section 6). At the same time, the literature revealed that relatively cheap products are disposed of
 2845 more frequently than higher-priced ones (Morgan and Birtwistle, 2009a; Joy et al., 2012a). However, no research
 2846 was found analysing the potential relation between price of products and their intrinsic durability properties.

2847 All in all, although physical durability refers to intrinsic properties of textile apparel, currently users have no way
 2848 to access this information.

2849 *Legislative frameworks and industrial practices*

2850 Currently, the industry uses numerous standards to measure specific parameters related to the physical
 2851 durability of textile apparel (Section 4.4). In France, economic operators placing products generating waste on

¹³⁴ Users also affect the actual lifespan of the products with their maintenance practices, but this topic is addressed in section 9.2.2, where the product aspect of maintenance is analysed.

2852 the French market are requested by the Law n° 2020-105⁽¹³⁵⁾ to report information about durability of the
2853 product. It is unknown to the authors what specific parameters and framework should be used to describe the
2854 physical durability of textile apparel in this context.

2855 *Business models*

2856 Companies in the textile apparel industry adopt numerous business models (Sections 5.5. and 5.6). Some of
2857 them promote physically durable products and tend to communicate the intrinsic characteristics of the textile
2858 apparel. This approach is most common among economic operators dealing with sportswear and workwear.
2859 Other companies place on the market textile apparel with high frequency, either to satisfy the demand of
2860 customers for new items, or to promote consumption of new collections. Usually, economic operators using this
2861 business model would not promote physical durability of the textile apparel because the item would be changed
2862 or disposed of by the user relatively soon after purchase.

2863 9.2.1.2 Natural vs synthetic fibres – duality or complexity?

2864 The physical durability of textile apparel is often perceived to be higher for products made with synthetic fibres,
2865 compared to those made with natural fibres. This perception may be attributed to the fact that synthetic fibres
2866 are man-made fibres designed to be stronger than natural fibres (**Table 121** in section 10.9.2 reports
2867 comparison on characteristics). However, the reality is more complex and the factors influencing the physical
2868 durability of textile apparel are multifaceted and interconnected (Section 9.2.1.1 and Section 10.9.2). In practice,
2869 a textile apparel with a dense cotton fabric and well-constructed seams can outlast a polyester-based product
2870 with loosely woven fabric and inadequately constructed seams. Additionally, each fibre and fibre blend has
2871 specific properties used for particular applications.

2872 To meet consumer needs, textile apparel must satisfy three key requirements: (1) perform a specific function,
2873 (2) meet consumer taste and comfort expectations, and (3) be reasonably priced. Achieving these requirements
2874 involves a complex engineering process that takes into account the various factors influencing physical
2875 durability. The diverse range of fibres, each with unique characteristics, plays a crucial role in providing specific
2876 properties to textile apparel.

2877 As a result, the majority of textile apparel on the EU market is made from blends of natural and chemical fibres
2878 (48-60%). Single-fibre products account for a smaller share, with 18-28% made of cotton and 11-17% made
2879 of polyester (Refashion, 2023; Bakowska et al., 2025).

2880 9.2.1.3 How to assess physical durability

2881 The assessment of physical durability should evaluate the capability of textile apparel to maintain its properties
2882 over time, resisting to aging factors, such as wear and tear and cleaning cycles. The following methodology was
2883 adopted in this PS because it takes into account the interaction among manufacturing factors and process
2884 technologies (see section 9.2.1.1), the main causes of failures, and the availability of standardised test methods
2885 to assess specific parameters.

2886 The methodology comprises five steps:

- 2887 1. Selection of the key parameters, complying with the principle of economy
- 2888 2. Identification of the characteristics of a new item,
- 2889 3. Simulation of the aging process,
- 2890 4. Assessment of the effects of the aging process,
- 2891 5. Grouping products with homogeneous characteristics.

2892 The selection of the **key parameters** was based on most common failure modes found in the literature and
2893 their corresponding available standardised test methods (**Table 43**).

¹³⁵ LOI n° 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire. Available at [this link](#). Last accessed on 10 October 2024.

2894 **Table 43.** Most common textile apparel failure modes and associated testing parameters

Failure mode group	Type of failure	Occurrence (*) (%)	Associated testing parameters
Fabric related	Pilling	55	Pilling resistance Visual inspection
Colour related	Colour fading	53	Visual inspection
Fabric related	Fabric breakdown	29	Tensile strength Bursting resistance
Fabric related	Accidental damage	29	Determined by the user
Fabric related	Loss of dimensional stability	20	Dimensional stability
Logo failure	Logo failure	16	Visual inspection
Colour related	Discolouration	15	Visual inspection
Fabric related	Hole(s) in seams	14	Tensile strength
Fabric related	Trim failure	8	Visual inspection (without considering the functioning test of buttons and zippers)

2895 (*) Occurrence of failure in the sample analysed by Cooper and Claxton (2022)

2896 *Source: (Cooper and Claxton, 2022c) and AITEX's knowledge*

2897 The identification of the **characteristics of the new item** were fibre-neutral, so that textile apparel made of
 2898 any type of natural fibres, man-made fibres and their blends could meet the thresholds. This approach took
 2899 into account the multiple fibre compositions of products in the scope discussed in section 9.2.1.2. The
 2900 characteristics of the new item were identified based on AITEX's experience in testing textile products.

2901 The **ageing process** of a textile apparel included the effects of numerous factors: the wearing during the actual
 2902 use, the cleaning (washing or dry cleaning), the drying (line-drying or tumble drying), the potential ironing, and
 2903 the storage. For the purpose of the methodology, the simulation of ageing only focussed on the simulation of
 2904 cleaning cycles, because this is the factor that most affects the wear and tear of an item of textile apparel
 2905 (Neuß and Schlich, 2019; Cooper and Claxton, 2022c). In terms of type of cleaning, the literature reports that
 2906 dry cleaning is mostly used for formal wear, whereas the rest of textile apparel is usually cleaned using washing
 2907 machines (Laitala and Klepp, 2020a). Available standardised test methods are capable to simulate the cycles
 2908 of washing and dry cleaning (**Table 69**).

2909 The effect of the ageing process is assessed comparing the performances of an aged product, which underwent
 2910 a defined number of cleaning cycles, with those of a new product. The difference in performances is expressed
 2911 as a percentage reporting the decrease of the key parameters. The better-performing products will present a
 2912 smaller property loss compared to the worse-performing products.

2913 When simulating the aging process, the number of cleaning cycles expresses the objective physical resistance
 2914 of a textile apparel, which should not be confused with its service lifespan that includes the subjective
 2915 judgement of the last owner before disposal. The number of cleaning cycles was mainly based on AITEX's
 2916 experience and validated by their professional network.

2917 The products in the scope are too heterogeneous to be described with the same physical durability parameters
 2918 and performance levels. Therefore, the scope was divided into **categories** containing all products that can be
 2919 described with the same key parameters, same performance levels, and undergo the same number of cleaning
 2920 cycles, because they follow similar manufacturing processes, have similar functions, and count with similar
 2921 main failure modes. In practice, the technology of the fabric (knitted vs woven) implies specific failure modes,
 2922 whereas the function implies a defined aging simulation.

2923 The tests for assessing the key parameters were identified taking into account the function of the product and
 2924 the manufacturing process techniques. This procedure adopted the **principle of economy** based on two
 2925 aspects:

- 2926
- The selection of parameters relevant to the specific product category, and
 - The optimization of the number of tests, using standardised methods addressing more than one parameter.
- 2927
- 2928

2929 For example, the assessment included the performance of the seams when used with woven products and
 2930 excluded them when seams were used in knitted products. This choice was made because the former are weak
 2931 parts of the textile apparel, whereas the latter are technically well integrated into the fabric and do not represent
 2932 a vulnerability of the product. An example about the optimization of the number of tests is given by the

2933 assessment of colour fading, discolouration and logo failure via only the standard on visual inspection instead
2934 of adding specific colour-related tests.

2935 9.2.1.4 Description of product technologies per category

2936 **Table 44** reports the description of eleven product categories from the perspective of the physical durability,
2937 whereas **Table 128** reports a description of all standardised test methods proposed in the framework.

2938

DRAFT - work in progress

Table 44. Product description from the perspective of physical durability

ID	Category description	Key parameter (unit)	Test method	Characteristics of the new product	Simulation of the ageing process
1	Trousers, shorts and skirts, excluding denim	Dimensional change (%)	ISO 3759:2011	±3%	20 washing cycles following ISO 6330 Washing treatment according to label (domestic washing).
		Tensile strength (N)	ISO 13934-1: 2014	Longitudinal: ≥160 N Transversal: ≥120 N	
		Pilling resistance (5-step grading system)	ISO 12945-2: 2020 (2000 cycles)	Grade ≥4	
		Seam resistance (N)	ISO 13935-2:2014	≥100 N	
		Visual inspection for: Colour change Pilling Trimmings aspect Self-staining (5-step grading system)	ISO 15487:2018	Colour change: Grade ≥4 Pilling: Grade ≥4 Trimmings aspect: Grade 5 Self-staining: Grade 5	
2	Denim trousers, shorts and skirts	Dimensional change (%)	ISO 3759:2011	±3%	20 washing cycles following ISO 6330 Washing treatment according to label (domestic washing).
		Tensile strength (N)	ISO 13934-1: 2014	Longitudinal: ≥190 N Transversal: ≥130 N (on seam)	
		Pilling resistance (5-step grading system)	ISO 12945-2: 2020 (2000 cycles)	Grade ≥4	
		Seam resistance (N)	ISO 13935-2:2014	≥120 N	
		Visual inspection for: Pilling Trimmings aspect Self-staining (5-step grading system)	ISO 15487:2018	Pilling: Grade ≥4 Trimmings aspect: Grade 5 Self-staining: Grade 5	
3	Sweaters, mid-layers and knitted dresses	Dimensional change (%)	ISO 3759:2011	±5%	20 washing cycles following ISO 6330 Washing treatment according to label (domestic washing)
		Bursting resistance (kPa)	ISO 13938-2:2019 (50 cm ²)	≥160 kPa	
		Pilling resistance (5-step grading system)	ISO 12945-1:2020 (14 400 cycles)	Grade ≥4	
		Visual inspection for: Colour change Pilling Trimmings aspect Self-staining (5-step grading system)	ISO 15487:2018	Colour change: Grade ≥4 Pilling: Grade ≥4 Trimmings aspect: Grade 5 Self-staining: Grade 5	
		Dimensional change	ISO 3759:2011	±5%	
4	T-shirts and polos	Bursting resistance (kPa)	ISO 13938-2:2019 (50 cm ²)	≥160 kPa	30 washing cycles according to ISO 6330 Washing treatment according to label (domestic washing)
		Pilling resistance (5-step grading system)	ISO 12945-1:2020 (14 400 cycles)	Grade ≥4	

ID	Category description	Key parameter (unit)	Test method	Characteristics of the new product	Simulation of the ageing process
		Visual inspection for: Colour change Pilling Trimmings aspect Self-staining (5-step grading system)	ISO 15487:2018	Colour change: Grade ≥ 4 Pilling: Grade ≥ 4 Trimmings aspect: Grade 5 Self-staining: Grade 5	
5	Shirts	Dimensional change (%)	ISO 3759:2011	$\pm 3\%$	30 washing cycles following ISO 6330 Washing treatment according to label (domestic washing)
		Abrasion resistance (number of cycles)	ISO 12947-2:2016	$\geq 20\ 000$	
		Pilling resistance (5-step grading system)	ISO 12945-2:2020 (2000 cycles)	Grade ≥ 4	
		Seam resistance (N)	ISO 13935-2:2014	$\geq 100\ N$ (on confection seam)	
		Visual inspection for: Colour change Pilling Trimmings aspect Self-staining (5-step grading system)	ISO 15487:2018	Colour change: Grade ≥ 4 Pilling: Grade ≥ 4 Trimmings aspect: Grade 5 Self-staining: Grade 5	
6	Blouses and woven dresses	Dimensional change (%)	ISO 3759:2011	$\pm 3\%$	20 washing cycles following ISO 6330 Washing treatment according to label (domestic washing)
		Abrasion resistance (number of cycles)	ISO 12947-2:2016	$\geq 15\ 000$	
		Pilling resistance (5-step grading system)	ISO 12945-2:2020 (2000 cycles)	Grade ≥ 4	
		Seam resistance (N)	ISO 13935-2:2014	$\geq 80\ N$ (on confection seam)	
		Visual inspection for: Colour change Pilling Trimmings aspect Self-staining (5-step grading system)	ISO 15487:2018	Colour change: Grade ≥ 4 Pilling: Grade ≥ 4 Trimmings aspect: Grade 5 Self-staining: Grade 5	
7	Jackets and coats	Dimensional change (%)	ISO 3759:2011	$\pm 3\%$	3 cleaning cycles: either following ISO 6330 (washing machine) or following ISO 3175-2 (dry cleaning). For domestic washing, treatment according to label.
		Abrasion resistance (number of cycles)	ISO 12947-2:2016	$\geq 20\ 000$	
		Pilling resistance (5-step grading system)	ISO 12945-1:2020 (2000 cycles)	Grade ≥ 4	
		Seam resistance (N)	ISO 13935-2:2014	$\geq 100\ N$ (only for blazers)	
		Visual inspection for: Colour change Pilling Trimmings aspect Self-staining (5-step grading system)	ISO 15487:2018	Colour change: Grade ≥ 4 Pilling: Grade ≥ 4 Trimmings aspect: Grade 5 Self-staining: Grade 5	

ID	Category description	Key parameter (unit)	Test method	Characteristics of the new product	Simulation of the ageing process
8	Hosiery: leggings, stockings, tights and socks	Dimensional change (%)	ISO 3759:2011	±3%	30 washing cycles following ISO 6330 Washing treatment according to label (domestic washing)
		Abrasion resistance (number of cycles)	ISO 13770 method 1	≥20 000	
		Bursting resistance (kPa)	ISO 13938-2: 2019 (7.3 cm ²)	≥220 kPa	
		Visual inspection for: Colour change Pilling Trimmings aspect Self-staining (5-step grading system)	ISO 15487:2018	Colour change: Grade ≥4 Pilling: Grade ≥4 Trimmings aspect: Grade 5 Self-staining: Grade 5	
9	Underwear: underpants and boxers	Dimensional change (%)	ISO 3759:2011	±3%	30 washing cycles following ISO 6330 Washing treatment according to label (domestic washing)
		Visual inspection for: (1) Colour change (2) Pilling (3) Trimmings aspect (4) Self-staining (5-step grading system)	ISO 15487:2018	Colour change: Grade ≥4 Pilling: Grade ≥4 Trimmings aspect: Grade 5 Self-staining: Grade 5	
10	Swimwear	Dimensional change (%)	ISO 3759:2011	±3%	15 washing cycles following ISO 6330 Washing treatment according to label (domestic washing)
		Elasticity of fabric (%)	ISO 20932-3:2018	≤7% after 1 minute (only for feminine items)	
		Colour fastness to artificial light (8-step grading system)	ISO 105-B02:2014	Grade ≥5	
		Colour fastness to sea water (5-step grading system)	ISO 105-E02:2013	Grade ≥4	
		Colour fastness to chlorinated water (5-step grading system)	ISO 105-E03:2010	Grade ≥4	
		Visual inspection for: Colour change Pilling Trimmings aspect Self-staining (5-step grading system)	ISO 15487:2018	Colour change: Grade ≥4 Pilling: Grade ≥4 Trimmings aspect: Grade 5 Self-staining: Grade 5	
11	Accessories	NA	NA	NA	NA

2940 When measuring the characteristics of the new product, the tests addressing dimensional change and visual inspection need to be run after 1 cleaning cycle.

2941 Washing treatments are supposed to follow information reported on the label. Although this information is usually available, it should not be given for granted because it is not mandatory by law.

2942 All products made with denim fabric should not be tested for colour change because this type of fabric is designed to lose colour over time.

2943 NA: Not available, because the category is too heterogeneous.

2944 Source: AITEX's knowledge

2945 Despite the complexity of the products in scope, two test methods were used to assess five **key parameters**
2946 for all product categories: the dimensional change and, via visual inspection, colour change, pilling, appearance
2947 of trims and self-staining. All these parameters have to be assessed after a cleaning cycle.

2948 The breakage of fabric took into account the two manufacturing techniques:

- 2949 — Woven fabrics were described with the tensile strength, seam strength and abrasion resistance;
- 2950 — Knitted fabrics were described via bursting resistance.

2951 Since pilling is the most common failure mode (see **Table 43**), it was assessed via visual inspection in all
2952 categories. Nevertheless, there are specific categories whose function makes these products more prone to
2953 rubbing or friction, and therefore a more specific test was included.

2954 Key parameters like elasticity and colour fastness to artificial light, sea water and chlorinated water were chosen
2955 to describe swimwear, which have a specific function and are exposed to peculiar external agents like salty and
2956 chlorinated water and strong sunlight.

2957 Seam resistance was included in categories with woven textile apparel whose structure and fit design creates
2958 stress during movement on the seams, especially in areas like shoulders, sides and armholes. As previously
2959 mentioned, knitted products are less prone to seam failure due to the specific interaction between fabric and
2960 seams.

2961 The list of key parameters did not include the assessment of trims because:

- 2962 — Problems with trims are the least occurring failure mode (see **Table 43**);
- 2963 — The assessment of trim appearance is included in the visual inspection;
- 2964 — Failures of buttons are the most commonly self-repaired parts of the textile apparel (see Section
2965 6.3.3);
- 2966 — Failure of zippers occurred only 2% of the times (Cooper and Claxton, 2022c).

2967 The potential inclusion of specific test methods for buttons ⁽¹³⁶⁾ and zippers ⁽¹³⁷⁾ would clash with the economy
2968 principle and would not lead to a substantial improvement in the description of the physical durability of these
2969 products.

2970 The values set for the **characteristics of the new products** show that some key parameters decrease their
2971 performances even after one cleaning cycle. This is the case of colour change and pilling analysed via visual
2972 inspection that can score Grade 4 (slight distortion or damage, minimal and only noticeable upon close
2973 inspection), rather than Grade 5 (no visible distortion or damage, fabric maintains its original appearance) after
2974 a single cleaning cycle. Additionally, the dimensional change of the fabric can be between 3 and 5%.

2975 Even without undergoing the first cleaning cycle, the new items do not necessarily score at the top of the scale
2976 of the tests. This is the case of pilling resistance that can score Grade 4 (slight pilling with some pilling visible
2977 but not extensive), rather than Grade 5 (no pilling with no visible pilling on the fabric surface). Additionally, the
2978 assessment of colour fastness ⁽¹³⁸⁾ for new swimwear could show similar performances:

- 2979 • To artificial light: Grade 5 (good light fastness) rather than Grade 8 (outstanding light
2980 fastness);
- 2981 • To sea water and to chlorinated water: Grade 4 (good colour fastness) rather than Grade 5
2982 (excellent colour fastness).

2983 These minimum values assigned to new items underline that new items are sometimes placed on the market
2984 exhibiting relatively poor performances as regards the key parameters that describe physical durability.

2985 The reported number of cleaning cycles is aligned with version 2.0 of the PEFCR A&F (Quantis, 2024) and the
2986 available scientific literature (Easter and Badgett (2019) and studies reported in Section 5.8).

¹³⁶ Button attachment: UNE EN 17394-2:2021 focuses on children's apparel security.

¹³⁷ Zipper attachment and functioning: UNE EN 16732:2016 includes tear tests and zipper fatigue tests.

¹³⁸ The colour fastness tests measure how much the colour of the textile apparel fades and stains.

2987 Textile apparel **accessories** were not described because they are too heterogeneous – they would require a
 2988 further categorization based on their:

- 2989 • Function: (1) gloves and mittens, (2) scarves, shawls, and mufflers, (3) ties and cravats, (4)
 2990 hats and headgear, (5) handkerchiefs and veils, (6) belts and suspenders;
- 2991 • Material composition: at least (1) silk products vs (2) non-silk products;
- 2992 • Fabric technologies: (1) knitted, and (2) crocheted.

2993 This would result in **about 16 potential sub-categories**, whose products undergo none or very few cleaning
 2994 cycles. Consequently, the physical durability should be assessed with specific approaches, which require a
 2995 disproportionate effort compared to the very small market share of these products. The portion of apparent
 2996 consumption of accessories compared to the total textile apparel was rather constant from 2006 to 2022. More
 2997 precisely, the apparent consumption of accessories was about 5% and 4% of the total apparent consumption
 2998 of textile apparel in terms of mass and value, respectively (**Figure 40**). Due to this disproportionate effort
 2999 demand, these products are excluded from the description of the physical durability of textile apparel.

3000 Based on the framework reported in **Table 44, technologies of textile apparel** can be distinguished as
 3001 follows:

- 3002 — **Bad case** (poorly performing products): performance level of at least one key parameter
 3003 decreases more than 50% after aging;
- 3004 — **BC**: performance level of all key parameters decreases between 30% and 50% after aging;
- 3005 — **BAT**: performance level of all key parameters decreases between 20% and 30% after aging;
- 3006 — **BNAT**: performance level of all key parameters decreases less than 20% after aging.

3007 The performance decrease of the key parameters should be calculated as reported in **Table 45** and applies to
 3008 all product categories.

3009 **Table 45.** Guidance for the calculation of performance decrease in the framework of the physical durability

Result of the test method	Key parameter	Decrease of performance level
Numerical	Abrasion resistance (number of cycles) Bursting resistance (kPa) Dimensional change (%) Elasticity (%) Seam resistance (N) Tensile strength (N)	$\frac{\text{Value after aging} - \text{Value of the new item}}{\text{Value of the new item}} * 100 (\%)$
5-step grading system	Colour fastness to chlorinated water Colour fastness to sea water Colour change via visual inspection Pilling resistance Pilling via visual inspection Trimmings aspect via visual inspection Self-staining via visual inspection	Each step represents a change of 20%
8-step grading scale	Colour fastness to artificial light	Each step represents a change of 12.5%

3010 Description of all test methods is reported in Table 128

3011 *Source: own elaboration*

3012 **9.2.2 Maintenance**

3013 Maintenance is the ability of a product to be kept in a condition where it is able to fulfil its intended purpose
 3014 through one or more actions. In the context of textile apparel, it comprises the set of activities that a user carries
 3015 out, fundamentally during the use phase, in order to maintain the product in a condition that satisfies their
 3016 needs. It includes activities such as cleaning, drying, ironing, storing and wearing, in specific environments and
 3017 conditions. It does not include any operations addressing the repair of the product, which is addressed under a
 3018 separate specific product aspect (see section 9.2.3).

3019 Maintenance operations are specific to the item they refer to. In particular, the fibre composition, the fabric
 3020 construction type, the presence of non-fibre-based parts and the finishing treatments of the item are crucial

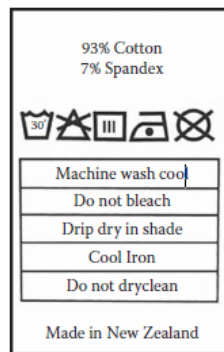
3021 factors determining the suitable maintenance strategies to make the product last longer. This section mainly
3022 focuses on the information that the manufacturer provides to the user to properly maintain textile apparel.

3023 9.2.2.1 The ecosystem affecting maintenance

3024 Process techniques and design choices

3025 Maintenance instructions are commonly communicated through specific symbols on care labels. These symbols
3026 are designed to be universally recognisable providing clear guidance on textile apparel care. However, the
3027 meaning of some of these symbols is not clear to some users, who tend to mistake the suggested care practices.
3028 There are ongoing efforts to standardise and improve the clarity of these symbols by using both symbols and
3029 captions to facilitate the understanding (Yan et al., 2008; Nayak and Ratnapandian, 2018) (Section 10.6.2.7).
3030 Figure 22 shows an example of care label that combines symbols and captions.

3031 **Figure 22.** Example of a care label combining symbols and caption



3032

3033

Source: Nayak and Ratnapandian (2018)

3034 Traditionally, care labels have been physically sewn during the confectioning phase onto textile apparel,
3035 providing essential instructions on washing, drying, and ironing. However, with the rise of digital technology,
3036 many brands now complement the physical labels with online care guides and mobile apps. These digital
3037 platforms offer more detailed explanations and interactive features that help consumers better understand and
3038 follow textile apparel care instructions (Nayak and Ratnapandian, 2018)

3039 **User behaviour**

3040 Consumer behaviour strongly affects textile apparel maintenance, because the choices made by the users may
3041 adhere or not to the best practices reported on the care label. When care information is reported on the item
3042 of textile apparel, users could disregard it, have difficulties interpreting the instructions or they could even
3043 remove the label because it results uncomfortable when wearing the item (see section 6.3.2 and 10.6.2.7). The
3044 removal of physical labels from textile apparel is indirectly promoted by labels displaying a cutting line.

3045 The price of the new item could play an important role when analysing the attention that users pays to care
3046 label information. Users are more likely to follow instructions on the care label if they handle a relative
3047 expensive product, rather than if they handle a relatively cheap one (Wakes et al., 2020b).

3048 Sections 6.3.1 and 10.6.2 report the most relevant best use practices in terms or textile apparel care:

- 3049
- Following information provided in the care label,
- 3050
- Running laundry with sorted items according to their colour, fabric type, and washing temperature,
- 3051
- Using the suitable washing temperature,
- 3052
- Running short washing cycles and reduced spin speed,
- 3053
- Using the right quantity and type of detergents and softeners,
- 3054
- Preferring air-drying out of direct sunlight to tumble drying,
- 3055
- Minimising wash frequency and ironing,
- 3056

- 3057 • Properly folding or hanging to prevent fabric deformation
- 3058 • Storing in cool and dry places.

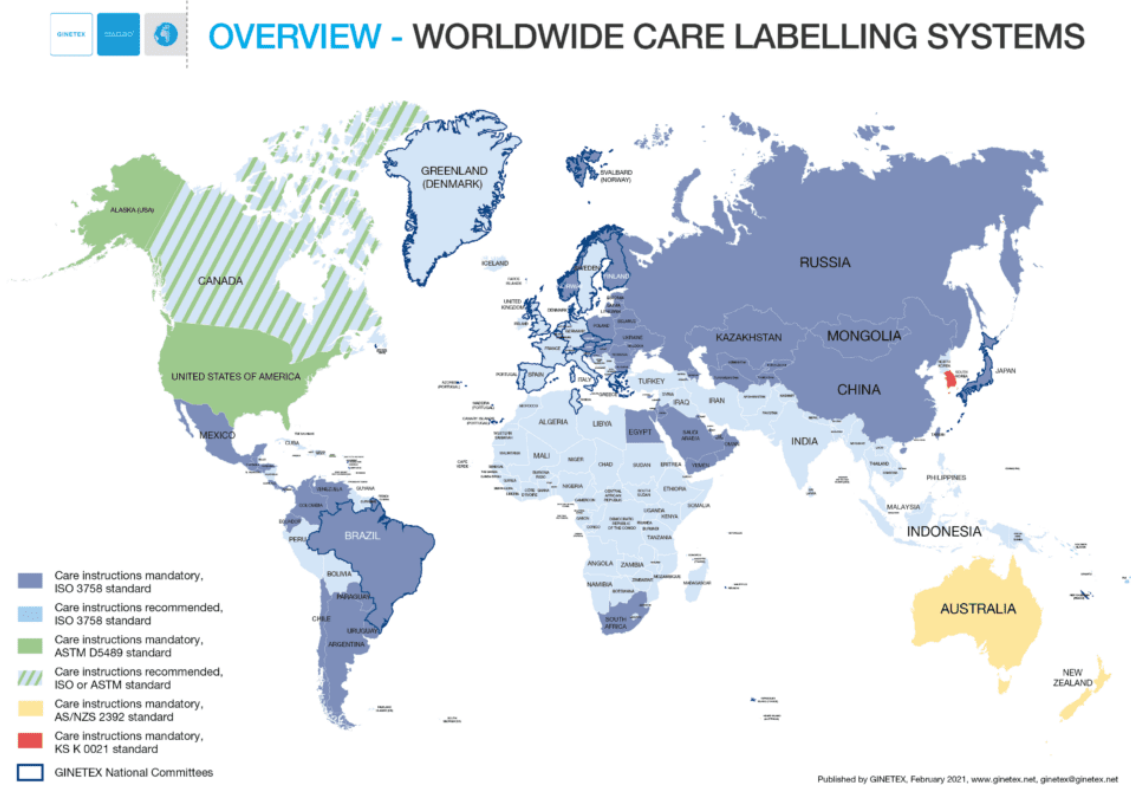
3059 **Legislative framework and industrial best practices**

3060 Care instructions are not currently mandatory under EU law but they are often provided by manufacturers to
 3061 prevent customer complaints. Many countries voluntarily follow the GINETEX Standard ⁽¹³⁹⁾, which establishes
 3062 care labelling system for textiles based on symbols. The European Commission is currently considering the
 3063 introduction of harmonised and partially mandatory textile labelling rules on textile care, in the context of the
 3064 review of the Textile Labelling Regulation (EU) 1007/2001 (TLR) ⁽¹⁴⁰⁾. Nine Member States already require
 3065 mandatory care labels ⁽¹⁴¹⁾ (GINETEX, 2017b).

3066 **Table 129** in section 10.9.4 reports the description of standards used in some regions of the world. They mainly
 3067 differ as regards: (a) temperature units, (b) requirement of captions alongside symbols, (c) adopted symbols,
 3068 and (4) legal requirements (mandatory vs voluntary).

3069 **Figure 23** shows legal requirements and the adoption of standards in specific regions of the world.

3070 **Figure 23.** Care labelling systems in the world



3071
 3072 *Source: UK Fashion and Textile Association. Available at [this link](#). Last accessed 12 November 2024.*
 3073 *Previously published by GINETEX in February 2021*

3074 **Table 46** reports the best practices that manufacturers and retailers try to implement.

¹³⁹ Ginetex website. Available at this link. Last accessed 12 November 2024
¹⁴⁰ Revision of the Textile Labelling Regulation (EU) 1007/2011. Available at this link. Last accessed on 12 November 2024.
¹⁴¹ Austria, Bulgaria, Estonia, Finland, Hungary, Lithuania, Romania, Slovakia and Sweden, as well as, in the EEA, Norway.

3075 **Table 46.** Best practices on care labelling implemented by producers and retailers

Factor	Action
Legibility	Labels should use easily understandable symbols alongside with written instructions. Symbols and letters on labels must remain legible throughout the textile apparel's useful life. The label should use medium-width lettering, where no individual letter should be less than 1.5 mm high.
Parts of the product	If the product is composed of more than one part, the care instruction should take into account the heterogeneity of the product parts.
Comprehensive coverage	Care instruction symbols should apply to the entire textile apparel, including trimmings, zippers, linings, buttons, and sewing thread, unless otherwise specified on separate labels.
Consistent label placement	Labels should be positioned in the same place across all similar items of textile apparel.
Durability of labels	Care labels should be made of materials that are resistant to the care treatments indicated on the label, at least to the same extent as the textile apparel itself.
Material-based instructions	Care instructions should be based on the product's end use and fibre composition. If fabrics contain blended fibres, the care instructions should take into account the most sensitive fibre for the specific treatment.
Pre-sale verification	The care instructions should be verified before being placed on the market to ensure their correctness.

3076 *Source: Own production based on (Nayak and Ratnapandian, 2018)*

3077 **Business models**

3078 As previously mentioned, in general companies are interested to provide care instructions to avoid complaints
 3079 from customers. Nevertheless, this approach could vary according to the business model the company adopts.
 3080 In general, companies that want to promote long-lasting products might pay particular attention when providing
 3081 maintenance instructions. Differently, companies that want to promote a fast turnover in the consumption of
 3082 textile apparel might tend to invest little attention on communicating care instructions.

3083 9.2.2.2 How to assess maintenance

3084 Based on the information gathered in sections 9.2.2.1 and 9.2.2.2, the assessment of maintenance should be
 3085 based on three main aspects:

- 3086 1. Type of information provided, addressing all steps of the use-phase:
 - 3087 (a) cleaning,
 - 3088 (b) drying,
 - 3089 (c) ironing,
 - 3090 (d) storing,
 - 3091 (e) wearing,
 - 3092 (f) additional suggestions;
- 3093 2. Carrier, and
- 3094 3. Communication strategy.

3095 Information about **cleaning** should address all types of cleaning operations the product can/should undergo:
 3096 e.g. dry cleaning by professionals or home washing. In the case of professional cleaning, directions should be
 3097 provided on compatible products for dry cleaning. In the case of home washing, directions should be provided
 3098 on washing temperature, type and dosing of detergents and softeners ⁽¹⁴²⁾, spin speed, type of textile products
 3099 that can be washed with it (e.g. similar colours and fibre types).

3100 Information about **drying** should include directions on the optimal type of drying, with specific information
 3101 regarding drying temperature in the tumble dryer, and sunlight exposure when line drying (air-drying) is used.

3102 Information about **ironing** should include ironing temperature, and best practices about humidity of the item
 3103 to be ironed.

¹⁴² In general, specific chemical formulations can weaken certain fibre types increasing the risk of damage (Cooper and Claxton, 2022c).

3104 Information about **storing** should include directions on how to fold and hang the product, with description of
 3105 the optimal environmental conditions. If relevant, specific information should be provided distinguishing good
 3106 practices about storage after wearing from storage after cleaning operations.

3107 Information about **wearing** should specify the function that the product is designed for: e.g. sport activities,
 3108 leisure time, resistance to humid environment and rain, etc.

3109 Information about **additional suggestions** should include any further information that could support the
 3110 suitable maintenance of the product.

3111 The **carrier** of information can be a physical label where information is directly reported on it and/or digital-
 3112 based, where the information can be reached on an online platform. In this case, it should be very clear and
 3113 simple for the user how to obtain the information.

3114 Finally, regardless of the carrier used, the information should be provided with a **standardised strategy** (or
 3115 structure), so that users can easily navigate information provided by any economic actor.

3116 This framework is suitable to describe all products included in the scope of the PS without any further grouping
 3117 or categorization.

3118 Although user behaviour plays a crucial role in the effects generated by product maintenance, the assessment
 3119 of maintenance in the framework of the ESPR focuses only on the instructions that the manufacturer provides
 3120 to the user. The behaviour of the user will be taken into account in the environmental and economic models to
 3121 be built in the following tasks of the PS.

3122 9.2.2.3 Description of products based on maintenance

3123 **Table 47** reports the description of product technologies in the context of maintenance of textile apparel.

3124 **Table 47.** Description of product technologies in the context of maintenance of textile apparel

Information	BC	BAT	BNAT
Cleaning	Using symbols reported in ISO 3758:2023	It reports symbols reported in ISO 3758:2023 explained with captions	It reports all types of cleaning operation the product can/should undergo: e.g. dry cleaning by professionals or home washing. In the case of professional cleaning, directions should be provided on compatible products for dry cleaning. In the case of home washing, directions should be provided on washing temperature, type and dosing of detergents and softeners, spin speed, type of textile products that can be washed with (e.g. similar colours and fibre types).
Drying	Using symbols reported in ISO 3758:2023	It reports symbols reported in ISO 3758:2023 explained with captions	It reports symbols reported in ISO 3758:2023 explained with captions.
Ironing	Using symbols reported in ISO 3758:2023	It reports symbols reported in ISO 3758:2023 explained with captions.	It reports symbols reported in ISO 3758:2023 explained with captions.
Storing	Not available.	Not available.	It includes directions on how to fold and hang the product, with description of the optimal environmental conditions. If relevant, specific information should be provided distinguishing good practices about storage after wearing from storage after cleaning operations.
Wearing	Not available.	Not available.	It specifies the function that the product is designed for: e.g. sport activities, leisure time, resistance to humid environment and rain, etc.
Additional suggestions	Not available.	Reduction of washing frequency and prefer line drying.	It includes any further information that could support the suitable maintenance of the product.
Carrier	Physical label.	Physical label and a website reported on the label.	Physical label is used for basic most important information or warnings, while other information is reachable with a support of a device (e.g. Radio Frequency Identification (RFID) system) incorporated in the product, so that it does not create discomfort and it is difficult to remove.

Information	BC	BAT	BNAT
Communication strategy	Using symbols reported in ISO 3758:2023.	It reports symbols reported in ISO 3758:2023 explained with captions.	Users can easily navigate information provided by any economic actor because it is provided following a standardised format.

3125 Physical labels are usually made of polyester and satin due to their softness and resistance properties (Nayak and Padhye, 2015).
3126 Care symbols use ISO 3758:2023 ⁽¹⁴³⁾.

3127 *Source: own production*

3128 9.2.3 Repairability

3129 According to the ESPR, the repairability is defined as the ability of a defective product or waste to return to a
3130 condition where it fulfils its intended use (**Table 2**). In the context of textile apparel, this return to the intended
3131 use includes the acceptance by the user, who should still be satisfied with the potential new aesthetics of the
3132 product after repair operations. This could be the case for example in the use of patches, mending operations
3133 on fabrics, or the use of buttons different from the original ones.

3134 9.2.3.1 The ecosystem affecting the repairability

3135 Design principles for repairable items - choices and process techniques

3136 Textile apparel is often composed by many pieces of fabrics and by non-textile parts such as buttons, zippers
3137 and many more. Fabrics could be organised on one or more layers, which could have the same or different fibre
3138 composition and properties. Additionally, specific parts of textile apparel could have exclusively an aesthetic
3139 function and be made of numerous materials such as leather, plastics, metal and fibre-based. All these parts
3140 composing textile apparel are mostly joined with seams, but other ways such as heat-bonding and laser-based
3141 techniques are also in use. Furthermore, an item of textile apparel can also be seamless and be made of only
3142 one piece of fabric.

3143 The products included in the scope of the PS are very heterogeneous in terms of number, properties and
3144 functions of their parts. This heterogeneity goes beyond the intended function of the product, because the same
3145 product could be made in numerous ways. For example, a t-shirt can be made of a knitted fabric with no seams,
3146 or it can be made by numerous panels of fabric joined with seams, buttons and sequins, resulting in a product
3147 made of numerous parts, each of them with a specific function.

3148 **Table 43** in section 9.2.1.3 reports that the fabric is the part which is most affected by failures, followed by
3149 seams and trims. Fabric is usually damaged by colour fading, discoloration, breakdown, fraying and thinning,
3150 pilling and stains.

3151 From the general design perspective, modularity, use of standardised parts and availability of spare parts are
3152 believed to be important for product repairability (Cordella, Sanfeliu, et al., 2019). **Modular products** are easily
3153 disassembled without damaging the product, so that the damaged part can be repaired. In the context of textile
3154 apparel, modularity leads to trade-offs with comfort, because seams or components joining different parts of
3155 the textile apparel create a discontinuity in the fabric in contact with the skin which is usually perceived in terms
3156 of discomfort. Additionally, modularity leads to a trade-off with the physical durability because seams are weak
3157 parts of textile apparel.

3158 The **use of standard parts** in the textile industry is rather limited mainly due to its intrinsically creative nature.
3159 The European Environment Agency identified fasteners as the main textile apparel part that could be subjected
3160 to standardization without affecting the creative nature of this industry (EEA et al., 2022). The size, material
3161 and attachment method of zippers, buttons, snaps, and other fasteners could be standardised as well as the
3162 thickness of the yarns. However, it is difficult to envisage standardization involving the fabric, which is the main
3163 part of textile apparel and which is also the part that is most prone to being damaged (**Table 43** in section
3164 9.2.1.3). The standardization of fabric would potentially limit the creative nature of the textile apparel industry.

3165 The **availability of spare parts** in the textile apparel industry should take into account the high number of
3166 different collections placed on the market and the real use of these spare parts. Section 5.6 indicated that
3167 retailers place on the market up to one collection per week. Making available spare parts for all these different

¹⁴³ ISO 3758:2023 Textiles — Care labelling code using symbols. Available at [this link](#). Last accessed on 13 November 2024.

3168 items would imply the manufacture of product parts that most probably would never be used due to the fast
3169 changing preferences and attitudes of the users. Additionally, the use of spare pieces of fabric is strictly
3170 connected to the fashion trends and user acceptance to wear a product composed by pieces of fabric in a
3171 different status (new and worn), which would resemble patches.

3172 **Business models**

3173 The European Environment Agency estimated that companies working in the textile repair sector decreased in
3174 the last decade, reporting that they are small in size and have a turnover equal to about 0.25% of the apparel
3175 textile sales in Europe (EEA et al., 2022). A more detailed analysis of the apparel repair sector is hindered by
3176 the way in which collection of this data is performed by Eurostat, which aggregates under the NACE code 95.29
3177 repair of many personal and household goods, including bicycles, books, musical instruments, apparel, etc...⁽¹⁴⁴⁾.

3178 In recent years, some fashion brands have started offering repair services to their customers and/or manuals
3179 and directions to address some simple repairs of their products, such as replacing a zipper or sewing a button.

3180 **Fashion trends** depend on many players such as stylists, influencers and fashion brands. They could potentially
3181 promote repaired products with for example visible mending and patches, but in reality, such products are not
3182 socially accepted in the majority of social gatherings, such as workplaces, parties, etc (Choi et al., 2022; Hong
3183 et al., 2024).

3184 **User behaviour and economic aspects**

3185 The decision of repairing an item of textile apparel is highly subjective and depends on individual values, fashion
3186 trends, price, skills and time available to users.

3187 The **emotional attachment** to the product largely influences the decision to repair an item or to replace it
3188 with a new one. Textile apparel is more likely to be repaired when it evokes meaningful memories, it is an
3189 expression of user identity or provides particular comfort (Page, 2014; Gwilt, 2021; Damhorst, 2019).

3190 The **price of repair** compared to the price of the new item plays a crucial role when the user decides to repair
3191 or replace an item of textile apparel. Expensive items tend to be repaired more often than cheap ones due to
3192 the cost-effectiveness of the choice (Gwilt, 2021). In particular, if the price of repair exceeds about 40% of the
3193 price of the new item, users tend to replace the product rather than repairing it (Cordella, Sanfelix, et al., 2019;
3194 Ribeiro et al., 2023). A simple exercise reported in section 10.9.5 shows that in the EU, professional repair
3195 operations can be much more expensive than the purchase of a new item. In this context, the user prefers to
3196 buy a new item rather than repairing the damaged one.

3197 When a user decides to repair an item, self-repair is the most common practice followed by unpaid repair via
3198 associations such as repair cafes⁽¹⁴⁵⁾ and lastly via paid support using professional repairer. Besides economic
3199 reasons reported above, it seems that this ranking among different options is largely affected by user mistrust
3200 of the capabilities of professional repairers and the cost in terms of time that is associated to repairing
3201 operations including logistics (Laitala et al., 2021b; EEA et al., 2022; McQueen et al., 2023).

3202 However, self-repair is a viable option only if the user has suitable skills and available time. Usually, users do
3203 not have the right skills for self-repair. Although in general women are more likely to repair their defective
3204 apparel than men, younger generations, regardless of gender, tend to lack knowledge about the necessary tools,
3205 materials and practices (EEA et al., 2022; McQueen et al., 2023; Hernandez et al., 2024). Disregarding user skills,
3206 the value given to the time spent in self-repair plays a crucial role when a user decides what to do with their
3207 damaged item (Jain, 2021).

3208 **Legislative framework and best practices**

3209 Currently, there is no legal framework for repair of textile apparel in EU. The promotion of reparability is left to
3210 individual fashion brands' voluntary initiatives. However, on 30 July 2024, Directive 2024/1799 on repair of
3211 goods⁽¹⁴⁶⁾ entered into force, with the aim of promoting repair of goods both within and outside the legal

¹⁴⁴ Eurostat: NACE Rev. 2 – Statistical classification of economic activities in the European Community, available at [this link](#). Last accessed 10 October 2024.

¹⁴⁵ Repair cafes are local no-profit workshops where volunteers repair or help repairing numerous goods, including textile apparel. Available at [this link](#). Last accessed on 11 November 2024.

¹⁴⁶ Directive (EU) 2024/1799 of the European Parliament and of the Council of 13 June 2024 on common rules promoting the repair of goods and amending Regulation (EU) 2017/2394 and Directives (EU) 2019/771 and (EU) 2020/1828 (Text with EEA relevance). Available at [this link](#).

3212 guarantee. Member States have to transpose the Directive into national legislation and apply it from 31 July
3213 2026.

3214 Under Directive 2024/1799, manufacturers of products that are subject to reparability requirements under EU
3215 law will have to repair those products within a reasonable time and for a reasonable price. For such an obligation
3216 to apply, reparability requirements would have to be set in product-specific legislation, potentially for instance
3217 in the future Delegated Act on textile products under the ESPR.

3218 Furthermore, manufacturers are required to make information available about their repair services to
3219 consumers in an easily accessible manner and consumers will be able to find repairers more easily through a
3220 new online European Repair Platform.

3221 Directive 2024/1799 has also amended the existing Sale of goods Directive (EU) 2019/771 (¹⁴⁷), adding an
3222 additional year to the legal guarantee if the choice is made to repair a product instead of replacing it under the
3223 legal guarantee.

3224 9.2.3.2 How to assess reparability

3225 Section 9.2.3.1 reported how emotional attachment, fashion trends and repair price strongly affect the success
3226 of reparability for textile apparel. In addition to these aspects, reparability can be assessed via more product-
3227 related properties identifying the product parts and describing the level of four key parameters: (1) disassembly
3228 complexity, (2) tool accessibility, (3) use of standard fasteners, and (4) repair support resources. **Table 48**
3229 provides a description of textile apparel in the context of reparability without taking into account potential
3230 trade-offs between reparability and physical durability. These trade-offs will be assessed in Task 5 and 6 of
3231 the PS.

¹⁴⁷ Directive (EU) 2019/771 of the European Parliament and of the Council of 20 May 2019 on certain aspects concerning contracts for the sale of goods. Available at [this link](#).

3232 **Table 48.** Repairability assessment via four key factors

Key parameters	Relatively easy reparability	Relatively difficult reparability
<p>Disassembly complexity</p> <p>It evaluates how easily parts of textile apparel can be separated without damaging the product.</p>	<p>Product parts can be easily separated without damaging the product.</p> <p>This is especially the case when the product is made of only one part.</p> <p>Type of connectors: Temporary seams: Double-stitched or easily accessible seams that can be opened with minimal damage (e.g., simple lockstitch or chainstitch). Fabric Layers: Single-layer designs or modular textile apparel (e.g., detachable lining) are easier to access for repair. Access Points: Visible and accessible access points: Clear, deliberate access points for modifying or replacing specific parts make disassembly easier.</p>	<p>Product parts are difficult to separate without damaging the product</p> <p>Type of connectors: Permanent seams: These are difficult to open without damaging the fabric (e.g., overlocking or serged seams). If the seams must be cut or torn, this lowers the reparability level. Use of adhesives or heat-sealing require specialised tools. Fabric Layers: Layered textile apparel: Items with multiple bonded or fused fabric layers are harder to disassemble without damaging the underlying structure. Access Points: Concealed or no access points: Products without clear areas to begin disassembly or where components are sealed shut.</p>
<p>Tool accessibility</p> <p>It evaluates whether common household tools can be used to repair the product or if specialised tools are needed. This is strictly connected to the type of product failure.</p>	<p>Common household tools are sufficient for repairs.</p> <p>Type of Tools Required: Scissors, needles and thread. Availability of Tools: Commonly found in physical or online stores.</p>	<p>Specialised tools are required to disassemble and repair the product.</p> <p>Type of Tools Required: Industrial or professional tools like sewing machines and similar tools. Availability of Tools: Usually expensive tools available only in professional distribution.</p>
<p>Standard fasteners</p> <p>It evaluates if standard fasteners are used.</p>	<p>Easy to source compatible parts and materials.</p> <p>Use and availability of standardised fasteners: It uses standard fasteners that are easily available in physical and online shops.</p>	<p>Difficult to source compatible parts or materials.</p> <p>Use and availability of standardised fasteners: Unique/proprietary fastener, which are difficult to source.</p>
<p>Repair support resources</p> <p>It evaluates the availability of repair instructions and services.</p>	<p>Availability of repair support.</p> <p>Repair instructions: It includes detailed repair documentation that supports the repair process and it is easily accessible. The guide provides specific instructions tailored to the product via guides, photos, or videos. Repair services offered: Accessible in the region where the product is sold.</p>	<p>Absent or very general repair support.</p> <p>Repair instructions: It lacks of specific repair information. Repair services offered: Not accessible or not available in the region where the product is sold.</p>

Source: own production.

3233

3234

3235 9.2.3.3 Description of products based on reparability characteristics

3236 Following the framework reported in section 9.2.3.2, **Table 49** reports a description of product technologies in
 3237 the context of reparability. However, the necessary condition for a repairable product is that the price of the
 3238 repair should be acceptable to the user when compared to the price of a similar new item.

3239 **Table 49.** Description of product technologies from the reparability perspective

Key parameter	Base Case (BC)	Best Available Technology (BAT)	Best Not yet Available Technology (BNAT)
Disassembly complexity	When products are made of more than one part, their disassembly is highly complex, requiring multiple steps to access damaged parts. The products use standard fasteners, but they are usually hard to access or remove.	When products are made of more than one part, their disassembly has low complexity, with easily accessible parts. The products use standard fasteners, designed for simple removal.	When products are made of more than one part, their disassembly can be performed without tools. The products use fasteners that can be detached and reattached multiple times without damage.
Tools accessibility	The repair operations require basic and specialised tools.	The repair operations require only basic tools.	The repair operations require no tools.
Standard fasteners	Compatible fasteners are available.	Compatible standard fasteners are available.	Compatible standard fasteners are available with personal customization via 3D printers.
Repair support resources	Repair support is very limited, with vague instructions and service limited to portions of the region where the product is sold.	The product has detailed, repair guidance about the failure of most common damaged product parts. Repair services are available in the whole region where the product is sold.	Interactive repair support is available real-time via augmented reality, artificial intelligence or other technologies. Repair services are available in the whole region where the product is sold.

3240 *Source: JRC own production.*

3241 **9.2.4 Waste generation**

3242 In this PS, the following definitions were used:

- 3243 — Textile waste is a textile product which the holder discards or intends or is required to discard ⁽¹⁴⁸⁾.
- 3244 — Post-industrial textile waste is textile waste generated during the manufacturing of textile
 3245 products and their precursors (manufacturing of fibre, yarn and fabric, and during confectioning)
 3246 (Huygens et al., 2023).
- 3247 — Pre-consumer textile waste is textile waste generated as a result of discarding unsold textile
 3248 products.
- 3249 — Post-consumer textile waste is a textile product that have been discarded after consumption and
 3250 use by the citizen or end-users of commercial and industrial activities (hotel, care, automotive,
 3251 etc.). For this reason it is commonly referred to as household and commercial post-consumer
 3252 textile waste, respectively (Huygens et al., 2023).

3253 Pre-consumer textile waste is generated at manufacturer and retailer stages and it includes the following
 3254 unsold products:

- 3255 • Finished products that the manufacturers do not send to their customers due to order change
 3256 or cancellation;
- 3257 • Products that were placed on the market but were not purchased by consumers;

¹⁴⁸ The definition of textile waste is inspired by the definition of waste reported by the Waste Framework Directive (WFD). Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (Text with EEA relevance). Available at [this link](#).

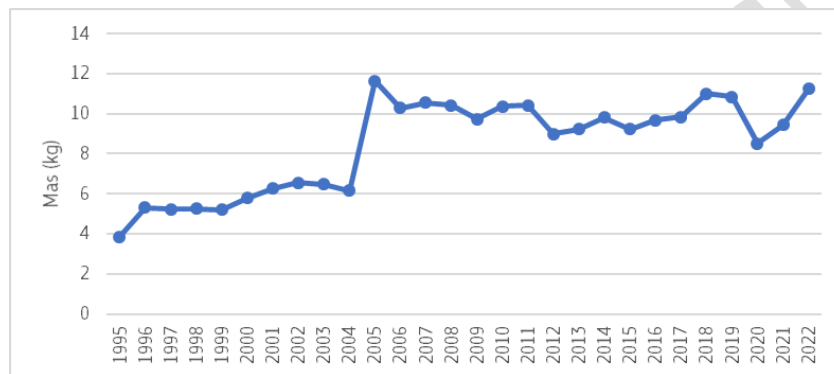
- 3258 • Products returned to the retailer after being purchased;
- 3259 • Products that the retailer decides not to place on the market.

3260 This last type of pre-consumer textile waste includes obsolete products belonging to collections that the retailer
 3261 considers not suitable for the fast changing market, and products that do not meet the retailer' standards,
 3262 whose remanufacturing is not economically viable (Roberts et al., 2023).

3263 9.2.4.1 Textile waste in numbers

3264 The consumption of textile apparel drives the generation of its waste. **Figure 24** shows that the yearly apparent
 3265 consumption of an EU-27 citizen increased from about 6 kg before 2005 up to about 10 kg between 2005 and
 3266 2022. In particular, in 2019 the EU generated about 6 Mt of textile apparel waste (**Table 50**). A substantial
 3267 degree of uncertainty exists on these values because Member States and companies have different definitions
 3268 of textile waste and standards for reporting waste generation, and reporting standards to official databases
 3269 (e.g. Eurostat) (Huygens et al., 2023).

3270 **Figure 24.** Apparent consumption of textile apparel per capita in EU-27



3271 Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

3272 **Table 50.** Amount of textile apparel waste generated due to EU consumption in 2019

Type of waste	Mass (Mt/y)	Contribution to the total (%)
Post-consumer	5.2	87
Pre-consumer	0.16	3
Post-industrial	0.64	11
Total	6	100

3273 Source: Huygens et al. (2023)

3274 Post-industrial waste ranges from 25% to 45% of all fabric used in the production (Aus et al., 2021). The
 3275 quantity of pre-consumer waste is currently considered underestimated mainly due to lack of transparent
 3276 reporting (Aus et al., 2021; Duhoux et al., 2024).

3277 In terms of fate of textile waste, it is estimated that about 10% of post-industrial and pre-consumer textile
 3278 waste is recycled, while the rest is incinerated, landfilled or exported to third countries with unknown final
 3279 destiny. Only about 5% of the post-consumer textile waste is recycled in the EU, about 17% is exported to third
 3280 countries and the rest is either incinerated or landfilled (Huygens et al., 2023).

3281 Besides textile waste, the textile industry generates waste from packaging, hangers, which are usually made of
 3282 plastics, and spent chemicals used in the manufacturing stage. Wastewater is also generated, but it is not
 3283 included in this analysis because it is addressed in section 9.2.6 on environmental impacts as emissions into
 3284 water (Roth et al., 2023).

3285 9.2.4.2 Analysis of the ecosystem

3286 Although the types of textile waste have some peculiarities, their generation has some common drivers when
 3287 focussing on business models and user behaviours.

3288 On one hand, the dominant **business models** of many fashion designers, fashion brands and retailers
 3289 incentivise the continuous consumption of new products:

3291 — placing on the market up to 47 new collections per year (see Section 5.6),

3292 — offering multiple seasonal discounts over the year to incentivise the consumption of products that
3293 are considered obsolete, and

3294 — generating a sense of urgency and exclusivity by placing on the market numerous limited editions
3295 and using the dark pattern in online sales (see Section 6).

3296 In particular, the brand-led operation model promotes new trends via numerous Fashion Weeks and trade shows
3297 all around the world, as well as by advertising the proposals of fashion editors, stylists, celebrities and
3298 influencers. Additionally, companies using the consumer-led operation model aim to predict the demand of
3299 users via trend forecasting agencies or in-house forecasting models, which lead to overproduction to meet the
3300 fast changing requests of as many people as possible in different parts of the world (Roberts et al., 2023;
3301 McKinsey & Company, 2024; Brondino, 2022).

3302 On the other hand, **users** choose products based on (1) what is available on the market, (2) what is economically
3303 convenient, and (3) what makes them feel good and accepted by others. Therefore, the change of user demand
3304 depends on the new trends, and the needs of individuals to self-represent and feel accepted when meeting
3305 others at work, in their free time and in special occasions (see Section 6).

3306 The following three subsections deepen into aspects of the ecosystem that are specific to each type of textile
3307 waste.

3308 9.2.4.2.1 Post-industrial waste

3309 When focussing on the manufacturing stages, business models and process techniques largely affect the
3310 generation of post-industrial textile waste.

3311 As described in section 5.6, the **business model** of European and North American fashion companies rely on
3312 the manufacture of companies located in third countries, which operate as:

3313 — Primary suppliers: main suppliers that provide the products directly to the fashion company.

3314 — Sub-contractors: secondary suppliers that primary suppliers might use to fulfil part of their job.

3315 — Licensed suppliers: companies producing goods under a licensing agreement, which allow them to
3316 use in third countries the patents and trademarks of the fashion companies.

3317 Within this structure, suppliers are asked to rapidly produce and adapt to the volatile requests of the market,
3318 which could lead to changes or even cancellation of orders. Lead time from the concept of the textile apparel
3319 to the potential customer purchase could be as short as 15-21 days. This business model challenges a careful
3320 design, resource planning, and quality control during the manufacturing processes. As consequence, post-
3321 industrial textile waste increases because (Aus et al., 2021; Zhao and Kim, 2021; Fernandez-Stark et al., 2022;
3322 Duhoux et al., 2024; McKinsey & Company, 2024):

3323 • The supply chain is characterised by the bullwhip effect ⁽¹⁴⁹⁾, where suppliers enlarge their
3324 inventories to tackle demand fluctuations;

3325 • Suppliers waste part of their inventories when stock location storage becomes limited;

3326 • Suppliers overproduce to benefit from economies of scale;

3327 • Material belonging to cancelled orders is directly wasted rather than remanufactured;

3328 • Lack of manufacturing quality control leads to low-performing products rejected by fashion
3329 brands.

3330 **Process techniques** adopted in the manufacture of textile apparel are crucial elements conditioning the
3331 generation of post-industrial textile waste. In particular, key factors include poor planning, inefficient

¹⁴⁹ The bullwhip effect refers to the phenomenon where order variability increases as the orders move upstream in the supply chain. The bullwhip effect is sometimes referred to as 'demand amplification', 'variance amplification' or the 'Forrester effect'. This effect becomes significant when the cost from fluctuations in production/ordering outweighs the cost of holding inventory (Wang and Disney, 2016).

3332 manufacturing systems and cutting methods, as well as suboptimal fabric utilisation (Aus et al., 2021; Khairul
3333 Akter et al., 2022).

3334 At the confectioning stage, cutting operations are the largest contributors of this type of waste, followed by
3335 mistakes during sewing and damages to fabrics (Aus et al., 2021; El Shishtawy et al., 2022; Vilumsone-Nemes
3336 et al., 2023). On one hand, design software like CAD (Computer-Aided Design) and the use of artificial
3337 intelligence can optimise the use of fabric and decrease the generation of post-industrial waste by 27% when
3338 compared to manual cutting (Krsteva and Demboski, 2011; Palacios-Mateo et al., 2021). On the other hand,
3339 sewing operations are semi-manual activities affected by the performance of the machinery and the pressure
3340 put on the operators to meet the tight deadlines of rapid production (Aus et al., 2021).

3341 In general, the manufacturing process could be optimised adopting methodologies such as Lean Manufacturing,
3342 Total Quality Management, Kaizen, Just-In-Time (JIT) and Lean Six Sigma. The adoption of these methodologies
3343 optimise processes, improves the alignment of demand and production and reduces the incidence of defective
3344 goods (Saleeshya et al., 2012; Harpa et al., 2024).

3345 However, despite technological developments, there is lack of standardised industrial best practices that enable
3346 the reduction of post-industrial textile waste. The authors are not aware of any specific **legislation** in producing
3347 countries specifically addressing this type of textile waste.

3348 9.2.4.2.2 Pre-consumer waste

3349 When focussing on the retailer stage, all elements of the waste generation ecosystem play an important role.

3350 **Process techniques** related to the efficiency of the reverse logistic could decrease the number of destroyed
3351 returned products avoiding that more items get lost, damaged or with time become obsolete. The literature
3352 reports different improvement potential when adopting the Best Management Practices: pre-consumer waste
3353 due to returns could be decreased from 44% to 22% or from 25% to 13%. Moreover, detailed product
3354 descriptions, especially on size and fitting, could support informed purchase and therefore reduce the number
3355 of returns (Ahlström et al., 2020; Duhoux et al., 2024; Roichman et al., 2024).

3356 The **business model** concerning return policies of the retailer and the marketplace plays a relevant role. To
3357 overcome reverse logistic issues, some fashion brands offer an integrated shopping experience that combines
3358 e-commerce and physical stores. In this case, customers can purchase online and potentially return in physical
3359 stores where they can get customised recommendations (McKinsey & Company, 2024).

3360 The bullwhip effect characterising the manufacturing processes affects invest also retailers, who try to enlarge
3361 their inventories to meet the requests of the changing market (Fernandez-Stark et al., 2022; Duhoux et al.,
3362 2024; McKinsey & Company, 2024). As a consequence, as soon as fashion trends change, new collections
3363 generate obsolete goods that remain unsold. Therefore, items less affected by changing trends and with high
3364 demand are less likely to remain unsold (Duhoux et al., 2024).

3365 Section 6.4.4 reported that **users** are not aware of the consequences of returning items of textile apparel after
3366 their online purchase – most of them think that the items are always re-sold. The investigation showed that
3367 customers find convenient purchasing online when returns are free of charge. In these cases, customers have
3368 the opportunity to try and touch the product directly at home without going to the physical store. This
3369 opportunity sometimes evolves to the extreme behaviours of bracketing and 'wardrobing'. The former describes
3370 users purchasing multiple sizes of the same item and returning those that do not fit. The latter describes
3371 consumers purchasing expensive items, wearing them, and then returning them (see Section 10.6.3).

3372 From a **legislative perspective**, the destruction of pre-consumer textile waste is often preferred by companies
3373 because there are taxation advantages related to VAT payment (Duhoux et al., 2024). With the entrance into
3374 force of the ESPR, from 19 July 2026, the destruction of unsold textile products is prohibited unless derogations
3375 apply in cases where destruction is necessary, for instance due to health and safety reasons. Only micro and
3376 small enterprises will be exempted from this prohibition. However, the ESPR addresses only the unsold products
3377 that are placed on the EU market, while it does not address pre-consumer textile waste generated at
3378 manufacturing stage.

3379 9.2.4.2.3 Post-consumer waste

3380 When focussing on the end-of-life of textile apparel, the analysis of reasons for textile apparel disposal sheds
3381 light on what mostly affects the generation of post-consumer waste. The investigation reported in Section 6.2.1
3382 highlighted three main reasons:

- 3383 1. The loss over time of product intrinsic performance,
3384 2. The change in perceived value, and
3385 3. The change over time of the body shape of the user resulting in unfitted textile apparel.

3386 The first reason is strictly connected to the physical durability of the product over aging processes. The second
3387 reason is related to the desire or need to change the textile apparel due to changing fashion trends, personal
3388 tastes, or social life. The third reason is connected to physiological change of the human body over time.

3389 In addition to these three factors, a study revealed that users are more prone to dispose of cheaper products
3390 than of higher-priced items because they usually develop higher emotional attachment to the latter than to the
3391 former (Forbrugerrådet Tænk, 2022).

3392 From the **legislative perspective**, the Waste Framework Directive (2008/98/EC) and the recently published
3393 revision of the Waste Shipment Regulation (2024/1157) (WSR)⁽¹⁵⁰⁾ regulate the management of post-
3394 consumer waste in EU and its potential shipment within the EU and from the EU to third countries, respectively.
3395 In particular, the proposal to establish Extended Producer Responsibility (EPR) schemes for textiles in all EU
3396 Member States should ensure that producers will cover the costs of textile waste management and research
3397 and development on e.g. recycling technologies (see Section 4.1.2). Additionally, the WSR allows the shipment
3398 of textile waste produced in EU only to non-OECD countries that have expressed their willingness to receive the
3399 waste and demonstrate the ability to treat it in an environmentally sound manner⁽¹⁵¹⁾.

3400 9.2.4.3 How to assess and describe product technologies in the context of waste generation

3401 The generation of waste is not an intrinsic property of a single product technology, but rather depends on many
3402 elements of its ecosystem, and is driven by the total consumption of textile apparel. Currently, it is not possible
3403 to understand if a product was manufactured using specific process techniques and under particular business
3404 models. Moreover, it is unknown how many companies use advanced technologies to minimise their post-
3405 industrial and pre-consumer waste. Nevertheless, the study of the literature and the consultation with
3406 stakeholders reveals that the majority of the products consumed in EU are produced with the business models
3407 incentivising overconsumption and overproduction as described in section 9.2.4.2.

3408 To sum up, it is difficult to distinguish BC, BAT and BNAT among the product technologies placed on the market.
3409 In the following steps of the preparatory study, the description of waste generation will be modelled taking into
3410 account the variability and uncertainties of all factors playing a role: the influence of the dominant business
3411 models, user behaviours and the general performances of available process techniques.

3412 9.2.5 Recyclability and recycled content

3413 This section analyses the recyclability and recycled content of textile apparel starting from their definitions
3414 reported in section 9.1:

3415 — **Recyclability** is the ability of products after becoming waste to be reprocessed into products,
3416 materials or substances whether for the original or other purposes. It includes the reprocessing of
3417 organic material but does not include energy recovery and the reprocessing into materials that are
3418 to be used as fuels or for backfilling operations.

3419 — According to the ISO 14021, the **recycled content** is the proportion, by mass, of recycled material,
3420 from pre- and post-consumer waste, in a product or packaging.

3421 These definitions will be revised in the end of this section based on the analysis of this specific product aspect.

¹⁵⁰ Regulation (EU) 2024/1157 of the European Parliament and of the Council of 11 April 2024 on shipments of waste, amending Regulations (EU) No 1257/2013 and (EU) 2020/1056 and repealing Regulation (EC) No 1013/2006. Available at [this link](#).

¹⁵¹ Decision of the Council on the Control of Transboundary Movements of Wastes Destined for Recovery Operations. Available at [this link](#). Last accessed on 18 October 2024.

The Waste Shipment Regulation (2024/1157) prohibits the exports of textile waste (Basel Convention entry B3030) destined for recovery in countries to which the OECD Decision does not apply. Specific countries can be included via a Delegated Act (see Article 41).

3422 9.2.5.1 The ecosystem of recyclability and recycled content

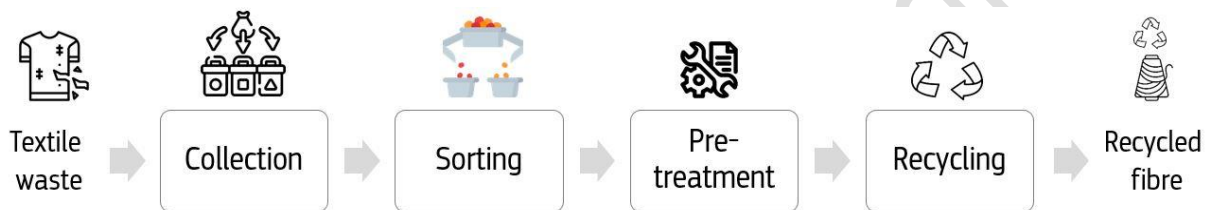
3423 **Process techniques and design choices**

3424 **Figure 25** shows the description of the recycling system of textile waste aiming to produce recycled fibres.

3425 In the first place, textile waste is collected separately from other waste fractions and is subsequently sorted
3426 following criteria that depend on the techniques used in the following stages of the recycling system. Then the
3427 waste is treated to prepare the material for the following process and finally it undergoes the actual recycling
3428 process that results in a recycled fibres output. The recycling process includes recycling techniques and potential
3429 further treatments to obtain the recycled fibre ⁽¹⁵²⁾. **Figure 25** does not include the transportation of the waste
3430 potentially occurring between different processes because it is not relevant to the analysis performed.

3431 In this section, only the waste undergoing recycling will be described but the reader should keep in mind that
3432 the waste management of textile waste includes all processed described in Section 10.2.8.

3433 **Figure 25.** Recycling system of textile waste



3434

3435

Source: own elaboration using icons from www.flaticon.com

3436 The separate **collection** of textile waste guarantees that this waste fraction can enter the recycling system.

3437 Since post-industrial textile waste is managed by manufacturers, the waste is already separated from other
3438 waste fractions and it is directly delivered to other actors of the value chain. When the waste is generated at
3439 fibre stage, the spinnable part is usually reintegrated in the manufacturing process, whereas the non-spinnable
3440 part is usually given to other actors of the value chain for further applications, such as nonwovens filters,
3441 insulation, and filling (Boschmeier et al., 2024). When the waste is generated during spinning, broken ends of
3442 slivers and laps are usually reintegrated in the manufacturing process, whereas waste from blow-room
3443 machines and carding is usually given to other actors of the value chain for further treatments or applications
3444 (Bedež Ute et al., 2019). Differently, when the waste is generated during the manufacturing of fabric or
3445 confectioning, manufacturers may send the waste to specialised companies for further treatments or disposal.

3446 Similarly to the post-industrial textile waste, the pre-consumer textile waste is managed by manufacturers and
3447 retailers. Also in this case, the waste is already separated from other waste fractions and it is directly delivered
3448 to other actors of the value chain.

3449 The separate collection of post-consumer textile waste includes pick-up and drop-off schemes. Pick-up schemes
3450 involve scheduled collection routes targeting specific waste types, such as bulky or frequently disposed waste.
3451 In pick-up schemes, consumers are usually provided with containers, especially in door-to-door or kerbside
3452 collection. Alternatively, drop-off schemes require individuals to deliver their waste either to designated
3453 containers or through take-back systems offered by retailers. In Europe, post-consumer textiles waste are
3454 mainly collected via drop-off containers (Huygens et al., 2023).

3455 In the recycling system, **sorting** is relevant mainly for post-consumer waste. Post-industrial waste and pre-
3456 consumer waste do not need to be sorted because at the generation site, manufacturers and retailers, the
3457 waste is already segregated according to similar characteristics, such as cut-offs of the same fabric, or the
3458 unsold items belonging to the same collection. However, returned items could be an exception – according to
3459 the retailer logistics, this waste could need to be sorted.

¹⁵² This happens because the output of recycling techniques can be an intermediate product that needs to be further treated before becoming a recycled fibre. **Table 51** provides more details.

3460 At sorting facilities, items are sorted according to their reusability, composition and colour. The sorting criteria
3461 are set by second-hand traders and recyclers looking for items with specific characteristics. There are mainly
3462 three types of sorting techniques (EuRIC, 2021):

3463 — Manual sorting relies on human inspection of the waste. It is particularly accurate, especially when
3464 sorting reusable items, but it is labour-intensive and takes a relative long time.

3465 — Automated sorting uses machines equipped with near-infrared (NIR) spectroscopy to identify the
3466 colour and the surface composition of the items. It is fast, but it not as accurate as human
3467 inspection.

3468 — Hybrid sorting combines human inspection with automation to balance accuracy and efficiency.

3469 The sorting process is mainly challenged by the difficulty to accurately identify the fibre composition of the
3470 textile waste. On one hand, the reading of the fibre composition reported on labels is time consuming if done
3471 with human inspection. Information is not necessarily accurate or it could be even not accessible due to absence
3472 of the label or removal of the writing due to ageing processes. On the other hand, the use of near-infrared
3473 spectroscopy has difficulties when used for multi-layered items, or on items with layered fabrics, whose outer
3474 fibres are different from the inner ones.

3475 After sorting, the waste undergoes **pre-treatment**, which optimises the material processing in the specific
3476 recycling technique to be used. Usually, during pre-treatment, non-textile parts are separated from the parts
3477 containing fibres. This is commonly done manually, with loss of some part of the fabric, while new process
3478 techniques use mechanical separation together with shredding of the waste. Alternatively, other new process
3479 techniques allow disassembly of waste in cases where specific stitches have been used for the confectioning.
3480 These stiches can be loosened or dissolved under specific electromagnetic or heat treatments, respectively.
3481 During pre-treatment, fabrics are usually shredded to improve the efficiency of recycling technology adopted
3482 in the following step of the recycling system.

3483 **Table 51** reports the status of the **recycling techniques** in 2023. Available techniques were described via
3484 their feedstock, the main recycling output, the possibility to deal with disruptors and their maturity. Each
3485 technique can process feedstock with specific characteristics and can provide recycled fibres with specificities
3486 that affect their application in textile products. Additionally, disruptors like non-textile parts, dyes, coatings, and
3487 undesired fibres (e.g. elastane) could be an obstacle for some techniques, but not for all of them. The level of
3488 maturity of the techniques refers to 2023, but the general picture could rapidly change given the fast technical
3489 evolution of the sector.

3490 **Table 51.** Status of recycling techniques for textile waste in 2023

Recycling technique	Feedstock	Main output	Disruptors	Maturity of the technique and comments
Mechanical recycling	Textile waste almost exclusively constituted of cotton, wool, or synthetic fibres. Blends are usually not processed.	Recycled fibres are shorter than virgin fibres.	Non-textile materials have to be removed. Fibre contaminants and colours of feedstock will be transferred to recycled fibres. This usually requires colour sorting before recycling.	It is the most commonly used technology at scale. Recycled fibres have lower mechanical properties than virgin fibres. This usually forces the use of recycled fibres with virgin fibres. The mechanical characteristics of the recycled fibre limit its application. A portion of recycled fibre is usually not spinnable. The physical and mechanical characteristics of the recycled fibres highly depend of the status of fibres used as feedstock.
Thermo-mechanical recycling	Textile waste constituted of fibres based on thermoplastic polymers. High purity is required. Input textile waste should consist only of one polymer type (e.g. acrylic, nylon, polyester) or of compatible polymer types.	Polymers in the form of granulate or fibres	Non-textile materials have to be removed. Pigments and dyes remain in the output material.	It is at about TRL=7. During the process the polymers/fibres are deteriorated. Thus, recycled fibres should be blended with virgin fibres.
Chemical recycling for cellulosic fibres	Textile waste mainly constituted of cellulosic fibres. Presence of impurities and non-targeted fibres decreases the efficiency of the process. A specific process step removes impurities and non-targeted fibres.	Regenerated cellulose as pulp.	Non-textile materials are removed before or during the process. A process stage removes dyes and finishes. It has a bleaching step similar to the traditional wood pulp production.	Most technologies have reached high readiness (TRL=7-9). This is particularly true for feedstock with pure cotton. The potential degradation in length and strength of the cellulosic fibres influences the performance of the regenerated pulp.
Chemical recycling for synthetic fibres (mainly PES and PA6)	Textile waste constituted of at least 80-90% PES or PA6.	PES or PEG monomers/oligomers.	Non-textile materials are removed before or during the process. Contaminants like dyes can be handled to achieve homogeneous colours of recycled monomers/oligomers.	Depolymerisation techniques processing PA6 are operational at scale. Techniques processing PES have TRL=4-7 and are expected to enter the market within less than 5 years.

Recycling technique	Feedstock	Main output	Disruptors	Maturity of the technique and comments
Chemical recycling for wool-rich blends or polycotton fabrics	Textile waste rich in wool, or textile waste made of polycotton. A degree of contamination is accepted by specific techniques.	Depending on the process, the output is: - wool fibres ready for carding; - cellulosic pulp; - PES fibres, polymers, or monomers.	Non-textile materials are removed before or during the process. Colours can be removed also via bleaching.	Wool recycling using hydrochloric acid is at operational scale. The solvent-based dissolution and filtration technique used for polycotton is currently at TRL=5-6. The hydrothermal techniques used for polycotton are at TRL=6-7. The enzymatic technique used for polycotton is estimated to be at TRL=5.
Thermo-chemical recycling via pyrolysis and gasification	Textile waste with any fibre composition.	Syngas or pyrolysis oil, which could serve as a basis to produce methanol and then transform the methanol in different monomers for later polymer production.	Non-textile materials are removed before or during the process.	Pyrolysis has already been implemented as industrial scale (TRL 9), but applications for textile waste treatment are unknown. Syngas and pyrolysis oil are usually used as fuels.

3491 TRL: Technology Readiness Level, which is a 9-grade scale. TRL=1: Basic principles observed; TRL=2: Technology concept formulated; TRL=3: Experimental proof of concept; TRL=4: Technology validated in lab; TRL=5:
3492 Technology validated in relevant environment (industrially relevant environment in the case of key enabling techniques); TRL=6: Technology demonstrated in relevant environment (industrially relevant environment
3493 in the case of key enabling techniques); TRL=7: System prototype demonstration in operational environment; TRL=8: System complete and qualified; TRL=9: Actual system proven in operational environment
3494 (competitive manufacturing in the case of key enabling technologies; or in space).

3495 PES: polyester; PA6: polyamide/nylon 6; Polycotton: blend made of cotton and polyester

3496 Source: own elaboration based on (Duhoux et al., 2021; Lu et al., 2023; Huygens et al., 2023) and inputs from stakeholders.

3497

3498 Overall, the most used recycling technique is mechanical recycling which processes mono-fibre textiles,
3499 preferably cotton and wool. Blends are not usually processed with mechanical recycling because the output
3500 would be a mix of fibres with different properties that have very difficult application in textile products. This
3501 happens because the characteristics of the feedstock are directly transferred to the recycled fibres, which in
3502 addition have lower mechanical properties than fibres in the feedstock. These characteristics of the
3503 mechanically recycled fibres largely limit their applications and force to spin recycled fibres with virgin high-
3504 performing fibres (**Table 51**).

3505 Chemical recycling of man-made cellulosic fibres is also implemented at operational scale, especially when
3506 feedstock is made of pure cotton, even though process capacities in the EU are still low. Also regenerated
3507 cellulosic pulp has fibres with lower length and strength compared to the feedstock. Thus, mixing the recycled
3508 material with virgin material helps improving the performance of the yarn containing recycled cellulosic fibres.

3509 In chemical recycling of synthetic fibres, a different output is obtained processing polyamide-rich textiles via
3510 chemical recycling for nylon 6 (PA6 – polyamide), where the monomers can be further processed to build a
3511 synthetic fibre with characteristics comparable to the virgin material (**Table 51**).

3512 **Table 51** shows that blends are still difficult to recycle – only wool recycling using hydrochloric acid and
3513 depolymerisation techniques processing PA6 are implemented at scale. This represents a big technological
3514 challenge that should be addressed because the majority of textile apparel placed on the EU market is made
3515 with blends of natural and chemical fibres (48-60%). Single-fibre products account for smaller shares: 18-28%
3516 made of cotton, and 11-17% made of polyester (Refashion, 2023; Bakowska et al., 2025).

3517 This analysis allows to better understand information reported in **Table 21**, which shows that recycled fibres
3518 represent a very low share of the market and that the most recycled ones are wool (7%), polyamide (PA) (2%),
3519 cotton (1%), and MMCF (0.5%). Polyester is not included in this list because polyester fibres of recycled origin
3520 are currently manufactured from PET derived from packaging (separately collected plastic beverage bottles).

3521 Currently, the type of textile waste processed for the production of recycled fibres is mainly post-industrial. Also
3522 pre-consumer waste is used, but in lesser quantity. This happens because these types of waste:

- 3523 — Are available at manufacturing or retailing sites, thus they are already segregated from other
3524 waste fractions;
- 3525 — Do not need to be sorted, because they already are when generated;
- 3526 — Are constituted by undamaged and clean fibres;
- 3527 — Have known composition.

3528 In particular, post-industrial waste has no non-textile parts and is often free of coatings and other disruptors
3529 for the most used recycling techniques. This means that it can often be further processed without prior pre-
3530 treatment.

3531 Conversely, post-consumer waste has largely not been used as feedstock until now because its treatment is
3532 more challenging and expensive than the other waste types. The reasons for this are that: (1) post-consumer
3533 textile waste needs to be segregated from other waste fractions and sorted; (2) fibres are damaged, which
3534 would result in less performing mechanically recycled fibres; (3) requires fibre and chemical composition to be
3535 analysed – see sorting techniques. Although post-industrial and pre-consumer textile waste are currently the
3536 cheapest option, the resulting recycled fibres are still more expensive than virgin fibres.

3537 At present, textile products including recycled fibres report their recycled content either via a manufacturer
3538 declaration, or via a third party verification system. Since there is no laboratory test capable of determining the
3539 recycled or virgin origin of fibres, the only possible verification tool has to rely on chain of custody systems.

3540 The study of the literature and the preliminary exchange with stakeholders revealed that designers and recyclers
3541 have apparently opposite needs. The former uses fibre blends, dyes, coating and other current recycling
3542 disruptors to improve the performances of the textile product and simultaneously meet the taste of the users,
3543 who would like to buy products at low price (see section 9.2.1.1). The latter, due to the current status of recycling
3544 techniques (see **Table 51**), would need to process textile products made with only one fibre and carrying a
3545 minimum amount of disruptors.

3546 **Business models and user behaviour**

3547 A recent analysis performed by the JRC reported that recycling is not adequately in place and that the lack of
3548 a strong business case for recycling has negative effects on the business case of other economic actors in the
3549 recycling system, such as collectors and sorters (Huygens et al., 2023).

3550 The main barrier to the development of a market for recycled fibres results from the general low cost of
3551 products: from the raw material to the final product placed on the market. Textile products containing recycled
3552 fibres are more expensive than the same products made only of virgin fibres. The research conducted by the
3553 JRC found that the insufficient internalisation of externalities in the global textile supply chain produces
3554 economic market barriers to recycling. Therefore, the economy of scale for the establishment of a profitable
3555 recycling system is challenged due to (Huygens et al., 2023):

- 3556 — Technical limitations in recycling techniques (see **Table 51**);
- 3557 — The design of non-recyclable textile products (technological externalities);
- 3558 — Risk aversion to adopting recycled fibres by the next value chain user (consumption externalities);
- 3559 — The cost associated to the identification of feedstock characteristics suitable for the specific
3560 recycling technology.

3561 Despite the problem highlighted above, there are some fashion brands promoting the use of textile apparel
3562 with recycled content. Additionally, the preliminary exchange with some stakeholders revealed that a few large
3563 fashion brands are also promoting the collaboration between designers and operators in the recycling system
3564 to design recyclable textile apparel.

3565 With a growing interest in textile products containing recycled fibres, there should be also a growing demand
3566 for certification schemes based on chain of custody systems capable of tracking the source of the recycled
3567 fibres used.

3568 Users contribute to increasing the demand for textile products containing recycled fibres. The analysis
3569 performed in Section 6.2.7 revealed that it is mostly young and educated individuals usually look for these
3570 products. The investigation performed by Pranta et al. (2024) revealed that individuals with higher income have
3571 a higher likelihood to purchase textile products with recycled content compared to individuals having a lower-
3572 income. This confirms the difficulty of recycled fibres to compete with virgin fibres.

3573 **Legislative framework**

3574 The legislative framework addressing the recycling system could be described focussing on the types of textile
3575 waste.

3576 Post-industrial textile waste is not subject to any specific legislation in the EU nor in producing third countries.
3577 The Waste Framework Directive (2008/98/EC) only establishes generic objectives to prevent waste generation
3578 but contains no specific provisions addressing this type of waste.

3579 Pre-consumer textile waste is addressed by the ESPR, which prohibits the destruction of unsold textile products
3580 in the EU. Only micro and small enterprises will be exempted from this prohibition. However, the ESPR only
3581 addresses unsold products in the EU, while it does not address pre-consumer textile waste generated at
3582 manufacturing stage in third countries. The authors are not aware of any legislation in third producing countries
3583 addressing pre-consumer textile waste.

3584 Post-consumer textile waste is addressed by the Waste Framework Directive (2008/98/EC) and the newly
3585 published Waste Shipment Regulation (2024/1157) (WSR)¹⁵³, regulating the management of post-consumer
3586 waste in EU and its potential shipment within the EU and from the EU to third countries, respectively. In
3587 particular, the proposal to establish Extended Producer Responsibility (EPR) schemes for textiles in all EU
3588 Member States should ensure that producers will cover the costs of textile waste management and research
3589 and development on e.g. recycling technologies (see Section 4.1.2).

3590 9.2.5.2 How to assess recyclability

3591 The analysis of the ecosystem reported in the section 9.2.5.1 suggests to address recyclability with an integral
3592 and dynamic approach assessing the evolution over time of all elements of the recycling system, from the

¹⁵³ Regulation (EU) 2024/1157 of the European Parliament and of the Council of 11 April 2024 on shipments of waste, amending Regulations (EU) No 1257/2013 and (EU) 2020/1056 and repealing Regulation (EC) No 1013/2006. Available at [this link](#).

3593 feedstock to all process techniques involved. To this aim, in the framework of this PS, a recyclable textile apparel
3594 must have the following five characteristics, which apply as soon as it becomes waste:

- 3595 1. It can be effectively collected;
- 3596 2. It can be sorted, i.e. segregated from other textile waste and sent to the subsequent suitable recycling
3597 pathways;
- 3598 3. It can be pre-treated before recycling, or can be sent directly to recycling without specific pre-
3599 treatment;
- 3600 4. Its fibre content can be fully used as feedstock for one or more recycling techniques to produce recycled
3601 fibres usable in textile products;
- 3602 5. It has no elements or substances in amounts that disrupt the collection, sorting, preparation for
3603 recycling and recycling, or that limit the use of the recycled fibre.

3604 Therefore, textile apparel that meets all these five characteristics is considered to be recyclable, otherwise it is
3605 not recyclable. This integrated approach was chosen to assess the recyclability of textile apparel because all
3606 elements in the recycling system are important. This integral approach based on these five characteristics is a
3607 similar approach used by the French Law n° 2020-105 ⁽¹⁵⁴⁾ to define recyclable textile products.

3608 The approach proposed in this PS does not include any geographical limitation of the processes involved,
3609 because it assumes that the recycling system will comply with the provisions on environmentally sound
3610 management of waste under the WSR, where it is required that the requirements applied in the country of
3611 destination ensure a similar level of protection of human health and the environment than the requirements
3612 stemming from Union legislation. Moreover, it does not refer to specific characteristics of the feedstock or
3613 particular process techniques, because it aims to promote the technological evolution from the perspectives of
3614 the product design, sorting and recycling techniques.

3615 Point 4 of the approach guarantees the successful application of the recycled fibre into any textile product. This
3616 choice takes into account: (a) the objective of the Textile Strategy to close the loop of materials in textile
3617 products, (b) the current technological limitations described in section 9.2.5.1, and (c) the fact that the
3618 application of recycled fibres into textile apparel will be described/promoted via the recycled content (see section
3619 9.2.5.4).

3620 Despite its integral and dynamic nature, this approach is in line with the generic definition of recyclability
3621 reported in section 9.1, which is inspired by the WFD. Moreover, this approach is applicable in the same way to
3622 all products in the scope of the PS, making no necessary any categorization in the context of recyclability.

3623 On the assumption that mandatory EPR for textiles based on the Commission proposal to amend the WFD is
3624 adopted, upon its entry into force, it will support this integrated approach because economic operators (i.e.
3625 fashion brands and retailers) placing products on the EU market would pay eco-modulated fees to support the
3626 waste management of textile apparel. It is envisaged that eco-modulation of EPR fees for textiles will be based
3627 on future ecodesign criteria, which could include recyclability requirements. In this framework, designers and
3628 economic actors of the recycling system will be invited to work side-by-side to place on the EU market recyclable
3629 products.

3630 The proposed approach will need to be complemented by a standardised verification system assuring that the
3631 textile apparel indeed complies with the five characteristics reported above.

3632 9.2.5.3 Description of the product technologies in the context of recyclability

3633 In the framework of recyclability, the product technologies could be described as follows.

- 3634 — BC are not recyclable;
- 3635 — BAT are products that currently can be processed by techniques reported in **Table 51**, which are
3636 implemented at scale, i.e. (1) single-fibre textile apparel recycled with mechanical recycling, (2)
3637 pure cotton textile apparel recycled with chemical recycling for the production of MMCFs, (3) PE6-

¹⁵⁴ LOI n° 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire. Available at [this link](#). Last accessed on 22 October 2024.

3638 rich textile apparel recycled with chemical recycling for synthetic fibres, and (4) wool-rich blends
3639 recycled with chemical recycling based on hydrochloric acid.

3640 — BNAT are products that can be processed with techniques at intermediate maturity level reported
3641 in **Table 51**.

3642 However, the definition of these BAT and BNAT establishes some biases in terms of fibre composition and
3643 absence of specific components or substances in the product, which does not reflect the technological neutrality
3644 pursued in this PS. The development of design options in Task 6 will address this lack of technological neutrality.

3645 9.2.5.4 How to assess recycled content

3646 The analysis of the ecosystem related to recyclability and recycled content suggests to connect the assessment
3647 of the recycled content with the recyclability of the textile apparel and with the type of textile waste treated.
3648 The assessment takes into account two main aspects:

- 3649 • The availability of recyclable textile apparel, which implies the production of a recycled fibre
3650 with performances suitable for the use in textile apparel;
- 3651 • A verification system capable to track fibres coming from post-consumer textile waste.

3652 The first aspect is very much connected to the definition of recyclable textile apparel reported in section 9.2.5.2.
3653 This connection allows to close the loop for fibres used in textile apparel and guarantees the availability of
3654 recycled fibres. Only if recyclable textile products are placed on the market, there will be availability of recycled
3655 fibres to be used in new items. In particular, the reference to the performance of recycled fibres takes into
3656 account the technological developments in spinning techniques, which over time will be capable to spin fibres
3657 with lower performances.

3658 The second aspect narrows down the type of textile waste that can be used to produce the recycled fibres.
3659 **Table 52** reports a description of the three types of textile apparel waste in the context of recyclability and
3660 recycled content. Although post-industrial and pre-consumer textile waste have evident technical advantages
3661 when they are used to produce recycled fibres, they are often the result of overproduction, overconsumption
3662 and can be also attributed to inefficiencies in the production system (section 9.2.4.2). The inclusion of post-
3663 industrial textile waste as a source of the recycled content for new textile apparel could incentivise the
3664 generation of this type of waste. Furthermore, this textile waste type is also the only one that is not specifically
3665 regulated (**Table 52**).

3666 The second aspect excludes the use of pre-consumer waste because its generation is not fully regulated. When
3667 it is generated at manufacturing stage outside EU, it is not addressed by any legislation. When it is generated
3668 at manufacturing and retailer stages in EU, it is addressed by the ESPR, which forbids the destruction of unsold
3669 textile products in the EU. However, the ESPR does not address pre-consumer waste generated by micro and
3670 small enterprises. Also the inclusion of these types of textile waste as the source of the recycled content of a
3671 new item would incentivise their generation especially when it occurs at manufacturing stage outside EU (**Table**
3672 **52** and section 9.2.4.2). Sections 5.1 and 5.2 report that the largest majority of the EU consumption is affected
3673 by the production occurring outside EU.

3674 Therefore, in the framework of the PS, the definition of recycled content should be narrowed down compared
3675 to that reported by the ISO 14021 and used in section 9.1. Following the two aspects reported above, *the*
3676 *recycled content is the proportion, by mass, of recycled fibres coming from recyclable textile apparel disposed*
3677 *of as post-consumer waste.*

3678 The recycled content of a new textile apparel is fibre-specific, and it is also specific to the function that the item
3679 must provide. For this reason, all products included in scope are described by the framework reported in this
3680 section. A categorization of the products in scope based on the types of fibres and the specific function to be
3681 provided by the item would result in a disproportionate number of categories, which would not meet the aims
3682 of the PS.

3683

Table 52. Description of the textile apparel waste in the context of the recyclability and the recycled content

Characteristic	Post-industrial	Pre-consumer	Post-consumer
Status of the material	Undamaged and clean fibres.	Undamaged and clean fibres.	Worn material with damaged fibres. It is often relatively dirty, with various form of stains and moist content, generating mould and hygienic problems.
Non-textile components	Absent	Present	Present
Knowledge of fibre composition	Known and detailed by the manufacturer.	Based on what is reported on the label in accordance with the TLR. The reading of one label allows the identification of fibre composition of the entire collection.	Based on the analysis of the item's surface via infrared spectroscopy.
Degree of heterogeneity	Very low – homogeneous waste	Low	Very high
Location of generation	Manufacturing stage (available in producing countries, which are mainly countries in Asia - see Sections 5.1 and 5.2)	- Manufacturing stage (available in producing countries, which are mainly countries in Asia - see Sections 5.1 and 5.2) - Retail stage (available in EU)	User stage (available in EU)
Sorting	Not always needed, because it is already sorted in the moment of generation.	Not always needed. - Products belonging to collections that not reach the customer are already sorted; - Returned products could need some sorting depending on the retailer logistic.	Needed
Pre-treatment	It is ready for recycling because it includes mainly cuts of fabrics. Potentially, only shredding is needed.	Needed	Needed
Regulating legislation	Most of the production occurs in Asian countries, where the authors did not find any legislation addressing the generation of this type of waste. Very little production occurs in EU. The generation of post-industrial waste generated in EU are not specifically regulated. The WFD sets only generic objectives to prevent waste generation. The shipment of post-industrial waste generated in EU is subjected to the WSR. The material described here as post-industrial waste could in some Member States be also identified as a by-product, which would put it out of the scope of the WSR.	Waste generated at manufacturing stage: - Not addressed by any legislation identified by the authors if production occurs outside EU; - Addressed by the ESPR, which bans destruction of unsold products, with exemption only for micro and small enterprises. Waste generated at retailer stage are addressed by the ESPR, which bans destruction of unsold products, with exemption only for micro and small enterprises. The shipment of post-industrial waste generated in EU are subjected to the WSR. However, unsold products that did not become waste are outside the scope of the WSR.	This type of waste is fully generated in EU and is addressed by the WFD (EPR and EoW), and the WSR.

3685 TLR: Textile Labelling Regulation (1007/2011)

3686 ESPR: Ecodesign for sustainable Product Regulation (2024/1781)

3687 WFD: Waste Framework Directive (2008/98/EC)

3688 EPR: Extended Producer Responsibility, under the WFD

3689 EoW: End-of-Waste criteria, under the WFD

3690 WSR: Waste Shipment Regulation (2024/1157)

3691 The analysis does not include transportation of the waste because it depends on the location of the treatment facilities.

3692 *Source: own production*

3693 9.2.5.5 Description of the product technologies in the context of recycled content

3694 In the framework of the recycled content, the base case of the product technologies would have no recycled
3695 content (see **Table 21**). Differently, the identification of BAT and BNAT should distinguish fibres and product
3696 functions.

3697 In general, when constructing fabrics, knitted products are generally better suited for incorporating mechanically
3698 recycled fibres due to their more flexible structure compared to woven fabrics (Boschmeier et al., 2024).
3699 However, a notable exception is represented by denim trousers, which can incorporate up to 20% post-consumer
3700 recycled material (Kuppen, 2024).

3701 **9.2.6 Environmental impacts**

3702 The product aspect on 'environmental impacts' is defined as any change to the environment, whether adverse
3703 or beneficial, wholly or partially resulting from a product during its life cycle.

3704 This section analyses the elements affecting the environmental impacts generated by the consumption of textile
3705 apparel in EU to best describe the product technologies. Therefore, the analysis reported in this section does
3706 not aim to give a comprehensive overview of the environmental impacts caused. Task 5 of the PS will include
3707 a comprehensive environmental assessment of the base case of products included in the scope.

3708 9.2.6.1 The ecosystem affecting the environmental impacts

3709 **Process techniques**

3710 For each stage of the life cycle of the product, there are numerous process techniques that contribute to the
3711 product development. Each of those techniques have different environmental performances. Therefore, the
3712 choice of process techniques plays a key role in the environmental impacts of textile apparel.

3713 Different levels of environmental impacts, related to specific process techniques, can be seen in production
3714 stages such as yarn manufacturing. A range of spinning techniques is available. Ring-spinning is the most
3715 commonly used in the textile industry due to its versatility in terms of the range of fibres that can be processed.
3716 Its main advantage is that it produces finer and stronger yarns than other spinning techniques due to good fibre
3717 control, orientation and alignment during spinning. However, it has high rates of power consumption, caused by
3718 the necessity of rotating the bobbin at a rate of one turn for each twist inserted. In contrast, open-end spinning
3719 was developed in an attempt to overcome the speed limitations of ring spinning. Another advantage is a
3720 reduction in energy consumption (Elhawary, 2015a). In the case of wool spinning processes, significant
3721 differences can be seen between fabric derived from carded yarn (woollen process) and fabric manufactured
3722 using combed yarn (worsted process) in terms of the quantity of lubricants applied, with 5% in the former and
3723 2% in the latter (Roth et al., 2023).

3724 Knitting is a mechanical process and involves knotting yarn together with a series of needles. The main knitting
3725 production methods are straight knitting, fully fashioned knitting, integral knitting, and complete textile apparel
3726 knitting. Straight knitting most commonly relies on the weft technique, which consists of using one continuous
3727 yarn which is fed to and looped in rows by one or more needles at a time. Fully fashioned knitting machines
3728 can produce custom-shaped sheets of fabric by adding/removing the stitches, so that there is little or no need
3729 for cutting panels, reducing the amount of discarded material. Integral knitting is an advancement of the fully
3730 fashioned knitting technique. An integral knitting machine is able to add additional trimmings as an integrated
3731 part of the fabric panel, reducing fabric losses from cutting, as well as sewing requirements. Finally, complete
3732 textile apparel knitting machines are able to knit complete textile apparel, eliminating the cutting and sewing
3733 steps altogether, decreases raw material consumption and producing higher-quality textile apparel (Roth et al.,
3734 2023).

3735 Another example of these differences can be seen in the dyeing process, in this case in terms of water
3736 consumption. In batch dyeing, a certain amount of textile material is loaded into a dyeing machine and brought
3737 to equilibrium with a solution containing the dye and the auxiliaries. An important parameter in dyeing is the
3738 liquor ratio of the equipment: the weight ratio between the total dry material and the total liquor (a liquor ratio
3739 of 1:10 means 10 litres of water for 1 kg of textile material). This parameter not only influences the amount
3740 of water and energy consumed in the dyeing process, but also plays an important role in the level of exhaustion
3741 of the dye and in the consumption of chemicals and auxiliaries. Dyeing machines vary greatly in their liquor
3742 ratios, depending also on the type of substrate to be dyed and its hydrophilicity. For instance, in woven and
3743 knitted fabrics, liquor ratios can vary from 1:2 in airflow equipment, to 1:40 in winch beck equipment (Roth et
3744 al., 2023). These differences will significantly influence the environmental impacts of final products. Dyeing can

3745 also be carried out in batch or in continuous/semi-continuous mode. Batch dyeing processes generally require
3746 higher water and energy consumption than continuous processes. Continuous and semi-continuous dyeing
3747 processes consume less water, but this also means a higher dyestuff concentration in the dye liquor.

3748 The term finishing covers all those treatments that serve to impart to the textile the desired end-use properties.
3749 These can include properties relating to visual effect, handle and special characteristics such as water and fire
3750 proofing. Finishing may involve mechanical/physical and chemical treatments. Among textile finishing
3751 processes, chemical ones are the most significant from the point of view of the emissions generated. As in
3752 dyeing, the emissions are relatively different between continuous and discontinuous processes. Continuous
3753 finishing processes do not require washing operations after curing.

3754 Finally, in terms of waste management techniques, a number of options are available, from landfilling and
3755 incineration, to mechanical recycling. In this case, as reported in Solis et al. (2024), recycling is a preferred
3756 pathway for most of the environmental impact categories.

3757 In essence, the wide variability of process techniques available to manufacture textile apparel has a
3758 fundamental relevance on the environmental impact of final products.

3759 **Business model of economic operators in the ecosystem**

3760 Companies have multiple choices in the definition of their strategies and business models. These choices imply
3761 different levels of environmental impact of the final product.

3762 As described in Section 5.5, two main models can be identified in the textile apparel industry (DG GROW, 2021a).
3763 A consumer-led model, where the requests of the consumer are the centre; and a brand-led operation model,
3764 where the brand dictates the design and the manufacture. Other classification of business models can also be
3765 made. For instance, in terms of supply chain approach. On one hand, there is the integrated approach, where
3766 the production is entrusted to internal suppliers and the logistics aims to quickly react to customers' demands.
3767 On the other hand, there is the centralised approach, where the production is mostly outsourced and supported
3768 by audit and quality control programmes. Hybrid versions of those business models can also be found. Each
3769 business model has different characteristics, each of them with different implications on the environmental
3770 impact of products. In this section, a brief description of these characteristics is made.

3771 The trend turnover is a fundamental factor that defines a business model. Some companies opt to implement
3772 business models characterised by continuous novelty and disposable trends in constant change (Centobelli et
3773 al., 2022), designing their products for rapid trend turnovers through obsolescence and early disposal. Other
3774 companies, in contrast, implement business models with less frequent trend turnovers, focusing on product
3775 durability and reverse logistics. The number of seasons or trends that are placed on the market largely affects
3776 the environmental impacts. Rapid trend turnovers tend to drive consumers (directly or indirectly) to replace
3777 clothes, even when it is still not necessary from technical perspective.

3778 Related with trend turnover is production time, which refers to the time between the design of the product and
3779 the availability of such product for the consumer. Production time largely affects several aspects of the supply
3780 chain, from procurement to manufacturing capacity, planning and inventory management. Shorter production
3781 times increases the probability of manufacturing errors. This also increases the generation of waste, due to the
3782 required destruction of products that cannot be sold (see section 9.2.4). Shorter production times also requires
3783 the use of air transport, rather than cargo ships, increasing the environmental impact of the distribution stage.

3784 The location of different stages of the supply chain also affects the environmental impact of products. Many
3785 companies outsource the transformation process of raw materials into completed textile apparel to third
3786 countries, often to allow access to low-cost labour and less stringent environmental regulations, such as water
3787 or air emission levels which are less ambitious than in the country of origin (Centobelli et al., 2022). If the
3788 numerous stages of the supply chain are scattered over the globe, more transport is required, increasing the
3789 environmental impact of the distribution stage.

3790 The location of different stages of the supply chain also affects the energy source used to produce textile
3791 apparel. The manufacturing of textile apparel is energy intensive. Each country has a different energy mix ⁽¹⁵⁵⁾
3792 that has a significant influence on the impact of the final product.

¹⁵⁵ A different combination of energy sources to produce electricity

3793 Different environmental impacts can also be expected, related with the ownership of the apparel. There are
3794 companies that opt for renting products rather than selling them to individuals. When a product is rented, it has
3795 the possibility to be used by more consumers. This is particularly true for products that are not used very
3796 frequently –such as gala dresses– or for products that quickly become unusable –such as clothes for children–.
3797 In principle, products sold under this business model (sold as a service rather than a product) produce lower
3798 environmental impacts, due to the higher intensity of use among different users across their lifetime.

3799 Textile apparel that is commercialized as a service (rented, shared, etc.) will need higher levels of physical
3800 durability, which can require for example a more dense fabric with higher amount of fibres and electricity
3801 compared to products with lower performances. This, among other process techniques imply different levels of
3802 environmental impacts of the final product.

3803 In essence, decisions made by companies in terms of the business model implemented to place textile apparel
3804 on the market have a significant relevance on the environmental impact of the final product.

3805 **User behaviour**

3806 User behaviour is an important aspect that affects the environmental impact of textile apparel.

3807 Consumers influence the environmental impact of clothing when they make purchase decisions. Apparel is often
3808 bought spontaneously, simply because leisure and fun are associated with the act of buying clothes. Only a
3809 minority of consumers inform themselves correctly before buying apparel (Kleinhüchelkotten et al., 2018b).
3810 When a consumer chooses to acquire a product that has been placed on the market under a business model
3811 based on fast trend turnovers and short production times, they are contributing –possibly unknowingly– to the
3812 environmental impacts associated with that business model. The amount of products that are purchased also
3813 influences overall environmental impact of clothing.

3814 Consumers also have an influence on the environmental impact of textile apparel, depending on the way they
3815 use and maintain these products. Using clothes in the right environment contributes to increase their lifespan.
3816 Storing and folding apparel may also have an influence on the lifespan of apparel, since it may affect their
3817 intrinsic quality.

3818 Related with product use are the unwritten social rules that govern specific gatherings, such as workplaces,
3819 celebrations such as weddings or regional festivities that last several days. In these events, it is expected that
3820 attendees will not wear the same apparel on different days. The expectation is that different apparel will be
3821 worn on different days, even when it is not necessary from technical point of view. This contributes to an
3822 increased consumption and production of textile apparel, and therefore to their environmental impact.

3823 Maintenance activities can also contribute to increase lifespan of products and avoid (or delay) the acquisition
3824 of new products, minimising the overall environmental impact. Clothes must be sorted appropriately before
3825 washing to avoid premature deterioration. On occasions, consumers use quantities of detergent and softeners
3826 which are merely based on their perception, rather on manufacturers' recommendations (A.I.S.E, 2017a),
3827 potentially increasing the impact of the product use stage. In terms of washing, water temperature and washing
3828 frequency are not always optimised, contributing to an excessive consumption of energy. Drying can be
3829 performed either naturally or using dryers, a choice which is highly related with user choice, availability of space
3830 in the household or geographic location. The choice of clothes that do not need ironing –or that require less
3831 frequent ironing– can also have an influence on the environmental impact of the final product.

3832 Consumers also have an effect on the environmental impact of textile apparel when they make decisions related
3833 with its end of life. As pointed out in section 10.6.3.1, this is influenced by the individual characteristics of the
3834 consumers, their habits, demographic context, product traits and perceived quality (Cluver, 2008b; Goworek,
3835 Lynn Oxborrow, et al., 2020). Perceived quality of the product is a decisive factor to discard textile apparel
3836 (Aakko and Niinimäki, 2021). Low perceived quality also triggers early disposal (Piippo et al., 2022b). This is
3837 also magnified by the loss of symbolic value given by the consumer (Gwozd et al., 2017b). Discarding products
3838 when they are still technically functional increases their environmental impact, due to a low intensity of use.

3839 In essence, user behaviour of textile apparel can have a significant relevance in the environmental impact of
3840 final products.

3841 **Legislative framework and industrial best practices**

3842 The legislative framework has an influence as well on the environmental impact of final products.

3843 In the EU, the Industrial Emissions Directive aims to reduce industrial pollution by requiring industries to adopt
3844 preventive measures and use the best available techniques (BATq). It mandates integrated permits covering all

3845 environmental impacts and sets strict emission limits for key pollutants. This Directive applies to the
 3846 manufacturing of textile apparel. The BAT for the textiles industry are described in the Best Available Techniques
 3847 Reference Document (Roth et al., 2023). The end of life is addressed in the Best Available Techniques Reference
 3848 document for Waste Treatment (Pinasseau et al., 2018b).

3849 As pointed out in Section 5.7, countries outside of the EU tend to have less stringent measures about
 3850 environmental protection, in particular on emission limits for key pollutants. The EU has the most ambitious
 3851 legislative framework worldwide, covering aspects such as emissions to air and water, energy consumption and
 3852 energy efficiency, water use, waste generation, and usage and management of chemicals. Comparing this
 3853 framework with that of China, the top global exporter of apparel, it can be seen that the latter only addresses
 3854 emissions to air and water as well as waste generation. In contrast with the EU BREF, the Chinese framework
 3855 also covers noise emissions. With regards to India (the fifth global exporter of apparel), only emissions to water
 3856 are addressed. The full comparison of aspects covered in different Best Available Techniques reference
 3857 documents around the world can be seen in **Table 31**.

3858 A comparison in terms of specific substances is made in **Table 53**. The emission levels to water of three
 3859 substances/parameters are compared: chemical oxygen demand (COD), chromium and zinc (the comparison of
 3860 values on emissions to air was not possible due to different practices and key environmental indicators used in
 3861 the different frameworks). In **Table 53** it can be seen that there are significant differences in the level of
 3862 ambition between the EU, China and India.

3863 **Table 53.** Environmental performance levels for emission into water in specific regions

Key Environmental Indicator	EU	India	China
COD (mg/l)	40-100	100	7-30 000
Chromium (mg/l)	0.01-0.1	2	n/a
Zinc (mg/l)	0.04-0.5	n/a	n/a

3864 n/a: Not Addressed

3865 *Source: own production based on Section 5.7 and 10.5.2*

3866 The EU BREF sets the emission limits on COD between 40-100 mg/l for all activities and processes, whereas in
 3867 India and China those limits are set at 100 mg/l in the former and between 7-30 000 mg/l in the latter. In the
 3868 case of chromium, China does not establish a limit. The EU limit is established between 0.01-0.1 mg/l, more
 3869 ambitious than the 2 mg/l set in India. In terms of zinc, only the EU establishes a limit value, between 0.04-0.5
 3870 mg/l.

3871 These differences are particularly relevant for textile apparel, since most of the activities related with raw
 3872 material production and manufacturing occur out of the EU (in countries such as China or India). Deciding to
 3873 manufacture products outside of the EU means that the emission levels of manufacturing plants will be subject
 3874 to less stringent emission requirements. Therefore, considering the relevance of the manufacturing stage in
 3875 textile apparel, producing textile apparel outside of the EU increases the environmental impact of the final
 3876 product. Moreover, companies producing textile apparel in the EU must face higher costs than companies
 3877 producing outside of the EU, due to the prevention and reduction of emission activities that they need to
 3878 implement.

3879 9.2.6.2 How to assess the environmental impacts and description of product technologies

3880 The analysis of the ecosystem affecting the environmental impact of textile apparel shows the difficulty to
 3881 identify in a rigid framework the characteristics of specific product technologies. However, the information
 3882 gathered in the previous sections allow to build a reasonable picture.

3883 The BC takes into account that China, India, and Bangladesh manufacture the largest part of textile apparel
 3884 consumed in EU. This means that the BC is described by process techniques adopted in these countries, where
 3885 the legislation allows higher emission into the environment compared to what happens in EU. The business
 3886 model that characterises the BC promotes overproduction and overconsumption, supported by users that tend
 3887 to change frequently their wardrobe. The end of life of the BC is described by landfilling and incineration of
 3888 textile waste in the EU as well as in third countries.

3889 The BAT takes into account EU manufacture and the currently available less-impacting business models, user
 3890 behaviours and waste management options. This means that the BAT is described by process techniques
 3891 adopted in EU and described in the EU-BREF. The business model that characterises the BC promotes a
 3892 production rate similar to that before 2004, when the apparent consumption of EU was about half of the current

3893 one (**Figure 10** in Section 5.2). The end of life of the BAT is described by energy recovery and recycling in the
3894 EU of the textile waste.

3895 Since the environmental impacts are affected by very numerous aspects, the description of BNAT will be simply
3896 more ambitious than BAT and will take into account all the BNAT reported for other product aspects.

3897 This description of the product technologies is suitable for all products in the scope of the PS.

3898 **9.2.7 Presence of substances of concern**

3899 Substances of concern are defined in Article 2(27) of the Regulation and largely encompass substances that
3900 are of concern due to their negative effects upon the health of humans and to that of receptors in the
3901 environment as a consequence of their adverse long-term effects. These substances are specifically identified
3902 via being listed as (a) Substances of Very High Concern (SVHCs) in the REACH “Candidate List”, (b) by having a
3903 harmonised classification under specific hazard classes defined in the CLP Regulation or (c) by being identified
3904 as Persistent Organic Pollutants (POPs) by the POPs Regulation. In addition a specific class of SoCs are defined
3905 in ESPR, which (d) hinder reuse and recycling (of materials in the product in which SoCs are present) and which
3906 should be identified in the product-specific delegated acts to be developed under ESPR. It is worth noting that
3907 a single substance could potentially be identified simultaneously under several SoC classes (a, b, c and d).

3908 9.2.7.1 Ecosystem of Substances of Concern

3909 **Manufacturing factors and process techniques**

3910 A very large variety of chemical substances are used by the textile sector in the different manufacturing stages,
3911 from fibre production, to spinning, weaving or dyeing and finishing of fabrics, to name just a few of the many
3912 processes involved. Chemicals are used to make fabrics more durable, softer or to provide colour and colour-
3913 fastness or a water or stain-repellent finish, among many other uses. Some chemicals are specific to the
3914 different fibres used to make textiles (cotton, polyester, wool, etc.).

3915 It is not a simple task to determine the number of chemicals used by the textile sector, given the large variety
3916 of processes in which these are used, the multitude of functions they provide and the global distribution of
3917 chemicals supply chains and textile manufacturers. Roos et al. (2019) claim that the number of chemicals in
3918 use in the textile industry exceeds 15 000, with over 10 000 dyes and pigments and about 5 000 auxiliary
3919 chemicals, quoting figures from the Colour Index⁽¹⁵⁶⁾ and TEGEWA⁽¹⁵⁷⁾, respectively. A recent report¹⁵⁸ on the
3920 use of PFASs in the textile sector indicates that more than 8 000 chemical substances are used by this sector.
3921 Regardless of which the precise figure may be, the sheer numbers involved provide an indication of the
3922 magnitude of the challenges that the sector faces in implementing supply-chain transparency and traceability
3923 of chemicals.

3924 Although it is acknowledged that chemicals play an essential role in achieving a competitive textile apparel
3925 sector that satisfies the demands of consumers, reports such as that by the Swedish Chemicals Agency, that
3926 investigated 2 450 substances used by the textile sector and found 750 classified as hazardous for human
3927 health and 440 as hazardous for the environment, are a cause of concern (KEMI, 2014). As for other material
3928 streams, it is also acknowledged that legacy chemicals may be reintroduced back into the economy via recycled
3929 fibres.

3930 Similarly, a recent report by the European Environment Agency⁽¹⁵⁹⁾ on per- and polyfluoroalkyl substances
3931 (PFAS) highlights the specific concerns that this group of substances pose both due to their health and
3932 environmental impacts as well as because of their consequences on circularity. According to this study, it is
3933 estimated that textiles account for approximately 35% of the total global fluoropolymer demand and that a
3934 third of all PFAS in the EU (41 000 – 143 000 tonnes) are used in the textile sector, which is thereby estimated
3935 to be the biggest contributing use sector to PFAS pollution in Europe. Furthermore, in its report on textiles,
3936 published in the year 2017, the Ellen McArthur Foundation stated:

¹⁵⁶ <https://colour-index.com/>

¹⁵⁷ Textiles Auxiliaries e-market. <https://www.thk-online.net/>

¹⁵⁸ A Review of PFAS as a Chemical Class in the Textile Sector. Natural Resources Defense Council, 2021.
<https://saicmknowledge.org/library/review-pfas-chemical-class-textiles-sector-policy-brief>

¹⁵⁹ EEA 2024. Briefing no. 11/2024. PFAS in textiles in Europe's circular economy.
<https://www.eea.europa.eu/en/analysis/publications/pfas-in-textiles-in-europes-circular-economy>

3937 “The use of substances of concern in textile production has negative effects on farmers, factory workers, and
3938 the surrounding environment. While there is little data on the volume of substances of concern used across the
3939 industry, it is recognised that textile production discharges high volumes of water containing hazardous
3940 chemicals into the environment. As an example, 20% of industrial water pollution globally is attributable to the
3941 dyeing and treatment of textiles” (Ellen MacArthur Foundation, 2017).

3942 In this report a call for action is made in moving towards a new textiles economy, requiring, as regards
3943 substances of concern, to develop “a robust evidence base on the usage of chemicals, including the amount
3944 used, as well as identification of substances of concern and the impacts of these”.

3945 **User behaviour**

3946 Section 6 reports information available on behavioural trends among users with regards to textile apparel. It
3947 covers aspects that include the way users choose to buy apparel, their habits during the use phase, and why
3948 they decide to dispose of them. It also distinguishes user behaviour aspects at pre-purchase, post-purchase and
3949 disposal stages.

3950 In a survey spanning 27 EU Member States, 60% of 26 718 respondents perceive chemicals in apparel fabrics
3951 as minimally risky, with most not seeing them as a threat to people whereas, looking at the country level, health
3952 risks are deemed very important by about two-thirds of respondents in Germany and Slovakia whereas
3953 respondent in Denmark and the UK attributed a lower importance to this aspect (European Commission, 2009).
3954 Similar conclusions can be derived from a survey by Fashion Revolution (2020) which indicates that only about
3955 37% of respondents in United Kingdom, France, Germany, Italy, and Spain considers it important to buy apparel
3956 produced without harmful chemicals.

3957 Despite the uneven level of concern by users regarding chemicals in apparel, especially as regards substances
3958 that pose a risk to human health or to the environment, the establishment of information requirements under
3959 ESPR on the presence of substances, in particular of substances of concern in apparel will contribute to the
3960 generation of information that can further provide transparency to enable an informed public opinion. This in
3961 turn can inform possible actions that could be addressed in specific legislation on the safe use of chemicals
3962 such as REACH.

3963 **Business models**

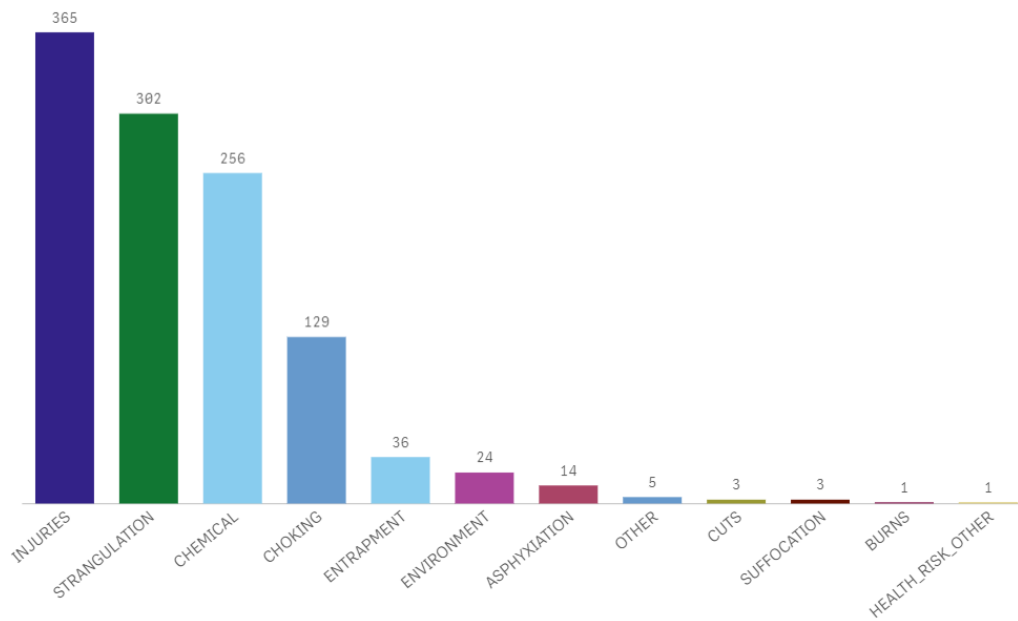
3964 The high throughput business models, already mentioned in previous sections, result in very short textile apparel
3965 manufacturing times, with the appearance of dozens of collections every year and where manufacturing occurs
3966 largely out of the EU. This model based on production happening largely out of the EU also has consequences
3967 related to the use of chemicals, given regulations on the use and management of chemicals differ, as do levels
3968 of enforcement, control and monitoring. According to Niinimäki et al. (2020), the majority of the chemicals use
3969 connected to producing textiles for the EU occurs outside the EU.

3970 Although it is not possible to pin-point impacts of the business model on specific chemicals, it seems clear that
3971 the large increase in production, taking place in third countries where often legislation and environmental
3972 controls and less stringent than in the EU, results in increased emissions of chemicals, notably via waste water
3973 during dyeing and washing processes, and can result in the use of substances that are regulated in the EU and
3974 other constituencies, which subsequently risk entering these markets, incorporated within textile products.
3975 Ogugbue and Sawidis (2011) state that some 0.7 million tons of synthetic dyes are produced annually
3976 worldwide and that the textile industry releases up to 200 000 tons per year of these dyes via effluents
3977 resulting from inefficient dyeing and finishing processes. Most of these dyes escape conventional wastewater
3978 treatment processes and persist in the environment. Evidence of the use of regulated hazardous substances in
3979 textiles, and of their presence in products imported into the EU can be found consulting alerts in Safety Gate⁽¹⁶⁰⁾,
3980 the EU rapid alert system for dangerous non-food products, where reports of textile apparel and footwear items
3981 can be found containing Chromium VI, nickel, different phthalates, cadmium and other regulated substances.
3982 An analysis of the total alerts registered in Safety Gate in the period 2019 – 2023 for the product category
3983 “Clothing_textiles” indicates that chemical risks are the third most frequent risk reported (22.5%).

¹⁶⁰ <https://ec.europa.eu/safety-gate-alerts/screen/search?resetSearch=true>

3984

Figure 26. Risks associated to textile apparel



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Source: EU Safety Gate statistical tool. Available at [this link](#). Last accessed on 13 November 2024

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Legislative frameworks and industrial practices

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As indicated in Section 4.1, currently there is no specific EU legislation addressing the mandatory sustainability of textiles, but EU Ecolabel criteria for textile products ⁽¹⁶¹⁾ exist, this being a voluntary scheme for companies willing to show the good environmental performance of their products. Article 6(6) and 6(7) of the Ecolabel Regulation (EC) No 66/2010 specify that the Ecolabel may not be awarded to products containing substances classified under CLP as toxic, hazardous to the environment, carcinogenic, mutagenic or toxic for reproduction or containing substances meeting the SVHC criteria defined in Article 57 of REACH. Derogations from this prohibition are possible except for substances identified as SVHCs and thereby listed in the so-called “Candidate List” established under REACH. The specific implementation of these general provisions into chemical-specific criteria applicable to textiles are developed as criteria 13 and 14 of the EU Ecolabel criteria for textile products enacted in Commission Decision 2014/350/EU and in the restricted substance list defined in its Appendix 1 and the list of restricted dyes specified in its Appendix 2.

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More specifically as regards limitations on chemicals, the REACH regulation has the main purpose of ensuring the safe use of chemicals in the EU. REACH regulates, amongst many other aspects, the restriction of the placing on the market and use of certain substances listed in its Annex XVII, including in some cases, the incorporation of substances into articles. The authorisation title of REACH applies to the placing on the market and use of substances of very high concern (SVHC), aiming at their progressive substitution by less hazardous substances or technologies and by subjecting their use to specific conditions.

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A number of restrictions in Annex XVII to REACH specifically mention textiles in their scope. These include entries: 4 - Tris (2,3 dibromopropyl) phosphate; 7 - Tris(aziridiny)phosphinoxide; 8 - Polybrominatedbiphenyls; 18 - Mercury compounds; 20 - Organostannic compounds; 43 - Azocolourants and Azodyes; 46/46a - Nonylphenol and Nonylphenol ethoxylates; 47 - Chromium VI compounds (relevant to leather articles); 68 - C9-C14 PFCAs and 72 - CMRs in textiles and footwear.

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Other restrictions, of general application to articles placed on the market for supply to the general public, or covering all articles placed on the market, may also apply to textile articles, for instance entries 50 – (certain) polycyclic aromatic hydrocarbons; 51 and 52 (certain phthalates); 61 - Dimethylfumarate; and 63 – Lead and its compounds.

¹⁶¹ EU Ecolabel criteria for textile products. Commission Decision of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products. Commission Decision (2014/350/EU). Available at [this link](#).

4014 Article 33 of REACH sets up a supply chain communication duty requiring suppliers of articles containing SVHC
 4015 above 0.1% to communicate certain information to the recipients of those articles. Furthermore, Article 9 of the
 4016 Directive 2008/98/EC, the Waste Framework Directive, promotes the reduction of the content of hazardous
 4017 substances in materials and products by defining a reporting obligation that apply to suppliers of articles (as
 4018 defined under REACH), requiring them to provide information regarding the presence of SVHC in articles,
 4019 including textile articles, pursuant to the referred Article 33, to the European Chemicals Agency (ECHA). This
 4020 information is collected in the SCIP database ⁽¹⁶²⁾, operated by ECHA, and access is provided to waste treatment
 4021 operators and consumers.

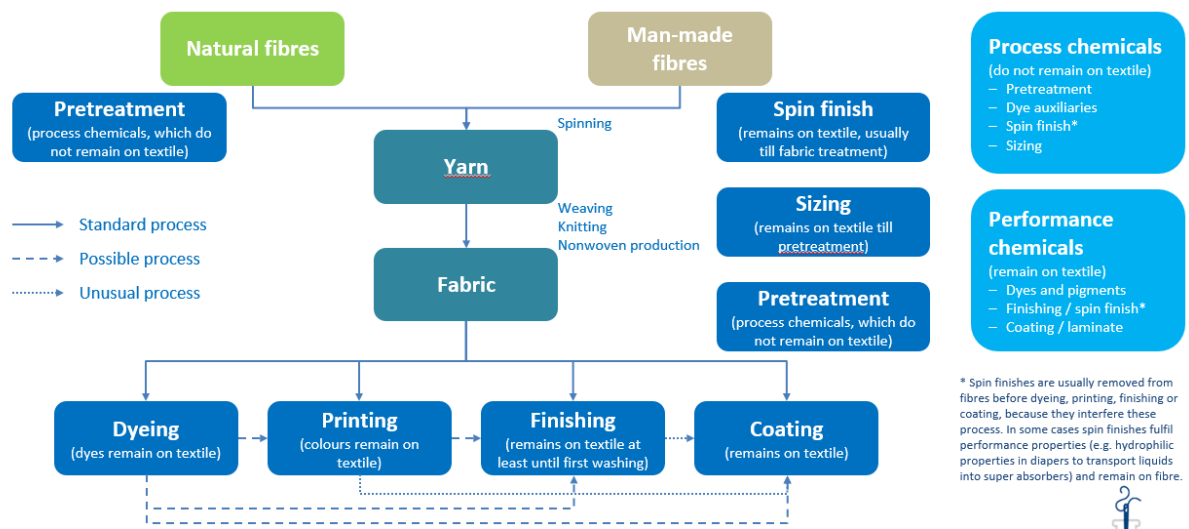
4022 Similarly to REACH, the POPs Regulation regulates persistent organic pollutants with the objective of protecting
 4023 human health and the environment by prohibiting, phasing out as soon as possible, or restricting the
 4024 manufacturing, placing on the market and use of substances subject to the Stockholm Convention. Some of
 4025 these restrictions are relevant to textiles, for instance those associated with certain brominated flame
 4026 retardants (e.g. certain PBDEs), surface-active substances such as PFOS or PFOA, or substances with biocidal
 4027 properties such as pentachlorophenol.

4028 Whereas the EU and many developed countries have legislation regulating chemicals, including their use by the
 4029 textile sector, such legislation does not exist or is less stringent in other countries where textile production takes
 4030 place. A recent report by Toxics Link ⁽¹⁶³⁾ highlights that “A review of the global regulatory requirements
 4031 highlights that there are stringent regulations concerning most of these chemicals only in the developed world,
 4032 especially in the EU; whereas, regulations on some of the chemicals either do not exist or are less stringent in
 4033 the developing or emerging economies”.

4034 9.2.7.2 Methodology to assess Substances of Concern

4035 As explained in previous sections, retailers and brands in the textile apparel sector are facing increasing
 4036 regulatory and reputational challenges to control chemicals present in their products. The sheer number of
 4037 chemicals involved, the complexity of supply chains and the fact that the majority of processes involving the
 4038 use of chemicals takes place in third countries, make tracking of chemicals in textiles a complex endeavour.
 4039 **Figure 27** provides an overview of processes using process and auxiliary chemicals.

4040 **Figure 27.** Processes using process and auxiliary chemicals



4041
 4042 Source: Adapted from EUCTL - European Chemistry for Textile and Leather, the European Association representing the companies that
 4043 operate in Europe, producing and putting on the market chemicals used in the textiles and leather value chains.

4044 KEMI (2014) describes the different types of chemicals used in textile production in terms of:

¹⁶² SCIP database from the European Chemical Agency. Available at [this link](#). Last accessed on 13 November 2024.

¹⁶³ An overview of toxic chemicals in textiles. Toxics Link 2021. <https://toxicslink.org/publications/reports/toxics-chemical-in-textile-report>

4045 Functional chemicals, which are intended to remain in the final article and are expected to be present at certain
4046 concentrations in order to achieve the desirable function. Some examples include:

- 4047 • Dyestuffs and pigments
- 4048 • Crease resistant agents
- 4049 • Anti-shrinking agents
- 4050 • Oil, soil and water repellents
- 4051 • Plasticisers
- 4052 • Flame retardants
- 4053 • Biocides for defined functionalities in articles, e.g. antibacterial agents
- 4054 • Stabilisers
- 4055 • Stiffening agents
- 4056 • Reactive resins for various finishing treatments

4057 Auxiliary (Process) chemicals, which are involved in some step of textile processing but are not intended to
4058 remain in the product. These include:

- 4059 • Organic solvents
- 4060 • Surfactants
- 4061 • Softeners
- 4062 • Salts
- 4063 • Acids and bases
- 4064 • Biocides as preservatives in the process or during storage and transport

4065 Unintended chemical substances - contaminants and degradation products

4066 These are chemicals not intended to remain in the finished article, such as contaminants and degradation
4067 products, have no function in neither the textile production process nor in the finished textiles.

- 4068 ○ Formaldehyde released from certain reactive resins
- 4069 ○ Polyaromatic hydrocarbons (PAH) impurities in pyrolysed products e.g Carbon Black
- 4070 ○ Arylamines derived from certain azo dyestuffs and pigments
- 4071 ○ Toxic metals (e.g heavy metals) due to impurities from the raw material

4072 Retailers and other operators placing textile apparel on the market have implemented chemical management
4073 strategies to enable compliance and to meet their due-diligence obligations as regards chemicals in their
4074 products. Effectively there are two types of approaches to obtain information about substances of concern in
4075 products.

4076 The **first** relies on **supply chain information** and the implementation of different **supply chain**
4077 **transparency measures**. In this sense retailers and other operators in the supply chain rely on declarations
4078 by suppliers, binding contractual terms and third party certification to provide information about substances in
4079 products, in particular about those which should not be present in them (positive lists). International and
4080 European sectorial initiatives have created relevant Restricted Substance Lists (RSLs) and Restricted
4081 Manufacturing Substance Lists (RMSLs) to capture and harmonise reporting of compliance regarding process
4082 and auxiliary substances regulated under different legislations and in different countries. Examples of these
4083 are the AFIRM Restricted Substances List ⁽¹⁶⁴⁾ and the ZDHC Manufacturing Restricted Substances List ⁽¹⁶⁵⁾ used
4084 by the textiles and footwear sectors. Other restricted substance-based approaches rely on certification of

¹⁶⁴ https://afirm-group.com/wp-content/uploads/2024/04/2024_AFIRM_RSL_2024_0404_EN.pdf

¹⁶⁵ <https://mrsl.roadmaptozero.com/>

4085 compliance with the requirements in different ecolabels. The EU Ecolabel for textiles, which has a strong focus
4086 on chemicals, as well as the privately managed Oeko-tex 100 standard for the textile sector ⁽¹⁶⁶⁾ are examples
4087 of this approach.

4088 Broader disclosure approaches for chemicals along textile supply chains, which require a high level of take-up
4089 and implementation and the necessary IT infrastructure, in a way not dissimilar to the digital product passport
4090 concept introduced under ESPR, have been the subject of numerous studies, pilots and initiatives. In this sense,
4091 UN/CFACT has recently provided a recommendation providing industry actors with a set of internationally agreed
4092 practices for the harmonized collection and transmission of data for tracking and tracing materials, products,
4093 and processes across an entire value chain (UNECE, 2022). Further detailed information on related blockchain
4094 based pilot projects, on the developed business requirements specification for traceability and transparency
4095 and on the associated data model can be download from the dedicated website ⁽¹⁶⁷⁾. A number of privately
4096 developed traceability information platforms ⁽¹⁶⁸⁾ focusing on the textile sector are already on the market. The
4097 EU funded Interreg project ECHT ⁽¹⁶⁹⁾, which has the purpose to Enable Digital Product Passports with Chemicals
4098 Traceability for a Circular Economy is also relevant.

4099 The **second approach** is **analytical** and relies on direct testing of textile apparel articles to verify the presence
4100 and concentration of specific substances of concern. This approach requires the existence of suitable analytical
4101 methods for the target chemicals, involves representative sampling of products and is costly. Consequently only
4102 targeted analyses have to date been applied to check compliance as regards regulated substances, usually
4103 following a risk based approach. AFIRM, ZDHC or the Oeko-tex standard provide information on available
4104 analytical methods for specific substances. Other sources of test method information, for instance as regards
4105 substances restricted under REACH, can be found in the Compendium of Analytical Methods recommended by
4106 the ECHA Forum to check compliance of REACH Annex XVII restrictions ⁽¹⁷⁰⁾. Such targeted assessments,
4107 checking for compliance of textile products have been carried out under the REACH4Textiles ⁽¹⁷¹⁾ project and,
4108 more recently, by IKEA and H&M in a project ⁽¹⁷²⁾ focusing on collected textile apparel targeted for fibre-to-fibre
4109 recycling.

4110 In general it can be stated that a combination of the two approaches is necessary. Both still have limitations in
4111 terms in accessibility of data, costs and capacity, especially for small and medium sized enterprises.

4112 9.2.7.3 Description of product technologies

4113 The use of chemicals in textile apparel manufacture is often related to the specific fibre type as well as to
4114 specific finishings (e.g. water-proofing) which are generally not product category specific. Consequently, at this
4115 point in the development of the project it is difficult to envisage the possibility of potential information or
4116 performance requirements that would be category specific.

4117 Building a base case (BC) and the definition of products representing the best available technology (BAT) is
4118 particularly challenging for chemicals, given the large number of substances used by the sector and the lack of
4119 quantitative information on the distribution of substances. For certain specific substances and substance
4120 families, BAT and BNAT products could potentially be defined in terms of products having switched to non-toxic
4121 or less toxic (or in general more sustainable) alternatives – e.g. alternatives to the use of PFAS. Given the current
4122 paucity of detailed information on SoCs in textile apparel, the setting of information requirements, as prescribed
4123 under ESPR, with justified exemptions and thresholds for declaration of substances, seems clearly warranted.

4124 9.3 Mutual influence of product aspects and product categorization

4125 The analysis reported in section 9.2 described the product technologies as result of the complex interaction
4126 among process techniques, business models, user behaviour and legislative frameworks in the perspective of
4127 each relevant product aspects. It was crucial to analyse product technologies in silos to better understand the
4128 complexity of the ecosystem belonging to each relevant ecodesign aspect. However, these product aspects are

¹⁶⁶ https://www.oeko-tex.com/importedmedia/downloadfiles/OEKO-TEX_STANDARD_100_Standard_EN_DE.pdf

¹⁶⁷ <https://unece.org/trade/traceability-sustainable-textile-apparel-and-footwear>

¹⁶⁸ Such as: TextileGenesis <https://textilegenesis.com/> ; Global Textile Scheme <https://www.globaltextilescheme.org/> and

¹⁶⁹ <https://echt.nweurope.eu/>

¹⁷⁰ ECHA 2021. https://www.echa.europa.eu/documents/10162/13577/compendium_of_analytical_methods_en.pdf/4c730fb9-1b48-2e14-6ee3-7a36391b7322

¹⁷¹ <https://www.centexbel.be/en/toxic-substances-textiles>

¹⁷² <https://hmgroupp.com/wp-content/uploads/2021/10/Press-release-HM-Group-and-IKEA-study.pdf>

4129 strictly connected to each other and influence each other. The analysis of product technologies already showed
4130 that:

- 4131 — Waste generation is strictly connected to recyclability and recycled content;
- 4132 — The recycled content depends on the recyclability and directly affects the physical durability
4133 whenever the recycled fibres have lower performances and are fed into the recycling process;
- 4134 — Physical durability is affected by maintenance and affects the repairability;
- 4135 — The use of specific chemicals and substances affects the physical durability, recycling and recycled
4136 content;
- 4137 — The environmental impacts are influenced by all the other relevant product aspects.

4138 The analysis of technologies must now find a synthesis in Task 5 and Task 6, when the environmental and
4139 economic model will describe the BC and the Design Options for each product category. In this way, the
4140 interactions among the relevant product aspects will be quantified to best find potential trade-offs to be
4141 expressed in the Design Options.

4142 The first step of this synthesis is the adoption of product categories valid for all relevant product aspects. In
4143 the case of textile apparel, this exercise is very simple because the only product aspect described via categories
4144 was the physical durability. This allows the adoption of the categories reported in **Table 44** of section 9.2.1.4
4145 as the product categorization to be used in the following steps of the development of the PS.

4146 Therefore, Task 5 will analyse 11 representative products, one for each product category: (1) Trousers, shorts
4147 and skirts excluding denim, (2) Denim trousers, shorts and skirts, (3) Sweaters, mid-layers and knitted dresses,
4148 (4) T-shirts and polo, (5) Shirts, (6) Blouses and woven dresses, (7) Jackets and coats, (8) Hosiery: leggings,
4149 stockings, tights and socks, (9) Underwear: underpants and boxers, (10) Swimwear, (11) Accessories.

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5146 **List of abbreviations**

5147	DPP	Digital Product Passport
5148	EC	European Commission
5149	ESPR	Ecodesign for Sustainable Product Regulation
5150	EU	European Union
5151	GPP	Green Public Procurement
5152	MEErP	Methodology for Ecodesign of Energy-related Products
5153	PEFCR A&F	Product Environmental Footprint Category Rules for Apparel and Footwear
5154	PS	Preparatory Study on textile products
5155	REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
5156	SVHC	Substance(s) of Very High Concern
5157	TLR	Textile Labelling Regulation (Regulation (EU) No 1007/2011)

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5321 **10 Annexes**

5322 **10.1 PRODCOM and market analysis**

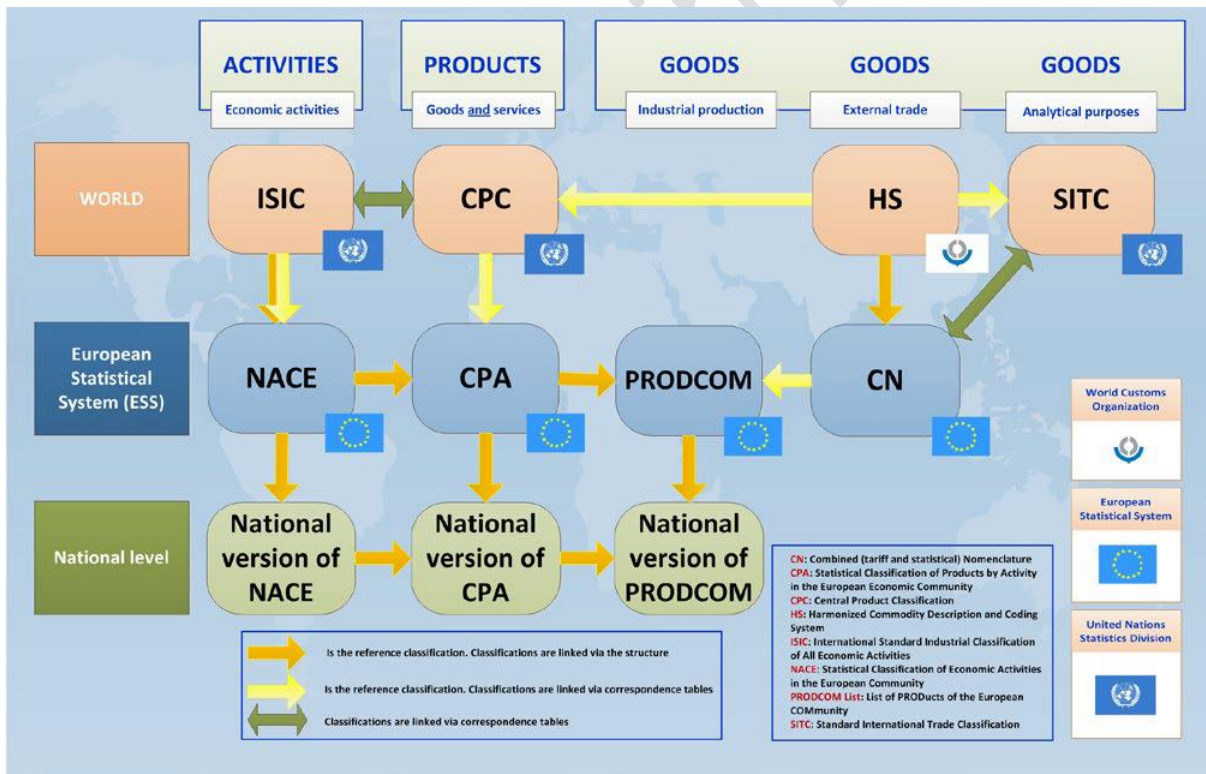
5323 **10.1.1 General description**

5324 PRODCOM is the classification of goods used for statistics in value and quantity on industrial production in the
 5325 EU. It is abbreviated from the French Production Communautaire and it is regulated by the Commission
 5326 Implementing Regulation (EU) 2020/1197 ⁽¹⁷³⁾. **Figure 28** shows the classification of activities, products and
 5327 goods at level of world, EU and Member States. **Figure 28** describes how PRODCOM classification relates to
 5328 the other classifications.

5329 PRODCOM was developed in a close relationship with Combined (tariff and statistical) Nomenclature (CN) for
 5330 external trades, which is strictly related to Harmonised System used in the World Custom Organization. The
 5331 basic building blocks of PRODCOM are the European Classification of Economic Activities (NACE) ⁽¹⁷⁴⁾ and the
 5332 European Classification of Products by Activity (CPA) ⁽¹⁷⁵⁾. Products are identified in PRODCOM via their eight-
 5333 digit code, the PRODCOM List ⁽¹⁷⁶⁾. The first four digits of a PRODCOM code refer to the NACE classification, the
 5334 first six digits refer to the CPA classification, and the last two digits are created specifically for PRODCOM.

5335

Figure 28. Statistical classifications



5336

5337

Source: (Eurostat, 2023)

¹⁷³ European business statistics. COMMISSION IMPLEMENTING REGULATION (EU) 2020/1197 of 30 July 2020 laying down technical specifications and arrangements pursuant to Regulation (EU) 2019/2152 of the European Parliament and of the Council on European business statistics repealing 10 legal acts in the field of business statistics. Available at [this link](#).

¹⁷⁴ The statistical classification of economic activities NACE Revision 2. Regulation (EC) No 1893/2006. Available at [this link](#).

¹⁷⁵ Statistical Classification of Products by Activity. COMMISSION REGULATION (EU) No 1209/2014 of 29 October 2014 amending Regulation (EC) No 451/2008 of the European Parliament and of the Council establishing a new statistical classification of products by activity (CPA) and repealing Council Regulation (EEC) No 3696/93. Available at [this link](#).

¹⁷⁶ PRODCOM list 2022. Available at [this link](#). Last accessed on 1 December 2023.

5338 NACE is based on the International Standard Industrial Classification of All Economic Activities (ISIC), which is a
5339 standard classification of economic activities used by the United Nations ⁽¹⁷⁷⁾. Both NACE and ISIC are four-digit
5340 codes, which define four levels of description from the first to the last digit: sections, divisions, groups and
5341 classes. At the level of division (the first two digits), NACE and ISIC are identical and refer to the same activity.
5342 At level of group and classes (the third and the fourth digits), NACE and ISIC refer to different
5343 products/activities ⁽¹⁷⁸⁾.

5344 The NACE codes were established in 1970. Along with the evolution of the industrial scenery, the NACE codes
5345 were subjected to several revisions resulting in changes over time. From 1995 to 2007, the PRODCOM data
5346 were based on NACE Rev. 1.1, whereas from 2008 onwards the PRODCOM data were based on NACE Rev. 2.
5347 The NACE Rev. 1.1 classification has 21 sections and 88 divisions, whereas the NACE Rev. 2 counts with 17
5348 sections and 62 divisions. The changes between different versions of NACE are supported by conversion tables,
5349 which can show sometimes (1) lack of direct correspondence between the old and new codes, and (2) merging
5350 of two or more codes into one ⁽¹⁷⁸⁾.

5351 Approximately every 2 or 3 years, the PRODCOM Working Group updates the PRODCOM list to reflect changes
5352 in the production of goods in the European Union. These changes occur with a frequency set by the technological
5353 developments in the industries and as driven by the related nomenclatures (Eurostat, 2023).

5354 **10.1.2 Features of PRODCOM data influencing market analysis**

5355 PRODCOM dataset DS-056120 includes several indicators ⁽²⁸⁾. In the PS, the following indicators were used:

- 5356 — PRODVAL: value of sold production
- 5357 — PRODQNT: quantity of sold production
- 5358 — EXPVAL: value of export
- 5359 — EXPQNT: quantity of export
- 5360 — IMPVAL: value of import
- 5361 — IMPQNT: quantity of import
- 5362 — QNTUNIT: unit used to report quantities

5363 The PRODCOM user's manual reports the following features (Eurostat, 2023).

5364 **PRODQNT**

5365 When a PRODCOM code does not report the unit in QNTUNIT, the figure of PRODQNT is not required to be
5366 reported. Additionally, figures could be missing due to confidentiality.

5367 **EXPQNT and IMPQNT**

5368 Comext ⁽¹⁷⁹⁾ is the dataset disseminating the international trades in goods statistics. PRODCOM extracts
5369 information from Comext. Most of PRODCOM codes have a complete reference to CN, meaning that there is full
5370 comparability between data from PRODCOM and data from CN. However, data could be missing from PRODCOM
5371 when:

- 5372 • the corresponding trade data on quantity cannot be provided for PRODCOM codes for which
5373 unit of measure is not consistent with unit of measure given in CN, even if a PRODCOM code
5374 has a complete CN reference and/or;
- 5375 • If there is no clear link between PRODCOM and CN.

5376 **Apparent consumption**

5377 The apparent consumption is obtained summing the production to the import and then subtracting the export.
5378 The use of this economic indicator should consider the following aspects:

¹⁷⁷ The UNSTATS webpage is available at [this link](#). Last accessed on 26 September 2023.

¹⁷⁸ The introductory guidelines to NACE Rev. 2. Available at [this link](#). Last accessed on 29 September 2023.

¹⁷⁹ Comext dataset. Available at [this link](#). Last accessed on 2 December 2023.

- 5379 1. The integration of production and trade data is challenged by the possible heterogeneity between the
5380 PRODCOM codes and the trade data reported by Comext.
- 5381 2. The thresholds above which businesses are represented in PRODCOM and Comext could differ.
- 5382 3. Data reported in PRODCOM refer to a specific year, but there are temporal delays in production, import
5383 and exports. However, the delays are reduced when data are considered over several years.
- 5384 4. The value of exports cannot always be compared directly with that of sold production.
- 5385 (a) Sold production is based on the ex-work selling price ⁽¹⁸⁰⁾, whereas exports are evaluated at
5386 the time the goods cross the border.
- 5387 (b) Imported goods can be exported again with a different value, either without being modified
5388 or after industrial processing.
- 5389 5. Some figures of quantity of sold production could be missing because of confidentiality or because
5390 Member States are exempted to report them when quantity units are not specified for the specific
5391 PRODCOM code.

5392 **10.1.3 Market analysis for the selection of the scope**

5393 The market analysis reported in Section 3.1.2 used the PRODCOM codes reporting about the NACE activities
5394 specified in **Table 54**.

5395 **Table 54.** NACE codes describing the product group of textiles and footwear

Subgroup	NACE codes
Textile apparel	C1412 - Manufacture of workwear C1413 - Manufacture of other outerwear C1414 - Manufacture of underwear C1419 - Manufacture of other wearing apparel and accessories C1431 - Manufacture of knitted and crocheted hosiery C1439 - Manufacture of other knitted and crocheted apparel
Home/interior textiles	C1392 - Manufacture of made-up textile articles, except apparel C1393 - Manufacture of carpets and rugs
Footwear	C1520 - Manufacture of footwear
Technical textiles	C1394 - Manufacture of cordage, rope, twine and netting C1395 - Manufacture of non-wovens and articles made from non-wovens, except apparel C1396 - Manufacture of other technical and industrial textiles C1399 - Manufacture of other textiles n.e.c.

5396

5397 **Table 55, Table 56, Table 57, and Table 58** report all the PRODCOM codes used for the analysis of amount
5398 of sales and trades in EU. They also report the conversion factors used for the quantification of quantities
5399 expressed in mass.

5400

5401

5402

¹⁸⁰ Ex-work selling price does not include any transportation cost, which are addressed by the buyer.

Table 55. PRODCOM codes describing the subgroup of textile apparel in 2019

PRODCOM code	Description of the PRODCOM code	QNT UNIT	Type	Conversion factor to kg
14121120	Men's or boys' ensembles, of cotton or man-made fibres, for industrial and occupational wear	p/st	S	0.5
14121130	Men's or boys' jackets and blazers, of cotton or man-made fibres, for industrial and occupational wear	p/st	S	0.95
14121240	Men's or boys' trousers and breeches, of cotton or man-made fibres, for industrial or occupational wear	p/st	S	0.45
14121250	Men's or boys' bib and brace overalls, of cotton or man-made fibres, for industrial or occupational wear	p/st	S	0.45
14122120	Women's or girls' ensembles, of cotton or man-made fibres, for industrial or occupational wear	p/st	S	0.5
14122130	Women's or girls' jackets and blazers, of cotton or man-made fibres, for industrial or occupational wear	p/st	S	0.95
14122240	Women's or girls' trousers and breeches, of cotton or man-made fibres, for industrial or occupational wear	p/st	S	0.45
14122250	Women's or girls' bib and brace overalls, of cotton or man-made fibres, for industrial or occupational wear	p/st	S	0.45
14123013	Men's or boys' other garments, of cotton or man-made fibres, for industrial or occupational wear	p/st	S	0.5
14123023	Women's or girls' other garments, of cotton or man-made fibres, for industrial or occupational wear	p/st	S	0.5
14131110	Men's or boys' overcoats, car-coats, capes, cloaks and similar articles, of knitted or crocheted textiles (excluding jackets and blazers, anoraks, wind-cheaters and wind-jackets)	p/st	S	0.95
14131120	Men's or boys' waistcoats, anoraks, ski-jackets, wind-cheaters, wind-jackets and similar articles, of knitted or crocheted textiles (excluding jackets and blazers)	p/st	S	0.95
14131230	Men's or boys' jackets and blazers, of knitted or crocheted textiles	p/st	S	0.95
14131260	Men's or boys' suits and ensembles, of knitted or crocheted textiles	p/st	S	0.5
14131270	Men's or boys' trousers, breeches, shorts, bib and brace overalls, of knitted or crocheted textiles	p/st	S	0.45
14131310	Women's or girls' overcoats, car-coats, capes, cloaks and similar articles, of knitted or crocheted textiles (excluding jackets and blazers)	p/st	S	0.95
14131320	Women's or girls' waistcoats, anoraks, ski-jackets, wind-cheaters, wind-jackets and similar articles, of knitted or crocheted textiles (excluding jackets and blazers)	p/st	S	0.95
14131430	Women's or girls' jackets and blazers, of knitted or crocheted textiles	p/st	S	0.95
14131460	Women's or girls' suits and ensembles, of knitted or crocheted textiles	p/st	S	0.5
14131470	Women's or girls' dresses, of knitted or crocheted textiles	p/st	S	0.3
14131480	Women's or girls' skirts and divided skirts, of knitted or crocheted textiles	p/st	S	0.25
14131490	Women's or girls' trousers, breeches, shorts, bib and brace overalls, of knitted or crocheted textiles	p/st	S	0.45
14132110	Men's or boys' raincoats	NA	NA	0.5
14132115	Men's or boys' raincoats, overcoats, car-coats, capes, etc.	p/st	NA	0.5
14132116	Men's or boys' overcoats, car coats, capes, cloaks, anoraks (including ski-jackets), wind cheaters, wind-jackets and similar articles (excluding suits, ensembles, jackets, blazers, trousers, bib and brace overalls, breeches and shorts)	NA	S	NA
14132120	Men's or boys' overcoats, car-coats, capes, etc.	NA	NA	0.95
14132130	Men's or boys' waistcoats, anoraks, ski-jackets, wind-jackets and similar articles (excluding jackets and blazers, knitted or crocheted, impregnated, coated, covered, laminated or rubberised)	p/st	NA	0.95
14132200	Men's or boys' suits & ensembles (excluding knitted or crocheted)	p/st	S	0.5
14132210	Men's or boys' suits (excluding knitted or crocheted)	NA	NA	1.4
14132220	Men's or boys' ensembles (excluding knitted or crocheted)	NA	NA	1
14132300	Men's or boys' jackets and blazers (excluding knitted or crocheted)	p/st	S	0.95
14132442	Men's or boys' trousers and breeches, of denim (excluding for industrial or occupational wear)	p/st	S	0.45

PRODCOM code	Description of the PRODCOM code	QNT UNIT	Type	Conversion factor to kg
14132444	Men's or boys' trousers, breeches and shorts, of wool or fine animal hair (excluding knitted or crocheted, for industrial or occupational wear)	p/st	S	0.45
14132445	Men's or boys' trousers and breeches, of man-made fibres (excluding knitted or crocheted, for industrial or occupational wear)	p/st	S	0.45
14132448	Men's or boys' trousers and breeches, of cotton (excluding denim, knitted or crocheted)	p/st	S	0.45
14132449	Men's or boys' trousers, breeches, shorts and bib and brace overalls (excluding of wool, cotton and man-made fibres, knitted or crocheted)	p/st	S	0.45
14132455	Men's or boys' bib and brace overalls (excluding knitted or crocheted, for industrial or occupational wear)	p/st	S	0.45
14132460	Men's or boys' shorts, of cotton or man-made fibres (excluding knitted or crocheted)	p/st	S	0.45
14133110	Woman's or girls' raincoats	NA	NA	0.5
14133115	Woman's or girls' raincoats and overcoats, etc.	p/st	NA	0.5
14133116	Women's or girls' overcoats, car-coats, capes, cloaks, anoraks (including ski jackets), wind-cheaters, wind-jackets and similar articles (excluding suits, ensembles, jackets, blazers, dresses, skirts, divided skirts, trousers, bib and brace overalls, breeches and shorts)	NA	S	NA
14133120	Woman's or girls' overcoats, etc.	NA		0.95
14133130	Women's or girls' waistcoats, anoraks, ski-jackets, wind-jackets and similar articles (excluding jackets and blazers, knitted or crocheted, impregnated, coated, covered, laminated or rubberised)	p/st	NA	0.95
14133200	Women's or girls' suits & ensembles (excluding knitted or crocheted)	p/st	S	0.5
14133210	Women's or girls' suits (excluding knitted or crocheted)	NA	NA	1.4
14133220	Women's or girls' ensembles (excluding knitted or crocheted)	NA	NA	1
14133330	Women's or girls' jackets and blazers (excluding knitted or crocheted)	p/st	S	0.95
14133470	Women's or girls' dresses (excluding knitted or crocheted)	p/st	S	0.3
14133480	Women's or girls' skirts and divided skirts (excluding knitted or crocheted)	p/st	S	0.25
14133542	Women's or girls' trousers and breeches, of denim (excluding for industrial or occupational wear)	p/st	S	0.45
14133548	Women's or girls' trousers and breeches, of cotton (excluding denim, for industrial or occupational wear)	p/st	S	0.45
14133549	Women's or girls' trousers and breeches, of wool or fine animal hair or man-made fibres (excluding knitted or crocheted and for industrial and occupational wear)	p/st	S	0.45
14133551	Women's or girls' bib and brace overalls, of cotton (excluding knitted or crocheted, for industrial or occupational wear)	p/st	S	0.45
14133561	Women's or girls' shorts, of cotton (excluding knitted and crocheted)	p/st	S	0.45
14133563	Women's or girls' bib and brace overalls, of wool or fine animal hair and man-made fibres (excluding cotton, knitted or crocheted, for industrial or occupational wear) and women's or girls' shorts, of wool or fine animal hair (excluding knitted or crocheted)	p/st	S	0.45
14133565	Women's or girls' shorts, of man-made fibres (excluding knitted or crocheted)	p/st	S	0.45
14133569	Women's or girls' trousers, breeches, bib and brace overalls, of textiles (excluding cotton, wool or fine animal hair, man-made fibres, knitted or crocheted)	p/st	S	0.45
14141100	Men's or boys' shirts, knitted or crocheted	p/st	S	0.25
14141220	Men's or boys' underpants and briefs, of knitted or crocheted textiles (including boxer shorts)	p/st	S	0.08
14141230	Men's or boys' nightshirts and pyjamas, of knitted or crocheted textiles	p/st	S	0.15
14141240	Men's or boys' dressing gowns, bathrobes and similar articles, of knitted or crocheted textiles	p/st	S	0.3
14141310	Women's or girls' blouses, shirts and shirt-blouses, of knitted or crocheted textiles	p/st	S	0.25
14141420	Women's or girls' briefs and panties, of knitted or crocheted textiles (including boxer shorts)	p/st	S	0.08
14141430	Women's or girls' nighties and pyjamas, of knitted or crocheted textiles	p/st	S	0.15
14141440	Women's or girls' negligees, bathrobes, dressing gowns and similar articles, of knitted or crocheted textiles	p/st	S	0.3
14141450	Women's or girls' slips and petticoats, of knitted or crocheted textiles	p/st	S	0.5

PRODCOM code	Description of the PRODCOM code	QNT UNIT	Type	Conversion factor to kg
14142100	Men's or boys' shirts (excluding knitted or crocheted)	p/st	S	0.25
14142220	Men's or boys' underpants and briefs (including boxer shorts) (excluding knitted or crocheted)	p/st	S	0.08
14142230	Men's or boys' nightshirts and pyjamas (excluding knitted or crocheted)	p/st	S	0.15
14142240	Men's or boys' singlets, vests, bathrobes, dressing gowns and similar articles (excluding knitted or crocheted)	p/st	S	0.3
14142300	Women's or girls' blouses, shirts and shirt-blouses (excluding knitted or crocheted)	p/st	S	0.25
14142430	Women's or girls' nightdresses and pyjamas (excluding knitted or crocheted)	p/st	S	0.3
14142450	Women's or girls' slips and petticoats (excluding knitted or crocheted)	p/st	S	0.5
14142460	Women's or girls' singlets and other vests, briefs, panties, negligees, bathrobes, dressing gowns, housecoats and similar articles of cotton (excluding knitted or crocheted)	p/st	S	0.08
14142480	Women's or girls' negligees, bathrobes, dressing gowns, singlets, vests, briefs and panties (including boxer shorts), of man-made fibres (excluding knitted or crocheted)	p/st	S	0.08
14142489	Women's or girls' singlets, vests, briefs, panties, negligees, bathrobes, dressing gowns and similar articles, of textiles (excluding cotton, man-made fibres, knitted or crocheted)	p/st	S	0.08
14142530	Brassieres	p/st	S	0.05
14142550	Girdles, panty-girdles and corselettes (including bodies with adjustable straps)	p/st	S	0.5
14142570	Braces, suspenders, garters and similar articles and parts thereof	NA	S	NA
14143000	T-shirts, singlets and vests, knitted or crocheted	p/st	S	0.17
14191100	Babies' garments and clothing accessories, knitted or crocheted including vests, rompers, underpants, stretch-suits, gloves or mittens or mitts, outerwear (for children of height <= 86 cm)	NA	S	NA
14191210	Track-suits, of knitted or crocheted textiles	p/st	S	0.5
14191230	Ski-suits, of knitted or crocheted textiles	p/st	S	0.5
14191240	Men's or boys' swimwear, of knitted or crocheted textiles	p/st	S	0.12
14191250	Women's or girls' swimwear, of knitted or crocheted textiles	p/st	S	0.12
14191290	Other garments, knitted or crocheted (including bodies with a proper sleeve)	kg	S	1
14191300	Gloves, mittens and mitts, of knitted or crocheted textiles	pa	S	0.1
14191930	Shawls, scarves, mufflers, mantillas, veils and the like, of knitted or crocheted textiles	p/st	S	0.1
14191960	Clothing accessories and parts thereof, of knitted or crocheted textiles (excluding gloves, mittens, shawls, scarves, mufflers, mantillas and veils)	NA	S	NA
14192100	Babies' clothing and accessories, of textiles, not knitted or crocheted (for children of height <= 86 cm) including vests, rompers, underpants, stretch-suits, napkins, gloves, mittens and outerwear	NA	NA	NA
14192150	Babies clothing and accessories, of textiles, not knitted or crocheted (for children of height <= 86 cm) including vests, rompers, underpants, stretch-suits, gloves, mittens and outerwear (excluding sanitary towels and napkins and similar articles)	NA	S	NA
14192210	Other men's or boys' apparel n.e.c., including tracksuits and jogging suits (excluding waistcoats, ski-suits, knitted or crocheted)	p/st	S	0.5
14192220	Other women's or girls' apparel n.e.c., including tracksuits and jogging suits (excluding waistcoats, ski-suits, knitted or crocheted)	p/st	S	0.5
14192230	Ski-suits (excluding of knitted or crocheted textiles)	p/st	S	0.5
14192240	Men's or boys' swimwear (excluding of knitted or crocheted textiles)	p/st	S	0.12
14192250	Women's or girls' swimwear (excluding of knitted or crocheted textiles)	p/st	S	0.12
14192310	Handkerchiefs	p/st	S	0.5
14192333	Shawls, scarves, mufflers, mantillas, veils and the like (excluding articles of silk or silk waste, knitted or crocheted)	p/st	S	0.15
14192338	Shawls, scarves, mufflers, mantillas, veils and the like, of silk or silk waste (excluding knitted or crocheted)	p/st	S	0.15

PRODCOM code	Description of the PRODCOM code	QNT UNIT	Type	Conversion factor to kg
14192353	Ties, bow ties and cravats (excluding articles of silk or silk waste, knitted or crocheted)	p/st	S	0.15
14192358	Ties, bow ties and cravats, of silk or silk waste (excluding knitted or crocheted)	p/st	S	0.15
14192370	Gloves, mittens and mitts (excluding knitted or crocheted)	pa	S	0.1
14192393	Clothing accessories of textiles (excluding shawls, scarves and mufflers, mantillas and veils, ties, bow-ties and cravats, gloves, mittens and mitts, knitted or crocheted)	NA	NA	NA
14192395	Parts of garments or of clothing accessories, of textiles (excluding bras, girdles and corsets, braces, suspenders and garters, knitted or crocheted)	NA	NA	NA
14192396	Clothing accessories, parts of garments or of clothing accessories, of textiles, n.e.c. and parts thereof, (excluding shawls, scarves and mufflers, mantillas and veils, ties, bow-ties and cravats, gloves, mittens and mitts and parts thereof; bras, girdles and corsets, braces, suspenders and garters, knitted or crocheted)	NA	S	NA
14193200	Garments made up of felt or non-wovens, textile fabrics impregnated or coated	p/st	S	0.1
14194130	Hat-forms, hat bodies and hoods, plateaux and manchons of felt (including slit manchons) (excluding those blocked to shape, those with made brims)	p/st	S	0.1
14194150	Hat-shapes, plaited or made by assembling strips of any material (excluding those blocked to shape, those with made brims, those lined or trimmed)	p/st	S	0.1
14194230	Felt hats and other felt headgear, made from hat bodies or hoods and plateaux	p/st	S	0.1
14194250	Hats and other headgear, plaited or made by assembling strips of any material	p/st	S	0.1
14194270	Hats and other headgear, knitted or crocheted or made-up from lace, felt or other textile fabric in the piece (but not in strips); hair-nets of any material	p/st	S	0.1
14194300	Other headgear (except headgear of rubber or of plastics, safety headgear and asbestos headgear); headbands, linings, covers, hat foundations, hat frames, peaks and chinstraps, for headgear	NA	S	NA
14311033	Panty hose and tights, of knitted or crocheted synthetic fibres, measuring per single yarn < 67 decitex	p/st	S	0.07
14311035	Panty hose and tights, of knitted or crocheted synthetic fibres, measuring per single yarn >= 67 decitex	p/st	S	0.07
14311037	Pantyhose and tights of textile materials, knitted or crocheted (excl. graduated compression hosiery, those of synthetic fibres and hosiery for babies)	p/st	S	0.07
14311050	Women's full-length or knee-length knitted or crocheted hosiery, measuring per single yarn < 67 decitex	pa	S	0.01
14311090	Knitted or crocheted hosiery and footwear (including socks; excluding women's full-length/knee-length hosiery, measuring <67decitex, panty-hose and tights, footwear with applied soles)	pa	S	0.07
14391031	Men's or boys' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of wool or fine animal hair (excluding jerseys and pullovers containing >= 50 % of wool and weighing >= 600 g)	p/st	S	0.5
14391032	Women's or girls' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of wool or fine animal hair (excluding jerseys and pullovers containing >= 50 % of wool and weighing >= 600 g)	p/st	S	0.5
14391033	Jerseys and pullovers, containing >= 50 % by weight of wool and weighing >= 600 g per article	p/st	S	0.3
14391053	Lightweight fine knit roll, polo or turtle neck jumpers and pullovers, of cotton	p/st	S	0.5
14391055	Lightweight fine knit roll, polo or turtle neck jumpers and pullovers, of man-made fibres	p/st	S	0.5
14391061	Men's or boys' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of cotton (excluding lightweight fine knit roll, polo or turtle neck jumpers and pullovers)	p/st	S	0.5
14391062	Women's or girls' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of cotton (excluding lightweight fine knit roll, polo or turtle neck jumpers and pullovers)	p/st	S	0.5
14391071	Men's or boys' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of man-made fibres (excluding lightweight fine knit roll, polo or turtle neck jumpers and pullovers)	p/st	S	0.5

PRODCOM code	Description of the PRODCOM code	QNT UNIT	Type	Conversion factor to kg
14391072	Women's or girls' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of man-made fibres (excluding lightweight fine knit roll, polo or turtle neck jumpers and pullovers)	p/st	S	0.5
14391090	Jerseys, pullovers, sweatshirts, waistcoats and cardigans, of textile materials (excluding those of wool or fine animal hair, cotton, man-made fibres)	p/st	S	0.5

5404 QNTUNIT: PRODCOM indicator about unit used to report quantities.
5405 kg = kilogram; p/st = number of items; pa = number of pairs; NA = data not available

5406 Source: own elaboration based on Eurostat data set DS-056120 (data extracted on 15 November 2023). Conversion factors used to convert the unit reported in EUROSTAT to kg based on (Huygens et al., 2023)

5407

5408 **Table 56.** PRODCOM codes describing the subgroup of home/interior textiles in 2019

PRODCOM code	Description of the PRODCOM code	QNTUNIT	TYPE	Conversion Factor to kg
13921130	Blankets and travelling rugs of wool or fine animal hair (excluding electric blankets)	p/st	S	0.5
13921150	Blankets and travelling rugs of synthetic fibres (excluding electric blankets)	p/st	S	0.5
13921190	Blankets (excluding electric blankets) and travelling rugs of textile materials (excluding of wool or fine animal hair, of synthetic fibres)	p/st	S	0.5
13921230	Bed linen of knitted or crocheted textiles	kg	S	1
13921253	Bed linen of cotton (excluding knitted or crocheted)	kg	S	1
13921255	Bed linen of flax or ramie (excluding knitted or crocheted)	kg	S	1
13921259	Bed linen of woven textiles (excluding of cotton, of flax or ramie)	kg	S	1
13921270	Bed linen of non-woven man-made fibres (excluding knitted or crocheted)	kg	S	1
13921330	Table linen of knitted or crocheted textiles	kg	S	1
13921353	Table linen of cotton (excluding knitted or crocheted)	kg	S	1
13921355	Table linen of flax (excluding knitted or crocheted)	kg	S	1
13921359	Table linen of woven man-made fibres and of other woven or non-woven textiles (excluding of cotton, of flax)	kg	S	1
13921370	Table linen of non-woven man-made fibres	kg	S	1
13921430	Toilet linen and kitchen linen, of terry towelling or similar terry fabrics of cotton	kg	S	1
13921450	Woven toilet linen and kitchen linen, of textiles (excluding terry towelling or similar terry fabrics of cotton)	kg	S	1
13921470	Toilet linen and kitchen linen, of non-woven man-made fibres	kg	S	1
13921530	Curtains and interior blinds, curtain or bed valances, of knitted or crocheted materials	m ²	S	0.25
13921550	Curtains and interior blinds, curtain or bed valances, of woven materials	m ²	S	0.25
13921570	Curtains and interior blinds, curtain or bed valances, of non-woven materials	m ²	S	0.25
13921620	Hand-woven tapestries of the type Gobelins, Flanders, Aubusson, Beauvais, and needle-worked tapestries (including petit point, cross-stitch) whether or not made up	NA	S	NA
13921640	Bedspreads (excluding eiderdowns)	p/st	S	0.5
13921660	Furnishing articles including furniture and cushion covers as well as cushion covers, etc. for car seats (excluding blankets, travelling rugs, bed linen, table linen, toilet linen, kitchen linen, curtains, blinds, valances and bedspreads)	NA	S	NA
13921680	Sets of woven fabrics and yarns for making up into rugs, tapestries, embroidered table cloths, serviettes, or similar textile articles, p.r.s.	NA	S	NA
13922130	Sacks and bags, of cotton, used for packing goods	kg	S	1

PRODCOM code	Description of the PRODCOM code	QNTUNIT	TYPE	Conversion Factor to kg
13922150	Sacks and bags, of knitted or crocheted polyethylene or polypropylene strip, used for packing goods	kg	S	1
13922170	Sacks and bags, of polyethylene or polypropylene strip, used for packing goods (excluding knitted or crocheted)	kg	S	1
13922173	Sacks and bags, of polyethylene or polypropylene strip, weighing <= 120 g/m2, used for packing goods (excluding knitted or crocheted)	NA	NA	NA
13922175	Sacks and bags, of polyethylene or polypropylene strip, weighing > 120 g/m2, used for packing goods (excluding knitted or crocheted)	NA	NA	NA
13922190	Sacks and bags, used for packing goods (excluding of cotton, polyethylene or polypropylene strip)	kg	S	1
13922210	Tarpaulins, awnings and sunblinds (excluding caravan awnings)	kg	S	1
13922230	Tents (including caravan awnings)	kg	S	1
13922250	Sails	kg	S	1
13922270	Pneumatic mattresses and other camping goods (excluding caravan awnings, tents, sleeping bags)	kg	S	1
13922300	Parachutes and rotachutes, parts and accessories (including dirigible parachutes)	kg	S	1
13922430	Sleeping bags	p/st	S	0.5
13922493	Articles of bedding of feathers or down (including quilts and eiderdowns, cushions, pouffes, pillows) (excluding mattresses, sleeping bags)	p/st	S	0.5
13922499	Articles of bedding filled other than with feathers or down (including quilts and eiderdowns, cushions, pouffes, pillows) (excluding mattresses, sleeping bags)	p/st	S	0.5
13922953	Floor-cloths, dish-cloths, dusters and similar cleaning cloths, of non-woven textiles	kg	S	1
13922957	Floor-cloths, dish-cloths, dusters and similar cleaning cloths (excluding knitted or crocheted, articles of non-woven textiles)	kg	S	1
13922990	Floor-cloths, dish-cloths, dusters and similar cleaning cloths, knitted or crocheted; life-jackets, life-belts and other made up articles	NA	NA	NA
13922993	Sanitary towels, tampons and similar article of textile materials (excluding wadding)	NA	NA	NA
13922997	Napkins and napkin liners for babies and similar article of textile materials (excluding wadding)	NA	NA	NA
13922998	Floor-cloths, dish-cloths, dusters and similar cleaning cloths, knitted or crocheted; life-jackets, life-belts and other made up articles (excluding protective face masks, sanitary towels and napkins and similar articles)	NA	S	NA
13922999	Floor-cloths, dish-cloths, dusters and similar cleaning cloths, knitted or crocheted; life-jackets, life-belts and other made up articles (excluding sanitary towels and napkins and similar articles)	kg	NA	1
13931100	Knotted carpets and other knotted textile floor coverings	m ²	S	1.6
13931200	Woven carpets and other woven textile coverings (excluding tufted or flocked)	m ²	S	1.6
13931300	Tufted carpets and other tufted textile floor coverings	m ²	S	1.38
13931930	Needlefelt carpets and other needlefelt textile floor coverings (excluding tufted or flocked)	m ²	S	1.6
13931990	Carpets and other textile floor coverings (excluding knotted, woven, tufted, needlefelt)	m ²	S	1.6

5409 QNTUNIT: PRODCOM indicator about unit used to report quantities.

5410 kg = kilogram; p/st = number of items; NA = data not available, m²=square metres

5411 Source: own elaboration based on Eurostat data set DS-056120 (data extracted on 15 November 2023). Conversion factors used to convert the unit reported in EUROSTAT to kg based on (Huygens et al., 2023)

5412

5413 **Table 57.** PRODCOM codes describing the subgroup of footwear in 2019

PRODCOM code	Description of the PRODCOM code	QNTUNIT	TYPE	Conversion Factor to kg
15201100	Waterproof footwear, with uppers in rubber or plastics (excluding incorporating a protective metal toecap)	pa	S	0.9
15201210	Sandals with rubber or plastic outer soles and uppers (including thong-type sandals, flip flops)	pa	S	0.5
15201231	Town footwear with rubber or plastic uppers	pa	S	0.9

PRODCOM code	Description of the PRODCOM code	QNTUNIT	TYPE	Conversion Factor to kg
15201237	Slippers and other indoor footwear with rubber or plastic outer soles and plastic uppers (including bedroom and dancing slippers, mules)	pa	S	0.35
15201330	Footwear with a wooden base and leather uppers (including clogs) (excluding with an inner sole or a protective metal toe-cap)	pa	S	0.9
15201351	Men's town footwear with leather uppers (including boots and shoes; excluding waterproof footwear, footwear with a protective metal toe-cap)	pa	S	0.9
15201352	Women's town footwear with leather uppers (including boots and shoes; excluding waterproof footwear, footwear with a protective metal toe-cap)	pa	S	0.9
15201353	Children's town footwear with leather uppers (including boots and shoes; excluding waterproof footwear, footwear with a protective metal toe-cap)	pa	S	0.9
15201361	Men's sandals with leather uppers (including thong type sandals, flip flops)	pa	S	0.5
15201362	Women's sandals with leather uppers (including thong type sandals, flip flops)	pa	S	0.5
15201363	Children's sandals with leather uppers (including thong type sandals, flip flops)	pa	S	0.5
15201370	Slippers and other indoor footwear with rubber, plastic or leather outer soles and leather uppers (including dancing and bedroom slippers, mules)	pa	S	0.35
15201380	Footwear with wood, cork or other outer soles and leather uppers (excluding outer soles of rubber, plastics or leather)	pa	S	0.9
15201444	Slippers and other indoor footwear (including dancing and bedroom slippers, mules) with uppers of textile materials	pa	S	0.35
15201445	Footwear with rubber, plastic or leather outer soles and textile uppers (excluding slippers and other indoor footwear, sports footwear)	pa	S	0.9
15201446	Footwear with textile uppers (excluding slippers and other indoor footwear as well as footwear with outer soles of rubber, plastics, leather or composition leather)	pa	S	0.9
15202100	Sports footwear with rubber or plastic outer soles and textile uppers (including tennis shoes, basketball shoes, gym shoes, training shoes and the like)	pa	S	0.9
15202900	Other sports footwear, except snow-ski footwear and skating boots	pa	S	0.9
15203120	Footwear (including waterproof footwear), incorporating a protective metal toecap, with outer soles and uppers of rubber or of plastics	pa	S	0.9
15203150	Footwear with rubber, plastic or leather outer soles and leather uppers, and with a protective metal toe-cap	pa	S	0.9
15203200	Wooden footwear, miscellaneous special footwear and other footwear n.e.c.	pa	S	0.9
15204020	Leather uppers and parts thereof of footwear (excluding stiffeners)	NA	S	NA
15204050	Uppers and parts thereof of footwear (excluding stiffeners, of leather)	NA	S	NA
15204080	Parts of footwear (excluding uppers) other materials	NA	S	NA

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QNTUNIT: PRODCOM indicator about unit used to report quantities.

pa = number of pairs; NA = data not available

Source: own elaboration based on Eurostat data set DS-056120 (data extracted on 15 November 2023). Conversion factors used to convert the unit reported in EUROSTAT to kg based on (Huygens et al., 2023).

Table 58. PRODCOM codes describing the subgroup of technical textiles in 2019

PRODCOM code	Description of the PRODCOM code	QNTUNIT	TYPE	Conversion Factor to kg
13941130	Twine, cordage, rope or cables, of sisal or other textile fibres of 'agave', of jute or other textile bast fibres and hard leaf fibres (excluding binder or baler twine)	kg	S	1
13941133	Twine, cordage, rope or cables, of sisal or other textile fibres of 'agave' measuring >100,000 decitex, of jute or other textile bast fibres and hard leaf fibres (excluding binder or baler twine)	NA	NA	NA
13941135	Twines of sisal measuring <= 100,000 decitex (10 g/m) (excluding binder or baler twine)	NA	NA	NA
13941153	Sisal binder or baler (agricultural) twines	kg	S	1
13941155	Polyethylene or polypropylene binder or baler (agricultural) twines	kg	S	1
13941160	Cordage, ropes or cables of polyethylene, polypropylene, nylon or other polyamides or of polyesters measuring > 50 000 decitex, of other synthetic fibres (excluding binder or baler twine)	kg	S	1
13941170	Twines of polyethylene or polypropylene, of nylon or other polyamides or polyesters measuring <= 50 000 decitex (5 g/m) (excluding binder or baler twine)	kg	S	1
13941190	Twines, cordage, rope and cables of textile materials (excluding jute and other textile bast fibres, sisal, abaca or other hard leaf fibres, synthetic fibres)	kg	S	1
13941233	Made-up fishing nets from twine, cordage or rope of man-made fibres (excluding fish landing nets)	kg	S	1
13941235	Made-up fishing nets from yarn of man-made fibres (excluding fish landing nets)	kg	S	1
13941253	Made-up nets from twine, cable or rope of nylon or other polyamides (excluding netting in the piece produced by crochet, hairnets, sports and fishing nets)	kg	S	1
13941255	Made-up nets of nylon or other polyamides (excluding netting in the piece produced by crochet, hairnets, sports and fishing nets, those made from twine, cable or rope)	kg	S	1
13941259	Knotted netting of textile materials (excluding made-up fishing nets of man-made textiles, other made-up nets of nylon or other polyamides)	kg	S	1
13941280	Articles of twine, cordage, rope or cables	kg	S	1
13951010	Non-wovens of a weight <= 25 g/m ² (including articles made from non-wovens) (excluding articles of apparel, coated or covered)	kg	S	1
13951020	Non-wovens of a weight of > 25 g/m ² but <= 70 g/m ² (including articles made from non-wovens) (excluding articles of apparel, coated or covered)	kg	S	1
13951030	Non-wovens of a weight of > 70 g/m ² but <= 150 g/m ² (including articles made from non-wovens) (excluding articles of apparel, coated or covered)	kg	S	1
13951050	Non-wovens of a weight of > 150 g/m ² (including articles made from non-wovens) (excluding articles of apparel, coated or covered)	kg	S	1
13951070	Non-wovens, coated or covered (including articles made from non-wovens) (excluding articles of apparel)	kg	S	1
13961100	Metallised yarn or metallised gimped yarn	kg	S	1
13961200	Woven fabrics of metal thread and woven fabrics of metallised yarn, used in apparel, as furnishing fabrics or similar purposes	kg	S	1
13961300	Rubber thread and cord, textile covered; textile yarn and strip impregnated, coated, covered or sheathed with rubber or plastics	kg	S	1
13961400	Textile fabrics, impregnated, coated or covered n.e.c.	m ²	S	0.25
13961500	Tyre cord fabrics of high tenacity yarn, of nylon, other polyamides, polyesters or viscose rayon	m ²	S	0.25
13961620	Textile hosepipe and similar textile tubing, whether or not impregnated or coated, with or without lining, armour or accessories of other materials	kg	S	1
13961650	Textile wicks, conveyor belts or belting (including reinforced with metal or other material)	kg	S	1
13961680	Textile fabrics and felts, for paper-making machines or similar machines (including for pulp or asbestos-cement)	kg	S	1
13961730	Narrow woven fabrics other than labels, badges and other similar articles	NA	S	NA
13961750	Labels, badges and similar articles in textile materials (excluding embroidered)	NA	S	NA

PRODCOM code	Description of the PRODCOM code	QNTUNIT	TYPE	Conversion Factor to kg
13961770	Braids in the piece; tassels and pompons, ornamental trimmings (excluding knitted or crocheted)	NA	S	NA
13991130	Tulles and other net fabrics (excluding woven, knitted or crocheted)	NA	S	NA
13991150	Machine-made lace in the piece, in strips or in motifs	NA	S	NA
13991170	Hand-made lace in the piece, in strips or in motifs	NA	S	NA
13991230	Embroidery (without visible ground) in the piece, in strips or in motifs	NA	S	NA
13991250	Cotton embroidery in the piece, in strips or in motifs (excluding embroidery without visible ground)	NA	S	NA
13991270	Embroidery of textiles in the piece, in strips or in motifs (excluding without visible ground, cotton)	NA	S	NA
13991300	Felt, whether or not impregnated, coated, covered or laminated, n.e.c.	kg	S	1
13991400	Textile flock and dust and mill neps	kg	S	1
13991500	Gimped yarn and gimped strip and the like, of man-made textile materials of an apparent width <= 5 mm; chenille yarn; loop wale-yarn	kg	S	1
13991600	Quilted textile products in the piece (excluding embroidery)	m ²	S	0.25
13991900	Powder-puffs and pads for the application of cosmetics or toilet preparations	p/st	S	0.5

5419 QNTUNIT: PRODCOM indicator about unit used to report quantities.

5420 kg = kilogram; p/st = number of items; NA = data not available, m²=square metres

5421 Source: own elaboration based on Eurostat data set DS-056120 (data extracted on 15 November 2023). Conversion factors used to convert the unit reported in EUROSTAT to kg based on (Huygens et al., 2023).

5422 10.1.4 PRODCOM codes included in the scope

5423 **Table 59.** List and description of PRODCOM codes included in the scope

Category	PRODCOM code	Description of the PRODCOM code	Allocation of the code in the product category (%)	Reported measure unit in PRODCOM	Conversion Factor to kg
1. T-shirts	14143000	T-shirts, singlets and vests, knitted or crocheted	100	p/st	0.17
	14142240	Men's or boys' singlets, vests, bathrobes, dressing gowns and similar articles (excluding knitted or crocheted)	75	p/st	0.3
	14142460	Women's or girls' singlets and other vests, briefs, panties, negligees, bathrobes, dressing gowns, housecoats and similar articles of cotton (excluding knitted or crocheted)	40	p/st	0.08
	14142480	Women's or girls' negligees, bathrobes, dressing gowns, singlets, vests, briefs and panties (including boxer shorts), of man-made fibres (excluding knitted or crocheted)	40	p/st	0.08
	14142489	Women's or girls' singlets, vests, briefs, panties, negligees, bathrobes, dressing gowns and similar articles, of textiles (excluding cotton, man-made fibres, knitted or crocheted)	40	p/st	0.08
	14123013	Men's or boys' other garments, of cotton or man-made fibres, for industrial or occupational wear	25	p/st	0.5
	14123023	Women's or girls' other garments, of cotton or man-made fibres, for industrial or occupational wear	25	p/st	0.5
	14391053	Lightweight fine knit roll, polo or turtle neck jumpers and pullovers, of cotton	20	p/st	0.5
	14142430	Women's or girls' nightdresses and pyjamas (excluding knitted or crocheted)	25	p/st	0.3
	14142230	Men's or boys' nightshirts and pyjamas (excluding knitted or crocheted)	25	p/st	0.15
	14141430	Women's or girls' nighties and pyjamas, of knitted or crocheted textiles	25	p/st	0.15

Category	PRODCOM code	Description of the PRODCOM code	Allocation of the code in the product category (%)	Reported measure unit in PRODCOM	Conversion Factor to kg
	14391055	Lightweight fine knit roll, polo or turtle neck jumpers and pullovers, of man-made fibres	20	p/st	0.5
	14141230	Men's or boys' nightshirts and pyjamas, of knitted or crocheted textiles	25	p/st	0.15
	14191290	Other garments, knitted or crocheted (including bodies with a proper sleeve)	100	kg	1
2. Shirts and blouses	14141100	Men's or boys' shirts, knitted or crocheted	100	p/st	0.25
	14141310	Women's or girls' blouses, shirts and shirt-blouses, of knitted or crocheted textiles	100	p/st	0.25
	14142100	Men's or boys' shirts (excluding knitted or crocheted)	100	p/st	0.25
	14142300	Women's or girls' blouses, shirts and shirt-blouses (excluding knitted or crocheted)	100	p/st	0.25
	14123013	Men's or boys' other garments, of cotton or man-made fibres, for industrial or occupational wear	25	p/st	0.5
	14123023	Women's or girls' other garments, of cotton or man-made fibres, for industrial or occupational wear	25	p/st	0.5
	14141230	Men's or boys' nightshirts and pyjamas, of knitted or crocheted textiles	25	p/st	0.15
	14142430	Women's or girls' nightdresses and pyjamas (excluding knitted or crocheted)	25	p/st	0.3
	14142230	Men's or boys' nightshirts and pyjamas (excluding knitted or crocheted)	25	p/st	0.15
	14141430	Women's or girls' nighties and pyjamas, of knitted or crocheted textiles	25	p/st	0.15
	14391053	Lightweight fine knit roll, polo or turtle neck jumpers and pullovers, of cotton	40	p/st	0.5
14391055	Lightweight fine knit roll, polo or turtle neck jumpers and pullovers, of man-made fibres	40	p/st	0.5	
3. Sweaters and mid-layers	14391031	Men's or boys' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of wool or fine animal hair (excluding jerseys and pullovers containing >= 50 % of wool and weighing >= 600 g)	100	p/st	0.5
	14391032	Women's or girls' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of wool or fine animal hair (excluding jerseys and pullovers containing >= 50 % of wool and weighing >= 600 g)	100	p/st	0.5
	14391033	Jerseys and pullovers, containing >= 50 % by weight of wool and weighing >= 600 g per article	100	p/st	0.3
	14391053	Lightweight fine knit roll, polo or turtle neck jumpers and pullovers, of cotton	40	p/st	0.5
	14391055	Lightweight fine knit roll, polo or turtle neck jumpers and pullovers, of man-made fibres	40	p/st	0.5
	14391061	Men's or boys' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of cotton (excluding lightweight fine knit roll, polo or turtle neck jumpers and pullovers)	100	p/st	0.5
	14391062	Women's or girls' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of cotton (excluding lightweight fine knit roll, polo or turtle neck jumpers and pullovers)	100	p/st	0.5
	14132130	Men's or boys' waistcoats, anoraks, ski-jackets, wind-jackets and similar articles (excluding jackets and blazers, knitted or crocheted, impregnated, coated, covered, laminated or rubberised)	20	p/st	0.95
	14133130	Women's or girls' waistcoats, anoraks, ski-jackets, wind-jackets and similar articles (excluding jackets and blazers, knitted or crocheted, impregnated, coated, covered, laminated or rubberised)	20	p/st	0.95
	14391071	Men's or boys' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of man-made fibres (excluding lightweight fine knit roll, polo or turtle neck jumpers and pullovers)	100	p/st	0.5
14391072	Women's or girls' jerseys, pullovers, sweatshirts, waistcoats and cardigans, of man-made fibres (excluding lightweight fine knit roll, polo or turtle neck jumpers and pullovers)	100	p/st	0.5	

Category	PRODCOM code	Description of the PRODCOM code	Allocation of the code in the product category (%)	Reported measure unit in PRODCOM	Conversion Factor to kg
	14391090	Jerseys, pullovers, sweatshirts, waistcoats and cardigans, of textile materials (excluding those of wool or fine animal hair, cotton, man-made fibres)	100	p/st	0.5
	14131120	Men's or boys' waistcoats, anoraks, ski-jackets, wind-cheaters, wind-jackets and similar articles, of knitted or crocheted textiles (excluding jackets and blazers)	20	p/st	0.95
	14131320	Women's or girls' waistcoats, anoraks, ski-jackets, wind-cheaters, wind-jackets and similar articles, of knitted or crocheted textiles (excluding jackets and blazers)	20	p/st	0.95
4. Jackets and coats	14121130	Men's or boys' jackets and blazers, of cotton or man-made fibres, for industrial and occupational wear	100	p/st	0.95
	14122130	Women's or girls' jackets and blazers, of cotton or man-made fibres, for industrial or occupational wear	100	p/st	0.95
	14131110	Men's or boys' overcoats, car-coats, capes, cloaks and similar articles, of knitted or crocheted textiles (excluding jackets and blazers, anoraks, wind-cheaters and wind-jackets)	100	p/st	0.95
	14131120	Men's or boys' waistcoats, anoraks, ski-jackets, wind-cheaters, wind-jackets and similar articles, of knitted or crocheted textiles (excluding jackets and blazers)	80	p/st	0.95
	14131230	Men's or boys' jackets and blazers, of knitted or crocheted textiles	100	p/st	0.95
	14131310	Women's or girls' overcoats, car-coats, capes, cloaks and similar articles, of knitted or crocheted textiles (excluding jackets and blazers)	100	p/st	0.95
	14131320	Women's or girls' waistcoats, anoraks, ski-jackets, wind-cheaters, wind-jackets and similar articles, of knitted or crocheted textiles (excluding jackets and blazers)	80	p/st	0.95
	14131430	Women's or girls' jackets and blazers, of knitted or crocheted textiles	100	p/st	0.95
	14132115	Men's or boys' raincoats, overcoats, car-coats, capes, etc.	100	p/st	0.5
	14132130	Men's or boys' waistcoats, anoraks, ski-jackets, wind-jackets and similar articles (excluding jackets and blazers, knitted or crocheted, impregnated, coated, covered, laminated or rubberised)	80	p/st	0.95
	14132300	Men's or boys' jackets and blazers (excluding knitted or crocheted)	100	p/st	0.95
	14133110	Woman's or girls' raincoats	100	p/st	0.5
	14133115	Woman's or girls' raincoats and overcoats, etc.	100	p/st	0.5
	14133120	Woman's or girls' overcoats, etc.	100	p/st	0.95
	14133130	Women's or girls' waistcoats, anoraks, ski-jackets, wind-jackets and similar articles (excluding jackets and blazers, knitted or crocheted, impregnated, coated, covered, laminated or rubberised)	80	p/st	0.95
	14133330	Women's or girls' jackets and blazers (excluding knitted or crocheted)	100	p/st	0.95
	14192230	Ski-suits (excluding of knitted or crocheted textiles)	50	p/st	0.5
	14191230	Ski-suits, of knitted or crocheted textiles	50	p/st	0.5
	14191100	Babies' garments and clothing accessories, knitted or crocheted including vests, rompers, underpants, stretch-suits, gloves or mittens or mitts, outerwear (for children of height <= 86 cm)	20	kg	1
	14192150	Babies clothing and accessories, of textiles, not knitted or crocheted (for children of height <= 86 cm) including vests, rompers, underpants, stretch-suits, gloves, mittens and outerwear (excluding sanitary towels and napkins and similar articles)	20	kg	1
14131260	Men's or boys' suits and ensembles, of knitted or crocheted textiles	40	p/st	0.5	

Category	PRODCOM code	Description of the PRODCOM code	Allocation of the code in the product category (%)	Reported measure unit in PRODCOM	Conversion Factor to kg
	14131460	Women's or girls' suits and ensembles, of knitted or crocheted textiles	40	p/st	0.5
	14132200	Men's or boys' suits & ensembles (excluding knitted or crocheted)	40	p/st	0.5
	14133200	Women's or girls' suits & ensembles (excluding knitted or crocheted)	40	p/st	0.5
	14132110	Men's or boys' raincoats	100	p/st	0.5
	14132120	Men's or boys' overcoats, car-coats, capes, etc.	100	p/st	0.95
	14132210	Men's or boys' suits (excluding knitted or crocheted)	50	p/st	1.4
	14132220	Men's or boys' ensembles (excluding knitted or crocheted)	50	p/st	1
	14133210	Women's or girls' suits (excluding knitted or crocheted)	50	p/st	1.4
	14133220	Women's or girls' ensembles (excluding knitted or crocheted)	50	p/st	1
	14192100	Babies' clothing and accessories, of textiles, not knitted or crocheted (for children of height <= 86 cm) including vests, rompers, underpants, stretch-suits, napkins, gloves, mittens and outerwear	20	kg	1
5. Pants and shorts	14131270	Men's or boys' trousers, breeches, shorts, bib and brace overalls, of knitted or crocheted textiles	100	p/st	0.45
	14131490	Women's or girls' trousers, breeches, shorts, bib and brace overalls, of knitted or crocheted textiles	100	p/st	0.45
	14132442	Men's or boys' trousers and breeches, of denim (excluding for industrial or occupational wear)	100	p/st	0.45
	14132444	Men's or boys' trousers, breeches and shorts, of wool or fine animal hair (excluding knitted or crocheted, for industrial or occupational wear)	100	p/st	0.45
	14132445	Men's or boys' trousers and breeches, of man-made fibres (excluding knitted or crocheted, for industrial or occupational wear)	100	p/st	0.45
	14132448	Men's or boys' trousers and breeches, of cotton (excluding denim, knitted or crocheted)	100	p/st	0.45
	14132449	Men's or boys' trousers, breeches, shorts and bib and brace overalls (excluding of wool, cotton and man-made fibres, knitted or crocheted)	100	p/st	0.45
	14141230	Men's or boys' nightshirts and pyjamas, of knitted or crocheted textiles	50	p/st	0.15
	14132455	Men's or boys' bib and brace overalls (excluding knitted or crocheted, for industrial or occupational wear)	100	p/st	0.45
	14132460	Men's or boys' shorts, of cotton or man-made fibres (excluding knitted or crocheted)	100	p/st	0.45
	14133542	Women's or girls' trousers and breeches, of denim (excluding for industrial or occupational wear)	100	p/st	0.45
	14133548	Women's or girls' trousers and breeches, of cotton (excluding denim, for industrial or occupational wear)	100	p/st	0.45
	14133549	Women's or girls' trousers and breeches, of wool or fine animal hair or man-made fibres (excluding knitted or crocheted and for industrial and occupational wear)	100	p/st	0.45
	14133551	Women's or girls' bib and brace overalls, of cotton (excluding knitted or crocheted, for industrial or occupational wear)	100	p/st	0.45
	14142430	Women's or girls' nightdresses and pyjamas (excluding knitted or crocheted)	30	p/st	0.3
14133561	Women's or girls' shorts, of cotton (excluding knitted and crocheted)	100	p/st	0.45	

Category	PRODCOM code	Description of the PRODCOM code	Allocation of the code in the product category (%)	Reported measure unit in PRODCOM	Conversion Factor to kg
	14133563	Women's or girls' bib and brace overalls, of wool or fine animal hair and man-made fibres (excluding cotton, knitted or crocheted, for industrial or occupational wear) and women's or girls' shorts, of wool or fine animal hair (excluding knitted or crocheted)	100	p/st	0.45
	14133565	Women's or girls' shorts, of man-made fibres (excluding knitted or crocheted)	100	p/st	0.45
	14133569	Women's or girls' trousers, breeches, bib and brace overalls, of textiles (excluding cotton, wool or fine animal hair, man-made fibres, knitted or crocheted)	100	p/st	0.45
	14121240	Men's or boys' trousers and breeches, of cotton or man-made fibres, for industrial or occupational wear	100	p/st	0.45
	14121250	Men's or boys' bib and brace overalls, of cotton or man-made fibres, for industrial or occupational wear	100	p/st	0.45
	14122240	Women's or girls' trousers and breeches, of cotton or man-made fibres, for industrial or occupational wear	100	p/st	0.45
	14141430	Women's or girls' nighties and pyjamas, of knitted or crocheted textiles	30	p/st	0.15
	14142230	Men's or boys' nightshirts and pyjamas (excluding knitted or crocheted)	50	p/st	0.15
	14122250	Women's or girls' bib and brace overalls, of cotton or man-made fibres, for industrial or occupational wear	100	p/st	0.45
	14192230	Ski-suits (excluding of knitted or crocheted textiles)	50	p/st	0.5
	14191230	Ski-suits, of knitted or crocheted textiles	50	p/st	0.5
	14131260	Men's or boys' suits and ensembles, of knitted or crocheted textiles	40	p/st	0.5
	14131460	Women's or girls' suits and ensembles, of knitted or crocheted textiles	40	p/st	0.5
	14132200	Men's or boys' suits & ensembles (excluding knitted or crocheted)	40	p/st	0.5
	14133200	Women's or girls' suits & ensembles (excluding knitted or crocheted)	40	p/st	0.5
	14123013	Men's or boys' other garments, of cotton or man-made fibres, for industrial or occupational wear	50	p/st	0.5
	14123023	Women's or girls' other garments, of cotton or man-made fibres, for industrial or occupational wear	50	p/st	0.5
	14132210	Men's or boys' suits (excluding knitted or crocheted)	50	p/st	1
	14132220	Men's or boys' ensembles (excluding knitted or crocheted)	50	p/st	1
	14133210	Women's or girls' suits (excluding knitted or crocheted)	25	p/st	1
	14133220	Women's or girls' ensembles (excluding knitted or crocheted)	25	p/st	1
6. Dresses, Skirts and jumpsuits	14131470	Women's or girls' dresses, of knitted or crocheted textiles	100	p/st	0.3
	14131480	Women's or girls' skirts and divided skirts, of knitted or crocheted textiles	100	p/st	0.25
	14133470	Women's or girls' dresses (excluding knitted or crocheted)	100	p/st	0.3
	14133480	Women's or girls' skirts and divided skirts (excluding knitted or crocheted)	100	p/st	0.25
	14131260	Men's or boys' suits and ensembles, of knitted or crocheted textiles	20	p/st	0.5
	14121120	Men's or boys' ensembles, of cotton or man-made fibres, for industrial and occupational wear	100	p/st	0.5
	14191210	Track-suits, of knitted or crocheted textiles	100	p/st	0.5
	14141430	Women's or girls' nighties and pyjamas, of knitted or crocheted textiles	20	p/st	0.15
	14132200	Men's or boys' suits & ensembles (excluding knitted or crocheted)	20	p/st	0.5

Category	PRODCOM code	Description of the PRODCOM code	Allocation of the code in the product category (%)	Reported measure unit in PRODCOM	Conversion Factor to kg
	14142489	Women's or girls' singlets, vests, briefs, panties, negligees, bathrobes, dressing gowns and similar articles, of textiles (excluding cotton, man-made fibres, knitted or crocheted)	30	p/st	0.08
	14142450	Women's or girls' slips and petticoats (excluding knitted or crocheted)	100	p/st	0.5
	14142480	Women's or girls' negligees, bathrobes, dressing gowns, singlets, vests, briefs and panties (including boxer shorts), of man-made fibres (excluding knitted or crocheted)	30	p/st	0.08
	14142430	Women's or girls' nightdresses and pyjamas (excluding knitted or crocheted)	20	p/st	0.3
	14142240	Men's or boys' singlets, vests, bathrobes, dressing gowns and similar articles (excluding knitted or crocheted)	25	p/st	0.3
	14141440	Women's or girls' negligees, bathrobes, dressing gowns and similar articles, of knitted or crocheted textiles	100	p/st	0.3
	14141450	Women's or girls' slips and petticoats, of knitted or crocheted textiles	100	p/st	0.5
	14141240	Men's or boys' dressing gowns, bathrobes and similar articles, of knitted or crocheted textiles	100	p/st	0.3
	14192210	Other men's or boys' apparel n.e.c., including tracksuits and jogging suits (excluding waistcoats, ski-suits, knitted or crocheted)	100	p/st	0.5
	14192220	Other women's or girls' apparel n.e.c., including tracksuits and jogging suits (excluding waistcoats, ski-suits, knitted or crocheted)	100	p/st	0.5
	14122120	Women's or girls' ensembles, of cotton or man-made fibres, for industrial or occupational wear	100	p/st	0.5
	14131460	Women's or girls' suits and ensembles, of knitted or crocheted textiles	20	p/st	0.5
	14133200	Women's or girls' suits & ensembles (excluding knitted or crocheted)	20	p/st	0.5
	14142460	Women's or girls' singlets and other vests, briefs, panties, negligees, bathrobes, dressing gowns, housecoats and similar articles of cotton (excluding knitted or crocheted)	30	p/st	0.08
	14133210	Women's or girls' suits (excluding knitted or crocheted)	25	p/st	1
	14133220	Women's or girls' ensembles (excluding knitted or crocheted)	25	p/st	1
7. Leggings, Stockings, Tights and socks	14311033	Panty hose and tights, of knitted or crocheted synthetic fibres, measuring per single yarn < 67 decitex	100	p/st	0.07
	14311035	Panty hose and tights, of knitted or crocheted synthetic fibres, measuring per single yarn >= 67 decitex	100	p/st	0.07
	14311037	Pantyhose and tights of textile materials, knitted or crocheted (excl. graduated compression hosiery, those of synthetic fibres and hosiery for babies)	100	p/st	0.07
	14311050	Women's full-length or knee-length knitted or crocheted hosiery, measuring per single yarn < 67 decitex	100	pa	0.01
	14311090	Knitted or crocheted hosiery and footwear (including socks; excluding women's full-length/knee-length hosiery, measuring <67decitex, panty-hose and tights, footwear with applied soles)	95	pa	0.07
8. Underwear	14141220	Men's or boys' underpants and briefs, of knitted or crocheted textiles (including boxer shorts)	100	p/st	0.08
	14141420	Women's or girls' briefs and panties, of knitted or crocheted textiles (including boxer shorts)	100	p/st	0.08
	14142220	Men's or boys' underpants and briefs (including boxer shorts) (excluding knitted or crocheted)	100	p/st	0.08

Category	PRODCOM code	Description of the PRODCOM code	Allocation of the code in the product category (%)	Reported measure unit in PRODCOM	Conversion Factor to kg
	14142530	Brassieres	100	p/st	0.05
	14142550	Girdles, panty-girdles and corselettes (including bodies with adjustable straps)	100	p/st	0.5
	14191100	Babies' garments and clothing accessories, knitted or crocheted including vests, rompers, underpants, stretch-suits, gloves or mittens or mitts, outerwear (for children of height <= 86 cm)	50	kg	1
	14192150	Babies clothing and accessories, of textiles, not knitted or crocheted (for children of height <= 86 cm) including vests, rompers, underpants, stretch-suits, gloves, mittens and outerwear (excluding sanitary towels and napkins and similar articles)	50	kg	1
	14142460	Women's or girls' singlets and other vests, briefs, panties, negligees, bathrobes, dressing gowns, housecoats and similar articles of cotton (excluding knitted or crocheted)	30	p/st	0.08
	14142480	Women's or girls' negligees, bathrobes, dressing gowns, singlets, vests, briefs and panties (including boxer shorts), of man-made fibres (excluding knitted or crocheted)	30	p/st	0.08
	14142489	Women's or girls' singlets, vests, briefs, panties, negligees, bathrobes, dressing gowns and similar articles, of textiles (excluding cotton, man-made fibres, knitted or crocheted)	30	p/st	0.08
	14192100	Babies' clothing and accessories, of textiles, not knitted or crocheted (for children of height <= 86 cm) including vests, rompers, underpants, stretch-suits, napkins, gloves, mittens and outerwear	50	kg	1
9. Swimwear	14191240	Men's or boys' swimwear, of knitted or crocheted textiles	100	p/st	0.12
	14191250	Women's or girls' swimwear, of knitted or crocheted textiles	100	p/st	0.12
	14192240	Men's or boys' swimwear (excluding of knitted or crocheted textiles)	100	p/st	0.12
	14192250	Women's or girls' swimwear (excluding of knitted or crocheted textiles)	100	p/st	0.12
10. Accessories	14191300	Gloves, mittens and mitts, of knitted or crocheted textiles	100	pa	0.1
	14191930	Shawls, scarves, mufflers, mantillas, veils and the like, of knitted or crocheted textiles	100	p/st	0.1
	14191960	Clothing accessories and parts thereof, of knitted or crocheted textiles (excluding gloves, mittens, shawls, scarves, mufflers, mantillas and veils)	100	p/st	1
	14192310	Handkerchiefs	100	p/st	0.5
	14192333	Shawls, scarves, mufflers, mantillas, veils and the like (excluding articles of silk or silk waste, knitted or crocheted)	100	p/st	0.15
	14192338	Shawls, scarves, mufflers, mantillas, veils and the like, of silk or silk waste (excluding knitted or crocheted)	100	p/st	0.15
	14192353	Ties, bow ties and cravats (excluding articles of silk or silk waste, knitted or crocheted)	100	p/st	0.15
	14192358	Ties, bow ties and cravats, of silk or silk waste (excluding knitted or crocheted)	100	p/st	0.15
	14192370	Gloves, mittens and mitts (excluding knitted or crocheted)	100	pa	0.1
	14192393	Clothing accessories of textiles (excluding shawls, scarves and mufflers, mantillas and veils, ties, bow-ties and cravats, gloves, mittens and mitts, knitted or crocheted)	100	NA	1
	14192395	Parts of garments or of clothing accessories, of textiles (excluding bras, girdles and corsets, braces, suspenders and garters, knitted or crocheted)	100	NA	1
	14192396	Clothing accessories, parts of garments or of clothing accessories, of textiles, n.e.c. and parts thereof, (excluding shawls, scarves and mufflers, mantillas and veils, ties, bow-ties and cravats, gloves, mittens and mitts and parts thereof; bras, girdles and corsets, braces, suspenders and garters, knitted or crocheted)	100	NA	1

Category	PRODCOM code	Description of the PRODCOM code	Allocation of the code in the product category (%)	Reported measure unit in PRODCOM	Conversion Factor to kg
	14194130	Hat-forms, hat bodies and hoods, plateaux and manchons of felt (including slit manchons) (excluding those blocked to shape, those with made brims)	100	p/st	0.1
	14194150	Hat-shapes, plaited or made by assembling strips of any material (excluding those blocked to shape, those with made brims, those lined or trimmed)	100	p/st	0.1
	14194230	Felt hats and other felt headgear, made from hat bodies or hoods and plateaux	100	p/st	0.1
	14194250	Hats and other headgear, plaited or made by assembling strips of any material	100	p/st	0.1
	14194270	Hats and other headgear, knitted or crocheted or made-up from lace, felt or other textile fabric in the piece (but not in strips); hair-nets of any material	100	p/st	0.1

5424 kg=kilogram, p/st= Number of items, pa=Number of pairs, NA= Not available

5425 Some codes were assigned to more than one product category with different allocation percentage. This allocation was an estimation of the authors based on the description of the PRODCOM code.

5426 Source: own elaboration based on Eurostat data set DS-056120 (data extracted on 15 November 2023). Conversion factors used to convert the unit reported in EUROSTAT to kg based on (Huygens, Dries et al., 2023).

5427 **Table 60.** Characteristics of data used for the market analysis

PRODCOM codes affected by changes	Subgroup	Product category ID and name (share of the code allocated to the category)	Codes description	Implications of the affected codes (rationale) over the existing codes (merging, newly introduced, complementing, etc.)	Affected indicator	Missing data
14123013	Apparel	1.T-shirts (25%) 2.Shirts and blouses (25%) 5.Pants and shorts (50%)	Men's or boys' other garments, of cotton or man-made fibres, for industrial or occupational wear	The 2 affected codes were added in 2001 to complement the codes about industrial and occupational wear: 14121120 14121130 14121240 14121250 14122120 14122130 14122240 14122250	PRODQNT EXPQNT IMPQNT PRODVAL EXPVAL IMPVAL	NA
14123023	Apparel	1.T-shirts (25%) 2.Shirts and blouses (25%) 5.Pants and shorts (25%)	Women's or girls' other garments, of cotton or man-made fibres, for industrial or occupational wear			NA
14131260	Apparel	4.Jackets and coats (40%) 5.Pants and shorts (40%) 6.Dresses, Skirts and jumpsuits (20%)	Men's or boys' suits and ensembles, of knitted or crocheted textiles	The 4 affected codes were added in 2001 to complement the codes about knitted and crocheted textiles groups: 14131110 14131120 14131230 14131310 14131320	PRODQNT EXPQNT IMPQNT PRODVAL EXPVAL IMPVAL	NA
14131270	Apparel	5.Pants and shorts (100%)	Men's or boys' trousers, breeches, shorts, bib and brace overalls, of knitted or crocheted textiles			NA

PRODCOM codes affected by changes	Subgroup	Product category ID and name (share of the code allocated to the category)	Codes description	Implications of the affected codes (rationale) over the existing codes (merging, newly introduced, complementing, etc.)	Affected indicator	Missing data
14131460	Apparel	4.Jackets and coats (40%) 5.Pants and shorts (40%) 6.Dresses, Skirts and jumpsuits (20%)	Women's or girls' suits and ensembles, of knitted or crocheted textiles	14131430 14131470 14131480)		NA
14131490	Apparel	5.Pants and shorts (100%)	Women's or girls' trousers, breeches, shorts, bib and brace overalls, of knitted or crocheted textiles			NA
14132115	Apparel	4.Jackets and coats (100%)	Men's or boys' raincoats, overcoats, car-coats, capes, etc.	The affected code was added in 2013, merging the following 2 codes: 14132110 14132120	PRODQNT EXPQNT IMPQNT PRODVAL EXPVAL IMPVAL	Data missing for 2022 due to updates of the PRODCOM list.
14132200	Apparel	4.Jackets and coats (40%) 5.Pants and shorts (40%) 6.Dresses, Skirts and jumpsuits (20%)	Men's or boys' suits & ensembles (excluding knitted or crocheted)	The affected code was added in 2013, merging the following 2 codes: 14132210 14132220	PRODQNT EXPQNT IMPQNT PRODVAL EXPVAL IMPVAL	Data missing for 2022.
14132445	Apparel	5.Pants and shorts (100%)	Men's or boys' trousers and breeches, of man-made fibres (excluding knitted or crocheted, for industrial or occupational wear)	The 3 affected codes start in 2001 as to complement the Men's or boys' trousers, breeches, shorts, bib and brace overalls groups divided into specific fibres excluding knitted and crocheted which are complete codes): 14132442 14132444 14132448 14132449 14132460	PRODQNT EXPQNT IMPQNT PRODVAL EXPVAL IMPVAL	Data missing for time interval 1995-2001 most probably due to introduction of new codes.
14132455	Apparel	5.Pants and shorts (100%)	Men's or boys' bib and brace overalls (excluding knitted or crocheted, for industrial or occupational wear)			Data missing for time interval 1995-2001 most probably due to introduction of new codes.
14131270	Apparel	5.Pants and shorts (100%)	Men's or boys' trousers, breeches, shorts, bib and brace overalls, of knitted or crocheted textiles			Data missing for time interval 1995-2001 most probably due to introduction of new codes.

PRODCOM codes affected by changes	Subgroup	Product category ID and name (share of the code allocated to the category)	Codes description	Implications of the affected codes (rationale) over the existing codes (merging, newly introduced, complementing, etc.)	Affected indicator	Missing data
14133115	Apparel	4.Jackets and coats (100%)	Woman's or girls' raincoats and overcoats, etc.	The affected code was added in 2012, merging the 2 following codes: 14133110 14133120	PRODQNT EXPQNT IMPQNT PRODVAL EXPVAL IMPVAL	Data missing for 2022 due to updates of the PRODCOM list
14133130	Apparel	3.Sweaters and mid-layers (20%) 4.Jackets and coats (80%)	Women's or girls' waistcoats, anoraks, ski-jackets, wind-jackets and similar articles (excluding jackets and blazers, knitted or crocheted, impregnated, coated, covered, laminated or rubberised)	NA	PRODQNT EXPQNT IMPQNT PRODVAL EXPVAL IMPVAL	Data missing for 2022 due to updates of the PRODCOM list
14133200	Apparel	4.Jackets and coats (40%) 5.Pants and shorts (40%) 6.Dresses, Skirts and jumpsuits (20%)	Women's or girls' suits & ensembles (excluding knitted or crocheted)	The affected code was added in 2012, merging the following 2 codes: 14133210 14133220	PRODQNT EXPQNT IMPQNT PRODVAL EXPVAL IMPVAL	NA
14133565	Apparel	5.Pants and shorts (100%)	Women's or girls' shorts, of man-made fibres (excluding knitted or crocheted)	The affected code was added in 2001 as to complement the Women's or girls' shorts groups divided into specific fibres (excluding knitted and crocheted which are complete codes): 14133551 14133561 14133563	PRODQNT EXPQNT IMPQNT PRODVAL EXPVAL IMPVAL	Data missing for time interval 1995-2001 most probably due to introduction of new codes.
14192150	Apparel	4.Jackets and coats (20%) 8.Underwear (50%)	Babies clothing and accessories, of textiles, not knitted or crocheted (for children of height <= 86 cm) including vests, rompers, underpants, stretch-suits, gloves, mittens and outerwear (excluding sanitary towels and napkins and similar articles)	The affected code was added in 2012 to complement Babies clothing and accessories: 14192100	PRODVAL EXPVAL IMPVAL	NA

PRODCOM codes affected by changes	Subgroup	Product category ID and name (share of the code allocated to the category)	Codes description	Implications of the affected codes (rationale) over the existing codes (merging, newly introduced, complementing, etc.)	Affected indicator	Missing data
14192100	Apparel	4.Jackets and coats (20%) 8.Underwear (50%)	Babies' clothing and accessories, of textiles, not knitted or crocheted (for children of height <= 86 cm) including vests, rompers, underpants, stretch-suits, napkins, gloves, mittens and outerwear	NA	PRODVAL EXPVAL IMPVAL	Data missing for 2022
14191100	Apparel	4.Jackets and coats (20%) 8.Underwear (50%)	Babies' garments and clothing accessories, knitted or crocheted including vests, rompers, underpants, stretch-suits, gloves or mittens or mitts, outerwear (for children of height <= 86 cm)	NA	NA	PRODQNT EXPQNT
14142240	Apparel	1.T-shirts (75%) 6.Dresses, Skirts and jumpsuits (25%)	Men's or boys' singlets, vests, bathrobes, dressing gowns and similar articles (excluding knitted or crocheted)	NA	NA	EXPQNT IMPQNT
14142460	Apparel	1.T-shirts (40%) 6.Dresses, Skirts and jumpsuits (30%) 8.Underwear (30%)	Women's or girls' singlets and other vests, briefs, panties, negligees, bathrobes, dressing gowns, housecoats and similar articles of cotton (excluding knitted or crocheted)	NA	NA	EXPQNT IMPQNT
14142480	Apparel	1.T-shirts (40%) 6.Dresses, Skirts and jumpsuits (30%) 8.Underwear (30%)	Women's or girls' negligees, bathrobes, dressing gowns, singlets, vests, briefs and panties (including boxer shorts), of man-made fibres (excluding knitted or crocheted)	NA	NA	EXPQNT
14142489	Apparel	1.T-shirts (40%) 6.Dresses, Skirts and jumpsuits (30%) 8.Underwear (30%)	Women's or girls' singlets, vests, briefs, panties, negligees, bathrobes, dressing gowns and similar articles, of textiles (excluding cotton, man-made fibres, knitted or crocheted)	NA	NA	IMPQNT
14191230	Apparel	4.Jackets and coats (50%) 5.Pants and shorts (50%)	Ski-suits, of knitted or crocheted textiles	NA	NA	EXPQNT

PRODCOM codes affected by changes	Subgroup	Product category ID and name (share of the code allocated to the category)	Codes description	Implications of the affected codes (rationale) over the existing codes (merging, newly introduced, complementing, etc.)	Affected indicator	Missing data
14192150	Apparel	4.Jackets and coats (50%) 5.Pants and shorts (50%)	Babies clothing and accessories, of textiles, not knitted or crocheted (for children of height <= 86 cm) including vests, rompers, underpants, stretch-suits, gloves, mittens and outerwear (excluding sanitary towels and napkins and similar articles)	NA	NA	EXPQNT IMPQNT PRODQNT
14192210	Apparel	6.Dresses, Skirts and jumpsuits (100%)	Other men's or boys' apparel n.e.c., including tracksuits and jogging suits (excluding waistcoats, ski-suits, knitted or crocheted)	NA	NA	EXPQNT IMPQNT
14192220	Apparel	6.Dresses, Skirts and jumpsuits (100%)	Other women's or girls' apparel n.e.c., including tracksuits and jogging suits (excluding waistcoats, ski-suits, knitted or crocheted)	NA	NA	EXPQNT
14311037	Apparel	7.Leggings, Stockings, Tights and socks (100%)	Pantyhose and tights of textile materials, knitted or crocheted (excl. graduated compression hosiery, those of synthetic fibres and hosiery for babies)	Code included in 2013 complement Hosiery: 14311090	PRODVAL EXPVAL IMPVAL	NA
14192396	Apparel	10. Accessories	Clothing accessories, parts of garments or of clothing accessories, of textiles, n.e.c. and parts thereof, (excluding shawls, scarves and mufflers, mantillas and veils, ties, bow-ties and cravats, gloves, mittens and mitts and parts thereof; bras, girdles and corsets, braces, suspenders and garters, knitted or crocheted)	Code included in 2015 to complement accessories: 14192393 14192395	PRODVAL EXPVAL IMPVAL	PRODQNT IMPQNT EXPQNT
14192393	Apparel	10. Accessories	Clothing accessories of textiles (excluding shawls, scarves and mufflers, mantillas and veils, ties, bow-ties and cravats, gloves, mittens and mitts, knitted or crocheted)	NA	NA	PRODQNT IMPQNT EXPQNT

PRODCOM codes affected by changes	Subgroup	Product category ID and name (share of the code allocated to the category)	Codes description	Implications of the affected codes (rationale) over the existing codes (merging, newly introduced, complementing, etc.)	Affected indicator	Missing data
14192395	Apparel	10. Accessories	Parts of garments or of clothing accessories, of textiles (excluding bras, girdles and corsets, braces, suspenders and garters, knitted or crocheted)	NA	NA	PRODQNT IMPQNT EXPQNT
14194270	Apparel	10. Accessories	Hats and other headgear, knitted or crocheted or made-up from lace, felt or other textile fabric in the piece (but not in strips); hair-nets of any material	NA	NA	IMPQNT EXPQNT
14191930	Apparel	10. Accessories	Shawls, scarves, mufflers, mantillas, veils and the like, of knitted or crocheted textiles	NA	NA	EXPQNT
14191960	Apparel	10. Accessories	Clothing accessories and parts thereof, of knitted or crocheted textiles (excluding gloves, mittens, shawls, scarves, mufflers, mantillas and veils)	NA	NA	EXPQNT

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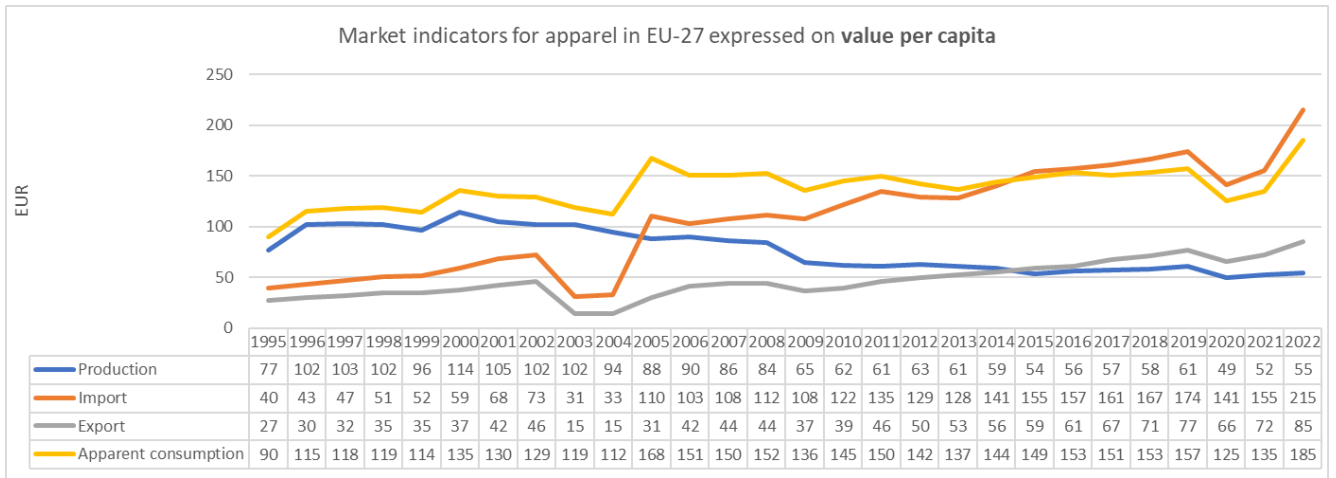
5430

NA: not applicable

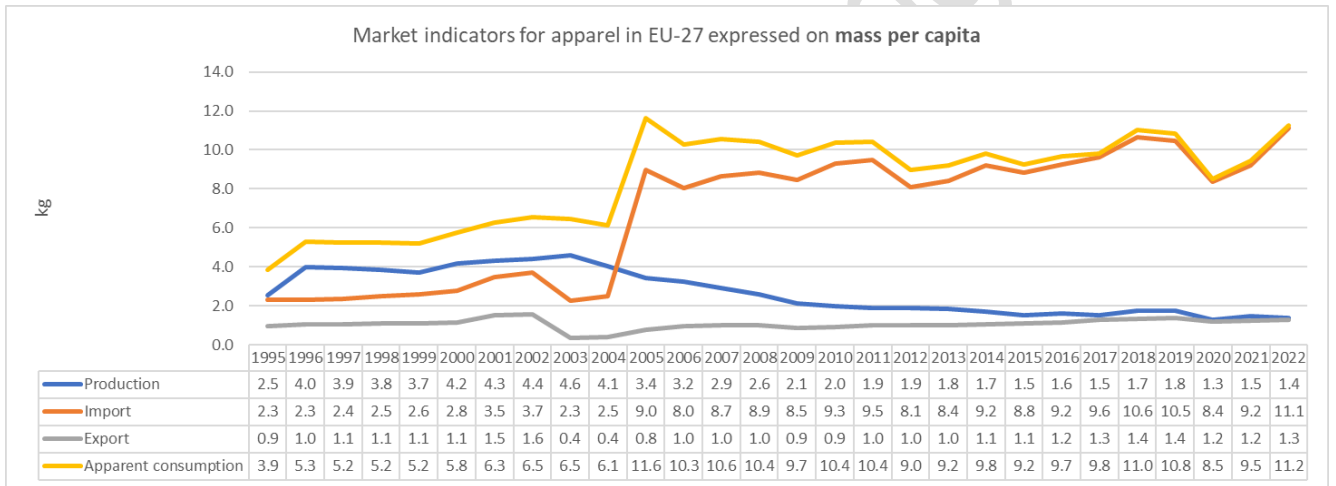
The changes of the affected PRODCOM codes should be understood as merged, changed or newly introduced due to NACE list revision and they are considered complete in the analysis and used.

5431 **10.1.5 Supplementary information about the EU market**

5432 **Figure 29.** Market indicators per capita for textile apparel in EU-27



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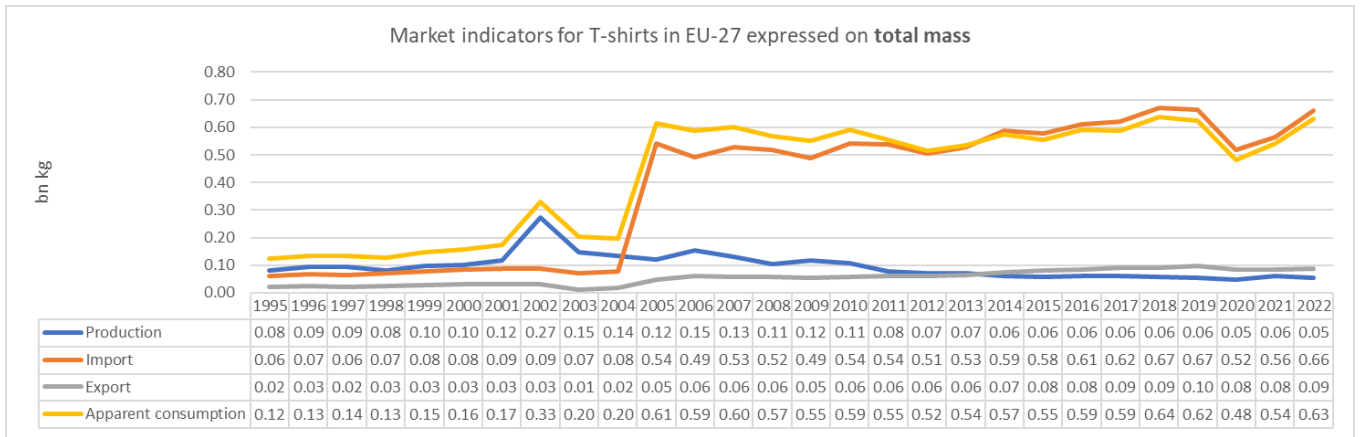
5435

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

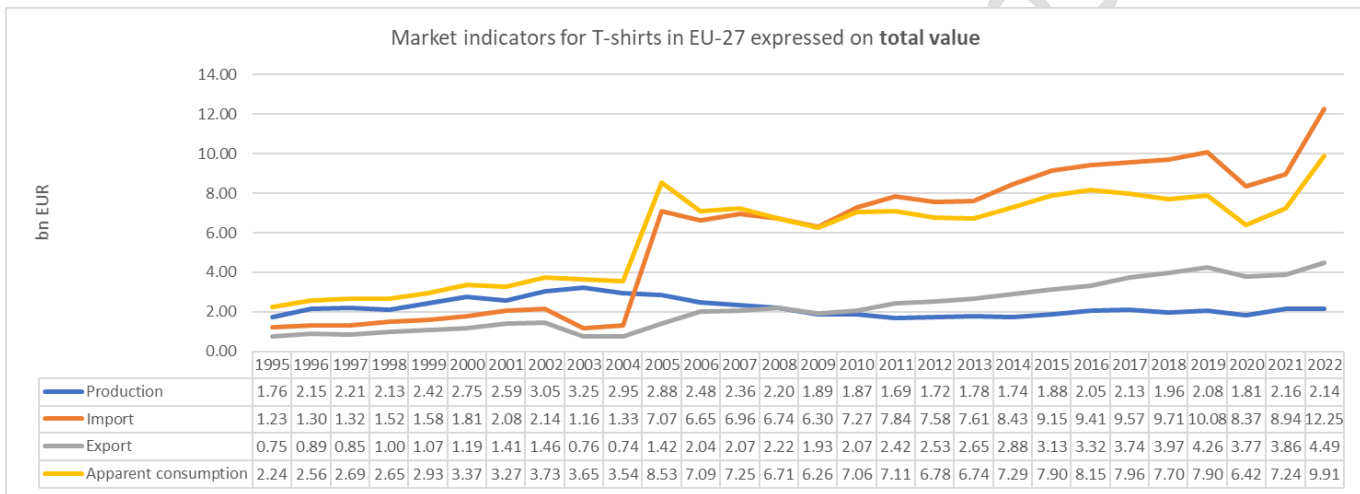
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Figure 30. Market indicators for T-shirts in EU-27



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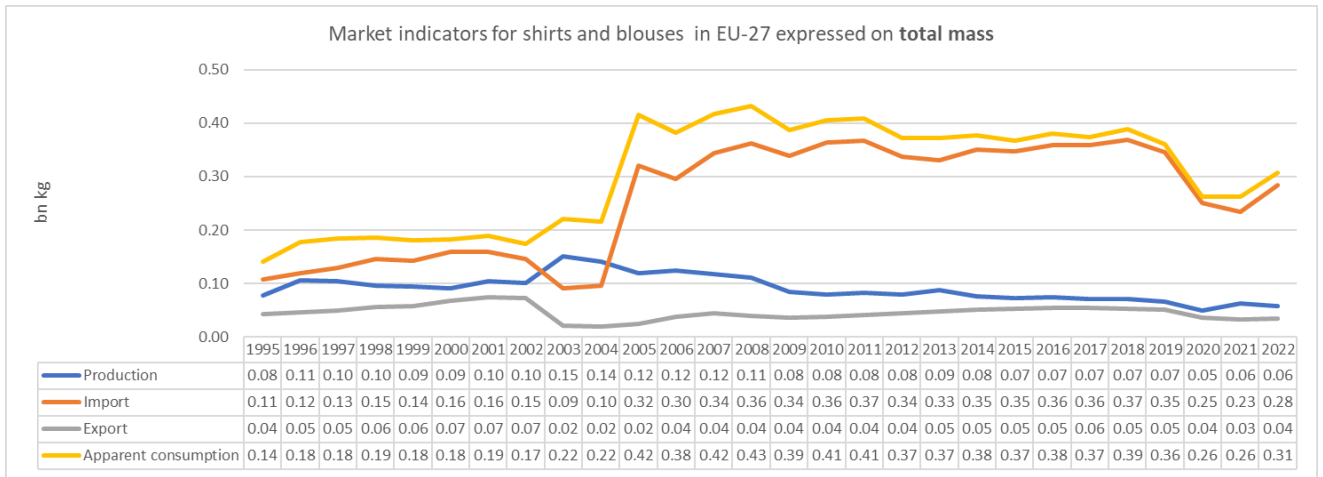
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Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

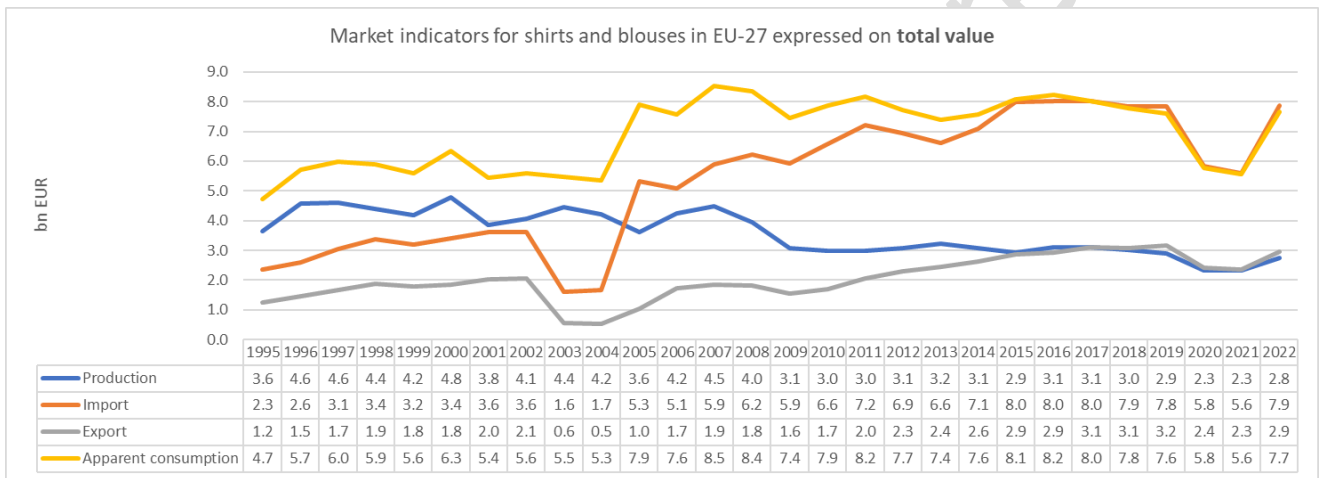
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Figure 31. Market indicators for shirts and blouses in EU-27



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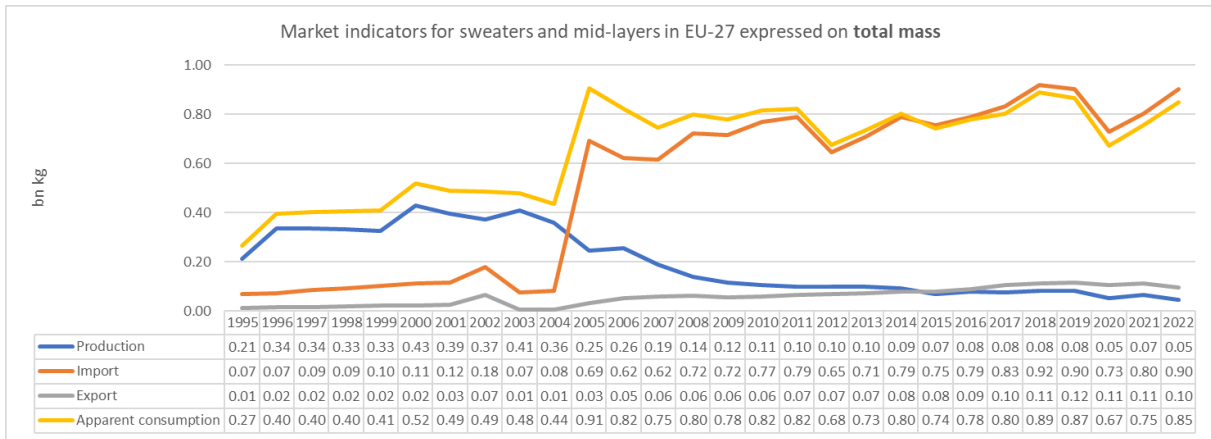
5445

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

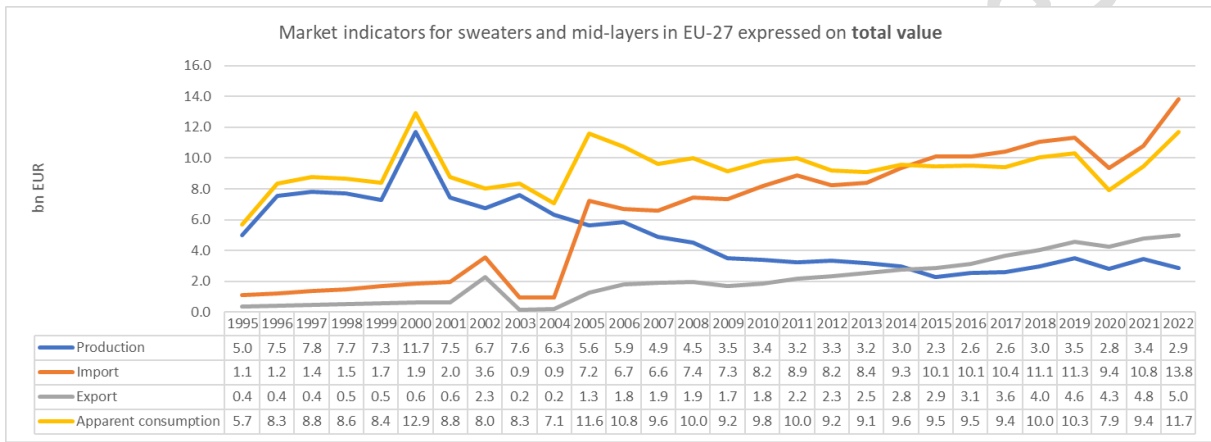
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Figure 32. Market indicators for sweaters and mid-layers in EU-27



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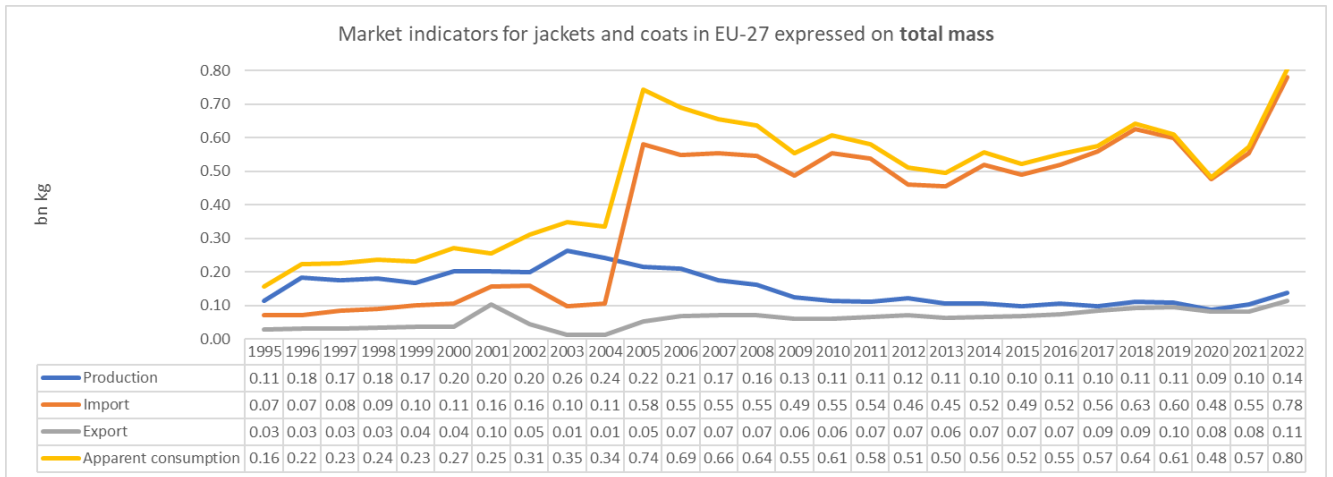
5450

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

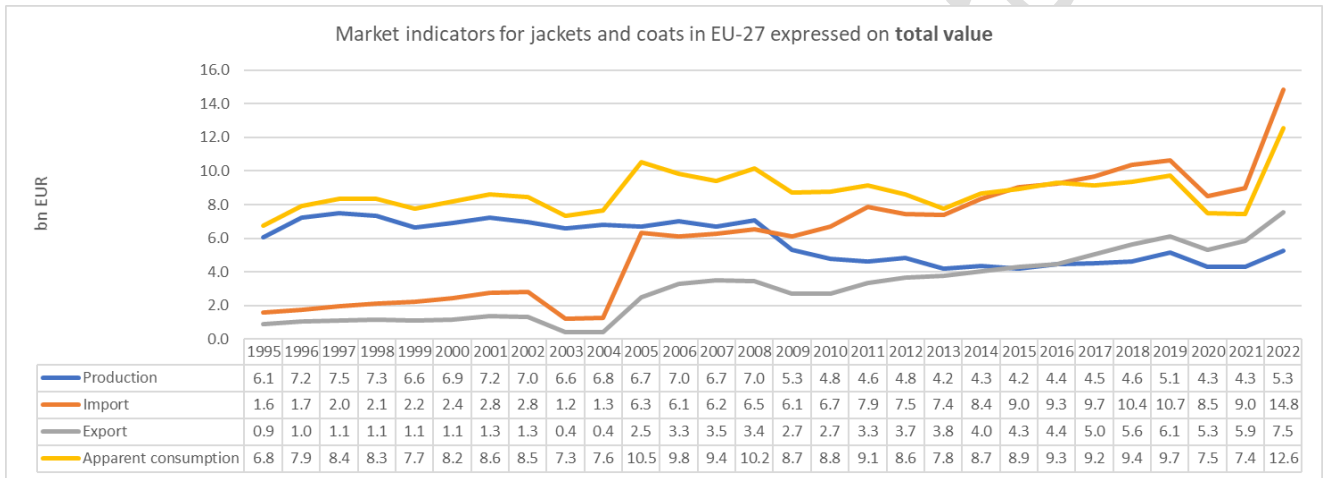
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Figure 33. Market indicators for jackets and coats in EU-27



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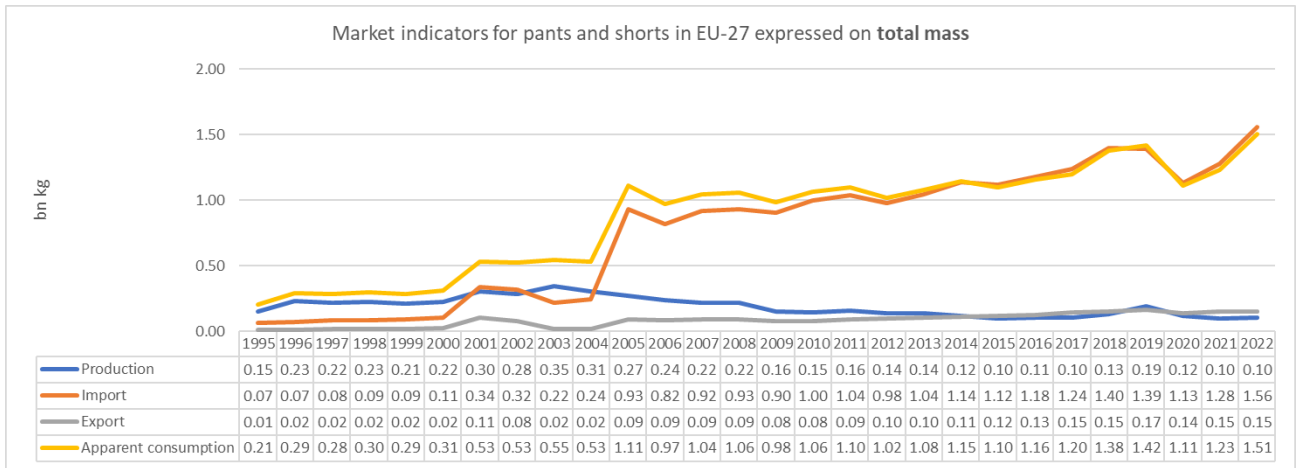
5455

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

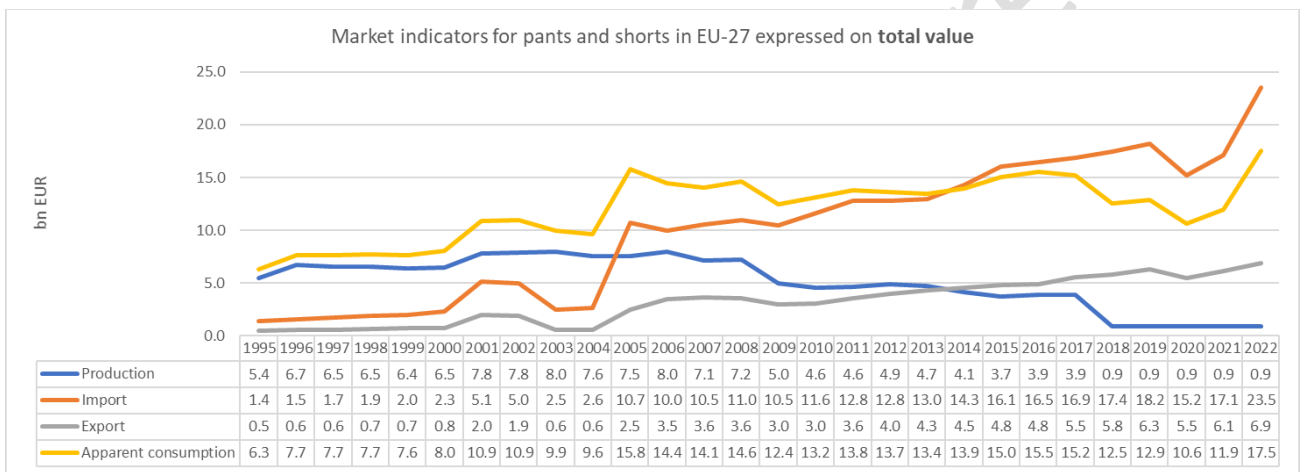
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Figure 34. Market indicators for pants and shorts in EU-27



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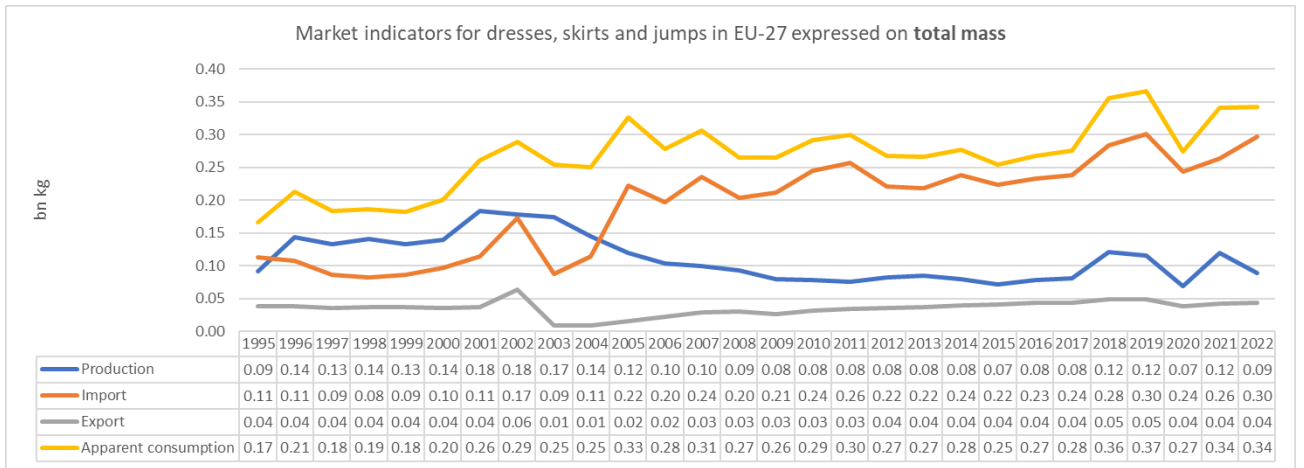
5460

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

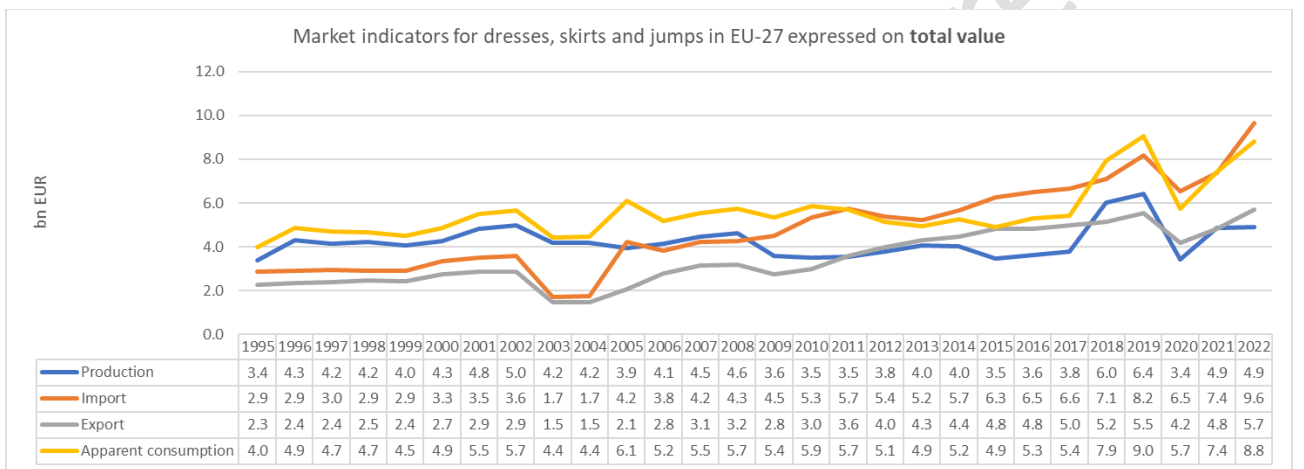
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Figure 35. Market indicators for dresses, skirts and jumps in EU-27



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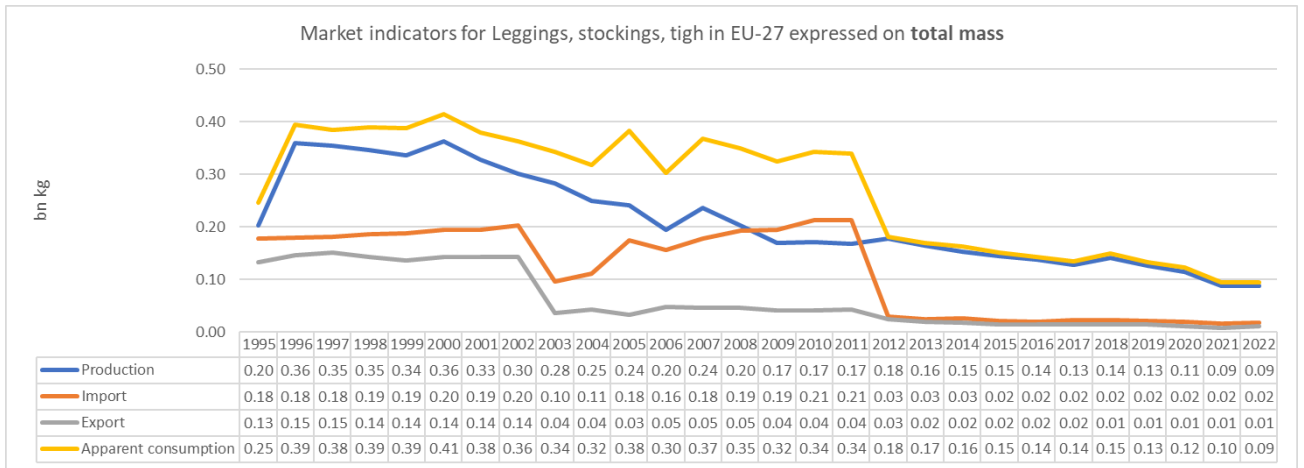
5465

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

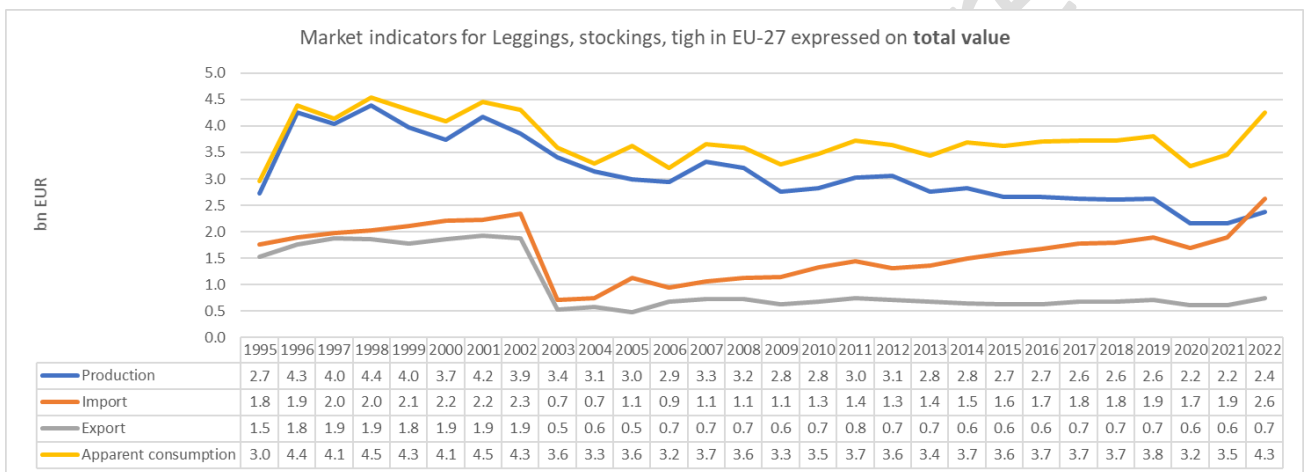
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Figure 36. Market indicators for leggings, stockings and tights in EU-27



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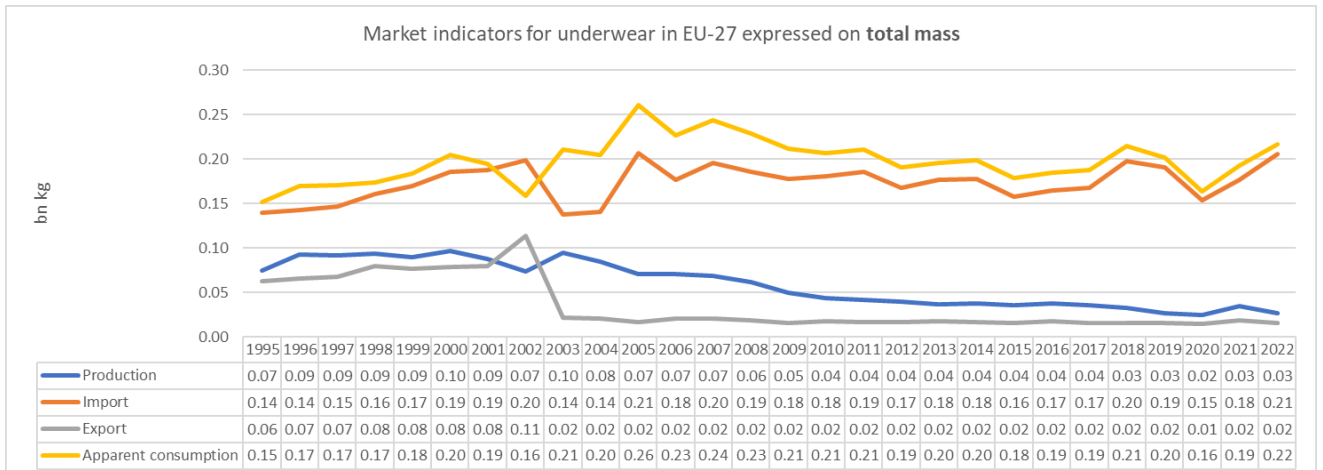
5470

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

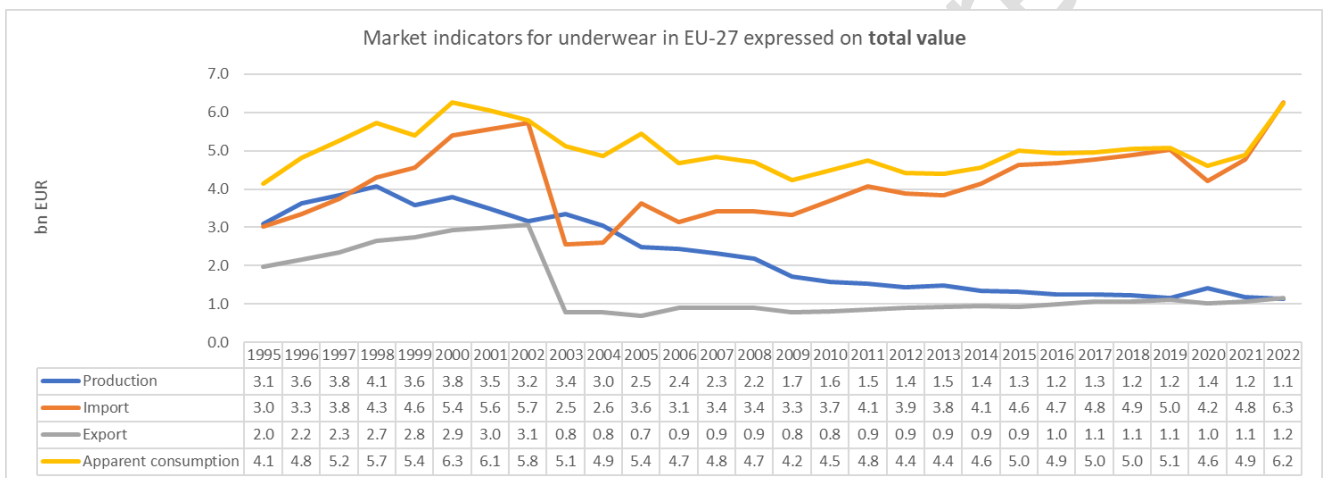
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Figure 37. Market indicators for underwear in EU-27



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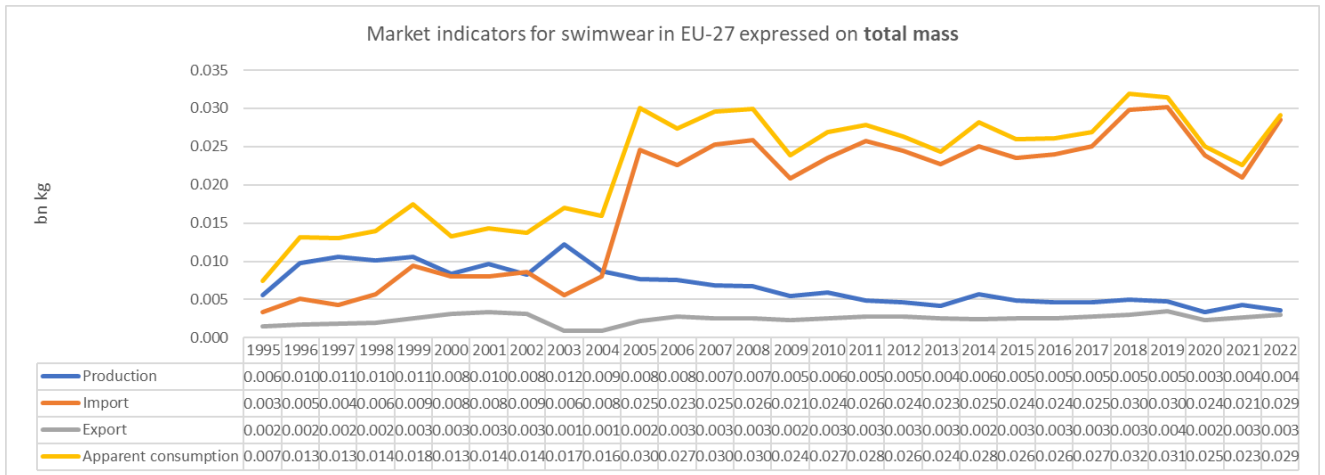
5475

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

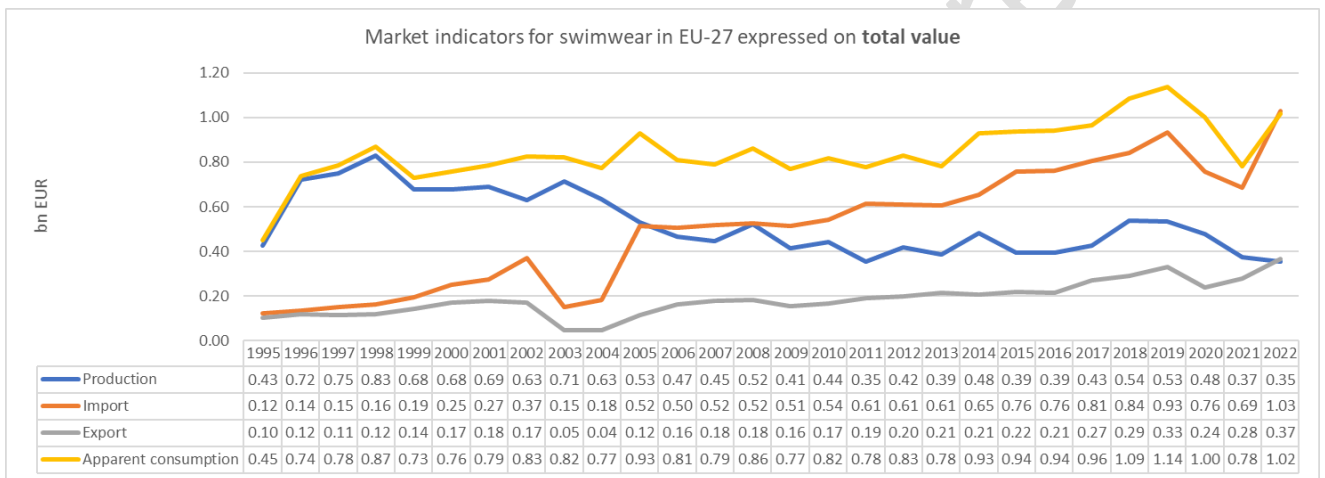
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Figure 38. Market indicators for swimwear in EU-27



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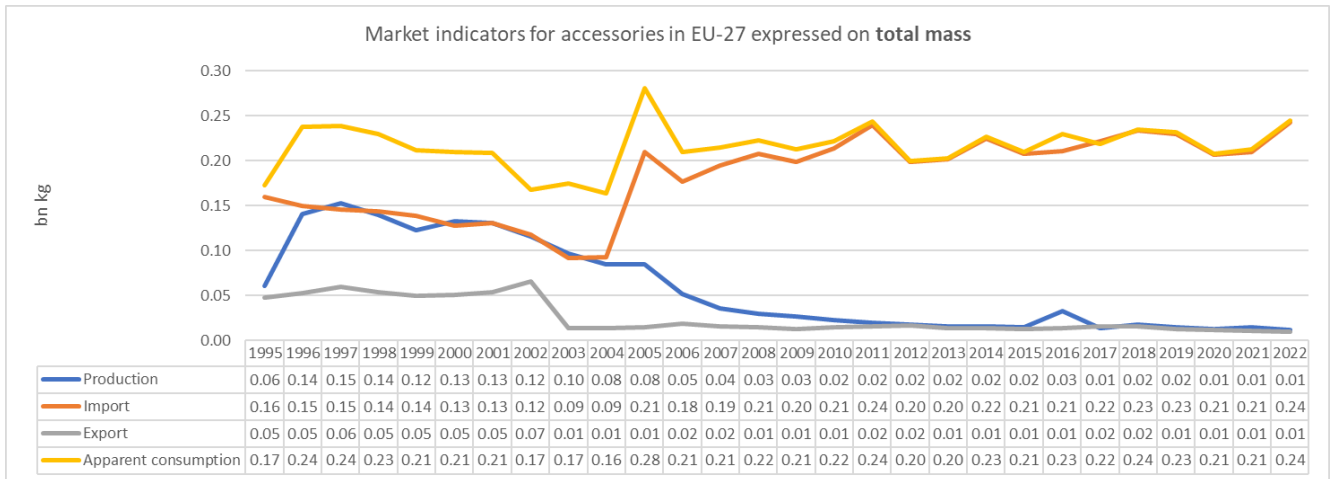
5480

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

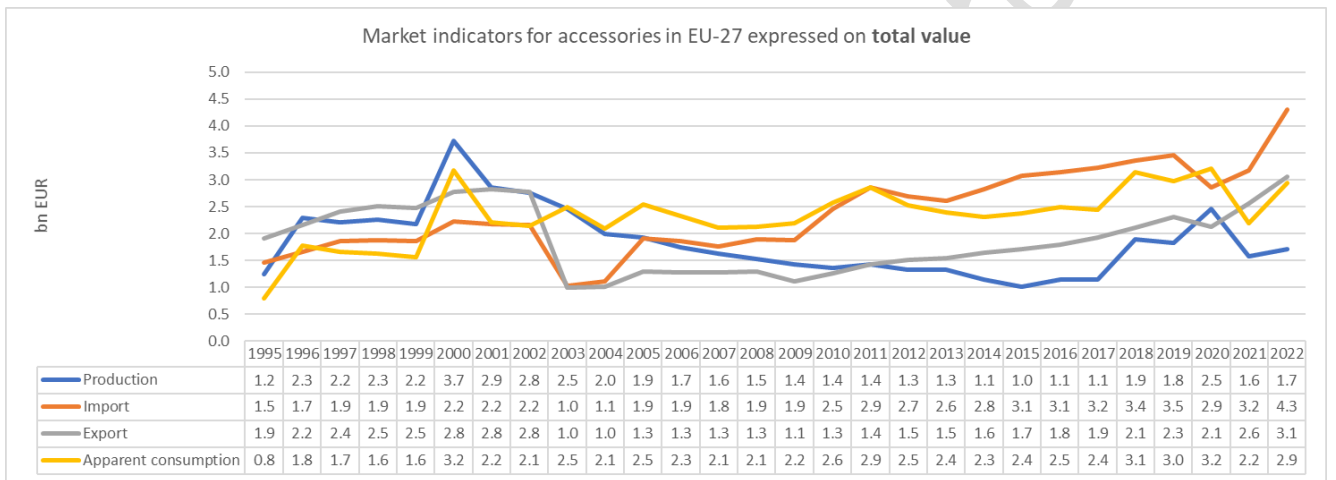
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Figure 39. Market indicators for accessories in EU-27



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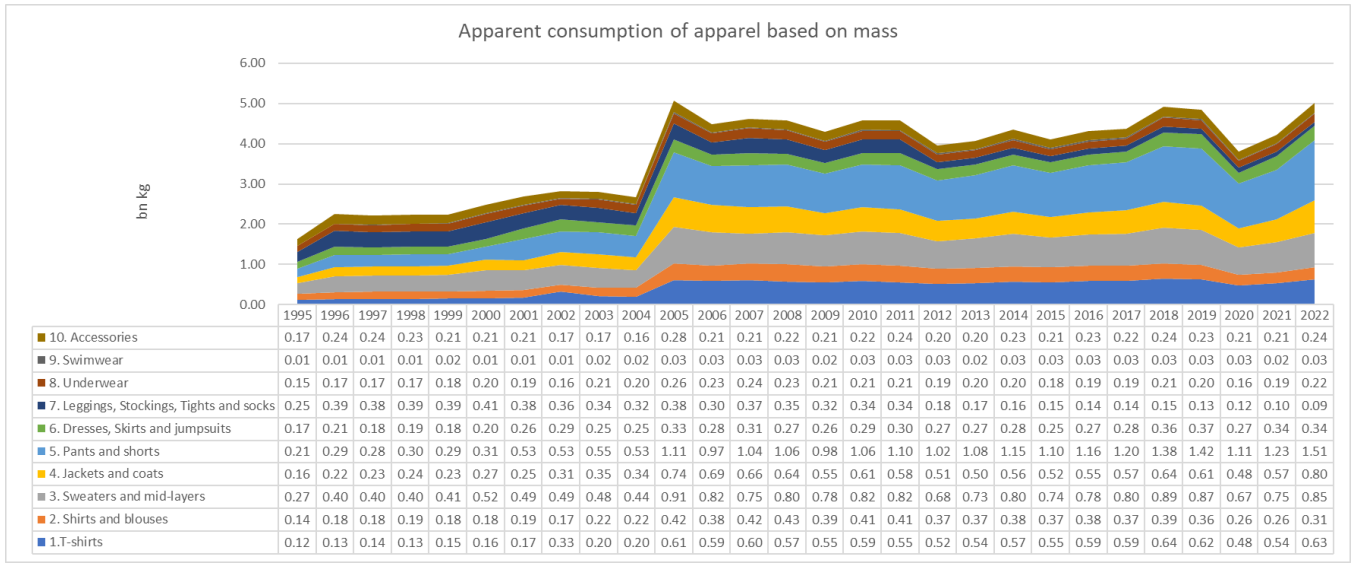
Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

5486

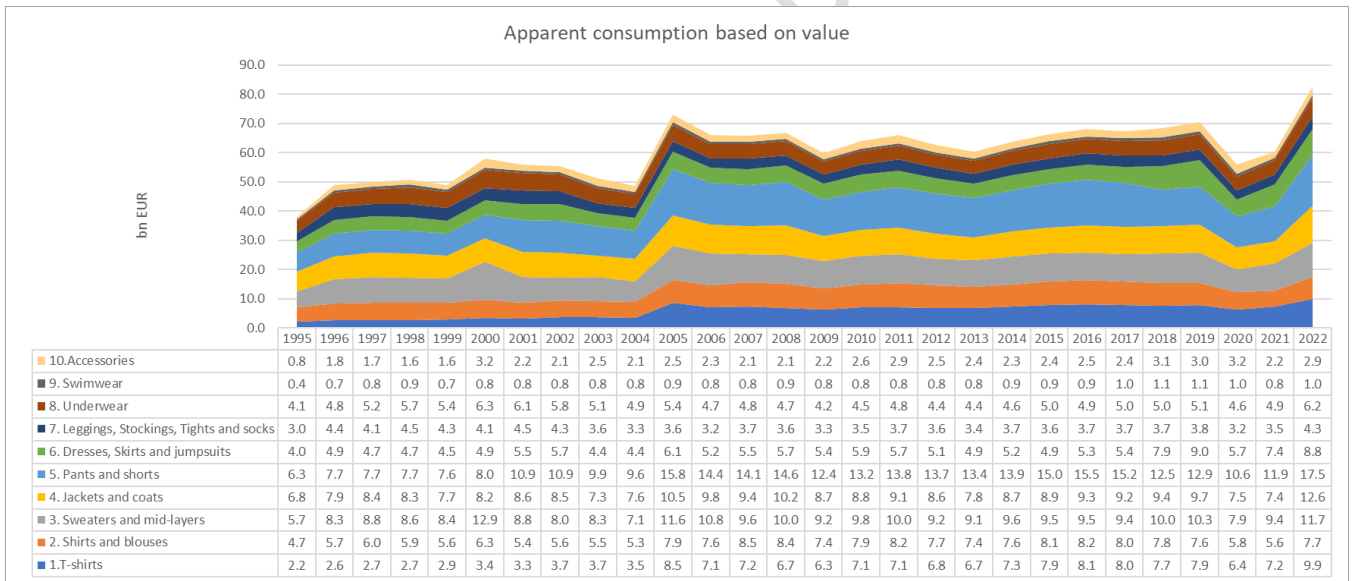
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Figure 40. Apparent consumption of textile apparel categories in EU-27



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(A) Total mass; (B) Total value

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

5494 **Table 61.** Change of apparent consumption after the removal of EU import quota in 2005

Textile apparel category	Mass (bn kg)		Change in mass (%)	Value (bn EUR)		Change in value (%)
	Average value in 1995-2004	Average value in 2005-2019		Average value in 1995-2004	Average value in 2005-2019	
1. T-shirts	0.17	0.58	236	3.15	7.36	133
2. Shirts and blouses	0.19	0.39	110	5.71	7.88	38
3. Sweaters and mid-layers	0.43	0.80	86	8.81	9.83	12
4. Jackets and coats	0.26	0.60	129	8.07	9.21	14
5. Pants and shorts	0.38	1.12	194	8.90	14.03	58
6. Dresses, Skirts and jumpsuits	0.22	0.29	33	4.85	5.83	20
7. Leggings, Stockings, Tights and socks	0.36	0.24	-33	4.13	3.59	-13
8. Underwear	0.18	0.21	15	5.48	4.77	-13
9. Swimwear	0.01	0.03	100	0.79	0.89	13
10. Accessories	0.20	0.22	11	2.08	2.49	20

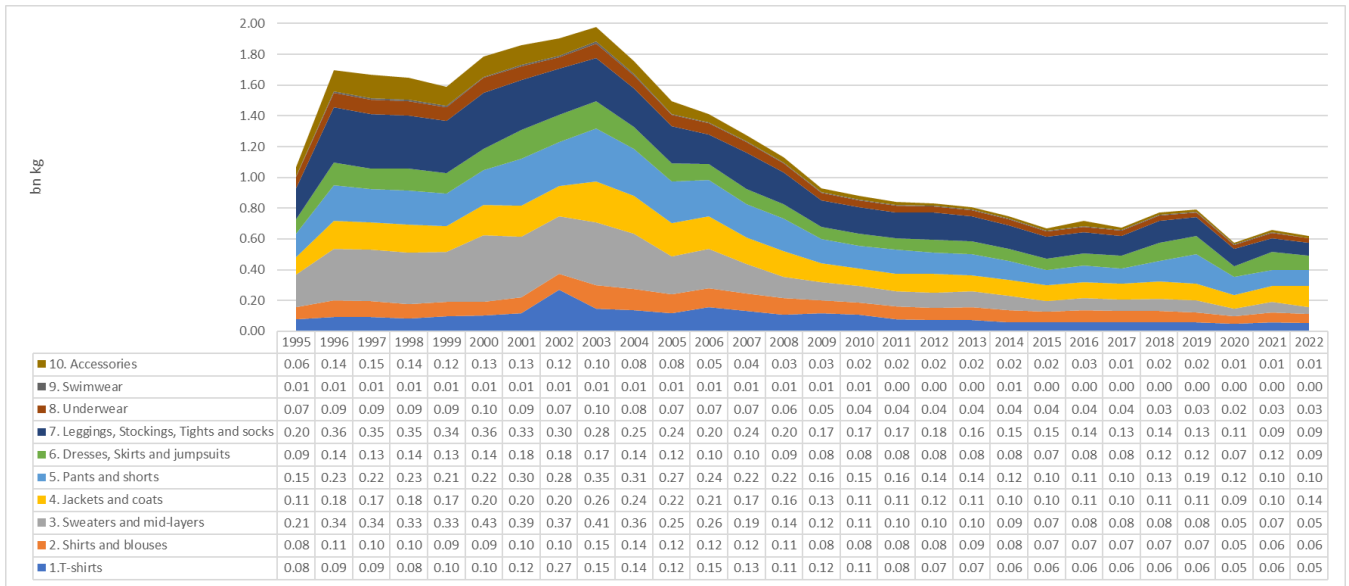
Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

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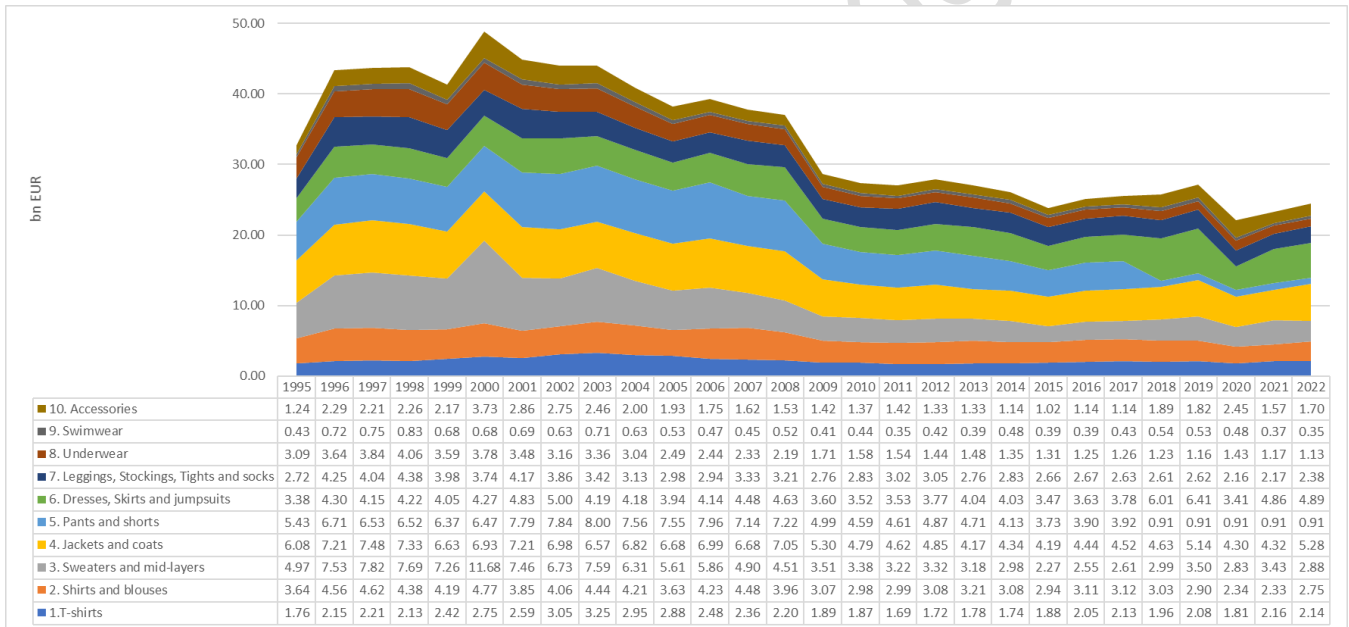
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Figure 41. Production of textile apparel categories in EU-27



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(A) Total mass; (B) Total value

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

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5504 **Table 62.** Change of production after the removal of EU import quota in 2005

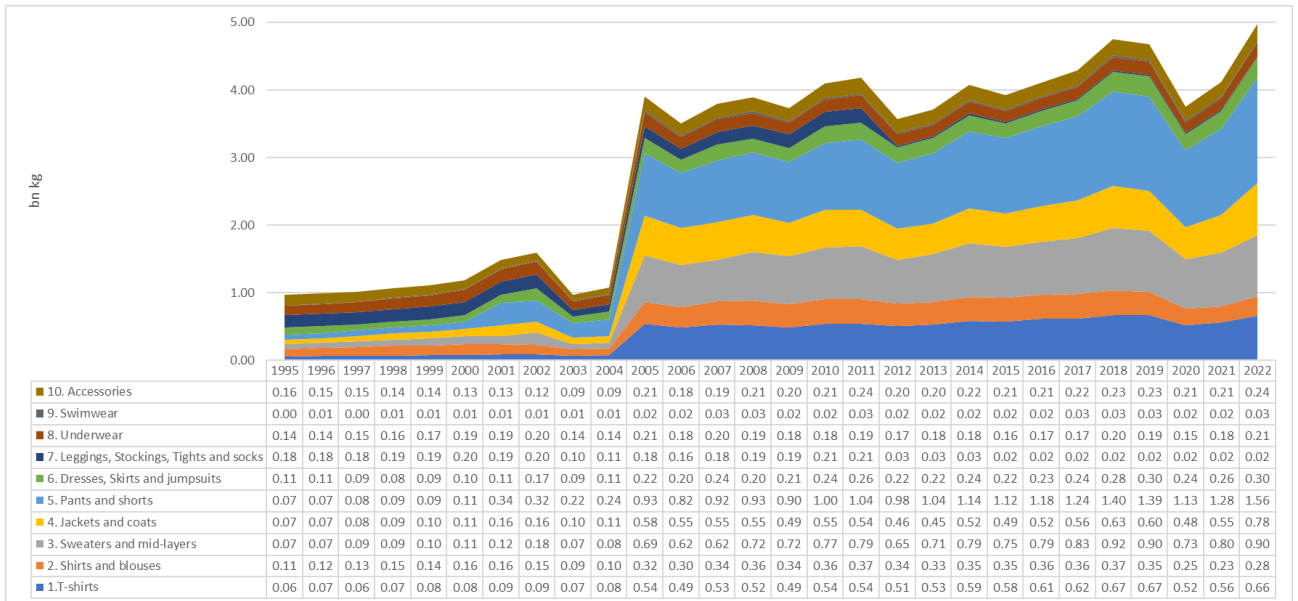
Textile apparel category	Mass (bn kg)		Change in mass (%)	Value (bn EUR)		Change in value (%)
	Average value in 1995-2004	Average value in 2005-2019		Average value in 1995-2004	Average value in 2005-2019	
1. T-shirts	0.12	0.09	-29	2.53	2.05	-19
2. Shirts and blouses	0.11	0.09	-18	4.27	3.32	-22
3. Sweaters and mid-layers	0.35	0.12	-65	7.50	3.63	-52
4. Jackets and coats	0.19	0.13	-32	6.92	5.23	-25
5. Pants and shorts	0.25	0.16	-35	6.92	4.74	-32
6. Dresses, Skirts and jumpsuits	0.15	0.09	-38	4.26	4.20	-1
7. Leggings, Stockings, Tights and socks	0.31	0.17	-45	3.77	2.86	-24
8. Underwear	0.09	0.05	-48	3.50	1.65	-53
9. Swimwear	0.01	0.01	-41	0.68	0.45	-33
10. Accessories	0.12	0.03	-77	2.40	1.46	-39

5505 *Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)*

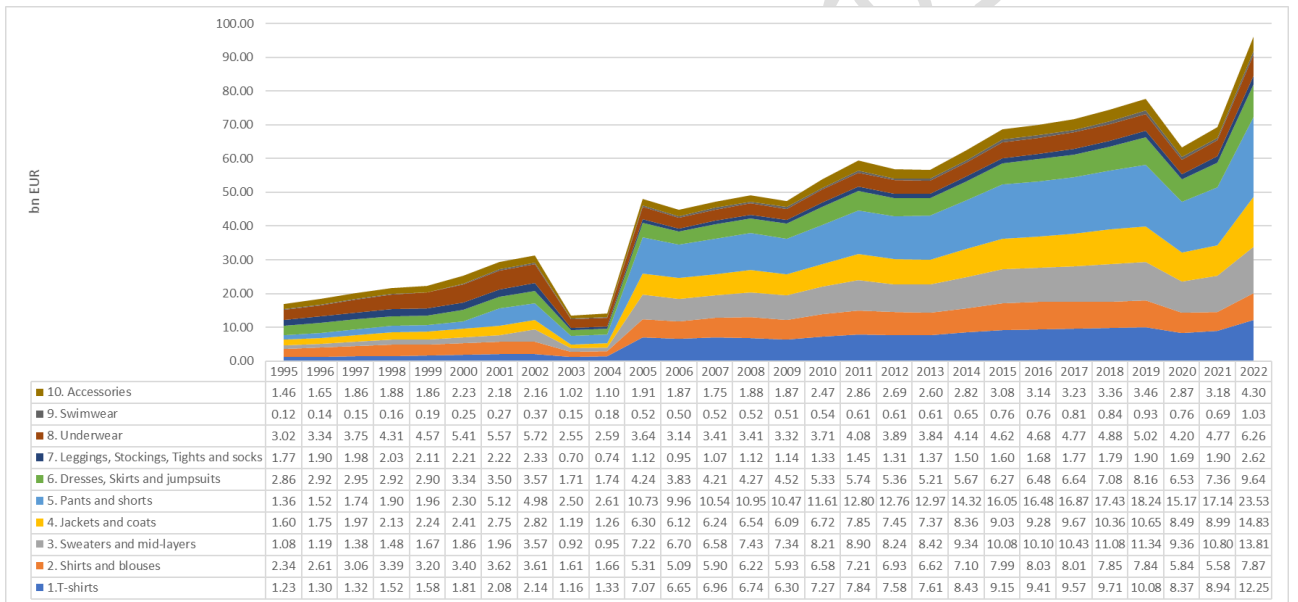
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Figure 42. Import of textile apparel categories in EU-27



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(A) Total mass; (B) Total value

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

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5514 **Table 63.** Change of import after the removal of EU import quota in 2005

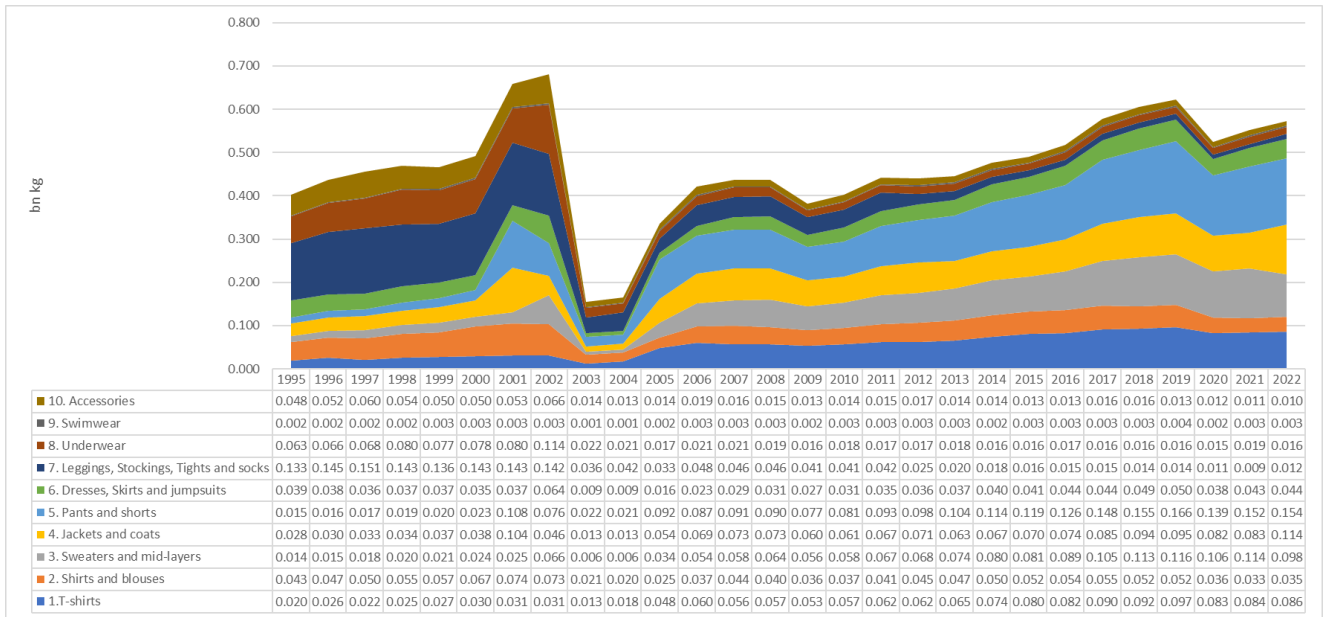
Textile apparel category	Mass (bn kg)		Change in mass (%)	Value (bn EUR)		Change in value (%)
	Average value in 1995-2004	Average value in 2005-2019		Average value in 1995-2004	Average value in 2005-2019	
1.T-shirts	0.07	0.56	650	1.55	8.03	419
2. Shirts and blouses	0.13	0.35	168	2.85	6.84	140
3. Sweaters and mid-layers	0.10	0.75	656	1.60	8.76	446
4. Jackets and coats	0.10	0.54	413	2.01	7.87	291
5. Pants and shorts	0.16	1.07	552	2.60	13.48	419
6. Dresses, Skirts and jumpsuits	0.11	0.24	121	2.84	5.53	95
7. Leggings, Stockings, Tights and socks	0.17	0.10	-41	1.80	1.41	-22
8. Underwear	0.16	0.18	12	4.08	4.04	-1
9. Swimwear	0.01	0.02	274	0.20	0.65	225
10. Accessories	0.13	0.21	63	1.74	2.60	49

5515 *Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)*

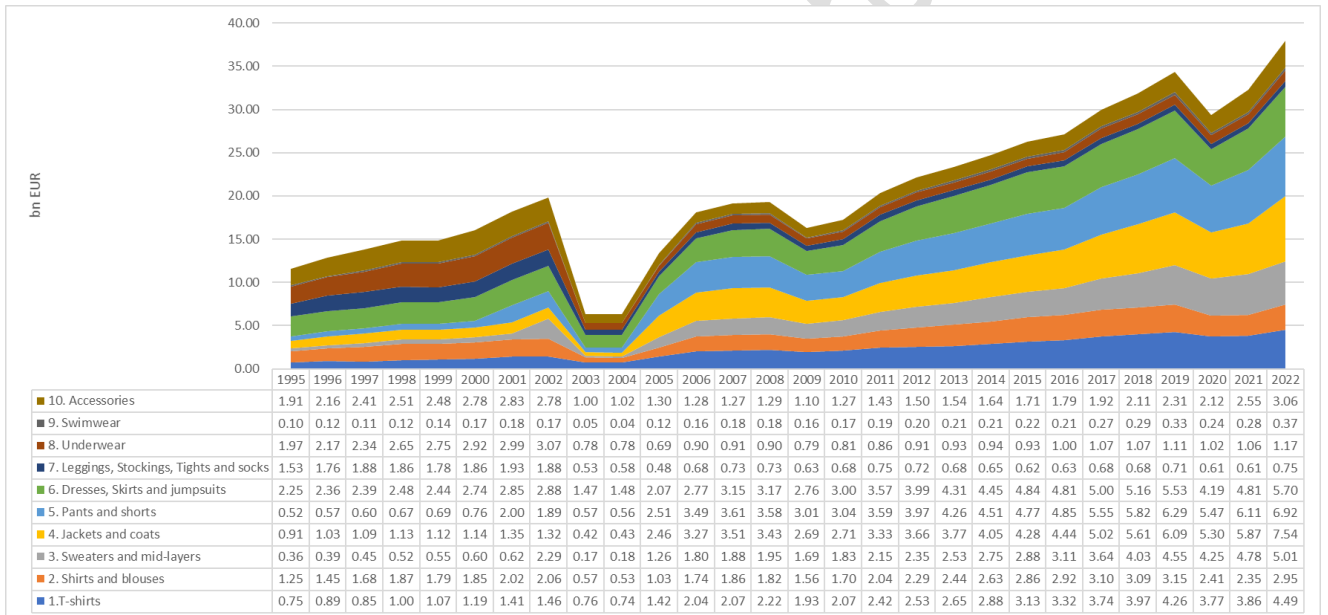
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Figure 43. Export of textile apparel categories in EU-27



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(A) Total mass; (B) Total value

Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

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5523 **Table 64.** Change of export after the removal of EU import quota in 2005

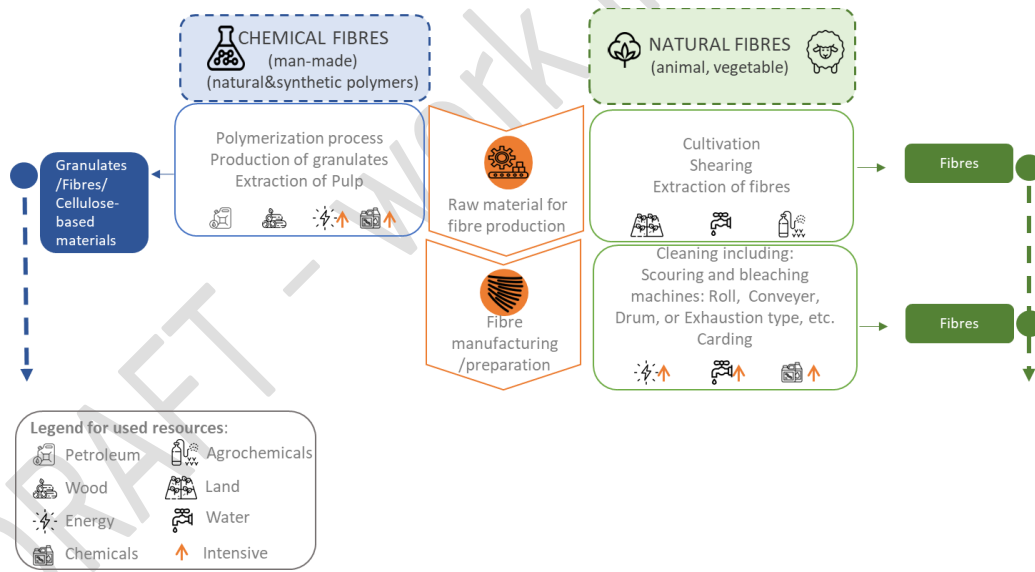
Textile apparel category	Mass (bn kg)		Change in mass (%)	Value (bn EUR)		Change in value (%)
	Average value in 1995-2004	Average value in 2005-2019		Average value in 1995-2004	Average value in 2005-2019	
1. T-shirts	0.02	0.07	186	1.01	2.71	168
2. Shirts and blouses	0.05	0.04	-12	1.51	2.28	51
3. Sweaters and mid-layers	0.02	0.07	246	0.61	2.56	318
4. Jackets and coats	0.04	0.07	91	0.99	3.89	291
5. Pants and shorts	0.03	0.11	226	0.88	4.19	375
6. Dresses, Skirts and jumpsuits	0.03	0.04	4	2.33	3.90	67
7. Leggings, Stockings, Tights and socks	0.12	0.03	-76	1.56	0.67	-57
8. Underwear	0.07	0.02	-74	2.24	0.92	-59
9. Swimwear	0.00	0.00	26	0.12	0.21	70
10. Accessories	0.05	0.01	-68	2.19	1.56	-28

5524 Source: own production based on PRODCOM database (Sold production, exports and imports – DS-056120)

5525 **10.2 Life-cycle stages of textile apparel**

5526 **10.2.1 Raw material and fibre manufacturing**

5527 **Figure 44.** Raw material for fibre production and fibre preparation



5528

5529 Source: production adapted from (McKinsey & Company, 2022), icons from www.flaticon.com

5530 **Raw material for fibre production**

5531 *Natural fibres*

5532 The primary raw material for vegetable-based fibres is cellulose, which is the most prevalent natural polymer
 5533 in nature. Cellulose is sourced from agricultural crops, which often require significant land and water use. The
 5534 production process typically involves a high use of chemicals, like pesticides (Jana et al., 2023) (Roth et al.,
 5535 2023). After the production process, the result is staple fibres. Following a pre-treatment or preparation phase,
 5536 these fibres then serve as the input for the yarn production stage.

5537 Animal-based fibres, also known as protein fibres, are sourced from animals through methods such as shearing
 5538 or collecting silkworm cocoons. This requires farming animals like sheep or silkworms, either on pastures or

5539 through sericulture (Roth et al., 2023) (Jana et al., 2023). The production yields staple fibres, which, after a pre-
5540 treatment phase, are used in yarn production.

5541 *Chemical fibres*

5542 Man-made chemical fibres derived from natural polymers use cellulose, often from sources like wood pulp, as
5543 their primary raw material. This cellulose is then dissolved to produce a solution suitable for the next stage of
5544 fibre production. The key components in this process are the wood feedstock, which come from various sources,
5545 and the chemicals used in the dissolution process (Jana et al., 2023).

5546 Man-made chemical fibres made from synthetic polymers use petroleum as raw material. This is processed
5547 using energy-intensive chemical reactions, which vary depending on the specific synthetic fibre, to produce
5548 synthetic polymers. These polymers are then turned into granules (Roth et al., 2023). These granules are then
5549 prepared for the subsequent fibre production process (Jaffe and Menczel, 2020).

5550

5551 **Fibre manufacturing/preparation**

5552 *Manufacturing of natural and chemical fibres*

5553 Staple fibres of natural origin, man-made chemical staple fibres derived from natural polymers, and synthetic
5554 granules produced in the raw material stage all undergo the manufacturing process. The specific production
5555 steps they undergo vary based on the source of the raw material.

5556 *Preparation of natural fibres*

5557 Natural staple fibres go through similar preparation stages before yarn manufacturing. This typically involves
5558 a scouring or cleaning process before carding. The exact procedures vary based on the fibre type, whether
5559 cellulosic (like cotton) or protein-based (like wool). The primary distinction arises from the type and amount of
5560 impurities present in the natural fibres.

5561 Wool, a protein fibre, undergoes scouring, which is typically a wet cleaning process using detergents to remove
5562 dirt, oils, and other contaminants. After scouring, the wool is usually bleached with hydrogen peroxide, to remove
5563 its natural colour and any remaining impurities, preparing it for subsequent treatments or dyeing. This is then
5564 followed by drying. Overall, this process is intensive in terms of water, energy, and chemicals.

5565 The cotton cleaning process involves dry procedures carried out in a blowing room. This room houses
5566 technologies that move the raw materials through various airflow cleaning systems, integrated within a
5567 mechanical cleaning process.

5568 Furthermore, because natural fibres have inconsistent properties, they may undergo wet chemical processes,
5569 such as bleaching, and other treatments to enhance and modify them.

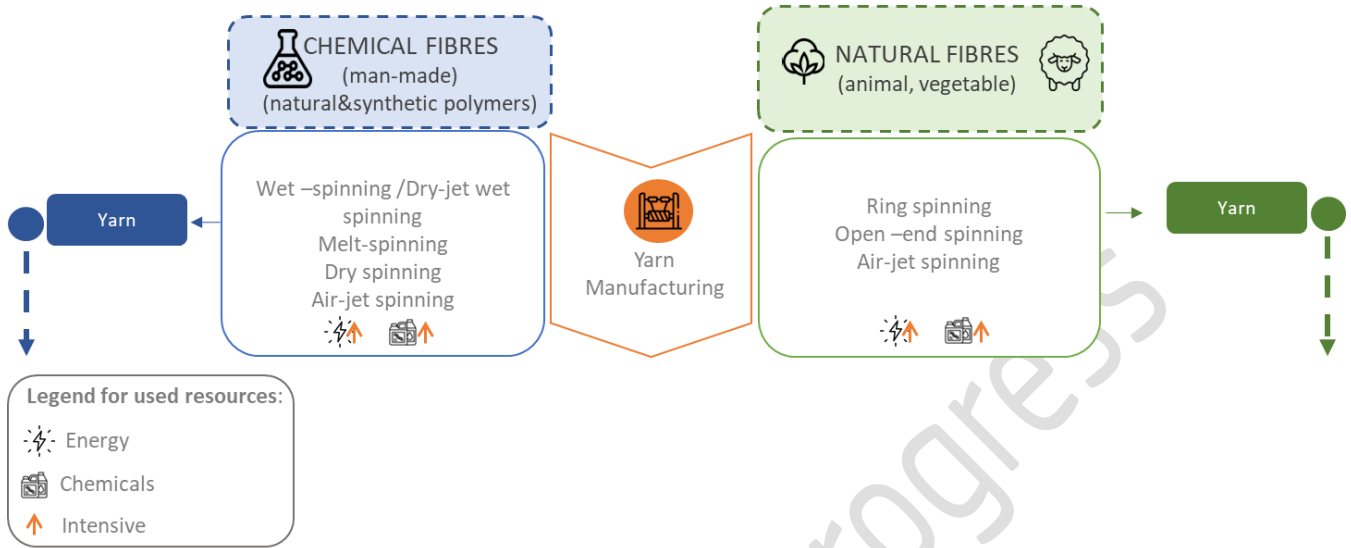
5570 *Preparation of chemical fibres*

5571 Chemical fibres skip the preparation stage, as the staple fibres and granules are used directly for the yarn
5572 production (spinning).

5573

5574 **10.2.2 Yarn manufacturing**

5575 **Figure 45.** Yarn manufacturing (spinning process)



5576

5577 *Source: own production and adapted from (McKinsey & Company, 2022), icons from www.flaticon.com*

5578 Carded natural fibres, cellulose – based material, and polymer granulates serve as inputs for the spinning
5579 process, which produces yarns.

5580 In the textile industry, the definition of spinning varies based on the type of fibre being processed:

5581 — Natural origin fibres: Spinning for these fibres involves passing the staple fibres through a series
5582 of rollers to straighten and align them, then twisting them to create a continuous yarn (Britannica,
5583 2019). Each type of natural fibre goes through a unique set of steps for yarn production. For all,
5584 the initial step is carding, a mechanical process that further cleans and disentangles the fibres,
5585 aligning them. This is followed by other processes such as combing, drawing, and more. Typical
5586 spinning machines for natural fibres include ring spinning and open-end spinning (Roth et al.,
5587 2023).

5588 — Chemical (man-made) fibres: Spinning refers to the extrusion of a solution, like viscose/cellulose-
5589 based materials or dissolved granules, to produce a fibre or yarn. Standard industrial spinning
5590 machines for these fibres are:

5591 • melt spinning: polymer melted in a melt extruder, and is suitable for thermoplastic fibres such as
5592 polyester, polyamide, polyolefins, glass fibre and many more;

5593 • wet spinning: polymer dissolved in a solvent, being suitable for viscose and acrylic fibres dry
5594 spinning: polymer dissolved in a solution, applicable for acetate, triacetate and polyacrylonitrile.

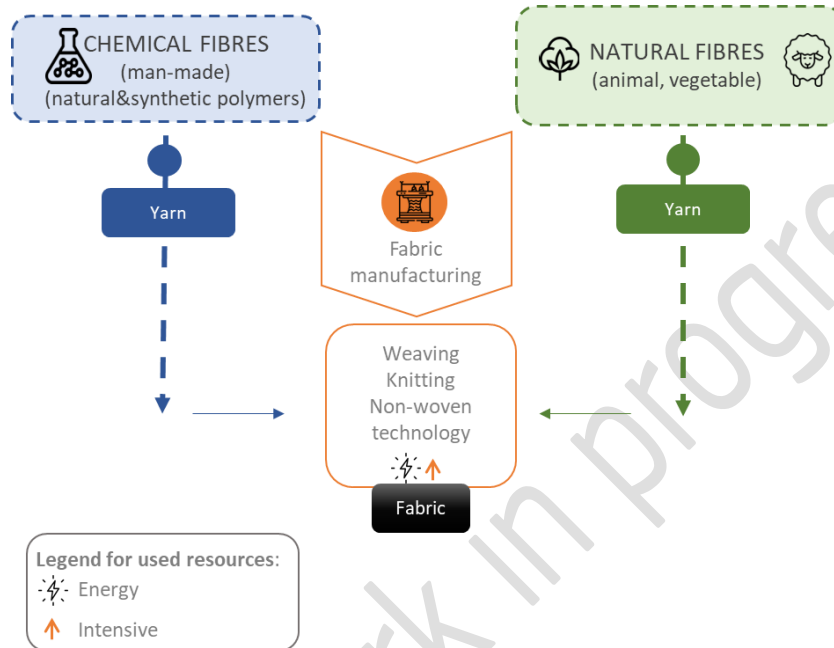
5595 ■ Man-made cellulosic fibres: Spinning filaments into yarns involves processes where
5596 cellulose from wood pulp is dissolved using specific chemical solvents (e.g., sodium
5597 hydroxide for viscose, ammonia-copper solution for cupro, NMMO for lyocell, or acetic
5598 acid for acetate), and the resulting solution is typically extruded and coagulated using
5599 wet spinning techniques. Nevertheless, for staple fibres, ring or open-end spinning is used.

5600 Drawing or air texturizing is performed to give to the chemical yarns a texture similar to natural yarns. Such
5601 treatments are carried out with energy demanding equipment (Roth et al., 2023).

5602

5603 **10.2.3 Fabric manufacturing**

5604 **Figure 46.** Fabric manufacturing process



5605

5606 *Source: own production adopted from (McKinsey & Company, 2022), icons from www.flaticon.com*

5607 The central phase of textile production is fabric manufacturing. This involves creating a two-dimensional
5608 structure by interlacing yarns. Common methods include weaving, knitting, and producing non-woven fabrics,
5609 suitable for all yarn types.

5610 **Weaving** is the predominant fabric manufacturing technique. It involves interlacing two sets of yarns at right
5611 angles on a loom. Most looms are power-driven, termed 'power looms', and are energy intensive. There are also
5612 manual looms, which are labour-intensive. Key resources in weaving include chemicals for sizing and desizing
5613 textiles and oils for lubricating the loom. Sizing protects the yarn from the loom's abrasive action, while desizing
5614 removes these chemicals from the woven fabric after weaving (Roth et al., 2023).

5615 **Knitting** is the second most used fabric manufacturing method. In this case, yarns are interlooped using
5616 needles to form fabric on knitting machines. These machines are broadly categorised as weft¹⁸¹ (either flat or
5617 circular) and warp¹⁸², based on the fabric's formation direction (horizontal or vertical). They're further classified
5618 by machine shape and knitting technology. This method is energy intensive. To prevent yarn damage, substances
5619 like sizing chemicals and lubricants are used for yarn strengthening and reducing friction (Roth et al., 2023).

5620 **Non-woven** technology produces textile structures by bonding fibres or filaments together, either mechanically,
5621 thermally, or chemically. According to the Association of the Non-woven Fabrics Industry (INDA), they are "flat,
5622 porous sheets made directly from separate fibres or molten plastic. They are neither woven nor knitted and
5623 don't convert fibres to yarn" (INDA, 2023). Various non-woven processes exist, categorised by web-forming
5624 technologies and product consolidation. Common technologies include drylaid¹⁸³, wetlaid¹⁸⁴, spunmelt¹⁸⁵,

¹⁸¹ The fabric is formed based on loops made on horizontal way from a single yarn, which is fed and looped in rows by one or more needles at a time (Roth et al., 2023).

¹⁸² The yarn is fed into the knitting forming vertical loops, and moves diagonally to knit the next course (yarns generate a zigzag from side to side along the length of the fabric) (Ray, 2012).

¹⁸³ The process of fabric web forming with a stream of air, applied on dry fibres by using carding equipment (INDA, 2023).

¹⁸⁴ The process of fabric web forming filtering an aqueous suspension of fibre onto a screen conveyor belt or perforated drum. The fibres are retained on the screen, while the water passes through (INDA, 2023).

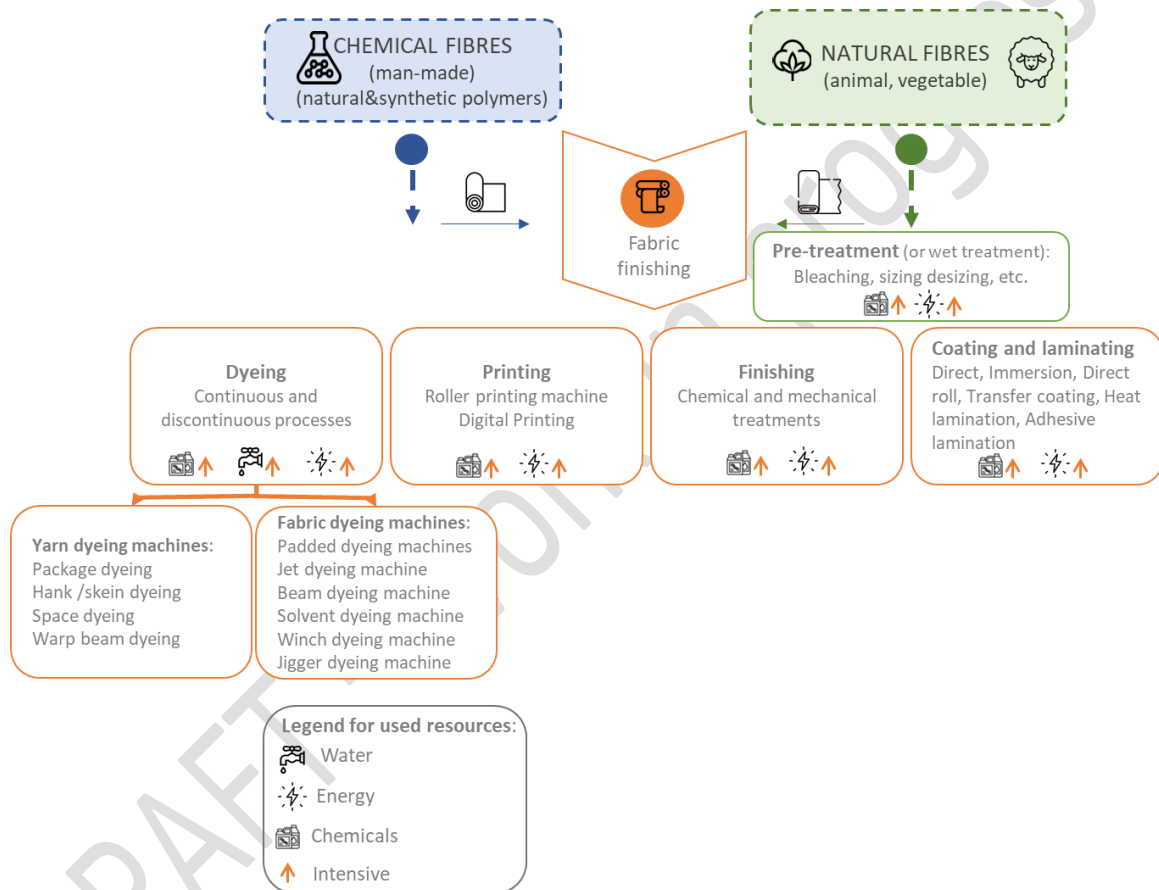
¹⁸⁵ The process of non-woven manufacturing through the extrusion of molten polymer spinneret to form fibres, drawing the fibres, and then laying them on a moving screen to form a web. The term "spunlaid" is often used interchangeably with "spunbond" (INDA, 2023).

5625 and needle-punched⁽¹⁸⁶⁾. However, many other processes are available⁽¹⁸⁷⁾ (Batra and Pourdeyhimi, 2012)
 5626 (Mao, 2016). Overall, non-woven technology is energy intensive.

5627 In the knitting or weaving process, the type of yarn used, and its count (indicating fabric thickness) influence
 5628 the durability and strength of the final product, such as its seam or tear resistance (Yassen, 2017) (Jankoska
 5629 and Demboski, 2017). Non-woven fabrics present recycling challenges due to the fibre composition and the
 5630 consolidation components used in their production.

5631 **10.2.4 Finishing processes**

5632 **Figure 47.** Fabric/yarn finishing processes



5633
 5634 *Source: own production adapted from (McKinsey & Company, 2022), icons from www.flaticon.com*

5635 Finishing processes are an intermediate stage in treating yarn and/or fabrics with colorants and chemicals. This
 5636 includes various wet treatments aimed at different objectives, such as sizing, desizing, pre-treatment, dyeing,
 5637 printing, finishing, and more. These treatments are applied based on the specific requirements of the final
 5638 products, rather than in a sequential manner. Each treatment utilises distinct technologies and chemicals,
 5639 making this one of the most water and chemically intensive stages

5640 *Pre-treatment*

5641 Pre-treatment is typically applied to natural fibre fabrics. It encompasses processes like bleaching, scouring,
 5642 mercerising¹⁸⁸, and others, preparing the fabrics for final treatments before dyeing, printing, and finishing. These

¹⁸⁶ The mechanical process that uses barbed needles to pull tufts of fibres from the web and insert them vertically into the web, which bonds the fibres together (INDA, 2023).
¹⁸⁷ Definitions of the technologies can be found in the Glossary of the Association of the Non-woven Fabrics Industry. Available [here](#).
¹⁸⁸ Mercerising is the process of treatment of cotton fabrics to increase dyeability (generally involving the use of sodium hydroxide) (Roth et al., 2023).

5643 processes heavily rely on chemicals, using inputs like oxidising agents (e.g., chlorine, sodium hypochlorite,
 5644 calcium hypochlorite, hydrogen peroxide), scouring alkali (e.g., caustic soda), sodium hydroxide, and also
 5645 consume significant amounts of energy and water.

5646 *Dyeing*

5647 Dyeing is the process where dye particles diffuse into the textile material. This involves forming chemical bonds
 5648 between the dye molecules and the textile. This is achieved based on the dye-fibre chemical affinity and the
 5649 specific dyeing process. Dyes can be natural or man-made (synthetic) and are molecules containing
 5650 chromophores that interact with light to produce colour (Singh and Bharati, 2014). Textile dyeing uses specific
 5651 dyes that have an affinity or 'chemical attraction' to particular fibres. **Table 65** reports the fibres and their
 5652 corresponding dyes, ensuring shades meet performance and fastness standards (Roth et al., 2023).

5653 **Table 65.** Affinity relationship between dyes and fibres

Fibre type	Fibre name	Dye type
Cellulosic	Cotton	Direct dyes
	Linen	Reactive dyes
	Hemp	Vat dyes
	Jute	Sulphur dyes
	Modal	
	Lyocell	
Proteic	Wool	Acid dyes
	Silk	Premetallised dyes
	Other fibres of animal hair	Reactive dyes
Man-made	Polyamide	Acid dyes
		Premetallised dyes
	Acrylic	Cationic dyes
Polyester	Disperse dyes	
	Disperse dyes	

5654 *Source: own elaboration based on (Clark, 2011)*

5655 The affinity between the dye and fibre affects the final performance indicators for durability, such as washing
 5656 and colour fastness. Moreover, various chemicals and auxiliary products are needed to enhance the efficiency
 5657 and quality of the colouration process.

5658 Dyeing can be conducted in batch, continuous, or semi-continuous modes and is suitable for both yarns and
 5659 fabrics. The process requires specific temperatures and pressures for set durations. Discontinuous dyeing
 5660 machines include autoclaves, hank dyeing machines, winches, becks, overflows, jets, jigs, paddles, and drum
 5661 dyeing machines. Examples of continuous dyeing machines are pad-batch, pad-roll, pad-jig, pad-dry, and
 5662 thermosol machines.

5663 Overall, the dyeing process consumes significant amounts of water, chemicals, and energy.

5664 *Printing*

5665 Printing is the colouration process that involves applying dye or pigment to the substrate surface with the aid
 5666 of specific auxiliaries. This allows for colouring different areas and creating patterns.

5667 Pigments, whether natural or man-made, are insoluble molecules containing chromophores and typically lack
 5668 affinity to fibres (Singh and Bharati, 2014). The colouring process involves applying a colour paste to the textile
 5669 using various techniques, followed by fixation. An after-treatment may also be applied, though it can be optional.

5670 — Pigment printing is the most commonly used technique. It does not rely on fibre affinity, allowing
 5671 for the colouring of all fabric types. The colour's fixing to the fabric surface is determined by the
 5672 auxiliaries used, such as binders, thickening agents, and others.

5673 — Dye printing requires a more intricate composition for the printing paste. This complexity is
 5674 influenced by the printing technique, substrate type, application method, and fixation procedures.

5675 For both types of printing, the technology determines how the printing paste is applied. The most common
 5676 methods include flat-screen printing, rotary-screen printing, roller printing, jet printing, and transfer printing
 5677 (Roth et al., 2023).

5678 The performance indicators for durability, such as washing and colour fastness, are affected by the composition
5679 of the printing pastes and the fixation methods. Since pigments do not bond with fibres, their colour fastness
5680 is less efficient as when dyes are used in the colouration process.

5681 Overall, the process requires significant amounts of chemicals and energy.

5682 *Finishing*

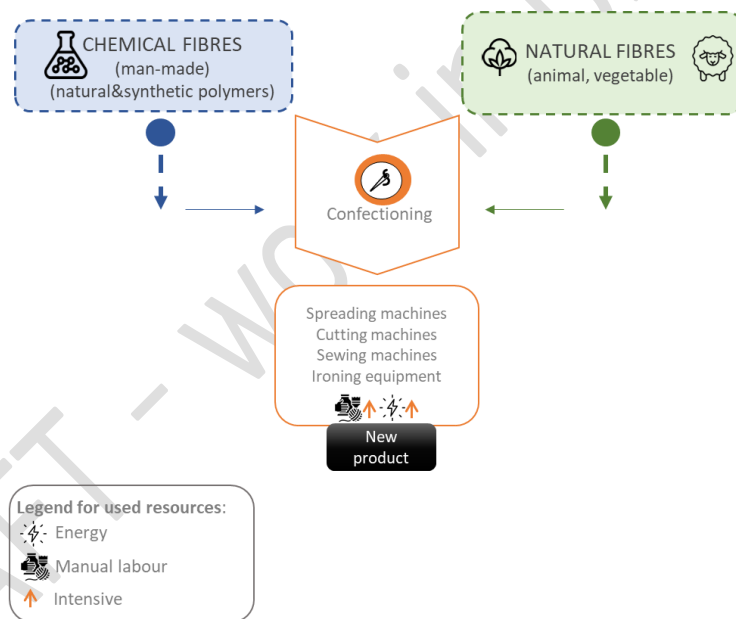
5683 Finishing includes treatments designed to give textile substrates specific end-use properties, like unique visual
5684 effects, feel, or functional features such as waterproofing or flame resistance. A variety of chemical and
5685 mechanical/physical treatments are associated with this manufacturing stage, and they are typically applied
5686 after the colouration process. This stage consumes significant amounts of chemicals and energy (Roth et al.,
5687 2023).

5688 *Coating and laminating*

5689 Coating and laminating involve applying a thin, flexible polymeric film directly to the fabric's surface. The
5690 primary technologies employed are roller, spray, and slot die coating. Adding a polymer coating introduces new
5691 features to the fabric, such as resistance to dust, liquids, and gases. It can also enhance inherent physical
5692 properties, like the fabric's ability to resist abrasion. This stage, too, is chemically and energy-intensive (Roth et
5693 al., 2023).

5694 **10.2.5 Confectioning**

5695 **Figure 48.** Confectioning process



5696

5697 *Source: own production and adapted from (McKinsey & Company, 2022), icons from www.flaticon.com*

5698 Confectioning is the production stage encompassing product design, fabric cutting, and final product assembly.
5699 It is the most manual phase in the production process (Nayak and Padhye, 2018). The fabric spreading and
5700 cutting stage is particularly energy-intensive and can be carried out using either mechanised (operator-assisted)
5701 or digitalised (automated) machines. The assembly phase is predominantly manual and labour-intensive,
5702 involving processes like sewing and culminating in ironing, which is also energy intensive.

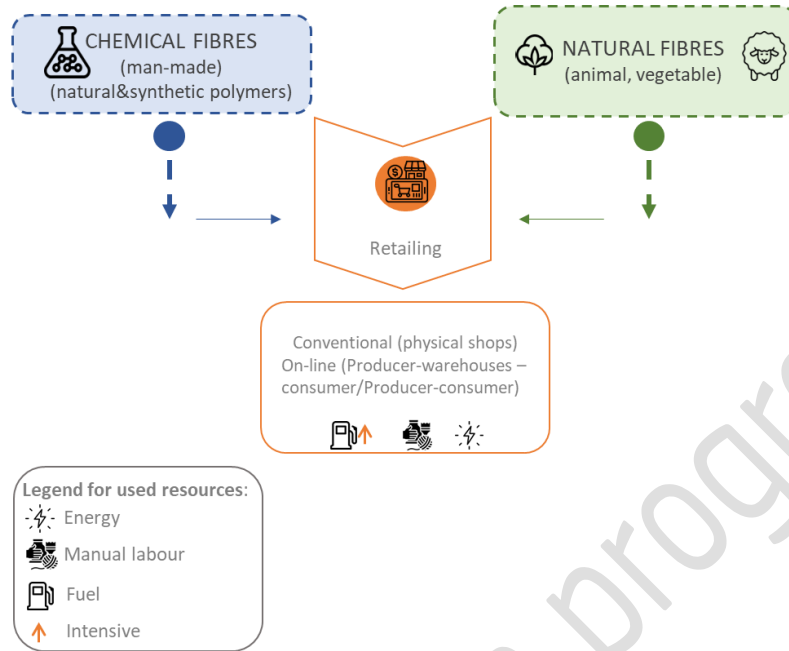
5703 In the final product manufacturing phase, the quality of the sewing process, combined with the sewing stitch
5704 and yarn count, significantly affects a product's seam strength, a key durability parameter. The type and count
5705 of the yarn play a crucial role in determining a textile product's longevity (Yassen, 2017) (Jankoska and
5706 Demboski, 2017).

5707 This is the stage that produces post-industrial waste. By automating and digitalising the design and cutting
5708 stages, waste quantities can be reduced (de Mattos et al., 2022).

5709 **10.2.6 Retailing**

5710

Figure 49. Textile products retailing



5711

5712

Source: own production adapted from (McKinsey & Company, 2022), icons from www.flaticon.com

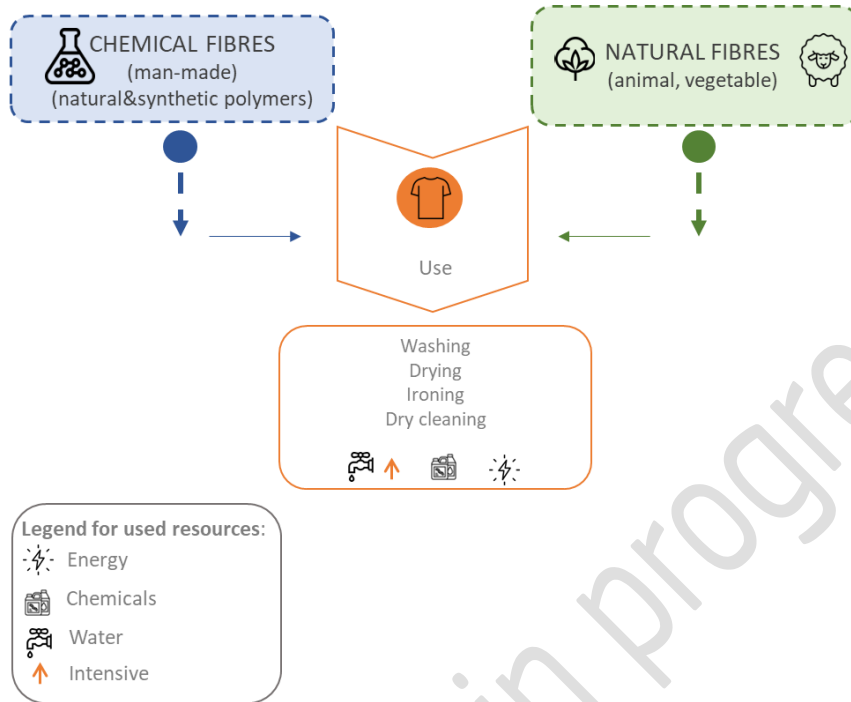
5713 Retail, defined by the Oxford dictionary as ‘the activity of selling goods to the public in shops, on the internet,
5714 etc.’ (Oxford dictionary, 2023), encompasses the transportation of final products and their sale through various
5715 channels (European Commission, 2023). The journey typically involves:

- 5716 — Moving goods from the production network (manufacturers) to the export network (trade firms),
5717 and finally to the marketing networks (retailers) (de Mattos et al., 2022).
- 5718 — Using various means of transport, including road, sea, rail, air, or a combination of these
5719 (multimodal transportation).

5720 The primary resources used in this stage include fuel for transport, which leads to emissions, as well as labour
5721 and energy for sales operations. This stage produces pre-consumer waste. To reduce such waste, strategies like
5722 production on demand and integrated management systems for efficient inventory management can be
5723 employed (Aslan et al., 2015) (de Mattos et al., 2022) (Alyssa Hardy, 2020).

5725

Figure 50. Use phase of a textile product



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5727

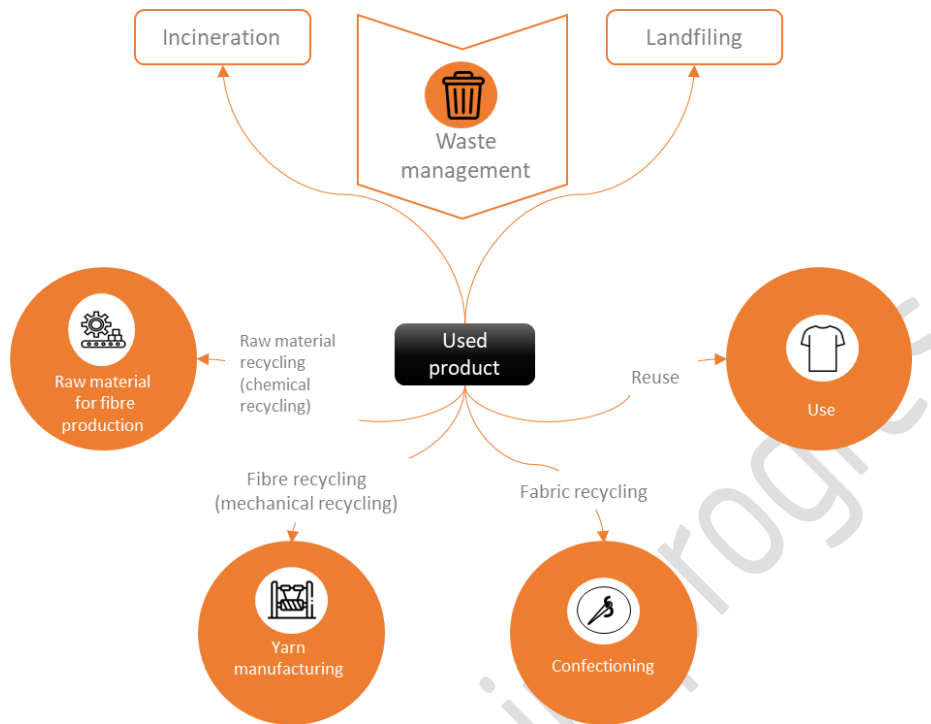
Source: own production and adapted from (McKinsey & Company, 2022), icons from www.flaticon.com

5728 The 'use' phase of a textile product encompasses activities such as washing, cleaning, drying, ironing, and
 5729 steaming (Quantis, 2022). The specific requirements for these activities depend on the product and are detailed
 5730 in its care label.

5731 This stage primarily consumes water and chemicals, with energy-intensive processes like ironing and steaming
 5732 following closely. The physical durability of a textile product hinges on both the user's adherence to the care
 5733 label instructions and the product's inherent characteristics.

5734 **10.2.8 Waste management**

5735 **Figure 51. Textile products waste management**



5736

5737 *Source: own production and adapted from (McKinsey & Company, 2022), icons from www.flaticon.com*

5738 Most disposed textile apparel, at the end of their life, are either incinerated or sent to landfills. This process not
 5739 only generates waste and emissions into the environment, but it is also energy intensive. Such discarded textiles,
 5740 primarily consisting of clothing and home textiles, account for about 85% of total textile waste (McKinsey &
 5741 Company, 2022). Currently, this follows a linear model. However, the energy recovered from incineration can
 5742 be repurposed for other applications. The calorific value of textile waste is estimated to be between 3 599 and
 5743 5 200 MJ/Kg (Vargas and Yuleimy Ramírez, 2014) (Mustia et al., 2021).

5744 Transitioning from this linear model to a circular one involves collecting, sorting, and pre-processing discarded
 5745 textiles for fibre-to-fibre recycling. Textile waste management avenues include preparation for reuse, fabric
 5746 recycling, fibre recycling (mechanical recycling), and raw material recycling (chemical recycling). Currently, only
 5747 30-35% of textiles are collected, with a significant portion of unsorted waste exported outside Europe (McKinsey
 5748 & Company, 2022).

5749 Textile recycling technologies fall into three main categories (Jørgensen et al., 2022):

5750 **Fibre or Mechanical Recycling:** This method uses physical processes and can be applied to all textile waste
 5751 types. It can also precede other recycling methods like thermo-mechanical, chemical, or biochemical (DG
 5752 GROW, 2021b).

5753 **Raw Material or Chemical Recycling:** This involves chemical processes to recycle monomers or polymers,
 5754 suitable for materials like cotton, PA6, or PET (DG GROW, 2021b).

5755 **Thermal Recycling:** This method uses heat. Thermo-mechanical recycling melts polymers, mainly for
 5756 thermoplastic textiles like polyester, while thermo-chemical recycling breaks down polymers into base
 5757 components, which can then be repurposed (DG GROW, 2021b; McKinsey & Company, 2022).

5758 Additionally, **fabric recycling** involves refurbishing or remanufacturing discarded textiles, resulting in recycled
 5759 products.

5760 The primary solution to the current textile waste issue is recycling, coupled with waste reduction efforts (DG
 5761 GROW, 2021b; McKinsey & Company, 2022).

5762 **10.3 Supporting information about tests and standards in the textile industry**

5763 **Table 66.** Working Groups with the involvement of several scientific committees in CEN/ TC 248.

Working Group	Topic
CEN/TC248/SC1	Burning behaviour of textiles, textile products and textile containing products
CEN/TC248/SC2	Physical properties
CEN/TC248/SC3	Chemical properties
CEN/TC248/WG 10	Size system of clothing
CEN/TC248/WG 11	Monofilaments
CEN/TC248/WG 12	Physical testing of knitted fabrics and garments
CEN/TC248/WG 13	Determination of resistance of textiles to microbiological attack
CEN/TC248/WG 14	UV protective properties
CEN/TC248/WG 15	Multifilament yarns
CEN/TC248/WG 16	Textiles in the healthcare system
CEN/TC248/WG 17	Hygienic quality of textiles proposed in industrial laundries and used in sectors it is necessary to control biocontamination
CEN/TC248/WG 18	AZO dyestuffs- Detection of certain aromatic amines
CEN/TC248/WG 19	Characterization of fibres
CEN/TC248/WG 20	Safety of children's clothing
CEN/TC248/WG 21	Terry towels
CEN/TC248/WG 22	Elasticity of fabrics
CEN/TC248/WG 23	Burning behaviour of nightwear
CEN/TC248/WG 24	Test methods for the flammability of textiles
CEN/TC248/WG 25	Cosmeto-textiles
CEN/TC248/WG 26	Methods of test for phthalates
CEN/TC248/WG 27	Determination of fibre proof properties of fabrics
CEN/TC248/WG 28	Thermoregulation
CEN/TC248/WG 29	Specifications and test methods for silk articles
CEN/TC248/WG 3	Ropes and agricultural twines and fishing nets
CEN/TC248/WG 30	Quantitative analysis of fibre mixtures
CEN/TC248/WG 31	Smart Textiles
CEN/TC248/WG 32	Organic, green and ecotextiles
CEN/TC248/WG 33	Labelling of superfine wool
CEN/TC248/WG 34	Joint Working Group between CEN/TC248 and CEN/TC 252 Risks in the sleeping environment
CEN/TC248/WG 35	Slide (zip) Fasteners
CEN/TC248/WG 36	Classification of textiles and textile products based on burning behaviour
CEN/TC248/WG 37	Microplastics from textile sources
CEN/TC248/WG 38	Circular Textiles Chain- Requirements and categories
CEN/TC248 WG 39	Circular Economy for textile products and textile chain. This group is under development
CEN/TC248/WG 4	Coated fabrics
CEN/TC248/WG 5	Touch and close fasteners
CEN/TC248/WG 6	Sewing threads
CEN/TC248/WG 7	Cabinet roller towels
CEN/TC248/WG 8	Upholstery fabrics
CEN/TC248/WG 9	Prioritization of research topics
CEN/TC38/WG 35	Environmental aspects
ISO/TC173/SC/WG2	Urinary absorbing aids

Source: CEN official website (¹⁸⁹)

5764

5765

5766 **Table 67.** Working Groups and subcommittees involved in ISO/TC 38.

Working Group	Topic
ISO ISO/TC 38/SC 1	Tests for coloured textiles and colorants
ISO/TC 38/SC 2	Cleansing, finishing and water resistance tests
ISO/TC 38/SC 20	Fabric descriptions
ISO/TC 38/SC 23	Fibres and yarns
ISO/TC 38/SC 24	Conditioning atmospheres and physical tests for textile fabrics
ISO/TC 38/CAG	Chair's Advisory Group
ISO/TC 38/WG 9	Nonwovens

¹⁸⁹ CEN Technical Committee Working Groups available at [this link](#)

Working Group	Topic
ISO/TC 38/WG 17	Physiological properties of textiles
ISO/TC 38/WG 21	Ropes, cordage, slings and netting
ISO/TC 38/WG 22	Composition and chemical testing
ISO/TC 38/WG 23	Biological properties of textiles
ISO/TC 38/WG 27	Fabric properties relating to moisture
ISO/TC 38/WG 30	Tests for Biodegradability
ISO/TC 38/WG 31	Non-fibrous bio-based material for textiles
ISO/TC 38/WG 32	Smart textiles
ISO/TC 38/WG 33	Animal welfare in the textile supply chain
ISO/TC 38/WG 34	Microplastics from textile sources
ISO/TC 38/WG 35	Environmental aspects
ISO/TC 38/WG 36	Activated carbon fibre

5767

5768 All standards reported in this section include tests on a specific sample of the final product.

5769

DRAFT - work in progress

5770 **Table 68.** Standards directly related to intrinsic durability

Specific topic	ID code	Title	Type	Status
Abrasion	ISO 12945-1:2020	Determination of fabric propensity to surface pilling, fuzzing or matting — Part 1: Pilling box method	Standard	Published
Abrasion	ISO 12945-2:2020	Determination of fabric propensity to surface pilling, fuzzing or matting — Part 2: Modified Martindale method	Standard	Published
Pilling and abrasion	ISO 12945-3:2020	Determination of fabric propensity to surface pilling, fuzzing or matting — Part 3: Random tumble pilling method	Standard	Published
Pilling and abrasion	ISO 12945-4:2020	Determination of fabric propensity to surface pilling, fuzzing or matting — Part 4: Assessment of pilling, fuzzing and matting by visual analysis	Standard	Published
Colour fastness	EN ISO 105-A06:1995	Textiles — Tests for colour fastness — Part A06: Instrumental determination of 1/1 standard depth of colour	Standard	Published
Colour fastness	EN ISO 105-B01:2014	Textiles — Tests for colour fastness — Part B01: Colour fastness to light: Daylight	Standard	Published
Colour fastness	EN ISO 105-B02:2014	Textiles — Tests for colour fastness — Part B02: Colour fastness to artificial light: Xenon arc fading lamp test	Standard	Published
Colour fastness	EN ISO 105-B03:2014	Textiles — Tests for colour fastness — Part B03: Colour fastness to weathering: Outdoor exposure	Standard	Published
Colour fastness	ISO 105-C06:2010	Tests for colour fastness — Part C06: Colour fastness to domestic and commercial laundering	Standard	Published
Colour fastness	EN ISO 105-C12:2010	Textiles — Tests for colour fastness — Part C12: Colour fastness to industrial laundering	Standard	Published
Colour fastness	EN ISO 105-D01:2010	Textiles — Tests for colour fastness — Part D01: Colour fastness to drycleaning using perchloroethylene solvent	Standard	Published
Colour fastness	EN ISO 105-E01:2013	Textiles – tests for colour fastness – part E01: colour fastness to water	Standard	Published
Colour fastness	EN ISO 105-E02:2013	Textiles – tests for colour fastness – part E02: colour fastness to sea water	Standard	Published
Colour fastness	EN ISO 105-E03:2010	Textiles – tests for colour fastness – part E03: colour fastness to chlorinated water (swimming-pool water)	Standard	Published
Colour fastness	EN ISO 105-E04:2013	Textiles – tests for colour fastness – part E04: colour fastness to perspiration	Standard	Published
Colour fastness	EN ISO 105-E07:2010	Textiles – tests for colour fastness – part E07: colour fastness to spotting: water	Standard	Published
Colour fastness	EN ISO 105-N01:1993	Textiles – tests for colour fastness – part N01: colour fastness to bleaching: hypochlorite	Standard	Published
Colour fastness	EN ISO 105-N02:1995	Textiles – tests for colour fastness – part N02: colour fastness to bleaching: peroxide	Standard	Published
Colour fastness	EN ISO 105-N03:1995	Texti4484les – tests for colour fastness – part N03: colour fastness to bleaching: sodium chlorite (mild)	Standard	Published
Colour fastness	EN ISO 105-N04:1995	Textiles – tests for colour fastness – part N04: colour fastness to bleaching: sodium chlorite (severe)	Standard	Published
Colour fastness	EN ISO 105-X11:1994	Textiles — Tests for colour fastness — Part X11: Colour fastness to hot pressing	Standard	Published

Specific topic	ID code	Title	Type	Status
Colour fastness	EN ISO 105-X12:2016	Textiles — Tests for colour fastness — Part X12: Colour fastness to rubbing	Standard	Published
Abrasion resistance on coated fabric	ISO 5470-1:2016	Rubber- or plastics-coated fabrics — Determination of abrasion resistance — Part 1: Taber abrader	Standard	Published
Abrasion resistance on coated fabric	ISO 5470-2:2016	Rubber- or plastics-coated fabrics — Determination of abrasion resistance — Part 2: Martindale abrader	Standard	Published
Abrasion resistance on fabric	ISO 12947-2:2016	Textiles — Determination of the abrasion resistance of fabrics by the Martindale method — Part 2: Determination of specimen breakdown	Standard	Published
Abrasion resistance on fabric	ISO 12947-3:2016	Textiles — Determination of the abrasion resistance of fabrics by the Martindale method — Part 3: Determination of mass loss	Standard	Published
Abrasion resistance on fabric	ISO 12947-4:2016	Textiles — Determination of the abrasion resistance of fabrics by the Martindale method — Part 4: Assessment of appearance change	Standard	Published
Abrasion resistance on fabric	ASTM D3884-22	Standard Guide for Abrasion Resistance of Textile Fabrics (Rotary Platform Abrader Method)	Standard	Published
Abrasion resistance on fabric	ASTM D3885 -07A-19	Standard Test Method for Abrasion Resistance of Textile Fabrics (Flexing and Abrasion Method) (woven or nonwoven fabric)	Standard	Published
Abrasion resistance on fabric	ASTM D3886-22	Standard Test Method for Abrasion Resistance of Textile Fabrics (Inflated Diaphragm Apparatus) (both wet and dry/conditioned samples)	Standard	Published
Abrasion resistance on fabric	ASTM D4966-22	Standard Test Method for Abrasion Resistance of Textile Fabrics (Martindale Abrasion Tester Method)	Standard	Published
Abrasion resistance on fabric	ASTM D4158-08-20	Standard Guide for Abrasion Resistance of Textile Fabrics (Uniform Abrasion)	Standard	Published
Antifungal activity (Functional durability)	ISO 13629-1:2012	Textiles — Determination of antifungal activity of textile products — Part 1: Luminescence method	Standard	Published
Antifungal activity (Functional durability)	ISO 13629-2:2014	Textiles — Determination of antifungal activity of textile products — Part 2: Plate count method	Standard	Published
Antiviral activity (Functional durability)	ISO 18184:2019	Textiles — Determination of antiviral activity of textile products	Standard	Published
Appearance	ISO/TR 16323:2003	Textiles — Three-dimensional measuring apparatus for fabric appearance	Standard	Published
Bursting strength	EN ISO 13938-1:2019	Textiles: Bursting properties of fabrics. Part 1: Hydraulic method for determination of bursting strength and bursting distension	Standard	Published
Bursting strength	ISO 13938-2:2019	Textiles: Bursting properties of fabrics. Part 2: Pneumatic method for determination of bursting strength and bursting distension	Standard	Published
Bursting strength	ISO 9073-3:2023	Nonwovens — Test methods Part 3: Determination of tensile strength and elongation at break using the strip method	Standard	Published
Bursting strength	ISO 9073-4:2021	Nonwovens — Test methods Part 4: Determination of tear resistance by the trapezoid procedure	Standard	Published
Bursting strength	ISO 9073-5:2008	Textiles — Test methods for nonwovens — Part 5: Determination of resistance to mechanical penetration (ball burst procedure)	Standard	
Bursting strength	ASTM D3786/D3786M-18	Standard test method for bursting strength of textile fabrics. Diaphragm bursting strength tester method. Hydraulic or pneumatic diaphragm bursting tester	Standard	Published
Bursting strength	ASTM D3787-16	Standard test method for bursting strength of textile fabrics. The constant rate of traverse (CRT) Ball burst test	Standard	Published

Specific topic	ID code	Title	Type	Status
Bursting strength	ASTM D6797-15	Standard test method for bursting strength of textiles. The constant rate of extension (CRT) Ball burst test	Standard	Published
Colour fastness	BVL B 82.10-1:2011-12	Analysis of commodity goods - Testing of coloured children's toys with respect to their resistance to saliva and perspiration	Standard	Published
Colour fastness	DIN 53160-1:2010-10	Determination of the colourfastness of articles for common use. Part 1 Test with artificial saliva	Standard	Published
Colour fastness	DIN 53160-2:2010-10	Determination of the colourfastness of articles for common use. Part 2 Test with artificial sweat	Standard	Published
Colour fastness	ISO/TR 12116:2008	Textiles — Methods of simulating colour change during actual wear by means of laboratory colour-fastness tests	Standard	Published
Colour fastness	Oeko-Tex Standard 100. Class 1	Colour fastness to saliva and perspiration for children 3 years to younger	Ecolabel	Published
Colour fastness	AATCC8 – 2016e	Test method for colour fastness to crocking	Test method	Published
Colour fastness	AATCC15 -2021e	Test method for colour fastness to perspiration	Standard	Published
Colour fastness	AATCC16 – 2004e	Test method for colour fastness to light	Standard	Published
Crease retention	ISO 7769:2009	Textiles — Test method for assessing the appearance of creases in fabrics after cleansing	Standard	Published
Crease retention	ISO 2313-1:2021	Textiles — Determination of the recovery from creasing of a folded specimen of fabric by measuring the angle of recovery — Part 1: Method of the horizontally folded specimen	Standard	Published
Crease retention	ISO 2313-2:2021	Textiles — Determination of the recovery from creasing of a folded specimen of fabric by measuring the angle of recovery — Part 2: Method of the vertically folded specimen	Standard	Published
Crease retention	AATCC test method 128-2017e	Test Method for wrinkle recovery of fabrics: appearance	Standard	Published. Not approved by ANSI
Crease retention	AATCC test method 66 – 2017e	Test Method for wrinkle recovery of woven fabrics: recovery angle	Standard	Published. Not approved by ANSI
Dimensional stability	ISO 5077:2007	Textiles — Determination of dimensional change in washing and drying	Standard	Published
Dimensional stability	ISO 3005:1978	Textiles — Determination of dimensional change of fabrics induced by free-steam	Standard	Published
Dimensional stability	ISO 7771:1985	Textiles — Determination of dimensional changes of fabrics induced by cold-water immersion	Standard	Published
Dimensional stability	ISO 16322-2:2021	Determination of spirality after laundering- Part 2 Woven and knitted fabrics	Standard	Published
Dimensional stability	ISO 675:2014	Textiles — Woven fabrics — Determination of dimensional change on commercial laundering near the boiling point	Standard	Published
Dimensional stability	ISO 9866-1:1991	Textiles — Effect of dry heat on fabrics under low pressure — Part 1: Procedure for dry-heat treatment of fabrics	Standard	Published
Dimensional stability	ISO 9866-2:1991	Textiles — Effect of dry heat on fabrics under low pressure — Part 2: Determination of dimensional change in fabrics exposed to dry heat	Standard	Published
Dimensional stability	ISO 21765:2020	Textiles — Determination of fabric deformability by forced mechanical distension	Standard	Published

Specific topic	ID code	Title	Type	Status
Dimensional stability	ISO 23231:2008	Textiles — Determination of dimensional change of fabrics — Accelerated machine method	Standard	Published
Dimensional stability (connected standard)	EN ISO 3759:2011	Textiles - Preparation, marking and measuring of fabric specimens and garments in tests for determination of dimensional change	Standard	Published
Dimensional stability (connected standard)	EN ISO 6330:2012	Domestic washing and drying procedures for textile testing	Standard	Published
Dimensional stability (connected standard)	EN ISO 15797:2018	Industrial washing and finishing procedures for testing of workwear	Standard	Published
Dimensional stability (connected standard)	ISO 3175-2:2017	Professional care, drycleaning and wet cleaning of fabrics and garments - Part 2: Procedure for testing performance when cleaning and finishing using tetrachloroethene	Standard	Published
Dimensional stability (connected standard)	ISO 3175-3:2017	Professional care, drycleaning and wet cleaning of fabrics and garments - Part 3: Procedure for testing performance when cleaning and finishing using hydrocarbon solvents	Standard	Published
Dimensional stability (connected standard)	ISO 3175-4:2017	Professional care, drycleaning and wet cleaning of fabrics and garments - Part 4: Procedure for testing performance when cleaning and finishing using simulated wet cleaning	Standard	Published
Easy-Care treatments (functional durability)	ISO 7768:2009	Textiles — Test method for assessing the smoothness appearance of fabrics after cleansing	Standard	Published
Flame retardancy (Functional durability)	ISO 12138:2017	Textiles — Domestic laundering procedures for textile fabrics prior to flammability testing	Standard	Published
Flame retardancy (Functional durability)	BS5651:1978	Method for cleansing procedure for use in the assessment of the effect of cleansing and wetting on the flammability of textile fabrics and fabric assemblies	Standard	Published
Loss of fibre fragments from textiles	AATCC TM212 – 2021e	Fibre fragment release during home laundering	Standard	Published
Loss of fibre fragments from textiles	ISO 4484	Textile and textile products- Microplastics from textile sources. Part1: Determination of material loss from fabrics during washing	Standard	Published
Loss of fibre fragments from textiles	ISO 4484-1:2023	Textile and textile products- Microplastics from textile sources. Part1: Determination of material loss from fabrics during washing	Standard	Published
Loss of fibre fragments from textiles	ISO 4484-2:2023	Textile and textile products- Microplastics from textile sources. Part 2: Qualitative and quantitative analysis of microplastics	Standard	Published
Loss of fibre fragments from textiles	ISO 4484-3	Textile and textile products- Microplastics from textile sources. Part 3: Measurement of collected material mass released from textile end products by domestic washing method	Standard	Published
Matting appearance after cleansing	ISO 16847:2016	Textiles — Test method for assessing the matting appearance of napped fabrics after cleansing	Standard	Published
Antibacterial activity	ISO 20743:2021	Textiles — Determination of antibacterial activity of textile products.	Standard	Published
Oil stain repellency (Functional durability)	ISO 14419:2010	Textiles - Oil repellency - Hydrocarbon resistance test	Standard	Published
Performance requirements	ASTM D5432-12- 19	Standard Performance specification for blanket products for institutional and household use	Standard	Published
Performance requirements	ASTM D411-12 – 19	Standard Performance specification for woven napery and tablecloth fabrics: household and institutional	Standard	Published
Performance requirements	ASTM D5433-12 – 19	Standard Performance specification for towel products for institutional and household use	Standard	Published

Specific topic	ID code	Title	Type	Status
Performance requirements	EN 13569:2001	Cabinet roller towels- Performance requirements and processing	Standard	Published
Performance requirements	EN 14697:2005	Textiles. Terry towels and terry towel fabrics. Specifications and methods for tests sets out requirements based on general applicated test methods	Standard	Published
Physiological comfort (Thermal resistance and Breathability (post-laundering) in PEFCR)	JIS L 1099 – 2021e	Textiles — Physiological effects — Measurement of thermal and water-vapour resistance under steady-state conditions (sweating guarded-hotplate test)	Standard	Published
Physiological comfort (Thermal resistance and Breathability (post-laundering) in PEFCR) (Functional property claims)	ISO 11092:2015	Textiles — Physiological effects — Measurement of thermal and water-vapour resistance under steady-state conditions (sweating guarded-hotplate test)	Standard	Published
Quality of buttons and press fasteners	CEN/TS 17394	Textiles and textile products.	Standard	Published
Quality of buttons and press fasteners	CEN/TS 17394-1:2021	Textiles and textile products – Part 1: Safety of children's clothing – Security of attachment of attached components to infants' clothing – Specification.	Standard	Published
Quality of buttons and press fasteners	CEN/TS 17394-2:2021	Textiles and textile products. Part 2: Safety of Children's clothing security of attachment of buttons. Test method	Standard	Published
Quality of buttons and press fasteners	CEN/TS 17394-3:2021	Textiles and textile products. Part 3: Safety of Children's clothing security of attachment of metal mechanically applied press fasteners. Test method	Standard	Published
Quality of zippers	ASTM D2061-07 (2021)	Standard test methods for strength test for zippers	Standard	Published
Quality of zippers	JIS S3015 – 2019e	Methods for measuring zipper dimensions standard test methods for strength	Standard	Published
Quality of zippers	EN 16732:2016	Slide fasteners (zips) Specifications	Standard	Published
Resistance to chlorinated water	ISO 17608:2015	Textiles — Bare elastane yarns — Determination of resistance to chlorinated water (swimming-pool water)	Standard	Published
Resistance to insect	ISO 3998:1977	Textiles — Determination of resistance to certain insect pests	Standard	Published
Resistance to surface wetting (Functional Durability)	ISO 9865:1991	Textiles - Determination of water repellency of fabrics by the Bundesmann rain-shower test	Standard	Published
Resistance to surface wetting (Thermal resistance and breathability (post-laundering) in PEFCR) (Functional property claims)	ISO 15496:2018	Textiles — Measurement of water vapour permeability of textiles for the purpose of quality control	Standard	Published
Seam slippage (wovens only)	ISO 13936-1:2004	Textiles — Determination of the slippage resistance of yarns at a seam in woven fabrics — Part 1: Fixed seam opening method	Standard	Published
Seam slippage (wovens only)	ISO 13936-2:2004	Textiles — Determination of the slippage resistance of yarns at a seam in woven fabrics — Part 2: Fixed load method	Standard	Published
Seam slippage (wovens only)	ISO 13936-3:2004	Textiles — Determination of the slippage resistance of yarns at a seam in woven fabrics — Part 3: Needle clamp method	Standard	Published
Seam slippage (wovens-only)	ASTM D4035/4034M-19	Standard test method for resistance to yarn slippage at the sewn seam in woven upholstery fabrics	Standard	Published
Seam smoothness	ISO 7770:2009	Textiles — Test method for assessing the smoothness appearance of seams in fabrics after cleansing	Standard	Published
Seam strength	EN-ISO 13935	Textiles — Seam tensile properties of fabrics and made-up textile articles	Standard	Published

Specific topic	ID code	Title	Type	Status
Seam strength	EN-ISO 13935-1:2014	Textiles — Seam tensile properties of fabrics and made-up textile articles — Part 1: Determination of maximum force to seam rupture using the strip method	Standard	Published
Seam strength	EN-ISO 13935-2:2014	Textiles — Seam tensile properties of fabrics and made-up textile articles — Part 2: Determination of maximum force to seam rupture using the grab method	Standard	Published
Seam strength	ASTM D1683-22	Standard test method for failure in sewn seams of woven fabrics	Standard	Published
Seam strength	ASTM D751-19	Standard test method for coated fabrics	Standard	Published
Spirality	ISO 16322-1:2005	Textiles — Determination of spirality after laundering — Part 1: Percentage of wale spirality change in knitted garments	Standard	Published
Spirality	ISO 16322-3:2021	Textiles — Determination of spirality after laundering — Part 3: Woven and knitted garments	Standard	Published
Stain Repellency (Functional durability)	ISO 22958:2021	Textiles — Water resistance — Rain tests: exposure to a horizontal water spray	Standard	Published
Stretch and recovery	ISO 20932-1:2018	Textiles — Determination of the elasticity of fabrics — Part 1: Strip tests	Standard	Published
Stretch and recovery	ISO 20932-2:2018	Textiles — Determination of the elasticity of fabrics — Part 2: Multiaxial tests	Standard	Published
Stretch and recovery	ISO 20932-3:2018	Textiles — Determination of the elasticity of fabrics — Part 3: Narrow fabrics	Standard	Published
Tear Strength	EN ISO 4674-1:2017	Rubber or plastic-coated fabrics- Determination of tear resistance- Part 1: constant rate of tear methods	Standard	Published
Tear Strength	EN-ISO 13937-1:2000	Textiles — Tear properties of fabrics — Part 1: Determination of tear force using ballistic pendulum method (Elmendorf)	Standard	Published
Tear Strength	EN-ISO 13937-2:2000	Textiles — Tear properties of fabrics — Part 2: Determination of tear force of trouser-shaped test specimens (Single tear method)	Standard	Published
Tear Strength	EN-ISO 13937-3:2000	Textiles — Tear properties of fabrics — Part 3: Determination of tear force of wing-shaped test specimens (Single tear method)	Standard	Published
Tear Strength	EN-ISO 13937-4:2000	Textiles — Tear properties of fabrics — Part 4: Determination of tear force of tongue-shaped test specimens (Double tear test)	Standard	Published
Tear Strength	ASTM D1424-21	Standard Test Method for Tearing Strength of Fabrics by falling-pendulum (Elmendorf-Type) apparatus	Standard	Published
Tensile strength and elongation (durability parameter according to OVAM report [3])	ISO 9073-3:1989	Textiles — Test methods for nonwovens — Part 3: Determination of tensile strength and elongation	Standard	Published
Tear Strength	ISO 9073-4:2021	Nonwovens — Test methods — Part 4: Determination of tear resistance by the trapezoid procedure	Standard	Published
Tear Strength	ISO 9073-18:2007	Textiles — Test methods for nonwovens — Part 18: Determination of breaking strength and elongation of nonwoven materials using the grab tensile test	Standard	Published
Tensile strength and elongation (durability parameter according to OVAM report [3])	ISO/FDIS 9073-3	Nonwovens — Test methods — Part 3: Determination of tensile strength and elongation at break using the strip method	DIS	Under development
Tear Strength	ASTM D5587 -15-19	Standard Test Method for Tearing Strength of Fabrics by trapezoid procedure apparatus	Standard	Published

Specific topic	ID code	Title	Type	Status
Tear Strength	ASTM D2261 -13-17	Standard Test method for Tearing Strength of fabric by the tongue (single rip) procedure (constant rate of extension tensile testing machine)	Standard	Published
Tear Resistance	ASTM D2582-21	Standard Test Method for Puncture-Propagation Tear Resistance of Plastic Film and Thin Sheeting	Standard	Published
Tensile strength (durability parameter according to OVAM report [3])	EN-ISO 13934-1:2013	Textiles: Tensile properties of Fabrics Part 1 Determination of maximum force and elongation at maximum force using the strip method	Standard	Published
Tensile strength (durability parameter according to OVAM report [3])	EN-ISO 13934-2:2014	Textiles: Tensile properties of Fabrics. Part 2 Determination of maximum force using the grab method	Standard	Published
Tensile strength and elongation	ASTM D5035-11	Standard test method for breaking force and elongation of textile fabrics (strip method)	Standard	Published
Tensile strength and elongation	ASTM D5034-21	Standard test method for breaking force and elongation of textile fabrics (grab method)	Standard	Published
Tensile strength and elongation	EN ISO 1421 (2016)	Rubber or plastic-coated fabrics - Determination of tensile strength and elongation at break	Standard	Published
Unevenness of textile	ISO 16549:2021	Unevenness of textile strands. Capacitance method	Standard	Published
Visible change after washing	ISO 15487:2018	Textiles — Method for assessing appearance of apparel and other textile end products after domestic washing and drying	standard	Published
Water repellency (Functional Durability)	ISO 4920:2012	Textile fabrics — Determination of resistance to surface wetting (spray test)	Standard	Published
Water resistance after aging	EN 343:2019	Rain Protection	Standard	Published
Wicking (Functional durability)	AATCC 197-2022e	Test method for vertical wicking rate of textiles to specified distances	Standard	NA
Wrinkle resistance	ISO 9867:2022	Textiles — Evaluation of the wrinkle recovery of fabrics — Appearance method	Standard	Published

5771 Standards made of several parts and only the most used are reported in this Table: ¹Made of 4 parts. ²Made of 107 parts. ³Made of 2 parts. ⁴Made of 7 parts. ⁵Made of 2 parts. ⁶Made of 2 parts. ⁷Made of 20 parts. ⁸Made of 3 parts. ⁹Made of 2 parts. ¹⁰Made of 3 parts. ¹¹Made of 2 parts. ¹²Made of 6 parts. ¹³Made of 3 parts. ¹⁴Made of 2 parts. ¹⁵Made of 3 parts. ¹⁶Made of 2 parts. ¹⁷Made of 3 parts. ¹⁸Made of 4 parts. ¹⁹Made of 2 parts. ²⁰Made of 5 parts. ²¹Made of 20 parts. ²²It is made of 2 parts.

5773 Every ID Code indicates the year depending on the Standard reference, as follows:

- 5774
- 5775 • ISO/CEN/BVL/BS -> XXX:YEAR (4-DIGIT)
 - 5776 • ASTM ->XXX-YEAR (2-DIGIT)
 - 5777 • AATC/JIS -> XXX-YEARe (4-DIGIT)

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5779 **Table 69.** Standards used by several frameworks to test parameters related to durability of textile products

Parameter	PEFCR A&F	EU Ecolabel	Nordic Ecolabel	Blue Angel
Resistance to pilling and abrasion	ISO 12945-1 (Pilling box method)	ISO 12945-1 Pill box method (Knitted and non-woven products)	ISO 12947-2 Martindale abrasion (Woven fabrics)	ISO 12945-1 Pill box method (Knitted and non-woven products)
	ISO 12947-2 Martindale abrasion (Woven and knitted products) and EN 13770 for knitted footwear garments, ASTM D3939 for snagging resistance and BS 8479 for propensity to snagging	ISO 12945-2 Martindale method (Woven fabrics)		ISO 12945-2 Martindale method (Woven fabrics)

Parameter	PEFCR A&F	EU Ecolabel	Nordic Ecolabel	Blue Angel
Colour fastness to dry rubbing	NA	ISO 105 X12		
Colour fastness to wet rub (Crocking)	NA	ISO 105 X12		
Colour fastness to perspiration	NA	ISO 105 E04 (Acid alkaline)	ISO 105 E04 (Acid alkaline) ISO 105 A06 (saliva)	ISO 105 E04 (acid and alkaline, comparison with multi-fibre fabric)
Colour fastness to light exposure	ISO 105-B02 Xenon arc fading lamp test	ISO 105-B02		
Colour fastness to washing	NA	ISO 105 C06 (Domestic washing) ISO 15797 combined with ISO 105 C06 (Commercial washing)	ISO 105 C06 ISO 105 D01 if dry cleaning	ISO 105 C06 (single wash, at temperature marked on the product, with perborate powder)
Colour fastness to water	ISO 105-E02 for sea water ISO 105-E03 for chlorinated water	NA		
Water repellency	Bundesmann ISO 9865 or ISO 4920	NA	ISO 6330 combined with ISO 4920 (Domestic)	
			ISO 15797 combined with ISO 4920 (Industrial washing)	
			ISO 6330 and ISO 5077	
Garment Integrity Test after washing	ISO 6330	ISO 6330 in combination with EN ISO 5077 (Domestic washing) ISO 15797 in combination with EN ISO 5077 (Industrial washing)		
Garment Integrity Test after dryclean	ISO 3175-2 to 3175-4	NA		
Oil repellency	NA	ISO 6330 (Domestic) ISO 15797 (Industrial) both in combination with ISO 14419	NA	
Soil or stain Release	NA	ISO 6330 (Domestic) ISO 15797 (Industrial) both in combination with ISO 22958	NA	
Flame retardant functions	NA	ISO 6330 in combination with ISO 12138 (Domestic)	NA	ISO 6330 in combination with ISO 12138 (Domestic)
		ISO 10528 in combination with ISO 12138 (Industrial)		ISO 10528 in combination with ISO 12138 (Industrial)
Easy care function	NA	ISO 7768	NA	ISO 7768
Garment Dimensional Stability Shrinkage & Skew/Twist/Torque	ISO 6330 indications of 5 cycles for machine wash and dry indications.	ISO 6330 combined with ISO 4920 (Domestic)	NA	
	ISO 3175-2 to 3175-4 if dry-clean indications of 3 cycles and ironing after final cycle.	ISO 15797 combined with ISO 4920 (Industrial washing)		
	ISO 5077 and ISO 16322-3 spirality			
Appearance	ISO 15487 with specific conditions for domestic and professional cleaning	NA		
Bursting	ISO 139381 (or-2)	NA		

Parameter	PEFCR A&F	EU Ecolabel	Nordic Ecolabel	Blue Angel
Seam slippage	ISO 13936-2 (Woven fabrics)	NA	ISO 13936-1 o ISO 13936-2 (Woven fabrics)	NA
Fabric Tear Strength	ISO 13937-1	NA	ISO 13937-1 applied on outer fabric not include any inner lining in the product	NA
Fabric Tensile Strength	ISO 13934-2	NA	ISO 13934-2	NA
Seam strength	NA		ISO 13935-2 (Woven fabrics)	NA
Product waterproofness	ISO 811	NA		
Insulation	ISO11092 RCT	NA		
Elasticity of fabrics	ISO 20932-1 and ISO 20932-3	NA		

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- (a) PEFCR A&F: Product Environmental Footprint Category Rules (PEFCR): apparel and footwear;
(b) EU Ecolabel criteria for textile products. Commission Decision (2014/350/EU).
(c) Blue Angel – The German Ecolabel: DE-UZ 154 Basic Award Criteria. Edition January 2023, version 2.
(d) Nordic Swan Ecolabel: Textiles, hides/skins, and leather. Version 5.4.

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Source: own elaboration

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Table 70. Standards related to the functionality of the textile product

Specific topic	ID code	Title	Type	Status
Soil or stain release (Functional durability)	AATCC 130-18T, 2018	Washing Procedure selection to match care label	Standard	Published
Waterproofness	ISO 811:2018	Textiles — Determination of resistance to water penetration — Hydrostatic pressure test	standard	Published
Water penetration	ISO 18695:2007	Textiles — Determination of resistance to water penetration — Impact penetration test	Standard	Published
Water adsorption	ISO 18696:2006	Textiles — Determination of resistance to water absorption — Tumble-jar absorption test	Standard	Published
Moisturising effect	ISO 21232:2018	Textiles — Determination of moisturizing effect of textile materials by measurement of microclimate between textiles and simulated human skin using sweating guarded hotplate	Standard	Published
Hygroscopic heat generation	ISO 18782:2015	Textiles — Determination of dynamic hygroscopic heat generation	Standard	Published
Aqueous stain resistance	ISO 23232:2009	Textiles — Aqueous liquid repellency — Water/alcohol solution resistance test	Standard	Published
Thermal resistance	ISO 5085-1:1989	Textiles — Determination of thermal resistance — Part 1: Low thermal resistance	Standard	Published
Thermal resistance	ISO 5085-2:1990	Textiles — Determination of thermal resistance — Part 2: High thermal resistance	Standard	Published
Fire hazard reduction	ISO/TR 9240:1992	Textiles — Design of apparel for reduced fire hazard	Standard	Published
Superhydrophobic characteristics and durability assessment	ISO/CD TS 10818	Nanotechnologies — Textiles containing nanomaterials and nanostructures — Superhydrophobic characteristics and durability assessment	Technical Specifications	Under development
Resistance of cellulose-containing textiles to micro-organisms	ISO 11721-1:2001	Textiles — Determination of resistance of cellulose-containing textiles to micro-organisms — Soil burial test — Part 1: Assessment of rot-retardant finishing	Standard	Published

Specific topic	ID code	Title	Type	Status
Resistance of cellulose-containing textiles to micro-organisms	ISO 11721-2:2003	Textiles — Determination of the resistance of cellulose-containing textiles to micro-organisms — Soil burial test — Part 2: Identification of long-term resistance of a rot retardant finish	Standard	Published
Resistance of cellulose-containing textiles to micro-organisms	ISO 11737-3:2023	Sterilization of health care products — Microbiological methods — Part 3: Bacterial endotoxin testing	Standard	Published
Antifungal activity	ISO 13629-1:2012	Textiles — Determination of antifungal activity of textile products — Part 1: Luminescence method	Standard	Published
Antifungal activity	ISO 13629-2:2014	Textiles — Determination of antifungal activity of textile products — Part 2: Plate count method	Standard	Published
Exothermic and endothermic properties	ISO 16533:2014	Textiles — Measurement of exothermic and endothermic properties of textiles under humidity change	Standard	Published
Deodorant properties	ISO 17299-1:2014	Textiles — Determination of deodorant property — Part 1: General principle	Standard	Published
Deodorant properties	ISO 17299-2:2014	Textiles — Determination of deodorant property — Part 2: Detector tube method	Standard	Published
Deodorant properties	ISO 17299-3:2014	Textiles — Determination of deodorant property — Part 3: Gas chromatography method	Standard	Published
Deodorant properties	ISO 17299-4:2015	Textiles — Determination of deodorant property — Part 4: Condensation sampling analysis	Standard	Published
Deodorant properties	ISO 17299-5:2015	Textiles — Determination of deodorant property — Part 5: Metal-oxide semiconductor sensor method	Standard	Published
Moisture drying rate	ISO 17617:2014	Textiles — Determination of moisture drying rate	Standard	Published
Odour management	ISO 20645:2004	Textile fabrics — Determination of antibacterial activity — Agar diffusion plate test	Standard	Published
Total heat transfer	ISO 20852:2020	Textiles — Determination of the total heat transfer through textiles in simulated environments	Standard	Published
Dust mite resistance	ISO 21326:2019	Textiles — Test methods for determining the efficiency of products against house dust mite	Standard	Published
Burning behaviour	ISO 6940:2004	Textile fabrics — Burning behaviour — Determination of ease of ignition of vertically oriented specimens	Standard	Published
Burning behaviour	ISO 6941:2003	Textile fabrics — Burning behaviour — Measurement of flame spread properties of vertically oriented specimens	Standard	Published
Burning behaviour	ISO 10047:1993	Textiles — Determination of surface burning time of fabrics	Standard	Published
Adsorption	ISO 9073-6:2000	Textiles — Test methods for nonwovens — Part 6: Absorption	Standard	Published
Flexural rigidity	ISO 9073-7:1995	Textiles — Test methods for nonwovens — Part 7: Determination of bending length	Standard	Published
Liquid strike-through time	ISO 9073-8:1995	Textiles — Test methods for nonwovens — Part 8: Determination of liquid strike-through time (simulated urine)	Standard	Published
Drapability	ISO 9073-9:2008	Textiles — Test methods for nonwovens — Part 9: Determination of drapability including drape coefficient	Standard	Published
Lint and particle generation	ISO 9073-10:2003	Textiles — Test methods for nonwovens — Part 10: Lint and other particles generation in the dry state	Standard	Published
Run-off of liquids	ISO 9073-11:2002	Textiles — Test methods for nonwovens — Part 11: Run-off	Standard	Published

Specific topic	ID code	Title	Type	Status
Absorbency of fabric (wettability)	ISO 9073-12:2002	Textiles — Test methods for nonwovens — Part 12: Demand absorbency	Standard	Published
Liquid strike-through time	ISO 9073-13:2006	Textiles — Test methods for nonwovens — Part 13: Repeated liquid strike-through time	Standard	Published
Air permeability	ISO 9073-15:2007	Textiles — Test methods for nonwovens — Part 15: Determination of air permeability	Standard	Published
Resistance to penetration by water	ISO 9073-16:2007	Textiles — Test methods for nonwovens — Part 16: Determination of resistance to penetration by water (hydrostatic pressure)	Standard	Published
Water penetration	ISO 9073-17:2008	Textiles — Test methods for nonwovens — Part 17: Determination of water penetration (spray impact)	Standard	Published
Biodegradability	ISO 21701:2019	Textiles — Test method for accelerated hydrolysis of textile materials and biodegradation under controlled composting conditions of the resulting hydrolysate	Standard	Published
Air permeability	ISO 9237:1995	Textiles — Determination of the permeability of fabrics to air	Standard	Published
Electrostatic property	ISO 18080-1:2015	Textiles — Test methods for evaluating the electrostatic propensity of fabrics — Part 1: Test method using corona charging	Standard	Published
Electrostatic property	ISO 18080-2:2015	Textiles — Test methods for evaluating the electrostatic propensity of fabrics — Part 2: Test method using rotary mechanical friction	Standard	Published
Electrostatic property	ISO 18080-3:2015	Textiles — Test methods for evaluating the electrostatic propensity of fabrics — Part 3: Test method using manual friction	Standard	Published
Electrostatic property	ISO 18080-4:2015	Textiles — Test methods for evaluating the electrostatic propensity of fabrics — Part 4: Test method using horizontal mechanical friction	Standard	Published
Distortion of woven fabric	ISO 13015:2013	Woven fabrics — Distortion — Determination of skew and bow	Standard	Published
Max force and elongation at max force	ISO 24281:2021	Textiles — Biaxial tensile properties of woven fabric — Determination of maximum force and elongation at maximum force using the grab method	Standard	Published
Fire hazard reduction	ISO 12952-1:2010	Textiles — Assessment of the ignitability of bedding items — Part 1: Ignition source: smouldering cigarette	Standard	Published
Fire hazard reduction	ISO 12952-2:2010	Textiles — Assessment of the ignitability of bedding items — Part 2: Ignition source: match-flame equivalent	Standard	Published
Drying rate	ISO 13029:2012	Textiles — Determination of drying rate in dynamic state by the modified sweating-guarded hotplate	Standard	Published
Reduction activity of specific proteins	ISO 4333:2022	Textiles — Determination of reduction activity of specific proteins derived from pollen, mite and other sources on textile products	Standard	Published

Standards made of several parts and only the most used are reported in this Table: ¹ Made of 2 parts. ² Made of 2 parts. ³ Made of 2 parts. ⁴ Made of 5 parts. ⁵ Made of 20 parts. ⁶ Made of 4 parts. ⁷ Made of 2 parts. Every ID Code indicates the year depending on the Standard reference, as follows:

- ISO -> XXX:YEAR (4-DIGIT)
- AATC -> XXX-YEARe (4-DIGIT)

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5792 **Table 71.** Standards used for textile characterization

Specific topic	ID code	Title	Type	Status
Mass per unit length and mass per unit area	ISO 3801:1977	Textiles — Woven fabrics — Determination of mass per unit length and mass per unit area	Standard	Published
Mass per unit length and mass per unit area	EN 12127:1998	Textiles. Fabrics. Determination of mass per unit area using small samples.	Standard	Published
Width and length	ISO 22198:2006	Textiles — Fabrics — Determination of width and length	Standard	Published
Colorimetric communication	ISO 10617:2010	Textiles — Standard data format for colorimetric communication — Textiles and related measurements	Standard	Published
Dyestuff identification	ISO 16373-1:2015	Textiles — Dyestuffs — Part 1: General principles of testing coloured textiles for dyestuff identification	Standard	Published
Fibre identification	ISO 18074:2015	Textiles — Identification of some animal fibres by DNA analysis method — Cashmere, wool, yak and their blends	Standard	Published
Fibre identification	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	Standard	Published
Thickness	ISO 5084:1996	Textiles — Determination of thickness of textiles and textile products	Standard	Published
Mass per unit area	ISO 9073-1:1989	Textiles — Test methods for nonwovens — Part 1: Determination of mass per unit area	Standard	Published
Thickness	ISO 9073-2:1995	Textiles — Test methods for nonwovens — Part 2: Determination of thickness	Standard	Published
Composition	ISO/TR 11827:2012	Textiles — Composition testing — Identification of fibres	Technical Report	Published

5793 Standards made of several parts and only the most used are reported in this Table: ¹ Made of 3 parts. ² Made of 20 parts.

5794 Every ID Code indicates the year depending on the Standard reference, as follows:

- 5795
- ISO/EN -> XXX:YEAR (4-DIGIT)

5796

5797 **Table 72.** Standards for the determination of specific substances

Specific topic	ID code	Title	Type	Status
Alkylphenol ethoxylates (APEO)	ISO 18254-1:2016	Textiles — Method for the detection and determination of alkylphenol ethoxylates (APEO) — Part 1: Method using HPLC-MS	Standard	Published
Alkylphenol ethoxylates (APEO)	ISO 18254-2:2016	Textiles — Method for the detection and determination of alkylphenol ethoxylates (APEO) — Part 2: Method using NPLC	Standard	Published
Formaldehyde	ISO 141842	Textiles — Determination of formaldehyde	Standard	Published
Formaldehyde	ISO 14184-1:2011	Textiles — Determination of formaldehyde — Part 1: Free and hydrolysed formaldehyde (water extraction method)	Standard	Published
Formaldehyde	ISO 14184-2:2011	Textiles — Determination of formaldehyde — Part 2: Released formaldehyde (vapour absorption method)	Standard	Published
Formaldehyde	ISO/CD 14184	Textiles — Determination of formaldehyde	CD	Under development
Formaldehyde	ISO/CD 14184-3	Textiles — Determination of formaldehyde — Part 3: Free and hydrolysed formaldehyde (extraction method) —Determination by high pressure liquid chromatography	CD	Under development

Specific topic	ID code	Title	Type	Status
Phthalate	ISO 14389:2022	Textiles — Determination of the phthalate content — Tetrahydrofuran method	Standard	Published
Phthalate	EN ISO 18856:2004	Water quality- Determination of selected phthalates using gas chromatography/mass spectrometry	Standard	Published
Phthalate	EN 14602:2012	Footwear- Test methods for the assessment of ecological criteria	Standard	Published
Organotin compounds	EN ISO 17353:2007	Water quality- Determination of selected organotin compounds- Gas chromatographic method	Standard	Published
Aromatic amines derived from azo colorants	ISO 14362-1:2017	Textiles — Methods for determination of certain aromatic amines derived from azo colorants — Part 1: Detection of the use of certain azo colorants accessible with and without extracting the fibres	Standard	Published
Organotin compounds	ISO 22744-1:2020	Textiles and textile products — Determination of organotin compounds — Part 1: Derivatisation method using gas chromatography	Standard	Published
Organotin compounds	ISO 22744-2:2020	Textiles and textile products — Determination of organotin compounds — Part 2: Direct method using liquid chromatography	Standard	Published
Aromatic amines derived from azo colorants	ISO 143625	Textiles — Methods for determination of certain aromatic amines derived from azo colorants	Standard	Published
Aromatic amines derived from azo colorants	ISO 14362-3:2017	Textiles — Methods for determination of certain aromatic amines derived from azo colorants — Part 3: Detection of the use of certain azo colorants, which may release 4-aminoazobenzene	Standard	Published
Detection of disperse dyestuff	DIN 54231:2022	Textiles- Determination of dyes after methanol extraction	Standard	Published
Chlorinated benzenes and toluenes	UNE-EN 17137:2019	Textiles - Determination of the content of compounds based on chlorobenzenes and chlorotoluenes	Standard	Published
Determination of extractable metals	EN ISO 105-E04:2013	Textiles – tests for colour fastness – part E04: colour fastness to perspiration	Standard	Published
Determination of extractable metals	DIN 542337	Testing of Textiles- Determination of metals.	Standard	Published
Determination of extractable metals	UNE-EN 16711-2:2016	Textiles - Determination of metal content - Part 2: Determination of metals extracted by acidic artificial perspiration solution	Standard	Published
Determination of extractable metals	DIN EN 16711-2:2016	Textiles- Determination of metal content- Part 2: Determination of metals extracted by acidic artificial perspiration solution	Standard	Published
Determination of extractable metals	DIN 38405-24:1987-05	German standard methods for the examination of water, wastewater and sludge: anions (group D); photometric determination of chromium (VI) using 1,5-diphenylcarbonohydrazide (D24)	Standard	Published
Determination of the metallic composition	EN12472-2020	Method for the simulation of the accelerated wear and corrosion for the detection of nickel release from coated items	Standard	Published
Determination of the metallic composition	ISO 1811-1:1998	Copper and copper alloys- Selection and preparation of samples for chemical analysis. Part1: sampling of cast unwrought products	Standard	Published
Determination of chlorophenols	EN ISO 17070:2015	Leather- Chemical test- Determination of tetra chlorophenol, trichlorophenol content	Standard	Published
Determination of chlorophenols	EN 17134-2:2023	Textiles and textile products - Determination of biocide additives - Part 2: Chlorophenol-based preservatives, method using gas chromatography	Standard	Published
Dyestuff identification	ISO 16373-2:2014	Textiles — Dyestuffs — Part 2: General method for the determination of extractable dyestuffs including allergenic and carcinogenic dyestuffs (method using pyridine-water)	Standard	Published

Specific topic	ID code	Title	Type	Status
Dyestuff identification	ISO 16373-3:2014	Textiles — Dyestuffs — Part 3: Method for determination of certain carcinogenic dyestuffs (method using triethylamine/methanol)	Standard	Published
Flame retardance	ISO 17881-1:2016	Textiles — Determination of certain flame retardants — Part 1: Brominated flame retardants	Standard	Published
Flame retardance	ISO 17881-2:2016	Textiles — Determination of certain flame retardants — Part 2: Phosphorus flame retardants	Standard	Published
Flame retardance	ISO/TR 17881-3:2018	Textiles — Determination of certain flame retardants — Part 3: Chlorinated paraffin flame retardants	Standard	Published
Index ingredients	ISO 22195:11	Textiles — Determination of index ingredient from coloured textiles	Standard	Published
Index ingredients	ISO 22195-1:2020	Textiles — Determination of index ingredient from coloured textiles — Part 1: Madder	Standard	Published
Index ingredients	ISO 22195-2:2020	Textiles — Determination of index ingredient from coloured textiles — Part 2: Turmeric	Standard	Published
Index ingredients	ISO 22195-3:2023	Textiles — Determination of index ingredient from coloured textile — Part 3: Myrobalan	Standard	Published
Index ingredients	ISO 22195-4:2021	Textiles — Determination of index ingredient from coloured textile — Part 4: Catechu	Standard	Published
Index ingredients	ISO 22195-5:2021	Textiles — Determination of index ingredient from coloured textile — Part 5: Lac	Standard	Published
Index ingredients	ISO 22195-6:2021	Textiles — Determination of index ingredient from coloured textile — Part 6: Punica granatum	Standard	Published
Many substances	CEN/TR 16741:2015	Textiles and textile products - Guidance on health and environmental issues related to chemical content of textile products intended for clothing, interior textiles and upholstery	Technical Report	Published

5798 Standards made of several parts and only the most used are reported in this Table: ¹ Made of 2 parts. ² made of 2 parts. ³ Made of 2 parts. ⁴ Made of 2 parts. ⁵ made of 2 parts. ⁶ Made of 107 parts. ⁷ Made of 2 parts. ⁸ Made of 3 parts. ⁹ Made of 3 parts. ¹⁰ Made of 3 parts. ¹¹ Made of 6 parts.

5799 Every ID Code indicates the year depending on the Standard reference, as follows:

- 5800 • ISO/DIN/CEN -> XXX:YEAR (4-DIGIT)

5801

5802

5803 **Table 73.** Standards related to loss of fibre fragments from textiles

Specific topic	ID code	Title	Type	Status
Loss of fibre fragments from textiles	ISO 4484-1	Textile and textile products- Microplastics from textile sources. Part1: Determination of material loss from fabrics during washing	Standard	Published
Loss of fibre fragments from textiles	ISO 4484-2	Textile and textile products- Microplastics from textile sources. Part 2: Qualitative and quantitative analysis of microplastics	Standard	Published
Loss of fibre fragments from textiles	ISO 4484-3	Textile and textile products- Microplastics from textile sources. Part 3: Measurement of collected material mass released from textile end products by domestic washing method	Standard	Published

5804 Standards made of several parts and only the most used are reported in this Table: ¹ Made of 3 parts.

5805 Every ID Code indicates the year depending on the Standard reference, as follows:

5806

- ISO -> XXX:YEAR (4-DIGIT)

5807

5808 **Table 74** Standards and Technical Specifications potentially related to circularity and environmental aspects

Broader topic	Specific topic	ID code	Title	Type	Status
Definitions	Environmental aspects	ISO 5157:2023 ISO TC 38	Textiles — Environmental aspects — Vocabulary	Standard	Published
Circularity	Principles of circularity	Unknown developed by CEN TC 248 WG 39	Textiles - Circular economy for textile products - General principles and guidance	Technical Specifications	Under development
Circularity	Material use	Unknown developed by CEN TC 248 WG 39	Textiles - Circular economy for textile products – Categorisation of and requirements on non-virgin input materials	Technical Specifications	Under development
Circularity	Design for circularity	Unknown developed by CEN TC 248 WG 39	Textiles - Circular economy for textile products - design for circularity	Technical Specifications	Under development
Environmental claims	Terminology of Environmental claims	CEN/TS 16822:2015	Textiles and textile products - Self-declared environmental claims - Use of the terms	Technical Specifications	Published

5809

5810 **Table 75.** Standards related to topics not covered by **Table 68** to **Table 74**

Broader topic	Specific topic	ID code	Title	Type	Status
Definitions	Definitions of natural fibres	EN ISO 6938:2014	Textiles — Natural fibres — Generic names and definitions	Standard	Published
Definitions	Environmental aspects	ISO 5157:2023 ISO TC 38	Textiles — Environmental aspects — Vocabulary	Standard	Published
Definitions	Stitch types	ISO 4915:1991	Textiles — Stitch types — Classification and terminology	Standard	Published
Definitions	Seam types	ISO 4916:1992	Textiles — Seam types — Classification and terminology	Standard	Published
Definitions	Determination of mass	ISO 6348:1980	Textiles — Determination of mass — Vocabulary	Standard	Published
Definitions	Woven fabric	ISO 2959:2011	Textiles — Woven fabric descriptions	Standard	Published
Definitions	Weaves	ISO 3572:1976	Textiles — Weaves — Definitions of general terms and basic weaves	Standard	Published
Definitions	Knitted fabrics	ISO 8388:1998	Knitted fabrics — Types — Vocabulary	Standard	Published
Definitions	Description of defects	ISO 8498:1990	Woven fabrics — Description of defects — Vocabulary	Standard	Published
Definitions	Description of defects	ISO 8499:2003	Knitted fabrics — Description of defects — Vocabulary	Standard	Published
Definitions	Nonwoven	ISO 9092:2019	Nonwovens — Vocabulary	Standard	Published
Definitions	Nonwoven	ISO 11224:2003	Textiles — Web formation and bonding in nonwovens — Vocabulary	Standard	Published
Definitions	Superfine woven wool	ISO 18103:2015	Superfine woven wool fabric labelling — Requirements for Super S code definition	Standard	Published
Definitions	Man-made fibres	ISO 2076:2021	Textiles — Man-made fibres — Generic names	Standard	Published
Labelling	Labelling	ISO 3758:2012	Textiles — Care labelling code using symbols	Standard	Published
Labelling	Symbols on workwear	ISO 30023:2021	Textiles — Qualification symbols for labelling workwear to be industrially laundered	Standard	Published

Broader topic	Specific topic	ID code	Title	Type	Status
Circularity	Principles of circularity	Unknown developed by CEN TC 248 WG 39	Textiles - Circular economy for textile products - General principles and guidance	Standard	Under development
Circularity	Material use	Unknown developed by CEN TC 248 WG 40	Textiles - Circular economy for textile products – Categorisation of and requirements on non-virgin input materials	Standard	Under development
Circularity	Design for circularity	Unknown developed by CEN TC 248 WG 41	Textiles - Circular economy for textile products - design for circularity	Standard	Under development
Environmental claims	Terminology of Environmental claims	CEN/TS 16822:2015	Textiles and textile products - Self-declared environmental claims - Use of the terms	Technical Specifications	Published

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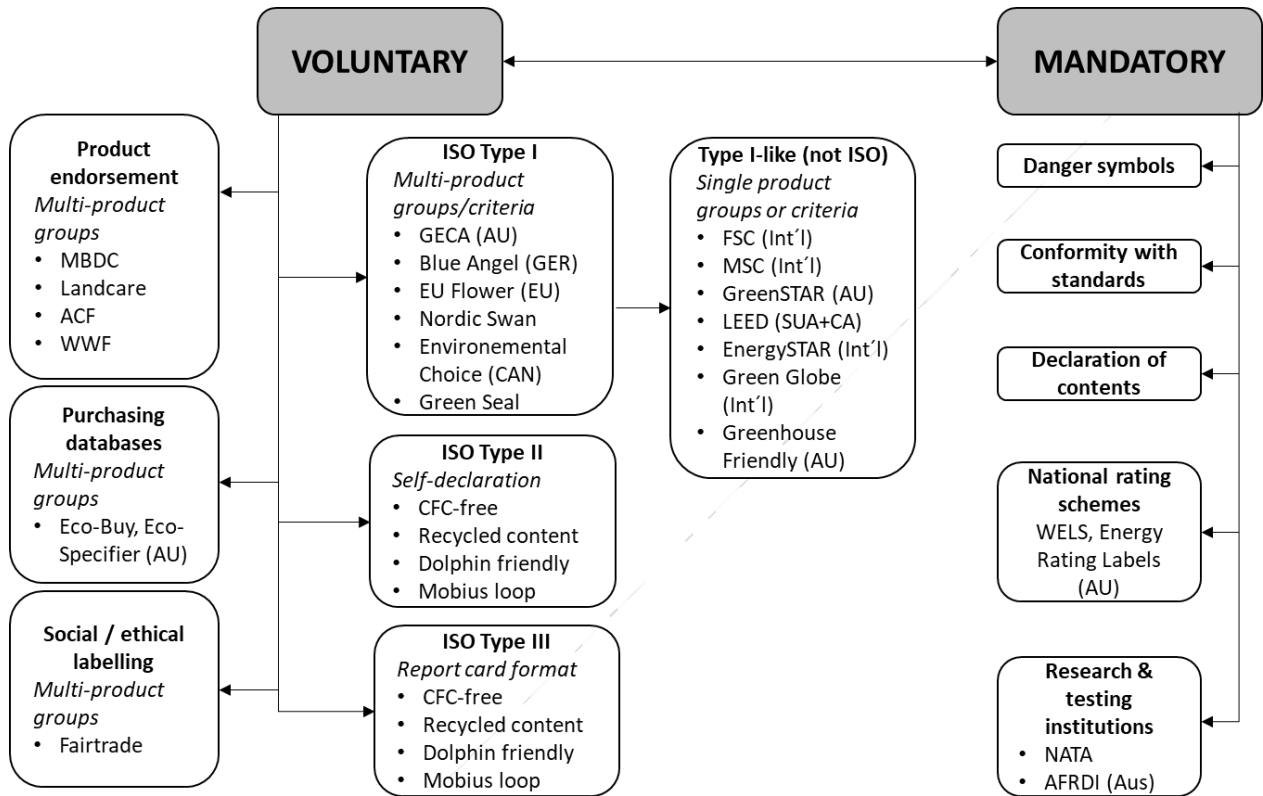
Every ID Code indicates the year depending on the Standard reference, as follows:
ISO/CEN -> XXX:YEAR (4-DIGIT)

5814 **10.4 Supporting information about environmental labels**

5815 **10.4.1 Types of labels in general**

5816 There are many types of labels, addressing single or multiple environmental issues and covering different
 5817 sectors and regions. **Figure 52** shows the taxonomy of labels, which includes mandatory and voluntary
 5818 frameworks (Frydendal et al., 2018).

5819 **Figure 52.** Taxonomy of labels for communication of specific product information



5820
 5821 *Source: (Frydendal et al., 2018)*

5822 The Ecolabel Index ⁽¹⁹⁰⁾ is known to be the largest global directory of labels related to environmental and social
 5823 aspects. On 12 January 2024, it counted 456 labels in 199 countries, and 25 industry sectors. Due to the high
 5824 number and types of voluntary environmental labels, the International Organization for Standardization (ISO)
 5825 established specific guidelines.

5826 **ISO Type I environmental labels** (ISO 14024:2018) ⁽¹⁹¹⁾, known as **Ecolabels**, are defined as ‘voluntary,
 5827 multi-criteria-based and third party-verified labels that indicate an overall environmental preference in a life
 5828 cycle perspective of a product or service within a specific product category’. Ecolabels are a subset of the
 5829 environmental labels that recognise a better environmental performance of a given product or service related
 5830 to other products in the same product group. An Ecolabel must fulfil the following nine requirements (Frydendal
 5831 et al., 2018):

- 5832 1. It is built on the life cycle thinking;

¹⁹⁰ Ecolabel Index. Website available at [this link](#). Last accessed on 12 January 2024.

¹⁹¹ ISO 14024:2018. Environmental labels and declarations. Type I environmental labelling. Principles and procedures. Available at [this link](#). Last accessed on 12 January 2024.

- 5833 2. It is based on multiple criteria, therefore it addresses many environmental impact categories, such as
5834 global warming, eutrophication, etc.;
- 5835 3. Criteria are justified by sound scientific and engineering reasons. Their objectivity is ensured by the
5836 involvement of a broad range of stakeholders (industries, consumers, governments, etc...) during the
5837 process of criteria development;
- 5838 4. It comprises requirements related to functional aspects of the product (fitness for use). This
5839 characteristic guarantees a sufficient quality of labelled products and services;
- 5840 5. Criteria are continuously updated according to changes affecting the labelled products. These changes
5841 could be related to technologies, the regulatory context and other aspects;
- 5842 6. All stages of criteria development are transparent;
- 5843 7. It is accessible to all potential applicants;
- 5844 8. It involves third-party certification;
- 5845 9. There is compliance monitoring after the licence is awarded.

5846 **ISO Type II environmental labels** (ISO 14021:2016) ⁽¹⁹²⁾, known as **Self-declared Environmental Claims**,
5847 are neither third-party verified, nor based on Life Cycle Thinking approach. Many self-declared environmental
5848 claims on the EU market do not necessarily follow the ISO 14021:2016.

5849 **ISO Type III environmental labels** (ISO 14025:2016) ⁽¹⁹³⁾, known as **Environmental Declarations**, are
5850 labels presenting *quantified environmental information on the life cycle of a product to enable comparisons*
5851 *between products fulfilling the same function*. The Environmental Declarations were mainly envisioned for
5852 business-to-business communication, but their use in business-to-consumer communication is not precluded.
5853 The establishment of Product Category Rules ensures that the life cycle assessment is performed with specific
5854 rules aiming to foster transparency and facilitate comparisons between different Environmental Declarations.
5855 The EC promotes the establishment of commonly recognised Product Environmental Footprint Category Rules
5856 (PEFCRs) ⁽¹⁹⁴⁾. As any life cycle assessment, the Environmental Declarations are third-party verified.

5857 10.4.2 Voluntary environmental labels used in EU

5858 Table 76

5859 **Table 76.** Environmental labels used in 2021 in Europe: ISO type and addressed topics

Ecolabel	Criteria	ISO TYPE
AnbefaltToxic	other	NA
Better Cotton Initiative	Biodiversity, chemicals, natural resources, pesticides/herbicides/fungicides, soil, wastewater/sewage, water quality, water use, other	NA
Blue Angel	Carbon/GHG emission, Energy use/efficiency, forests, natural resources, recycling, toxics, waste water/sewage, water quality, water use, other	Type I ¹⁹⁵
bluesign® standard	Carbon/GHG emission, Carbon/GHG offsets, chemicals, energy production/source, energy use/efficiency, material use, natural resources, pesticides/herbicides/fungicides, recycling, toxics, waste, wastewater/sewage, water quality, water use	NA
Carbon Reduction Label	Carbon/GHG emission	NA
Climatop	Animal welfare, biodiversity, Carbon/GHG emission, chemicals, energy production/sources, energy use/efficiency, forests, GMOs, material use, natural resources, pesticides/herbicides/fungicides, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	NA
Compostability Mark of European Bioplastics	Chemicals, Material use, Natural resources, pesticides/herbicides/fungicides, recycling, toxics, waste, water quality	NA

¹⁹² ISO 14021:2016. Environmental labels and declarations. Self-declared environmental claims (Type II environmental labelling). Available at [this link](#). Last accessed on 12 January 2024.

¹⁹³ ISO 14025:2006. Environmental labels and declarations. Type III environmental declarations. Principles and procedures. Available at [this link](#). Last accessed on 12 January 2024.

¹⁹⁴ European platform on LCA | EPLCA. Environmental footprint. Available at [this link](#). Last accessed on 12 January 2024.

¹⁹⁵ Blue Angel – The German Ecolabel: DE-UZ 154 Basic Award Criteria. Edition January 2023, version 2. Available at [this link](#). Last accessed on 12 January 2024.

Ecolabel	Criteria	ISO TYPE
Coop Naturline:Switzerland	Biodiversity, chemicals, GMOs, natural resources, pesticides/herbicides/fungicides, soil, toxics, wastewater/sewage	NA
Cradle to Cradle Certified (CM) Products Program	Chemicals, energy production/source, energy use/efficiency, forests, material use, natural resources, recycling, toxics, waste, wastewater/sewage, water quality, water use	NA
Danish Indoor Climate Label	Other (emission to indoor air)	NA
ECOLOGO	Animal welfare, biodiversity, Carbon/GHG emissions, Carbon/GHG offsets, Chemicals, energy production/sources, energy use/efficiency, forests, GMOs, material use, natural resources, pesticides/herbicides/fungicides, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	Type I ¹⁹⁶
Ekologicky setrny vyrobek/Environmentally Friendly Product	Carbon/GHG emission, Carbon/GHG offsets, chemicals, energy production/sources, energy use/efficiency, material use, natural resources, pesticides/herbicides/fungicides, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	Type I **
Environmental product declaration (EPD)	Carbon/GHG emission, Carbon/GHG offsets, chemicals, energy production/source, energy use/efficiency, material use, natural resources, recycling, toxics, waste, water quality, water use	Type III ¹⁹⁷
EU Ecolabel	Chemicals, energy use/efficiency, forests, material use, natural resources, recycling, toxics, waste, wastewater/sewage, water quality, water use	Type I ¹⁹⁸
Fair for life	Animal welfare, biodiversity, Carbon/GHG emissions, energy use/efficiency, GMOs, natural resources, pesticides/herbicides/fungicides, soil, water use	NA
Fairtrade	Biodiversity, energy use/efficiency, forests, GMOs, natural resources, pesticides/herbicides/fungicides, soil, toxics, waste, water use	Type II***
Global Organic Textile Standard	Chemicals, GMOs, Material use, natural resources, pesticides/herbicides/fungicides, soil, toxics, wastewater/sewage, water quality	NA
Good Environmental choice "Bra Miljoval"	Chemicals, energy production/sources, energy use/efficiency, forests, material use, natural resources, toxics	Type I ¹⁹⁹
Good Shopping Guide Ethical Award	Animal welfare, Carbon/GHG emissions, Carbon/GHG offsets, chemicals, energy production/sources, energy use/efficiency, GMOs, material use, natural resources, pesticides/herbicides/fungicides, recycling, toxics, waste water quality	NA
Good Weave	Other (workplace environmental conditions)	NA
Green Crane: Ukraine	Biodiversity, Carbon/GHG emissions, chemicals, energy production/sources, energy use/efficiency, forests, material use, natural resources, recycling, toxics, waste, wastewater/sewage, water quality, water use	Type I****
Greenguard	Chemicals, toxics	Type II*
Green Shape	Animal welfare, biodiversity, chemicals, energy use/efficiency, GMOs, material use, natural resources, pesticides/herbicides/fungicides, recycling, toxics, waste, wastewater/sewage, water use	NA
GUT	For floor coverings. Chemicals, toxics, other (indoor air quality)	NA
IMO Certified	Fire testing certification. Chemicals, forests, pesticides/herbicides/fungicides, soil, toxics	NA
Label Step	For carpets. Chemicals, wastewater/sewage, water quality	NA
Milieukeur: the Dutch environmental quality label	Animal welfare, biodiversity, Carbon/GHG emissions, chemicals, energy production/sources, energy use/ efficiency, forests, GMOs, material use, natural resources, pesticides/herbicides/fungicides, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	Type I**
National Programme of Environmental Assessment and Ecolabelling in the Slovak Republik (NPEHOV)	Carbon/GHG emissions, chemicals, energy production/sources, energy use/efficiency, forests, material use, natural resources, pesticides/herbicides/fungicides, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	Type I**
Naturland e.V.	Animal welfare, biodiversity, chemicals, forests, GMOs, natural resources, pesticides/herbicides/fungicides, soil, toxics	NA
Nordic Swan Ecolabel	Carbon/GHG emission, chemicals, energy production/sources, energy use/efficiency, material use, natural resources, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	Type I ²⁰⁰

¹⁹⁶ Ecogloballabel website available [here](#)

¹⁹⁷ EPD website available [here](#)

¹⁹⁸ Ecolabel website available [here](#)

¹⁹⁹ Idem

²⁰⁰ Nordic Swan website available [here](#)

Ecolabel	Criteria	ISO TYPE
Oeko-Tex Standard 100	Toxics prohibited by law, chemicals harmful to health	Other Type I-like voluntary sustainable scheme ²⁰¹
OK biobased	Carbon/GHG emission, material use, natural resources, waste	NA
ÖkoControl	Forests, natural resources, pesticides/herbicides/fungicides, toxics	NA
Ølabel: Norway	Chemicals, forests, GMOs, pesticides/herbicides/fungicides, soil	NA
Processed Chlorine Free	Biodiversity, Carbon/GHG emissions, Carbon/GHG offsets, chemicals, energy production/sources, energy use/efficiency, forests, material use, natural resources, pesticides/herbicides/fungicides, recycling, toxics, waste, wastewater/sewage, water quality, water use	NA
SEE What You Are Buying Into	Animal welfare, biodiversity, Carbon/GHG emissions, Carbon/GHG offsets, energy production/sources, energy use/efficiency, GMOs, material use, natural resources, recycling, waste, other	NA
Singapore Green Label Scheme (SGLS)	Animal welfare, biodiversity, Carbon/GHG emission, Carbon/GHG offsets, chemicals, energy production/sources, energy use/efficiency, forests, GMOs, material use, natural resources, pesticides/herbicides/fungicides, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	Type I ²⁰²
Skal Eko Symbol	Pesticides/herbicides/fungicides	NA
SMaRT Consensus Sustainable Product Standards	Animal welfare, biodiversity, Carbon/GHG emissions, Carbon/GHG offsets, Chemicals, energy production/sources, energy use/efficiency, forests, GMOs, material use, natural resources, pesticides/herbicides/fungicides, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	NA
Soil Association Organic Standard	Animal welfare, biodiversity, chemicals, forests, GMOs, natural resources, pesticides/herbicides/fungicides, soil, toxics	NA
SustentaX	Animal welfare, Carbon/GHG emissions, Carbon/GHG offsets, chemicals, energy production/sources, energy uses/efficiency, forests, material use, natural resources, pesticides/herbicides/fungicides, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	NA
Terra Cycle	Carbon/GHG offsets, material use, recycling, waste	NA
Totally Chlorine Free	Biodiversity, Carbon/GHG emissions, Carbon/GHG offsets, chemicals, energy production/sources, energy use/efficiency, forests, GMOS, material use, natural resources, pesticides/herbicides/fungicides, recycling, soil, toxics, waste, wastewater/sewage, water quality, water use	NA
WindMade	Carbon/GHG emission, energy production/sources	NA

5860 The topic of 'Toxics' addresses harmful substances that are already prohibited or regulated; whereas the topic of 'Harmful chemicals'
5861 address substances that are known to be harmful to health, but are not officially banned. N.B. The authors of the referenced study
5862 use the term 'Chemicals' when referring to 'Harmful chemicals'.

5863 The authors of the referenced study do not specify if the topic of 'Waste' addresses any kind of waste generated along the value chain, or
5864 waste generated at a specific stage. No further explanation/specification is provided for other topics.

5865 NA: Not available.

5866 Source: own elaboration based on (Ranasinghe and Jayasooriya, 2021) and the Ecolabel Index⁽²⁰³⁾.
5867 [†](Ranasinghe and Jayasooriya, 2021), ^{**}(LEITAT, 2017), ^{***}(Ziveh and Cinelli, 2023), ^{****}(UNEP, 2023b)

5868

²⁰¹ Ecogloballabel website available [here](#)

²⁰² Idem

²⁰³ Ecolabel Index. Website available at this link. Last accessed on 12 January 2024.

5869 **10.5 Supporting information on market analysis**

5870 **10.5.1 Recycling plants**

5871 **Table 77.** Number of textile recycling plants classified per location

Region	Country	Mechanical				Chemical				Total
		All	Pilot scale	Full scale	Unknown scale	All	Pilot scale	Full scale	Unknown scale	
EU	Austria	0	NA	NA	NA	1	NA	1	NA	1
	Belgium	3	NA	2	1	0	NA	NA	NA	3
	Denmark	3	NA	2	1	1	1	NA	NA	4
	Finland	3	1	2	NA	2	2	NA	NA	5
	France	4	NA	3	1	1	1	NA	NA	5
	Germany	5	NA	5	NA	0	NA	NA	NA	5
	Italy	13	1	9	3	4	1	3	NA	17
	Netherlands	6	2	3	1	1	1	NA	NA	7
	Spain	11	2	9	NA	0	NA	NA	NA	11
Sweden	0	NA	NA	NA	1	NA	1	NA	1	
Europe (Non-EU)	Norway	0	NA	NA	NA	1	NA	1	NA	1
	Switzerland	0	NA	NA	NA	3	1	1	1	3
	UK	1	NA	1	NA	0	NA	NA	NA	1
Middle East	Israel	0	NA	NA	NA	1	NA	1	NA	1
	Türkiye	3	NA	3	NA	0	NA	NA	NA	3
Africa	Mauritius	1	NA	1	NA	0	NA	NA	NA	1
	Morocco	1	NA	1	NA	0	NA	NA	NA	1
Asia	Bangladesh	1	NA	1	NA	0	NA	NA	NA	1
	China	4	1	2	1	5	NA	4	1	9
	India	11	1	7	3	1	NA	NA	1	12
	Indonesia	1	NA	NA	1	1	NA	1	NA	2
	Japan	3	NA	2	1	1	NA	NA	1	4
	Malaysia	1	NA	1	NA	0	NA	NA	NA	1
	Pakistan	3	NA	2	1	0	NA	NA	NA	3
	Singapore	1	NA	NA	1	0	NA	NA	NA	1
	Taiwan	1	NA	1	NA	8	1	6	1	9
Thailand	1	NA	1	NA	0	NA	NA	NA	1	
America	Canada	1	NA	1	NA	1	1	NA	NA	2
	Guatemala	1	NA	1	NA	0	NA	NA	NA	1
	Mexico	1	NA	1	NA	0	NA	NA	NA	1
	USA	5	NA	5	NA	7	4	1	2	12
Oceania	Australia	0	NA	NA	NA	1	NA	1	NA	1

5872 The recycling plants identified were equal to 130. NA: Not available

5873 Source: own elaboration based on Airtable - Sorting for Circularity - Recyclers Database ⁽²⁰⁴⁾, (Jørgensen et al., 2022; Textile Exchange, 2022a)

5875 **Table 78.** Number of textile recycling plants classified per input fibres

Input fibre	Mechanical				Chemical				Total
	Tot	Pilot scale	Full scale	Unknown scale	Tot	Pilot scale	Full scale	Unknown scale	
Cotton	53	4	41	8	17	7	8	2	70
Polyester (PES)	51	2	36	13	26	13	8	5	77
Blends of cotton and PES	14	1	12	1	9	3	5	1	23
Man-Made Cellulosic (MMC)	5	NA	5	NA	5	1	3	1	10
Polyamide (PA)	13	1	10	2	6	NA	5	1	19
Wool	40	5	33	2	0	NA	NA	NA	40
Blends of wool and synthetic fibres	21	NA	17	4	0	NA	NA	NA	21
Acrylic (PAC)	13	1	11	1	0	NA	NA	NA	13
Other plant-based	10	NA	10	NA	1	NA	1	NA	11
Other synthetic	8	NA	7	1	0	NA	NA	NA	8
Other blends	6	NA	5	1	1	NA	1	NA	7

²⁰⁴ Airtable - Sorting for Circularity - Recyclers Database. Available at [this link](#). Last accessed on 31 January 2024.

Input fibre	Mechanical				Chemical				Total
	Tot	Pilot scale	Full scale	Unknown scale	Tot	Pilot scale	Full scale	Unknown scale	
Silk	4	1	3	NA	0	NA	NA	NA	4

5876 Numerous plants could process more than one type of textile fibre.
5877 NA: Not available

5878 Source: own elaboration based on Airtable - Sorting for Circularity - Recyclers Database ⁽²⁰⁵⁾, (Jørgensen et al., 2022; Textile Exchange,
5879 2022a)

5880 10.5.2 Comparison among BREFs

5881 **Table 79.** Environmental performance levels for emission to water by BREFs in the World

Country/organisation Environmental parameter	European Union (EU-BREF)	India (MINAS)	South Korea	United States (US EPA)	World Bank (EHS Guideline)	China
AOX (mg/L)	0.1-0.4	NA	NA	NA	1	30-40 (only for a specific wool treatment)
BOD (mg/L)	No BAT-AEL applies for BOD (**)	30	NA	1.4-35.2 kg/kkg(*) Daily max 0.7-17.6 kg/kkg (*) 30-day avg New 1.4-16.9 kg/kkg (*) Daily max 0.7-8.7 kg/kkg (*) 30-day avg	30	NA
COD (mg/L)	40-100	100	18-30	21.3-256.8 kg/kkg (*)	160	7-30000
Chromium (mg/L)	0.01-0.1	2	0.5	Daily: 0.023-0.22 kg/kkg (*) 30-day average: 0.011-0.11 kg/kkg (*)	0.5	NA
Copper (mg/L)	0.03-0.4	NA	1	NA	0.5	NA
Nickel (mg/L)	0.01-0.1	NA	0.25	NA	0.5	NA
Zinc (mg/L)	0.04-0.5	NA	-	NA	2	NA

5882 (*) Kilograms per 1000 Kilograms. The conversion to milligrams per litre (mg/L) is not straightforward. For enhanced accuracy, it is deemed
5883 more prudent to retain the unit in its original form in accordance with the United States Best Available Technology (BAT) standards.

5884 (**) As an indication, the yearly average BOD5 level in the effluent from a biological wastewater treatment plant will generally be ≤ 10
5885 mg/L.

5886 Source: (OECD, 2022)

²⁰⁵ Airtable - Sorting for Circularity - Recyclers Database. Available at [this link](#). Last accessed on 31 January 2024.

5887

Table 80. Environmental performance levels for emission to water by the Chinese BREF

Process	Fibres	Origin of wastewater	AOX (mg/L)	COD cr Concentration (mg/L)
Processing of raw materials	Hemp	Biological removal	NA	7-3000
		Chemical removal of glue	NA	2000-4000
		Joint removal of glue	NA	1000-3000
	Silk	Boiling cocoon and filament processes	NA	80-400
		Refining: oil removal	NA	20-12000
		Refining: water washing	NA	800-4000
	Wool	Washing	NA	40-9000
		Carbonization (**)	NA	200-400
		Silk-Resistant (***)	30-40	400-600
Chemical fibres	NA	NA	200-600	
Finishing fabrics	Cotton, Hemp & mixed machine fabrics	Slurry removal	NA	30-10000
		Cooking (****)	NA	1000-2000
		Bleaching	NA	200-400
		Mercerization	NA	500-2000
		Dyeing	NA	500-2500
		Printing	NA	1200-2000
		Organizing (*)	NA	2000-10000
	Wool	Dyeing	NA	800-2000
		Organizing (*)	NA	300-1000
	Silk	Pre-Treatment	NA	1500-2500
		Dyeing	NA	500-1500
		Printing	NA	1200-2000
	Chemical Fibres	Refining	NA	10-8000
		Polyester fabric alkali reduction	NA	10000-30000
		Dyeing	NA	500-800
		Printing	NA	1000-2000
		Organizing (*)	NA	2000-5000
	Knitwear	Finishing	NA	500-800
	Yarn	Finishing	NA	1000-2000

5888

(*) Organizing wastewater includes waste finishing fluids and equipment cleaning wastewater.

5889

(**) Carbonization is the process of removing plant impurities before the comb process by chemical means.

5890

(***) The silk photorestriction process is the process of using chlorine as a chemical auxiliary to remove surface scales of wool and apply softeners.

5891

5892

(****) Cooking is the process of further removing impurities such as grease, wax, pectin and other impurities of fibre using thermoaline and surfactants

5893

5894

5895

10.5.3 Service lifespan

5896

Table 81. Studies addressing the lifespan of textile apparel

Study	Type of study	Source of data	Comments
(WRAP, 2017a)	Technical report	Online survey	Country: UK Sample: 3 244 people
(Laitala and Klepp, 2020a)	Scientific article	Wardrobe survey and data collected by previous research studies	Wardrobe survey: Countries: China, Germany, Japan, the UK, and the USA Sample: 213-230 respondents per country. Respondents' statistics: 100% 18-64 years old 51.6% Women 48.4% Men

Study	Type of study	Source of data	Comments
			Researched studies from: Australia, Norway, UK (2 studies) Netherlands (2 studies), Denmark, Finland and Norway
(Quantis, 2022)	Technical report	Producer judgement and literature studies	Values proposed by part of the industry within the development of the Product Environmental Footprint Category Rules for apparel and footwear
(Roos et al., 2015)	Technical report	Surveys and expert assumptions supported by national statistics on related topics	The study uses this data to perform an environmental assessment of the Swedish fashion consumption
(Laitala, IG Klepp, et al., 2018a)	Scientific article	Elaboration based on surveys	Average values from surveys carried out in: Norway, Netherlands, Greece, Spain, USA, Sweden, Germany, Poland, Australia, Canada and Finland
(Gray et al., 2022)	Key Findings Report	Surveys	Country: UK Sample: 6 000 interviewed users who purchase clothing at least once a year. Analysis on 44 807 items
(Drycleaning Institute, 2015)	Technical report	Expert judgement	Data are provided by the association of Australian dry cleaners.

5897 Source: Own elaboration

5898 **Table 82.** Parameters related to lifespan of specific types of apparel

Parameter	T-shirts	Shirts	Knitwear	Jeans	Socks
Average wear days per year	25	16	30	75	50
Implied wear days per month	2.1	1.3	2.5	6.2	4.2
Total days of wear for the garment's whole lifetime	112.5	80	150	300	125
Hours of wear during lifetime	1 350	960	1 800	3 600	1 500
Assumed days of wear per wash	2	2	5	10	2
Hours of wear per wash	24	24	60	120	24
Average number of washes for the target lifetime	56	40	30	30	62

5899 Source: (WRAP, 2017a)

5900

5901 **Table 83.** Possession span expressed as years by studies reported in Laitala et al. (2018)

Apparel type	Wardrobe Audit Survey in Seven Countries	Wardrobe Audit Interviews Norway (Textile Waste)	Survey. Norway	Online Survey. UK	Survey. UK	16 Households' Purchases. Netherlands	Survey. Netherlands	Survey (Germany. Poland. Sweden and USA)	Online Survey. Finland
T-shirts	4.6	4.2	NA	4	3.3	6.8	NA	3-4	4.5
Shirts and blouses	4.6	NA	5.6	3.3 (Blouses) 4.3 (shirts)	3.6	7.2	NA	NA	5.7
Sweaters and midlayers	5.8	NA	10.8 (woollen sweaters)	4.5	3.7	7.1	6.17 (Woollen sweaters)	NA	NA
Jackets and coats	5.3 (Jackets) 6.3 (Coats)	4 (Jackets)	6.4 (Coats)	6.5 (Jackets) 6.2 (Coats)	NA	11.5 (Jackets) / 11.6 (Coats)	NA	NA	7.6 (Coats)
Pants and shorts	4.9 (Pants) 3.9 (Jeans)	4.3 (Jeans)	4.4	5.4 (Pants) 3.8 (Jeans)	3.1 (Jeans)	6.2	2.45 (Cotton jeans)	3-4 (Jeans)	5.3
Dresses. skirts and jumpsuits	4.5 (Dresses) 4.8 (Skirts)	4.1 (Skirts)	NA	4.7 (Dresses) 5.2 (Skirts)	NA	15.2 (Skirts)	NA	NA	NA
Leggings, stockings, tights and socks	3.6 (Socks and stockings)	2.9 (Socks)	NA	2.4 (Socks)	1.8 (Socks)	NA	NA	NA	2.3 (Socks)
Underwear	2.5	4.4	NA	2.4	NA	NA	NA	NA	3
Swimwear	NA	NA	NA	NA	NA	NA	NA	NA	NA
Textile apparel accessories	NA	NA	NA	NA	NA	NA	NA	NA	NA

Source: (Laitala, IG Klepp, et al., 2018a)

5902

5903

5904 **Table 84.** Possession span, expressed as years, of types of apparel with specific fibre content

Garment Category	Cotton and blends	Synthetic/Man made	Wool and Blends	Silk
Pants/trousers	4.2	5.1	4.8	NA
Jackets	4.3	4.9	5.7	NA
Coats	5.8	8.4	5.3	NA
Sweaters	5.6	6.5	6.0	NA
Shirts and blouses	3.8	6.2	6.0	8.5
Ties	9.5	12.8	9.3	14.5
Socks and stockings	3.3	4.2	5.5	4.3
Underwear	2.2	3.2	3.9	3.5

5905 Source: (Laitala, IG Klepp, et al., 2018a)

5906

5907 **10.6 Supporting information about user behaviour**

5908 **10.6.1 Pre-purchase aspects**

5909 Approximately, Europeans purchase 14.8 kg of textile products annually (EEA, 2022b; Vladimirova et al., 2024),
 5910 which includes 6.0 kg of clothing, or roughly 24 new garments each year. However, these numbers conceal
 5911 significant inequalities as purchasing frequency rises with income (WRAP, 2022; Vladimirova et al., 2024).

5912 10.6.1.1 Reasons for purchasing

5913 McNeill and Moore (2015) distinguished two specific approaches consumers have towards apparel: 1)
 5914 consumers who see apparel as purely functional and 2) those who view apparel as self-representational. This
 5915 influences what aspects are the most important for consumers at the point of sale.

5916 A survey among Dutch consumers show that before shopping, almost half of 1 046 users claim to know what
 5917 they are going to buy (D&B, 2020a) and they indicate that the main reasons for buying apparel are the following
 5918 (listed in order from most to less common):

- 5919 1. Look good or fun;
- 5920 2. Replacing old, worn or broken apparel;
- 5921 3. Buy “essential” apparel, meaning apparel that is basic and for everyday wear, i.e. one-colour t-shirt;
- 5922 4. Want to join the trend;
- 5923 5. Want new apparel;
- 5924 6. Need apparel for a special occasion.

5925 Another survey targeting 200 Dutch consumers showcased that consumers may be more likely to buy new
 5926 apparel when is outdated, in terms of appearance or when they are afraid the item will break again quickly
 5927 after being repaired (milieu centraal, 2021).

5928 A survey representative of the German population showed that a third of respondents associate fun with buying
 5929 apparel. In the 40-70 age group the proportion of those who enjoy buying apparel is significantly higher than
 5930 the population average. In the female surveys from this social group, it is more than 60%. Fun shopping for
 5931 apparel is also widespread among female respondents from the young group (Kleinhüchelkotten et al., 2018a).

5932 It shall be noted that there are a number of factors that may influence consumers buying behaviour: brand
 5933 perception and exclusivity, personal factors such as age, gender, culture, etc., marketing campaigns, economic
 5934 conditions, etc. (Anisha and Kalaivani, 2016; Khanna, 2021). In particular, malicious interface design strategies
 5935 have been investigated to trick users into decisions against their best interests, such as spending money
 5936 (Schäfer et al., 2023). These patterns are prevalent in digital services, including online shopping sites (Yada et
 5937 al., 2022). An example of dark patterns that may be more prevalent in apparel purchases is the ‘low-stock
 5938 message’ which entail a false claim that a product is nearly sold out to create a sense of urgency and encourage
 5939 quicker purchases (Schäfer et al., 2023). Moreover, the results of an analysis of webshops ran by the Swiss

5940 consumer organisation (FRC) and the association Public Eye, showcased that dark patterns frequently tempt
5941 consumers to purchase additional items. For instance, 13 shops displayed supposedly matching items as soon
5942 as something was added to the online shopping cart, while 10 shops calculated shipping costs to encourage
5943 higher spending if the purchase amount is too low (FRC and Public Eye, 2022). Apparel is often bought
5944 spontaneously without thinking long beforehand. Only 16% of the respondents clearly disagree with the
5945 corresponding statement. In turn, the proportions of spontaneous buyers and those who regularly 'declutter'
5946 their wardrobe to make room for new things are above average in the 40-70 age group. More than 60% of
5947 female respondents in this population segment are frequent spontaneous buyers. The relatively high proportion
5948 of spontaneous buyers as a whole, leads to the conclusion that only a minority inform themselves correctly
5949 before buying apparel. The differences between the social groups are not particularly large in this regard
5950 (Kleinhüchelkotten et al., 2018a).

5951 The aspects affecting the purchase decision of apparel among consumers could be influenced by discount offers
5952 that stimulate impulsive purchases both in on-line sites and in physical shops (Djafarova and Bowes, 2021). In
5953 fact, a phenomenon that affects both type of stores around the globe is the New Year sales which incentivise
5954 the purchase motivation (Amasawa and Kimita, 2023). It seems clear that the more impulsive purchases
5955 consumers make, the more often they buy apparel per year while also spending more money on apparel each
5956 month (D&B, 2020a).

5957 Even though visual aids are used in social media channels to produce a similar purchasing experience to the
5958 one in physical stores (Djafarova and Bowes, 2021), the impulse purchases seem to be more associated to the
5959 physical stores and affect especially the younger population (Cook and Yurchisin, 2017). However, online
5960 retailers have also reported that a significant portion of their customer base comprised individuals who engaged
5961 in casual shopping for fashion items without a specific utilitarian purpose often characterized as impulse buyers
5962 (Vinted, 2021). When users have events coming up (parties, travelling plans, etc.) then, purchases of apparel
5963 become a priority and this may lead to impulsive purchases (Hultén and Vanyushyn, 2014). Impulse purchase
5964 tendency may be also triggered more often among consumers who are wealthier and also have more time
5965 available for purchasing apparel (Hultén and Vanyushyn, 2014).

5966 Moreover, according to a survey among 2 500 consumers in the United Kingdom, Sweden, Italy, France and
5967 Germany, offering discounts can prompt excessive consumption, leading to feelings of regret among buyers.
5968 Although the initial thrill of finding a bargain can be exhilarating, it often results in impulsive purchases and a
5969 focus on obtaining deals rather than considering actual needs. Zalando survey indicates that 65% of consumers
5970 prioritize low prices or discounts when shopping apparel. The allure of a discounted purchase is particularly
5971 strong, with 52% of females and 46% of males emphasizing the importance of the excitement associated with
5972 buying. This tendency suggests that many consumers may prioritize the thrill of the purchase over making
5973 thoughtful, sustainable choices, potentially leading to overconsumption. Interestingly, despite recognizing that
5974 impulsive bargain hunting contradicts their sustainability values, consumers frequently experience post-
5975 purchase regret. A substantial 82% of respondents admit to feeling some form of regret after shopping, with
5976 28% expressing concerns about environmental impacts and labour conditions during production (Heiny and
5977 Schneide, 2021).

5978 10.6.1.2 Criteria used when buying apparel

5979 Studies revealed four main attributes concerning apparel purchase decision: brand, style, place of purchase, and
5980 price (Iwanow et al., 2005, as cited in Harris et al., 2016). Price being one of the main drivers in apparel purchase
5981 decision (Adigüzel et al., 2020).

5982 Fashion trends are significantly more important for younger consumers than for older ones (AK Wienn and
5983 Greenpeace, 2023a; Spaepen et al., 2021) and they are even seen as a sign of success (AK Wienn and
5984 Greenpeace, 2023a). Preference for brand new items and aspects such as comfort when wearing an item of
5985 apparel, its country of origin, type of textile material and even knowledge about the brand are important drivers
5986 for older generations of consumers (Generation X and Baby Boomers) (Spaepen et al., 2021).

5987 According to Mishra et al., 2023, perceived value refers to "the subjective evaluation of the worth or benefits
5988 that a customer believes they will receive from a product or service". In this sense, a survey of over 3 000
5989 American adults of over 18 years old indicates that 'value' was the first driver influencing purchasing behaviour
5990 across apparel followed by quality (Thredup, 2023). Similarly, 1 506 Austrians were surveyed about their
5991 apparel consumption and most of them reported functionality (92%) and quality (85%) to be among the most
5992 important criteria when purchasing apparel (AK Wienn and Greenpeace, 2023a). The monetary value of the
5993 apparel follows the ranking closely with 78% of respondents who claim that a low price is a very important

5994 factor when acquiring apparel (AK Wienn and Greenpeace, 2023a). Similarly, among the primary factors
5995 influencing Spanish consumers' apparel purchases are quality and price, with environmental impacts also
5996 playing a significant role, being quite or very influential for 44.2% of over 2 000 surveyed consumers (CECU,
5997 2023).

5998 Currently, the EU lacks harmonized labelling regulations that require the disclosure of working conditions where
5999 textile products are made. This lack of information on social responsibility is seen as an issue by 65% of
6000 respondents to the Textile Labelling Regulation Public Consultation, as it makes it difficult to make informed
6001 purchasing decisions (Evaluation report of the Textile Labelling Regulation, under development).

6002 Sustainability and social standards with around 40% of respondents considering them as less important drivers
6003 in the purchasing decision (AK Wienn and Greenpeace, 2023a). This is in line with the responses from German
6004 consumers who indicate that ecological and social criteria play only a minor role in the purchase of apparel
6005 (Kleinhüchelkotten et al., 2018a) and the average of respondents who claim that environmental aspects were
6006 unimportant in their last purchase of a coat (Consumers, Health, Agriculture and Food Executive Agency. et al.,
6007 2018). Moreover, 35% of 2 500 survey respondents indicate that they often opt for a deal instead of a
6008 sustainable item (Heiny and Schneide, 2021). In the young and low-income population segments such criteria
6009 are given far less importance (Kleinhüchelkotten et al., 2018a). Nonetheless, the responses of three-quarters of
6010 respondents to the survey suggest that a possible pollutant exposure could prevent them from buying certain
6011 apparel (Kleinhüchelkotten et al., 2018a). In any case, social criteria considerations are relevant for the revision
6012 of the EU Ecolabel criteria on textiles.

6013 A survey in Germany explored the social importance given to apparel by gender and by groups with similar
6014 socioeconomic positions and cultural values (Kleinhüchelkotten et al., 2018a). In this survey, more than half of
6015 the respondents indicated a certain reluctance to buy apparel, with 26% who actually try to get by with few
6016 apparel. The proportion of men in the precarious group, who claim to be reluctant to buy apparel is significantly
6017 higher at 46.6%. In the focus groups it had already become clear that many of them have inhibitions to throw
6018 away apparel. This is in line with the fact that 78% of respondents strongly agree with the statement that
6019 apparel should be used for as long as possible and should only be disposed if it is no longer wearable. The
6020 intention to use the apparel for as long as possible is significantly lower in the higher age groups (40 to 70
6021 years with higher level of education). Also the statement "I like apparel that I can wear in many occasions" has
6022 been repeated in all groups of survey participants. Although in the youth segment, comparatively there is less
6023 interest in versatile apparel (Kleinhüchelkotten et al., 2018a).

6024 Additionally, more than half of users below 25 years old (Generation Z) are more likely to shop with a brand
6025 that offers second hand alongside new (Thredup, 2023). Moreover, Generation Z values unique apparel and the
6026 possibility of ordering and returning items online (Spaepen et al., 2021). Moreover, the Thredup survey (2023)
6027 indicates that resale is increasingly driving the purchasing decisions of Generation Z users, in concrete 82% of
6028 them have considered the resale value of apparel before buying it compared to only 58% of the overall
6029 consumers.

6030 According to Kleinhüchelkotten et al. (2018) purchasing decisions of the German population are not very much
6031 influenced by whether the apparel was made nationally or is easy to repair. However, a very large proportion
6032 of respondents claim to pay attention to the easy to maintain aspect when buying apparel (Kleinhüchelkotten
6033 et al., 2018a). In contrast, a survey from Fashion Revolution (2020) revealed that 75% of surveyed German
6034 consumers consider important that brands provide repair and care information about an apparel item, the
6035 average being 79% of 5 000 consumers across five countries (Fashion Revolution, 2020). The survey
6036 participants were between 16 and 75 years old (Fashion Revolution, 2020).

6037 It shall be noted that the surveys analysed so far do not specifically address sportswear. On the contrary, a
6038 Cotton Incorporated's survey investigated consumer's attitudes and behaviours on sportswear purchases. The
6039 survey targeted 1 500 gendered balanced consumers, ages 13 to 70, representative of the United States
6040 population found that found that top purchase drivers for sportswear among consumers were: comfort (77%),
6041 fit (69%), washes clean (65%), quality (64%) and durability (62%) (Cotton Incorporated, 2014)

6042 10.6.1.3 Quality assessment of apparel

6043 Consumer satisfaction with the quality of an apparel product can be measured in three phases: at the point of
6044 purchase, while using the item, and ultimately, when it is disposed. Quality is generally first evaluated "pre-use"
6045 and then experienced "during use" (Piippo et al., 2022a).

6046 Fashion is a highly tactile experience in which purchasing decisions are often made based on how the apparel
6047 or accessory 'feels' and how the quality is perceived (De Klerk and Lubbe, 2008; Williams and Ackerman, 2011;

6048 McLaren et al., 2016; Vladimirova et al., 2022). Yet, for consumers it is very difficult to assess the quality and
 6049 durability of apparel at the point of purchase (Harris et al., 2016; McLaren et al., 2016). Goworek et al. (2012)
 6050 reported that consumers usually judge apparel quality by its feel (personal considerations) and the brand. In
 6051 any case, it shall be noted that the topic of longevity in relation to visual or aesthetic degradation has been
 6052 minimally explored in existing literature. The lack of information on how expected longevity evolves over time
 6053 is a significant barrier (Kumar et al., 2023). This gap not only may prevent consumers from making informed
 6054 purchasing decisions but also complicates their ability to use the apparel item effectively according to Kumar
 6055 et al. (2023).

6056 Several researchers have tried to gather the aspects that influence the perception of quality in apparel (**Table**
 6057 **85**).

6058 **Table 85.** Aspects that influence the perception of quality in apparel

Intrinsic product attributes	Extrinsic producer factors	Experienced features	Values, convictions
Material Manufacturing quality Fit	Price Brand Manufacturing location	Tactile feeling Functionality Durability Emotional value Fit Availability Context Price	Low environmental impact Local production Ethical production

6059 *Source: Adapted from Niinimäki, (2011); Koszewska, (2016); Henninger et al., (2017)*

6060 The aspects reported in **Table 85** are mentioned in different consumer surveys. Overall, it is documented that
 6061 price is usually associated by consumers as a quality indicator (Keiser et al., 2012 as cited in Wakes et al.,
 6062 2020). In an American survey, it was documented that 58% of users thought that the apparel with lower price
 6063 had worse quality compared to higher-priced items, and 78% (ages 13–24 years and 35–70 years) indicated
 6064 that “you get what you pay for” implying that apparent better quality apparel may be the ones that have higher
 6065 price (Monitor, Cotton Incorporated Lifestyle, 2018).

6066 Durability and ease of care characteristics seem not to be considered per se, by users when they are buying
 6067 apparel (De Klerk and Lubbe, 2008; Wakes et al., 2020a). However, this may be because quality and durability
 6068 are associated by consumers and industry specialists (Yuille, 2015; Wakes et al., 2020a). In other words, apparel
 6069 with perceived high quality is expected to be durable.

6070 As it happens when assessing the quality of apparel, consumers’ expectations of apparel longevity are mostly
 6071 related to the price (Forbrugerrådet Tænk, 2022). This is a particular believe for younger generations (Monitor,
 6072 Cotton Incorporated Lifestyle 2018 as cited in Wakes et al., 2020). Nonetheless, price may not correctly reflect
 6073 the quality and hence, the durability to laundering, for instance (Ghaani Farashahi et al., 2018b; Wakes et al.,
 6074 2020a; Badgett, 2017). In fact, some studies have proved that cheaper apparel are not always a synonym of
 6075 worse quality (Wakes et al., 2020a; Badgett, 2017). Nonetheless, according to Harris et al., (2016) the price is
 6076 the deal breaker when it comes to decide whether to buy a piece of apparel or not, even among environmentally
 6077 aware consumers.

6078 Lifetimes expectations for consumers are also linked to where the apparel are purchased, care requirements,
 6079 material and purpose/context (Forbrugerrådet Tænk, 2022). It is interesting to note that 43% of Austrian survey
 6080 participants declared their willingness to buy long-lasting apparel despite of the price while 30% of them
 6081 already buy them (AK Wienn and Greenpeace, 2023a). In addition, 55% out of 1 000 German consumers would
 6082 be willing to pay more for their apparel if being certain about increased durability (VZBV, 2022). In a Zalando
 6083 survey, 58% of 2 500 consumers consider long-lasting quality to be significant in apparel, with 52% stating
 6084 that they frequently consider this aspect while shopping. Similarly, 45% of respondents prioritize value for
 6085 money (Heiny and Schneide, 2021).

6086 10.6.1.4 Information reported on apparel labels

6087 Apparel labels and tags can have the same meaning. Generally speaking, the word label is used to refer to an
 6088 attachment that is not meant to be removed from the apparel and provides details about it. The term tag may
 6089 be referred to any type of attachment, whether made out of paper or cardboard including tags attached at the
 6090 point of sale intended for removal.

6091 Textile products sold in the EU must have a label and comply with the EU labelling requirements set in the EU
 6092 Textile Labelling Regulation (TLR) 1007/2011 (14). According to the mentioned Regulation, the label must be

6093 firmly attached to the apparel and must contain information on fibre composition. Moreover, the information
6094 on textile composition must be separated from other type of information such as product care.

6095 Information about care of the apparel is voluntary, according to EU law²⁰⁶ and in general practice, but can also
6096 be legally required, notably by Member States and third countries (GINETEX, 2017a). In fact, currently, nine
6097 Member States mandate care labelling through their national laws, while others only offer it as a recommended
6098 option (Evaluation report of the Textile Labelling Regulation, under development). In most instances, the
6099 legislation does not specify how this requirement should be implemented. However, some countries, like Estonia,
6100 directly reference ISO standards in their national laws. In Austria, care symbols are provided in an annex to the
6101 national legislation (Evaluation report of the Textile Labelling Regulation, under development). When it comes
6102 to care labelling, manufacturers and even retailers can provide the product care instructions using symbols or
6103 offering a written explanation (GINETEX, 2017a).

6104 It is interesting to note that when it comes to making informed consumer decisions, around 75% of respondents
6105 to the TLR Public Consultation consider it a problem the lack of harmonised labelling rules regarding care
6106 information of textile products and textile related products (Evaluation report of the Textile Labelling Regulation,
6107 under development).

6108 Information about user attention to apparel care labels is available in Section 10.6.2.8. However, when it comes
6109 to labels in general, little is known about the extent to which consumers pay attention to them. For instance,
6110 1 056 Portuguese consumers were surveyed about their habit of reading labels before purchasing apparel. The
6111 results were somewhat mixed, with the majority (53%) indicating that they do have this habit, while 39%
6112 reported that they do not typically read labels before making a purchase (Ribeiro et al., 2023).

6113 An attitude-behaviour gap survey from Zalando showed that 58% of 2 500 respondents indicate that they
6114 should understand certain aspects of the apparel item, i.e. the materials used. However, just 38% regularly
6115 check the label for information (Heiny and Schneide, 2021). Similarly, while 60% of the survey participants
6116 express the significance of transparency about apparel aspects, only 20% actively pursue information during
6117 their buying journey (Heiny and Schneide, 2021). In like manner, a significant 74% of a sample of 1 000 Italian
6118 consumers expressed a strong need for clearer and more transparent information regarding the true
6119 sustainability of apparel and the production processes behind them (Altroconsumo and IPSOS, 2024).

6120 Furthermore, a 2010 Eurobarometer survey found that 50% of 26 635 European citizens check the country of
6121 origin when buying textiles and clothing, and over half of those individuals reported that this influences their
6122 decision (28% of all respondents). This indicates that country of origin labelling plays a significant role in
6123 consumers' purchasing choices (European Commission, 2010). Related to this, a survey from the Spanish
6124 Consumer Organization (OCU) targeting 340 Spanish consumers indicated that 42% of respondents admit
6125 looking at the origin of the apparel in order to buy locally or not to buy from countries contributing to labour
6126 exploitation (OCU, 2018). Some of the Spanish consumers who responded to the same survey check the labels
6127 to get information about the material composition as 38% of them have personal preferences towards natural
6128 origin fibres while 25% avoid synthetic fibres due to the microplastic release occurring after washing the
6129 apparel (OCU, 2018).

6130 Overall, textile labels and the information they provide are considered valuable only if they are trusted by
6131 consumers (Circle Economy, 2020 as cited in the Evaluation report of the Textile Labelling Regulation, under
6132 development). This is especially important for voluntary labels that highlight the sustainability features of textile
6133 products (Circle Economy, 2020 as cited in the Evaluation report of the Textile Labelling Regulation, under
6134 development). In this light, users seem to have a growing interest in EU ecolabelled products in the category of
6135 'textiles, clothing/footwear'. In particular, 71% out of 26 635 survey respondents in the EU27 Member States
6136 express a desire to find more of the abovementioned products carrying the EU Ecolabel. This sentiment is
6137 prevalent in all countries, with varying percentages (from 54% in Czechia to 83% in Portugal and Romania)
6138 (European Commission. Directorate General for Environment, 2023).

6139 10.6.1.5 Attitudes towards second-hand apparel purchase

6140 In recent years, there has been a notable shift in consumer behaviour towards the adoption of second-hand
6141 apparel, reflecting evolving preferences and attitudes. In fact, more than three out of ten (34% of 26 595

206 The ongoing review of the Textile Labelling Regulation is exploring whether to harmonise and even render care labelling mandatory

6142 respondents) would purchase second-hand textiles (apparel and home textiles included in this category)
6143 (European Commission. Directorate General for Environment, 2014). Another survey indicates that 17% out of
6144 11 483 European consumers purchase their apparel in second-hand shops while 12% buy them on resale apps
6145 (YouGov, 2021). Additionally, more than 70% of 27 498 respondents across the European Union agree that
6146 second-hand apparel should be promoted more (European Commission, 2019). In fact, 65% of 2 500 Spanish
6147 consumers expressed their desire to give a second life to their apparel items as 87% of them believe that is
6148 important (Asociación para la Gestión del Residuo Textil y el Calzado, 2024). Despite of this, surveys have found
6149 that the attitudes and the consumer behaviours are not always aligned. This is the case for 61% of users who
6150 think that second-hand purchase is important but only 25% of them buy second-hand apparel (Heiny and
6151 Schneide, 2021).

6152 There seems to be gender disparities as women exhibit a higher inclination towards buying second-hand apparel
6153 compared to men (European Commission. Directorate General for Environment, 2014; YouGov, 2021). The age
6154 dynamics indicate that younger demographics, particularly 18-25 year-olds, lead in second-hand apparel
6155 adoption, contrasting with relatively lower participation among those aged 26-40 (D&B, 2020a). This is
6156 supported by the findings in AK Wienn and Greenpeace (2023), young consumers (aged 16-29) buy far more
6157 second-hand apparel (both online and offline). The primary drivers behind the adoption of second-hand apparel
6158 include financial savings, sustainability/environmental consciousness, and a preference for unique, vintage
6159 pieces (D&B, 2020a).

6160 It shall be noted that the second-hand cycle relies on the primary market and consumer behaviour, with
6161 consumers acting as both partners and suppliers by disposing of items in good, reusable condition, thereby
6162 making used apparel available for second-hand use (Machado et al., 2019 as cited in Turunen and Gossen
6163 2024). Consequently, there is a dual role for consumers: those disposing of apparel items with the intention to
6164 receive money from them (sellers) and those interested in purchasing used clothing (buyers) (Turunen and
6165 Gossen, 2024).

6166 Moreover, preliminary observations from the Turunen and Gossen (2024) study indicates that current second-
6167 hand business models also incorporate consumption-promoting marketing strategies. The study also noted an
6168 increase in unworn or slightly used items on second-hand platforms. The use of subscription models to
6169 encourage ongoing buying and selling, may result in shorter garment lifespans. Turunen and Gossen (2024)
6170 also highlight that self-service flea markets, with their lower prices, may attract treasure hunters more for the
6171 shopping experience than the actual purchases, sometimes leading to less responsible buying behaviour of
6172 apparel (Turunen and Gossen, 2024).

6173 The 'replacement rate' for apparel items is understood as "the degree to which the purchase of second-hand
6174 articles replaces the purchase of similar new items" (Nørup et al., 2019; Trzepacz et al., 2023). On one hand,
6175 there are studies which highlight that second-hand purchases, generally speaking, tend to have a reduction
6176 effect on the purchase of new apparel (Klepp et al., 2020b; Vinted, 2021) thus extending the life of existing
6177 apparel (Klepp et al., 2020a). In particular, some studies operate under the assumption of a one-to-one
6178 replacement ratio, meaning that buying a used apparel item completely offsets the purchase of a new one
6179 (Trzepacz et al., 2023). However, various studies indicate that actual replacement rates differ significantly
6180 (Sandin and Peters, 2018; Trzepacz et al., 2023). For instance, results of a survey based on over 350 000
6181 responses across eight European markets showed that 39 out of 100 people buying a second-hand product on
6182 the retailer's website would have avoided purchasing a new product (Vinted, 2021). Depending on the product
6183 category, significant variation in the avoided purchase rate was observed for instance, coats and jackets were
6184 among the products having high replacement rate (Vinted, 2021). In Farrant et al., (2010), purchasing 100
6185 second-hand apparel items would save between 60 and 85 new ones, depending on the location where they
6186 are reused.

6187 Consequently, more research and other variables should be taken into account when considering estimations
6188 of replacement rates (Trzepacz et al., 2023). As for example, an apparel item with low quality, sold after just
6189 one use, may avoid the purchase of other items. However, due to its low quality, the usability of the item may
6190 be limited. This means there may be cases in which buying brand-new items with higher quality could have
6191 better impact on the environment than buying second-hand apparel items with lower quality.

6192 10.6.1.6 Attitudes towards the purchase of apparel made without harmful chemicals

6193 Over 85% of 27 498 respondents of an EU-wide survey expressed concern about how chemicals found in
6194 everyday products may affect their health (European Commission, 2019). In particular, consumers have
6195 reported to be increasingly concerned about the use of hazardous chemicals in apparel (Evaluation report of
6196 the Textile Labelling Regulation, under development).

6197 According to 61,2% of over 2 000 Spanish consumers, the restriction of hazardous chemicals in apparel is the
6198 second most important measure that policy makers should take after ensuring clothes are produced in fair
6199 conditions (CECU, 2023).

6200 A survey involving 26 718 citizens across the 27 EU Member States found that the chemicals in the apparel
6201 fabrics are generally perceived as minimally risky, with 60% of Europeans viewing them as not posing a risk to
6202 people. Among different fabric types, synthetics are viewed as posing the highest risk, although only 22% of
6203 Europeans categorize them as presenting a significant health risk (European Commission, 2009).

6204 Fabrics with chemical-specific quality labels indicating the absence of harmful chemicals to health and the
6205 environment, are thought to carry lower risks and materials like wool, cotton, or linen are perceived as entirely
6206 risk-free. Europeans hold divergent views on the relevance health and environmental risks when purchasing
6207 apparel – some consider it highly important, while an equivalent proportion does not find it significant (European
6208 Commission, 2009).

6209 Europeans were also surveyed about the significance they attribute to potential health and environmental risks
6210 associated with fabric when purchasing apparel for themselves or their families. Of the respondents, 18%
6211 consider it fairly important, while nearly four in ten respondents find it very important (39%), and a similar
6212 proportion deems it not important (37%). A country-level analysis reveals that approximately two-thirds of
6213 respondents in Germany and Slovakia find environmental and health risks very important when buying apparel.
6214 Conversely, in Denmark and the United Kingdom, more than six in ten respondents consider this aspect not
6215 important (European Commission, 2009).

6216 Additionally, data from the Fashion Revolution (2020) consumer survey shows that an average of 37% of 5 000
6217 consumers in the United Kingdom, France, Germany, Italy and Spain consider important to buy apparel that is
6218 not produced using harmful chemicals. On top of that, a survey from *Sveriges Konsumenter (2020)* shows that
6219 86% of 1 000 surveyed Swedes would like to access information about the content of harmful chemicals in
6220 apparel at the time of purchase. The Fashion Revolution survey does not provide information about the type of
6221 chemicals. It shall be noted that all age groups, genders and users with different income provided no important
6222 differences in the responses.

6223 10.6.1.7 Attitudes towards the purchase of apparel made with recycled materials

6224 The Fashion Revolution (2020) survey indicated that an average of 11% of 5 000 European consumers from
6225 the United Kingdom, France, Germany, Italy and Spain pointed out that it is important that the apparel they buy
6226 contains recycled materials. Italy, is considerably above the average with 51% of users considering important
6227 the presence of recycled materials in the apparel they purchase. Spain, France and Germany remain in the
6228 average for the five countries. However, the survey does not offer information about such materials. In this
6229 case, the group of respondents between 55 and 75 years old consider less important whether the apparel they
6230 purchase have recycled materials or not, as only 7% declare so as opposed to the youngest age group (12-24
6231 years old) in which 14% percent of users indicate the importance of buying apparel containing recycled
6232 materials. No notable differences in survey responses exist between different income and gender groups.

6233 Furthermore, three-quarters of 27 498 respondents of an EU-wide survey declared that apparel should only be
6234 made from materials that can be recycled (European Commission, 2019).

6235 **10.6.2 Post-purchase aspects: the user behaviour during use**

6236 The post-purchase aspects of apparel encompass the use and care phases. Studies on laundering procedures
6237 have been investigated from a variety of angles, including their impact on the environment and cleanliness.
6238 Nevertheless, the majority of these research (*Gooijer and Stamminger, 2016 as cited in Laitala et al., 2017*)
6239 solely consider machine washing, paying little attention to other cleaning techniques such as hand washing, dry
6240 cleaning, airing, steaming, ironing, and stain removal (Laitala et al., 2017). These maintenance procedures have
6241 a different environmental impact than machine cleaning and are widely used specially for woolen and delicate
6242 apparel according to *Laitala et al., (2017)*.

6243 Moreover, the underlying drivers and barriers to sustainable consumer use and care are not sufficiently well
6244 captured in the literature, especially regarding frequency of laundering apparel, number of uses and product's
6245 lifetime (Conrady et al., 2014; Yates and Evans, 2016; Luo et al., 2023b). In fact, retailers claim that the way
6246 users take care of apparel determine their physical lifespan (McLaren et al., 2016). This is important as it seems
6247 that not many consumers seem to be willing to change their laundering behaviour (Uitdenbogerd 2007 as cited
6248 in Luo et al., 2023).

6249 The frequency of laundering, washing temperature, number of days apparel are worn between washes and
 6250 chemicals used for washing the apparel are among the factors that affect the durability of apparel and also
 6251 determine the extent of the environmental impacts associated to washing them. All these aspects are heavily
 6252 dependent on the behaviour of users which vary depending on the culture and climate (Laitala et al., 2017;
 6253 Klepp and Laitala, 2023b).

6254 As a result, this chapter brings forward some information about different user laundering practices which
 6255 encompass the sorting of the apparel before washing, the washing temperature and washing frequency, the
 6256 drying method, the ironing or steaming process and the storage.

6257 10.6.2.1 Sorting before washing

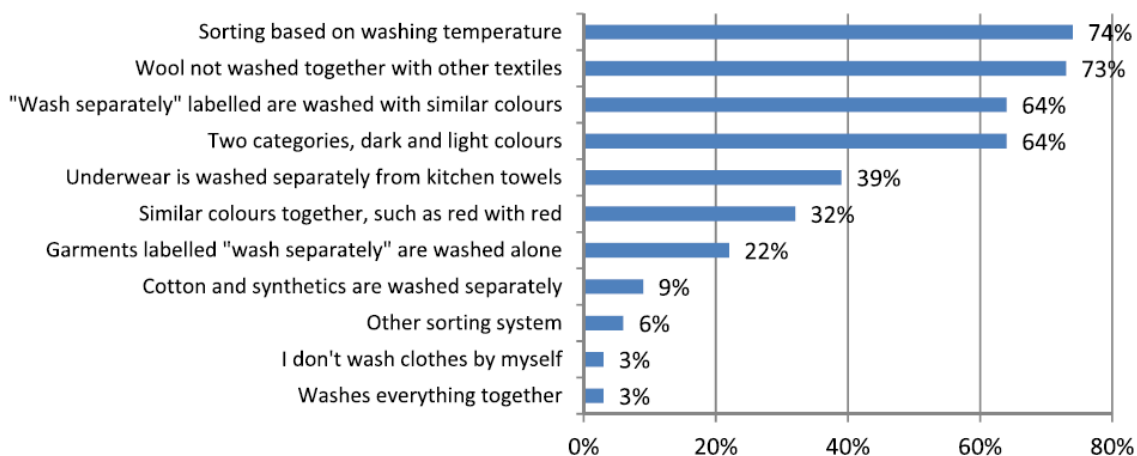
6258 Textile materials have specific cleaning requirements, hence the importance of sorting before washing in order
 6259 to preserve the apparel shape and colour (Cooper and Claxton, 2022b; Klepp and Laitala, 2023b) and hence
 6260 extend the lifetime of the apparel (Cooper and Claxton, 2022b).

6261 Figure 53 gives an overview of different sorting practices and average percentage of users that opt for each of
 6262 them. The results are based on responses from 545 users in Norway. It seems that sorting based on washing
 6263 temperature is the most popular sorting method while washing everything together without differentiation
 6264 between the apparel is not generally chosen by consumers.

6265

6266

Figure 53. Laundry sorting methods



6267

6268

Source: Laitala and Boks, (2012)

6269 The sorting processes in laundry exhibit considerable variation, influenced by factors such as washing
 6270 temperature, colour, fibre type, usage area, and care labelling. Merely 3% of participants indicated a preference
 6271 for washing all items together. Younger respondents tend to categorize colours into just two groups (light and
 6272 dark). Sorting based on washing temperature is more prevalent among female participants and those in higher
 6273 age brackets. Woollen products are commonly segregated from other fibre types, with 73% of survey
 6274 respondents affirming that they avoid washing wool alongside other textile materials. Some consumers find it
 6275 challenging to amass a sufficient amount of apparel to fill the machine when using multiple sorting categories
 6276 (Laitala et al., 2012).

6277 10.6.2.2 Washing temperature and washing frequency

6278 The average laundry temperatures differ between different countries. The average European washing
 6279 temperature was 42.4°C in 2020 (A.I.S.E, 2020), in Scandinavia is 46.2°C and in Southern Europe lower 39.7°C
 6280 (A.I.S.E, 2017b). In the USA, the average temperature is 30°C, while in Japan is 20°C (Laitala et al., 2020).

6281 **Figure 54** shows that washing cycles at an average of 40°C have been found as the most commonly selected
 6282 washing temperature among consumers. This is also supported by the study from Laitala et al., (2012).

6283 **Table 86.** Preferred washing temperatures for consumers

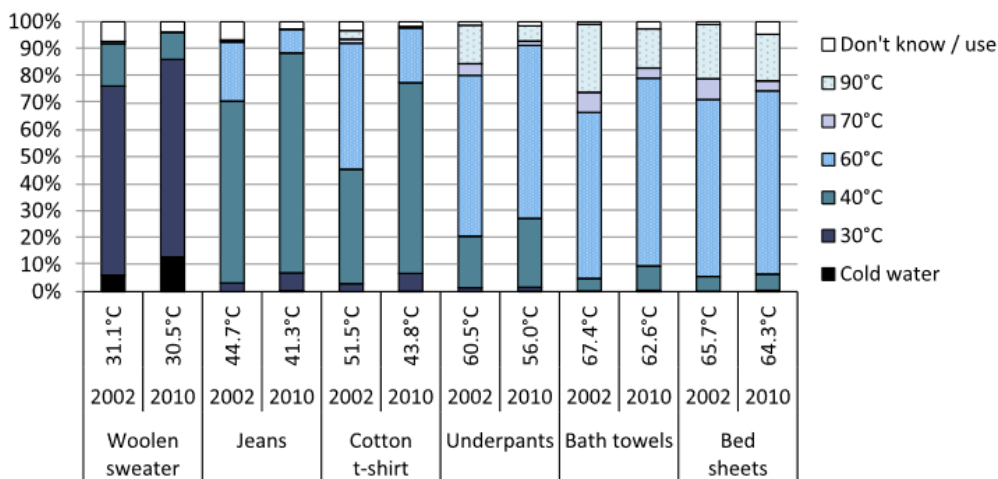
Publication	Sample details and characteristics of the study	Country	Preferred washing temperatures ^(a)			
			20 or cold setting	30	40	60
WRAP (2019)	Two waves of online surveys: Wave 1 was conducted in November 2016 and Wave 2 in June 2019. The sample size in 2016 was 1 000 per country. In 2019 the samples were as follows: Denmark 1 046; Germany 1 113; The Netherlands; 1 117 and Italy 1 226.	Denmark (DK), Germany (DE), The Netherlands (NL) and Italy (IT).	NA	Second most frequently used laundry wash temperature in all five countries.	Most frequently used laundry wash temperature in all five countries	NA

6284 ^(a) There is no information about the correlation between the temperatures indicated and the information reported on the care labels

6285 *Source: own production based on references indicated in the first column of the table*

6286 Whether the washing temperatures in **Figure 54** are in line with care label recommendations of the apparel in
 6287 question is not specified in the study from Laitala et al., (2012). A total of 1 008 users participated in the survey
 6288 from Laitala et al., (2012) while the sample in 2010 was a bit more than half the size with 546 respondents.

6289 **Figure 54.** Distribution of washing temperatures for different textile products



6290

6291

Source: Laitala and Boks, (2012)

6292 The frequency of washing is a crucial factor in determining the longevity of apparel because it represents one
 6293 of the primary factors that can cause the apparel item to wear out and either extend or shorten its lifespan.

6294 The average washing frequency per household in Europe is estimated in 3.8 washing cycles per week (Schmitz
 6295 and Stamminger, 2014; Klepp and Laitala, 2023; Laitala et al., 2018b).

6296 The frequency of washing cycles is closely tied to the household's size. As the number of individuals in the
 6297 household rises, so does the overall number of washing cycles. However, the average number of washing cycles
 6298 per person decreases, suggesting a more efficient utilization of washing machine capacity (Klepp and Laitala,
 6299 2023b).

6300 Other sources indicate that users wash their apparel items on average 10.9 times a month, excluding underwear
 6301 and socks (D&B, 2020a). Women (average 11.58 times per month) wash their apparel more often than men
 6302 (average 9.93 times per month). Additionally, users living in metropolitan areas tend to wash less often (8.2
 6303 times a month) than users whose home is in less urban areas (13.3 times a month in a non-urban area). The
 6304 analysis of the survey results from D&B (2020) found no explanation for this behavioural pattern. Age and
 6305 educational level, did not offer different results in washing frequency (D&B, 2020a).

6306 The duration of time that apparel is worn before being washed exhibits significant variability among different
6307 types of apparel. Typically, items like underpants and socks are laundered after each use, whereas certain outer
6308 apparel are infrequently washed (Laitala et al., 2018).

6309 **Table 87** displays the difference in number of uses prior to washing depending on the purpose of the category
6310 of apparel.

6311 **Table 87.** Average number of uses of apparel categories prior to washing

Study	T shirts	Shirts and blouses	Sweaters and mid layers	Jackets and coats	Pants and shorts	Dresses skirts and jumpsuits	Leggings stockings tights and socks	Underwear	Swimwear	Textile apparel accessories	Knitwear
Quantis, (2022)	1	2	5	20	3	3	2	1	1	NA	NA
Klepp et al., (2020)	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5	NA	NA
Laitala, IG Klepp, et al., (2018a)	1.5 (Cotton)	2 / 3 (Woollen undershirts)	10 (Wool) / 5 (Cotton)	NA	5.5 (Jeans)	NA	2	1	NA	NA	NA
WRAP, (2017a)	2	2	NA	NA	10 (Jeans)	NA	2	NA	NA	NA	5
Roos et al., (2015)	2	NA	NA	100	9 (Jeans)	3 (Dresses)	NA	NA	NA	NA	NA
Gray et al., (2022)	2.6	2.3	4.7 (Sweatshirt and hoodie)	14.5 (Non-padded) / 16.7 (Padded)	4.2 (Shorts) / 4.5 (Trousers) / 5.5 (Jeans)	3.2 (Skirt) / 2.6 (Dress)	3.3 (Leggings) / 2.4 (Socks and hosiery)	3.5 (Bras)	1.7	NA	4.3

6312 NA: Not available

6313 Knitwear products could belong to more than one category from those considered

6314 Source: own production based on references indicated in the first column of the table

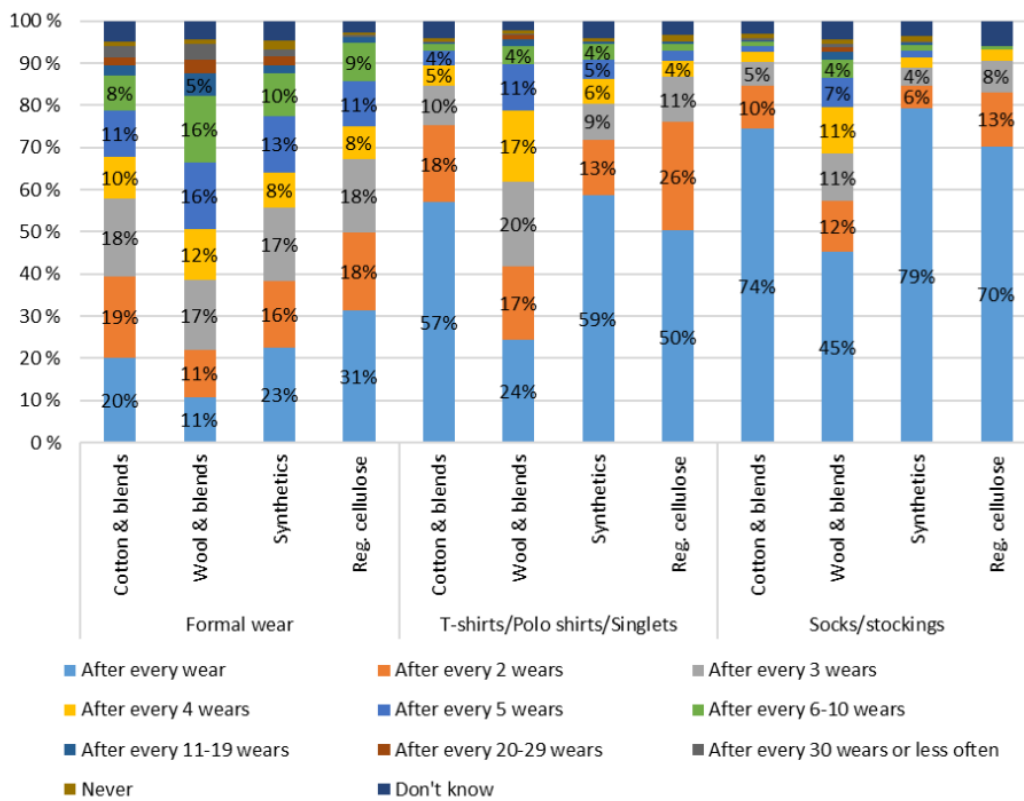
6315

6316 The wardrobe survey conducted by Klepp et al. assessed the cleaning frequency among its respondents.
 6317 However, there is a big variability among respondents as 39% of them washes the apparel item after every
 6318 wear, 14% after every 2 wears, 11% after every 3 wears and 29% after every 4 wears or more (Klepp et al.,
 6319 2020a).

6320 The study conducted by Laitala et al., 2018a presents an overview of studies that provide the average count of
 6321 wear instances before laundry for distinct types of apparel. It indicates that fibre types are an important factor
 6322 in determining the number of uses before washing (Laitala et al., 2018a) and overall influence the washing
 6323 frequency (Laitala et al., 2020)

6324 When it comes to differences in the washing of textile categories and fibres, survey data of 23.392 apparel
 6325 representing five countries show that socks are washed more frequently compared to t-shirts and formal wear
 6326 **Figure 55**. In terms of fibres, apparel made out of wool are washed less often compared to other fibres (Laitala
 6327 et al., 2020).

6328 **Figure 55.** Frequency of wash or dry clean per fibre content



Source: Laitala et al., (2020).

6329
 6330

6331 The type of materials is likely to influence how often apparel is washed, as synthetic fabrics like polyester or
 6332 polyamide are prone to retaining strong body odours compared to apparel made from natural materials like
 6333 wool or cotton (Klepp and Laitala, 2023b).

6334 Additionally, even identical types of apparel may undergo washing at distinct frequencies across various
 6335 countries. A study comparing laundering habits in five countries revealed that, for instance, the Japanese tend
 6336 to launder their formal wear less frequently (after an average of 8.8 wears) compared to Chinese and American
 6337 consumers, who wash them after 3.3 and 3.6 wears, respectively (Laitala et al., 2020). In this context, laundry
 6338 washes include the generic pre-programmed settings the washing machine runs to complete its work (washing,
 6339 rinsing, and spinning phase). In view of this, Italy has the highest (5.9) number of laundry washes per week,
 6340 while Germany has the lowest (4.0). However, the number of laundry washes per week have decreased since
 6341 2016 in Denmark (from 5.5 to 4.5 per week), Germany (4.4 to 4.0) and The Netherlands (6.0 to 4.8) (WRAP,
 6342 2019).

6343 The stronger users feel about the fact that washing apparel less often is not a habit a clean person would
6344 follow, the more often they wash. This association of less washing with poor hygiene is also linked to our image:
6345 we want to appear to others as a “clean” person, because that is the social norm (D&B, 2020a). Additionally,
6346 the more annoying users find the washing of apparel, the less often they do this. Individual beliefs about hygiene
6347 and convenience play a role in how often users wash their apparel. Factors such as time, money and
6348 environmental convictions do not seem to play a role in the frequency of washing apparel (D&B, 2020a).

6349 In general, users do not only throw their apparel in the laundry bin when they are actually dirty, but also ‘after
6350 wearing them several times’. The latter reason indicates customary behaviour also supported by the literature:
6351 the majority of people do not check whether the apparel are dirty before putting them in the laundry bin because
6352 they are used to washing them after a certain number of wears (D&B, 2020a).

6353 It is important also to consider that the cleaning process itself may have environmental and lifespan
6354 implications. Frequent laundering may accelerate the wear and tear on apparel, indirectly reducing their total
6355 lifespan. If laundering fails to effectively remove stains or odours from apparel, it can lead to premature
6356 disposal of apparel (Klepp and Laitala, 2023b). As established in the study based on the survey conducted by
6357 Laitala and Klepp (2020), apparel that are laundered less frequently exhibit longer lifespans. Those washed less
6358 often than every 30 wears have lifespans up to 4.8 years longer than those washed after each wear. On top of
6359 that, apparel washed after each wear are used 94 times less compared to apparel washed less often (washed
6360 every 30 wears) (Laitala and Klepp, 2020a). Nonetheless, it shall be noted that particularities in laundry
6361 frequency behaviour may apply for instance to sportswear. Their type of use and in some cases, distinct fibre
6362 and fabrics, could differ significantly from everyday casual wear apparel (Wei et al., 2020). In particular, certain
6363 types of sportswear can quickly absorb sweat and may also lead to unpleasant odours. This odour can create
6364 social awkwardness and discomfort for both the wearer and those around them (Chang and Wang, 2023).
6365 Therefore, washing sportswear promptly after one single use is generally done by users (Brice and Thorpe,
6366 2021).

6367 As a result, in addition to the frequency of washing, the examination of lifespan can also involve evaluating the
6368 number of cleaning cycles that the specific apparel item can endure in technical assessments or the number of
6369 cleaning cycles they generally experience during consumer studies. This approach may provide more consistent
6370 insights into the durability and potential longevity of apparel.

6371 10.6.2.3 Choice of softeners and detergents

6372 According to a 2017 A.I.S.E survey, compared to 2008, fewer consumers are reading information on detergent
6373 packaging. Nonetheless, in 2017, 52% claimed to read it before purchasing a product, and 60% mentioned
6374 doing so before using the product (A.I.S.E, 2017c). However, it appears that a majority of consumers continue
6375 to dose detergent arbitrarily, as indicated by A.I.S.E in 2020 hence overdosing is a common mistake, contributing
6376 to increased environmental impact and less effective washing results due to poorer rinsing effects (Paloviita
6377 and Järvi 2008 as cited in Klepp and Laitala, 2023).

6378 Interestingly, when consumers’ attention is compelled, the average time spent on a detergent label is
6379 approximately 20 seconds, irrespective of the label size or content (A.I.S.E, 2017c). When asked if consumers
6380 deliberately check composition information, 37% of European consumers responded affirmatively. They do so
6381 primarily to compare products (59%), avoid specific substances (29%), assess the quantity of a particular
6382 substance (28%), or because they are allergic to a specific substance (24%).

6383 Fabric softeners, also known as fabric conditioners, are chemicals originally developed to reduce static electricity
6384 in synthetic fabrics and are now more commonly used to soften cotton, ease ironing and add fragrance to
6385 laundry (Klepp and Laitala, 2023b). Studies suggest that softeners are utilized in about 55% of washing cycles
6386 in Europe (Stamminger 2016 as cited in Laitala 2023), with significant national variations. In Norway,
6387 approximately 61% of the population use them often, 19% occasionally, and 19% never (Laitala, K., M.
6388 Kjeldsberg, and I.G. Klepp 2012 as cited in Klepp and Laitala, 2023), while in Hungary and Romania, only about
6389 5% use softeners in all wash cycles, and 60% never use (Stamminger 2016 as cited in Laitala, K., M. Kjeldsberg,
6390 and I.G. Klepp 2012 as cited in Klepp and Laitala, 2023).

6391 Further details on the A.I.S.E, 2017a survey results on laundering habits can be found in **Table 88**.

6392 In conclusion, economic factors, such as the price and promotions, play a substantial role in users’ choices of
6393 laundry products. Sustainability is an important criterion for a significant portion of respondents, but less
6394 important than economic aspects. There is still a segment of users that may add more or less detergent than
6395 recommended as it happens with the dosing of softeners.

6396 10.6.2.4 Consumer awareness on microplastic release during washing cycles

6397 A structured survey among 411 Belgium citizens respondents spanning all age groups, aimed at gauging
6398 consumer awareness regarding microfiber pollution and its influence on washing habits (Herweyers et al., 2020).
6399 Overall, 68% of respondents are aware of the plastic pollution issue. Conversely, only 37% are aware of
6400 microfiber pollution and its association with the problem. Individuals under 25 exhibit the lowest awareness of
6401 synthetic fibre pollution (29%). Those aged 41 to 60 and over 60 are the most knowledgeable about the issue,
6402 yet still, less than half of respondents in these age groups are aware of synthetic fibres' potential harm (43%)
6403 (Herweyers et al., 2020).

6404 **Table 88.** Summary of surveys on laundering habits related to apparel

Publica tion	Sample details & characteristics of the study	Country	Washing Habits										
			Choice of laundry detergents and/or softeners by users expressed in % of respondents					Laundry detergents dosage habits per user expressed in %					
			Total price of the box	Specials offers and promotions	The detergent form (i.e. liquid/po wder)	The fragrance	Sustainabil ity criteria	Aware of the dosing instructi ons on the package	Find it easy to dose laundry deterge nts	Usually measure the quantity of deterge nt to be used	Check the package for dosing instructi ons	Add more detergent than recomme nded	Add less detergent than recommen ded
A.I.S.E (2017)	4 611 participants (aged 18-65) 200 respondents per country. No details on the demographic or social factors of the subjects.	23 European countries	78	71	70	71	Ranked lower than the economic criteria ^(a)	63	74	62	50	24	23

6405 *Source: own production based on references indicated in the first column of the table*

6406 10.6.2.5 Drying

6407 Apparel undergoes diverse drying methods, all of which involve air, causing moisture to evaporate and be carried
 6408 away. The tools employed by consumers include an array of drying racks and cords utilized both indoors and
 6409 outdoors, drying cabinets, dryers, and dedicated drying spaces, such as drying ceilings with or without heating.
 6410 The prevalence of tumble dryers varies significantly even among Western countries, with the USA leading at
 6411 approximately 80% of households owning one (Engelberg and Brassell, 2019), while the European average
 6412 stands at around 32% of households (De Almeida et al., 2011).

6413 The data from surveys conducted by Laitala et al. (2020) and GINETEX (2017) provide insights into the
 6414 prevalence of specific drying methods among participants from different countries and age groups.

6415 A summary of surveys related to drying of apparel is available in **Table 89**.

6416 **Table 89.** Summary of surveys related to drying of apparel

Publication	Sample details and characteristics of the study	Country	% of users per drying method ^(a)			
			Tumble-drier	Shared tumble-drier	Line dried indoors	Line dried outdoors (natural drying)
Laitala et al. (2020)	1 111 participants Age groups: 18-29 years, 30-49 years and 50-64 years	China, Germany, Japan, United Kingdom and USA	32.5	8	33	27
GINETEX (2017)	6 000 participants (aged 18-65)	Germany, United Kingdom, France, Italy, the Czech Republic and Sweden	NA	NA	NA	62

6417 (a) Whether the results per drying method depend on where the user lives in, is not reported by the studies

6418 *Source: own production based on references indicated in the first column of the table*

6419 10.6.2.6 Ironing

6420 The final stages of the domestic laundry process involve employing techniques to shape, structure, and refine
 6421 the appearance of freshly washed fabrics, a step commonly achieved through ironing (Klepp and Laitala,
 6422 2023b). In contemporary times, the amount of time dedicated to ironing has notably decreased, particularly
 6423 over the past few decades (Klepp and Laitala, 2023b). As it seems, ironing is one of the procedures consumers
 6424 dislike the most (Yun et al., 2017).

6425 Ironing practices exhibit significant variations not only between countries and consumer demographics but also
 6426 among different types of apparel. In Norway, the statistics indicate diverse ironing habits, with approximately
 6427 12% of adults ironing on a weekly basis, 40% opting for monthly ironing, 28% engaging in less frequent ironing,
 6428 and 20% asserting that they never iron anything (Laitala, IG Klepp, et al., 2018b). Notably, a higher proportion
 6429 of men and younger respondents tend to forgo ironing, in contrast to women and elderly respondents (Klepp
 6430 and Laitala, 2023b).

6431 On a different note, the care labels on textiles often contain symbols indicating whether the apparel can be
 6432 ironed and if so, the most appropriate ironing setting. In some cases, the ironing symbol may be accompanied
 6433 by dots. The number of dots indicates the temperature ranges for ironing. Ironing at a hot setting can also
 6434 contribute to the shrinkage of apparel (Chartered Textile Technologist interview as cited in Cooper and Claxon
 6435 2022).

6436 10.6.2.7 Storage after washing and drying

6437 The folding and storage of apparel after being washed and dried may have influence on the lifespan of apparel.
 6438 The way users store their apparel may affect the intrinsic quality they have. Nonetheless, no studies have been
 6439 found that address the folding and storage of apparel after being washed and dried. Rather some studies on
 6440 the user behaviour related to the storage of inactive or no-longer-worn-apparel have been identified and are
 6441 presented in Section 10.6.2.10.

6442 10.6.2.8 Following apparel care label instructions

6443 Care labels may indicate the recommended washing temperature, cycles, detergent to be used, and the way
6444 apparel should be hanged while still damp, among other things (Cooper and Claxton, 2022b).

6445 Survey evidence (**Table 90**) suggests that a significant percentage of users across various countries tend to
6446 follow care instructions on apparel labels, often with reasons including avoiding washing problems and
6447 preserving apparel. Both, GINETEX (2017) and GINETEX (2019) surveys report a similar percentage of users
6448 (70%) who always follow textile care instructions, suggesting consistency in this behaviour across the two
6449 studies. Moreover, the surveys from GINETEX (2017) and AB-REOC and BV-OECO (2019) indicate that around
6450 58% of users follow the care instructions often. This is in line with [Ribeiro et al., \(2023\)](#) study where roughly
6451 53 % of 1 056 Portuguese consumers typically adhere to label instructions for washing and drying their apparel.

6452 Despite consumers recognizing the influence of care and laundering practices on the lifespan of their apparel,
6453 adherence to care labels diminished after the initial wash, as indicated by McLaren et al. 2015. In the present
6454 survey, 47% of participants acknowledged generally reading apparel care labels. However, when specifically
6455 asked about reading care labels for T-shirts, 59% indicated doing so either at the point of purchase (10%) or
6456 before cleaning/after use (49%). The percentage of participants who abstained from reading care labels entirely
6457 decreased with an increase in T-shirt price. Moreover, survey results from Cotton Incorporated's Lifestyle
6458 Monitor revealed a declining trend in the number of consumers who 'always' or 'usually' read care labels before
6459 laundering apparel (2003—77%; 2007—64%; 2009—57%), with younger consumers (under 35 years)
6460 displaying a reduced inclination to read care instructions.

6461 Furthermore, evidence suggests that there appears to be an imbalance between the essential information
6462 consumers need and the volume of details provided on physical care labels in apparel (Evaluation report of the
6463 Textile Labelling Regulation, under development). This results in user practices such as cutting labels out
6464 reflected in the GINETEX (2017) survey where 62% of the respondents would do so (GINETEX, 2017a). The fact
6465 that there are consumers who tend to cut the care labels is also observed in disposed textiles which are collected
6466 with missing labels. This affects both, the reselling potential of apparel and their preparation for reuse (WRAP,
6467 2017c; Cura et al., 2021; European Commission. Directorate General for Internal Market, Industry,
6468 Entrepreneurship and SMEs, 2021). There are variations in behaviours and opinions, with some users finding
6469 care labels uncomfortable (when wearing the apparel item) or too long. GINETEX (2017) report the behaviour
6470 of cutting out care labels, suggesting that a portion of users across different countries may engage in this
6471 practice. In parallel, 39% of 6 000 consumers in Germany, United Kingdom, France, Italy, the Czech Republic
6472 and Sweden would never or rarely buy a piece of apparel without a label, where French consumers may bring
6473 up the average with 67% of 1 000 users reporting so (COFREET, 2023).

6474 There is also a desire for more convenient access to care instructions, such as having them directly on the sewn
6475 label or accessible through a QR code on a smartphone reported by 65% and 17%, respectively, of 1 000 French
6476 survey participants (COFREET, 2023). Similarly, when 1 056 Portuguese consumers were asked how they prefer
6477 to access product information in apparel, 49.75% indicated that they favour getting this information directly
6478 from the product label. Meanwhile, 33.7% showed a preference for using visual codes, such as QR codes or
6479 barcodes, to obtain the information (Ribeiro et al., 2023).

6480 Regarding clarity and transparency of content, approximately half of the respondents in the TLR Public
6481 Consultation (117 out of 234) indicated that the information is somewhat clear and transparent. Meanwhile,
6482 27% (64 out of 234) felt that the clarity and transparency are limited, and around 18% (28 out of 234) believed
6483 the information is largely clear and transparent (Evaluation report of the Textile Labelling Regulation, under
6484 development).

6485 The inclusion of multiple European countries in GINETEX (2017) and GINETEX (2019) contributes to a broader
6486 representation. The representativeness may vary based on the scope of coverage. However, these sources offer
6487 an overview of common specific behaviours, such as attention to labels, indicate low variability in user practices.
6488 The representativeness is influenced by the extent to which these behaviours are widespread.

6489 While the data provides percentages of users following care instructions and engaging in specific behaviours
6490 related to care labels, the reasons behind these behaviours are not extensively detailed. Understanding the
6491 motivations behind user actions could enhance the representativeness of the findings. Nonetheless, the data
6492 provide valuable insights into the way users follow care instructions and engage in specific behaviours related
6493 to care labels.

6494 Further details on surveys about user behaviour interaction with apparel care labels can be found in **Table 90**.

6495

6496 **Table 90.** Summary of surveys on user behaviour interaction with apparel care labels

Publication	Sample details and characteristics of the study	Country	% of users who follow the textile care instructions			% of most repeated reasons to follow the care instructions according to users			Other behaviour and opinions related to apparel care labels expressed in % of users					
			Average for the EU population	Follow them 'Always'	Follow them 'Often'	To avoid washing problems such as shrinking	Follow the care label to preserve their apparel and keep them longer	Never or rarely buy a piece of apparel without a label	Find the care labels Useful	Cut the care labels out	Think that care labels itch and irritate the skin	Think that care labels are often too long and uncomfortable	Want to find the maintenance instructions directly on the sewn label on the apparel	Want to consult them on smartphone via a QR code.
GINETEX (2017)	6 000 participants (aged 18-65)	Germany, United Kingdom, France, Italy, the Czech Republic and Sweden	70	13	57	38	31	39	NA	62	74	55	NA	NA
GINETEX (2019)	7 000 participants (aged 18-65)	France, Germany, the Czech Republic, the United Kingdom, Sweden, Italy and Spain	70	NA	NA	NA	NA	NA	82	NA	NA	NA	NA	NA
AB-REOC and BV-OECO (2019)	1 756 Belgian residents (aged 16-80)	Belgium	NA	NA	58	NA	NA	NA	NA	NA	NA	NA	NA	NA
COFREET (2023)	1 000 French residents (aged 18-65)	France	NA	NA	NA	NA	NA	67	NA	NA	NA	NA	65	17

6497 Source: own production based on references indicated in the first column of the table

6498 On a different note, in the investigation conducted by Wakes et al. in 2020, it was observed that the price of
 6499 the T-shirt had an impact on individuals' attitudes towards care labels: a lower purchase price correlated with
 6500 a lower likelihood of adhering to care instructions. For T-shirts priced above the lowest tier, over 40% of
 6501 participants followed care instructions before cleaning or after use. Notably, purchasers of higher-priced T-
 6502 shirts exhibited a greater tendency to read care labels at the point of sale compared to those who bought lower-
 6503 priced T-shirts (Wakes et al., 2020a). The Wakes et al., (2020) study was conducted in New Zealand, among
 6504 females from 18–25 years.

6505 The extent to which users associate a care label symbol to its corresponding care instruction is collected in
 6506 **Table 91**. Survey evidence indicates that there seems to be a consistent understanding across symbols among
 6507 participants in both, the GINETEX (2017) and AB-REOC and BV-OECO (2019) surveys. There is a demonstrated
 6508 high level of understanding for the ironing symbol, with almost all respondents in both surveys correctly
 6509 associating it with the care instruction. The washing symbols also show a strong association, with 91% in
 6510 GINETEX (2017) and 89% in AB-REOC and BV-OECO (2019) correctly connecting the symbol with the care
 6511 instruction.

6512 **Table 91.** Summary of surveys indicating the extent to which users associate a care label symbol to its corresponding
 6513 care instruction.

Publication	Sample details and characteristics of the study	Country	% of users who correctly associate the care label symbol with the care instruction				
			Ironing symbol	Washing symbols	Bleaching symbol	Drying symbol	Professional cleaning symbol
GINETEX (2017)	6000 participants (aged 18-65)	Germany, United Kingdom, France, Italy, the Czech Republic and Sweden	97	91	33	32	21
AB-REOC and BV-OECO (2019)	1756 Belgian residents aged between 16 and 80	Belgium	98	89	28	24	15

6514 *Source: own production based on references indicated in the first column of the table*

6515 However, there is a notable decrease in the correct interpretation and understanding of the bleaching, drying
 6516 and professional cleaning symbols and their respective care instructions among the participants of the two
 6517 surveys. This suggests that users may find the bleaching, drying and professional cleaning symbols less intuitive
 6518 compared to other symbols.

6519 While both surveys provide insights into user associations, the GINETEX (2017) survey encompasses a broader
 6520 international scope, involving participants from Germany, the United Kingdom, France, Italy, the Czech Republic,
 6521 and Sweden. In contrast, AB-REOC and BV-OECO (2019) focuses specifically on Belgian residents. Despite this
 6522 difference, the overall patterns in user understanding of care label symbols are comparable between the two
 6523 surveys.

6524 10.6.2.9 Repairing

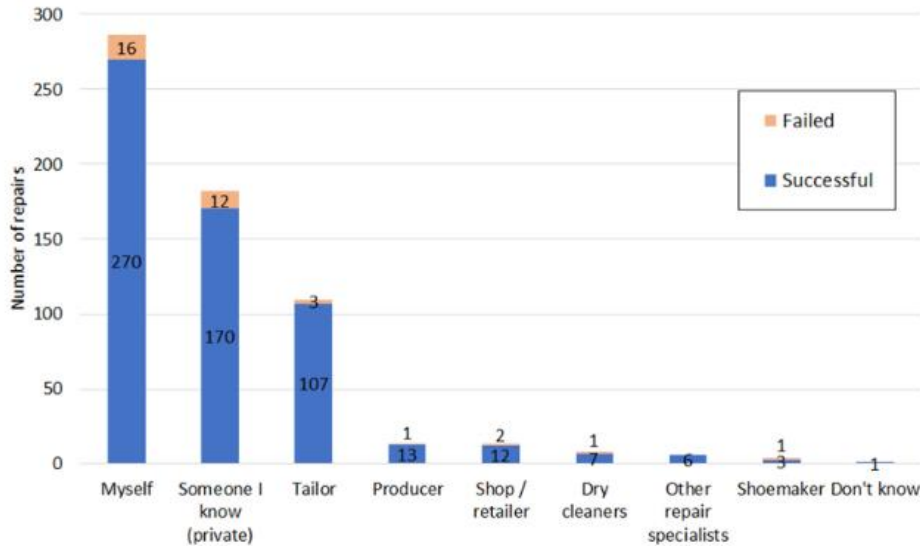
6525 Consumers nowadays have a quite transitory relationship with their apparel as they are often disposed before
 6526 they are worn out or broken. Reasons for this may be related to overconsumption and the fact that it is easier
 6527 and more convenient to replace the unwanted apparel for certain new items rather than repair or modify them
 6528 (Harris et al., 2016). The degree of emotional product-person attachment also influences whether users are
 6529 willing to engage in repairing certain apparel items (Terzioğlu, 2021; EEA, 2022a). The product-person
 6530 attachment is described in Section 10.6.3.3.

6531 Consumers can repair their apparel by themselves in private households or at a professional repair shop (EEA,
 6532 2022a). The apparel repair industry appears to be predominantly comprised of independent repairers operating
 6533 as small businesses, often with the owner and a few employees, if any. However, there is a lack of detailed
 6534 information about the characteristics of this business sector, as European statistical data (Eurostat) on the
 6535 professional repair of textiles is not available separately (EEA, 2022a).

6536 **Figure 56** reflects that most of the apparel repairs are carried by the user followed closely by somebody the
 6537 user knows, e.g. family member. Bringing the apparel item to repair to a tailor comes as third option. It shall be
 6538 noted that most repairs are successful in the three repair options users usually opt for.

6539 **Figure 56.** Number of successful and failed repairs done by different actors (total 625 repairs)

6540



6541

6542

Source: Laitala et al., 2021

6543 A survey in Ireland discovered that 45% of consumers pay to have their apparel repaired while 34% ask family
 6544 or friends to help them with the repairs. The same survey revealed that around 48% of users would like to
 6545 repair apparel but do not have the equipment to do it or do not know how to do it. Only 23% of people agree
 6546 they are not interested in repairing. Interestingly, this behaviour tends to be more common among consumers
 6547 who purchase apparel often and among young men (EPA Circular Economy Programme and B&A, 2021).
 6548 Moreover, a survey among 200 Dutch consumers showed that consumers are more likely to help their loved
 6549 ones with apparel repairs rather than other acquaintances and unknown people (milieu centraal, 2021).

6550 69% of the over 1 000 respondents to a survey in Spain confirm to know where to bring their apparel and shoes
 6551 for repair (CECU and Amigos de la Tierra, 2022). 67.4% of them add that, if apparel had a label indicating to
 6552 what extent the product can be repaired, they would use this as a criterion to decide whether to purchase or
 6553 not the apparel (CECU and Amigos de la Tierra, 2022). Additionally, 52% of 2 000 surveyed consumers declare
 6554 repairing or bringing their apparel to repair (CECU, 2023).

6555 Furthermore, according to Terzioğlu (2021), individuals typically weigh the costs and benefits before deciding
 6556 whether to repair an item. For example, how easy is to find a repair solution compared to the price of an apparel
 6557 item influences the user's decision to engage in repairing activities. As a result, the consumer's trust in
 6558 commercial repair shops could be promoted by improving the transparency of prices, quality and repair time
 6559 for example. This would help overcoming the barriers affecting the repair of apparel (EEA, 2022a).

6560 Repair skills for apparel are ceasing to exist. Recent research on sewing skills shows that while different sewing
 6561 instructions are readily available on the Internet, the main incentive for sewing is trust in one's own skills. A
 6562 study focused on textile repair in the United Kingdom found that citizen's lack the skills needed to repair
 6563 compared to previous generations. According to researchers, the decrease in skills is due to the fact that they
 6564 are no longer taught in schools and the lack of time and equipment in everyday life (Finnish Ministry of the
 6565 Environment, 2023a).

6566 Laitala and Boks 2012 indicate that users decide to mend their apparel depending on whether they have sewing
 6567 skills. A relevant number of consumers report to be able to sew a button on (Table 93), and have done so in
 6568 the past year (Table 92). On the contrary, replacing the zipper is highlighted as a demanding repair which can
 6569 be seen by the low rate of users who replaced it in the past year (Table 92) and who are confident about doing
 6570 such work (Table 93). If the zipper breaks, the apparel is disposed unless a strong person-product attachment

6571 exists (Laitala and Boks, 2012). Nonetheless, the users who still may be able to adequately repair apparel may
 6572 not feel the need to do so anymore (Harris et al., 2016). Moreover, a survey discovered an attitude-behaviour
 6573 gap among 2 500 users as 58% of them declared to find apparel repair as important while only 23% of them
 6574 engaged in repair activities (Heiny and Schneide, 2021). This is largely due to the reason indicated above: for
 6575 some consumers it is more convenient and easier to replace undesired apparel with new items rather than
 6576 opting for repair or modification (Harris et al., 2016).

6577 **Table 92.** Summary of surveys that provide the percentage of respondents who have made repairs to their apparel in the
 6578 past year.

Publication	Sample details and characteristics of the study	Country	% of respondents who have made different repairs to their apparel in the past year						
			Has sewn a button	Fixed seams	Patched apparel	Repaired holes or worn areas in the apparel (darning)	Lengthen or shorten pants (take a hem up or down)	Adjusted size/fit	Changed zipper
Laitala and Boks (2012)	Survey year: 2010 268 participants (aged 15-60+) Survey selection is female dominated (83%)	Norway	73	55	31	27	26	16	10
Laitala and Boks (2012)	Survey year: 2011 1 124 participants (aged 18-60+) Gender of participants equally represented	Norway	64	52	34	NA	NA	NA	NA
Laitala and Klepp (2018)	Survey year: 2011 1 001 participants (aged 18-60+) Gender of participants equally represented	Norway	51	41	NA	25	NA	NA	NA

6579 *Source: own production based on references indicated in the first column of the table*

6580 The data collected regarding the respondents who have made repairs to their apparel in the past year (**Table**
 6581 **92**) refers to their own willingness to repair and is not always correlated with the user repairing capabilities.

6582 The data collected in **Table 93** regarding how confident users are to repair their apparel is related to their own
 6583 willingness to repair and is not always correlated with the user repairing capabilities or skills. Additionally, a
 6584 summary of surveys that showcase how confident users are to mending their apparel depending on the type
 6585 of repair needed may be found in **Table 94**.

6586 **Table 93.** Summary of surveys that showcase how confident users are to mending their apparel depending on the type of
 6587 repair needed.

Publication	Sample details and characteristics of the study	Country	% of respondents who are confident undertaking apparel repairs				
			Sew a button on	Repair holes or worn areas in the	Lengthen or shorten pants (take a	Adjust size/fit	Changed zipper

				apparel (darning)	hem up or down)			
WRAP (2019)	Two waves of online surveys: Wave 1 was conducted in November 2016 and Wave 2 in June 2019. The sample size in 2016 was 1 000 per country. In 2019 the samples were as follows: Denmark 1 046; Germany 1 113; The Netherlands; 1 117 and Italy 1 226	Denmark (DK), Germany (DE), The Netherlands (NL) and Italy (IT)	DK 75 DE 75 NL 70 IT 69	DK 52 DE 46 NL 40 IT 48	DK 46 DE 30 NL 35 IT 32	DK 27 DE 17 NL 25 IT 36	DK 25 DE 25 NL 25 IT 29	DK 72 DE 69 NL 71 IT 61

6588 *Source: own production based on references indicated in the first column of the table*

6589 **Table 94.** Summary of surveys that showcase overall declared frequency of apparel repairs.

Publication	Sample details and characteristics of the study	Country	Overall declared frequency of apparel repairs without specifying the type of repair				
			% of users who have repaired apparel in the past 6 months	% of users who have repaired apparel in the past year	% of users who repair apparel often	% of users who repair apparel sometimes	% of users who never mended apparel
Laitala and Boks (2012)	268 participants (aged 15-60+) Survey selection is female dominated (83%)	Norway	NA	NA	35	51	14
EPA Circular Economy Programme and B&A (2021)	Survey year: 2011 1 000 participants (aged +16) Gender of participants equally represented	Ireland	NA	43	NA	NA	NA
CECU and Amigos de la Tierra (2022)	1 011 participants (+25)	Spain	67.3* (the question included footwear too)	NA	NA	NA	NA

6590 *Source: own production based on references indicated in the first column of the table*

6591 The aptitude to repair is the same or very similar disregarding the country. Denmark and German consistently
6592 rank higher in repair confidence across various activities, while the Netherlands and Italy generally exhibit lower
6593 but still varied confidence levels. These variations may stem from cultural, educational, or societal factors
6594 influencing attitudes toward apparel repairs in each country. However, all countries seem to have high level of
6595 confidence in sewing a button and repairing holes or worn areas in the apparel.

6596 Finally, there is also research such as [Laitala et al., \(2023\)](#) highlighting the importance on the need for clear
6597 guidelines defining what constitutes unacceptable wear and tear versus normal use, and distinguishing between
6598 commercial warranties and legal rights. Consumer's complaints on defective or faulty apparel items that fail to
6599 meet minimum lifespan requirements, serve as a valuable source of feedback for retailers to understand
6600 product performance especially with regards to durability.

6601 The apparel's general quality, and consequently its value, influences the consumer's decision on whether to
6602 consider it worthwhile to invest time and money in repairing. Hence, the importance of a good design that may
6603 also contribute to strengthen the emotional product-person attachment with the apparel.

6604 10.6.2.10 The storage of apparel

6605 The storage of apparel can be done for active or inactive apparel. Storing active apparel would be the action of
6606 placing inside wardrobes, for instance, all those apparel items that an individual wears regularly. In other words,
6607 the apparel that users move between use and storage frequently (Cluver, 2008a). Inactive apparel items
6608 constitute the apparel kept at home without being used for an undetermined time. These are represented by
6609 the over 30% of apparel stored in Europeans closets that have not been used for a year or even more time
6610 (European Parliamentary Research Service, 2019).

6611 Inactive apparel may comprise apparel that do not fit. In fact, this seems to be generally the case among
6612 consumers (Bye and McKinney, 2007). Therefore, why would consumers store items that are not able to use
6613 due to their body size? The wishful thinking that the apparel will eventually fit again may trigger the storing of
6614 these apparel. In certain cases, this practice may also help some consumers to monitor their weight. This
6615 temporary storage of inactive apparel, can be understood as keeping apparel that are not worn for an unknown
6616 time period before doing something different with them. Temporary storage may be done while the users are
6617 considering the best way to dispose the apparel, when waiting for the apparel to be back in fashion, to repair
6618 in the case of wear and tear or just because they want to make sure there was no longer a way to make use
6619 of the apparel (Cluver, 2008a). Interestingly enough is the fact that basic apparel that were once very necessary
6620 for the user, even though no longer in fashion and/or suffered wear and tear, were stored until new apparel
6621 were purchased to substitute them (Cluver, 2008a).

6622 Bye and McKinney, (2007) carried out surveys in which respondents indicated that inactive apparel could be
6623 linked to the past personality of the owner who no longer wants to be attached to, hence the reason not to wear
6624 them, but still feels like a part of their lives (Guy et al., 2001; Bye and McKinney, 2007). The respondents
6625 indicated that they hold onto apparel that were no longer used because they allowed them to recall important
6626 people and past experiences they had while wearing them (sentimental value). In other cases, the consumer
6627 keeps apparel that were purchased because of a wrong choice just to justify the price paid for them. Finally,
6628 some consumers keep certain apparel because a perceived aesthetic value attached to them. On a different
6629 note, around 13% of 350 000 Vinted users who are engaged in the resale of apparel items report to store in
6630 the closet the items that they do not manage to sell in the online platform Vinted, without the intention of using
6631 them (Vinted, 2021). In any case, it is important to note that prolonged inactive storage can eventually cause
6632 consumers to discard their apparel due to extended periods of non-use (Accenture, 2022).

6633 All in all, as indicated by Maldini et al., (2019) wardrobes can be seen as a "pull" system, where new apparel
6634 items are added only when unsatisfactory ones are replaced. Thus, delaying disposal should delay purchases,
6635 decreasing overall demand. However, in practice, wardrobes integrate new apparel items for various reasons,
6636 following unpredictable patterns. New items are frequently purchased without considering existing ones,
6637 pushing older apparel to the back as more attractive options come in. This behaviour may eventually result in
6638 disposing the apparel due to lack of space for new items (Accenture, 2022).

6639 It can be concluded that the storage of apparel items, whether temporary or not, seem to be strongly linked to
6640 a person-product attachment. Additionally, it should not be not assumed that longer apparel lifespans and
6641 delayed disposal always yield positive environmental impacts given the unpredictability of the users 'purchase
6642 and storage behaviour, as described above.

6643 **10.6.3 User behaviour regarding the disposal of apparel**

6644 10.6.3.1 Reasons for the disposal of apparel

6645 Disposal of apparel happens when a user transfers its ownership to another person or entity (Cluver, 2008a).

6646 Henninger et al., (2021) investigated 154 papers of which 32 touched upon the user behaviour related to the
6647 disposal of apparel items. Moreover, most of the studies were published after 2015 which showcases that it
6648 is a topic that is recently gaining more attention than in the past (Henninger et al., 2021).

6649 The intrinsic or physical durability can be defined as the ability of a product to withstand the tear and wear of
6650 time without its functionality and aesthetics being compromised. This is envisaged during the design phase of
6651 the product when the selection of materials, modelling, etc. focused on improving the robustness of the article
6652 (Alliance of Commerce and Deloitte, 2022).

6653 The intrinsic durability of apparel may be lost due to abrasion, colour changes, broken zipper, soiling that cannot
6654 get cleaned, etc. (Laitala and Boks, 2012). However, Laitala and Boks (2012) reported that the examination of
6655 disposed apparel showed that there is a great difference in opinions regarding when the apparel is too worn

6656 out to be used. Some users did not mind pilling or small holes, whereas for others, these changes indicated the
6657 apparel was worn out and were important disposal reasons.

6658 A composition analysis involving 391 composition samples from Swedish municipalities between 2012 and
6659 2014 revealed that 59% of apparel was in a condition suitable for reuse (SMED, 2016).

6660 However, a survey run by Cooper and Claxon in 2022 on 1 476 disposed apparel items unveiled various types
6661 of physical issues. The predominant problems were associated with colour fading, particularly in jersey and
6662 woven fabrics, and pilling in knitwear and jersey items. Fabric deterioration, characterized by fraying, especially
6663 around hems, as well as wear around the crotch of trousers and jeans, and accidental damage such as stains,
6664 tears, and rips, were also prevalent. Other forms of failure included the loss of dimensional stability, logo
6665 malfunction, discoloration, notably in the collar area of white shirts, holes in seams (including jacket linings),
6666 and trim failure. The percentages are calculated based on all apparel in the sample. Notably, 69% of all apparel
6667 exhibited either a colour-related or logo problem, while 75% experienced fabric-related issues, indicating that
6668 many apparel had multiple problems (Cooper and Claxton, 2022b). The physical failures found in disposed
6669 apparel are indicated in **Table 95**.

6670 **Table 95.** Recorded problems in apparel (% of all apparel items)

Type of Failure	%
Colour fading	53
Fabric breakdown	29
Accidental damage	29
Loss of dimensional stability	20
Logo failure	16
Discolouration	15
Hole(s) in seams	14
Trim failure	8

6671 *Source: Cooper and Claxton (2022).*

6672 The individual characteristics of the consumers, their habits, demographic context, product traits and quality
6673 seem to influence the user's decision to get rid of a product (Cluver, 2008; Goworek et al., 2012, as cited in
6674 Harris et al., 2016; Sandin et al., 2019).

6675 The perceived quality of a product is decisive when consumers decide to get rid of a piece of apparel, either
6676 because it seems to be worn-out or no longer functional (Aakko and Niinimäki, 2022). In fact, early disposal of
6677 apparel may be also accentuated by the loss of the symbolic perceived value of apparel for the consumer
6678 (Gwozdz et al., 2017a). Moreover, certain studies document that low quality, may trigger an early disposal of
6679 apparel (Piippo et al., 2022a). Additionally, the fact that some consumers often want to own new apparel
6680 shortens their time in use too (Klepp and Grimstad, 2001; Piippo et al., 2022a). This is the case for 45% of 982
6681 Italian consumers who indicated that they dispose their apparel items because of they are old (YouGov, 2019).
6682 Similarly, 7% of 1 000 Polish consumers indicated to get rid of apparel items as they lacked sufficient space
6683 for new ones (Accenture, 2022).

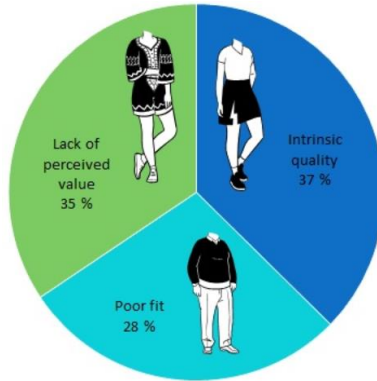
6684 The two most common reasons for the disposal of apparel for both, female and male German participants to a
6685 survey were material defects due to wear and tear and an inappropriate size. For German men, the third most
6686 common reason to dispose apparel is that it had fallen out of shape. This reason was also mentioned by the
6687 female respondents, but it was more often stated that the apparel simply was not liked anymore. In this regard,
6688 the female respondents from the youth group stand out. The percentage of those who disposed apparel because
6689 they no longer liked it is significantly larger in this social segment than among female respondents from other
6690 social environments and almost twice as much compared to the male respondents from the same social group.
6691 Reasons related to taste, fashion or personal style are more commonly mentioned among the young people
6692 (Kleinhüchelkotten et al., 2018a).

6693 The decision to dispose apparel, and how frequently it happens, is also influenced by the price of the apparel.
6694 There is evidence that consumers see higher value in more pricey apparel items (Morgan and Birtwistle, 2009b;
6695 Joy et al., 2012b). This means consumers tend to dispose more frequently the cheapest apparel as they
6696 understand that the value proposition in terms of durability and quality is lower (Lewis, 2015).

6697 Across all countries reported in **Table 96**, a significant percentage of participants cite intrinsic quality as a
6698 primary reason for the disposal of apparel, indicating a shared concern for durability and material integrity.
6699 Additionally, fit problems are a consistent factor influencing apparel disposal, suggesting that comfort and
6700 suitability play a universal role in user behaviour. Participants in most countries mention perceived value,
6701 indicating that subjective judgments, such as taste-related unsuitability, impact their decision to dispose

6702 apparel. These results are in line with the ones presented in the Laitala and Klepp, (2022) review of 17 consumer
6703 studies involving around 20 000 participants in which the most common reasons for apparel disposal were
6704 identified as intrinsic quality, perceived value and fit issues (**Figure 57**).

6705 **Figure 57.** Main reasons for disposal of apparel



6706
6707 *Source: Laitala and Klepp, (2022).*

6708 Finally, changing fashion trends contribute to apparel disposal across various countries, emphasizing the
6709 influence of style preferences on user behaviour.

6710 The overall implication of the data reported above is that the reasons for the disposal of apparel exhibit a
6711 complex interplay of individual factors. Quality and fit are universal concerns, suggesting a global emphasis on
6712 durable and well-fitting apparel. Cultural differences emerge in the importance placed on perceived value, taste-
6713 related aspects, situational reasons (e.g lack of space for new apparel), and responsiveness to fashion changes.

6714 While each study contributes valuable insights, the combined dataset offers a more comprehensive
6715 understanding of global apparel disposal trends. Variations in sample characteristics and the scope of data
6716 collection highlight the importance of considering multiple studies for a holistic perspective.

6717 **Table 96.** Summary of apparel disposal reasons in recent consumer studies with high number of participants.

Publication	Sample details and characteristics of the study	Country	Main reasons for the disposal (expressed in % of respondents)				
			Intrinsic quality (e.g worn-out items)	Fit issues	Perceived value (e.g. taste-related unsuitability)	Fashion changes	Other (e.g. Situational reasons, functional shortcomings)
<u>Greenpeace. (2015)</u>	1 011 participants	Germany	92	72	64	40	NA
<u>Ungerth and Carlsson. (2011)</u>	1 014 participants (aged 16-74)	Sweden	60	9	21	NA	4
<u>Laitala and Boks. (2012)</u>	546 participants (adult population, age groups not defined) 77% of the subjects were women and the 25-39 age group is overrepresented in comparison to the rest age groups	Norway	49	19	11	NA	19
<u>Laitala and Klepp (2020)</u>	1 111 participants (aged 18-65) Women and men are equally represented in all countries	China, Germany, Japan, United Kingdom, and USA	44	13	35	NA	9
<u>WRAP (2017b)</u>	2 058 participants	United Kingdom	18	42	33	NA	NA
<u>Lang, Armstrong, and Brannon (2013)</u>	555 participants	USA	30	31	39	NA	NA
<u>Morell-Delgado et al., (2024)</u>	1 439 participants	Spain	NA	44	21.5	NA	2.5
<u>YouGov. (2019)</u>	982 participants	Italy	60	47	16	12	2
<u>Accenture. (2022)</u>	1 000 participants	Poland	38	21	7	6	21

6718 *Source: own production based on references indicated in the first column of the table*

6719

6720 10.6.3.2 Disposal channels for apparel

6721 By 1 January 2025, mandatory separate collection of textiles will be set in the EU Member States as required
 6722 by Article 11(1) of the Waste Framework Directive. Additionally, the Commission has proposed the
 6723 establishment of mandatory extended producer responsibility (EPR) schemes designed to streamline and put in
 6724 place collection, sorting, reuse, preparation for reuse, and recycling infrastructure required to address the
 6725 material collected once the separate collection obligation takes effect²⁰⁷. Moreover, the on-going review of the
 6726 Textile Labelling Regulation is exploring whether to introduce specifications for physical and digital labelling of
 6727 textiles, including end-of-life disposal instructions and other circularity parameters based on requirements
 6728 under the proposed Regulation on eco-design for sustainable products and on the implementation of EPR
 6729 schemes across Member States.

6730 The person-product type of attachment plays a key role in how apparel may be disposed of. If there are positive
 6731 associations with a piece of apparel, this might be gifted to relatives or friends while if there is a negative
 6732 association the apparel may end up being donated, swapped or just disposed in the general waste bin (Joung
 6733 and Park-Poaps, 2013; Lewis, 2015). Throwing away (usable) apparel is associated with bad conscience and
 6734 moral aspects hence they are given to friends, family and charities as the preferred way to dispose of the
 6735 apparel (Klepp and Grimstad, 2001). Furthermore, selling apparel is among the alternative methods consumers
 6736 are using nowadays when they wish to get rid of apparel they no longer wear. In fact, 21% of 11 483 European
 6737 consumers sell their apparel online, and 59% of those do so more than once a year (YouGov, 2021).

6738 The surveys in **Table 97** show the most common disposal trends in different countries. In both surveys, donating
 6739 apparel to charity emerges as a popular choice among participants, indicating a shared inclination towards
 6740 contributing to charitable causes through apparel. Also, both surveys highlight the significance of giving apparel
 6741 to family and friends as a prevalent disposal method, suggesting a common practice of sharing apparel within
 6742 one's social network.

6743 By and large, the studies reported in **Table 97** provide valuable insights into apparel disposal practices. While
 6744 there are some differences in terms of the represented countries, the similarities in identified disposal methods
 6745 across the survey results suggest common trends in how individuals choose to handle apparel they no longer
 6746 need or use. The prominence of charitable donations and sharing within social circles appear to be consistent
 6747 behaviours, transcending geographical and cultural boundaries to some extent. The survey run by Vinted slightly
 6748 differs, as participants were asked what would they do with the apparel items that they did not manage to sell
 6749 in the online platform Vinted.

6750 **Table 97.** Surveys responses on main types of alternative apparel disposal

Publication	Sample and characteristics of the study	Country	Main types of alternative apparel disposal (expressed in % of respondents)			
			Donate to charity	Give to family/friends ²⁰⁸	Used as cleaning cloth ²⁰⁸	Discarded in the general waste bin at home
Koukouvinos (2012)	201 participants (aged 18-35) 75% of the subjects were women	Greece	51	59	45	NA
Laitala and Boks (2012)	546 participants (adult population, age groups not defined)	Norway	36	12	8	27
Vinted (2021)	350 000 participants	Belgium, Germany, Spain, France, Italy,	19	19	NA	Less than 1

²⁰⁷ Proposal for a Directive of the European Parliament and of the Council amending Directive 2008/98/EC on waste (COM/2023/420 final). Available here: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52023PC0420>

²⁰⁸ The quality of these products is unknown.

		The Netherlands, Poland and United Kingdom				
YouGov, (2021)	11 483 participants	France, Germany, Austria, Denmark, Finland, Italy, Norway, Spain, Sweden, Switzerland	69	34	NA	13
Morell-Delgado et al., (2024)	1 469 participants (aged 16 to more than 65) 68.8% of the subjects were women	Spain (survey sample focused on Catalonia Autonomous Community)	26	48.9	32.5	7.8

6751 *Source: own production based on references indicated in the first column of the table*

6752 Finally, it is also important to note that the primary finding of the European Commission's Directorate General
6753 Joint Research Centre (2021) study on the quality of clothing found in residual waste is the existence of a
6754 correlation between the proportion of separately collected clothing and the average quality and value of clothing
6755 discarded in residual waste. According to this study, this correlation is partly due to households making
6756 discerning decisions based on the perceived monetary value of apparel, determining which items are suitable
6757 for donation or resale for reuse and which have minimal potential for reuse. This idea is supported by a study
6758 conducted in Denmark in 2018 (Watson et al., 2018), which strengthens this theory. The study suggests that
6759 the 42 000 tonnes of clothing disposed of in Danish residual waste for incineration in 2017 had an estimated
6760 value of 12-15 million euros before disposal. In contrast, the 36 000 tonnes of clothing separately collected
6761 were sold on reuse markets for an estimated 65 million euros, indicating a value per tonne four to five times
6762 higher. As a result, it appears to be commonly understood that textiles with the least potential for re-use are
6763 more abundant in the textile portion of mixed municipal waste, but the limited existing research presents
6764 inconclusive results according to [Hyggens et al., 2023](#). Additionally, an analysis of 38 samples from across five
6765 Welsh local authorities emphasises the correlation between the method of textile collection and the reusability
6766 of the collected textiles. For instance, in Wales, the reusability rate of textiles collected via container stands at
6767 75.3%, compared to 54.6% for those gathered through door-to-door collection (WRAP Cymru, 2022). Last but
6768 not least, findings from [Morell-Delgado et al., \(2024\)](#) indicate that apparel perceived to be in better condition
6769 are typically disposed of in street containers for textile waste (78%), with minimal disposal in mixed-fraction
6770 containers (3%). Conversely, when apparel are in worse condition, citizens exhibit uncertainty regarding disposal
6771 methods, with approximately 30% disposing of them in specialized containers and another 30% opting for
6772 mixed-fraction containers. Therefore, the population's decision regarding the disposal destination of unwanted
6773 apparel seems to be influenced by the perception of the quality the item may still possess by the consumer
6774 (Morell-Delgado et al., 2024).

6775 10.6.3.3 Person-product attachment

6776 The emotional attachment formed between the apparel and the consumer is generally referred to as 'person-
6777 product attachment'. This type of connection between a textile item and the user has an influence on how long
6778 consumers own a textile and how often they make use of it. The person-product attachment is usually
6779 embedded in the term 'emotional durability' which goes beyond just functionality. The Ellen MacArthur
6780 Foundation report (Ellen MacArthur Foundation, 2021) defines emotional durability as: 'the product's relevance
6781 and desirability to a user, or multiple users, over time'. A product that holds emotional durability tells a
6782 compelling narrative, creates history with its users through bonding and aligns with their values.

6783 The ownership of apparel could be 'active' (i.e. use on a daily basis or several times a week), 'seldom' (use
6784 several times a year) or 'inactive or in storage' (very rarely or never use the apparel) (Niinimäki and Armstrong,
6785 2013).

6786 Niinimäki and Armstrong (2013) carried out a survey with over 400 participants from United States of America
6787 (45.1% were men). The sample ranged in age from 18 to 67: 18-24 (7.5%), 25-34 (27.4%), 35-44 (23.5%),

6788 45– 60 (28.1%), and over 60 (13.5%), most of whom were Caucasian/white (88.0%) and had completed a
 6789 college degree or higher (66.1%). **Table 98** collects the elements that generate person-product attachment
 6790 listed according to the number of times each of them were mentioned by the respondents to the questionnaire.

6791 **Table 98.** Elements that generate person-product attachment (Niinimäki and Armstrong, 2013).

Order of relevance	Element	Description (in order of most referenced by users)
1	Functionality	Comfortable Good fit Multi-function Functional (good for sports and hide body deformation) Easy to match Easy to put on
2	Memory	Memories (youth and childhood) Received from special person Family ties Remind of special person Represent membership to a group (e.g. team/band)
3	Emotional satisfaction	Look/feel good in it Receive compliments wearing the piece of apparel Love the brand
4	Design and style	Good design (e.g. cool looking) In style
5	Fabric and material	Nice colour Pleasant to touch (silky and soft) Fabric aesthetic (not thick, light weight, and sparky) Flexible (not stretched)
6	Personal values	Uniqueness Feel relaxed in it
7	Quality	Durable High quality in manufacturing High quality in material
8	Effort invested	Reward for self Hand made
9	Financial value	Price (good deal and very expensive)

6792 *Source: Niinimäki and Armstrong (2013).*

6793 The findings showed that apparel that were purchased brand-new turned out to have the highest emotional
 6794 attachment for the respondents. This is largely explained by the fact that there is a widespread idea of ‘new’
 6795 apparel as something that has a value in itself. New apparel are clean canvas, both in the sense that they are
 6796 physically clean, i.e. free of spots, presentable and hygienic, but it is also ‘mental clean’ in the sense that it is
 6797 free from stories attached to the apparel in question (Forbrugerrådet Tænk, 2022).

6798 Moreover, it is the frequently used regular T-shirts, dresses and jeans the ones respondents indicated to be
 6799 more meaningful to them. Functionality, a special memory, emotional satisfaction were the most repeated
 6800 attributes by the respondents that help promoting emotional attachment to apparel.

6801 The value found in new apparel is a major barrier to reuse and is also reflected in the fact that apparel are
 6802 used more when they are brand new than when they have several years. In fact, apparel purchased as second
 6803 hand are used 30 per cent less than those purchased as brand new (Forbrugerrådet Tænk, 2022). On top of
 6804 that, it should be noted that reuse may increase the possession span of the apparel, but does not necessarily
 6805 increase the use of the apparel (Forbrugerrådet Tænk 2022; Laitala and Klepp 2021).

6806 The durability and active use of apparel depends on the robustness and longevity of its materials but also on
 6807 the changing trends, needs and wishes of consumers. Emotional durability remains a forward-looking issue,
 6808 which is difficult to measure because it is intrinsically linked to consumer perceptions and brand representations.
 6809 Its understanding is based on social sciences concepts and there is no evaluation methodology that has been
 6810 fully tested (Alliance of Commerce and Deloitte, 2022).

6811 However, apparel may have a certain initial physical or functional lifetime that may be extended if a strong
 6812 product-user relationship is promoted by retailers. For instance, retailers can maximise the value of the apparel
 6813 they sold by ensuring that the design meets real long-term needs and that incorporates a particular added
 6814 value which prevents the user from an early disposal of the textile product (Niinimäki and Armstrong, 2013;
 6815 Alliance of Commerce and Deloitte, 2022). The aim would be to create articles that can be adapted to the
 6816 different stages of consumer life, integrating more modularity (multi-seasonality, reversibility, extensibility, etc.)
 6817 and facilitating alterations, or offering timeless products whose colours and shapes are resistant to changes in

6818 trends. To enhance the perceived value of their articles, brands can rely on personalisation levers or marketing
6819 methods such as co-creation, tailor-made manufacturing or limited series, which make it possible to create an
6820 emotional attachment of the customer to their apparel, while limiting promotions and the continuous inflow of
6821 novelties (Alliance of Commerce and Deloitte, 2022).

6822 Bottom line is the role of the quality of the apparel. Laitala et al., (2021) asked a number of consumers what
6823 aspects would incentivise them to wear their apparel longer. The most repeated answer both for men and
6824 women was if the apparel were of better quality. The same was concluded in [OVAM \(2021\)](#). Along the same
6825 lines, 92% of 101 visitors to a dress exchange at Greenpeace Hamburg declared that they would wear apparel
6826 for more than a year if they were of good quality. 89% of participants to the same survey indicated that if
6827 apparel maintained their shape and colour for a longer period would also incentivise them to wear apparel for
6828 longer. The third most commented reason for wearing apparel for longer was if there was a bonding with the
6829 apparel (product-person attachment) (Kleinhüchelkotten et al., 2019).

6830 All in all, the consumers deal with objects in different ways. This is the main reason why the product-user textile
6831 attachment is quite subjective and difficult to draw conclusions from. The designers may play an important role
6832 in stimulating the length of ownership and use of apparel when choosing the fabrics, the type of confectionary
6833 work and durable design. Research has referred this design as 'emotional durable design' which emphasizes
6834 creating enduring experiences over new products. The primary challenge is to develop something that captivates
6835 customers, encouraging them to cherish it rather than succumb to the desire for novelty ([Chapman 2015 as
6836 cited in Vanacker et al., 2022](#)). Through each design decision, the long-term customer satisfaction may be
6837 increased, resulting in a higher emotional user-product attachment. Nonetheless, there is also research
6838 indicating that strategies towards the promotion on person-product attachment showed that their effect had
6839 not been empirically validated (Maldini and Balkenende, 2017).

6840 10.6.3.4 Returns of apparel

6841 Convenience seem to be the main reason for buying online as reflected by half of the usual online customers
6842 in the survey run by AK Wienn and Greenpeace (2023). However, if the consumer lacks the time to return a
6843 parcel to a retailer with a non-flexible returns policy, he or she may be more selective when choosing what to
6844 buy to avoid having to keep the purchased items because the time to return the items is up. This may be one
6845 of the reasons why longer periods for free returning allow for ordering more apparel as the customer has a
6846 more relaxed approach to the potential returns. At the same time, it can happen that for some consumers
6847 returning online buy-outs is deemed a barrier because it becomes cumbersome to send it back, despite the type
6848 of return policy that the retailer may offer. This means that apparel that do not fit, or apparel that are not up
6849 to the customer's preference, end up stored in the cabinet (Forbrugerrådet Tænk, 2022).

6850 A study from the European Environment Agency retrieved that casual dresses and jackets have the highest
6851 return rate followed closely by jeans and vests (EEA, 2024). Interestingly, the same EEA study found that
6852 expensive products have more probability of being returned. An explanation for this behaviour has not been
6853 found.

6854 When it comes to demographics, it is not widely analysed in the scientific literature whether it is females or
6855 males who are more prompt to return apparel. A study pinpointed that women return more online purchases
6856 than men (AK Wienn and Greenpeace, 2023a). This seems to be supported by the fact that womenswear is the
6857 winner category of apparel when it comes to returns (British Fashion Council's Institute of Positive and Roland
6858 Berger, 2023). Moreover, young consumers are more likely to order online and return apparel more frequently
6859 as they tend to buy more apparel and order several sizes compared to other age groups (AK Wienn and
6860 Greenpeace, 2023a).

6861 According to the results of the Foresight Factory survey fit issues is the first reason for returns by consumers
6862 (Foresight Factory, 2021; Zimmermann et al., 2021). The second most popular reason to return apparel is taste-
6863 related unsuitability of an item and/or its product details for the consumer. In this category, the share of total
6864 returns in Zimmermann et al. (2021) corresponds to the dislike of the shape or cut of the apparel (16%), a
6865 dislike for the material (8%) and colour or pattern (6%).

6866 Online shopping often leads to mis-buying (Forbrugerrådet Tænk, 2022). The main reasons found in the
6867 literature for returning apparel are problems fitting the item and the dislike of the apparel by the consumer.
6868 These two reasons are followed almost equally by lack of quality of the apparel and receiving a faulty item. A
6869 survey run by Foresight Factory in 2021 with over 20 000 respondents, reports the same main reasons for
6870 returning apparel by consumers; 38% of them reported that the items did not fit well while 15% of respondents

6871 indicated that the apparel did not suit them. Quality was not enough for 14% of the survey participants and
 6872 13% of them received faulty items (Foresight Factory, 2021).

6873 'Bracketing' occurs when consumers purchase several identical or similar items, have them shipped, keep one,
 6874 and return the others (NRF and APPRISS RETAIL, 2023). It is interesting to see that in the study from
 6875 Zimmermann 2021, bracketing, is not among the main reasons for returning goods (Zimmermann et al., 2021).
 6876 A similar behaviour is reported by the survey from Foresight Factory, in which only 6 % of the respondents
 6877 explicitly indicated that they bought multiple sizes but did not intend to keep all the ordered items. The same
 6878 percentage of users reported that they purchased multiple styles without the intention to keep everything
 6879 (Foresight Factory 2021). Another reported behaviour linked returns is what is known as 'wardrobing'. This
 6880 happens when a consumer purchases an expensive item, wears it, and then returns it (NRF and APPRISS RETAIL,
 6881 2023). A survey focusing on retailers, highlighted that 48.8 % of them experienced wardrobing (NRF and
 6882 APPRISS RETAIL, 2023).. No data was found from consumers acknowledging this practice.

6883 The fitting issues that usually come with ordering apparel online are often linked to the inability of consumers
 6884 to interpret correctly the sizing scales offered in some online sites but there may be also cases of inconsistent
 6885 and not correct sizing (Vladimirova et al., 2022).

6886 Products with perceived low quality, less durability and the remorse of the consumer due to buying apparel are
 6887 also highlighted as potential reasons for returning apparel (Bernon et al., 2011).

6888 A lot of consumers have a look at the return policies before purchasing items online (Asdecker and Sucky, 2019;
 6889 Makov, 2023). In fact, 70% of consumers indicate that whether they repeat a purchase on a site or not, depends
 6890 on their return experience (Asdecker and Sucky, 2019). Nonetheless, it seems that most users assume that the
 6891 returned items are always put back into sale when this is not necessarily the case due to the complex reverse
 6892 logistics of the supply chain (Makov, 2023).

6893 In summary, with the data available, it is not possible to clearly distinguish between the behaviour regarding
 6894 apparel returns of men and women. Nonetheless, some studies stress that younger generations return more
 6895 items given their tendency to buy apparel more often. The influence different demographic aspects play when
 6896 returning products have not been possible to analyse.

6897 Reasons for returning items purchased online tend to have a common root: the difficulties users have choosing
 6898 the appropriate size and the right product based on the online descriptions. Furthermore, studies exploring the
 6899 reasons for returning products at physical stores have not been found. This may be because online returns are
 6900 comparatively much higher than those at physical stores. The impossibility for consumers to try the apparel on
 6901 the spot and have a tactile experience contributes to this difference in number of returns between the online
 6902 and physical store shopping.

6903 **Table 99.** Reasons for returning apparel to e-commerce

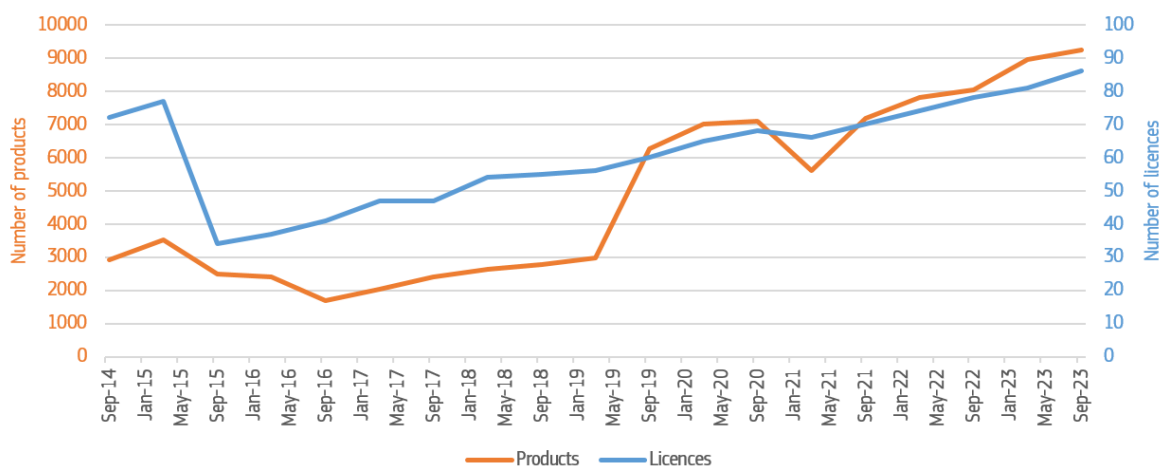
Publication	Sample details and characteristics of the study	Country	Reason for returning (expressed in % of respondents)				
			Fit issues	Taste-related unsuitability	Insufficient perceived quality	Faulty items	Change of mind
Foresight Factory (2021)	20 000 participants	United Kingdom, United States, Canada, Australia, France, Germany, Italy, Netherland, Norway, Japan, Saudi Arabia and UAE	38	15	14	13	8

6904 *Source: own production based on references indicated in the first column of the table*

6905 **10.7 Supporting information about environmental labels and current EU Ecolabel**
 6906 **criteria**

6907 **10.7.1 Figures of EU Ecolabel for textile products**

6908 **Figure 58.** Evolution of licences and products awarded with EU Ecolabel for textile products



6909 Source: own elaboration based on EU Ecolabel facts and figures ⁽²⁰⁹⁾
 6910

6911 **Table 100.** Figures of EU Ecolabel for textile products in September 2023

Licences			Products		
Competent body	Number	Percentage compared to the total number (%)	Competent body	Number	Percentage compared to the total number (%)
Denmark	24	28	Portugal	3854	42
Italy	18	21	Italy	3359	36
Norway	11	13	Denmark	1338	14
Austria	6	7	Sweden	172	2
Germany	5	6	Netherlands	164	2
Netherlands	5	6	Norway	161	2
Sweden	5	6	Poland	89	1
Czechia	3	3	Austria	50	1
Bulgaria	2	2	Czechia	31	0
Spain	2	2	Germany	14	0
Poland	2	2	Spain	9	0
Belgium	1	1	Bulgaria	7	0
Portugal	1	1	Belgium	1	0
Romania	1	1	Romania	1	0
Cyprus	0	0	Cyprus	0	0
Estonia	0	0	Estonia	0	0
Greece	0	0	Greece	0	0
Finland	0	0	Finland	0	0
France	0	0	France	0	0
Croatia	0	0	Croatia	0	0
Hungary	0	0	Hungary	0	0
Ireland	0	0	Ireland	0	0
Iceland	0	0	Iceland	0	0
Lithuania	0	0	Lithuania	0	0
Luxemburg	0	0	Luxemburg	0	0
Latvia	0	0	Latvia	0	0
Malta	0	0	Malta	0	0

²⁰⁹ EU Ecolabel facts and figures. Available at [this link](#). Last accessed on 12 January 2024.

Licences			Products		
Competent body	Number	Percentage compared to the total number (%)	Competent body	Number	Percentage compared to the total number (%)
Slovenia	0	0	Slovenia	0	0
Slovakia	0	0	Slovakia	0	0

6912 The licence is awarded to a company by a competent body. A licence can include the award of the EU Ecolabel to one or more products.
6913 The expression 'number of products' does not refer to the number of items related to a specific product.

6914 *Source: Own elaboration after consultation with EU Ecolabel Helpdesk*

6915 10.7.2 Contributions to the initial questionnaire

6916 **Table 101.** Type of respondents that contributed to the section on EU Ecolabel during the initial questionnaire

Type of respondent	Number	Percentage compared to the total (%)
University or research institute	2	6
Certified laboratory	0	0
Government (local, regional, or national)	6	18
Non-governmental organisation – Environment	2	6
Non-governmental organisation – Consumers	2	6
Industry – manufacturing	10	29
Industry – manufacturing - association	1	3
Industry – waste collection, sorting and treatment	0	0
Industry – waste collection, sorting and treatment - association	1	3
Distributor/Retailer	2	6
Distributor/Retailer association	1	3
Other	7	21
TOTAL	34	100

6917 Among the respondents of the questionnaire, 7 declared to be licence holders of the EU Ecolabel for textile products, and 4 declared to be
6918 competent bodies of the EU Ecolabel.

6919 *Source: own elaboration*

6920 **Table 102.** Suggestions received by respondents to the initial questionnaire on EU ecolabel criteria 1-9, which focus on
6921 fibres

Criterion	Suggestions
Criterion 1. Cotton and other cellulosic seed fibres	<ul style="list-style-type: none"> - Make sure that only fibre-to-fibre from post-consumer waste is accepted; - Analyse the real traceability of fibres; - Investigate regenerative farming; - Focus only on organic cotton, disregarding the Integrated Pest Management cotton; - Establish a clear distinction between organic cotton and transitional organic cotton; - Investigate the implications of different minimum percentages of organic cotton; - Extend the analysis of restricted pesticides to recycled cotton; - Consider the expansion of the restricted pesticides following Blue Angel and Oeko-Tex 100.
Criterion 2. Flax and other blast fibres	<ul style="list-style-type: none"> - Investigate the possible use of the European Flax standards developed by the Alliance for the European Flax-Linen and Hemp; - Revise the COD and TOC limits as absolute values.
Criterion 3. Wool and other keratin fibres	<ul style="list-style-type: none"> - Assess the possible inclusion of organic fibres; - Consider the inclusion of biological husbandry control; - Specify that also recycled fibres should be checked for ectoparasiticide; - Ban mulesing; - Investigate the possible inclusion of specific certified wool, e.g. recycled, responsible and regenerated wool; - Question the ambition of pH, COD and temperature limit values.
Criterion 4. Acrylic	Limit the residual acrylonitrile in raw fibres to 1.5 mg/kg.
Criterion 5. Elastane	Investigate the possibility to accept 5% of elastane if the current production of elastane does not involve a large use of organotin.
Criterion 6. Polyamide	<ul style="list-style-type: none"> - Extend the traceability along the entire value chain of any feedstock material: recycled or virgin; - Investigate the effectiveness of verification methods if production occurs outside EU; - Include thresholds of CO₂ emissions.
Criterion 7. Polyester	<ul style="list-style-type: none"> - Remove the distinction between consumers and commercial or public sector customers; - Allow only fibre-to-fibre recycling; - Analyse the traceability of fibres: virgin and recycled. - Decrease the limit of antimony and accept its verification via a test.

Criterion	Suggestions
	- Investigate the feasibility of verification of VOC emissions.
Criterion 8. Polypropylene	Investigate the relevance of VOC emissions
Criterion 9. Man-made cellulose fibres	<ul style="list-style-type: none"> - Increase the percentage of fibre coming from sustainable forestry management; - Include the regenerated fibres based on the FAO principles on sustainable forestry management; - Align the ambition of this criterion to the latest EU Ecolabel criteria for absorbent hygiene products; - Investigate how to better support applicants and CBs to check compliance with criterion 9(a); - Consider potential updates of the criterion 9(a) due to latest European Regulation; - Allow only use of organic cotton; - Question the ambition level of AOX emissions; - Investigate the use of the latest learnings about the Roadmap for cleaner viscose by Changing Market Foundation; - Investigate inclusion of other environmental impacts caused by the production of MMCF.

6922 *Source: own elaboration*

6923 **Table 103.** Suggestions received by respondents to the initial questionnaire on EU Ecolabel criteria 10-12, which focus on
6924 components and accessories

Criterion	Suggestion
Criterion 10. Filling	Include specific sub-criteria addressing: <ul style="list-style-type: none"> - animal welfare (e.g. prohibition of live plucking), - wastewater production, - hygiene requirements when downs and feathers are used.
Criterion 11. Coating, laminates and membrane	<ul style="list-style-type: none"> - Include limits about adhesives, organic solvents, and minimum recycled content; - Forbid the use of CFCs as foaming agents; - Include assessment of polyamide in criterion 11(b).
Criterion 12. Accessories	Extend the scope of accessories as done in the criteria of Blue Angel.

6925 *Source: own elaboration*

6926 **Table 104.** Suggestions received by respondents to the initial questionnaire on EU ecolabel criteria 13-16 and
6927 appendixes, which focus on chemicals

Topic	Suggestion
General points	<ul style="list-style-type: none"> - Cover the entire supply chain; - Simplify requirements revising their proportionality; - Explicitly report the chemicals that should be analysed; - Improve the comprehension of the criteria.
Criterion 13. Restricted Substances List (RSL)	<ul style="list-style-type: none"> - Provide directions about the random sampling; - Investigate the use of ZDHC Gateway; - Assess aspects related to Hercosett method on wool; - Transparently report intentionally added chemicals; - Forbid any ingoing SVHC regardless of their concentration; - Use other certification schemes, such as Oeko-Text Standard 100 and Bluesign, as criterion verification.
Criterion 14. Substitution of hazardous substances in dyeing, printing and finishing	<ul style="list-style-type: none"> - Include restriction to substances that hinder recyclability, and reassess those currently derogated; - Ban substances classified as H400; - Consider the expansion of the following hazard classes: Persistent, bioaccumulative, Toxic (PBTs), very Persistent very Bioaccumulative (vPvBs); Persistent, Mobile and Toxic (PMT), Very Persistent very Mobile (vPvM), endocrine disruption; - Investigate the possibility to completely exclude flame retardants, biocides and optical brighteners.
Criterion 15. Washing, drying and curing energy efficiency	Update the criterion considering the latest evolution of best available technologies.
Criterion 16. Treatment of emissions to air and water	<ul style="list-style-type: none"> - Update the criterion considering the requirements set by the latest EU-BREF; - Include emission parameters set by the latest version of the Blue Angel criteria; - Investigate verification methods which would facilitate the process when a facility is located outside EU.

Topic	Suggestion
Appendix 1. EU Ecolabel textile restricted substance list	<ul style="list-style-type: none"> - Analyse the possible ways to verify chemical requirements when the supply chain is outside EU. - Assess the possibility to include in the RSL: <ul style="list-style-type: none"> • All per and polyfluoroalkyl substances (some exemptions remain for outdoor use) • Flame retardants • SVHC regardless of concentration • Biocides (currently allowed for transportation and storage) • Nanomaterials • Phthalates • Elemental chlorine or hypochlorite • Metal complex dyes • APEOS also in end products • PFAS • Chlorinated solvents • Organotin compounds • Azo dyes - In (f), (ii) the term surfactant is redundant and the 95% is hard to interpret and calculate. - In verification column of (g), (ii) it can be more clear that non-use means no use of easy-care finish. - The term SDS could always be written as “SDS (updated REACH/GHS)” to prevent many outdated incomplete SDS.
Appendix 2. Dye restrictions	<ul style="list-style-type: none"> - Investigate latest updates adopted by other ISO Type I environmental labels and Oeko-Tex; - Consider inclusion of ZDHC MRSL v.3.0 or higher; - Analyse the possible ways to verify dye requirements when the supply chain is outside EU.
Appendix 3. Best available techniques in the field of washing, drying and curing energy efficiency	<ul style="list-style-type: none"> - Update the criterion considering the latest evolution of best available technologies; - For washing, assess formulations including surfactants (anionic and nonionic) together with polymers and enzymes with good cleaning performance at low temperatures.

6928 *Source: own elaboration*

6929 **Table 105.** Suggestions received by respondents to the initial questionnaire on EU Ecolabel criteria 17-25, which focus on
6930 fitness for use

Criterion/topic	Suggestion
Criterion 17. Dimensional changes during washing and drying	<ul style="list-style-type: none"> - Investigate latest updates adopted by other ISO Type I environmental labels; - Include examples of fabrics with interlock and chunky knit; - Include specific fibre groups that are missing; - Reassess the ambition level of the criterion.
Criterion 18. Colour fastness to washing	Investigate to include restriction to dry cleaning.
Criterion 19. Colour fastness to perspiration (acid, alkaline)	Verify if the depth method is still up to date; Investigate latest updates adopted by other ISO Type I environmental labels.
Criterion 20. Colour fastness to wet rubbing	Investigate latest updates adopted by other ISO Type I environmental labels.
Criterion 21. Colour fastness to dry rubbing	Investigate latest updates adopted by other ISO Type I environmental labels.
Criterion 22. Colour fastness to light	<ul style="list-style-type: none"> - Verify if the standard depth method is still up to date; - Investigate latest updates adopted by other ISO Type I environmental labels.
Criterion 23. Wash resistance of cleaning products	Investigate latest updates adopted by other ISO Type I environmental labels.
Criterion 24. Fabric resistance to pilling and abrasion	<ul style="list-style-type: none"> - Extend the possibility to verify the requirement using ISO 12945-3 (RTPT - random tumble); - Include more fibre groups. - Investigate latest updates adopted by other ISO Type I environmental labels.
Criterion 25. Durability of function	<ul style="list-style-type: none"> - Consider the possibility to include further durability aspects, as reported by latest publications; - Investigate aspects related to oil and stain repellence, which are connected to the use of PFAS; - Assess the exclusion of flame retardants.
Other	Include requirements on tear strength and zipper quality.

6931 *Source: own elaboration*

6932 **Table 106.** Suggestions received by respondents to the initial questionnaire on EU ecolabel criteria 26-28, which focus on
6933 Corporate Social Responsibility and supporting information

Criterion	Suggestion
Criterion 26. Fundamental principles and rights at work	<ul style="list-style-type: none">- Investigate the possibility to use the OECD Guidelines for Multinational Enterprises and the application to the entire value chain;- Assess the latest legislative developments reported in the proposal for the Corporate Sustainability Due Diligence Directive;- Change the headline to better reflects social aspects;- Include the ILO convention 190 and ILO Convention 185, or even going beyond the ILO core criteria;- Investigate the possibility to use other certifications, such as BSCI/Amfori, SMETA, to verify compliancy;- Align with the latest EU Ecolabel requirements for electronic displays and absorbent hygiene products.
Criterion 27. Restriction on the sandblasting of denim	<ul style="list-style-type: none">- Investigate the possibility to use the OECD Guidelines for Multinational Enterprises and the application to the entire value chain;- Restrict potassium permanganate.
Criterion 28. Information appearing on the Ecolabel	<ul style="list-style-type: none">- Investigate the possibility to include:<ul style="list-style-type: none">• a sentence about social aspects;• a specific recycled material content, with its traceability;• Information that sums up the requirements that the product meets;• the specific chain of custody model used for the traceability of virgin and recycled materials;- Consider the latest proposal for Green Claims Directive.

6934 *Source: own elaboration*

6935

6936 **10.7.3 Comparison among Ecolabels**

6937 **Table 107.** Textile fibres - comparison among Ecolabels

Topic	Requirement/Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾	
Organic cotton	Requirement	Minimum quantity of organic cotton used to manufacture the final product to be labelled: 95%	Minimum quantity of organic cotton used to manufacture the final product to be labelled: 100%	Must be sourced from controlled organic cultivation or fibres from the conversion phase and comply with requirements of regulations and certificates.	
		N.A		At all stages of the processing chain, it must be ensured that controlled biological fibres and products are not mixed with conventional fibres and products and controlled biological fibres are not contaminated due to contact with prohibited substances.	
	Verification	Common regulation to certify organic cotton: American National Organic Programme (NOP)			
		Council Regulation (EC) No 834/2007	Regulation (EU) 2018/848		
		Traceability of organic cotton	N.A	Implied in the requirement text	
	Certification annually for each country or origin: Regulation (EC) No 834/2007; The US National Organic Programme (NOP), Set by other trade partners. Cotton volume or blend requirements require records, invoices, and documentation from the spinning or fabric production stages.	Fulfilling requirements, emphasising the cultivation of organic cotton in line with the standards. Transaction certificates for suppliers with Global Organic Textile Standard certification are needed.	Compliance verification of requirements. Fibres labelled with the German organic logo (Bio-Siegel), the EU organic logo ("Euro leaf"), or the American National Organic Program (NOP), IFOAM or DIN EN ISO/IEC 17065. For products in the conversion phase, certification of Fibre production is required, and in the case of RAL GmbH, a shipping or transaction certificate is necessary if relevant.		
Other cotton production	Requirement	Minimum content of 20% of cotton grown according to IPM principles, and 60% is the minimum content of cotton grown according to IPM principles for the following products: T-shirts, woman's tops, casual shirts, jeans, pyjamas, and nightwear, underwear, and socks.	Only applicable to clothing (uniforms and workwear) and bed linen, towels, bathrobes, tablecloths, tea towels, cloths, and napkins for, e.g., hotels, hospitals, and other institutions. Cotton cultivated according to different IPM standards (BCI, CmiA, and FairTrade cotton) and not GMO (genetically modified organisms according to EU Directive 2001/18)	Applicable to: the fibres used in the products must not be sourced from genetically modified organisms (GMO). In the case of fine yarns (fineness range > NM100), where the required fibre lengths cannot currently be sourced from the controlled organic cultivation of cotton	

²¹⁰ EU Ecolabel criteria for textile products. Commission Decision of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products. Commission Decision (2014/350/EU). Available at [this link](#).

²¹¹ Nordic Swan Ecolabel criteria for textiles, hides/skins, and leather. Version 5.6, 01 March 2022 – 31 December 2026. Available at [this link](#). Last accessed on 27 November 2024.

²¹² Blue Angel – The German Ecolabel: DE-UZ 154 Basic Award Criteria for textiles. Edition January 2023, version 2. Available at [this link](#). Last accessed on 12 January 2024

Topic	Requirement/Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
		Traceability requirements.		
		List of forbidden pesticides for conventional cotton production	N.A	N.A
		N.A	N.A	At all stages of the processing chain, it must be ensured that controlled biological fibres and products are not mixed with conventional fibres and products and controlled biological fibres are not contaminated due to contact with prohibited substances.
	Verification	<ul style="list-style-type: none"> •Need for proper documentation or certification to demonstrate compliance with standards concerning cotton production. •Certified Integrated Pest Management (IPM) schemes during the cotton cultivation process: BCI, CmiA, and Fair Trade cotton. •Emphasis on the absence of genetically modified cotton and the traceability of the supply chain. 		The German Environment Agency can inspect to decide whether the cotton used in the product has been certified by a different certification system (e.g., Cotton Made in Africa (CmiA) and Fairtrade Cotton) can also be approved.
		Pesticide restrictions. Necessity for testing or declarations of non-use from farmers or producer groups. Comprehensive testing methodologies for pesticides such as US EPA 8081 B, 8151 A, 8141 B, and 8270 D for different types of pesticides.	N.A	N.A
Recycled cotton (fibres or materials)	Requirement	Same as the general recycling requirement	Pre-consumer or post-consumer raw materials, according to ISP 14021 standard Mechanically and chemically recycled fibres are included	The same requirements as the recycled Fibres
	Verification	Same as the general recycling requirement	Global Recycled Standard certificate 4.0 (or later versions), Recycled Claim Standards (RCS) or other certification approved by Nordic Swan Ecolabelling, AND/OR Documentation indicating the fibre was purchased 100% recycled and indicates the supplier	The same requirements as the recycled Fibres

Topic	Requirement/Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾	
Flax, linen and other bast fibres	Requirement	N.A	N.A.	Must be sourced from controlled organic cultivation or fibres from the conversion phase and comply with requirements of regulations and certificates. At all stages of the processing chain, it must be ensured that controlled biological fibres and products are not mixed with conventional fibres and products and controlled biological fibres are not contaminated due to contact with prohibited substances.	
		Retted under ambient conditions and without thermal energy inputs.	Retting only allowed if the wastewater from the retting ponds is treated to reduce the COD or TOC	If the Fibres are produced using water retting, the water has to be treated to reduce the chemical oxygen demand (COD) or the total organic carbon	
		Percentage by which COD or TOC in wastewater from retting should be reduced (at least 75% for hemp and at least 95% for flax and other bast Fibres)			
		N.A	Only cultivated using pesticides permitted according to Regulation (EC) No 1107/2009	N.A	
		N.A	N.A	The fibres used in the products must not be sourced from genetically modified organisms (GMOs).	
	Verification	For water retting: Test report showing compliance and using the test method: ISO 6060 (COD) Declaration of the retting method used by the farmers and/or other suppliers.	For water retting: Test method for measuring COD and TOC: ISO 6060. Test report from the producer or Proof of a valid EU Ecolabel licence in line with the Commission Decision of July 2014.	For water retting: Test of the COD will be carried out in accordance with ISO 6060 or DIN 38409-41 or DIN 38409-44 or DIN-ISO 15705.	
		N.A	For pesticides: Valid certificate from European Flax Standard or equivalent.	Compliance verification Compliance with requirements: Fibres labelled with German organic logo (Bio-Siegel) or Euorganic logo ("Euro leaf") or American National Organic Programme (NOP),-IFOAM or DIN EN ISO/IEC 17065. For products "in conversion" only if fibre production can be certificated. In the case of RAL GmbH --> a shipping or transaction certificate (if relevant), Regulation (EC) No 834/2007 2018/848 (EC Organic Regulation) Declaration of compliance with requirements and verification submission for using residues from the agricultural, timber and food industries.	
Wool and	Requirement	The same restrictions on a group of ectoparasiticides with a maximum of 0.5 ppm or a maximum of 2 ppm. The requirement does not apply if specific documentary evidence is presented, together with an independent verification of specific details.		N.A	

Topic	Requirement/Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
other keratin fibres		Derogation for Wool scourers operating closed-loop water systems that break down the ectoparasiticides above must comply with at least two treatments indicated in EU Ecolabel.	N.A	N.A
		COD values restrictions for wool scouring operations. Limits (same as the Nordic Swan) •45 g/kg for fine wool •25 g/kg for coarse wool	COD emissions from wool scouring plants. Limits (same as the EU Ecolabel) • 45 g/kg for fine wool • 25 g/kg for coarse wool Wastewater sent to local/regional treatment works is exempted. Measurement of PCOD, TOC or BOD may also be used if a correlation to COD is evident.	Requirements for wastewater from wool scouring before mixing (indirect discharge) The COD limit is 45 g/kg of greasy wool before mixing with other wastewater (it does not apply to recycled fibres) Requirements for wastewater from wool scouring at the discharge point (direct discharge) The COD limit is 150 mg/l (qualified random sample) or 1.5 mg/l (2-hour mixed sample) of greasy wool.
		N.A	pH value and temperature of wastewater from wool scouring The pH value of the wastewater released to the surface water must be 6-9 (same as Blue Angel), and the temperature must be lower than 40°C (higher temperature than Blue Angel's requirement)	pH value of the wastewater discharged to surface waters must be between 6 and 9 (same as the Nordic Swan) (unless the pH value of the receiving waters is outside this range), and the temperature must be below 35°C (lower temperature than Nordic Swan's requirement) (unless the temperature of the receiving waters is already above this limit). The requirement does not apply to recycled fibres.
		Scouring: Measures to recover value from either oxidised grease, fibre, suint or sludge arising from the scouring site used for the ecolabelled wool products •Recovery for sale as a chemical feedstock; •Production of compost or liquid fertiliser; •Manufacturing of products such as building materials; •Treatment and energy recovery by anaerobic digestion or incineration	Scouring agents Must be either readily aerobically biodegradable or inherently aerobically biodegradable by test method: OECD 301 A-F (60% degradability), OECD 310 (60% degradability), OECD 302 A-C (70% degradability) or equivalent.	Scouring: Exclusion of washing agents containing alkylphenol ethoxylates Washing agents containing alkylphenol ethoxylates (APEO) are prohibited. Direct and indirect discharge limits may not exceed 5µg/l APEO (NPEO, OPEO, NP, and OP).
Verification		Ectoparasiticides: Provide the documentation or the following test methods: IWTO draft test method 59 (same as the Nordic Swan). In case of derogation, applicants must provide evidence confirming the scouring plant configuration and laboratory test reports.	Ectoparasiticides: Tests must be performed in accordance with IWTO Draft Test Method 59 (same as EU Ecolabel). Verify through the wool supplier's declaration that no mulesing has been used. Test report showing that the pesticide requirement has been fulfilled.	N.A
		COD same test for all: Test method ISO 6060 and the following compliance/verification methods		

Topic	Requirement/Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
		<p>COD: Compliance with this criterion shall be based on monthly averages for the six months preceding the application.</p> <p>Scouring: Provide a report and waste transfer notes confirming the type and proportion of waste recovered and the method used.</p>	<p>COD: Test report or a valid GOTS or EU Ecolabel certificate</p> <p>Scouring: Declaration from the chemical supplier and safety data sheet for the scouring agents used and/or OECD or ISO test results showing compliance with the requirement.</p>	<p>COD: Declaration of compliance with the requirements and confirmation from the operator of the wool scouring plant+ method treatment Test of the COD: DIN 38409-41 or, DIN 38409-44 or DIN-ISO 15705. If discharged to an urban wastewater treatment plant, the applicant shall also enclose a notice of approval verifying compliance with Directive (EEC) 91/271.</p> <p>Scouring: declaration of conformity - Annex 57 of the German Wastewater Ordinance or equivalent international test reports. The following test methods can be used here (based on a qualified random sample or a 2-hour mixed sample): NPEO, OPEO, NP, and OP: ISO 18857-1, ISO 18857-2, ISO 18254-1 or ASTM D7742-17.</p>
Organic wool	Requirement	N.A	Certified organic wool: wool fibre certified as organic according to a standard approved in the IFOAM.	<p>Wool, alpaca and cashmere must be sourced from controlled organic cultivation, controlled biological animal husbandry, or fibres from the conversion phase (transition from non-organic to organic farming) and comply with the requirements indicated in "verification".</p> <p>At all stages of the processing chain, it must be ensured that controlled biological fibres and products are not mixed with conventional fibres and products and controlled biological fibres are not contaminated due to contact with prohibited substances.</p>
	Verification	N.A	<p>Certification required: standards approved in the IFOAM, such as Regulation (EU) 2018/848, ISO 17065), USDA National Organic Program (NOP) (same as Blue Angel)</p> <p>APEDA's National Programme for Organic Production (NPOP), China Organic Standard GB/T19630, GOTS certification. Also approved are GOTS and DEMETER and certification as "transitioning to organic cultivation". The certification body must have the accreditation required for the standard, such as IFOAM (same as Blue Angel).</p>	<p>The applicant shall declare compliance with the requirement.</p> <p>Fibres labels accepted: German organic logo (Bio-Siegel), the EU organic logo ("Euro leaf")</p> <p>In the case of alpaca, certification according to the Responsible Alpaca Standard 1.0 © 2021 Textile Exchange.</p> <p>The certification of products "in conversion" is possible.</p>

Topic	Requirement/Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
				In the case of cashmere, certification according to the Good Cashmere Standard® (GCS) by AbTF can be submitted as an alternative to certification of controlled biological animal husbandry.
Recycled wool	Requirement	Same as the general recycling requirement.	Recycled wool: As per the definition in the ISO 14021 standard. Both mechanically and chemically recycled fibres are included.	Same as the requirements for the recycled fibres.
	Verification	Same as the general recycling requirement.	Fulfilment with either a) or b): a) Global Recycled Standard certificate 4.0, Recycled Claim Standard certificate, or equivalent certification. b) Present documentation demonstrating that the recycled fibre was purchased as recycled and state the supplier.	Same as the requirements for the recycled fibres.
Acrylic	Requirement	The emissions to air of acrylonitrile (during polymerisation and up to the solution ready for spinning) shall be less than 1g/kg of fibre produced (same limit as Blue Angel) as an annual average.	<i>If bio-based origin:</i> Must contain at least 90% bio-based raw material. Palm oil, soybean oil, and soy flour must not be used. They must meet either a) or b): a) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001. b) If sugar cane is used, it must be certified to Bonsucro standard, version 5.1 or later version or certified to a standard that meets the requirements. The producer must have a CoC certification according to the standard by which the raw material is certified. Traceability must at least be ensured by mass balance. Book and claim systems are not accepted. The producer of the bio-based polymer must document its purchase of certified raw materials for polymer production. The raw materials must meet either c) or d): c) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001. d) Primary raw materials not genetically modified.	The emissions to air of acrylonitrile (during polymerisation and up to the solution ready for spinning), expressed as an annual average, must be less than 1 g/kg of fibre produced (same limit as EU Ecolabel) (this requirement does not apply to recycled fibres unless the recycling process breaks down the materials to the monomer level. If this is the case, this requirement also applies to recycled fibres) The residual acrylonitrile content in raw fibres leaving the fibre production plant must be less than 1.5 mg/kg (this requirement does not apply to recycled fibres unless the recycling process breaks down the materials to the monomer level. If this is the case, this requirement also applies to recycled fibres)
		The workplace emissions to air of N, N-dimethylacetamide (127-19-5) during polymerisation and spinning shall not exceed an Indicative Occupational Exposure Limit Value of 10.0 ppm.	<i>If fossil origin:</i>	N.A

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
			100% recycled material. This must not include recycled plastic from EFSA plants or FDA-approved food contact material or be marketed as compatible with these.	
Verification		<p>Acrylonitrile: Detailed documentation and/or test reports showing compliance with this criterion and a Declaration of Compliance from the fibre manufacturer.</p>	<p><i>If bio-based origin:</i></p> <ul style="list-style-type: none"> - Test according to ISO 16620, ASTM D6866, or equivalent standards showing the content of bio-based raw material. - Declaration by the producer that palm oil, soybean oil and soy flour are not used. - For waste and residual products: Documentation that shows the requirement's definition of waste or residual products and traceability is met. - Sugar cane: Certification system sugar cane is certified for. CoC certificate or a certificate number. Documentation from the producer of the bio-based polymer showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer. Declaration stating that it has not been genetically modified. - For primary raw materials: Declaration stating that they have not been genetically modified. Name and geographical origin of the primary raw materials used. 	<p>Acrylonitrile Compliance with the requirement and submission of confirmation from the suppliers of the fibres, as well as a test (according to specified methods) report from the suppliers of the fibres verifying compliance with this requirement.</p>
		<p>N, N-dimethylacetamide: Emissions values measured at those process stages in which the substances are used, expressed as an 8-hour average value. Test reports and monitoring data from the fibre manufacturer showing compliance with this criterion.</p>	<p><i>If fossil origin:</i></p> <ul style="list-style-type: none"> - Declaration from the producer of the recycled raw material that it is not EFSA or FDA-approved. - Certificate from an independent certifier of the supply chain. - Documentation from the producer showing that the raw material is 100% recycled. 	N.A

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
Elastane	Requirement	<p>Bans organotin compounds.</p> <p>Limits exposure to 3 specific aromatic diisocyanates:</p> <ul style="list-style-type: none"> (i) diphenylmethane-4,4'-diisocyanate (101-68-8) 0.005 ppm (ii) toluene-2,4-diisocyanate (584-84-9) 0.005 ppm (iii) N, N-dimethylacetamide (127-19-5) 10.0 ppm 	<p><i>If bio-based origin:</i></p> <p>Must contain at least 90% bio-based raw material. Palm oil, soybean oil, and soy flour must not be used. They must meet either a) or b):</p> <ul style="list-style-type: none"> a) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001. b) If sugar cane is used, it must be certified to Bonsucro standard, version 5.1 or later version or certified to a standard that meets the requirements. <p>The producer must have a CoC certification according to the standard by which the raw material is certified. Traceability must at least be ensured by mass balance. Book and claim systems are not accepted. The producer of the bio-based polymer must document its purchase of certified raw materials for polymer production. The raw materials must meet either c) or d)</p> <ul style="list-style-type: none"> c) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001. d) Primary raw materials not genetically modified. <p><i>If fossil origin:</i></p> <p>100% recycled material. This must not include recycled plastic from EFSA plants or FDA-approved food contact material or be marketed as compatible with these. Synthetic fibre of fossil origin 100% recycled material in line with ISO 14021, EXCEPTION:</p> <ul style="list-style-type: none"> • For elastane fibres that are STANDARD 100 by OEKO-TEX certified 	<p>Bans organotin compounds.</p> <p>Limits exposure to aromatic diisocyanates a 0.05 mg/m³ value expressed as an 8-hour average. It applies to recycled fibres, only if the recycling process breaks down the materials to the monomer level.</p>

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
	Verification	Declaration of non-use from the Fibre manufacturer and measurement of emissions values, provided as an 8-hour average value. Test reports and monitoring data from the fibre manufacturer(s) demonstrating compliance are necessary.	<p><i>If bio-based origin:</i></p> <ul style="list-style-type: none"> - Test according to ISO 16620, ASTM D6866 or equivalent standards showing the content of bio-based raw material. - Declaration by the producer that palm oil, soybean oil and soy flour are not used. - For waste and residual products: Documentation which shows that the requirement's definition of waste or residual products is met, as well as traceability. - Sugar cane: Certification system sugar cane is certified for. CoC certificate or a certificate number. Documentation from the producer of the bio-based polymer showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer. Declaration stating that it has not been genetically modified. - For primary raw materials: Declaration stating that they have not been genetically modified. Name and geographical origin of the primary raw materials used. <p><i>If fossil origin:</i></p> <ul style="list-style-type: none"> - Declaration from the producer of the recycled raw material that it is not EFSA or FDA-approved. - Certificate from an independent certifier of the supply chain. - Documentation from the producer showing that the raw material is 100% recycled. 	Declaration of the non-use of specific compounds and submit confirmation from the fibre suppliers, with the option to use suitable HPLC test methods recognised testing laboratories.

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
Polyester	Requirement	<p>a) The level of antimony present in the polyester fibres shall not exceed 260 ppm (same limit as Blue Angel). Polyester fibres manufactured from recycled PET bottles are derogated (same requirement as Blue Angel).</p> <p>b) Staple fibres shall contain a minimum content of 50 % and filament fibres 20 % of recycled PET (same requirement as Blue Angel). Micro-fibres are derogated from this requirement and shall comply with (c).</p> <p>c) Emissions of VOCs during the production of polyester limit 1.2 g/kg for PET chips (same limit as Blue Angel) and 10.3 g/kg for filament fibre (same limit as Blue Angel).</p>	<p><i>If bio-based origin:</i> Must contain at least 90% bio-based raw material. Palm oil, soybean oil, and soy flour must not be used. They must meet either a) or b): a) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001. b) If sugar cane is used, it must be certified to Bonsucro standard, version 5.1 or later version, or certified to a standard that meets the requirements. The producer must have a CoC certification according to the standard by which the raw material is certified. Traceability must at least be ensured by mass balance. Book and claim systems are not accepted. The producer of the bio-based polymer must document its purchase of certified raw materials for polymer production. The raw materials must meet either c) or d): c) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001. d) Primary raw materials not genetically modified.</p> <p><i>If fossil origin:</i> 100% recycled material. This must not include recycled plastic from EFSA plants or FDA-approved food contact material or be marketed as compatible with these. Synthetic fibre of fossil origin 100% recycled material in line with ISO 14021, EXCEPTION: • For white polyester (200-220 GG, Tint 0-3 or equivalent according to the CIE Whiteness Index) for professional textiles, an exception is given until June 30th, 2024. When using the exception, it is required that the fibres be STANDARD 100 by OEKO-TEX certified.</p>	<p>a) Limit the amount of antimony present in the polyester fibres 260 ppm (same limit as EUEL) or an elutable amount of 30 mg/kg. This requirement also applies to recycled fibres.</p> <p>b) The use of PET beverage packaging in the production of recycled fibres is permitted for a transitional period of two years (after this period, PET from beverage packaging is not permitted). Staple fibres shall contain a minimum content of 50 % and filament fibres 20 % of recycled PET (same requirement as EUEL)</p> <p>c) VOC emissions must not exceed 1.2 g/kg for PET chips (same limit as EUEL), 10.3 g/kg for filament fibres (same limit as EUEL) or 0.2 g/kg for produced polyester resin. This requirement does not apply to recycled polyester fibres unless the recycling process breaks down the materials to the monomer level. If this is the case, this requirement also applies to recycled polyester fibres.</p>

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
	Verification	<p>a) Declaration of non-use or a test report using the test methods indicated in the criterion. A declaration shall be provided for fibres manufactured from recycled PET bottles.</p> <p>b) Recycled content shall be traceable back to the reprocessing of the feedstock.</p> <p>c) The applicant shall provide monitoring data and/or test reports demonstrating compliance with EN 12619 (same standard as Blue Angel) or standards with an equivalent test method.</p>	<p><i>If bio-based origin:</i></p> <ul style="list-style-type: none"> - Test according to ISO 16620, ASTM D6866, or equivalent standards showing the content of bio-based raw material. - Declaration by the producer that palm oil, soybean oil and soy flour are not used. - For waste and residual products: Documentation that shows the requirement's definition of waste or residual products and traceability is met. - Sugar cane: Certification system sugar cane is certified for. CoC certificate or a certificate number. Documentation from the producer of the bio-based polymer showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer. Declaration stating that it has not been genetically modified. - For primary raw materials: Declaration stating that they have not been genetically modified. Name and geographical origin of the primary raw materials used. <p><i>If fossil origin:</i></p> <ul style="list-style-type: none"> - Declaration from the producer of the recycled raw material that it is not EFSA or FDA-approved. - Certificate from an independent certifier of the supply chain. - Documentation from the producer showing that the raw material is 100% recycled. 	<p>a) Declaration of antimony-free polyester fibres and the corresponding declaration or a test report from the fibre suppliers to verify compliance. Leaching according to DIN EN ISO 105-E04 / determined according to ISO 17294-2 (ICP/MS). The recycling process must be described if recycled fibres are used</p> <p>a) and c) a Declaration of compliance with the requirement and submission of a declaration of conformity from the fibre suppliers, as well as a test report by DIN EN 12619 (same standard as EU Ecolabel). The recycling process must be described if recycled fibres are used.</p>

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
Polyp ropyl ene	Require ment	Bans the use of lead based pigments.	<p><i>If bio-based origin:</i> Must contain at least 90% bio-based raw material. Palm oil, soybean oil, and soy flour must not be used. They must meet either a) or b): a) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001. b) If sugar cane is used, it must be certified to Bonsucro standard, version 5.1 or later version or certified to a standard that meets the requirements. The producer must have a CoC certification according to the standard by which the raw material is certified. Traceability must at least be ensured by mass balance. Book and claim systems are not accepted. The producer of the bio-based polymer must document its purchase of certified raw materials for polymer production. The raw materials must meet either c) or d): c) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001. d) Primary raw materials not genetically modified.</p> <p><i>If fossil origin:</i> 100% recycled material. This must not include recycled plastic from EFSA plants, FDA-approved as food contact material, or marketed as compatible with these. Synthetic fibre of fossil origin 100% recycled material in line with ISO 14021,</p>	Bans the use of lead based pigments.

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
	Verification	Declaration of non-use.	<p><i>If bio-based origin:</i></p> <ul style="list-style-type: none"> - Test according to ISO 16620, ASTM D6866, or equivalent standards showing the content of bio-based raw material. - Declaration by the producer that palm oil, soybean oil and soy flour are not used. - For waste and residual products: Documentation that shows the requirement's definition of waste or residual products and traceability is met. - Sugar cane: Certification system sugar cane is certified for. CoC certificate or a certificate number. Documentation from the producer of the bio-based polymer showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer. Declaration stating that it has not been genetically modified. - For primary raw materials: Declaration stating that they have not been genetically modified. Name and geographical origin of the primary raw materials used. <p><i>If fossil origin:</i></p> <ul style="list-style-type: none"> - Declaration from the producer of the recycled raw material that it is not EFSA or FDA-approved. - Certificate from an independent certifier of the supply chain. - Documentation from the producer showing that the raw material is 100% recycled. 	Declaration of non-use and confirmation from the fibre suppliers. The recycling process must be described if recycled fibres are used.
Man-made cellulose fibres	Requirement	<p>Sustainable Forestry Management: A minimum of 25% of pulp Fibres must be manufactured from wood grown according to sustainable forestry management principles. The remaining proportion of pulp Fibres should be from legal forestry and plantations.</p> <p>Pulp from Cotton Linters: Pulp produced from cotton linters must meet the requirements of either cotton criterion 1a or 1b.</p> <p>Bleaching Process: Requirement (9c): The pulp used for fibre manufacturing must be bleached without elemental chlorine. Total chlorine and organically bound chlorine (OX) in finished Fibres must not exceed 150</p>	<p><i>If bio-based origin:</i></p> <p>Must contain at least 90% bio-based raw material. Palm oil, soybean oil, and soy flour must not be used. They must meet either a) or b):</p> <p>a) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001.</p> <p>b) If sugar cane is used, it must be certified to Bonsucro standard, version 5.1 or later version or certified to a standard that meets the requirements.</p> <p>The producer must have a CoC certification according to the standard by which the raw material is certified. Traceability must at least be ensured by mass balance. Book and claim systems are not accepted.</p> <p>The producer of the bio-based polymer must document its purchase of certified raw materials for polymer production.</p>	N.A

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
		<p>ppm. AOX in wastewater from pulp manufacturing must not exceed 0.170 kg/ADt pulp.</p> <p>Value Recovery from Spent Process Liquors: Requirement (9d): A minimum of 50% of the pulp used for Fibre manufacturing must be purchased from dissolving pulp mills that recover value from spent process liquors through on-site electricity and steam generation or manufacturing chemical co-products.</p> <p>Sulphur Content in Emissions (for Viscose and Modal Fibres): Requirement (9e): The sulphur content of emissions of sulphur compounds to air from Fibre production processes must not exceed specified performance values.</p>	<p>The raw materials must meet either c) or d):</p> <p>c) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001.</p> <p>d) Primary raw materials not genetically modified.</p>	
	Verification	<p>Sustainable Forestry Management: The applicant needs to obtain valid, independently certified chain of custody certificates from the Fibre manufacturer(s) demonstrating compliance with sustainable forestry management principles. Certifications from FSC, PEFC, or equivalent schemes are accepted.</p> <p>Pulp from Cotton Linters: Cotton must be certified by an independent control body, complying with regulations and standards. Non-genetically modified varieties of cotton should be verified according to specified regulations.</p> <p>Bleaching Process: The applicant needs to provide a test report showing compliance with OX or AOX requirements using the appropriate test methods (OX: ISO 11480, AOX: ISO 9562).</p> <p>Value Recovery from Spent Process Liquors: The applicant must provide a list of pulp suppliers, documentation, and evidence of energy generation and co-product recovery systems.</p>	<p>If bio-based origin:</p> <ul style="list-style-type: none"> - Test according to ISO 16620, ASTM D6866, or equivalent standards showing the content of bio-based raw material. - Declaration by the producer that palm oil, soybean oil and soy flour are not used. - For waste and residual products: Documentation that shows the requirement's definition of waste or residual products and traceability is met. - Sugar cane: Certification system sugar cane is certified for. CoC certificate or a certificate number. Documentation from the producer of the bio-based polymer showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer. Declaration stating that it has not been genetically modified. - For primary raw materials: Declaration stating that they have not been genetically modified. Name and geographical origin of the primary raw materials used. 	N.A

Topic	Requirement/Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
		Sulphur Content in Emissions (for Viscose and Modal Fibres): The applicant needs to provide detailed documentation and/or test reports showing compliance with this criterion, along with a declaration of compliance		
Regenerated Cellulose fibres	Requirement	N.A	Recycled Content: Recycled raw materials for producing new regenerated cellulose fibres must be pre-consumer or post-consumer* cellulosic material. It must be documented that 100% is recycled material.	Recycled Content: Allows the use of recycled materials.
			Chain of Custody Certification: Chain of Custody certification (FSC or PEFC). Manufacturers using only recycled material are exempt from the Chain of Custody requirement	Chain of Custody Certification: Requires certain certifications for cellulose origin.
			Bleaching Restrictions: Prohibits the use of chlorine gas in bleaching.	Bleaching Restrictions: Restricts the use of elementary chlorine. Additional Bleaching Process Restrictions Place restrictions on using hypochlorite and set limits on chlorine dioxide consumption and AOX emissions to wastewater during bleaching.
			Emission Limits: Imposes emission limits for specific substances in the production process.	Emission Limits: Sets limits on emissions to wastewater and air, including COD, nitrogen, phosphorus, sulphur compounds, and dust.
			Tree Species Limitation: Restrictions on using virgin wood Fibres from specific tree species.	N.A
			Origin: Requires traceability of regenerated cellulose fibre or recycled textile fibre	Cellulose Origin: Requires cellulose from wood or bamboo cultivated according to sustainable forestry principles. It also allows using recycled materials and residues from the agricultural, timber, and food industries.
			N.A	Emission Limits Specific to Fibre Types: Sets specific emission limits for viscose and modal fibres, including sulphur content in emissions.
			N.A	Energy Consumption Limits: specifies limits on specific electrical and heating energy consumption in cellulose production.
			N.A	Halogen Content: Specifies a maximum halogen content for fibres.
		Traceability: Requires traceability of regenerated cellulose fibre or recycled textile fibre	N.A	

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
	Verification	N.A	Recycled Content: Certificate from either Global Recycled Standard or Recycled Claim Standard	Recycled Content: Certificate from either Global Recycled Standard or Recycled Claim Standard or submission of purchasing and procurement receipts for waste material.
Chain of Custody Certification: Verification with valid FSC/PEFC Chain of Custody certificates.			Chain of Custody Certification: Verification through valid, independently issued certificates from Fibre producers confirming sustainable forestry management for wood or bamboo Fibres.	
Bleaching Restrictions: Declaration from the cellulose mass and regenerated cellulose manufacturers or a valid EU Ecolabel License.			Bleaching Restrictions: Manufacturers to submit test reports and documentation showing adherence to the specified limits	
Emission Limits: Documentation of closed-loop processes and test reports for emission requirements			Emission Limits: compliance declarations, emission values, and test reports for various aspects of production, including emissions to air and water.	
Cellulose Origin: Declaration from the cellulose mass and regenerated cellulose manufacturers or a valid EU Ecolabel License.			Cellulose Origin: For cellulose sourced from bamboo, a transaction certificate must be submitted	
Tree Species Limitation: Documented with a certificate from either the Global Recycled Standard or the Recycled Claim Standard.			N.A	
N.A			Emission Limits Specific to Fibre Types: Compliance with emission limits for specific fibre types	
N.A			Energy Consumption Limits: Manufacturers need to ensure that the specific electrical and heating energy consumption in cellulose production meets the defined limits	
N.A			Halogen Content: Manufacturers must ensure that the halogen content of fibres does not exceed the specified maximum limit.	
Traceability: documented with a certificate from either the Global Recycled Standard or the Recycled Claim Standard.			N.A	

Topic	Requirement/ Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
Polyamide	Requirement	<p>Polyamide products shall comply with at least one of the following:</p> <ul style="list-style-type: none"> - Fibres shall be manufactured using a minimum content of 20 % recycled from pre and/or post-consumer waste. - The emissions to air of N₂O from nylon monomer production, expressed as an annual average, shall not exceed 9.0 g N₂O/kg of caprolactam or adipic acid. 	<p><i>If bio-based origin:</i></p> <p>Must contain at least 90% bio-based raw material. Palm oil, soybean oil, and soy flour must not be used. They must meet either a) or b):</p> <p>a) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001.</p> <p>b) If sugar cane is used, it must be certified to Bonsucro standard, version 5.1 or later version or certified to a standard that meets the requirements.</p> <p>The producer must have a CoC certification according to the standard by which the raw material is certified. Traceability must at least be ensured by mass balance. Book and claim systems are not accepted.</p> <p>The producer of the bio-based polymer must document its purchase of certified raw materials for polymer production. The raw materials must meet either c) or d):</p> <p>c) Waste or residual products defined by (EU) Renewable Energy Directive 2018/2001.</p> <p>d) Primary raw materials not genetically modified.</p> <p><i>If fossil origin:</i></p> <p>100% recycled material. This must not include recycled plastic from EFSA plants or FDA-approved food contact material or be marketed as compatible with these.</p>	<p>Polyamide products shall comply with at least one of the following:</p> <ul style="list-style-type: none"> - Fibres shall be manufactured using a minimum content of 20 % recycled from pre and/or post-consumer waste. - The N₂O emissions to air during the monomer production, expressed as an annual average, must not exceed 9 g/kg of caprolactam or adipic acid. In addition, reduction technologies must be used to produce caprolactam and adipic acid. It must be ensured that the degree of reduction in the N₂O emissions during adipic acid production is at least 95%.

Topic	Requirement/Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
	Verification	<p>Recycled content shall be traceable back to the reprocessing of the feedstock. This shall be verified by independent certification of the chain of custody or by documentation provided by suppliers and processors.</p> <p>The applicant shall provide documentation or test reports showing compliance based on monitoring data and a Declaration of Compliance from the fibre manufacturer and their feedstock providers.</p>	<p><i>If bio-based origin:</i></p> <ul style="list-style-type: none"> - Test according to ISO 16620, ASTM D6866 or equivalent standard showing the content of bio-based raw material. - Declaration by the producer that palm oil, soybean oil and soy flour are not used. - For waste and residual products: Documentation that shows the requirement's definition of waste or residual products and traceability is met. - Sugar cane: Certification system sugar cane is certified for. CoC certificate or a certificate number. Documentation from the producer of the bio-based polymer showing the purchase of bio-based polymer from certified raw material in at least the same annual quantity as is used in the production of the bio-based polymer. Declaration stating that it has not been genetically modified. - For primary raw materials: Declaration stating that they have not been genetically modified. Name and geographical origin of the primary raw materials used. <p><i>If fossil origin:</i></p> <ul style="list-style-type: none"> - Declaration from the producer of the recycled raw material that it is not EFSA or FDA-approved. - Certificate from an independent certifier of the supply chain. - Documentation from the producer showing that the raw material is 100% recycled. 	<p>Declare compliance with the requirement and submit a DoC from the monomer producer and test reports for the raw and clean gas, verifying that a reduction of at least 95% has been achieved.</p>
Recycled textile fibre	Requirement	<p>Recycled content shall meet the requirements of the Criterion 13 Restricted Substance List.</p>	<p>An extensive list of substances and limits indicated Extractable metals, Organic tin compounds, Chlorophenols, Per- and polyfluorinated compounds, Phthalates, Surfactants, wetting agent residues, Dyes,</p>	<p>Provision of information on the recycled content, the type and composition of the recycled fibre, the origins and composition of the materials fed into the recycling process, and a description of the recycling process.</p>
	Verification	<p>Recycled content shall be traceable back to the reprocessing of the feedstock. This shall be verified by independent third party certification of the chain of custody or by documentation provided by feedstock suppliers and reprocessors.</p> <p>Annually</p>	<p>a) an Oeko-Tex standard 100 class I certificate or b) test report showing that the requirement is complied with.</p> <p>And a description of the procedure confirming an annual test.</p>	<p>Declaration from the manufacturer about the recycled content and origins, accompanied by one of the following certificates:</p> <ul style="list-style-type: none"> • RCS (Recycled Claim Standard), • GRS (Global Recycled Standard), • International Sustainability and Carbon Certification (ISCC+), • Roundtable on Sustainable Biomaterials (RSB), • RedCert (only in Europe) <p>• or a comparable certification system whose scope and requirement standards is equivalent to one of the named certification systems. An</p>

Topic	Requirement/Verification	EU Ecolabel ⁽²¹⁰⁾	Nordic Swan ⁽²¹¹⁾	Blue Angel ⁽²¹²⁾
				independent environmental verifier must confirm the equivalence of the certification system.

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6939 **Table 108.** Components and accessories – comparison among Ecolabels

Topic	Requirement/Verification	EU Ecolabel	Nordic Swan	Blue Angel
Fillings	Requirement	Fibre Restrictions: defined fibre restrictions for fillings in alignment with their respective standards		Fibre restrictions: Not explicitly mentioned
		Chemical Substances: emphasis on the chemical substances used in fillings and their laundering processes. The criteria include biocides, formaldehyde emissions, fabric softeners, and other relevant chemicals.	Chemical Substances: restricts chemical substances used in additives and treatments applied to fillings. It does not mention the laundering process.	Chemical Substances: references substance restrictions from the REACH "list of candidates," the CLP Regulation (EC/1272/2008), and limits from the ZDHC MRSL, provided they are stricter than REACH. It does not mention the laundering process.
		Polyurethane and Latex: not specifically address polyurethane and latex fillings.	Polyurethane and Latex: focuses on restrictions related to blowing agents	Polyurethane and Latex: concentration limits and VOC (Volatile Organic Compounds) emissions for polyurethane and latex. The concentration of aromatic diisocyanates and blowing agents are also restricted in PUR.
		Foamed Synthetic Materials: Formaldehyde emissions restrictions resulting from the laundering process.	Foamed Synthetic Materials: Limits on emissions from substances used in foamed synthetic materials, including formaldehyde and others.	Foamed Synthetic Materials: Latex foam and specifies restrictions regarding its concentration and volatile organic compounds (VOC) emissions.
		Polycyclic Aromatic Hydrocarbons (PAHs): Not referenced	Polycyclic Aromatic Hydrocarbons (PAHs): For foamed synthetic materials such as polyurethane, latex, and expanded polystyrene, the content of each PAH stated in the requirement shall be below 0.5 mg/kg.	Polycyclic Aromatic Hydrocarbons (PAHs): Not mentioned

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel	
	Verification	Fibres: follow their fibre verification methods		Fibres: Not explicitly mentioned	
		Emissions from PUR and latex foams: not mentioned	Emissions from PUR and latex foams: same standard for verification, but different verification methods.		
		Polyurethane: not mentioned	Polyurethane: Declaration of Conformity (DoC) regarding blowing agents	Polyurethane: Declaration of Conformity (DoC) and test reports on limit values for additives and emissions (CFCs and VOCs).	
		PAHs: not mentioned	PAHs: tested by ISO 18287 or ZEK 01.2-08 (GC/MS)	PAHs: not mentioned	
Feathers and downs	Requirement	N.A	Ethical requirements: prohibit using feathers and down plucked from live birds or forced feeding birds		
			Includes recycled down and feather	N.A	
			Microbial cleanliness: must document microbial purity and comply with the oxygen index number of max. 10 and fat content	Microbial cleanliness: requirements for down and feathers regarding oxygen index, microbiological state, mesophil aerobic bacteria count, faecal streptococci count, sulphite reducing clostridium count, presence of salmonella, oil and grease content, turbidity, pH	
			Labelling: requires labelling feathers and down-filling materials; Blue Angel Ecolabel does not mention it.	Labelling: Does not mention it.	
			Wastewater: The given text does not provide specific wastewater discharge standards.	Wastewater: detailed wastewater discharge standards, including limits for various parameters and pH and temperature requirements.	
	Verification	N.A	Adherence to the Down Standard or an equivalent.		Submission of audit reports from testing institutions.
			For recycled materials, either a Recycled Global Standard certificate or supplier documentation is required.		N.A
			N.A	For wastewater: compliance with the requirements. A declaration of conformity from the processing plant operator and test reports.	

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel	
Coating, laminates and membranes	Requirement	Focuses on specific criteria for polyurethane and polyester, including workplace emissions, antimony content, and VOC emissions. Addresses restrictions on phthalates in polymers. Allows the use of fluoropolymer membranes and laminates but with restrictions on PFOA. Does not mention adhesives.	It covers requirements for textiles used as substrates, including materials for coatings, laminates, and membranes. Specifies criteria for recycled and biobased raw materials, including palm oil, soybean oil, and soy flour restrictions. Specifically, if a polymer constitutes more than 5% by weight of the finished fabric, it must be either 100% recycled or composed of at least 90% bio-based raw material. Prohibits halogenated polymers and sets requirements for additives (CLP Regulation 1272/2008) in polymers. Lists various prohibited substances and materials, such as siloxanes, flame retardants, PFCs, and heavy metals. Covers adhesives used in the laminating process.	Focuses on requirements for laminates and membranes used in products. Addresses textile and membrane materials. Requires compliance with recycled materials (at least 30%) or avoiding organic solvents for polyurethane membranes. Allows only specific types of adhesives (thermoplastic or reactive hot melt) and prohibits solvent-based adhesives. Using reactive polyurethane-based hot melt adhesives sets limits for aromatic diisocyanates in workplaces. Includes criteria for functional products, with exclusion criteria for certain substances and materials, such as biocides, flame retardants, PFCs, and VOCs.	
	Verification	For polyester components, compliance involves meeting standard fibre criteria. There are specific requirements related to antimony content and VOC emissions.	Verification procedures align with specified fibre criteria. A Declaration of Conformity confirms the absence of blowing agents for polyurethane components.	Verifies textiles against fibre criteria. They have specific requirements related to recycled materials and antimony content. Verification relies on the Declaration of Conformity (DoC) process.	
Accessories	Requirement	N.A	Zippers, buttons, and non-textile accessories are limited if they do not have a practical purpose.	N.A	
		Concentration of metals: Nickel migration 0.5 µg/cm ² /week Lead 90 mg/kg Cadmium -> Intended for children under 3 y -> 50 mg/kg Others 100 mg/kg Chrome 60 mg/kg Mercury 60 mg/kg	Concentration of metals: Lead (Pb): 90 mg/kg. Cadmium (Cd): 40 mg/kg Nickel (Ni): migration limit must be less than 0.5 micrograms/cm ² /week	Concentration of metals: Lead 90mg/kg; Cadmium: 50 mg/kg; Chromium: 60 mg/kg. Nickel: migration value for metal alloys is 0.5 ug/cm ² /week.	
		Plastic accessories cannot have phthalates			
		N.A	Restrictions on chlorinated plastics	N.A	

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
	Verification	Nickel test migration and testing for other metals.		
		Phthalate Testing	Declaration from the manufacturer of the plastic material that the plastic meets the requirement.	Phthalate Testing
		N.A	Declaration from the Licensee that no details or accessories are used without a practical function.	N.A

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6941 **Table 109.** Fitness for use - comparison among Ecolabels

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
Dimensional changes during washing and drying	Requirement	<p>This does not apply to fibres or yarn labelled "dry clean only." or equivalent, and furniture fabrics that are not removable and washable.</p> <p>Knitted products +-4.0% Chunky knit +-6% Interlock +-5% Woven fabrics: cotton, cotton mix +-3%, wool mix and synthetic fibres +-2% Socks and hosiery, bathroom linen +-8%</p> <p>Washable and removable woven upholstery +-2% Woven Mattress ticking +-3% Non-woven mattress ticking +5% All other non-woven fabric +6%</p>	<p>Not apply to fibres or yarn, products labelled "dry clean only", and upholstery fabrics not removable and washable.</p> <p>Knitted products and hosiery +-5.0% 100% Wool knitwear +-10% Curtains and upholstery cover removable and washable +-2% Woven fabrics for duvets and pillows +-5% Woven textiles of wool blend and synthetic fibres +-2% Woven textiles not covered by the categories above +-3% Bedding, tablecloths and napkins +-5% Terry towels and washcloths +-7%</p>	<p>Not apply to fibres or yarn, products labelled "dry clean only", not removable and washable furniture fabrics.</p> <p>Knitted products +-5.0% Chunky knit +-6% House and home textiles +-8% Woven fabrics: cotton, cotton mix, linen, flax and silk +-3%, cotton and cotton mix for bedding and wool mix +-5%, and synthetic fibres +-2% Socks and hosiery +-5% Bathroom linen, including terry towelling and fine rib fabrics +-8% Regenerated and synthetic woven fabrics +-3% Regenerated and synthetic knitted fabrics +-5%</p>
	Verification	<p>For domestic washing, EN ISO 6330 combined with EN ISO 5077. For commercial washings, ISO 15797 combined with EN ISO 5077.</p>	<p>For domestic washing, EN ISO 6330 combined with EN ISO 5077. For commercial washings, ISO 15797 combined with EN ISO 5077. Woven products for duvets and pillows with feathers and down filling tested with EN 13186</p>	<p>DIN EN ISO 6330 combined with EN ISO 5077.</p>

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
Tear Strength	Requirement	N.A	Trousers, shorts, skirts 1.5daN Jackets and coats 1.2daN Sportswear, ski clothing, and other outdoor wear 1.2daN Lingerie, pyjamas, and other nightwear 0.8daN T-shirts, blouses, shirts, and dresses 0.8daN Swimwear 1.0 daN Bed linen and sheets 0.8daN Towels 0.8daN	N.A
	Verification	N.A	ISO 13937	N.A
Tensile Strength	Requirement	N.A	Trousers, shorts, skirts 18daN Jackets and coats 15daN Sportswear, ski clothing, and other outdoor wear 18daN Lingerie, pyjamas, and other nightwear 12daN T-shirts, blouses, shirts, and dresses 12daN Swimwear 15 daN Bed linen and sheets 12daN Towels 12daN	N.A
	Verification	N.A	ISO 13934-2	N.A
Seam Strength	Requirement	N.A	Woven fabrics The seam in the lining 80N Textile with fabric weight <220g/m2 150N Textile with fabric weight >220g/m2 200N Backpacks and bags 200N	N.A
	Verification	N.A	ISO 13935-2	N.A

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
Seam Slippage resistance	Requirement	N.A	<p><i>If testing with EN-ISO 13936-1</i> Trousers, shorts, skirts 4mm at 14 daN load Jackets and coats 4mm at 14 daN load Sportswear, ski clothing, and other outdoor wear 4mm at 14 daN load Lingerie, pyjamas, and other nightwear 4mm at 10 daN load T-shirts, blouses, shirts, and dresses 4mm at 11 daN load Swimwear 4mm at 14 daN load Bed linen and sheets 4mm at 10 daN load</p> <p><i>If testing with EN-ISO 13936-2</i> Trousers, shorts, skirts 12 daN load at 3mm Jackets and coats 12 daN load at 4mm Sportswear, ski clothing, and other outdoor wear 12 daN load at 4mm Lingerie, pyjamas, and other nightwear 6 daN load at 3mm T-shirts, blouses, shirts, and dresses 6 daN load Swimwear 4mm at 14 daN load at 3mm Bed linen and sheets 6 daN load at 3mm</p>	N.A
	Verification	N.A	ISO 13936-1 or ISO 13936-2	N.A
Colour fastness to washing	Requirement	At least 3-4 for colour change and staining It does not apply to products labelled "dry clean only", to white products or products that are neither dyed nor printed or to non-washable furniture fabrics.	Level 3-4 for colour change and discolouration It does not apply to white products, products that are neither dyed nor printed or non-washable furniture fabrics.	At least levels 3-4 according to ISO 105-A03 or A04 and A02 or A05. It does not apply to products labelled "dry clean only," indigo-dyed denim, or end products that are neither dyed, printed nor non-washable furniture fabrics.
	Verification	For domestic washing, ISO 105 C06. For industrial washing, ISO 15797 combined with ISO 105 C06.	Test method for wash: ISO 105 C06. Test method for dry cleaning: ISO 105 D01	ISO 105-C06
Colour fastness to perspiration	Requirement	At least levels 3-4 according to ISO 105. It does not apply to white products, products neither printed or dyed, furniture fabrics, curtains, and similar textiles intended for interior decoration	Underwear, sportswear, and t-shirts must meet: For discolouration: level 4 -For staining: level 4	At least levels 3-4 according to ISO 105-A03 or A04 and A02 or A05. It does not apply to printed or dyed products, curtains, and similar textiles intended for interior decoration except cushions.

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
(acid alkaline)			Level 3 is permitted for textiles that are dark in colour and/or made from recycled wool. It does not apply to white products or end products that are neither dyed nor printed.	
	Verification	ISO 105 E04		
Colour fastness to saliva	Requirement	N.A	Baby clothes must meet the following standards: -For discolouration: level 4 -For staining: level 4 Level 3 is permitted for textiles that are dark in colour and/or made from recycled wool. This requirement does not apply to white products or end products that are neither dyed nor printed.	Colour fast level 5 for baby and children products according to DIN 53160-1. This requirement does not apply to end products that are neither dyed nor printed.
	Verification	N.A	ISO 105-A06	§64 of the LFGB, B 82. 92-3 and BVL B 82.92-13 in combination with DIN 53160-1
Colour fastness to wet rubbing	Requirement	At least level 2-3. Level 2 allowed for dark-dyed denim. Level of 1 for all other denim colour shades It does not apply to white products, products neither printed nor dyed.	At least level 3-4 It does not apply to white products, products neither printed nor dyed Dark coloured denim level 1-2 Medium-coloured denim level 2-3	At least levels 2-3. For dark colours level 2, according to DIN EN ISO 105-A03 or A04 and A02 or A05. It does not apply to dyed or printed.
	Verification	ISO105 X12		
Colour fastness to dry rubbing	Requirement	At least level 4. Levels 3-4 are allowed for dark-dyed denim. Level of 2-3 for all other denim colour shades It does not apply to white products, products neither printed nor dyed, curtains, and similar textiles intended for interior decoration.	At least level 4. It does not apply to white products, products neither printed nor dyed, curtains, and similar textiles intended for home furnishing textiles. Dark-coloured denim level 3	At least levels 3-4 for dark colours and level 3 for denim. It does not apply to dyed or printed interior decoration.
	Verification	ISO105 X12		
Colour fastness to light	Requirement	At least level 5 for furniture, curtains, or drapes. At least level 4 for all other products. It does not apply to mattress ticking, mattress protection, or underwear.	At least level 5 for outdoor wear, swimwear, UV-protecting clothing, furniture, curtains, and drapery. The requirement does not apply to white textiles, mattress covers, and mattress protectors.	At least level 5 for furniture, curtains, or drapes. At least level 4 for all other products, This requirement does not apply to mattress ticking, protection, or underwear.

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
	Verification	ISO105 B02		
Wash resistance and absorbency of cleaning products	Requirement	Woven and non-woven products for wet cleaning 80 washes, 40°C Microfibre products for dusting 200 washes, 40°C Products deriving from recycled textile fibres 20 washes, 30°C Mop for washing floors 200 washes, 60°C Cloths for washing floors 5 washes 30°C Absorbency of cleaning products Products deriving from recycled textile fibres, Microfibre products for surface and floor cleaning, woven and non-woven products for wet cleaning, and products for washing floors <= 10 seconds	N.A	N.A
	Verification	EN ISO 6630	N.A	N.A
Resistance to abrasion	Requirement	N.A	Number of rubs/abrasions (Martindale) 50.000 cycles for commercial upholstery 30.000 cycles for workwear for outdoor use and domestic upholstery 20.000 cycles for workwear for indoor use, trousers, shorts and skirts, sportswear, ski clothing and other outdoor wear, swimwear 16.000 cycles for jackets and coats 12.000 cycles for T-shirts, blouses, shirts and dresses 10.000 cycles for lingerie, pyjamas, and other nightwear, bed linen, and sheets 8.000 cycles for knitting	N.A
	Verification	N.A	EN ISO 12947-2	N.A
Resistance to pilling	Requirement	Minimum of 3 for non-woven fabrics and knitted garments, accessories, and blankets made of wool, wool blends, and polyester woven cotton. Minimum of 2 for polyamide tights and leggings.	Minimum of 4 for clothing woven fabric, fleece, and upholstery for professional use. Minimum of 3-4 for upholstery for private use and upholstery of wool or wool blends for professional use. Minimum of 2-3 for clothing woven fabric with raised surface and knitting.	Non-woven fabrics and knitted garments, accessories, and blankets made of wool, wool mixes, and polyester must resist pilling up to a minimum rating of 3. Woven cotton fabrics used for garments must also resist pilling up to a minimum rating of 3. Polyamide tights and leggings must resist pilling up to a minimum rating of 2.
	Verification	-Knitted and non-woven: ISO 12945-1 Pill box method -Woven: ISO 12945-2 Martindale method	ISO 12945-2	-Knitted and non-woven: ISO 12945-1 Pill box method -Woven: ISO 12945-2 Martindale method

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
Durability of function	Requirement	<p>Oil repellents shall retain the functionality of 3.5 out of 4 Stain repellents shall retain functionality of 3.0 out of 5.0</p> <p>Washable products shall retain functionality after 50 industrial wash and tumble dry cycles at a minimum of 75°C. Non-washable products shall retain their functionality after a soak test.</p> <p>Natural fibres shall achieve an SA-3 fabric smoothness grade. Blended natural and synthetic fibres with an SA-4 fabric smoothness grade after 10 domestic wash and tumble-drying cycles at 40°C.</p>	N.A	<p>Water repellents shall retain the functionality of 80 out of 90 after 5 domestic wash and tumble dry cycles at 40°C or after 5 industrial washing and drying cycles at a minimum of 75°C. Industrial washing temperatures may be reduced to 60°C for garments with taped seams. Care instructions on the reimpregnation of the product must be supplied with the textile.</p> <p>Washable products shall retain functionality after 25 industrial wash and tumble dry cycles by care instructions. Non-washable products shall retain their functionality after a soak test.</p> <p>Natural fibre products shall achieve an SA-3 fabric smoothness grade. Blended natural and synthetic fibres with an SA-4 fabric smoothness grade after 10 domestic wash and tumble-drying cycles at 40°C.</p>
	Verification	<p>Water repellent function Domestic washing ISO 6330 in combination with ISO 4920 Industrial washing ISO15797 in combination with ISO 4920</p> <p>Oil repellent function Domestic washing ISO 6330 in combination with ISO 14419 Industrial washing ISO 15797 in combination with ISO 14419</p> <p>Stain repellent function Domestic washing ISO 6330 in combination with ISO 22958 Industrial washing ISO 15797 in combination with ISO 22958</p> <p>Flame retardant Domestic washing ISO 6330 in combination with ISO 12138 Industrial washing ISO10528 in combination with ISO 12138</p> <p>Easy care function ISO 7768</p>	N.A	<p>Water repellent function Domestic washing ISO 6330 in combination with ISO 4920 Industrial washing ISO15797 in combination with ISO 4920</p> <p>Flame retardant Domestic washing ISO 6330 in combination with ISO 12138 Industrial washing ISO10528 in combination with ISO 12138</p> <p>Easy care function ISO 7768</p>

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Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
Substance restrictions or specific chemical requirements	Requirement restricted substances	The 3 labels refer to restrictions imposed by REACH (1907/2006/EC), the Candidate List of substances of very high concern for Authorisation with reference to ECHA, and CLP Regulation (EC/1272/2008) and Restricted Substances List (RSL by REACH), with the following indications: *EUEL and BA approach per process/service; meanwhile, NS focuses on categorising ingoing substances. *at the general level, EUEL lists products included in product categories. Meanwhile, NS and BA highlight the general substance category, except where lists are also indicated. *most substances with requirements indicated in the 3 ecolabels coincide, including most of the testing methods, with some exceptions, and are presented in different manners that could be different naming and quantification (as units of measurement).		
		Halogenated carriers (referred to in Nordic Ecolabel and Blue Angel as chlorinated agents) for bleaching and dyeing	Chlorinated solvents as carriers agents (referred to as Halogenated carriers in EUEL)	Chlorinated solvents and carriers agents (Halogenated carriers in EUEL) for bleaching. The only label indicating limits for chlorinated benzenes and toluenes.
		Azo dyes (25 azo dyes listed)	Azo dyes (35 azo dyes listed): additional from EUEL and Blue Angel are the 10 following: 2-amino-4-nitrophenol 99-57-0 m-phenylenediamine 108-45-2 2-amino-5-nitrothiazole 121-66-4 2-amino-5-nitrophenol 121-88-0 p-aminophenol 123-30-80 p-phenetidine 156-43-4 2-methyl-phenylenediamine,2,5diaminotoluene 615-50-9 2-methyl-phenylenediamine,2,5diaminotoluene 95-70-5 2-methyl-phenylenediamine, 2,5 diaminotolunene 25376-45-8 6-chloro-2,4-dinitroaniline 3531-19-9	Azo dyes (25 azo dyes listed)
		CMR dyes and Potentially sensitising dyes	Not specifically mentioned	CMR dyes and potentially sensitising dyes
		Chrome mordant dyes are not permitted.	Mention of chromium in metal dyes	Chrome mordant dyes are not permitted
		Metal complex dyes based on copper, chrome, and nickel shall only be permitted for dyeing: wool, polyamide, and blends of wool and/or polyamide with man-made cellulose fibres.	Only metal complex dyes and pigments based on copper that comprise a maximum of 5% by weight may be used to dye wool, polyamide, a blend of wool, and/or polyamide with regenerated cellulose fibre.	No specific mention (but testing measures for direct and indirect discharge of wastewater)
		Plastisol binders banned	mentioned just in Re-used textiles, hides/skins, leather	restriction less than 1,000mg/Kg
		Biocide finishes banned	Biocides and antibacterial banned	Biocides are banned, but in-con preservatives are permitted
		Anti-felting and shrink resistance restricted	not specifically mentioned	Anti-felting and shrink resistance restricted

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
		Water, stain and oil repellent treatments	not specifically mentioned	Water, stain and oil repellent treatments
		Flame retardants (list of banned substances included)	Flame retardants (general term) banned	Flame retardants (general term) banned
		not specifically mentioned	not specifically mentioned	Cerium compounds restricted
		Biodegradability: 95% (additional indication: eliminable in wastewater treatment plants)	Biodegradability: similar requirements 95% indicated	Biodegradability: 90% (additional indication: eliminable in wastewater treatment plants)
		APEO generally indicated		APEO specified in the treatment of wool and water discharges
		EDTA, DTPA, and more are generally prohibited substances	EDTA and DTPA in generally prohibited substances	EDTA and DTPA are mentioned only in bleaching processes in regenerated fibres
		N,N-Dimethylacetamide % limits of 0.001%w/w for babies and children under 3 products, 0.005% w/w for products in direct contact with skin and garments with limited contact and interior textiles	not specifically mentioned	N, N-dimethylacetamide, dimethylformamide, and N-methyl pyrrolidone are restricted to 0.1% by mass.
		Formaldehyde residues measured in ppm (16 ppm), but the same verification tests		Formaldehyde residues are measured in mg/kg (20 mg/kg), but the same verification tests.
		Organotin compounds and Chlorophenols are generally indicated and listed	Organotin compounds and Chlorophenols generally indicated	Organotin compounds and Chlorophenols (limits indicated) extended list compared to EUEL and NS
		Prohibited phthalates listed	Prohibited phthalates generally mentioned	Prohibited phthalates listed
		Extractable metals (mg/kg) apply to products intended for babies and children under 3 years old and accessories; the list does not coincide.	Extractable metals - Referred to as Heavy metals measured in ppm, the list does not coincide.	Extractable metals (mg/kg), the same list as EUEL, are also included in accessories.
		Carcinogenic substances referred to in Article 57 of REACH	Carcinogenic substances indicated in the document	Carcinogenic substances referred to in Article 57 of REACH
		Endocrine disruptors in Article 57 of REACH	Endocrine disruptors referencing the EU ED LISTS	Endocrine disruptors in Chapter 1 of the ZDHC MRSL
		Substances referred to in Article 59 of REACH	not specifically mentioned	Substances referred to in Article 59 of REACH
		not specifically mentioned		refers to ZDHC MRSL
		not specifically mentioned	Nanomaterial generally approached	Nanomaterials with H (hazard) phrases
		not specifically mentioned	Silicones, Linear alkylbenzene sulphonates (LAS)	not specifically mentioned
		not specifically mentioned	Polycyclic aromatic hydrocarbons are not comparable with Blue Angel	Polycyclic aromatic hydrocarbons are not similar with Nordic Swan
		not specifically mentioned		Mineral oil defoamers, enzymatic processes, content of soluble proteins from natural rubber, Free aniline in jeans products,

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
				Perfluorinated and polyfluorinated chemicals (PFCs) in hydrophobised textiles, Chinoline/quinoline
	Requirement hazardous substances	Additional hazards are indicated in comparison to Nordic Swan and Blue Angel. Below are the differentiating elements: Acute toxicity: H304 (R65) and EUH070 (R39/41) -different than Nordic Swan Specific target organ toxicity: H371 (R68/20, R68/21, R68/22) and H373 (R48/20, R48/21, R48/22) -different than Nordic Swan Respiratory and skin sensitisation, carcinogenic, mutagenic or toxic for reproduction (divided in Nordic Swan: Germ cell mutagenicity*, Carcinogenicity*, Reproductive toxicity*), Hazardous to the aquatic environment, (H412 (R52/ 53) and H413 (R53)-different than Nordic Swan)Respiratory and skin sensitisation, carcinogenic, mutagenic or toxic for reproduction (divided in Nordic Swan: Germ cell mutagenicity, Carcinogenicity, Reproductive toxicity), Hazardous to the aquatic environment, (H412 (R52/ 53) and H413 (R53)-different than Nordic Swan) Hazardous to the ozone layer (EUH059 (R59)-different than Nordic Swan).	Less than EUEL and Blue Angel. Below are missing hazard phrases: Acute toxicity: H304 (R65) and EUH070 (R39/41)- different than EUEL and Blue Angel Acute toxicity: H304 (R65) and EUH070 (R39/41)-different than EUEL and Blue Angel Specific target organ toxicity: H371 (R68/20, R68/21, R68/22) and H373 (R48/20, R48/21, R48/22)-different than EUEL and Blue Angel Respiratory and skin sensitisation, carcinogenic, mutagenic or toxic for reproduction (divided in Nordic Swan: Germ cell mutagenicity*, Carcinogenicity*, Reproductive toxicity*) -different than EUEL and Blue Angel Respiratory and skin sensitisation, carcinogenic, mutagenic or toxic for reproduction (divided in Nordic Swan: Germ cell mutagenicity, Carcinogenicity, Reproductive toxicity) - different than EUEL and Blue Angel Hazardous to the aquatic environment: H412 (R52/ 53) and H413 (R53)-different than EUEL and Blue Angel Hazardous to the ozone layer (EUH059 (R59)- different than EU EL but identical with Blue Angel due to H420).	Less than EUEL. Below are missing hazard phrases: Acute toxicity: EUH070 (R39/41) -different than EU EL Specific target organ toxicity: no difference with EU EL Respiratory and skin sensitisation, carcinogenic, mutagenic, or toxic for reproduction (referred to in Blue Angel as Carcinogenic, mutagenic, and reprotoxic substances)-no difference with EU EL Hazardous to the aquatic environment (referred to in Blue Angel as Water-hazardous substances)-no difference with EU EL Hazardous to the ozone layer (EUH059 (R59)-different than EU EL but identical with Nordic Swan due to H420).
	Verification	Mainly, the provision of declarations of compliance with the requirements is supported by evidence such as technical datasheets or test reports showing fulfilment of the requirement. Manufacturing facilities, associated chemical providers, and analytical labs must adhere to the outlined testing procedures. Where required, product analysis tests shall be conducted yearly throughout the licensing term, and the results must be forwarded to the relevant authoritative organisation for confirmation.		
Washing, drying and curing energy efficiency	Requirement	Similar general BAT themes: 1. general energy management, 2. washing and rinsing, and 3. drying and curing using stretchers		
		Similar 15 techniques among the 3 ecolabels	2 additional techniques are almost identical to Blue Angel: 1) Combining multiple wet treatments into one process. 2) Using solar thermal panels, solar photovoltaic panels, or a heat recovery system for hot water, aiming to generate energy amounting to 30% of what the process requires.	Almost identically presented techniques with Nordic Swan
	Verification	The same testing: I SO 50001 or equivalent systems for energy or carbon dioxide emissions		

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
Treatment of emissions to water	Requirement	<p>Emissions to water: <u>TREATED:</u> 20 g COD/kg textiles processed: applied to weaving, dyeing, printing, and finishing processes used to manufacture the product(s). Measured downstream of on-site wastewater treatment plant and/or off-site wastewater treatment plant receiving wastewater from these processing sites. <u>DIRECT DISCHARGE:</u> IF Effluent is treated on-site and discharged directly to surface waters: 1) pH between 6,0 and 9,0 (unless the pH of the receiving water is outside this range) 2) temperature of less than 35C (unless the temperature of the receiving water is above this value) If colour removal is required:436 nm (yellow sector) 7 m-1, (ii) 525 nm (red sector) 5 m-1, (iii) 620 nm (blue sector) 3 m-1- with BA</p>	<p>Emissions to water: <u>TREATED:</u> COD (chemical oxygen demand) in wastewater from wet processes which is discharged to surface water after treatment shall not exceed 150 mg/L <u>DIRECT DISCHARGE:</u> The pH value of the wastewater released to the surface water shall be between 6 and 9 (unless the pH value in the recipient lies outside this interval). The wastewater released to the surface water shall be lower than 40°C (unless the temperature in the recipient is higher).</p>	<p>Emissions to water: •COD: 100 mg/l (expressed as an average yearly value), • BOD5: 30 mg/l, • Sulphite: 1 mg/l, • Ammonium nitrogen: 10 mg/l, • Total nitrogen: 15 mg/l, • Total phosphorous: 2 mg/l, The dye must comply with the following values: Spectral absorption coefficient at with EUEL *436 nm (yellow spectral region) 7 m-1 *525 nm (red spectral region) 5 m-1 *620 nm (blue spectral region) 3 m-1 • Toxicity to fish eggs GEI: 2 • The pH value of the wastewater discharged to surface waters must be between 6 and 9 (unless the pH value of the receiving waters is outside this range), and the temperature must be below 35 °C (unless the temperature of the receiving waters is already above this limit). Before mixing (direct and indirect discharge) • AOX: 0.5 mg/l, • Sulphide: <=1 mg/l, • Copper: 0.4 mg/l, • Nickel: 0.2 mg/l, • Total chromium: 0.3 mg/l, • Tin: 2 mg/l, • Zinc: 0.8 mg/l, • Antimony: 1.2 mg/l</p>

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
	Verification	Detailed documentation and test reports, using ISO 6060 and ISO 7887 as relevant+ compliance with this criterion based on monthly averages for the six months preceding the application	COD content shall be tested by ISO 6060 or equivalent. test report+ procedure in place for annual testing in line with the requirement and for ensuring compliance with the requirement Report showing average monthly calculations of COD, pH, and temperature for at least three of the past 12 months	Declare compliance, declaration of conformity from the operator of the textile finishing plant and test reports verifying compliance TEST METHODS: COD: ISO 6060 or DIN 38409-41 or DIN 38409-44 or DIN ISO 15705, BOD: DIN EN 1899-2 or ISO 5815-1, Copper and nickel: ISO 8288, Total chromium: ISO 9174 or DIN EN 1233, Sulphide: DIN 38405-27 or ISO 10530, Sulphite: DIN EN ISO 10304-3, Toxicity to fish eggs: DIN EN ISO 15088, AOX (chloride content < 5g/l): DIN EN ISO 9562, Spectral absorption coefficient: DIN 38404-3, Ammonium nitrogen: DIN EN ISO 11732, Total nitrogen: DIN EN ISO 12260, Total phosphorus: DIN EN ISO 11885, Tin: DIN EN ISO 11885, Zinc: DIN EN ISO 11885, Antimony: DIN EN ISO 11885 The wastewater treatment plant must be regularly monitored(at least every six months)
Treatment of emissions to air	Requirement	Emissions to air: Emission of organic compounds (not comparable with the other eco-labels) from thermosetting, thermosoling, coating, and impregnating textiles, including their respective drying (centre) facilities.	Emissions to air: Emissions from printing pastes and foamed synthetic materials indicating different substances (not comparable with other ecolabels)	Emissions to air: Emission of organic compounds to air in the textile finishing process in thermosetting, thermosoling, coating, impregnating, or finishing of textiles (not comparable with the other ecolabels) Additional emission from firing systems in the textile finishing process in thermosetting, thermosoling, coating, impregnating, or finishing of textiles with a strict list of limitations

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
	Verification	Compliance according to EN 12619 or other equivalent standards. Monthly averages for the total emissions of organic compounds from production sites shall be provided for the six months preceding the application.	Declaration from the producer or supplier and emission testing according to the ISO 16000 standard, parts 3, 6, 9, & 11	Compliance by DIN EN 12619 (total gaseous organic carbon), DIN CEN/TS 17638 (formaldehyde) and DIN EN ISO 21877 (ammonia). For firing systems: testing: Depending on the heating capacity, the heating boilers must be tested as follows: - 0.3 MW to 2 MW every 3 years - > 2 MW at least yearly - > 5 MW continuously

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6945 **Table 111.** Corporate social responsibility - comparison among Ecolabels

Topic	Requirement / Verification	EU Ecolabel	Nordic Swan	Blue Angel
Fundamental principles and rights at work	Requirement	Worker principles based on ILO Conventions. UN Global Compact and OECD Guidelines for Manufacturing Principles.	Must comply with the relevant national laws and regulations and the ILO Conventions. Some extra requirements were added for product licenses.	Must comply with the social and human rights requirements for the Green Button 2.0
	Verification	Third-party verification, including site visits by auditors. In countries where the ILO Labour Inspection Convention, 1947 (No 81) has been ratified, ILO supervision indicates that the national labour inspection system is effective and verification by labour inspector(s) appointed by a public authority shall be accepted.	Third-party verification (BSCI audit report) or SA8000 certificate for manufacturing. Description of code of conduct, policy and routine for produce licence.	Test report from an auditing body or SA8000 certificate.
Restriction on the sandblasting of denim	Requirement	Manual and mechanical sandblasting is prohibited.	Manual and mechanical sandblasting is prohibited. The use of potassium permanganate is not permitted.	
	Verification	The applicant must provide details of all production sites—evidence of the alternative processes to achieve distressed denim finishes.	Declaration stating the method used and that the requirement is fulfilled.	The applicant must provide details of all production sites. Evidence of the alternative processes used to achieve distressed denim finishes. Confirmation that no mechanical sandblasting or potassium permanganate is used.

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Table 112. Miscellaneous criteria - comparison among Ecolabels

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
Information appearing on the Ecolabel	Requirement	<p>The label may optionally contain text like:</p> <ul style="list-style-type: none"> - More sustainable fibre production or a text defined in ECOLABEL, depending on product content. -Less polluting production processes -Restrictions on hazardous substances -Tested for durability 	<p>Mandatory information:</p> <ul style="list-style-type: none"> - Product Type - Name and the fibre composition -All fabrics, their name, and % by weight -Membranes/coatings, impregnations or laminates -Details/accessories with information on the material type -Fillings and stuffing with information of the material type -Information on all recycled or biobased materials -If reused 	<p>Fibres are used by Regulation EC 1007/2011. Care and cleaning information (textile care symbols) by GINETEX or ISO EN DIN3758 and ISO10023 for industrial washing textiles. Information on repairable or replaceable parts of the textile.</p>
	Verification	Label sample + DoC	Schematic overview	Label sample + DoC
Packaging	Requirement	N.A	<p>PVC must not be used</p> <ul style="list-style-type: none"> -It shall be possible to recycle the main material - Only monomaterials shall be used. Multi-material hangers are allowed if reused in a textile manufacturer's take-back system. - Plastic packaging shall be made from PE, PP, or PET. - Coloured plastic cannot be used for virgin plastic feedstock. Only if at least 50% by weight of the plastic is recycled material is colouring permitted. - Information on how it can be sorted for recycling - Chlorophenols and their salts, PCB, and organotin compounds shall not be used in transport or storage. 	<p>Mandatory description. Unnecessary packaging must be avoided. Composite packaging is not permitted and may not contain any dimethyl fumarate. The requirements apply to repackaging and transport, sales, and delivery of packaging directly used by the applicant. Clothes hangers are exempt.</p>
	Verification	N.A	<p>Declaration of Compliance about who is responsible for the product's primary packaging.</p> <p>Declaration of Compliance about PVC from the manufacturer of plastic material.</p> <p>Description of the main material and how it can be recycled.</p> <p>Description of primary packaging documenting compliance.</p> <p>Multi-material hangers: textile manufacturer's procedure describing the take-back system for hangers.</p> <p>Product labels or artwork providing information on recycling.</p> <p>Suppliers must declare that chlorophenols are not used in the yarn, fabric, or end product or have a valid license certificate for the EU Ecolabel.</p>	<p>DoC and a description of the intended packaging solution, designation and composition, raw materials and their origin, and a sample of the product packaging where relevant.</p>
Unsold textiles	Requirement	N.A	<p>Unsold textiles must not be sent for incineration or dumped in landfills.</p> <p>The brand owner must inform Nordic Swan Ecolabelling and state how they deal with unsold products on their website.</p>	N.A

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
			Products with contaminations that are harmful to the environment or health are exempt. Military and police uniforms are exempt.	
	Verification	N.A	Description of how unsold products are dealt with and its procedure.	N.A
Reused textiles	Requirement	N.A	The material shall not come from workwear and other textiles used in the chemical and oil industry -The material must not contain plastisol print - Textiles from the health care sector must be washed, inactivating microorganisms. - Material originally eco-labelled with the Nordic Swan Ecolabel, the EU Ecolabel, GORS, or Bra Miljöval or have Oeko-Tex 100 or only be used for furnishing fabrics such as rugs, tablecloths If re-designed for professional use, the product must fulfil the expected function. If processed with chemical products, the requirements for chemicals must be accomplished.	N.A
	Verification	N.A	Invoice or label on the textile -Documentation showing that the textile used is reused - Declaration that the textile has been washed in an industrial laundry in a microbiological wash - Declaration that The material does not contain PVC	N.A
Reduced washing	Requirement	N.A	The text "Reduce the number of washes and help save energy and reduce climate impact" must be included.	N.A
	Verification	N.A	Photo	N.A
Production Chain	Requirement	N.A	Description of all the production methods/treatment techniques, including production by suppliers. -Name of the fibres, yarns, and fabrics -Information of all the actors in the production chain	N.A
	Verification	N.A	Schematic overview	N.A

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
Materials limitations	Requirement	N.A	<p>The sewing thread is not covered</p> <ul style="list-style-type: none"> -Embroidery thread applies chemical requirements -Belt buckles of metals must not exceed 25% by weight -Fibre types with less than 5% by weight are exempt. -Small textile elements present between 5% to 10% by weight may be exempted from the requirements of the textile element has an EU-Ecolabel or GOTS or Oeko Tex 100 class I certificate - For elastic bands, up to a total of 25% of the product's weight may be exempted from the requirements if GOTS or Oeko-Tex 100 class I certification - Information printed directly on the textile product must meet the requirements of prohibited substances 	N.A
	Verification	N.A	Declaration of Compliance and certificate where applicable. If Oeko Tex 100: Statement regarding fluorinated organic compounds	N.A
Quality and regulatory requirements	Requirement	N.A	<p>Written documentation obtained annually showing that suppliers are familiar with Nordic Swan Ecolabel's requirements. Supplier changes must be approved. An individual responsible for ensuring the fulfilment should be appointed.</p> <p>The licence must guarantee the quality of the labelled product during the validity period.</p> <p>Written notice must be given in case of changes.</p> <p>Nonconformities must be reported.</p> <p>Traceable product.</p>	N.A
	Verification	N.A	Documentation, operational chart and procedures description.	N.A
Traceability of the Nordic Swan Ecolabelled product	Requirement	N.A	The brand owner is responsible for ensuring that a Nordic Swan Ecolabelled product can be traced back to a production licence.	N.A
	Verification	N.A	<ul style="list-style-type: none"> -The brand owner must submit the information specified in the requirement. - A description of the procedure, which shows how it is ensured that the information held by Nordic Ecolabelling is kept updated. 	N.A

6949 **Table 113.** Dyes restriction - comparison among Ecolabels

Topic	Requirement/ Verification	EU Ecolabel	Nordic Swan	Blue Angel
Carcinogenic aromatic amines	Requirement	The same 25 dyes listed, limitation: 30 mg/kg for each amine	Prohibited: the same 25 dyes listed + 10 additional dyes	The same 25 dyes listed limitation: 20 mg/kg for each amine
	Verification	Test results: EN 14362-1 and 3.	Prohibited: Declaration from the chemical manufacturer or chemical supplier that the requirement is fulfilled	Test results: EN 14362-1 and 3.
List of dyes that may cleave to carcinogenic aromatic amines	Requirement	An extended list of prohibited disperse, basic, acid and direct dyes limitation: 30 mg/kg for each amine	There is no specific dyes list, but in the section addressed to recycled fibres, there are limitations for cleavable dyes according to Oeko-Tex 100 Annex 5	Azo dyes that may cleave to one of the aromatic amines must not exceed a limit value of 20 mg/kg.
	Verification	Test results: EN 14362-1 and 3.	Cleavable, classified as carcinogenic in Oeko-Tex Annex 5: Total 20 mg/kg Cleavable aniline as listed in Oeko-Tex Annex 5: Total 100 mg/kg Test reports or Oeko-Tex 100 class I certificate showing fulfilment of the requirement	20 mg/kg for each dye Test results by the test method DIN EN 14362-1 and, DIN EN 14362-3 (for arylamine), and DIN 54231 (for dispersion dyes).
Dyes that are carcinogenic, mutagenic or toxic to reproduction	Requirement	List of prohibited dyes	There is no specific dyes list but criterion 034. Prohibition of CMR substances refers to carcinogenic, mutagenic or toxic to reproduction substances in general.	Extended list of prohibited dyes
	Verification	Prohibited. Declaration of non-use from the chemical supplier supported by SDS.	Declaration from the chemical producer that the requirement has been fulfilled.	Declaration from the chemical producer that the requirement is fulfilled and test results by the test method DIN EN 14362-1 and DIN EN 14362-3 (for arylamine)
Disperse dyes that are potentially sensitising	Requirement	List of prohibited dyes	There is no specific dyes list but criterion 033. Classification of chemical products refers to sensitising on inhalation or skin contact substances.	Extended list of prohibited dyes
	Verification	Prohibited. Declaration of non-use from the chemical supplier supported by SDS.	Declaration from the chemical producer that the requirement has been fulfilled.	Declaration from the chemical producer that the requirement is fulfilled and test results by the test method DIN EN 14362-1 and DIN EN 14362-3 (for arylamine)+

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6953 **10.8 Supporting information about public procurement**

6954 **10.8.1 The Common Procurement Vocabulary (CPV) codes for products in the scope**

6955 **Table 114.** The Common Procurement Vocabulary (CPV) codes for products in the scope

Product category	Common Procurement Vocabulary (CPV) code
T-shirts	18000000-9*: Clothing, footwear, luggage articles and accessories 18300000-2*: Garments 18318400-5: Vests 18330000-1*: T-shirts and shirts 18331000-8: T-shirts 18235400-9: Waistcoats 18400000-3*: Special clothing and accessories 18410000-6*: Special clothing 18411000-3*: Baby clothing
Shirts and blouses	18000000-9*: Clothing, footwear, luggage articles and accessories 18300000-2*: Garments 18318000-1*: Nightwear 18318100-2: Nightshirts 18318200-3: Dressing gowns 18318300-4*: Pyjamas 18318500-6: Nightdresses 18330000-1*: T-shirts and shirts 18332000-5: Shirts 18333000-2: Polo shirts 18400000-3*: Special clothing and accessories 18410000-6*: Special clothing 18411000-3*: Baby clothing
Sweaters and mid-layers	18000000-9*: Clothing, footwear, luggage articles and accessories 18235000-5: Pullovers, cardigans and similar articles 18235100-6: Pullovers 18235200-7: Cardigans 18235300-8: Sweatshirts 18300000-2*: Garments 18400000-3*: Special clothing and accessories 18410000-6*: Special clothing 18411000-3*: Baby clothing
Jackets and coats	18000000-9*: Clothing, footwear, luggage articles and accessories 18200000-1: Outerwear 18210000-4: Coats 18211000-1: Capes 18212000-8: Cloaks 18213000-5: Wind jackets 18220000-7: Weatherproof clothing 18221000-4: Waterproof clothing 18221100-5: Waterproof capes 18221200-6: Anoraks 18221300-7: Raincoat 18223000-8: Jackets and blazers 18223100-9: Blazers 18223200-0: Jackets 18224000-5: Clothing made of coated or impregnated textile fabrics 18230000-0: Miscellaneous outerwear 18300000-2*: Garments 18400000-3*: Special clothing and accessories 18410000-6*: Special clothing 18411000-3*: Baby clothing
Pants and shorts	18000000-9*: Clothing, footwear, luggage articles and accessories 18233000-1: Shorts 18234000-8: Trousers 18300000-2*: Garments 18318000-1*: Nightwear 18318300-4*: Pyjamas 18400000-3*: Special clothing and accessories 18410000-6*: Special clothing 18411000-3*: Baby clothing

Product category	Common Procurement Vocabulary (CPV) code
Dresses: Skirts and jumpsuits	18000000-9*: Clothing, footwear, luggage articles and accessories 18222100-2: Suits 18222200-3: Ensembles 18231000-7: Dresses 18232000-4: Skirts 18300000-2*: Garments 18400000-3*: Special clothing and accessories 18410000-6*: Special clothing 18411000-3*: Baby clothing
Leggings: Stockings: Tights and socks	18315000-0: Stockings 18316000-7: Tights 18317000-4: Socks
Underwear	18310000-5: Underwear 18311000-2: Slips 18312000-9: Underpants 18313000-6: Panties 18320000-8: Brassieres, corsets, suspenders and similar articles 18321000-5: Brassieres 18322000-2: Corsets 18323000-9: Suspenders
Swimwear	18412800-8: Swimwear
Accessories	18421000: Handkerchiefs 18422000: Scarves 18423000: Ties 18424000: Gloves 18425000: Belts

6956 * These CPV codes were assigned to more than one product category

6957 Source: own elaboration based on CPV description provided by BIP Solutions ⁽²¹³⁾

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²¹³ BIP Solutions. CPV codes. Available at [this link](#). Last accessed on 12 January 2024.

6959 **10.8.2 Number of Contract Award procuring apparel in EU**

6960 **Table 115.** Number of Contracts Award procuring apparel in EU Member States in 2015

Country	CPV 181	CPV 182	CPV 183	CPV 184	CPV 351	CPV 358	CPV 374	Total in the country
Austria	2	NA	NA	3	NA	NA	NA	5
Belgium	10	1	9	4	NA	1	NA	25
Bulgaria	31	1	NA	NA	NA	4	NA	36
Croatia	2	4	1	2	NA	7	NA	16
Cyprus	NA	1	NA	NA	NA	1	NA	2
Czechia	5	5	2	11	1	5	1	30
Denmark	4	NA	NA	6	NA	NA	NA	10
Estonia	NA	2	1	3	1	NA	1	8
Finland	3	NA	4	4	NA	NA	NA	11
France	93	6	11	11	3	5	2	131
Germany	17	10	11	19	3	17	1	78
Greece	1	NA	NA	NA	NA	NA	NA	1
Hungary	1	NA	NA	NA	NA	NA	NA	1
Ireland	NA	NA	NA	NA	NA	NA	NA	0
Italy	8	7	2	3	NA	3	NA	23
Latvia	3	NA	NA	2	NA	NA	NA	5
Lithuania	8	1	3	5	2	5	NA	24
Luxembourg	NA	NA	NA	NA	NA	NA	NA	0
Malta	NA	1	NA	NA	NA	NA	NA	1
Netherlands	3	4	1	4	1	1	NA	14
Poland	18	13	9	21	3	11	NA	75
Portugal	7	1	NA	NA	NA	NA	NA	8
Romania		1	1	4	NA	2	NA	8
Slovakia	2	1	NA	5	NA	NA	NA	8
Slovenia	5	2	NA	NA	NA	3	NA	10
Spain	5	NA	NA	1	NA	1	NA	7
Sweden	13	NA	2	2	NA	NA	2	19
Total per CPV code	241	61	57	110	14	66	7	556

6961 CPV 181: CPV 181XXXXX-X Occupational clothing, special workwear and accessories;

6962 CPV 182: CPV 182XXXXX-X Outerwear;

6963 CPV 183: CPV 183XXXXX-X Garments;

6964 CPV 184: CPV 184XXXXX-X Special clothing and accessories;

6965 CPV 351: CPV 351134XX-X Protective and safety clothing;

6966 CPV 358: CPV 3581XXXX-X Individual and support equipment;

6967 CPV 374: CPV 3741XXXX-X Sport goods and equipment.

6968 *Source: own elaboration based on Tenders Electronic Daily (TED) (csv subset) – public procurement notices (129).*

6969

6970 **Table 116.** Number of Contracts Award procuring apparel in EU Member States in 2016

Country	CPV 181	CPV 182	CPV 183	CPV 184	CPV 351	CPV 358	CPV 374	Total in the country
Austria	6	NA	4	1	NA	1	1	13
Belgium	11	4	2	3	NA	3	NA	23
Bulgaria	23	1	NA	1	NA	16	NA	41
Croatia	4	1	1	NA	1	4	NA	11
Cyprus	NA	NA	1	NA	NA	1	NA	2
Czechia	5	9	2	6	2	7	NA	31
Denmark	4	NA	3	1	1	2	1	12
Estonia	2	NA	1	1	NA	1	NA	5
Finland	7	NA	2	1	NA	1	NA	11
France	106	9	11	7	11	10	3	157
Germany	25	10	10	4	6	17	NA	72
Greece	1	NA	NA	NA	NA	NA	NA	1
Hungary	1	NA	NA	1	NA	4	1	7
Ireland	NA	NA	NA	2	NA	NA	NA	2
Italy	5	6	6	1	2	10	NA	30
Latvia	1	NA	1	NA	NA	2	NA	4

Country	CPV 181	CPV 182	CPV 183	CPV 184	CPV 351	CPV 358	CPV 374	Total in the country
Lithuania	3	2	4	9	2	5	1	26
Luxembourg	1	NA	NA	NA	NA	NA	NA	1
Malta	1	NA	NA	NA	NA	NA	NA	1
Netherlands	9	6	1	1	1	1	NA	19
Poland	14	11	4	7	9	12	1	58
Portugal	9	NA	NA	NA	NA	1	NA	10
Romania	2	NA	2	NA	NA	2	NA	6
Slovakia	2	6	2	1	NA	NA	NA	11
Slovenia	11	3	NA	NA	1	7	NA	22
Spain	NA	NA	NA	NA	NA	1	NA	1
Sweden	32	NA	3	NA	1	NA	3	39
Total per CPV code	285	68	60	47	37	108	11	616

6971 CPV 181: CPV 181XXXXX-X Occupational clothing, special workwear and accessories;

6972 CPV 182: CPV 182XXXXX-X Outerwear;

6973 CPV 183: CPV 183XXXXX-X Garments;

6974 CPV 184: CPV 184XXXXX-X Special clothing and accessories;

6975 CPV 351: CPV 351134XX-X Protective and safety clothing;

6976 CPV 358: CPV 3581XXXX-X Individual and support equipment;

6977 CPV 374: CPV 3741XXXX-X Sport goods and equipment.

6978 Source: own elaboration based on Tenders Electronic Daily (TED) (csv subset) – public procurement notices ⁽¹²⁹⁾.

6979

6980 **Table 117.** Number of Contracts Award procuring apparel in EU Member States in 2017

Country	CPV 181	CPV 182	CPV 183	CPV 184	CPV 351	CPV 358	CPV 374	Total in the country
Austria	5	1	1	2	1	1	1	12
Belgium	13	1	NA	NA	1	3	NA	18
Bulgaria	25	1	2	5	2	22	NA	57
Croatia	5	4	NA	2	NA	5	NA	16
Cyprus	NA	NA	NA	1	NA	NA	NA	1
Czechia	16	32	24	12	2	21	1	108
Denmark	6	1	2	4	NA	1	1	15
Estonia	2	NA	3	2	NA	NA	NA	7
Finland	9	NA	1	NA	NA	1	NA	11
France	126	7	14	12	12	6	2	179
Germany	37	16	8	5	4	16	2	88
Greece	NA	NA	1	NA	NA	1	NA	2
Hungary	5	NA	NA	2	1	4	NA	12
Ireland	1	NA	NA	NA	NA	NA	NA	1
Italy	9	4	2	3	4	8	NA	30
Latvia	3	NA	NA	4	NA	5	NA	12
Lithuania	5	NA	2	8	2	3	NA	20
Luxembourg	NA	NA	NA	NA	NA	NA	NA	0
Malta	1	1	2	NA	NA	1	NA	5
Netherlands	10	4	2	3	2	4	NA	25
Poland	19	16	16	19	13	18	1	102
Portugal	NA	NA	NA	NA	1	NA	NA	1
Romania	1	NA	1	3	NA	2	NA	7
Slovakia	5	3	4	2	1	1	NA	16
Slovenia	23	2	NA	8	2	6	NA	41
Spain	5	NA	NA	NA	NA	NA	NA	5
Sweden	29	NA	3	NA	2	4	NA	38
Total per CPV code	360	93	88	97	50	133	8	829

6981 CPV 181: CPV 181XXXXX-X Occupational clothing, special workwear and accessories;

6982 CPV 182: CPV 182XXXXX-X Outerwear;

6983 CPV 183: CPV 183XXXXX-X Garments;

6984 CPV 184: CPV 184XXXXX-X Special clothing and accessories;

6985 CPV 351: CPV 351134XX-X Protective and safety clothing;

6986 CPV 358: CPV 3581XXXX-X Individual and support equipment;

6987 CPV 374: CPV 3741XXXX-X Sport goods and equipment.

6988 Source: own elaboration based on Tenders Electronic Daily (TED) (csv subset) – public procurement notices ⁽¹²⁹⁾.

6989

6990 **Table 118.** Number of Contracts Award procuring apparel in EU Member States in 2018

Country	CPV 181	CPV 182	CPV 183	CPV 184	CPV 351	CPV 358	CPV 374	Total in the country
Austria	5	5	4	NA	NA	NA	NA	14
Belgium	26	NA	4	2	1	NA	NA	33
Bulgaria	28	5	3	2	4	25	NA	67
Croatia	3	3	2	1	NA	4	NA	13
Cyprus	NA	NA	NA	NA	NA	NA	NA	NA
Czechia	17	31	20	18	10	22	2	120
Denmark	13	1	NA	6	2	2	NA	24
Estonia	4	3	6	4	1	4	NA	22
Finland	3	3	NA	2	NA	1	NA	9
France	108	4	14	7	15	9	3	160
Germany	33	10	10	4	7	6	NA	70
Greece	2	1	NA	NA	NA	1	NA	4
Hungary	10	NA	NA	1	NA	9	NA	20
Ireland	NA	NA	NA	1	NA	NA	NA	1
Italy	22	2	4	4	2	6	NA	40
Latvia	3	NA	4	9	NA	18	NA	34
Lithuania	12	2	4	4	2	6	2	32
Luxembourg	1	NA	NA	NA	NA	NA	NA	1
Malta	1	1	NA	NA	NA	2	NA	4
Netherlands	8	5	1	3	5	1	NA	23
Poland	39	10	15	26	12	22	NA	124
Portugal	NA	NA	NA	NA	1	NA	NA	1
Romania	21	2	4	NA	NA	9	NA	36
Slovakia	5	2	2	4	1	NA	NA	14
Slovenia	21	1	NA	10	5	10	NA	47
Spain	1	NA	NA	NA	1	NA	NA	2
Sweden	45	2	2	3	NA	1	3	56
Total per CPV code	431	93	99	111	69	158	10	971

6991 CPV 181: CPV 181XXXXX-X Occupational clothing, special workwear and accessories;

6992 CPV 182: CPV 182XXXXX-X Outerwear;

6993 CPV 183: CPV 183XXXXX-X Garments;

6994 CPV 184: CPV 184XXXXX-X Special clothing and accessories;

6995 CPV 351: CPV 351134XX-X Protective and safety clothing;

6996 CPV 358: CPV 3581XXXXX-X Individual and support equipment;

6997 CPV 374: CPV 3741XXXX-X Sport goods and equipment.

6998 Source: own elaboration based on Tenders Electronic Daily (TED) (csv subset) – public procurement notices ⁽¹²⁹⁾.

6999

7000 **Table 119.** Number of Contracts Award procuring apparel in EU Member States in 2019

Country	CPV 181	CPV 182	CPV 183	CPV 184	CPV 351	CPV 358	CPV 374	Total in the country
Austria	4	NA	6	NA	NA	1	NA	11
Belgium	13	2	NA	1	5	2	1	24
Bulgaria	20	4	2	3	4	38	NA	71
Croatia	2	4	NA	NA	NA	3	NA	9
Cyprus	NA	1	NA	1	NA	1	NA	3
Czechia	26	35	41	22	16	34	NA	174
Denmark	9	1	4	1	1	1	NA	17
Estonia	3	3	5	2	NA	1	NA	14
Finland	6	NA	3	1	NA	2	NA	12
France	156	11	10	14	15	6	8	220
Germany	50	14	18	12	8	18	NA	120
Greece	6	1	2	1	2	2	1	15
Hungary	8	NA	NA	1	2	2	NA	13
Ireland	NA	1	NA	NA	1	NA	NA	2
Italy	15	7	7	5	4	10	NA	48
Latvia	6	1	NA	20	1	3	NA	31
Lithuania	23	2	6	13	2	7	NA	53

Country	CPV 181	CPV 182	CPV 183	CPV 184	CPV 351	CPV 358	CPV 374	Total in the country
Luxembourg	NA	NA	NA	NA	NA	NA	NA	0
Malta	NA	NA	1	NA	NA	NA	NA	1
Netherlands	7	10	1	2	3	3	NA	26
Poland	62	15	16	17	27	28	NA	165
Portugal	1	NA	NA	NA	NA	NA	NA	1
Romania	48	11	6	9	1	36	1	112
Slovakia	2	NA	4	4	NA	NA	NA	10
Slovenia	18	NA	2	8	5	8	NA	41
Spain	3	NA	NA	NA	NA	NA	NA	3
Sweden	45	1	4	5	6	NA	4	65
Total per CPV code	533	124	138	142	103	206	15	1261

7001 CPV 181: CPV 181XXXXX-X Occupational clothing, special workwear and accessories;
7002 CPV 182: CPV 182XXXXX-X Outerwear;
7003 CPV 183: CPV 183XXXXX-X Garments;
7004 CPV 184: CPV 184XXXXX-X Special clothing and accessories;
7005 CPV 351: CPV 351134XX-X Protective and safety clothing;
7006 CPV 358: CPV 3581XXXX-X Individual and support equipment;
7007 CPV 374: CPV 3741XXXX-X Sport goods and equipment.
7008 Source: own elaboration based on Tenders Electronic Daily (TED) (csv subset) – public procurement notices ⁽¹²⁹⁾.

7009

7010 10.8.3 Contributions to the initial questionnaire

7011 **Table 120.** Type of respondents that contributed to the section on EU GPP during the initial questionnaire

Type of respondent	Number	Percentage compared to the total (%)
University or research institute	1	3
Certified laboratory	1	3
Government (local, regional, or national)	12	35
Non-governmental organisation – Environment	3	9
Non-governmental organisation – Consumers	0	0
Industry – manufacturing	6	18
Industry – manufacturing - association	2	6
Industry – waste collection, sorting and treatment	1	3
Industry – waste collection, sorting and treatment - association	1	3
Distributor/Retailer	0	0
Distributor/Retailer association	1	3
Other	6	18
TOTAL	34	100

7012 Source: own elaboration

7013

7014 10.9 Supporting information on relevant aspects

7015 10.9.1 Qualitative assessment based on technical, socioeconomic and environmental dimensions

7017 In this section, a qualitative assessment is carried out, focusing on three dimensions, with information collected
7018 via literature review. Only those aspects that are considered relevant after the assessment based on key guiding
7019 questions are evaluated (therefore, every aspect except 'possibility of recovery of materials' is evaluated in this
7020 section).

7021 10.9.1.1 Durability

7022 Durability is the ability of a product to maintain over time its function and performance under specified
7023 conditions of use, maintenance and repair. In the context of textile apparel, durability can be classified as
7024 intrinsic and extrinsic (emotional).

7025 Intrinsic durability refers to physical and measurable characteristics of products, such as fabric strength,
7026 abrasion resistance, pilling, wrinkling, colour fastness, dimensional changes, seam slippage, etc. Intrinsic
7027 durability is often related with product quality, as described in Piippo et al., (2022).

7028 Quality is a fundamental aspect of the durability and usability of clothing, and thus plays a role on its lifespan
7029 (Aakko and Niinimäki, 2021). Extrinsic durability refers to subjective and perception aspects of products, such
7030 as emotional attachment by users. This section focuses only on the intrinsic durability of textile apparel because
7031 it best corresponds to the durability definition provided by the ESPR.

7032 Characteristics of the products in the scope

7033 Durability is directly related with product lifespan. It must be noted that the lifetimes of textile apparel are, to
7034 a degree, subjective (Cooper and Claxton, 2022c). In fact, there is no common approach to assess or guarantee
7035 the physical durability of textile apparel; nor are there legislative standards that apply directly to textile apparel,
7036 other than the general requirement under consumer legislation that goods are 'fit for purpose' (Cooper and
7037 Claxton, 2022c).

7038 Literature review suggests that there is room for improvement in the average durability of textile apparel. In
7039 the current market, many products are well made and have lifetimes that would generally be considered
7040 satisfactory. However, the lifetime of many other products is unduly short due to inadequate performance, in
7041 part due to pressure to meet predetermined price points (Cooper and Claxton, 2022c). It is possible to influence
7042 the intrinsic durability of products with many factors, which include the use of different fibres: for instance, in
7043 the manufacturing of denim products, the utilization of synthetic fibres, linen and hemp -rather than 100%
7044 cotton- can help to produce high-durability denim products particularly with respect to tensile and abrasion
7045 resistance (Elmogahzy, 2020).

7046 The most common physical failures in textile apparel are related to colour fading (particularly for jersey and
7047 woven fabrics) and pilling of knitwear and jersey items. Fabric breakdown (fraying or thinning around the hems)
7048 and wear round the crotch of trousers and jeans, and accidental damage due to stains, tears and rips, are also
7049 common. Other failures include loss of dimensional stability, logo failure, discolouration, holes in seams and
7050 trim failure (Cooper and Claxton, 2022c). Even though they are not the main cause for physical failures, priority
7051 parts such as zippers, buttons, etc., may also have a relevance in product durability.

7052 Environmental

7053 Extending the lifetime of textile apparel has been highlighted as the most effective method of reducing the
7054 impact of the industry on the environment. For instance, extending the average life of clothes by 3 months'
7055 usage per item could reduce carbon, water and waste footprints by 5-10% (Goworek, Lynn Oxborrow, et al.,
7056 2020). Extending the average life of clothes by nine months of active use per item would typically lead to a
7057 reduction in the carbon, water and waste footprints of 27%, 33% and 22%, respectively (Cooper and Claxton,
7058 2022c).

7059 Moreover, almost all life-cycle stages of textile apparel entail significant energy consumption (as described in
7060 Section 3.3.2). Some processes, such as the extraction of raw materials or production processes -such as
7061 spinning, knitting and weaving- are highly energy demanding. The longer the products are in active use by
7062 consumers (the more durable the products), the more likely it is to offset the manufacturing of new products,
7063 thus reducing the industry's impacts related to energy.

7064 Socioeconomic

7065 Durability in the context of textile apparel collides with one of the prevalent business models, based on fast
7066 trend turnovers and short production times. This business model does not offer space for developments to
7067 improve durability of products, as it focuses on short times between design and product availability, and aims
7068 to low pricing obtained with production of large volumes manufactured in specific locations and conditions (Dan
7069 and Ostergaard, 2021). Therefore, an increase in the durability of products may affect negatively manufacturers
7070 whose strategy is based on such business models, since the prevailing commercial drive is to save costs
7071 (Goworek et al., 2020); whereas it could affect positively manufacturers which are already focusing on the
7072 durability of products.

7073 An increase in the durability of textile apparel could stimulate the establishment of other product-related
7074 businesses. Increasing textile apparel durability could be supported by an increase in the number of companies
7075 providing clothing repair services. Moreover, products with enhanced durability seem a necessary condition for
7076 the existence of businesses based on product renting or sharing. These businesses could extend the use of
7077 products and potentially reduce the purchase of new items if they do not incentivise overconsumption.

7078 It is worth noting where the socioeconomic changes of product durability would be perceived. Whereas any
7079 changes in product manufacturing would mostly take place outside the EU (which is where most manufacturing

7080 takes place today) (Section 5.1), the effects related with repair, renting and sharing services would be
7081 experienced within the EU.

7082 Consumers are increasingly interested in textile products with enhanced durability: around 90% of consumers
7083 think that apparel should be made to last longer (European Commission, 2019). There are consumers in
7084 different age groups and markets who consider durability, in connection with quality, when making fashion
7085 purchases, even if sustainability is not their main motivation (Goworek et al., 2020).

7086 Durability has been highlighted as one of the top three aspects to influence the decision to purchase apparel
7087 such as coats or jackets (Consumers, Health, Agriculture and Food Executive Agency. et al., 2018). Around 43%
7088 of consumers in some Member States express a willingness to buy long-lasting apparel despite the price (AK
7089 Wienn and Greenpeace, 2023b).

7090 It is also worth noting that design for physical durability involves the development and testing of yarns, fabrics
7091 and textile apparel to meet specified performance standards that can withstand prolonged wear (Claxton and
7092 Kent, 2020b), which could have an effect on product purchase price.

7093 Qualitative assessment of relevance

7094 Based on the above, durability is considered a relevant product aspect in the context of textile apparel.

7095 10.9.1.2 Reliability

7096 Reliability is the probability that a product functions as required under given conditions for a given duration
7097 without an occurrence which results in a primary or secondary function of the product no longer being
7098 performed.

7099 In the context of textile apparel, reliability can be understood as the ability of a product to retain the physical
7100 characteristics that allow its use. Therefore, reliability is directly linked with the intrinsic durability of products.
7101 Ensuring that textile apparel are durable inherently makes them more reliable. Reliability of textile apparel can
7102 be interpreted as the ability of a product to avoid or delay damages related with colour fading, discolouring,
7103 pilling, wear and tear, dimensional stability or seam defects, among others.

7104 Characteristics of the products in the scope

7105 Most of the rationale provided for durability in section 10.9.1.1 is applicable for reliability. There is room for
7106 improvement in the reliability of textile apparel: many products in the market have lifetimes that would
7107 generally be considered satisfactory, whereas in other products, lifetime is unduly short due to inadequate
7108 performance. The choice of fibres and the way they are processed can have an influence on the reliability of
7109 products: for instance, in the manufacturing of denim products, the utilization of synthetic fibres, linen and
7110 hemp -rather than 100% cotton- can help to produce denim products with higher tensile and abrasion resistance
7111 (Elmogahzy, 2020). It must be noted that, on occasions this can affect negatively the recyclability of the product.
7112 As in the case of durability, even though priority parts are not the main cause for physical failures, they may
7113 also have a relevance in product reliability.

7114 Environment

7115 Enhancing the reliability of textile apparel can contribute to lifetime extension. Textile lifespan extension is
7116 essential to avoid virgin natural resources withdrawals, either energy or material technologies (Amicarelli et al.,
7117 2022). Moreover, it can be concluded that the longer the products are in active use by consumers, the more
7118 likely it is to offset the manufacturing of new products, thus reducing the industry's impacts related to energy.

7119 Socioeconomic

7120 Reliability in the context of textile apparel is not aligned with business models based on fast trend turnovers
7121 and short production times. As a textile apparel manufacturer expressed it in (Goworek et al., 2020), "product
7122 longevity loses sales". Therefore, enhancing the reliability of products may affect negatively those
7123 manufacturers whose strategy is based on fast trend turnovers and short production times; whereas it could
7124 affect positively manufacturers which are already focusing on the reliability of products.

7125 An increase in the durability of textile apparel could stimulate the establishment of other product-related
7126 businesses. For instance, products with enhanced reliability seem one of the necessary conditions for the
7127 existence of businesses based on product renting or sharing (a more reliable product is more likely to withstand
7128 the more intensive use within such business models). Quality considered as durability is a crucial aspect of
7129 textile apparel in the second hand markets, which enable extending the textile apparel use times after the initial
7130 user (Aakko and Niinimäki, 2021).

7131 As in the case of durability, whereas any changes in product manufacturing to enhance the reliability of products
7132 would mostly take place outside the EU (Section 5.1), the effects related with renting and sharing services would
7133 be experienced within the EU.

7134 Most of the rationale provided for durability in section 10.9.1.1 is applicable for reliability. Around 90% of
7135 consumers think that apparel should be made to last longer (European Commission, 2019), therefore would be
7136 interested in more reliable products.

7137 Qualitative assessment of relevance

7138 Based on the above, reliability is considered a relevant product aspect in the context of textile apparel.

7139 10.9.1.3 Reusability

7140 Reusability is the ability of a product or component that is not waste to be used again for the same purpose for
7141 which it was conceived.

7142 In the context of textile apparel, reusability can have different interpretations. For instance, it can refer to
7143 extending the lifetime of products (for instance via repair) so that the same owner can continue using the
7144 product. It can also refer to transferring products to a new owner via donating to charity or second hand shops,
7145 renting, inheriting, trading, swapping and borrowing (Shirvanimoghaddam et al., 2020).

7146 Characteristics of the products in the scope

7147 Reusability and durability are also intertwined (as it happened between reliability and durability). Enhancing the
7148 performance of textile apparel increases durability, and thus enables increased use times (Aakko and Niinimäki,
7149 2021).

7150 There is a great potential to further increase reuse, as clothing items typically are disposed of long before the
7151 end of their technical service life (Sandin and Peters, 2018). Many products in the market have lifetimes that
7152 would generally be considered satisfactory, whereas in other products, lifetime is unduly short due to
7153 inadequate performances. As stated for reliability, the choice of fibres and the way they are processed can have
7154 an influence on the reusability of products: textile apparel with higher tensile and abrasion resistance are more
7155 likely to be reused. As in the case of durability, even though priority parts are not the main cause for physical
7156 failures, they may also have a relevance in product reusability.

7157 An aspect related with textile product reusability is the discrepancy between technical lifetime (how long the
7158 product is designed to last) and average real use time by consumers. In Section 5.8, it has been highlighted that
7159 textile products nowadays remain in use for shorter periods, with an ever decreasing trend (some authors
7160 estimate that t-shirts are used for an average of 22 days in total). It appears that many textile products are
7161 currently underused during their initial lifetime, it can be expected that reusability strategies can counteract the
7162 negative effects of this product underuse.

7163 Environment

7164 Enhancing the reusability of textile apparel can contribute to lifetime extension, which is essential to avoid virgin
7165 natural resources withdrawals (Amicarelli et al., 2022). Moreover, it can be concluded that the longer the
7166 products are in active use by consumers, the more likely it is to offset the manufacturing of new products, thus
7167 reducing the industry's impacts related with energy. If the average life of textile apparel is extended by 3 years
7168 (for instance, via reuse), the carbon and water footprint and waste generation can be reduced by 5-10%
7169 (Shirvanimoghaddam et al., 2020).

7170 Socioeconomic

7171 Reusability in the context of textile apparel is also in opposition with business models based on fast trend
7172 turnovers and short production times. Therefore, enhancing the reusability of products may affect negatively
7173 those manufacturers whose strategy is based on such business models; whereas it could affect positively
7174 manufacturers which are already focusing on the reusability of products (some companies claim that their
7175 products are not designed or made for use by only one user, but many users (Piippo et al., 2022b)).

7176 Textile apparel reuse has been related with collaborative consumption. Increase product reuse could boost
7177 product-service systems, commercial sharing systems and access-based consumption (Shirvanimoghaddam et
7178 al., 2020). These business models can contribute to intensifying their use and reducing the purchase of new
7179 items. In this context, the relationship between performances and durability arises again: high technical
7180 performance enables textile apparel to be used for a longer time and enables further uses through, for example,
7181 renting, leasing and second-hand markets (Piippo et al., 2022b). However, it must be noted that, although reuse

7182 of textile apparel takes place today, supply exceeds demand and many wearable items end up either exported
7183 (Cooper and Claxton, 2022c) or in landfills (Goworek et al., 2020).

7184 Reusability can also be associated with take-back services and second-hand shops. In such schemes, companies
7185 maintain and sell the products again, enabling a new life for the product with a new consumer (Piippo et al.,
7186 2022b).

7187 For some consumers, buying high-quality second-hand clothes (in other words, reusing textile apparel)
7188 represents ethical consumption, since it enables prolonging the lifespan of existing products and avoiding the
7189 traditional fashion production chain (Aakko and Niinimäki, 2021). Moreover, in section 6.2.5 it has been
7190 mentioned that second-hand textile apparel are experiencing fast growth. Around 37% of the population
7191 actively engages in buying second-hand apparel (D&B, 2020b). It must be noted, however, that reusability does
7192 not change overconsumption and overproduction patterns.

7193 Qualitative assessment of relevance

7194 Based on the above, reusability is considered a relevant product aspect in the context of textile apparel.

7195 10.9.1.4 Upgradability

7196 Upgradability is the ability of a product to be accessible for implementing actions to enhance its functionality,
7197 performance, capacity, safety or aesthetics of a product.

7198 In the context of textile apparel, upgradability can also be considered a factor that contributes to the overall
7199 durability of a product. An item of textile apparel that is upgradeable will have more chances to extend its
7200 lifetime, and therefore be more durable.

7201 Characteristics of the products in the scope

7202 An upgradeable item of textile apparel may be one with modular components –such as detachable or
7203 interchangeable parts- that allow for updates and style changes without replacing the entire item. Although
7204 some upgradeable products and designs may exist today, these type of modular designs are innovative, but not
7205 yet part of the mainstream market. Despite this lower relevance in the market today, upgradability is one of
7206 the possible strategies that can contribute to product lifetime extension. Upgradability is mostly associated with
7207 products made of physically durable fabrics.

7208 Environment

7209 Possibly due to the lower relevance in the market today, the authors have not found any study that highlights
7210 the potential environmental benefits of increasing the upgradability of textile products. In any case, if it is
7211 assumed that upgradability can contribute to extend the lifetime of textile apparel, it could also be concluded
7212 that upgrading products may have environmental benefits similar to the ones reported in section 10.9.1.1 on
7213 durability.

7214 Socioeconomic

7215 Although upgradeable textile products can still be considered to be a niche in the market today, it can be
7216 concluded that they are also in opposition to business models based on fast trend turnovers and short
7217 production times. Modular products that can be upgraded will last longer and therefore prevent the sales of
7218 new products. Therefore, promoting the upgradability of products may affect negatively those manufacturers
7219 whose strategy is based on such business models; whereas it could affect positively manufacturers which focus
7220 on their upgradability.

7221 There is currently no evidence that suggests that increasing the upgradability of products may stimulate the
7222 creation of alternative business models based on renting or sharing. It could contribute to the creation of jobs
7223 on the clothing repair sector, which could undertake some of the activities related with product upgrade that
7224 cannot be carried out by consumers (replacing older by upgraded modules, for instance).

7225 Possibly due to the lower relevance in the market today, the authors have not found any evidence on the
7226 willingness of consumers to purchase upgradeable textile products. The price to upgrade a product, compared
7227 with the price of a new product, may also be a factor for the willingness of consumers to upgrade textile apparel.

7228 Qualitative assessment of relevance

7229 Based on the above, upgradability is considered a relevant product aspect in the context of textile apparel.

7230 10.9.1.5 Repairability

7231 Repairability is the ability of a defective product or waste object to return to a condition where it fulfils its
7232 intended use. In the context of textile apparel, repairability is directly linked with durability. One of the factors
7233 that makes a product more durable is its potential to be repaired. Repair makes it possible to increase product
7234 lifespans as well as value creation (Laitala and Klepp, 2021b). Either as an activity carried out by the consumer
7235 or as a service provided by a company, repair is another way in which to extend use-time of textile apparel
7236 (Piippo et al., 2022b).

7237 Characteristics of the products in the scope

7238 The repairability of textile apparel can be influenced at the design stage, for instance, considering their ease of
7239 disassembly, ensuring that products can be taken apart to replace worn or damaged components (Cooper and
7240 Claxton, 2022c).

7241 The presence of priority parts has been mentioned in previous sections on durability and reliability. Priority parts
7242 are particularly relevant for repairability, since these are the components with the highest frequency of failure
7243 and functional relevance. In the case of textile apparel, a possible list of priority parts (non-exhaustive)
7244 comprises fabrics, zips, buttons and embellishments such as sequins, gems and beads. It is worth noting that
7245 relatively few pieces of textile apparel with these components have failures, which suggests that the relevance
7246 of repairability is lower than, for instance, the relevance of reliability. Missing buttons and broken zips are the
7247 main problems, followed by missing embellishments (Cooper and Claxton, 2022c).

7248 Environment

7249 Repair of textile apparel has environmental benefits. As highlighted in (Luo et al., 2023c), the frequent use of a
7250 product will cause wear and tear and shorten its service life, while the repair process will extend the service life
7251 of the product and consequently reduce the purchase of new products and excessive waste of resources. It
7252 must be noted that providing spare parts for repairability increases the environmental impact of the product, if
7253 such parts are finally not used.

7254 Socioeconomic

7255 Currently, the professional services used for repair of clothing are companies mostly independent of the
7256 production and sales of clothes (Laitala and Klepp, 2021b). A rise in the availability of more repairable clothing
7257 could stimulate the creation of business related with clothing repair.

7258 Repair could also be stimulated by the same product manufacturers, either providing clothing repair as a service,
7259 or providing information to consumers on how to carry out simple repairs. Some brands offer more service-
7260 oriented solutions, such as repair and alterations, while others are designing modular or more adaptable clothing
7261 (Goworek et al., 2020).

7262 In fact, the number of repairs conducted privately is at least three times more frequent than professional
7263 repairs, since minor mending of textiles often only requires needle and thread, a limited amount of time and
7264 only rather basic skills (Laitala and Klepp, 2021b).

7265 Repair of clothing carried out by consumers is diminishing, due to the current low skills of consumers, influenced
7266 by the scarcity of available time to carry out repairs, the lack of appropriate equipment and price (Finnish
7267 Ministry of the Environment, 2023b). Therefore, only 11% of consumers consider repairability to be important
7268 when purchasing apparel items such as coats and jackets (Consumers, Health, Agriculture and Food Executive
7269 Agency. et al., 2018).

7270 The price of repair is a fundamental factor in the case of textile apparel. The price of repairing clothes depends
7271 a lot on the type of textile apparel and repair needed. A general trend observed is that consumers are not willing
7272 to pay much for the repair of textile apparel, and especially not for low-priced textile apparel. Consumers
7273 compare the price to a new textile apparel, which often is the same or even lower than repair or adjustments
7274 done by the tailor (Laitala and Klepp, 2021b). The authors have not found specific data regarding the willingness
7275 of consumers to pay for the repair of textile apparel. Using as a reference values from other product groups,
7276 the willingness to pay for repairs of small electronics is between 20% and 40% of the replacement cost
7277 (Cordella, Sanfeliix, et al., 2019; Svensson-Hoglund et al., 2021).

7278 In essence, clothes would be worn longer if repair services were cheaper (or products more expensive): 27% of
7279 consumers agree that they would wear their textile apparel longer if they were better at repairing them (Laitala
7280 and Klepp, 2021b). For those few consumers that do carry out repairs, it is worth noting that textile apparel has
7281 a much higher share of successful repairs than other products such as electrical appliances.

7282 Qualitative assessment of relevance

7283 Based on the above, repairability is considered a relevant product aspect in the context of textile apparel.

7284 10.9.1.6 Possibility of maintenance

7285 The possibility of maintenance is the ability of a product to be kept in a condition where it is able to fulfil its
7286 intended purpose through one or more actions. In the context of textile apparel, it consists of the set of activities
7287 that a consumer carries out, fundamentally during the use phase of the product, in order to maintain it in a
7288 condition that satisfies all their needs associated to the product. This can include activities such as washing,
7289 drying, ironing, folding, storing, wearing in specific environments and conditions, etc.

7290 Characteristics of the products in the scope

7291 Washing is potentially the most relevant maintenance activity for textile apparel, which are prone to getting
7292 dirty or soiled. The ability to remove dirt and stains can be influenced by design, for instance by the choice of
7293 materials. Inherent fibre properties affect the soiling characteristics of textile apparel. Cotton gets dirty easily,
7294 but can be washed efficiently and thus cleaned. In contrast, wool resists staining and develops less odour, but
7295 stains are difficult to remove (Laitala and Klepp, 2018b). Similar trade-offs can be expected for other
7296 maintenance activities such as drying or ironing.

7297 Environment

7298 Textile apparel maintenance activities, because they are repeated often and by all people in the world,
7299 constitutes a significant environmental impact. Washing, drying and wrinkle removal are repeated on a regular
7300 basis. The longer an item of textile apparel is used, the more important this phase will be for the overall
7301 environmental impact of the textile apparel (Laitala and Klepp, 2018b).

7302 Maintenance can contribute to extend the lifetime of products and therefore reduce their environmental impact.
7303 It is important for keeping products in use and for motivating consumers to repair them when needed (Laitala
7304 and Klepp, 2021b). Extending textile apparel lifetimes should also take into account how more durable textile
7305 apparel items can be cared for sustainably by consumers, for example by avoiding dry-clean only fabrics
7306 (Goworek, Lynn Oxborrow, et al., 2020).

7307 Socioeconomic

7308 Manufacturers of textile apparel emphasize that optimal care and maintenance is a significant factor for
7309 extending product life. For them, it is important to determine which products customers need, but also how they
7310 use and care for these products. Since it is often the customers who care for the products, it is important for
7311 companies to share information on correct maintenance (Piippo et al., 2022b).

7312 The possibility of maintenance can also be a factor in take-back services. In such schemes, companies maintain
7313 the products they sold, in order to sell them again, enabling a new life for the product with a new consumer
7314 (Piippo et al., 2022b).

7315 Similarly to previous product aspects, the possibility of maintenance is in opposition with business models based
7316 on fast trend turnovers and short production times. A product which is easier to be maintained will delay the
7317 sale of new products, delaying their replacement. Therefore, promoting the possibility of maintenance of
7318 products may affect negatively those manufacturers whose strategy is based on such business models;
7319 whereas it could affect positively manufacturers which focus on product maintenance.

7320 Maintenance of textile products relies mostly on users. Most of the laundering and storing of textiles is carried
7321 out by the owner of the apparel. Manufacturers already provide maintenance instructions to users on how to
7322 wash and take care of textile products, on a voluntary basis. As pointed out in Section 6.3.2, a significant
7323 percentage of users follow these care instructions, but the adherence diminishes after the initial wash.

7324 Qualitative assessment of relevance

7325 Based on the above, possibility of maintenance is considered a relevant product aspect in the context of textile
7326 apparel.

7327 10.9.1.7 Possibility of refurbishment

7328 The possibility of refurbishment is the ability of a product or a discarded product to be prepared, cleaned, tested,
7329 serviced and, where necessary repaired to restore its performance or functionality within the intended use and
7330 range of performance originally conceived at the design stage at the time of the placing of the product on the

7331 market. In the context of textile apparel, it can be interpreted as a very similar –or equivalent– aspect to
7332 repairability. In essence, when a product is repaired, it may also follow the steps described in the definition of
7333 possibility of refurbishment (preparing, cleaning, testing, servicing and repairing). As in the case of repair, the
7334 possibility of refurbishing is directly linked with durability.

7335 Characteristics of the products in the scope

7336 As in the case of repairability, the possibility of refurbishing of textile apparel can be influenced at the design
7337 stage, for instance, considering their ease of disassembly, ensuring that products can be taken apart to replace
7338 worn or damaged components (Claxton and Kent, 2020). The presence of priority parts has been mentioned in
7339 previous sections on durability, reliability and repairability. Priority parts are also particularly relevant for the
7340 possibility of refurbishing, since these are the components with the highest frequency of failure and functional
7341 relevance, and therefore the parts which more likely may need to be substituted in a potential refurbishing
7342 activity. Refurbishment is strictly connected to the physical durability of priority parts and the price related to
7343 refurbish a used product or waste rather than manufacturing a new one.

7344 Environment

7345 Possibly due to the similarities with product repair, the authors have not found scientific literature highlighting
7346 the potential environmental benefits of textile apparel refurbishing.

7347 Socioeconomic

7348 Similarly to the case of previous product aspects, the possibility of refurbishment is in contrast with the business
7349 models based on fast trend turnovers and short production times. A product that can be refurbished will reduce
7350 the opportunity of selling new items. Therefore, promoting the possibility of maintenance and refurbishment of
7351 products may affect negatively those manufacturers whose strategy is based on such business models;
7352 whereas it could affect positively manufacturers which focus on product maintenance and refurbishment.

7353 A rise in the availability of products which are easier to be refurbished could stimulate the creation of business
7354 related with textile apparel repair.

7355 Qualitative assessment of relevance

7356 Based on the above, possibility of refurbishment is considered a relevant product aspect in the context of textile
7357 apparel.

7358 10.9.1.8 Presence of substances of concern

7359 The presence of substances of concern should be understood as the existence of chemicals in products that for
7360 reasons of their intrinsic hazards pose risks to human health or the environment, or that otherwise negatively
7361 affects the reuse and recycling of materials in the product in which they are present. This may bring about the
7362 need to consider regulatory action, improved management and/or substitution with safer alternatives, whenever
7363 feasible. ESPR specifically requires to track the presence of these substances in products.

7364 In ESPR, a substance of concern means a substance that:

7365 (a) meets the criteria laid down in Article 57 of Regulation (EC) No 1907/2006 and is identified
7366 in accordance with Article 59(1) of that Regulation;

7367 (b) is classified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 in one of the following
7368 hazard classes or hazard categories:

7369 i. carcinogenicity categories 1 and 2;

7370 ii. germ cell mutagenicity categories 1 and 2;

7371 iii. reproductive toxicity categories 1 and 2;

7372 iv. endocrine disruption for human health categories 1 and 2;

7373 v. endocrine disruption for the environment categories 1 and 2;

7374 vi. persistent, mobile and toxic or very persistent, very mobile properties;

7375 vii. persistent, bioaccumulative and toxic or very persistent, very bioaccumulative
7376 properties;

7377 viii. respiratory sensitisation category 1;

- 7378 ix. skin sensitisation category 1;
- 7379 x. hazardous to the aquatic environment — categories chronic 1 to 4;
- 7380 xi. hazardous to the ozone layer;
- 7381 xii. specific target organ toxicity — repeated exposure categories 1 and 2;
- 7382 xiii. specific target organ toxicity — single exposure categories 1 and 2;
- 7383 (c) is regulated under Regulation (EU) 2019/1021; or
- 7384 (d) negatively affects the reuse and recycling of materials in the product in which it is present;

7385 Characteristics of the products in the scope

7386 As already pointed out in Section 3.3.2, the raw materials extraction and manufacturing of textile apparel involve
 7387 the use of a wide variety of chemical substances and mixtures, which includes pesticides, solvents, surfactants,
 7388 dyes, pigments, stain repellents, flame retardants or biocides, among others, as well as water. The demand of
 7389 chemical compounds by the textile industry is estimated to use around 25% of global chemical production (Raj
 7390 et al., 2022). Many of the chemicals used during textile manufacturing are associated with spinning and weaving
 7391 and wet processing. A single European textile-finishing company uses over 466 g of chemicals per 1 kg of
 7392 textile (Niinimäki et al., 2020).

7393 Chemicals are used in the manufacturing of textile apparel with a specific purpose, such as providing a certain
 7394 level of resistance to abrasion, adding colour, waterproofing, etc. The presence of substances of concern can be
 7395 influenced at the design stage, via substitutions by safer alternatives (often with trade-offs) (Zhang and Hale,
 7396 2022).

7397 Environment

7398 Chemicals have an influence in almost all lifecycle stages of a textile product. Chemicals used during
 7399 manufacturing are often discharged or results in releases and get in direct contact with soil and water bodies.
 7400 Consumers are directly exposed to chemicals in the textile during the use phase. Chemicals may also have an
 7401 influence at end-of-life, either hindering processes such as recycling or being released to the environment if
 7402 apparel is landfilled or incinerated.

7403 Eliminating or reducing the presence of substances of concern has been highlighted as one of the key areas
 7404 with potential of improvement regarding ecodesign (Ellen MacArthur Foundation, 2017; Bauer, Watson, Gylling,
 7405 Remmen, Lysemose, Catharina Hohenthal, et al., 2018; Niinimäki et al., 2020). For instance, natural cotton fabric
 7406 dyeing using dyes of plant origin (white onion) can reduce the impacts on human health and ecosystems
 7407 (Amicarelli et al., 2022).

7408 Socioeconomic

7409 Companies in the textile apparel sector aim to reduce production costs through manufacturing in locations with
 7410 lower production costs and where often environmental regulation is laxer or pollution-mitigating technologies
 7411 are not legally required. This approach to manufacturing often leads not only to high environmental impacts
 7412 from use of chemicals but increased health risks for factory workers, cotton farmers and fashion consumers
 7413 (Niinimäki et al., 2020).

7414 Despite being in direct contact with chemicals when wearing apparel, 60% of respondents to a survey in the EU
 7415 perceived chemicals in apparel fabrics as representing a minimal risk (European Commission, 2019).

7416 Qualitative assessment of relevance

7417 Based on the above, presence of substances of concern is considered a relevant product aspect in the context
 7418 of textile apparel.

7419 10.9.1.9 Energy use and energy efficiency

7420 Energy use can be defined as the total use of energy in all lifecycle stages of a product. Energy efficiency is
 7421 the ratio of output of performance, service, goods or energy to input of energy.

7422 Characteristics of the products in the scope

7423 Almost all life-cycle stages of apparel have significant energy consumption, particularly the extraction of fibres
 7424 such as silk; production processes such as spinning, knitting and weaving; or thermal treatments during
 7425 production (see Section 3.3.1). Although manufacturing covers about 70-80% of total lifecycle energy

7426 consumption (Sandin, Roos, Spak, et al., 2019; Quantis, 2021), energy is also consumed in the use phase for
7427 laundering, ironing and drying.

7428 There is a wide range of materials available for manufacturers, with different performance in terms of energy
7429 use and energy efficiency. Considering the manufacturing stage, some fibres are less energy intensive than
7430 others. However, reductions in energy use may come with trade-offs in other properties of the fibre (Niinimäki
7431 et al., 2020).

7432 Considering the use phase, the electricity consumed during domestic washing amounts to 2% of household
7433 usage, while tumble drying accounts for 4.5% (Zhang et al., 2022). There are also examples of energy efficiency
7434 improvement potential areas in the use phase, described in (Zhang et al., 2022). For instance, products made
7435 from hygroscopic fibres require higher energy in tumble drying than their hydrophobic fast-drying synthetic
7436 counterparts (Zhang et al., 2022). Reductions in the number of launderings can also be achieved by
7437 manufacturing clothes with odour reduction thanks to fabrics enabled with silver, which has antimicrobial
7438 properties (Amicarelli et al., 2022). Some fibres require lower temperatures for laundering than others (less
7439 energy use). Some materials require ironing to achieve a minimum aesthetic performance, whereas others do
7440 not need to be ironed. However, different fibres will provide different performance and aesthetics. Design
7441 strategies tend to be aimed at reducing rather than eliminating the negative impacts of the use phase, typically
7442 in the design of clothes for less frequent washing and use of lower laundering temperatures to prolong textile
7443 apparel life (Claxton and Kent, 2020b)

7444 There is room for improvement in the energy efficiency of textiles manufacturing as well. In (Zhang et al., 2022),
7445 several examples are provided: low-twist spinning technology introduces false twist between the front roller
7446 and the yarn guide, and can achieve a twist reduction of 20-40%; significant energy saving in air humidification
7447 can be achieved by using energy-efficient nozzles and variable-frequency drives based on the real-time
7448 humidity conditions in the spinning and weaving process; or high-volume, low-pressure nozzles can save up to
7449 26% of energy thanks to their optimized nozzle geometry (Zhang et al., 2022). In the case of denim apparel,
7450 the industry is transitioning from stonewashed denim to more energy-efficient methods such as enzyme
7451 treatment, mechanical abrasion, ozone fading, water jet fading and laser treatment (Elmogahzy, 2020). It is
7452 worth noting that, in the context of the Industrial Emissions Directive, the Reference Document for the Textiles
7453 Industry (Roth et al., 2023) addresses energy use for installations located in the EU and points out the Best
7454 Available Techniques.

7455 Environmental

7456 As pointed out in Section 5.4.3, considering the manufacturing stage, the energy consumption in the global
7457 textile industry was estimated to be 2% of the global energy consumption. Section 3.3.1 reports that almost all
7458 stages of the textile apparel value chain are energy demanding. Indirectly related with energy, the apparel
7459 industry is reported to be responsible for about 6.5% of global GHG emissions (Niinimäki et al., 2020).

7460 The substantial consumption of electricity in the use stage of textiles was also revealed to have a significant
7461 impact on the environment due to repeated use and care operations, in some cases even exceeding the
7462 contribution of the production stage (Luo et al., 2023c).

7463 Socioeconomic

7464 As mentioned in Section 5.4.3, the cost of energy plays an important role in the textile industry. In fact, the
7465 increase of the cost of energy in the EU in 2022 negatively affected the EU textile production. Moreover, the
7466 national energy strategies influence the establishment of textile industry focussing on specific stages of the
7467 value chain.

7468 Textile apparel are generally not perceived by consumers as energy-related products. Possibly because of that,
7469 the authors have not found any evidence on the willingness of consumers to purchase energy efficient textile
7470 products.

7471 Users can have an influence on the energy consumed during the lifecycle of apparel, mostly in the laundering,
7472 ironing and drying activities. Following the instructions available in labelling in terms of water temperature can
7473 help to reduce energy consumption. Reducing the frequency of ironing may also save energy. Substituting the
7474 use of tumble driers by air-drying (when possible) can also have a positive effect.

7475 Qualitative assessment of relevance

7476 Based on the above, energy use and energy efficiency is considered a relevant product aspect in the context of
7477 textile apparel.

7478 10.9.1.10 Water use and water efficiency

7479 Water use is the use of water in all lifecycle stages of a product. Water efficiency is the ratio of output of
7480 performance, service, goods to input of water.

7481 Characteristics of the products in the scope

7482 Apparel manufacturing requires enormous volumes of water in fabric production (Jia et al., 2020). Typically,
7483 70-250 l of water are used for every kilogram of finished textiles (Zhang et al., 2022). Water is also consumed
7484 during the use phase in laundering activities.

7485 There is a wide range of materials available for manufacturers, with different performance in terms of water
7486 use and water efficiency. Cotton and hemp are the most water-demanding among textile fibres, whereas
7487 polyester and polypropylene need the least amount of water. However, reductions in water use may come with
7488 trade-offs in other properties of the fibre (Niinimäki et al., 2020).

7489 There is room for improvement in the water efficiency of textiles manufacturing. In (Zhang et al., 2022), several
7490 examples are provided: a foam-laying technique has been studied as a replacement for the wet-laying non-
7491 woven process, using 20% of the water and saving energy simultaneously; for synthetic fibres, colourless
7492 polymers can be structurally coloured with nano-sized pigment inclusions via spin dyeing, achieving 50% water
7493 savings; recycling wastewater generated from spent dyeing and rinsing baths through catalytic ozonation with
7494 carbon aerogel is a method to minimize water consumption.

7495 There are also examples of water efficiency improvement potential areas in the use phase (for laundering),
7496 described in (Zhang et al., 2022). For instance, products made from hygroscopic fibres require more water than
7497 their hydrophobic fast-drying synthetic counterparts. It is worth noting that, in the context of the Industrial
7498 Emissions Directive, the Reference Document for the Textiles Industry (Roth et al., 2023) addresses water use
7499 for installations located in the EU and points out the Best Available Techniques.

7500 Environmental

7501 Considering the initial stages of textile apparel production, water consumption for materials extraction and
7502 manufacturing is estimated to account for 4% of global freshwater extraction (Ellen MacArthur Foundation,
7503 2017). Just cotton is estimated to account for 2.5% of water consumed globally every year (Amicarelli et al.,
7504 2022). In the EU, the production of textile apparel, footwear and household textiles purchased in 2020 was
7505 around 4 000 million m³ of blue water⁽²¹⁴⁾.

7506 Considering the use stage of textile apparel, the substantial consumption of water in the use stage of textiles
7507 was revealed to have a significant impact on the environment due to repeated use and care operations, in some
7508 cases even exceeding the contribution of the production stage (Luo et al., 2023c).

7509 Socioeconomic

7510 As described in Section 5.7, the global value chain of textile apparel causes most of its environmental impacts
7511 in the production stages, and most of these stages occur outside of the EU. In particular, in countries that allow
7512 production at lower costs (due to poor labour conditions and less stringent measures on environmental
7513 protection). This is particularly relevant for water consumption, an aspect which is directly related with the
7514 specific location. For instance, cotton has the highest water footprint of any fashion fibre (Niinimäki et al., 2020).
7515 For making a cotton t-shirt, 2 700 litres of water are used (Shirvanimoghaddam et al., 2020).

7516 Textile apparel are generally not perceived by consumers as water-related products. Possibly because of that,
7517 the authors have not found any evidence on the willingness of consumers to purchase water efficient textile
7518 products. However, water is also consumed during the use phase in laundering activities, which are mostly
7519 influenced by the users. As highlighted in previous sections, different washing habits are observed across
7520 countries, with factors such as age and societal norms also having an influence. User perceptions about hygiene
7521 and convenience may impact washing frequency, influencing the consumption of water during the use phase.
7522 There is also a relevant interaction with laundry detergents (some of them might require more water than
7523 others to achieve the same level of cleanliness).

7524 Qualitative assessment of relevance

²¹⁴ Blue water refers to fresh surface and groundwater

7525 Based on the above, water use and water efficiency is considered a relevant product aspect in the context of
7526 textile apparel.

7527 10.9.1.11 Resource use and resource efficiency

7528 Resource use is the use of raw materials, mainly abiotic (minerals, metals, fossil fuels), in all lifecycle stages.
7529 It can also include biotic resources such as land, air, ecosystems. The use of natural resources can be accounted
7530 for as the volumes of resources consumed (materials) or used (land, air, ecosystems), or the impacts derived
7531 from the use of resources. Water and energy are not considered within resources under the scope of ESPR given
7532 these are addressed as separate product aspects. Resource efficiency is the ratio of output of performance,
7533 service, goods to input of resources, raw materials, air, land, soil and ecosystem services.

7534 Characteristics of the products in the scope

7535 The textile apparel industry is resource-intensive (Piippo et al., 2022b). Most of these resources are consumed
7536 in the raw material extraction and manufacturing stages. This product aspect is therefore related with product
7537 parameters, reported in Annex I to ESPR, such as 'use or content of sustainable renewable materials' and
7538 'reduction of materials consumption', among others.

7539 Considering textile manufacturing, there are a wide variety of techniques, each of them with a different level
7540 of resource efficiency. Taking cotton as an example, it may be produced following organic farming, conventional
7541 farming or regenerative agriculture and using different quantities of land, water, chemicals and energy
7542 according to the climate and the ecosystem where it is cultivated. Each specific cultivation practice in a given
7543 location has a specific crop yield (or efficiency in the use of resources). Similarly, manmade cellulosic fibres can
7544 be produced using cellulose from recycled wood, agricultural waste, virgin wood coming from sustainably
7545 managed forests, virgin wood coming from deforestation-free forests or from unknown sources, etc. All these
7546 options use different resources and affect different ecosystems.

7547 Resource efficiency can also be linked with the process of reducing the weight of products to improve their
7548 environmental performance. This practice, aimed at decreasing material use throughout the product lifecycle,
7549 it is also known as lightweighting. Denim fabrics, for instance, can be made in many weights. Light denim will
7550 be suitable for dresses or shirts where drape, softness and flexibility are required. Heavy denims are typically
7551 used for blue jeans trousers and skirts (Elmogahzy, 2020). Although light weights use less material, they also
7552 provide different properties to textile apparel. Heavier weight fabrics are generally more durable and less
7553 susceptible to abrasion and wear, while fabrics with a tighter, more compact construction are also more
7554 resistant to damage (Cooper and Claxton, 2022c). Therefore, the authors consider that lightweighting is not a
7555 relevant product parameter for textile apparel.

7556 Environmental

7557 The textile industry is the fifth industrial sector for primary use of materials, mainly related to the extensive
7558 production of natural origin fibres and man-made cellulosic fibres. The estimates of textile fibre production
7559 were around 116-124 million tonnes in 2022 (Textile Exchange, 2022b).

7560 Socioeconomic

7561 Similarly to energy efficiency and water efficiency, resource efficiency does not appear to be a relevant aspect
7562 influencing the behaviour of consumers when purchasing textile apparel.

7563 Qualitative assessment of relevance

7564 Based on the above, resource use and resource efficiency is considered a relevant product aspect in the context
7565 of textile apparel.

7566 10.9.1.12 Recycled content

7567 Recycled content is the proportion, by mass, of recycled material, from pre- and post-consumer waste, in a
7568 product or packaging. In the case of textile apparel, it is generally expressed with reference to the amount of
7569 fibres, which are at least 80% of the weight of the product.

7570 Characteristics of the products in the scope

7571 The possibility to use recycled material in textile apparel has been mentioned in some studies as a relevant
7572 product aspect to consider (Ellen MacArthur Foundation, 2017; Bauer, Watson, Gylling, Remmen, Lysemose,
7573 Catharina Hohenthal, et al., 2018; Niinimäki et al., 2020).

7574 When considering the possibility of having recycled content in a product, a key aspect is the availability of
7575 recycled material in the market. In the case of textile apparel, as pointed out in Section 3.3.2, there is enough
7576 post-consumer waste from which material could be recycled and reintroduced in the manufacturing process of
7577 textile apparel. In Section 5.4.1, it has also been mentioned that a 30% increase in textile waste is expected for
7578 2030-2035, so the supply of feedstock for recycled material seems guaranteed for the coming years.

7579 However, when designing a product with recycled content it must be taken into account that, depending on the
7580 recycling technology, recycled fibres tend to be of lower performance than their virgin equivalents and are
7581 normally limited to single fibre content fabrics (Claxton and Kent, 2020b). For instance, a maximum of 20%
7582 post-consumer mechanically recovered cotton fibres can be blended with virgin cotton before strength is
7583 compromised (Niinimäki et al., 2020).

7584 There is room for improvement to increase the recycled content in textile apparel. For instance, chemical
7585 recycling works by breaking down fibres through a chemical dissolution process to the level of a polymer and
7586 is suitable for cellulose fibres. The process preserves fibres better than the mechanical recycling and is,
7587 therefore, anticipated to enable textile apparel to be produced with higher percentages of recycled fibres
7588 (Niinimäki et al., 2020).

7589 Environmental

7590 Some studies highlight that the use of recycled materials in textile apparel reduces their environmental impact.
7591 For instance, by using recycled cotton for spinning it is possible to decrease 60% of the emitted CO₂eq, reduce
7592 the consumption of oil equivalent by 11% and water by almost 80%. Similarly, the use of recycled cotton fibre
7593 has a huge potential to reduce environmental impacts, since it is possible to avoid the production of virgin
7594 cotton, with a reduction of up to 98% in water use. Substituting primary by secondary materials in a polyester
7595 jacket shows a reduction in impacts between 50%-80% in the categories of photochemical smog formation,
7596 human toxicity and water scarcity (Amicarelli et al., 2022).

7597 Socioeconomic

7598 Increasing the content of recycled material in textile apparel could contribute to job creation in different areas.
7599 For instance, in the collection and sorting of textiles, as well as in transport and recycling operations. The
7600 increase in recycled content might also incentivise the recycling of end-of-life waste material.

7601 In contrast with other aspects such as durability or repairability, consumers give little importance to the use of
7602 recycled materials in apparel (11%, as highlighted in Section 6.2.7).

7603 Qualitative assessment of relevance

7604 Based on the above, recycled content is considered a relevant product aspect in the context of textile apparel.

7605 10.9.1.13 Possibility of remanufacturing

7606 The possibility of remanufacturing is the possibility of producing through actions a new product from objects
7607 that are waste, products or components and through which at least one change is made that may affect the
7608 performance, purpose or type of the product.

7609 In the context of textile apparel, it must be noted that product attributes that make it fit for repair (such as
7610 ease of disassembly) also make it fit for remanufacturing.

7611 Characteristics of the products in the scope

7612 As in the case of repairability, the possibility of remanufacturing of textile apparel can be influenced in the
7613 design stage, for instance, considering their ease of disassembly, ensuring that products can be taken apart to
7614 replace worn or damaged components (Claxton and Kent, 2020b).

7615 The presence of priority parts has been mentioned in previous sections on durability, reliability, repairability and
7616 possibility of refurbishing. Priority parts are also particularly relevant for the possibility of remanufacturing,
7617 since these are the components with the highest frequency of failure and functional relevance, and therefore
7618 the parts which more likely may need to be substituted in a potential remanufacturing activity.

7619 Environment

7620 Possibly due to the similarities with product repair, the authors have not found scientific literature highlighting
7621 the potential environmental benefits of textile apparel remanufacturing.

7622 Socioeconomic

7623 Similarly with previous product aspects, the possibility of remanufacturing is in opposition with business models
7624 based on fast trend turnovers and short production times. A product which is easier to be remanufactured will
7625 reduce the opportunity of selling new items. Therefore, promoting the possibility of remanufacturing of products
7626 may affect negatively those manufacturers whose strategy is based on such business models; whereas it could
7627 affect positively manufacturers which focus on product remanufacturing.

7628 A rise in the availability of products which are easier to be remanufactured could stimulate the creation of
7629 business related with textile apparel repair. The cost of remanufacturing may also be a significant factor for
7630 the expansion of this activity.

7631 Qualitative assessment of relevance

7632 Based on the above, possibility of remanufacturing is considered a relevant product aspect in the context of
7633 textile apparel.

7634 10.9.1.14 Recyclability

7635 Recyclability is the ability of waste materials originating from products to be reprocessed into products,
7636 materials or substances whether for the original or other purposes. It includes the reprocessing of organic
7637 material but does not include energy recovery and the reprocessing into materials that are to be used as fuels
7638 or for backfilling operations.

7639 Characteristics of the products in the scope

7640 It is possible to recycle textile apparel, either via mechanical, chemical or enzymatic technologies. However, due
7641 to different fibre material combinations, auxiliaries such as buttons and zippers, and various thermal
7642 treatments, fibre to fibre recycling is a complex and hardly practiced treatment (Eppinger et al., 2022). In fact,
7643 chemical and enzymatic recycling do not seem to be ready for industrial scale application, where the automatic
7644 sorting of collected textile products is crucial to effectively identifying fibre type and determining the
7645 appropriate recycling method (Zhang et al., 2022). Mechanical recycling is therefore the most common recycling
7646 technology nowadays.

7647 Recycling may be closed loop (when materials are recycled back into the same or similar products) or open loop
7648 (when materials are converted into different types of products). In the case of textile apparel, most of the
7649 recycling processes today are open loop. As the length of the fibres and the constituent molecules are reduced
7650 by wear and laundry, fabric and fibre recycling typically yields materials of lower performances than materials
7651 made from virgin fibres (Sandin and Peters, 2018). For instance, materials recycled via mechanical recycling
7652 can be used to produce insulating materials for cars and buildings, fibre-reinforced composites and disposable
7653 non-woven products such as sanitary wipes, napkins and diapers (Zhang et al., 2022). Moreover, there are many
7654 opportunities to use cotton and textile waste for various applications including composites, microbial fuel cell,
7655 potassium-ion exchange, biochar applications, sound absorbents, thermal insulation, EMI shielding, etc.
7656 (Shirvanimoghaddam et al., 2020).

7657 Mechanically recycled fibres generally show weakened properties (Zhang et al., 2022). This process gives the
7658 best results when the material still has some level of performance. If very poor (high wear and tear) material
7659 is mechanically recycled, up to 30-50% of virgin material needs to be added so that the performance of the
7660 material becomes sufficient (Piippo et al., 2022b). This can also be observed in the case of denim products. The
7661 common approach to recycle denim products is through fabric shredding into fibres, which can be used in many
7662 applications. The success will primarily depend on the characteristics of fibres obtained from the recycling
7663 process (Elmogahzy, 2020).

7664 There is room for improvement in the possibilities of recycling textile apparel and this may be influenced at the
7665 design stage. For instance, most apparel products currently in use are fibre blends of multiple polymers.
7666 Recycling is complicated by textile apparel being constructed of fibre blends, which require separation (Niinimäki
7667 et al., 2020). Mono-materiality in textiles has long been recognized for its great recycling efficiency without
7668 need for disassembly, making it one of the most effective design strategies for proactive material recovery and
7669 perhaps the basis for a new textile paradigm (Zhang et al., 2022).

7670 Environmental

7671 Some studies highlight that the use of recycled materials in textile products decreases their environmental
7672 impact (Cai and Choi, 2020; Niinimäki et al., 2020; Amicarelli et al., 2022). The environmental analysis of section
7673 10.9.1.12 on recycled content provides some insight on the benefits of recycling textile apparel. Upcycling textile

7674 waste into new products or even recycling textile waste in another sector (e.g. as part of composite material in
7675 the automotive industry) is an important approach in a circular economy (Piippo et al., 2022b).

7676 Socioeconomic

7677 In Section 5.4.1, a summary was provided in terms of availability of textile recycling plants. Europe, Asia and
7678 North America host 50%, 33% and 11% of global textile recycling plants, respectively. Most of these plants are
7679 able to process textile products made of many textile fibres. Increasing the recyclability in textile products could
7680 contribute to job creation in different areas: textile collection, sorting, transport and recycling.

7681 However, at global level, only 12% of textile materials are currently recycled (Zhang et al., 2022). Only 15% of
7682 post-consumer textile waste was collected separately for recycling purposes in 2015, and less than 1% of total
7683 production was recycled in closed loop. Most of the recycled textiles were recycled into other, lower-value
7684 applications, such as insulation material, wiping cloths and mattress stuffing (Niinimäki et al., 2020).

7685 In Solis et al (2024), the authors investigated the socioeconomic impacts of different waste management
7686 scenarios for textiles. They concluded that mechanical recycling of cotton, polyester, polycotton and polyamide
7687 achieved lower costs than incineration. However, if other recycling pathways (such as mechanical recycling of
7688 viscose, open-loop recycling, chemical recycling of cotton, polyester and polycotton) are to be competitive from
7689 the socio-economic perspective relative to incineration, technology costs need to decrease significantly.

7690 In terms of employment, preparing for reuse and recycling create significantly more jobs than incineration and
7691 landfilling (Solis et al., 2024).

7692 Recyclability does not seem a relevant aspect for consumers when purchasing textile apparel.

7693 It has been mentioned above that fibre blends make the process of recycling more complex. To overcome this,
7694 mono-material apparel and footwear engineered for mechanical recycling may be manufactured from
7695 thermoplastic materials via a combination of existing machinery and processes. However, the huge variation in
7696 consumer preference is not easily satisfied by a single material (Zhang et al., 2022).

7697 The recyclability of textile apparel can also be influenced by increasing their collection at end of life, an aspect
7698 where consumers also have an influence. Moreover, the Waste Framework Directive requires Member States to
7699 set up separate collection for textiles by 1 January 2025. It also promotes the establishment of Extended
7700 Producer Responsibility Schemes for textile products in several Member States.

7701 Qualitative assessment of relevance

7702 Based on the above, recyclability is considered a relevant product aspect in the context of textile apparel.

7703 10.9.1.15 Environmental impacts

7704 Environmental impacts refer to any change to the environment, whether adverse or beneficial, wholly or partially
7705 resulting from a product during its life cycle.

7706 Characteristics of the products in the scope

7707 Textile apparel include a wide variety of products, including t-shirts, shirts and blouses, sweaters, jackets, pants,
7708 dresses and accessories, among others. These products have different applications and therefore a very diverse
7709 range of performance requirements. Related with the variety of products and applications, a wide variety of
7710 possible materials and manufacturing processes arise, each one providing different characteristics to textile
7711 apparel.

7712 This wide variety of possibilities in terms of products, materials and manufacturing processes causes that the
7713 nature of the environmental impacts is also wide. Some materials and processes might have a larger impact
7714 due to energy use and greenhouse gas emissions, whereas other have a larger impact due to water use, resource
7715 use, release of chemicals or generation of waste.

7716 Environmental aspects

7717 As highlighted in Section 3.3.2, textile apparel has relevant effects on the environment throughout its lifecycle,
7718 on different areas. For instance:

7719 — The textile industry's water consumption is estimated to account for 4% of global freshwater
7720 extraction (Ellen MacArthur Foundation, 2017).

- 7721 — In 2004, the energy consumption in the global textile industry was estimated to be equal to 2%
7722 of the global energy consumption. Additionally, the production of 1 kg of generic textile product
7723 was estimated to require about 126 MJ (about 35 kWh) of energy (Muthu, 2015).
- 7724 — Numerous life-cycle stages of textile apparel involve the use of chemical substances and mixtures.
7725 Some of them are pesticides, solvents, surfactants, dyes and pigments, water and stain repellents,
7726 flame retardants, biocides and many more (Ellen MacArthur Foundation, 2017) .
- 7727 — In 2019, the EU generated about 12.6 Mt of textile waste, including post-industrial, pre-consumer
7728 and post-consumer waste, representing 11%, 3% and 86% of the total, respectively.
- 7729 — The European Environment Agency estimated that textile consumption in the EU in 2020 emitted
7730 121 million tonnes of greenhouse gases. Around 75% of the emissions occurred outside Europe,
7731 specifically in Asian countries (EEA et al., 2022).
- 7732 — Textile fragmentation is also a relevant aspect for the environmental impacts of textile apparel. It
7733 has been reported that one of the leading sources of microplastics pollution is the fragmentation
7734 of synthetic textiles (Boucher and Friot, 2017). Current patterns indicate that emissions of
7735 microplastics from textiles are projected to rise by approximately 22% by the year 2030 (DG ENV,
7736 2023).
- 7737 — The BREF on textiles (Roth et al., 2023) identifies and addresses the main pollutants during the
7738 manufacturing process of textile apparel, such as COD, SO_x, NO_x, energy consumption and water
7739 consumption.

7740 Socioeconomic

7741 Many of the impacts mentioned above occur outside the EU. Third countries producing textiles often have less
7742 stringent environmental and labour requirements. This allows manufacturers to reduce costs and offer final
7743 products at a lower purchase price than EU production, at the expense of environmental degradation and health
7744 issues of the workers and the communities working around the manufacturing plants. Promoting products with
7745 a lower environmental impact would contribute to the reduction of impacts across the whole value chain.

7746 As pointed out in Section 6.2.2, most of EU consumers argue that environmental impact of products is 'very' or
7747 'rather important' in their purchasing decisions (European Commission. Directorate General for Environment.,
7748 2023). Information is a key aspect to convey messages on the environmental performance of products: around
7749 82% of consumers believe there is insufficient information available on environmental aspects associated with
7750 apparel (European Commission, 2019).

7751 Qualitative assessment of relevance

7752 Based on the above, environmental impact is considered a relevant product aspect in the context of textile
7753 apparel.

7754 10.9.1.16 Expected generation of waste

7755 The expected generation of waste is the generation of any substance, or object that the holder discards or
7756 intends or is required to discard.

7757 Characteristics of the products in the scope

7758 Waste is generated in different lifecycle stages of textile apparel. Depending on that, waste can be classified
7759 as (Huygens et al., 2023):

- 7760 • Post-industrial waste: waste generated during the manufacturing of textile products and their
7761 precursors.
- 7762 • Pre-consumer waste: waste generated at retail stages (e.g. unsold textiles).
- 7763 • Post-consumer waste: textiles that have been disposed of after consumption and use by the
7764 citizen or end-users of commercial and industrial activities (hotel, healthcare, etc.), commonly
7765 referred to as household and commercial post-consumer textile waste, respectively.

7766 Therefore, waste is relevant in different stages of the textile product value chain. There seems to be room for
7767 improvement in the expected generation of waste. In terms of post-industrial waste, methods have been
7768 developed to design textile apparel that minimises cutting waste and puts nearly all offcuts into production
7769 (Niinimäki et al., 2020). Most of the leftover material from textile apparel manufacturing (post-industrial waste)

7770 ends up dumped or burned (Aus et al., 2021). It is technically feasible to increase the separate collection of
7771 textile products, especially those with highly valuable materials. Directive 2008/98/EC requires Member States
7772 to ensure the separate collection of textiles by 2025. Moreover, a proposal for a targeted revision of this
7773 Directive is currently in co-decision and is expected to introduce more detailed collection and sorting
7774 requirements and the establishment of Extended Producer Responsibility (EPR) for certain textile and footwear
7775 products in Member States.

7776 Environmental aspects

7777 The impacts from the fashion industry include over 92 million tonnes of waste produced per year, accounting
7778 for up to 22% of mixed waste worldwide (Niinimäki et al., 2020). As mentioned in Section 3.3.2, the EU
7779 generated in 2019 around 12.6 Mt of textile waste. Around 86% of that waste is post-consumer waste. The
7780 current management of textile waste is considered suboptimal, as landfilling and incineration are the
7781 predominant treatment methods (Solis et al., 2024), releasing harmful substances and contributing to global
7782 warming, among other environmental impacts.

7783 In Europe, on average 37% of textiles waste are separately collected (Amicarelli et al., 2022). The majority of
7784 post-consumer waste that is separately collected is sent outside the EU as used products intended for re-use.
7785 However due to the saturation of the global market for such used products many items are instead discarded
7786 in third countries causing negative environmental and social impacts (Huygens et al., 2023).

7787 Strategies aiming at reducing the amount of waste generated, or at increasing the amount of textile waste
7788 collected and sorted at end of life, would have a significant benefit on the environment.

7789 Socioeconomic

7790 As pointed out in Section 5.6, the exports of used textiles from the EU reached 1 700 000 tonnes in 2019.
7791 Usually, these products are exported to Africa for a first screening in local markets, then down-cycled into
7792 industrial rags or filling, or re-exported to Asia for recycling. A significant amount of this waste ends up in Asian
7793 and South American landfills.

7794 Reducing the amount of waste that is sent to landfill could also stimulate the creation of jobs, related to the
7795 collection, sorting and recycling of textiles.

7796 The expected generation of waste is directly related with consumers. The apparent consumption of textile
7797 apparel has doubled after the opening of the EU market to products coming from China, as explained in section
7798 5.2. Section 6.4.1 already highlighted the main factors influencing disposal decisions (perceived quality being
7799 one of the key aspects). Material defects, inappropriate size, loss of shape, or not liking the item, are also
7800 important factors (Kleinhüchelkotten et al., 2018b). Sharing with social circles, donating or swapping are
7801 common ways to dispose of apparel no longer being used. Throwing away usable apparel is generally perceived
7802 as a socially reproachable behaviour (despite this, large amounts of textile waste are still generated nowadays,
7803 as pointed out above).

7804 Qualitative assessment of relevance

7805 Based on the above, expected generation of waste is considered a relevant product aspect in the context of
7806 textile apparel.

7807

7808 **10.9.2 Supporting information on parameters affecting the physical durability**

7809 **Table 121** reports the main fibre characteristics playing a role in the physical durability of textile apparel.
7810 Additionally, **Table 122** and **Table 123** report definitions of yarn and fabric characteristics and main process
7811 parameters, respectively. This information supports the description of interlinks among several factors in the
7812 textile apparel production.

7813 **Table 124** reports the influence of fibre characteristics on yarn and fabric characteristics. **Fibre length**
7814 influences the strength, smoothness, and uniformity of the fabric, with longer fibres enhancing the physical
7815 performance of yarns and fabrics. **Fibre strength** is critical to the physical durability of the yarn and has a
7816 direct impact on the ability of the textile apparel to withstand wear and tear. **Fibre fineness** is important for
7817 producing finer yarns, which are essential for creating smoother, softer and more uniform products, enhancing
7818 the texture, comfort and appearance of textile apparel. **Fibre elasticity**, which is the ability of fibres to return
7819 to their original shape after stretching, is vital for the resilience and shape retention of the fabric. Additionally,
7820 the type of fibre, whether natural or chemical, plays a significant role. More details are reported in **Table 124**.

7821 Fibre characteristics are largely influenced by various external factors. **Environmental conditions** such as
7822 climate and soil characteristics significantly affect natural fibres, while the diet and health of animals impact
7823 the characteristics of fibres like wool and silk. **Chemical exposures**, including pesticides and pollutants, can
7824 degrade fibre characteristics. Additionally, the mechanical and chemical processing techniques used during fibre
7825 production can alter their strength, elasticity, and overall integrity. Finally, **moisture and temperature during**
7826 **the storage** of fibres plays a crucial role in preventing damage like mould growth or material degradation,
7827 ensuring fibres maintain their desired properties (Hearle and Morton, 2008) (Mishra, 2000) (Rahman et al.,
7828 2023).

7829 Understanding the influence of fibre characteristics on yarn, processing and fabric is essential for optimizing
7830 manufacturing processes and achieving desired textile performance and aesthetics.

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7832

7833 **Table 121.** Description of the main fibre characteristics

Fibre characteristic	Definition	Description of natural fibres	Description of chemical fibres	Source
Fibre length	The length of the individual staple fibre ²¹⁵	<p>Natural fibre lengths are generally categorised into: Short (S) – Less than 25mm; Medium (M) – 25-30mm; Long (L) – 30-37mm; and Extra Long Staple (ELS) – Over 37mm.</p> <p>Specific natural fibre lengths: Silk (continuous): 50 000 to 1 500 000 cm Hemp: average 182.88 cm Flax: up to 90 cm Wool:</p> <ul style="list-style-type: none"> • Fine wool: 3.8 to 12.7 cm • Medium wool 6.35 to 15.24 cm • Courser or long 12.7 to 38.1 cm <p>Cotton:</p> <ul style="list-style-type: none"> • Very short-staple cotton: ≤2.1 cm • Short staple cotton: >2.2 cm and <2.5 cm • Medium Staple cotton: >2.6 cm and < 2.8 cm • Ordinary long-staple cotton: >2.9 cm and < 3.4 cm • Extra-long staple cotton: ≥3.4 cm 	Chemical fibre lengths can be considered continuous	<p>https://textileexchange.org/glossary/fibre-length/</p> <p>https://www.textilecoach.net/post/cotton-fibre#:~:text=Short%20staple%20cotton%3A%20%3E22mm%20and,staple%20cotton%3A%20%2E2%89%A534%20mm</p> <p>https://www.fao.org/natural-fibres-2009/about/15-natural-fibres/en/</p>
Fibre strength	The strength of an individual fibre	<p>It is generally measured by tenacity, defined as the breaking force of the fibre divided by the weight of 1000 m of fibre (e.g. cN/tex²¹⁶).</p> <p>Minimum fibre strength =6 cN/tex is technically acceptable for spinning processes.</p>		<p>(Lamb, 2009)</p> <p>https://textilelearner.net/properties-of-silk-fibre/#~:text=Tenacity%3A,Silk%20loses%20strength%20on%20wetting</p> <p>https://omnexus.specialchem.com/polymer-property/strength-at-break-tensile</p> <p>(Rahman Khan et al., 2011)</p> <p>https://cmdgroup.in/physical-properties-of-fibres.php</p> <p>https://oldswicofil.com/products/223polyamideimide.html</p> <p>https://www.tp-industrial.com/files/specs-polyamide-1.pdf</p>
		<p>Significant breaking strengths of most used natural fibres for textile apparel: Hemp: 65.5-72.5 cN/tex Silk: 29.1-42.3 cN/tex Cotton: 15-40 cN/tex Wool: 12-18 cN/tex Flax: 7.37 cN/tex</p>	<p>Significant breaking strengths of most used chemical fibres for textile apparel: Polyamide: 65-82 cN/tex Polyester: 35-60 cN/tex Acrylic: 19.6-29.4 cN/tex Viscose: 19.6 cN/tex Acetate: 12.7 cN/tex</p>	

²¹⁵ Considering that man-made fibres are assigned infinite length.

²¹⁶ cN/tex= centi Newton / Tex is a unit allowing to qualify the elastic capacity of a textile or a yarn

Fibre characteristic	Definition	Description of natural fibres	Description of chemical fibres	Source
Fibre cleanliness	Refers to the degree of fibre contamination with impurities ²¹⁷	<p>Impurities are classified into ranges and according to the impurities grade and are mainly common in natural fibres, but they can appear in chemical fibres due to the treatment agents such as lubricants and oils in chemical fibres production.</p> <p>Range of impurities:</p> <ul style="list-style-type: none"> • ≥7 %- Very dirty • 4-7 %- Dirty • 2-4%- Medium • 1.2-2- Clean • ≤1.2- Very clean <p>Impurities grade (AFIS²¹⁸):</p> <ul style="list-style-type: none"> • ≤15 µm- Breathable dust • 15-50 µm- Micro dust • 50-500 µm- Dust • ≥500 µm-Trash 		http://www.definetextile.com/2013/04/fibre-cleanliness.html
Fibre fineness	Determines the number of fibres that can made up the cross-section of a yarn with a specific thickness.	<p>Measures units of mass per unit of length to assess linear density (e.g. dtex²¹⁹)</p> <p>According to the classification of Sekhri (Sekhri, 2016), fibre fineness can be classified as it follows:</p> <ul style="list-style-type: none"> • Thick fibres >7 dtex • Semi-fine fibres: 7-2.4 dtex • Fine fibres: 2.4-1 dtex • Microfibres: 1-0.3 dtex • Super microfibres <0.3 dtex <p>Hemp: 48.1-186.9 dtex Wool: 3.5 dtex Flax: 1.39- 1.7 dtex Cotton: 1.6 dtex Silk: 0.95-1.6 dtex</p>	<p>The minimum fineness that the raw material and technology permits obtaining for the conventional applications is presented below, considering that the fineness can be increased depending on the application:</p> <p>Polyester: 0.8-3 dtex (ultrafine or microfibre 0.55 dtex) Polyamide: minimum 1 dtex Acrylic: minimum 0.9 dtex Viscose: minimum 1.2 dtex Acetate: minimum 1.5 dtex</p>	<p>http://www.definetextile.com/2013/04/fibre-fineness.html</p> <p>(Ramey, 2018) (Fibre Fineness - an overview ScienceDirect Topics, n.d.) (Rahman Khan et al., 2011) (Banale, 2017) (Chapter 3. Fibre fineness and transverse dimensions, 2008) (Goudar and Kulloli, 2022)</p>

²¹⁷ The impurities may be natural from the cultivation process, but also generated by processing. Generally, impurities must be eliminated via a cleaning process.

²¹⁸ AFIS (Advanced Fibre Information System)

²¹⁹ dtex (deci-tex): Grams per 10.000 metres of yarn

Fibre characteristic	Definition	Description of natural fibres	Description of chemical fibres	Source
Fibre colour	The colour of the fibre affects the ability of a yarn or fabric to be dyed or bleached.	The performance of yarn during dyeing or bleaching is influenced by the natural colour of the fibre. This characteristic is mainly relevant to natural fibres. The colour of man-made fibres can be controlled during the production process.	This does not apply to chemical fibres.	https://www.fao.org/natural-fibres-2009/about/15-natural-fibres/en/
Fibre stiffness	Fibre stiffness refers to the ability of a fibre to resist deformation or bending when subjected to a load	Commonly measured using parameters like Young's modulus or bending modulus, which characterise the material resistance to deformation. It depends on the fibre substance and the relationship between fibre length and fibre fineness: <ul style="list-style-type: none"> The length of the fibre is proportional to the bending modulus. The following relationship can be indicated: <ul style="list-style-type: none"> Thick fibres are generally stiff, firm and wrinkle-resistant. Fine fibres are soft, flexible and generate good drape.		(Ferrándiz et al., 2021)

7834 *Source: own knowledge and sources indicated in the table*

7835 **Table 122.** Definitions of yarn and fabric characteristics

Intermediate textile product	Characteristic	Definition	Source
Yarn	Evenness	Yarn evenness refers to the uniformity of the yarn in terms of thickness and weight along its length.	(Elmogahzy, 2019)
	Hairiness	Yarn hairiness refers to the presence and extent of fibre ends and loops protruding from the main body of the yarn.	(Elmogahzy, 2019)
	Strength	Yarn strength refers to the ability of a yarn to withstand tensile forces without breaking.	(Elmogahzy, 2019)
	Appearance	Yarn appearance refers to the visual and physical characteristics of yarn, including diameter, hairiness, and defects, which affect its performance and the physical durability of the final fabric.	(Tahvildar et al., 2019; Li et al., 2020)
Fabric	Handle	Fabric handle refers to the tactile qualities of a fabric, encompassing its softness, smoothness, flexibility, and overall sensation when touched, which contribute to its comfort and user experience	(Tahvildar et al., 2019; Li et al., 2020)
	Lustre	The visual aspect of a fabric or yarn that reflects light in a way that creates a shiny or glossy appearance.	(Kim et al., 2004)
	Strength	Fabric strength can be defined as the ability of a fabric to withstand various forces and stresses without breaking or deforming	(Mobarak Hossain, 2016)
	Appearance	Fabric appearance encompasses the overall look and visual appeal of the fabric, which is influenced by factors such as weave structure, yarn compactness, and finishing processes.	(Tahvildar et al., 2019)
	Drape	Fabric drape refers to how the fabric hangs in three dimensions, retaining its shape from when it is laid flat or adapting to new contours.	(Choudhary and Bansal, 2017)
	Smoothness	Fabric smoothness refers to the fabric surface resistance to a sliding tangential force applied.	(Mao et al., 2016)
	Softness	Fabric softness refers to the tactile sensation or comfort level experienced when touching or wearing a fabric.	(Ferrándiz et al., 2021)
	Breathability	Breathability in fabrics is the ability of water vapours to successfully permeate through that fabric via diffusion and, henceforth, facilitate cooling via evaporation.	(İnovenso Teknoloji Ltd.Şti and Mustafa, 2023)
	Insulation	Fabric insulation refers to a fabric's ability to retain heat and provide warmth by reducing the transfer of heat from the body to the surrounding environment.	(Matusiak Malgorzata and Sikorski Renata, 2011)
Anti-wrinkle	Anti-wrinkle is a finishing method for textiles that prevents creases and wrinkles, enhancing the appearance of the articles.	(Van den Bergen and Parker, 2023)	

Intermediate textile product	Characteristic	Definition	Source
	Resistance to stains and water	Resistance to stains refers to the ability of a fabric to repel or prevent the absorption of various staining substances, thereby maintaining its appearance and cleanliness over time. Resistance to water, also known as water repellency, describes the capacity of a fabric to prevent water from penetrating its surface, thus keeping the material dry and maintaining its structural integrity.	(Rowen and Gagliardi, 1947) (Roy Choudhury, 2017)

7836

Source: AITEX's knowledge and references reported in the last column

7837

Table 123. Definitions of main process parameters

Process parameter	Definition	Sources
Spinning method	The spinning method encompasses various techniques used to transform raw fibres into yarn. These methods involve processes that draw out and twist the fibres, creating a continuous strand of yarn. For detailed descriptions of different spinners, refer to section 10.2.2.	(Elmogahzy, 2019) (Sinha and Chattopadhyay, 2007)
Spinning limit	The spinning limit defines the range of yarn counts achievable from a given fibre using a specific spinning system. It depends on the number and thickness of individual fibres (for natural fibres) or filaments (for chemical fibres) twisted together.	(Mahmoudi, 2010)
Spinning Productivity	Spinning productivity can be defined as the production of the finest yarn count from a given fibre ensuring acceptable performance and minimising end breakage rates.	(Tyagi, 2010)
Twist level	Twist level is defined by the number of turns per unit length (per inch or per meter) in a spun yarn. It describes yarn density.	(Mobarak Hossain, 2016)
Twists number	The twist number quantifies the number of turns about its axis per unit length of a yarn or textile strand. It is expressed as turns per inch (TPI), turns per meter (TPM), or turns per centimetre (TPCM).	(Rahman et al, 2023)
Spinning tension	Spinning tension represents the resistance or force applied to the yarn during the spinning process.	
Speed of spinning	The speed of spinning defines the rate at which fibres are converted into yarn during spinning.	
Rolling, revolving, and twisting movements	These fundamental movements in spinning: Rolling: Rotation of fibres to align them, Revolving: Circular motion of the spindle, Twisting: Imparting twists to the fibres, resulting in yarn formation	
Yarn manufacturing process development	Encompasses the life cycle stage for converting raw fibres into yarn.	
Conditioning (steaming)	It involves moistening the yarn using saturated steam or wet steam.	
Spinning twist limit	The spinning twist limit defines the upper range of yarn count achievable for a given fibre and spinning system, determining the maximum fineness of yarn produced.	
Temperature and humidity control	Maintaining optimal temperature and humidity levels is crucial. High humidity improves yarn properties, while excessive moisture can lead to issues.	
Dyeing process	Dyeing involves applying colour to yarn or fabric.	
Characteristics of components and machinery	The characteristics of components and machinery directly affects yarn production. Well-maintained, precise equipment ensures consistent yarn properties.	
Defects control	Defect control focuses on minimising flaws in yarn, such as knots or irregularities, enhancing yarn desired performances, and reducing waste.	
Thread count	Thread count refers to the number of yarns (threads) per unit length in woven fabrics, and it affects fabric density and texture.	
Weight of fabric	The weight of fabric is determined by the total mass of yarn used per unit area, influencing fabric thickness and durability.	

Process parameter	Definition	Sources
Weave pattern	The weave pattern describes how warp and weft yarns interlace to form fabric	

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Source: AITEX's knowledge and references reported in the last column

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Table 124 Influence of the fibre characteristics on yarn and fabric characteristics and parameters of manufacturing processes

Characteristic or parameter	Fibre length ⁽¹⁾	Fibre strength	Fibre cleanliness	Fibre fineness	Fibre colour	Fibre stiffness ⁽²⁾
Yarn characteristics	Evenness	Yarn evenness increases during drafting ²²⁰ proportionally with the fibre length.	Yarn evenness increases proportionally with the increase of fibre strength (smaller extent).		Yarn evenness increases proportionally with the increase of fibre fineness. ⁽⁵⁾	
	Hairiness ⁽³⁾	Yarn hairiness decreases with the increase of fibre length.	Yarn hairiness decreases with the increase of fibre strength.		Yarn hairiness increases with the increase of fibre fineness. ⁽⁵⁾	
	Strength	Yarn strength increases proportionally with fibre length increase.				
	Appearance			Yarn appearance improves with the increase of fibre cleanliness. ⁽⁴⁾		
Yarn manufacturing (spinning) parameters	Twist limit				Twist limit decreases with the increase of fibre fineness, after the optimal working range.	
	Spinning limit	Spinning limit increases proportionally with the increase of fibre length.	Spinning limit increases proportionally with the increase of fibre strength.		Spinning limit increases proportionally with the increase of fibre fineness.	
	Spinning productivity	Spinning productivity increases with the increase of fibre length.	Spinning productivity increases with the increase of fibre strength.		Spinning productivity increases with the increase of fibre fineness.	

²²⁰ Drafting is the process of reducing the thickness of fibres to achieve specific fineness and strength for yarns (Rahman et al., 2023).

Characteristic or parameter		Fibre length ⁽¹⁾	Fibre strength	Fibre cleanliness	Fibre fineness	Fibre colour	Fibre stiffness ⁽²⁾
	Rolling, revolving, and twisting movements						
	Spinning process development			Spinning process improves with the increase of fibre cleanliness. ⁽⁴⁾			Spinning process worsens with the increase of fibre stiffness.
Finishing processes parameters	Dyeing					Dyeing process efficiency decreases with the increase of fibre natural colour. ⁽⁶⁾	
Fabric characteristics	Handle	Fabric softness increases with the increase of fibre length.			Fabric softness increases with the increase of fibre fineness.		
	Luster	Fabric shininess increases with the increase of fibre length.			Fabric shininess increases with the increase of fibre fineness.		
	Strength		Fabric resistance to tear strength increases with the increase of fibre strength.				
	Appearance			Fabric appearance improves with the increase of fibre cleanliness. ⁽⁴⁾			
	Drape				Fabric drape improves with the increase of fibre fineness.		

7840 ⁽¹⁾ Most commonly related to natural fibres and mechanically recycled synthetic or other man-made fibres. It defines the spinnability of the fibre.

7841 ⁽²⁾ A fibre that is too stiff has difficulty in adapting to process movements. The lower the springiness generates more creation of neps (entangled and knotted fibres generated by increased stiffness).

7842 ⁽³⁾ Unwanted parameter

7843 ⁽⁴⁾ Impurities generate a bad yarn drying, with broken ends increased, generating a worse appearance. Additionally, impurities interfere with the process development affecting the strength of the material to be processed. Finally, impacts the appearance and physical characteristics of the fabric and finished product.

7844 ⁽⁵⁾ A finer the fibre allows a multitude of fibres/filaments in the cross-section, allowing a better distribution in the yarn. Fibre fineness decreases after the optimal working range and yarn hairiness will increase.

7845 ⁽⁶⁾ The intrinsic colour of the fibre interferes with the dyeing process.

7847 Source: AITEX's knowledge and **Figure 21**

7848 **Yarn manufacturing**, the spinning process combining rolling, revolving and twisting movements, is defined by parameters that influence the final yarn characteristics.

7849 **Table 125** reports the effect of main process parameters on the characteristics of the yarn. The selection of the spinning method influences the evenness, softness and
7850 strength of the yarns. Nevertheless, the twist level and number impact the strength and softness of the yarns. Controlling optimal spinning tension and speed is important
7851 due to the impact on the strength of the yarn. Proper yarn conditioning has the potential to enhance characteristics such as flexibility, strength and evenness. Manufacturing
7852 process parameters such as temperature and humidity control and the characteristics of components and machinery, completed with performance control, influence overall
7853 the mechanical-related strength of the yarns.

7854 Understanding and controlling these processing parameters enables manufacturers to customise yarn characteristics for precise end applications, like textiles for fashion
7855 such as underwear, jackets, or accessories. Adjustments in these parameters can result in notable differences in yarn physical performance and durability, demonstrating
7856 the importance of precise control and monitoring during the spinning process.

7857

7858 **Table 125.** Influence of spinning parameters on yarn characteristics

Yarn characteristics	Spinning method	Twist level	Twists number	Spinning tension (²)	Speed of spinning	Conditioning (steaming)	Temperature and humidity control	Characteristics of components and machinery	Defects control
Yarn evenness	Air-Jet Spinning → highly uniform yarns			Constant tension: uniform yarn		Enhances evenness	Proper humidity prevents static electricity, material processing issues, equipment damage, and fabric shrinkage.	High quality of the machinery produces consistent yarns. Ensures improved efficiency, safety, productivity, and product performance	Critical for maintaining high-performance standards and preventing imperfections in yarn and fabric
Yarn elasticity					Enhances flexibility				
Yarn softness	Air-Jet Spinning → highly smooth yarns	Low Twist: softer yarns							
Yarn strength	Ring Spinning → very high-strength and finer yarns Rotor (Open-End) Spinning → bulkier yarns with reduced strength Air-Jet Spinning → less durable yarns	High Twist: stronger yarns	Yarn strength increases with twist to a peak (¹), then decreases.	Uneven Tension: can cause breakages during subsequent processing	Higher Speeds: can cause breakages	Enhances strength			

7859 (¹) Optimal twist depends on fibre length, fineness, strength, and friction.

7860 (²) Spinning tension: Essential for evaluating ring spinning machine performance.

7861 Source: AITEX's knowledge and **Figure 21**

7862 In the **fabric manufacturing**, the industry opts for either weaving or knitting techniques, depending on the intended use of the final products. The parameters involved in
 7863 weaving significantly impact the characteristics of the fabric. These are the yarn count, weight of fabric, and weave pattern, among others. **Table 126** reports the influence
 7864 of the main weaving parameters on the fabric characteristics. A higher thread count defines smoother, softer, and more breathable fabrics. Meanwhile, the weight of the
 7865 fabric improves the resistance to tear but decreases breathability and drape. Finally, the selection of the weave pattern impacts the resistance to tear and is done according
 7866 to the desired functionality, such as smoothness, anti-wrinkle, and resistance to stains and water.

7867 **Table 126.** Influence of weaving parameters on fabric characteristics

Parameter	Type	Fabric characteristic							
		Smoothness	Softness	Breathability	Tear strength	Insulation	Anti-wrinkle	Resistance to stains and water	Drape
Thread count ⁽¹⁾	Higher the number of threads	Increases fabric smoothness	Increases fabric softness	Decreases fabric breathability					
Weight of fabric ⁽²⁾	Heavier fabric			Decreases fabric breathability	Increases resistance to tear	Increases fabric insulation properties			Decreases fabric drape
Weave pattern ⁽³⁾	Plain (eg. Chiffon, organza)	Increases fabric smoothness		Increases fabric breathability					
	Diagonal (eg. twill)				Increases resistance to tear		Increases fabric anti-wrinkle capacity	Increases fabric resistance to stains and water	
	Satin	Increases fabric smoothness			Decreases fabric resistance to tear				

7868 ⁽¹⁾ Generally, more important for fabrics intended to be used in contact with the skin (e.g. beddings, textile apparel). The optimal thread count can vary depending on the desired fabric use and feel, and sometimes
 7869 higher thread counts are achieved by using multiple-ply yarns, which can affect the fabric differently.

7870 ⁽²⁾ The weight is influenced by the yarn's thickness and the tightness of the weave or knit. Generally more important for fabrics such as upholstery or drapery.

7871 The fabric construction parameters, including weave pattern, yarn count, fabric thickness, and compaction, influence tear strength. Fabrics with denser weaves, higher yarn counts, and thicker constructions tend to
 7872 exhibit higher tear resistance.

7873 The weight or mass of the fabric per unit area is indicative of fibre concentration and arrangement. Heavier fabrics with higher yarn density typically offer better tear strength. The denser packing of fibres in the
 7874 fabric structure increases resistance to tearing forces.

7875 ⁽³⁾ Each weaving pattern offers unique characteristics that can be leveraged for specific applications, impacting not only the aesthetics of the fabric but also its performance in various uses

7876 Source: AITEX's knowledge and **Figure 21**

7877

7878 **Table 127** reports the influence of finishing processes on fabric characteristics. **Fabric finishing** is a crucial
 7879 stage in manufacturing that imparts specific aesthetic and technical functionalities to the fabric. **Dyeing** plays
 7880 a significant role, as the choice of dye and dyeing technique can greatly influence colour fastness ⁽²²¹⁾, hand
 7881 feel, colour depth, and evenness. **Table 65** reports information on the relationship between fibre type and dye
 7882 affinity. **Printing** affects the vibrancy of colours and the handle of the fabric. **Chemical finishing** imparts
 7883 various properties to the fabric, such as improved handle and repellency to water, oil, and stains, thereby
 7884 enhancing its physical durability. Mechanical finishing alters the fabric's physical properties, contributing to
 7885 smoothness or improving the handle, such as adding fluffiness. **Coating and laminating** processes are used
 7886 to enhance fabric performance by adding waterproofing capabilities and increasing breathability or resistance
 7887 to abrasion (Rahman et al., 2023).

7888 **Table 127.** Influence of finishing processes on fabric characteristics

Finishing process type	Primary influence on fabric characteristics
Dyeing	Colour depth, evenness, and fastness
Printing	Pattern precision, vibrancy, and hand feel
Chemical Finishing	Functional properties like softness, repellence
Mechanical Finishing	Physical properties like smoothness, plushness
Coating and Laminating	Protective and performance-enhancing characteristics such as waterproofing, breathability

7889 *Source: AITEX's knowledge and Figure 21*

7890 Three main components affect the physical durability during **confectioning** of the textile apparel: the sewing
 7891 physical characteristics, precision of cuts, and seam strength. **Sewing physical characteristics** include the
 7892 straightness of seams, consistency of stitch length, and the absence of skipped stitches. These affect both the
 7893 appearance and physical durability of the textile apparel. The **strength and type of seams** used in fabric
 7894 assembly determine the physical durability of the textile apparel and its ability to endure wear and stress.
 7895 Inadequately constructed seams may result in rapid deterioration. **Precise cutting** following patterns is
 7896 essential for ensuring that the textile apparel fits properly. Mistakes in cutting can result in poorly fitting textile
 7897 apparel, directly affecting consumer satisfaction (Rahman et al., 2023) (Elhawary, 2015b).

7898

²²¹ Colour fastness refers to the resistance of a fabric's colour to fading or running when exposed to various conditions, such as washing, sunlight, rubbing, and perspiration

7899 **10.9.3 Supporting information on test methods to describe the physical durability**

7900 **Table 128.** Description of standardised test methods to assess key parameters of physical durability

Parameter	Testing method	Short description of the scope of the test	Type of result obtained
Abrasion resistance	ISO 12947-2:2016 ²²² Textiles — Determination of the abrasion resistance of fabrics by the Martindale method Part 2: Determination of specimen breakdown	It specifies a method for determining the abrasion resistance of textile fabrics using the Martindale method, by determining when a textile fabric reaches breakdown by inspecting it at regular intervals. It applies to all textile fabrics, including nonwovens, except for fabrics with a specified low abrasion wear life. These results help to determine the durability and longevity of the fabric when subjected to repetitive friction.	Number of rubs or cycles The results are typically expressed as the Number of Rubs or Cycles, which indicates the number of abrasion cycles the fabric can withstand before showing significant wear or damage.
Bursting resistance	ISO 13938-2:2019 ²²³ (50cm ²) Textiles — Bursting properties of fabrics. Part 2: Pneumatic method for determination of bursting strength and bursting distension	It specifies a method for determining the bursting strength and expansion of textile fabrics using a pneumatic method. When tested using a specimen size of 50 cm ² . These measurements provide critical information about the fabric's resistance to pressure and its ability to stretch before failing.	Kilopascals (kPa) The results are typically expressed as kilopascals (kPa), indicating the pressure required to burst the fabric.
Colour fastness to chlorinated water	ISO 105-E03:2010 ²²⁴ Textiles - Tests for colour fastness - Part E03: Colour fastness to chlorinated water (swimming-pool water) (ISO 105-E03:2010)	It specifies a method for determining the resistance of textile colours, on fabrics, to active chlorine, like the concentrations used in swimming pool water for disinfection. These grades indicate how well a fabric's colour resists fading and staining when exposed to chlorinated water, which is crucial for textiles used in swimwear and other water-related applications.	Grading scale The results obtained from this test are typically expressed as Colour Fastness Grade: This is assessed using the Grey Scale for Colour Change and the Grey Scale for Staining, which range from 1 to 5, where: Grade 1: Very poor colour fastness. Grade 2: Poor colour fastness. Grade 3: Moderate colour fastness. Grade 4: Good colour fastness. Grade 5: Excellent colour fastness.
Dimensional change	ISO 3759:2011 ²²⁵ Textiles — Preparation, marking and measuring of fabric specimens and textile apparel in tests for determination of dimensional change	Provides a method for preparing, marking, and measuring textile fabrics, textile apparel, and fabric assemblies to test how they change in size after treatments like washing, dry cleaning, soaking, or steaming. These treatments must follow procedures from specific ISOs. It applies to woven and knitted fabrics and finished textile articles but does not apply to certain upholstery coverings.	Percentage (%) This percentage reflects the dimensional change, such as shrinkage or stretching of the fabric after washing or dry cleaning. The percentage change is calculated based on the difference between the original and the post-treatment dimensions.
Elasticity of fabric	ISO 20932-3:2018 ²²⁶	It specifies a method for determining the elasticity of textile fabrics using a cyclic testing procedure. These results help to assess the fabric's ability to recover its	Percentage (%) When tested after one minute, the results are typically expressed as extension at specified load: Measured in

²²² ISO 12947-2:2016 Textiles — Determination of the abrasion resistance of fabrics by the Martindale method Part 2: Determination of specimen breakdown. Available at this [link](#).

²²³ ISO 13938-2:2019 Textiles — Bursting properties of fabrics Part 2: Pneumatic method for determination of bursting strength and bursting distension. Available at this [link](#).

²²⁴ ISO 105-E03:2010 Textiles — Tests for colour fastness Part E03: Colour fastness to chlorinated water (swimming-pool water). Available at this [link](#).

²²⁵ ISO 3759:2011 Preparation, marking and measuring of fabric specimens and textile apparel in tests for determination of dimensional change. Available at this [link](#).

²²⁶ ISO 20932-3:2018 Textiles — Determination of the elasticity of fabrics Part 3: Narrow fabrics. Available at this [link](#).

Parameter	Testing method	Short description of the scope of the test	Type of result obtained
	Textiles — Determination of the elasticity of fabrics Part 3: Narrow fabrics	original shape after being stretched, which is important for applications where elasticity and shape retention are critical.	percentage (%), this indicates the amount of stretch or elongation that occurs when a specified load is applied to the fabric.
Colour fastness to artificial light	ISO 105-B02:2014 ²²⁷ Textiles — Tests for colour fastness Part B02: Colour fastness to artificial light: Xenon arc fading lamp test	It specifies a method for determining the colour fastness of textile fabrics to artificial light: the Xenon arc fading lamp test, outlining a method for testing how the colour of textiles, including white or bleached fabrics, reacts to artificial light similar to natural daylight (D65). It allows the use of two different sets of blue wool references, though the results from these references may vary. These grades indicate how well a fabric's colour resists fading when exposed to artificial light, which is crucial for maintaining textiles' appearance over time.	Grading scale The results are typically expressed as Colour Fastness Grade: This is assessed using the Blue Wool Scale, which ranges from 1 to 8, where: Grade 1: Very poor light fastness. Grade 2: Poor light fastness. Grade 3: Moderate light fastness. Grade 4: Fair light fastness. Grade 5: Good light fastness. Grade 6: Very good light fastness. Grade 7: Excellent light fastness. Grade 8: Outstanding light fastness.
Pilling resistance	ISO 12945-2:2020 ²²⁸ (2000 cycles) Textiles — Determination of fabric propensity to surface pilling, fuzzing or matting Part 2: Modified Martindale method	Tests of textiles' pilling resistance are typically expressed as pilling grade. This is a visual assessment of the fabric surface after it has been subjected to 2000 cycles of abrasion.	Grading scale The grading scale usually ranges from 1 to 5, where 1 indicates severe pilling and 5 indicates no pilling. Grade 1: Severe pilling with dense pilling covering the entire fabric surface. Grade 2: Pronounced pilling with significant pilling affecting a large area of the fabric. Grade 3: Moderate pilling with noticeable pilling over a moderate area of the fabric. Grade 4: Slight pilling with some pilling visible but not extensive. Grade 5: No pilling with no visible pilling on the fabric surface.
Colour fastness to sea water	ISO 105-E02:2013 ²²⁹ Textiles — Tests for colour fastness Part E02: Colour fastness to sea water	It specifies a method for determining the colour fastness of textiles to sea water. These grades indicate how well a fabric's colour resists fading and staining when exposed to sea water, providing important information for textiles intended for marine or coastal use.	Grading scale The results obtained from this test are typically expressed as Colour Fastness Grade: This is assessed using the Grey Scale for Colour Change and the Grey Scale for Staining, which range from 1 to 5, where: Grade 1: Very poor colour fastness. Grade 2: Poor colour fastness. Grade 3: Moderate colour fastness. Grade 4: Good colour fastness.

²²⁷ ISO 105-B02:2014 Textiles — Tests for colour fastness Part B02: Colour fastness to artificial light: Xenon arc fading lamp test. Available at this [link](#).

²²⁸ ISO 12945-2:2020 Textiles — Determination of fabric propensity to surface pilling, fuzzing or matting Part 2: Modified Martindale method. Available at this [link](#).

²²⁹ ISO 105-E02:2013 Textiles — Tests for colour fastness Part E02: Colour fastness to sea water). Available at this [link](#).

Parameter	Testing method	Short description of the scope of the test	Type of result obtained
Seam resistance	ISO 13935-2:2014 ²³⁰ Textiles — Seam tensile properties of fabrics and made-up textile articles Part 2: Determination of maximum force to seam rupture using the grab method	It specifies a method for determining the seam strength of textile fabrics by using the grab method, indicating methods for determining the maximum force of sewn seams when force is applied perpendicularly, using the grab test. It primarily applies to woven fabrics, including those with stretch characteristics, but may also apply to other fabric types. These measurements provide critical information about the strength of textile fabrics, which is essential for ensuring the durability and performance of sewn products.	Grade 5: Excellent colour fastness. Newtons (N) The results are typically expressed as Seam-Breaking Force measured in Newtons (N); this indicates the force required to break the seam.
Tensile strength	ISO 13934-1:2014 ²³¹ Textiles — Tensile properties of fabrics Part 1: Determination of maximum force and elongation at maximum force using the strip method	This specifies a method for determining the maximum force and elongation at the maximum force of textile fabrics using a strip method. It mainly applies to woven fabrics, including those with stretch properties from elastomeric fibres, and mechanical or chemical treatments.	Newtons (N) This value reflects the maximum force, which indicates the highest force the fabric can withstand before breaking.
Visual inspection for: (1) Colour change (2) Pilling (3) Trimmings aspect (4) Self-staining	ISO 15487:2018 ²³² Textiles — Method for assessing appearance of apparel and other textile end products after domestic washing and drying	It specifies a method for assessing the appearance of apparel and textile products after one or more cleaning cycles. The evaluation includes factors such as colour change, pilling, fuzzing, matting, fabric smoothness, seam appearance, retention of pressed-increases, and damage to components like buttons or fasteners. It applies to any washable textile product, regardless of fabric construction, as supplied by the manufacturer.	Grading scale The grading scale usually ranges from 1 to 5, where 1 indicates severe distortion or damage, and 5 indicates no visible distortion or damage. Grade 1: Severe distortion or damage, significant loss of fabric integrity. Grade 2: Pronounced distortion or damage, noticeable but not severe. Grade 3: Moderate distortion or damage, visible but not significantly affecting the fabric's usability. Grade 4: Slight distortion or damage, minimal and only noticeable upon close inspection. Grade 5: No visible distortion or damage, fabric maintains its original appearance.

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Source: cited standards

²³⁰ ISO 13935-2:2014 Textiles — Seam tensile properties of fabrics and made-up textile articles Part 2: Determination of maximum force to seam rupture using the grab method. Available at this [link](#).

²³¹ ISO 13934-1: 2014 Textiles - Tensile properties of fabrics - Part 2: Determination of maximum force using the grab method. Available at this [link](#).

²³² ISO 15487:2018 Textiles — Method for assessing appearance of apparel and other textile end products after domestic washing and drying. Available at this [link](#).

7902 **10.9.4 Supporting information on maintenance**

7903 **Table 129.** Comparison of international labelling systems

Characteristic	International Care Labelling System (Ginetex) ²³³	ASTM Care Labelling System ²³⁴	Canadian Care Labelling System ²³⁵	British Care Labelling System ²³⁶	Japanese Care Labelling System ²³⁷	Australian Care Labelling System ²³⁸	China Care Labelling System ²³⁹	ISO Care Labelling System ²⁴⁰
Governing Body	GINETEX	ASTM International	Canadian General Standards Board (CGSB)	British Standards Institution (BSI)	Japanese Industrial Standards (JIS)	Standards Australia and ACCC	China National Textile and Apparel Council (CNTAC)	International Organization for Standardization (ISO)
Region	Global	United States	Canada	United Kingdom	Japan	Australia	China	Global (especially for export procedures)
Primary Symbols	Washing, Bleaching, Drying, Ironing, Professional Care	Washing, Bleaching, Drying, Ironing, Professional Care	Washing, Bleaching, Drying, Ironing, Professional Care	Washing, Bleaching, Drying, Ironing, Professional Care	Washing, Bleaching, Drying, Ironing, Professional Care	Washing, Bleaching, Drying, Ironing, Professional Care	Washing, Bleaching, Drying, Ironing, Professional Care	Washing, Bleaching, Drying, Ironing, Professional Care
Temperature Units	Celsius	Fahrenheit (with some symbols using Celsius)	Celsius and Fahrenheit	Celsius	Celsius	Celsius	Celsius	Celsius (with some flexibility for export)
Text Requirement	No text required	Text required alongside symbols	Text required alongside symbols (bilingual: English and French)	No text required	Text is often included for clarity	Text required alongside symbols	Text required alongside symbols (Chinese characters)	No text required, but can include text for clarity
Drying Symbols	Includes natural and tumble drying symbols	Tumble drying symbols with specific temperature settings	Tumble and natural drying symbols	Natural and tumble drying symbols	Unique symbols for indoor/outdoor and natural drying	Tumble and line drying symbols	Symbols for tumble drying and line drying, with specific instructions for sunlight exposure	Similar to GINETEX; focuses on export needs

²³³ Complete information about International Care Labelling System (Ginetex) available [here](#).

²³⁴ Complete information about ASTM Care Labelling System available [here](#).

²³⁵ Complete information about Canadian Care Labelling System available [here](#).

²³⁶ Complete information about British Care Labelling System available [here](#).

²³⁷ Complete information about Japanese Care Labelling System available [here](#).

²³⁸ Complete information about Australian Care Labelling System available [here](#).

²³⁹ Complete information about Chinese Care Labelling System available [here](#).

²⁴⁰ Complete information about ISO Care Labelling System available [here](#).

Characteristic	International Care Labelling System (Ginetex) ²³³	ASTM Care Labelling System ²³⁴	Canadian Care Labelling System ²³⁵	British Care Labelling System ²³⁶	Japanese Care Labelling System ²³⁷	Australian Care Labelling System ²³⁸	China Care Labelling System ²³⁹	ISO Care Labelling System ²⁴⁰
Bleaching Symbols	Basic symbols for chlorine and non-chlorine bleach	Detailed symbols for bleach types	Specific symbols for non-chlorine bleach	Similar to GINETEX	Specific symbols for bleach types, including traditional care	Similar to GINETEX	Specific symbols for chlorine and non-chlorine bleach, with detailed instructions	Basic symbols for chlorine and non-chlorine bleach
Ironing Symbols	Dots indicating heat level	Dots indicating heat level	Dots indicating heat level	Dots indicating heat level	Dots with additional instructions	Dots indicating heat level	Dots indicating heat level, with additional instructions on steam use	Dots indicating heat level
Professional Care Symbols	Basic dry cleaning and wet cleaning symbols	Detailed symbols for professional care	Basic symbols for dry and wet cleaning	Similar to GINETEX	Detailed symbols including specific letters for different cleaning methods	Similar to GINETEX	Detailed symbols including specific letters for different cleaning methods	Basic dry cleaning and wet cleaning symbols
Language and Accessibility	Universal symbols for easy understanding	Text and symbols for detailed instructions	Symbols with bilingual text (English/French)	Universal symbols to minimize language barriers	Uses both symbols and text, considering Japanese consumers	Uses both symbols and text	Symbols with accompanying text in Chinese for clarity	Universal symbols for global understanding
Legal Requirements	Voluntary but widely adopted	Mandatory compliance with FTC regulations	Mandatory under the Canadian Textile Labelling Act	Voluntary but widely followed in Europe	Mandatory for domestic manufacturers	Mandatory compliance with Australian Standards	Mandatory compliance under Chinese standards	Voluntary for global standardization

Source: own production

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7907 **10.9.5 Supporting information on repairability**

7908 This section reports a simple analysis of professional repair prices against the prices of the new items of textile
 7909 apparel. **Table 130** reports the interval of the relative repair price in EU, which takes into account the price
 7910 intervals of some repair operations carried out by professional repairers and the price intervals of some new
 7911 items. The analysis shows that repairing an item of textile apparel could be many times more expensive than
 7912 buying a new item.

7913 **Table 130.** Comparison between price of professional repair operations and price of new items of textile apparel

Priority part	Failure type	Repair price (EUR)		Items of textile apparel	New item price (EUR)		Relative repair price (%)	
		Min	Max		Min	Max	Min	Max
Fabric	Fabric breakdown	3	9	T-Shirts	3	22	14	300
	Pilling	8	24	Apparel accessories	2	41	20	1 200
				Dresses, Skirts & Jumpsuits	6	90	9	400
				Jackets & Coats	7	589	1	343
				Leggins, stockings, tights and socks	1	19	42	2 400
				Pants & Shorts	3	66	12	800
				Shirts & Blouses	3	90	9	800
				Sweaters and midlayers	3	85	9	800
				Swimsuits	8	74	11	300
				T-Shirts	3	22	36	800
	Stains	3	51	Apparel accessories	2	41	7	2 550
				Dresses, Skirts & Jumpsuits	6	90	3	850
				Jackets & Coats	7	589	1	729
				Leggins, stockings, tights and socks	1	19	16	5 100
				Pants & Shorts	3	66	5	1 700
				Shirts & Blouses	3	90	3	1 700
				Sweaters and midlayers	3	85	4	1 700
				Swimsuits	8	74	4	638
				T-Shirts	3	22	14	1 700
Seam	Hole(s) in seams	3	32	Apparel accessories	2	41	7	1 600
				Dresses, Skirts & Jumpsuits	6	90	3	533
				Jackets & Coats	7	589	1	457
				Leggins, stockings, tights and socks	1	19	16	3 200
				Pants & Shorts	3	66	5	1 067
				Shirts & Blouses	3	90	3	1 067
				Sweaters and midlayers	3	85	4	1 067
				Swimsuits	8	74	4	400
				T-Shirts	3	22	14	1067
Trim	Buttons	1	8	Apparel accessories	2	41	2	400
				Dresses, Skirts & Jumpsuits	6	90	1	133
				Jackets & Coats	7	589	0	114
				Leggins, stockings, tights and socks	1	19	5	800
				Pants & Shorts	3	66	2	267

Priority part	Failure type	Repair price (EUR)		Items of textile apparel	New item price (EUR)		Relative repair price (%)	
		Min	Max		Min	Max	Min	Max
				Shirts & Blouses	3	90	1	267
				Sweaters and midlayers	3	85	1	267
				Swimsuits	8	74	1	100
				T-Shirts	3	22	5	267
	Zips	6	32	Apparel accessories	2	41	15	1 600
				Dresses, Skirts & Jumpsuits	6	90	7	533
				Jackets & Coats	7	589	1	457
				Leggins, stockings, tights and socks	1	19	32	3 200
				Pants & Shorts	3	66	9	1 067
				Shirts & Blouses	3	90	7	1 067
				Sweaters and midlayers	3	85	7	1 067
				Swimsuits	8	74	8	400
				T-Shirts	3	22	27	1 067

7914 Prices are reported without VAT. Repair price were sourced from websites reported in **Table 131**.

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$$\text{Relative repair price (\%)} = \frac{\text{price of repair}}{\text{price of new apparel textile}} * 100$$

7916 Source: own elaboration based on (Cooper and Claxton, 2022c) and Statista ⁽²⁴¹⁾.

7917 **Table 131.** Repair shops and dry cleaners consulted for the analysis reported in **Table 130**

Type	Country	Link
Repair shop	Spain	https://arreglosderopabarcelona.es/tarifas-precios-arreglos-ropa/ https://www.pepevera.com/lista_precios
	Romania	https://www.croitoriepentrutoti.ro/preturi/ https://www.urbanwash.ro/images/lista-croitorie-arad.pdf https://atelierdecroitorie.ro/servicii-si-preturi https://www.atelier-croitorie.com/lista-preturi-croitorie-retus
	Ireland	https://paulhenrytailoring.ie/alterations-dublin
	Sweden	https://www.masterarnes.se/skr%C3%A4dderi.html https://www.jeansverket.se/en/jeans/repairs/ https://secondsunrise.se/pages/repairs
	Italy	https://endelea.it/pages/wear-again-textile-apparel-restoration-hub
Dry cleaners	Spain	https://tintoriasronsel.es/tienda/precios-tarifas-y-promociones-de-tintoreria/
	Romania	https://ecoclean.ro/preturi/ https://www.elisse.ro/preturi-spalatorie-haine.html https://www.extraclean.ro/preturi-curatorie-spalatorie-calcatorie-haine-bucuresti/

7918 Source: reported websites

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²⁴¹ Statista. Available at [this link](#). Last accessed 8 August 2024.

