

EU Ecolabel for textile products: Stakeholder table of comments - scope definition					11/06/2013 v1
Reference	Criteria or subject	Aggregated theme	Summary of comments	JRC-IPTS response	Addressed, rejected or modified?
Article 1	Cleaning products	Exclusion of cleaning products	Concern was raised about the exclusion of cleaning products from the scope. A number of cleaning products are currently licensed. Current fitness for use criteria relating to washing resistance could be applied.	Cleaning products carry out specific functions to which specific fitness for use criteria would apply. A review of the Nordic Swan criteria for fabric cleaning products, which has four criteria, confirms this. This would require reference to specific additional testing standards, some of which are not well defined in the Nordic Swan.	Rejected - Subject to the position of the EUEB. The textile fabric could be ecolabelled.
	Scope definition	Maintain flexibility in the scope definition for clothing, accessories and interior textiles	The examples of products listed should not be exhaustive or restrictive but should serve as examples for Competent Bodies and applicants.	The criteria text is to be amended accordingly.	Accepted
		Maintain flexibility in the scope definition for clothing, accessories and interior textiles	The examples of products listed should not be exhaustive or restrictive but should serve as examples for Competent Bodies and applicants.	The criteria text is to be amended accordingly.	Accepted
Article 2	Excluded fibres	Re-introduce the clause allowing fibre for which no fibre-specific criteria are set	Without this clause a number of different types of fibres that may be relevant to GPP would be excluded such as aramid fibres.	This clause was deleted earlier in the revision process because of a consensus view that it would allow fibres with no environmental criteria to be used in an Ecolabelled product. This was not a position that could be accepted. Moreover LCA evidence was not forthcoming for technical fibres such as aramid.	Rejected - Additional fibres will be addressed within the scope of GPP
		Re-introduce the clause allowing fibre for which no fibre-specific criteria are set	Without this clause a number of different types of fibres that may be relevant to GPP would be excluded such as aramid fibres.	This clause was deleted earlier in the revision process because of a consensus view that it would allow fibres with no environmental criteria to be used in an Ecolabelled product. This was not a position that could be accepted. Moreover LCA evidence was not forthcoming for technical fibres such as aramid.	Rejected - Additional fibres will be addressed within the scope of GPP
Article 3	Reference to standards	Ensure that references to standards are generic	National references and the publication date should be omitted from EN or ISO standard references so as to avoid obsolescence. Reference should instead be made to the more recent published version.	EN and ISO references will be checked in line with the comments made.	Accepted
	Laboratory certification	Require EN ISO 17075 for testing laboratories	Without this requirement there would be a disincentive for certification.	It is the position of DG ENV and the EUEB that this cannot be required because it would restrict access to laboratories. A wording is used that requires instead general or equivalent compliance. This would permit in-house testing.	Modified - General or equivalent compliance is required
	Testing equivalence	Test method equivalence can lead to inconsistency	If equivalence was to be accepted then this could lead to inconsistent verification by Competent Bodies.	As far as possible test methods shall be specified according to an EN or ISO standard, or a specific analytical technique.	Accepted

	Equivalency with other labels	Acceptance of equivalent Type I Ecolabels	This would lead to problems as it is difficult to assess the equivalence of all aspects of another ecolabel. Moreover, how would this be maintained if a labelling scheme changes its criteria during a validity period.	The aim of proposing equivalence was to minimise the additional burden for applicants. However, where possible references will be removed to refer only to the underlying criteria requirements which could be fulfilled by other ecolabels. In some more specific cases	Modified - Where possible reference is made to the use of test data from other labels. In some cases where the schemes have been evaluated it is still felt to be important e.g. cotton traceability, IPM cotton.
		Maximum threshold for membranes and coatings	Synthetic material not covered within the scope of the criteria requires further consideration. The Nordic Swan sets thresholds for membranes and coatings of 20%. All of other materials could be set at a limit of 15%.	The Regulation (EC) 1007/2011 on textile fibre names and related labelling and marking of the fibre composition of textile products is based on a threshold of 80% textile content. It therefore seems appropriate to align the criteria with this threshold. This would restrict the content by weight of other materials such as membranes and coatings to less than 20%, in-line with stakeholder proposals.	Accepted by amending the overall minimum textile content.
		Conformance of certification systems with ISO/IEC Guide 65	It was considered challenging and difficult for Competent Bodies to verify this requirement to the level stated in the proposal. A simple declaration would be the best option. It would be easy to check the status of the certification body as it will be written on any certification issued by a scheme. It was stated that the ISO/IEC Guide 65 has been replaced by a new ISO standard 17065.	A less strict reference has been proposed whereby certification bodies should <i>reflect as far as possible the guidance in EN 45011 and ISO 17065</i> . Accreditation and certification according to these systems is important in order to ensure that schemes provide a high and consistent level of assurance.	Modified - General equivalence is expected

EU Ecolabel for textile products: Stakeholder table of comments - fibre criteria					11/06/2013 v1
Reference	Criteria or subject	Aggregated theme	Summary of comments	JRC-IPTS response	Accepted, rejected or modified?
Pre-amble	Fibre scope	Criteria for silk	It was queried as to why silk does not have criteria. It is becoming more important for high quality products in combination with other fibres.	Given the absence of an LCA evidence base for the environmental impact of silk it is proposed to exclude silk from this revision. Early indications from the Oxford Biomaterials study (UK, commencing Spring 2013) are that a criteria would be required because of the potential for very high embodied energy. It is understood that upon the time of the next revision full LCA evidence following the PEF methodology should be available.	Rejected - Silk is not to be included within the Ecolabel
		Criteria for aramid fibres	It was also queried as to why aramid fibre, which typically has applications such as fire service and military, should not be included.	Given the lack of an LCA evidence base for the environmental impact of aramid fibres it is proposed to exclude this type of fibre from the revision. Global production in 2009 amounted to just 64,000 tonnes, dominated largely by Dupont (USA) and Teijin (Japan), so their market significance is very limited.	Rejected - Aramid is not to be included within the Ecolabel
	Complex products	Market barrier to the labelling of complex products	It was noted by one stakeholder that the 85% threshold for compliance with the fibre criteria is a barrier to more complex products such as suits becoming ecolabelled. Typically linings and paddings cannot currently be commercially sourced to meet the Ecolabel's specifications.	Components such as linings and paddings that might amount to less than 20-25% of the garment weight are not generally commercially available to Ecolabel specifications. Filling materials are more readily available in a high recycled content specification. Cellulose acetate, which is commonly used for suit linings is a commodity fibre product. It is therefore proposed to exclude padding from having to meet the fibre criteria and, because it should be easier for the remaining balance of fibres to comply, to remove the reference to an 85% threshold.	Paddings - To be excluded. Removal of 85% threshold. Fillings and linings shall comply with fibre criteria.
	Reference to recycled fibres	Exception for fibres with recycled content	The definition of recycled fibres should be clarified to recognise that fibres and their feedstocks may be obtained from a range of different sources, textile or otherwise.	The text in the introduction to the fibre criteria has been amended accordingly.	Accepted
1. Cotton	Market analysis	Availability of different deniers of cotton	The availability of cotton does not mean that it is available for all types of products since different yarn characteristics are required.	It is understood that the organic and (certified) IPM cotton markets have been driven by manufacturer/retail demands. No feedback has been received from stakeholders detailing specific barriers related to yarn characteristics. Moreover, a flexible approach to cotton content is now proposed, which should allow applicants to respond to market availability.	The new proposal builds in market flexibility
	1a-c Production standards	Application of pesticide testing	The remaining balance of cotton should be tested for pesticides and/or should be IPM or transitional cotton.	Consultation with cotton experts strongly suggests that pesticide testing of the cotton boll is not an effective method for determining specific pesticide use/non-use. Pesticide restrictions can only have scientific value if they are supported by stronger verification. Farmer/producer group declarations are therefore proposed. A strengthened requirement is proposed as an alternative to organic or IPM certification. However it has not been possible to determine the current market availability of cotton	Modified - Proposal for strengthened verification for pesticide restrictions.

		Setting of minimum cotton content standard	A methodology should be provided for where applicants wish to combine organic and IPM cotton.	In general evidence suggests that manufacturers and retailers are pursuing strategies based on either organic or IPM cotton. A simplified approach is proposed based on a minimum content that could be met by verifying organic, IPM or declaration-based pesticide restrictions. A weighting could be considered if requested (e.g. 1 unity IPM = 2 units organic)	Modified - A flexible standard with a minimum 50% content is proposed.
			The requirements that shall apply to the remaining proportion of the cotton shall be clarified.	It is not proposed to apply a requirement to the remaining proportion of the cotton as strengthened pesticide restrictions are proposed as an alternative option to organic or IPM cotton.	Modified - Proposal for strengthened verification for pesticide restrictions.
			The use of recycled cotton is environmentally preferable to organic or IPM cotton.	An incentive is included within the pre-amble where recycled content is greater than 70%. However, limited verified evidence could be found to confirm the life cycle benefits of recycled cotton fibre and yarn.	An incentive exists for recycled content
		Verification of minimum cotton content standards	Should a product's content be verified on an annual or a product basis?	Verification on a product basis may be more relevant to consumer goods, where content claims are valued. An annual basis may be more appropriate for commercial textiles. To encourage the widest possible number of applications both forms of verification are proposed. Verification shall be by production line.	Clarified - Both forms of verification are to be accepted.
	1b IPM production standard	Application of pesticide testing	A threshold for pesticides is specified despite a requirement that the listed substances shall not be used. Does an IPM scheme exist that allows the use of any of these substances?	Not all of the listed pesticides are WHO Class Ia or b. In the case of BMP there are no specific restrictions. Farmers within the schemes may therefore use listed pesticides. This, together with the potential for cross-contamination, is understood to make the threshold limit still valid.	Rejected, the criteria is based on testing, with the potential for cross-contamination.
		Concern about the market impact of IPM cotton on Organic cotton	The market share of IPM is surprisingly high - has it grown since 2006?	The background market share of 20% is all IPM cotton, making it a good fit for the Ecolabel. No data could be found to determine a trend since 2006 but an increased focus globally on the environmental impact of agriculture suggests continued growth is likely.	Commentary only
		Concern about the market impact of IPM cotton on Organic cotton	Concerns were raised that IPM's growth may hinder the development of organic cotton.	Certification of IPM cotton is a new concept and is growing rapidly. It is therefore different from organic cotton in that it is a process of increasing the certification and traceability of a product that is already on the market. It is true that some large brands have switched their focus from organic to IPM but the recent Textile Exchange report (2012) on the organic cotton market identifies this as only one of four factors constraining growth. It is also the case that for brands and consumers organic is a much clearer and effective branding than IPM and a number of the major brands such as H&M are still committed to significant growth.	Modified, IPM is considered to be a good fit for the Ecolabel. A flexible approach is proposed.
		Concern about the practicality of the transition for existing licenseholders	Switching over to 50% IPM content could present significant production and supply chain challenges.	The introduction of stronger environmental criteria for cotton is seen as an important revision. A balance must be struck between bringing along existing licenseholders and attracting new licenseholders. A transitional period will be proposed for existing licenseholders.	Accepted - A flexible approach is proposed, with stronger verification of pesticide restrictions as an alternative to IPM and organic cotton.

		Specification of IPM schemes that will be accepted	Specifying IPM schemes runs the risk of the criteria becoming outdated and not exhaustive.	Given the early stage in the market availability of IPM certifications it is felt to be important to highlight credible schemes/programmes. Stakeholders clearly requested guidance of credible schemes/programmes. Update recommendations could be provided in the User Manual.	Rejected, updates could be provided in the User Manual.
		Specification of IPM schemes that will be accepted	The Australian BMP programme is evaluated as worse in relation to pesticide restrictions	Australian cotton is evaluated by ICAC as having one of the highest yields and the lowest unit consumption of WHO Class I pesticides on the global market (SEEP 2010). Evidence suggests that the environmental benefit from IPM has the potential to be equal or greater than pesticide restrictions.	Modified, the pesticide restriction could be requested for BMP
	1c Organic standard	Setting of a minimum organic cotton content standard	The organic cotton minimum content is not ambitious enough and should be at least 70%	Production of organic cotton whilst being demand driven declined in 2012, accounting for just under 1% global production and an estimated 2-3% of the EU market. Whilst the strategy which has driven demand is based on high content levels a similar requirement could lock-out potential applicants from the Ecolabel.	Rejected, a flexible standard with a minimum 50% content is proposed.
		Setting of minimum cotton content standard	The organic cotton minimum content is too ambitious due to the limited market availability.	The growth of organic cotton to date has been driven by demand from brands and retailers. It is therefore important to sustain demand, which has largely been in the form of products with a high content which can be communicated to consumers. Making it a requirement would, however, have the potential to lock potential applicants out of the Ecolabel.	Modified - A flexible approach is proposed with organic cotton being one route to comply.
		Information should be provided about what can be claimed on the Ecolabel	Information about what claims can be made for different levels of content should be provided e.g. minimum level of content to claim an organic cotton product.	A table of claims based on different levels of content is proposed and has been added to the criteria dealing with information on the Ecolabel.	Accepted - see criteria 27
	1d Traceability	Concern about the cost and systems for traceability	There are limited tools on the market supporting traceability between suppliers. The issue is only address for cotton but not for wool and recycled content fibres.	It is accepted that there are appear to be limited tools on the market, however, this issue has been raised as a major area of concern and reputational risk for the Ecolabel. Those that do exist appear to provide a high level of assurance. The best example is the EU organic certification system which the cotton criteria seeks to emulate. Systems operated by the Textile Exchange and Fair Trade are also considered to provide assurance. These systems are therefore referred to specifically in the verification for the traceability sub-criteria. Traceability is required for fibres with recycled content, but a generic clause should be added.	Accepted, with an approach based on acceptance of leading systems. A generic clause is needed for any other recycled fibres.
3. Greasy wool	3a Ectoparasiticide restrictions	Acceptance of organic certifications	Different organic wool regulations could allow the use of different ectoparasiticide groups. Analysis would be required from country to country.	The reference to organic certification as a compliance route for the ectoparasiticide restrictions has been removed because of the issue highlighted.	Accepted

		Proposal to derogate wool scouring operations that evaporate their effluent and eliminate ectoparasiticides	A wool scourer evaporates their effluent, effectively resulting in zero discharges, concentrating the ectoparasiticides in a sludge that is either incinerated or digested anaerobically.	The philosophy of the criteria is to reduce ectoparasiticide application to animals at source, with resulting reductions in diffuse pollution and related to their manufacture. The main source of environmental impact is, however, understood to relate to ectoparasiticides that are released into wool scouring effluent. If the derogation is to be accepted then the wool scourer should demonstrate a high level of resource efficiency, with reference to criteria 3(c)	Modified - It is proposed that such wool scourers meet a minimum of two measures from criteria 3c
		Proposed sampling and testing approach	The proposed approach will be expensive for plants processing large tonnages of wool e.g. 100t per day greasy wool.	The approach in the original criteria was not felt to provide a high level of assurance, particularly in terms of sample frequency. Some industry stakeholders and licenseholders argued for testing of all sales lots to provide assurance. An approach based on composite sampling for sales lots was agreed to be a cost effective means of increasing the sampling.	Rejected - the proposal is a balance between assurance and sample frequency
	3b COD from wastewater	COD cut-off by fibre	What is the rationale and cut-off for coarse and fine wool?	The textile BREF makes a clear differentiation between the two grades of wool. A cut-off of 24.5 microns is proposed based on Australian wool classifications, and in alignment with the textile BREF.	Rejected
		COD requirements for wastewater discharges	The only relevant measurement should be discharges to the environment.	The measurement of COD from wool scouring processes was intended to encourage the cleaning of wool at source, thereby reducing the need for wastewater treatment plant. There is, however, uncertainty as to how selective these targets would have been and the balance of energy saving from reduced wastewater treatment.	Accepted
			A target of 20g/kg is readily achievable by modern scourers and in many cases will be dictated by local trade waste costs and environmental legislation. A target of 45g/kg could be accepted.	45 and 25g/kg are based on reductions in COD of 75% by coarse and fine wool scourers. 45g/kg would allow scours achieving a high level of dirt and grease removal followed by secondary municipal wastewater treatment to comply.	Accepted
	3c Resource efficiency	Resource efficiency measures using waste streams	The potential to comply will depend on investment, location and end-market. Scours should be requested to identify/consider measures.	Resource efficiency is a key area of EU policy and an area of improvement potential for wool scours, which can produce multiple waste streams. The criteria is flexible, including a number of different measures, which should ensure that sufficient scours can comply. Ecolabel criteria must be based on implementation of specific measures.	Rejected, resource efficiency is a key EU policy aim and area of environmental improvement potential
5. Elastane	5b DMAc limit values	DMAc limit value and test method	The criteria and derogation conditions are not consistent with the 0.1% SVHC limit. The test method requires revision.	The derogation conditions apply to the final textile product and as such the concentration limits established are below the 0.1% threshold. The concentration on raw fibres can be 0.1 - 0.5%, with acrylic able to meet 0.1%. This concentration is reduced after wet processing to 0.001 - 0.005%. The test method has been revised accordingly.	Modified - reference to the fibre concentration has been deleted, with reference only to final fibre concentration.
6. Polyamide	6b Adipic acid	Uncertainty relating to feedstock emissions data	Given uncertainty about verified data the current criteria should be maintained until verified values become available.	It is considered important to retain an alternative criteria to recycling that relates to the monomer, as we have now made recycled content optional (as also for polyester). Adipic acid was identified by as being the most significant N2O source for nylon 6,6. The adipic acid criterion is derived from verifiable CDM/JI emissions data for adipic acid production sites globally and based on the installation of abatement technology (Stockholm Environment Institute 2010/IPCC guidance).	Rejected - the data is considered to be verifiable

6. Polyamide and 7. Polyester	Recycled content	Alternatives to recycled content	Whilst recycled content is considered to be important alternative improvement options should also be considered as criterion.	LCA evidence shows that recycled content delivers significant life cycle improvements along the life cycle of polyester and polyamide fibres. Alternative options should be capable of delivering similar improvements. Actions such as ISO 50001 are not able to deliver specific defined improvements to the fibre life cycle. It is proposed that existing feedstock/process related sub-criteria become alternative options.	Modified - Proposed existing feedstock and/or process sub-criteria become alternative options
	Recycled content derogations	Derogation of recycled content requirements	Derogations are proposed where specific conditions set by legislation or internationally recognised standards cannot be met and/or where there is proven evidence that quality specifications cannot be met.	The clause is accepted, being supported by manufacturers feedback. Competent Bodies expressed concern with regards to verification of the more open clause relating to quality specifications. The clause may not be required if recycled content is made optional for commercial textiles.	Accepted
			Derogations can only be illustrative as otherwise they would be too limiting.	The derogations will need to be as specific as possible to ensure consistency of verification. The quality-related derogation was intended to support existing licenseholders only, no feedback was received from consumer textile licenseholders. Broad headings for possible quality issues that may arise shall be defined.	Modified - Quality themes to be defined for existing applicants.
7. Polyester	7c Recycled content	Derogation of recycled content requirements	Assessment and verification is not possible for the proposed derogations	The derogations were intended to assist with the transition for existing licenseholders. It is proposed that recycled content is optional for commercial/publicly procured products. This avoids the need for complex derogation procedures.	Accepted
		Derogation of recycled content requirements	The derogations should be clearer and may require specialist technical knowledge	It has been difficult to put more detail on the derogations due to limited industry feedback with specifics. They also are intended to be open ended for existing licenseholders and for public procurement as we cannot foresee all the specific issues that may arise.	Modified - Specific themes to be defined for commercial and public products
			The cost and time required to test existing ecolabelled product lines will be significant	The barriers stated are accepted but it was felt at the time that derogating existing licenseholders would not send out the correct market signal. A proposal to require a proportion of product lines to make the transition was discussed at AHWG3 but was not felt to be practical. It is proposed that for commercial textiles recycled content becomes optional, allowing for existing licenseholders to make the transition if they wish. This position is proposed to change at the time of the next revision, allowing sufficient time to explore the quality implications and develop new lines.	Accepted - Recycled content to be optional
9. Man-made cellulose	9a Sustainable timber	Certified and legal pulp minimum content	The minimum requirement should be 50%, reflecting copying and graphic paper.	Dissolving pulp is a specialist grade of pulp and consultation with stakeholders confirmed that it is currently more difficult to obtain certified dissolving pulp on the world market.	Rejected
	9b Legal sourcing	Certified and legal pulp minimum content	The new EU Timber Regulation means that a requirement is not needed	It is understood that the enforcement of strict requirements based on certifications will only apply to new products placed on the market. For all other products only traceability is required. Moreover, not all possible sources of timber may be covered by FLEGT licenses.	Rejected - the requirement provides assurance for ecolabelled products

	9c OX in fibres	OX in fibres or AOX in wastewater?	AOX in wastewater should also be considered. Not all manufacturers measure OX in fibre. AOX would allow pulp manufacturers to verify ECF bleaching. 0.15 kg/ADT is proposed.	The OX limit value can only be achieved by 'ECF light' bleaching sequences. These are understood from the BREF and technical literature to minimise the potential for the formation of dioxins and other chlorinate compounds. AOX would offer an alternative verification route, but could only be accepted if broad equivalence can be determined with the OX limit value.	Modified - AOX shall be added if equivalence can be found with OX limit value.
	9e Sulphide emissions to air	BREF emissions values	The BREF emission value ranges should be accepted for all production technologies	All three viscose fibre production technologies are covered. The filament fibre limit values would, for integrated washing processes, represent an increase in the limit value from 120g/kg to 170-220g/kg. It is understood that for batch filament fibre processes the lower end figure of 40g/kg is readily achievable (see Technical Report, February 2012).	Modified - Acceptance of staple fibre range, lower end of range is proposed for filament fibre
	9f Emissions to water	Broadening of final effluent requirements	AOX, COD and sulphide in wastewater should be considered. Restrictions on OX in fibre and sulphide in air emissions do not ensure low wastewater content.	it is understood from industry stakeholders and scientific literature that fibre OX is an indicator of whether chlorine bleaching sequences have been used and therefore also the presence of AOX in wastewater. Sulphide emissions to air are identified as being of more significance than wastewater emissions according to LCA findings (Shen and Patel 2010)	
	Pulp and paper products	Justification for differences with pulp for paper products	These should be mentioned and justified in the Technical Report.	Dissolving pulp is a specialist grade of pulp used to manufacture viscose fibres. This is reflected in the availability of certified pulp. An LCA study for viscose prioritised forestry, on-site energy/co-product recovery and sulphide emissions. Targets set on COD/TOC would not necessarily encourage energy recovery. Simplified and easy to verify criteria have been developed. Industry has commented and been involved in this process throughout.	Clarification

EU Ecolabel for textile products: Stakeholder table of comments - chemicals and process criteria					11/06/2013 v1
Reference	Criteria or subject	Aggregated theme	Summary of comments	JRC-IPTS response	Accepted, rejected or modified?
Pre-amble	Recycled fibres	Traceability should be ensured for SVHC's	Given the potential for skin contact the product should guarantee the absence of SVHC's. Supplier declarations of testing should be used.	Verification for recycled materials is supported by proposed EU end-of-waste criteria for secondary materials. A balance should be struck between traceability and incentivising recycling. Recycled content will tend not to be homogenous in its source. Recycled textile fibres will have been subject to wash cycles, significantly reducing the potential for migration of chemicals. Homogenous feedstock sources with to which known product safety standards apply could be derogated e.g. PET bottles.	Modified - General approach to be adopted with derogation of known feedstock sources
		Acceptability of the recycled fibre exclusion from hazardous substance restrictions	The clause accepting that recycled fibres may contain substances restricted by the criteria contradicts the sense of the RSL/hazardous substance criteria.	It is proposed to delete the clause and to only make derogations where there is knowledge of the risks being managed for known feedstocks.	Accepted - clause to be deleted
13. Restricted Substance List	Assessment and verification	Supplier declarations are more realistic than SDS	Most of the substances specified in the RSL will only be present below 0.1%. It is proposed to base compliance on supplier declarations.	Accepted, however, where possible SD and/or analytical testing should be requested as supporting evidence of the main ingredients of chemical formulations and recipes.	Modified - Declarations supported by SDS where possible
		Poor/incomplete SDS	How would poor or incomplete SDS be assessed? This is a task for experts.	Consultation with Competent Bodies suggest that this clause should be retained as SDS should contain certain consistent information and it is normally apparent if they are incomplete.	Clarification
		Determination of need for risk-based testing.	Annex 2 provides some indications clear and transparent rules are required.	The approach has been revised. The areas of risk are now reflected in the RSL where product testing is specified for the most significant risks.	Accepted - The risks have been integrated into the RSL.
		Substances shall not be contained in the final product	This clause has the potential to create legal problems because analytical testing has advanced to the stage that traces may still be found. A general limit value of 0.1% is proposed instead.	It is understood that the trace limit value will tend to depend on the substance. Testing is only to be carried out on a risk basis so in these cases a trace limit value is specified. A general limit value could, however, be proposed which could be referred to if verification of non-use is required.	To be discussed further with CB's
		SVHC testing	Who shall decide which test method is to be used?	Reference to test methods has been removed and replaced by a requirement for a declaration supported by screening documentation.	Modification

	Biocides restriction	Biocides should be permitted	The market requests biocidal properties. Their use should be permitted as long as legal requirements are fulfilled.	The previous criteria carry a restriction on the use of biocides in Ecolabelled textiles and to date there has been no request for this position to change.	Rejected, subject to EUEB opinion
		Biocides test method	The test method(s) for biocides used in transport and storage is not appropriate. The test methods must be differentiated.	Declarations by suppliers and/or shippers is proposed instead of testing.	Modified
	Candidate List substances	SVHC screening	The clause requiring the screening of the product for Candidate List substances is not required because this conformance with REACH is required.	Articles 6(6) and 6(7) of the Ecolabel Regulation specifically state that Candidate List substances are not present in the final product. Conformance is required with the standard legal wording for Ecolabel hazardous substance criteria. Enforcement by Member States of this REACH requirement is not understood to be consistent, it is considered that the Ecolabel should therefore demonstrate a high level of assurance.	Rejected
	Communication to the supply chain	Applicability to process stages	The RSL should be communicated to all suppliers and subcontractors relevant to the production process for the product. Laundries are not specifically mentioned.	The process stage to which the substance restrictions apply are now identified in the RSL. Laundries are to be included within the definition of 'finishing'.	Modified - RSL specifies production stages
	Definition of restrictions	Clarity of criteria	The criteria text and RSL text give contradictory messages about whether substances are completely restricted or permitted at certain concentrations.	The RSL contains complete restrictions and restrictions to which limit values apply. These are identified for each substance group. Where product testing is required trace limit values are given for substances that completely restricted.	Clarification
	Final product testing	Frequency of testing	Proposals ranged from random testing twice per year to every second year. The burden of testing was a key concern.	In order to improve the level of assurance and to reflect potential changes in suppliers it is proposed that testing is carried out annually on a random basis. This is a compromise between the different proposals put forward.	Modified - Subject to discussion with Competent Bodies.
	Fluorinated chemicals	Restriction should be based on OECD definitions	It is proposed that OECD definitions of long chain PFCA's are used as the basis for the restriction of PFOS and PFCA families of substances at chain lengths of >C4 and >C6 respectively	The OECD definition would reflect the latest scientific knowledge on the environmental improvement potential for perfluorinated compounds and major shifts in chemistry as a result of the US EPA's stewardship programme. The new C4 and C6 chemistries are currently being adopted by the outdoor clothing industry.	Accepted, subject to further review of evidence relating to the C4 and C6 alternatives

		All perfluorinated and polyfluorinated chemicals should be excluded	Even the new C4 and C6 chemistries are persistent in the environment and more mobile so are a cause for ongoing concern. Alternatives exist on the market already.	Technical reports suggest that C4 and C6 perfluorinated substances are the only water repellents currently able to match the performance of industry standard perfluorinated substances for high performance applications, particularly for synthetic fibres. Whilst a number of new non-fluorinated water repellents have been released in the last 12 months their performance, particularly in relation to dirt/stain repellency, and uptake by the market is uncertain. A complete restriction would significantly restrict the Ecolabels potential in the outdoor clothing market and would not be in line with the Ecolabel Regulation.	Modified - Propose use of C4 and C6 PF chemistry for high performance synthetic fibres only
		Perfluorobutane sulfonate (C4) should be permitted	Perfluorobutane sulfonate (C4) has been shown to be non-bioaccumulative and of a low ecotoxicological hazard.	PFBS is a substitute for water/dirt/stain repellents currently used in the market. It is understood to be being phased in by outdoor clothing manufacturers. Although it does not have a harmonised classification, self-classifications do not indicate that it would be classified with hazards of concern to the Ecolabel. Concern has been expressed by some Member States about the persistency/mobility of short chain compounds these appear to relate to PFCA's. More information is required on potential degradation products.	Accepted - It is a main substitute to provide key functions in high performance outdoor clothing.
		Appropriateness of PFAS and PFCA restrictions	Should the limit value apply to all PFOS substances. The PFCA limit values may be restrictive.	The structure of the restrictions have been changed and is now based on chain length (see other related comments).	Modified - The proposed approach has been changed
	Recognition of other labels	Oeko Tex 100	Oeko Tex 100 is not considered to be a Type I label and is not always transparent.	Specific reference has been removed. It is highlighted instead that equivalent tests carried out for other textile certifications shall be accepted, with the aim of minimising the burden to applicants.	Accepted
			When will the Oeko Tex 100 read across matrix be finalised and how will it be maintained?	Specific reference to Oeko Tex has been removed, however, a read across could still be provided in the User Manual.	Modified - Read across could be maintained for the User Manual?
	Reporting threshold	Use of 0.1% threshold for SVHC's	0.1% is the reporting threshold for SDS but does not represent a safety limit.	0.1% is the reporting threshold for SVHC's that may be present in articles. It is also the derogation threshold referred to in the Ecolabel Regulation for SVHC's	Rejected - Threshold is dictated by legislation
	Risk of impurities in metal parts		There is a real risk of them containing heavy metals, as evidenced by high profile recent cases e.g. >1000 ppm lead in brass buttons in children's wear. Reference should be made to regulatory standards already existing in REACH for lead and cadmium.	Testing for trace metals is proposed to be extended to metal components, with reference to Oeko-Tex 100 test methods	Accepted

	Substance group limit values	NPEO/APEO limit value	Different views were submitted in relation to the sum total limit value. On one hand 50 ppm was seen as very difficult to achieve because, outside of the EU, these substances may be used to clean equipment. On the other hand these are substances of significant concern for this product group and 10 ppm was proposed.	A limit value of 50-100 ppm would represent industry best practice for the restriction of NPEO/APEO's. It is proposed to set the limit value at the low end of this range. This would signal that contamination must be minimised through better operating practices.	Modified - Value to set in mid range of stakeholder proposals.
		Wool AOX	There is information available on which to set AOX values but the AOX species are understood to be of little concern.	The requirements have been modified - a declaration is now all that is required.	
		Fibre and yarn spinning	The term primary spinning should be more clearly defined. It may only be applicable to synthetics following polymer extrusion.		To be confirmed
		Detergents, softeners and complexing agents	Anaerobic biodegradability should be restricted only to detergents with H400 classification.	The final industrial and institutional laundry detergent criteria require that all detergents should be anaerobically biodegradable. The proposal therefore represents an earlier compromise position from the criteria development process.	Rejected
		Detergents, softeners and complexing agents	The DID list is under revision. Other sources may be more up to date. Applicants should not be forced to refer to the DID list.	The wording has been changed to state that the DID list should be a reference point for applicants.	Accepted
14. Hazardous substance substitution	Assessment and verification	Verification by SDS is not practical	It is not practical for manufacturers to obtain SDS to EU specifications from non-EU suppliers. SDS are not required outside of the EU and if they are it is not usually in the extended form set out in the REACH Regulation. The unintended consequence could be false claims.	The minimum requirements are information according to REACH Annex VII. The reference to SDS forms part of all Ecolabel hazardous substance criteria and provides a standardised reference point for the information required. The reference to SDS in the RSL has been modified so that the requirement is for declarations supported where possible by SDS and/or analytical testing.	Modification of RSL verification requirements
		Compliance of SDS with REACH	There is a timeframe during which suppliers can make the transition to REACH Annex II requirements.	Reference is made to REACH registration requirements for substances (Annex VII, 1 tonne threshold) as a minimum requirement. The reference to Annex II requirements on SDS is intended to provide a common reference point for the quality of SDS. New text has been introduced into the criteria with verification options reflecting the differing potential status of substances.	Modified - New verification text has been introduced

	Finishing processes	Definition of 'finishing'	This term should be defined further as in some countries it can only refer to one production stage	A definition is to be provided in the pre-amble to the Decision. Definitions will also be provided for the other substance groups.	Accepted - Definitions to provided for process stages.
	General approach	The rules should follow the Chemicals Task Force	The rules should follow the Chemicals Task Force, inclusive of proposed amendments.	The proposed approach follows the proposals of the Chemical Task Force - notably the use of substance groups, hazard prioritisation and lifecycle derogation conditions.	Accepted
		Reference to H Classifications and R Phrases	The approach is problematic as it makes it difficult to check and may also rely on the producers assessment (self-classification). As far as possible requirements should be states in the restricted substance list.	The reference to H Classifications and R Phrases is a requirement for all Ecolabel product groups. Standard practice has been to have a clear listing of the hazards and derogations. This could be repeated within the RSL, but a separate listing should be retained in the criteria.	To be checked
	H classifications and R phrases	Read across to R Phrases (DSD system)	Hazard classifications that do not have a corresponding risk phrases should be removed from the criteria listing.	The hazard classification listing is a standard list developed by DG ENV and as such must be used for each product.	Rejected
	Substance group derogations	Colour removal from wastewater	This condition should be considered as case to case BAT	The proposal has been modified - for dyes known to have lower fixation rates a BAT technique must be selected from a number of options that maximise fixation/optimize process control and/or minimise wastewater pollution. Colour removal is one BAT option.	Accepted - A list of BAT options are provided.
		Use of hydrogen peroxide bleach	Is hydrogen peroxide bleach permitted? There may be other process chemicals with aquatic hazard classifications and it must be clear if they are permitted or not.	The use of hydrogen peroxide bleach is not restricted by the Ecolabel (see Annex 1, Restriction 2).	Clarification
		Processes to which the criteria applies	A more generic reference should be made to process stages because the substances referred to may be used at other stages.	The criteria is a requirement that relates to the final product only. The derogations relate to substance groups that are understood from scientific evidence to remain on the final product. The criteria will therefore not apply to most process chemicals, apart from those specifically highlighted and/or derogated.	
		Use of flame retardants	The restriction should not be as limiting. Industry standards and public bodies may require their use.	The wording has been modified in order to include public bodies that may wish to specify their use. The proposed approach is a compromise as a number of Member States have requested a complete restriction on their use.	Modified - Accepted for public bodies
15. Process efficiency	Assessment and verification	Requirement for audit of production sites	Site audits would be required and should therefore be mandatory in the criteria document.	It is proposed that compliance is demonstrated by the minimum items of evidence listed, to be independently verified by a site visits.	Accepted

	BAT techniques	Selection criteria for BAT techniques	It is not clear on what basis the BAT techniques were selected. It would be difficult for CB's to verify alternative techniques. The list of techniques should be expanded to reflect the textile BREF and work by the German UBA.	The specific techniques are the result of a comprehensive screening of the BREF document (see September 2012, Product Bureau website, Annex 5.1). The techniques were identified by cross-referencing improvement areas identified by the IMPRO LCA study with the textile BREF supplemented by techniques addressed by the case studies in Annex 5.2 (e.g. NRDC on energy and water use, which have been developed in conjunction with Chinese textile mills). The techniques were mainly selected for their energy savings potential in the production stages highlighted in the IMPRO LCA results. Some of these techniques also deliver combined savings in water and chemical use. Following feedback the proposal has been revised to focus only on washing and drying processes, being generic to many process stages and more easily verified.	Modified - The proposal has been revised to focus on washing and drying efficiency.
		Differentiation by production scale	The distinction based on the size of the company is not needed. Applicants should fulfill the same requirements regardless of size.	The distinction by size was specifically requested by industry stakeholders in order to be in line with the IED Directive.	Rejected
		Transition of existing ecolabelled supply chains	If existing suppliers are unable to comply then this would have consequences for the supply chain and production processes.	The scope of the criteria proposal has been reduced in order to make it more accessible and easier to verify.	Modified - the proposal has been revised.
16.1 Wastewater discharges	Assessment and verification	Time period for measurement of COD	Over what time period and for what production shall this be measured?	Monthly averages for production at the site for the six months preceding the application are proposed. This requirement has also been clarified for wool scouring.	Accepted
	COD limits	COD limit prior to discharge	The COD limit prior to discharge to the environment should be removed. This is because in some countries major investment has been made in centralised wastewater treatment infrastructure e.g. China. On-site works are now used to recover and recycle rinse liquors. Moreover the effectiveness of an 85% reduction will depend on the COD of the wastewater.	The effluent discharge COD limit value has now been removed.	Accepted

	Hard to biodegrade substances	Mineralisation and colour removal	The proposal for 90% mineralisation is considered to be unmeasurable. Colour removal would act to also remove textile auxiliaries. The effectiveness of a % limit value is questioned as it will be dependant on the fixation/exhaustion achieved by the dyeing process.	Case studies and BAT in the textile BREF suggest that 20g COD/kg will achieve a high level of removal of both hardly biodegradable and non biodegradable substances that contribute to COD levels, a separate requirement for mineralisation will therefore be deleted. Colour removal is proposed to be retained as a requirement linked to the derogation of dyes. A percentage reduction in colour has been replaced by absolute values taken from the Blue Angel criteria for textiles. A requirement for salt recycling is also proposed, based on previous comments.	Accepted, with introduction of an absolute measurement of colour removal
	Scope of criteria	Treatment of additional parameters	Additional parameters for inclusion could include copper, nickel, zinc, AOX and ammonium nitrate. These relate to dyeing and printing processes.	It is understood from the textile BREF that 20g COD/kg will be effective in removing hardly biodegradable effluents. It is proposed to include colour removal which is also understood to remove other non-biodegradable auxiliaries.	Modified - Colour removal specified.
16.2 Emissions to air	Scope of criteria	Alignment with VOC Directive	The criteria should be aligned to the VOC Directive 99/13. The current proposal would represent a new approach for the industry.	The approach proposed was based on the textile BREF and is also used by Bluesign, with evidence to successful compliance by the industry. However, following review the criteria have been aligned with provisions for textile finishing contained within the VOC Directive.	Accepted
16.2 Emissions to air	Scope of criteria	Clarify emissions included	Clarification is required of the types of emissions included within the criteria.	The criteria relates to VOC emissions from finishing processes, including thermosetting, thermosoling, coating, impregnating or finishing of textiles and the respective drying facilities.	Clarification

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

24. Durability of function	24a Water and stain repellent function	Appropriateness of 50 wash cycle requirement	Few waterproof garments are washed more than 10 times during their lifespan. A durability of between 5 and 10 wash cycles is proposed. Wear and tear are more significant mechanisms for product failure. Moreover 75 oC would be destructive to most seam sealings. The best test method for water repellents would be Bundesmann combined with laundry cycles.	A report commissioned by the Outdoor Industry Association (November 2012) was consulted in order to refine the performance and test method. The report defines expected performance ratings for a range of performance clothing. Ratings have been introduced for water, dirt and stain repellency relating to specific ISO standards. 20 wash cycles are specified.	Modified - Ratings and wash cycles have been specified based on industry literature. The industrial temperature for water repellents requires reviewing.
		Drying conditions	The drying conditions should be specified as these assist in re-activating the function.	Drying conditions and associated test standards have now been added.	Accepted
	24b Flame retardant function	Performance rating	The function should be retained fully after 50 wash cycles at 75 oC.	The performance requirement has been updated accordingly, together with the appropriate ISO testing standard.	Accepted
			The function should be retained fully after 20 wash cycles at 75 oC.	Stakeholder manufacturers have confirmed that 50 wash cycles is a realistic performance for coatings and additives.	Rejected
		Semi-durable flame retardants	Semi-durable flame retardants would reduce the fire safety performance of interior textile products. Curtains, drapes and upholstery textiles have to be cleaned to remove dust and dirt as they result in poor testing results.	The flame retardant industry proposed the use of semi-durable standards for interior textiles. It is not clear that such products exist on the market that are durable.	Input is requested from FR stakeholders
	24c Easycare function	Reduction in SA performance standard	The performance standard should be reduced to SA-3 so as not to penalise fabrics with a high natural fibre content.	The performance rating has been reduced accordingly, but further input if required to confirm the identified weakness for natural fibres.	Accepted
		Rationale for the criteria	Why is only 10 domestic wash cycles specified for Easycare? This value does not seem to be demanding in the light of possible formaldehyde concentrations.	The rating is understood to represent a very good performance for Easycare based on industry input.	Clarification
		Softness function	Identification of test methods	Softeners may be applied at a number of process stages. There are no qualitative methods that can be used to objectively assess softness.	Softeners are to be deleted because no qualitative test methods could be identified.

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25. ILO Core labour standards	Production sites and processes	EU production sites	European production sites should not be deemed to meet all ILO criteria.	The clause has been deleted.	Accepted
	ILO standard C155	Occupational health and safety	Although the Ecolabel for textiles contains a lot of criteria addressing chemicals this does not cover all industrial risks.	Health and safety has received greater attention as a result of a number of high profile recent incidents at factories supplying major EU brands and retailers.	Accepted - The ILO Standard has been added.
	Social Task Force	Harmonisation with STF results	The criteria proposal should be harmonised with the results of the Social Task Force.	The criteria proposal is to be discussed in the context of the STF at the June EUEB.	To be discussed at the EUEB
	Assessment and verification	Reporting on compliance	How comprehensive should the reports compiled from production sites be? A signed code of conduct could be sufficient enough.	A recent review of social compliance schemes by MADE-BY and discussions at the STF suggest that more rigorous verification would be required to ensure credibility.	Clarification - verification requirements have been strengthened
26. Sandblasting	Mechanical sandblasting processes	Forms of machinery to which it applies	EU textile machinery manufacturers are understood to supply sandblasting equipment that minimises risks to workers. The process is enclosed and fully ventilated.	Brands supporting anti-sandblasting campaigns by organisations such as the Clean Clothes Campaign are moving towards bans on manual and mechanical sandblasting. The use of modern, enclosed processes could, however, be considered for derogation from the criteria.	Consult with Clean Clothes Campaign on possible derogation

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