

# Textile labelling rules (revision)

## Response to call for evidence

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### Background

Consumption Research Norway SIFO is a not-for-profit research institute at Oslo Metropolitan University (OsloMet). For over 25 years, we have contributed to the knowledge of the consumption of clothing, also including many projects about labelling and consumer behaviour. We encourage this important work and want to contribute with our knowledge about textile consumption including products, labelling and consumers. Our goal is to lower the environmental impact of textile consumption and give consumers reliable, understandable, and relevant information. The background document has important goals, but errors can easily occur when they are translated into measures that are being put into practice.

The largest problem concerning clothing and other textiles, leading to environmental impacts, is that too many products are produced, imported, and bought compared to the quantity that European consumers can wear out [1]. This overconsumption of new textiles likely decreases the overall success of circular business models, such as repair, reuse or rental, leading to questionable results in terms of both environmental and financial sustainability: If the import is not reduced drastically, there is no need for more durable products nor longer-lived products. Furthermore, it is difficult to give consumers accurate and reliable information about environmental claims and concerns when the knowledge does not exist and when there is great dissent about the methods for measuring impacts and the facts concerning these [2]. It will therefore likely have adverse consequences to attempt to give «easily accessible and understandable information on durability, energy efficiency, lower microplastic emissions, repair, and end-of-life disposal», and it would not be possible, given the current situation, to manifest the claim that “a positive environmental impact is expected from sustainability and circularity labelling that provides more easily accessible, understandable, and comparable information on the impact of the various products”. Instead, we will in the following contribute to what we, based on our research, will [b]ontribute to “fostering greener consumer practices” and “[b]etter fibre identification”.

### Date of production and brand/producer

It is urgent to introduce mandatory production date labelling on apparel. Most apparel has an identifiable producer, but this labelling should also be mandatory [3]. Dating is important so that consumers can monitor their own consumption and see which clothes from which producer they keep and use for a long time. It will also increase safety (e.g., related to the chemical content of

products), strengthen consumer rights and enable a good EPR system [4]. For research on Duration of Service and the potential to regulate clothing consumption, dating is crucial. It is difficult to develop a fair and research-based comparison of the environmental impacts of apparel without differentiating between that which is used for a short and that which is used for a long time, even for generations. This is the basis for many of the shortcomings of the PEF Category Rules (PEFCR) for the apparel & footwear industry [5], and is also characterising the work with the Ecodesign directive and other important policy measures [2, 6]. Several brands are already dating their products, either through easily readable codes or at least through internal coding systems [3]. We believe that both research on and regulation of consumption will benefit from the immediate introduction of product dating. Furthermore, this will empower the consumer. Dating is the easiest way to offer “easily accessible and understandable information on durability” because it enables the consumer to keep track of their own consumption [5]. In addition, it will give research and regulation easier access to information that can give knowledge about what lasts for or is used for a long time, e.g., based on brands, fibres, design, business model, provided information, spare parts, price, etc.

**Suggestion:** Introduce mandatory labelling of production date (year and season) and brand/producer for all textiles that are imported to and produced in the EU along with the already mandatory care labelling.

### **Durability and repairability**

Textiles are in general repairable [6-8]. The exceptions to this rule are when the textiles contain electronics (e.g., blinking lights) and when the material itself has weaknesses that are difficult to amend, such as pilling, shrinking, or elastane that loses its flexibility. There is a lack of research on the clothes that are being repaired and why, but we know that their value is a deciding factor. The perception of value is affected by both the economic, use, and sentimental values of the product [9]. Most of the repairs are done privately and without monetary compensation. More knowledge is needed to give good advice on repairs or for labelling the products that require professional repairs. Clearer labelling of use properties will make it easier to choose clothing that lasts.

**Suggestion:** Initiate research that provides more knowledge of what is being repaired and why. Work strategically to increase the value of the clothes in the EU and consequently the share that is being repaired. Consider whether clothing that is not repairable should be labelled as such and whether clothing prone to pilling, shrinkage or that loses elasticity should come with a warning or be banned. Labelling can contribute to decreasing these issues, as well as strengthening consumer rights and the right to complain.

### **Fibre labelling**

Current fibre labelling was developed so that consumers would be able to distinguish between natural fibres and the artificial, synthetic imitations of these. We are now faced with other issues that are not resolved by the current labelling system: synthetic materials dominate the market [1, 10, 11]. The production of synthetic textiles is increasing rapidly, and it is expected that the amount regenerated (man-made fibres of natural origin) will increase due to e.g., the desire to recycle cotton and as a new market for cellulose following the decrease of paper usage. The consumers' level of knowledge about synthetic fibres is low, but at the same time their concern about the negative impacts of synthetic fibres when they shed microfibres in use, washing or as non-incinerated waste is

increasing [12]. France has taken the lead in this by labelling textiles that contain plastic. We think it would be a good idea to provide summary labelling in addition to the current, more detailed labelling. However, labelling how much microplastics a textile sheds, is in our view, problematic. For one, there may be differences over time, meaning whether they lose more during the 1<sup>st</sup>, 10<sup>th</sup> or 100<sup>th</sup> wash or during use. Another important aspect is that all plastic/synthetic textiles become microplastic if they break down at a landfill or in nature. This will concern a major share of the textiles in the EU/EEA that are either landfilled in the EU or exported to other parts of the world with inadequate waste management systems.

**Suggestion:** Consider a simple labelling of share of fossil content (plastic) in addition to the detailed fibre content. Another option is to label the three main categories of textiles: synthetic (plastic), man-made from natural materials and natural fibres in % in addition to the detailed fibre content. Further consider whether the use of brand names (e.g., Nylon) should be phased out so that only generic names are used and the labelling is more consistent.

### **Content**

Fibre is only one part of what clothing and other textiles contain. Increasing issues concerning allergies combined with increasing awareness of harmful chemicals, make labelling of other ingredients a pressing matter. A declaration of content similar to food ingredient declarations would be ideal but more realistically, a first step would be to label problematic ingredients/technologies - e.g., defined as those on the REACH list, use of GMOs, nanoparticles, etc.

**Suggestion:** Consider whether content declarations should be developed that include problematic chemicals and technologies.

### **Care labelling**

Good work has been done regarding standardising and symbols for care labelling. The remaining issues concern whether the clothes become clean with the recommended treatment and whether they can withstand a rougher treatment (labelling based in precautions). There are large differences in laundry habits between different countries, including the use of dry cleaning [13]. It is important that the care labelling indicates what the item can withstand, even though in some countries there will be a tendency to use e.g., dry cleaning out of concern for consumer rights (the right to complain) and the environment. As for other labelling, it is therefore important to verify if the labelling is in fact correct. Many garments cannot be cleaned, or cleaning will have a significant effect on their quality. Other garments have recommendations that complicate the laundry process considerably while increasing the use of water, electricity and chemicals (e.g., small garments that need to be washed separately or with similar colours).

**Suggestion:** If care labelling is to be revised, knowledge about the potential weaknesses of the current practice and how different European regions' practices differ need to be collected.

### **Origin labelling**

The EU/EEA countries have differing legislation concerning whether origin labelling is mandatory and the requirements for something to be "Made in...". For such information to be relevant to the

consumer, it has to be composed in such a way that it details what is done where. It can e.g., be designed to contain the dominating materials/processes and the origin of the fibre, spinning, knitting/weaving and manufacture separately. The absence of good labelling systems for locally produced goods in the EU/EEA prevents the recognition of local producers on the market. Local production is an important, existing alternative to fast fashion and should be supported [14]. A more nuanced system for origin labelling could better this situation and make it easier for both European industry and consumers to choose locally produced goods.

**Suggestion:** Consider implementing voluntary labelling schemes for locally produced goods in the EU or revise one of the current systems for local food to include textiles. Consider whether labelling of origin should be more nuanced than what it is currently and whether it should be mandatory and harmonised across EU/EEA countries.

### **Size labelling**

Good fit and correct and good labelling of this is important to enable sustainable clothing consumption. Among clothing disposal reasons, the wrong fit is as important as wear and tear and issues with it are not only due to changes in the wearers' physique and taste but also inherently bad fit and little flexibility in fit, as well as the dissatisfactory labelling of sizes/fit [15]. This is a particularly prominent issue for women and children, while menswear has a less complex fit and better labelling.

**Suggestion:** Consider how the information about fit and the offer of clothing with a good fit, in sizes that correspond to the population of the EU can be improved.

### **Regulations need following up**

Better information to consumers is not just dependent on good regulations but also on the regulations being followed. The investigations done into the quality of labelling, meaning whether it corresponds to the actual product, are limited. We do, however, know that the fibre content is often incorrect. One example of labelling requirements that are bent beyond the initial intentions are the rules that say that man-made fibres shall be labelled with their production process, while natural fibres are marked with raw material. Still, viscose is labelled and marketed as "bamboo". These practices do not develop due to a lack of regulations, but due to a lack of follow-ups on existing regulations. If we are to have good labelling, misuse must have consequences.

**Suggestions:** We propose not only new labelling but also that measures against incorrect labelling and other misuse are strengthened.

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