

Questions and answers to the product aspect of durability

Preparatory study on textile products

This document contains answers to a list of questions submitted to the JRC on 3 January 2025 by EuroCommerce, relative to Task 4 of the [preparatory study on textile products](#).

It should be noted that the questions listed below refer to the document "[Task 4 of the preparatory study on textile products - November 2024](#)". However, the contributions to be submitted by stakeholders as part of the on-going consultation should refer to the file "[Working document of the 2nd milestone](#)". The answers provided by the JRC refer to said working document.

The webpage [Project Plan](#) describes how to contribute to the 2nd milestone of the preparatory study on textile products. The JRC encourages any further comments and observations to be submitted as part of the open consultation on the 2nd milestone report.

1. Proposed durability framework

ID	Question	Answer
1.1	What is it meant by "new product"? Does it mean an unwashed product?	The new product is an unused product that is ready to be purchased by the user. If stakeholders consider that the working document should include a definition of what constitutes a "new product", the JRC invites them to provide a specific comment with a proposal for such a definition. Section 9.2.1.3 describes that the physical durability is assessed via five steps. The simulation of the aging process is the 3 rd step (see line 2889). Lines 2901-2916 describe how the aging process is simulated via cleaning cycles.
1.2	Should the "value of the new item" be based on the characteristics of the new product defined in Table 5, or should companies own values be used? If own values are to be used, how will comparability and level playing field be addressed?	Neither. Section 9 addresses the Task 4 of the MEErP providing a general technical analysis of the products in the scope. This analysis aims to describe the Base Case of technologies, the Best Available Technologies, and the Best Not yet Available Technologies (see lines 2518-2538). Section 9.2.1.4 describes these product technologies per category (see lines 2935-3011). This is a description of products already on the market.
1.3	Table 6 (guidance on the calculation of performance...) - what is the meaning of this scoring/calculation? Is it meant to be communicated on each product?	Table 45 describes how the decrease of performance level is calculated for all key product parameters under consideration. This is important for the description of technologies of textile apparel reported from line 3000 to line 3006.

ID	Question	Answer
1.4	What are the product category definitions?	<p>The working document does not report definition of the product categories. Table 44 reports the category description with the list of products included in the category. If stakeholders consider that a definition for each category would improve the understanding of the text, they are invited to provide a definition based on the list of products included in the category.</p> <p>During the 1st consultation, the JRC asked stakeholders about the definition of products categories, but no proposals were received. Please, consult the document “Comments to the working document of the 1st milestone and answers from the JRC” in the section on scope.</p>
1.5	How the use of recycled content has been considered in developing the durability framework?	<p>Recycled content was not considered because what is provided here is a description of products currently available on the EU market (see lines 62-64). Nowadays, the amount of recycled fibres is very small (see lines 1326-1334). This means that apparel with recycled content are negligible compared to the total products placed on the EU market. Please, see section 9.2.5, which addresses recycled content.</p>

2. Table 5

ID	Question	Answer
2.1	Is the “value of the new item” in Table 5 a minimum requirement for compliance that new products must meet, or is it merely a performance reference?	<p>The value of new item refers to the minimum performances currently met by items that are ready to be purchased by the consumers.</p>
2.2	Is the idea that the products shall be tested for the key test parameters mentioned both before and after multiple washing/drying cycles? This adds to the issue with lead time and lab capacity. Physical tests are usually performed on a product or fabric before it has been washed (except for of course test connected to the wash performance such as dimensional stability and appearance).	<p>Yes, the physical durability of a product is proposed to be assessed before and after a number of cleaning cycles.</p> <p>Section 9.2.1.3 describes how to assess the physical durability. The five steps reported in lines 2886-2891 include:</p> <p><i>“2. Identification of the characteristics of a new item,</i> <i>3. Simulation of the aging process,</i> <i>4. Assessment of the effects of the aging process,”</i></p> <p>Line 2940 reports the following: <i>“When measuring the characteristics of the new product, the tests addressing dimensional change and visual inspection need to be run after 1 cleaning cycle.”</i></p> <p>The stakeholders are invited to further substantiate their concerns about lead time and laboratory capacity.</p>

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2.3	On p.20 it says “The tests addressing dimensional stability and visual inspection need to be run after 1 cleaning cycle” - does this mean that dimensional stability and appearance after wash should be assessed after 1 cleaning cycle only?	<p>The text the stakeholder is quoting was revised in the final draft of the working document. Line 2940 specifies: “<i>When measuring the characteristics of the new product, the tests addressing dimensional change and visual inspection need to be run after 1 cleaning cycle.</i>”</p> <p>As reported in lines 2886-2891 and Tables 44 and 45, all key parameters are assessed before and after the simulation of the ageing process.</p>
2.4	Are the thresholds in this table suggested as market access requirements for all products? For ‘new products’ only?	<p>Table 44 does not report criteria for minimum requirements for accessing the market. Table 44 is included in section 9.2.1.3, which describes how to assess physical durability of the products in the scope. This analysis is included in the Task 4 of the MEErP, which only describes product technologies (see lines 62-64, and 2518-2538).</p> <p>Design options with potential market access values will be discussed in Task 6 (see lines 70-73).</p>
2.5	Is Table 5 based on the approach that all types of fabrics (no matter the fibre composition, fabric construction, fabric weight, dyeing method etc) shall be able to meet mentioned thresholds? What data and experience were the thresholds based on and is that data or experience reflecting a wide variety of fabrics?	<p>Table 44 is included in the methodology to assess physical durability of products in the scope. Lines 2887-2891 reports the steps of this methodology, which includes the grouping of products with homogeneous characteristics. Furthermore, lines 2917-2922 describe the criteria used to describe separately product categories.</p> <p>Lines 2897-2900 specify that characteristics of the new item were chosen to be fibre-neutral and based on the long technical experience of AITEX testing numerous items. The suggested values are based on expert judgement rather than a specific set of tests run on a sample of products.</p> <p>During the consultation on the 2nd milestone, the JRC welcomes any additional data and knowledge to complement the current understanding of the description of the products in the scope.</p>
2.6	For denim category: why should tensile strength test be done at seam in “transversal” (i.e. weft) direction?	<p>The current proposal consider longitudinal and transversal tensile strength test. Stakeholders are invited to contribute to the working document on the 2nd milestone arguing their position and providing knowledge relevant to this specific parameter.</p>

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2.7	How will the thresholds approach fabrics with special construction such as broderie anglaise - should it be tested in the same way as other woven fabrics even if the fabric construction naturally has weaker areas (holes)?	Broderie anglaise is currently not included in the assessment. If stakeholders consider that it requires to be addressed with a specific category, they are invited to propose new category(ies) for this specific fabric construction. The proposal should include all elements reported in Table 44 in terms of (1) products included in the category, (2) key parameter(s), (3) test method(s), (4) characteristics of the new product, (5) simulation of the ageing process. The introduction of a new category should be justified by data on the market share of products included in the category.
2.8	What is the reason for having abrasion resistance requirements for shirts, blouses and dresses but not for trousers, shorts & skirts? We believe it would be more relevant to focus on having it only for trouser category.	Lines 2892-2896 describe the selection of the key parameters. Lines 2923-2934 describe the principle of economy used in the identification of key parameter for all product categories. If stakeholders have a different point of view, they are invited to contribute to the working document on the 2 nd milestone providing specific suggestions and arguments supporting their position.
2.9	Why has seam strength test been chosen instead of seam slippage test for woven product categories?	Lines 2892-2896 describe the selection of the key parameters. Lines 2923-2934 describe the principle of economy used in the identification of key parameter for all product categories. If stakeholders have a different point of view, they are invited to contribute to the working document on the 2 nd milestone providing specific suggestions and arguments supporting their position.
2.10	Product categories 8,9 & 10: why do they have a dimensional stability threshold of +/-3% when the categories can include both knitted and woven products?	Lines 2892-2896 describe the selection of the key parameters. Lines 2923-2934 describe the principle of economy used in the identification of key parameter for all product categories. If stakeholders have a different point of view, they are invited to contribute to the working document on the 2 nd milestone providing specific suggestions and arguments supporting their position.
2.11	How will products with “dry clean only” care instruction be tested?	For category 7, Table 44 reports that simulation of the aging process follows either ISO 6330 (washing machine) or following ISO 3175-2 (dry cleaning), according to directions reported on the label.
2.12	Is ironing included as a step after washing and drying?	Ironing as component of the ageing process is not included. The reasoning behind this choice is provided in lines 2901-2916.
2.13	ISO 15487: “Trimming aspect” - which clause in the standard do you refer to for the grading? It says 5-step grading system but component evaluation under clause 7.4 Appearance assessment (qualitative method) is a 3-step grading system (1,3,5).	Line 2937 reports that Table 128 describes all standardised test methods proposed in the framework. Table 128 describes the type of result obtained and the grading scale.

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2.14	CF to Chlorinated Water (ISO 105-E03): which concentration of chlorine?	This information is missing in the text. Stakeholders are invited to contribute to the working document on the 2nd milestone providing suggestions and arguments on the specific chlorine concentration to be used.
2.15	CF to Chlorinated Water (ISO 105-E03) and CF to Sea Water (ISO 105-E02): is min. Grade 4 referring to req. for colour change, or what? Grade 4 for colour change will be difficult to meet for all types of colours/dyes used for swimwear, such as neon colours.	<p>The JRC understands that the stakeholder refers to the characteristics of the new product in the category number 10 of swimwear. In the description of this product category the Grade 4 is proposed as minimum characteristic of the new product. Table 128 describes for ISO 105-E03 and ISO 105-E02 the Grade 4 as “Good colour fastness”. This is already a level lower to Grade 5: Excellent colour fastness.</p> <p>Lines 2981 and 2982 refer to values adopted for the sea water and chlorinated water in a larger discussion on characteristics of new products reported in lines 2970-2986.</p> <p>Stakeholders are invited to provide suggestions and arguments for the adoption of different values for different colours when addressing the characteristics of the new items.</p>
2.16	Elasticity of fabric (ISO 20932-3): does the requirement only apply to elastic trims/straps and such?	<p>Table 44 reports the key parameter of “Elasticity of fabric” only for the product category number 10 including swimwear. The characteristics of the new product consider only feminine items.</p> <p>Table 128 describes the ISO 20932-3:2018 and its application to the fabric.</p>
2.17	Hosiery category: is this meant to be required for all types of socks, stockings, tights etc, even the very thin microfibre ones in for example 15 Denier?	Table 44 in category 8 lists hosiery as “leggings, stockings, tights and socks”. This category is meant to address all the tights.
2.18	Product categories: (a) Which product category does knit trousers, shorts and skirts fall under? In the table trousers are only mentioned generally and the test methods for those are only relevant for woven category.	<p>Table 44 describes trousers, shorts and skirts, excluding denim in category 1 with specific test methods. If stakeholders consider that the proposal is not suitable to describe these products, they are invited to contribute to the working document on the 2nd milestone and provide their suggestions. The proposal should include all elements reported in Table 44 in terms of (1) products included in the category, (2) key parameter(s), (3) test method(s), (4) characteristics of the new product, (5) simulation of the ageing process.</p> <p>The introduction of a new category should be justified by data on the market share of products included in the category, e.g. the % of knitted trousers and % of woven trousers on the EU market.</p>

ID	Question	Answer
2.19	Why are not all product categories mentioned under the denim category? Would be relevant to add for all categories to include jackets, dresses etc.	Based on the key parameter used, the authors considered that trousers with denim fabric need to be addressed by a specific category. This does not apply to the other categories because shirts, dresses and jackets made with denim fabric can be described by the same key parameters and values as those made of another fabric. The authors understand that the denim fabric used in the shirts is not the same denim fabric used in trousers. Therefore, distinction is only relevant for trousers, shorts and skirts, but not when used in other categories.
2.20	Why are shirts differentiated from blouses & woven dresses? What is your definition of a shirt vs a blouse?	The reasoning behind the categorization of products is reported in lines 2917-2922. During the 1 st consultation, the JRC asked stakeholders about the definition of product categories, but no proposals were received. Please, consult the document " Comments to the working document of the 1st milestone and answers from the JRC " in the section on the scope. It would be very helpful if stakeholders concerned could suggest in this consultation the definition of all products addressed by the scope, including for shirts and blouses.
2.21	Which product category does underwear tops/bras fall under?	Table 44 does not include these products. Stakeholders are invited to contribute to the consultation on the 2 nd milestone and propose a category to address these products.
2.22	How is sportswear/performance wear tested compared to regular clothes? If it's not further defined, does it provide loopholes?	The preparatory study currently does not distinguish leisurewear from sportswear and workwear. This is reported in section 3.2.1. In particular, lines 438 and 439 report: <i>"Nevertheless, this approach on workwear and sportswear will be reassessed when the PS addresses task 6 of the MEErP on ecodesign options."</i> The JRC would warmly welcome proposals by stakeholders containing a list of technical characteristics that would enable objectively distinguishing leisurewear from sportswear and workwear.